

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

Regulation 19 SA Report

Volume 3 of 3: Appendices

March 2024



LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

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

Volume 3 of 3: Appendices

LC-1022	Document Control Box
Client	South Staffordshire District Council
Report Title	Sustainability Appraisal of the South Staffordshire Local Plan Review 2023-2041 – Volume 3 of 3: Appendices
Status	Final
Filename	LC-1022 Vol 3of3 Req19 SA Appendices 4 120324LB.docx
Date	March 2024
Author	GW
Reviewed	LB
Approved	ND

Appendices

Appendix A – Plan, Policy and Programmes Review

Appendix B – SA Framework

Appendix C – Consultation Responses (from Statutory Consultees)

Appendix D – Methodological Assumptions

Appendix E – Assessment of Additional Residential Growth Options

Appendix F – Assessment of Additional Spatial Options

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

Appendix H – Pre- and Post-Mitigation Assessments of All Reasonable Alternative Sites

Appendix I – Selection and Rejection of Reasonable Alternative Sites

Appendix J – Policy Assessments

Appendix A: Plan, Policy and Programme Review

A.1	Air	A1
A.2	Biodiversity, flora and fauna	A2
A.3	Climatic factors	A7
A.4	Cultural heritage.....	A10
A.5	Human health	A13
A.6	Landscape.....	A16
A.7	Population and material assets.....	A18
A.8	Soil	A24
A.9	Water	A25

A.1 Air

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to air	Implications for the LPR and SA
EC Air Quality Directive (1996)	Aims to improve air quality throughout Europe by controlling the level of certain pollutants and monitoring their concentrations. In particular, the Directive aims to establish levels for different air pollutants; draw up common methods for assessing air quality; methods to improve air quality; and make sure that information on air quality is easily accessible to Member States and the public.	The LPR and SA should consider the recommended actions in this document to improve air quality.
Clean Air Strategy (2019)	This Clean Air Strategy sets out how the Government will tackle all sources of air pollution, making air healthier to breathe, protecting nature and boosting the economy. The strategy includes targets such as a commitment to reduce PM2.5 concentrations across the UK, so that the number of people living in locations above the World Health Organisation (WHO) guideline level of 10 µg/m ³ is reduced by 50% by 2025.	The LPR and SA should consider the recommended actions in this document to improve air quality.
National Planning Policy Framework (2023)	The NPPF states that plans should prevent development from contributing to, or being put at risk of, air or water pollution. Plans should consider the presence of Air Quality Management Areas and cumulative impacts on air quality from individual sites in local areas.	The LPR and SA should adhere to the principles of the NPPF.
A Green Future: Our 25 Year Plan to Improve the Environment (2018)	<p>The document sets out Government action to help achieve natural world regain and retain good health. The main goals of the Plan are to achieve:</p> <ul style="list-style-type: none"> • Clean air; • Clean and plentiful water; • Thriving plants and wildlife; • A reduced risk of harm from environmental hazards such as flooding and drought; • Using resources from nature more sustainably and efficiently; and • Enhanced beauty, heritage and engagement with the natural environment. <p>The Plan seeks to achieve clean air by:</p> <ul style="list-style-type: none"> • Meeting legally binding targets to reduce emissions of five damaging air pollutants. This should halve the effects of air pollution on health by 2030; • Ending the sale of new conventional petrol and diesel cars and vans by 2040; and • Maintaining the continuous improvement in industrial emissions by building on existing good practice and the successful regulatory framework. <p>The Environment Act (2021) embeds several of these aspects into the new legislation.</p>	The LPR and SA should consider the vision of the 25 Year Plan to cleanse the air of pollutants and take on board the recommended actions in this document to improve air quality.
2008 Air Quality Action Plan South Staffordshire Council	This document summarises the status of all AQMAs in the district. It sets out a series of actions to address poor air quality in these areas and records the progress to date against each of these actions.	The LPR and SA should consider the impacts of, and on, air quality.

A.2 Biodiversity, flora and fauna

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to biodiversity, flora and fauna	Implications for the LPR and SA
The Pan-European Biological and Landscape Diversity Strategy (1995)	The strategy aims to stop and reverse the degradation of biological and landscape diversity values in Europe.	The LPR and SA should consider how biological and landscape diversity values can be protected and enhanced.
UN Convention on Biological Diversity (1992)	The aims of the Convention include the conservation of biological diversity (including a commitment to significantly reduce the current rate of biodiversity loss), the sustainable use of its components and the fair and equitable sharing of the benefits arising out of the utilization of genetic resources.	The LPR and SA should consider how biological diversity can be enhanced and protected.
Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora 1992 (the Habitats Directive)	<p>The main aim of the Habitats Directive is to promote the maintenance of biodiversity by requiring Member States to take measures to maintain or restore natural habitats and wild species listed on the Annexes to the Directive at a favourable conservation status, introducing robust protection for those habitats and species of European importance. In applying these measures Member States are required to take account of economic, social and cultural requirements, as well as regional and local characteristics.</p> <p>The provisions of the Directive require Member States to introduce a range of measures, including:</p> <ul style="list-style-type: none"> • Maintain or restore European protected habitats and species listed in the Annexes at a favourable conservation status as defined in Articles 1 and 2; • Contribute to a coherent European ecological network of protected sites by designating Special Areas of Conservation (SACs) for habitats listed on Annex I and for species listed on Annex II. These measures are also to be applied to Special Protection Areas (SPAs) classified under Article 4 of the Birds Directive. Together SACs and SPAs make up the Natura 2000 network (Article 3); • Ensure conservation measures are in place to appropriately manage SACs and ensure appropriate assessment of plans and projects likely to have a significant effect on the integrity of an SAC. Projects may still be permitted if there are no alternatives, and there are imperative reasons of overriding public interest. In such cases compensatory measures are necessary to ensure the overall coherence of the Natura 2000 network (Article 6); • Member States shall also endeavour to encourage the management of features of the landscape that support the Natura 2000 network (Articles 3 and 10); • Undertake surveillance of habitats and species (Article 11); • Ensure strict protection of species listed on Annex IV (Article 12 for animals and Article 13 for plants). • Report on the implementation of the Directive every six years (Article 17), including assessment of the conservation status of species and habitats listed on the Annexes to the Directive. 	The LPR and SA will need to have due regard to the SACs in the area.
The Conservation of Habitats and Species Regulations 2017 (as	This transposes into national law the Habitats Directive and also consolidates all amendments that have been made to the previous 1994 Regulations. This means that competent authorities have a general duty in the exercise of any of their functions to have regard to the Directive.	The LPR and SA will need to have due regard to the SACs in the area.

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to biodiversity, flora and fauna	Implications for the LPR and SA
amended) (Habitats Regulations)		
DEFRA: Biodiversity 2020: A strategy for England's wildlife and ecosystem services (2011)	<p>The England biodiversity strategy 2020 ties in with the EU biodiversity strategy in addition to drawing links to the concept of ecosystem services. The strategy's vision for England is: <i>"By 2050 our land and seas will be rich in wildlife, our biodiversity will be valued, conserved, restored, managed sustainably and be more resilient and able to adapt to change, providing essential services and delivering benefits for everyone"</i>.</p> <p>The Strategy's overall mission is: <i>"to halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people"</i>.</p>	The LPR and SA should consider how biodiversity can be enhanced and protected.
TCPA: Biodiversity by Design: A Guide for Sustainable Communities (2004)	The development process should consider ecological potential of all areas including both greenfield and brownfield sites. Local authorities and developers have a responsibility to mitigate impacts of development on designated sites and priority habitats and species and avoid damage to ecosystems.	The LPR and SA should consider how biodiversity can be enhanced and protected.
National Planning Policy Framework (2023)	<p>The NPPF includes guidance on promoting the conservation and enhancement of the natural environment. It requires the planning system to contribute to and enhance the natural and local environment by:</p> <ul style="list-style-type: none"> • protecting and enhancing valued landscapes, geological conservation interests and soils; • recognising the wider benefits of ecosystem services; • minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures; • preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability; and • remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate. 	The LPR and SA should adhere to the principles of the NPPF.
A Green Future: Our 25 Year Plan to Improve the Environment (2018)	<p>The document sets out government action to help achieve natural world regain and retain good health. The main goals of the Plan are to achieve:</p> <ul style="list-style-type: none"> • Clean air; • Clean and plentiful water; • Thriving plants and wildlife; • A reduced risk of harm from environmental hazards such as flooding and drought; • Using resources from nature more sustainably and efficiently; and • Enhanced beauty, heritage and engagement with the natural environment. 	The LPR and SA should consider how environmental challenges can be addressed and environmental goals can be met.
The Environment Improvement Plan (EIP) 2023	The Environmental Improvement Plan (EIP) 2023 for England is the first revision of the 25YEP. It builds on the 25YEP vision with a new plan setting out how the government will work with landowners, communities and businesses to deliver each of the goals for improving the environment, matched with interim targets to	The LPR and SA should consider how environmental challenges

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to biodiversity, flora and fauna	Implications for the LPR and SA
	<p>measure progress. The apex goal of the EIP is to improve nature, achieving thriving plants and wildlife, building on the Global Biodiversity Framework as agreed at the UN Nature Summit COP15 including a commitment to protect 30% of global land and 30% of global ocean by 2030. To achieve this, the EIP sets out to:</p> <ul style="list-style-type: none"> • Launch the Species Survival Fund to create, enhance and restore habitat; • Create, restore, and extend around 70 areas for wildlife through projects including new National Nature Reserves, and the next rounds of the Landscape Recovery Projects; • Protect 30% of our land and sea for nature through the Nature Recovery Network and enhanced protections for our marine protected areas. We intend to designate the first Highly Protected Marine Areas this year; and • Implement the Environment Act 2021, including rolling out Local Nature Recovery Strategies to identify areas to create and • restore habitat, and Biodiversity Net Gain to enhance the built environment. 	<p>can be addressed and environmental goals can be met.</p>
<p>Natural England Green Infrastructure Framework (2023)</p>	<p>The Green Infrastructure Framework is a commitment to the Government's 25 Year Environment Plan. The GI Framework supports the greening of towns and cities and looks to improve the surrounding landscapes as part of the Nature Recovery Network. The GI Framework will ensure that planning authorities and developers meet the requirements in the NPPF to consider GI in local plans and in new development. The GI Framework is underpinned by 15 principles based on the benefits of GI 'why' Principles, the descriptive or 'what' principles and the process or 'how' principles.</p>	<p>The LPR and SA should consider the multifunctional benefits of GI and how these can be incorporated into the plan area.</p>
<p>Making Space for Nature: a review of England's wildlife sites and ecological network (2010)</p>	<p>The Making Space for Nature report, which investigated the resilience of England's ecological network to multiple pressures, concluded that England's wildlife sites do not comprise of a coherent and resilient ecological network. The report advocates the need for a step change in conservation of England's wildlife sites to ensure they are able to adapt and become part of a strong and resilient network. The report summarises what needs to be done to improve England's wildlife sites to enhance the resilience and coherence of England's ecological network in four words; more, bigger, better, and joined. There are five key approaches which encompass these, which also take into account of the land around the ecological network:</p> <ul style="list-style-type: none"> • Improve the quality of current sites by better habitat management. • Increase the size of current wildlife sites. • Enhance connections between, or join up, sites, either through physical corridors, or through 'stepping stones'. • Create new sites. • Reduce the pressures on wildlife by improving the wider environment, including through buffering wildlife sites. 	<p>The LPR and SA should consider how England's wildlife sites and ecological network can be enhanced and protected.</p>
<p>The England Trees Action Plan 2021-2024</p>	<p>The Trees Action Plan sets out how the Government will tackle the challenges of biodiversity loss and climate change, in line with the goals of the 25 Year Environment Plan. The plan provides a strategic framework for implementing the Nature for Climate Fund and outlines over 80 policy actions the</p>	<p>The LPR and SA should consider how trees, woods and forests can be enhanced and protected.</p>

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to biodiversity, flora and fauna	Implications for the LPR and SA
<p>The Natural Choice: Securing the Value of Nature. The Natural Environment White Paper. (HM Government 2011)</p>	<p>government is taking over this Parliament to help deliver this vision. Planting vastly more trees in England, and protecting and improving our existing woodlands, will be key to the Government’s plan to achieve net zero and to create a Nature Recovery Network across the length of England.</p> <p>Published in June 2011, the Natural Environment White paper sets out the Government’s plans to ensure the natural environment is protected and fully integrated into society and economic growth. The White Paper sets out four key aims:</p> <p>(i) <u>Protecting and improving our natural environment</u></p> <p>There is a need to improve the quality of our natural environment across England, moving to a net gain in the value of nature. It aims to arrest the decline in habitats and species and the degradation of landscapes. It will protect priority habitats and safeguard vulnerable non-renewable resources for future generations. It will support natural systems to function more effectively in town, in the country and at sea. It will achieve this through joined-up action at local and national levels to create an ecological network which is resilient to changing pressures.</p> <p>(ii) <u>Growing a green economy</u></p> <p>The ambition is for a green and growing economy which not only uses natural capital in a responsible and fair way but also contributes to improving it. It will properly value the stocks and flows of natural capital. Growth will be green because it is intrinsically linked to the health of the country’s natural resources. The economy will capture the value of nature. It will encourage businesses to use natural capital sustainably, protecting and improving it through their day-to-day operations and the management of their supply chains.</p> <p>(iii) <u>Reconnecting people and nature</u></p> <p>The ambition is to strengthen the connections between people and nature. It wants more people to enjoy the benefits of nature by giving them freedom to connect with it. Everyone should have fair access to a good-quality natural environment. It wants to see every child in England given the opportunity to experience and learn about the natural environment. It wants to help people take more responsibility for their environment, putting local communities in control and making it easier for people to take positive action.</p> <p>(iv) <u>International and EU leadership</u></p> <p>The global ambitions are:</p> <ul style="list-style-type: none"> internationally, to achieve environmentally and socially sustainable economic growth, together with food, water, climate and energy security; and to put the EU on a path towards environmentally sustainable, low-carbon and resource-efficient growth, which is resilient to climate change, provides jobs and supports the wellbeing of citizens 	<p>The SA Framework should include objectives relating to the protection and enhancement of the natural environment.</p>
<p>CABE Making Contracts Work for Wildlife: How to Encourage Biodiversity in Urban Parks (2006)</p>	<p>Advises on how to make the most of the potential for biodiversity in urban parks and it shows how the commitment of individuals and employers can make the difference between failure and inspiring success.</p>	<p>The LPR and SA should consider how biodiversity can be enhanced and protected.</p>

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to biodiversity, flora and fauna	Implications for the LPR and SA
Site Improvement Plan, Cannock Chase Special Area of Conservation, Natural England (2015)	The Site Improvement Plan for Cannock Chase SAC sets out the qualifying features of Cannock Chase for which it was designated as a SAC. It informs of the threats and pressures to which the SAC is vulnerable and lays out plans for management of the SAC to avoid and mitigate adverse impacts of development.	The LPR and SA should aim to protect the integrity of Cannock Chase SAC and its qualifying features.
Staffordshire Biodiversity Action Plan	The Staffordshire Biodiversity Action Plan (SBAP) has been in place since 1998 in order to co-ordinate conservation efforts in delivering the UK BAP targets at a more local level. SBAP sets out strategies for conservation projects and providing ecological objectives and targets within a strategic framework.	The LPR should aim to ensure new development contributes towards the strategic aims of the SBAP.
Emerging Local Nature Recovery Strategy for Staffordshire	Led by Staffordshire County Council, the Local Nature Recovery Strategy (LNRS) for Staffordshire and Stoke-on-Trent will set out priorities identified by the partnership to drive a coordinated action plan. This will support the recovery of natural habitats and species, in line with the 2021 Environment Act.	The LPR should consider opportunities to embed nature recovery, considering how the Plan can align with the priorities of the emerging LNRS.

A.3 Climatic factors

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to climatic factors	Implications for the LPR and SA
UN Framework Convention on Climate Change (1992)	Sets an overall framework for intergovernmental efforts to tackle the challenge posed by climate change.	The LPR and SA should consider ways to reduce the impact of climate change in South Staffordshire.
IPCC Kyoto Protocol to the United Nations Framework Convention on Climate Change (1997)	Commits member nations to reduce their emissions of carbon dioxide and other greenhouse gases or engage in emissions trading if they maintain or increase emissions of these gases.	The LPR and SA should consider ways to reduce the impact of climate change in South Staffordshire.
EC Sixth Environmental Action Programme Community 2002-2012	Climate change has been identified as one of four priority areas for Europe. The EAP's main objective is a reduction in emissions of greenhouse gases without a reduction in levels of growth and prosperity, as well as adaptation and preparation for the effects of climate change.	The LPR and SA should consider ways to reduce the impact of climate change in South Staffordshire.
EU Sustainable Development Strategy (2006)	This Strategy identifies key priorities for an enlarged Europe. This includes health, social inclusion and fighting global poverty. It aims to achieve better policy integration in addressing these challenges, and to ensure that Europe looks beyond its boundaries in making informed decisions about sustainability. The Sustainable Development Strategy was review in 2009 and "underlined that in recent years the EU has mainstreamed sustainable development into a broad range of its policies. In particular, the EU has taken the lead in the fight against climate change and the promotion of a low-carbon economy. At the same time, unsustainable trends persist in many areas and the efforts need to be intensified". Sustainable development is a key focus of the EU and the strategy continues to be monitored and reviewed.	The LPR and SA should consider ways to promote sustainable development in South Staffordshire.
UK Renewable Energy Roadmap Update (2013)	This is the second Update to the 2011 Renewable Energy Roadmap. It sets out the progress that has been made and the changes that have occurred in the sector over the past year. It also describes the continuing high ambitions and actions along with the challenges going forward.	The LPR and SA should consider ways to promote renewable energy generation in the district.
The UK Low Carbon Transition Plan (2009)	The UK Low Carbon Transition Plan sets out how the UK will meet the Climate Change Act's legally binding target of 34 per cent cut in emissions on 1990 levels by 2020. It also seeks to deliver emissions cuts of 18% on 2008 levels. The main aims of the Transition Plan include the following: <ul style="list-style-type: none"> Producing 30% of energy from renewables by 2020; Improving the energy efficiency of existing housing; Increasing the number of people in 'green jobs'; and Supporting the use and development of clean technologies. 	The LPR and SA should consider ways to reduce greenhouse gas emissions in the district.

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to climatic factors	Implications for the LPR and SA
National Planning Policy Framework (2023)	<p>The NPPF includes guidance on climate change, flooding, and coastal change. Plans should take account of climate change over the longer term, including factors such as flood risk, coastal change, water supply and changes to biodiversity and landscape. New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure. To support the move to a low carbon future, planning authorities should:</p> <ul style="list-style-type: none"> • plan for new development in locations and ways which reduce greenhouse gas emissions; • actively support energy efficiency improvements to existing buildings; and • when setting any local requirement for a building’s sustainability, do so in a way consistent with the Government’s zero carbon buildings policy and adopt nationally described standards. <p>Local plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change, by:</p> <ul style="list-style-type: none"> • applying the Sequential Test; • if necessary, applying the Exception Test; • safeguarding land from development that is required for current and future flood management; • using opportunities offered by new development to reduce the causes and impacts of flooding. 	The LPR and SA should adhere to the principles of the NPPF.
DfT An Evidence Base Review of Public Attitudes to Climate Change and Transport Behaviour (2006)	Summary report of the findings of an evidence base review investigating the research base on public attitudes towards climate change and transport behaviour.	The LPR and SA should consider how to increase public awareness towards climate change in the district.
Carbon Trust: The Climate Change Challenge: Scientific Evidence and Implications (2005)	This report summarises the nature of the climate change issue. It explains the fundamental science and the accumulating evidence that climate change is real and needs to be addressed. It also explains the future potential impacts, including the outstanding uncertainties.	The LPR and SA should consider ways to reduce the impact of climate change in the district.
Energy Saving Trust: Renewable Energy Sources for Homes in Urban Environments (2005)	Provides information about the integration of renewable energy sources into new and existing dwellings in urban environments. It covers the basic principles, benefits, limitations, costs and suitability of various technologies.	The LPR and SA should consider ways to integrate renewable energy technology into new and existing dwellings.

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

A.4 Cultural heritage

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to cultural heritage	Implications for the LPR and SA
Council of Europe: Convention on the Protection of the Architectural Heritage of Europe (1985)	Aims for signatories to protect their architectural heritage by means of identifying monuments, buildings and sites to be protected; preventing the disfigurement, dilapidation or demolition of protected properties; providing financial support by the public authorities for maintaining and restoring the architectural heritage on its territory; and supporting scientific research for identifying and analysing the harmful effects of pollution and for defining ways and means to reduce or eradicate these effects.	The LPR and SA should consider the recommended actions in this document to protect architectural heritage in the district.
Council of Europe: The Convention on the Protection of Archaeological Heritage (Revised) (Valetta Convention) (1992)	The convention defines archaeological heritage and identifies measures for its protection. Aims include integrated conservation of the archaeological heritage and financing of archaeological research and conservation.	The LPR and SA should consider the recommended actions in this document to protect archaeological heritage in the districts
National Planning Policy Framework (2023)	<p>The NPPF includes guidance on conserving and enhancing the historic environment. It seeks to ensure local authorities plan recognise heritage assets as an irreplaceable resource and conserve them in a manner that reflects their significance. Planning authorities should take into account:</p> <ul style="list-style-type: none"> • The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; • The wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring; and • The desirability of new development making a positive contribution to local character and distinctiveness; and opportunities to draw on the contribution made by the historic environment to the character of a place. 	The LPR and SA should adhere to the principles of the NPPF.
English Heritage and CBE: Buildings in Context: New Development in Historic Areas (2002)	Aims to stimulate a high standard of design when development takes place in historically sensitive contexts by showing 15 case studies in which achievement is far above the ordinary and trying to draw some lessons both about design and about the development and planning process, particularly regarding building in sensitive locations.	The LPR and SA should consider the recommended actions in this document regarding building new homes in historically sensitive locations.
Historic England: Conservation Principles Policies and Guidance for the Sustainable Management of the Historic Environment (2008)	<p>This Historic England document sets out the framework for the sustainable management of the historic environment. This is presented under the following six headline 'principles':</p> <p>Principle 1: The historic environment is a shared resource</p> <p>Principle 2: Everyone should be able to participate in sustaining the historic environment</p> <p>Principle 3: Understanding the significance of places is vital</p> <p>Principle 4: Significant places should be managed to sustain their values</p>	The LPR and SA should consider the recommended actions in this document to protect the historic environment in the district.

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to cultural heritage	Implications for the LPR and SA
	Principle 5: Decisions about change must be reasonable, transparent and consistent Principle 6: Documenting and learning from decisions is essential.	
Historic England: Tall Buildings: Historic England Advice Note 4 (2015)	This Historic England Advice Note updates previous guidance by Historic England and CABE, produced in 2007. It seeks to guide people involved in planning for and designing tall buildings so that they may be delivered in a sustainable and successful way through the development plan and development management process. The advice is for all relevant developers, designers, local authorities and other interested parties.	The LPR and SA should consider the recommended actions in this document to protect heritage assets in the district.
Historic England (2015) The Historic Environment in Local Plans, Historic Environment Good Practice Advice in Planning: 1	Practice Advice note is to provide information to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the National Planning Practice Guide (PPG).	Development proposed in the LPR should be in accordance with Historic England's advice.
Historic England (2015) Managing Significance in Decision-Taking in the Historic Environment, Historic Environment Good Practice Advice in Planning: 2	The purpose of this Historic England Good Practice Advice note is to provide information in relation to assessing the significance of heritage assets, using appropriate expertise, historic environment records, recording and furthering understanding, neglect and unauthorised works, marketing and design and distinctiveness.	Development proposed in the LPR should be in accordance with Historic England's advice.
Historic England (2015) The Setting of Heritage Assets, Historic Environment Good Practice Advice in Planning: 3	This document sets out guidance, against the background of the National Planning Policy Framework (NPPF) and the related guidance given in the Planning Practice Guide (PPG), on managing change within the settings of heritage assets, including archaeological remains and historic buildings, sites, areas, and landscapes.	Development proposed in the LPR should be in accordance with Historic England's advice.
The Historic Environment and Site Allocations in Local Plans Historic England Advice Note 3 (2015)	The purpose of this Historic England advice note is to support all those involved in the Local Plan site allocation process in implementing historic environment legislation, the relevant policy in the National Planning Policy Framework (NPPF) and the related guidance given in the Planning Practice Guide (PPG). In addition to these documents, this advice should be read in conjunction with the relevant Good Practice Advice and Historic England advice notes. Alternative approaches may be equally acceptable, provided they are demonstrably compliant with legislation and national policy objectives.	Development proposed in the LPR should be in accordance with Historic England's advice.
Staffordshire County Council Guidance Note (2015): Historic Structures and Areas,	This advice is aimed at all general works of design, maintenance and repair to historic structures within the public realm, as well as advice on highway schemes. It provides guidance in relation to various works, including re-pointing, cleaning brickwork, band traffic management.	The LPR should ensure any development which seeks to impact the design, maintenance

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to cultural heritage	Implications for the LPR and SA
Practical Conservation and Design		and/or repair of historic buildings follows this guidance.
Historic Environment Character Assessment: South Staffordshire, January 2011	This assessment identifies heritage assets in the district, including national and local designations. It offers an overview of their current condition and makes recommendations for their conservation and enhancement. Assets include historic landscapes, historic buildings and conservations areas.	The LPR and SA should take opportunities to protect and enhance heritage assets and have regard to the assessment’s recommendations.

A.5 Human health

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to human health	Implications for the LPR and SA
DCMS: Playing to win: a new era for sport. (2008)	The Government's vision for sport and physical activity for 2012 and beyond is to increase significantly levels of sport and physical activity for people of all ages and to achieve sustained levels of success in international competition. The ambition is for England to become a truly world leading sporting nation. The vision is to give more people of all ages the opportunity to participate in high quality competitive sport.	The LPR and SA should consider how to support access to sports facilities and increase participation in sport for the South Staffordshire residents.
DoH: Healthy Lives, Healthy People: Our strategy for public health in England White Paper (2011)	Sets out the Government's approach to tackling threats to public health and dealing with health inequalities. It sets out an approach that will: <ul style="list-style-type: none"> • Protect the population from health threats – led by central government, with a strong system to the frontline; • Empower local leadership and encourage wide responsibility across society to improve everyone's health and wellbeing, and tackle the wider factors that influence it; • Focus on key outcomes, doing what works to deliver them, with transparency of outcomes to enable accountability through a proposed new public health outcomes framework; • Reflect the government's core values of freedom, fairness and responsibility by strengthening self-esteem, confidence and personal responsibility; positively promoting healthy behaviours and lifestyles; and adapting the environment to make healthy choices easier; and • Balance the freedoms of individuals and organisations with the need to avoid harm to others, use a 'ladder' of interventions to determine the least intrusive approach necessary to achieve the desired effect and aim to make voluntary approaches work before resorting to regulation. 	The LPR and SA should consider how to support healthy lives of residents.
Natural England Green Infrastructure Framework (2023)	The Green Infrastructure Framework is a commitment to the Governments 25 Year Environment Plan. The GI Framework supports the greening of towns and cities and looks to improve the surrounding landscapes as part of the Nature Recovery Network. The GI Framework will ensure that planning authorities and developers meet the requirements in the NPPF to consider GI in local plans and in new development. The GI Framework is underpinned by 15 principles based on the benefits of GI 'why' Principles, the descriptive or 'what' principles and the process or 'how' principles. GI would provide local residents with active and healthy places to live and can facilitate social cohesion in communities and add value to local identity.	The LPR and SA should consider the multifunctional benefits of GI and how these can be incorporated into the plan area.
Public Health Strategy 2020-2025 (2019)	The strategy sets out priorities within the public health system and areas of focus including addressing health inequalities and narrowing the 'health gap' between poor and wealthy communities, reducing rates of infectious diseases, addressing unhealthy behaviours and ensuring the potential of new technologies is realised.	The LPR and SA should consider how to address health inequalities across the Plan area and promote healthy living.

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

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to human health	Implications for the LPR and SA
Staffordshire County Council Local Cycling and Walking Infrastructure Plan 2020 – 2030	This is Staffordshire County Council's first Local Cycling and Walking Infrastructure Plan (LCWIP) and the vision is to: " <i>Increase people's connectivity through cycling and walking to employment, education and leisure, leading to positive changes in modal shift, enabling people to lead safer, healthier and more independent lives</i> ". The LCWIP will build on the Council's successful delivery of previous sustainable transport projects. It takes a comprehensive network approach and targets the areas where there is the greatest demand and the largest potential for the transfer of short journeys to walking or cycling.	The LPR and SA should consider how to improve and encourage access to and use of cycling and walking infrastructure, to encourage the uptake of active travel and healthy lifestyles.
South Staffordshire Council Open Space Strategy 2014 – 2028	The Open Space Strategy sets out the existing open space provision in the district, including the availability of natural and semi-natural space. It also sets out the way forward for enhancing the safety, vibrancy and quality of open space and, in so doing, improving its suitability for children and young people whilst supporting good health and wellbeing of residents.	The LPR and SA should maintain existing open space provision and promote the provision of new and high-quality open space.
South Staffordshire District, Ageing Well Framework 2011	The ageing population of South Staffordshire is growing fast. This framework recognises that issue and lays out the facts, priorities and a plan for action for helping to ensure that older people in the district are health, independent, live in appropriate housing, are out and about and valued and involved, live in a safe environment and are financially secure.	The LPR and SA should consider the needs of the ageing population and ensure neighbourhoods are welcoming and accessible for residents of all ages.

A.6 Landscape

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to landscape	Implications for the LPR and SA
Council of Europe: European Landscape Convention (2006)	Aims to promote the protection, management and planning (including active design and creation of Europe's landscapes, both rural and urban, and to foster European co-operation on landscape issues.	The LPR and SA should consider the recommended actions in this document to correctly manage the rural and urban landscape.
English Heritage and CABI: Guidance on Tall Buildings (2007)	Provides advice and guidance on good practice in relation to tall buildings in the planning process and to highlight other related issues, which need to be taken into account, i.e., where tall buildings would and would not be appropriate.	The LPR and SA should consider the recommended actions in this document to correctly manage the planning of tall buildings in the district.
National Planning Policy Framework (2023)	The NPPF states that development could seek to promote or reinforce local distinctiveness; both aesthetic considerations and connections between people and places should be considered. The NPPF also promotes the protection and enhancements of valued landscapes, giving greatest weight to National Parks and AONBs.	The LPR and SA should adhere to the principles of the NPPF.
Environmental Improvement Plan 2023	<p>The Environmental Improvement Plan (EIP) 2023 builds on the 25YEP vision with a new plan setting out how the government will work with landowners, communities and businesses to deliver each of the goals for improving the environment, matched with interim targets to measure progress. To enhance beauty, heritage, and engagement with the natural environment, the EIP sets out to:</p> <ul style="list-style-type: none"> • Work across government to fulfil a new and ambitious commitment that everyone should live within 15 minutes walk of a green or blue space; • Continue our delivery of the England Coast Path and the Coast to Coast National Trail; • Green the Green Belt as set out in the Levelling Up White Paper by identifying key areas for nature restoration; • Invest in a new national landscapes partnership for National Parks, AONBs and National Trails; • Extend the delivery of our Farming in Protected Landscapes programme, using lessons learned to inform future farming schemes; and • Invest in active travel, with a vision for half of all journeys in towns and cities to be cycled or walked by 2030. 	The LPR and SA should consider how environmental challenges can be addressed and environmental goals can be met.
Natural England Green Infrastructure Framework (2023)	The Green Infrastructure (GI) Framework is a commitment to the Governments 25 Year Environment Plan. The GI Framework supports the greening of towns and cities and looks to improve the surrounding landscapes as part of the Nature Recovery Network. The GI Framework will ensure that planning authorities and developers meet the requirements in the NPPF to consider GI in local plans and in new development. The GI Framework is underpinned by 15 principles based on the benefits of GI 'why'	The LPR and SA should consider the multifunctional benefits of GI and how these can be incorporated into the plan area.

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to landscape	Implications for the LPR and SA
	Principles, the descriptive or 'what' principles and the process or 'how' principles.	
MHCLG: National Design Guide: Planning practice guidance for beautiful, enduring and successful places (2021)	This design guide illustrates how well-designed places that are beautiful, enduring and successful can be achieved in practice. It forms part of the Government's collection of planning practice guidance and should be read alongside the separate planning practice guidance on design process and tools.	The LPR and SA should seek to incorporate the principles of the National Design Guide within planning proposals.
Cannock Chase AONB Management Plan 2019 - 2024	The management plan sets out the key issues for the AONB, which include landscape, people, economy, recreation and support, in line with the SEA Directive and Habitat Regulations. For each of these issues, the management plan sets out policies and plan delivery actions as well as monitoring programme. The plan demonstrates how the AONB partnership will continue to protect the Cannock Chase environment from growing pressures such as climate change and population growth. It seeks to protect the AONB's tranquility, biodiversity value, perception amongst the public and to help establish somewhere prosperous, clean, sustainable and enjoyable.	The LPR should seek to be in accordance with the management plan and to avoid adverse impacts on the AONB. The SA should help to ensure the LPR does so.
South Staffordshire Landscape Sensitivity Assessment (2019)	The Landscape Sensitivity Assessment provides an assessment of the extent to which the character and quality of the landscape abutting the West Midlands conurbation within the Black Country and South Staffordshire, is, in principle, susceptible to change as a result of introducing built development. The study concentrates on understanding the sensitivities to development and does not address potential landscape capacity.	The LPR should seek to conserve and enhance the landscape and visual sensitivities identified in the study wherever possible.
South Staffordshire Landscape Character Assessment (2000)	The Landscape Character Assessment provides descriptions of the landscape within the Plan area. The assessment provides details of landscape character types that are found within that area.	The LPR and SA should promote the conservation and enhancement of the landscape character drawing on the findings and recommendations of the LCA.
South Staffordshire Green Belt Study (2019)	<p>The Green Belt Study includes a comprehensive assessment of the performance of Green Belt land in line with policy set out in the NPPF good practice guidance, local plan examination inspectors' reports and case law. The assessment addresses the five purposes of the Green Belt and if these are upheld in South Staffordshire:</p> <ol style="list-style-type: none"> 1. To check the unrestricted sprawl of large built-up areas 2. Prevent neighboring towns from merging 3. Assist in safeguarding the countryside from encroachment 4. Pressure the setting and special character of historic towns 5. To assist in urban regeneration by encouraging the recycling of derelict and other urban land 	The LPR and SA should ensure adherence to government guidance in terms of planning and development within the Green Belt.

A.7 Population and material assets

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to population and material assets	Implications for the LPR and SA
National Planning Policy Framework (2023)	<p>The NPPF includes guidance on promoting healthy communities, and requires planning authorities to aim to achieve places which promote:</p> <ul style="list-style-type: none"> • Opportunities for meetings between members of the community who might not otherwise come into contact with each other, including through mixed-use developments, strong neighbourhood centres and active street frontages which bring together those who work, live and play in the vicinity; • Safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and • Safe and accessible developments, containing clear and legible pedestrian routes, and high-quality public space, which encourage the active and continual use of public areas. <p>In order to deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:</p> <ul style="list-style-type: none"> • Plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments; • Guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs; • Ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and retained for the benefit of the community; and • Ensure an integrated approach to considering the location of housing, economic uses and community facilities and services. 	The LPR and SA should adhere to the principles of the NPPF.
Homes for the future: more affordable, more sustainable (2007)	The Housing Green Paper outlines plans for delivering homes; new ways of identifying and using land for development; more social housing- ensuring that a decent home at an affordable price is for the many; building homes more quickly; more affordable homes; and greener homes - with high environmental standards and flagship developments leading the way.	The LPR and SA should consider how to deliver more affordable and environmentally sustainable homes.
ODPM & Home Office: Safer Places: The Planning System and Crime Prevention (2004)	Practical guide to designs and layouts that may help with crime prevention and community safety, including well-defined routes, places structured so that different uses do not cause conflict, places designed to include natural surveillance and places designed with management and maintenance in mind.	The LPR and SA should consider how to prevent crime in new developments.
Cabinet Office: Reaching Out: An Action Plan on Social Exclusion (2006)	Sets out an action plan to improve the life chances of those who suffer, or may suffer in the future, from disadvantage. Guiding principles for action include: better identification and earlier intervention; systematically identifying 'what works'; promoting multi-agency working; personalisation, rights and responsibilities; and supporting achievement and managing underperformance.	The LPR and SA should consider how to reduce suffering and improve the life chances of disadvantaged people.

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to population and material assets	Implications for the LPR and SA
Homes England Strategic Plan 2023 to 2028	<p>This 5-year plan spans financial year 2023 to 2024 to financial year 2027 to 2028. It outlines:</p> <ul style="list-style-type: none"> • Homes England’s mission • Strategic objectives and aims • How performance will be measured <p>The plan seeks to drive regeneration and housing delivery to create high-quality homes and thriving places. This will support greater social justice, the levelling up of communities across England and the creation of places people are proud to call home, in line with the priorities of the government’s Levelling Up White Paper.</p>	The LPR and SA should promote development which would increase the quality and beauty of homes and places.
EC Waste Framework Directive (1975, updated 2006)	Objective is the protection of human health and the environment against harmful effects caused by the collection, transport, treatment, storage and tipping of waste. Particular focus is placed on the re-use of recovered materials as raw materials; restricting the production of waste; promoting clean technologies; and the drawing up of waste management plans.	The LPR and SA should consider the recommended actions in this document to correctly manage waste disposal.
EC Landfill Directive (1999)	Aims to prevent or reduce as far as possible negative effects on the environment, in particular the pollution of surface water, groundwater, soil and air, and on the global environment, including the greenhouse effect, as well as any resulting risk to human health, from the landfilling of waste, during the whole lifecycle of the landfill.	The LPR and SA should consider the recommended actions in this document to correctly manage waste disposal.
DEFRA Waste Strategy for England (2007)	Aims are to reduce waste by making products with fewer natural resources; break the link between economic growth and waste growth; re-use products or recycle their materials; and recover energy from other wastes where possible. Notes that for a small amount of residual material, landfill will be necessary.	The LPR and SA should consider the recommended actions in this document to correctly manage waste disposal.
DECC Energy White Paper: Meeting the Energy Challenge (2007)	<p>Sets out Government’s long term energy policy, including requirements for cleaner, smarter energy; improved energy efficiency; reduced carbon emissions; and reliable, competitive and affordable supplies. The White Paper sets out the UK’s international and domestic energy strategy, in the shape of four policy goals:</p> <ol style="list-style-type: none"> 1) aiming to cut CO₂ emissions by some 60% by about 2050, with real progress by 2020; 2) maintaining the reliability of energy supplies; 3) promoting competitive markets in the UK and beyond; and 4) ensuring every home is heated adequately and affordably. 	The LPR and SA should consider ways to reduce the impact of climate change in the district.
DTI Micro Generation Strategy (2006)	Acknowledges that local authorities can be pro-active in promoting small-scale, local renewable energy generation schemes through “ <i>sensible use of planning policies</i> ”.	The LPR and SA should consider promoting small scale renewable energy generation schemes.
EU Sustainable Development Strategy (2006)	This Strategy identifies key priorities for an enlarged Europe. This includes health, social inclusion and fighting global poverty. It aims to achieve better policy integration in addressing these challenges, and to ensure that Europe looks beyond its boundaries in making informed decisions about sustainability. The sustainable Development Strategy was reviewed in 2009 and “underlined that in recent years the EU has	The LPR and SA should consider ways to promote sustainable development in the district.

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to population and material assets	Implications for the LPR and SA
	<p>mainstreamed sustainable development into a broad range of its policies. In particular, the EU has taken the lead in the fight against climate change and the promotion of a low-carbon economy. At the same time, unsustainable trends persist in many areas and the efforts need to be intensified". Sustainable development is a key focus of the EU and the strategy continues to be monitored and reviewed.</p>	
National Planning Policy Framework (2023)	<p>The NPPF includes guidance on promoting sustainable transport. The NPPF requires development plans to seek to reduce greenhouse gas emissions and congestion, reduce the need to travel, and exploit opportunities for the sustainable movement of people and goods. Developments should be located and designed where practical to:</p> <ul style="list-style-type: none"> • Accommodate the efficient delivery of goods and supplies; • Give priority to pedestrian and cycle movements, and have access to high quality public transport facilities; • Create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones; and • Incorporate facilities for charging plug-in and other ultra-low emission vehicles; and consider the needs of people with disabilities by all modes of transport. 	The LPR and SA should adhere to the principles of the NPPF.
Department for Transport: Transport White Paper: The Future of Transport – A Network for 2030 (2004)	Sets out factors that will shape transport in the UK over the next thirty years. Also sets out how the Government will respond to the increasing demand for travel, while minimising the negative impact on people and the environment.	The LPR and SA should consider ways to reduce the impact of transport on the environment.
Department for Transport: Towards a Sustainable Transport System: Supporting Economic Growth in a Low Carbon World (2008)	<p>Outlines five national goals for transport, focusing on the challenge of delivering strong economic growth while at the same time reducing greenhouse gas emissions. It outlines the key components of national infrastructure, discusses the difficulties of planning over the long term in the context of uncertain future demand and describes the substantial investments we are making to tackle congestion and crowding on transport networks. The National Goals for Transport are as follows:</p> <p>Goal 1: To reduce transport's emissions of carbon dioxide and other greenhouse gases, with the desired outcome of tackling climate change.</p> <p>Goal 2: To support economic competitiveness and growth, by delivering reliable and efficient transport networks.</p> <p>Goal 3: To promote greater equality of opportunity for all citizens, with the desired outcome of achieving a fairer society.</p> <p>Goal 4: To contribute to better safety, security and health and longer life expectancy by reducing the risk of death, injury or illness arising from transport, and by promoting travel modes that are beneficial to health.</p> <p>Goal 5: To improve quality of life for transport users and non-transport users, and to promote a healthy natural environment.</p>	The LPR and SA should consider ways to reduce the impact of transport on the environment.

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to population and material assets	Implications for the LPR and SA
Department for Transport: Connecting People: a Strategic Vision for Rail (2017)	<p>The document describes the government’s strategic vision for the railways, and the actions that will be taken to make it a reality. The key priorities include:</p> <ol style="list-style-type: none"> 1. A more reliable railway 2. An expanded network 3. A better deal for passengers 4. A modern workforce 5. A productive and innovative sector 	The LPR and SA should consider ways to support the future of Britain’s railway system.
Department for Transport: An Evidence Base Review of Public Attitudes to Climate Change and Transport Behaviour (2006)	Summary report of the findings of an evidence base review investigating the research base on public attitudes towards climate change and transport behaviour.	The LPR and SA should consider ways to encourage support for reducing greenhouse gas emissions.
Cycling and walking plan for England (2020)	<p>The ‘Gear change: a bold vision for cycling and walking’ document sets out a vision for a travel revolution in England’s streets, towns and communities. The plan sets out the multiple benefits of increased cycling and walking including health, congestion, the economy and air quality, and the vision that “<i>cycling and walking will be the natural first choice for many journeys with half of all journeys in towns and cities being cycled or walked by 2030</i>”. The plan sets out four main themes to achieve this vision:</p> <ul style="list-style-type: none"> • Theme 1: Better streets for cycling and people; • Theme 2: Cycling at the heart of decision-making; • Theme 3: Empowering and encouraging Local Authorities; and • Theme 4: Enabling people to cycle and protecting them when they do. 	The LPR and SA should consider ways to support cycling as a sustainable mode of transport in the district.
DEFRA, Noise Policy Statement for England (NPSE) (2010)	<p>This document seeks to clarify the underlying principles and aims in existing policy documents, legislation and guidance that relate to noise. The key aims of this document are as follows:</p> <ul style="list-style-type: none"> • Avoid significant adverse impacts on health and quality of life; • Mitigate and minimise adverse impacts on health and quality of life; and • Where possible, contribute to the improvement of health and quality of life. 	The LPR and SA should consider the recommended actions in this document to reduce the impact of noise on health and quality of life.
Strategy for Sustainable Construction (2008)	“Themes for Action” include: re-use existing built assets; design for minimum waste; aim for lean construction; minimise energy in construction; minimise energy in building use; avoid polluting the environment; preserve and enhance biodiversity; conserve water resources; respect people and their local environment; and set targets (benchmarks & performance indicators).	The LPR and SA should consider ways to support sustainable construction in the district.
Planning for Town Centres: Practice guidance on need,	This practice guidance was intended to support the implementation of town centre policies set out in Planning Policy Statement 4: Planning for Sustainable Economic Growth (PPS4) (now replaced by PPG). It is aimed at helping those involved in preparing or reviewing need, impact and sequential site assessments.	The LPR and SA should consider the recommended actions in this document to plan for sustainable

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to population and material assets	Implications for the LPR and SA
impact and the sequential approach (2009)		economic growth.
Staffordshire County Council Rights of Way Improvement Plan for Staffordshire	This plan lays out the demand for access and needs of users in terms of the Public Rights of Way network in the county of Staffordshire. It assesses the existing provision and condition of the network and identifies areas for improvement. Measures to take action and achieve this improvement are identified with practical steps to be taken. Plans to monitor the effectiveness of improvement efforts are also made clear. A new version of the improvement plan is currently being consulted on.	The LPR and SA should consider how to improve and encourage access to the PRoW network.
Staffordshire Local Transport Plan 2011, Staffordshire County Council	The transport plan for the county has a range of objectives, including to support economic growth which avoids congestion, to improve employment and education opportunities for residents, to improve road safety to respond to current and future climate change and to encourage and provide for active travel.	The LPR and SA should adhere to the principles of the Transport Plan. Management of waste is achieved.
South Staffordshire District Integrated Transport Strategy (2023)	<p>Integrated Transport Strategies have been developed for the eight District / Boroughs in Staffordshire to help prioritise the County Council's expenditure on transport improvements in the short term and during the period of the planning authority's Local Plan. The objectives of the South Staffordshire Integrated Transport Strategy are as follows:</p> <ul style="list-style-type: none"> • Summarise the key highway and transport issues • Integrate transport and planning policy • Identify transport solutions that will help to: <ul style="list-style-type: none"> ○ Achieve Staffordshire County Council vision and outcomes ○ Deliver the Local Plan ○ Support Local Enterprise Partnership objectives ○ Reflect communities concerns • Outline funding options and delivery mechanisms 	The LPR should ensure the findings of the strategy are taken into account within the Plan and its policies.
Infrastructure Delivery Plan, South Staffordshire Council, 2022	Sustainable development will not be achieved through the delivery of housing and employment development alone. The Infrastructure Delivery Plan sets out the Council's plans for supporting the delivery of infrastructure in the district, including social and community facilities, transport and utility services. This requires joint working between key partners and delivery agencies.	The LPR and SA should seek to match development with infrastructure delivery.
South Staffordshire Council Open Space Strategy (2020)	The Open Space Strategy sets out the existing open space provision in the district, including the availability of natural and semi-natural space. It also sets out the way forward for enhancing the safety, vibrancy and quality of open space and, in so doing, improving its suitability for children and young people whilst supporting good health and wellbeing of residents.	The LPR and SA should maintain existing open space provision and promote the provision of new and high-quality open space.
South Staffordshire District, Ageing Well Framework 2011	The ageing population of South Staffordshire is growing fast. This framework recognises that issue and lays out the facts, priorities and a plan for action for helping to ensure that older people in the district are health, independent, live in appropriate housing, are out and about and valued and involved, live in a safe environment and are financially secure.	The LPR and SA should consider the needs of the ageing population and ensure neighbourhoods are welcoming

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to population and material assets	Implications for the LPR and SA
		and accessible for residents of all ages.

A.8 Soil

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to soil	Implications for the LPR and SA
DEFRA: Safeguarding our Soils: A Strategy for England (2009)	<p>The Soil Strategy for England outlines the Government’s approach to safeguarding our soils for the long term. It provides a vision to guide future policy development across a range of areas and sets out the practical steps that are needed to take to prevent further degradation of our soils, enhance, restore and ensure their resilience, and improve understanding of the threats to soil and best practice in responding to them. Key objectives of the strategy include:</p> <ul style="list-style-type: none"> • Better protection for agricultural soils; • Protecting and enhancing stores of soil carbon; • Building the resilience of soils to a changing climate; • Preventing soil pollution; • Effective soil protection during construction and development; and • Dealing with our legacy of contaminated land. 	The LPR and SA should consider the recommended actions in this document to safeguard soils for the long term in South Staffordshire.
DEFRA (2012) Environmental Protection Act 1990: Part 2A. Contaminated Land Statutory Guidance	<p>This document establishes a legal framework for dealing with contaminated land in England. This document provides guidelines for how local authorities should implement the regime, including how they should go about deciding whether land is contaminated land in the legal sense of the term.</p> <p>Key aims are as follows:</p> <ul style="list-style-type: none"> • To identify and remove unacceptable risks to human health and the environment. • To seek to ensure that contaminated land is made suitable for its current use. • To ensure that the burdens faced by individuals, companies and society as a whole are proportionate, manageable and compatible with the principles of sustainable development. 	The LPR and SA should consider how contaminated land can be dealt with and include policies that promote the correct management of contaminated land.
National Planning Policy Framework (2023)	<p>The NPPF states that plans should prevent development from contributing to, or being put at risk of, air or water pollution.</p> <p>The NPPF states that planning should protect and enhance soils, particularly those recognised as best and most versatile agricultural land (Grades 1, 2 and 3a).</p>	The LPR and SA should adhere to the principles of the NPPF.

A.9 Water

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to water	Implications for the LPR and SA
Water Framework Directive 2000/60/EC	This provides an overarching strategy, including a requirement for EU Member States to ensure that they achieve 'good ecological status' by 2015. River Basin Management Plans were defined as the key means of achieving this. They contain the main issues for the water environment and the actions we all need to take to deal with them.	The SA Framework should include objectives that consider effects upon water quality and resource.
HM Government Strategy for Sustainable Construction (2008)	Encourages the construction industry to adopt a more sustainable approach towards development; identifies eleven themes for targeting Action, which includes conserving water resources.	The LPR and SA should consider how the water environment can be protected and enhanced and include policies that promote the sustainable use of water resources.
DEFRA The Water Environment (Water Framework Directive) (England and Wales) Regulations (2003)	<p>Requires all inland and coastal waters to reach "good status" by 2015. It mandates that:</p> <ul style="list-style-type: none"> • Development must not cause a deterioration in status of a waterbody; and • Development must not prevent future attainment of 'good status', hence it is not acceptable to allow an impact to occur just because other impacts are causing the status of a water body to already be less than good. <p>This is being done by establishing a river basin district structure within which demanding environmental objectives are being set, including ecological targets for surface waters.</p>	The SA Framework should include objectives that consider effects upon water quality and resource.
Environment Agency: Building a Better Environment: Our role in development and how we can help (2013)	Guidance on addressing key environmental issues through the development process (focusing mainly on the issues dealt with by the Environment Agency), including managing flood risk, surface water management, use of water resources, preventing pollution.	The LPR and SA should consider how the water environment can be protected and enhanced and include policies that promote the sustainable use of water resources.
Natural England Green Infrastructure Framework (2023)	The Green Infrastructure Framework is a commitment to the Governments 25 Year Environment Plan. The GI Framework supports the greening of towns and cities and looks to improve the surrounding landscapes as part of the Nature Recovery Network. The GI Framework will ensure that planning authorities and developers meet the requirements in the NPPF to consider GI in local plans and in new development. The GI Framework is underpinned by 15 principles based on the benefits of GI 'why' Principles, the descriptive or 'what' principles and the process or 'how' principles. The introduction of GI can reduce flood risk, improve water quality and provide natural filtration, and additionally maintain the natural water cycle and provide sustainable drainage.	The LPR and SA should consider the multifunctional benefits of GI and how these can be incorporated into the plan area.

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to water	Implications for the LPR and SA
A Green Future: Our 25 Year Plan to Improve the Environment (2018)	<p>The document sets out Government action to help achieve natural world regain and retain good health. The main goals of the Plan are to achieve:</p> <ul style="list-style-type: none"> • Clean air; • Clean and plentiful water; • Thriving plants and wildlife; • A reduced risk of harm from environmental hazards such as flooding and drought; • Using resources from nature more sustainably and efficiently; and • Enhanced beauty, heritage and engagement with the natural environment. <p>The Plan seeks to achieve clean and plentiful water by:</p> <ul style="list-style-type: none"> • Reducing the damaging abstraction of water from rivers and groundwater, ensuring that by 2021 the proportion of water bodies with enough water to support environmental standards increases from 82% to 90% for surface water bodies and from 72% to 77% for groundwater bodies; • Reaching or exceeding objectives for rivers, lakes, coastal and ground waters that are specially protected, whether for biodiversity or drinking water as per our River Basin Management Plans; • Supporting OFWAT's ambitions on leakage, minimising the amount of water lost through leakage year on year, with water companies expected to reduce leakage by at least an average of 15% by 2025; and • Minimising by 2030 the harmful bacteria in our designated bathing waters and continuing to improve the cleanliness of our waters. We will make sure that potential bathers are warned of any short-term pollution risks. <p>The 2021 Environment Act embeds several of these aspects into the new legislation.</p>	<p>The LPR and SA should consider the vision and principles of the 25 Year Plan to improve the quality of the UK's waters to be close to their natural state, and respecting nature in how we use water.</p>
Environmental Improvement Plan 2023	<p>The Environmental Improvement Plan (EIP) 2023 for England is the first revision of the 25YEP. It builds on the 25YEP vision with a new plan setting out how the government will work with landowners, communities and businesses to deliver each of the goals for improving the environment, matched with interim targets to measure progress. Taking these actions will help to restore nature, reduce environmental pollution, and increase the prosperity of our country. To achieve clean and plentiful water, the EIP sets out to:</p> <ul style="list-style-type: none"> • Tackle nutrient pollution, including by upgrading 160 wastewater treatment works by 2027 and providing increased advice and incentives to support a shift to sustainable agricultural techniques; • Restore 400 miles of river through the first round of Landscape Recovery projects and establish 3,000 hectares of new woodlands along England's rivers; and • Roll out water efficiency labelling across appliances and ensure water companies deliver a 50% reduction in leakages by 2050. 	<p>The LPR and SA should consider how environmental challenges can be addressed and environmental goals can be met.</p>
Environment Agency: Water for people and the environment: A	<p>The strategy looks at the steps needed, in the face of climate change, to manage water resources to the 2040s and beyond, with the overall aim of improving the environment while allowing enough water for human uses.</p>	<p>The LPR and SA should consider how the water environment can be protected and enhanced and include policies that promote the</p>

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to water	Implications for the LPR and SA
Strategy for England and Wales (2009)		sustainable use of water resources.
Severn and Humber River Basin Management Plans (2022)	<p>The aim of river basin management plans (RBMPs) is to enhance nature and the natural water assets that are the foundation of everyone’s wealth, health and wellbeing, and the things people value, including culture and wildlife. Each RBMP contains the following.</p> <ul style="list-style-type: none"> • The local environmental objectives for water bodies and protected areas that government, the Environment Agency, and other public bodies use to: <ul style="list-style-type: none"> ○ make planning decisions ○ decide on the conditions to include in environmental permits ○ target action, including informing funding decisions • An assessment of the current condition of each water body and, if it is not in good condition, the reasons why. • Summaries of the programmes of measures, including: <ul style="list-style-type: none"> ○ the government’s legal and administrative framework for protecting and improving waters in England ○ current and planned programmes of improvement actions ○ principles to be followed when choosing future actions ○ summaries at a catchment scale, including the local catchment partnership’s vision and priorities for future action 	<p>The LPR and SA should aim to be in accordance with the RBMPs for the Severn and Humber River basins. In particular, any potential impact on the ecological, chemical or quantitative status of waterbodies should be addressed.</p>
Severn River Basin Flood Risk Management Plan 2021-2027	<p>Flood risk management plans (FRMPs) explain the risk of flooding from rivers, the sea, surface water, groundwater and reservoirs. FRMPs set out how risk management authorities will work with communities to manage flood and coastal risk over the period 2021-2027.</p> <p>The FRMP helps to promote a greater awareness and understanding of the risks of flooding, particularly in those communities at high risk, and encourage and enable householders, businesses and communities to take action to manage the risks. The FRMP provides the evidence to support flood and coastal risk management decision making. The highest priority is to reduce risk to life. The Severn River basin district is divided into eight management catchments, five within England and three located on the border of England and Wales. A total of 10 flood risk area have been identified within the Severn River basin district, five for significant risk of flooding from main rivers and the sea and five for significant risk of flooding from surface water.</p>	<p>LPR should take into consideration the areas at risk of flooding to avoid locating vulnerable development in areas of incompatible risk.</p>
Humber River basin Flood risk management plan 2021-2027	<p>Flood risk management plans (FRMPs) explain the risk of flooding from rivers, the sea, surface water, groundwater and reservoirs. FRMPs set out how risk management authorities will work with communities to manage flood and coastal risk over the period 2021-2027. The river basin district comprises 16 river catchments. Within the Humber River basin district there are 38 flood risk areas for significant risk of flooding from main rivers and the sea, 12 flood risk areas for significant risk of flooding from surface water, and two flood risk areas for significant risk of flooding from main rivers and the sea. Flood risk areas are areas with a high risk of surface water flooding.</p>	<p>Development proposed in the LPR should take into consideration the areas at risk of flooding to avoid locating vulnerable development in areas of incompatible risk.</p>

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to water	Implications for the LPR and SA
River Severn catchment flood management plan (2009)	The catchment flood management plan should be used to inform planning and decision making. The overall aim is to promote more sustainable approaches to managing flood risk.	LPR should take into consideration the areas at risk of flooding to avoid locating vulnerable development in areas of incompatible risk.
Severn Trent Water, Water Resource Management Plan (2019)	The Plan sets out how Severn Trent Water maintains the balance between supply and demand for water. Their priorities for the future include keeping bills for customers at a minimum, taking a fair and balanced approach for all stakeholders and delivering long term environmental benefits.	Development proposed in the LPR should seek to be in accordance with the future plans of the Severn Trent WRMP.
Staffordshire Local Flood Risk Management Strategy (December 2015)	This is about managing flooding in Staffordshire. The Local Flood Risk Management Strategy sets out roles and responsibilities for flood risk management, assesses the risk of flooding in the County, where funding can be found to manage flood risk, what our policies are as a Lead Local Flood Authority and what our objectives and actions are to manage flood risk.	Discord between development and policies proposed in the LPR and this strategy should be avoided.
Staffordshire Preliminary Flood Risk Assessments (PFRA) (2017, Addendum)	This assessment summarises the findings from the first two stages of the flood risk management cycle for the County of Staffordshire and presents the results of a high-level screening exercise, identifying areas of significant flood risk. An update to the original 2011 report was done at the end of 2017.	Development proposed in the LPR should take into consideration the areas at risk of flooding to avoid locating vulnerable development in areas of incompatible risk.
Strategic Flood Risk Assessment, South Staffordshire Council, 2019	<p>The key objectives of the Level 1 Strategic Flood Risk Assessment are to:</p> <ul style="list-style-type: none"> • Inform the SSCs Local Plans by assessing flood risk from all sources, current and future. • Identify which locations are most and least vulnerable to flooding from all relevant sources. • Produce a comprehensive set of maps presenting flood risk from all sources that can be used as evidence base for flood management purposes. • Provide sufficient detail to enable the Sequential Test to be applied to inform allocations of land for development. • Provide clear advice for developers undertaking site-specific flood risk assessments. • Assess or identify existing and proposed flood defences and the maintenance requirements of these defences. • Summarise the role that the Lead Local Flood Authority will play in the management of flood risk. • Consider outputs from the Preliminary Flood Risk Assessment and any local flood risk strategies. • Take into account climate change. • Assess the cumulative impact that development will have on flood risk. 	Development proposed in the LPR should take into consideration the areas at risk of flooding to avoid locating vulnerable development in areas of incompatible risk.
Southern Staffordshire Water Cycle Study (2020)	The WCS considers the issues of flood risk, water resources, water supply, wastewater collection, wastewater treatment, water quality, environmental issues and demand management. It offers a relatively detailed look on the potential development in the area and the implications this may have for each of these issues.	Development proposed in the LPR should seek to take on board the advice and constraints noted in the WCS.

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to water	Implications for the LPR and SA
South Staffs Water, Water Resource Management Plan 2020	<p>South Staffs Water provides water supply across part of the LPR area and sewerage services across the entire LPR area. The Water Resources Management Plan (WRMP) sets out how South Staffs Water plans to maintain the balance between supply and demand for water. This includes forecasting future supply and demand and proposing measures to align these two. Priorities of the plan include leakage reduction, improved efficiency, a higher proportion of metered customers, improved levels of service and better protection for the environment.</p> <p>The WRMP will be updated every 5 years, with the next iteration covering 2025 to 2050 in draft form at the time of writing.</p>	<p>The LPR and SA should consider how the water environment can be protected and enhanced, and promote the sustainable use of water resources.</p>

Appendix B: SA Framework for the South Staffordshire LPR

#	SA Objective	Decision making criteria: Will the option / proposal...	Indicators include (but are not limited to)
1	<p>Climate Change Mitigation: Minimise South Staffordshire’s contribution to climate change.</p>	<ul style="list-style-type: none"> • Help to reduce energy consumption or GHG emissions? • Generate or support renewable energy? 	<ul style="list-style-type: none"> • Energy consumption • GHG emissions • Access to sustainable transport • Provision and connectivity of green infrastructure
2	<p>Climate Change Adaptation: Plan for the anticipated impacts of climate change.</p>	<ul style="list-style-type: none"> • Avoid development in areas at high risk of flooding and seek to reduce flood risk? • Promote use of technologies and techniques to adapt to the impacts of climate change? 	<ul style="list-style-type: none"> • EA Flood Map for Planning • Extent of surface water flood risk • The number of developments given planning permission on floodplains contrary to EA advice • Presence or loss of green infrastructure
3	<p>Biodiversity and Geodiversity: Protect, enhance and manage the flora, fauna, biodiversity and geodiversity assets of the district.</p>	<ul style="list-style-type: none"> • Protect or enhance wildlife sites or biodiversity hotspots? • Protect or enhance geodiversity hotspots? • Deliver biodiversity net gain? 	<ul style="list-style-type: none"> • Number of planning approvals which generate adverse impacts on sites of biodiversity importance • Quality and extent of priority habitats • Percentage of major development generating overall biodiversity enhancement • Hectares of biodiversity habitat delivered through strategic site allocations • Impacts on geodiversity sites
4	<p>Landscape and Townscape: Conserve, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening their distinctiveness.</p>	<ul style="list-style-type: none"> • Protect or enhance the local landscape? • Protect or enhance the local townscape? • Safeguard and enhance the character of the landscape and local distinctiveness and identity? 	<ul style="list-style-type: none"> • Use of locally sourced materials • Impacts on existing setting • Alteration of the urban / rural fringe • Increase the risk of coalescence • Amount of new development in the AONB with commentary on likely impact

#	SA Objective	Decision making criteria: Will the option / proposal...	Indicators include (but are not limited to)
5	Pollution and Waste: Reduce waste generation, increase the reuse of, and recycling of, materials whilst minimising the extent and impacts of water, air and noise pollution.	<ul style="list-style-type: none"> Encourage recycling, re-use and composting of waste and reduce the total quantity of waste produced? Improve air quality and avoid generating further air pollution? Conserve and improve water quality? Help to reduce noise pollution and protect sensitive receptors from existing ambient noise? 	<ul style="list-style-type: none"> Number of residents in areas of poor air quality Proximity to pollutants (e.g. busy roads, airports) Quality of waterways in or adjacent to sites Local increases in road traffic or congestion The number of developments given planning permission contrary to Environment Agency advice relating to river water quality or the protection of groundwater Proximity to AQMAs and current AQMA status
6	Natural Resources: Protect, enhance and ensure the efficient use of the district's land, soils and water.	<ul style="list-style-type: none"> Promote water efficiency? Re-use previously developed land or existing buildings? Help to conserve or minimise the loss of local soils? 	<ul style="list-style-type: none"> Proportion of previously developed land Likely impacts on soil fertility, structure and erosion Agricultural Land Classification Mineral Safeguarding Sites Re-use of contaminated land
7	Housing: Provide a range of housing to meet the needs of the community.	<ul style="list-style-type: none"> Ensure that residents will have the opportunity to live in a home which meets their needs? Provide a mix of good-quality housing, including homes that are suitable for first-time buyers? 	<ul style="list-style-type: none"> Proportion of affordable housing Impacts on existing houses and estates Number of extra care homes Total number of homes planned for site Provision of pitches and plots for Gypsies, Travellers and Travelling Showpeople
8	Health and Wellbeing: Safeguard and improve the physical and mental health of residents.	<ul style="list-style-type: none"> Provide residents with adequate access to necessary health facilities and services? Encourage healthy lifestyles? 	<ul style="list-style-type: none"> Access to health facilities Percentage of district's population with access to a natural greenspace within walking distance of their home Local air quality Hectares of accessible open space per 1,000 population

#	SA Objective	Decision making criteria: Will the option / proposal...	Indicators include (but are not limited to)
9	Cultural Heritage: Conserve, enhance and manage sites, features and areas of historic and cultural importance.	<ul style="list-style-type: none"> Will the proposal conserve or enhance heritage assets and their setting? Will the proposal conserve or enhance the historic environment? 	<ul style="list-style-type: none"> Number of listed buildings, archaeological sites, scheduled monuments and registered parks and gardens adversely impacted by development Quantity of development which is discordant with the relevant management plans but given planning permission in Conservation Areas Number and condition of historic assets on the Heritage at Risk register.
10	Transport and Accessibility: Improve the choice and efficiency of sustainable transport in the district and reduce the need to travel.	<ul style="list-style-type: none"> Improve travel choice, reduce journey need and shorten the length and duration of journeys? Improve accessibility to key services and amenities for existing and new residents? 	<ul style="list-style-type: none"> Distance and accessibility to public transport options Distance and accessibility to key services and amenities, as well as employment opportunities Suitability of existing routes of access into sites, considering anticipated increases in usage
11	Education: Improve education, skills and qualifications in the district.	<ul style="list-style-type: none"> Raise educational attainment levels for residents in the district? Offer residents with frequent, affordable and sustainable access to educational facilities? 	<ul style="list-style-type: none"> Distance and accessibility to educational facilities, including primary and secondary schools Local education attainment levels
12	Economy and Employment: To support a strong, diverse, vibrant and sustainable local economy to foster balanced economic growth.	<ul style="list-style-type: none"> Encourage sustainable economic growth? Ensure high and stable levels of employment? 	<ul style="list-style-type: none"> Access and distance to local employment opportunities Local employment rates Quantity of employment land in the district Support for sustainable businesses

Appendix C: Consultation Responses from Statutory Bodies

1.1 Overview

1.1.1 **Tables C.1 to C.5** provide a summary of the consultation responses received regarding the SA from the statutory bodies (the Environment Agency, Historic England and Natural England) at each stage of the iterative SA process, and indicate how the comments received have influenced the SA.

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

Consultee	Summary, and selected extracts from, consultation response to the SA Scoping Report	How the consultation response has influenced the SA
<p>Environment Agency</p>	<ul style="list-style-type: none"> We note that flooding is addressed under the sustainability theme of Climate Change, and not under Soils & Water. We have no objection to this, however it should be noted that flooding is not a problem which is solely caused by climate change, and as such could just as easily sit under Soils & Water. We would recommend that some linkage is made between these two themes. We would also like to point out that the ecology of rivers sits under two Sustainability Themes – Biodiversity & Geodiversity and Soils & Water. We recommend that this is acknowledged within the report, as it currently not referenced. Chapter 5 - This section addresses issues relating to Biodiversity & Geodiversity, however it does not include any reference to the Humber and Severn River Basin Management Plans which classify the Ecological Status of waterbodies, and set targets for their improvement. These documents should be referenced within the Summary of PPP, and should also feed into the baseline data for local state of water-based ecology. We recommend section 6.2 references the climate change allowances for flood risk available as part of the NPPG here https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances. SA Objective 2: climate change adaptation, lists the EA fluvial flood risk zones as an indicator. We query whether this should more accurately say 'EA Flood Map for Planning', or if the vague terminology is deliberate to encompass all our flood mapping outputs. We suggest that you may wish to add into the criteria and indicators 'the number of developments given planning permission on floodplains contrary to Environment Agency advice'. We query whether there are any other non-flood related adaptation criteria or indicators that could be used to give a broader scope to this objective. SA Objective 6: Natural Resources could use Environment Agency data on water quality objections to indicate success, with criteria such as will development cause pollution of the water environment?. As such, the Indicator could be 'the number of developments given planning permission contrary to Environment Agency advice relating to river water quality or the protection of groundwater' - Target: no planning permissions to be granted contrary to Environment Agency advice on water quality grounds The following documents should be added for consideration within the SEA/SA process: 	<ul style="list-style-type: none"> The Regulation 19 SA Report includes Chapters 7-15 which relate to topics identified in Schedule 2 of the SEA Regulations including Soil and Water separately. These chapters draw on information from relevant SA Objectives assessed throughout the SA process including multiple objectives where necessary. The SA Scoping Report was updated to reflect the points raised. Additionally, the Humber and Severn RBMPs are discussed within Chapter 8 of the Regulation 19 SA Report which focuses on biodiversity, flora and fauna, as well as Appendix A (PPP Review), and have informed the SA process. The SA Scoping Report was updated to reflect the points raised, and climate change allowances are also discussed within Chapter 15 of the Regulation 19 SA Report which focuses on water. The SA Framework criteria and indicators have been updated throughout the iterative SA process to include various recommendations; the latest version is presented in Appendix B of the Regulation 19 SA Report. Issues with regard to water pollution are considered under SA Objective 5: Pollution and Waste, as opposed to SA Objective 6: Natural Resources. The PPP Review has evolved over the iterative plan-making process; the latest

Consultee	Summary, and selected extracts from, consultation response to the SA Scoping Report	How the consultation response has influenced the SA
	<ul style="list-style-type: none"> ○ Preliminary Flood Risk Assessments (PFRAs) were originally published in 2011 under the Floods Directive and are in the process of being revised for publication in December 2017. ○ Flood Risk Management Plans (FRMPs) were published in March 2016. ○ Local Plans, Policies and Programmes should include the Staffordshire Local Flood Risk Management Strategy which includes policies, objectives and priorities for Staffordshire and an action plan for managing flood risk. ○ Your Strategic Flood Risk Assessment (SFRA) should be included, although this will require updating to support the Local Plan Review. ○ River Basin Management Plans should be included to reflect the current status of the water environment and to inform on the actions identified to bring your waterbodies up to Good Status as required by the Water Framework Directive. 	<p>version is presented in Appendix A of the Regulation 19 SA Report.</p>
<p>Historic England</p>	<ul style="list-style-type: none"> • Within paragraph 9.1.1 we would recommend that the section deals with protecting, and where possible, enhancing all heritage assets, designated and undesignated. We support the reference to historic landscapes. Paragraph 9.1.2 refers to regional guidance, is it possible to clarify which guidance this refers to? • We would recommend that paragraph 9.2.1 refers to heritage assets, in line with National Planning Policy Framework (NPPF) terminology. Further heritage assets are protected through a variety of legislation, as well as national policy, not just 'conditions' attached to planning applications. • Appendix A, Section 9, we would recommend that the question raised is whether the policy or proposal conserves and where possible enhances, heritage assets/ the historic environment. In the indicator section – we would recommend that there is a net reduction in at risk heritage assets, no increase in at risk or damage to heritage assets as a result of policies and proposals in the Local Plan. Where the indicator section states that 'impacts to xxx' what is the aim? No negative impacts for example? We would recommend that targets are included in order to measure the success of the Local Plan. • Within the section on Plans and Programmes, we note the reference to Conservation Principles, which we support. Please be aware that a review of this document is currently available for consultation and it may be useful to refer to this updated version. We would further recommend listing the three Good Practice Advice Notes and our range of Historic Environment Advice Notes within the section on relevant plans, as these advice documents will assist in the delivery of the local plan review. This will also help to update the documents currently listed in this version of the SEA/SA. 	<ul style="list-style-type: none"> • The SA Scoping Report was updated to reflect the points raised. • Additionally, Chapter 10 of the Regulation 19 SA focuses on cultural heritage and brings together the updated baseline information and potential impacts on the historic environment identified throughout the SA process. • The SA Framework criteria and indicators have been updated throughout the iterative SA process to include various recommendations; the latest version is presented in Appendix B of the Regulation 19 SA Report. • The PPP Review has evolved over the iterative plan-making process; the latest version is presented in Appendix A of the Regulation 19 SA Report.

Consultee	Summary, and selected extracts from, consultation response to the SA Scoping Report	How the consultation response has influenced the SA
Natural England	<ul style="list-style-type: none"> • 5. Biodiversity and Geodiversity - Whilst we acknowledge that paragraph 5.2.3 recognises the importance of Cannock Chase SAC and the need for appropriate mitigation measures to be applied to new development proposals, it does not specifically mention the Strategic Access Management & Monitoring (SAMM) measures agreed by the SAC Partnership which should be followed. These measures will facilitate sustainable residential development while safeguarding the SAC. We acknowledge that in Box 5.1 the report recognises that it will be necessary to ensure that there will be no likely significant effects of the Local Plan Review on Motte Meadows SAC or Cannock Chase SAC via a Habitat Regulations Assessment. • 6. Climate Change - In Box 6.1 which sets out key climate change issues for South Staffordshire we welcome the recognition that green infrastructure should be enhanced and expanded. • 8. Health - Natural England particularly welcomes paragraph 8.2.7 which recognises the benefits of natural habitats and green space on physical and mental health and well-being. • 11. Landscape and Townscape - We welcome reference to the National Character Areas (NCA). We also welcome the inclusion of tranquillity at paragraph 11.2.7 and the acknowledgement in Box 11.1 that development should seek to be in accordance with the Cannock Chase Management Plan. • 14. Water and Soil - Whilst we generally welcome this section we suggest that paragraph 14.2.5 requires clarification. Natural England does not classify agricultural land as such but has a statutory role in advising local planning authorities about land quality issues and refers to the Agricultural Land Classification (ALC) Strategic Map information. We advise that the Local Plan should comply with the guidance set out at paragraph 118 of the NPPF i.e. that the Local Plan should recognise that development (soil sealing) has an irreversible adverse (cumulative) impact on the finite national and local stock of BMV land. Avoiding loss of BMV land is the priority as mitigation is rarely possible. Retaining higher quality land enhances future options for sustainable food production and helps secure other important ecosystem services. In the longer term, protection of BMV land may also reduce pressure for intensification of other land. • Appendix A: SA Framework - Natural England generally welcomes the SA Objectives and Framework. We note that the framework sets out indicators for each objective which are intended to monitor the significant environmental effects of implementing the local plan review. As far as the indicators for the natural environment are concerned it is important that any monitoring indicators relate to the effects of the plan itself, not wider 	<ul style="list-style-type: none"> • Chapter 8 of the Regulation 19 SA focuses on biodiversity, flora and fauna and includes reference to potential effects on Habitats sites including Cannock Chase SAC. Mitigation including SAMMMs are discussed within Box 8.2. • Lepus agree that conservation and enhancement of multi-functional green infrastructure is a key consideration for local plans. Green infrastructure and climate change adaptation are cross-cutting themes throughout the SA Objectives and are discussed within the Regulation 19 SA, notably within Chapter 8 (biodiversity, flora and fauna), Chapter 9 (climatic factors) and Chapter 11 (human health). • Impacts on tranquillity arising as a result of the LPR have been brought out in Chapter 12 of the Regulation 19 SA Report. • The SA Scoping Report was updated to reflect the points raised. • Additionally, issues relating to loss of BMV land are discussed further within Chapter 14 of the Regulation 19 SA Report which focuses on soil. • The SA Scoping Report was updated to reflect the points raised. The SA Framework criteria and indicators have been updated throughout the iterative SA process to include various recommendations; the latest version is presented in Appendix B of the Regulation 19 SA Report.

Consultee	Summary, and selected extracts from, consultation response to the SA Scoping Report	How the consultation response has influenced the SA
	<p>changes. Bespoke indicators should be chosen relating to the outcomes of development management decisions.</p> <ul style="list-style-type: none"> • Whilst it is not Natural England’s role to prescribe what indicators should be adopted, the following indicators may be appropriate. <ul style="list-style-type: none"> ○ Biodiversity: <ul style="list-style-type: none"> ▪ Number of planning approvals that generated any adverse impacts on sites of acknowledged biodiversity importance. ▪ Percentage of major developments generating overall biodiversity enhancement. ▪ Hectares of biodiversity habitat delivered through strategic site allocations. ○ Landscape: <ul style="list-style-type: none"> ▪ Amount of new development in the AONB with commentary on likely impact. ○ Green infrastructure: <ul style="list-style-type: none"> ▪ Percentage of the District’s population having access to a natural greenspace within 400 metres of their home. ▪ Length of greenways constructed. ▪ Hectares of accessible open space per 1000 population. • Appendix B: Plans, Policy and Programme Review - In general we acknowledge that the Scoping Report has referenced a wide range of documents that are relevant to Biodiversity, Flora and Fauna. We note particularly that the Site Improvement Plan for Cannock Chase Special Area of Conservation and the Cannock Chase AONB Management Plan have been included. However we suggest that you may want to consider including reference to the Staffordshire Biodiversity Action Plan http://www.sbap.org.uk/ and any other relevant local documents. 	<ul style="list-style-type: none"> • The PPP Review has evolved over the iterative plan-making process; the latest version is presented in Appendix A of the Regulation 19 SA Report.

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

Consultee	Summary, and selected extracts from, consultation response to the Regulation 18 (I) SA	How the consultation response has influenced the SA
<p>Environment Agency</p>	<ul style="list-style-type: none"> It should be ensured that the above comments and upcoming SFRA and WCS evidence base are reflected within the SA and future drafts, particularly in relation to the levels and spatial distribution of new growth. We note that the indicators relating to climate change adaption all relate to impacts on the water environment and ecology, and query whether there are any indicators which can also reflect impacts on human health, infrastructure, transport etc. <i>Section 3.54: Open countryside</i> – It is possible (if development is well designed) for developed land to have greater biodiversity value than green belt. In the case of intensive arable farming this is almost always the case as intensive farming practices leave very little space for biodiversity and the use of chemical fertilizers, pesticides etc. then pollute and poison what little remaining biodiversity is hanging on. Similarly many brownfield sites that have been left untouched for many years also frequently have more biodiversity than the average urban park due to the intensive management and use of non-native species that parks traditionally use. To assume that greenbelt is always of biodiversity value and that a brownfield is not is nonsensical almost every site needs to be assessed for its own merits. For this reason we support Option B. <i>Section 5.35: Landscape character</i> – Linear features such as hedgerows, watercourses need to be afforded protection within the landscape but also given sufficient room to allow natural processes such as functioning floodplains to proceed unhindered. We would be happy to feed into related SPDs. Our preferred Option is therefore B. 	<ul style="list-style-type: none"> The findings from the latest available SFRA and WCS information at the time of writing have informed the SA and are discussed within Chapter 15 of the Regulation 19 SA Report. Impacts of flooding on human health and infrastructure have been discussed for each spatial option under SA Objective 2 – Climate Change Adaptation within the Issues and Options SA. The Regulation 19 SA Report includes Chapters 7-15 which relate to topics identified in Schedule 2 of the SEA Regulations including Climatic Factors, Human Health and Population and Material Assets (including infrastructure and transport). These chapters draw on information from relevant SA Objectives assessed throughout the SA process including multiple objectives where necessary. It is acknowledged that brownfield land can be of environmental or biodiversity value. This is discussed further within Chapter 8 of the Regulation 19 SA Report. Option B performed the best in the SA assessment presented in the Issues and Options SA. Multi-functional green infrastructure is a cross-cutting theme throughout the SA Objectives and is discussed within the Regulation 19 SA, notably within Chapter 8 (biodiversity, flora and

Consultee	Summary, and selected extracts from, consultation response to the Regulation 18 (I) SA	How the consultation response has influenced the SA
		fauna), Chapter 9 (climatic factors) and Chapter 11 (human health).
Historic England	Appendix A - We look forward to developing the decision making criteria and indicators for the historic environment as the Plan progresses and when it becomes more clear which options for growth will be pursued. The following document may be of use to you at this time: < https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/ >	The SA Framework criteria and indicators have been updated throughout the iterative SA process to include various recommendations; the latest version is presented in Appendix B of the Regulation 19 SA Report.
Natural England	The reliance on the private car for transport will need to be considered in relation to Sustainability Appraisal e.g. with regard to air quality impacts from increased traffic generation.	Residents' reliance on private car use has been discussed for each spatial option under SA Objective 5 – Pollution and Waste and SA Objective 10 – Transport and accessibility. Furthermore, Chapter 7 of the Regulation 19 SA focuses on air, and references private car use as a primary source of poor air quality within the plan area. This is also a relevant point that is brought out in several other SEA topic chapters including Chapter 9 (climatic factors) and Chapter 11 (human health).

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

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

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

Consultee	Summary, and selected extracts from, consultation response to the Regulation 18 (III) SA	How the consultation response has influenced the SA
Environment Agency	No specific comments regarding the SA.	N/A
Historic England	No specific comments regarding the SA.	N/A
Natural England	<ul style="list-style-type: none"> Having seen Table 6.1 assessment for Wheaton Aston, we would like to understand further how site 610 for example was selected when site 614 scored better. We note that the report has not been able to undertake a comprehensive assessment of impacts on best and most versatile land classed as grade 1,2,3a in the agricultural land classification due to a lack of site specific ALC studies. How is the Council justifying allocating on BMV land? 	<ul style="list-style-type: none"> The outline reasons for selection and rejection of each reasonable alternative site assessed throughout the SA process is set out in Appendix I of the Regulation 19 SA Report. In line with the precautionary principle, and in absence of site-specific surveys to identify ALC subgrades 3a and 3b, the SA has assumed that Grades 1, 2 and 3 could represent some of South Staffordshire’s BMV land. Methodological assumptions and limitations of the high-level assessment that has been carried out are set out within Appendix D of the Regulation 19 SA Report.

Table C.5: Consultation comments received from statutory consultees in response to the previous Regulation 19 SA Report (2022)

Consultee	Summary, and selected extracts from, consultation response to the previous Regulation 19 SA	How the consultation response has influenced the SA
Environment Agency	<ul style="list-style-type: none"> Chapter 3.5 of the SFRA addresses the need for these site allocations to be supported by a Sequential Test to demonstrate there is no other land reasonably available at a lower risk of flooding in line with NPPF paragraph 162. Figure 3-1 summarises the Sequential Test and further guidance on how it should be applied is included within the recently updated NPPG. As the SFRA states, <i>'the Sequential Test can be undertaken as part of a Local Plan Sustainability Appraisal. Alternatively, it can be demonstrated through a free-standing document, or as part of Strategic Housing Land or Employment Land Availability Assessments.'</i> The SFRA states that <i>'For South Staffordshire, the Sequential test has been undertaken collaboratively with Staffordshire County Council as LFFA. Sites were first screened based on fluvial flood zones Following the initial screening of sites, the LLFA was consulted and sites with flood risk issues that could not be mitigated were filtered out. Sites at risk of flooding from smaller watercourses (not covered by Flood Zones) or at risk from other sources of flooding (including surface water) were taken forward for a Level 2 assessment (see Appendix A).'</i> Although referenced within the Sustainability Appraisal it is unclear where the evidence sits to clearly demonstrate how the proposed site allocations have had the Sequential Test applied as is required by Paragraphs 161 and 162 of the NPPF. We recommend this is clearly signposted as part of the Examination to ensure clear compliance with the NPPF. 	The Sequential Test has been carried out separately to the SA and will be published alongside the LPR as part of the evidence base.
Historic England	<ul style="list-style-type: none"> We are supportive of a specific indicator for cultural heritage and an assessment of the key issues that heritage faces as a result of the development pressure within the Borough. We welcome a section on the consideration of reasonable alternatives within the Report. We note the comments in Table N.11 on page N37 in the SEA 2022 Volume I Report and consider that ensuring that appropriate mitigation measures that have been identified throughout the HESA Reports, are stated within the Plan under relevant site policies to minimise the harm to heritage both individually and cumulatively. Table 6.5 from page 46 cites a '0' effect for heritage for all sites bar 036c. It is disappointing that there are no sites which have incurred a 'positive' for the historic environment. Given the comments in the HESA 2022 Report and in the SA/SEA Report Volume I (as above) we consider it likely that there are residual negative effects for the historic environment, which makes the appropriate mitigation measures necessary. We are supportive of the range of policies within the Plan which seek to consider the impacts for the historic environment and conserve heritage assets. 	<p>The post-mitigation assessments as presented in Appendix H identified that potential adverse effects arising from reasonable alternative sites on cultural heritage are likely to be mitigated through LPR policy provisions.</p> <p>Overall, the SA identified a negligible effect of the proposed development on heritage assets and their settings, although it was considered that a residual adverse effect on the wider historic character would remain (see Box 10.3).</p>
Natural England	No specific comments regarding the SA.	N/A

Appendix D: Methodological Assumptions

Appendix D Contents

D.1	Introduction.....	D1
D.2	SA Objective 1 - Climate Change Mitigation	D2
D.3	SA Objective 2 - Climate Change Adaptation	D5
D.4	SA Objective 3 - Biodiversity and Geodiversity	D7
D.5	SA Objective 4 – Landscape and Townscape.....	D11
D.6	SA Objective 5 – Pollution and Waste	D16
D.7	SA Objective 6 – Natural Resources	D20
D.8	SA Objective 7 – Housing	D22
D.9	SA Objective 8 – Health and Wellbeing	D23
D.10	SA Objective 9 – Cultural Heritage	D26
D.11	SA Objective 10 – Transport and Accessibility	D28
D.12	SA Objective 11 – Education	D30
D.13	SA Objective 12 – Economy and Employment	D31

Boxes

Box D.2.1:	SA Objective 1: Climate Change Mitigation assessment methodology.....	D4
Box D.3.1:	SA Objective 2: Climate Change Adaptation assessment methodology	D6
Box D.4.1:	SA Objective 3: Biodiversity and Geodiversity assessment methodology	D10
Box D.5.1:	SA Objective 4: Landscape and Townscape assessment methodology.....	D14
Box D.6.1:	SA Objective 5: Pollution and Waste assessment methodology.....	D19
Box D.7.1:	SA Objective 6: Natural Resources assessment methodology	D21
Box D.8.1:	SA Objective 7: Housing assessment methodology.....	D22
Box D.9.1:	SA Objective 8: Health and Wellbeing assessment methodology.....	D25
Box D.10.1:	SA Objective 9: Cultural Heritage assessment methodology	D27
Box D.11.1:	SA Objective 10: Transport and Accessibility assessment methodology	D29
Box D.12.1:	SA Objective 11: Education assessment methodology.....	D30
Box D.13.1:	SA Objective 12: Economy and Employment assessment methodology	D32

D.1 Introduction

D.1.1 Overview

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

D.2 SA Objective 1 - Climate Change Mitigation

D.2.1 Climate change

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

¹ AECOM (2020) 'Climate Change Adaptation and Mitigation: Final Report October 2020' Available at https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Planning%20Policy/New%20Stafford%20Borough%20Local%20Plan%202020-2040/Evidence%20Base%20Documents/Staffordshire_Final%20Report_Rev03%20%28Updates%29_2020-10-16_Accessibility_Comp....pdf [Date accessed: 14/11/23].

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

- D.2.1.7 The report goes on to set out the key climate risks in Staffordshire, “*The analysis presented in the report demonstrates that Staffordshire is exposed to seven key climate hazards; severe storms and gales, cold and snow, river flooding, surface water flooding, heat waves, drought and wildfires. Between them, these hazards present 20 climate risks and their associated impacts that new development could be exposed to in both current day and future scenarios, across the natural environment, infrastructure and the people and the built environment sectors. Climate change is expected to exacerbate and enhance the impacts experienced throughout Staffordshire, due to warmer, wetter-winters and hotter, drier summers, with an increase in the frequency and intensity of extreme weather events*”.
- D.2.1.8 The increase in GHG emissions caused by development proposals are associated with impacts of the construction phase, the occupation and operation of homes and businesses, energy and water consumption and increases in local road transport with associated emissions. This impact is considered to be permanent and non-reversible.
- D.2.1.9 The incorporation of green infrastructure (GI) within developments presents several opportunities to mitigate climate change, for example, through providing natural cooling to combat the ‘urban heat island’ effect, reducing the effects of air pollution and providing more pleasant outdoor environments to encourage active travel².
- D.2.1.10 However, it is assumed that development on previously undeveloped or greenfield land would result in an increase in GHG emissions due to the increase in the local population and the number of operating businesses and occupied homes.
- D.2.1.11 One potential method to estimate GHG emissions would be based on per capita calculations, using the UK local authority emissions statistics which is published by the Government annually³, based on the average number of people per dwelling and the proposed number of dwellings for new development sites. However, information regarding the capacity of reasonable alternative housing sites has not been available to inform the assessments. While site boundaries and site areas are known, as yet unknown on-site constraints may substantially affect housing capacity. The GHG emissions as a consequence of the allocation of sites is therefore recorded as uncertain.
- D.2.1.12 The estimated carbon emissions in South Staffordshire in 2021 was approximately 816,936 tonnes CO₂/year. The estimated carbon emissions per person per year was 7.4 tonnes⁴.

² TCPA (2018) Practical Guides for Creating Successful New Communities. Guide 7: Planning for Green and Prosperous Places. Available at: https://tcpa.org.uk/wp-content/uploads/2021/11/GC_PracticalGuide_GI_1.pdf [Date accessed: 14/11/23]

³ DBEIS (2023) UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2021. Available at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-greenhouse-gas-emissions-national-statistics-2005-to-2021> [Date accessed: 30/11/23]

⁴ Ibid

D.2.1.13 Sites proposed for employment or non-residential end use may present further negative effects on climate change; however, this would be dependent on the site-specific proposals and the nature of development, which is unknown at the time of assessment. Conversely, where renewable energy generation is incorporated within development, or proposed employment development locations would reduce commuting distances, potential adverse impacts could be offset, to some extent.

D.2.1.14 It should be noted that the appraisal of the LPR is limited in its assessment of carbon emissions, and greater detail of carbon data would help to better quantify effects. For example, specific carbon footprint data for the plan area would enable the SA process to evaluate changes to carbon emissions as a consequence of the plan in terms of (a) evolution of the baseline without the plan, and (b) effect on climate change through increased or decreased emissions, with the plan.

Box D.2.1: SA Objective 1: Climate Change Mitigation assessment methodology	
Climate change mitigation	Score
As the capacity at each residential-led development proposal and the nature of non-residential proposals are unknown at this stage of assessment, all site assessments have been identified as uncertain in regard to climate change mitigation.	+/-

D.3 SA Objective 2 - Climate Change Adaptation

D.3.1 Fluvial flooding

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

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

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

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

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

D.3.2 Surface water flooding

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

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

⁵ Environment Agency (2023) Risk of flooding from surface water – understanding and using the map. Available at: <https://environment.data.gov.uk/rofsw> [Date accessed: 13/11/23]

Box D.3.1: SA Objective 2: Climate Change Adaptation assessment methodology	
Fluvial flooding	Score
Where employment or Gypsy and Traveller-led development proposals coincide with Flood Zone 3, a major negative impact would be expected.	--
Residential-led development proposals that coincide with areas of Flood Zone 2 or 3 are assessed as having a minor negative impact on the climate change adaptation objective, as SSDC has excluded development from areas of Flood Zone 3.	-
Where employment or Gypsy and Traveller-led development proposals coincide with Flood Zone 2, a minor negative impact would be expected.	-
Where development proposals are located within Flood Zone 1, a minor positive impact is expected for climate change adaptation.	+
Surface water flooding	Score
Development proposals within areas at high risk of surface water flooding are assumed to have a major negative impact. This impact is considered to be frequent and short-term.	--
Development proposals in areas at low and medium risk of surface water flooding are assumed to have a minor negative impact. This impact is considered to be occasional and short-term.	-
Where development proposals are not located in areas determined to be at risk of surface water flooding, a negligible impact is expected for climate change adaptation.	0

D.4 SA Objective 3 - Biodiversity and Geodiversity

D.4.1 Biodiversity and geodiversity

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

Table D.4.1: Ecological receptors considered in this SA

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

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

D.4.2 Internationally and European designated sites

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

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

D.4.3 Nationally designated sites

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

⁶ SSSC (2023) Cannock Chase Special Area of Conservation (SAC). Available at: <https://www.staffordbc.gov.uk/cannock-chase-special-area-of-conservation-sac#:~:text=Around%2020%25%20of%20Cannock%20Chase,extensive%20in%20the%20Midlands%20region> [Date accessed: 14/11/23]

⁷ Natural England (2023) Natural England's Impact Risk Zones for Sites of Special Scientific Interest, 07 September 2023. Available at: <https://data.gov.uk/dataset/5ae2af0c-1363-4d40-9d1a-e5a1381449f8/ssi-impact-risk-zones> [Date accessed: 14/11/23]

D.4.4 Locally designated sites

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

⁸ Natural Environment and Rural Communities Act 2006. Available at:
<http://www.legislation.gov.uk/ukpga/2006/16/contents> [Date accessed: 14/11/23]

⁹ Natural England (2023) Priority Habitat Inventory (England). Available at: <https://data.gov.uk/dataset/4b6ddab7-6c0f-4407-946e-d6499f19fcde/priority-habitat-inventory-england> [Date accessed: 14/11/23]

Box D.4.1: SA Objective 3: Biodiversity and Geodiversity assessment methodology	
Biodiversity and geodiversity assets	Score
Where any part of a development site coincides with a SAC, SPA, Ramsar site, a SSSI, NNR or ancient woodland, or is adjacent to a SAC, SPA, Ramsar site or SSSI, it is assumed that development would have a permanent and irreversible impact on these nationally important biodiversity assets, and a major negative impact would be expected.	--
Where any part of a development site coincides with LNRs, SBIs, RIGS or priority habitats, is adjacent to an ancient woodland, NNR, LNR or SBI, is located within a SSSI IRZ which states to consult Natural England, is located within the zone of influence of a Habitats site or is located in close proximity to an NNR, LNR or stand of ancient woodland, it is assumed that development would have an impact on these biodiversity assets, and a minor negative impact would be expected.	-
Where any part of a development site is located within an IRZ which states that “any residential developments with a total net gain in residential units” or “residential development of 50 units or more” should be consulted on, a minor negative impact would be likely.	-
Where a development proposal would not be anticipated to impact a biodiversity or geodiversity asset, a negligible impact would be expected for this objective.	0

D.5 SA Objective 4 – Landscape and Townscape

D.5.1 Landscape and townscape

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

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

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

D.5.3 Green Belt Boundary Review

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

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

¹⁰ Cannock Chase Area of Outstanding Natural Beauty (2019) Cannock Chase Area of Outstanding Natural Beauty Management Plan 2019 – 2024. Available at: <https://cannock-chase.co.uk/wp-content/uploads/2019/10/AONB-Cannock-Chase-Management-Plan-2019-24.pdf> [Date accessed: 14/11/23]

¹¹ 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: 13/11/23]

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

D.5.4 Landscape Sensitivity Assessment

- D.5.4.1 Alongside the Green Belt Study, a Landscape Sensitivity Study¹² was undertaken, which forms Stage 3 of the Green Belt Study. As stated in the Green Belt Study, there is an interaction between the assessment of how parcels of land fulfil Green Belt purposes and the landscape character of the land,
- D.5.4.2 *"There is a relationship between landscape sensitivity and Green Belt contribution/harm in that physical elements which play a role in determining landscape character and sensitivity are also likely to play a role in the spatial relationship between urban areas and the countryside. However there are fundamental distinctions in the purposes of the two assessments, reflecting the fact that landscape quality is not a relevant factor in determining the contribution to Green Belt purposes, or harm to those purposes resulting from the release of land"*.

¹² LUC (2019) South Staffordshire Landscape Sensitivity Assessment. Available at: <https://www.sstaffs.gov.uk/local-plan-review-evidence-base> [Date accessed: 14/11/23]

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

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

D.5.5 Country Parks

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

D.5.6 Landscape Character Assessment

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

D.5.7 Views

D.5.7.1 In order to consider potential visual effects of development, it has been assumed that the development proposals would, broadly, reflect the character of nearby development of the same type.

D.5.7.2 Potential views from residential properties are identified using aerial photography.

D.5.7.3 It is anticipated that the SSDC will require developers to undertake Landscape and Visual Impact Assessments (LVIAs) or Landscape and Visual Appraisals (LVAs) to accompany any future proposals, where relevant. The LVIAs or LVAs should seek to provide greater detail in relation to the landscape character of the proposal and its surroundings, the views

¹³ Staffordshire County Council (2000) Planning for Landscape Change: Supplementary Planning Guidance to the Staffordshire and Stoke on Trent Structure Plan, 1996 – 2011. Volume 3: Landscape Descriptions. Available at: <https://www.staffordshire.gov.uk/environment/Environment-and-countryside/Documents/StaffordshireSPGVolume3.pdf> [Date accessed: 14/11/23]

available towards the development proposal, the character of those views and the sensitivity and value of the relevant landscape and visual receptors.

Box D.5.1: SA Objective 4: Landscape and Townscape assessment methodology	
Cannock Chase AONB	Score
Development proposals located within, partially within or adjacent to the AONB are expected to result in major negative impacts on the character and/or setting of the designated landscape.	--
Development proposals located in close proximity to the AONB are expected to result in negative impacts on the views experienced from the AONB and/or the setting of the designated landscape.	-
Green Belt Harm	Score
Development proposals located within areas of 'moderate-high', 'high' or 'very high' Green Belt harm.	--
Development proposals located within areas of 'low-moderate' or 'moderate' Green Belt harm.	-
Development proposals located within areas of 'low' sensitivity, or those not assessed in the study.	0
Landscape Sensitivity Study	Score
Development proposals located within areas of 'moderate-high' or 'high' landscape sensitivity.	--
Development proposals located within areas of 'low-moderate' or 'moderate' sensitivity.	-
Development proposals located within areas of 'low' sensitivity, or those not assessed in the study.	0
Landscape Character Assessment	Score
Development proposals which could potentially be discordant with the guidelines and characteristics provided in the published Supplementary Planning Guidance would be expected to have a minor negative impact on the landscape objective.	-
Development proposals located within areas classed as 'urban' within the Landscape Character Assessment, and therefore comprise built-up areas, would be expected to have a negligible impact on the landscape character.	0
Country Park	Score
Development proposals that are located adjacent or in close proximity to a Country Park, and therefore could potentially adversely affect views from Country Parks, are assumed to have a minor negative impact on the landscape objective.	-

Box D.5.1: SA Objective 4: Landscape and Townscape assessment methodology	
Views	Score
Development proposals which may alter views of a predominantly rural or countryside landscape experienced by users of the Public Rights of Way (PRoW) network and/ or local residents are assumed to have minor negative impacts on the landscape objective.	-
Urban sprawl/ coalescence	Score
Development proposals which are considered to increase the risk of future development spreading further into the wider landscape are assessed as having a minor negative impact on the landscape objective.	-
Development proposals which are considered to reduce the separation between existing settlements and increase the risk of the coalescence of settlements are assessed as having a potential minor negative impact on the landscape objective.	-
Overall	Score
Where a development proposal would not be anticipated to significantly impact the surrounding landscape, a negligible impact would be expected for this objective.	0

D.6 SA Objective 5 – Pollution and Waste

D.6.1 Air pollution

D.6.1.1 It is assumed that development proposals would result in an increase in traffic and thus traffic-related air pollution. Both existing and future site end users would be exposed to this change in air quality. At this stage of assessment, residential capacity at each site is unknown, and as such, it is uncertain the extent to which each development proposal could potentially increase air pollution in the local area.

D.6.1.2 Exposure of new residents to air pollution has been considered in the context of the proposal location in relation to established Air Quality Management Areas (AQMAs) and main roads. It is widely accepted that the effects of air pollution from road transport decreases with distance from the source of pollution i.e. the road carriageway. The Department for Transport (DfT) in their Transport Analysis Guidance (TAG) consider that, *"beyond 200m, the contribution of vehicle emissions from the roadside to local pollution levels is not significant"*¹⁴. This statement is supported by Highways England and Natural England based on evidence presented in a number of research papers^{15 16}. A buffer distance of 200m has therefore been applied in this assessment. A proposed site which lies wholly or partially within an AQMA or a 200m buffer, as described above, is assessed as having potential negative effects on new residents.

D.6.1.3 The proximity of a proposal in relation to a main road determines the exposure level of site end users to road related air and noise emissions¹⁷. In line with the DMRB guidance, it is assumed that site end users would be most vulnerable to these impacts within 200m of a main road. This distance has therefore been applied throughout this assessment to both existing road and rail sources. A proposed site which lies wholly or partially within a 200m buffer, as described above, is assessed as having potential negative effects on new residents.

D.6.2 Water pollution

D.6.2.1 The vulnerability of groundwater to pollution is determined by the physical, chemical and biological properties of the soil and rocks, which control the ease with which an unprotected hazard can affect groundwater. Groundwater Source Protection Zones (SPZs)

¹⁴ Department for Transport (2017) TAG unit A3 Environmental Impact Appraisal. Available at: <https://www.gov.uk/government/publications/webtag-tag-unit-a3-environmental-impact-appraisal-december-2015> [Date accessed: 14/11/23]

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

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

¹⁷ Design Manual for Roads and Bridges, Volume 11: Environmental Assessment, Section 3: Environmental Assessment Techniques, Part 1: Air Quality, Annex D2: Road Type. Available at: <http://www.semmms.info/wp-content/uploads/2016/06/Design-Manual-for-Roads-and-Bridges-Volume-11-Section-3-Part-1.-PDF-981Kb.pdf> [Date accessed: 14/11/23]

indicate the risk to groundwater supplies from potentially polluting activities and accidental releases of pollutants. As such, any proposal that is located within a groundwater SPZ could potentially have an adverse impact on groundwater sources¹⁸.

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

D.6.3 Waste

- D.6.3.1 Waste management is jointly coordinated by the Staffordshire Joint Waste Management Board (JWMB) which incorporates Staffordshire County Council, Stoke-on-Trent City Council and the eight districts and boroughs within Staffordshire, including SSDC. SSDC has responsibility for the provision of collection and recycling services for households as part of the management of waste in the county. Less than 3% of Staffordshire’s municipal waste is sent to landfill sites²¹ and Staffordshire Waste Partnership is striving towards a Zero Waste economy²².
- D.6.3.2 The role of the Local Plan in waste management can be to set guidance or requirements for the reduction of construction waste in new development and to ensure design guidance requires new development to accommodate suitable spaces for recycling and waste storage and collection.
- D.6.3.3 One potential method to estimate household waste production would be based on per capita calculations, using the UK local authority statistics which is published by the Government annually²³, based on the average number of people per dwelling and the proposed number of dwellings for new development sites. However, at this stage in SSDC’s plan-making process the housing capacity of sites is uncertain. While site

¹⁸ Environment Agency (2019) Groundwater source protection zones (SPZs). Available at:

<https://www.gov.uk/guidance/groundwater-source-protection-zones-spzs> [Date accessed: 14/11/23]

¹⁹ World Health Organisation (1996) Water Quality Monitoring - A Practical Guide to the Design and Implementation of Freshwater Quality Studies and Monitoring Programmes: Chapter 2 – Water Quality. Available at:

<https://www.taylorfrancis.com/books/mono/10.1201/9781003062110/water-quality-monitoring-jamie-bartram-richard-ballance> [Date accessed: 14/11/23]

²⁰ Department for Environment Food and Rural Affairs (2019) Advice and Information for planning approval on land which is of nature conservation value. Available at: <https://www.daera-ni.gov.uk/articles/advice-and-information-planning-approval-land-which-nature-conservation-value> [Date accessed: 14/11/23]

²¹ Staffordshire County Council (no date) Waste explained. Available at: <https://www.staffordshire.gov.uk/Waste-and-recycling/Waste-explained.aspx> [Date accessed: 14/11/23]

²² Staffordshire Waste Partnership (2013) Refresh of the Joint Municipal Waste Strategy for Staffordshire & Stoke-on-Trent (2007 – 2020). <https://www.staffordshire.gov.uk/Waste-and-recycling/wastestrategy/JointMunicipalWasteManagementStrategy.aspx> [Date accessed: 14/11/23]

²³ Department for Environment Food and Rural Affairs (2023) Statistics on waste managed by local authorities in England in 2021/22. Available at: <https://www.gov.uk/government/statistics/local-authority-collected-waste-management-annual-results-202122#full-publication-update-history> [Date accessed: 14/11/23]

boundaries and site areas are known, as yet unknown on-site constraints may substantially affect housing capacity. The household waste produced as a consequence of the allocation of sites is recorded as uncertain at this stage.

- D.6.3.4 Sites proposed for employment or non-residential end use may present further negative effects on waste production; however, this would be dependent on the site-specific proposals and the nature of development, which is unknown at the time of assessment.
- D.6.3.5 It is assumed that new residents in South Staffordshire will have an annual waste production of approximately 409kg per person, in line with the England average²⁴. South Staffordshire reported a total of 44,355 tonnes of household waste collected in 2021–2022²⁵.

²⁴ DEFRA (2023) Statistics on waste managed by local authorities in England in 2021/22. Available at: <https://www.gov.uk/government/statistics/local-authority-collected-waste-management-annual-results-202122/local-authority-collected-waste-management-annual-results-202122#:~:text=England%20Waste%20from%20Households%3A%202021%20and%202021%2F22&text=In%202021%2C%20total%20%27waste%20from,increase%20of%202.4%20per%20cent> [Date accessed: 07/12/23]

²⁵ DEFRA (2023) Local authority collected waste: annual results tables 2021/22. Available at: <https://www.gov.uk/government/statistical-data-sets/env18-local-authority-collected-waste-annual-results-tables-202122> [Date accessed: 14/11/23]

Box D.6.1: SA Objective 5: Pollution and Waste assessment methodology	
Air pollution	Score
Development proposals located wholly or partly within 200m of an AQMA, a main road or a railway line are assumed to have a minor negative impact on local residents' exposure to air pollution, noise, and/or vibrations.	-
Development proposals located over 200m of an AQMA, a main road or a railway line are assumed to have a negligible impact on local residents' exposure to air pollution, noise, and/or vibrations.	0
Water pollution	Score
Development proposals located within the total catchment (Zone III), outer zone (Zone II) or inner zone (Zone I) of a groundwater SPZ would be likely to have a minor negative impact on groundwater sources.	-
Development proposals located within 200m of a watercourse are assumed to have a minor negative impact on local water quality.	-
Development proposals located outside of groundwater SPZs and over 200m from watercourses would be expected to have a negligible impact on water pollution.	0
Waste	Score
At this stage of assessment, the residential capacity at each residential-led development proposal is unknown. As such, it is uncertain the extent to which each development proposal could potentially result in an increase household waste generation in the Plan area.	+/-

D.7 SA Objective 6 – Natural Resources

D.7.1 Previously Developed Land

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

D.7.2 Agricultural Land Class

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

D.7.3 Water resource

- D.7.3.1 It is assumed that proposals will be in accordance with the national mandatory water efficiency standard of 125 litres per person per day, as set out in the Building Regulations 2010²⁸.

²⁶ Department for Levelling Up, Housing and Communities (2023) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework-2> [Date accessed: 14/11/23]

²⁷ MAFF. October 1988. Available at Natural England.

<http://publications.naturalengland.org.uk/publication/6257050620264448?category=5954148537204736> [Date accessed: 14/11/23]

²⁸ The Building Regulations 2010. Available at: <http://www.legislation.gov.uk/uksi/2010/2214/contents/made> [Date accessed: 16/11/23]

D.7.3.2 It is assumed that all residential-led development proposals in the LPR will be subject to appropriate approvals and licensing for sustainable water supply from the Environment Agency.

Box D.7.1: SA Objective 6: Natural Resources assessment methodology	
Previously developed land	Score
As the proposed development at each site is currently unknown, it is uncertain the quantity of soil resource which would be lost. As such, the proposed development on all greenfield sites would be expected to have a minor negative impact on local soil resources.	-
Development of an existing brownfield site would be expected to contribute positively to safeguarding greenfield land in South Staffordshire and have a minor positive impact for this objective.	+
Agricultural Land Classification (ALC)	Score
Development proposals which are situated on Grade 1, 2 or 3 ALC land, and would therefore risk the loss of some of the Plan area's BMV land, would be expected to have a minor negative impact for this objective.	-
Development proposals which are situated on Grade 4 and 5 ALC land, or land classified as 'urban' or 'non-agricultural' and would therefore help prevent the loss of the Plan areas BMV land, would be expected to have a minor positive impact for this objective.	+

D.8 SA Objective 7 – Housing

D.8.1 Housing

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

Box D.8.1: SA Objective 7: Housing assessment methodology	
Housing provision	Score
The potential capacity at each residential-led development proposal is unknown at this stage of assessment. However, sites identified as strategic sites, with a potential housing capacity of over 500 dwellings would be expected to result in a substantial increase in housing provision across the Plan area. A major positive impact in regard to housing provision would be expected.	++
The potential capacity at other residential-led development proposal is unknown at this stage of assessment. However, all sites would be expected to result in an increase in housing provision across the Plan area, to some extent. A minor positive impact in regard to housing provision has therefore been identified for each residential-led development proposal.	+
As all employment-led development proposals would not be anticipated to alter the total housing provision across the Plan area, a negligible impact would be expected.	0
Some of the Gypsy and Traveller-led development proposals are currently in use, either as authorised or unauthorised sites. As the potential capacity of each Gypsy and Traveller-led development proposal is unknown at this stage of assessment, the likely impact on accommodation provision across the Plan area is uncertain.	+/-

D.9 SA Objective 8 – Health and Wellbeing

D.9.1 Air quality

D.9.1.1 It is assumed that development proposals located in close proximity to main roads would expose site end users to transport associated noise and air pollution. In line with the DMRB guidance, it is assumed that receptors would be most vulnerable to these impacts located within 200m of a main road²⁹. Negative impacts on the long-term health of residents are anticipated where residents will be exposed to air pollution.

D.9.1.2 AQMAs are considered to be an area where the national air quality objective will not be met. Site end users exposed to poor air quality associated with AQMAs would be expected to have adverse impacts on health and wellbeing.

D.9.2 Health facilities

D.9.2.1 In order to facilitate healthy and active lifestyles for existing and new residents, it is expected that SSDC should seek to ensure that residents have access to NHS hospitals, GP surgeries and leisure centres. Sustainable distances to each of these necessary services are derived from Barton *et al.*³⁰.

D.9.2.2 For the purposes of this assessment, accessibility to a hospital has been taken as proximity to an NHS hospital with an A&E service. Distances of proposals to other NHS facilities (e.g. community hospitals and treatment centres) or private hospitals has not been taken into consideration in this assessment.

D.9.2.3 There are no NHS hospitals with an A&E department located within South Staffordshire. The closest NHS hospitals with an A&E department include New Cross Hospital, Russell's Hall Hospital, County Hospital and Walsall Manor Hospital. There are numerous GP surgeries located across the Plan area. Access to leisure centres can provide local residents with opportunities to facilitate healthy lifestyles through exercise.

D.9.3 Leisure centres

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

²⁹ Design Manual for Roads and Bridges, Volume 11: Environmental Assessment, Section 3: Environmental Assessment Techniques, Part 1: Air Quality, Annex D2: Road Type. Available at <http://www.semmms.info/wp-content/uploads/2016/06/Design-Manual-for-Roads-and-Bridges-Volume-11-Section-3-Part-1.-PDF-981Kb.pdf> [Date accessed: 17/11/23]

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

D.9.4 Green network

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

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

Box D.9.1: SA Objective 8: Health and Wellbeing assessment methodology	
Air quality	Score
Development proposals located wholly or partly within 200m of a main road or an AQMA are assumed to have a minor negative impact on local residents’ exposure to air pollution.	-
Development proposals located wholly over 200m from a main road or an AQMA are assumed to have a minor positive impact on local residents’ exposure to air pollution.	+
Health facilities	Score
Development proposals located wholly or partly over 5km from one of the hospitals stated above, 800m of a GP surgery or 1.5km of a leisure centre would be likely to have a minor negative impact on site end users’ access to health services.	-
Development proposals located wholly within 5km of one of the hospitals stated above, 800m of a GP surgery or 1.5km of a leisure centre are assumed to have a minor positive impact on site end users’ access to health services.	+
Leisure facilities	Score
Development proposals located wholly or partially over 1.5km from a public leisure centre would be likely to have a minor negative impact on end users access to these services.	-
Development proposals located wholly within 1.5km from a public leisure centre would be likely to have a minor positive impact on end users access to these services.	+
Green network	Score
Development proposals located over 600m from a PRoW/ cycle path or a public greenspace could potentially have a minor negative impact on residents’ access to natural habitats and therefore, have an adverse impact on the physical and mental health of local residents.	-
Proposals that are wholly located within 600m of a PRoW/ cycle path or a public greenspace are assumed to have a minor positive impact on residents’ access to a diverse range of natural habitats.	+
Where a development proposal coincides with a public greenspace, it is assumed that the greenspace would be lost to some extent, and as such, a minor negative impact on the green network would be expected.	-

D.10 SA Objective 9 – Cultural Heritage

D.10.1 Cultural heritage

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

³² Historic England Heritage at Risk Register. Available at: <https://historicengland.org.uk/advice/heritage-at-risk/search-register> [Date accessed: 16/11/23]

Box D.10.1: SA Objective 9: Cultural Heritage assessment methodology	
Heritage assets	Score
Where a Grade I, Grade II* or Grade II Listed Building, SM or RPG coincides with a development proposal, it is assumed that the setting of these features will be permanently altered, and a major negative impact is expected. Where a development proposal is located adjacent to a Grade I Listed Building it is assumed that the proposal would also permanently alter the setting to the asset and a major negative impact on the historic environment is expected.	--
Where development proposals are located adjacent to, or in close proximity to, a Grade II* or Grade II Listed Building, a SM, or an RPG; located in close proximity to a Grade I Listed Building; or coincide with or are adjacent to an archaeological feature, it is assumed there will be an adverse impact on the setting of the asset, to some extent, and a minor negative impact is expected. Potential impacts on Conservation Areas and their setting are recorded as minor negative impacts.	-
Where development proposals are not located in close proximity to any heritage asset, or the nature of development is determined not to affect the setting or character of the nearby heritage asset, a negligible impact is expected for this objective.	0
Historic Environment Character	Score
Where development proposals are located within areas of 'high' or 'medium' historic value, a minor negative impact on historic character would be expected.	-
Where development proposals are located within areas of 'low' historic value, a negligible impact on historic character would be expected.	0

D.11 SA Objective 10 – Transport and Accessibility

D.11.1 Public transport

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

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

D.11.2 Pedestrian access

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

D.11.3 Road access

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

³³ Google Maps (2023) Available at: <https://www.google.co.uk/maps>

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

Box D.11.1: SA Objective 10: Transport and Accessibility assessment methodology	
Public transport	Score
Development proposals located partially or wholly outside of the target distance of 2km for a railway station or 400m for a bus stop are assumed to have a minor negative impact on transport and accessibility.	-
Development proposals located wholly within the target distance to a railway station or bus stop are assumed to have a minor positive impact on local transport and accessibility.	+
Pedestrian access	Score
Development proposals which would not be anticipated to provide adequate access would be expected to result in a minor negative impact on pedestrian access. These negative impacts are considered to be occasional and reversible.	-
Development proposals which would be expected to provide site end users with adequate access to the surrounding footpath network would be expected to have a minor positive impact on pedestrian access.	+
Road access	Score
Development proposals which would not be anticipated to provide adequate access would be expected to have a minor negative impact on road access. This negative impact is considered to be occasional and reversible.	-
Development proposals which would be expected to provide site end users with adequate access to the surrounding road network would be expected to have a minor positive impact on road access.	+
Overall	Score
Development proposals which would locate site end users away from all of the above receptors would be expected to have a major negative impact for this objective.	--
Development proposals which would locate site end users in close proximity to all of the above receptors would be expected to have a major positive impact for this objective.	++

D.12 SA Objective 11 – Education

D.12.1 Education

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

Box D.12.1: SA Objective 11: Education assessment methodology	
Access to primary and secondary schools	Score
Residential-led development proposals which would locate new residential sites partially or wholly outside of the target distance to both a primary and secondary school would be likely to have a major negative impact on the education objective.	--
Residential-led development sites located partially or wholly outside of the target distances for a primary or secondary school would be expected to have a minor negative impact for this objective.	-
Development proposals which are for employment end use have been assessed as negligible under the education objective.	0
Residential-led development sites located wholly within the target distances of a primary school or secondary school would be expected to have a minor positive impact for this objective.	+
Residential-led development sites located wholly within the target distances to both a primary and secondary school would be expected to have a major positive impact on the education objective.	++

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

D.13 SA Objective 12 – Economy and Employment

D.13.1 Employment opportunities

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

D.13.2 Employment floorspace

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

³⁶ DLP Planning Ltd (2022) Economic Development Needs Assessment 2020-2040 for and on behalf of South Staffordshire District Council, June 2022. Available at https://www.sstaffs.gov.uk/sites/default/files/2023-03/edna_2020-2040_final.pdf [Date accessed: 14/11/23]

³⁷ South Staffordshire Council (2018) Rural Services and Facilities Audit. Available at: https://www.sstaffs.gov.uk/sites/default/files/2023-03/rural_services_and_facilities_audit_2021.pdf [Date accessed: 14/11/23]

³⁸ Google Maps (2023) Available at: <https://www.google.co.uk/maps>

Box D.13.1: SA Objective 12: Economy and Employment assessment methodology	
Employment opportunities	Score
Residential-led development proposals located in areas not assessed in the Rural Services and Facilities Audit are assumed have poor access to employment opportunities and therefore, a major negative impact would be expected.	--
Residential-led development proposals that would place site end users in locations with unreasonable or poor access to employment opportunities (the lower half Hansen scores, or adjacent to a village/urban area with Hansen score coverage to some extent) would have a minor negative impact on access to employment opportunities.	-
Residential-led development proposals that would place site end users in locations with good or reasonable access to employment opportunities (the upper half Hansen scores) would have a minor positive impact on access to employment opportunities.	+
Employment floorspace	Score
Development proposals which result in a net decrease in employment floorspace would be expected to have a major negative impact on the local economy.	--
Development proposals which result in a net increase in employment floorspace would be expected to have a major positive impact on the local economy.	++

Appendix E: Assessment of Additional Residential Growth Options

Appendix E Contents

E.1	Introduction.....	E1
E.2	Assessment of Residential Growth Options	E2
E.3	Conclusions	E9

Tables

Table E.1.1:	Options for residential growth considered within the Issues and Options SA Report (2018)	E2
Table E.1.2:	Option F for residential growth considered within Regulation 19 SA Report (2022).....	E4
Table E.3.1:	Summary SA findings for assessment of Residential Growth Options A-H	E10

Boxes

Box E.1:	Information regarding SSDC's identification of Residential Growth Options G and H.....	E4
-----------------	--	----

E.1 Introduction

E.1.1 Overview

- E.1.1.1 The purpose of this appendix is to provide an assessment of residential growth options identified by South Staffordshire District Council (SSDC), including two new options identified since the Regulation 19 (2022) stage.
- E.1.1.2 The evaluation of additional options has been carried out in a consistent manner drawing on the assessment of options from previous SA stages.
- E.1.1.3 Limitations of the assessments are declared where relevant.

E.2 Assessment of Residential Growth Options

E.2.1 Overview

- E.2.1.1 The Issues and Options SA Report (2018)¹ included an appraisal of each option identified in SSDC’s Issues and Options Paper, in order to help the Council to identify the most sustainable options for the LPR.
- E.2.1.2 This included options for the quantity of residential, employment and Gypsy and Traveller development that should be delivered through the LPR as well as various spatial strategy options which would help to deliver the development.
- E.2.1.3 Five options for the quantity of residential growth were assessed within the Issues and Options SA, which are reproduced in **Table E.1.1**.

Table E.2.1: Options for residential growth considered within the Issues and Options SA Report (2018)

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

¹Lepus 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: 21/12/23]

Option	Description	Commentary
	<ul style="list-style-type: none"> • A minimum requirement of 9,130 dwellings between 2018-2037 • A minimum average yearly requirement of 481 dwellings throughout the plan period 	(30%) annual increase above the single highest yearly level of housing completions achieved in the district in the last 22 years.
D	<p>Provide enough housing to meet South Staffordshire’s objectively assessed housing needs, and provide enough land to accommodate an additional 12,000 dwellings towards wider housing shortfalls from the HMA (having regard to the mid-point capacity implied by the Green Belt and Open Countryside strategic areas of search set out in the HMA Strategic Growth Study). This would equate to:</p> <ul style="list-style-type: none"> • A minimum requirement of 17,130 dwellings between 2018-2037 • A minimum average yearly requirement of 902 dwellings throughout the plan period 	This would ensure South Staffordshire provided a large contribution towards unmet needs of the HMA, based upon the levels of growth implied by the strategic areas of search for South Staffordshire within the HMA Strategic Growth Study. This quantum of dwellings represents a very significant (144%) annual increase above the single highest yearly level of housing completions achieved in the district in the last 22 years.
E	<p>Provide enough housing to meet South Staffordshire’s objectively assessed housing needs, and enough land to accommodate an additional 20,000 dwellings towards wider housing shortfalls from the HMA (having regard to the upper capacity implied by the Green Belt and Open Countryside strategic areas of search set out in the HMA Strategic Growth Study). This would equate to:</p> <ul style="list-style-type: none"> • A minimum requirement of 25,130 dwellings between 2018-2037 • A minimum average yearly requirement of 1,323 dwellings throughout the plan period 	Under this option South Staffordshire would provide around a third of the current HMA-wide housing shortfall set out in the HMA Strategic Growth Study, before any recommendations to increase supply and densities within the existing urban areas have been fully examined by other HMA authorities. This quantum of dwellings represents a very significant (257%) annual increase above the single highest yearly level of housing completions achieved in the district in the last 22 years.

E.2.1.4 Following the Issues and Options stage, and having considered the representations which were submitted as part of the consultation process, SSDC identified a further reasonable alternative to the level of residential growth (see **Table E.1.2**). The Council received a number of representations from the development industry requesting that an option be tested for a level of housing growth between Options C and D. One representation, from Lichfields, included evidence seeking to justify a contribution to the Greater Birmingham HMA, based on commuting and migration flows. The evidence showed that a share of Birmingham and the Black Country’s existing and emerging housing shortfalls should be attributed to South Staffordshire based on the strength of flows between South Staffordshire and the shortfall generating areas. This suggested that South Staffordshire should consider an option which provided for the district’s own needs, plus 8,650 dwellings towards the unmet needs of the HMA. Consequently, the Council produced a new option, Residential Growth Option F (see **Table E.1.2**).

E.2.1.5 Option F has been assessed through the SA process and was presented in the 2022 Regulation 19 SA Report².

² Lepus Consulting (2022) Sustainability Appraisal of the South Staffordshire Local Plan Review: Regulation 19, October 2022. Available at: https://www.sstaffs.gov.uk/sites/default/files/2023-02/02_sa_volume_2_october_2022.pdf [Date accessed: 15/12/23]

Table E.2.2: Option F for residential growth considered within Regulation 19 SA Report (2022)

Option	Description	Commentary
F	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"> • A minimum requirement of 13,739 dwellings between 2018-2039 • A minimum average yearly requirement of 654 dwellings throughout the plan period 	Under this option South Staffordshire would provide a significant contribution to the unmet needs of the HMA-wide housing shortfall, based primarily on the relative strength of existing migration and commuting flows between South Staffordshire and HMA authorities generating housing shortfalls (the Black Country authorities and Birmingham). This quantum of dwellings represents a very significant (77%) annual increase above the single highest yearly level of housing completions achieved in the district in the 22 year period covered by its last two previous plan periods (1996-2018).

E.2.1.6 Since the publication of the 2022 Regulation 19 SA Report, the Council has identified two further reasonable alternative residential growth options. The justification for additional options as declared by the Council is presented in **Box E.1**.

Box E.1: Information regarding SSSDC’s identification of Residential Growth Options G and H

“Following publication of the Council’s November 2022 Publication Plan (Regulation 19) consultation and following proposed changes to the NPPF published in December 2022, progress on the previous iteration of the plan was paused. This reflected proposed changes to Green Belt policy which came into force through the December 2023 NPPF. This confirmed that there is no requirement for Green Belt boundaries to be reviewed or changed when Local Plans are being prepared and that it is within authorities’ gift to choose to review Green Belt boundaries through the Local Plan where they feel that exceptional circumstances for doing so exist and these can be fully evidenced and justified.

Following the pause to plan preparation it was no longer possible to submit the previous 2022 version of the plan as that plan’s end date (2039) would be inconsistent with national policy requiring Local Plans to cover 15 years post adoption, and the evidence that the previous strategy was based upon (specifically the 2018 Strategic Growth Study) is now considered out of date. Given this change in circumstances and the clarification to national Green Belt policy, it was considered necessary to explore further spatial strategy options, and thereby levels of growth, to reflect the updated NPPF position on Green Belt release.

The first level of growth for testing (Option G), equates to a minimum requirement of 4726 dwellings between 2023 and 2041 and was based upon a capacity led approach. Essentially, this reflects the capacity of suitable non Green Belt site options - predominantly on safeguarded land and suitable open countryside sites beyond the Green Belt - as well the capacity of a reduced number of suitable Green Belt allocations, with Green Belt release now focused on the most sustainable sites at the Council’s Tier 1 settlements which are within walking distance (2km) of a train station.

The second level of growth for testing (Option H) equates to a minimum of 4086 dwellings per annum and is based upon the Council’s Objectively Assessed Need between 2023-2041, derived from the Government’s standard method formula. This is the equivalent of a minimum of 227 dwellings per annum and would align with the NPPF requirement to address objectively assessed needs over the plan period. Whilst this option provides for the lowest level of housing growth of the option tested and no contribution to wider housing shortfalls (albeit still meeting South Staffordshire’s own needs), it is considered important to understand how the option performs in SA terms to inform plan-making as lower levels of growth tend to be beneficial for climate change and other environmental objectives.”

E.2.1.7 Options G and H for residential growth have been evaluated following the same methodology used to assess Options A-E within the Issues and Options SA (2018) and Option F within the Regulation 19 SA (2022).

E.2.2 Assessment of Residential Growth Option G

Option G for residential growth

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:

- **A minimum requirement of 4,726 dwellings between 2023-2041**
- **Average yearly minimum requirement of 263 dwellings throughout the plan period.**

	1	2	3	4	5	6	7	8	9	10	11	12
Residential 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 G	--	+/-	+/-	+/-	--	+/-	++	+/-	+/-	+/-	+/-	+/-

E.2.2.1 Residential Growth Option G would deliver more than enough houses to satisfy the latest Objectively Assessed Need (OAN) of 4,086 dwellings in South Staffordshire over the Plan period 2023-2041. This option would also contribute towards meeting the OAN for other authorities in the Housing Market Area (HMA) by accommodating 640 additional dwellings. Consequently, Option G would be likely to result in a major positive impact on SA Objective 7.

E.2.2.2 Similarly to the assessment of options as presented in the Issues and Options SA Report, assessing the impacts of Option G on SA Objectives other than housing is rendered difficult by the uncertainty over the distribution of development. However, it is likely that the quantity of development proposed would make it difficult for SSDC to avoid adverse sustainability impacts, although adverse impacts would be likely to be lesser than those for the other options seeking a higher quantum of growth.

E.2.2.3 Based on an average of 2.3 people per dwelling in South Staffordshire³, the delivery of 4,726 new dwellings through Option G could be expected to increase the local population by approximately 10,870 people. The extent to which this may result in over-capacity issues at key services such as GP surgeries and schools is uncertain, and would be

³ 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: 15/12/23]

dependent on the capacity of the services, distribution of development and site-specific details.

- E.2.2.4 In 2021, South Staffordshire’s carbon emissions totalled approximately 816,936 tonnes CO₂, whilst residents of the district had an average annual carbon footprint of 7.4 tonnes CO₂ per person⁴. This represents a decrease compared to the available data for the assessments carried out for residential growth Options A-E within the Issues and Options SA (2018), and Option F within the Regulation 19 SA (2022) indicating a general trend of reduced carbon emissions over time which would be likely to continue over the Plan period to 2041. Nonetheless, the development of 4,726 dwellings under Option G would be expected to significantly increase the local area’s contribution towards the causes of climate change in the short-medium term (SA Objective 1).
- E.2.2.5 In 2021-2022, South Staffordshire’s collected household waste totalled 47,388 tonnes⁵ which presents a slight increase compared to previous years. The average waste production per person per year in England was 377kg in 2022, reduced from 409kg in 2021⁶. Assuming new residents would generate 377kg waste per capita, the introduction of 10,870 new residents through Option G could potentially increase the total household waste generation by approximately 4,098 tonnes. This could result in a major negative impact on SA Objective 5.
- E.2.2.6 Impacts on SA Objectives 2, 3, 4, 6, 8, 9, 10, 11 and 12 are uncertain, as these impacts are largely dependent on the distribution of development. By pursuing a quantity of development that exceeds the local OAN, there will potentially be less scope for avoiding adverse sustainability impacts than Option H particularly in terms of environmental constraints, although Option G represents a smaller quantum of growth than Options A-F, and so these effects will likely be lesser.

⁴ DBEIS (2023) UK local authority and regional greenhouse gas emissions national statistics, 2005 to 2021. Available at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-greenhouse-gas-emissions-national-statistics-2005-to-2021> [Date accessed: 07/03/24]

⁵ DEFRA (2024) Local authority collected waste generation from 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]

⁶ DEFRA (2024) Local authority collected waste management - annual results 2022/23. Available at: <https://www.gov.uk/government/statistics/local-authority-collected-waste-management-annual-results/local-authority-collected-waste-management-annual-results-202223#:~:text=In%202022%2F23%2C%20total%20local,per%20cent%20from%202021%2F22> [Date accessed: 12/03/24]

E.2.3 Assessment of Residential Growth Option H

Option H for residential growth

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

- **A minimum requirement of 4,086 dwellings between 2023-2041**
- **Average yearly minimum requirement of 227 dwellings throughout the plan period.**

	1	2	3	4	5	6	7	8	9	10	11	12
Residential 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 H	--	+/-	+/-	+/-	--	+/-	+	+/-	+/-	+/-	+/-	+/-

E.2.3.1 Residential Growth Option H would deliver enough houses to satisfy the latest calculated OAN of 4,086 dwellings in South Staffordshire over the Plan period 2023-2041. Consequently, Option H is identified to result in a minor positive impact on SA Objective 7. This option would however make no contribution towards meeting the OAN for other authorities in the HMA, and would not seek to address the housing shortfall in the HMA as a whole.

E.2.3.2 Option H would be likely to perform similarly to Option A, given that Option A sought to meet the OAN at the time of its identification in 2018, and Option H does the same but for the most recent calculation for 2024, resulting in a lower overall quantum of development compared to Options A-G.

E.2.3.3 Based on an average of 2.3 people per dwelling in South Staffordshire⁷, the delivery of 4,086 new dwellings through Option H could be expected to increase the local population by approximately 9,398 people. The extent to which this may result in over-capacity issues at key services such as GP surgeries and schools is uncertain, and would be dependent on the capacity of the services, distribution of development and site-specific details.

E.2.3.4 In 2021, South Staffordshire’s carbon emissions totalled approximately 816,936 tonnes CO₂, whilst residents of the district had an average annual carbon footprint of 7.4 tonnes CO₂ per person⁸. This represents a decrease compared to the available data for the

⁷ Based on 2021 Census population data (110,500) and 2021 dwelling stock information (48,064).

ONS (2022) Population and household estimates, England and Wales: Census 2021. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/populationandhouseholdestimatesenglandandwales/census2021> and DLUHC & MHCLG (2022) Live tables on dwelling stock. Available at: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants> [Date accessed: 15/12/23]

⁸ DBEIS (2023) UK local authority and regional greenhouse gas emissions national statistics, 2005 to 2021. Available at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-greenhouse-gas-emissions-national-statistics-2005-to-2021> [Date accessed: 07/03/24]

assessments carried out for residential growth Options A-E within the Issues and Options SA (2018), and Option F within the Regulation 19 SA (2022) indicating a general trend of reduced carbon emissions over time which would be likely to continue over the Plan period to 2041. Nonetheless, the development of 4,086 dwellings under Option H would be expected to significantly increase the local area's contribution towards the causes of climate change in the short-medium term, albeit to a lesser extent than the other seven options given it proposes the lowest quantum of growth (SA Objective 1).

E.2.3.5 In 2021-2022, South Staffordshire's collected household waste totalled 47,388 tonnes⁹ which presents a slight increase compared to previous years. The average waste production per person per year in England was 377kg in 2022, reduced from 409kg in 2021¹⁰. Assuming new residents would generate 377kg waste per capita, the introduction of 9,398 new residents through Option H could potentially increase the total household waste generation by approximately 3,543 tonnes. This could result in a major negative impact on SA Objective 5.

E.2.3.6 Impacts on SA Objectives 2, 3, 4, 6, 8, 9, 10, 11 and 12 are uncertain, as these impacts are largely dependent on the distribution of development. Option H represents the smallest quantum of growth of the eight options, seeking to meet but not exceed the latest calculated OAN for the Plan period 2023-2041. As such, this option could potentially result in the most scope for avoiding adverse impacts on biodiversity, landscape, soils, water, air quality and cultural heritage and put the least pressure on infrastructure such as transport and health. Conversely, pursuing a lower housing number could lead to further challenges in terms of delivering a suitable mix of housing and new infrastructure to meet the needs of the local population.

⁹ DEFRA (2024) Local authority collected waste generation from 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]

¹⁰ DEFRA (2024) Local authority collected waste management - annual results 2022/23. Available at: <https://www.gov.uk/government/statistics/local-authority-collected-waste-management-annual-results/local-authority-collected-waste-management-annual-results-202223#:~:text=In%202022%2F23%2C%20total%20local,per%20cent%20from%202021%2F22> [Date accessed: 12/03/24]

E.3 Conclusions

E.3.1 Likely impacts of not satisfying the OAN

- E.3.1.1 Eight options for residential growth have been assessed in the SA process. Each of these options either meets or exceeds the OAN for residential growth in South Staffordshire for the Plan period.
- E.3.1.2 In general, it is easier to avoid adverse impacts on natural environment SA Objectives such as landscape, biodiversity, climate change adaptation and natural resources when there is less development. An option for development that does not support the local OAN may therefore be a relatively sustainable option in this regard.
- E.3.1.3 However, a growth option that does not satisfy the local development needs would be likely to result in significant adverse impacts on social and economic SA Objectives such as housing and the economy.
- E.3.1.4 The wider HMA has a major shortfall in housing, with the Strategic Growth Study (2018)¹¹ identifying an outstanding shortfall of 60,900 dwellings to 2036, when factoring in the need and current identified supply. Subsequent Local Plan consultations from Birmingham City Council and the Black Country authorities suggest that housing shortfalls are increasing. The Council are therefore committed to assessing the potential impacts of taking on some of this unmet need, which could be an appropriate strategy for the predominantly urban HMA, given the relatively open nature of the district.
- E.3.1.5 Paragraph 35 of the NPPF (2023)¹² states: "*Plans are 'sound' if they are: a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.*"
- E.3.1.6 For the purpose of 'reasonable alternatives', a growth option that does not satisfy the OAN of South Staffordshire, as a *minimum*, would not allow for a 'sound' plan and in that sense would not be considered reasonable.

E.3.2 Limitations of assessment

- E.3.2.1 Environmental assessment, as per the methodology, needs to have details of size, nature and location in order for impacts to be understood in relation to the environmental baseline. The housing numbers have only 'nature', in this case housing. The size and

¹¹ Wood (2018) Greater Birmingham HMA Strategic Growth Study: Greater Birmingham & the Black Country, February 2018. Available at:
https://www.birmingham.gov.uk/downloads/file/9407/greater_birmingham_hma_strategic_growth_study [Date accessed: 21/12/23]

¹² DLUHC (2023) National Planning Policy Framework, December 2023. Available at:
https://assets.publishing.service.gov.uk/media/65829e99fc07f3000d8d4529/NPPF_December_2023.pdf [Date accessed: 21/12/23]

location details are not present which means that any attempt to evaluate impacts in a meaningful way is necessarily very high level. The housing number descriptions lack spatial prescription beyond the principles promoted by the NPPF para 123 (2023)¹³ to pursue brownfield first. Whilst size is implied by the total number of houses associated with each option, the distribution by size and location is missing and consequently the SA process is only able to engage at a very high level with restricted diagnostic conclusions.

E.3.2.2 It should be acknowledged that the eight residential growth options (A-H) have been identified and evaluated on an iterative basis at different stages of the LPR and SA process. Options A-E were evaluated during the Regulation 18(I) stage when the Plan period was anticipated to cover 2018 to 2037; Option F was evaluated during the Regulation 19 stage (2022) covering a Plan period of 2018 to 2039; and Options G and H were evaluated at the current Regulation 19 stage (2024) covering a Plan period of 2023 to 2041.

E.3.2.3 The options have been identified to facilitate testing of reasonable alternatives for the total number of new houses to be delivered during the Plan period. The Plan period defined in Options F and G/H has different start and end dates because the Plan has taken longer to complete than originally envisaged; each option has been extended to reflect the revisions to timetable. All options have been evaluated accordingly using the same SA methodology.

E.3.3 SA findings

E.3.3.1 **Table E.3.1** presents a summary of the SA findings for the assessment of Residential Growth Options A-E extracted from the Issues and Options SA Report (2018) and Option F extracted from the Regulation 19 SA (2022), as well as the assessment findings as discussed within this appendix for Options G and H.

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

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	--	+/-	+/-	+/-	--	+/-	+	+/-	+/-	+/-	+/-	+/-

¹³ DLUHC (2023) National Planning Policy Framework, December 2023. Available at: https://assets.publishing.service.gov.uk/media/65829e99fc07f3000d8d4529/NPPF_December_2023.pdf [Date accessed: 21/12/23]

-
- E.3.3.2 As discussed in **section E.3.2**, the high-level assessment of housing growth is limited, resulting in uncertain impacts being identified for various SA Objectives.
- E.3.3.3 Options D, E and F which propose the highest levels of growth (totalling 17,130, 25,130 and 13,739 dwellings respectively) would generally be expected to result in greater potential for adverse effects particularly in relation to environmental SA Objectives such as air quality, climate change, biodiversity, soil resources and landscape. These three options would also be likely to present the greatest challenge with respect to capacity issues and pressure on existing services and infrastructure required to deliver the proposed levels of growth and meet the day to day needs of the population.
- E.3.3.4 Option A would meet South Staffordshire’s OAN (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.
- E.3.3.5 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.

Appendix F: Assessment of Additional Spatial Options

Appendix F Contents

F.1	Introduction.....	F1
F.2	Spatial Option A – Maximise available Open Countryside release.....	F3
F.3	Spatial Option B – Prioritising Green Belt land release in areas of lesser Green Belt harm	F7
F.4	Spatial Option C – Carry forward existing Core Strategy strategic approach to distribution	F11
F.5	Spatial Option D – Maximising sites in areas identified in the GBHMA Strategic Growth Study	F14
F.6	Spatial Option E – Addressing local affordability issues and settlements with the greatest needs.....	F16
F.7	Spatial Option F – Giving first consideration to Green Belt land which is previously developed or well-served by public transport.....	F23
F.8	Spatial Option G – Infrastructure-led development with a garden village area of search beyond the plan period.....	F27
F.9	Spatial Option H – Limited Green Belt development only to meet existing critical infrastructure needs.....	F30
F.10	Spatial Option I – Limited contribution towards GBBCHMA needs and limited Green Belt development in Tier 1 settlements	F36
F.11	Conclusions	F45

Tables

Table F.11.1: SA impact matrix of the nine spatial options assessed in this report..... F45

Figures

Figure F.2.1: Spatial Strategy Option A F4
Figure F.3.1: Spatial Strategy Option B F8
Figure F.4.1: Spatial Strategy Option C F12
Figure F.5.1: Spatial Strategy Option D F15
Figure F.6.1: Spatial Strategy Option E..... F20
Figure F.7.1: Spatial Strategy Option F..... F25
Figure F.8.1: Spatial Strategy Option G F28
Figure F.9.1: Spatial Strategy Option H F31
Figure F.10.1: Spatial Strategy Option I F38

F.1 Introduction

F.1.1 Background

F.1.1.1 SSDC prepared a Spatial Housing Strategy and Infrastructure Delivery (SHSID) document in 2019¹ as part of the LPR process. The Regulation 18 (II) SA Report² set out the appraisal of the seven spatial options, known as Options A – G, identified in the SHSID (2019) document. These spatial options constitute reasonable alternatives for the distribution of new housing growth in the Plan area.

F.1.1.2 Since the Regulation 18 (II) stage, SSDC have identified two further reasonable alternatives for the spatial distribution of growth, known as Options H and I, and the initial seven Options A – G have been updated to reflect the proposed change to the Plan period and consequent adjustments to the housing numbers which could feasibly be delivered under each.

F.1.1.3 The two new spatial options known as Options H and I have been identified by SSDC following consideration of the government's proposed changes to the planning system and in particular the approach taken to release of Green Belt land for housing development.

F.1.2 Overview

F.1.2.1 The purpose of this appendix is to provide an appraisal of the nine new / amended reasonable alternative spatial options in terms of their relative sustainability performance using the SA Framework (see **Appendix B**), providing an update to the information presented within the Regulation 18 (II) SA Report. This is intended to help SSDC to identify the most sustainable option and to prepare a Local Plan which delivers sustainable development.

F.1.2.2 The spatial options being considered by the Council in the Spatial Housing Strategy Topic Paper (2024)³, and which are assessed in this appendix, are listed below:

- **Spatial Option A** – Maximise available 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;

¹ South Staffordshire District Council (2019) Spatial Housing Strategy and Infrastructure Delivery.

² 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: 30/11/23]

³ South Staffordshire District Council (2024) The Local Plan Review: Spatial Housing Strategy Topic Paper.

- **Spatial Option E** – Address local affordability issues and settlements with the greatest needs;
- **Spatial Option F** – Give first consideration to Green Belt land which is previously developed or well-served by public transport;
- **Spatial Option G** – Infrastructure-led development with a garden village area of search beyond the plan period;
- **Spatial Option H** – Meet the district’s own housing needs only, through sustainable non-Green Belt development and limited Green Belt development only to meet existing critical infrastructure needs; and
- **Spatial Option I** – Meet 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.

F.1.2.3 It should be noted that this appendix focuses on assessing the nine spatial options in terms of the whole Plan delivery, and considers the allocation of new developments, as well as existing commitments and safeguarded land, using the SA Objectives to inform this assessment.

F.1.2.4 The assessments presented within this appendix have drawn on the previous assessment of Options A – G as set out in the Regulation 18 (II) SA Report⁴. Where the overall assessment findings differ from the previously assessed versions, this has been stated. This appendix is structured to present a summary of the findings for Options A – G, with a full narrative appraisal of the new Options H and I based on the same methodology as that used to evaluate options at the Regulation 18 (II) stage. Please refer to the Regulation 18 (II) Report for the full text narrative of the previously assessed versions of Options A - G.

F.1.2.5 All figures stated within the options are approximate and are based on the most up to date information as provided by SSDC.

⁴ 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: 30/11/23]

F.2 Spatial Option A – Maximise available Open Countryside release

Spatial Option A

This option has been prepared to allow the Council to consider the impacts for sustainable development of seeking to meet its housing needs by channelling growth beyond the Green Belt. It examines the additional capacity that could be met by maximising as much housing supply as possible in Open Countryside locations within the district, regardless of whether this strategy would be deliverable, accord with other national policies or be considered a sustainable pattern of development.

This option would imply significant growth on all potential Open Countryside sites around Wheaton Aston; very large urban extensions north of Penkridge and south of Stafford; and a new garden village around Dunston. In other settlements surrounded by Green Belt, additional land is only released in non-Green Belt locations (i.e. safeguarded land and suitable sites within the development boundary). Even if all of these supply options could be maximised and had no deliverability issues the district would deliver approximately 6,484 dwellings within the plan period, providing a potential contribution to HMA unmet needs of around 2,398 dwellings.

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

F.2.1.1 Under this spatial option, a large proportion of growth (approximately 2,400 dwellings) would be directed towards a new settlement around Dunston and an urban extension south of Stafford. Approximately 2,300 dwellings would be directed towards the Tier 1 settlements (Penkridge, Bilbrook/Codsall and Cheslyn Hay/Great Wyrley), with approximately 1,000 to Tier 2 settlements (mainly Perton, Wombourne and Kinver), approximately 650 to Tier 3 settlements (mainly Wheaton Aston) and a very small proportion to Tier 4 settlements (see **Figure F.2.1**).

Spatial Strategy: Option A

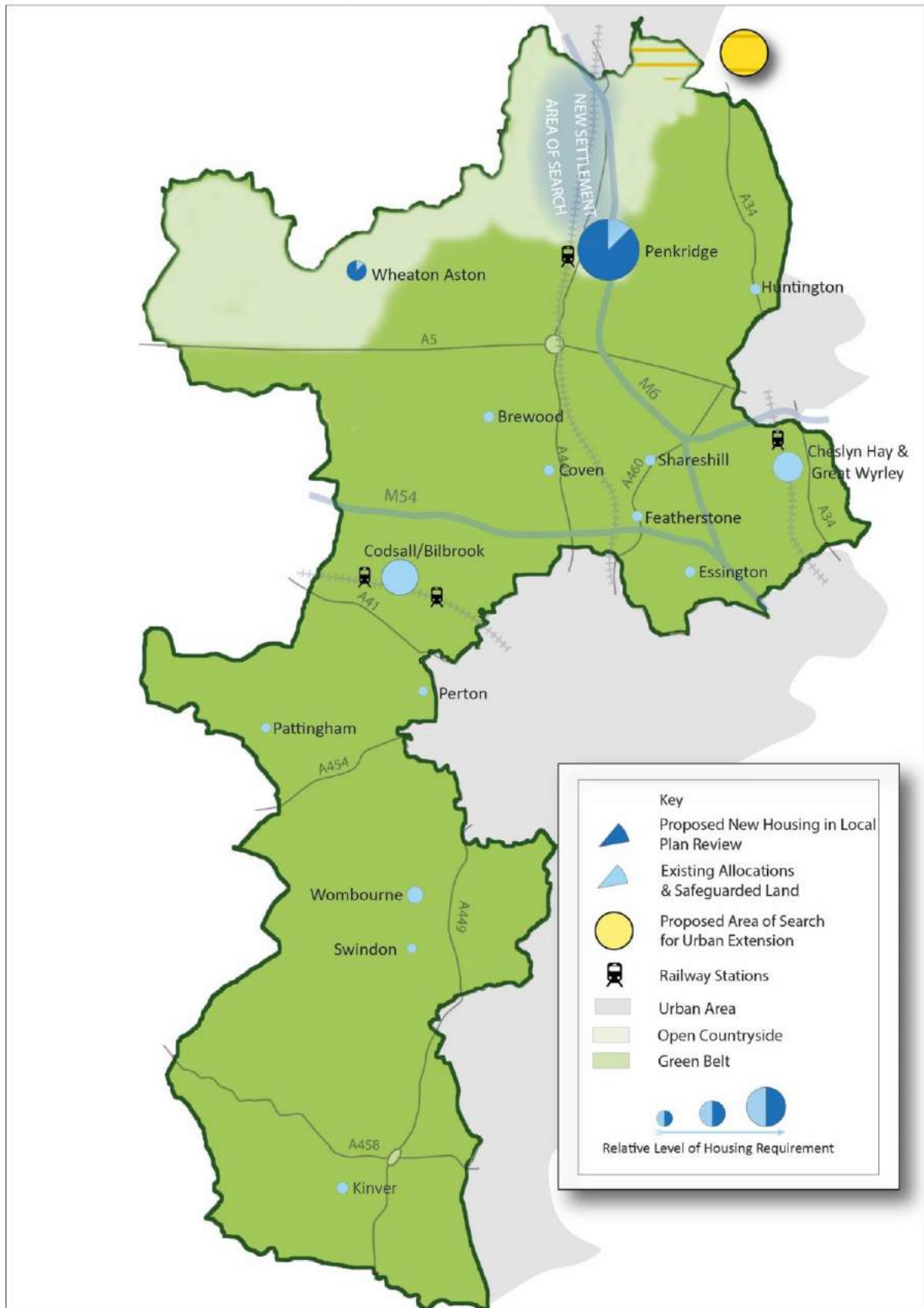


Figure F.2.1: Spatial Strategy Option A

- F.2.1.2 Spatial Option A would deliver approximately 6,484 dwellings across the Plan area, which would meet the identified housing need of 4,086 and contribute approximately 2,398 homes to the wider HMA. As such, a major positive impact on housing provision is identified (SA Objective 7).
- F.2.1.3 The proposed release of Open Countryside for development would be likely to result in the loss of previously undeveloped land and vegetation cover with carbon storage capabilities. The large scale of growth would be expected to result in an increase in carbon emissions, pollution and waste due to the construction and occupation of new development.
- F.2.1.4 Option A includes a new settlement around Dunston, although the specific location is uncertain. There is potential for some new development to be located within or close to Flood Zones 2 and 3 in this area, and to the north east and west of Penkrige / north west and north east of Bilbrook and Codsall. The loss of undeveloped land could potentially result in a loss of vegetation and permeable soils, which help to attenuate flood risk. The proposed development at many of the identified locations under this spatial option would be in close proximity to the river network, potentially increasing the risk of contamination.
- F.2.1.5 Overall, owing to this large scale of development in Open Countryside locations, a major negative impact on climate change mitigation, climate change adaptation and pollution and waste (SA Objectives 1, 2 and 5) and a minor negative impact on natural resources (SA Objective 6) are identified.
- F.2.1.6 The large scale of development proposed would be likely to increase the risk of development related threats and pressures on biodiversity sites including European, national and locally designated sites in proximity to the identified locations, as well as potential cumulative loss of the ecological network through release of Open Countryside land. A minor negative impact on biodiversity is identified (SA Objective 3).
- F.2.1.7 The proposed development in and around Huntington, Penkrige and Dunston may be located adjacent or close to Cannock Chase AONB, with potential to adversely affect the setting of and views from the AONB. Development under this option could result in urban sprawl into the surrounding countryside, and lead to adverse effects on the local landscape character. Overall, a major negative effect on landscape (SA Objective 4) cannot be ruled out. Similarly, development in the Open Countryside could potentially lead to adverse effects on the character and setting of heritage assets located within many of South Staffordshire’s rural settlements, resulting in a minor negative impact on cultural heritage (SA Objective 9).
- F.2.1.8 By focusing development in the Open Countryside including “*very large urban extensions*”, it is likely that a large proportion of growth would be located outside of sustainable travel distances to healthcare facilities and employment opportunities. New residents in Tier 3 and 4 settlements would be expected to have limited access to public transport and would be reliant on private car use. A minor negative impact is identified for health, transport and the economy (SA Objectives 8, 10 and 12). Although the large amount of growth in the north including a new settlement at Dunston could potentially lead to over-capacity issues at schools, the majority of identified growth locations would ensure new residents are located within sustainable distances to schools with potential to achieve a minor positive impact on access to education (SA Objective 11).

- F.2.1.9 The overall assessment findings remain unchanged since this option was evaluated within the Regulation 18 (II) SA, excluding SA Objective 7 (changed from minor to major positive).

F.3 Spatial Option B – Prioritising Green Belt land release in areas of lesser Green Belt harm

Spatial Option B

This option delivers enough housing growth to meet the district’s local housing need and provide around a 4,000 dwelling contribution to the unmet needs of the GBBCHMA. Under this option, approximately 6,059 dwellings would be delivered in the district’s rural villages, whilst around 2,144 dwellings would be delivered in urban extensions to neighbouring urban areas or the wider rural area. Additional housing growth is allocated to broad locations where it could be delivered without the release of any ‘high’ or ‘very high’ harm areas of Green Belt, as identified in the South Staffordshire Green Belt Study 2019. This means that the growth apportioned to each broad location under this option would be accommodated on areas of Green Belt land of ‘moderate – high’ harm or less, or Open Countryside beyond the Green Belt where this is available.

In apportioning growth between the area’s rural settlements, this option also reflects each settlement’s role in the district’s revised settlement hierarchy, giving higher levels of growth to higher tiers of the settlement hierarchy. Therefore, the size of new allocations to individual settlements reflects each settlement’s role in the hierarchy, unless it is clear from the Green Belt Study 2019 that this level of growth would require the release of ‘high’ or ‘very high’ harm areas of Green Belt.

Equally, this option also seeks growth in areas adjacent to neighbouring towns and cities where this can be accommodated without the release of any ‘high’ or ‘very high’ harm areas of Green Belt, recognising the relative sustainability of these areas. The apportionment of growth between different areas of search for urban extensions reflects the extent to which there are opportunities to accommodate growth on less harmful Green Belt sites or areas of Open Countryside beyond the Green Belt. This option also has regard to the relative performance of the Green Belt between the district’s rural settlements and the urban edge of adjacent towns and cities. This means the district’s rural areas share a greater proportion of the planned growth, as they generally contain less areas of ‘high’ or ‘very high’ Green Belt harm.

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

F.3.1.1 Under this spatial option, the majority of growth (approximately 3,000 dwellings) would be directed towards the Tier 1 settlements (Penkridge, Bilbrook/Codsall and Cheslyn Hay/Great Wyrley), with approximately 2,000 to Tier 2 settlements (mainly Wombourne, Perton, Kinver and Brewood), and approximately 1,000 dwellings at Tier 3 and 4 settlements, as well as an urban extension north and west of the Black Country

conurbation (approximately 750 dwellings), and south of Stafford (approximately 1,200 dwellings) (see **Figure F.3.1**).

Spatial Strategy: Option B

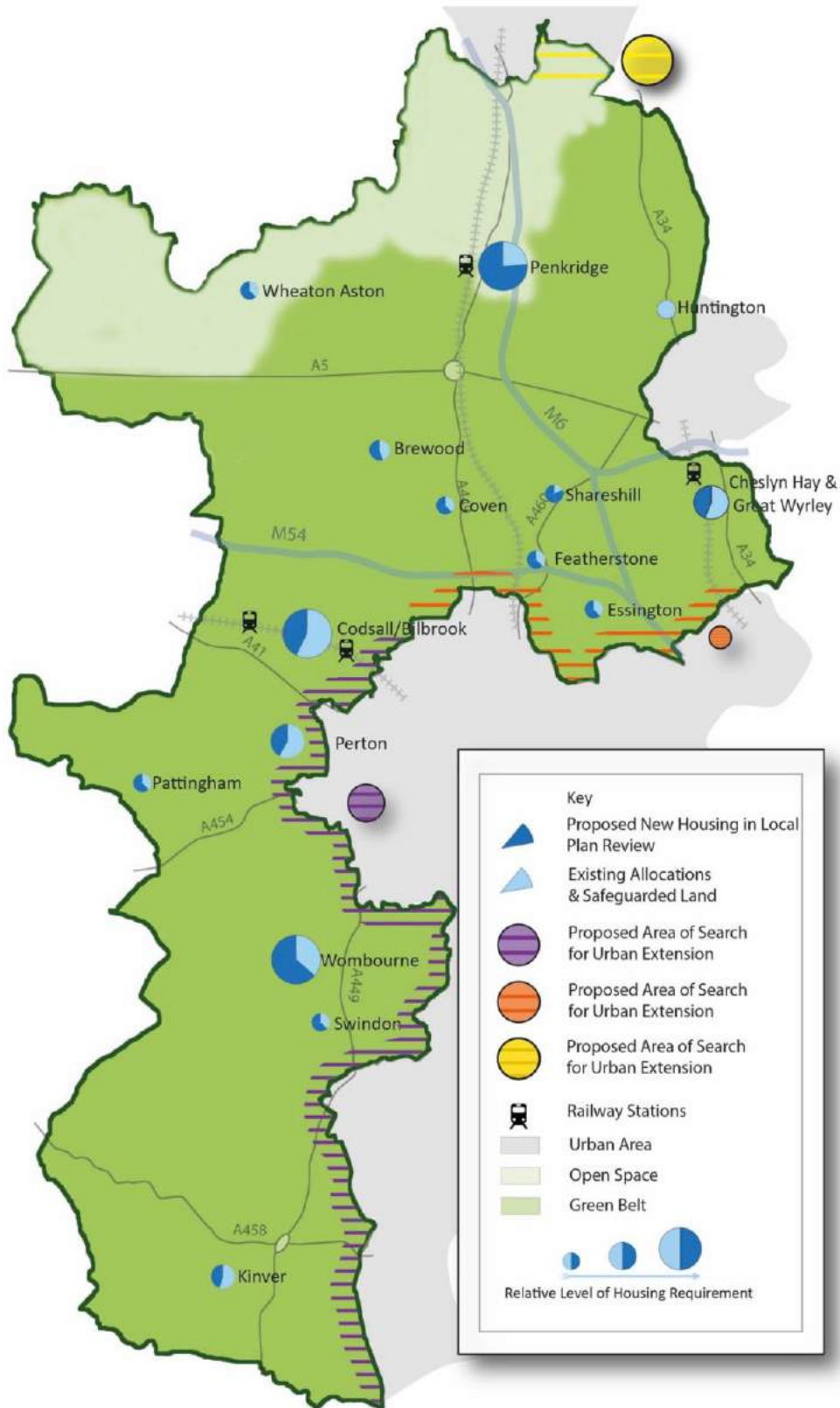


Figure F.3.1: Spatial Strategy Option B

- F.3.1.2 Spatial Option B would deliver approximately 8,203 dwellings across the Plan area, which would meet the identified housing need of 4,086 and contribute around 4,000 homes to the wider HMA. As such, a major positive impact on housing provision is identified (SA Objective 7).
- F.3.1.3 The proposed release of Green Belt and Open Countryside for development would be likely to result in the loss of previously undeveloped land and vegetation cover with carbon storage capabilities. The large scale of growth would be expected to result in an increase in carbon emissions, pollution and waste due to the construction and occupation of new development.
- F.3.1.4 Option B includes urban extensions to neighbouring urban areas, although the specific location is uncertain. There is potential for some new development to be located within or close to Flood Zones 2 and 3 in this area, particularly if an urban extension was provided adjacent to Wolverhampton to the east of Bilbrook and Codsall. The loss of undeveloped land could potentially result in a loss of vegetation and permeable soils, which help to attenuate flood risk. The proposed development at many of the identified locations under this spatial option would be in close proximity to the river network, potentially increasing the risk of contamination. Urban extensions around Wolverhampton could also potentially exacerbate existing poor air quality within Wolverhampton AQMA.
- F.3.1.5 Overall, owing to this large scale of development in Green Belt and Open Countryside locations, a major negative impact on climate change mitigation, climate change adaptation and pollution and waste (SA Objectives 1, 2 and 5) and a minor negative impact on natural resources (SA Objective 6) are identified.
- F.3.1.6 The large scale of development proposed would be likely to increase the risk of development related threats and pressures on biodiversity sites including European, national and locally designated sites in proximity to the identified locations, as well as potential cumulative loss of the ecological network through release of Green Belt and Open Countryside land. A minor negative impact on biodiversity is identified (SA Objective 3).
- F.3.1.7 The proposed development in and around Penkridge may be located adjacent or close to Cannock Chase AONB, with potential to adversely affect the setting of and views from the AONB. Development under this option could result in urban sprawl into the surrounding countryside, and lead to adverse effects on the local landscape character. Overall, a major negative effect on landscape (SA Objective 4) cannot be ruled out. Similarly, development in the Green Belt, although limited to areas of lesser harm as identified by the Green Belt Study 2019, as well as the wider Open Countryside, could potentially lead to adverse effects on the character and setting of heritage assets located within many of South Staffordshire’s rural settlements, resulting in a minor negative impact on cultural heritage (SA Objective 9).
- F.3.1.8 The distribution of growth to rural settlements would be likely to result in a large proportion of residents located outside of sustainable travel distances to healthcare facilities and employment opportunities, with limited access via public transport, leading to reliance on private car use. A minor negative impact is identified for health, transport and the economy (SA Objectives 8, 10 and 12). Conversely, all identified growth locations would be likely to ensure new residents are located within sustainable distances to schools with potential to achieve a major positive impact on access to education (SA Objective 11).

- F.3.1.9 The overall assessment findings remain unchanged since this option was originally evaluated within the Regulation 18 (II) SA.

F.4 Spatial Option C – Carry forward existing Core Strategy strategic approach to distribution

Spatial Option C

This option delivers enough housing to meet the district’s local housing need and provide around a 4,000 dwelling contribution to the unmet needs of the GBBCHMA. Under this option around 8,040 dwellings would be delivered in the district’s rural villages, with around 7,223 dwellings being directed to Tier 1 & 2 settlements and approximately 788 dwellings would be directed to Tier 3 villages.

This option adopts an approach similar to the 90/10 distribution of growth between the Main and Local Service Villages previously identified in the adopted Core Strategy. To achieve this, this option proposes that approximately 90% of growth in the plan period (excluding windfall supply and existing commitments outside of settlements) occurs in the district’s Tier 1 and 2 settlements. This recognises that these locations are largely the same as the previous Main Service Villages which took 90% of growth in the Core Strategy. New land allocations are split evenly between all Tier 1 and 2 villages under this option, recognising that the previous spatial strategy did not split Main Service Villages into Tier 1 and 2 villages (unlike the most recent Rural Services and Facilities Audit).

The remaining 10% of the plan target is focused towards the district’s Tier 3 villages, as these are largely the same settlements as the previous Local Service Villages which took 10% of growth in the Core Strategy. New land allocations to meet this 10% requirement would be split equally between all Tier 3 villages.

This option does not allocate any growth in areas which would require urban extensions of the Black Country or other neighbouring towns and cities. This recognises that such areas were not identified for growth in the previous spatial strategy. For similar reasons, no new settlements are proposed in this option.

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

F.4.1.1 Under this spatial option, the majority of growth (approximately 4,000 dwellings) would be directed towards Tier 2 settlements (Wombourne, Brewood, Kinver, Perton and Huntington), with a slightly lower proportion (approximately 3,000 dwellings) to Tier 1 settlements (Penkridge, Bilbrook/Codsall and Cheslyn Hay/Great Wyrley). Approximately 800 dwellings would be directed to Tier 3 settlements, and a small proportion to Tier 4 settlements (see **Figure F.4.1**).

Spatial Strategy: Option C

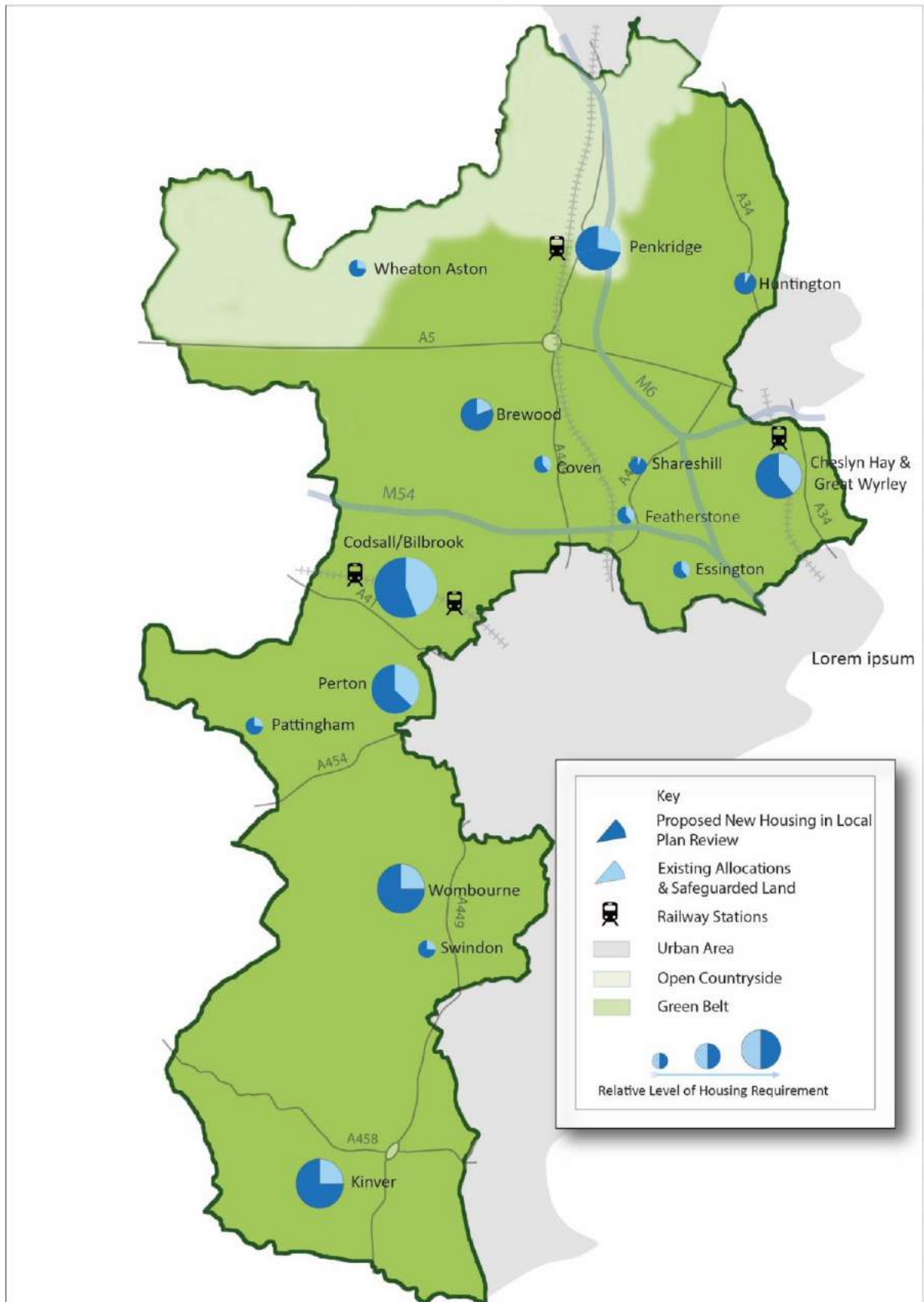


Figure F.4.1: Spatial Strategy Option C

- F.4.1.2 Spatial Option C would deliver approximately 8,230 dwellings across the Plan area, which would meet the identified housing need of 4,086 and contribute around 4,000 homes to the wider HMA. As such, a major positive impact on housing provision is identified (SA Objective 7).
- F.4.1.3 Whilst the option would provide some scope for use of previously developed land by focusing the majority of growth on Tier 1 and 2 settlements, owing to the rural nature of the district it is likely there would still be a significant loss of previously undeveloped land and vegetation cover with carbon storage capabilities. The large scale of growth would be expected to result in an increase in carbon emissions, pollution and waste due to the construction and occupation of new development.
- F.4.1.4 There is potential for some new development to be located within or close to Flood Zones 2 and 3. The loss of undeveloped land could potentially result in a loss of vegetation and permeable soils, which help to attenuate flood risk. The proposed development at many of the identified locations under this spatial option would be in close proximity to the river network, potentially increasing the risk of contamination.
- F.4.1.5 Overall, owing to this large scale of development, a major negative impact on climate change mitigation, climate change adaptation and pollution and waste (SA Objectives 1, 2 and 5) and a minor negative impact on natural resources (SA Objective 6) are identified.
- F.4.1.6 The large scale of development proposed would be likely to increase the risk of development related threats and pressures on biodiversity sites including European, national and locally designated sites in proximity to the identified locations, as well as potential cumulative loss of the ecological network. A minor negative impact on biodiversity is identified (SA Objective 3).
- F.4.1.7 The proposed development in and around Penkridge and Huntington may be located adjacent or close to Cannock Chase AONB, with potential to adversely affect the setting of and views from the AONB. Development under this option could result in urban sprawl into the surrounding countryside, and lead to adverse effects on the local landscape character. Overall, a major negative effect on landscape (SA Objective 4) cannot be ruled out. Similarly, the proposed development could potentially lead to adverse effects on the character and setting of heritage assets located within many of South Staffordshire’s rural settlements, resulting in a minor negative impact on cultural heritage (SA Objective 9).
- F.4.1.8 Under Spatial Option C, approximately 90% of development proposals would be directed towards Tier 1 and 2 settlements. New residents in these locations will be likely to have good access to a range of sustainable transport options, including rail and bus services and safe pedestrian access to local shops and amenities. However, this option would also include development in Tier 3 villages where accessibility is likely to be worse, with reliance on private cars. Overall, a minor negative impact is identified for health and transport (SA Objectives 8 and 10). Conversely, new residents are likely to be located within sustainable distances to schools and in areas with reasonable access to employment opportunities, with potential to achieve a minor positive impact on access to employment (SA Objective 12) and a major positive impact on access to education (SA Objective 11).
- F.4.1.9 The overall assessment findings remain unchanged since this option was originally evaluated within the Regulation 18 (II) SA.

F.5 Spatial Option D – Maximising sites in areas identified in the GBHMA Strategic Growth Study

Spatial Option D

This option delivers enough housing growth to meet the district’s local housing need and provide around a 4,000 dwelling contribution to the unmet needs of the GBBCHMA. Under this option, growth is maximised at villages identified as having potential for strategic levels of growth in the GBHMA Strategic Growth Study, namely Penkridge and Codsall/Bilbrook. A single urban extension would be accommodated in the area to the north of the Black Country conurbation (in the i54/ROF Featherstone corridor) whilst smaller urban extensions are allocated to the Black Country conurbation’s western edge. These reflect the opportunities for employment-led housing growth and dispersed housing sites in these locations in the Strategic Growth Study. Under this option around 5,184 dwellings would be delivered in the district’s rural villages and approximately 3,069 dwellings would be delivered in urban extensions to neighbouring urban areas or the wider rural area.

The key locations identified in the 2018 GBHMA Strategic Growth Study within South Staffordshire are as follows:

- Urban extension: North of Penkridge (1,500 – 7,500 dwellings)
- Urban extension (employment-led): North of Wolverhampton in the vicinity of i54 (1,500 – 7,500 dwellings)
- Dispersed housing sites: Western edge of the conurbation between Stourbridge and Wolverhampton (500 – 2,500 dwellings)
- Dispersed housing sites: North of Codsall/Bilbrook (500 – 2,500 dwellings)

In each of these locations, this option seeks to maximise the amount of growth likely to be realised within the plan period (i.e. up to 2041).

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

F.5.1.1 Under this spatial option, the majority of growth (approximately 4,000 dwellings) would be directed towards the Tier 1 settlements (Penkridge, Bilbrook/Codsall and Cheslyn Hay/Great Wyrley), with approximately 1,000 to Tier 2 settlements (mainly Wombourne, Perton and Kinver), and approximately 250 dwellings at Tier 3 and 4 settlements, as well as an urban extension west of the Black Country conurbation (approximately 1,600 dwellings), and at ROF Featherstone (approximately 1,200 dwellings) (see **Figure F.5.1**).

Spatial Strategy: Option D

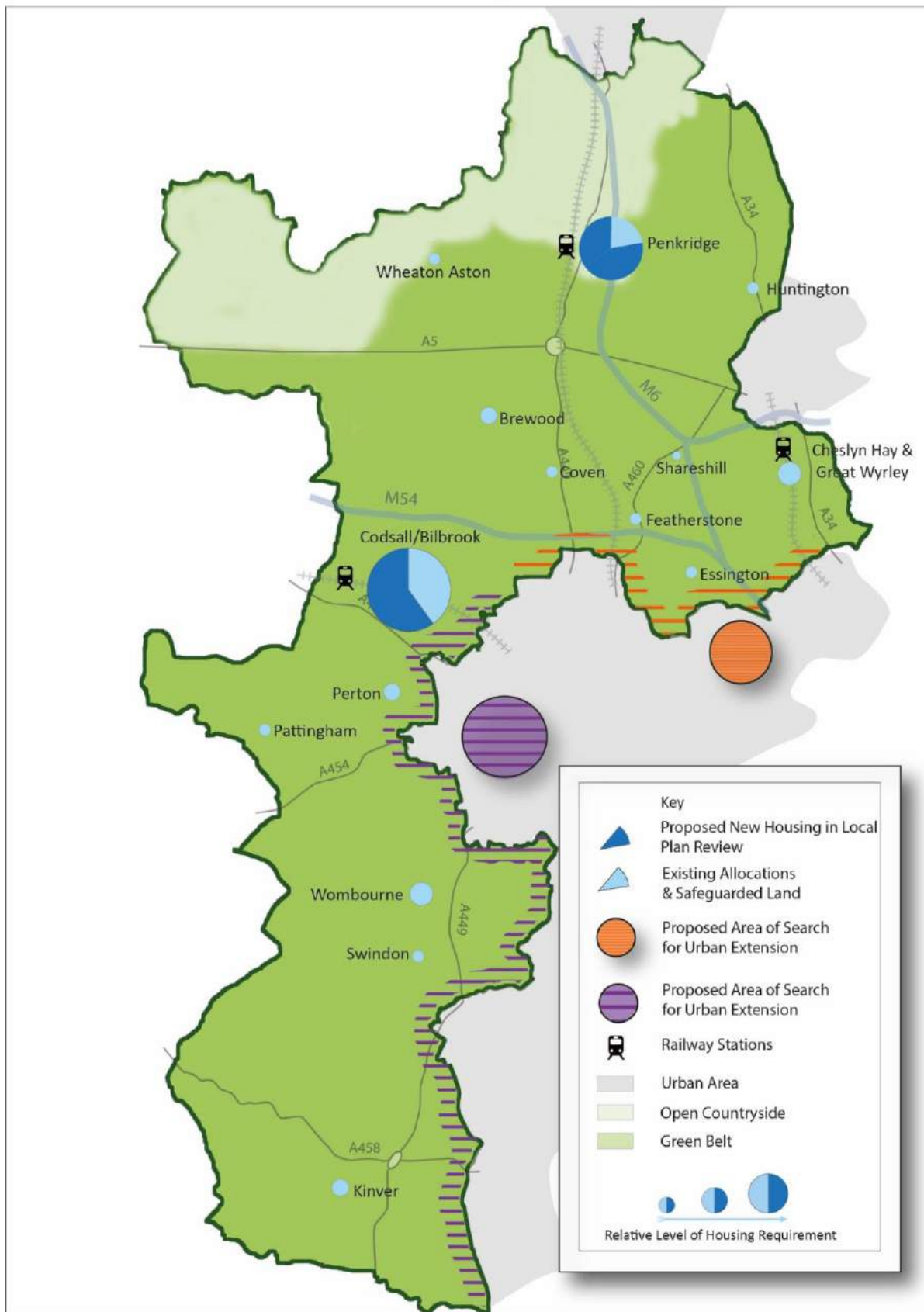


Figure F.5.1: Spatial Strategy Option D

- F.5.1.2 Spatial Option D would deliver approximately 8,253 dwellings across the Plan area, which would meet the identified housing need of 4,086 and contribute around 4,000 homes to the wider HMA. As such, a major positive impact on housing provision is identified (SA Objective 7).
- F.5.1.3 Whilst the option would provide some scope for use of previously developed land by focusing the majority of growth on Tier 1 and 2 settlements, owing to the rural nature of the district it is likely there would still be a significant loss of previously undeveloped land and vegetation cover with carbon storage capabilities. The large scale of growth would be expected to result in an increase in carbon emissions, pollution and waste due to the construction and occupation of new development.
- F.5.1.4 Option D includes extensions to neighbouring urban areas, although the specific location is uncertain. There is potential for some new development to be located within or close to Flood Zones 2 and 3, particularly around Bilbrook and Codsall. The loss of undeveloped land could potentially result in a loss of vegetation and permeable soils, which help to attenuate flood risk. The proposed development at many of the identified locations under this spatial option would be in close proximity to the river network, potentially increasing the risk of contamination. Urban extensions around Wolverhampton could also potentially exacerbate existing poor air quality within Wolverhampton AQMA.
- F.5.1.5 Overall, owing to this large scale of development, a major negative impact on climate change mitigation, climate change adaptation and pollution and waste (SA Objectives 1, 2 and 5) and a minor negative impact on natural resources (SA Objective 6) are identified.
- F.5.1.6 The large scale of development proposed would be likely to increase the risk of development related threats and pressures on biodiversity sites including European, national and locally designated sites in proximity to the identified locations, as well as potential cumulative loss of the ecological network. A minor negative impact on biodiversity is identified (SA Objective 3).
- F.5.1.7 The proposed development in and around Penkridge may be located adjacent or close to Cannock Chase AONB, with potential to adversely affect the setting of and views from the AONB. Development under this option could result in urban sprawl into the surrounding countryside, and lead to adverse effects on the local landscape character. Overall, a major negative effect on landscape (SA Objective 4) cannot be ruled out. Similarly, the proposed development could potentially lead to adverse effects on the character and setting of heritage assets located within many of South Staffordshire's rural settlements, resulting in a minor negative impact on cultural heritage (SA Objective 9).
- F.5.1.8 Under Spatial Option D, the majority of growth would be directed towards Tier 1 and 2 settlements, and to urban extensions to the Black Country. New residents in these locations will be likely to have good access to sustainable transport options, including access to key employment locations and schools. Only very small proportions of growth would be directed to lower tier settlements. Overall, a minor positive impact is identified for transport and accessibility and employment (SA Objectives 10 and 12) and a major positive impact for access to education (SA Objective 11). However, some residents may have limited access to healthcare facilities, leading to a minor negative impact on health (SA Objective 8).

- F.5.1.9 The overall assessment findings remain unchanged since this option was originally evaluated within the Regulation 18 (II) SA.

F.6 Spatial Option E – Addressing local affordability issues and settlements with the greatest needs

Spatial Option E

This option delivers enough housing growth to meet the district’s local housing need and provide around a 4,000 dwelling contribution to the unmet needs of the GBBCHMA. This option seeks to distribute new housing growth in a manner which reflects the locations from which housing needs are generated, having regard to local affordability ratios, where the district’s younger population is concentrated and the location of unmet needs arising from neighbouring authorities. Unlike the options which deliver the 4,000 dwelling contribution whilst reflecting local infrastructure opportunities and environmental constraints (e.g. Spatial Option G) or which reflect the findings of a strategic cross-authority study of sustainability and environmental/Green Belt capacity (e.g. Spatial Housing Options D), this option focuses solely on how housing growth may be distributed to meet needs where they arise.

Growth to the villages is dispersed across all four village tiers under this option, with allocations only being made within each tier at the district’s less affordable rural settlements or in those with larger proportions of younger residents. The remainder of housing growth is focused in urban extensions. Large urban extensions are focused to the north of the Black Country conurbation recognising that this broad location sits in close proximity to Wolverhampton and Walsall, which have unmet housing needs. The remaining housing requirement is split between the western edge of the Black Country and Cannock, recognising that these areas adjacent to local authorities where unmet housing needs are less acute, but that these broad locations are nonetheless adjacent to major population centres within the same housing market area as South Staffordshire.

Under this option around 4,401 dwellings would be delivered in the district’s rural villages and approximately 3,844 dwellings would be delivered in urban extensions to neighbouring urban areas or the wider rural area. The split between village growth and urban extensions seeks to provide a split between the amount of dwellings delivered adjacent to neighbouring areas and the rural settlements of South Staffordshire which is broadly consistent with the split between the district’s own needs and the unmet needs of other areas (i.e. the 4,000 dwelling contribution to the GBBCHMA).

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

F.6.1.1 Under this spatial option, a large proportion of growth (approximately 3,600 dwellings) would be directed towards urban extensions at ROF Featherstone (1,200 dwellings), north of the Black Country (1,200 dwellings), west of the Black Country (750 dwellings) and west

of Cannock (500 dwellings). Approximately 2,000 dwellings would be directed towards the Tier 1 settlements (Penkridge, Bilbrook/Codsall and Cheslyn Hay/Great Wyrley), with approximately 1,700 to Tier 2 settlements (mainly Perton, Wombourne, Brewood and Kinver), approximately 600 to Tier 3 and 4 settlements (see **Figure F.6.1**).

Spatial Strategy: Option E



Figure F.6.1: Spatial Strategy Option E

- F.6.1.2 Spatial Option E would deliver approximately 8,245 dwellings across the Plan area, which would meet the identified housing need of 4,086 and contribute around 4,000 homes to the wider HMA. As such, a major positive impact on housing provision is identified (SA Objective 7).
- F.6.1.3 Owing to the rural nature of the district and the large proportion of growth directed to urban extensions under this option, it is likely there would be a significant loss of previously undeveloped land and vegetation cover with carbon storage capabilities, despite some opportunities for use of previously developed land within Tier 1 and 2 settlements. The large scale of growth would be expected to result in an increase in carbon emissions, pollution and waste due to the construction and occupation of new development.
- F.6.1.4 There is potential for some new development to be located within or close to Flood Zones 2 and 3. The loss of undeveloped land could potentially result in a loss of vegetation and permeable soils, which help to attenuate flood risk. The proposed development at many of the identified locations under this spatial option would be in close proximity to the river network, potentially increasing the risk of contamination. Urban extensions around Wolverhampton could also potentially exacerbate existing poor air quality within Wolverhampton AQMA.
- F.6.1.5 Overall, owing to this large scale of development, a major negative impact on climate change mitigation, climate change adaptation and pollution and waste (SA Objectives 1, 2 and 5) and a minor negative impact on natural resources (SA Objective 6) are identified.
- F.6.1.6 The large scale of development proposed would be likely to increase the risk of development related threats and pressures on biodiversity sites including European, national and locally designated sites in proximity to the identified locations, as well as potential cumulative loss of the ecological network. A minor negative impact on biodiversity is identified (SA Objective 3).
- F.6.1.7 The proposed development in and around Penkridge and urban extension west of Cannock may be located adjacent or close to Cannock Chase AONB, with potential to adversely affect the setting of and views from the AONB. Development under this option could result in urban sprawl into the surrounding countryside, and lead to adverse effects on the local landscape character. Overall, a major negative effect on landscape (SA Objective 4) cannot be ruled out. Similarly, the proposed development could potentially lead to adverse effects on the character and setting of heritage assets located within many of South Staffordshire’s rural settlements, resulting in a minor negative impact on cultural heritage (SA Objective 9).
- F.6.1.8 Under Spatial Option E, the majority of growth would be directed towards Tier 1 and 2 settlements, and to urban extensions to the Black Country. New residents in these locations will be likely to have good access to sustainable transport options, including access to key employment locations and schools. Only very small proportions of growth would be directed to lower tier settlements. Overall, a minor positive impact is identified for transport and accessibility and employment (SA Objectives 10 and 12) and a major positive impact for access to education (SA Objective 11). However, some residents may have limited access to healthcare facilities, leading to a minor negative impact on health (SA Objective 8).

- F.6.1.9 The overall assessment findings remain unchanged since this option was originally evaluated within the Regulation 18 (II) SA.

F.7 Spatial Option F – Giving first consideration to Green Belt land which is previously developed or well-served by public transport

Spatial Option F

This option delivers enough housing growth to meet the district's local housing need and provide around a 4,000 dwelling contribution to the unmet needs of the GBBCHMA. Under this option around 4,624 dwellings would be delivered in the district's rural villages and 3,625 dwellings would be delivered in urban extensions to neighbouring urban areas or the wider rural area. Additional allocations are only made to villages with the best public transport links (i.e. Tier 1 villages with rail access) or villages with significant amounts of available previously developed land in the Green Belt (i.e. Wombourne). The remaining plan requirement is allocated to sites on the fringes of housing market area towns and cities (i.e. the Black Country and Cannock), recognising that these settlements offer shorter bus trips to higher order service centres in these areas.

The aim of this Spatial Option is to present a strategy that focuses primarily on the NPPF requirement to give first consideration to *"land which has been previously-developed and/or is well-served by public transport"* when releasing Green Belt, whilst also ensuring that enough Green Belt land is released to deliver 4,000 dwellings to the unmet needs of the GBBCHMA. Therefore, additional allocations are only made to settlements with the best public transport links (i.e. Tier 1 settlements) or settlements with significant opportunities to expand onto previously developed land in the Green Belt, subject to land availability issues being addressed (i.e. Wombourne). The remaining plan requirement is allocated to sites on the fringes of housing market area towns and cities (i.e. the Black Country and Cannock). Accommodating the remainder of the housing target on the urban fringe recognises that, compared to rural villages without rail links, these areas offer public transport links in the closest proximity to higher order service centres in these areas.

This Spatial Option also releases an amount of land within the wider Open Countryside which has regard to *"the consequences for sustainable development of channelling development ... towards locations beyond the outer Green Belt boundary"*, in accordance with the NPPF. To achieve this, allocations are also made within Open Countryside locations where there is available and potentially deliverable land to deliver growth through urban extensions or allocations to Tier 1 settlements. This recognises that such Tier 1 settlements and urban extensions to neighbouring areas performed particularly well in the 2018 Issues and Options consultation Sustainability Appraisal.

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

F.7.1.1 Under this spatial option, the majority of growth (approximately 3,200 dwellings) would be directed towards the Tier 1 settlements (Penkridge, Bilbrook/Codsall and Cheslyn Hay/Great Wyrley), with approximately 1,200 to Tier 2 settlements (mainly Wombourne, Perton and Kinver), and approximately 250 dwellings at Tier 3 and 4 settlements, as well as an urban extension north and west of the Black Country conurbation (approximately 3,000 dwellings), with smaller urban extensions west of Cannock (200 dwellings) and south of Stafford (80 dwellings) (see **Figure F.7.1**).

Spatial Strategy: Option F

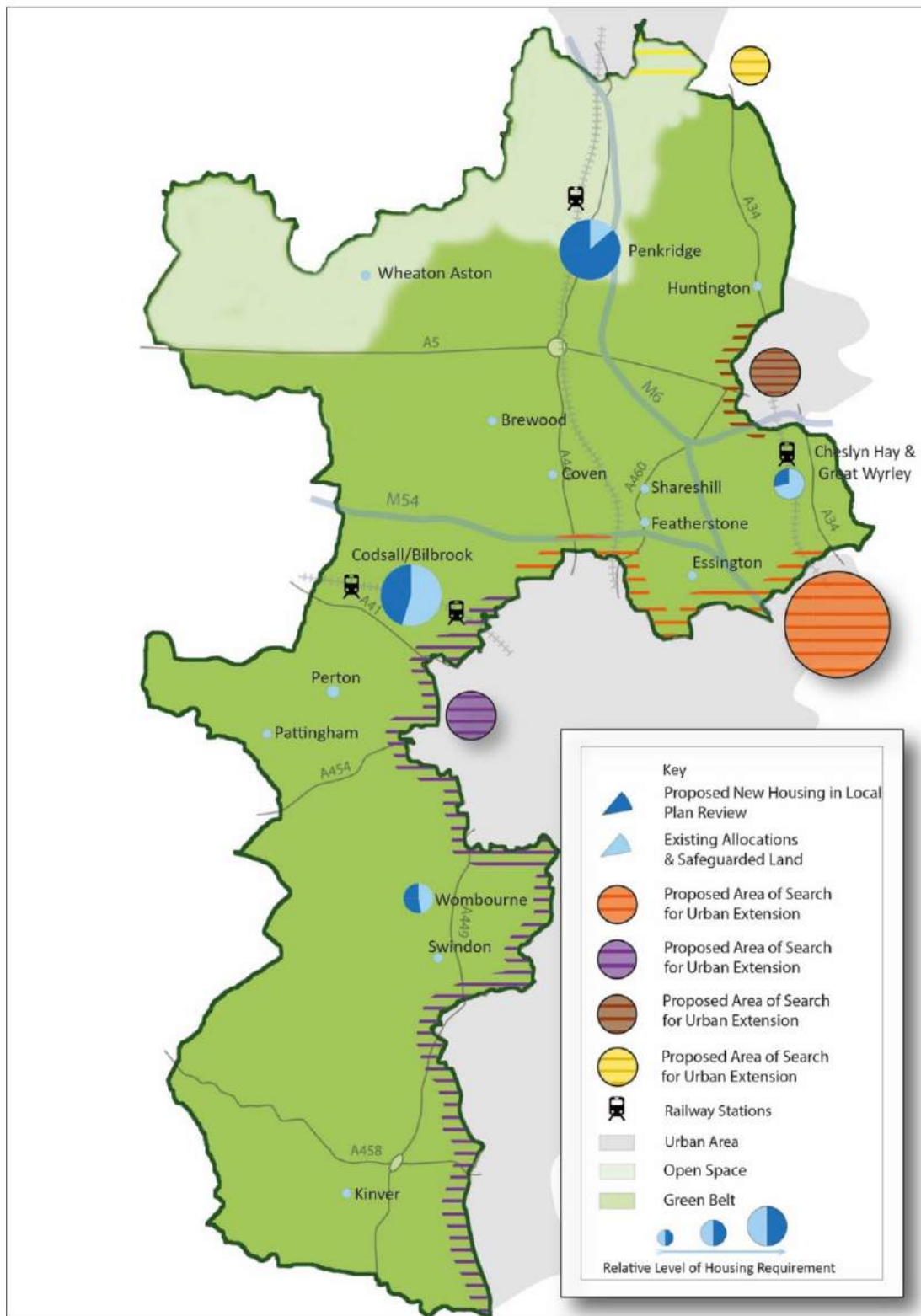


Figure F.7.1: Spatial Strategy Option F

F.7.1.2 Spatial Option F would deliver approximately 8,249 dwellings across the Plan area, which would meet the identified housing need of 4,086 and contribute around 4,000 homes to the wider HMA. As such, a major positive impact on housing provision is identified (SA Objective 7).

- F.7.1.3 This option would give first consideration to development on previously developed land. However, there are limited brownfield locations within South Staffordshire which are available for development, and so it is likely that the majority of development would be on previously undeveloped land, resulting in a significant loss of soil resource and vegetation cover with carbon storage capabilities. The large scale of growth would be expected to result in an increase in carbon emissions, pollution and waste due to the construction and occupation of new development.
- F.7.1.4 There is potential for some new development to be located within or close to Flood Zones 2 and 3. The loss of undeveloped land could potentially result in a loss of vegetation and permeable soils, which help to attenuate flood risk. The proposed development at many of the identified locations under this spatial option would be in close proximity to the river network, potentially increasing the risk of contamination. Urban extensions around Wolverhampton could also potentially exacerbate existing poor air quality within Wolverhampton AQMA.
- F.7.1.5 Overall, owing to this large scale of development, a major negative impact on climate change mitigation, climate change adaptation and pollution and waste (SA Objectives 1, 2 and 5) and a minor negative impact on natural resources (SA Objective 6) are identified.
- F.7.1.6 The large scale of development proposed would be likely to increase the risk of development related threats and pressures on biodiversity sites including European, national and locally designated sites in proximity to the identified locations, as well as potential cumulative loss of the ecological network. A minor negative impact on biodiversity is identified (SA Objective 3).
- F.7.1.7 The proposed development in and around Penkridge and urban extension west of Cannock may be located adjacent or close to Cannock Chase AONB, with potential to adversely affect the setting of and views from the AONB. Development under this option could result in urban sprawl into the surrounding countryside, and lead to adverse effects on the local landscape character. Overall, a major negative effect on landscape (SA Objective 4) cannot be ruled out. Similarly, the proposed development could potentially lead to adverse effects on the character and setting of heritage assets located within many of South Staffordshire's rural settlements, resulting in a minor negative impact on cultural heritage (SA Objective 9).
- F.7.1.8 Under Spatial Option F, the majority of growth would be directed towards Tier 1 and 2 settlements, and to urban extensions to the Black Country. New residents in these locations will be likely to have good access to sustainable transport options, including access to key employment locations and schools. Only very small proportions of growth would be directed to lower tier settlements. Overall, a minor positive impact is identified for transport and accessibility and employment (SA Objectives 10 and 12) and a major positive impact for access to education (SA Objective 11). However, some residents may have limited access to healthcare facilities, leading to a minor negative impact on health (SA Objective 8).
- F.7.1.9 The overall assessment findings remain unchanged since this option was originally evaluated within the Regulation 18 (II) SA.

F.8 Spatial Option G – Infrastructure-led development with a garden village area of search beyond the plan period

Spatial Option G

This option delivers enough housing growth to meet the district’s local housing need and provide around a 4,000 dwelling contribution to the unmet needs of the GBBCHMA. Under this option around 4,668 dwellings would be delivered in the district’s rural villages and 3,515 dwellings would be delivered in urban extensions to neighbouring urban areas or the wider rural area. Growth on strategic sites would be prioritised in locations where it could help to meet local infrastructure needs and opportunities, with smaller allocations being made in other broad locations having regard to their local environmental constraints. Urban extensions are provided across all neighbouring authorities within the Greater Birmingham Housing Market Area (GBHMA) with unmet housing needs to ensure that the district’s contribution to the GBHMA shortfall is met in locations from which households are being displaced.

Growth in the villages is dispersed across all four village tiers under this option. A larger proportion of housing growth is focused on Tier 1 and 2 villages where significant opportunities to achieve infrastructure improvements through new development exist, having regard to other environmental constraints (e.g. historic settlements with extensive Conservation Areas or settlements constrained by a designated landscape).

Larger urban extensions are focused to the north of the Black Country conurbation, recognising the availability of larger sites in this location and the opportunities to deliver strategic infrastructure needs around the ROF strategic employment site. The remaining housing requirement is split between the western edge of the Black Country and south of Stafford, in a manner that recognises the Black Country’s role in contributing to the unmet housing needs of the HMA.

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

F.8.1.1 Under this spatial option, a large proportion of proposed growth (approximately 3,200 dwellings) would be directed towards the Tier 1 settlements (Penkrigde, Bilbrook/Codsall and Cheslyn Hay/Great Wyrley), with approximately 1,200 to Tier 2 settlements (mainly Wombourne, Perton and Kinver), and a small proportion (approximately 250 dwellings) at Tier 3 and 4 settlements. A large proportion of growth (approximately 3,300 dwellings) would be delivered through an urban extension north and west of the Black Country

conurbation (approximately 2,000 dwellings), ROF Featherstone (1,200 dwellings) and south of Stafford (80 dwellings) (see **Figure F.8.1**).

Spatial Strategy: Option G

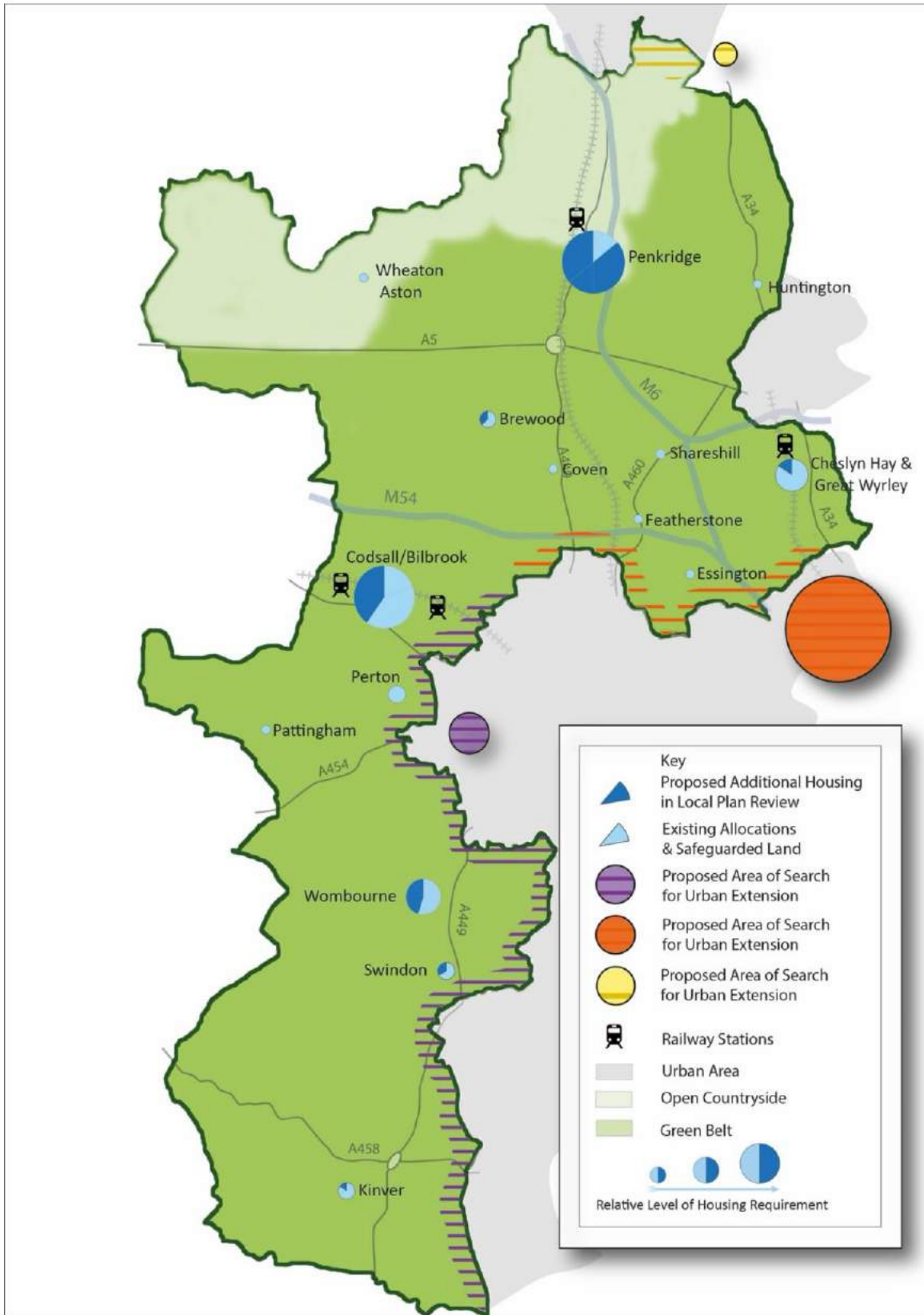


Figure F.8.1: Spatial Strategy Option G

- F.8.1.2 Spatial Option G would deliver approximately 8,183 dwellings across the Plan area, which would meet the identified housing need of 4,086 and contribute around 4,000 homes to the wider HMA. As such, a major positive impact on housing provision is identified (SA Objective 7).
- F.8.1.3 Owing to the rural nature of the district and the large proportion of growth directed to urban extensions under this option, it is likely there would be a significant loss of previously undeveloped land and vegetation cover with carbon storage capabilities, despite some opportunities for use of previously developed land within Tier 1 and 2 settlements. The large scale of growth would be expected to result in an increase in carbon emissions, pollution and waste due to the construction and occupation of new development.
- F.8.1.4 Option G includes extensions to neighbouring urban areas, although the specific location is uncertain. There is potential for some new development to be located within or close to Flood Zones 2 and 3, particularly around Bilbrook and Codsall. The loss of undeveloped land could potentially result in a loss of vegetation and permeable soils, which help to attenuate flood risk. The proposed development at many of the identified locations under this spatial option would be in close proximity to the river network, potentially increasing the risk of contamination. Urban extensions around Wolverhampton could also potentially exacerbate existing poor air quality within Wolverhampton AQMA.
- F.8.1.5 Overall, owing to this large scale of development, a major negative impact on climate change mitigation, climate change adaptation and pollution and waste (SA Objectives 1, 2 and 5) and a minor negative impact on natural resources (SA Objective 6) are identified.
- F.8.1.6 The large scale of development proposed would be likely to increase the risk of development related threats and pressures on biodiversity sites including European, national and locally designated sites in proximity to the identified locations, as well as potential cumulative loss of the ecological network. A minor negative impact on biodiversity is identified (SA Objective 3).
- F.8.1.7 The proposed development in and around Penkridge may be located adjacent or close to Cannock Chase AONB, with potential to adversely affect the setting of and views from the AONB. Although the option seeks to have regard to historic and landscape constraints, development under this option could result in urban sprawl into the surrounding countryside, and lead to adverse effects on the local landscape character. Overall, a major negative effect on landscape (SA Objective 4) cannot be ruled out. Similarly, the proposed development could potentially lead to adverse effects on the character and setting of heritage assets located within many of South Staffordshire's rural settlements, resulting in a minor negative impact on cultural heritage (SA Objective 9).
- F.8.1.8 Spatial Option G focuses on infrastructure-led development, with the majority of growth directed towards Tier 1 and 2 settlements, and urban extensions with opportunities for strategic growth linked to key employment locations and sustainable transport options. Overall, a minor positive impact is identified for transport (SA Objective 10) and a major positive impact for access to education and employment (SA Objectives 11 and 12). However, some residents may have limited access to healthcare facilities, leading to a minor negative impact on health (SA Objective 8).
- F.8.1.9 The overall assessment findings remain unchanged since this option was originally evaluated within the Regulation 18 (II) SA.

F.9 Spatial Option H – Limited Green Belt development only to meet existing critical infrastructure needs

Spatial Option H

This option meets the district’s own local housing need across the revised plan period of 2023-2041, but does not deliver enough housing growth to provide a contribution to the unmet needs of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). Under this option, new housing growth to meet local housing needs is limited solely to sustainable and deliverable allocations in non-Green Belt locations, including safeguarded land and Open Countryside sites.

Under this option housing growth during the plan period would be focused on the district’s rural villages. The majority of new housing growth would be located in the district’s Tier 1 settlements, particularly in Penkridge and Codsall/Bilbrook. Green Belt allocations for housing are only made where this would be necessary for the delivery of critical infrastructure, specifically to facilitate new education infrastructure in the Codsall/Bilbrook area. This follows the NPPF’s statement that Green Belt boundaries are not required to be reviewed or changed when plans are being prepared and updated and that it is authorities choice to review Green Belt boundaries if they consider exceptional circumstances exist, meaning that Green Belt is only released for housing under this option if strictly necessary to achieve delivery of critical infrastructure.

This Spatial Option also releases an amount of land within the wider Open Countryside which has regard to “*the consequences for sustainable development of channelling development ... towards locations beyond the outer Green Belt boundary*”, in accordance with the NPPF. New allocations in the Open Countryside are therefore focused into suitable and potentially deliverable land adjacent to Tier 1 settlements and neighbouring towns and cities. This recognises that Tier 1 settlements and extensions to neighbouring towns and cities performed particularly well in the 2018 Issues and Options consultation Sustainability Appraisal.

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

F.9.1.1 Under this spatial option, the majority of growth (approximately 2,500 dwellings) would be directed towards the Tier 1 settlements (Penkridge, Bilbrook/Codsall and Cheslyn Hay/Great Wyrley), with approximately 1,000 to Tier 2 settlements (mainly Perton, Wombourne and Kinver), and approximately 250 dwellings at Tier 3 and Tier 4 settlements. A small proportion of growth (approximately 80 dwellings) would be directed towards an urban extension to the south of Stafford (see **Figure F.9.1**).

Spatial Strategy: Option H

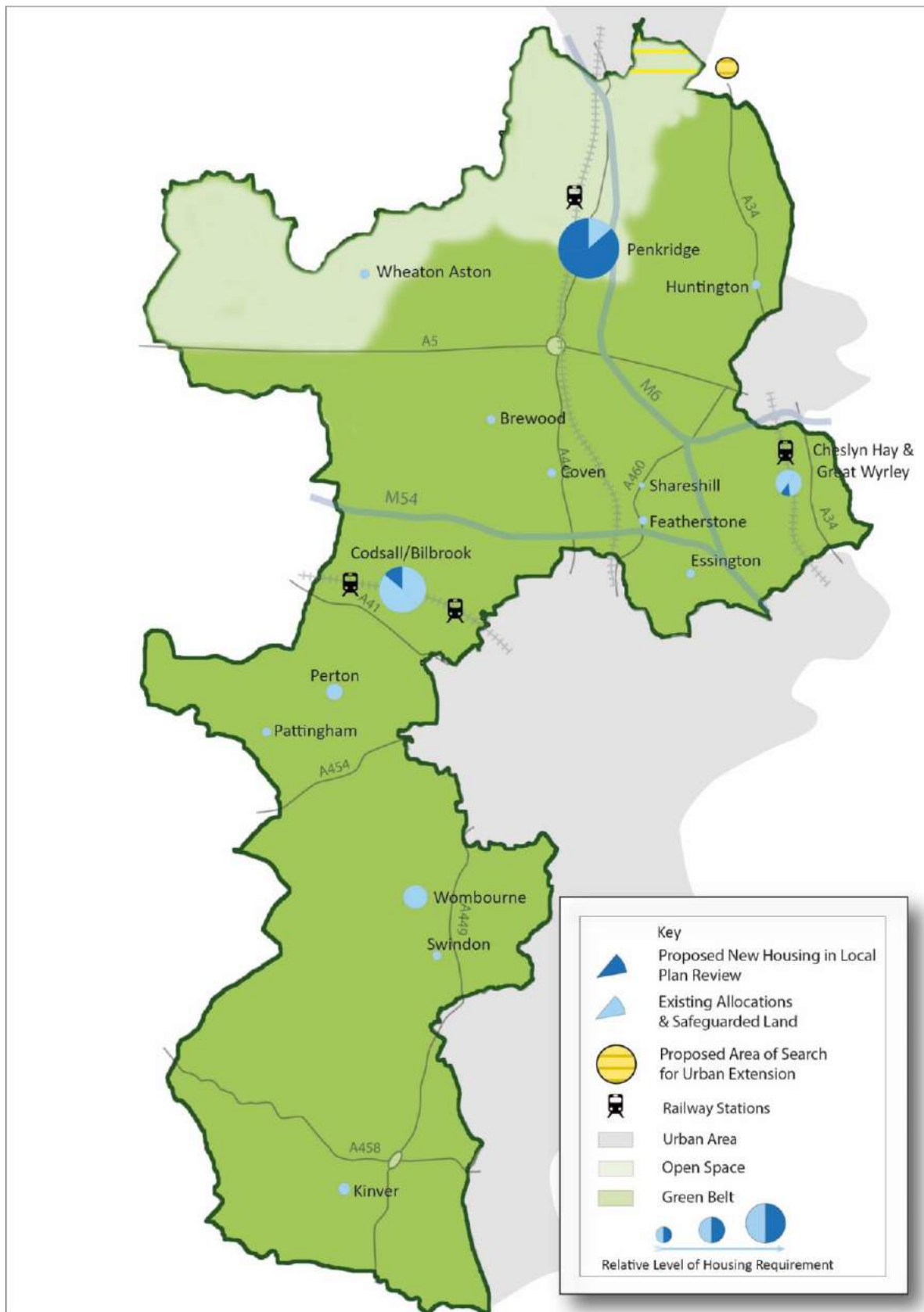


Figure F.9.1: Spatial Strategy Option H

F.9.2 SA Objective 1 – Climate Change Mitigation

F.9.2.1 The proposed development of around 4,000 new dwellings across the Plan area under this spatial option could potentially result in the loss of greenfield land and vegetation cover which have carbon storage capabilities. It would also be expected to result in an increase in carbon emissions due to the construction and occupation of development, including increased emissions from domestic and transport sources. Overall, a major negative impact on climate change mitigation is identified.

F.9.3 SA Objective 2 – Climate Change Adaptation

F.9.3.1 The north east and west of Penkridge and the north west and north east of Bilbrook/Codsall are located within Flood Zone 2 and 3, although an urban extension to the south of Stafford is likely to be located within Flood Zone 1. Approximately 2,000 dwellings are proposed within Penkridge and Bilbrook/Codsall, therefore, Spatial Option H could potentially locate some new development within or in proximity to Flood Zones 2 or 3. The proposed development could potentially locate residents in areas at risk of flooding and reduce the flood storage capacity in the area.

F.9.3.2 As Spatial Option H directs development to safeguarded land and Open Countryside sites, although there would be very limited Green Belt release, it is nonetheless likely that the majority of development would be located on previously undeveloped land. Development would be likely to result in a net loss of vegetation cover and permeable soils, which help to attenuate flood risk, and therefore, could potentially result in the exacerbation of flood risk across many of these locations. This could potentially result in detrimental impacts in regard to human health and safety.

F.9.3.3 As it cannot be ruled out that development proposals under this option would not be located within Flood Zone 3 or on land identified at high risk of surface water flooding, a major negative impact is identified.

F.9.4 SA Objective 3 – Biodiversity and Geodiversity

F.9.4.1 Potential adverse impacts on Habitats sites following the development proposed in the LPR will be considered in the HRA. Some development proposals could potentially increase threats and pressures which could result in detrimental impacts on these sites. For example, development located to the north east of the Plan area may lie within 15km of Cannock Chase SAC where adverse effects as a result of increased recreational pressure would require mitigation.

F.9.4.2 Cannock Extension Canal SSSI and Stowe Pool and Walk Mill Clay Pit SSSI are located in close proximity to Cheslyn Hay/Great Wyrley. Motte Meadows SSSI is located in close proximity to Wheaton Ashton, and Kinver Edge SSSI is located adjacent to the Kinver settlement boundary. The south of Stafford urban extension is likely to be located in close proximity to Cannock Chase SSSI.

F.9.4.3 Wyrley & Essington Canal LNR is located to the south west of Cheslyn Hay/Great Wyrley. The south of Stafford urban extension could potentially be located in close proximity to Brocton LNR. The north of Wombourne is adjacent to stands of ancient woodland.

F.9.4.4 Although Spatial Option H would be unlikely to result in the direct loss of designated biodiversity sites, a number of European, national and locally designated sites are located in close proximity to some of the identified locations for proposed for development. The proposed development at Penkridge, Huntington, Cheslyn Hay/Great Wyrley, Wheaton Ashton, Kinver, Wombourne and the proposed urban extension south of Stafford could potentially increase the risk of development-related threats and pressures to surrounding biodiversity sites. As a result, the development proposals under this option could potentially result in a minor negative impact on local biodiversity.

F.9.5 SA Objective 4 – Landscape and Townscape

F.9.5.1 Cannock Chase AONB is located to the north east of South Staffordshire. The proposed development in and around Penkridge and Huntington, and the proposed urban extension south of Stafford, could potentially be adjacent or in close proximity to the AONB. Due to the proximity of these locations, the proposed development could potentially alter the setting of, and views experienced from, the AONB.

F.9.5.2 It is expected that the proposed development at any of the locations identified within this spatial option would alter the view experienced by users of the local PRoW network and local residents to some extent.

F.9.5.3 As development under this spatial option is likely to be located on previously undeveloped land (safeguarded land and Open Countryside sites), the proposed development would be expected to result in urban sprawl into the surrounding countryside. The proposed development in these locations could potentially be discordant with the local landscape character. Overall, a major negative impact on the local landscape cannot be ruled out.

F.9.6 SA Objective 5 – Pollution and Waste

F.9.6.1 There is an extensive river network within South Staffordshire including the River Penk, the Staffordshire and Worcestershire Canal and Shropshire Union Canal. The proposed development at many of the locations identified under this spatial option would be in close proximity to a watercourse and could potentially increase the risk of water contamination.

F.9.6.2 The north of Wombourne is located within the inner and outer zones of a groundwater SPZ (Zones I and II). Several other identified locations for growth under this option including Bilbrook/Codsall, Perton and Wombourne are located within the catchment of a groundwater SPZ (Zone III). The urban extension south of Stafford would also likely be located within Zone III. The proposed development could potentially increase the risk of groundwater contamination at these locations.

F.9.6.3 The south east of Bilbrook/Codsall is located in close proximity to 'Wolverhampton' AQMA. The north east of Cheslyn Hay/Great Wyrley is located in close proximity to 'CCDC AQMA 2'. The construction and occupation of development at these locations would be likely to expose site end users to poor air quality and potentially exacerbate air pollution through the introduction of additional people and associated car movements.

F.9.6.4 The A449 passes through Penkridge and the M6 is located to the east of the settlement. The A34 passes to the east of Great Wyrley and the M6 Toll is located to the north of Cheslyn Hay/ Great Wyrley. The A449 passes to the east of Wombourne. New residents

located in these locations could potentially be exposed to higher levels of air and noise pollution associated with these main roads. As a rural district, it is anticipated that new residents would have a high reliance on private car use which could potentially exacerbate air pollution issues in these areas with adverse impacts for local air quality and residents' health.

- F.9.6.5 Furthermore, the introduction of around 4,000 new dwellings would be likely to result in a significant increase in household waste produced.
- F.9.6.6 Overall, owing to the large scale of growth proposed, a major negative impact on pollution and waste is identified.

F.9.7 SA Objective 6 – Natural Resources

- F.9.7.1 The majority of South Staffordshire is located on Grade 2 and 3 ALC land. The south of Stafford urban extension could potentially be located on Grade 3 land. ALC Grades 1 and 2, and potentially Grade 3, comprise some of the best and most versatile (BMV) agricultural land. Development proposed in these locations could potentially result in the loss of this agriculturally important soil resource. However, Bilbrook/Codsall and Cheslyn Hay/Great Wyrley are primarily located on land classed as 'urban' presenting some opportunities for efficient use of natural resources.
- F.9.7.2 Spatial Option H aims to give first consideration to development on non-Green Belt locations. Although it is possible this may include some brownfield land, the majority of growth will be directed towards the district's rural villages as well as land within the wider Open Countryside. As there are limited brownfield locations within South Staffordshire which are available for development, the majority of development under Spatial Option H would likely be on previously undeveloped land. Development proposals directed towards previously undeveloped locations could potentially result in a permanent and irreversible net loss of ecologically and agriculturally valuable soils caused by excavation, compaction, erosion, contamination and removal of vegetation cover. As a result, this spatial option would be likely to have a minor negative impact on soil resources within South Staffordshire.

F.9.8 SA Objective 7 – Housing

- F.9.8.1 Spatial Option H would be expected to meet the identified housing need for South Staffordshire of 4,086 dwellings, but would not make any contribution towards the unmet housing need of the wider HMA. As such, relative to the other options, a minor positive impact on housing provision is identified.

F.9.9 SA Objective 8 – Health and Wellbeing

- F.9.9.1 Given South Staffordshire is primarily rural district, and growth under this Spatial Option will be focused towards rural settlements, it is anticipated that the majority of new residents under this spatial option would have good access to a diverse range of natural habitats. In addition, all of the locations identified under this spatial option are in close proximity to a PRow. Both of these factors will be likely to have physical and mental health benefits for local residents through encouraging outdoor exercise and recreation.

- F.9.9.2 There are no NHS hospitals with an A&E department located within South Staffordshire. All locations identified under this spatial option would be likely to situate new residents in a location with limited access to emergency healthcare. Development proposals located in Penkridge, Wheaton Ashton, Brewood, Cheslyn Hay/Great Wyrley, Bilbrook/Codsall, Essington, Featherstone, Perton, Pattingham, Wombourne and Kinver would be likely to situate new residents in close proximity to a GP surgery. Penkridge, Bilbrook/Codsall, Cheslyn Hay/Great Wyrley and Wombourne are located in close proximity to a leisure centre. New residents in these locations will be likely to have good access to these services.
- F.9.9.3 Overall, given that a proportion of residents would be likely to be located outside of the sustainable travel distance to healthcare facilities, a minor negative impact on health and wellbeing is identified.

F.9.10 SA Objective 9 – Cultural Heritage

- F.9.10.1 There are numerous Grade I, II* and II Listed Buildings located across South Staffordshire. The proposed development at many of the locations identified under this spatial option would likely be situated in close proximity to a Listed Building, with potential to affect their setting or significance.
- F.9.10.2 'Rodbaston Old Hall moated site and fishpond' SM is located approximately 500m south of Penkridge. Approximately 1,200 dwellings are proposed in and around Penkridge. As a result, development proposals under this spatial option could potentially alter the setting of this SM. Penkridge also coincides with 'Penkridge' Conservation Area, and 'Codsall Bilbrook and Oaken' Conservation Area is located to the west of Bilbrook/Codsall. Development proposals directed towards these two settlements could potentially have a minor negative impact on the setting of these Conservation Areas.
- F.9.10.3 Negative impacts on local heritage assets would be largely dependent on the layout and design of development proposed. By directing development to rural villages and the Open Countryside, the development proposed under Spatial Option H will likely be situated on previously undeveloped land. Due to the potential close proximity of the identified locations under Spatial Option H to local heritage assets, a minor negative impact cannot be ruled out.

F.9.11 SA Objective 10 – Transport and Accessibility

- F.9.11.1 There are four railway stations located within South Staffordshire. Penkridge is served by Penkridge Station, Bilbrook/Codsall are served by Bilbrook Station and Codsall Station, and Cheslyn Hay/Great Wyrley are served by Landywood Station. All other locations identified for future development under Spatial Option H could potentially located site end users in areas with limited access to rail services.
- F.9.11.2 By directing a higher proportion of development to the Tier 1 and 2 settlements under this spatial option, it is likely that the majority of new residents would good access to sustainable transport options. Large proportions of new residents would likely be inside the sustainable travel distance to a bus stop providing regular services to surrounding towns and villages.

F.9.11.3 However, some development under this spatial option would be located in more rural locations, which may include settlements linked by country roads and narrow lanes. These roads typically do not have footpaths or safe pedestrian access. As a result, by directing residents to more rural locations under this spatial option, it increases the likelihood that residents would not have safe pedestrian access to local services.

F.9.11.4 Approximately 3,500 dwellings would be directed towards Tier 1 and 2 settlements under Spatial Option H. A large proportion of new residents in Tier 1 and 2 settlements will be likely to have sustainable access to bus and rail services and as such, would likely rely less heavily on private car use. Therefore, this spatial option will be likely to have a minor positive impact on transport and accessibility.

F.9.12 SA Objective 11 – Education

F.9.12.1 All of the settlements identified for development under this spatial option will likely be situated in close proximity to a primary school.

F.9.12.2 Secondary schools within South Staffordshire are primarily located in Tier 1 settlements. The proposed development in Penkridge, Bilbrook/Codsall, Wombourne and Kinver will be likely to provide new residents with good access to secondary education. Some secondary schools are also located at the urban boundary of Stafford, Cannock, Wolverhampton and Stourbridge. The proposed development at Brewood, Perton, Essington, Coven, Wheaton Aston, Huntington, Featherstone, Pittingham and Swindon would however be likely to situate new residents in locations with limited access to secondary education.

F.9.12.3 Under this spatial option, over 2,000 dwellings will be directed towards Tier 1 settlements. New residents located in Penkridge and Bilbrook /Codsall will be likely to have excellent access to primary and secondary education. Furthermore, this spatial option allows for the use of Green Belt land where necessary to facilitate new education infrastructure. Therefore, an overall major positive impact on access to education is identified for Spatial Option H.

F.9.13 SA Objective 12 – Economy and Employment

F.9.13.1 Penkridge, Cheslyn Hay/Great Wyrley, Featherstone and Bilbrook/Codsall have been identified as key employment areas within the district. The majority of residents within South Staffordshire currently commute to employment opportunities in Wolverhampton, Dudley, Walsall and Birmingham. Development proposals directed towards Penkridge, Bilbrook/Codsall and Cheslyn Hay/Great Wyrley will be likely to have good access to these out-of-district employment areas. Development proposals directed towards Essington, Featherstone, Shareshill, Coven and Brewood will be likely to have reasonable access to out-of-district employment areas.

F.9.13.2 Overall, approximately 2,700 dwellings would be directed towards locations with good or reasonable sustainable access to employment opportunities either within the district or in surrounding areas. As the majority of development would be located in areas with good or reasonable sustainable access to employment opportunities, Spatial Option H would be likely to have a minor positive impact on the local economy.

F.10 Spatial Option I – Limited contribution towards GBBCHMA needs and limited Green Belt development in Tier 1 settlements

Spatial Option I

This option meets the district’s own local housing need across the revised plan period of 2023-2041, and delivers enough housing growth to provide a contribution of around 640 dwellings to the unmet needs of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). Under this option, new housing growth is primarily focused on sustainable and deliverable allocations in non-Green Belt locations, including safeguarded land and Open Countryside sites, alongside additional Green Belt allocations made adjacent to Tier 1 settlements.

Under this option housing growth during the plan period would be focused on the district’s rural villages. The majority of new housing growth would be located in the district’s Tier 1 settlements, particularly in Penkridge and Codsall/Bilbrook. Green Belt allocations for housing are only made on sites which can be made suitable and deliverable adjacent to Tier 1 settlements, having regard to local site constraints and infrastructure capacity. This approach reflects the NPPF statement that Green Belt boundaries are not required to be reviewed or changed when plans are being prepared and updated and that it is authorities choice to review Green Belt boundaries if they consider exceptional circumstances exist. It balances this against the NPPF’s steer that, should Green Belt boundary changes be considered, first consideration should be given to areas well-served by public transport and previously developed land.

This Spatial Option also releases an amount of land within the wider Open Countryside which has regard to “*the consequences for sustainable development of channelling development ... towards locations beyond the outer Green Belt boundary*”, in accordance with the NPPF. New allocations in the Open Countryside are therefore focused into suitable and potentially deliverable land adjacent to Tier 1 or 2 settlements and neighbouring towns and cities. This recognises that Tier 1 and 2 settlements and extensions to neighbouring towns and cities performed particularly well in the 2018 Issues and Options consultation Sustainability Appraisal.

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

F.10.1.1 Under this spatial option, the majority of growth (approximately 3,200 dwellings) would be directed towards the Tier 1 settlements (Penkridge, Bilbrook/Codsall and Cheslyn Hay/Great Wyrley), with approximately 1,000 to Tier 2 settlements (mainly Perton, Wombourne and Kinver), and approximately 250 dwellings at Tier 3 and Tier 4 settlements.

A small proportion of growth (approximately 80 dwellings) would be directed towards an urban extension to the south of Stafford (see **Figure F.10.1**).

Spatial Strategy: Option I

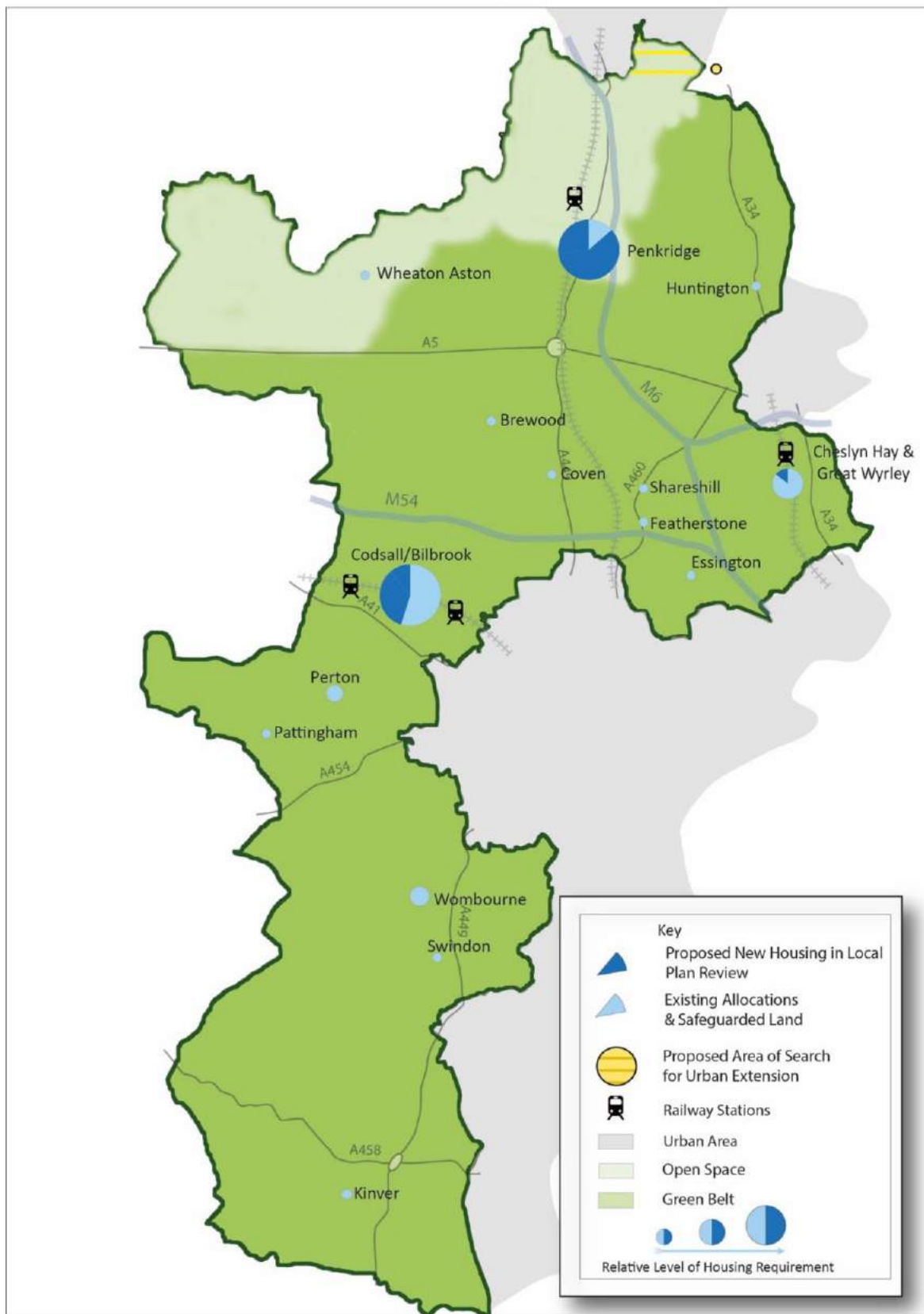


Figure F.10.1: Spatial Strategy Option I

F.10.2 SA Objective 1 – Climate Change Mitigation

F.10.2.1 The proposed development of around 4,600 new dwellings across the Plan area under this spatial option could potentially result in the loss of greenfield land and vegetation cover which have carbon storage capabilities. It would also be expected to result in an increase in carbon emissions due to the construction and occupation of development, including increased emissions from domestic and transport sources. Overall, a major negative impact on climate change mitigation is identified.

F.10.3 SA Objective 2 – Climate Change Adaptation

F.10.3.1 The north east and west of Penkridge and the north west and north east of Bilbrook/Codsall are located within Flood Zone 2 and 3. Over 2,500 dwellings are proposed within Penkridge and Bilbrook/Codsall, therefore, Spatial Option I could potentially locate some new development within or in proximity to Flood Zones 2 or 3. The proposed development could potentially locate residents in areas at risk of flooding and reduce the flood storage capacity in the area.

F.10.3.2 As Spatial Option I directs development to safeguarded land and Open Countryside sites, although there would only be limited Green Belt release adjacent to the Tier 1 settlements, it is nonetheless likely that a large proportion of development would be located on previously undeveloped land. As Spatial Option I directs development to safeguarded land and Open Countryside sites, although there would be very limited Green Belt release, it is nonetheless likely that the majority of development would be located on previously undeveloped land. Development would be likely to result in a net loss of vegetation cover and permeable soils, which help to attenuate flood risk, and therefore, could potentially result in the exacerbation of flood risk across many of these locations. This could potentially result in detrimental impacts in regard to human health and safety.

F.10.3.3 As it cannot be ruled out that development proposals under this option would not be located within Flood Zone 3 or on land identified at high risk of surface water flooding, a major negative impact is identified.

F.10.4 SA Objective 3 – Biodiversity and Geodiversity

F.10.4.1 Potential adverse impacts on Habitats sites following the development proposed in the LPR will be considered in the HRA. Some development proposals could potentially increase threats and pressures which could result in detrimental impacts on these sites. For example, development located to the north east of the Plan area may lie within 15km of Cannock Chase SAC where adverse effects as a result of increased recreational pressure would require mitigation.

F.10.4.2 Cannock Extension Canal SSSI and Stowe Pool and Walk Mill Clay Pit SSSI are located in close proximity to Cheslyn Hay/Great Wyrley. Motte Meadows SSSI is located in close proximity to Wheaton Ashton, and Kinver Edge SSSI is located adjacent to the Kinver settlement boundary. The south of Stafford urban extension is likely to be located in close proximity to Cannock Chase SSSI.

- F.10.4.3 Wyrley & Essington Canal LNR is located to the south west of Cheslyn Hay/ Great Wyrley. The south of Stafford urban extension could potentially be located in close proximity to Brocton LNR. The north of Wombourne is adjacent to stands of ancient woodland.
- F.10.4.4 Although Spatial Option I would be unlikely to result in the direct loss of designated biodiversity sites, a number of European, national and locally designated sites are located in close proximity to some of the identified locations for proposed for development. The proposed development at Penkridge, Huntington, Cheslyn Hay/Great Wyrley, Wheaton Ashton, Kinver, Wombourne and the proposed urban extension south of Stafford could potentially increase the risk of development-related threats and pressures to surrounding biodiversity sites. As a result, the development proposals under this option could potentially result in a minor negative impact on local biodiversity.

F.10.5 SA Objective 4 – Landscape and Townscape

- F.10.5.1 Cannock Chase AONB is located to the north east of South Staffordshire. The proposed development in and around Penkridge and Huntington, and the proposed urban extension south of Stafford, could potentially be adjacent or in close proximity to the AONB. Due to the proximity of these locations, the proposed development could potentially alter the setting of, and views experienced from, the AONB.
- F.10.5.2 It is expected that the proposed development at any of the locations identified within this spatial option would alter the view experienced by users of the local PRoW network and local residents to some extent.
- F.10.5.3 As development under this spatial option is likely to be located on previously undeveloped land (safeguarded land and Open Countryside sites), the proposed development would be expected to result in urban sprawl into the surrounding countryside. The proposed development in these locations could potentially be discordant with the local landscape character. Overall, a major negative impact on the local landscape cannot be ruled out.

F.10.6 SA Objective 5 – Pollution and Waste

- F.10.6.1 There is an extensive river network within South Staffordshire including the River Penk, the Staffordshire and Worcestershire Canal and Shropshire Union Canal. The proposed development at many of the locations identified under this spatial option would be in close proximity to a watercourse and could potentially increase the risk of water contamination.
- F.10.6.2 The north of Wombourne is located within the inner and outer zones of a groundwater SPZ (Zones I and II). Several other identified locations for growth under this option including Bilbrook/Codsall, Perton and Wombourne are located within the catchment of a groundwater SPZ (Zone III). The urban extension south of Stafford would also likely be located within Zone III. The proposed development could potentially increase the risk of groundwater contamination at these locations.
- F.10.6.3 The south east of Bilbrook/Codsall is located in close proximity to 'Wolverhampton' AQMA. The north east of Cheslyn Hay/Great Wyrley is located in close proximity to 'CCDC AQMA 2'. The construction and occupation of development at these locations would be likely to expose site end users to poor air quality and potentially exacerbate air pollution through the introduction of additional people and associated car movements.

- F.10.6.4 The A449 passes through Penkridge and the M6 is located to the east of the settlement. The A34 passes to the east of Great Wyrley and the M6 Toll is located to the north of Cheslyn Hay/Great Wyrley. The A449 passes to the east of Wombourne. New residents located in these locations could potentially be exposed to higher levels of air and noise pollution associated with these main roads. As a rural district, it is anticipated that new residents would have a high reliance on private car use which could potentially exacerbate air pollution issues in these areas with adverse impacts for local air quality and residents' health.
- F.10.6.5 Furthermore, the introduction of around 4,600 new dwellings would be likely to result in a significant increase in household waste produced.
- F.10.6.6 Overall, owing to the large scale of growth proposed, a major negative impact on pollution and waste is identified.

F.10.7 SA Objective 6 – Natural Resources

- F.10.7.1 The majority of South Staffordshire is located on Grade 2 and 3 ALC land. The south of Stafford urban extension could potentially be located on Grade 3 land. ALC Grades 1 and 2, and potentially Grade 3, comprise BMV agricultural land. Development proposed in these locations could potentially result in the loss of this agriculturally important soil resource. However, Bilbrook/Codsall and Cheslyn Hay/Great Wyrley are primarily located on land classed as 'urban' presenting some opportunities for efficient use of natural resources.
- F.10.7.2 Under Spatial Option I, development would be directed towards rural villages, safeguarded land and Open Countryside sites. Limited Green Belt release adjacent to Tier 1 settlements would be supported. Although it is possible this may include some brownfield land, the majority of growth will be directed towards the district's rural villages as well as land within the wider Open Countryside. As there are limited brownfield locations within South Staffordshire which are available for development, the majority of development under Spatial Option I would likely be on previously undeveloped land. Development proposals directed towards previously undeveloped locations could potentially result in a permanent and irreversible net loss of ecologically and agriculturally valuable soils caused by excavation, compaction, erosion, contamination and removal of vegetation cover. As a result, this spatial option would be likely to have a minor negative impact on soil resources within South Staffordshire.

F.10.8 SA Objective 7 – Housing

- F.10.8.1 Spatial Option I would deliver approximately 4,600 dwellings across the Plan area, which would meet the identified housing need of 4,086 and contribute around 640 homes to the wider HMA. As such, a major positive impact on housing provision is identified (SA Objective 7).

F.10.9 SA Objective 8 – Health and Wellbeing

- F.10.9.1 Given South Staffordshire is primarily rural district, and growth under this Spatial Option will include Open Countryside locations, it is anticipated that the majority of new residents

under this spatial option would have good access to a diverse range of natural habitats. In addition, all of the locations identified under this spatial option are in close proximity to a PRoW. Both of these factors will be likely to have physical and mental health benefits for local residents through encouraging outdoor exercise and recreation.

- F.10.9.2 There are no NHS hospitals with an A&E department located within South Staffordshire. All locations identified under this spatial option would be likely to situate new residents in a location with limited access to emergency healthcare. Development proposals located in Penkridge, Wheaton Ashton, Brewood, Cheslyn Hay/Great Wyrley, Bilbrook/Codsall, Essington, Featherstone, Perton, Pattingham, Wombourne and Kinver would be likely to situate new residents in close proximity to a GP surgery. Penkridge, Bilbrook/Codsall, Cheslyn Hay/Great Wyrley and Wombourne are located in close proximity to a leisure centre. New residents in these locations will be likely to have good access to these services.
- F.10.9.3 Overall, given that a proportion of residents would be likely to be located outside of the sustainable travel distance to healthcare facilities, a minor negative impact on health and wellbeing is identified.

F.10.10 SA Objective 9 – Cultural Heritage

- F.10.10.1 There are numerous Grade I, II* and II Listed Buildings located across South Staffordshire. The proposed development at many of the locations identified under this spatial option would likely be situated in close proximity to a Listed Building, with potential to affect their setting or significance.
- F.10.10.2 'Rodbaston Old Hall moated site and fishpond' SM is located approximately 500m south of Penkridge. Approximately 1,200 dwellings are proposed in and around Penkridge. As a result, development proposals under this spatial option could potentially alter the setting of this SM. Penkridge also coincides with 'Penkridge' Conservation Area, and 'Codsall Bilbrook and Oaken' Conservation Area is located to the west of Bilbrook/Codsall. Development proposals directed towards these two settlements could potentially have a minor negative impact on the setting of these Conservation Areas.
- F.10.10.3 Negative impacts on local heritage assets would be largely dependent on the layout and design of development proposed. By directing development to rural villages and the Open Countryside, the development proposed under Spatial Option I will likely be situated on previously undeveloped land. Due to the potential close proximity of the identified locations under Spatial Option I to local heritage assets, a minor negative impact cannot be ruled out.

F.10.11 SA Objective 10 – Transport and Accessibility

- F.10.11.1 There are four railway stations located within South Staffordshire. Penkridge is served by Penkridge Station, Bilbrook/Codsall are served by Bilbrook Station and Codsall Station, and Cheslyn Hay/Great Wyrley are served by Landywood Station. All other locations identified for future development under Spatial Option I could potentially located site end users in areas with limited access to rail services.

- F.10.11.2 By directing a higher proportion of development to the Tier 1 and 2 settlements under this spatial option, it is likely that the majority of new residents would have good access to sustainable transport options. Large proportions of new residents would likely be inside the sustainable travel distance to a bus stop providing regular services to surrounding towns and villages.
- F.10.11.3 However, a small proportion of development under this spatial option would be located in more rural locations, which may include settlements linked by country roads and narrow lanes. These roads typically do not have footpaths or safe pedestrian access. As a result, some residents would not have safe pedestrian access to local services.
- F.10.11.4 Over 4,000 dwellings would be directed towards Tier 1 and 2 settlements under Spatial Option I. A large proportion of new residents in Tier 1 and 2 settlements will be likely to have sustainable access to bus and rail services and as such, would likely rely less heavily on private car use. Spatial Option I also supports development in the Green Belt adjacent to Tier 1 settlements giving first consideration to areas well-served by public transport. Overall, this spatial option has potential to achieve a major positive impact on transport and accessibility.

F.10.12 SA Objective 11 – Education

- F.10.12.1 All of the settlements identified for development under this spatial option will likely be situated in close proximity to a primary school.
- F.10.12.2 Secondary schools within South Staffordshire are primarily located in Tier 1 settlements. The proposed development in Penkridge, Bilbrook/Codsall, Wombourne and Kinver will be likely to provide new residents with good access to secondary education. Some secondary schools are also located at the urban boundary of Stafford, Cannock, Wolverhampton and Stourbridge. The proposed development at Brewood, Perton, Essington, Coven, Wheaton Aston, Huntington, Featherstone, Pattingham and Swindon would however be likely to situate new residents in locations with limited access to secondary education.
- F.10.12.3 Under this spatial option, over 3,000 dwellings will be directed towards Tier 1 settlements. New residents located in Penkridge and Bilbrook /Codsall will be likely to have excellent access to primary and secondary education. Therefore, an overall major positive impact on access to education is identified for Spatial Option I.

F.10.13 SA Objective 12 – Economy and Employment

- F.10.13.1 Penkridge, Cheslyn Hay/Great Wyrley, Featherstone and Bilbrook/Codsall have been identified as key employment areas within the district. The majority of residents within South Staffordshire currently commute to employment opportunities in Wolverhampton, Dudley, Walsall and Birmingham. Development proposals directed towards Penkridge, Bilbrook/Codsall and Cheslyn Hay/Great Wyrley will be likely to have good access to these out-of-district employment areas. Development proposals directed towards Essington, Featherstone, Shareshill, Coven and Brewood will be likely to have reasonable access to out-of-district employment areas.
- F.10.13.2 Overall, approximately 3,500 dwellings would be directed towards locations with good or reasonable sustainable access to employment opportunities either within the district or in

surrounding areas. As the majority of development would be located in areas with good or reasonable sustainable access to employment opportunities, Spatial Option I would be likely to have a minor positive impact on the local economy.

F.11 Conclusions

F.11.1 Overview of spatial options

F.11.1.1 The SA impact matrix for the nine spatial options assessed above have been brought together in **Table F.11.1**. These impacts reflect a 'pre-mitigation' scenario without consideration of mitigating policies within the LPR.

Table F.11.1: SA impact matrix of the nine spatial options assessed in this report

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

F.11.1.2 The text below summarises the likely impact expected following the adoption of each of the nine spatial options. The summary of impacts is presented by SA Objective.

F.11.2 SA Objective 1 – Climate Change Mitigation

F.11.2.1 The development of between 4,000-8,000 dwellings proposed under each of the options would be anticipated to increase carbon emissions across the Plan area significantly. The construction and occupation of homes requires carbon resources, which includes fuel to power construction vehicles and gas to heat homes. As a result, all of the options would be likely to have a major negative impact on climate change mitigation. The options which provide a lower quantum of growth would generally be expected to give rise to lesser adverse effects in this regard, meaning that Option H could be seen as the best performing option under SA Objective 1.

F.11.2.2 **Best performing – Option H.**

F.11.3 SA Objective 2 – Climate Change Adaptation

F.11.3.1 As the location of development is currently unknown, it is uncertain if development proposals would be situated in areas at risk of surface water or fluvial flooding. However, development proposals surrounding Penkridge, Bilbrook/Codsall, Cheslyn Hay/Great Wyrley, Wombourne, Brewood, Kinver, Perton, Wheaton Ashton, Sharesill, Coven and Swindon could potentially situate residents in areas at risk of flooding. This could lead to an adverse impact on the stability of local infrastructure and present health and safety risks. As all of the spatial options would locate development in some of these areas, a major negative impact cannot be ruled out at this stage of the assessment.

F.11.3.2 **Best performing – uncertain.**

F.11.4 SA Objective 3 – Biodiversity and Geodiversity

F.11.4.1 All spatial options would deliver a large quantum of new residential growth, with potential to increase the risk of development related threats and pressures on biodiversity assets via a range of pathways including water pollution, hydrological changes, air pollution and recreational pressure. All options could also put pressure on the wider ecological network through loss or fragmentation of habitats and corridors. Although the specific location and design of development is unknown, a minor negative impact on local biodiversity cannot be ruled out for all options.

F.11.4.2 **Best performing – uncertain.**

F.11.5 SA Objective 4 – Landscape and Townscape

F.11.5.1 Cannock Chase AONB is partially located within South Staffordshire to the north east of the Plan area. The proposed development within Huntington and Penkridge (all options) and the proposed urban extensions south of Stafford (Options A, B, F, G, H and I) and west of Cannock (Options E and F) could potentially be located adjacent to or in close proximity to the AONB. Development under all of the spatial options would include development outside of existing settlements including Open Countryside locations in varying proportions. This development has the potential to result in urban sprawl and increase the risk of coalescence between nearby settlements, as well as introduce new development into sensitive landscapes as identified in the Landscape Sensitivity Study⁵. Although the exact location and design of new development is uncertain, a major negative impact on the local landscape under all of the spatial options cannot be ruled out.

F.11.5.2 **Best performing – uncertain.**

F.11.6 SA Objective 5 – Pollution and Waste

F.11.6.1 Development proposed in close proximity to AQMAs and main roads could potentially expose new residents to higher levels of air and noise pollution having an adverse impact on human health. Development proposals in these areas would also be expected to exacerbate local air pollution, primarily due to the number of additional vehicles new

⁵ LUC (2019) South Staffordshire Landscape Sensitivity Assessment. Available at: <https://www.sstaffs.gov.uk/local-plan-review-evidence-base> [Date accessed: 14/11/23]

development would be likely to create. This would be likely to have adverse impacts on human health and the local ecosystem. In addition, there is an extensive river network across South Staffordshire and a large proportion of the district is located within a groundwater SPZ. Depending on its specific location and design, development could potentially result in the contamination of rivers, streams and groundwater sources. The occupation of at least 4,000 dwellings would be anticipated to result in a significant increase of household waste generation throughout the Plan area.

F.11.6.2 Overall, it would be expected that development proposed under all of the options would be likely to result in a major negative impact on pollution and waste. The options which provide a lower quantum of growth would generally be expected to give rise to lesser adverse effects in this regard, meaning that Option H could be seen as the best performing option under SA Objective 5.

F.11.6.3 **Best performing – Option H.**

F.11.7 SA Objective 6 – Natural Resources

F.11.7.1 The majority of South Staffordshire is located on Grade 2 and 3 ALC land. The south of Stafford urban extension could potentially be located on Grade 3 land. ALC Grades 1 and 2, and potentially Grade 3, comprise BMV agricultural land. Only small proportions of the district comprise Grade 4, 'non-agricultural' or 'urban' land. As a large quantity of development would be likely to be located on previously undeveloped ALC Grade 2 and 3 land, the proposed development under all of the spatial options would result in the permanent loss of agriculturally and ecologically important soil. Therefore, a minor negative impact would be expected under all of the spatial options.

F.11.7.2 **Best performing – uncertain.**

F.11.8 SA Objective 7 – Housing

F.11.8.1 All spatial options would make a significant and positive contribution to housing provision within South Staffordshire. All options would meet the identified housing need for the district of 4,086 dwellings. As Spatial Option H proposes the least number of dwellings, this option would be expected to have a minor positive impact, whereas all other options would be expected to result in a major positive impact given they would contribute towards unmet needs of the wider HMA in addition to meeting South Staffordshire's own needs.

F.11.8.2 Spatial Option D seeks to maximise housing delivery in locations identified in the GBHMA Strategic Growth Study and would be expected to deliver the highest total number of dwellings, and as such, this option could be seen as the best performing option for SA Objective 7. Although, Spatial Option E would deliver a similar level of growth but directed towards settlements with the greatest housing needs which could potentially lead to further benefits in terms of the specific distribution of homes, as well as the type/tenure of homes, to address local needs.

F.11.8.3 **Best performing – Option D or E.**

F.11.9 SA Objective 8 – Health and Wellbeing

F.11.9.1 There are no NHS hospitals with an A&E department located within South Staffordshire. The nearest hospitals are County Hospital in Stafford, New Cross Hospital in Wolverhampton and Russell’s Hall Hospital in Dudley. The majority of new development would be located outside the sustainable travel distance to one of these emergency health centres⁶. Some new residents would also be likely to be situated outside the sustainable travel distance to a GP surgery or leisure centre under all options, in varying proportions. In addition, many of the identified locations under these spatial options are situated in close proximity to main roads or AQMAs, which would be expected to expose site end users to higher levels of local air pollution. However, as a rural district, it is anticipated that a number of new residents under this spatial option would have excellent access to a diverse range of natural habitats. Overall, a minor negative impact on health and wellbeing is identified for all spatial options.

F.11.9.2 **Best performing – uncertain.**

F.11.10 SA Objective 9 – Cultural Heritage

F.11.10.1 There are numerous heritage assets located across the Plan area, including Registered Parks and Gardens, Conservation Areas, Scheduled Monuments and Listed Buildings. Development proposed at any of the settlements identified under the nine spatial options would be likely to be located in close proximity to heritage assets. At this stage of assessment, the exact location of the proposed development is unknown and therefore, it is uncertain if the proposed development would impact surrounding heritage assets. Due to the potential close proximity of the development locations identified under these spatial options to heritage assets, a minor negative impact on the local historic environmental cannot be ruled out.

F.11.10.2 **Best performing – uncertain.**

F.11.11 SA Objective 10 – Transport and Accessibility

F.11.11.1 Development proposals located in Penkridge, Bilbrook/ Codsall and Cheslyn Hay/ Great Wyrley would be likely to locate new residents in an area with good access to rail services to travel around the district and into the surrounding towns and cities, as these settlements contain railway stations. Many new residents located in Tier 1 and 2 settlements would also be expected to have good access to the local bus network. It is assumed that new bus stops and services would be provided within proposed urban extensions. As a result, Spatial Options D, E, F, G and H are identified as having a minor positive impact on transport and accessibility whereas Spatial Options A, B and C could potentially have a minor negative impact on transport and accessibility due to their more rural location. Spatial Option I is identified to have a potentially major positive impact on transport and accessibility, because this option would support development in Green Belt locations only where these are well-served by public transport.

F.11.11.2 **Best performing – Option I.**

⁶ Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010

F.11.12 SA Objective 11 – Education

- F.11.12.1 There are a good range of primary and secondary schools located within South Staffordshire. All of the locations identified for development under the spatial options would be expected to ensure residents have relatively good sustainable access to a primary school. Secondary schools are primarily located within the Tier 1 settlements, Penkridge, Bilbrook/Codsall, Cheslyn Hay/Great Wyrley, Wombourne and Kinver. As all options would direct some new residents to these locations, a positive impact in regard to access to education would be expected. However, Spatial Option A would be likely to situate fewer residents in areas with good access to both primary and secondary education, in particular due to the proposed development of a new settlement in an uncertain location, and therefore a minor positive impact is identified for this option, compared to the other options where a major positive impact has been identified.
- F.11.12.2 Spatial Option H could be identified as the best performing for SA Objective 11 since this option would allow for the use of Green Belt land only where necessary to facilitate new education infrastructure, whilst delivering the smallest quantum of growth and likely placing the least pressure on the capacity of schools.
- F.11.12.3 **Best performing – Option H.**

F.11.13 SA Objective 12 – Economy and Employment

- F.11.13.1 It is noted that the majority of residents living within South Staffordshire commute to out of the district to employment opportunities within Wolverhampton, Dudley, Stafford and Birmingham. The towns of Penkridge, Bilbrook/Codsall and Cheslyn Hay/Great Wyrley have railway stations which would be expected to provide residents with sustainable travel options to out-of-district employment opportunities. The proposed urban extensions (Options A, B, D, E, F, G, H and I) would also be expected to ensure new residents have good access to these areas. Residents in more rural locations could potentially have more restricted access to sustainable transport options to employment sites. Spatial Options C, D, E, F, G, H and I direct over half of the development proposals in locations with good or reasonable sustainable access to the employment opportunities and as such, are identified as having a minor positive impact on the local economy. As less than half of the proposed development under Spatial Options A and B would be directed towards locations with good or reasonable sustainable access to employment opportunities, a minor negative impact is identified for these two options.
- F.11.13.2 In addition, Spatial Option G proposes development at urban extension for employment-led growth at ROF Featherstone. This would be expected to help facilitate the delivery of key infrastructure to support strategic employment allocations at ROF Featherstone, assisting in increasing employment land across the district. This would also be expected to facilitate good access to local employment opportunities and have benefits to the local economy. A major positive impact would therefore be expected under Spatial Option G, and this option is identified as the best performing for SA Objective 12.
- F.11.13.3 **Best performing – Option G.**

F.11.14 Best performing option

- F.11.14.1 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. The identified negative impacts are likely to be in regard to these options directing a higher proportion of new residents to more rural locations in South Staffordshire with limited access to essential services, such as education, employment and health centres.
- F.11.14.2 Although Spatial Options H and I also direct high proportions of new residents to more rural locations, these two policies specifically focus on delivering growth in suitable locations that can meet critical infrastructure needs and deliver more growth in close proximity to Tier 1 and 2 settlements.
- F.11.14.3 It is difficult to differentiate between the sustainability performance of Spatial Options D, E, F, G, H and I, as the proposed development under all of these options would be likely to result in similar sustainability impacts overall. Likely positive impacts of these spatial options are due to the provision of housing beyond the identified need in locations where the majority of new residents would be expected to have good access to education, employment opportunities and sustainable transport options, including rail and bus services.
- F.11.14.4 It is difficult to determine an overall best performing spatial option, as the performance of each option varies depending on the SA Objective in question. Generally, options which perform better against meeting development needs would also put the most pressure on environmental resources and social facilities.
- F.11.14.5 On the whole, Spatial Option H has been identified as the best performing option against the most SA Objectives (Objectives 1 – climate change mitigation, 5 – pollution and waste, and 11 – education), as it would potentially give rise to the least potential for adverse effects given it proposes the lowest quantum of growth, and would provide opportunities for new education infrastructure. However, Option H would not seek to meet any of the unmet housing need of the wider HMA, and so has been identified to perform worse than the other options with regard to SA Objective 7 (housing provision). As such, Option I could be identified as the preferable option overall because it would seek to positively prepare the Plan, making a contribution towards the unmet requirements of the wider HMA, whilst proposing a significantly lower quantum of growth, and lower potential for adverse environmental effects, than Options A, B, C, D, E, F or G.

Appendix G: New and Amended Reasonable Alternative Site Assessments

Appendix G Contents

G.1	Introduction	G1
G.2	Bilbrook and Codsall	G3
G.3	Cannock.....	G9
G.4	Coven	G14
G.5	Essington	G20
G.6	Featherstone.....	G26
G.7	Pattingham.....	G31
G.8	Sedgley	G36
G.9	Employment Sites.....	G41

Tables

Table G.1.1: Reasonable alternative sites assessed within this report	G2
--	----

Figures

Figure G.2.1: Location of new Site 500 within Bilbrook and Codsall.....	G3
Figure G.3.1: Location of amended Site 624 within Cannock.....	G9
Figure G.4.1: Location of amended Site 085 within Coven	G14
Figure G.5.1: Location of amended Sites 163 and 393 within Essington.....	G20
Figure G.6.1: Location of new Site 743 within Featherstone	G26
Figure G.7.1: Location of amended Site 253 within Pattingham	G31
Figure G.8.1: Location of amended Site 567 within Sedgley.....	G36
Figure G.9.1: Location of amended employment Site E30.....	G41
Figure G.9.2: Location of amended employment Site E43.....	G42
Figure G.9.3: Location of amended employment Site E58a	G43

G.1 Introduction

G.1.1 Overview

G.1.1.1 The identification, description and evaluation of reasonable alternative development sites has been taking place throughout the plan making process at different stages. This is discussed further in **Chapter 5** of the main Regulation 19 SA Report (**Volume 2**).

G.1.1.2 A total of 358 reasonable alternative sites have been considered throughout the plan making process and evaluated through the accompanying SA stages, as follows:

- The Regulation 18 (III) SA Report set out the appraisal of 317 reasonable alternative sites identified by SSDC within the Preferred Options consultation paper, comprising:
 - 259 residential-led sites (grouped into 28 clusters¹);
 - 28 employment-led sites; and
 - 30 Gypsy, Traveller and Travelling Showpeople (GTTS) sites.
- Within the Regulation 19 SA (2022), a further 58 reasonable alternative sites were assessed, including 39 new sites and 19 amendments to sites originally assessed in the Regulation 18 (III) SA.
- This updated Regulation 19 SA Report includes an assessment of 11 further reasonable alternative sites, identified by the SSDC since the previous stage. 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.

G.1.1.3 This appendix provides an assessment of the 11 new/amended reasonable alternative sites, within eight clusters, as set out in **Table G.1.1**.

¹ 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.

G.1.1.4 All reasonable alternative sites have been assessed in the same way in the SA process against the methodology as presented in **Chapter 4**, alongside the topic-specific methodologies and assumptions presented in **Appendix D**. An overview of the assessment findings for all 358 reasonable alternative sites, pre- and post-mitigation, is presented in **Appendix H**.

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

Cluster	Site ref	Site address	Site use	Area (ha)	Site status (since R19 2022)
Billbrook	500	Smallholding Barnhurst Lane	Residential-led	8.67	New
Cannock	624	Land north of Chase Gate Public House, Wolverhampton Road	Residential-led	1.49	Amended
Coven	085	Land at Grange Farm	Residential-led	9.40	Amended
Essington	163	Land off Sneyd Lane	Residential-led	17.57	Amended
Essington	393	Land rear 3 – 65 Upper Sneyd Road	Residential-led	1.77	Amended
Featherstone	743	Land off East Road	Residential-led	2.49	New
Pattingham	253	Land off Westbeech Road	Residential-led	4.35	Amended
Sedgley	567	Green Hill Farm, Sandyfields	Residential-led	5.87	Amended
Employment Sites	E30	Land south of J13, M6	Employment-led	17.80	Amended
Employment Sites	E43	Land at J11 M6, Hilton Park	Employment-led	99.90	Amended
Employment Sites	E58a	Land at Gailey Lea Farm	Employment-led	72.10	Amended

G.2 Bilbrook and Codsall

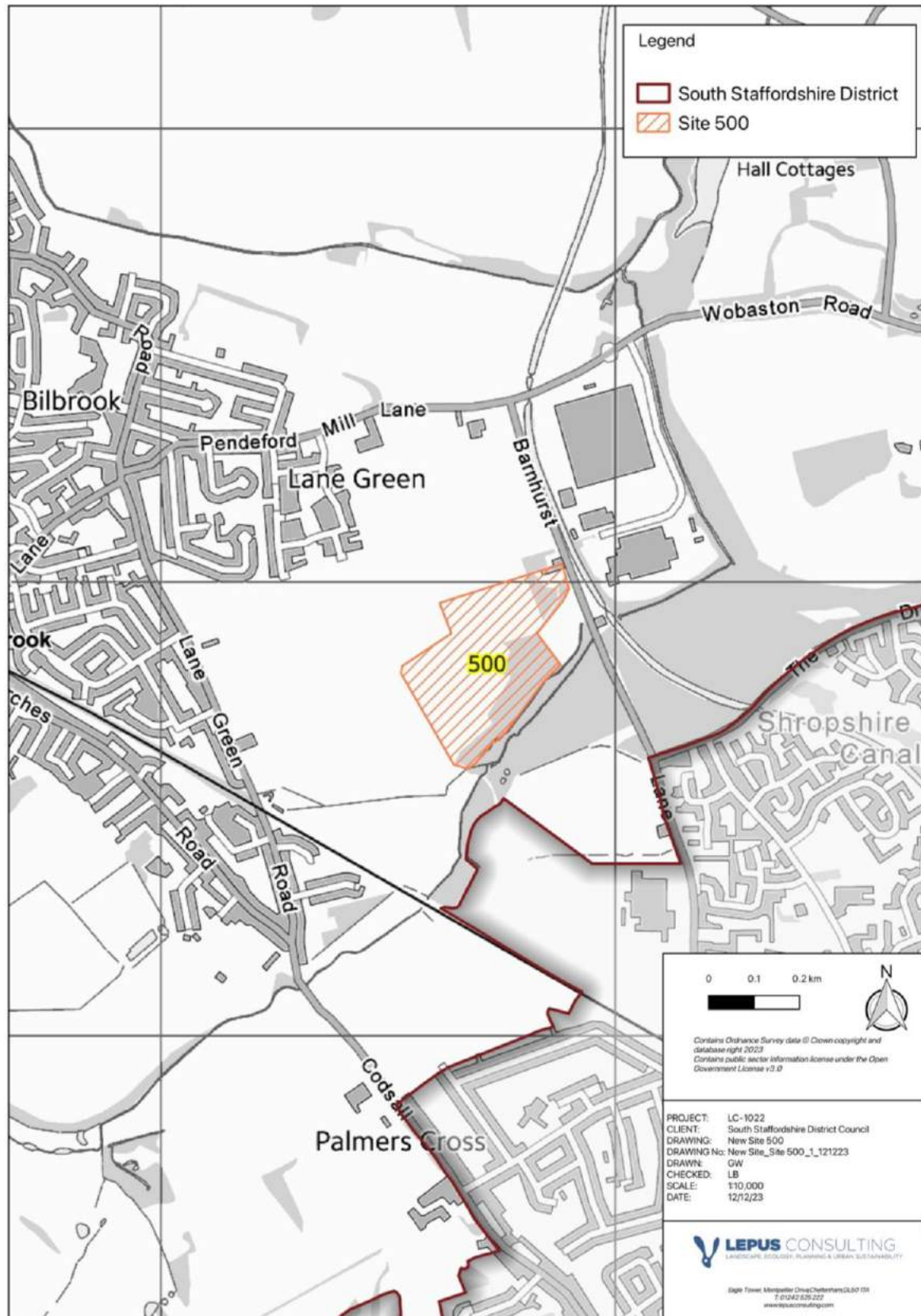


Figure G.2.1: Location of new Site 500 within Bilbrook and Codsall

Bilbrook and Codsall Cluster

This cluster is located to the east of the South Staffordshire District. See the Bilbrook and Codsall cluster map (**Figure G.2.1**) for the location of the new site.

Site reference	Site address	Site use	Area (ha)
500	Smallholding Barnhurst Lane	Residential-led	8.67

	1	2	3	4	5	6	7	8	9	10	11	12
Site 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
500	+/-	--	+/-	--	-	-	+	-	-	-	-	-

G.2.1 SA Objective 1 – Climate Change Mitigation

G.2.1.1 See **Appendix D**.

G.2.2 SA Objective 2 – Climate Change Adaptation

G.2.2.1 **Fluvial Flooding:** A proportion of Site 500 in the south east is located within Flood Zone 2 and 3. A major negative impact would be expected, as the proposed development at this location could potentially locate some site end users within areas at risk of fluvial flooding.

G.2.2.2 **Surface Water:** A proportion of Site 500 coincides with areas of low and medium surface water flood risk. The proposed development at this site would be expected to have a minor negative impact on surface water flood risk, as development would be likely to locate site end users in areas at risk of flooding, as well as exacerbate surface water flood risk in surrounding locations.

G.2.3 SA Objective 3 – Biodiversity & Geodiversity

G.2.3.1 **Habitats Sites:** At the time of writing the potential impact of development on other Habitats sites is uncertain. The emerging HRA will provide more detailed analysis of likely impacts and identification of impact pathways beyond those considered in the SA.

G.2.4 SA Objective 4 – Landscape & Townscape

G.2.4.1 **Green Belt Harm:** The release of Green Belt land at Site 500 is considered by the Green Belt Study to result in 'very high' levels of harm to the purposes of the Green Belt. The development of this site could potentially have a major negative impact.

- G.2.4.2 **Landscape Sensitivity:** Site 500 is considered by the Landscape Sensitivity Study to be within an area of 'moderate' landscape sensitivity. Development at this site has the potential to have a minor negative impact.
- G.2.4.3 **Landscape Character:** Site 500 is located within RCA 'Staffordshire Plain' and the LCT 'Ancient Clay Farmlands'. The characteristic landscape features of this LCT include "*mature hedgerow oaks and strong hedgerow patterns ... small broadleaved and conifer woodlands; well treed stream and canal corridors ... numerous farmsteads, cottages, villages and hamlets of traditional red brick; a gently rolling landform with stronger slopes in places; dispersed settlement pattern*". Site 500 comprises hedged fields and woodland, and therefore, the proposed development at this site could potentially be discordant with the key characteristics of this LCT. Therefore, a minor negative impact on the local landscape character is identified.
- G.2.4.4 **Views for Local Residents:** The proposed development at Site 500 could potentially alter the views experienced by local residents, including those on Lane Green Road. Therefore, a minor negative impact on the local landscape is identified.

G.2.5 SA Objective 5 – Pollution & Waste

- G.2.5.1 **AQMA:** Site 500 is located partially within 200m of Wolverhampton AQMA. The proposed development at the site could potentially locate some site end users in areas of existing poor air quality and therefore, a minor negative impact on local air quality is identified.
- G.2.5.2 **Groundwater SPZ:** Site 500 is located entirely within the catchment (Zone III) of a groundwater SPZ. The proposed development at this site could potentially increase the risk of groundwater contamination within this SPZ, and therefore, result in a minor negative impact on local groundwater resources.
- G.2.5.3 **Watercourse:** Site 500 is located approximately 15m from the River Penk to the south east of the site. The proposed development at this site could potentially increase the risk of contamination of the watercourse, and therefore, a minor negative impact is identified.

G.2.6 SA Objective 6 – Natural Resources

- G.2.6.1 **Previously Developed Land:** Site 500 comprises previously undeveloped land. The proposed development at this site would be likely to result in a minor negative impact on natural resources, due to the loss of previously undeveloped land. This negative impact would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.
- G.2.6.2 **ALC:** Site 500 is primarily situated on ALC Grade 2 land, and partially located on ALC Grade 3 land. ALC Grade 2, and potentially Grade 3, represent some of South Staffordshire's BMV land. Therefore, a minor negative impact would be expected as a result of the proposed development at this site, due to the loss of this agriculturally important natural resource.

G.2.7 SA Objective 7 – Housing

G.2.7.1 See **Appendix D**.

G.2.8 SA Objective 8 – Health & Wellbeing

G.2.8.1 **NHS Hospital:** The closest NHS hospital with an A&E department is New Cross Hospital, located approximately 5.4km south east of Site 500. The proposed development at this site could potentially restrict the access of site end users to this essential health facility. Therefore, a minor negative impact is identified.

G.2.8.2 **GP Surgery:** The closest GP surgeries include Bilbrook Medical Centre and Russell House Surgery, located north west of Site 500, outside the sustainable target distance. Therefore, the proposed development at this site could potentially have a minor negative impact on the access of site end users to these healthcare facilities.

G.2.8.3 **Leisure Centre:** The closest leisure facility is Codsall Leisure Centre, located approximately 1.4km north of Site 500. The majority of Site 500 is located outside of the sustainable target distance to a leisure centre, and therefore the proposed development at this site could potentially have a minor negative impact on the access of site end users to these leisure facilities.

G.2.8.4 **AQMA:** Site 500 is located partially within 200m from Wolverhampton AQMA, and therefore, a minor negative impact would be expected for the health and wellbeing of site end users at this site.

G.2.8.5 **Main Road:** Site 500 is located entirely over 200m from the nearest main road. Therefore, a minor positive impact would be expected for the health and wellbeing of site end users at this site.

G.2.8.6 **Access to Public Greenspace:** Site 500 is located within 600m of a public greenspace. Therefore, a minor positive impact is identified at this site, as the proposed development would be likely to provide site end users with good access to outdoor space and a diverse range of natural habitats, which is known to have physical and mental health benefits.

G.2.8.7 **PRoW/Cycle Network:** Site 500 is located within the sustainable target distance to the cycle network and approximately half of the site is located within the sustainable target distance to the PRoW network. The proposed development at this site would be likely to provide site end users with good pedestrian and cycle access and encourage physical activity, and therefore, have a minor positive impact on the health and wellbeing of local residents.

G.2.9 SA Objective 9 – Cultural Heritage

G.2.9.1 **Grade II Listed Building:** Site 500 is located approximately 135m from the Grade II Listed Building 'Shropshire Union Canal Milepost'. The proposed development at the site could potentially alter the setting of the this Listed Building and the wider canal and therefore a minor negative impact is identified.

G.2.9.2 **Conservation Area:** Site 500 comprises previously undeveloped land and is located approximately 30m from the 'Shropshire Union Canal' Conservation Area at its closest point. The proposed development at the site could potentially alter the setting of this Conservation Area and, as a result, have a minor negative impact on the historic environment.

G.2.9.3 **Historic Character:** Site 500 is partially located within an area of 'medium' historic value. The proposed development at this site could potentially have a minor negative impact on historic character.

G.2.9.4 **Archaeology:** Site 500 coincides with the archaeological feature 'Bilbrook Brickworks' to the southwest of the site. The proposed development at this site could potentially alter the setting or significance of this archaeological feature, and as such, have a minor negative impact on the historic environment.

G.2.10 SA Objective 10 – Transport & Accessibility

G.2.10.1 **Bus Stop:** Site 500 is located outside the sustainable target distance to bus stops providing regular services. The proposed development at this site would be likely to have a minor negative impact on site end users' access to bus services.

G.2.10.2 **Railway Station:** The nearest railway station to Site 500 is the Bilbrook Station, located to the west of the site. Site 500 is located entirely within the sustainable target distance to this railway station, and therefore, the proposed development at this site would be expected to have a minor positive impact on site end users' access to rail services.

G.2.10.3 **Pedestrian Access:** Site 500 is well connected to the existing footpath network. The proposed development at this site would be expected to have a minor positive impact on site end users' opportunities to travel by foot.

G.2.10.4 **Road Access:** Site 500 is well connected to the existing road network. The proposed development at this site would therefore be expected to provide site end users with good access to existing roads, resulting in a minor positive impact on accessibility.

G.2.10.5 **Local Services:** The nearest convenience stores include the Premier convenience store, located approximately 850m south of the site, and Budgens and One Stop in Bilbrook approximately 700m to the north west. Site 500 is located outside the sustainable target distance to these convenience stores. Therefore, the proposed development at this site would be expected to have a minor negative impact on site end users' access to local services.

G.2.11 SA Objective 11 – Education

G.2.11.1 **Primary School:** Bilbrook is served by several primary schools, including Lane Green First School, St Christopher's Catholic Primary School and Birches First School. The majority of Site 500 is located outside the sustainable target distance to Birches First School, and therefore, the proposed development at this site could potentially have a minor negative impact on the access of new residents to these educational facilities.

G.2.11.2 **Secondary School:** Bilbrook is served by one secondary school, Codsall Community High School. Site 500 is partially located within the sustainable target distance to Codsall Community High School, and additionally within the sustainable distance of Aldersley High School within Wolverhampton, and therefore, the proposed development at this site would be expected to have a minor positive impact on the access of new residents to these educational facilities.

G.2.12 SA Objective 12 – Economy

G.2.12.1 **Access to Employment:** Site 500 is located adjacent to areas with 'poor' and 'medium' sustainable access to employment opportunities, and therefore, the proposed development at this site would be expected to have a minor negative impact on site end users' access to employment.

G.3 Cannock

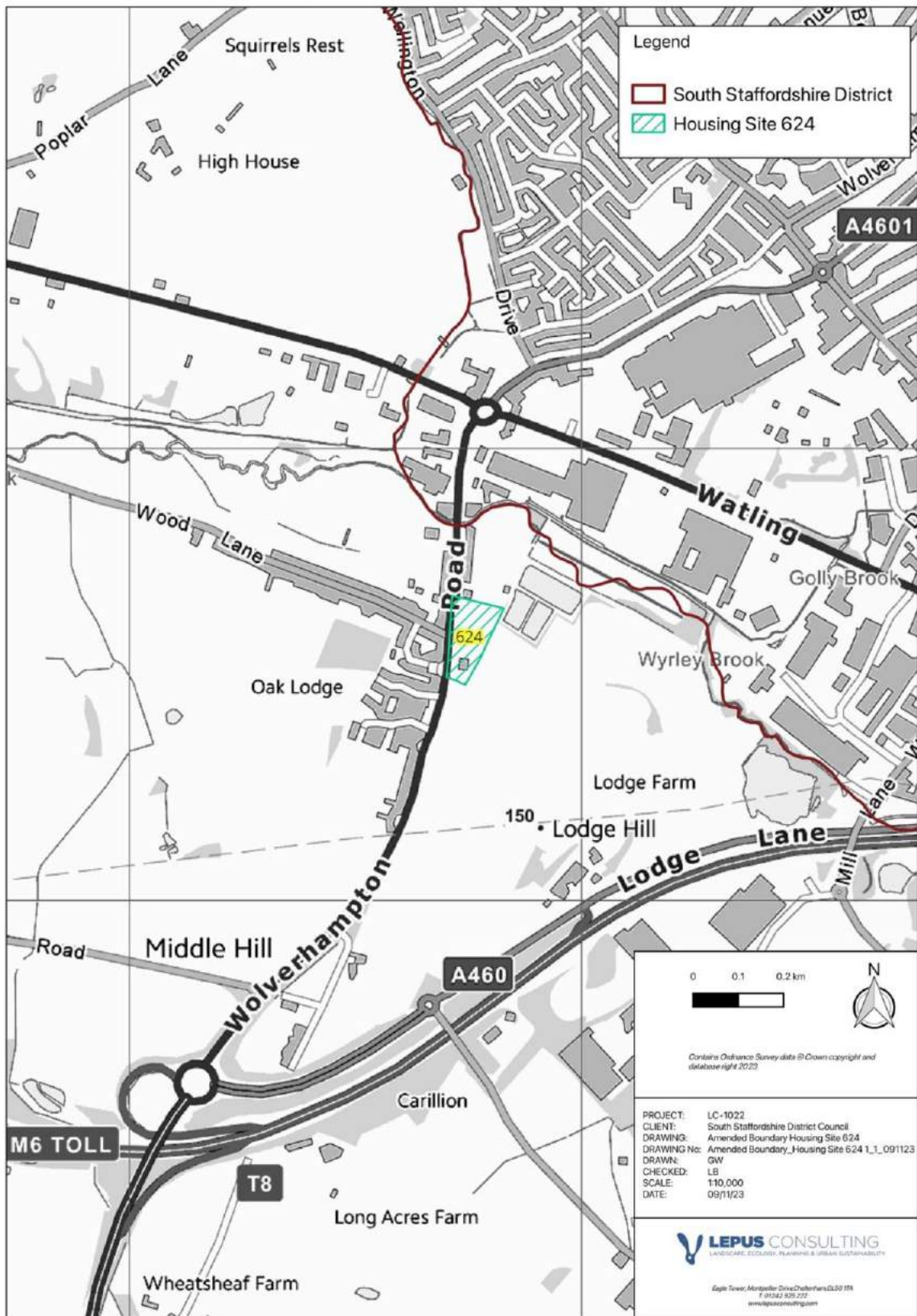


Figure G.3.1: Location of amended Site 624 within Cannock

Cannock Cluster

This cluster is located to the east of the South Staffordshire District. See the Cannock cluster map (**Figure G.3.1**) for the location of the amended site.

Site reference	Site address	Site use	Area (ha)
624	Land north of Chase Gate Public House, Wolverhampton Road	Residential-led	1.49

	1	2	3	4	5	6	7	8	9	10	11	12
Site 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
624	+/-	+	-	++	-	-	+	-	-	-	--	-

G.3.1 SA Objective 1 – Climate Change Mitigation

G.3.1.1 See **Appendix D**.

G.3.2 SA Objective 2 – Climate Change Adaptation

G.3.2.1 **Fluvial Flooding:** Site 624 is located wholly within Flood Zone 1. A minor positive impact would be expected, as the proposed development at this location would be likely to locate site end users away from areas at risk of fluvial flooding.

G.3.3 SA Objective 3 – Biodiversity & Geodiversity

G.3.3.1 **Habitats Sites:** Site 624 is located within 6km south of 'Cannock Chase' SAC. A minor negative impact would be expected as a result of the proposed development at this site, due to the increased risk of development-related threats and pressures on this Habitats site.

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

G.3.3.3 **SSSI IRZ:** Site 624 is located approximately 650m northwest of 'Stowe Pool and Walk Mill Clay Pit' SSSI, within an IRZ which indicates that "Residential development of 50 units or more" should be consulted on with Natural England. Therefore, the proposed development at this site could potentially have a minor negative impact on the features for which nearby SSSIs have been designated.

G.3.4 SA Objective 4 – Landscape & Townscape

- G.3.4.1 **Green Belt Harm:** The release of Green Belt land at Site 624 is considered by the Green Belt Study to result in 'moderate-high' levels of harm to the purposes of the Green Belt. The development of this site could potentially have a major negative impact.
- G.3.4.2 **Landscape Sensitivity:** Site 624 is considered by the Landscape Sensitivity Study to be within an area of 'moderate' landscape sensitivity. Development at this site has the potential to have a minor negative impact.
- G.3.4.3 **Landscape Character:** Site 624 is located within RCA 'Cannock Chase and Cankwood' and the LCT 'Settled Plateau Farmland Slopes'. The characteristic landscape features of this LCT are "*hamlets and villages; irregular fields; narrow winding lanes and hedge banks; hedgerow oaks; irregular pattern of mixed hedges; parklands with estate woodlands; red brick farm buildings; rolling landform; [and] mixed arable and pasture farming*". Site 624 comprises arable land with hedgerows, and therefore, the proposed development at this site could potentially be discordant with the key characteristics of this LCT. Therefore, a minor negative impact on the local landscape character is identified.
- G.3.4.4 **Views from the PRoW Network:** Site 624 is adjacent to a PRoW in the south of the site. The proposed development at this site could potentially alter the views experienced by users of this footpath. As a result, a minor negative impact on the local landscape is identified.
- G.3.4.5 **Views for Local Residents:** The proposed development at Site 624 could potentially alter the views experienced by local residents, including those on Wolverhampton Road and Wood Lane. Therefore, a minor negative impact on the local landscape is identified.

G.3.5 SA Objective 5 – Pollution & Waste

- G.3.5.1 **Main Road:** Site 624 is adjacent to the A4601. The proposed development at this site could potentially expose some site end users to higher levels of transport associated air and noise pollution. Traffic using the A4601 would be expected to have a minor negative impact on air quality and noise at this site.
- G.3.5.2 **Watercourse:** A proportion of Site 624 is located within 200m of Saredon Brook. The proposed development at this site could potentially increase the risk of contamination of the watercourse, and therefore, a minor negative impact is identified.

G.3.6 SA Objective 6 – Natural Resources

- G.3.6.1 **Previously Developed Land:** Site 624 comprises previously undeveloped land. The proposed development at this site would be likely to result in a minor negative impact on natural resources, due to the loss of previously undeveloped land. This negative impact would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.

G.3.7 SA Objective 7 – Housing

- G.3.7.1 See **Appendix D**.

G.3.8 SA Objective 8 – Health & Wellbeing

- G.3.8.1 **NHS Hospital:** The closest NHS hospital with an A&E department is New Cross Hospital, located approximately 8.8km south west of Site 624. The proposed development at this site could potentially restrict the access of site end users to this essential health facility. Therefore, a minor negative impact is identified.
- G.3.8.2 **GP Surgery:** The closest GP surgeries include Alderwood Medical Practice to the north east in Cannock and The Nile Practice and High Street Surgery located to the south east in Great Wyrley. Site 624 is located outside the sustainable target distance to a GP surgery and therefore the proposed development at this site could potentially have a minor negative impact on the access of site end users to these healthcare facilities.
- G.3.8.3 **Leisure Centre:** The closest leisure facility is Cheslyn Hay Leisure Centre, located over 1.5km from Site 624. The majority of Site 624 is located outside of the sustainable target distance to a leisure centre and therefore the proposed development at this site would be expected to have a minor negative impact on the access of site end users to these leisure facilities.
- G.3.8.4 **AQMA:** Site 624 is located over 200m from the nearest AQMA, and therefore, a minor positive impact would be expected for the health and wellbeing of site end users at this site.
- G.3.8.5 **Main Road:** Site 624 is adjacent to the A4601. The proposed development at this site could potentially expose site end users to higher levels of traffic associated emissions, which would be likely to have a minor negative impact on the health of site end users.
- G.3.8.6 **Access to Public Greenspace:** Site 624 is located within 600m of a public greenspace. Therefore, a minor positive impact is identified at this site, as the proposed development would be likely to provide site end users with good access to outdoor space and a diverse range of natural habitats, which is known to have physical and mental health benefits.
- G.3.8.7 **PRoW/Cycle Network:** Site 624 is located within the sustainable target distance to the PRoW network. The proposed development at this site would be likely to provide site end users with good pedestrian access and encourage physical activity, and therefore, have a minor positive impact on the health and wellbeing of local residents.

G.3.9 SA Objective 9 – Cultural Heritage

- G.3.9.1 **Archaeology:** Site 624 is adjacent to the archaeological feature 'The Streetway and Wordsley Green Turnpike Road'. The proposed development at this site could potentially alter the significance of these archaeological features, and as such, have a minor negative impact on the historic environment.

G.3.10 SA Objective 10 – Transport & Accessibility

- G.3.10.1 **Bus Stop:** Site 624 is located outside the sustainable target distance to bus stops providing regular services. The proposed development at this site would be likely to have a minor negative impact on site end users' access to bus services.

- G.3.10.2 **Railway Station:** The closest railway station is Cannock Railway Station, located 2.2km southwest of the site. Site 624 is located entirely outside the sustainable target distance to this railway station, and therefore, the proposed development at this site would be expected to have a minor negative impact on site end users' access to rail services.
- G.3.10.3 **Pedestrian Access:** Site 624 is well connected to the existing footpath network. The proposed development at this site would be expected to have a minor positive impact on site end users' opportunities to travel by foot.
- G.3.10.4 **Road Access:** Site 624 is well connected to the existing road network. The proposed development at this site would therefore be expected to provide site end users with good access to existing roads, resulting in a minor positive impact on accessibility.
- G.3.10.5 **Local Services:** The nearest convenience stores include Waitrose. Site 624 is located within the sustainable target distance to this convenience store. Therefore, the proposed development at this site would be expected to have a minor positive impact on site end users' access to local services.

G.3.11 SA Objective 11 – Education

- G.3.11.1 **Primary School:** Cannock is served by several primary schools, including St Luke's C of E School and Longford Primary School. Site 624 is located outside the sustainable target distance to these primary schools, and therefore, the proposed development at this site would be expected to have a minor negative impact on the access of new residents to these educational facilities.
- G.3.11.2 **Secondary School:** Cannock is served by several secondary schools, including Cheslyn Hay High School, South Staffordshire College and Cardinal Griffin Catholic High School. Site 624 is located outside the sustainable target distance to these secondary schools, and therefore, the proposed development at this site would be expected to have a minor negative impact on the access of new residents to these educational facilities.
- G.3.11.3 The proposed development at Site 624 would be expected to have a major negative impact on new residents' access to both primary and secondary education.

G.3.12 SA Objective 12 – Economy

- G.3.12.1 **Access to Employment:** Site 624 is located in an area with 'poor' sustainable access to employment opportunities, and therefore, the proposed development site would be expected to have a minor negative impact on site end users' access to employment.

G.4 Coven

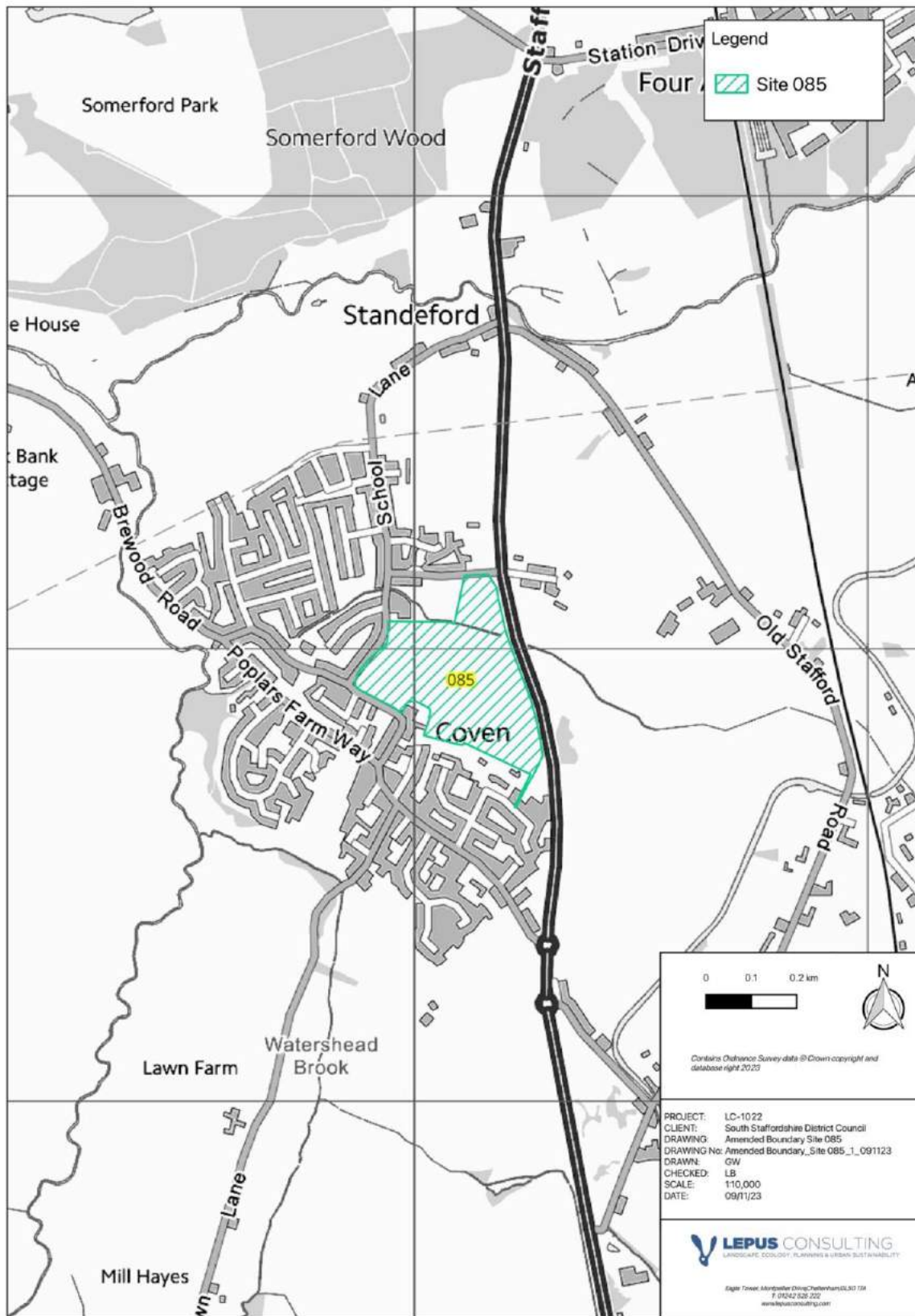


Figure G.4.1: Location of amended Site 085 within Coven

Coven Cluster

This cluster is located towards the north of the South Staffordshire District. See the Coven cluster map (**Figure G.4.1**) for the location of the amended site.

Site Reference	Site Address	Site use	Area (ha)
085	Land at Grange Farm	Residential-led	9.4

	1	2	3	4	5	6	7	8	9	10	11	12
Site 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
085	+/-	-	-	-	-	-	+	-	-	-	-	-

G.4.1 SA Objective 1 – Climate Change Mitigation

G.4.1.1 See **Appendix D**.

G.4.2 SA Objective 2 – Climate Change Adaptation

G.4.2.1 **Fluvial Flooding:** Site 085 is located wholly within Flood Zone 1. A minor positive impact would be expected, as the proposed development at this location would be likely to locate site end users away from areas at risk of fluvial flooding.

G.4.2.2 **Surface Water Flooding:** A proportion of Site 085 coincides with areas of low and medium surface water flood risk. The proposed development at this site would be expected to have a minor negative impact on surface water flood risk, as development would be likely to locate site end users in areas at risk of flooding, as well as exacerbate surface water flood risk in surrounding locations.

G.4.3 SA Objective 3 – Biodiversity & Geodiversity

G.4.3.1 **Habitats Sites:** Site 085 is located within 15km of ‘Cannock Chase’ SAC. A minor negative impact would be expected as a result of the proposed development at this site, due to the increased risk of development-related threats and pressures on this Habitats site.

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

G.4.3.3 **SSSI IRZ:** Site 085 is located within an IRZ which states that "*Residential development of 50 units or more*" should be consulted on with Natural England. Therefore, the proposed development at this site could potentially have a minor negative impact on the features for which nearby SSSIs have been designated.

G.4.4 SA Objective 4 – Landscape & Townscape

G.4.4.1 **Landscape Character:** The majority of Site 085 is located within RCA 'Cannock Chase and Cankwood' and is partially urban, the LCT 'Settled Heathlands' and partially 'urban'. The characteristic landscape features of this LCT are "*primarily arable and pasture farming: flat to gently rolling landform; hedged fields; regular and irregular hedgerows, trees; straight and winding*". Site 085 comprises hedged fields, and therefore, the proposed development at this site could potentially be discordant with the key characteristics of this LCT. Therefore, a minor negative impact on the local landscape character is identified.

G.4.4.2 **Views from the PRow Network:** Site 085 coincides with a PRow. The proposed development at this site could potentially alter the views experienced by users of this footpath. As a result, a minor negative impact on the local landscape is identified.

G.4.4.3 **Views of Local Residents:** The proposed development at Site 085 could potentially alter the views experienced by local residents, including those on School Lane and Brewood Road. Therefore, a minor negative impact on the local landscape is identified.

G.4.4.4 **Landscape Sensitivity:** Site 085 is considered by the Landscape Sensitivity Study to be within an area of 'moderate' landscape sensitivity. Development at this site has the potential to have a minor negative impact.

G.4.4.5 **Urbanisation of the Countryside:** Site 085 is located in the open countryside surrounding Coven. The proposed development at this site would be likely to contribute towards urban sprawl and therefore have a minor negative impact on the local landscape.

G.4.5 SA Objective 5 – Pollution & Waste

G.4.5.1 **Main Road:** Site 085 is located partially within 200m of the A449. The proposed development at this site could potentially expose some site end users to higher levels of transport associated air and noise pollution. Traffic using the A449 would be expected to have a minor negative impact on air quality and noise at this site.

G.4.5.2 **Groundwater SPZ:** Site 085 coincides with the catchment (Zone III) of a groundwater SPZ. The proposed development at this site could potentially increase the risk of groundwater contamination within this SPZ, and therefore, result in a minor negative impact on local groundwater resources.

G.4.6 SA Objective 6 – Natural Resources

- G.4.6.1 **Previously Developed Land:** Site 085 comprises previously undeveloped land. The proposed development at this site would be likely to result in a minor negative impact on natural resources, due to the loss of previously undeveloped land. This negative impact would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.
- G.4.6.2 **ALC:** Site 085 is primarily situated on ALC Grade 3 land, which could potentially represent some of South Staffordshire's BMV land. Therefore, a minor negative impact would be expected as a result of the proposed development at this site, due to the loss of this agriculturally important natural resource.

G.4.7 SA Objective 7 – Housing

- G.4.7.1 See **Appendix D**.

G.4.8 SA Objective 8 – Health & Wellbeing

- G.4.8.1 **NHS Hospital:** The closest NHS hospital with an A&E department is New Cross Hospital, located approximately 6.8km south east of Site 085. The proposed development at this site could potentially restrict the access of site end users to this essential health facility. Therefore, a minor negative impact is identified.
- G.4.8.2 **GP Surgery:** The closest GP surgeries to this cluster includes Brewood Medical Practice. Site 085 is located outside the sustainable target distance to GP surgeries. The proposed development at this site would be expected to have a minor negative impact on the access of site end users to these healthcare facilities.
- G.4.8.3 **Leisure Centre:** The closest leisure facility is Codsall Leisure Centre, located approximately 4.8km from Site 085. Site 085 is located outside the sustainable target distance to leisure centres. The proposed development at this site would be expected to have a minor negative impact on the access of site end users to these leisure facilities.
- G.4.8.4 **AQMA:** Site 085 is located over 200m from the nearest AQMA, and therefore, a minor positive impact would be expected for the health and wellbeing of site end users at this site.
- G.4.8.5 **Main Road:** Site 085 is located within 200m of the A449. The proposed development at this site could potentially expose site end users to higher levels of traffic associated emissions, which would be likely to have a minor negative impact on the health of site end users.
- G.4.8.6 **Access to Public Greenspace:** Site 085 is located within the sustainable target distance to a public greenspace. Therefore, a minor positive impact is identified at this site, as the proposed development would be likely to provide site end users with good access to outdoor space and a diverse range of natural habitats, which is known to have physical and mental health benefits.

G.4.8.7 **PRoW/Cycle Network:** Site 085 is located within the sustainable target distance to the PRoW and cycle networks. The proposed development at this site would be likely to provide site end users with good pedestrian and cycle access and encourage physical activity, and therefore, have a minor positive impact on the health and wellbeing of local residents.

G.4.9 SA Objective 9 – Cultural Heritage

G.4.9.1 **Grade II Listed Building:** Site 085 is located in close proximity to several Grade II listed buildings including: 'Church of St Paul', 'The Beeches' and 'Grange Farmhouse'. The proposed development at this site could potentially have a minor negative impact on the settings of these Listed Buildings.

G.4.9.2 **Historic Character:** Site 085 is located within an area of 'medium' historic value. The proposed development at this site could potentially have a minor negative impact on historic character.

G.4.10 SA Objective 10 – Transport & Accessibility

G.4.10.1 **Bus Stop:** Site 085 is located inside the sustainable target distance to bus stops providing regular services. The proposed development at this site would be likely to have a minor positive impact on site end users' access to bus services.

G.4.10.2 **Railway Station:** Site 085 is located outside the sustainable target distance to Bilbrook Railway Station and Codsall Station. The proposed development at this site would be likely to have a minor negative impact on site end users' access to bus services.

G.4.10.3 **Pedestrian Access:** Site 085 is well connected to the existing footpath network. The proposed development at this site would be expected to have a minor positive impact on site end users' opportunities to travel by foot.

G.4.10.4 **Road Access:** Site 085 is well connected to the existing road network. The proposed development at this site would therefore be expected to provide site end users with good access to existing roads, resulting in a minor positive impact on accessibility.

G.4.10.5 **Local Services:** The nearest convenience store is Co-op, located in the centre of the cluster. Site 085 is located within the sustainable target distance to this convenience store. The proposed development at this site would be expected to have a minor positive impact on the access of site end users to local services.

G.4.11 SA Objective 11 – Education

G.4.11.1 **Primary School:** Coven is served by St Paul's C of E First School. Although Site 085 is located within the sustainable target distance to a first school, the school only provides education for children up to age nine. Therefore, the proposed development at Site 085 would be expected to have a minor negative impact on the access of new residents to primary education.

G.4.11.2 **Secondary School:** The closest non-selective secondary school to Coven is Codsall Community High School. Site 085 is located outside the sustainable target distance to

these secondary schools, and therefore, the proposed development at this site would be expected to have a minor negative impact on the access of new residents to secondary education.

G.4.12 SA Objective 12 – Economy

G.4.12.1 **Access to Employment:** Site 085 is located in an area with 'reasonable' sustainable access to employment opportunities, and therefore, the proposed development at this site would be expected to have a minor positive impact on site end users' access to employment.

G.5 Essington

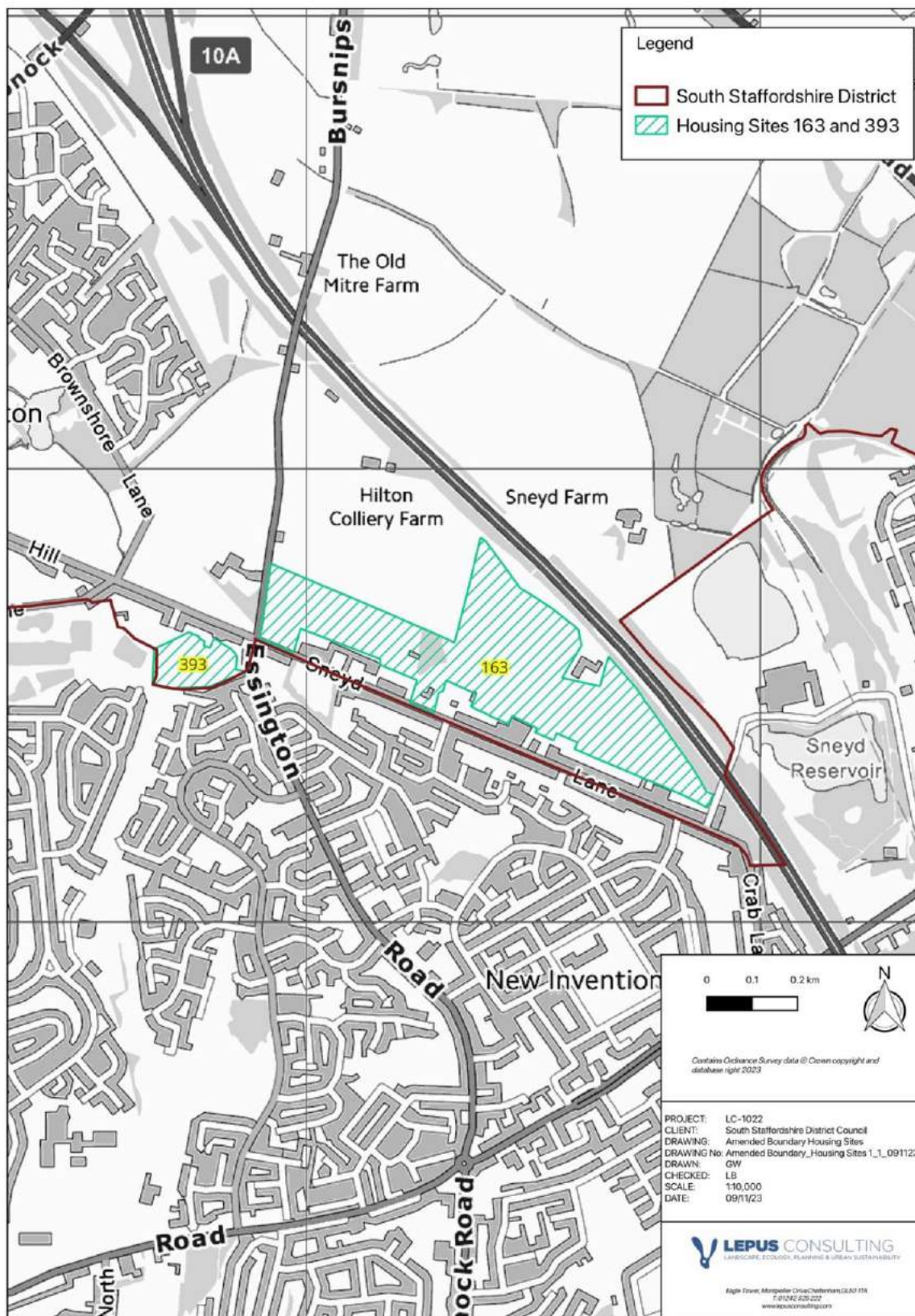


Figure G.5.1: Location of amended Sites 163 and 393 within Essington

Essington Cluster

This cluster is located in the east of the South Staffordshire District. See the Essington cluster map (**Figure G.5.1**) for location of each amended site.

Site Reference	Site Address	Site use	Area (ha)
163	Land off Sneyd Lane	Residential-led	17.57
393	Land rear 3 – 65 Upper Sneyd Road	Residential-led	1.77

	1	2	3	4	5	6	7	8	9	10	11	12
Site 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
163	+/-	--	-	--	-	-	+	-	0	-	-	+
393	+/-	+	-	-	-	-	+	-	-	-	-	+

G.5.1 SA Objective 1 – Climate Change Mitigation

G.5.1.1 See **Appendix D**.

G.5.2 SA Objective 2 – Climate Change Adaptation

G.5.2.1 **Fluvial Flooding:** Sites 163 and 393 are located entirely within Flood Zone 1. A minor positive impact would be expected at these sites, as the proposed development at these locations would be likely to locate site end users away from areas at risk of fluvial flooding.

G.5.2.2 **Surface Water Flooding:** A proportion of Site 163 coincides with areas determined to be at low, medium and high risk of surface water flooding. The proposed development at this site would be expected to have a major negative impact on surface water flood risk, as development could potentially locate some site end users in areas at high risk of surface water flooding, as well as exacerbate surface water flood risk in surrounding locations.

G.5.3 SA Objective 3 – Biodiversity & Geodiversity

G.5.3.1 **Habitats Sites:** Sites 163 and 393 are located within 13km of 'Cannock Chase' SAC. A minor negative impact would be expected as a result of the proposed development at these sites, due to the increased risk of development-related threats and pressures on this Habitats site.

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

G.5.3.3 **SSSI IRZ:** Sites 163 and 393 are located within an IRZ which states that "*Residential development of 50 units or more*" should be consulted on with Natural England. Therefore, the proposed development at these sites could potentially have a minor negative impact on the features for which nearby SSSIs have been designated.

G.5.3.4 **Priority Habitat:** Site 163 coincides with deciduous woodland priority habitat. The proposed development at this site could potentially result in the loss of these habitats, and therefore, have a minor negative impact on the overall presence of priority habitats in the Plan area.

G.5.4 SA Objective 4 – Landscape & Townscape

G.5.4.1 **Green Belt Harm:** The release of Green Belt land at Site 163 is considered by the Green Belt Study to result in 'moderate-high' harm to the purposes of the Green Belt. Development of this site is assessed as having a potentially major negative impact.

G.5.4.2 Site 393 is located in an area where development could result in 'low' Green Belt harm. Development of this site is assessed as having a negligible impact.

G.5.4.3 **Landscape Sensitivity:** Sites 163 and 393 are determined by the Landscape Sensitivity Study to be within an area of 'low-moderate' landscape sensitivity. Development of these sites has the potential to have a minor negative impact.

G.5.4.4 **Country Park:** Roughwood Country Park is located approximately 100m from Site 163. The proposed development at this site could potentially have a minor negative impact on views from this Country Park.

G.5.4.5 **Landscape Character:** Site 163 is located within the RCA 'Cannock Chase and Cankwood' and the LCT 'Coalfield Farmlands'. The characteristic landscape features of this LCT are "*flat landform, mixed arable and pasture farming; heathy pioneer woodlands; commons; medium scale hedged field pattern; hedgerow oaks; well treed brook courses; narrow winding lanes; [and] canal*". Site 163 comprises fields bordered by hedgerows and trees and as such the proposed development could potentially be discordant with the key characteristics of this LCT. Therefore, a minor negative impact on the local landscape character is identified.

G.5.4.6 **Views from the PRoW Network:** Site 163 is adjacent to a PRoW in the north of the site. The proposed development at this site could potentially alter the views experienced by users of this footpath. As a result, a minor negative impact on the local landscape is identified.

G.5.4.7 **Views for Local Residents:** The proposed development at Sites 163 and 393 could potentially alter the views experienced by local residents, including those on High Hill and Sneyd Lane. Therefore, a minor negative impact on the local landscape is identified.

G.5.4.8 **Urbanisation of the Countryside:** Sites 163 and 393 are located in the open countryside surrounding Ashmore within the north of Wolverhampton. The proposed development at this site would be likely to contribute towards urban sprawl and therefore have a minor negative impact on the local landscape.

G.5.5 SA Objective 5 – Pollution & Waste

G.5.5.1 **AQMA:** Sites 163 and 393 are located within 200m of Walsall AQMA. The proposed development at these sites would be likely to locate site end users in areas of existing poor air quality and therefore, a minor negative impact on local air quality is identified.

G.5.5.2 **Main Road:** Sites 163 and 393 are located entirely within 200m of the A462. The proposed development at these sites could potentially expose site end users to higher levels of transport associated air and noise pollution. Traffic using the A462 would be expected to have a minor negative impact on air quality and noise at these sites.

G.5.6 SA Objective 6 – Natural Resources

G.5.6.1 **Previously Developed Land:** Sites 163 and 393 wholly comprise undeveloped land. The proposed development at these sites would be likely to result in a minor negative impact on natural resources, due to the loss of previously undeveloped land. These negative impacts would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.

G.5.6.2 **ALC:** Sites 163 and 393 are primarily situated on ALC Grade 3 land, which could potentially represent some of South Staffordshire's BMV land. Therefore, a minor negative impact would be expected as a result of the proposed development at these sites, due to the loss of this agriculturally important natural resource.

G.5.7 SA Objective 7 – Housing

G.5.7.1 See **Appendix D**.

G.5.8 SA Objective 8 – Health & Wellbeing

G.5.8.1 **NHS Hospital:** Sites 163 and 393 are located within the sustainable target distance to New Cross Hospital. The proposed development at these sites would be expected to have a minor positive impact on the access of site end users to this essential health facility.

G.5.8.2 **GP Surgery:** The closest GP surgeries are Essington Medical Centre, located to the north of the cluster, and Sina Health Centre. Sites 163 is located 1.1km from Essington Medical Centre and therefore outside the sustainable target distance to GP surgeries. The proposed development at the site would be expected to have a minor negative effect on the access of site end users to GP surgeries.

G.5.8.3 Site 393 is located within 800m of the Sina Health Centre and is therefore located within the sustainable target distance. The proposed development at the site would be expected to have a minor positive impact on the access of site end users to GP surgeries.

G.5.8.4 **Leisure Centre:** The closest leisure facility is Cheslyn Hay Leisure Centre, located approximately 4km north of the cluster. Sites 163 and 393 are located outside the sustainable target distance to leisure centres. The proposed development at these sites would be expected to have a minor negative impact on the access of site end users to these leisure facilities.

- G.5.8.5 **AQMA:** Sites 163 and 393 are located within 200m of Walsall AQMA. The proposed development at these sites could potentially expose site end users to poor air quality associated with this AQMA, and therefore, have a minor negative impact on health.
- G.5.8.6 **Main Road:** Sites 163 and 393 are located within 200m of a main road. The proposed development at this site would be expected to have a minor negative impact on health, as site end users would be located in areas of traffic related air and noise pollution.
- G.5.8.7 **Access to Public Greenspace:** Sites 163 and 393 are located within the sustainable target distance to a public greenspace. Therefore, a minor positive impact would be expected at these sites, as the proposed development would be likely to provide site end users with good access to outdoor space and a diverse range of natural habitats, which is known to have physical and mental health benefits.
- G.5.8.8 **PRoW/Cycle Network:** Sites 163 and 393 are located within the sustainable target distance to the PRoW network, with Site 163 also located within 600m of the cycle network. The proposed development at these sites would be likely to provide site end users with good pedestrian and/or cycle access and encourage physical activity, and therefore, have a minor positive impact on the health and wellbeing of local residents.

G.5.9 SA Objective 9 – Cultural Heritage

- G.5.9.1 **Archaeology:** Site 393 coincides with archaeological important assets, including the 'No.3 and No.4 Pit, Allen's Rough Colliery, Essington'. Therefore, the proposed development at the site would be expected to have a minor negative impact on the archaeological assets.

G.5.10 SA Objective 10 – Transport & Accessibility

- G.5.10.1 **Bus Stop:** Sites 163 and 393 are located within the sustainable target distance to bus stops providing regular services. The proposed development at these sites would be likely to have a minor positive impact on site end users' access to bus services.
- G.5.10.2 **Railway Station:** Site 163 is located inside of the sustainable target distance to Bloxwich North Station. The proposed development at the site would be likely to have a minor positive impact on site end users' access to rail services. Site 393 is located outside the sustainable target distance to this station. The proposed development at this site would be likely to have a minor negative impact on site end users' access to rail services.
- G.5.10.3 **Pedestrian Access:** Site 393 is well connected to the existing footpath network. The proposed development at the site would be expected to have a minor positive impact on site end users' opportunities to travel by foot. Site 163 has poor connections to existing footpath networks. The proposed development at this site would be expected to have a minor negative impact on site end users' opportunities to travel by foot.
- G.5.10.4 **Road Access:** Sites 163 and 393 are well connected to the existing road network. The proposed development at these sites would therefore be expected to provide site end users with good access to existing roads, resulting in a minor positive impact on accessibility.

G.5.10.5 **Local Services:** The nearest convenience store is Aldi, located in the centre of the cluster. Both Site 163 and 393 are located within the sustainable target distance to this convenience store. The proposed development at these sites would be expected to have a minor positive impact on the access of site end users to local services.

G.5.11 SA Objective 11 – Education

G.5.11.1 **Primary School:** Essington is served by several primary schools, including St John's Primary Academy, St Albans C of E Primary School, Beacon Primary School, Berrybrook Primary School, Long Knowle Primary School and Corpus Christi Catholic Primary School. Site 393 and the majority of Site 163 are located within the sustainable target distance to a primary school. Therefore, the proposed development at these sites would be expected to have a minor positive impact on the access of new residents to primary education.

G.5.11.2 **Secondary School:** Essington is served by Moreton School and Wednesfield High School. Sites 163 and 393 are located outside the sustainable target distance to these secondary schools, and therefore, the proposed development at these sites would be expected to have a minor negative impact on the access of new residents to secondary education.

G.5.12 SA Objective 12 – Economy

G.5.12.1 **Access to Employment:** Site 163 and Site 393 are located in an area providing 'reasonable' sustainable access to employment opportunities. The proposed development at these sites would be expected to have a minor positive impact on site end users' access to employment.

G.6 Featherstone

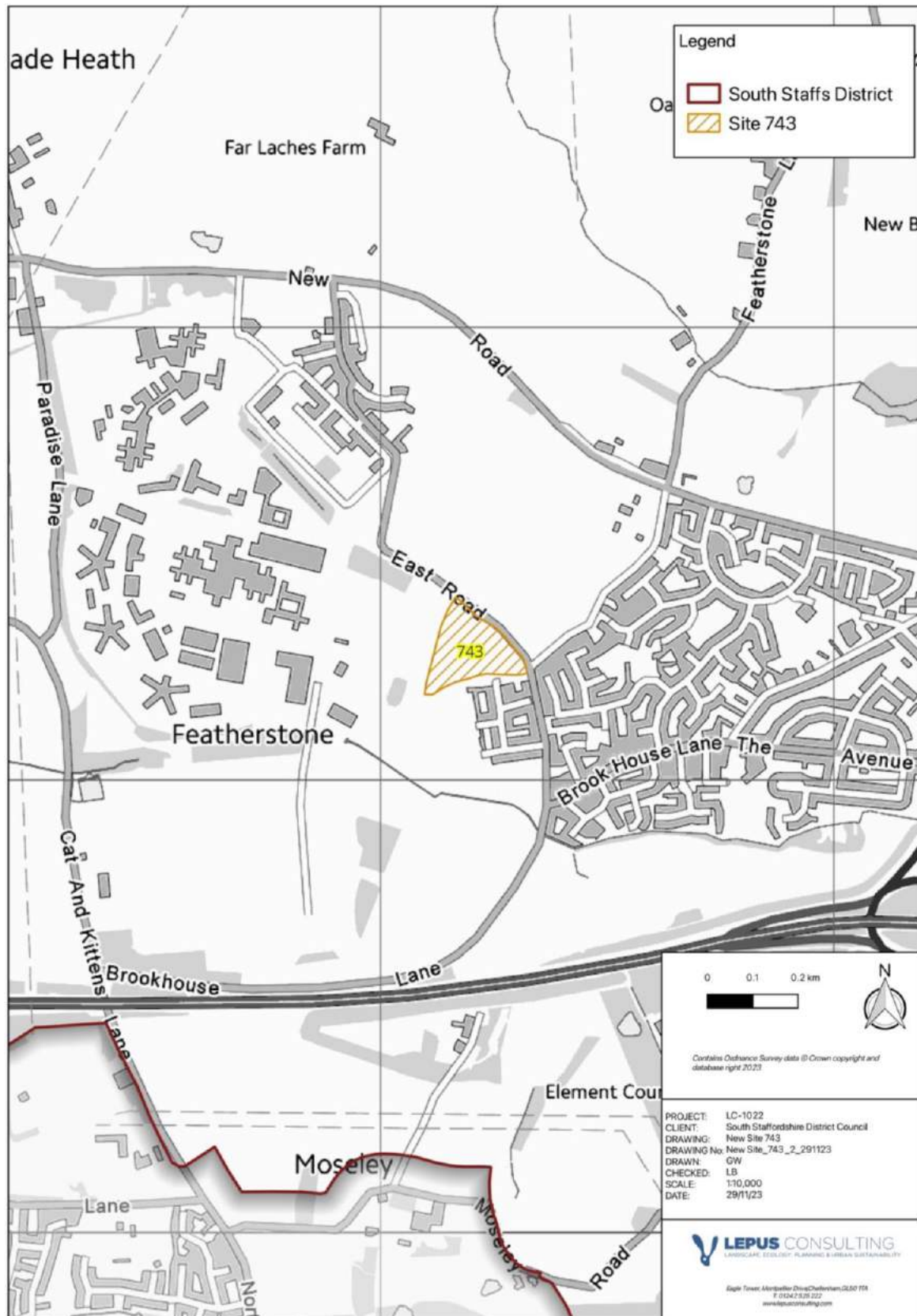


Figure G.6.1: Location of new Site 743 within Featherstone

Featherstone Cluster

This cluster is located in the east of the South Staffordshire District. See the Featherstone cluster map (**Figure G.6.1**) for the location of the new site.

Site Reference	Site Address	Site use	Area (ha)
743	Land off East Road	Residential-led	2.49

	1	2	3	4	5	6	7	8	9	10	11	12
Site 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
743	+/-	-	-	-	-	-	+	-	-	-	-	-

G.6.1 SA Objective 1 – Climate Change Mitigation

G.6.1.1 See **Appendix D**.

G.6.2 SA Objective 2 – Climate Change Adaptation

G.6.2.1 **Fluvial Flooding:** Site 743 is located entirely within Flood Zone 1. A minor positive impact is identified at this site, as the proposed development at this location would be likely to locate site end users away from areas at risk of fluvial flooding.

G.6.2.2 **Surface Water Flooding:** Site 743 coincides with areas determined to be of low and medium surface water flood risk. The proposed development at this site would be expected to have a minor negative impact on surface water flood risk, as development could potentially locate some site end users in areas at high risk of surface water flooding, as well as exacerbate surface water flood risk in surrounding locations.

G.6.3 SA Objective 3 – Biodiversity & Geodiversity

G.6.3.1 **Habitats Sites:** Site 743 is located within 15km of 'Cannock Chase' SAC. A minor negative impact would be expected as a result of the proposed development at this site, due to the increased risk of development-related threats and pressures on this Habitats site.

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

G.6.3.3 **SSSI IRZ:** Site 743 is located within an IRZ which states that "*Residential development of 50 units or more*" should be consulted on with Natural England. Therefore, the proposed development at this site could potentially have a minor negative impact on the features for which nearby SSSIs have been designated.

G.6.4 SA Objective 4 – Landscape & Townscape

G.6.4.1 **Landscape Character:** Site 743 is located within RCA 'Cannock Chase and Cankwood' and is within the LCT 'Settled Heathlands'. The characteristic landscape features of this LCT are "*primarily arable and pasture farming; flat to gently rolling landform; hedged fields; regular and irregular hedgerows, trees; straight and winding*". Site 743 comprises hedged fields, and as such the proposed development could potentially be discordant with the key characteristics of this LCT.

G.6.4.2 **Views for Local Residents:** The proposed development at Site 743 could potentially alter the views experienced by local residents, including those on East Road and Featherstone Lane. Therefore, a minor negative impact on the local landscape is identified.

G.6.4.3 **Green Belt Harm:** The release of Green Belt land at Site 743 is considered by the Green Belt Study to result in 'low-moderate' harm to the purposes of the Green Belt. Development of this site is assessed as having a potentially minor negative impact.

G.6.4.4 **Landscape Sensitivity:** Site 743 is determined by the Landscape Sensitivity Study to be within an area of 'low to moderate' landscape sensitivity. Development at the site has the potential to have a minor negative impact.

G.6.4.5 **Urbanisation of the Countryside:** Site 743 is located in the open countryside surrounding Featherstone. The proposed development at this site would be likely to contribute towards urban sprawl and therefore have a minor negative impact on the local landscape.

G.6.5 SA Objective 5 – Pollution & Waste

G.6.5.1 **Groundwater SPZ:** The majority of Site 743 is located within the catchment (Zone III) of a groundwater SPZ. The proposed development at this site could potentially increase the risk of groundwater contamination within this SPZ, and therefore, result in a minor negative impact on local groundwater resources.

G.6.6 SA Objective 6 – Natural Resources

G.6.6.1 **Previously Developed Land:** Site 743 comprises previously undeveloped land. The proposed development at this site would be likely to result in a minor negative impact on natural resources, due to the loss of previously undeveloped land. This negative impact would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.

G.6.6.2 **ALC:** Site 743 is primarily situated on ALC Grade 3 land, which could potentially represent some of South Staffordshire’s BMV land. Therefore, a minor negative impact would be expected as a result of the proposed development at this site, due to the loss of this agriculturally important natural resource.

G.6.7 SA Objective 7 – Housing

G.6.7.1 See **Appendix D**.

G.6.8 SA Objective 8 – Health & Wellbeing

G.6.8.1 **NHS Hospital:** Site 743 is located outside the sustainable target distance to New Cross Hospital. The proposed development at this site could potentially restrict the access of site end users to this essential health facility. Therefore, a minor negative impact is identified.

G.6.8.2 **GP Surgery:** The majority of Site 743 is located outside the sustainable target distance to Featherstone Family Health Centre. The proposed development at this site would be expected to have a minor negative effect on the access of site end users to GP surgeries.

G.6.8.3 **Leisure Centre:** The closest leisure facility is Cheslyn Hay Leisure Centre, located approximately 4.3km from Site 743. Site 743 is located outside the sustainable target distance to leisure centres. The proposed development at this site would be expected to have a minor negative impact on the access of site end users to these leisure facilities.

G.6.8.4 **AQMA:** Site 743 is located over 200m from the nearest AQMA, and therefore, a minor positive impact would be expected for the health and wellbeing of site end users at this site.

G.6.8.5 **Main Road:** Site 743 is located entirely over 200m from the nearest main road. Therefore, a minor positive impact would be expected for the health and wellbeing of site end users at this site.

G.6.8.6 **Access to Public Greenspace:** Site 743 is located within the sustainable target distance to a public greenspace. Therefore, a minor positive impact is identified at this site, as the proposed development would be likely to provide site end users with good access to outdoor space and a diverse range of natural habitats, which is known to have physical and mental health benefits.

G.6.8.7 **PRoW/Cycle Network:** Site 743 is located within the sustainable target distance to the PRoW network. The proposed development at this site would be likely to provide site end users with good pedestrian access and encourage physical activity, and therefore, have a minor positive impact on the health and wellbeing of local residents.

G.6.9 SA Objective 9 – Cultural Heritage

G.6.9.1 **Archaeology:** Site 743 is adjacent to the archaeological features ‘Royal Ordnance Factory (Shell Filling Factory), Cat and Kittens Lane, Featherstone’. The proposed development at this site could potentially alter the setting or significance of these archaeological features, and as such, have a minor negative impact on the historic environment.

G.6.9.2 **Historic Character:** Site 743 is located within an area of 'medium' historic value. The proposed development at this site could potentially have a minor negative impact on historic character.

G.6.10 SA Objective 10 – Transport & Accessibility

G.6.10.1 **Bus Stop:** Site 743 is located within the sustainable target distance to bus stops providing a regular service (located 300m from the nearest bus stop). The proposed development at this site would be likely to have a minor positive impact on site end users' access to bus services.

G.6.10.2 **Railway Station:** Site 743 is located outside the sustainable target distance to Bilbrook Railway Station and Codsall Station. The proposed development at this site would be likely to have a minor negative impact on site end users' access to bus services.

G.6.10.3 **Pedestrian Access:** Site 743 is disconnected from the existing footpath network. The proposed development at this site would be expected to have a minor negative impact on site end users' opportunities to travel by foot.

G.6.10.4 **Road Access:** Site 743 is well connected to the existing road network. The proposed development at this site would therefore be expected to provide site end users with good access to existing roads, resulting in a minor positive impact on accessibility.

G.6.10.5 **Local Services:** Site 743 is located outside the sustainable target distance to the nearest convenience store. The proposed development at this site would be expected to have a minor negative impact on the access of site end users to local services.

G.6.11 SA Objective 11 – Education

G.6.11.1 **Primary School:** The closest primary schools to Featherstone include Berrybrook Primary School, Featherstone Academy, St Paul's C of E First School and St Anthony's Catholic Primary School. Site 743 is located within the sustainable target distance to Featherstone Academy. Therefore, the proposed development at this site would be expected to have a minor positive impact on the access of new residents to primary education.

G.6.11.2 **Secondary School:** The closest secondary schools to Featherstone include Moreton School and Ormiston New Academy. Site 743 is located outside the sustainable target distance to these secondary schools. Therefore, the proposed development at this site would be expected to have a minor negative impact on the access of new residents to secondary education.

G.6.12 SA Objective 12 – Economy

G.6.12.1 **Access to Employment:** Site 743 is located outside the assessment area for the Rural Services and Facilities Audit. The proposed development at this site could potentially restrict the access of site end users to employment opportunities and therefore, a minor negative impact is identified.

G.7 Pattingham



Figure G.7.1: Location of amended Site 253 within Pattingham

Pattingham Cluster

This cluster is located in the west of the South Staffordshire District. See the Pattingham cluster map (**Figure G.7.1**) for the location of the amended site.

Site Reference	Site Address	Site use	Area (ha)
253	Land off Westbeech Road	Residential-led	4.35

	1	2	3	4	5	6	7	8	9	10	11	12
Site 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
253	+/-	+	+/-	--	-	-	+	-	-	-	-	-

G.7.1 SA Objective 1 – Climate Change Mitigation

G.7.1.1 See **Appendix D**.

G.7.2 SA Objective 2 – Climate Change Adaptation

G.7.2.1 **Fluvial Flooding:** Site 253 is located wholly within Flood Zone 1. A minor positive impact would be expected at this site, as the proposed development would be likely to locate site end users away from areas at risk of fluvial flooding.

G.7.3 SA Objective 3 – Biodiversity & Geodiversity

G.7.3.1 **Habitats Sites:** At the time of writing the potential impact of development on Habitats sites is uncertain. The emerging HRA will provide more detailed analysis of likely impacts and identification of impact pathways beyond those considered in the SA.

G.7.4 SA Objective 4 – Landscape & Townscape

G.7.4.1 **Green Belt Harm:** The release of Green Belt land at Site 253 is considered by the Green Belt Study to result in 'moderate-high' levels of harm to the purposes of the Green Belt. Development of this site is assessed as having a potentially major negative impact.

G.7.4.2 **Landscape Sensitivity:** Site 253 is considered by the Landscape Sensitivity Study to be within an area of 'high' landscape sensitivity. Development of this site has been assessed as having a potentially major negative impact.

G.7.4.3 Landscape Character: Site 253 is located within the RCA 'Mid Severn Sandstone Plateau' and the LCT 'Sandstone Estatelands'. The characteristic landscape features of this LCT are "*estate plantations; heathy ridge woodlands; hedgerow oaks; well treed stream valleys; smooth rolling landform with scarp slopes; red brick farmsteads and estate cottages; mixed intensive arable and pasture farming; large hedged fields; halls and associated parkland; [and] canal*". Site 253 comprises a large area of woodland and as such the proposed development could potentially be discordant with the key characteristics of this LCT.

G.7.4.4 Views for Local Residents: The proposed development at Site 253 could potentially alter the views experienced by local residents, including those on College Farm Close and Westbeech Road. Therefore, a minor negative impact on the local landscape is identified.

G.7.4.5 Urbanisation of the Countryside: Site 253 is located in the open countryside surrounding Pattingham. The proposed development at this site would be likely to contribute towards urbanisation of the surrounding countryside and therefore, have a minor negative impact on the local landscape.

G.7.5 SA Objective 5 – Pollution & Waste

G.7.5.1 Groundwater SPZ: Site 253 is located partially within the catchment (Zone III) of a groundwater SPZ. The proposed development at Site 253 could potentially increase the risk of groundwater contamination within this SPZ, and therefore, result in a minor negative impact on local groundwater resources.

G.7.6 SA Objective 6 – Natural Resources

G.7.6.1 Previously Developed Land: Site 253 comprises previously undeveloped land. The proposed development at this site would be likely to result in a minor negative impact on natural resources, due to the loss of previously undeveloped land. This negative impact would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.

G.7.6.2 ALC: Site 253 is situated on mostly ALC Grades 1 and partially Grade 2, which are considered to be some of South Staffordshire's BMV land. Therefore, a minor negative impact would be expected as a result of the proposed development at this site, due to the loss of this agriculturally important natural resource.

G.7.7 SA Objective 7 – Housing

G.7.7.1 See **Appendix D**.

G.7.8 SA Objective 8 – Health & Wellbeing

G.7.8.1 NHS Hospital: The closest NHS hospital with an A&E department is New Cross Hospital, located east of the cluster. Site 253 are outside the sustainable target distance from this hospital. The proposed development at the site could potentially restrict the access of site end users to this essential healthcare facility. Therefore, a minor negative impact is identified.

- G.7.8.2 **GP Surgery:** The closest GP surgery is Pattingham Surgery. Site 253 is located within the sustainable target distance to this GP surgery. The proposed development at the site would be expected to have a minor positive impact on the access of site end users to GP surgeries.
- G.7.8.3 **Leisure Centre:** The closest leisure facilities are Codsall Leisure Centre and Wombourne Leisure Centre. Site 253 is located outside the sustainable target distance to these leisure facilities, and therefore, a minor negative impact on the access to leisure facilities of site end users is identified.
- G.7.8.4 **AQMA:** Site 253 is located over 200m from the nearest AQMA, and therefore, a minor positive impact would be expected for the health and wellbeing of site end users.
- G.7.8.5 **Main Road:** Site 253 is located over 200m from a main road. The proposed development at the site would be expected to have a minor positive impact on health, as site end users would be located away from traffic related air and noise pollution.
- G.7.8.6 **Access to Public Greenspace:** Site 253 is located within 600m of a public greenspace. Therefore, a minor positive impact would be expected at the site, as the proposed development would be likely to provide site end users with good access to outdoor space and a diverse range of natural habitats, which is known to have physical and mental health benefits.
- G.7.8.7 **PRoW/Cycle Network:** Site 253 is located within 600m of the PRoW network. The proposed development at the site would be likely to provide site end users with good pedestrian access and encourage physical activity, and therefore, have a minor positive impact on the health and wellbeing of local residents.

G.7.9 SA Objective 9 – Cultural Heritage

- G.7.9.1 **Conservation Area:** Site 253 is adjacent to 'Pattingham' Conservation Area. The proposed development at the site could potentially alter the setting of this Conservation Area and, as a result, have a minor negative impact on the historic environment.
- G.7.9.2 **Registered Parks and Gardens:** Site 253 is located within approximately 550m from 'Patshull Hall' RPG. The proposed development at this site could potentially have a minor negative impact on the setting of this RPG.
- G.7.9.3 **Historic Character:** Site 253 is located within an area of 'medium' historic value. The proposed development at the site could potentially have a minor negative impact on historic character.

G.7.10 SA Objective 10 – Transport & Accessibility

- G.7.10.1 **Bus Stop:** Site 253 is located within the sustainable target distance to bus stops on Wolverhampton Road providing regular services. The proposed development at this site would be likely to have a minor positive impact on site end users' access to bus services.
- G.7.10.2 **Railway Station:** The closest railway station is Albrighton Railway Station, located approximately 6.1km to the north of the cluster. Site 253 is located outside the sustainable

target distance to this station. Therefore, the proposed development at this site would be likely to have a minor negative impact on site end users' access to rail services.

G.7.10.3 **Pedestrian Access:** Site 253 currently has poor access to the surrounding footpath network. The proposed development at the site could potentially have a minor negative impact on local accessibility.

G.7.10.4 **Road Access:** Site 253 is well connected to the existing road network. The proposed development at the site would therefore be expected to provide site end users with good access to existing roads, resulting in a minor positive impact on accessibility.

G.7.10.5 **Local Services:** The nearest convenience store is Pattingham Co-op. Site 253 is located within the sustainable target distance to this convenience store. Therefore, the proposed development at the site would be expected to have a minor positive impact on site end users' access to local services.

G.7.11 SA Objective 11 – Education

G.7.11.1 **Primary School:** Pattingham is served by St Chads C of E Primary School. Site 253 is located within the sustainable target distance to this primary school. The proposed development at the site would be expected to situate new residents in locations with good access to primary education, and therefore, a minor positive impact is identified.

G.7.11.2 **Secondary School:** The closest secondary school to Pattingham is Highfields School, located approximately 6km to the south east of the cluster. Site 253 is located outside the sustainable target distance to this secondary school, and therefore, the proposed development at the site would be expected to have a minor negative impact on the access of new residents to secondary education.

G.7.12 SA Objective 12 – Economy

G.7.12.1 **Access to Employment:** Site 253 is located adjacent to areas with 'poor' sustainable access to employment opportunities, and therefore, the proposed development at the site would be expected to have a minor negative impact on site end users' access to employment.

G.8 Sedgley

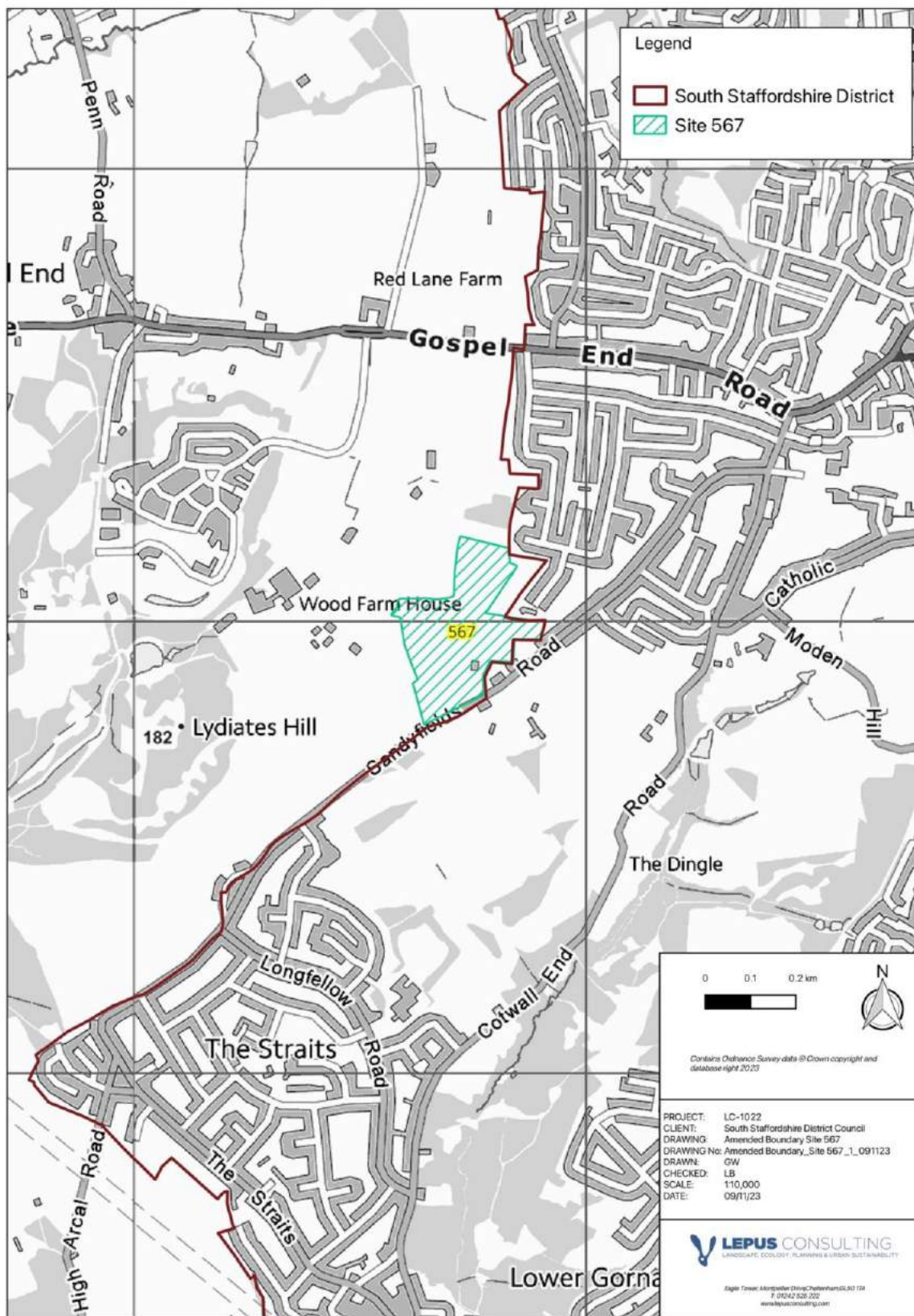


Figure G.8.1: Location of amended Site 567 within Sedgley

Sedgley Cluster

This cluster is located in the south east of the South Staffordshire District. See the Sedgley cluster map (**Figure G.8.1**) for location of the amended site.

Site Reference	Site Address	Site use	Area (ha)
567	Green Hill Farm Sandyfields	Residential-led	6.61

	1	2	3	4	5	6	7	8	9	10	11	12
Site 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
567	+/-	-	-	--	-	-	+	--	0	-	++	-

G.8.1 SA Objective 1 – Climate Change Mitigation

G.8.1.1 See **Appendix D**.

G.8.2 SA Objective 2 – Climate Change Adaptation

G.8.2.1 **Fluvial Flooding:** Site 567 is located within Flood Zone 1. A minor positive impact is identified at this site, as the proposed development would be likely to locate site end users away from areas at risk of fluvial flooding.

G.8.2.2 **Surface Water Flooding:** A proportion of Site 567 coincides with areas determined to be at low risk of surface water flooding. The proposed development at this site would be expected to have a minor negative impact on surface water flood risk, as development would be likely to locate site end users in areas at risk of surface water flooding, as well as exacerbate surface water flood risk in surrounding locations.

G.8.3 SA Objective 3 – Biodiversity & Geodiversity

G.8.3.1 **Habitats Sites:** At the time of writing the potential impact of development on Habitats sites is uncertain. The emerging HRA will provide more detailed analysis of likely impacts and identification of impact pathways beyond those considered in the SA.

G.8.3.2 **LNR:** Site 567 is located approximately 340m from 'Baggeridge Country Park' LNR. The proposed development at this site could potentially have a minor negative impact on this LNR, due to an increased risk of disturbance.

G.8.4 SA Objective 4 – Landscape & Townscape

- G.8.4.1 **Green Belt Harm:** The release of Green Belt land at Site 567 is considered by the Green Belt Study to result in 'very high' levels of harm to the purposes of the Green Belt. Therefore, development of this site is assessed as having a potentially major negative impact.
- G.8.4.2 **Landscape Sensitivity:** Site 567 is considered by the Landscape Sensitivity Study to be within an area of 'moderate-high' landscape sensitivity. Development of this site has been assessed as having a potentially major negative impact.
- G.8.4.3 **Country Park:** Site 567 is located within 600m of Baggeridge Country Park. The proposed development at this site could potentially have a minor negative impact on views from this Country Park.
- G.8.4.4 **Landscape Character:** Site 567 is located within the RCA 'Cannock Chase and Cankwood' and the LCT 'Sandstone Hills and Heaths'. The characteristic landscape features of this LCT are "*small winding lanes; irregular hedged field pattern; stunted hedgerow oaks; [and] pronounced rounded landform*". Site 567 comprises land with an irregular hedged field pattern and as such the proposed development could potentially be discordant with the key characteristics of this LCT.
- G.8.4.5 **Views from the PRow Network:** Site 567 is adjacent to a PRow. The proposed development at this site could potentially alter the views experienced by users of these footpaths. As a result, a minor negative impact on the local landscape is identified.
- G.8.4.6 **Views for Local Residents:** The proposed development at Site 567 could potentially alter the views experienced by local residents, including those on Raglan Close. Therefore, a minor negative impact on the local landscape is identified.
- G.8.4.7 **Urbanisation of the Countryside:** Site 567 is located in the open countryside surrounding Sedgley. The proposed development at this site would be likely to contribute towards urbanisation of the surrounding countryside and therefore, have a minor negative impact on the local landscape.

G.8.5 SA Objective 5 – Pollution & Waste

- G.8.5.1 **AQMA:** Site 567 is located within 200m of Dudley AQMA. The proposed development at this site would be likely to locate some site end users in areas of existing poor air quality and therefore, a minor negative impact on local air quality is identified.

G.8.6 SA Objective 6 – Natural Resources

- G.8.6.1 **Previously Developed Land:** Site 567 comprises previously undeveloped land. The proposed development at this site would be likely to result in a minor negative impact on natural resources, due to the loss of previously undeveloped land. This negative impact would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.

G.8.6.2 **ALC:** Site 567 is partially situated on ALC Grade 3 land, which could potentially represent some of South Staffordshire’s BMV land. Therefore, a minor negative impact would be expected as a result of the proposed development at this site, due to the loss of this agriculturally important natural resource.

G.8.7 SA Objective 7 – Housing

G.8.7.1 See **Appendix D**.

G.8.8 SA Objective 8 – Health & Wellbeing

G.8.8.1 **NHS Hospital:** The closest NHS hospital with an A&E department is Russells Hall Hospital, located to the south east of the cluster. Site 567 is located within the sustainable target distance to this hospital. The proposed development at this site would be expected to have a minor positive impact on the access of site end users to this essential health facility.

G.8.8.2 **GP Surgery:** The closest GP surgeries to this cluster are Northway Medical Centre and Lower Gornal Medical Practice, located to the east of the cluster. Site 567 is located outside the sustainable target distance to these GP surgeries. The proposed development at this site would be expected to have a minor negative impact on the access of site end users to GP surgeries.

G.8.8.3 **Leisure Centre:** The closest leisure facility is Wombourne Leisure Centre, located approximately 4km west of the cluster. Site 567 is located outside the sustainable target distance to this leisure facility, and therefore, a minor negative impact on the health and wellbeing of site end users is identified.

G.8.8.4 **AQMA:** Site 567 is located within 200m Dudley AQMA. The proposed development at this site could potentially expose site end users to poor air quality associated with this AQMA, and therefore, have a minor negative impact on health.

G.8.8.5 **Main Road:** Site 567 is located over 200m from a main road. The proposed development at this site would be expected to have a minor positive impact on health, as site end users would be located away from traffic related air and noise pollution.

G.8.8.6 **Access to Public Greenspace:** Site 567 is located within 600m of a public greenspace. Therefore, a minor positive impact is identified at this site, as the proposed development would be likely to provide site end users with good access to outdoor space and a diverse range of natural habitats, which is known to have physical and mental health benefits.

G.8.8.7 **PRoW/Cycle Network:** Site 567 is located within 600m of the PRoW network. The proposed development at this site would be likely to provide site end users with good pedestrian access and encourage physical activity, and therefore, have a minor positive impact on the health and wellbeing of local residents.

G.8.9 SA Objective 9 – Cultural Heritage

G.8.9.1 **Historic Environment:** Site 567 is not located in close proximity to any identified heritage assets. Therefore, the proposed development at this site would be expected to have a negligible impact on cultural heritage.

G.8.10 SA Objective 10 – Transport & Accessibility

- G.8.10.1 **Bus Stop:** Site 567 is located within the sustainable target distance to bus stops on Sandyfields Road, providing regular services. The proposed development at this site would be likely to have a minor positive impact on site end users' access to bus services.
- G.8.10.2 **Railway Station:** The closest railway station is Coseley Railway Station, located approximately 4.5km to the east of the cluster. Site 567 is located outside the sustainable target distance to this railway station. Therefore, the proposed development at this site would be likely to have a minor negative impact on site end users' access to rail services.
- G.8.10.3 **Pedestrian Access:** Site 567 currently has poor access to the surrounding footpath network. The proposed development at this site could potentially have a minor negative impact on local accessibility.
- G.8.10.4 **Road Access:** Site 567 is well connected to the existing road network. The proposed development at this site would therefore be expected to provide site end users with good access to existing roads, resulting in a minor positive impact on accessibility.
- G.8.10.5 **Local Services:** The nearest convenience stores include Londis, located approximately 800m east of the cluster, and Co-op, located approximately 2km north east of the cluster. Site 567 is located outside the sustainable target distance to these convenience stores. The proposed development at this site could potentially have a minor negative impact on the access of site end users to local services.

G.8.11 SA Objective 11 – Education

- G.8.11.1 **Primary School:** Sedgley is served by several primary schools, including Alder Coppice Primary School, Cotwall End Primary School and Straits Primary School. The majority of Site 567 is located within the sustainable target distance to these primary schools, and therefore, the proposed development at this site would be expected to have a minor positive impact on the access of new residents to primary education.
- G.8.11.2 **Secondary School:** The closest secondary schools to the Sedgley cluster include Ellowes Hall Sports College and The Dormston School. Site 567 is located within the sustainable target distance to both of these secondary schools. The proposed development at this site would be expected to situate new residents in locations with good access to secondary education, and therefore, a minor positive impact is identified.
- G.8.11.3 The proposed development at Site 567 would be expected to have a major positive impact on new residents' access to both primary and secondary education.

G.8.12 SA Objective 12 – Economy

- G.8.12.1 **Access to Employment:** Site 567 is located in an area with 'unreasonable' sustainable access to employment opportunities, and therefore, the proposed development at this site would be expected to have a minor negative impact on site end users' access to employment.

G.9 Employment Sites

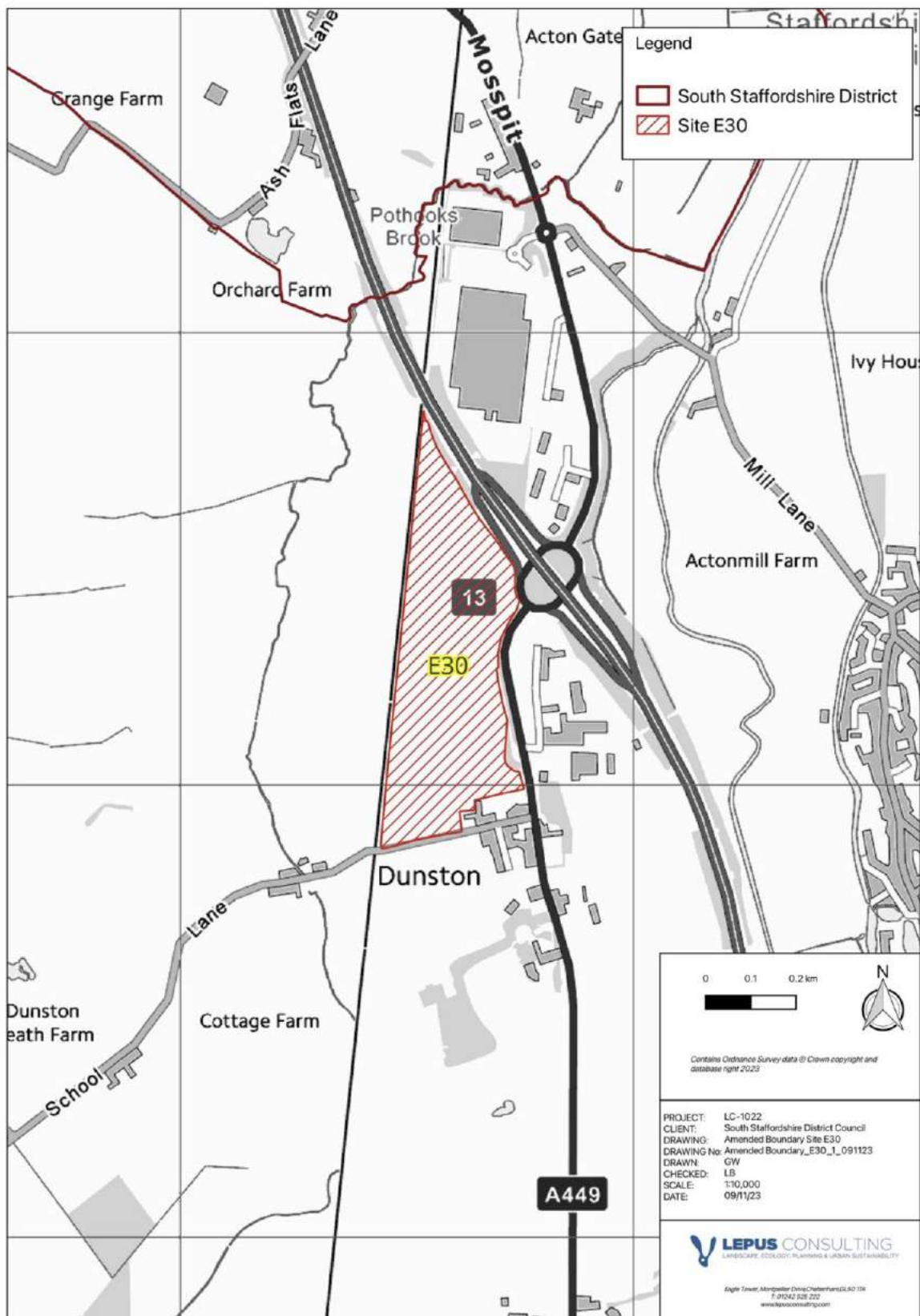


Figure G.9.1: Location of amended employment Site E30

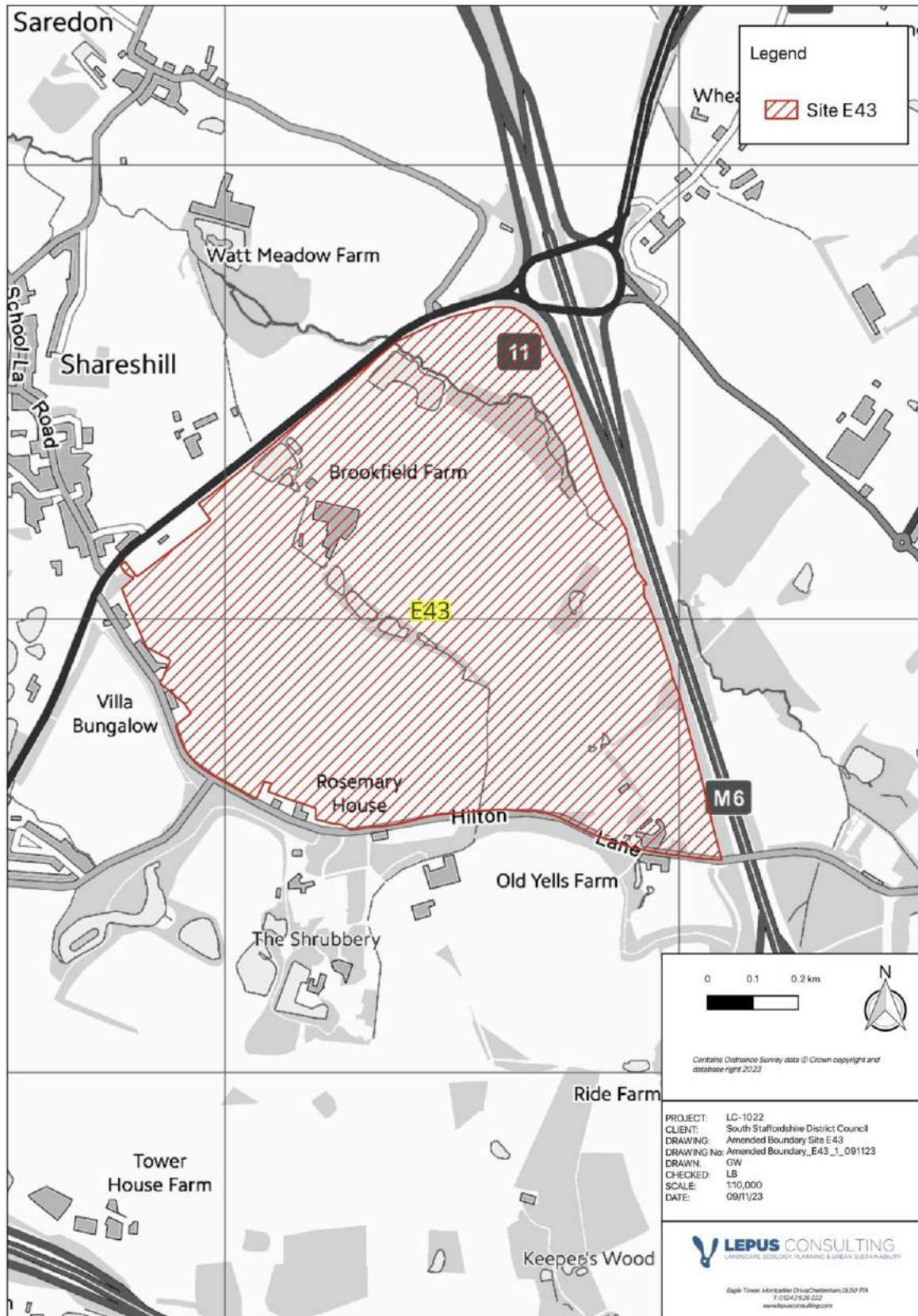


Figure G.9.2: Location of amended employment Site E43

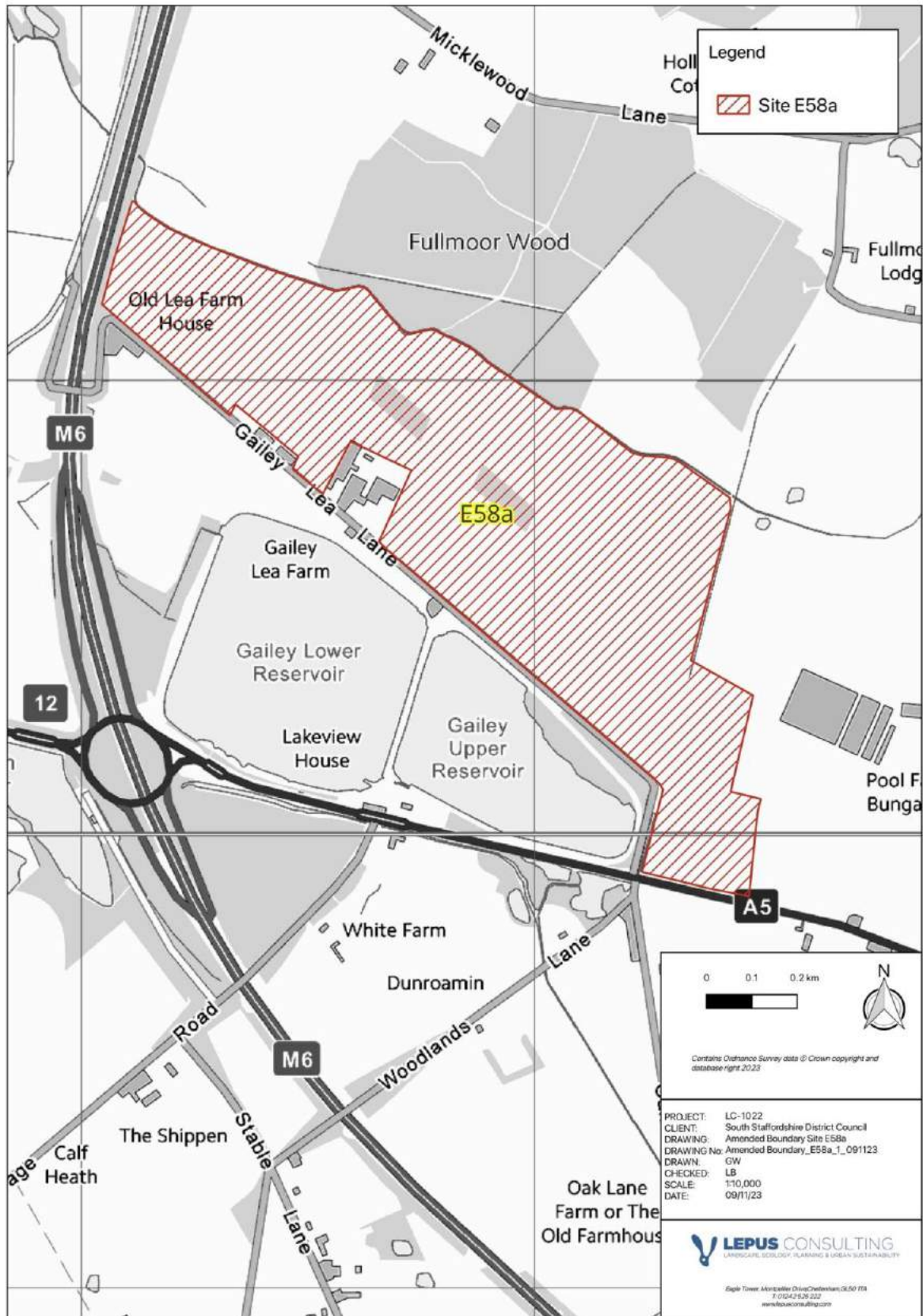


Figure G.9.3: Location of amended employment Site E58a

Employment Sites

See the Employment Sites maps for locations of each site (**Figures G.9.1, G.9.2 and G.9.3**).

Site Reference	Site Address	Site use	Area (ha)
E30	Land south of Junction 13 (M6)	Employment-led	17.80
E43	Land at J11 M6, Hilton Park.	Employment-led	99.90
E58a	Gailey Lea Farm A	Employment-led	72.1

	1	2	3	4	5	6	7	8	9	10	11	12
Site 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
E30	+/-	+	-	-	-	-	0	-	-	-	0	++
E43	+/-	--	-	--	-	-	0	-	-	-	0	++
E58a	+/-	-	-	--	-	-	0	-	-	-	0	++

G.9.1 SA Objective 1 – Climate Change Mitigation

G.9.1.1 See **Appendix D**.

G.9.2 SA Objective 2 – Climate Change Adaptation

G.9.2.1 **Fluvial Flooding:** Sites E30 and E58a are located within Flood Zone 1. A minor positive impact would be expected at these two sites, as the proposed development at these locations would be likely to locate site end users away from areas at risk of fluvial flooding.

G.9.2.2 Site E43 is partially located within Flood Zone 2 and 3 to the northern boundary of the site. The proposed development at the site could potentially locate some site end users in areas at risk of fluvial flooding, and therefore, a major negative impact is identified.

G.9.2.3 **Surface Water Flooding:** A proportion of Site E43 coincides with areas determined to be at low, medium and high risk of surface water flooding. The proposed development at the site would be expected to have a major negative impact on surface water flood risk, as development could potentially locate some site end users in areas at high risk of surface water flooding, as well as exacerbate surface water flood risk in surrounding locations.

G.9.2.4 A proportion of Site E58a coincides with areas determined to be at low and medium risk of surface water flooding. The proposed development at the site would be expected to have a minor negative impact on surface water flood risk, as development could potentially locate some site end users in areas at low and medium risk of surface water flooding, as well as exacerbate surface water flood risk to surrounding locations.

G.9.3 SA Objective 3 - Biodiversity & Geodiversity

- G.9.3.1 **Habitats Sites:** Sites E30, E43, and E58a are located within 15km of 'Cannock Chase' SAC. A minor negative impact would be expected as a result of the proposed development at these sites, due to the increased risk of development-related threats and pressures on this Habitats site.
- G.9.3.2 At the time of writing the potential impact of development on other Habitats sites is uncertain. The emerging HRA will provide more detailed analysis of likely impacts and identification of impact pathways beyond those considered in the SA.
- G.9.3.3 **Ancient Woodlands:** Site E43 is located in close proximity to 'Keepers Wood' and a stand of ancient woodland to the northwest of the site. Site E58a is located adjacent to 'Mansty Wood'. The proposed development at these two sites could potentially have a minor negative impact on these ancient woodlands, due to an increased risk of disturbance.
- G.9.3.4 **SBI:** Site E43 coincides with 'Brookfield Farm' SBI and Site E58a is adjacent to 'Gailey Reservoirs' SBI. The proposed development at these two sites could potentially have a minor negative impact on these SBIs, due to an increased risk of development-related threats and pressures.
- G.9.3.5 **Priority Habitat:** Sites E43 and E58a coincide with deciduous woodland priority habitat. The proposed development at these two sites could potentially result in the partial loss of these habitats, and therefore, have a minor negative impact on the overall presence of priority habitats in the Plan area.

G.9.4 SA Objective 4 – Landscape & Townscape

- G.9.4.1 **AONB:** Site E58a is proposed for large-scale employment uses and are located within approximately 6km from Cannock Chase AONB. The proposed development at this site could potentially have a minor negative impact on the setting of this nationally designated landscape.
- G.9.4.2 **Green Belt Harm:** The release of Green Belt land at Site E43 is considered by the Green Belt Study to result in 'high' levels of harm to the purposes of the Green Belt. Site E58a lies within a sub-parcel of land that has been assessed within an addendum to the Green Belt Study (2019), prepared in August 2022². The release of Green Belt land at Site E58a is considered by the Green Belt Study Addendum to result in 'very high' levels of harm to the purposes of the Green Belt. Therefore, development of the Sites E43 and E58a are assessed as having a potentially major negative impact.
- G.9.4.3 Site E30 was not assessed by the Green Belt study. Development at the site is likely to have a negligible impact.

²South Staffordshire District Council (2022) South Staffordshire Green Belt Study Addendum. Available at:

https://www.sstaffs.gov.uk/sites/default/files/2023-03/green_belt_study_addendum_2022.pdf [Date accessed: 13/12/23]

- G.9.4.4 **Landscape Sensitivity:** Sites E30 and E43 are considered by the Landscape Sensitivity Study to be within areas of 'moderate' landscape sensitivity. Therefore, development of these two sites have been assessed as having a potentially minor negative impact.
- G.9.4.5 Site E58a is within an area that was not assessed by the Landscape Sensitivity Study. Development of the site is assessed as having a negligible impact.
- G.9.4.6 **Landscape Character:** Site E30 is located within the RCA 'Staffordshire Plain' and the LCT 'Settled Farmlands'. The characteristic landscape features of this LCT are *"a gently undulating landform with pronounced occasional high points; mature broadleaved woodlands; hedgerow oaks and a strong irregular hedgerow pattern; well treed field ponds and stream corridors; traditional red brick farmsteads and settlements; [and] small ancient winding lanes"*.
- G.9.4.7 Site E58a is located within the RCA 'Cannock Chase and Cankwood' and the LCT 'Settled Heathlands'. The characteristic landscape features of this LCT are *"primarily arable and pasture farming: flat to gently rolling landform; hedged fields; regular and irregular hedgerows, trees; straight and winding"*.
- G.9.4.8 Site E43 is located within the RCA 'Cannock Chase and Cankwood' and the LCT 'Settled Plateau Farmland.' The characteristics landscape features of this LCT are *"Intensive arable and pasture farming; large scale field pattern with well-trimmed hedgerows; a rolling, often pronounced landform; well treed stream corridors; dispersed red brick farms; narrow winding lanes and small woodlands"*.
- G.9.4.9 The proposed development at Sites E30, E58a and E43 could potentially be discordant with the key characteristics of associated LCTs. Therefore, a minor negative impact on the local landscape character is identified.
- G.9.4.10 **Views from the PRow Network:** Sites E30, E43 and E58a coincide with PRowS. The proposed development at these three sites could potentially alter the views experienced by users of these footpaths. As a result, a minor negative impact on the local landscape is identified.
- G.9.4.11 **Views for Local Residents:** The proposed development at Sites E30 and E43 could potentially alter the views experienced by local residents, including those on School Lane and Hilton Lane. Therefore, a minor negative impact on the local landscape would be expected at these two sites.
- G.9.4.12 **Urbanisation of the Countryside:** Sites E30, E43 and E58a are located in the open countryside surrounding settlements. The proposed development at these three sites would be likely to contribute towards urbanisation of the surrounding countryside and therefore, have a minor negative impact on the local landscape.
- G.9.4.13 **Coalescence:** Site E43 is situated between the settlements of Hilton Park and Shareshill. The proposed development at the site could potentially increase the risk of coalescence between these settlements, and therefore, have a minor negative impact on the local landscape.

G.9.5 SA Objective 5 – Pollution & Waste

- G.9.5.1 **Main Road:** Sites E30, E43 and E58a are located wholly or partially within 200m of various main roads, including the A449, A460, and M6. The proposed development at these three sites could potentially expose some site end users to higher levels of transport associated air and noise pollution. Traffic using this network of main roads would be expected to have a minor negative impact on air quality and noise at these sites.
- G.9.5.2 **Railway Line:** Site E30 is located within 200m of the railway line linking Wolverhampton to Stafford. The proposed development at the site could potentially expose site end users to higher levels of noise pollution and vibrations associated with this railway line. A minor negative impact would therefore be expected.
- G.9.5.3 **Groundwater SPZ:** Site E58a coincides with the catchment (Zone III) of a groundwater SPZ. The proposed development at the site could potentially increase the risk of groundwater contamination within this SPZ, and therefore, result in a minor negative impact on local groundwater resources.
- G.9.5.4 **Watercourse:** Sites E30, E43 and E58a coincide or are within 200m of minor watercourses. The proposed development at these three sites could potentially increase the risk of contamination of these watercourses, and therefore, a minor negative impact is identified.

G.9.6 SA Objective 6 – Natural Resources

- G.9.6.1 **Previously Developed Land:** Sites E30, E43 and E58a comprise previously undeveloped land. The proposed development at these three sites would be likely to result in a minor negative impact on natural resources, due to the loss of previously undeveloped land. These negative impacts would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.
- G.9.6.2 **ALC:** Sites E30, E43 and E58a are situated on ALC Grades 2 and/or 3 land. ALC Grade 2, and potentially Grade 3, are considered to be some of South Staffordshire's BMV land. Therefore, a minor negative impact would be expected as a result of the proposed development at these three sites, due to the loss of this agriculturally important natural resource.

G.9.7 SA Objective 7 – Housing

- G.9.7.1 See **Appendix D**.

G.9.8 SA Objective 8 – Health & Wellbeing

- G.9.8.1 **NHS Hospital:** The closest NHS hospital with an A&E department to Site E30 is County Hospital, located to the north and the closest to Site E30 and Site E58a is New Cross Hospital to the south. Sites E30, E43 and E58a, are located wholly outside the sustainable target distance to these hospitals. The proposed development at these three sites could potentially restrict the access of site end users to these essential health facilities. Therefore, a minor negative impact is identified.

- G.9.8.2 **GP Surgery:** Sites E30, E43 and E58a are located wholly or partially outside the sustainable target distance to the nearest GP surgeries. The proposed development at these three sites would be expected to have a minor negative impact on the access of site end users to GP surgeries.
- G.9.8.3 **AQMA:** Sites E30, E43 and E58a are located over 200m from the nearest AQMA, and therefore, a minor positive impact would be expected for the health and wellbeing of site end users at these three sites.
- G.9.8.4 **Main Road:** Sites E30, E43 and E58a are located wholly or partially within 200m of various main roads, including the A449, A460, and M6. The proposed development at these three sites could potentially expose site end users to higher levels of traffic associated emissions, which would be likely to have a minor negative impact on the health of site end users.
- G.9.8.5 **Access to Public Greenspace:** Sites E30, E43 and E58a are located wholly or partially over 600m from a public greenspace. The proposed development at these three sites could potentially have a minor negative impact on the access of site end users to outdoor space.
- G.9.8.6 **PRoW/Cycle Network:** Sites E30, E43 and E58a are located within 600m of the PRoW network. The proposed development at these three sites would be likely to provide site end users with good pedestrian access and encourage physical activity, and therefore, have a minor positive impact on the health and wellbeing of local residents.

G.9.9 SA Objective 9 – Cultural Heritage

- G.9.9.1 **Grade I Listed Building:** Site E43 is located approximately 280m north of the Grade I Listed Building 'The Conservatory' Grade I Listed Building. The proposed development at this site could potentially have a minor negative impact on the setting of this Listed Building.
- G.9.9.2 **Grade II Listed Building:** Site E30 is located within 500m from the Grade II Listed Buildings 'Dunston Farmhouse', 'Dunston House', 'Church of St Leonard' and 'Former Stable'. Site E43 is located 300m from the Grade II Listed Building the 'Coach House'. The proposed development at these two sites could potentially have a minor negative impact on the setting of these Listed Buildings.
- G.9.9.3 **Archaeology:** Sites E30, E43 and E58a are adjacent to numerous archaeological features, including 'Clay Flat', 'Hilton Park', 'Gailey Upper Reservoir and Lower Reservoir, Penkridge' and 'Cropmark, Watling Street, Hatherton' to name a few. The proposed development at these three sites could potentially alter the setting of these archeological features, and as such, have a minor negative impact on the local historic environment.

G.9.10 SA Objective 10 – Transport & Accessibility

- G.9.10.1 **Bus Stop:** Sites E30, E43 and E58a are located wholly or partially outside the sustainable target distance to a bus stop providing regular services. Therefore, the proposed development at these three sites could potentially have a minor negative impact on site end users' access to bus services.

- G.9.10.2 **Railway Station:** Sites E30, E43 and E58a are located wholly outside the sustainable target distance to the nearest railway stations. Therefore, the proposed development at these three sites would be likely to have a minor negative impact on site end users' access to rail services.
- G.9.10.3 **Pedestrian Access:** Sites E30, E43 and E58a are well connected to the existing footpath network. The proposed development at these three sites would be expected to have a minor positive impact on site end users' opportunities to travel by foot.
- G.9.10.4 **Road Access:** Sites E30, E43 and E58a have good links to the road network. Therefore, the proposed development at these three sites would therefore be expected to provide site end users with good access to existing roads, resulting in a minor positive impact on accessibility.
- G.9.10.5 **Local Services:** Sites E30, E43 and E58a are located outside the sustainable target distance to the nearest convenience stores. The proposed development at these three sites could potentially have a minor negative impact on the access of site end users to local services.

G.9.11 SA Objective 11 – Education

- G.9.11.1 **Primary/Secondary School:** Sites E30, E43 and E58a are proposed for employment end use, and therefore, have not been assessed under the Education objective.

G.9.12 SA Objective 12 – Economy

- G.9.12.1 **Employment Floorspace:** Sites E30, E43 and E58a are proposed for employment-led end use. The proposed development at these three sites would be expected to result in a net gain in employment floorspace and provide local employment opportunities. Therefore, a major positive impact on employment floorspace is expected.

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

Appendix H Contents

H.1	Introduction	H1
H.1.1	Preface.....	H1
H.2	Pre-Mitigation Assessment	H2
H.2.1	Introduction.....	H2
H.3	Mitigating effects of LPR policies	H14
H.3.1	Introduction.....	H14
H.4	Post mitigation site assessments	H33
H.4.1	Overview	H33

Tables

Table H.2.1:	Impact matrix of all reasonable alternative site assessments pre-mitigation	H3
Table H.3.1:	Mitigating LPR Policy for SA Objective 1 - Climate Change Mitigation.....	H15
Table H.3.2:	Mitigating LPR Policy for SA Objective 2 - Climate Change Adaptation	H17
Table H.3.3:	Mitigating LPR Policy for SA Objective 3 – Biodiversity and Geodiversity	H18
Table H.3.4:	Mitigating LPR Policy for SA Objective 4 – Landscape and Townscape.....	H20
Table H.3.5:	Mitigating LPR Policy for SA Objective 5 – Pollution and Waste	H23
Table H.3.6:	Mitigating LPR Policy for SA Objective 6 – Natural Resources.....	H24
Table H.3.7:	Mitigating LPR Policy for SA Objective 7 – Housing	H25
Table H.3.8:	Mitigating LPR Policy for SA Objective 8 – Health and Wellbeing	H26
Table H.3.9:	Mitigating LPR Policy for SA Objective 9 – Cultural Heritage	H28
Table H.3.10:	Mitigating LPR Policy for SA Objective 10 – Transport and Accessibility	H29
Table H.3.11:	Mitigating LPR Policy for SA Objective 11 – Education.....	H31
Table H.3.12:	Mitigating LPR Policy for SA Objective 12 – Economy and Employment	H32
Table H.4.1:	Impact matrix of all reasonable alternative site assessments post-mitigation	H33

H.1 Introduction

H.1.1 Preface

- H.1.1.1 The process which has been used to appraise reasonable alternative sites is sequenced through two stages. Firstly, sites are assessed in terms of impacts on the baseline without consideration of mitigation. Secondly, the appraisal findings are further assessed in light of any relevant mitigation that is available through, for example, emergent local plan policies.
- H.1.1.2 The pre-mitigation assessment provides a baseline assessment of each site and identifies any local constraints. The pre-mitigation assessment does not consider mitigating factors such as Local Plan policy. The purpose of this stage is to identify the impacts that would need to be overcome for development to optimise sustainability performance.
- H.1.1.3 The post-mitigation assessment considers how mitigating factors, including Local Plan policy and other guidance, would help to avoid or reduce the impacts that were identified at the pre-mitigation stage.
- H.1.1.4 It is important to demonstrate the amount of mitigation that may be required to ensure a site can optimise sustainability performance. The level of intervention that may be required to facilitate effective mitigation varies and can help determine the eventual choice of preferred option in the plan. Sites which require low levels of intervention are likely to be preferable to sites that require complex and potentially unviable strategies.
- H.1.1.5 **Chapter H.2** sets out the pre-mitigation impacts of the 358 reasonable alternative sites considered throughout the SA process, and **Chapter H.3** provides detail on the mitigation within the LPR, and the post-mitigation impacts for these 358 sites.
- H.1.1.6 The full assessment of reasonable alternative sites considered at this stage pre-mitigation can be found in **Appendix G** of this report, with sites considered at the previous stages set out in Appendix B of the Regulation 18 (III) SA (2021)¹ or Appendix F of the Regulation 19 SA (2022)².

¹ 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: 16/02/24]

² 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: 16/02/24]

H.2 Pre-Mitigation Assessment

H.2.1 Introduction

H.2.1.1 The reasonable alternative sites considered during the preparation of the South Staffordshire LPR have been assessed in the SA in three groups, across the iterative SA stages:

- 317 reasonable alternative sites were assessed as part of the Regulation 18 (III) SA (2021);
- A further 58 reasonable alternative sites were assessed as part of the Regulation 19 SA (2022), including 39 new sites and 19 amendments to sites originally assessed in the Regulation 18 (III) SA; and
- A further 11 reasonable alternative sites have been assessed as part of this updated Regulation 19 SA (presented in **Appendix G**), including two new sites and nine amendments to sites assessed in the earlier stages.

H.2.1.2 **Table H.2.1** presents the pre-mitigation impact matrix for all 358 reasonable alternative sites considered throughout the preparation of the LPR.

H.2.1.3 It should be noted that **Table H.2.1** below supersedes the comparable table (Table G.2.1) presented in the Regulation 19 SA (2022) as it factors in all reasonable alternative sites, including amendments made since the previous stage (see **Appendix G**), as well as the latest available evidence.

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

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
023	Bednall	+/-	+	-	--	-	-	+	-	-	-	-	--
024	Bednall	+/-	+	-	--	-	-	+	-	-	-	-	--
026	Bednall	+/-	+	-	--	-	+	+	-	--	-	-	--
210	Bilbrook & Codsall	+/-	+	+/-	--	-	-	+	-	-	-	++	+
211	Bilbrook & Codsall	+/-	--	+/-	-	-	-	+	-	-	++	-	-
213	Bilbrook & Codsall	+/-	-	+/-	0	-	+	+	-	-	++	++	+
221	Bilbrook & Codsall	+/-	-	+/-	--	-	-	+	-	-	-	++	+
222	Bilbrook & Codsall	+/-	-	+/-	--	-	-	+	-	-	-	-	-
224	Bilbrook & Codsall	+/-	--	+/-	--	-	-	+	-	-	-	-	+
SAD228	Bilbrook & Codsall	+/-	+	+/-	-	-	+	+	-	-	++	++	+
236	Bilbrook & Codsall	+/-	-	+/-	--	-	-	+	-	-	-	--	-
419a/b	Bilbrook & Codsall	+/-	+	+/-	-	-	-	+	-	-	-	--	-
447	Bilbrook & Codsall	+/-	--	+/-	--	-	-	+	-	-	-	-	+
500	Bilbrook & Codsall	+/-	--	+/-	--	-	-	+	-	-	-	-	+
503	Bilbrook & Codsall	+/-	--	+/-	--	-	-	+	-	-	-	++	+
507	Bilbrook & Codsall	+/-	-	+/-	--	-	-	+	-	-	-	-	-
510	Bilbrook & Codsall	+/-	--	-	--	-	-	+	-	-	-	++	+
512	Bilbrook & Codsall	+/-	--	-	--	-	-	+	-	0	-	--	-
515	Bilbrook & Codsall	+/-	+	-	--	-	-	+	-	-	-	--	-
519	Bilbrook & Codsall	+/-	--	+/-	--	-	-	+	-	-	-	-	-
630a	Bilbrook & Codsall	+/-	+	+/-	--	0	-	+	-	-	-	--	-
630b	Bilbrook & Codsall	+/-	--	+/-	--	-	-	+	-	-	-	--	-
666	Bilbrook & Codsall	+/-	--	-	--	-	-	+	-	-	-	-	-
703	Bilbrook & Codsall	+/-	+	+/-	--	-	-	+	-	-	-	-	-
735	Bilbrook & Codsall	+/-	+	+/-	--	-	-	+	-	-	-	++	-
740	Bilbrook & Codsall	+/-	-	+/-	-	-	-	+	-	-	++	++	+
096	Bishops Wood	+/-	+	-	--	0	-	+	-	-	-	-	-
097	Bishops Wood	+/-	+	-	--	0	-	+	-	-	-	-	-
099	Bishops Wood	+/-	+	-	--	0	-	+	-	0	-	-	-
207	Bloxwich	+/-	--	-	-	-	+	+	-	-	-	++	-
492a/b/c	Bloxwich	+/-	--	-	--	-	-	+	-	-	-	-	-
319	Bobbington	+/-	+	-	-	-	-	+	-	-	-	-	--
320	Bobbington	+/-	--	+/-	--	0	-	+	-	-	-	-	--
321	Bobbington	+/-	-	+/-	--	0	-	+	-	0	-	-	--
410	Bobbington	+/-	-	-	--	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
057	Brewood	+/-	-	-	0	0	+	+	-	-	-	-	-
062	Brewood	+/-	+	-	--	-	-	+	-	-	-	-	-
067	Brewood	+/-	-	-	--	-	-	+	-	-	-	--	-
074	Brewood	+/-	+	-	--	0	-	+	-	-	-	-	-
075/075a	Brewood	+/-	+	-	--	0	-	+	-	-	-	-	-
076	Brewood	+/-	+	-	--	-	-	+	-	-	-	-	-
076a	Brewood	+/-	+	-	--	-	-	+	-	-	-	-	-
078	Brewood	+/-	+	-	--	-	-	+	-	-	-	-	-
079	Brewood	+/-	+	-	--	-	-	+	-	-	-	-	-
376	Brewood	+/-	+	-	--	0	-	+	-	-	-	-	-
611	Brewood	+/-	+	-	--	-	-	+	-	-	-	-	-
616	Brewood	+/-	-	-	--	-	-	+	-	-	-	-	-
617	Brewood	+/-	--	-	--	-	-	+	-	-	-	--	-
658	Brewood	+/-	-	-	--	0	-	+	-	-	-	-	-
202	Cannock	+/-	+	-	--	-	-	+	-	-	-	-	-
203	Cannock	+/-	--	-	--	-	-	+	-	0	-	--	-
474	Cannock	+/-	--	-	--	-	-	+	-	--	-	-	-
529	Cannock	+/-	+	-	--	-	-	+	-	-	-	-	-
624	Cannock	+/-	+	-	--	-	-	+	-	-	-	--	-
659	Cannock	+/-	+	-	--	0	-	+	-	0	-	++	-
720	Cannock	+/-	-	-	-	-	+	+	-	-	-	--	--
116	Cheslyn Hay & Great Wyrley	+/-	--	-	--	0	-	+	-	-	-	-	-
119a	Cheslyn Hay & Great Wyrley	+/-	--	-	-	0	-	+	-	-	-	++	+
119b	Cheslyn Hay & Great Wyrley	+/-	+	-	-	-	-	+	-	-	-	++	-
120	Cheslyn Hay & Great Wyrley	+/-	--	-	-	-	-	+	-	-	-	-	+
131	Cheslyn Hay & Great Wyrley	+/-	--	-	--	-	-	+	-	-	-	-	-
134	Cheslyn Hay & Great Wyrley	+/-	+	-	-	-	-	+	-	-	-	-	--
136	Cheslyn Hay & Great Wyrley	+/-	-	-	-	-	-	+	-	-	++	-	+
SAD136	Cheslyn Hay & Great Wyrley	+/-	+	-	-	-	-	+	-	-	++	++	+
136a	Cheslyn Hay & Great Wyrley	+/-	--	-	-	-	-	+	-	-	-	-	-
137	Cheslyn Hay & Great Wyrley	+/-	--	-	--	-	-	+	-	-	-	-	-

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
138	Cheslyn Hay & Great Wyrley	+/-	-	-	-	-	-	+	-	-	++	++	-
SAD139	Cheslyn Hay & Great Wyrley	+/-	-	-	-	-	-	+	-	-	-	++	-
SAD141	Cheslyn Hay & Great Wyrley	+/-	+	-	0	-	-	+	-	-	++	++	+
440	Cheslyn Hay & Great Wyrley	+/-	+	-	-	0	-	+	-	-	-	++	-
489	Cheslyn Hay & Great Wyrley	+/-	--	-	-	-	-	+	-	-	-	++	-
491	Cheslyn Hay & Great Wyrley	+/-	-	-	0	-	+	+	-	-	++	-	--
523	Cheslyn Hay & Great Wyrley	+/-	+	-	-	0	-	+	-	-	-	++	+
525	Cheslyn Hay & Great Wyrley	+/-	-	-	--	-	-	+	-	-	-	-	-
526	Cheslyn Hay & Great Wyrley	+/-	-	-	--	-	-	+	-	-	-	--	-
536a	Cheslyn Hay & Great Wyrley	+/-	-	-	--	-	-	+	-	-	-	-	-
536b	Cheslyn Hay & Great Wyrley	+/-	+	-	--	-	-	+	-	-	-	-	-
638	Cheslyn Hay & Great Wyrley	+/-	+	-	0	-	+	+	-	-	++	-	--
696	Cheslyn Hay & Great Wyrley	+/-	--	-	--	-	-	+	-	-	-	--	-
704	Cheslyn Hay & Great Wyrley	+/-	+	-	0	-	+	+	-	-	-	++	-
730	Cheslyn Hay & Great Wyrley	+/-	-	-	-	-	+	+	-	-	-	++	--
741	Cheslyn Hay & Great Wyrley	+/-	-	-	-	-	-	+	-	-	++	++	+
082	Coven	+/-	+	-	-	-	-	+	-	-	-	-	-
082a	Coven	+/-	+	-	-	-	-	+	-	-	-	-	+
084a	Coven	+/-	-	-	--	-	-	+	-	0	-	--	-
085	Coven	+/-	-	-	-	-	-	+	-	-	-	-	-
087	Coven	+/-	+	-	-	-	-	+	-	-	-	-	-
615	Coven	+/-	-	-	-	-	-	+	-	-	-	--	-
618	Coven	+/-	+	-	--	-	-	+	-	0	-	-	+
739	Coven	+/-	+	-	0	-	+	+	-	-	-	-	--
029	Dunston	+/-	--	-	-	-	-	+	-	-	-	-	--
029a	Dunston	+/-	+	-	-	-	-	+	-	-	-	-	-
487	Dunston	+/-	-	-	-	-	-	+	-	-	-	-	-

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
588	Dunston	+/-	--	-	-	-	-	+	-	-	-	--	-
150	Essington	+/-	-	-	--	-	-	+	-	-	-	--	+
151/662	Essington	+/-	-	-	--	-	-	+	-	-	-	--	-
154	Essington	+/-	+	-	--	-	-	+	-	-	-	--	+
157	Essington	+/-	+	-	0	0	-	+	-	-	-	-	+
160	Essington	+/-	--	-	--	-	-	+	-	-	-	--	+
163	Essington	+/-	--	-	--	-	-	+	-	0	-	-	+
163a	Essington	+/-	-	-	--	-	-	+	-	0	-	--	-
163b	Essington	+/-	+	-	--	-	-	+	-	0	-	-	-
164	Essington	+/-	-	-	--	-	-	+	-	0	-	--	+
164a	Essington	+/-	+	-	--	-	-	+	-	0	-	-	+
165	Essington	+/-	--	-	--	-	-	+	-	-	-	--	+
166	Essington	+/-	+	-	--	-	-	+	-	-	-	--	+
392	Essington	+/-	--	-	--	-	-	+	-	0	-	++	+
393	Essington	+/-	+	-	-	-	-	+	-	-	-	-	+
471	Essington	+/-	+	-	--	0	-	+	-	-	-	-	-
486a/b	Essington	+/-	--	-	--	-	-	+	-	-	-	--	+
486c	Essington	+/-	--	-	--	-	-	+	-	-	-	-	+
520	Essington	+/-	--	-	--	-	-	+	-	-	-	++	-
679	Essington	+/-	--	-	--	-	-	+	-	0	-	-	+
102	Featherstone	+/-	-	-	--	-	-	+	-	-	-	--	+
SAD168	Featherstone	+/-	+	-	-	-	+	+	-	-	-	-	-
169	Featherstone	+/-	+	-	--	0	-	+	-	-	-	-	+
170	Featherstone	+/-	--	-	-	-	-	+	-	-	-	-	-
172	Featherstone	+/-	-	-	--	-	-	+	-	-	-	--	-
204	Featherstone	+/-	+	-	--	-	-	+	-	-	-	--	+
206	Featherstone	+/-	+	-	--	-	-	+	-	-	-	--	+
396	Featherstone	+/-	-	-	--	-	-	+	-	-	-	--	-
397	Featherstone	+/-	-	-	-	-	-	+	-	-	-	-	-
527	Featherstone	+/-	--	-	--	-	-	+	-	-	-	--	+
537/537a	Featherstone	+/-	--	-	--	-	-	+	-	-	-	-	+
646a/b	Featherstone	+/-	--	-	--	-	-	+	-	-	-	-	+
742	Featherstone	+/-	+	-	-	-	-	+	-	-	-	-	--
743	Featherstone	+/-	-	-	-	-	-	+	-	-	-	-	-
016	Huntington	+/-	-	-	-	-	-	+	-	-	-	-	-
017	Huntington	+/-	+	-	--	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
022	Huntington	+/-	+	-	--	0	-	+	-	-	-	--	-
591	Huntington	+/-	+	-	--	0	-	+	-	-	-	-	-
592	Huntington	+/-	+	-	--	-	-	+	-	-	-	-	-
732	Huntington	+/-	--	-	--	0	-	+	-	-	-	-	-
272	Kinver	+/-	+	+/-	--	-	-	+	-	-	-	-	-
273	Kinver	+/-	+	+/-	--	-	-	+	-	-	-	-	-
274	Kinver	+/-	+	+/-	-	-	-	+	-	-	-	-	-
SAD274	Kinver	+/-	+	+/-	-	-	-	+	-	-	-	-	-
409	Kinver	+/-	+	+/-	--	-	-	+	-	-	-	-	-
546	Kinver	+/-	+	+/-	--	-	-	+	-	-	-	-	-
549	Kinver	+/-	+	+/-	--	-	-	+	-	-	-	-	-
576	Kinver	+/-	-	+/-	--	-	-	+	-	-	-	-	-
249	Pattingham	+/-	--	-	--	-	-	+	-	-	-	-	-
250	Pattingham	+/-	+	+/-	--	-	-	+	-	-	-	-	-
251	Pattingham	+/-	+	+/-	-	-	-	+	-	-	-	-	-
252	Pattingham	+/-	-	-	--	-	-	+	-	-	-	-	-
253	Pattingham	+/-	+	+/-	--	-	-	+	-	-	-	-	-
255	Pattingham	+/-	-	+/-	-	-	-	+	-	-	-	-	-
257	Pattingham	+/-	+	+/-	--	-	-	+	-	-	-	-	-
400	Pattingham	+/-	--	+/-	--	-	-	+	-	-	-	-	-
401	Pattingham	+/-	+	-	--	-	-	+	-	-	-	-	-
421	Pattingham	+/-	+	-	--	-	-	+	-	-	-	-	-
005	Penkrige	+/-	-	-	-	-	-	+	-	-	-	++	-
006	Penkrige	+/-	-	-	-	-	-	+	-	-	-	-	-
010	Penkrige	+/-	--	-	--	-	-	+	-	-	-	--	-
420	Penkrige	+/-	-	-	-	-	-	+	-	-	++	++	+
430a	Penkrige	+/-	+	-	--	-	-	+	-	-	-	--	-
430b	Penkrige	+/-	+	-	--	-	-	+	-	-	-	--	-
584	Penkrige	+/-	--	-	--	-	-	+	-	-	-	--	-
585	Penkrige	+/-	--	-	--	-	-	+	-	-	-	-	--
585a	Penkrige	+/-	--	-	--	-	-	+	-	-	-	-	--
665	Penkrige	+/-	--	-	--	-	-	+	-	-	-	-	--
711	Penkrige	+/-	-	-	--	-	-	+	-	--	++	+	--
350c	Penn & Lower Penn	+/-	--	+/-	--	-	-	+	-	-	-	-	-
350d	Penn & Lower Penn	+/-	--	+/-	--	-	-	+	-	-	-	-	-

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
494a	Penn & Lower Penn	+/-	-	-	--	-	-	+	-	0	-	-	-
494b	Penn & Lower Penn	+/-	-	-	--	-	-	+	-	0	-	-	-
559	Penn & Lower Penn	+/-	+	+/-	--	-	-	+	-	-	-	--	-
561	Penn & Lower Penn	+/-	+	+/-	--	-	-	+	-	-	-	-	-
573	Penn & Lower Penn	+/-	-	-	--	-	-	+	-	-	-	--	-
579	Penn & Lower Penn	+/-	--	+/-	--	-	-	+	-	-	-	-	--
582	Penn & Lower Penn	+/-	--	+/-	--	-	-	+	-	-	-	++	-
710	Penn & Lower Penn	+/-	-	+/-	--	-	-	+	-	0	-	-	-
238	Perton	+/-	-	+/-	--	-	-	+	-	-	-	--	-
239	Perton	+/-	-	+/-	-	-	-	+	-	-	-	--	-
241	Perton	+/-	+	+/-	--	-	-	+	-	-	-	-	-
243	Perton	+/-	--	+/-	--	-	-	+	-	-	-	-	-
245	Perton	+/-	-	-	-	-	+	+	-	-	-	--	--
246a	Perton	+/-	--	-	--	-	-	+	-	-	-	--	-
260	Perton	+/-	+	+/-	--	-	-	+	-	-	-	--	-
402	Perton	+/-	+	+/-	-	-	-	+	-	-	-	-	-
407	Perton	+/-	-	-	--	-	-	+	-	-	-	--	-
454	Perton	+/-	--	+/-	--	-	-	+	-	-	-	-	-
504	Perton	+/-	+	+/-	--	-	-	+	-	-	-	-	-
505	Perton	+/-	+	+/-	-	-	-	+	-	-	-	-	-
506	Perton	+/-	--	+/-	--	-	-	+	-	-	-	-	-
705	Perton	+/-	-	+/-	--	-	-	+	-	-	-	--	-
339	Sedgley	+/-	-	+/-	--	-	-	+	-	-	-	++	-
548	Sedgley	+/-	--	-	--	-	-	+	-	0	-	-	-
560	Sedgley	+/-	+	-	--	-	-	+	-	-	-	++	-
566	Sedgley	+/-	-	-	--	-	-	+	-	-	-	-	-
567	Sedgley	+/-	-	-	--	-	-	+	-	0	-	++	-
358	Seisdon	+/-	+	+/-	--	-	-	+	-	0	-	--	-
359	Seisdon	+/-	-	-	--	-	-	+	-	-	-	--	-
671	Seisdon	+/-	--	+/-	--	-	-	+	-	-	-	--	-
702	Seisdon	+/-	-	+/-	--	-	-	+	-	0	-	--	-
181	Shareshill	+/-	+	-	--	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
183	Shareshill	+/-	+	-	--	0	-	+	-	-	-	-	-
184	Shareshill	+/-	-	-	-	-	-	+	-	0	-	-	-
185	Shareshill	+/-	+	-	-	0	-	+	-	-	-	-	-
036a	Stafford	+/-	--	-	--	-	-	+	-	--	-	--	-
036c	Stafford	+/-	+	-	--	-	-	+	-	-	-	++	-
312a	Swindon	+/-	+	+/-	--	-	-	+	-	-	-	-	-
313	Swindon	+/-	+	-	--	-	-	+	-	-	-	-	-
SAD313	Swindon	+/-	+	+/-	-	-	-	+	-	-	-	-	-
314	Swindon	+/-	+	-	--	-	-	+	-	-	-	-	-
315	Swindon	+/-	-	-	--	-	-	+	-	-	-	-	-
412	Swindon	+/-	-	+/-	-	-	-	+	-	-	-	-	-
437	Swindon	+/-	-	+/-	--	-	-	+	-	-	-	-	-
682	Swindon	+/-	-	+/-	--	-	-	+	-	-	-	-	-
717	Swindon	+/-	-	+/-	--	-	-	+	-	-	-	-	-
718	Swindon	+/-	-	+/-	--	-	-	+	-	-	-	-	-
327	Trysull	+/-	+	+/-	--	-	-	+	-	-	--	-	--
328	Trysull	+/-	+	+/-	--	-	-	+	-	-	-	-	--
329	Trysull	+/-	-	+/-	--	-	-	+	-	-	-	-	--
544	Trysull	+/-	--	+/-	--	-	-	+	-	-	-	-	--
558	Trysull	+/-	-	+/-	--	-	-	+	-	-	-	-	--
368	Wall Heath	+/-	--	-	--	-	-	+	-	-	-	--	-
370	Wall Heath	+/-	--	-	--	-	-	+	-	-	-	--	-
577	Wall Heath	+/-	+	+/-	--	-	-	+	-	-	-	--	-
684	Wall Heath	+/-	-	+/-	--	-	-	+	-	-	-	--	-
090	Wheaton Aston	+/-	--	-	--	-	-	+	-	-	-	-	-
091	Wheaton Aston	+/-	--	-	--	-	-	+	-	-	-	-	-
092	Wheaton Aston	+/-	+	-	-	0	-	+	-	-	-	-	-
094	Wheaton Aston	+/-	+	-	--	-	-	+	-	-	-	-	-
377/093	Wheaton Aston	+/-	+	-	-	0	-	+	-	-	-	-	-
378	Wheaton Aston	+/-	-	-	--	0	-	+	-	-	-	-	-
378a	Wheaton Aston	+/-	-	-	--	0	-	+	-	-	-	-	-
379	Wheaton Aston	+/-	--	-	-	0	-	+	-	-	-	-	-
SAD379	Wheaton Aston	+/-	+	-	-	0	-	+	-	-	-	-	-
382	Wheaton Aston	+/-	-	-	--	-	-	+	-	-	-	-	-
426a	Wheaton Aston	+/-	+	-	-	-	-	+	-	-	-	-	-
426b	Wheaton Aston	+/-	--	-	--	-	-	+	-	-	-	-	-

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
608	Wheaton Aston	+/-	-	-	--	0	-	+	-	-	-	-	-
610	Wheaton Aston	+/-	--	-	--	0	-	+	-	-	-	-	-
614	Wheaton Aston	+/-	--	-	-	0	-	+	-	-	-	-	-
619	Wheaton Aston	+/-	+	-	--	0	-	+	-	-	-	-	-
364	Wollaston & Wordsley	+/-	+	-	--	-	-	+	-	-	-	++	-
365	Wollaston & Wordsley	+/-	-	-	--	-	-	+	-	-	-	-	-
654	Wollaston & Wordsley	+/-	+	-	--	-	-	+	-	-	-	--	-
655	Wollaston & Wordsley	+/-	+	-	--	-	-	+	-	-	-	--	-
673	Wollaston & Wordsley	+/-	+	+/-	--	-	-	+	-	-	-	++	-
280	Wombourne	+/-	--	-	-	-	-	+	-	--	-	++	-
283	Wombourne	+/-	--	-	--	-	-	+	-	-	-	-	-
284	Wombourne	+/-	--	+/-	--	-	-	+	-	-	-	++	-
285	Wombourne	+/-	--	-	-	-	-	+	-	-	-	-	-
286	Wombourne	+/-	+	+/-	-	-	-	+	-	-	-	++	-
298	Wombourne	+/-	-	+/-	-	-	-	+	-	-	-	-	-
305	Wombourne	+/-	-	+/-	-	-	-	+	-	-	-	-	-
306	Wombourne	+/-	-	-	--	-	-	+	-	-	-	++	-
309	Wombourne	+/-	--	-	--	-	-	+	-	-	-	--	-
310a	Wombourne	+/-	--	-	--	-	+	+	-	-	-	-	--
310b	Wombourne	+/-	-	-	-	-	+	+	-	-	-	-	--
335a	Wombourne	+/-	+	+/-	-	-	-	+	-	-	-	--	-
335b	Wombourne	+/-	+	+/-	-	-	-	+	-	-	-	--	-
416	Wombourne	+/-	+	-	-	-	-	+	-	-	-	-	-
416a	Wombourne	+/-	+	-	--	-	-	+	-	-	-	-	-
417	Wombourne	+/-	+	+/-	-	-	-	+	-	-	-	-	-
438	Wombourne	+/-	-	-	-	-	-	+	-	-	-	++	-
458	Wombourne	+/-	-	-	-	-	-	+	-	-	-	-	-
459	Wombourne	+/-	--	+/-	-	-	-	+	-	-	-	++	-
460	Wombourne	+/-	-	-	0	-	+	+	-	-	-	-	--
463a	Wombourne	+/-	+	-	--	-	-	+	-	-	-	++	-
463b	Wombourne	+/-	-	-	--	-	-	+	-	-	-	++	-
463c	Wombourne	+/-	+	-	--	-	-	+	-	-	-	++	-
463d	Wombourne	+/-	-	-	--	-	-	+	-	-	-	++	-

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
477	Wombourne	+/-	+	+/-	-	-	-	+	-	-	-	++	-
479a	Wombourne	+/-	+	+/-	-	-	-	+	-	-	-	--	-
554	Wombourne	+/-	--	+/-	-	-	-	+	-	-	-	-	-
562/415	Wombourne	+/-	+	+/-	-	-	-	+	-	-	-	++	-
626	Wombourne	+/-	-	+/-	--	-	-	+	-	-	-	-	-
627	Wombourne	+/-	-	+/-	--	-	-	+	-	-	-	-	-
628	Wombourne	+/-	+	+/-	--	-	-	+	-	-	-	-	-
629	Wombourne	+/-	+	-	--	-	-	+	-	-	-	-	-
701	Wombourne	+/-	+	+/-	--	-	-	+	-	-	-	++	-
707	Wombourne	+/-	+	+/-	--	-	-	+	-	-	-	--	-
708	Wombourne	+/-	-	-	--	-	-	+	-	-	-	-	-
738	Wombourne	+/-	-	+/-	-	-	-	+	-	-	-	-	--
E04a	Employment Sites	+/-	+	-	-	-	-	0	-	-	-	0	++
E04b	Employment Sites	+/-	+	-	-	-	-	0	-	-	-	0	++
E05	Employment Sites	+/-	+	-	-	-	-	0	-	-	-	0	++
E14	Employment Sites	+/-	-	-	0	-	-	0	-	-	-	0	++
E15a	Employment Sites	+/-	--	-	--	-	+	0	-	-	-	0	++
E18	Employment Sites	+/-	--	-	-	-	-	0	-	-	-	0	++
E20a	Employment Sites	+/-	-	-	-	-	-	0	-	0	-	0	++
E20b	Employment Sites	+/-	+	-	-	-	-	0	-	-	-	0	++
E24	Employment Sites	+/-	--	-	-	-	-	0	-	0	-	0	++
E30	Employment Sites	+/-	+	-	-	-	-	0	-	-	-	0	++
E31	Employment Sites	+/-	+	-	--	-	-	0	-	-	-	0	++
E32	Employment Sites	+/-	-	-	--	-	-	0	-	-	-	0	++
E33	Employment Sites	+/-	--	-	--	-	-	0	-	-	-	0	++
E37a/b	Employment Sites	+/-	--	-	--	-	-	0	-	-	-	0	++
E38	Employment Sites	+/-	+	-	--	-	-	0	-	-	-	0	++
E39	Employment Sites	+/-	+	-	--	-	-	0	-	-	-	0	++
E41	Employment Sites	+/-	--	-	--	-	-	0	-	-	-	0	++
E42	Employment Sites	+/-	--	-	--	-	-	0	-	-	-	0	++
E43	Employment Sites	+/-	--	-	--	-	-	0	-	-	-	0	++
E44	Employment Sites	+/-	--	-	-	-	-	0	-	-	-	0	++
E45	Employment Sites	+/-	--	-	--	-	-	0	-	-	-	0	++
E46	Employment Sites	+/-	--	-	--	-	-	0	-	-	-	0	++
E47	Employment Sites	+/-	+	-	--	-	-	0	-	-	-	0	++
E48	Employment Sites	+/-	-	-	--	-	-	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
E49	Employment Sites	+/-	+	-	--	-	-	0	-	-	-	0	++
E50	Employment Sites	+/-	+	-	-	-	-	0	-	-	-	0	++
E51a	Employment Sites	+/-	+	-	--	-	-	0	-	0	-	0	++
E51b	Employment Sites	+/-	+	-	--	-	-	0	-	-	-	0	++
E52	Employment Sites	+/-	+	-	--	-	-	0	-	-	-	0	++
E53	Employment Sites	+/-	--	-	--	-	-	0	-	-	-	0	++
E54	Employment Sites	+/-	+	-	--	-	-	0	-	-	-	0	++
E55	Employment Sites	+/-	--	-	--	-	+	0	-	-	-	0	++
E56	Employment Sites	+/-	--	--	--	-	-	0	-	-	-	0	++
E57	Employment Sites	+/-	--	-	-	-	-	0	-	-	-	0	++
E58a	Employment Sites	+/-	-	-	--	-	-	0	-	-	-	0	++
E58b	Employment Sites	+/-	-	-	-	-	-	0	-	-	-	0	++
E59	Employment Sites	+/-	--	-	--	0	-	0	-	-	-	0	++
E60a	Employment Sites	+/-	--	-	--	-	-	0	-	-	-	0	++
E60b	Employment Sites	+/-	--	-	--	-	-	0	-	-	-	0	++
E61a	Employment Sites	+/-	--	-	--	-	-	0	-	-	-	0	++
E61b	Employment Sites	+/-	--	-	--	-	-	0	-	-	-	0	++
GT01	Gypsy & Traveller	+/-	+	-	--	-	+	+/-	-	-	-	--	--
GT02	Gypsy & Traveller	+/-	--	-	--	0	+	+/-	-	0	-	--	--
GT03	Gypsy & Traveller	+/-	+	-	-	0	+	+/-	-	0	-	--	--
GT04	Gypsy & Traveller	+/-	--	-	--	-	-	+/-	-	-	-	--	+
GT05	Gypsy & Traveller	+/-	+	-	--	-	+	+/-	-	-	-	--	+
GT06	Gypsy & Traveller	+/-	+	-	--	-	+	+/-	-	-	-	--	+
GT07	Gypsy & Traveller	+/-	+	-	--	-	+	+/-	-	-	-	--	--
GT08	Gypsy & Traveller	+/-	--	-	--	-	+	+/-	-	-	-	--	+
GT09	Gypsy & Traveller	+/-	-	-	0	-	+	+/-	-	0	-	--	+
GT10	Gypsy & Traveller	+/-	-	-	0	-	+	+/-	-	-	-	--	+
GT11	Gypsy & Traveller	+/-	-	-	0	-	+	+/-	-	-	-	--	+
GT12	Gypsy & Traveller	+/-	--	-	--	-	-	+/-	-	0	-	--	--
GT13	Gypsy & Traveller	+/-	+	-	--	0	+	+/-	-	-	-	++	--
GT14	Gypsy & Traveller	+/-	-	-	--	-	-	+/-	-	-	-	--	+
GT15	Gypsy & Traveller	+/-	-	-	0	-	+	+/-	-	-	-	-	-
GT16	Gypsy & Traveller	+/-	+	-	0	-	+	+/-	-	-	-	-	-
GT17	Gypsy & Traveller	+/-	+	-	-	0	-	+/-	-	-	-	--	--
GT18	Gypsy & Traveller	+/-	+	+/-	-	-	+	+/-	-	-	-	++	--
GT19	Gypsy & Traveller	+/-	-	-	--	-	+	+/-	-	-	-	--	+

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
GT20	Gypsy & Traveller	+/-	+	-	-	-	-	+/-	-	0	-	--	+
GT23	Gypsy & Traveller	+/-	+	-	--	-	+	+/-	-	-	-	--	+
GT24	Gypsy & Traveller	+/-	-	-	-	0	-	+/-	-	-	-	-	-
GT27	Gypsy & Traveller	+/-	--	-	-	-	-	+/-	-	-	-	--	+
GT30	Gypsy & Traveller	+/-	--	+/-	--	-	+	+/-	-	-	-	--	--
GT32	Gypsy & Traveller	+/-	--	-	-	-	+	+/-	-	-	-	++	--
GT33	Gypsy & Traveller	+/-	+	-	--	-	+	+/-	-	0	-	--	--
GT34	Gypsy & Traveller	+/-	+	-	--	-	+	+/-	-	0	-	--	-
GT35	Gypsy & Traveller	+/-	+	-	-	0	-	+/-	-	-	-	-	+
GT36	Gypsy & Traveller	+/-	-	-	--	0	+	+/-	-	0	-	--	-
TSP01	Gypsy & Traveller	+/-	+	-	-	-	+	+/-	-	-	-	-	+
SCC1	Gypsy & Traveller	+/-	-	-	-	0	-	+/-	-	-	-	--	--
SCC2	Gypsy & Traveller	+/-	--	-	-	-	-	+/-	-	-	-	--	-
SCC3	Gypsy & Traveller	+/-	--	-	--	-	-	+/-	-	-	-	--	+
SCC4	Gypsy & Traveller	+/-	--	-	--	-	-	+/-	-	-	-	--	-
SCC5	Gypsy & Traveller	+/-	--	-	--	-	-	+/-	-	--	-	--	-
SCC6	Gypsy & Traveller	+/-	--	0	--	-	-	+/-	-	-	-	-	-
SCC7	Gypsy & Traveller	+/-	--	0	-	-	-	+/-	-	-	-	-	--
SCC8	Gypsy & Traveller	+/-	--	0	--	-	-	+/-	-	-	-	-	--
SCC9	Gypsy & Traveller	+/-	-	0	--	-	-	+/-	-	0	-	++	-
SCC10	Gypsy & Traveller	+/-	+	0	-	-	-	+/-	-	-	-	-	--

H.3 Mitigating effects of LPR policies

H.3.1 Introduction

- H.3.1.1 A total of 54 policies are proposed as part of the LPR. The requirements set out in the five Strategic 'Development Strategy' Policies and 43 other Strategic / Development Management policies (see **Appendix J**) would be anticipated to improve the sustainability performance of many of the reasonable alternative site assessments through the reduction or elimination of adverse effects and optimising positive effects.
- H.3.1.2 It should be noted that the requirements of the six 'Site Allocation' Policies, including those for the strategic development sites (Policies SA1 and SA2) and the over-arching master planning policy for the strategic development sites (Policy MA1) set out in the LPR have not informed the post-mitigation assessments as these do not relate to all reasonable alternative sites. Policies SA3, SA4 and SA5 have also not been considered in the post-mitigation assessment as they set out the allocations for housing, Gypsy and Traveller, and employment uses respectively, and as such will not have any mitigating influence.
- H.3.1.3 **Tables H.3.1 to H.3.12** below set out the potential adverse impacts that have been identified through the assessment of sites pre-mitigation for each SA Objective, as presented in **Table H.2.1**, and indicate which, if any, of the emerging LPR policies would be likely to mitigate these effects.
- H.3.1.4 The assessment of the sustainability performance of sites post-mitigation, taking into account the mitigating effects of the LPR policies, is summarised in the matrix in **Table H.4.1**.

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

Identified adverse impact	Potential mitigating influence of LPR policies	Commentary: Will the policies mitigate the identified adverse effects?
<p>Increased GHG emissions</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.</p> <p>Policy HC13 'Parking Provision' includes requirements for electric vehicle charging facilities for development proposals to meet.</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', may also encourage residents to enjoy the local environment and reduce the need to travel for exercise, dog walking etc.</p> <p>Policy EC1 'Sustainable Economic Growth' includes wording to promote active travel measures and the creation/enhancement of multifunctional green spaces and the enhancement of the GI Network. Similarly, Policy EC3 'Employment and Skills' encourages more sustainable commuting patterns.</p> <p>Policies EC8 'Retail' and EC9 'Protecting Community Services and Facilities' seek to maintain the vitality of village centres in existing settlements and in doing so may reduce the need for residents to travel by car to access facilities.</p> <p>Policy EC12 'Sustainable Transport' sets out a wide range of measures to improve sustainable travel choices, including strengthening bus and rail services and their connections, encouraging walking and</p>	<p>As set out in the CCAM report³, better standards for new buildings, combined with grid decarbonisation and switching to Ultra-Low Emission Vehicles, could decrease total emissions by over 50% compared with 2017 levels in South Staffordshire. Although these policies would be likely to reduce the GHG emissions associated with development to some extent, the policies would not be expected to fully mitigate the increased carbon emissions expected as a result of the large scale of development proposed through the LPR during the Plan period.</p>

³ AECOM (2020) 'Climate Change Adaptation and Mitigation: Final Report October 2020' Available at https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Planning%20Policy/New%20Stafford%20Borough%20Local%20Plan%202020-2040/Evidence%20Base%20Documents/Staffordshire_Final%20Report_Rev03%20%28Updates%29_2020-10-16_Accessibility_Comp....pdf [Date accessed: 14/11/23]

Identified adverse impact	Potential mitigating influence of LPR policies	Commentary: Will the policies mitigate the identified adverse effects?
	<p>cycling, and improving availability of electric vehicle charging points.</p> <p>Policy NB1 'Protecting, Enhancing and Expanding Natural Assets' seeks to strengthen these assets. Vegetation provides several ecosystem services, including carbon storage as well as cooling/shading effects.</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>	

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

Identified adverse impacts	Potential Mitigating influence of LPR policies	Commentary: Will the policies mitigate the identified adverse effects?
<p>Risk of fluvial or surface water flooding</p>	<p>Policy NB7 'Managing Flood Risk, Sustainable Drainage Systems & Water Quality' seeks to manage fluvial and surface water flood risk, through the requirement for site-specific Flood Risk Assessments and surface water drainage strategies for all developments. Site-specific flood risk assessments, such as the sequential and exception tests, should be in accordance with national requirements and take account of the latest climate change allowances. 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>SSDC has also prepared a Strategic Flood Risk Assessment (SFRA) and is consulting with the Environment Agency through the LPR's preparation to ensure the sequential test is properly followed. Furthermore, SSDC will, where possible, avoid putting vulnerable uses within Flood Zones 2 and 3, ensuring any sites allocated containing areas of Flood Zones 2 and 3 give these areas over to water compatible uses (e.g., green infrastructure).</p> <p>The SFRA process combined with these policies would be expected to mitigate potential adverse impacts associated with development in areas at risk of fluvial or surface water flooding.</p>

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

Identified adverse impacts	Potential mitigating influence of Draft LPR policies	Commentary: Will the policies mitigate the identified adverse effects?
<p>Threats or pressures to Habitats sites</p>	<p>Policy NB3 'Cannock Chase SAC' will support the recommendations of the SAC Partnership which has developed a strategy to mitigate the effects of development on Cannock Chase SAC. SSDC will produce a separate guidance note or SPD detailing mitigation requirements. The policy will also link to the need to address potential air quality threats to other SACs.</p> <p>An HRA is being prepared which will set out the Zones of Influence (ZoI) associated with these SACs and identify any likely significant effects as a consequence of the emerging Local Plan. Potential effects on SACs can relate to increases in recreational pressure, urbanisation effects, changes to air quality and changes to hydrology, amongst others. The ZoI for effects on a SAC can be extensive, for example, as a result of changes to air quality as a consequence of commuting patterns. The ZoI and nature of any effects and the mitigation of those effects are evaluated in the HRA.</p>	<p>Whilst Policy NB3 supports the recommendations of the Cannock Chase SAC Partnership in terms of mitigating the effects of development on Cannock Chase SAC, at the time of undertaking this assessment there is some uncertainty regarding the potential effects of the proposed housing allocations on Habitats sites. The Publication Draft HRA⁴ concluded that adverse effects on integrity from recreation and water issues could be ruled out, alone or in combination. However, adverse effects on integrity relating to air quality could not be ruled out at this stage and ongoing traffic data collection is required in order to complete the HRA. Subject to the findings of the emerging HRA and mitigation agreements with Natural England, it is expected that the policies would minimise adverse effects on Habitats sites.</p>
<p>Threats or pressures to nationally designated sites (SSSI and NNR)</p>	<p>Policy NB1 'Protecting, Enhancing And Expanding Natural Assets' supports proposals "<i>which protect and enhance the quality of the natural environment</i>" and avoid harm to sites of national importance, including SSSIs and NNRs, whether alone or in combination with other developments.</p>	<p>The LPR policies would be expected to mitigate potential adverse impacts on nationally designated sites (SSSIs) and deliver a net gain in</p>

⁴ Footprint Ecology (2022) Habitats Regulations Assessment of the South Staffordshire Local Plan Review 2018-2038 (Publication Plan, Regulation 19) – Publication Draft, 10th October 2022. Available at: https://www.sstaffs.gov.uk/sites/default/files/2023-02/03_hra_october_2022.pdf [Date accessed: 21/02/24]

Identified adverse impacts	Potential mitigating influence of Draft LPR policies	Commentary: Will the policies mitigate the identified adverse effects?
	<p>Policy NB2 'Biodiversity' seeks to ensure that opportunities are taken to create, enhance and manage wildlife habitats and network and requires all new development provides a minimum of 10% biodiversity net gain, with likely benefits to the wider ecological network including SSSIs and NNRs.</p> <p>Policy NB3 'Cannock Chase SAC' aims to protect the integrity of Cannock Chase SAC, which is underpinned by SSSIs.</p>	<p>biodiversity for all development sites.</p>
<p>Threats or pressures to locally designated biodiversity sites and priority habitats</p>	<p>Policy NB1 'Protecting, Enhancing and Expanding Natural Assets' sets out protection for locally designated sites (SBIs and LNRs) as well as habitats and priority species (including ancient woodland, ancient and veteran trees and historic parkland) in accordance with the provisions of the relevant statutory and national policy.</p> <p>Policy NB2 'Biodiversity' will require development proposals to consider biodiversity as part of any proposal and supports the inclusion of features such as green walls, roofs, bat and bird boxes. All new development will be required to deliver a 10% biodiversity net gain, measured in accordance with Defra's biodiversity metric.</p> <p>Policy HC9 'Gypsy, Traveller and Travelling Showpeople' will seek to ensure that Gypsy and Traveller proposals demonstrate a minimum 10% biodiversity net gain in accordance with Policy NB2.</p> <p>Policy NB9 'Canal Network' supports proposals which conserve and enhance the wildlife value of canals.</p> <p>Policy HC19 'Green Infrastructure' encourages development proposals to maximise on-site GI, including opportunities to connect and enrich biodiversity and wildlife habitats.</p>	<p>The LPR policies would be expected to mitigate potential adverse impacts on locally designated biodiversity sites and deliver a net gain in biodiversity for all development sites.</p>

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

Identified adverse impacts	Potential mitigating influence of LPR policies	Commentary: Will the policies mitigate the identified adverse effects?
<p>Effects on the West Midlands Green Belt</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>Examples of potential mitigation measures are set out in Chapter 8 of the Green Belt Study, including:</p> <ul style="list-style-type: none"> • Use landscaping to help integrate a new Green Belt boundary with the existing edge, aiming to maximise consistency over a longer distance; • Strengthen boundary at weak points – e.g. where 'breached' by roads; • Define Green Belt edge using a strong, natural element which forms a visual barrier – e.g. a woodland belt; • Create a transition from urban to rural, using built density, height, materials and landscaping to create a more permeable edge; • Enhance visual openness within the Green Belt; • Preserve/enhance landscape elements which contribute to the setting of historic settlements and views which provide an appreciation of historic setting and special character; • Enhance access within the Green Belt; • Improve management practices to enhance countryside character; • Design and locate buildings, landscaping and green spaces to minimise intrusion on settlement settings; • Maintain/create separation between existing washed-over settlement and new inset settlement; • Design road infrastructure to limit perception of increased urbanisation associated with new development; and • Use sustainable drainage features to define/enhance separation between settlement and countryside. <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>While a range of mitigation measures are set out in the Study to reduce levels of harm, the negative effects of the loss of the Green Belt and/or land deemed to be sensitive to development are unlikely to be fully mitigated by these measures. Therefore, it is considered likely there would be residual negative effects in relation to Green Belt harm as consequence of the release of these sites for development.</p>

Identified adverse impacts	Potential mitigating influence of LPR policies	Commentary: Will the policies mitigate the identified adverse effects?
<p>Effects on the setting to Cannock Chase AONB</p>	<p>Policy NB4 'Landscape Character' seeks to ensure that development proposals would not result in adverse impacts on landscape character and sets out measures to protect and enhance Cannock Chase AONB and its setting, in accordance with national policy and any additional guidance.</p> <p>Other LPR policies including DS1 'Green Belt', HC2 'Housing Density', HC6 'Rural Exception Sites' and EC1 'Sustainable Economic Growth' include provisions which would help to minimise some adverse impacts on landscape character, including the special qualities of Cannock Chase AONB and proportionate protection of visual amenity and views.</p>	<p>LPR policies, in particular Policy NB4, would be likely to mitigate significant adverse impacts on the setting and special qualities associated with development located within the setting of the Cannock Chase AONB.</p>
<p>Threaten or result in the loss of rural and locally distinctive landscape character</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.</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>Other LPR policies including DS1 'Green Belt', HC2 'Housing Density', HC6 'Rural Exception Sites' and EC1 'Sustainable Economic Growth' include provisions which would help to minimise some adverse impacts on landscape character, including proportionate protection of visual amenity and views.</p>	<p>The nature of the effects of development on the landscape is highly dependent on local site circumstances and the nature of the development proposals. The LPR policies have the potential to mitigate some potential adverse effects on landscape character and visual amenity identified in this assessment, through sensitive masterplanning and design. However, they would not be expected to fully mitigate changes to landscape character, particularly on greenfield sites.</p>
<p>Effects on Country Parks</p>	<p>While Country Parks are not specifically referred to in the policies for protection purposes, it is likely that the requirements of Policy NB4 'Landscape Character' would serve to take into account the character of and views from publicly accessible recreational spaces, such as Cannock Chase Country Park and Baggeridge Country Park.</p> <p>Additionally, Policy HC19 'Green Infrastructure' seeks to protect, maintain and enhance greenspaces within the Plan area and strengthen green linkages to major areas of open space, including Country Parks.</p>	<p>It is expected that Policies NB4 and HC19 would mitigate potential adverse impacts from development proposals located in close proximity to a Country Park.</p>

Identified adverse impacts	Potential mitigating influence of LPR policies	Commentary: Will the policies mitigate the identified adverse effects?
<p>Change in views from Public Rights of Way/for local residents</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>Other LPR policies including DS1 'Green Belt', HC2 'Housing Density', HC6 'Rural Exception Sites' and EC1 'Sustainable Economic Growth' include provisions which would help to minimise some adverse impacts on landscape character, including proportionate protection of visual amenity and views.</p>	<p>LPR policies would be expected to mitigate significant adverse effects on views.</p>
<p>Increase risk of coalescence and/or urban sprawl</p>	<p>Policies DS1 'Green Belt' and DS3 'Open Countryside' seek to protect the openness of the countryside and only release land for development when necessary and justified as part of a Local Plan Review.</p> <p>Policy HC2 'Housing Density' seeks to achieve 35 dwellings per hectare in developments adjoining Tier 1 settlements and urban extensions in order to achieve an efficient use of land. This would reduce overall land requirements to deliver housing needs.</p> <p>Policy HC6 'Rural Exception Sites' provides the requirements whereby small housing sites can be delivered in sites lying adjacent to Tier 1-4 settlements.</p> <p>Policy EC1 'Sustainable Economic Growth' states that preference should be given to sustainable previously developed land.</p>	<p>LPR policies would help to minimise some adverse impacts on landscape character, however, they would not be expected to fully mitigate the risk of coalescence and urbanisation of the countryside.</p>

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

Identified adverse impact	Potential mitigating influence of Draft DLP policies	Commentary: Will the policies mitigate the identified adverse effects?
<p>Increase in, and exposure to, air pollution (from main road, railway line or AQMA)</p>	<p>Policy HC11 'Protecting Amenity' seeks to protect residential amenity, including in relation to noise and other sources of pollution.</p> <p>Policy HC13 'Parking Provision' also introduces the requirement for electric vehicle charging points and supports electric public transport where appropriate. This would serve to encourage the use of electric vehicles and reduce noise and air pollution to some extent.</p> <p>Policy HC19 'Green Infrastructure', 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>	<p>The 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 or railway lines. However, these policies would not be expected to fully mitigate the adverse impacts relating to pollution associated with some sites in proximity to existing AQMAs or main roads, such as the M6, where baseline air and/or noise pollution levels may be high.</p>
<p>Risk of contamination of groundwater Source Protection Zones and watercourses</p>	<p>Policy NB7 'Managing Flood Risk, Sustainable Drainage Systems & Water Quality' requires major development proposals to deliver sustainable drainage systems and that new development proposals located within Flood Zones 2 and 3 provide a site-specific flood risk assessment and surface water drainage strategies. The policy states that development should not adversely affect the quality or quantity of water, either directly through pollution of surface or ground water or indirectly through the treatments of wastewater.</p> <p>Policy HC19 'Green Infrastructure', 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>The LPR policies could help to minimise potential adverse impacts on watercourses and groundwater quality through protecting the quality of run-off.</p>

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

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

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

Identified adverse impact
No adverse impacts identified for SA Objective 7.

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

Identified adverse impacts	Potential mitigating influence of LP policies	Commentary: Will the policies mitigate the identified adverse
<p>Limited access to healthcare/leisure facilities and services</p>	<p>Policy HC14 'Health Infrastructure' seeks to protect existing healthcare infrastructure and states, "<i>proposals for major residential developments or specialist elderly accommodation must be assessed against the capacity of existing healthcare facilities through engagement with the relevant Clinical Commissioning Group (CCG)</i>, 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>The LPR policies could potentially help to prevent the loss of existing healthcare facilities and improve sustainable access to facilities for some residents, however, the policies would not be expected to fully mitigate the restricted access to healthcare services, in relation to access to NHS hospitals and GP services, for many of the reasonable alternative sites.</p>
<p>Exposure to air/noise pollution (from AQMA/main road)</p>	<p>Policy HC11 'Protecting Amenity' seeks to protect residential amenity in relation to noise and other sources of pollution.</p> <p>Policy HC13 'Parking Provision' 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>	<p>The 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 or railway lines. However, these policies would not be expected to fully mitigate the adverse impacts relating to pollution associated with some sites in proximity to existing AQMAs or main roads, such as the M6, where baseline air and/or noise pollution levels may be high.</p>
<p>Limited access to, and the net loss of, public greenspace</p>	<p>Policy HC17 'Open Space' states that existing open spaces will be protected and will require 0.006 hectares of multi-functional, centrally located open</p>	<p>LPR policies would be expected to ensure new developments provide access to open space,</p>

Identified adverse impacts	Potential mitigating influence of LP policies	Commentary: Will the policies mitigate the identified adverse
	<p>space per dwelling, with the threshold for on-site provision being 33 dwellings or above.</p> <p>Policy HC18 'Sports Facilities and Playing Pitches' states existing sports facilities and playing pitches will be protected and that the provision required from major developments will be determined through the use of the latest Playing Pitch Calculator and Sports Facilities Calculator. An Open Space, Sport and Recreation SPD is proposed.</p> <p>Policy HC19 'Green Infrastructure' 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.</p> <p>Policy HC12 'Space About Dwellings and Internal Space' states that a "<i>reasonable area of communal open space</i>" must be provided for flats and specialist housing, which may help to increase accessibility to open spaces for recreation and reflection for residents of these accommodation types.</p>	<p>playing pitches and GI, and would help to improve access to open spaces across the Plan area.</p>
<p>Limited access to the pedestrian network</p>	<p>Policy EC12 'Sustainable Transport' will commit the District/County Council to preparing Local Walking & Cycling Infrastructure Plan to identify strategic opportunities for walking improvements within the district and will ensure development is designed to promote high quality walking routes, both within sites and linking to nearby services and facilities.</p> <p>Policy HC10 'Design Requirements' seeks to ensure development proposals provide a clear and permeable hierarchy of streets, routes and spaces which may serve to encourage travel in the local area by foot.</p> <p>Policy HC19 'Green Infrastructure' seeks to ensure new development provides multifunctional GI to meet active travel needs, amongst other functions.</p> <p>Policy EC1 'Sustainable Economic Growth' seeks to promote the provision of active travel measures and the creation/enhancement of multifunctional green spaces and the enhancement of the GI Network.</p>	<p>The LPR policies would be expected to mitigate adverse impacts associated with restricted access to the pedestrian network and help to encourage the uptake of these sustainable transport options in order to access community facilities and centres.</p>

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

Identified adverse impact	Potential mitigating influence of LPR policies	Commentary: Will the policies mitigate the identified adverse effects?
<p>Alteration of character or setting of a heritage asset</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. The policy would also ensure that the design of new development reflects the requirements of any Conservation Area Management Plans that are relevant to the site in question.</p> <p>Policy EC5 'Tourism' supports development proposals for tourist accommodation and facilities where they would not adversely affect the character of any nearby heritage assets and their settings.</p>	<p>These policies would be expected to mitigate potentially significant adverse impacts on the local historic environment which may occur as a consequence of the development of the sites, including impacts on Listed Buildings, Conservation Areas, Scheduled Monuments and Registered Parks and Gardens. Potential impacts on underground archaeology are uncertain as the significance of such features may not be known at this time. The requirement for a proportionate assessment should also include the proposals for any required mitigation</p>

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

Identified adverse impacts	Potential mitigating influence of LPR policies	Commentary: Will the policies mitigate the identified adverse effects?
Limited access to public transport	<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 locate residents in closer proximity to public transport, including railway stations.</p> <p>Policy EC12 'Sustainable Transport' will ensure that the Council proactively work with partners to <i>"promote sustainable transport measures and deliver high quality transport infrastructure and links across the district"</i> including bus and rail services.</p> <p>Various other Plan policies include public transport provisions such as HC5 'Specialist Housing', HC13 'Parking Provision', HC14 'Health Infrastructure', HC15 'Education', EC4 'Rural Economy', EC5 'Tourist Accommodation' and EC8 'Retail'.</p>	<p>The LPR policies would be expected to improve the access to sustainable transport options, however, the nature and locations of these improvements is uncertain at this stage of the planning process. It is considered unlikely that the LPR policies would fully mitigate the restricted access to public transport infrastructure in all locations.</p>
Limited access to local services and facilities	<p>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.</p> <p>Policy EC9 'Protecting Community Services and Facilities' seeks to protect and enhance essential communities and facilities, including small local shops and pubs.</p> <p>Policy HC14 'Health Infrastructure' seeks to protect existing healthcare infrastructure.</p>	<p>The LPR policies would be expected to maintain existing local services and facilities as far as possible within the Local Plan process, however, these policies would not be expected to fully mitigate the restricted access to local facilities, in some locations.</p>
Limited access to the pedestrian or cycle network	<p>Policy EC12 'Sustainable Transport' commits to preparing a Local Walking & Cycling Infrastructure Plan to identify strategic opportunities for walking and cycling improvements in the district and seeks to ensure new development is designed to promote high quality walking and cycling routes, both within sites and linking to nearby services and facilities.</p> <p>Policy HC10 'Design Requirements' requires new development to various accessibility and transport related criteria for proposals to meet in order to be supported, requiring new development to accommodate cycle storage and <i>"give safe and</i></p>	<p>The LPR policies would be expected to mitigate adverse impacts associated with restricted access to the pedestrian and cycle networks and help to encourage the uptake of these sustainable transport options in order to access community facilities.</p>

Identified adverse impacts	Potential mitigating influence of LPR policies	Commentary: Will the policies mitigate the identified adverse effects?
	<p><i>convenient ease of movement to all users prioritising pedestrians and cycle users</i>".</p> <p>Policy HC13 'Parking Provision' will ensure safe, weatherproof cycle storage is provided within new developments.</p> <p>Policy HC19 'Green Infrastructure' supports multi-functional GI schemes including "<i>attractive cycle and walkways</i>".</p> <p>Various other Plan policies include active travel provisions such as HC5 'Specialist Housing', HC14 'Health Infrastructure', HC15 'Education', EC1 'Sustainable Economic Growth', EC4 'Rural Economy', EC5 'Tourist Accommodation' and EC8 'Retail'.</p>	
<p>Limited access to the road network</p>	<p>Policy EC12 'Sustainable Transport' states that safe access must be provided.</p> <p>Policy HC9 'Gypsy, Traveller and Travelling Showpeople' seeks to ensure that transit sites are in locations with good access to the strategic highway network.</p> <p>Policy EC4 'Rural Economy' would ensure that approach roads and site access have the capacity to cater for the type and levels of traffic.</p> <p>Policy EC5 'Tourist Accommodation' seeks to provide appropriate, convenient and safe vehicular access.</p>	<p>The LPR policies would be expected to ensure safe access to the road network. It is anticipated that site-specific access matters would be clarified in the plan-making process and without suitable vehicular access SSDC would consider the site to undeliverable.</p>

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

Identified adverse impact	Potential mitigating influence of LPR policies	Commentary: Will the policies mitigate the identified adverse effects?
<p>Limited access to primary and secondary schools</p>	<p>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.</p> <p>Policy EC12 'Sustainable Transport' seeks to promote high quality walking and cycling routes to nearby facilities. This policy could potentially help to improve access to existing schools from sites.</p>	<p>These policies may ensure sufficient capacity of school places and some improvements to routes to schools. However, it is uncertain whether the policies would provide sustainable access to schools, for example through the provision of public transport, across the Plan area as a whole. Potential negative impacts on access to primary and secondary schools are therefore not considered to be fully mitigated by these policies at this stage.</p>

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

Identified adverse impacts	Potential mitigating influence of LPR policies	Commentary: will the policies mitigate the identified adverse effects
<p>Loss of employment floorspace</p>	<p>Policy EC1 'Sustainable Economic Growth' will seek to support the delivery of the strategic employment areas including the West Midlands Interchange, support opportunities for employment development in Tier 1 and Tier 2 villages and promote diversification of the rural economy.</p> <p>Policy EC2 'Retention of Employment Sites' seeks to protect existing designated employment areas.</p> <p>Policy EC4 'Rural Economy' supports rural diversification subject to certain measures.</p> <p>Policies EC8 'Retail' and EC9 'Protecting Community Services and Facilities' will seek to protect the vibrancy of village centres by ensuring any new residential development does not result in the loss of essential services or facilities.</p>	<p>The LPR policies would be expected to mitigate the potential adverse impacts associated with the loss of existing employment uses associated with the reasonable alternative sites.</p>
<p>Limited access to employment opportunities by public transport</p>	<p>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.</p> <p>Policy EC12 'Sustainable Transport' supports a range of measures to encourage more sustainable modes of transport, including "<i>opportunities to improve bus and rail services and connections including making provision from increased demand from new development within the district</i>".</p>	<p>While the LPR policies are likely to improve opportunities for local employment and improve access to sustainable transport for commuting purposes, it is unlikely these policies would be able to fully mitigate the identified impact of limited access to employment by public transport.</p>

H.4 Post mitigation site assessments

H.4.1 Overview

H.4.1.1 The impact matrix for all reasonable alternative site assessments, post-mitigation is presented in **Table H.4.1**. These impacts have been identified following consideration of the likely mitigation effects of the LPR strategic and DM policies as discussed in **Tables H.3.1 to H.3.12**.

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

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
023	Bednall	+/-	+	0	--	0	-	+	-	0	-	-	--
024	Bednall	+/-	+	0	--	0	-	+	-	0	-	-	--
026	Bednall	+/-	+	0	--	0	+	+	-	0	-	-	--
210	Bilbrook & Codsall	+/-	+	0	--	-	-	+	-	0	-	++	+
211	Bilbrook & Codsall	+/-	0	0	-	0	-	+	-	0	++	-	-
213	Bilbrook & Codsall	+/-	+	0	0	0	+	+	-	0	++	++	+
221	Bilbrook & Codsall	+/-	0	0	--	0	-	+	-	0	-	++	+
222	Bilbrook & Codsall	+/-	+	0	--	0	-	+	-	0	-	-	-
224	Bilbrook & Codsall	+/-	+	0	--	-	-	+	-	0	-	-	+
SAD228	Bilbrook & Codsall	+/-	+	0	0	-	+	+	-	0	++	++	+
236	Bilbrook & Codsall	+/-	+	0	--	-	-	+	-	0	-	--	-
419a/b	Bilbrook & Codsall	+/-	+	0	-	0	-	+	-	0	-	--	-
447	Bilbrook & Codsall	+/-	+	0	--	0	-	+	-	0	-	-	+
500	Bilbrook & Codsall	+/-	0	0	--	-	-	+	-	0	-	-	+
503	Bilbrook & Codsall	+/-	0	0	--	-	-	+	-	0	-	++	+
507	Bilbrook & Codsall	+/-	+	0	--	0	-	+	-	0	-	-	-
510	Bilbrook & Codsall	+/-	+	0	--	-	-	+	-	0	-	++	+
512	Bilbrook & Codsall	+/-	0	0	--	-	-	+	-	0	-	--	-
515	Bilbrook & Codsall	+/-	+	0	--	0	-	+	-	0	-	--	-
519	Bilbrook & Codsall	+/-	0	0	--	-	-	+	-	0	-	-	-
630a	Bilbrook & Codsall	+/-	+	0	--	0	-	+	-	0	-	--	-
630b	Bilbrook & Codsall	+/-	0	0	--	-	-	+	-	0	-	--	-
666	Bilbrook & Codsall	+/-	0	0	--	-	-	+	-	0	-	-	-
703	Bilbrook & Codsall	+/-	+	0	--	0	-	+	-	0	-	-	-
735	Bilbrook & Codsall	+/-	+	0	--	0	-	+	-	0	-	++	-
740	Bilbrook & Codsall	+/-	+	0	0	0	-	+	-	0	++	++	+
096	Bishops Wood	+/-	+	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
097	Bishops Wood	+/-	+	0	--	0	-	+	-	0	-	-	-
099	Bishops Wood	+/-	+	0	--	0	-	+	-	0	-	-	-
207	Bloxwich	+/-	+	0	-	-	+	+	-	0	+	++	-
492a/b/c	Bloxwich	+/-	+	0	--	-	-	+	-	0	-	-	-
319	Bobbington	+/-	+	0	-	0	-	+	-	0	-	-	--
320	Bobbington	+/-	+	0	--	0	-	+	-	0	-	-	--
321	Bobbington	+/-	+	0	--	0	-	+	-	0	-	-	--
410	Bobbington	+/-	+	0	--	0	-	+	-	0	-	-	--
057	Brewood	+/-	+	0	0	0	+	+	-	0	-	-	-
062	Brewood	+/-	+	0	--	0	-	+	-	0	-	-	-
067	Brewood	+/-	+	0	--	0	-	+	-	0	-	--	-
074	Brewood	+/-	+	0	--	0	-	+	-	0	-	-	-
075/075a	Brewood	+/-	+	0	--	0	-	+	-	0	-	-	-
076	Brewood	+/-	+	0	--	0	-	+	-	0	-	-	-
076a	Brewood	+/-	+	0	--	0	-	+	-	0	-	-	-
078	Brewood	+/-	+	0	--	0	-	+	-	0	-	-	-
079	Brewood	+/-	+	0	--	0	-	+	-	0	-	-	-
376	Brewood	+/-	+	0	--	0	-	+	-	0	-	-	-
611	Brewood	+/-	+	0	--	0	-	+	-	0	-	-	-
616	Brewood	+/-	+	0	--	0	-	+	-	0	-	-	-
617	Brewood	+/-	0	0	--	0	-	+	-	0	-	--	-
658	Brewood	+/-	+	0	--	0	-	+	-	0	-	-	-
202	Cannock	+/-	+	0	--	-	-	+	-	0	-	-	-
203	Cannock	+/-	+	0	--	-	-	+	-	0	-	--	-
474	Cannock	+/-	+	0	--	-	-	+	-	0	-	-	-
529	Cannock	+/-	+	0	--	-	-	+	-	0	-	-	-
624	Cannock	+/-	+	0	--	-	-	+	-	0	-	--	-
659	Cannock	+/-	+	0	--	0	-	+	-	0	-	++	-
720	Cannock	+/-	0	0	-	-	+	+	-	0	-	--	-
116	Cheslyn Hay & Great Wyrley	+/-	+	0	--	0	-	+	-	0	-	-	-
119a	Cheslyn Hay & Great Wyrley	+/-	+	0	-	0	-	+	-	0	-	++	+
119b	Cheslyn Hay & Great Wyrley	+/-	+	0	-	-	-	+	-	0	-	++	-
120	Cheslyn Hay & Great Wyrley	+/-	+	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
131	Cheslyn Hay & Great Wyrley	+/-	+	0	--	-	-	+	-	0	-	-	-
134	Cheslyn Hay & Great Wyrley	+/-	+	0	-	-	-	+	-	0	-	-	-
136	Cheslyn Hay & Great Wyrley	+/-	+	0	-	-	-	+	-	0	++	-	+
SAD136	Cheslyn Hay & Great Wyrley	+/-	+	0	0	-	-	+	-	0	++	++	+
136a	Cheslyn Hay & Great Wyrley	+/-	+	0	-	0	-	+	-	0	-	-	-
137	Cheslyn Hay & Great Wyrley	+/-	+	0	--	0	-	+	-	0	-	-	-
138	Cheslyn Hay & Great Wyrley	+/-	0	0	-	-	-	+	-	0	++	++	-
SAD139	Cheslyn Hay & Great Wyrley	+/-	+	0	0	-	-	+	-	0	-	++	-
SAD141	Cheslyn Hay & Great Wyrley	+/-	+	0	0	-	-	+	-	0	++	++	+
440	Cheslyn Hay & Great Wyrley	+/-	+	0	-	0	-	+	-	0	-	++	-
489	Cheslyn Hay & Great Wyrley	+/-	+	0	-	-	-	+	-	0	-	++	-
491	Cheslyn Hay & Great Wyrley	+/-	+	0	0	-	+	+	-	0	++	-	+
523	Cheslyn Hay & Great Wyrley	+/-	+	0	-	0	-	+	-	0	-	++	+
525	Cheslyn Hay & Great Wyrley	+/-	0	0	--	0	-	+	-	0	-	-	-
526	Cheslyn Hay & Great Wyrley	+/-	+	0	--	-	-	+	-	0	-	--	-
536a	Cheslyn Hay & Great Wyrley	+/-	+	0	--	-	-	+	-	0	-	-	-
536b	Cheslyn Hay & Great Wyrley	+/-	+	0	--	-	-	+	-	0	-	-	-
638	Cheslyn Hay & Great Wyrley	+/-	+	0	0	-	+	+	-	0	++	-	-
696	Cheslyn Hay & Great Wyrley	+/-	+	0	--	-	-	+	-	0	-	--	-
704	Cheslyn Hay & Great Wyrley	+/-	+	0	0	-	+	+	-	0	-	++	-
730	Cheslyn Hay & Great Wyrley	+/-	+	0	-	0	+	+	-	0	-	++	-
741	Cheslyn Hay & Great Wyrley	+/-	+	0	0	-	-	+	-	0	++	++	+
082	Coven	+/-	+	0	0	-	-	+	-	0	-	-	-
082a	Coven	+/-	+	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
084a	Coven	+/-	+	0	--	0	-	+	-	0	-	--	-
085	Coven	+/-	+	0	-	-	-	+	-	0	-	-	-
087	Coven	+/-	+	0	-	-	-	+	-	0	-	-	-
615	Coven	+/-	0	0	-	0	-	+	-	0	-	--	-
618	Coven	+/-	+	0	--	-	-	+	-	0	-	-	+
739	Coven	+/-	+	0	0	-	+	+	-	0	-	-	+
029	Dunston	+/-	0	0	-	-	-	+	-	0	-	-	-
029a	Dunston	+/-	+	0	-	-	-	+	-	0	-	-	-
487	Dunston	+/-	0	0	-	-	-	+	-	0	-	-	-
588	Dunston	+/-	0	0	-	-	-	+	-	0	-	--	-
150	Essington	+/-	+	0	--	-	-	+	-	0	-	--	+
151/662	Essington	+/-	+	0	--	-	-	+	-	0	-	--	-
154	Essington	+/-	+	0	--	-	-	+	-	0	-	--	+
157	Essington	+/-	+	0	0	0	-	+	-	0	-	-	+
160	Essington	+/-	+	0	--	-	-	+	-	0	-	--	+
163	Essington	+/-	+	0	--	-	-	+	-	0	+	-	+
163a	Essington	+/-	+	0	--	-	-	+	-	0	-	--	-
163b	Essington	+/-	+	0	--	-	-	+	-	0	-	-	-
164	Essington	+/-	+	0	--	-	-	+	-	0	-	--	+
164a	Essington	+/-	+	0	--	-	-	+	-	0	-	-	+
165	Essington	+/-	+	0	--	-	-	+	-	0	-	--	+
166	Essington	+/-	+	0	--	-	-	+	-	0	-	--	+
392	Essington	+/-	0	0	--	-	-	+	-	0	-	++	+
393	Essington	+/-	+	0	-	-	-	+	-	0	-	-	+
471	Essington	+/-	+	0	--	0	-	+	-	0	-	-	-
486a/b	Essington	+/-	+	0	--	-	-	+	-	0	-	--	+
486c	Essington	+/-	+	0	--	-	-	+	-	0	-	-	+
520	Essington	+/-	+	0	--	-	-	+	-	0	-	++	-
679	Essington	+/-	+	0	--	-	-	+	-	0	-	-	+
102	Featherstone	+/-	+	0	--	-	-	+	-	0	-	--	+
SAD168	Featherstone	+/-	+	0	0	0	+	+	-	0	-	-	-
169	Featherstone	+/-	+	0	--	0	-	+	-	0	-	-	+
170	Featherstone	+/-	+	0	-	-	-	+	-	0	-	-	-
172	Featherstone	+/-	+	0	--	-	-	+	-	0	-	--	-
204	Featherstone	+/-	+	0	--	-	-	+	-	0	-	--	+
206	Featherstone	+/-	+	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
396	Featherstone	+/-	+	0	--	0	-	+	-	0	-	--	-
397	Featherstone	+/-	+	0	-	0	-	+	-	0	-	-	-
527	Featherstone	+/-	+	0	--	-	-	+	-	0	-	--	+
537/537a	Featherstone	+/-	0	0	--	-	-	+	-	0	-	-	+
646a/b	Featherstone	+/-	0	0	--	-	-	+	-	0	-	-	+
742	Featherstone	+/-	+	0	0	-	-	+	-	0	-	-	+
743	Featherstone	+/-	+	0	-	0	-	+	-	0	-	-	-
016	Huntington	+/-	+	0	0	-	-	+	-	0	-	-	-
017	Huntington	+/-	+	0	--	0	-	+	-	0	-	--	-
022	Huntington	+/-	+	0	--	0	-	+	-	0	-	--	-
591	Huntington	+/-	+	0	--	0	-	+	-	0	-	-	-
592	Huntington	+/-	+	0	--	-	-	+	-	0	-	-	-
732	Huntington	+/-	+	0	--	0	-	+	-	0	-	-	-
272	Kinver	+/-	+	0	--	0	-	+	-	0	-	-	-
273	Kinver	+/-	+	0	--	0	-	+	-	0	-	-	-
274	Kinver	+/-	+	0	-	0	-	+	-	0	-	-	-
SAD274	Kinver	+/-	+	0	-	0	-	+	-	0	-	-	-
409	Kinver	+/-	+	0	--	0	-	+	-	0	-	-	-
546	Kinver	+/-	+	0	--	0	-	+	-	0	-	-	-
549	Kinver	+/-	+	0	--	0	-	+	-	0	-	-	-
576	Kinver	+/-	+	0	--	0	-	+	-	0	-	-	-
249	Pattingham	+/-	+	0	--	0	-	+	-	0	-	-	-
250	Pattingham	+/-	+	0	--	0	-	+	-	0	-	-	-
251	Pattingham	+/-	+	0	-	0	-	+	-	0	-	-	-
252	Pattingham	+/-	+	0	--	0	-	+	-	0	-	-	-
253	Pattingham	+/-	+	0	--	0	-	+	-	0	-	-	-
255	Pattingham	+/-	+	0	-	0	-	+	-	0	-	-	-
257	Pattingham	+/-	+	0	--	0	-	+	-	0	-	-	-
400	Pattingham	+/-	+	0	--	0	-	+	-	0	-	-	-
401	Pattingham	+/-	+	0	--	0	-	+	-	0	-	-	-
421	Pattingham	+/-	+	0	--	0	-	+	-	0	-	-	-
005	Penkrige	+/-	+	0	-	-	-	+	-	0	-	++	-
006	Penkrige	+/-	+	0	-	0	-	+	-	0	-	-	-
010	Penkrige	+/-	0	0	--	-	-	+	-	0	-	--	-
420	Penkrige	+/-	0	0	-	-	-	+	-	0	++	++	+
430a	Penkrige	+/-	+	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
430b	Penkrige	+/-	+	0	--	-	-	+	-	0	-	--	-
584	Penkrige	+/-	0	0	--	-	-	+	-	0	-	--	-
585	Penkrige	+/-	+	0	--	-	-	+	-	0	-	-	+
585a	Penkrige	+/-	0	0	--	-	-	+	-	0	-	-	+
665	Penkrige	+/-	0	0	--	-	-	+	-	0	+	-	+
711	Penkrige	+/-	0	0	--	-	-	+	-	0	++	+	+
350c	Penn & Lower Penn	+/-	+	0	--	0	-	+	-	0	-	-	-
350d	Penn & Lower Penn	+/-	+	0	--	-	-	+	-	0	-	-	-
494a	Penn & Lower Penn	+/-	+	0	--	-	-	+	-	0	-	-	-
494b	Penn & Lower Penn	+/-	+	0	--	-	-	+	-	0	-	-	-
559	Penn & Lower Penn	+/-	+	0	--	-	-	+	-	0	-	--	-
561	Penn & Lower Penn	+/-	+	0	--	-	-	+	-	0	-	-	-
573	Penn & Lower Penn	+/-	+	0	--	-	-	+	-	0	-	--	-
579	Penn & Lower Penn	+/-	0	0	--	-	-	+	-	0	-	-	-
582	Penn & Lower Penn	+/-	+	0	--	-	-	+	-	0	-	++	-
710	Penn & Lower Penn	+/-	+	0	--	-	-	+	-	0	-	-	-
238	Perton	+/-	+	0	--	-	-	+	-	0	-	--	-
239	Perton	+/-	+	0	-	0	-	+	-	0	-	--	-
241	Perton	+/-	+	0	--	-	-	+	-	0	-	-	-
243	Perton	+/-	+	0	--	-	-	+	-	0	-	-	-
245	Perton	+/-	+	0	-	-	+	+	-	0	-	--	-
246a	Perton	+/-	+	0	--	0	-	+	-	0	-	--	-
260	Perton	+/-	+	0	--	-	-	+	-	0	-	--	-
402	Perton	+/-	+	0	-	-	-	+	-	0	-	-	-
407	Perton	+/-	+	0	--	0	-	+	-	0	-	--	-
454	Perton	+/-	+	0	--	0	-	+	-	0	-	-	-
504	Perton	+/-	+	0	--	-	-	+	-	0	-	-	-
505	Perton	+/-	+	0	-	-	-	+	-	0	-	-	-
506	Perton	+/-	+	0	--	0	-	+	-	0	-	-	-
705	Perton	+/-	+	0	--	0	-	+	-	0	-	--	-
339	Sedgley	+/-	+	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
548	Sedgley	+/-	+	0	--	-	-	+	-	0	-	-	-
560	Sedgley	+/-	+	0	--	-	-	+	-	0	-	++	-
566	Sedgley	+/-	+	0	--	-	-	+	-	0	-	-	-
567	Sedgley	+/-	+	0	--	-	-	+	-	0	-	++	-
358	Seisdon	+/-	+	0	--	0	-	+	-	0	-	--	-
359	Seisdon	+/-	+	0	--	0	-	+	-	0	-	--	-
671	Seisdon	+/-	+	0	--	0	-	+	-	0	-	--	-
702	Seisdon	+/-	+	0	--	0	-	+	-	0	-	--	-
181	Shareshill	+/-	+	0	--	0	-	+	-	0	-	-	-
183	Shareshill	+/-	+	0	--	0	-	+	-	0	-	-	-
184	Shareshill	+/-	+	0	-	0	-	+	-	0	-	-	-
185	Shareshill	+/-	+	0	-	0	-	+	-	0	-	-	-
036a	Stafford	+/-	0	0	--	-	-	+	-	0	-	--	-
036c	Stafford	+/-	+	0	--	-	-	+	-	0	-	++	-
312a	Swindon	+/-	+	0	--	0	-	+	-	0	-	-	-
313	Swindon	+/-	+	0	--	0	-	+	-	0	-	-	-
SAD313	Swindon	+/-	+	0	0	0	-	+	-	0	-	-	-
314	Swindon	+/-	+	0	--	0	-	+	-	0	-	-	-
315	Swindon	+/-	+	0	--	0	-	+	-	0	-	-	-
412	Swindon	+/-	0	0	-	0	-	+	-	0	-	-	-
437	Swindon	+/-	0	0	--	0	-	+	-	0	-	-	-
682	Swindon	+/-	+	0	--	0	-	+	-	0	-	-	-
717	Swindon	+/-	+	0	--	0	-	+	-	0	-	-	-
718	Swindon	+/-	+	0	--	0	-	+	-	0	-	-	-
327	Trysull	+/-	+	0	--	0	-	+	-	0	-	-	--
328	Trysull	+/-	+	0	--	0	-	+	-	0	-	-	--
329	Trysull	+/-	+	0	--	0	-	+	-	0	-	-	--
544	Trysull	+/-	+	0	--	0	-	+	-	0	-	-	--
558	Trysull	+/-	+	0	--	0	-	+	-	0	-	-	--
368	Wall Heath	+/-	0	0	--	-	-	+	-	0	-	--	-
370	Wall Heath	+/-	0	0	--	-	-	+	-	0	-	--	-
577	Wall Heath	+/-	+	0	--	-	-	+	-	0	-	--	-
684	Wall Heath	+/-	+	0	--	-	-	+	-	0	-	--	-
090	Wheaton Aston	+/-	0	0	--	0	-	+	-	0	-	-	-
091	Wheaton Aston	+/-	0	0	--	0	-	+	-	0	-	-	-
092	Wheaton Aston	+/-	+	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
094	Wheaton Aston	+/-	+	0	--	0	-	+	-	0	-	-	-
377/093	Wheaton Aston	+/-	+	0	-	0	-	+	-	0	-	-	-
378	Wheaton Aston	+/-	+	0	--	0	-	+	-	0	-	-	-
378a	Wheaton Aston	+/-	+	0	--	0	-	+	-	0	-	-	-
379	Wheaton Aston	+/-	+	0	-	0	-	+	-	0	-	-	-
SAD379	Wheaton Aston	+/-	+	0	-	0	-	+	-	0	-	-	-
382	Wheaton Aston	+/-	+	0	--	0	-	+	-	0	-	-	-
426a	Wheaton Aston	+/-	+	0	-	0	-	+	-	0	-	-	-
426b	Wheaton Aston	+/-	0	0	--	0	-	+	-	0	-	-	-
608	Wheaton Aston	+/-	+	0	--	0	-	+	-	0	-	-	-
610	Wheaton Aston	+/-	+	0	--	0	-	+	-	0	-	-	-
614	Wheaton Aston	+/-	+	0	-	0	-	+	-	0	-	-	-
619	Wheaton Aston	+/-	+	0	--	0	-	+	-	0	-	-	-
364	Wollaston & Wordsley	+/-	+	0	--	-	-	+	-	0	-	++	-
365	Wollaston & Wordsley	+/-	+	0	--	-	-	+	-	0	-	-	-
654	Wollaston & Wordsley	+/-	+	0	--	-	-	+	-	0	-	--	-
655	Wollaston & Wordsley	+/-	+	0	--	-	-	+	-	0	-	--	-
673	Wollaston & Wordsley	+/-	+	0	--	-	-	+	-	0	-	++	-
280	Wombourne	+/-	0	0	-	0	-	+	-	0	-	++	-
283	Wombourne	+/-	+	0	--	0	-	+	-	0	-	-	-
284	Wombourne	+/-	0	0	--	-	-	+	-	0	-	++	-
285	Wombourne	+/-	+	0	-	0	-	+	-	0	-	-	-
286	Wombourne	+/-	+	0	-	0	-	+	-	0	-	++	-
298	Wombourne	+/-	+	0	-	0	-	+	-	0	-	-	-
305	Wombourne	+/-	+	0	0	0	-	+	-	0	-	-	-
306	Wombourne	+/-	+	0	--	-	-	+	-	0	-	++	-
309	Wombourne	+/-	+	0	--	0	-	+	-	0	-	--	-
310a	Wombourne	+/-	+	0	--	0	+	+	-	0	-	-	-
310b	Wombourne	+/-	0	0	-	0	+	+	-	0	-	-	-
335a	Wombourne	+/-	+	0	-	0	-	+	-	0	-	--	-
335b	Wombourne	+/-	+	0	-	0	-	+	-	0	-	--	-
416	Wombourne	+/-	+	0	-	0	-	+	-	0	-	-	-
416a	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
417	Wombourne	+/-	+	0	-	0	-	+	-	0	-	-	-
438	Wombourne	+/-	0	0	-	0	-	+	-	0	-	++	-
458	Wombourne	+/-	0	0	-	0	-	+	-	0	-	-	-
459	Wombourne	+/-	+	0	-	0	-	+	-	0	-	++	-
460	Wombourne	+/-	0	0	0	0	+	+	-	0	-	-	-
463a	Wombourne	+/-	+	0	--	0	-	+	-	0	-	++	-
463b	Wombourne	+/-	+	0	--	-	-	+	-	0	-	++	-
463c	Wombourne	+/-	+	0	--	-	-	+	-	0	-	++	-
463d	Wombourne	+/-	+	0	--	-	-	+	-	0	-	++	-
477	Wombourne	+/-	+	0	-	0	-	+	-	0	-	++	-
479a	Wombourne	+/-	+	0	-	0	-	+	-	0	-	--	-
554	Wombourne	+/-	+	0	-	0	-	+	-	0	-	-	-
562/415	Wombourne	+/-	+	0	-	0	-	+	-	0	-	++	-
626	Wombourne	+/-	+	0	--	0	-	+	-	0	-	-	-
627	Wombourne	+/-	+	0	--	0	-	+	-	0	-	-	-
628	Wombourne	+/-	+	0	--	0	-	+	-	0	-	-	-
629	Wombourne	+/-	+	0	--	0	-	+	-	0	-	-	-
701	Wombourne	+/-	+	0	--	-	-	+	-	0	-	++	-
707	Wombourne	+/-	+	0	--	0	-	+	-	0	-	--	-
708	Wombourne	+/-	+	0	--	0	-	+	-	0	-	-	-
738	Wombourne	+/-	+	0	0	0	-	+	-	0	-	-	-
E04a	Employment Sites	+/-	+	0	-	-	-	0	-	0	-	0	++
E04b	Employment Sites	+/-	+	0	-	-	-	0	-	0	-	0	++
E05	Employment Sites	+/-	+	0	-	-	-	0	-	0	-	0	++
E14	Employment Sites	+/-	+	0	0	-	-	0	-	0	-	0	++
E15a	Employment Sites	+/-	+	0	--	-	+	0	-	0	-	0	++
E18	Employment Sites	+/-	+	0	-	-	-	0	-	0	-	0	++
E20a	Employment Sites	+/-	+	0	0	-	-	0	-	0	-	0	++
E20b	Employment Sites	+/-	+	0	0	-	-	0	-	0	-	0	++
E24	Employment Sites	+/-	+	0	-	-	-	0	-	0	-	0	++
E30	Employment Sites	+/-	+	0	-	-	-	0	-	0	-	0	++
E31	Employment Sites	+/-	+	0	--	0	-	0	-	0	-	0	++
E32	Employment Sites	+/-	+	0	--	0	-	0	-	0	-	0	++
E33	Employment Sites	+/-	+	0	--	-	-	0	-	0	-	0	++
E37a/b	Employment Sites	+/-	0	0	--	-	-	0	-	0	-	0	++
E38	Employment Sites	+/-	+	0	--	-	-	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
E39	Employment Sites	+/-	+	0	--	-	-	0	-	0	-	0	++
E41	Employment Sites	+/-	+	0	--	-	-	0	-	0	-	0	++
E42	Employment Sites	+/-	0	0	--	-	-	0	-	0	-	0	++
E43	Employment Sites	+/-	0	0	--	-	-	0	-	0	-	0	++
E44	Employment Sites	+/-	+	0	-	-	-	0	-	0	-	0	++
E45	Employment Sites	+/-	0	0	--	-	-	0	-	0	-	0	++
E46	Employment Sites	+/-	0	0	--	-	-	0	-	0	-	0	++
E47	Employment Sites	+/-	+	0	--	-	-	0	-	0	-	0	++
E48	Employment Sites	+/-	+	0	--	-	-	0	-	0	-	0	++
E49	Employment Sites	+/-	+	0	--	-	-	0	-	0	-	0	++
E50	Employment Sites	+/-	+	0	-	-	-	0	-	0	-	0	++
E51a	Employment Sites	+/-	+	0	--	-	-	0	-	0	-	0	++
E51b	Employment Sites	+/-	+	0	--	0	-	0	-	0	-	0	++
E52	Employment Sites	+/-	+	0	--	-	-	0	-	0	-	0	++
E53	Employment Sites	+/-	0	0	--	-	-	0	-	0	-	0	++
E54	Employment Sites	+/-	+	0	--	-	-	0	-	0	-	0	++
E55	Employment Sites	+/-	0	0	--	0	+	0	-	0	-	0	++
E56	Employment Sites	+/-	0	0	--	-	-	0	-	0	-	0	++
E57	Employment Sites	+/-	0	0	-	-	-	0	-	0	-	0	++
E58a	Employment Sites	+/-	+	0	--	-	-	0	-	0	-	0	++
E58b	Employment Sites	+/-	+	0	-	-	-	0	-	0	-	0	++
E59	Employment Sites	+/-	+	0	--	0	-	0	-	0	-	0	++
E60a	Employment Sites	+/-	+	0	--	-	-	0	-	0	-	0	++
E60b	Employment Sites	+/-	+	0	--	-	-	0	-	0	-	0	++
E61a	Employment Sites	+/-	0	0	--	0	-	0	-	0	-	0	++
E61b	Employment Sites	+/-	0	0	--	-	-	0	-	0	-	0	++
GT01	Gypsy & Traveller	+/-	+	0	--	-	+	+/-	-	0	-	--	--
GT02	Gypsy & Traveller	+/-	+	0	--	0	+	+/-	-	0	-	--	--
GT03	Gypsy & Traveller	+/-	+	0	-	0	+	+/-	-	0	-	--	--
GT04	Gypsy & Traveller	+/-	0	0	--	0	-	+/-	-	0	-	--	+
GT05	Gypsy & Traveller	+/-	+	0	--	0	+	+/-	-	0	-	--	+
GT06	Gypsy & Traveller	+/-	+	0	--	0	+	+/-	-	0	-	--	+
GT07	Gypsy & Traveller	+/-	+	0	--	0	+	+/-	-	0	-	--	--
GT08	Gypsy & Traveller	+/-	+	0	--	-	+	+/-	-	0	-	--	+
GT09	Gypsy & Traveller	+/-	+	0	0	0	+	+/-	-	0	-	--	+
GT10	Gypsy & Traveller	+/-	+	0	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
GT11	Gypsy & Traveller	+/-	+	0	0	0	+	+/-	-	0	-	--	+
GT12	Gypsy & Traveller	+/-	0	0	--	-	-	+/-	-	0	-	--	--
GT13	Gypsy & Traveller	+/-	+	0	--	0	+	+/-	-	0	-	++	--
GT14	Gypsy & Traveller	+/-	+	0	--	-	-	+/-	-	0	-	--	+
GT15	Gypsy & Traveller	+/-	+	0	0	-	+	+/-	-	0	-	-	-
GT16	Gypsy & Traveller	+/-	+	0	0	-	+	+/-	-	0	-	-	-
GT17	Gypsy & Traveller	+/-	+	0	-	0	-	+/-	-	0	-	--	--
GT18	Gypsy & Traveller	+/-	+	0	-	0	+	+/-	-	0	-	++	--
GT19	Gypsy & Traveller	+/-	+	0	--	-	+	+/-	-	0	-	--	+
GT20	Gypsy & Traveller	+/-	+	0	-	-	-	+/-	-	0	-	--	+
GT23	Gypsy & Traveller	+/-	+	0	--	0	+	+/-	-	0	-	--	+
GT24	Gypsy & Traveller	+/-	+	0	-	0	-	+/-	-	0	-	-	-
GT27	Gypsy & Traveller	+/-	+	0	-	0	-	+/-	-	0	-	--	+
GT30	Gypsy & Traveller	+/-	0	0	--	-	+	+/-	-	0	-	--	--
GT32	Gypsy & Traveller	+/-	+	0	-	-	+	+/-	-	0	-	++	--
GT33	Gypsy & Traveller	+/-	+	0	--	0	+	+/-	-	0	-	--	--
GT34	Gypsy & Traveller	+/-	+	0	--	-	+	+/-	-	0	-	--	-
GT35	Gypsy & Traveller	+/-	+	0	-	0	-	+/-	-	0	-	-	+
GT36	Gypsy & Traveller	+/-	+	0	--	0	+	+/-	-	0	-	--	-
TSP01	Gypsy & Traveller	+/-	+	0	-	-	+	+/-	-	0	-	-	+
SCC1	Gypsy & Traveller	+/-	+	0	-	0	-	+/-	-	0	-	--	--
SCC2	Gypsy & Traveller	+/-	0	0	-	-	-	+/-	-	0	-	--	-
SCC3	Gypsy & Traveller	+/-	0	0	--	-	-	+/-	-	0	-	--	+
SCC4	Gypsy & Traveller	+/-	0	0	--	0	-	+/-	-	0	-	--	-
SCC5	Gypsy & Traveller	+/-	0	0	--	-	-	+/-	-	0	-	--	-
SCC6	Gypsy & Traveller	+/-	0	0	--	-	-	+/-	-	0	-	-	-
SCC7	Gypsy & Traveller	+/-	0	0	-	0	-	+/-	-	0	-	-	--
SCC8	Gypsy & Traveller	+/-	0	0	--	-	-	+/-	-	0	-	-	--
SCC9	Gypsy & Traveller	+/-	+	0	--	-	-	+/-	-	0	-	++	-
SCC10	Gypsy & Traveller	+/-	+	0	-	0	-	+/-	-	0	-	-	--

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

I.1 Selected Residential Sites	I1
I.2 Rejected Residential Sites	I10
I.3 Selected Employment Sites	I70
I.4 Rejected Employment Sites	I72
I.5 Selected Gypsy and Traveller Sites.....	I83
I.6 Rejected Gypsy and Traveller Sites	I84

I.1 Selected Residential Sites

I.1.1.1 **Table I.1.1** lists the preferred residential-led sites set out in the Publication Version of the South Staffordshire LPR (2024), within Policies SA1-SA3. The outline reasons for selecting each of the sites, as set out in the table below, have been determined by SSDC.

I.1.1.2 It should be noted that three residential sites which were assessed in the Regulation 18 (III) SA (2021) have since been granted planning permission: SAD168 (19/00919/FUL), SAD274 (20/00621/OUT) and 426a (21/00660/FUL). As such, these three sites are no longer proposed to be allocated through the LPR and are no longer reasonable alternative sites. They therefore do not feature in the below tables.

Table I.1.1: Outline reasons for selecting residential sites

Settlement	Site Ref.	Site Address	Outline Reasons for Selection (provided by Council)
Penkridge	005	Land off Cherrybrook Drive	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> In non-Green Belt safeguarded land allocated as safeguarded land in Site Allocations Document 2018 Major positive impacts predicted against education and transport and accessibility in the Sustainability Appraisal The site is within 2km walking distance to a railway station. <p><u>Conclusion</u></p> <p>Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy if delivered alongside Sites 006, 420, 584 and 010.</p>
Penkridge	006	Land off Boscomoor Lane	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Lies in the Green Belt (low-moderate harm) unlike other site options around the village Similar landscape sensitivity to the majority of land around the village (site is 'moderate') The site is within 2km walking distance to a railway station. <p><u>Conclusion</u></p> <p>Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options. It could therefore support the Council's preferred spatial strategy if delivered alongside Sites 420, 584 and 005.</p>
Penkridge	010	Land at Lower Drayton Farm	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Unlike other site options around the village, the site is not within the Green Belt In a higher sensitivity landscape compared to the majority of land around the village (site is 'moderate-high') Major negative impacts predicted against education in the Sustainability Appraisal, however there is potential for Sites 584 and 010 to jointly deliver on-site education infrastructure to mitigate this issue

Settlement	Site Ref.	Site Address	Outline Reasons for Selection (provided by Council)
			<ul style="list-style-type: none"> Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas could lead to unsustainable patterns of growth as set out in the Spatial Housing Strategy Topic Paper. The site is within 2km walking distance to a railway station. <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy if delivered alongside Sites 420, 584, 006 and 005.</p>
Penkridge	420	land North of Penkridge off A449 (East)	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Unlike other site options around the village, the site is not within the Green Belt Similar landscape sensitivity to the majority of land around the village (site is 'moderate') Major positive impacts predicted against education and transport and accessibility in the Sustainability Appraisal The site is within 2km walking distance to a railway station. <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy if delivered alongside Sites 420, 584, 006 and 005.</p>
Penkridge	584	Land north of Penkridge off the A449	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Unlike other site options around the village, the site is not within the Green Belt Includes land in a higher sensitivity landscape compared to the majority of land around the village (site is 'moderate-high') Major negative impacts predicted against education in the Sustainability Appraisal, however there is potential for Sites 584 and 010 to jointly deliver on-site education infrastructure to mitigate this issue Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development The site is within 2km walking distance to a railway station. <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy if delivered alongside Sites 420, 010 and 005.</p>
Codsall/Bilbrook	SAD Site 228	Former Adult Training Centre off Histons Hill	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Unlike Green Belt site options around Bilbrook/Codsall, the land is a development boundary site allocated by 2018 Site Allocations Document Major positive impacts predicted against education and transport and accessibility in the Sustainability Appraisal Opportunity to redevelop brownfield land Due to site size and location, unlikely to be able to deliver the required Codsall station car parking or required first school for Codsall/Bilbrook

Settlement	Site Ref.	Site Address	Outline Reasons for Selection (provided by Council)
			<ul style="list-style-type: none"> The site is within 2km walking distance to a railway station. <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred strategy for Bilbrook/Codsall if delivered alongside Sites 213, 519, 224, SAD Site 228 and 419a&b</p>
Codsall/Bilbrook	213	Bilbrook House, Carter Avenue	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Unlike Green Belt site options around Bilbrook/Codsall, the land is a development boundary site Major positive impacts predicted against education and transport and accessibility in the Sustainability Appraisal Opportunity to redevelop brownfield land Due to site size and location, unlikely to be able to deliver the required Codsall station car parking or required first school for Codsall/Bilbrook The site is within 2km walking distance to a railway station. <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma and other development options in Bilbrook/Codsall, the site is considered to perform better than other site options and could deliver the Council's preferred strategy for Bilbrook/Codsall if delivered alongside Sites 519, 224, SAD Site 228 and 419a&b</p>
Codsall/Bilbrook	224	Land adjacent 44 Station Rd	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Lesser Green Belt harm than the majority of land around Bilbrook/Codsall (site is 'moderate/high') In a higher sensitivity landscape to the majority of land around Bilbrook/Codsall (site is 'high') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development. Located in very close proximity to Codsall station, with landowner indicating willingness to deliver additional station parking The site is within 2km walking distance to a railway station. <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma and other development options in Bilbrook/Codsall, the site is considered to perform better than other site options and could deliver the Council's preferred strategy for Bilbrook/Codsall if delivered alongside Sites 519, 213, SAD Site 228 and 419a&b</p>
Codsall/Bilbrook	419a	Land at Keepers Lane and Nine Acres Farm, Codsall	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> In non-Green Belt safeguarded land allocated as safeguarded land in Site Allocations Document 2018 Due to site size (when considered with site 419b), the site has capacity to deliver required first school to serve the villages Major negative impacts predicted against education in the Sustainability Appraisal The site is within 2km walking distance to a railway station. <p><u>Conclusion</u></p>

Settlement	Site Ref.	Site Address	Outline Reasons for Selection (provided by Council)
			Having regard to all site assessment factors set out in the proforma and other development options in Bilbrook/Codsall, the site is considered to perform better than other site options and could deliver the Council's preferred strategy for Bilbrook/Codsall if delivered alongside Sites 519, 224, SAD Site 228 and 213
Codsall/Bilbrook	419b	Land off Wergs Hall Road, Codsall	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> In non-Green Belt safeguarded land allocated as safeguarded land in Site Allocations Document 2018 Due to site size, has capacity to deliver required first school to serve the villages Major negative impacts predicted against education in the Sustainability Appraisal The site is within 2km walking distance to a railway station. <p><u>Conclusion</u></p> <p>Having regard to all site assessment factors set out in the proforma and other development options in Bilbrook/Codsall, the site is considered to perform better than other site options and could deliver the Council's preferred strategy for Bilbrook/Codsall if delivered alongside Sites 519, 224, SAD Site 228 and 213</p>
Codsall/Bilbrook	519	Land east of Bilbrook	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Part of site is an existing safeguarded land allocation made in the Site Allocations Document 2018 Remainder of site is of similar Green Belt harm to the majority of land around Bilbrook/Codsall (site is 'high') Similar landscape sensitivity to the majority of land around Bilbrook/Codsall (site is 'moderate') Due to site size, has capacity to deliver required first school to serve the villages Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development. Site provides scope for unique design benefits including a through road linking Lane Green Road to Pendeford Mill Lane (as required by the Site Allocations Document 2018) and close links to existing active travel links to strategic employment site (i54) and services in the Black Country The site is within 2km walking distance to a railway station. <p><u>Conclusion</u></p> <p>Having regard to all site assessment factors set out in the proforma and other development options in Bilbrook/Codsall, the site is considered to perform better than other site options and could deliver the Council's preferred strategy for Bilbrook/Codsall if delivered alongside Sites 213, 224, SAD Site 228 and 419a&b</p>
Cheslyn Hay/Great Wyrley	SAD 136	Land at Landywood Lane	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Unlike Green Belt site options around the village, the land is a development boundary site allocated by 2018 Site Allocations Document Major positive impacts predicted against education and transport and accessibility in the Sustainability Appraisal Majority of the site in an area of high habitat distinctiveness The site is within 2km walking distance to a railway station. <p><u>Conclusion</u></p>

Settlement	Site Ref.	Site Address	Outline Reasons for Selection (provided by Council)
			Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy if delivered alongside Sites 523, 119a, 136, 638, 704, 730, 536a, SAD Site 141, SAD Site 136 and SAD Site 139.
Cheslyn Hay/Great Wyrley	SAD 139	Pool View, Churchbridge	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Unlike Green Belt site options around the village, the land is a development boundary site allocated by 2018 Site Allocations Document • Major positive impacts predicted against education in the Sustainability Appraisal • Area of high habitat distinctiveness • The site is within 2km walking distance to a railway station. <p><u>Conclusion</u></p> <p>Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy if delivered alongside Sites 523, 119a, 136, 638, 704, 730, 536a, SAD Site 141, SAD Site 136 and SAD Site 139.</p>
Cheslyn Hay/Great Wyrley	SAD 141	154a Walsall Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Unlike Green Belt site options around the village, the land is a development boundary site allocated by 2018 Site Allocations Document • Major positive impacts predicted against education and transport and accessibility in the Sustainability Appraisal • Opportunity to redevelop brownfield land • The site is within 2km walking distance to a railway station. <p><u>Conclusion</u></p> <p>Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy if delivered alongside Sites 523, 119a, 136, 638, 704, 730, 536a, SAD Site 141, SAD Site 136 and SAD Site 139.</p>
Cheslyn Hay/Great Wyrley	119a	Land adjoining Saredon Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • In non-Green Belt safeguarded land allocated as safeguarded land in Site Allocations Document 2018 • Major positive impacts predicted against education in the Sustainability Appraisal • Site is within a mineral safeguarding area for brick clay <p><u>Conclusion</u></p> <p>The site is just outside of the 2km walking distance of a railway station. However, having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy if delivered alongside Sites 523, 119a, 136, 638, 704, 730, 536a, SAD Site 141, SAD Site 136 and SAD Site 139.</p>
Cheslyn Hay/Great Wyrley	136	Land off Upper Landywood Lane (north)	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • In non-Green Belt safeguarded land allocated as safeguarded land in Site Allocations Document 2018 • Major positive impacts predicted against transport and accessibility in the Sustainability Appraisal • Majority of the site is in an area of high habitat distinctiveness • The site is within 2km walking distance to a railway station. <p><u>Conclusion</u></p>

Settlement	Site Ref.	Site Address	Outline Reasons for Selection (provided by Council)
			Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy if delivered alongside Sites 523, 119a, 136, 638, 704, 730, 536a, SAD Site 141, SAD Site 136 and SAD Site 139.
Cheslyn Hay/Great Wyrley	523	Land east of Wolverhampton Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> In non-Green Belt safeguarded land allocated as safeguarded land in Site Allocations Document 2018 Major positive impacts predicted against education in the Sustainability Appraisal Site is within a mineral safeguarding area for brick clay <p><u>Conclusion</u></p> <p>Although the site is not within 2km of a railway station. Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy if delivered alongside Sites 523, 119a, 136, 638, 704, 536a, 704, 730, SAD Site 141, SAD Site 136 and SAD Site 139.</p>
Cheslyn Hay/Great Wyrley	536a	Land off Holly Lane Part 1 (east of rail line)	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Northern part of site is similar Green Belt harm to the majority of land around the village (site is 'high'), but land to south is very high harm Similar landscape sensitivity to the majority of land around the village (site is 'moderate') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development. Highways authority advise against allocation of full site due to surrounding road network Site could provide land adjacent to neighbouring school with need for increased parking capacity The site is within 2km walking distance to a railway station. <p><u>Conclusion</u></p> <p>Having regard to all site assessment factors set out in the proforma, the northern part of the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy if delivered alongside Sites 523, 119a, 136, 638, 704, 730, SAD Site 141, SAD Site 136 and SAD Site 139.</p>
Cheslyn Hay/Great Wyrley	638	Loades PLC	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Site is within the development boundary Major positive impacts predicted against transport and accessibility criteria in Sustainability Appraisal Site currently allocated as employment use but is currently vacant with site promoter undertaking a well-advanced marketing exercise that could indicate this issue is mitigable Site is previously developed land The site is within 2km walking distance to a railway station. <p><u>Conclusion</u></p> <p>Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy if delivered alongside Sites 523, 119a, 136, 704, SAD Site 141, SAD Site 136 and SAD Site 139.</p>
Cheslyn Hay/Great Wyrley	704	Land off Norton Lane	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Lower Green Belt harm to the majority of land around the village (site is 'low') Major positive impacts predicted against education in the Sustainability Appraisal

Settlement	Site Ref.	Site Address	Outline Reasons for Selection (provided by Council)
			<ul style="list-style-type: none"> Site is previously developed land The site is within 2km walking distance to a railway station. <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy if delivered alongside Sites 523, 119a, 136, 638, 730, SAD Site 141, SAD Site 136 and SAD Site 139.</p>
Cheslyn Hay/Great Wyrley	730	Fishers Farm	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Lower Green Belt harm to the majority of land around the village (site is 'moderate') Similar landscape sensitivity to the majority of land around the village (site is 'moderate') Major positive impacts predicted against education in the Sustainability Appraisal Site is previously developed land The site is within 2km walking distance to a railway station. <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy if delivered alongside Sites 523, 119a, 136, 638, 704, SAD Site 141, SAD Site 136 and SAD Site 139.</p>
Wombourne	285	Land off Poolhouse Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> In non-Green Belt safeguarded land allocated as safeguarded land in Site Allocations Document 2018 <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy.</p>
Wombourne	416	Land off Orton Lane (rear Strathmore Crescent)	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> In non-Green Belt safeguarded land allocated as safeguarded land in Site Allocations Document 2018 <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy.</p>
Wombourne	459	Land off Poolhouse Road (2)	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> In non-Green Belt safeguarded land allocated as safeguarded land in Site Allocations Document 2018 Major positive impacts predicted against the education criteria in Sustainability Appraisal <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy.</p>
Wombourne	562/415	Land off Pool House Road/Clap Gate Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> In non-Green Belt safeguarded land allocated as safeguarded land in Site Allocations Document 2018 Major positive impacts predicted against the education criteria in Sustainability Appraisal <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy.</p>

Settlement	Site Ref.	Site Address	Outline Reasons for Selection (provided by Council)
Brewood	617	Land off Four Ashes Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Part of the site closest to the village is in non-Green Belt safeguarded land allocated as safeguarded land in Site Allocations Document 2018 The Green Belt area of the site is in similar Green Belt harm to the majority of land around the village (site is 'moderate-high') The Green Belt area of the site is partially in an area of similar landscape sensitivity to the majority of land around the village ('high'), with the remainder being in an area of lesser sensitivity ('moderate-high') Major negative impacts predicted against education in the Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the safeguarded part of the site only is considered to perform better than other site options and could deliver the Council's preferred spatial strategy.</p>
Kinver	274	Land south of White Hill	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> In non-Green Belt safeguarded land allocated as safeguarded land in Site Allocations Document 2018 <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy.</p>
Perton	239	Land west Wrottesley Park Road (south)	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> In non-Green Belt safeguarded land allocated as safeguarded land in Site Allocations Document 2018 Major negative impacts predicted against education in the Sustainability Appraisal <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy.</p>
Huntington	016	Pear Tree Farm	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> In non-Green Belt safeguarded land allocated as safeguarded land in Site Allocations Document 2018 <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy.</p>
Coven	082	Land between A449 Stafford Rd and School Lane, Coven	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Part of the site adjacent to the village is in non-Green Belt safeguarded land allocated as safeguarded land in Site Allocations Document 2018 The Green Belt area of the site is in lower Green Belt harm than the majority of land around the village (site is 'moderate') The Green Belt area of the site is in an area of similar landscape sensitivity to the majority of land around the village ('moderate')

Settlement	Site Ref.	Site Address	Outline Reasons for Selection (provided by Council)
			<p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the safeguarded part of the site only is considered to perform better than other site options and could deliver the Council's preferred spatial strategy if allocated.</p>
Featherstone	397	Land adj to Brinsford Lodge, Brookhouse Lane, Featherstone	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> In non-Green Belt safeguarded land allocated as safeguarded land in Site Allocations Document 2018 <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy.</p>
Wheaton Aston	SAD 379	Land east of Ivetsey Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Unlike Open Countryside site options around the village, the land is a development boundary site allocated by 2018 Site Allocations Document <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy.</p>
Pattingham	251 (safeguarded land)	Hall End Farm	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> In non-Green Belt safeguarded land allocated as safeguarded land in Site Allocations Document 2018 <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy.</p>
Swindon	SAD 313	Land off Himley Lane	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Unlike Green Belt site options around the village, the land is a development boundary site allocated by 2018 Site Allocations Document <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy.</p>
South of Stafford	036c	Land at Weeping Cross	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Similar landscape sensitivity to the majority of land in this broad location (site is 'high') Major positive impacts predicted against education in the Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. HESA Stage 2 indicates that development should be limited to the northern low-lying part of the site <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, part of the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy.</p>

I.2 Rejected Residential Sites

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

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

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
Penkridge	430a	Land off Lyne Hill Lane/A449	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Lies in the Green Belt (moderate-high harm) unlike other site options around the village Similar landscape sensitivity to the majority of land around the village (site is 'moderate') Major negative impacts predicted against the education criteria in the Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development. Highways authority has raised initial concerns regarding site's access The site is within 2km walking distance to a railway station. <p><u>Conclusion</u></p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 005, 006, 420, 584 and 010.</p>
Penkridge	430b	Land off Lyne Hill Lane/A449	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Lies in the Green Belt (moderate-high harm) unlike other site options around the village Similar landscape sensitivity to the majority of land around the village (site is 'moderate') Major negative impacts predicted against education in the Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development. Highways authority has raised initial concerns regarding site's access The site is within 2km walking distance to a railway station. <p><u>Conclusion</u></p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 005, 006, 420, 584 and 010.</p>
Penkridge	711	Hatherton House, Pinfold Lane	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Lies in the Green Belt (high harm) unlike other site options around the village Higher landscape sensitivity than the majority of land around the village (site is 'moderate-high') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development. Major positive impacts predicted against the transport and accessibility criteria

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<ul style="list-style-type: none"> Highways authority has raised initial concerns regarding site's connectivity and impact on junctions in surrounding area <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 005, 006, 420, 584 and 010.</p>
Codsall/Bilbrook	210	Land off Lane Green Avenue/Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Lesser Green Belt harm than the majority of land around Bilbrook/Codsall (site is 'moderate/high') Similar landscape sensitivity to the majority of land around Bilbrook/Codsall (site is 'moderate') Major positive impacts predicted against education in the Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development. Due to site size and location, unlikely to be able to deliver the required Codsall station car parking or required first school for Codsall/Bilbrook The site is within 2km walking distance to a railway station. <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma and other development options in Bilbrook/Codsall, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 213, 519, 224, SAD Site 228 and 419a&b.</p>
Codsall/Bilbrook	211	Land north of Manor House Park	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Lesser Green Belt harm than the majority of land around Bilbrook/Codsall (site is 'moderate') Similar landscape sensitivity to the majority of land around Bilbrook/Codsall (site is 'moderate') Due to site size and location, unlikely to be able to deliver the required Codsall station car parking or required first school for Codsall/Bilbrook The site is within 2km walking distance to a railway station. <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma and other development options in Bilbrook/Codsall, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 213, 519, 224, SAD Site 228 and 419a&b.</p>
Codsall/Bilbrook	221	Land at Dam Mill	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Lesser Green Belt harm than the majority of land around Bilbrook/Codsall (site is 'moderate/high') Similar landscape sensitivity to the majority of land around Bilbrook/Codsall (site is 'moderate') Major positive impacts predicted against education in the Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development. Due to site size and location, unlikely to be able to deliver the required Codsall station car parking or required first school for Codsall/Bilbrook Highways authority has raised initial concerns regarding site's access The site is within 2km walking distance to a railway station.

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma and other development options in Bilbrook/Codsall, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 213, 519, 224, SAD Site 228 and 419a&b.</p>
Codsall/Bilbrook	222	Land north of Sandy Lane	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Lesser Green Belt harm than the majority of land around Bilbrook/Codsall (site is 'moderate/high') • In a higher sensitivity landscape to the majority of land around Bilbrook/Codsall (site is 'moderate/high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development. • Potentially large enough to accommodate required first school, but no confirmation from site promoter that land is available to deliver this on the site, which is also smaller than other larger land parcels with potential to accommodate this around the villages • The site is within 2km walking distance to a railway station. <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma and other development options in Bilbrook/Codsall, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 213, 519, 224, SAD Site 228 and 419a&b.</p>
Codsall/Bilbrook	447	Land at Oaken Lodge, Oaken Lanes	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Lesser Green Belt harm than the majority of land around Bilbrook/Codsall (site is 'moderate/high') • In a higher sensitivity landscape to the majority of land around Bilbrook/Codsall (site is 'high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development. • Located in within 400m of Codsall Station, but is not as closely located to the station as other site option (Site 224) • Historic Environment Site Assessment indicates the potential for significant effects that may not be mitigated • The site is within 2km walking distance to a railway station. <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma and other development options in Bilbrook/Codsall, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 213, 519, 224, SAD Site 228 and 419a&b.</p>
Codsall/Bilbrook	500	Smallholding Barnhurst Lane	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • The site is within 2km walking distance to a railway station. • Higher Green Belt harm than the majority of land around the village (site is 'very high') • Similar landscape sensitivity to the majority of land around the village (site is 'moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal but failing to consider such areas for development may result in an unsustainable pattern of development. <p><u>Conclusion</u></p>

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			Having regard to all site assessment factors set out in the proforma and other development options in Bilbrook/Codsall, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 213, 519, 224, SAD Site 228 and 419a&b.
Codsall/Bilbrook	507	Land at Hollybush Lane East 1	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land around Bilbrook/Codsall (site is 'high') • In a higher sensitivity landscape to the majority of land around Bilbrook/Codsall (site is 'high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development. • Located in within 600m of Codsall Station, but is not as closely located to the station as other site options (e.g. Site 224) • Historic Environment Site Assessment indicates the potential for significant effects that may not be mitigated • Highways authority has raised initial concerns regarding site's access • The site is within 2km walking distance to a railway station. <p><u>Conclusion</u></p> <p>Having regard to all site assessment factors set out in the proforma and other development options in Bilbrook/Codsall, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 213, 519, 224, SAD Site 228 and 419a&b.</p>
Codsall/Bilbrook	515	Land off Heath House Lane	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Lesser Green Belt harm than the majority of land around Bilbrook/Codsall (site is 'moderate/high') • In a higher sensitivity landscape to the majority of land around Bilbrook/Codsall (site is 'moderate/high') • Major negative impacts predicted against education in the Sustainability Appraisal • Due to site size and location, unlikely to be able to deliver the required Codsall station car parking or required first school for Codsall/Bilbrook • The site is within 2km walking distance to a railway station. <p><u>Conclusion</u></p> <p>Having regard to all site assessment factors set out in the proforma and other development options in Bilbrook/Codsall, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 213, 519, 224, SAD Site 228 and 419a&b.</p>
Codsall/Bilbrook	630 a & b	Land at Moatbrook Lane	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Lesser Green Belt harm than the majority of land around Bilbrook/Codsall (site is 'moderate/high') • In a higher sensitivity landscape than the majority of land around Bilbrook/Codsall (site is 'moderate/high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development. • Major negative impacts predicted against education in the Sustainability Appraisal • Potentially large enough to accommodate required first school, but no confirmation from site promoter on this and site is smaller than other larger land parcels with potential to accommodate this around the villages

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<ul style="list-style-type: none"> The site is within 2km walking distance to a railway station. <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma and other development options in Bilbrook/Codsall, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 213, 519, 224, SAD Site 228 and 419a&b.</p>
Codsall/Bilbrook	703	Land north of Gunstone Lane	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Lesser Green Belt harm than the majority of land around Bilbrook/Codsall (site is 'moderate' and 'moderate/high') In a higher sensitivity landscape than the majority of land around Bilbrook/Codsall (site is 'moderate/high') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development. Due to site size and location, unlikely to be able to deliver the required Codsall station car parking or required first school for Codsall/Bilbrook Highways authority has raised initial concerns regarding site's access and pedestrian connectivity <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma and other development options in Bilbrook/Codsall, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 213, 519, 224, SAD Site 228 and 419a&b.</p>
Codsall/Bilbrook	735	Land west of Keepers Lane	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Similar Green Belt harm to the majority of land around Bilbrook/Codsall (site is 'high') In a higher sensitivity landscape than the majority of land around Bilbrook/Codsall (site is 'moderate/high') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development. Major positive impacts predicted against education and transport and accessibility in the Sustainability Appraisal Due to site size and location, unlikely to be able to deliver the required Codsall station car parking or required first school for Codsall/Bilbrook The site is within 2km walking distance to a railway station. <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma and other development options in Bilbrook/Codsall, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 213, 519, 224, SAD Site 228 and 419a&b.</p>
Codsall/Bilbrook	740	The Grange public house	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Unlike Green Belt site options around Bilbrook/Codsall, the land is a development boundary site Major positive impacts predicted against education and transport and accessibility in the Sustainability Appraisal Opportunity to redevelop brownfield land

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<ul style="list-style-type: none"> Due to site size and location, unlikely to be able to deliver the required Codsall station car parking or required first school for Codsall/Bilbrook Site does not currently appear to be available for development The site is within 2km walking distance to a railway station. <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma and other development options in Bilbrook/Codsall, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 213, 519, 224, SAD Site 228 and 419a&b.</p>
Cheslyn Hay/Great Wyrley	116	Land South of Wolverhampton Rd - Champions Wood Quarry	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Similar Green Belt harm to the majority of land around the village (site is 'high') Lesser landscape sensitivity than the majority of land around the village (site is 'low-moderate') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development. Site is in active use as a quarry Site is within a mineral safeguarding area for brick clay <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 523, 119a, 136, 638, 704, 730, 536a, SAD Site 141, SAD Site 136 and SAD Site 139.</p>
Cheslyn Hay/Great Wyrley	119b	Land adjoining Saredon Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Lower Green Belt harm than the majority of land around the village (site is 'low-moderate') Lesser landscape sensitivity than the majority of land around the village (site is 'low') Major positive impacts predicted against education in the Sustainability Appraisal Site is within a mineral safeguarding area for brick clay Highways authority raise initial concerns with impact on surrounding junctions <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 523, 119a, 136, 638, 704, 730, 536a, SAD Site 141, SAD Site 136 and SAD Site 139.</p>
Cheslyn Hay/Great Wyrley	120	Land adj. Wood Green	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Lower Green Belt harm than the majority of land around the village (site is 'low-moderate') Lesser landscape sensitivity than the majority of land around the village (site is 'low') Highways authority raise initial concerns with access and lack of pedestrian connectivity <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 523, 119a, 136, 638, 704, 730, 536a, SAD Site 141, SAD Site 136 and SAD Site 139.</p>
Cheslyn Hay/Great Wyrley	131	Land at Blacklees Farm, Warstone Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Similar Green Belt harm to the majority of land around the village (site is 'high')

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<ul style="list-style-type: none"> Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development. Contains significant areas of tree planting that may be lost if redeveloped Would require delivery of quarry to the north (Site 116) Site is within a mineral safeguarding area for brick clay Highways authority raise initial concerns with impact on surrounding junctions <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 523, 119a, 136, 638, 704, 730, 536a, SAD Site 141, SAD Site 136 and SAD Site 139.</p>
Cheslyn Hay/Great Wyrley	134	Home Farm, Walsall Road/Jacobs Hall Lane	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Lesser Green Belt harm than the majority of land around the village (site is 'moderate') Similar landscape sensitivity to the majority of land around the village (site is 'moderate') Loss of active employment uses from the site Site is previously developed land The site is within 2km walking distance to a railway station. <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 523, 119a, 136, 638, 704, 730, 536a, SAD Site 141, SAD Site 136 and SAD Site 139.</p>
Cheslyn Hay/Great Wyrley	136a	Land off Upper Landywood Lane (North)	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Lesser Green Belt harm than the majority of land around the village (site is 'moderate') Similar landscape sensitivity to the majority of land around the village (site is 'moderate') Area of high habitat distinctiveness Highways authority raise initial concerns with impact on surrounding junctions The site is within 2km walking distance to a railway station. <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 523, 119a, 136, 638, 704, 730, 536a, SAD Site 141, SAD Site 136 and SAD Site 139.</p>
Cheslyn Hay/Great Wyrley	137	Land off Upper Landywood Lane (South)	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Lesser Green Belt harm than the majority of land around the village (site is 'moderate-high') Similar landscape sensitivity to the majority of land around the village (site is 'moderate') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development. Highways authority raise initial concerns with impact on surrounding junctions The site is within 2km walking distance to a railway station. <p><u>Conclusion</u></p>

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 523, 119a, 136, 638, 704, 730, 536a, SAD Site 141, SAD Site 136 and SAD Site 139.
Cheslyn Hay/Great Wyrley	138	Leacroft Lane/Roman View	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Lesser Green Belt harm than the majority of land around the village (site is 'moderate-high') • Major positive impacts predicted against transport and accessibility criteria in Sustainability Appraisal • Major positive impacts predicted against education criteria in Sustainability Appraisal • Site layout significantly constrained by Flood Zones 2/3 and Local Wildlife Site – may affect ability to deliver a site with a satisfactory layout and capacity to accommodate affordable housing <p><u>Conclusion</u></p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 523, 119a, 136, 638, 704, 730, 536a, SAD Site 141, SAD Site 136 and SAD Site 139.</p>
Cheslyn Hay/Great Wyrley	440	land east of Love Lane	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Lesser Green Belt harm than the majority of land around the village (site is 'moderate') • Similar landscape sensitivity to the majority of land around the village (site is 'moderate') • Major positive impacts predicted against education criteria in Sustainability Appraisal • Highways authority raise initial concerns with achieving suitable access • The site is within 2km walking distance to a railway station. <p><u>Conclusion</u></p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 523, 119a, 136, 638, 704, 730, 536a, SAD Site 141, SAD Site 136 and SAD Site 139.</p>
Cheslyn Hay/Great Wyrley	489	Claypit, Quarry and land at Hawkins drive (Green Belt area)	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Lesser Green Belt harm than the majority of land around the village (site is 'low-moderate') • Lower landscape sensitivity than the majority of land around the village (site is 'low') • Major positive impacts predicted against education criteria in Sustainability Appraisal • Highways authority raise initial concerns with achieving suitable access • Development would result in loss of active minerals use • Site is within a mineral safeguarding area for brick clay <p><u>Conclusion</u></p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 523, 119a, 136, 638, 704, 730, 536a, SAD Site 141, SAD Site 136 and SAD Site 139.</p>
Cheslyn Hay/Great Wyrley	489	Claypit, Quarry and land at Hawkins drive (development boundary area)	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Site is within the development boundary • Major positive impacts predicted against education criteria in Sustainability Appraisal • Highways authority raise initial concerns with achieving suitable access • Development would result in loss of active minerals use

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<ul style="list-style-type: none"> Site is within a mineral safeguarding area for brick clay <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 523, 119a, 136, 638, 704, 730, 536a, SAD Site 141, SAD Site 136 and SAD Site 139.</p>
Cheslyn Hay/Great Wyrley	491	Landywood Enterprise Park, off Holly Lane	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Site is within the development boundary Major positive impacts predicted against transport and accessibility criteria in Sustainability Appraisal Highways authority raise initial concerns with achieving suitable access Loss of active employment uses from the site Site is previously developed land The site is within 2km walking distance to a railway station. <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 523, 119a, 136, 638, 704, 730, 536a, SAD Site 141, SAD Site 136 and SAD Site 139.</p>
Cheslyn Hay/Great Wyrley	525	Land north of Jones Lane	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Similar Green Belt harm to the majority of land around the village (site is 'high') imilar landscape sensitivity to the majority of land around the village (site is 'moderate') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development. Substantial area of high habitat distinctiveness between site and village Highways authority raise initial concerns with impact on surrounding junctions and landownership constraints The site is within 2km walking distance to a railway station. <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 523, 119a, 136, 638, 704, 730, 536a, SAD Site 141, SAD Site 136 and SAD Site 139.</p>
Cheslyn Hay/Great Wyrley	526	Land south of Jones Lane	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Similar Green Belt harm to the majority of land around the village (site is 'high') Similar landscape sensitivity to the majority of land around the village (site is 'moderate') Major negative impacts predicted against education in the Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development. Area of high habitat distinctiveness may be affected by site access Highways authority raise initial concerns with impact on surrounding junctions and landownership constraints The site is within 2km walking distance to a railway station.

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 523, 119a, 136, 638, 704, 730, 536a, SAD Site 141, SAD Site 136 and SAD Site 139.</p>
Cheslyn Hay/Great Wyrley	536b	Land off Holly Lane Part 2 (west of rail line)	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Northern part of site is similar Green Belt harm to the majority of land around the village (site is 'high'), but land to south is very high harm Similar landscape sensitivity to the majority of land around the village (site is 'moderate') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development. Highways authority advise against allocation of full site due to surrounding road network Historic Environment Site Assessment indicates the potential for significant effects that may not be mitigated The site is within 2km walking distance to a railway station. <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 523, 119a, 136, 638, 704, 730, 536a, SAD Site 141, SAD Site 136 and SAD Site 139.</p>
Cheslyn Hay/Great Wyrley	696	Land East of A34	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Higher Green Belt harm than the majority of land around the village (site is 'very high') Similar landscape sensitivity to the majority of land around the village (site is 'moderate') Major negative impacts predicted against education in the Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development. Highways authority raise initial concerns with impact on surrounding junctions at this scale Development would coalesce Newtown and Great Wyrley The site is within 2km walking distance to a railway station. <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 523, 119a, 136, 638, 704, 730, 536a, SAD Site 141, SAD Site 136 and SAD Site 139.</p>
Cheslyn Hay/Great Wyrley	741	Meadowbank Grange/Station Rd	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Site is within the development boundary Major positive impacts predicted against transport and accessibility criteria in Sustainability Appraisal Major positive impacts predicted against education criteria in Sustainability Appraisal Highways authority raise initial concerns due to loss of car parking use Site is previously developed land The site is within 2km walking distance to a railway station. <p><u>Conclusion</u></p>

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 523, 119a, 136, 638, 704, 730 536a, SAD Site 141, SAD Site 136 and SAD Site 139.
Wombourne	280	The Bratch, Bratch Lane	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Site is within the development boundary • Major positive impacts predicted against education in the Sustainability Appraisal • Highways authority raise initial concerns with achieving suitable access and pedestrian connectivity <p><u>Conclusion</u></p> <p>The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Wombourne	283	Land off Bridgnorth Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Majority of the site is on lesser Green Belt harm ('moderate') than the majority of land around the village, whilst a small part of the site's eastern extent being 'moderate-high' harm • Similar landscape sensitivity to the majority of land around the village (site is 'low-moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development. • Green Belt land not adjacent to a Tier 1 Settlement <p><u>Conclusion</u></p> <p>The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Wombourne	284	Land off Gilbert Lane	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Lesser Green Belt harm ('low-moderate') than the majority of land around the village • Higher landscape sensitivity than the majority of land around the village (site is 'moderate-high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. • Major positive impacts predicted against the education criteria in Sustainability Appraisal • Located in closest area of the village to Wombourne village centre • Green Belt land not adjacent to a Tier 1 Settlement <p><u>Conclusion</u></p> <p>The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Wombourne	286	land adj 62 Sytch Lane	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Lesser Green Belt harm ('low-moderate') than the majority of land around the village • Higher landscape sensitivity than the majority of land around the village (site is 'moderate-high') • Major positive impacts predicted against the education criteria in Sustainability Appraisal • Part previously developed land • Green Belt land not adjacent to a Tier 1 Settlement <p><u>Conclusion</u></p> <p>The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
Wombourne	298	Land off Bratch Lane/Trysull Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Lesser Green Belt harm ('low-moderate') than the majority of land around the village • Similar landscape sensitivity to the majority of land around the village (site is 'low-moderate') • Highways authority raise initial concerns with achieving suitable access and pedestrian connectivity • Green Belt land not adjacent to a Tier 1 Settlement <p><u>Conclusion</u></p> <p>The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Wombourne	305	Land at Bridgnorth Road/Heathlands	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Within development boundary • Site shape appears unable to accommodate residential layout • Development would affect area of TPOs <p><u>Conclusion</u></p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered suitable for allocation</p>
Wombourne	306	land adj Redcliffe Drive (Park Mount)	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Similar Green Belt harm ('moderate-high') to the majority of land around the village • Higher landscape sensitivity than the majority of land around the village (site is 'moderate-high') • Major positive impacts predicted against the education criteria in Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. • Highways authority raise initial concerns with achieving suitable access • Green Belt land not adjacent to a Tier 1 Settlement <p><u>Conclusion</u></p> <p>The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Wombourne	309	Land off Bridgnorth Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Similar Green Belt harm ('moderate-high') to the majority of land around the village • Similar landscape sensitivity to the majority of land around the village (site is 'low-moderate') • Highways authority raise initial concerns with achieving suitable access and cumulative impacts on nearby junctions • Major negative impacts predicted against the education criteria in Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. • Green Belt land not adjacent to a Tier 1 Settlement <p><u>Conclusion</u></p> <p>The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Wombourne	310a	Smestow Bridge Works, Bridgnorth Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Lower Green Belt harm ('low-moderate') than the majority of land around the village

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<ul style="list-style-type: none"> • Most of the site is of similar landscape sensitivity to the majority of land around the village (site is 'low-moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. • Highways authority raise initial concerns with achieving suitable access • Site is previously developed land • Would result in loss of existing occupied employment use, although this is a lower quality use and may be relocated • Green Belt land not adjacent to a Tier 1 Settlement <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Wombourne	310b	Smestow Bridge Works, Bridgnorth Road, Parcel 2	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Lower Green Belt harm ('low-moderate') than the majority of land around the village • Similar landscape sensitivity to the majority of land around the village (site is 'low-moderate') • Highways authority raise initial concerns with achieving suitable access • Site is previously developed land • Would result in loss of existing occupied employment use • Green Belt land not adjacent to a Tier 1 Settlement <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Wombourne	416a	Land off Orton Lane	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Similar Green Belt harm ('moderate-high') to the majority of land around the village • Higher landscape sensitivity than the majority of land around the village (site is 'moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. • Green Belt land not adjacent to a Tier 1 Settlement <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Wombourne	417	land adj Hartford House Pool House Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Lower Green Belt harm ('very low') than the majority of land around the village • Similar landscape sensitivity to the majority of land around the village (site is 'low-moderate') • Highways authority raise initial concerns with achieving suitable access • Site is previously developed land • Green Belt land not adjacent to a Tier 1 Settlement <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Wombourne	438	Land off Bratch Lane	<u>Key positives and negatives</u>

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<ul style="list-style-type: none"> • Lesser Green Belt harm ('low-moderate') than the majority of land around the village • Higher landscape sensitivity than the majority of land around the village (site is 'moderate') • Major positive impacts predicted against the education criteria in Sustainability Appraisal • Highways authority raise initial concerns with achieving suitable access and pedestrian connectivity • Green Belt land not adjacent to a Tier 1 Settlement <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Wombourne	458	Land off Poolhouse Road (former landfill site)	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Lower Green Belt harm ('moderate') than the majority of land around the village • Similar landscape sensitivity to the majority of land around the village (site is 'low-moderate') • Concerns from highways authority regarding pedestrian connectivity and isolation from village • Green Belt land not adjacent to a Tier 1 Settlement <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Wombourne	460	Land at Bridgnorth Road (Tata)	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Site is within the development boundary • Site is previously developed land • Significant areas of the site are within Flood Zone 2/3 and a Site of Biological Importance • Site is in an existing occupied employment use which would be lost if developed <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is not considered suitable for allocation.</p>
Wombourne	463a	Land off Billy Buns Lane (N)	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Higher Green Belt harm ('very high') than the majority of land around the village • Higher landscape sensitivity than the majority of land around the village (site is 'moderate-high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal and of both very high Green Belt harm and moderate/high landscape sensitivity. • Major positive impacts predicted against the education criteria in Sustainability Appraisal • Located close to Wombourne village centre • Green Belt land not adjacent to a Tier 1 Settlement <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Wombourne	463b	Land between Billy Buns Lane and Smallbrook Lane	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Lesser Green Belt harm ('low-moderate') than the majority of land around the village • Higher landscape sensitivity than the majority of land around the village (site is 'moderate-high') • Major positive impacts predicted against the education criteria in Sustainability Appraisal

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<ul style="list-style-type: none"> Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Located close to Wombourne village centre Green Belt land not adjacent to a Tier 1 Settlement <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Wombourne	463c	Land between Billy Buns Lane and Smallbrook Lane	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Lesser Green Belt harm ('low-moderate') than the majority of land around the village Higher landscape sensitivity than the majority of land around the village (site is 'moderate-high') Major positive impacts predicted against the education criteria in Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Located close to Wombourne village centre Green Belt land not adjacent to a Tier 1 Settlement <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Wombourne	463d	Land off Smallbrook Lane and Gilbert Lane	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Lesser Green Belt harm ('low-moderate') than the majority of land around the village Higher landscape sensitivity than the majority of land around the village (site is 'moderate-high') Major positive impacts predicted against the education criteria in Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Located close to Wombourne village centre Green Belt land not adjacent to a Tier 1 Settlement <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Wombourne	477	Land off Woodford Lane	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Lesser Green Belt harm ('moderate') than the majority of land around the village Similar landscape sensitivity to the majority of land around the village (site is 'low-moderate') Major positive impacts predicted against the education criteria in Sustainability Appraisal Highways authority raise initial concerns with achieving suitable access Green Belt land not adjacent to a Tier 1 Settlement <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Wombourne	554	Land off Trysull Road - Bratch Common	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Lesser Green Belt harm ('moderate') than the majority of land around the village Similar landscape sensitivity to the majority of land around the village (site is 'low-moderate')

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<ul style="list-style-type: none"> Highways authority raise initial concerns with achieving suitable access and cumulative impacts on nearby junctions Green Belt land not adjacent to a Tier 1 Settlement <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Wombourne	626	Land off Bridgnorth Road/Wombourne Road - Parcel A	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm ('moderate-high') to the majority of land around the village Similar landscape sensitivity to the majority of land around the village (site is 'low-moderate') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Wombourne	627	Land off Bridgnorth Road/Wombourne Road - Parcel B	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm ('moderate-high') to the majority of land around the village Similar landscape sensitivity to the majority of land around the village (site is 'low-moderate') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Wombourne	628	Land off Bridgnorth Road/Wombourne Road - Parcel C	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm ('moderate-high') to the majority of land around the village Similar landscape sensitivity to the majority of land around the village (site is 'low-moderate') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Wombourne	629	Land off Bridgnorth Road/Wombourne Road - Parcel D	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm ('moderate-high') to the majority of land around the village Similar landscape sensitivity to the majority of land around the village (site is 'low-moderate') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Wombourne	701	Land at Longdon	<u>Key positives and negatives</u>

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm ('moderate-high') to the majority of land around the village Higher landscape sensitivity to the majority of land around the village (site is 'moderate-high') Major positive impacts predicted against the education criteria in Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Highways authority raise initial concerns with achieving suitable access and pedestrian connectivity <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Wombourne	708	Land west of Strathmore Crescent	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm ('moderate-high') to the majority of land around the village Higher landscape sensitivity to the majority of land around the village (site is 'moderate') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Wombourne	738	Wagon and Horses public house	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> The site is within the development boundary, unlike other Green Belt site options around the village The site's development would result in the loss of an existing essential community facility <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is not considered suitable for allocation.</p>
Brewood	057	Garage and parking area Coneybere Gardens	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Development boundary site Unlikely to be able to deliver net residential growth at an appropriate density <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is not considered suitable for allocation.</p>
Brewood	062	Land adjacent to The Woodlands, Coven Rd	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land around the village (site is 'moderate-high') Similar landscape sensitivity to the majority of land around the village (site is 'high') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Highways authority raise initial concerns with achieving site access <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
Brewood	067	Land off Coven Road, Brewood	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land around the village (site is 'moderate-high') Similar landscape sensitivity to the majority of land around the village (site is 'high') Major negative impacts predicted against education in the Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. <p><u>Conclusion</u></p> <p>The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Brewood	074	Site 1 land rear Oak Cottage, Kiddemore Green Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land around the village (site is 'moderate-high') Similar landscape sensitivity to the majority of land around the village (site is 'high') <p>Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal.</p> <p><u>Conclusion</u></p> <p>The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Brewood	075 & 075a	Site 2 land adj 56 Kiddemore Green Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land around the village (site is 'moderate-high') Similar landscape sensitivity to the majority of land around the village (site is 'high') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. <p><u>Conclusion</u></p> <p>The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Brewood	076	Site 3 land off Dirty Lane	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement. Lesser Green Belt harm than the majority of land around the village (site is 'moderate') Similar landscape sensitivity to the majority of land around the village (site is 'high') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Highways authority raise initial concerns with achieving site access <p><u>Conclusion</u></p> <p>The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Brewood	076a	Land off Dirty Lane	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Lesser Green Belt harm than the majority of land around the village (site is 'moderate') Similar landscape sensitivity to the majority of land around the village (site is 'high') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal.

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<ul style="list-style-type: none"> Highways authority raise initial concerns with achieving site access <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Brewood	078	Land at Port Lane and west of Coven Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land around the village (site is 'moderate-high') Similar landscape sensitivity to the majority of land around the village (site is 'high') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Brewood	079	land south Kiddemore Green Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Lesser Green Belt harm than the majority of land around the village (site is 'moderate') Similar landscape sensitivity to the majority of land around the village (site is 'high') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Brewood	376	Land at Fallowfields Barn, Barn Lane	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land around the village (site is 'moderate-high') Lesser landscape sensitivity than the majority of land around the village (site is 'moderate-high') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Highways authority raise initial concerns with connectivity <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Brewood	611	Land off Port Lane - Coven Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land around the village (site is 'moderate-high') Similar landscape sensitivity to the majority of land around the village (site is 'high') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Brewood	616	Land at Melwood, Tinkers Lane	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land around the village (site is 'moderate-high') • Similar landscape sensitivity to the majority of land around the village (site is 'high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. • Highways authority raise initial concerns with access <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Brewood	658	Land at Oakwood	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Green Belt land not adjacent to a Tier 1 Settlement • Similar Green Belt harm to the majority of land around the village (site is 'moderate-high') • Lesser landscape sensitivity than the majority of land around the village (site is 'moderate-high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. • Highways authority raise initial concerns with site access <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Kinver	272	Land East of Dunsley Drive	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Green Belt land not adjacent to a Tier 1 Settlement • Lower Green Belt harm than the majority of land around the village (site is 'moderate') • Similar landscape sensitivity to the majority of land around the village (site is 'moderate-high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. • Historic Environment Site Assessment indicates the potential for significant effects that may not be mitigated <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Kinver	273	North of White Hill	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Green Belt land not adjacent to a Tier 1 Settlement • Lower Green Belt harm than the majority of land around the village (site is 'moderate') • Similar landscape sensitivity to the majority of land around the village (site is 'moderate-high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal.. • Highways authority raise initial concerns with access and lack of footway <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Kinver	409	land adj Edge View Home, Comber Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Green Belt land not adjacent to a Tier 1 Settlement • Lower Green Belt harm than the majority of land around the village (site is 'moderate') • Higher landscape sensitivity than the majority of land around the village (site is 'high')

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<ul style="list-style-type: none"> Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Highways authority raise initial concerns with access road and lack of footway Historic Environment Site Assessment indicates the potential for significant effects that may not be mitigated Site access may affect TPOs/trees in Conservation Area <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Kinver	546	Land at Church Hill	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land around the village (site is 'moderate-high') Higher landscape sensitivity than the majority of land around the village (site is 'high') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Site access may affect TPOs/trees in Conservation Area <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Kinver	549	Land north of Dunsley Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Eastern part of the site is of greater Green Belt harm ('high') than the majority of land around the village, whilst western portion of site is an area of lesser Green Belt harm ('moderate') Similar landscape sensitivity to the majority of land around the village (site is 'moderate-high') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Highways authority raise initial concerns with footway connectivity to site <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Kinver	576	Land off Hyde Lane (west)	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Lower Green Belt harm than the majority of land around the village (site is 'moderate') Similar landscape sensitivity to the majority of land around the village (site is 'moderate-high') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Perton	238	Land at former Perton Court Farm	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land around the village (site is 'moderate-high') Similar landscape sensitivity to the majority of land around the village (site is 'moderate')

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<ul style="list-style-type: none"> Major negative impacts predicted against education in the Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal.. Highways authority raise initial concerns with impact on surrounding junctions Could result in coalescence of Wolverhampton urban area and Perton <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Perton	241	Land off Dippons Lane	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land around the village (site is 'moderate-high') Similar landscape sensitivity to the majority of land around the village (site is 'moderate') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Highways authority raise initial concerns with site access <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Perton	246a	Bradshaws Estate, Holyhead Rd	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Higher Green Belt harm than the majority of land around the village (site is 'very high') Higher landscape sensitivity than the majority of land around the village (site is 'moderate-high') Major negative impacts predicted against education in the Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal and of both very high Green Belt harm and moderate/high landscape sensitivity. Highways authority raise initial concerns with impact on surrounding junctions <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Perton	402	land rear of Winceby Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Lower Green Belt harm than the majority of land around the village (site is 'low-moderate') Similar landscape sensitivity to the majority of land around the village (site is 'moderate') Highways authority raise initial concerns that suitable site access cannot be achieved and also regarding impact on surrounding junctions <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Perton	407	land west of Wrottesley Park Road (north)	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Higher Green Belt harm than the majority of land around the village (site is 'high')

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<ul style="list-style-type: none"> • Similar landscape sensitivity to the majority of land around the village (site is 'moderate') • Major negative impacts predicted against education in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Perton	454	Land off Dippons Lane/Rear Idonia Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Green Belt land not adjacent to a Tier 1 Settlement • Similar Green Belt harm than the majority of land around the village (site is 'moderate-high') • Similar landscape sensitivity to the majority of land around the village (site is 'moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. • Highways authority raise initial concerns with site access <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Perton	505	Land rear Dunster Grove	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Green Belt land not adjacent to a Tier 1 Settlement • Lower Green Belt harm than the majority of land around the village (site is 'low' and 'low-moderate') • Similar landscape sensitivity to the majority of land around the village (site is 'moderate') • Highways authority raise initial concerns with site access • Could result in coalescence of Wolverhampton urban area and Perton <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Perton	506	Land off Westcroft Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Green Belt land not adjacent to a Tier 1 Settlement • Similar Green Belt harm than the majority of land around the village (site is 'moderate-high') • Similar landscape sensitivity to the majority of land around the village (site is 'moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. • Highways authority raise initial concerns with site access <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Perton	705	Perton Golf Course	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Green Belt land not adjacent to a Tier 1 Settlement • Higher Green Belt harm than the majority of land around the village (site is 'high') • Similar landscape sensitivity to the majority of land around the village (site is 'moderate') • Major negative impacts predicted against education in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal.

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<ul style="list-style-type: none"> Highways authority raise initial concerns with site access and impact on surrounding junctions <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Huntington	017	Land off Almond Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land around the village (site is 'high') Similar landscape sensitivity to the majority of land around the village (site is 'moderate-high') Major negative impacts predicted against education criteria in the Sustainability Appraisal Major negative impacts predicted against landscape criteria in the Sustainability Appraisal due to proximity to Cannock Chase AONB <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Huntington	022	Land off Hawthorne Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land around the village (site is 'high') Similar landscape sensitivity to the majority of land around the village (site is 'moderate-high') Major negative impacts predicted against education criteria in the Sustainability Appraisal Major negative impacts predicted against landscape criteria in the Sustainability Appraisal due to the site's proximity to Cannock Chase AONB <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Huntington	591	Land at Oaklands Farm (north of Limepit Lane)	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land around the village (site is 'high') Similar landscape sensitivity to the majority of land around the village (site is 'moderate-high') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. The Cannock Chase AONB Partnership have objected to development which erodes the separation between Huntington and Cannock <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Huntington	592	Land at Oaklands Farm (south of Limepit Lane)	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land around the village (site is 'high') Similar landscape sensitivity to the majority of land around the village (site is 'moderate-high') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal.

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<ul style="list-style-type: none"> The Cannock Chase AONB Partnership have objected to development which erodes the separation between Huntington and Cannock <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Huntington	732	Land north of Cocksparrow Lane	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land around the village (site is 'high') Lower landscape sensitivity than the majority of land around the village (site is 'moderate') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Initial highways concerns raised regarding access <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Essington	150	Land adjoining High Hill Rd, Essington	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Lower Green Belt harm to the majority of land in this broad location (site is 'moderate-high') Similar landscape sensitivity to the majority of land in this broad location (site is 'low-moderate') Major negative impacts predicted against education in the Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well as to warrant a departure from the Council's preferred Spatial Housing Strategy.</p>
Essington	151/662	Land between M6 & Essington and adj. Bursnips Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Lower Green Belt harm than the majority of land in this broad location (site is 'moderate-high') Similar landscape sensitivity to the majority of land in this broad location (site is 'low-moderate') Major negative impacts predicted against education in the Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Highways authority raise initial concerns with impact on surrounding junctions and pedestrian connectivity <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well as to warrant a departure from the Council's preferred Spatial Housing Strategy.</p>
Essington	154	South Side of High Hill, Essington	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land in this broad location (site is 'high') Similar landscape sensitivity to the majority of land in this broad location (site is 'low-moderate') Major negative impacts predicted against education in the Sustainability Appraisal

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<ul style="list-style-type: none"> Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. May result in loss of existing public open space (allotments) <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well as to warrant a departure from the Council's preferred Spatial Housing Strategy.</p>
Essington	157	Hill Street, Essington	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Development boundary site Previously developed land May not be deliverable due to site availability and loss of car parking <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is not considered suitable for allocation.</p>
Essington	164 / 164a	Land at Bursnips Road/Sneyd Lane	The landownership information on these plots has substantially changed since the 2021 SHELAA, to the extent these are no longer reasonable alternatives and have been replaced by Sites 163 and 163a.
Essington	471	Land at Bognop Road, Essington	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land in this broad location (site is 'high') Similar landscape sensitivity to the majority of land in this broad location (site is 'low-moderate') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Highways authority raise initial concerns with impact on surrounding junctions and pedestrian connectivity <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well as to warrant a departure from the Council's preferred Spatial Housing Strategy.</p>
Coven	082a	Land between A449 Stafford Rd and School Lane, Coven	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement The site is in lower Green Belt harm than the majority of land around the village (site is 'moderate') The site is in an area of similar landscape sensitivity to the majority of land around the village ('moderate') <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Coven	084a	Land off Birchcroft, Coven	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Lower Green Belt harm than the majority of land around the village (site is 'moderate-high') Similar landscape sensitivity to the majority of land around the village (site is 'moderate') Major negative impacts predicted against education in the Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. <p><u>Conclusion</u></p>

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.
Coven	085	Land at Grange Farm, Coven	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Lower Green Belt harm than the majority of land around the village (site is 'low-moderate') Similar landscape sensitivity to the majority of land around the village (site is 'moderate') Highways authority raise initial concerns with site access <p><u>Conclusion</u></p> <p>The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Coven	087	Land at Stadacona, Stafford, Coven	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Lower Green Belt harm than the majority of land around the village (site is 'low-moderate') Similar landscape sensitivity to the majority of land around the village (site is 'moderate') Highways authority raise initial concerns with site access, as this could only be achieved via the A449 <p><u>Conclusion</u></p> <p>The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Coven	615	Land west of School Lane, Coven	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Lower Green Belt harm than the majority of land around the village (site is 'moderate') Similar landscape sensitivity to the majority of land around the village (site is 'moderate') Major negative impacts predicted against education in the Sustainability Appraisal Highways authority raise initial concerns with site access and pedestrian connectivity <p><u>Conclusion</u></p> <p>The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Coven	618	Land west A449	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land around the village (site is 'high') Similar landscape sensitivity to the majority of land around the village (site is 'moderate') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Highways authority raise initial concerns with site access and pedestrian connectivity <p><u>Conclusion</u></p> <p>The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Coven	739	Croft Garage	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Development boundary site Site is occupied by other commercial uses and is not available for residential development

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Featherstone	169	Featherstone Hall Farm, New Road, Featherstone	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land around the village (site is 'moderate-high') Lower landscape sensitivity than the majority of land around the village (site is 'low-moderate') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Highways authority raise initial concerns with highways capacity in surrounding area <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Featherstone	170	Land east of Brookhouse Lane, Featherstone	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Lesser Green Belt harm than the majority of land around the village (site is 'moderate') Lower landscape sensitivity than the majority of land around the village (site is 'low-moderate') Highways authority raise initial concerns with highways capacity in surrounding area <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Featherstone	172	Land at Cannock Road, Featherstone	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Higher Green Belt harm than the majority of land around the village (site is 'high') Similar landscape sensitivity to the majority of land around the village (site is 'moderate') Major negative impacts predicted against the education criteria in the Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Historic Environment Site Assessment indicates the potential for significant effects that may not be mitigated Highways authority raise initial concerns with highways capacity in surrounding area Area of poor pedestrian connectivity between site and wider village <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Featherstone	396	Land off New Road/East Road, Featherstone	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land around the village (site is 'moderate-high') Lower landscape sensitivity than the majority of land around the village (site is 'low-moderate') Major negative impacts predicted against the education criteria in the Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal.

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<ul style="list-style-type: none"> Highways authority raise initial concerns with highways capacity in surrounding area <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Featherstone	527	Land north of New Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement. Similar Green Belt harm to the majority of land around the village (site is 'moderate-high') Similar landscape sensitivity to the majority of land around the village (site is 'moderate') Major negative impacts predicted against the education criteria in the Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Highways authority raise initial concerns with highways capacity in surrounding area <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Featherstone	742	Red White and Blue public house	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Development boundary site Site is occupied by an essential community facility and is not available for residential development <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is not considered suitable for allocation.</p>
Featherstone	743	Land off New Road, Featherstone	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Lower Green Belt harm to the majority of land around the village (site is 'moderate') Lower landscape sensitivity than the majority of land around the village (site is 'low-moderate') Highways authority raise initial concerns with suitability of site access and pedestrian connectivity <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Shareshill	181	Land at the rear of Tanglewood, Elms Lane Shareshill	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Higher Green Belt harm than the majority of land in this broad location (site is 'high') Higher landscape sensitivity than the majority of land in this broad location (site is 'moderate') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Highways authority raise initial concerns with highways capacity in surrounding area Site does not appear to have pedestrian access into wider settlement <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well as to warrant a departure from the Council's preferred Spatial Housing Strategy.</p>
Shareshill	183	Land off Swan Lane, Shareshill	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land in this broad location (site is 'moderate-high') • Higher landscape sensitivity than the majority of land in this broad location (site is 'moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. • Highways authority raise initial concerns with highways capacity in surrounding area • Site does not appear to have pedestrian access into wider settlement <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well as to warrant a departure from the Council's preferred Spatial Housing Strategy.</p>
Shareshill	184	Land east of Manor Drive, Shareshill	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Green Belt land not adjacent to a Tier 1 Settlement • Lower Green Belt harm than the majority of land in this broad location (site is 'moderate') • Higher landscape sensitivity than the majority of land in this broad location (site is 'moderate') • Highways authority raise initial concerns with highways capacity in surrounding area, surrounding junctions and pedestrian connectivity <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well as to warrant a departure from the Council's preferred Spatial Housing Strategy.</p>
Shareshill	185	Land off Manor Drive (south), Shareshill	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Green Belt land not adjacent to a Tier 1 Settlement • Lower Green Belt harm than the majority of land in this broad location (site is 'moderate') • Higher landscape sensitivity than the majority of land in this broad location (site is 'moderate') • Highways authority raise initial concerns with highways capacity in surrounding area, surrounding junctions and pedestrian connectivity <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well as to warrant a departure from the Council's preferred Spatial Housing Strategy.</p>
Wheaton Aston	090	The Paddock, Hawthorn Drive	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Part of the site is Green Belt land not adjacent to a Tier 1 Settlement • Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate-high') • Unlike other land around the village, part of the site is within the Green Belt • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. • Highways authority raise initial concerns with access <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well that it should be allocated.</p>
Wheaton Aston	091	Land at Brooklands	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate-high') • Unlike other land around the village, part of the site is within the Green Belt

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<ul style="list-style-type: none"> Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Highways authority raise initial concerns with access <u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well that it should be allocated.
Wheaton Aston	092	Back Lane/Mill Lane	<u>Key positives and negatives</u> <ul style="list-style-type: none"> Lesser landscape sensitivity than the majority of land in this broad location (site is 'moderate'). Highways authority raise initial concerns with access <u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well that it should be allocated.
Wheaton Aston	094	Land off Primrose Close	<u>Key positives and negatives</u> <ul style="list-style-type: none"> Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate-high') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Does not appear to have existing pedestrian access into the wider village <u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well that it should be allocated.
Wheaton Aston	377/093	land adj Brook House Farm	<u>Key positives and negatives</u> <ul style="list-style-type: none"> Lesser landscape sensitivity than the majority of land in this broad location (site is 'moderate'). Highways authority raise initial concerns with access <u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well that it should be allocated.
Wheaton Aston	378	Land off Broadholes Lane/Badgers End	Split into Site 378a and 378b as these are in separate land ownerships and there is no agreement to promote these two parcels jointly. Site 378b is 'unsuitable' in SHELAA so not a reasonable alternative.
Wheaton Aston	378a	Land off Broadholes Lane/Badgers End	<u>Key positives and negatives</u> <ul style="list-style-type: none"> Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate-high') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Does not appear to have existing pedestrian access into the wider village <u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well that it should be allocated.
Wheaton Aston	379	Land off Back Lane/Ivetsey Close	<u>Key positives and negatives</u> <ul style="list-style-type: none"> Lesser landscape sensitivity than the majority of land in this broad location (site is 'moderate'). No existing footway access into the village without joint delivery alongside SAD Site 379 Would not deliver a small site (<1ha) if delivered alongside SAD Site 379 <u>Conclusion</u>

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well it should be allocated.
Wheaton Aston	382	land rear Meadowcroft Gardens/Hawthorne Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate-high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. • No willing landowner – suggested by third party • No pedestrian access into wider village <p><u>Conclusion</u></p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well that it should be allocated.</p>
Wheaton Aston	426b	Bridge Farm 54 Long Street	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate-high'). • No existing footway access into the village without joint delivery alongside Site 426a • Would not deliver a small site (<1ha) if delivered alongside Site 426a <p><u>Conclusion</u></p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well that it should be allocated.</p>
Wheaton Aston	608	Land adj Fenton House Lane	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate-high'). <p><u>Conclusion</u></p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well it should be allocated.</p>
Wheaton Aston	610	Land off Marston Rd - Fenton House Lane	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate-high') • Adjacent to a key local facility (primary school) <p><u>Conclusion</u></p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well that it should be allocated.</p>
Wheaton Aston	614	Land off Back Lane	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Lesser landscape sensitivity than the majority of land in this broad location (site is 'moderate'). • Highways authority raise initial concerns with access <p><u>Conclusion</u></p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well that it should be allocated.</p>
Wheaton Aston	619	Land off Fenton House Lane 2	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate-high'). <p><u>Conclusion</u></p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated.</p>

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
Pattingham	249	land adjacent Meadowside, off High Street	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land around the village (site is 'moderate-high') Higher landscape sensitivity than the majority of land around the village (site is 'high') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Highways authority raise initial concerns with achieving suitable access and pedestrian connectivity <p><u>Conclusion</u></p> <p>The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Pattingham	250	Land off Patshull Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land around the village (site is 'moderate-high') Higher landscape sensitivity than the majority of land around the village (site is 'high') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Highways authority raise initial concerns with achieving suitable access and pedestrian connectivity <p><u>Conclusion</u></p> <p>The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Pattingham	251 (Green Belt)	Hall End Farm	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Majority of the site is of lesser Green Belt harm than the majority of land around the village (site is 'moderate') Similar landscape sensitivity to the majority of land around the village (site is 'moderate') Highways authority raise initial concerns with achieving suitable access and pedestrian connectivity <p><u>Conclusion</u></p> <p>The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Pattingham	252	Land off Clive Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Small part of the site nearest village is of lesser Green Belt harm ('moderate') than the majority of land around the village, remainder is of similar harm ('moderate-high') Similar landscape sensitivity to the majority of land around the village (site is 'moderate') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Highways authority raise initial concerns with achieving suitable access and pedestrian connectivity <p><u>Conclusion</u></p> <p>The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Pattingham	253	Land off Westbeech Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<ul style="list-style-type: none"> Small part of the site nearest village is of lesser Green Belt harm ('moderate') than the majority of land around the village, remainder is of similar harm ('moderate-high') Similar landscape sensitivity to the majority of land around the village (site is 'moderate') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Highways authority raise initial concerns with achieving suitable access <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Pattingham	255	Land off Moor Lane	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Lesser Green Belt harm than the majority of land around the village (site is 'moderate') Similar landscape sensitivity to the majority of land around the village (site is 'moderate') <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Pattingham	257	Land at Highgate Farm, Wolverhampton Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land around the village (site is 'moderate-high') Higher landscape sensitivity than the majority of land around the village (site is 'high') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Highways authority raise initial concerns with lack of pedestrian connectivity <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Pattingham	400	Land off Westbeech Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land around the village (site is 'moderate-high') Higher landscape sensitivity than the majority of land around the village (site is 'high') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Lack of pedestrian connections to wider village <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Pattingham	401	Land adj Beech House Farm	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land around the village (site is 'moderate-high') Similar landscape sensitivity than the majority of land around the village (site is 'high') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Highways authority raise initial concerns with suitability of site access and pedestrian connectivity

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Pattingham	421	land between Rudge Road and Marlbrook Lane, Pattingham	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Green Belt land not adjacent to a Tier 1 Settlement • Similar Green Belt harm to the majority of land around the village (site is 'moderate-high') • Similar landscape sensitivity than the majority of land around the village (site is 'moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. • Highways authority raise initial concerns with suitability of site access and pedestrian connectivity • Area of high habitat distinctiveness <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Swindon	312a	Land off Church Road/St John's Close, Swindon	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Green Belt land not adjacent to a Tier 1 Settlement • Lesser Green Belt harm than the majority of land around the village (site is 'moderate-high') • Similar landscape sensitivity to the majority of land around the village (site is 'low-moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. • Unlikely to deliver affordable housing <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Swindon	313 (safeguarded land)	Land off Himley Lane (Site 1)	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • In non-Green Belt safeguarded land allocated as safeguarded land in Site Allocations Document 2018 • The site is an irregular shape which will make it very challenging to develop. Development of the site would not accord well with the existing settlement pattern. <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is not considered suitable for allocation.</p>
Swindon	313 (Green Belt site)	Land off Himley Lane (Site 1),	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Green Belt land not adjacent to a Tier 1 Settlement • Similar and higher Green Belt harm than the majority of land around the village ('moderate') • Similar landscape sensitivity to the majority of land around the village (site is 'low-moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Swindon	314	Land off Wombourne Road (Site 2)	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Green Belt land not adjacent to a Tier 1 Settlement

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<ul style="list-style-type: none"> • Lesser Green Belt harm than the majority of land around the village (site is 'moderate-high') • Similar landscape sensitivity to the majority of land around the village (site is 'low-moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Swindon	315	Land off Himley Lane (Site 3)	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Green Belt land not adjacent to a Tier 1 Settlement • Majority of the site is higher Green Belt harm ('very high') than majority of other land around the village, with some limited areas adjacent the development boundary of similar Green belt harm to the majority of other land ('high') • Similar landscape sensitivity to the majority of land around the village (site is 'low-moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy</p>
Swindon	412	Land off High Street/Brooklands, Swindon	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Green Belt land not adjacent to a Tier 1 Settlement • Lesser Green Belt harm than the majority of land around the village (site is 'moderate') • Similar landscape sensitivity to the majority of land around the village (site is 'low-moderate') • Not currently available • Flood zone may constrain layout/access <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 313. The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Swindon	437	Land off Church Rd/rear Baldwin Way	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Green Belt land not adjacent to a Tier 1 Settlement • Lesser Green Belt harm than the majority of land around the village (site is 'moderate-high') • Similar landscape sensitivity to the majority of land around the village (site is 'low-moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal.. • Highways authority raise initial concerns with pedestrian connectivity to wider village <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Swindon	682	Reynolds Close, Swindon	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Green Belt land not adjacent to a Tier 1 Settlement • Similar Green Belt harm to the majority of land around the village (site is 'high')

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<ul style="list-style-type: none"> Similar landscape sensitivity to the majority of land around the village (site is 'low-moderate') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Highways authority raise initial concerns with site access <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Swindon	717	Land west of Church Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement. Similar Green Belt harm to the majority of land around the village (site is 'high') Similar landscape sensitivity to the majority of land around the village (site is 'low-moderate') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Highways authority raise initial concerns with site access <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Swindon	718	Land west of Church Road 2	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land around the village (site is 'high') Similar landscape sensitivity to the majority of land around the village (site is 'low-moderate') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Highways authority raise initial concerns with pedestrian connectivity into wider settlement <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Bednall	023	Land West of Church Farm	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land in this broad location (site is 'moderate-high') Similar landscape sensitivity to the majority of land in this broad location (site is 'high') Major negative impacts predicted against employment criteria in the Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Site does not appear to have footway access to facilities in wider village <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Bednall	024	Land at Bednall Hall Farm	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land in this broad location (site is 'moderate-high') Similar landscape sensitivity to the majority of land in this broad location (site is 'high') Major negative impacts predicted against employment criteria in the Sustainability Appraisal

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<ul style="list-style-type: none"> Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Highways authority raise initial concerns with access and pedestrian connectivity Site does not appear to have footway access to facilities in wider village <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Bednall	026	Lower Bednall Farm-Site B	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land in this broad location (site is 'moderate-high') Similar landscape sensitivity to the majority of land in this broad location (site is 'high') Major negative impacts predicted against employment criteria in the Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Highways authority raise initial concerns with access Site does not appear to have footway access to facilities in wider village <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Dunston	029a	School Lane	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Similar landscape sensitivity to the majority of land in this broad location (site is 'low-moderate') Highways authority raise initial concerns with access <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma and the relative sustainability of Tier 4 settlements, the site is not considered to perform so well as to warrant allocation.</p>
Dunston	487	Land rear The Cottage	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Similar landscape sensitivity to the majority of land in this broad location (site is 'low-moderate') Highways authority raise initial concerns with access <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma and the relative sustainability of Tier 4 settlements, the site is not considered to perform so well as to warrant allocation.</p>
Dunston	588	Dunston Dairy Farm	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Similar landscape sensitivity to the majority of land in this broad location (site is 'low-moderate') Major negative impacts predicted against education criteria in the Sustainability Appraisal Highways authority raise initial concerns with access <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma and the relative sustainability of Tier 4 settlements, the site is not considered to perform so well as to warrant allocation.</p>
Bishops Wood	096	Land off Offoxey Road and Ivetsey Bank Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land in this broad location (site is 'moderate-high')

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<ul style="list-style-type: none"> Similar landscape sensitivity to the majority of land in this broad location (site is 'high') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Bishops Wood	097	Land south of Bishops Wood	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land in this broad location (site is 'moderate-high') Similar landscape sensitivity to the majority of land in this broad location (site is 'high') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Site does not appear to have footway access to facilities in wider village <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Bishops Wood	099	Land off Ivetsey Bank Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land in this broad location (site is 'moderate-high') Similar landscape sensitivity to the majority of land in this broad location (site is 'high') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Highways authority raise initial concerns with lack of pedestrian connectivity <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Bobbington	319	Land west of Six Ashes Rd	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land in this broad location (site is 'moderate') Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate') Major negative impacts predicted against employment criteria in the Sustainability Appraisal <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Bobbington	320	Land rear of 19 Six Ashes Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land in this broad location (site is 'moderate') Higher landscape sensitivity than the majority of land in this broad location (site is 'moderate-high') Major negative impacts predicted against employment criteria in the Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Highways authority raise initial concerns with site access Site does not appear to have footway access into wider village

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Bobbington	321	Land adj. Bannockburn, Six Ashes Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Green Belt land not adjacent to a Tier 1 Settlement • Higher Green Belt harm than the majority of land in this broad location (site is 'moderate-high') • Higher landscape sensitivity than the majority of land in this broad location (site is 'high') • Major negative impacts predicted against employment criteria in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Bobbington	410	Land adj Corbett Primary School, Six Ashes Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Green Belt land not adjacent to a Tier 1 Settlement • Higher Green Belt harm than the majority of land in this broad location (site is 'moderate-high') • Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate') • Major negative impacts predicted against employment criteria in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Trysull	327	Land adj the Vicarage school	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Green Belt land not adjacent to a Tier 1 Settlement • Lesser Green Belt harm than the majority of land in this broad location (site is 'low-moderate') • Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate-high') • Major negative impacts predicted against employment criteria in the Sustainability Appraisal • Major negative impacts predicted against transport and accessibility criteria in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. • Highways authority raise initial concerns with access <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Trysull	328	Land to rear Manor House, Seisdon Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Green Belt land not adjacent to a Tier 1 Settlement • Lesser Green Belt harm than the majority of land in this broad location (site is 'low-moderate') • Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate-high') • Major negative impacts predicted against employment criteria in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. • Highways authority raise initial concerns with access

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Trysull	329	Land rear of "The Plough" Public House, School Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Green Belt land not adjacent to a Tier 1 Settlement • Lesser Green Belt harm than the majority of land in this broad location (site is 'low-moderate') • Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate-high') • Major negative impacts predicted against employment criteria in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. • Highways authority raise initial concerns with access <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Trysull	544	Land adj the Manor House 2	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Green Belt land not adjacent to a Tier 1 Settlement • Similar Green Belt harm to the majority of land in this broad location (site is 'moderate') • Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate-high') • Major negative impacts predicted against employment criteria in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. • Highways authority raise initial concerns with access <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Trysull	558	Land off Crockington Lane	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Green Belt land not adjacent to a Tier 1 Settlement • Similar Green Belt harm to the majority of land in this broad location (site is 'moderate') • Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate-high') • Major negative impacts predicted against employment criteria in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. • Highways authority raise initial concerns with access and pedestrian connectivity <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Seisdon	358	Land between Post Office Road & Fox Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Green Belt land not adjacent to a Tier 1 Settlement • Similar Green Belt harm to the majority of land in this broad location (site is 'moderate') • Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate-high') • Major negative impacts predicted against the education criteria in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal.

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Seisdon	359	Land adj Home Farm, Crockington Lane	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Higher Green Belt harm than the majority of land in this broad location (site is 'moderate-high') Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate-high') Major negative impacts predicted against the education criteria in the Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Highways authority raise initial concerns with access <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Seisdon	671	Land West of Fox Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land in this broad location (site is 'moderate') Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate-high') Major negative impacts predicted against the education criteria in the Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Seisdon	702	Land off Fox Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Higher Green Belt harm than the majority of land in this broad location (site is 'moderate-high') Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate-high') Major negative impacts predicted against the education criteria in the Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Highways authority raise initial concerns with access <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Himley	335a	The Limes, Plantation Lane	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Site is within the development boundary, unlike other site options around the village Major negative impacts predicted against education criteria in the Sustainability Appraisal Highways authority raise initial concerns with access <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma and the relative sustainability of Tier 4 settlements, the site is not considered to perform so well as to warrant allocation.</p>

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
Himley	335b	The Limes, Plantation Lane	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land in this broad location (site is 'moderate') Higher landscape sensitivity than the majority of land in this broad location (site is 'moderate') Major negative impacts predicted against education criteria in the Sustainability Appraisal Highways authority raise initial concerns with access <p><u>Conclusion</u></p> <p>The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Himley	479a	Land off Brignorth Road (East)	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land in this broad location (site is 'moderate') Similar landscape sensitivity to the majority of land in this broad location (site is 'low-moderate') Major negative impacts predicted against education criteria in the Sustainability Appraisal Highways authority raise initial concerns with junction capacity and connectivity <p><u>Conclusion</u></p> <p>The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Himley	707	Land at Himley	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Higher Green Belt harm than the majority of land in this broad location (site is 'moderate-high') Higher landscape sensitivity than the majority of land in this broad location (site is 'moderate') Major negative impacts predicted against education criteria in the Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Highways authority raise initial concerns with junction capacity and connectivity <p><u>Conclusion</u></p> <p>The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Northern Edge of Black Country	102	Land at Garrick Works, Garrick Farm, Stafford Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Higher Green Belt harm than the majority of land in this broad location (site is 'very high') Higher landscape sensitivity than the majority of land in this broad location (site is 'moderate') Major negative impacts predicted against education in the Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Highways Authority indicate initial concerns over access Site does not present an opportunity for a mixed-use urban extension <p><u>Conclusion</u></p> <p>The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
Northern Edge of Black Country	160	Upper Sneyd Road/Brownshore Lane	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Lesser Green Belt harm than the majority of land in this broad location (site is 'moderate-high') Similar landscape sensitivity to the majority of land in this broad location (site is 'low-moderate') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Major negative impacts predicted against education in the Sustainability Appraisal Site does not present an opportunity for a mixed use urban extension <p><u>Conclusion</u></p> <p>The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Northern Edge of Black Country	163	Land off Sneyd Lane	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Lesser Green Belt harm than the majority of land in this broad location (site is 'moderate-high') Similar landscape sensitivity to the majority of land in this broad location (site is 'low-moderate') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Major negative impacts predicted against education in the Sustainability Appraisal Site does not present an opportunity for a mixed-use urban extension <p><u>Conclusion</u></p> <p>The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Northern Edge of Black Country	163a	Land off Sneyd Lane	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Lesser Green Belt harm than the majority of land in this broad location (site is 'moderate-high') Similar landscape sensitivity to the majority of land in this broad location (site is 'low-moderate') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Major negative impacts predicted against education in the Sustainability Appraisal Site does not present an opportunity for a mixed-use urban extension <p><u>Conclusion</u></p> <p>The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Northern Edge of Black Country	163b	Land off Sneyd Lane	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Lesser Green Belt harm than the majority of land in this broad location (site is 'moderate-high') Similar landscape sensitivity to the majority of land in this broad location (site is 'low-moderate') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Site does not present an opportunity for a mixed-use urban extension <p><u>Conclusion</u></p> <p>The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
Northern Edge of Black Country	165	Bursnips Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Lesser Green Belt harm than the majority of land in this broad location (site is 'moderate-high') Similar landscape sensitivity to the majority of land in this broad location (site is 'low-moderate') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Major negative impacts predicted against education in the Sustainability Appraisal Would result in loss of cemetery use Site does not present an opportunity for a mixed-use urban extension <p><u>Conclusion</u></p> <p>The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Northern Edge of Black Country	166	Land at Holly Bank House, Bursnips Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Lesser Green Belt harm than the majority of land in this broad location (site is 'moderate-high') Similar landscape sensitivity to the majority of land in this broad location (site is 'low-moderate') Major negative impacts predicted against education in the Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Historic Environment Site Assessment indicates the potential for significant effects that may not be mitigated Site is partially brownfield land Site does not present an opportunity for a mixed-use urban extension <p><u>Conclusion</u></p> <p>The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Northern Edge of Black Country	204	land adjacent 46 Cannock Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Higher Green Belt harm than the majority of land in this broad location (site is 'very high') Higher landscape sensitivity than the majority of land in this broad location (site is 'moderate') Major negative impacts predicted against education in the Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Highways Authority indicate access may be unsuitable Site does not present an opportunity for a mixed-use urban extension <p><u>Conclusion</u></p> <p>The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Northern Edge of Black Country	206	land adj 116 Cannock Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land in this broad location (site is 'high') Higher landscape sensitivity than the majority of land in this broad location (site is 'moderate')

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<ul style="list-style-type: none"> Major negative impacts predicted against education in the Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. evidence base as set out in Duty to Co-operate correspondence. Highways Authority indicate access may be unsuitable Site does not present an opportunity for a mixed-use urban extension <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Northern Edge of Black Country	207	Land at Broad Lane Farm	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Lesser Green Belt harm to the majority of land in this broad location (site is 'moderate') Similar landscape sensitivity to the majority of land in this broad location (site is 'low-moderate') Major positive impacts predicted against education in the Sustainability Appraisal Highways Authority indicate access may be unsuitable Site does not present an opportunity for a mixed-use urban extension <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Northern Edge of Black Country	392	Land at Westcroft Farm	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land in this broad location (site is 'high') Lesser landscape sensitivity than the majority of land in this broad location (site is 'moderate') Major positive impacts predicted against education in the Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Highways Authority indicate access may be unsuitable Site does not present an opportunity for a mixed-use urban extension <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Northern Edge of Black Country	393	land rear 3-65 Upper Sneyd Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Lower Green Belt harm than the majority of land in this broad location (site is 'low') Similar landscape sensitivity than the majority of land in this broad location (site is 'low-moderate') Highways Authority indicate access may be unsuitable Site does not present an opportunity for a mixed-use urban extension <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
Northern Edge of Black Country	486 a&b	Land north of Blackhalve Lane, Wednesfield	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land in this broad location (site is 'high') Similar landscape sensitivity to the majority of land in this broad location (site is 'low-moderate') Major negative impacts predicted against education in the Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Highways Authority indicate access may be unsuitable Site does not present an opportunity for a mixed-use urban extension <p><u>Conclusion</u></p> <p>The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Northern Edge of Black Country	486c	Land off Linthouse Lane, Wednesfield	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land in this broad location (site is 'high') Similar landscape sensitivity to the majority of land in this broad location (site is 'low-moderate') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Site presents an opportunity for a mixed-use urban extension with on-site local facilities <p><u>Conclusion</u></p> <p>The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Northern Edge of Black Country	492 a, b & c	Land at Yieldfields Farm north of Bloxwich	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Higher Green Belt harm than the majority of land in this broad location (site is 'very high') Part of site is in higher landscape sensitivity to the majority of land in this broad location (site is 'moderate') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Site presents an opportunity for a mixed-use urban extension with on-site local facilities May require allocation of significant additional land in neighbouring local authority (Walsall) to be delivered <p><u>Conclusion</u></p> <p>The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Northern Edge of Black Country	520	Oakley Farm, Blackhalve Lane	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land in this broad location (site is 'high') Similar landscape sensitivity to the majority of land in this broad location (site is 'low-moderate') Major positive impacts predicted against education in the Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Site does not present an opportunity for a mixed-use urban extension

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<ul style="list-style-type: none"> May require allocation of additional land in neighbouring local authority (Wolverhampton) to be delivered <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Northern Edge of Black Country	537 & 537a	North Wolverhampton (Moseley)/ Land East of Bushbury	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Part of the site is in area of greater Green Belt harm than the majority of land in this broad location (site is 'very high') Higher landscape sensitivity than the majority of land in this broad location (site is 'moderate' and 'moderate-high') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal and of both very high Green Belt harm and moderate/high landscape sensitivity. Historic Environment Site Assessment indicates the potential for significant effects that may not be mitigated Site presents an opportunity for a mixed-use urban extension with on-site local facilities <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Northern Edge of Black Country	646 a&b	Land to the West of ROF Featherstone	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Part of site is higher Green Belt harm than the majority of land in this broad location (site is 'very high') Higher landscape sensitivity than the majority of land in this broad location (site is 'moderate') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Site presents an opportunity for a mixed-use employment-led development with on-site local facilities Opportunity for safeguarded land for potential future rail-based park and ride site <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Northern Edge of Black Country	666	Upper Pendeford Farm	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land in this broad location (site is 'high') Higher landscape sensitivity than the majority of land in this broad location (site is 'moderate') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Site does not present an opportunity for a mixed-use urban extension <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Northern Edge of Black Country	679	Kitchen Lane	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land in this broad location (site is 'high') • Similar landscape sensitivity to the majority of land in this broad location (site is 'low-moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. • Site layout, topography and vegetation may constrain potential to accommodate growth • Site does not present an opportunity for a mixed-use urban extension <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Western Edge of Black Country	236	Land adjacent Wergs Hall Road and Keepers Lane	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Green Belt land not adjacent to a Tier 1 Settlement • Lesser Green Belt harm than the majority of land in this broad location (site is 'moderate-high') • Higher landscape sensitivity than the majority of land in this broad location (site is 'moderate-high') • Major negative impacts predicted against education in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. • Highways authority raise initial concerns with surrounding junction capacity and connectivity issues <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Western Edge of Black Country	243	Land at Yew Tree Lane/Wrottesley Road West	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Green Belt land not adjacent to a Tier 1 Settlement • Lesser Green Belt harm than the majority of land in this broad location (site is 'moderate-high') • Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. • Site is separated from the adjacent highway by dense mature trees that are subject to tree preservation orders <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Western Edge of Black Country	245	Wightwick Hall Special School, Tinacre Hill, Wightwick	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Green Belt land not adjacent to a Tier 1 Settlement • Lesser Green Belt harm than the majority of land in this broad location (site is 'low') • Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate') • Major negative impacts predicted against education criteria in the Sustainability Appraisal • Site is largely brownfield land <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Western Edge of Black Country	260	Land off Bridgnorth Road, Wightwick	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Green Belt land not adjacent to a Tier 1 Settlement

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land in this broad location (site is 'high') • Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. • Site is separated from the adjacent highway by dense tree belt which is subject to tree preservation orders <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Western Edge of Black Country	339	Meadow Brook Stables, Gospel End Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Green Belt land not adjacent to a Tier 1 Settlement • Higher Green Belt harm than the majority of land in this broad location (site is 'very high') • Higher landscape sensitivity to the majority of land in this broad location (site is 'moderate-high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. • Major positive impacts predicted against education in the Sustainability Appraisal <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Western Edge of Black Country	350c	Land East of Radford Land (b)	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Green Belt land not adjacent to a Tier 1 Settlement • Similar Green Belt harm to the majority of land in this broad location (site is 'high') • Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. • Highways authority raise initial concerns with impacts on junctions in surrounding area <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Western Edge of Black Country	350d	Land west of Radford Lane	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Green Belt land not adjacent to a Tier 1 Settlement • Similar Green Belt harm to the majority of land in this broad location (site is 'high') • Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate') • Major negative impacts predicted against education criteria in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. • Highways authority raise initial concerns with impacts on junctions in surrounding area <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Western Edge of Black Country	364	Land at New Wood, off Bridgnorth Road (Site 1)	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Green Belt land not adjacent to a Tier 1 Settlement • Higher Green Belt harm than the majority of land in this broad location (site is 'very high')

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<ul style="list-style-type: none"> Higher landscape sensitivity than the majority of land in this broad location (site is 'high') Major positive impacts predicted against education in the Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Highways authority raise initial concerns that access may not be achievable <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Western Edge of Black Country	365	Land north of Bridgnorth Rd (adj the Hawthorns)	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Higher Green Belt harm than the majority of land in this broad location (site is 'very high') Higher landscape sensitivity than the majority of land in this broad location (site is 'moderate-high') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Western Edge of Black Country	368	Land off Enville Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Higher Green Belt harm than the majority of land in this broad location (site is 'very high') Lower landscape sensitivity than the majority of land in this broad location (site is 'low-moderate') Major negative impacts predicted against education in the Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Highways authority raise initial concerns that access may not be achievable <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Western Edge of Black Country	370	Land off Enville Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land in this broad location (site is 'high') Lower landscape sensitivity than the majority of land in this broad location (site is 'low-moderate') Major negative impacts predicted against education in the Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Western Edge of Black Country	494a	Land at Springhill Lane parcel A	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land in this broad location (site is 'high') Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal.

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<ul style="list-style-type: none"> Highways authority raise initial concerns regarding site access and junctions in surrounding area <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Western Edge of Black Country	494b	Land at Springhill Lane parcel B	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land in this broad location (site is 'high') Majority of the site is in similar landscape sensitivity to the majority of land in this broad location ('moderate' sensitivity), with the remainder being 'low-moderate' sensitivity Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Highways authority raise initial concerns regarding site access and junctions in surrounding area <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Western Edge of Black Country	503	Land North Codsall Palmers Cross	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land in this broad location (site is 'high') Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate') Major negative effects are predicted against the landscape criteria, due to the site's Green Belt harm. Major positive impacts predicted against education in the Sustainability Appraisal Site would result in the coalescence of Wolverhampton urban area and Bilbrook/Codsall <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Western Edge of Black Country	504	Land off Yew Tree Lane	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Lower Green Belt harm than the majority of land in this broad location (site is 'moderate-high') Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Western Edge of Black Country	510	Land West of Codsall Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land in this broad location (site is 'high') Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Major positive impacts predicted against education in the Sustainability Appraisal <p><u>Conclusion</u></p>

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.
Western Edge of Black Country	512	Wergs Golf Club Keepers Lane	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land in this broad location (site is 'high') Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Major positive impacts predicted against education in the Sustainability Appraisal Highways authority raise initial concerns regarding site access <p><u>Conclusion</u></p> <p>The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Western Edge of Black Country	548	Land at Pennwood Farm	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Higher Green Belt harm than the majority of land in this broad location (site is 'very high') Higher landscape sensitivity than the majority of land in this broad location (site is 'moderate-high') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal and of both very high Green Belt harm and moderate/high landscape sensitivity. Highways authority raise initial concerns regarding site access <p><u>Conclusion</u></p> <p>The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Western Edge of Black Country	559	Land east of Stourbridge Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Higher Green Belt harm than the majority of land in this broad location (site is 'very high') Higher landscape sensitivity than the majority of land in this broad location (site is 'moderate-high') Major negative impacts predicted against education in the Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal and of both very high Green Belt harm and moderate/high landscape sensitivity. Highways authority raise initial concerns regarding site access <p><u>Conclusion</u></p> <p>The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Western Edge of Black Country	560	Land north of Sandyfields Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Lower Green Belt harm than the majority of land in this broad location (site is 'moderate-high') Higher landscape sensitivity than the majority of land in this broad location (site is 'moderate-high') Major positive impacts predicted against education in the Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal..

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Western Edge of Black Country	561	Land off Foxlands Avenue	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Higher Green Belt harm than the majority of land in this broad location (site is 'very high') Higher landscape sensitivity than the majority of land in this broad location (site is 'moderate-high') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal and of both very high Green Belt harm and moderate/high landscape sensitivity Highways authority raise initial concerns regarding site access <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Western Edge of Black Country	566	Land west of the Straits Part 2	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Lower Green Belt harm than the majority of land in this broad location (site is 'moderate-high') Higher landscape sensitivity than the majority of land in this broad location (site is 'moderate-high') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Western Edge of Black Country	567	Green Hill Farm, Sandyfields	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Higher Green Belt harm than the majority of land in this broad location (site is 'very high') Higher landscape sensitivity than the majority of land in this broad location (site is 'moderate-high') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal and of both very high Green Belt harm and moderate/high landscape sensitivity. <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Western Edge of Black Country	573	Land west Stourbridge Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Higher Green Belt harm than the majority of land in this broad location (site is 'very high') Higher landscape sensitivity than the majority of land in this broad location (site is 'moderate-high') Major negative impacts predicted against education in the Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal and of both very high Green Belt harm and moderate/high landscape sensitivity. Highways authority raise initial concerns regarding site access <p><u>Conclusion</u></p>

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.
Western Edge of Black Country	577	Land at Hinksford Lane, Mile Flat Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land in this broad location (site is 'high') Lower landscape sensitivity than the majority of land in this broad location (site is 'low-moderate') Major negative impacts predicted against education in the Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Historic Environment Site Assessment indicates the potential for significant effects that may not be mitigated <p><u>Conclusion</u></p> <p>The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Western Edge of Black Country	579	East Holding 107 Westcroft Farm	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land in this broad location (site is 'high') Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. Highways authority raise initial concerns regarding site connectivity <p><u>Conclusion</u></p> <p>The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Western Edge of Black Country	582	Land off Langley Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Majority of site area is of lesser Green Belt harm ('moderate-high') than the majority of other land in this broad location Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate') Major positive impacts predicted against education in the Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. <p><u>Conclusion</u></p> <p>The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Western Edge of Black Country	654	Lawnswood Parcel B	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Higher Green Belt harm than the majority of land in this broad location (site is 'very high') Higher landscape sensitivity than the majority of land in this broad location (site is 'high')

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<ul style="list-style-type: none"> Major negative impacts predicted against education in the Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal and of both very high Green Belt harm and moderate/high landscape sensitivity. Historic Environment Site Assessment indicates the potential for significant effects that may not be mitigated <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Western Edge of Black Country	655	Lawnswood Parcel C	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Higher Green Belt harm than the majority of land in this broad location (site is 'very high') Higher landscape sensitivity than the majority of land in this broad location (site is 'high') Major negative impacts predicted against education in the Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal and of both very high Green Belt harm and moderate/high landscape sensitivity. Highways authority raise initial concerns regarding impact on surrounding junctions <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Western Edge of Black Country	673	Land at Wollaston Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Lower Green Belt harm than the majority of land in this broad location (site is 'moderate-high') Higher landscape sensitivity than the majority of land in this broad location (site is 'moderate-high') Major positive impacts predicted against education in the Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Western Edge of Black Country	684	Land off Swindon Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land in this broad location (site is 'high') Lower landscape sensitivity than the majority of land in this broad location (site is 'low-moderate') Major negative impacts predicted against education in the Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. <p><u>Conclusion</u> The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
Western Edge of Black Country	710	Land rear of Pennwood Lane	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Higher Green Belt harm than the majority of land in this broad location (site is 'very high') Higher landscape sensitivity than the majority of land in this broad location (site is 'moderate-high') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal and of both very high Green Belt harm and moderate/high landscape sensitivity. Highways authority raise initial concerns regarding site access and connectivity <p><u>Conclusion</u></p> <p>The site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy.</p>
Cannock Edge	202	Land east of Wolverhampton Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement The majority of the site is on an area of higher Green Belt harm ('very high') than the majority of land in this broad location, with the remainder being of 'high' harm Lower landscape sensitivity than the majority of land in this broad location (site is 'low-moderate') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Within a brick clay mineral safeguarding area <p><u>Conclusion</u></p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well as to warrant a departure from the Council's preferred Spatial Housing Strategy.</p>
Cannock Edge	203	Land West of Woodhaven	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land in this broad location (site is 'high harm') Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate') Major negative impacts predicted against education in the Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Within a brick clay mineral safeguarding area <p><u>Conclusion</u></p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well as to warrant a departure from the Council's preferred Spatial Housing Strategy.</p>
Cannock Edge	474	Land at Longford House, A5 Cannock Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Higher Green Belt harm than the majority of land in this broad location (site is 'very high') Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. <p><u>Conclusion</u></p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well as to warrant a departure from the Council's preferred Spatial Housing Strategy.</p>

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
Cannock Edge	529	Land at Middle Hill Part 2	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land in this broad location (site is 'high') Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Initial concerns raised by Highways Authority due to remoteness from services and facilities Within a brick clay mineral safeguarding area <p><u>Conclusion</u></p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well as to warrant a departure from the Council's preferred Spatial Housing Strategy.</p>
Cannock Edge	624	Land north of Chase Gate Public House, Wolverhampton Road	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Lesser Green Belt harm than the majority of land in this broad location (site is 'moderate-high') Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate') Major negative impacts predicted against education in the Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. Initial concerns raised regarding site access by Highways Authority <p><u>Conclusion</u></p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well as to warrant a departure from the Council's preferred Spatial Housing Strategy.</p>
Cannock Edge	659	Land near Shoal Hill Tavern	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement Similar Green Belt harm to the majority of land in this broad location (site is 'high') Higher landscape sensitivity than the majority of land in this broad location (site is 'high') Major positive impacts predicted against education criteria in the Sustainability Appraisal Major negative impacts predicted against landscape criteria in the Sustainability Appraisal <p><u>Conclusion</u></p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well as to warrant a departure from the Council's preferred Spatial Housing Strategy.</p>
Cannock Edge	720	Roman Way Hotel, Watling Street	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> Green Belt land not adjacent to a Tier 1 Settlement The majority of the site is on an area of lower Green Belt harm ('low-moderate') than the majority of land in this broad location Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate') Major negative impacts predicted against the education criteria in the Sustainability Appraisal Site is previously developed land <p><u>Conclusion</u></p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well as to warrant a departure from the Council's preferred Spatial Housing Strategy.</p>

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
South of Stafford	036a	Land South of Stafford	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Similar landscape sensitivity to the majority of land in this broad location (site is 'high') • Major negative impacts predicted against education in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. • Highways authority raise initial concerns regarding capacity of highway network in surrounding area <p><u>Conclusion</u></p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well that it should be allocated.</p>
New Settlement	585	Land off Gailey Island	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Green Belt land not adjacent to a Tier 1 Settlement • Similar Green Belt harm to the majority of new settlement options in the A449/West Coast Mainline corridor (site is 'high harm') • Lower landscape sensitivity than the majority of land in the A449/West Coast Mainline corridor location (site is 'low-moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. • Highways authority raise initial concerns with impact on surrounding highways network and connectivity • The site is not directly adjacent an existing town or larger village and appears unlikely to provide significant facilities beyond local retail centres and primary/first education <p><u>Conclusion</u></p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well as to warrant a departure from the Council's preferred Spatial Housing Strategy.</p>
New Settlement	585a	Land off Gailey Island (parcel 2)	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Green Belt land not adjacent to a Tier 1 Settlement • Similar Green Belt harm to the majority of new settlement options in the A449/West Coast Mainline corridor (site is 'high harm') • Lower landscape sensitivity than the majority of land in the A449/West Coast Mainline corridor location (site is 'low-moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. • Highways authority raise initial concerns with impact on surrounding highways network and connectivity • The site is not directly adjacent an existing town or larger village and appears unlikely to provide significant facilities beyond local retail centres and primary/first education <p><u>Conclusion</u></p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well as to warrant a departure from the Council's preferred Spatial Housing Strategy.</p>
New Settlement	665	Deanery Estate	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • Green Belt land not adjacent to a Tier 1 Settlement • Similar Green Belt harm to the majority of new settlement options in the A449/West Coast Mainline corridor (site is 'high harm')

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<ul style="list-style-type: none"> • Lower landscape sensitivity than the majority of land in the A449/West Coast Mainline corridor location (site is 'low-moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal. • Highways authority raise initial concerns with impact on surrounding highways network and connectivity • The site does not have a demonstrable footway access into the adjacent larger village and appears unlikely to provide significant facilities beyond local retail centres and primary/first education <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well as to warrant a departure from the Council's preferred Spatial Housing Strategy.</p>
New Settlement	029	Land - Dunston Estate	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • On non-Green Belt land, unlike the majority of new settlement options in the A449/West Coast Mainline corridor • Of average landscape sensitivity compared to the majority of land in the A449/West Coast Mainline corridor location (site is 'moderate') • Highways authority raise initial concerns with site severance due to the lack of agreed access over the West Coast Mainline and potential difficulties of establishing the required multiple site accesses within the parcel • The site is not directly adjacent an existing town or larger village and appears unlikely to provide significant facilities beyond local retail centres and primary/first education <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well as to warrant a departure from the Council's preferred Spatial Housing Strategy.</p>

I.3 Selected Employment Sites

I.3.1.1 **Table I.3.1** lists the preferred employment-led sites set out in the Publication Version of the South Staffordshire LPR (2024), within Policy SA5. The outline reasons for selecting each of the sites, as set out in the table below, have been determined by SSDC.

I.3.1.2 It should be noted that Site E14 'Vernon Park' and Sites E20a and E20b 'Land at Hilton Cross' which were assessed in the Regulation 19 SA (2022) have since been built out, and so are no longer proposed to be allocated through the LPR and are no longer reasonable alternative sites. These three sites therefore do not feature in the below tables.

Table I.3.1: Outline reasons for selecting employment sites

Site Ref.	Site Address	Outline Reasons for Selection (provided by Council)
E18	ROF Featherstone	The site performs very well and is one the districts strategic employment sites and is not in the Green Belt or Open Countryside. The site also benefits from an outline consent (20/01131/OUT). The site was already factored into the supply/demand balance in the EDNA update 2024 and this assessment has confirmed that there are no showstopper precluding the site from development and as such the site is proposed for re-allocation.
E24	i54	The site performs very well and is one the districts strategic employment sites and is not in the Green Belt or Open Countryside. The site also benefits from a previous outline consent (05/01311/OUT). The site was already factored into the supply/demand balance in the EDNA update 2024 and this assessment has confirmed that there are no showstopper precluding the site from development and as such the site is proposed for re-allocation.
E30	Land south of J13, M6.	The site performs relatively well and has a clear advantage for distribution/logistics of being very close to the M6 (J13) and significantly is not in the Green Belt. Staffordshire County Council highways team have confirmed that the site is 'ok in principle subject to significant highways improvements'. The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire's local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI and any further allocations that add to the pipeline. This results in a potential significant contribution (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA. A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS). Despite the site being less than the optimum size for a strategic employment site, the site very well performs in all other respects, and crucially is not subject to Green Belt constraint. Balancing the above factors, the site is proposed for allocation.
E33	West Midlands Interchange	The principle of the development is already established through the DCO process and the site scores significantly better than most other site options through this assessment. Major negative effects are predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District, however the principle of substantial

Site Ref.	Site Address	Outline Reasons for Selection (provided by Council)
		development has already been established in this location. The site can clearly make a significant contribution towards any unmet needs of the wider FEMA and could do so in a more sustainable manner than alternative site options (due to the proposed rail link). Given that the site can be built in line with the DCO without amending Green Belt boundaries, it is proposed that the site is allocated but will remain washed over by Green Belt.
E44	i54 western extension (north)	The site performs very well and is one the districts strategic employment sites and is not in the Green Belt or Open Countryside. The site was already factored into the supply/demand balance in the EDNA update 2024 and this assessment has confirmed that there are no showstopper precluding the site from development and as such the site is proposed for re-allocation

I.4 Rejected Employment Sites

I.4.1.1 **Table I.4.1** lists all reasonable alternative sites that have been considered as part of the SA process for employment-led use but are not preferred sites. The table sets out the reasons why these sites were not taken forward, as decided by SSDC.

Table I.4.1: Reasons for rejecting reasonable alternative employment sites

Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
E04 (E04a and E04b)	Land around Dunston Business Village	<p>The site performs relatively well and has a clear advantage of being a logical extension to an existing non-strategic employment site and is not in the Green Belt.</p> <p>The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire’s local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. When also factoring in the proposed new allocation at M6, Junction 13, this results in a potential significant contribution of 112.2ha (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA.</p> <p>A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS). However, this site is not strategic in scale, instead with a focus on office use meeting local SME business needs.</p> <p>Balancing the above factors, the site is not proposed for allocation.</p>
E05	Acton Plaza, Acton Trussell	<p>The site performs relatively well and has a clear advantage of being close to Junction 13 of the M6 as well as an existing employment area, and the site is not in the Green Belt. However, the site had a previous consent for office use (18/00664/REM) that has not come forward so deliverability may be uncertain.</p> <p>The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire’s local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. When also factoring in the proposed new allocation at M6, Junction 13, this results in a potential significant contribution of 112.2ha (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA.</p> <p>A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS). However, this site is not strategic in scale.</p> <p>Balancing the above factors, the site is not proposed for allocation.</p>
E15a	Hobnock Road, Essington. (exc. 5.2ha already within supply due to a certificate of lawful use for B2 industrial use).	<p>The site performs relatively well compared to most other site options, and has a clear advantage of being of low landscape sensitivity (in part due to previous quarrying use) with part of the site acceptable in principle for B2 use due to Certificate of Lawfulness consent. However, major negative effects are predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District. The site’s location in a brick clay mineral safeguarding area is also a significant constraint.</p> <p>The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire’s local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing further when</p>

Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
		<p>factoring in available supply at WMI. When also factoring in the proposed new allocation at M6, Junction 13, this results in a potential significant contribution of 112.2ha (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA.</p> <p>A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS). However, the site is in the Green Belt and it is the Council's choice not to release further Green Belt for employment land at this current time given the substantial pipeline of strategic employment land in the district, including an opportunity to allocate a further strategic site on non-Green Belt land (M6, Junction 13).</p> <p>Balancing the above factors, the site is not proposed for allocation.</p>
E31	Land east of Paradise Lane, Slade Heath	<p>The site performs relatively well and has the advantage of being very well contained and close to other commercial activity. However, major negative effects are predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District.</p> <p>The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire's local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. When also factoring in the proposed new allocation at M6, Junction 13, this results in a potential significant contribution of 112.2ha (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA.</p> <p>A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS). However, the site is in the Green Belt and it is the Council's choice not to release further Green Belt for employment land at this current time given the substantial pipeline of strategic employment land in the district, including an opportunity to allocate a further strategic site on non-Green Belt land (M6, Junction 13). Furthermore, this site is not strategic in scale.</p> <p>Balancing the above factors, the site is not proposed for allocation.</p>
E32	Land east of Four Ashes (proposed extension).	<p>The site performs relatively well and has the advantage of potentially forming an extension to an existing strategic employment site. However, there are some initial concerns about the site's deliverability, particularly relating to rights of access through the adjacent VEOLIA facility. The site is also predicted to cause major negative effects in the Sustainability Appraisal, due to being in one of the more harmful Green Belt areas within the District.</p> <p>The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire's local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. When also factoring in the proposed new allocation at M6, Junction 13, this results in a potential significant contribution of 112.2ha (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA.</p> <p>A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS). However, the site is in the Green Belt and it is the Council's choice not to release further Green Belt for employment land at this current time given the substantial pipeline of strategic employment land in the district, including an opportunity to allocate a further strategic site on non-Green Belt land (M6, Junction 13).</p> <p>Balancing the above factors, the site is not proposed for allocation.</p>

Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
E37	Land between ROF Featherstone and A449.	<p>The site performs relatively well and has the advantage of potentially forming an extension to ROF Strategic Employment Site. However, major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the district. Furthermore, the site has predominantly been promoted for residential led mixed use development.</p> <p>The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire’s local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. When also factoring in the proposed new allocation at M6, Junction 13, this results in a potential significant contribution of 112.2ha (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA.</p> <p>A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS). However, the site is in the Green Belt and it is the Council’s choice not to release further Green Belt for employment land at this current time given the substantial pipeline of strategic employment land in the district, including an opportunity to allocate a further strategic site on non-Green Belt land (M6, Junction 13).</p> <p>Balancing the above factors, the site is not proposed for allocation.</p>
E38	Land south of Moseley Road.	<p>The site performs relatively well and has the advantage of being located close to Hilton Cross Strategic Employment Site. However, major negative effects are predicted in the Sustainability Appraisal due to the site being in one of the more harmful Green Belt areas within the District and some initial concerns have been expressed by Staffordshire County Council highways team regarding its potential impact on the A460.</p> <p>The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire’s local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. When also factoring in the proposed new allocation at M6, Junction 13, this results in a potential significant contribution of 112.2ha (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA.</p> <p>A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS). However, the site is in the Green Belt and it is the Council’s choice not to release further Green Belt for employment land at this current time given the substantial pipeline of strategic employment land in the district, including an opportunity to allocate a further strategic site on non-Green Belt land (M6, Junction 13).</p> <p>Balancing the above factors, the site is not proposed for allocation.</p>
E39	Land to the west of Hilton Cross	Site withdrawn by landowner.
E41	Land north of Bognop Road.	<p>The site performs relatively well and has the advantage of being a former quarry so from a landscape sensitivity perspective development the impact of developing the site would be limited. However, major negative effects are predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District, and there are concerns about the remediation costs of developing the former quarry, as well as initial highway concerns.</p> <p>The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire’s local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. When also factoring in the proposed new allocation at M6, Junction 13, this results in</p>

Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
		<p>a potential significant contribution of 112.2ha (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA.</p> <p>A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS). However, the site is in the Green Belt and it is the Council's choice not to release further Green Belt for employment land at this current time given the substantial pipeline of strategic employment land in the district, including an opportunity to allocate a further strategic site on non-Green Belt land (M6, Junction 13).</p> <p>Balancing the above factors, the site is not proposed for allocation.</p>
E42	Former Severn Trent works, Wedges Mills.	<p>The site was considered unsuitable in the EDNA2 and has a considerable number of significant constraints including concerns around flooding, highly distinctive habitat areas within the site, viability, access, and the fact it is in a brick clay mineral safeguarding area. Major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District.</p> <p>The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire's local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. When also factoring in the proposed new allocation at M6, Junction 13, this results in a potential significant contribution of 112.2ha (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA.</p> <p>A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS). However, the site is in the Green Belt and it is the Council's choice not to release further Green Belt for employment land at this current time given the substantial pipeline of strategic employment land in the district, including an opportunity to allocate a further strategic site on non-Green Belt land (M6, Junction 13). Furthermore, this site is not strategic in scale.</p> <p>Balancing the above factors, the site is not proposed for allocation.</p>
E43	Land at J11 M6, Hilton Park.	<p>The site performs relatively well and has a clear advantage for distribution/logistics of being close to the M6 (J11). However, major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the district. The County highways team have also expressed potential concerns about the impact of loading traffic back onto the A460, something the M54/M6 link road is designed to alleviate.</p> <p>The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire's local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. When also factoring in the proposed new allocation at M6, Junction 13, this results in a potential significant contribution of 112.2ha (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA.</p> <p>A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS). However, the site is in the Green Belt and it is the Council's choice not to release further Green Belt for employment land at this current time given the substantial pipeline of strategic employment land in the district, including an opportunity to allocate a further strategic site on non-Green Belt land (M6, Junction 13).</p> <p>Balancing the above factors, the site is not proposed for allocation.</p>

Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
E45	Land north of i54 / M54.	<p>The site performs relatively well and has a clear advantage of being very close to the existing i54 site. However, major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District.</p> <p>The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire’s local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. When also factoring in the proposed new allocation at M6, Junction 13, this results in a potential significant contribution of 112.2ha (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA.</p> <p>A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS). However, the site is in the Green Belt and it is the Council’s choice not to release further Green Belt for employment land at this current time given the substantial pipeline of strategic employment land in the district, including an opportunity to allocate a further strategic site on non-Green Belt land (M6, Junction 13).</p> <p>Balancing the above factors, the site is not proposed for allocation.</p>
E46	Aspley Farm, south of Four Ashes.	<p>The site performs poorly and was deemed unsuitable as part of the EDNA2 assessment due to being unattractive to the market due to significant access constraints. Major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District.</p> <p>The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire’s local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. When also factoring in the proposed new allocation at M6, Junction 13, this results in a potential significant contribution of 112.2ha (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA.</p> <p>A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS). However, the site is in the Green Belt and it is the Council’s choice not to release further Green Belt for employment land at this current time given the substantial pipeline of strategic employment land in the district, including an opportunity to allocate a further strategic site on non-Green Belt land (M6, Junction 13).</p> <p>Balancing the above factors, the site is not proposed for allocation.</p>
E47	Land at Middlehill Farm (Site A).	<p>The site performs relatively poorly and was deemed ‘other’ quality in the EDNA2 and has initial concerns from County highways on the cumulative effect of the development on the highway network. Major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District.</p> <p>The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire’s local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. When also factoring in the proposed new allocation at M6, Junction 13, this results in a potential significant contribution of 112.2ha (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA.</p> <p>A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS). However, the site is in the Green Belt and it is the Council’s choice not to release further Green Belt for employment land at this current time given the substantial pipeline of strategic</p>

Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
		<p>employment land in the district, including an opportunity to allocate a further strategic site on non-Green Belt land (M6, Junction 13).</p> <p>Balancing the above factors, the site is not proposed for allocation.</p>
E48	Land at Middlehill Farm (Site B).	<p>The site performs relatively poorly and was deemed 'other' quality in the EDNA2, has initial concerns from County highways on its cumulative effect on the highway network, and is in an area of brick clay safeguarding. Major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District.</p> <p>The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire's local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. When also factoring in the proposed new allocation at M6, Junction 13, this results in a potential significant contribution of 112.2ha (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA.</p> <p>A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS). However, the site is in the Green Belt and it is the Council's choice not to release further Green Belt for employment land at this current time given the substantial pipeline of strategic employment land in the district, including an opportunity to allocate a further strategic site on non-Green Belt land (M6, Junction 13). Furthermore, this site is not strategic in scale.</p> <p>Balancing the above factors, the site is not proposed for allocation.</p>
E49	Land at Middlehill Farm (Site C).	<p>The site performs relatively poorly with a number of key constraints including its location within a brick clay safeguarding area and initial concerns from County highways on its cumulative effect on the highway network. Major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District.</p> <p>The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire's local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. When also factoring in the proposed new allocation at M6, Junction 13, this results in a potential significant contribution of 112.2ha (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA.</p> <p>A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS). However, the site is in the Green Belt and it is the Council's choice not to release further Green Belt for employment land at this current time given the substantial pipeline of strategic employment land in the district, including an opportunity to allocate a further strategic site on non-Green Belt land (M6, Junction 13).</p> <p>Balancing the above factors, the site is not proposed for allocation.</p>
E50	Land at M6 Toll, Cheslyn Hay	<p>The site performs relatively poorly with a number of key constraints including its location within a brick clay safeguarding area and initial significant concerns from County highways relating to the lack of a suitable access.</p> <p>The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire's local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. When also factoring in the proposed new allocation at M6, Junction 13, this results in</p>

Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
		<p>a potential significant contribution of 112.2ha (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA.</p> <p>A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS). However, the site is in the Green Belt and it is the Council's choice not to release further Green Belt for employment land at this current time given the substantial pipeline of strategic employment land in the district, including an opportunity to allocate a further strategic site on non-Green Belt land (M6, Junction 13). Furthermore, this site is not strategic in scale.</p> <p>Balancing the above factors, the site is not proposed for allocation.</p>
E51a	Extension to Bericote, Four Ashes (Site A).	<p>The site performs relatively well and has a clear advantage of being a logical extension to an existing employment site, however it is entirely wooded and is an area of high habitat distinctiveness. Major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District. Despite this, its Green Belt function could potentially be weakened in the future by the presence of surrounding employment land as WMI is developed.</p> <p>The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire's local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. When also factoring in the proposed new allocation at M6, Junction 13, this results in a potential significant contribution of 112.2ha (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA.</p> <p>A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS). However, the site is in the Green Belt and it is the Council's choice not to release further Green Belt for employment land at this current time given the substantial pipeline of strategic employment land in the district, including an opportunity to allocate a further strategic site on non-Green Belt land (M6, Junction 13). Furthermore, this site is not strategic in scale.</p> <p>Balancing the above factors, the site is not proposed for allocation.</p>
E51b	Extension to Bericote, Four Ashes (Site B).	<p>The site performs relatively well and has a clear advantage of being a logical extension to an existing employment site. Major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District. Despite this, its Green Belt function could potentially be weakened in the future by the presence of surrounding employment land as WMI is developed.</p> <p>The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire's local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. When also factoring in the proposed new allocation at M6, Junction 13, this results in a potential significant contribution of 112.2ha (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA.</p> <p>A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS). However, the site is in the Green Belt and it is the Council's choice not to release further Green Belt for employment land at this current time given the substantial pipeline of strategic employment land in the district, including an opportunity to allocate a further strategic site on non-Green Belt land (M6, Junction 13). Furthermore, this site is not strategic in scale.</p> <p>Balancing the above factors, the site is not proposed for allocation.</p>

Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
E52	Land at Laney Green.	<p>The site performs relatively poorly and was deemed 'other' quality in the EDNA2, is sloped in topography, has initial concerns from County highways on the cumulative effect of the development on the highway network, and includes an area of mineral safeguarding for brick clay. Major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District.</p> <p>The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire's local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. When also factoring in the proposed new allocation at M6, Junction 13, this results in a potential significant contribution of 112.2ha (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA.</p> <p>A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS). However, the site is in the Green Belt and it is the Council's choice not to release further Green Belt for employment land at this current time given the substantial pipeline of strategic employment land in the district, including an opportunity to allocate a further strategic site on non-Green Belt land (M6, Junction 13).</p> <p>Balancing the above factors, the site is not proposed for allocation.</p>
E53	Upper Pendeford Farm.	<p>The site performs relatively poorly with the sites topography and highway concerns are considered key constraints. Major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District.</p> <p>The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire's local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. When also factoring in the proposed new allocation at M6, Junction 13, this results in a potential significant contribution of 112.2ha (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA.</p> <p>A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS). However, the site is in the Green Belt and it is the Council's choice not to release further Green Belt for employment land at this current time given the substantial pipeline of strategic employment land in the district, including an opportunity to allocate a further strategic site on non-Green Belt land (M6, Junction 13).</p> <p>Balancing the above factors, the site is not proposed for allocation.</p>
E54	Land east of Wolverhampton Road.	<p>The site performs relatively poorly and was deemed 'other' quality in the EDNA2, is sloped in topography, has initial concerns from County highways on the cumulative effect of the development on the highway network, and includes an area of mineral safeguarding for brick clay. Major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District.</p> <p>The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire's local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. When also factoring in the proposed new allocation at M6, Junction 13, this results in a potential significant contribution of 112.2ha (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA.</p>

Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
		<p>A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS). However, the site is in the Green Belt and it is the Council's choice not to release further Green Belt for employment land at this current time given the substantial pipeline of strategic employment land in the district, including an opportunity to allocate a further strategic site on non-Green Belt land (M6, Junction 13).</p> <p>Balancing the above factors, the site is not proposed for allocation.</p>
E55	Bridgnorth Road sewage works.	<p>The site was identified as unsuitable in the EDNA2 and performs poorly due to the considerable number of significant constraints including concerns around viability and site access. Major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District.</p> <p>The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire's local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. When also factoring in the proposed new allocation at M6, Junction 13, this results in a potential significant contribution of 112.2ha (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA.</p> <p>A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS) although this site is not within one of the broad locations identified in that study. Furthermore, the site is in the Green Belt and it is the Council's choice not to release further Green Belt for employment land at this current time given the substantial pipeline of strategic employment land in the district, including an opportunity to allocate a further strategic site on non-Green Belt land (M6, Junction 13). In addition, this site is not strategic in scale.</p> <p>Balancing the above factors, the site is not proposed for allocation.</p>
E56	Land at Wall Heath.	<p>The site performs relatively poorly with a number of key constraints including its potential impact on mature tree belt along the railway walk that cuts through the site, and its cumulative effect on the highway network. Major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District.</p> <p>The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire's local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. When also factoring in the proposed new allocation at M6, Junction 13, this results in a potential significant contribution of 112.2ha (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA.</p> <p>A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS) although this site is not within one of the broad locations identified in that study. Furthermore, the site is in the Green Belt and it is the Council's choice not to release further Green Belt for employment land at this current time given the substantial pipeline of strategic employment land in the district, including an opportunity to allocate a further strategic site on non-Green Belt land (M6, Junction 13).</p> <p>Balancing the above factors, the site is not proposed for allocation.</p>
E57	Land at Mount Pleasant, Dunston.	<p>The site performs relatively well and has a clear advantage of being close to Junction 13 of the M6 as well as an existing employment area, and the site is not in the Green Belt. However there are initial highways concerns relating to the potential site access.</p>

Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
		<p>The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire’s local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. When also factoring in the proposed new allocation at M6, Junction 13, this results in a potential significant contribution of 112.2ha (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA.</p> <p>A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS). However, this site is not strategic in scale.</p> <p>Balancing the above factors, the site is not proposed for allocation.</p>
E58 (E58a and E58b)	Land at Gailey Lea Farm	<p>Site performs relatively well from a market perspective, having a clear advantage for distribution/logistics of being close to the M6 (J12) and the West Midland Interchange proposal. However, some initial concerns have been expressed by Staffordshire County Council highways team regarding cumulative impacts on the surrounding network and sustainable travel access. Major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District.</p> <p>The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire’s local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. When also factoring in the proposed new allocation at M6, Junction 13, this results in a potential significant contribution of 112.2ha (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA.</p> <p>A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS). However, the site is in the Green Belt and it is the Council’s choice not to release further Green Belt for employment land at this current time given the substantial pipeline of strategic employment land in the district, including an opportunity to allocate a further strategic site on non-Green Belt land (M6, Junction 13).</p> <p>Balancing the above factors, the site is not proposed for allocation.</p>
E59	Land north of Cocksparrow Lane	<p>Site performs relatively poorly with a number of constraints identified including its proximity to a local wildlife site and an irregular shape. Some initial concerns have been expressed by Staffordshire County Council highways team with concerns that suitable access may not be achieved through the industrial estate to the south. Major negative effects are also predicted in the Sustainability Appraisal due to the site being in one of the more harmful Green Belt areas within the District.</p> <p>The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire’s local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. When also factoring in the proposed new allocation at M6, Junction 13, this results in a potential significant contribution of 112.2ha (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA.</p> <p>A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS). However, the site is in the Green Belt and it is the Council’s choice not to release further Green Belt for employment land at this current time given the substantial pipeline of strategic employment land in the district, including an opportunity to allocate a further strategic site on non-Green Belt land (M6, Junction 13). In addition, this site is not strategic in scale.</p>

Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
		Balancing the above factors, the site is not proposed for allocation.
E60 (E60a and E60b)	Land north of the A5, Gailey	<p>Site performs relatively well from a market perspective, having a clear advantage for distribution/logistics of being close to the M6 (J12) and the West Midland Interchange proposal. However, some initial concerns have been expressed by Staffordshire County Council highways team regarding if a suitable access is achievable and impact on the surrounding network. Major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District.</p> <p>The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire's local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. When also factoring in the proposed new allocation at M6, Junction 13, this results in a potential significant contribution of 112.2ha (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA.</p> <p>A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS). However, the site is in the Green Belt and it is the Council's choice not to release further Green Belt for employment land at this current time given the substantial pipeline of strategic employment land in the district, including an opportunity to allocate a further strategic site on non-Green Belt land (M6, Junction 13).</p> <p>Balancing the above factors, the site is not proposed for allocation.</p>
E61 (E61a and E61b)	Pendeford Hall Lane	<p>Site performs relatively poorly with a number of constraints including flood zone 2/3 running through the site. Some initial concerns have been expressed by Staffordshire County Council highways team with concerns around lack of bus, pedestrian and cycle connectivity and impact on surrounding junctions. Major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District.</p> <p>The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire's local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. When also factoring in the proposed new allocation at M6, Junction 13, this results in a potential significant contribution of 112.2ha (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA.</p> <p>A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS). However, the site is in the Green Belt and it is the Council's choice not to release further Green Belt for employment land at this current time given the substantial pipeline of strategic employment land in the district, including an opportunity to allocate a further strategic site on non-Green Belt land (M6, Junction 13).</p> <p>Balancing the above factors, the site is not proposed for allocation.</p>

I.5 Selected Gypsy and Traveller Sites

I.5.1.1 **Table I.5.1** lists the preferred sites for Gypsy and Traveller pitches set out in the Publication Version of the South Staffordshire LPR (2024), within Policy SA4. The outline reasons for selecting each of the sites, as set out in the table below, have been determined by SSDC.

Table I.5.1: *Outline reasons for selecting Gypsy and Traveller sites*

Site Ref.	Site Address	Outline Reasons for Selection (provided by Council)
GT01	New Acre Stables	Site assessed as suitable to meet the occupants 5 year requirement of 4 pitches through the Pitch Deliverability Study 2021.
GT06	The Spinney, Slade Heath	Site assessed as suitable to meet the occupants 5 year requirement of 2 pitches through the Pitch Deliverability Study 2021.
GT07	The Bungalow, Rockbank, Coven	Site assessed as suitable to contribute 3 additional pitches against the occupants 5 year requirement of 5 pitches, as confirmed through the Pitch Deliverability Study 2021.
GT08	Brinsford Bridge, Stafford Road, Coven Heath	Site assessed as suitable to meet the occupants 5 year requirement of 7 pitches through the Pitch Deliverability Study 2021.
GT14	Brickyard Cottage, Bursnips Road, Essington	Site assessed as suitable to meet the occupants 5 year requirement of 2 pitches identified through the Pitch Deliverability Study 2021.
GT17	The Stables, Old Landwyood Lane	Site assessed as suitable to meet the occupants 5 year requirement of 3 pitches through the Pitch Deliverability Study 2021.
GT18	Park Lodge, Poolhouse Road, Wombourne	Site assessed as suitable to meet the occupants 5 year requirement of 1 pitch through the Pitch Deliverability Study 2021.
GT23	Glenside, Dark Lane, Slade Heath	Site assessed as suitable to meet the occupants 5 year requirement of 1 pitch identified through the Pitch Deliverability Study 2021.
GT32	Kingswood Colliery, Watling Street, Great Wyrley, WS11 3JY	Site assessed as suitable to meet the occupants 5 year requirement of 8 pitches through the Pitch Deliverability Study 2021.

I.6 Rejected Gypsy and Traveller Sites

I.6.1.1 **Table I.6.1** lists all reasonable alternative sites that have been considered as part of the SA process for Gypsy and Traveller use but are not preferred sites. The table sets out the reasons why these sites were not taken forward, as decided by SSDC.

Table I.6.1: Reasons for rejecting reasonable alternative Gypsy and Traveller sites

Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
GT02	High House Poplar Lane, Hatherton	County Highways concerns over extending site.
GT03	New Stables, Poplar Lane, Hatherton	Detracts from the character and appearance of the landscape setting further heightened by its close proximity to Cannock Chase AONB and the linking footways and bridlepaths.
GT04	Pool House Barn, Slade Heath	Site is within Flood Zones 2 and 3.
GT05	Granary Cottage, Slade Heath	Site no longer occupied by travellers.
GT09	Oak Tree Caravan Park	Additional pitches likely to dominate nearest settlement (Brinsford).
GT10	St James Caravan Park, Featherstone	Additional pitches likely to dominate nearest settlement (Brinsford).
GT11	Fishponds Caravan Park, Featherstone	Additional pitches likely to dominate nearest settlement (Brinsford).
GT12	Malthouse Lane, Calf Heath	Unable to access essential services (water, electricity) and in Flood Zone 2 & 3.
GT13	Hospital Lane, Cheslyn Hay	Encroachment into the Green Belt through a site extension and loss of mineral safeguarding area for brick clay.
GT15	Walsall Road, Newtown	Site is already at full capacity.
GT16	Clee Park, Newtown	Site is already at full capacity.
GT19	1a Stafford Road, Coven Heath	No current need.
GT20	Land at Ball Lane	No current need.
GT24	59a Long Lane, Newtown, WS6 6AT	Issues with encroachment into Green Belt along Long Lane, site extension would cause encroachment, risk of dominating Newtown settlement due to its cumulative impact with other nearby gypsy and traveller sites.
GT27	Land off New Road adj Fishponds	Scoped out of Pitch Deliverability Study due to uncertain availability of land.
GT30	Rose Meadow, Prestwood	Site is within Flood Zones 2 and 3 and has significant highway concerns.
GT33	Fair Haven, Shaw Hall Lane, Coven Heath	No current need.
GT34	Anvil Park, Essington	No current need.

Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
GT35	Site to rear of 122 Streets Lane, Great Wyrley	Encroachment into the Green Belt and impact on its openness that landscaping would not obscure or minimise.
GT36	Squirrels Rest, Poplar Lane, Hatherton	Site is currently unauthorised and will result in encroachment into the Green Belt and will detract from the character and appearance of the landscape setting further heightened by its close proximity to Cannock Chase AONB and the linking footways and bridlepaths.
TSP01	Dobsons Yard (Intensification of existing site)	Future need can be met for 3 plots.
SSC1	Land east of Levedale Road	Landowner unwilling to make land available for a public gypsy and traveller site.
SSC2	Land west of Levedale	Landowner unwilling to make land available for a public gypsy and traveller site.
SSC3	Land at Water Eaton Lane	Landowner unwilling to make land available for a public gypsy and traveller site.
SSC4	Land North of Pinfold Lane / Whiston Road	Landowner unwilling to make land available for a public gypsy and traveller site.
SSC5	Land at Rodbaston	Landowner unwilling to make land available for a public gypsy and traveller site.
SSC6	Land south of Langley Road	Landowner unwilling to make land available for a public gypsy and traveller site.
SSC7	Land north of Springhill Lane	Landowner unwilling to make land available for a public gypsy and traveller site.
SSC8	Land off Dirtyfoot Lane	Landowner unwilling to make land available for a public gypsy and traveller site.
SSC9	Land north of Springhill Lane	Landowner unwilling to make land available for a public gypsy and traveller site.
SS10	Land between Springhill Lane and Dirtyfoot Lane	Landowner unwilling to make land available for a public gypsy and traveller site.

Appendix J: Policy Assessments

Appendix J: Policy Assessments

J.1	Introduction.....	J1
J.1.1	Overview.....	J1
J.1.2	Overview of policy assessments	J2
J.2	Development Strategy policies.....	J4
J.2.1	Policy DS1: Green Belt.....	J4
J.2.2	Policy DS2: Green Belt compensatory improvements.....	J7
J.2.3	Policy DS3: Open Countryside.....	J8
J.2.4	Policy DS4: Development needs	J11
J.2.5	Policy DS5: The Spatial Strategy to 2041	J13
J.3	Site allocation policies	J20
J.3.1	Policy MA1: Masterplanning strategic sites	J20
J.3.2	Policy SA1: Strategic development location: Land East of Bilbrook.....	J23
J.3.3	Policy SA2: Strategic development location: Land North of Penkridge	J28
J.3.4	Policy SA3: Housing allocations	J33
J.3.5	Policy SA4: Gypsy and Traveller allocations	J39
J.3.6	Policy SA5: Employment allocations.....	J46
J.4	Delivering the right homes	J53
J.4.1	HC1: Housing mix	J53
J.4.2	HC2: Housing density.....	J54
J.4.3	HC3: Affordable housing.....	J55
J.4.4	HC4: Homes for older people and others with special housing requirements	J57
J.4.5	HC5: Specialist housing	J58
J.4.6	HC6: Rural exception sites.....	J59
J.4.7	HC7: First homes exception sites.....	J60
J.4.8	HC8: Self-build and custom housebuilding.....	J62
J.4.9	HC9: Gypsy, Traveller and Travelling Showpeople.....	J63
J.5	Design and space standards	J65
J.5.1	HC10: Design requirements	J65
J.5.2	HC11: Protecting amenity.....	J67
J.5.3	HC12: Space about dwellings and internal space	J68
J.5.4	HC13: Parking provision	J69
J.6	Promoting successful and sustainable communities	J71
J.6.1	HC14: Health infrastructure	J71
J.6.2	HC15: Education.....	J72
J.6.3	HC16: South Staffordshire College (Rodbaston).....	J73
J.6.4	HC17: Open space	J73
J.6.5	HC18: Sports facilities and playing pitches	J75
J.6.6	HC19: Green infrastructure.....	J75

J.7	Building a strong local economy	J78
J.7.1	EC1: Sustainable economic growth.....	J78
J.7.2	EC2: Retention of employment sites	J80
J.7.3	EC3: Employment and skills	J81
J.7.4	EC4: Rural economy.....	J81
J.7.5	EC5: Tourist accommodation	J83
J.7.6	EC6: Rural workers dwellings.....	J85
J.7.7	EC7: Equine related development.....	J86
J.8	Community services, facilities and infrastructure	J88
J.8.1	EC8: Retail	J88
J.8.2	EC9: Protecting community services and facilities	J91
J.8.3	EC10: Wolverhampton Halfpenny Green Airport.....	J91
J.8.4	EC11: Infrastructure	J92
J.8.5	EC12: Sustainable transport.....	J93
J.8.6	EC13: Broadband.....	J95
J.9	Protecting and enhancing the natural environment.....	J96
J.9.1	NB1: Protecting, enhancing and expanding natural assets	J96
J.9.2	NB2: Biodiversity	J98
J.9.3	NB3: Cannock Chase SAC	J99
J.9.4	NB4: Landscape character	J100
J.10	Climate change and sustainable development	J102
J.10.1	NB5: Renewable and low carbon energy generation.....	J102
J.10.2	NB6A: Net zero new build residential development (operational energy).....	J103
J.10.3	NB6B: New build non-residential development (operational energy)	J105
J.10.4	NB6C: Embodied carbon and waste.....	J107
J.10.5	NB7: Managing flood risk, sustainable urban drainage systems & water quality	J108
J.11	Enhancing the historic environment	J112
J.11.1	NB8: Protection and enhancement of the historic environment and heritage assets	J112
J.11.2	NB9: Canal network	J113

J.1 Introduction

J.1.1 Overview

J.1.1.1 This appendix provides an assessment of 52 policies proposed by South Staffordshire District Council (SSDC) for the Local Plan Review (LPR) Publication Plan 2023-2041.

J.1.1.2 Each policy appraised in this report has been assessed for its likely impacts on each SA Objective of the SA Framework (see **Appendix B**) and are in accordance with the methodology as set out in the SA Main Report.

J.1.1.3 For ease of reference the scoring system is summarised in **Table J.1.1**.

Table J.1.1: Presenting likely impacts

Likely impact	Description	Impact symbol
Major Positive Impact	The proposed option contributes to the achievement of the SA Objective to a significant extent.	++
Minor Positive Impact	The proposed option contributes to the achievement of the SA Objective to some extent.	+
Negligible / Neutral Impact	The proposed option has no effect or a negligible effect on the achievement of the SA Objective.	0
Uncertain Impact	The proposed option has an uncertain relationship with the SA Objective or insufficient information is available for an appraisal to be made.	+/-
Minor Negative Impact	The proposed option prevents the achievement of the SA Objective to some extent.	-
Major Negative Impact	The proposed option prevents the achievement of the SA Objective to a significant extent.	--

J.1.1.4 Each appraisal in the following sections of this report includes an SA impact matrix that provides an indication of the nature and magnitude of effects. Assessment narratives follow the impact matrices for each policy, within which the findings of the appraisal and the rationale for the recorded impacts are described.

J.1.1.5 The sustainability performance of each policy is assessed in isolation from other policies in the LPR. Where negative effects are identified, there is the potential for other policies to mitigate these impacts. The main Regulation 19 SA report (**Volume 2**) considers the residual impacts of the Plan and the overall mitigating effects of the LPR policies.

J.1.1.6 The policies assessed within this appendix are based on the most up to date policy wording at the time of assessment, provided by SSDC in February 2024. The policy wording assessed in the SA is presented in a box alongside each of the assessment narratives within this document. It should be noted that there may be minor wording changes to the policies compared to that within the Publication Version of the LPR.

J.1.2 Overview of policy assessments

J.1.2.1 The impact matrices for all policy assessments are presented in **Table J.1.2**. These impacts should be read in conjunction with the assessment text narratives which follow in the subsequent sections of this appendix.

Table J.1.2: Summary of policy assessments

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

	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
EC5	0	0	0	+	0	0	0	+	+	+	0	+
EC6	0	0	0	+	0	0	+	0	0	0	0	+
EC7	0	0	0	0	0	0	0	+	0	0	0	+
EC8	+	0	0	0	0	0	0	0	0	+	0	+
EC9	+	0	0	0	0	0	0	+	0	+	0	+
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

J.2 Development Strategy policies

J.2.1 Policy DS1: Green Belt

Policy DS1: Green Belt

Within the West Midlands Green Belt, as defined on the policies map, opportunities to enhance the beneficial use of the Green Belt will be supported. This may include opportunities to provide access, for outdoor sport and recreation, to retain and enhance landscapes, visual amenity and biodiversity, or to improve damaged and derelict land.

Inappropriate development is, by definition, harmful to the Green Belt and will not be approved except in very special circumstances. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and other harm, is clearly outweighed by other considerations.

The construction of new buildings within the Green Belt should be regarded as inappropriate, unless it is for one of the exceptions listed within the National Planning Policy Framework. A separate Green Belt Supplementary Planning Document (SPD) will be prepared for further guidance.

Limited affordable housing for local community needs in the Green Belt will be supported on small rural exception sites where the development complies with Policy HC6.

The Green Belt boundary is altered through this Plan to accommodate development allocations set out in Policies SA1, SA2, SA3 and SA5. The boundaries of the reviewed Green Belt sites are identified in Appendices B-E of this document and on the policies map.

Development proposals should be consistent with other Local Plan policies.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Reference	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
DS1	0	0	-	-	0	-	+	+	0	+	+	+

J.2.1.1 The principal objectives of the Green Belt are to maintain openness and to restrict urban sprawl. The measures in place to protect the Green Belt are set out in the NPPF. Green Belt designation is not a reflection of the environmental quality or value of the land.

J.2.1.2 The NPPF sets out the five purposes of the Green Belt:

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

- J.2.1.3 80% of land within the Plan area lies within the West Midlands Green Belt. In line with the NPPF, a Green Belt review was carried out in 2019¹, recognising the likelihood that land would need to be released from the Green Belt and Open Countryside in some locations to meet future development needs. Green Belt is only released through the local plan process where it is considered necessary and justified.
- J.2.1.4 Where Green Belt release is considered necessary, the LPR should seek compensatory improvements to the environmental quality and accessibility within the remaining Green Belt, including improving access to the countryside and ecological and biodiversity enhancement, in line with the NPPF.
- J.2.1.5 Strategic Policy DS1 sets out protection for land in the revised Green Belt. By undertaking a Green Belt review and planning the release of Green Belt land only to facilitate planned growth, the policy has the potential to facilitate more sustainable communities, by locating new development in closer proximity to services, facilities and public transport. Transport by private car is identified as one of the key behaviours resulting in greater carbon emissions in the district². Reducing the need to travel and facilitating the use of public transport will potentially reduce carbon emissions in comparison to having unplanned growth or greater levels of dispersed development within the Green Belt; however, there is some uncertainty in this assessment as it relies on changes in behaviour in relation to travel patterns. The policy will also restrict further development in Green Belt designated areas, helping to protect soils and vegetation, which act as carbon stores. Overall, this policy will be likely to have a negligible effect on climate change mitigation (SA Objective 1).
- J.2.1.6 By focusing planned development within larger settlements and restricting the type and extent of other new development within the Green Belt, the policy will protect associated soils, vegetation, watercourses and flood zones on land protected by Green Belt designation. These features have roles in natural water management, carbon sequestration and may provide ecological habitats. One of the purposes of Green Belt designation is to encourage urban regeneration through the reuse of derelict and other urban land. There is potential for the policy to increase pressure for development in locations outside the Green Belt but within Flood Zones 2 and 3; however, this effect could be mitigated through the provisions of national and local planning policies and guidance. The policy is likely to have both minor positive and minor negative effects in relation to climate change adaptation, resulting in an overall negligible impact (SA Objective 2).
- J.2.1.7 The policy will protect existing soils and vegetation in Green Belt designated areas, which could provide habitats for various species. The policy will also require the release of some areas of Green Belt to deliver the relevant proposals set out in Policies SA1, SA2, SA3 and SA5. The policy supports proposals for beneficial uses of the Green Belt, including the enhancement of biodiversity, however, the nature and location of such proposals are unknown at this stage. Following the precautionary principle, the policy has the potential

¹ LUC (2019) 'South Staffordshire Green Belt Study', Available at <https://www.sstaffs.gov.uk/planning/spatial-housing-strategy-infrastructure-delivery.cfm> [Date accessed: 02/11/23]

² AECOM (2020) 'Climate Change Adaptation and Mitigation: Final Report October 2020' Available at <https://www.sstaffs.gov.uk/planning/local-plan-review-3.cfm> [Date accessed: 02/11/23].

to have minor negative impacts for biodiversity (SA Objective 3) at this stage, although longer term positive effects could be achieved.

- J.2.1.8 The policy will require the release of some areas of Green Belt to deliver the relevant proposals set out in Policies SA1, SA2, SA3 and SA5. The policy also supports “*opportunities to enhance the beneficial use of the Green Belt... This may include opportunities to provide access, for outdoor sport and recreation, to retain and enhance landscapes, visual amenity and biodiversity, or to improve damaged and derelict land*”. However, the nature and location of such proposals are not set out in this policy. Following the precautionary principle, a minor negative effect on landscape and townscape character cannot be ruled out at this stage (SA Objective 4).
- J.2.1.9 The Green Belt policy is likely to substantially restrict development in designated areas and therefore limit the potential effects of development on air and water quality. By planning for future residential development in more sustainable locations, residents will potentially have greater access to services and facilities and potentially greater access to public transport. Overall, a negligible impact on SA Objective 5 (Pollution and Waste) is identified.
- J.2.1.10 The policy sets out the need to revise Green Belt boundaries to deliver some of the predicted housing need. This is likely to result in the loss of previously undeveloped land and associated soils. There are extensive areas of ‘best and most versatile’ (BMV) agricultural land in South Staffordshire and it is likely that the development required to meet housing needs will result in some loss of this resource. By limiting development in the revised Green Belt, the policy will be likely to protect BMV agricultural land elsewhere, however, there is potential for a minor negative effect on natural resources (SA Objective 6) as a result of the loss of soils associated with delivering the required development.
- J.2.1.11 Policy DS1 sets out the need to revise the Green Belt to deliver predicted housing need and supports limited infilling within settlements in the Green Belt and affordable housing schemes for local community needs on rural exception sites. This will have a minor positive effect on housing provision (SA Objective 7).
- J.2.1.12 The policy supports proposals for the beneficial uses of the Green Belt, including for outdoor sport and recreation and for enhanced access to the Green Belt. The nature of any such proposals is uncertain at this stage, however, there is the potential for enhanced access to recreational facilities and open space, and a minor beneficial effect on health and wellbeing (SA Objective 8) and potentially SA Objective 12 (Economy and Employment), depending on the nature of any future facilities.
- J.2.1.13 By restricting the quantity and types of development within the Green Belt, the policy will be likely to preserve existing settings to historic assets on Green Belt designated land. The policy also sets out the need to release Green Belt land in order to deliver housing allocations. One of the purposes of the Green Belt is to “*preserve the setting and special character of historic towns*”. However, the Green Belt Study³ states “*this applies to very few places within the country and very few settlements in practice. In most towns, there*

³ LUC (2019) ‘South Staffordshire Green Belt Study’, Available at <https://www.sstaffs.gov.uk/planning/spatial-housing-strategy-infrastructure-delivery.cfm> [Date accessed: 02/11/23]

is already more recent development between the historic core and the countryside'. The summary table, provided on page 40 of the study, shows that all assessed land parcels were found to have a 'weak/no contribution' to this purpose. Overall, Policy DS1 will be likely to have a negligible effect in relation to cultural heritage (SA Objective 9).

- J.2.1.14 This policy, and separate Green Belt SPD, may direct planned future residential development to more sustainable locations where residents will have greater access to services and facilities and potentially greater access to public transport. As set out in the NPPF, there is also potential for Green Belt designation to result in pressure for greater levels of development outside the Green Belt and potentially away from existing settlements. This effect can be mitigated by planning for and allocating development sites in more sustainable locations. There is potential for a minor positive effect in relation to transport and accessibility (SA Objective 10).
- J.2.1.15 In relation to potential effects on access to education, by undertaking a planned review of the Green Belt and planning future residential development in more sustainable locations, new residents are likely to have better access to existing schools, which are often associated with existing settlements. Overall, the policy is likely to have a minor positive effect on access to education (Objective 11). Should any new school development be required, in addition to those locations for primary/first schools identified in this LPR, Green Belt designation may serve to restrict potential locations for that development.

J.2.2 Policy DS2: Green Belt compensatory improvements

Policy DS2: Green Belt compensatory improvements

Planning permission will not be granted for development of sites removed from the Green Belt through the Local Plan unless and until appropriate additional compensatory improvements to environmental quality and accessibility of remaining Green Belt are incorporated into a Section 106 agreement. As a starting point any compensatory improvements should be in addition to other local plan policy standards.

Where compensatory improvements have been identified in the Local Plan on remaining Green Belt land adjacent to an allocated site, such improvements must be secured through planning applications for these developments. Where areas of land for compensatory improvements have not been identified adjacent to a site through the Local Plan, applicants must demonstrate proportionate compensatory improvements to remaining Green Belt land in accordance with the following hierarchy:

- a) Compensatory improvements to remaining Green Belt land adjacent to, or in close proximity to the development site;
- b) Compensatory improvements to remaining Green Belt land within the wider locality accommodating the development;
- c) Compensatory improvements to remaining Green Belt land in an area identified through the Council's latest Nature Recovery Network mapping or Open Space Strategy.

In the event that it is robustly demonstrated that none of the above options can be satisfied (e.g. as land is demonstrably not available) then the Council will accept a commuted sum that it will use to undertake compensatory improvements.

Development proposals should be consistent with other Local Plan policies.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Reference	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
DS2	0	0	0	0	0	0	0	+	0	+	0	0

J.2.2.1 Strategic Policy DS2 outlines the requirement for “*compensatory improvements to remaining Green Belt land adjacent to, or in close proximity to the development site, the wider locality accommodating the development and Nature Recovery Networks and Open Space Strategy*”. This policy may have a minor positive effect on existing Green Belt land and provide opportunities to deliver or contribute towards the emerging Nature Recovery Networks and Open Space Strategies in South Staffordshire. These measures could potentially lead to minor positive impacts on accessibility to the countryside and opportunities for recreation (SA Objective 10 and 8).

J.2.2.2 There may also be potential for longer-term positive effects on biodiversity (SA Objective 3) if the delivery of Nature Recovery Networks incorporating measurable net gains in biodiversity is successful.

J.2.3 Policy DS3: Open Countryside

Policy DS3: Open Countryside

The district’s Open Countryside is defined as the area in the district which is both beyond the West Midlands Green Belt and outside of individual settlements’ development boundaries, as indicated on the Policies Map.

The Open Countryside contains many sensitive areas, including its landscapes and areas of ecological, historic, archaeological, economic, agricultural and recreational value. The council will protect the intrinsic character and beauty of the Open Countryside whilst supporting development proposals which:

- a) Assist in delivering diverse and sustainable farming enterprises;
- b) Deliver/assist in delivering other countryside-based enterprises and activities, including those which promote the recreation and enjoyment of the countryside, such as forestry, horticulture, fishing and equestrian activities;
- c) Provide for the sensitive use of renewable energy resources (in conjunction with Policy NB5); or
- d) Enable the re-use of an existing building, providing that the proposed use of any building (taking into account the size of any extensions, rebuilding or required alterations), would not harm the intrinsic character and beauty of the Open Countryside.

The policy provisions set out above indicate the types of development which will, in principle, be supported within the Open Countryside. In addition to the requirements set out in this policy, any proposed scheme must also be consistent with any relevant policies set out elsewhere within the Local Plan in order to be supported.

All types of development in the Open Countryside which are not explicitly supported by Policy DS3 will be considered on a case-by-case basis. Such proposals will only be permitted where they are not located on best and most versatile agricultural land and are fully consistent with any other relevant policies set out elsewhere in the Local Plan. These include, but are not limited to, policies which relate to the district’s:

- overall development strategy

Policy DS3: Open Countryside

- design standards
- landscape character and assets
- heritage assets
- ecological assets and biodiversity
- recreational assets
- housing mix requirements (where applicable)
- sustainable travel requirements

The Open Countryside boundary will be altered through this Plan to accommodate the relevant development allocations set out in Policies SA2, SA3 and SA5. The boundaries of the reviewed Open Countryside sites are identified in Appendices B, C and D of this document.

Development proposals should be consistent with other Local Plan policies.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Reference	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
DS3	0	0	0	+	0	+	+	+	0	0	+	+

J.2.3.1 Strategic Policy DS3 seeks to sensitively plan for development while protecting valuable features of the Open Countryside, including landscape character, biodiversity, heritage, agricultural soils and recreational value. Land designated as Open Countryside lies to the north of the district, outside the Green Belt and outside the settlement boundaries which will be redefined to accommodate the planned development as part of the LPR.

J.2.3.2 By allocating land to facilitate planned growth, and protecting areas of land outside these defined areas, the policy has the potential to facilitate more sustainable communities, by locating new development in closer proximity to services, facilities and public transport. Transport by private car is identified as one of the key behaviours resulting in greater carbon emissions in the district⁴. Reducing the need to travel and facilitating the use of public transport will potentially reduce carbon emissions in comparison to having unplanned growth or greater levels of development in the Open Countryside; however, there is some uncertainty in this assessment as it relies on changes in behaviour in relation to transport and travel. The policy will also restrict further development in areas of Open Countryside, helping to protect soils and vegetation, which act as carbon stores. Overall, a negligible effect on climate change mitigation is identified (SA Objective 1).

J.2.3.3 By restricting the type and extent of new development in the Open Countryside, the policy will help to conserve soils, vegetation, watercourses and flood zones on land protected by

⁴ AECOM (2020) 'Climate Change Adaptation and Mitigation: Final Report October 2020' Available at <https://www.sstaffs.gov.uk/planning/local-plan-review-3.cfm> [Date accessed: 02/11/23]

- the policy. These features have roles in natural water management. The policy will be likely to have a negligible effect in relation to climate change adaptation (SA Objective 2).
- J.2.3.4 The policy will protect existing soils and vegetation in the Open Countryside, which could provide habitats for various species. The circumstances in which development may be considered acceptable are set out in the policy. There is the potential for this development to have minor negative effects on some habitats and species. However, Policy DS3 also states that development will only be permitted when fully consistent with other Local Plan policies including ecological assets and biodiversity. Overall, the policy is likely to have a negligible impact on biodiversity (SA Objective 3) at this stage.
- J.2.3.5 The policy aims to “*protect the intrinsic character and beauty of the Open Countryside*”, whilst supporting development proposals as outlined within the policy text, and outlines that proposals must be fully consistent with other relevant policies within the Plan, such as those regarding the protection of landscape character and assets. The policy will help to largely protect the existing character of the landscape in these areas. There is likely to be a minor positive effect on the landscape (SA Objective 4).
- J.2.3.6 This policy may direct future residential development to more sustainable locations where residents will have greater access to services and facilities and potentially greater access to public transport, however, there is some uncertainty in the assessment of the nature of any behavioural change in relation to transport and travel and the associated effects on air quality and transport. There is the potential for negligible effects in relation to pollution (SA Objective 5) and transport (SA Objective 10).
- J.2.3.7 The policy seeks to direct development in the Open Countryside away from locations on BMV agricultural land, which is likely to protect such soils, leading to a minor beneficial effect on BMV agricultural land and natural resources (SA Objective 6).
- J.2.3.8 The policy seeks to protect the Open Countryside and supports applications for recreational facilities, provided the application meets other Local Plan policy requirements. Access to the open countryside and outdoor recreation are widely accepted as being beneficial to both mental and physical health. The policy could have a minor beneficial effect on health and wellbeing (SA Objective 8).
- J.2.3.9 By restricting the quantity and types of development in the Open Countryside, the policy will be likely to protect existing settings to historic assets. The policy will be likely to have a negligible effect in relation to cultural heritage (SA Objective 9).
- J.2.3.10 Policy DS3 supports limited new residential development including limited infilling within settlement boundaries, new or extended dwellings directly related to agriculture or forestry and affordable housing schemes for local community needs on rural exception sites. This will have a minor positive effect on housing provision (SA Objective 7).
- J.2.3.11 The policy seeks to limit the quantity and types of development in the Open Countryside and may serve to encourage housing development in more sustainable locations in proximity to existing schools. There is likely to be a minor positive effect on access to education (SA Objective 11).
- J.2.3.12 The policy supports some elements of rural enterprise such as, new dwellings directly related to agriculture or forestry, facilities for outdoor sport or recreation, nature

conservation, cemeteries as well as some aspects of change of use. There is the potential for the policy to have a minor beneficial effect on the economy and employment (SA Objective 12).

J.2.4 Policy DS4: Development needs

Policy DS4: Development needs

During the plan period up to 2041, the Council will promote the delivery of a minimum of:

- a) 4,726 homes over the period 2023-2041 to meet the districts housing target whilst providing approximately 10% additional homes to ensure plan flexibility. This housing target includes the district’s own housing requirement of 4,086 homes, plus a 640-home contribution towards unmet housing needs of the Greater Birmingham and Black Country Housing Market Area. The council will seek to demonstrate a 5 year housing land supply upon adoption of the plan.
- b) 107.45ha of employment land over the period 2023-2041 to ensure that South Staffordshire’s identified need for employment land of 62.4ha is met, as well as making available a contribution of 45.2ha to the unmet employment land needs of the Black Country authorities.

18.8ha of West Midlands Interchange will contribute towards South Staffordshire’s employment land supply and an additional minimum of 67ha towards the unmet employment land needs of the Black Country authorities, and which may increase depending on the employment land position of other local authorities in the site’s market area. 10ha at WMI will also contribute towards Cannock Chase council meeting their employment land needs. The remaining land supply on West Midlands Interchange (WMI) will be considered with related authorities through the Duty to Co-operate.
- c) 37 new Gypsy and Traveller pitches. This is the number of pitch options that have been assessed as deliverable against a larger need of 162 pitches, primarily to meet the future needs of existing families within the district. The Council has explored numerous options to meet this unmet need, including through ongoing Duty to Co-operate engagement with neighbouring authorities and promoters of residential site allocations, as well as assessing the suitability of publicly owned land. The Council will continue to work with Duty to Cooperate bodies to explore options for new or expanded public sites to meet this unmet need and will respond positively to windfall proposals that accord with Policy HC9.

Policies DS5, SA1, SA2, SA3, SA4 and SA5 set out how the above development needs will be delivered in a sustainable way that enhances the vitality of communities across South Staffordshire, supports economic growth, and which conserves and enhances the district’s environmental assets. Delivery of new development will be monitored in line with the monitoring framework and the development needs set out above will be kept under review to inform whether a review of the Local Plan is required.

	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
DS4	-	+/-	+/-	--	--	--	++	-	+/-	+/-	+/-	++

J.2.4.1 Strategic Policy DS4 sets out the overall development needs for South Staffordshire within the Plan period 2023-2041 to meet the identified needs for housing, employment land and Gypsy and Traveller pitches, relating to the LPR allocations as set out within Policies SA1-5 (see **Chapter J.3**).

- J.2.4.2 It should be noted that each site allocated within the LPR has been assessed as part of the reasonable alternative site assessments in the SA process, either in Appendix B of the Regulation 18 (III) SA Report⁵, Appendix F of the Regulation 19 SA Report⁶, or **Appendix G** of this report. The assessment of sites (and Policies SA1-5) has identified a range of sustainability impacts in regard to SA Objectives 2, 3, 9, 10 and 11, and therefore, for the purposes of this policy assessment the overall impact is uncertain.
- J.2.4.3 The development of 4,726 dwellings is expected to meet the identified local need and contribute towards the wider Housing Market Area (HMA) needs, and the proposed development of 37 Gypsy and Traveller pitches will contribute towards meeting identified needs. Overall, this policy is expected to have a major positive impact on housing provision (SA Objective 7). As the policy aims to meet the identified need for employment floorspace, this policy is also expected to have a major positive impact on economy and employment (SA Objective 12).
- J.2.4.4 The large scale of development proposed under this policy will be likely to result in the loss of previously undeveloped land. This would, in turn, result in the loss of ecologically, and potentially agriculturally, important soils. Therefore, a major negative impact on natural resources is anticipated (SA Objective 6).
- J.2.4.5 Based on an average of 2.3 people per dwelling in South Staffordshire⁷, the delivery of 4,726 dwellings could result in approximately 10,869 new residents. This increase in residents will be likely to increase pressures on existing infrastructure across the Plan area, including the road networks and local facilities and services. An increase in traffic and the number of vehicles on local roads will be expected to increase local air pollution. This, in turn, is likely to have a minor negative impact on the health and wellbeing of local residents (SA Objective 8).
- J.2.4.6 In 2021, South Staffordshire's carbon emissions totalled approximately 816,936 tonnes CO₂, whilst residents of the district had an average annual carbon footprint of 7.4 tonnes CO₂ per person⁸. Although there is a general trend of reduced carbon emissions over time, which will be likely to continue over the Plan period to 2041, the introduction of up to

⁵ Lepus Consulting (2021) Sustainability Appraisal of the South Staffordshire Local Plan Review: Preferred Options Plan – Regulation 18 (III) SA Report, August 2021. Available at:
<https://www.sstaffs.gov.uk/doc/182657/name/Sustainability%20Appraisal%20PO%202021.pdf/> [Date accessed: 02/11/23]

⁶ Lepus Consulting (2022) Sustainability Appraisal of the South Staffordshire Local Plan Review: Regulation 19 SA Report, October 2022. Available at: https://www.sstaffs.gov.uk/sites/default/files/2023-02/02_sa_volume_2_october_2022.pdf [Date accessed: 02/02/24]

⁷ Based on 2021 Census population data (110,500) and 2021 dwelling stock information (48,064).

ONS (2022) Population and household estimates, England and Wales: Census 2021. Available at:
<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/populationandhouseholdestimatesenglandandwales/census2021> and DLUHC & MHCLG (2022) Live tables on dwelling stock. Available at: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants> [Date accessed: 02/11/23]

⁸ DBEIS (2023) UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2021. Available at:
<https://www.gov.uk/government/statistics/uk-local-authority-and-regional-greenhouse-gas-emissions-national-statistics-2005-to-2021> [Date accessed: 19/02/24]

10,869 new residents could be expected to significantly increase the local area's contribution towards the causes of climate change in the short-medium term.

- J.2.4.7 It is also acknowledged that many of the allocations as set out in Policies SA1-5 and referred to in Policy DS4 are directed towards higher tier settlements and urban edges where it is likely that more sustainable communities can be created, owing to the existing provision of services, jobs and public transport infrastructure within these towns and settlements. Taking into consideration the large scale of growth, alongside the trend data and spatial strategy which seeks to promote more sustainable communities, a minor negative impact on climate change mitigation will be likely to result overall (SA Objective 1).
- J.2.4.8 In 2021-2022, South Staffordshire's total collected household waste totalled 44,355 tonnes⁹, which represents a decrease compared to the 2020-2021 dataset which identified 47,388 tonnes. The average waste production per person per year in England was 409kg in 2021. The introduction of 10,869 new residents could be expected to significantly increase the total household waste generation, with potential to result in a major negative impact on waste (SA Objective 5).

J.2.5 Policy DS5: The Spatial Strategy to 2041

Policy DS5: The Spatial Strategy to 2041

During the plan period to 2041, the council will deliver a minimum of 4,726 dwellings.

The aim will be to meet needs in a manner which builds on the district's existing infrastructure and environmental capacity, whilst recognising opportunities to deliver local infrastructure opportunities identified within the district. Throughout the district, growth will be located at the most accessible and sustainable locations in accordance with the settlement hierarchy set out below. The council will work with partners to deliver the infrastructure, facilities and services required to support this growth.

An integral part of the Strategy will be to ensure that growth is distributed to the district's most sustainable locations, avoiding a disproportionate level of growth in the district's less sustainable settlements whilst also recognising that very limited growth in less sustainable areas may be appropriate in limited circumstances set out in the settlement hierarchy below. It will also seek to maintain and enhance the natural and historic environment and the local distinctiveness of the district and retain and reinforce the current settlement pattern.

Tier 1 settlements

The district's Tier 1 settlements are Penkridge, Codsall/Bilbrook and Cheslyn Hay/Great Wyrley. These settlements hold a wider range of services and facilities and have access to key rail corridors into the adjacent towns and cities upon which the district relies for its higher order services and employment. The sustainable growth of these larger rural settlements will be delivered through appropriate allocations made in the Local Plan, consisting of sustainable and deliverable non-Green Belt land and suitable Green Belt site allocations.

These Tier 1 settlements will continue to support windfall housing growth, employment development and service provision, where it is consistent with other Local Plan policies. Proposals for retail and small-scale office development should be directed into the centres identified in Policy EC8, in a manner which reflects their role and function.

⁹ DEFRA (2023) Local authority collected waste: annual results tables 2021/22. Available at:

<https://www.gov.uk/government/statistical-data-sets/env18-local-authority-collected-waste-annual-results-tables-202122>

[Date accessed: 19/02/24]

Policy DS5: The Spatial Strategy to 2041

Tier 2 settlements

The district's Tier 2 settlements are Wombourne, Brewood, Kinver, Perton and Huntington. These settlements hold a wider range of services and facilities than other smaller settlements in the district's rural area. The sustainable growth of these larger rural settlements will be delivered through appropriate allocations made in the Local Plan, consisting of suitable and deliverable non-Green Belt site allocations.

These Tier 2 settlements will continue to support windfall housing growth, employment development and service provision, where it is consistent with other Local Plan policies. Proposals for retail and small-scale office development should be directed into the centres identified in Policy EC8, in a manner which reflects their role and function.

Tier 3 settlements

The district's Tier 3 settlements are Essington, Coven, Featherstone, Shareshill, Wheaton Aston, Pattingham and Swindon. These settlements hold a smaller range of services and facilities than Tier 1 and 2 settlements and as such are given a lesser level of growth. Limited growth in these smaller rural settlements will be delivered through appropriate allocations made in the Local Plan, consisting of suitable and deliverable non-Green Belt site allocations.

The district's Tier 3 settlements will continue to support limited windfall housing and employment growth to assist in meeting local needs, where it is consistent with other Local Plan policies. Employment development will be small in scale and aim to maintain the vitality and viability of these communities. Proposals for retail and small-scale office development should be directed into the centres identified in Policy EC8, in a manner which reflects their role and function.

Tier 4 settlements

The district's Tier 4 settlements are Bednall, Bishops Wood, Bobbington, Dunston, Himley, Seisdon and Trysull. These settlements will continue to support very limited windfall housing growth to assist in safeguarding the limited services and facilities in each village and to address local housing needs. Limited windfall housing growth will be supported only where it is consistent with other Local Plan policies.

Tier 5 settlements

The district's Tier 5 settlements are set out in the Rural Services and Facilities Audit 2021. These settlements are not intended to experience further housing or employment growth, owing to their poorer public transport links and lack of services and facilities relative to other settlements within the district. New development in these locations will be limited to the conversion and re-use of redundant rural buildings to appropriate uses, in accordance with other development plan policies. On a case-by-case basis, the very limited redevelopment of previously developed land for housing may also be supported within these settlements where this would not increase unsustainable transport movements from the settlement in question and would not conflict with other Local Plan policies. Limited affordable housing to meet specified local needs in accordance with relevant Local Plan policies may also be supported.

The district's wider rural area

In the rural area outside of the district's existing settlements, the objective of the Spatial Strategy is to protect the attractive rural character of the countryside. To deliver this, new development will be restricted to particular types of development to support biodiversity, carbon sequestration, renewable and low carbon technologies, tourism, sport and recreation and the local rural economy and rural diversification, where this is consistent with other Local Plan policies. Other than the forms of residential development identified as being acceptable in rural areas in the National Planning Policy Framework, isolated housing growth away from the district's rural settlements will not be supported.

Growth adjacent to the town of Stafford

Housing growth will be located at the strategic allocation made adjacent to Stafford through this Local Plan, in order to facilitate sustainable growth at a non-Green Belt location. This is:

- *Land at Weeping Cross, west of the A34*

Policy DS5: The Spatial Strategy to 2041

The district’s freestanding strategic employment sites

Outside of the district’s rural settlements, support will continue to be given for employment and economic development at the district’s six freestanding strategic employment sites (West Midlands Interchange, i54 South Staffordshire, Hilton Cross, ROF Featherstone/Brinsford, Four Ashes and M6 Junction 13). Existing and proposed employment sites throughout the district will be safeguarded for their respective uses, in accordance with other Local Plan policies.

Gypsy, Travellers and Travelling Showpeople sites

The district will seek to meet existing Gypsy, Travellers and Travelling Showpeople needs as far as possible, pursuing a strategy of meeting evidenced needs where they arise throughout the district. To deliver this strategy, allocations in the Local Plan will be used to allow for the sustainable intensification, extension and regularisation of suitable existing sites, in a manner consistent with other development plan policies and local evidence on pitch deliverability. Windfall proposals for additional pitches will be considered on a case-by-case basis against the criteria in Policy HC9 and other relevant Local Plan policies.

Delivering the Strategy

The Spatial Strategy will be delivered through allocations made in this Local Plan and associated planning policies, ensuring development is sustainable, enhances the environment and provides any necessary mitigating or compensatory measures to address harmful implications. In all cases development should not conflict with the policies of the development plan.

	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
DS5	-	-	-	--	-	--	++	-	-	-	-	++

J.2.5.1 Strategic Policy DS5 sets out the proposed distribution of housing, employment and Gypsy, Traveller and Travelling Showpeople development across the Plan area. A settlement hierarchy has been identified based on available services and facilities. In addition, development will also be directed towards the town of Stafford. The policy sets out the provision of homes sufficient to meet the district’s own needs and contribute to the identified unmet housing needs of the Greater Birmingham HMA.

J.2.5.2 The Spatial Strategy has been identified and refined by SSDC over a number of years. The Spatial Housing Strategy and Infrastructure Delivery (SHSID) document was consulted on in October 2019. This report described how proposed housing could be distributed between different settlements and other broad locations within the district, informed by strategic evidence on the sustainability and sensitivity of these different locations. Following consideration of the government’s changes to the planning system, further spatial options have been identified in the Spatial Housing Strategy Topic Paper (2024)¹⁰

¹⁰ South Staffordshire District Council (2024) The Local Plan Review: Spatial Housing Strategy Topic Paper.

and assessed through the SA process (see **Appendix F**). A preferred spatial housing strategy has been identified, called Option I.

- J.2.5.3 The Spatial Strategy seeks to direct development in the first instance towards the three Tier 1 settlements (Penkridge, Codsall/Bilbrook and Cheslyn Hay/Great Wyrley). Tier 2 and Tier 3 settlements will accommodate lower levels of housing allocations, with very low levels of housing development expected to be delivered in Tier 4 settlements and a small proportion of growth directed towards an urban extension to the south of Stafford.
- J.2.5.4 In 2021, South Staffordshire’s carbon emissions totalled approximately 816,936 tonnes CO₂, whilst residents of the district had an average annual carbon footprint of 7.4 tonnes CO₂ per person¹¹. The construction, occupation and operation of a minimum of 4,726 dwellings is expected to exacerbate air pollution, including greenhouse gas (GHG) emissions and particulate matter (PM). By directing a greater amount of development towards Tier 1 and Tier 2 settlements and the urban edge of existing larger towns outside the district, this policy will be likely to facilitate more sustainable communities, by locating residents in closer proximity to services, facilities and public transport, including railway stations. The use of the private cars and associated fossil fuel consumption is identified as one of the district’s largest contributors to carbon emissions¹². By seeking to reduce the need to travel and by locating development in settlements with existing public transport links, this policy could potentially lead to a lower level of carbon emissions than would otherwise be the case. On balance, considering the large scale of development against these factors, a minor negative effect is identified on climate change mitigation overall (SA Objective 1).
- J.2.5.5 By primarily directing development to existing urban areas, there may be more opportunities for the use of previously developed land. However, the development of this quantum of housing is likely to lead to the loss of previously undeveloped land to some extent and could potentially result in the exacerbation of flood risk from rivers and surface water. The proposed allocations will be considered as part of the Strategic Flood Risk Assessment (SFRA). SSDC has confirmed that, for allocated sites, development will be located in Flood Zone 1 only, and appropriate uses, as set out in Table 3 of the PPG¹³, are expected to be located in Flood Zones 2 and 3. Surface water management solutions will be likely to be required for all larger sites and this is likely to manage surface water runoff rates, in line with the requirements of the Environment Agency. However, at this stage of the planning process, and following the precautionary principle, this overall policy for the delivery of 4,726 homes has the potential to have a minor negative impact on flooding (SA Objective 2). The mitigating effects of the proposed policies on the identified impacts of the development of sites is considered in **Appendix H** of this report.

¹¹ DBEIS (2023) UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2021. Available at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-greenhouse-gas-emissions-national-statistics-2005-to-2021> [Date accessed: 19/02/24]

¹² AECOM (2020) ‘Climate Change Adaptation and Mitigation: Final Report October 2020’ Available at <https://www.sstaffs.gov.uk/planning/local-plan-review-3.cfm> [Date accessed: 02/11/23]

¹³ Flood Risk and Coastal Change PPG (2014) Available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/575184/Table_3_-_Flood_risk_vulnerability_and_flood_zone_compatibility_.pdf [Date accessed: 02/11/23]

- J.2.5.6 There are four Habitats sites within or in proximity to the district, designated as Special Areas of Conservation (SACs): Cannock Chase, Cannock Extension Canal, Motte Meadows and Fens Pools. Development locations towards the north east of the district in areas to the south of Stafford, in proximity to Penkridge and in Cheslyn Hay and Great Wyrley lie within the identified 15km Zone of Influence (ZoI) for Cannock Chase SAC. The ZoIs for other SACs are unknown at the time of assessment; likely significant effects on these SACs and other Habitats sites within the influence of the LPR are assessed within the emerging HRA to accompany this stage of the planning process. In relation to other potential impacts on biodiversity, the delivery of the Spatial Strategy on greenfield land as well as previously developed land could potentially lead to negative impacts on the local Green Infrastructure (GI) network and the loss of natural habitats and ecologically important soils. Despite biodiversity net gain provisions at the site level, overall, a potential minor negative cumulative impact on biodiversity cannot be ruled out (SA Objective 3).
- J.2.5.7 Directing a large proportion of allocations towards existing settlements will be likely to limit impacts on the character of the wider landscape and provides the opportunity for new buildings to be designed to be in-keeping with existing townscape character. However, development directed towards the edges of settlements and the wider countryside will be likely to result in the loss of areas of greenfield land and result in negative effects on landscape character. Development in locations to the north east of the district towards Cannock Chase AONB, such as in proximity to Dunston and Penkridge, have the potential to have a negative effect on the setting to the AONB. The Landscape Sensitivity Study identified some areas of South Staffordshire as 'moderate-high' or 'high' sensitivity to development, including around Bilbrook/Codsall, Penkridge, Brewood and Stafford. Building design and any mitigating landscape measures are unknown at this stage of the plan-making process, and therefore, a major negative impact on the landscape cannot be ruled out (SA Objective 4).
- J.2.5.8 An increased population in existing settlements will be likely to result in an increased number of vehicles and associated emissions. Air pollution in higher density urban areas is more likely to result in adverse impacts on human health than in lower density areas. This is because of higher pollution emissions in more populated streets, in-combination with more dense built form stagnating the air flow. The district contains one small Air Quality Management Area (AQMA) and lies adjacent to AQMAs covering the whole of the Black Country. The Spatial Strategy seeks to direct development towards settlements with existing services and access to public transport, and particularly access to rail services and in this regard will serve to reduce the level of likely effects in relation to vehicular emissions. Despite this, overall, a minor negative impact on pollution is identified (SA Objective 5).
- J.2.5.9 By directing development towards existing settlements, there is greater scope for development on brownfield sites, which will help to limit the permanent and irreversible loss of agriculturally and ecologically valuable soils. Allocations in proximity to Cheslyn Hay and Great Wyrley are likely to have a lesser effect on BMV soils due to the poorer quality of the agricultural land in this part of the district. However, the proposed new allocations on greenfield locations such as in proximity to Bilbrook and Codsall, Penkridge, Wombourne and Kinver, amongst others, will be likely to result in a significant loss of BMV soils. There is a level of uncertainty in this assessment as Provisional Agricultural Land Classification (ALC) does not distinguish between Grades 3a and 3b and therefore does

not distinguish between land classed as BMV and land which falls below this quality. Overall, a cumulative major negative impact on natural resources as a result of the loss of BMV soils cannot be ruled out at this stage (SA Objective 6).

- J.2.5.10 Policy DS5 aims to meet the identified housing and employment needs by 2041, delivering 107.45ha of employment land and a minimum of 4,086 dwellings in addition to a contribution of 640 dwellings towards meeting the Greater Birmingham HMA shortfall, and contribute towards meeting the Gypsy and Traveller needs. As a result, Policy DS5 is expected to have a major positive impact on housing and employment (SA Objectives 7 and 12).
- J.2.5.11 By directing development towards Tier 1 and Tier 2 settlements, this policy will be likely to locate new residents in areas with access to existing GP surgeries. Residents of South Staffordshire rely on hospital services in neighbouring authorities, including Stafford, Wolverhampton and Walsall. Settlements in proximity to the district boundaries in these locations are likely to have better access to hospital services, although the majority of settlements lie outside the 5km target distance used in this assessment. The Tier 1 settlements and Wombourne, in Tier 2, have leisure centres located within the settlement, providing access to related services. Penkridge, Cheslyn Hay and Great Wyrley lie within 200m of main roads or motorways. While no AQMAs have been identified in these settlements, it is possible some new residents will be located within areas with higher levels of vehicular emissions. There is a level of uncertainty in this assessment as the detailed locations for the development are not set out in this policy. It is likely that some development locations will lie outside the target distances for GP services and hospital services and therefore, overall, this policy could potentially have a minor negative impact on human health (SA Objective 8).
- J.2.5.12 The impacts of development on heritage assets and their settings are largely dependent on the distribution of development in relation to the location of SSDC's heritage assets and depend, in part, on the design and specific location of development which may allow for mitigation and/or enhancement. Providing growth in line with the identified settlement hierarchy will result in the larger settlements in the district accommodating the highest level of growth. The Tier 1 settlements of Penkridge and Codsall and Bilbrook and the Tier 2 settlements of Wombourne, Brewood and Kinver have a number of heritage assets associated with the settlements, including Listed Buildings and Conservation Areas. The proposed distribution of development under this policy could potentially result in a cumulative minor negative impact on cultural heritage (SA Objective 9).
- J.2.5.13 This policy seeks to locate development in more sustainable locations with access to existing services, including public transport options. The Tier 1 settlements benefit from having railway stations in central locations, as well as having local GP surgeries, primary and secondary schools and leisure centres within the settlements. Many Tier 2 settlements have GP surgeries as well as primary and secondary schools. Good access to local services and public transport options will help to reduce reliance on private car use. However, in a largely rural district with high levels of car ownership and usage, there is likely to be additional car users on roads due to the levels of development put forward in the strategy. The impact on local congestion as a result of the proposed development within this policy is likely to be greater in existing settlements, with larger numbers of new residents using

- the same roads and access points. Overall, this policy could potentially have a minor negative impact on transport and accessibility (SA Objective 10).
- J.2.5.14 By directing the majority of development towards existing Tier 1 and Tier 2 settlements as well as at the fringe of the Black Country conurbation, it is expected that a large proportion of new residents will be situated in close proximity to educational facilities. In addition, it is expected that there will be a good range of sustainable transport modes to assist travelling to these facilities. However, it is anticipated that some development locations will not be located within the target distances to schools and, overall, a minor negative impact on education is identified (SA Objective 11).
- J.2.5.15 Policy DS5 seeks to support the district's six existing strategic employment sites comprising: the West Midlands Interchange; i54 South Staffordshire; Hilton Cross; ROF Featherstone/Brinsford; Four Ashes; and M6, Junction 13. Existing and small-scale proposed employment sites throughout the district will be safeguarded.
- J.2.5.16 As stated in the Local Plan, a large proportion of South Staffordshire's population travel to work outside the district, with the Black Country and other authorities' economies an important source of employment. More recently, South Staffordshire has aspired to provide more local jobs, to reduce levels of out-commuting and provide employment for residents of neighbouring areas. The EDNA update (2024) identified a total objectively assessed gross employment land need of 62.4ha up to 2041.
- J.2.5.17 Public transport access to employment opportunities has been considered for each village settlement, using Hansen scores developed by Staffordshire County Council as part of the Rural Services and Facilities Audit. Hansen scores measure the number of destinations that can be accessed within a 60-minute journey time, factoring in the disbenefits of travel in terms of journey time, origin point population and the total number of jobs available at the destination. A higher Hansen score will show a greater level of access to employment opportunities by public transport for residents within a certain settlement. Hansen scores of 'good' or 'reasonable' are found in the settlements of Penkridge, Bilbrook, Codsall, Cheslyn Hay, Great Wyrley, Coven, Brinsford, Featherstone, Essington, parts of Huntington and parts of Perton.
- J.2.5.18 Policy DS5 seeks to safeguard sufficient employment land to meet the needs of the district and contribute to the unmet need in neighbouring authorities. The Tier 1 settlements identified in the Spatial Strategy have been identified as having 'reasonable' or 'good' access to employment opportunities by public transport. The Spatial Strategy is likely to have a major positive impact on local economy (SA Objective 12).

J.3 Site allocation policies

J.3.1 Policy MA1: Masterplanning strategic sites

Policy MA1 – Masterplanning Strategic Sites

The council considers high quality design to be a key component of achieving sustainable development and will support new development where it is well designed, located and responsive to local context.

A comprehensive and deliverable site-wide Strategic Master Plan (SMP) for the two strategic sites set out in Policies SA1 and SA2 will be prepared by the landowners/promoters, in collaboration with and to be approved by the council. This policy shall also apply to large scale or complex applications on sites not allocation in the plan.

To ensure sites are comprehensively planned and delivered, planning applications should be preceded by and consistent with a Strategic Master Plan which has been agreed in writing by the Council's Corporate Director of Place and Communities. Where applications have been submitted to the Council prior to the adoption of this Plan, a Strategic Master Plan should be agreed with the Council prior to or as part of the grant of planning permission.

The scope and contents of the site-wide Master Plans will be confirmed by the council in pre-application discussions and will be based upon and informed by community and stakeholder engagement (the exact nature will be agreed as part of pre-application discussions) and the relevant site-specific vision, objectives and concept plan as set out in Policies SA1 and SA2 to ensure that development for the whole site is delivered in a comprehensive and co-ordinated manner and is of sufficient quality. The site-wide Master Plans will be a material consideration in the determination of future planning applications related to the relevant site(s) and adherence to it/them will be secured through relevant planning conditions and/or legal agreement. The SMP will include the following:

- a) **Vision and Objectives** based on the content of the relevant strategic site policy as set out below, with any further iteration/update following further consultation and technical evidence
- b) **Baseline Evidence** setting out the key constraints and opportunities in relation to the site and reference to relevant supporting technical documentation.
- c) **Land Use Framework** addressing the key broad extent, type and mix of development uses across the site (including any public open space)
- d) **Movement Framework and Access Strategy** including:
 - a clear route hierarchy of primary and secondary streets, pedestrian and cycle routes which plug into existing and proposed networks and key destinations within and beyond the site boundary
 - potential bus circulation routes and bus stops (including service diversion where appropriate and infrastructure considerations for electric bus provision)
- e) **Green Infrastructure Framework** including:
 - A clear hierarchy of public open space throughout the site, including indicative roles and functions of different spaces (e.g. play, biodiversity/natural capital, SuDS, recreation)
 - Indicative ecological mitigation and opportunities for delivering biodiversity net gain on the site
 - Opportunities to integrate SuDS within the site's green infrastructure
 - Details of open space typologies in accordance with the most up-to-date evidence and standards and informed by engagement with the local community/Parish Council (including allotments/community gardens/forest schools etc., if required)
 - Utilisation and retention of existing landscape features and key views into and out of the site to create a distinctive and visually sensitive character to the development that links into the green infrastructure network beyond the site's boundaries
- f) **Urban Design Framework** creating a cohesive urban structure for the site including:

Policy MA1 – Masterplanning Strategic Sites

- Character areas
 - Gateways, landmarks, key views and nodes
 - Community hubs
 - Important frontages
 - Sensitive areas
- g) **Comprehensive Spatial Framework Plan** drawing together the above frameworks to demonstrate the overall placemaking strategy for the site
- h) **Development Phasing, Planning and Infrastructure and Delivery Strategy** collating information regarding the phasing and delivery of the following items:
- On and offsite highways mitigation
 - Public transport provision
 - Active travel links
 - On and offsite education provision
 - Open space, biodiversity / habitat mitigation and enhancement and other green infrastructure (e.g. playing fields/allotments)
 - Flood risk mitigation, drainage and SuDS infrastructure
 - Sports and recreation facilities
 - Community facilities
 - Utilities
 - Affordable housing provision
 - Healthcare (onsite or offsite)

In addition, this should set out the expectations for future planning applications and the broad timing and triggers for the delivery of critical infrastructure to deliver comprehensive and co-ordinated placemaking.

- i) **A strategy for site wide Design Coding:** setting out the approach to formulating provably popular site wide and area (as appropriate) design coding, in keeping with the requirements of the National Model Design Code and accompanying National Model Design Guidance.
- j) **Community and key stakeholder consultation/engagement strategy and outcomes for the site** setting out who has been engaged, in what way and how this has informed the SMP

Development proposals should be consistent with other Local Plan policies.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
MA1	+	+	+	+	+	+	+	++	+	+	+	0

J.3.1.1 Strategic Policy MA1 sets out key requirements for future Strategic Master Plans (SMPs) which will be prepared by the site promoters or landowners, to support the delivery of the two strategic site allocations within the South Staffordshire LPR (as set out in Policies SA1 and SA2). These SMPs should build upon the indicative concept plan, vision and key objectives that have been prepared for each site.

- J.3.1.2 The policy states that the SMP should provide a "*Movement Framework and Access Strategy*" to include public transport routes, pedestrian routes and cycle paths which will improve sustainable travel choices, enable local journeys to be made via active travel and contribute towards reduced reliance on private cars. These provisions may help to reduce GHG emissions. Furthermore, through ensuring comprehensive SMPs are produced, there will be opportunities to provide coordinated development and co-locating homes and facilities, resulting in more sustainable communities with less need to travel. A minor positive impact on transport and accessibility (SA Objective 10), air pollution (SA Objective 5) and climate change mitigation (SA Objective 1) could be achieved.
- J.3.1.3 Policy MA1 requires the provision of "*flood risk mitigation, drainage and SuDS infrastructure*", and encourages opportunities to be sought to integrate SuDS within the multi-functional GI networks within the developments. These measures will be likely to help mitigate surface water flooding and drainage issues. Furthermore, the proposed Green Infrastructure Framework will be likely to ensure a range of natural and semi-natural green spaces are provided, with likely benefits in terms of habitat provision and ecological corridors to enable movement of species through the development. These measures are expected to result in a minor positive impact on climate change adaptation (SA Objective 2) and natural resources (SA Objective 6) by conserving and enhancing ecosystem service functions of green and blue infrastructure.
- J.3.1.4 The policy requires "*indicative ecological mitigation and opportunities for delivering biodiversity net gain on the site*" and encourages developers to consider biodiversity and natural capital provision within open spaces, which will help to conserve and enhance the biodiversity value of the sites. As part of the multi-functional GI provisions, Policy MA1 encourages the creation of allotments and community gardens alongside new developments, which may help to provide additional habitats and wildlife corridors alongside the built developments, as well as benefits for mental and physical wellbeing of residents. A minor positive impact is identified in relation to biodiversity (SA Objective 3).
- J.3.1.5 Additionally, the provision of sports and recreational facilities and active travel links, within well-designed and attractive developments, will be likely to encourage new residents to lead more active lifestyles, with further benefits to human health. The policy will also ensure that healthcare facilities are provided to serve the new development. Overall, a major positive impact is identified in relation to health and wellbeing (SA Objective 8).
- J.3.1.6 The policy states that SMPs should ensure the "*utilisation and retention of existing landscape features and key views into and out of the site to create a distinctive and visually sensitive character to the development*" with connections to the wider multi-functional GI network beyond the site boundaries. Therefore, the policy will help to ensure that developments are carefully planned and designed to integrate with the surrounding landscape. These measures could potentially result in a minor positive effect on the local landscape and townscape character and help to create a sense of place and identity for the new communities (SA Objective 4).
- J.3.1.7 Furthermore, through seeking to protect key views, alongside the requirements to create a "*cohesive urban structure including ... gateways, landmarks ... [and] important frontages*" the policy may indirectly result in a minor positive impact on cultural heritage assets and historic landscapes (SA Objective 9).

- J.3.1.8 The policy seeks to deliver high quality and comprehensive developments, in line with the findings of baseline evidence and informed through community and stakeholder engagement, and as such, will help to identify and meet needs of the local population. The policy also aims ensure provision of affordable housing. A minor positive impact on housing provision could therefore be achieved (SA Objective 7).
- J.3.1.9 Through ensuring “*on and offsite education provision*”, the policy will be likely to result in a minor positive impact on the provision of schools to serve the new development (SA Objective 11). The policy could improve sustainability through seeking to prioritise on site provision, where feasible.
- J.3.1.10 The policy is not expected to directly affect the economy or employment (SA Objective 12).

J.3.2 Policy SA1: Strategic development location: Land East of Bilbrook

Policy SA1 – Strategic development location: Land East of Bilbrook

A strategic site for major housing growth is identified at Land East of Bilbrook, in the location shown in Appendix B of this document. The key spatial principles for delivering this level of housing growth at Land East of Bilbrook are illustrated through the indicative Concept Plan for the site shown in Appendix F. The development should be delivered in accordance with the requirements of other policies in this local plan and an approved site wide Strategic Master Plan as required under Policy MA1, informed by the Concept Plan, vision and objectives for the site contained within this document and requirements set out within the Infrastructure Delivery Plan. The site-specific requirements should include:

- a) A minimum of 750 new homes; including affordable housing and a specialist elderly housing element (e.g. sheltered or extra care) of at least 40 units in accordance with other policies within the local plan;
- b) A Community Hub focused around a central area of communal green space, well connected to the site wide green infrastructure network, to contain:
 - Small local convenience retail to serve the day to day needs of the neighbourhood
 - Flexible community space
 - A new First School (1.3ha)
- c) Vehicular accesses onto Pendeford Mill Lane, Lane Green Road and Barnhurst Lane and appropriate public transport provision to support sustainable travel from the scheme;
- d) High quality active travel links through and beyond the site, including to the recreational green space to the north, local shops and rail station in Bilbrook and the Sustrans network to the east;
- e) An integrated and connected network of accessible green and blue infrastructure informed by the indicative layout on the Concept Plan, in accordance with the most up-to-date evidence and standards and informed by engagement with the local community/Parish Council, providing for high quality Sustainable Drainage Systems, open space, play, biodiversity net gain and active travel, including a large central green space at the heart of the development and additional compensatory Green Belt improvements on the land identified as off -site green infrastructure to the south of the site in accordance with Policy DS2;
- f) Enhancement of and provision of additional playing pitches and associated facilities in the existing recreational open space to the north of Pendeford Mill Lane, including improved active travel links from the new neighbourhood;
- g) Any necessary historic environment mitigation for the site, as identified in the Council’s Historic Environment Site Assessment Stage 2 (2022), including setting back development from the site’s

Policy SA1 – Strategic development location: Land East of Bilbrook

eastern edge and reinforcing planting within that boundary and any mitigation required as a result of archaeological investigations;

- h) Necessary contributions towards offsite infrastructure, including highways and active travel mitigation measures, education, leisure and health provision;
- i) Development of the site should be in accordance with the recommendations set out in the Level 2 Strategic Flood Risk Assessment detailed site summary table and should provide a site-specific Flood Risk Assessment which shows development laid out as to avoid the floodplain and finished floor levels 600mm above the 1 in 100 plus climate change flood level; and
- j) Consideration of potential amenity issues and any mitigation requirements as a result of proximity to existing commercial units to the east of the site.

Development proposals should be consistent with other local plan policies.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Reference	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
SA1	-	0	0	--	-	-	++	-	0	-	++	+

J.3.2.1 This strategic development location has been assessed in Appendix B of the Regulation 18 (III) SA Report¹⁴. Land East of Bilbrook is Site 519 of Appendix B in the Bilbrook and Codsall cluster and is approximately 41ha.

J.3.2.2 The construction, occupation and operation of residential development is expected to exacerbate air pollution, including GHG emissions. However, Land East of Bilbrook is located with good access to a range of existing services including schools, GP surgeries, Codsall Leisure Centre and the railway station at Codsall. There is an existing Budgens and Coop within the settlement as well as a range of other local services including a bank. Policy SA1 requires a new First School and local convenience retail facilities as part of the future proposals for the site. By allocating this site in proximity to existing and proposed services and facilities, this policy will be likely to facilitate more sustainable communities, by reducing the need to travel and providing more sustainable travel choices. This policy could lead to a lower level of GHG emissions than a similar quantity of development in a less sustainable location; however, the development of a minimum of 750 dwellings will be expected to result in an increase in traffic in the local area and associated GHG emissions, to some extent. The policy is likely to have a minor negative effect on the climate change objective overall, although there is some uncertainty in the assessment (SA Objective 1).

¹⁴ Lepus Consulting (2021) Sustainability Appraisal of the South Staffordshire Local Plan Review: Preferred Options Plan – Regulation 18 (III) SA Report, August 2021. Available at: https://www.sstaffs.gov.uk/sites/default/files/2023-02/sustainability_appraisal_sa_sea_preferred_options_2021.pdf [Date accessed: 20/02/24]

- J.3.2.3 Policy SA1 proposes the development of a site of which a small proportion lies within Flood Zones 2 and 3, to the south of the site, and which also lies adjacent to the Shropshire Union Canal. The site coincides with areas determined to be at low, medium and high risk of surface water flooding. The site boundary sets out a site suggestion and SSDC confirm the developed area will lie outside Flood Zones 2 and 3, with 'water compatible uses', such as amenity open space, being located in areas of higher flood risk. It is likely that the future development of the site will require consideration of surface water management measures, as required by national planning policy and in accordance with other LPR policies, which should serve to mitigate effects on surface water runoff. The policy also states that development of a site should *"provide a site-specific Flood Risk Assessment which shows development laid out as to avoid the floodplain and finished floor levels 600mm above the 1 in 100 plus climate change flood level"*. Overall, there is likely to be a negligible effect on flood risk and surface water flood risk (SA Objective 2).
- J.3.2.4 The assessment of Site 519 (within the Regulation 18 (III) SA) found there was unlikely to be any significant effects on biodiversity and geodiversity, in terms of effects on designated sites and priority habitats. There is uncertainty in this assessment at this stage as no detailed ecological or protected species surveys have been carried out. The development of 41ha of greenfield agricultural land has the potential to result in the loss of grassland, hedgerows and trees, which may form habitats and corridors for various species. It is possible any adverse effects on biodiversity could be mitigated through appropriate measures. Policy SA1 seeks to ensure delivery of *"a network of accessible green and blue infrastructure"* including high quality on-site open space and biodiversity net gain as well as off-site compensatory improvements to the Green Belt to the south of the site. On balance, and subject to no significant effects being identified in the HRA, a negligible impact is identified, although there is potential for a minor positive effect on biodiversity in the longer term (SA Objective 3).
- J.3.2.5 The Landscape Sensitivity Study and Green Belt Study have assessed the land parcels in which the site lies. The site lies within an area assessed as being of 'moderate' landscape sensitivity. The Green Belt Study assessed the loss of land parcels in the site to have the potential to cause a 'high' level of harm to the purposes of the Green Belt.
- J.3.2.6 The site relating to Policy SA1 lies within the RCA 'Staffordshire Plain' and the LCT 'Ancient Clay Farmlands'. The characteristic landscape features of this LCT include *"mature hedgerow oaks and strong hedgerow patterns ... small broadleaved and conifer woodlands; well treed stream and canal corridors ... numerous farmsteads, cottages, villages and hamlets of traditional red brick; a gently rolling landform with stronger slopes in places; [and] dispersed settlement pattern"*. The development of this site could potentially be discordant with the key characteristics of the LCT. The site assessment (within the Regulation 18 (III) SA) identified the potential for views from the public rights of way (PRoW) network and local residents' homes to be affected by the development of the site. The site lies between Bilbrook and the existing urban edge of Wolverhampton. Development of the site will reduce the perceived gap between the settlements and there is a risk of future coalescence of the settlements.
- J.3.2.7 Overall, a major negative impact on the landscape objective is possible as a consequence of the 'high' level of harm to the purposes of the Green Belt as a result of the development of the site (SA Objective 4).

- J.3.2.8 A proportion of this site is located within 200m of the Wolverhampton AQMA. The proposed development of this site may locate some residents in areas of existing poor air quality. A railway line passes through the centre of Bilbrook and Codsall, linking Wolverhampton to Shrewsbury, adjacent to the proposed site. Development could potentially expose residents to higher levels of noise pollution and vibrations associated with this railway line. The proposed development could potentially increase the risk of groundwater contamination within an SPZ. The site lies adjacent to the Shropshire Union Canal and a proportion of the site is located within 200m of the River Penk. The proposed development could potentially increase the risk of contamination of these watercourses. Overall, a minor negative effect on pollution and waste will be likely (SA Objective 5).
- J.3.2.9 The site lies on Grade 2 ALC land, which represents some of South Staffordshire’s BMV agricultural land. The proposed development at this site will be likely to result in the loss of previously undeveloped land and the permanent and irreversible loss of soils. A minor negative impact on natural resources is identified (SA Objective 6).
- J.3.2.10 Policy SA1 indicates the site could deliver a minimum of 750 dwellings, including affordable housing and specialist elderly housing, providing a substantial contribution to the identified housing needs and therefore a major positive effect on housing need is expected (SA Objective 7).
- J.3.2.11 The closest NHS hospital with an A&E department is New Cross Hospital, located to the south east in Wolverhampton. The proposed development could potentially restrict the access of residents to essential health services provided by hospitals. The closest GP surgery is Bilbrook Medical Centre. The site lies partially within and partially outside the target distance of 800m to GP services. Codsall Leisure Centre is located within the target distance of 1.5km from the site, with a minor positive effect for future residents. A proportion of the site is located within 200m of the Wolverhampton AQMA. The proposed development could potentially expose residents to poor air quality associated with this AQMA, and therefore, have a negative impact on health. The site benefits from good access to the pedestrian and cycling network providing opportunities for active travel and recreation, including access to the towpath on the Shropshire Union Canal, which also forms part of the National Cycle Network. Policy SA1 also requires the proposals to provide high quality GI, recreational provisions and public open space “*including a large central green space at the heart of the development*”, which are expected to provide benefits to health and wellbeing.
- J.3.2.12 Overall, there are expected to be both minor positive and minor negative effects on health and wellbeing (SA Objective 8). Using the precautionary principle, a minor negative effect has been shown in the summary table above.
- J.3.2.13 Site 519 is located approximately 250m from the ‘Shropshire Union Canal Aqueduct’, a Grade II Listed Building, carrying the canal over River Penk. The site is located within an area of medium historic value in the Historic Environmental Character Assessment¹⁵. The impacts of development on heritage assets and their settings are largely dependent on

¹⁵ South Stafford Council (2011) ‘Historic Environmental Character Assessment: South Stafford’ Available at <https://www.staffordshire.gov.uk/environment/Environment-and-countryside/HistoricEnvironment/Historic-Environment-Assessments.aspx#southstaffs-hea> [Date accessed: 02/11/23]

the distribution of development in relation to the location of the heritage assets and the design of the development which may allow for mitigation and/or enhancement. Policy SA1 seeks to ensure the development is set back from the eastern edge and includes reinforced planting to screen the site, in line with the findings of the latest Historic Environment Site Assessment Stage 2. Subject to achieving suitable mitigation, a negligible impact could be expected on cultural heritage (SA Objective 9).

- J.3.2.14 The site has good access to Bilbrook Railway Station, being located approximately 600m from the site boundary. Train services to Wolverhampton and Shrewsbury are available from this station, with onward services to Birmingham. The site has good access to the footpath and PRow network, including the towpath along the Shropshire Union Canal, and is well connected to the existing road network. There are a range of services available in the settlements of Bilbrook and Codsall, including a convenience store located within 300m of the site. The site is located partially outside the target distance to a bus stop providing regular services. Overall, the site is assessed as having good access to a range of local services and sustainable transport choices. However, the District Integrated Transport Strategy for South Staffordshire¹⁶ states that there are long peak hour delays at junctions in Bilbrook, Codsall and Perton and there are car parking issues at local stations. Taking into account sustainable provisions within Policy SA1 including active travel links and public transport, there are a range of potential positive and negative effects on transport and access. Using the precautionary principle, a minor negative effect on transport and accessibility is recorded in the summary table above (SA Objective 10).
- J.3.2.15 Bilbrook and Codsall are served by several existing primary schools, including St Nicholas C of E First School, Lane Green First School, St Christopher's Catholic Primary School, Birches First School and Palmers Cross Primary School. Site 519 lies partially outside the target distance of 800m from a primary school; however, the policy seeks to provide a new on-site first school. Bilbrook and Codsall are served by Codsall Community High School and Aldersley High School. New residents will have good access to primary and secondary education; therefore, a major positive impact on education is identified (SA Objective 11).
- J.3.2.16 The site lies in proximity to a number of existing employment sites, including Balliol Business Park and GE Aviation. i54 lies approximately 1.1km to the east of the site and is accessible by walking and cycling routes. The Hansen score calculation did not assess the site, although the site lies in proximity to areas identified as having 'good' or 'reasonable' access to employment opportunities by public transport. Development of the site will offer a small range of employment opportunities at the proposed school and retail services. Overall, there is the potential for a minor positive effect on employment (SA Objective 12).

¹⁶ Staffordshire County Council (2017) South Staffordshire District Integrated Transport Strategy. Available at <https://www.staffordshire.gov.uk/Transport/Transport-Planning/District-integrated-transport-strategies.aspx#:~:text=What%20are%20district%20integrated%20transport,are%20called%20integrated%20transport%20strategies> [Date accessed: 20/02/24]

J.3.3 Policy SA2: Strategic development location: Land North of Penkridge

Policy SA2 – Strategic development location: Land North of Penkridge

A strategic site for major housing growth is identified at Land north of Penkridge in the location shown in Appendix B of this document. The key spatial principles for the delivering this level of housing growth at Land North of Penkridge are illustrated through the indicative Concept Plan for the site shown in Appendix F. The development should be delivered in accordance with the requirements of other policies in this local plan and an approved site wide Strategic Master Plan, as required under Policy MA1, informed by the Concept Plan, vision and objectives for the site contained within this document and the requirements of the Infrastructure Delivery Plan. The site-specific requirements should include:

- a) A minimum of 1,029 homes, including affordable housing and a specialist elderly housing element (e.g. sheltered or extra care) of at least 40 units in accordance with other policies within the local plan;
- b) A Community Hub focussed around community uses/provision with a strong relationship with primary movement through and within the site, well connected to the site wide green infrastructure network to contain:
 - A new first school (1.5ha)
 - Local convenience retail to serve the new neighbourhood
 - Other commercial floorspace to serve the day to day needs of the neighbourhood
 - Flexible community space
- c) A Community Park on the eastern side of the development.
- d) A transport strategy which includes consideration of accesses onto the A449, a gateway feature to the village on the site's northern edge and appropriate public transport provision to support sustainable travel from the scheme;
- e) The provision of full-size sports pitches to national standard along with associated facilities to meet identified need.
- f) High quality active travel links through and beyond the site, including a north-south cycle link through the development and into the existing village centre and rail facilities to the south;
- g) An integrated and connected network of accessible green and blue infrastructure informed by the indicative layout on the Concept Plan, in accordance with the most up-to-date evidence and standards and informed by engagement with the local community/Parish Council providing for high quality Sustainable Drainage Systems, open space, sport, biodiversity net gain and active travel, including an accessible central green space or spaces at the heart of the development and a riverside linear community park on the land identified to the east of the site;
- h) Any necessary historic environment mitigation for the site, as identified in the Council's Historic Environment Site Assessment Stage 2 (2022), including retention of tree and hedgerow boundaries bordering the site and any mitigation required as a result of archaeological investigations;
- i) Necessary contributions towards offsite infrastructure, including highways and active travel mitigation measures, education, leisure and health provision;
- j) Provide a site-specific Flood Risk Assessment which shows development laid out as to avoid the floodplain and finished floor levels 600mm above the 1 in 100 plus climate change flood level;
- k) Consideration of potential impacts on views from the Cannock Chase Area of Natural Beauty (AONB) and any necessary mitigation requirements; and,
- l) Consideration of potential amenity issues and any mitigation requirements as a result of proximity to the Anaerobic Digestion facility to the north of the site.

Development proposals should be consistent with other local plan policies.

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
SA2	-	0	0	--	-	-	++	-	0	+	++	+

J.3.3.1 This strategic development location has been assessed in Appendix B of the Regulation 18 (III) SA Report¹⁷. Land North of Penkridge comprises Sites 010, 420 and 584 in the Penkridge cluster. The total area of the three sites is approximately 83ha.

J.3.3.2 The construction, occupation and operation of residential development is expected to exacerbate air pollution, including GHG emissions. Penkridge has a range of existing services including primary and secondary schools, a GP surgery, Penkridge Leisure Centre and the railway station at Penkridge. There are local food stores in the village as well as a range of other local services including a Post Office. Policy SA2 requires a new first school, local convenience retail facilities and commercial floorspace as part of the future proposals for the site. By allocating these sites in proximity to existing and proposed services and facilities, this policy will be likely to facilitate more sustainable communities, by reducing the need to travel and providing more sustainable travel choices. There is a level of uncertainty in this assessment as the choice of whether to travel and the use of more sustainable modes of transport relies on behavioural change of individuals. Overall, the development of a minimum of 1,029 dwellings will be expected to result in an increase in traffic in the local area and associated GHG emissions, to some extent. The policy is likely to have a minor negative effect on the climate change objective overall (SA Objective 1), although there is some uncertainty in the assessment.

J.3.3.3 Policy SA2 proposes the development of a site of which a proportion lies within Flood Zones 2 and 3, to the south east of the site. The site also coincides with areas determined to be at low, medium and high risk of surface water flooding. The site boundary sets out a site suggestion and SSDC has confirmed that developed area will lie outside Flood Zones 2 and 3, with 'water compatible uses', such as amenity open space, being located in areas of higher flood risk. Policy SA2 requires an "integrated and connected network of accessible green and blue infrastructure ... providing for high quality Sustainable Drainage Systems", in accordance with national planning policy and other LPR policies, which should serve to mitigate effects on surface water runoff. The policy also states that development of a site should "provide a site-specific Flood Risk Assessment which shows development laid out as to avoid the floodplain and finished floor levels 600mm above the 1 in 100 plus climate change flood level". Overall, the policy is likely to have a negligible effect on flood risk (SA Objective 2).

¹⁷ Lepus Consulting (2021) Sustainability Appraisal of the South Staffordshire Local Plan Review: Preferred Options Plan – Regulation 18 (III) SA Report, August 2021. Available at: <https://www.sstaffs.gov.uk/local-plan-review-evidence-base>
 [Date accessed: 02/11/23]

- J.3.3.4 The site proposed within Policy SA2 lies less than 8km from Cannock Chase SAC, within the 15km ZoI; development proposals in this zone have the potential to have a negative effect on the integrity of the SAC through increased visitor numbers and vehicular emissions, unless mitigation is in place. The SAC Partnership have agreed a suite of measures with Natural England that allow for planned development within the ZoI to proceed without harm to the SAC. Financial contributions from developments are expected from the 0-8km Zone.
- J.3.3.5 Cannock Chase SAC is also designated as a SSSI. The allocated site appears to lie within the IRZs for this SSSI and for 'Belvide Reservoir' SSSI. The IRZ information states that "*any residential developments with a total net gain in residential units*" should be consulted on with Natural England. Furthermore, the development of 83ha of greenfield agricultural land has the potential to result in the loss of grassland, hedgerows, trees and riparian areas, which may form habitats for various species. It is possible any adverse effects on biodiversity could be mitigated through appropriate measures. Policy SA2 seeks high quality on-site open space and GI as well as a new community park, and deliver biodiversity net gain.
- J.3.3.6 On balance, and subject to no significant effects being identified in the HRA, a negligible impact is identified, although there is potential for a minor positive effect on biodiversity in the longer term (SA Objective 3).
- J.3.3.7 The site lies approximately 3.2km west of Cannock Chase AONB. There is the potential for the development of 83ha to be visible from the AONB and such development may be considered to affect the AONB's setting. Policy SA2 seeks to integrate the development into the landscape and provide a range of GI, and states that "*consideration of potential impacts on views from the Cannock Chase Area of Natural Beauty (AONB) and any necessary mitigation requirements*" is required.
- J.3.3.8 The Landscape Sensitivity Study has assessed the land parcels in which the site lies as being of 'moderate' and 'moderate-high' landscape sensitivity. The site does not lie within the Green Belt.
- J.3.3.9 The site relating to Policy SA2 lies within the RCA 'Staffordshire Plain' and the LCT 'Ancient Clay Farmlands'. The characteristic landscape features of this LCT include "*mature hedgerow oaks and strong hedgerow patterns ... small broadleaved and conifer woodlands; well treed stream and canal corridors ... numerous farmsteads, cottages, villages and hamlets of traditional red brick; a gently rolling landform with stronger slopes in places; [and] dispersed settlement pattern*". The development of this site could potentially be discordant with the key characteristics of this LCT. The site assessments (within the Regulation 18 (III) SA) identified the potential for views from PRow and local residents' homes to be affected by the development of the sites.
- J.3.3.10 Overall, a major negative impact on the character of the landscape is possible at this stage due to the effects of the development on a landscape assessed as being of 'moderate-high' sensitivity to change (SA Objective 4).
- J.3.3.11 A small proportion of the site was located within 200m of 'AQMA No.1 (Woodbank)' at the time of preparing the Regulation 18 (III) SA assessment; this AQMA has since been revoked. However, given the A449 passes through the site and the M6 lies to the east,

- with the eastern edge of the site lying within 200m of the M6, the proposed development could locate some new residents in areas of existing poor air quality. The proposed development could expose residents to higher levels of noise pollution and vibrations associated with the adjacent railway line along the western boundary (West Coast Mainline). The River Penk lies adjacent to the south eastern boundary of the site, and the proposed development could potentially increase the risk of contamination of this watercourse. Overall, a minor negative effect on pollution and waste will be likely (SA Objective 5).
- J.3.3.12 The majority of the site lies on Grade 2 and 3 ALC land, which could potentially represent some of South Staffordshire’s BMV agricultural land. A small area of the site, adjacent to the River Penk, lies on Grade 4 land. The proposed development will be likely to result in the loss of previously undeveloped land and the permanent and irreversible loss of soils. A minor negative impact on natural resources is identified (SA Objective 6).
- J.3.3.13 Policy SA2 indicates that the site could deliver a minimum of 1,029 dwellings, including affordable housing and specialist elderly housing, which will make a substantial contribution to identified housing needs and therefore a major positive effect on housing need is expected (SA Objective 7).
- J.3.3.14 The closest NHS hospital with an A&E department is County Hospital, Stafford, located approximately 8km to the north of the site. The proposed development could restrict the access of residents to essential health services provided by hospitals. The closest GP surgery is Penkridge Medical Practice, located approximately 700m from the closest parts of the site. The site lies partially within and partially outside the target distance of 800m to GP services. Penkridge Leisure Centre is located approximately 1.2km from the site, partially within the target distance of 1.5km. As described above, the proposed development could locate some new residents in areas of existing poor air quality associated with main roads, with adverse implications for human health.
- J.3.3.15 The site benefits from some access to the pedestrian network, including access to the towpath on the Staffordshire and Worcestershire Canal via an underpass to the M6. Policy SA2 also requires the proposals to provide high quality GI, open space and a new community park, active travel links and sports pitches, which will be expected to provide benefits to health and wellbeing and encourage active lifestyles.
- J.3.3.16 Overall, there are expected to be both minor positive and minor negative effects on health and wellbeing (SA Objective 8). Using the precautionary principle, a minor negative effect has been shown in the summary table above.
- J.3.3.17 The site allocated through Policy SA2 is located approximately 200m from the Grade II Listed Buildings ‘Garden Cottage, Mill End Cottage and The Cottage’ and approximately 250m from ‘Lower Drayton Cottages’ and ‘Lower Drayton Bridge’. The proposed development could have a minor negative impact on the setting of these Listed Buildings. The site also coincides with several archaeological features identified on the Historic Environmental Record including ‘Stone, Stafford and Penkridge Turnpike Road’, ‘Silver Mount Findspot, Penkridge’, ‘Coin Findspot, Penkridge’, ‘Water Meadow, Lower Drayton’, ‘Drayton Cross’ and ‘Pilgrim’s Ampulla, Penkridge’. The Historic Environmental Character

Assessment¹⁸ identified the site as being an area of medium historic value. The impacts of development on heritage assets and their settings are largely dependent on the distribution of development in relation to the location of the heritage assets and depend, in part, on the design of the development which may allow for mitigation and/or enhancement. Policy SA2 seeks to ensure the development preserves and enhances the trees and hedgerows to provide screening, and any mitigation required as a result of archaeological investigations, in line with the findings of the latest Historic Environment Site Assessment Stage 2. Subject to achieving suitable mitigation, a negligible impact could be expected on cultural heritage (SA Objective 9).

- J.3.3.18 Penkridge Railway Station is located approximately 880m from the site boundary, within the target distance of 2km for rail services. Train services are available to Birmingham and Stafford, as well as other stations on the West Coast Mainline. There are bus stops available on the A449 which passes through the site, providing services to Stafford and Wolverhampton with occasional services to other destinations. There are additional existing bus stops at Chase View and Goods Station Lane. Parts of the site are expected to have good access to existing bus services.
- J.3.3.19 The site has access to the footpath and PRow network and connects to the towpath along the Staffordshire and Worcestershire Canal. The site is well connected to the existing road network. There are a range of services available in Penkridge, including food stores and the leisure centre. Policy SA2 also sets out the requirement for a transport strategy to ensure public transport enhancements and *“high quality active travel links through and beyond the site, including a north-south cycle link through the development and into the existing village centre and rail facilities to the south”*. Overall, the site is assessed as having good access to a range of local services and sustainable transport choices. There is a level of uncertainty in the travel choices of future residents and effectiveness of the proposed transport strategy; however, overall, a minor positive impact could be achieved (SA Objective 10).
- J.3.3.20 Penkridge is served by three existing first schools and one middle school, while Wolgarston High School provides secondary education for the area. Policy SA2 proposes a new first school on the site. New residents will have good access to first school education and parts of the site have good access to middle and secondary school education. The policy seeks the creation of high quality active travel links through and beyond the site, and enhanced public transport provision, which could improve sustainable access to schools. A major positive impact on education is identified (SA Objective 11).
- J.3.3.21 There are some existing employment sites in the local area, including Dunston Business Park, which lies approximately 850m to the north of the site. The Hansen score calculation assessed central parts of the site as having ‘reasonable’ access to employment opportunities by public transport. Development of the site will offer a small range of employment opportunities at the proposed school, retail services and commercial

¹⁸ South Stafford Council (2011) ‘Historic Environmental Character Assessment: South Stafford’ Available at <https://www.staffordshire.gov.uk/environment/Environment-and-countryside/HistoricEnvironment/Historic-Environment-Assessments.aspx#southstaffs-hea> [Date accessed: 02/11/23]

floorspace to meet day to day needs. Overall, there is the potential for a minor positive effect on employment (SA Objective 12).

J.3.4 Policy SA3: Housing allocations

Policy SA3 – Housing allocations

Alongside the strategic development locations identified in Policies SA1 and SA2, the following housing allocations will be delivered to meet the district’s housing target up to 2041. The site boundaries are set out in the relevant site proforma in Appendix C.

Village/ Town	Site Ref No.	Use	Site location	Minimum Capacity (dwellings)	Proforma Page Number
Tier 1 Settlements					
Bilbrook	213	Residential	Bilbrook House	13	178
Codsall	419a&b	Residential	Land at Keepers Lane and Wergs Hall Rd	317	181
Codsall	224	Residential and station parking	Land adjacent to Station Road	85	179
Codsall	228	Residential	Former Adult Training Centre off Histsons Hill	29	180
Cheslyn Hay	523	Residential	Land east of Wolverhampton Road	49	184
Cheslyn Hay	119a	Residential	Land adjoining Saredon Road	60	183
Great Wyrley	141	Residential	154a Walsall Road	31	185
Great Wyrley	136	Residential, country park and allotments	Land at Landywood Lane	155	186
Great Wyrley	139	Residential	Pool View, Churchbridge	46	187
Great Wyrley	638	Residential	Loades Plc	29	191
Great Wyrley	704	Residential	Land off Norton Lane	31	188
Great Wyrley	536a	Residential (including specialist housing and school parking)	Land off Holly Lane	84	190
Great Wyrley	730	Residential	Fishers Farm	10	189

Policy SA3 – Housing allocations

Penkridge	005	Residential	Land at Cherrybrook	88	193
Penkridge	006	Residential	Land at Boscomoor Lane	80	194
Tier 2 Settlements					
Brewood	617	Residential	Four Ashes Road	63	197
Huntington	016	Residential	Land at Pear Tree Farm	39	199
Kinver	274	Residential	Land south of White Hill	120	201
Perton	239	Residential	Land west of Wrottesley Park Road (south)	150	204
Wombourne	416	Residential	Land off Orton Lane	57	206
Wombourne	285, 562/415, 459	Residential	Pool House Road	223	207-209
Tier 3 Settlements					
Coven	082	Residential	Land between A449 Stafford Rd & School Lane	48	212
Featherstone	397	Residential	Land adjacent to Brookhouse Lane	35	214
Pattingham	251	Residential	Hall End Farm	17	216
Swindon	313	Residential	Land off Himley Lane	10	218
Wheaton Aston	379	Residential	Land off Ivetsey Road	18	220
Other Sites Adjacent Neighbouring Towns and Cities					
South of Stafford	036c	Residential	Land at Weeping Cross (adjoining Stafford Borough)	81	222

All site allocations will be delivered in accordance with the individual site planning requirements set out in Appendix C and any other mitigation which is deemed necessary, through the development management process. Proposals should be consistent with other Development Management policies in the Local Plan.

	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
SA3	+/-	0	-	--	-	-	++	-	-	-	-	-

J.3.4.1 Strategic Policy SA3 sets out the proposed distribution of housing across the Plan area, in addition to the strategic sites identified in Policies SA1 and SA2. The distribution of allocations reflects the settlement hierarchy, which is based on available services and facilities as well as environmental constraints. In addition, a small proportion of development will be directed towards Stafford.

J.3.4.2 Each site proposed as a reasonable alternative has been separately assessed in Appendix B of the Regulation 18 (III) SA Report¹⁹, Appendix F of the Regulation 19 SA Report²⁰, or **Appendix G** of this report. Each site has a range of positive and negative effects on the SA Objectives. A summary of the assessment of all reasonable alternative sites is presented in **Appendix H**.

J.3.4.3 The Spatial Strategy seeks to direct development in the first instance towards the three Tier 1 settlements: Penkridge, Codsall/Bilbrook and Cheslyn Hay/Great Wyrley, as well as on land adjacent to the Black Country and Stafford. Tier 2 settlements comprise Wombourne, Brewood, Kinver, Perton and Huntington and Tier 3 settlements comprise Essington, Coven, Featherstone, Snareshill, Wheaton Aston, Pattingham and Swindon. Tier 2 and Tier 3 settlements will accommodate lower levels of housing growth.

Climate Change Mitigation

J.3.4.4 The construction, occupation and operation of development is expected to exacerbate air pollution, including GHG emissions and PM. However, by directing development towards Tier 1, Tier 2 and, to a lesser extent, Tier 3 settlements as well as towards the urban edge of Stafford, this policy will be likely to facilitate more sustainable communities, by locating residents in closer proximity to services, facilities and public transport, including railway stations. The use of the private cars and associated fossil fuel consumption is identified as one of the district’s larger contributors to GHG emissions. By seeking to reduce the need to travel and by locating development in settlements with existing public transport links, this policy could lead to a lower level of carbon emissions than would otherwise be the case. There is a level of uncertainty in this assessment as the choice of more sustainable modes of transport relies on behavioural change of individuals, which is uncertain at this stage. Policies SA1 and SA2 propose strategic housing allocations, while

¹⁹ Lepus Consulting (2021) Sustainability Appraisal of the South Staffordshire Local Plan Review: Preferred Options Plan – Regulation 18 (III) SA Report, August 2021. Available at: <https://www.sstaffs.gov.uk/local-plan-review-evidence-base> [Date accessed: 02/11/23]

²⁰ Lepus Consulting (2022) Sustainability Appraisal of the South Staffordshire Local Plan Review: Regulation 19 SA Report, October 2022. Available at: https://www.sstaffs.gov.uk/sites/default/files/2023-02/02_sa_volume_2_october_2022.pdf [Date accessed: 02/02/24]

Policy SA3 proposes the remaining housing allocations across the settlement hierarchy, with some allocations proposed in smaller settlements with fewer services and where new residents may be expected to have more reliance on private car usage, with associated GHG emissions. Overall, the potential impact of this policy on climate change mitigation is uncertain (SA Objective 1).

Climate Change Adaptation

- J.3.4.5 The South Staffordshire Plan area is crossed by numerous watercourses and associated floodplains, including the River Penk and the River Stour. The Shropshire Union Canal and Staffordshire and Worcestershire Canal also pass through the district. Development of previously undeveloped land could potentially result in the exacerbation of flood risk. One site identified in this policy (Site 617 in Brewood) includes land which lies in Flood Zones 2 and 3 and therefore of higher flood risk. Site-specific Flood Risk Assessments may lead to floodplain avoidance and surface water management solutions will be required for all larger sites, in line with the requirements of the Environment Agency. It is likely that fluvial and surface water flood risk impacts can be mitigated, as set out in the NPPF and required by the Environment Agency (and reflected in other LPR policies). It is likely the overall effect on SA Objective 2 will be negligible.

Biodiversity and Geodiversity

- J.3.4.6 There are four Habitats sites within or in proximity to the district, designated as SACs: Cannock Chase, Motte Meadows, Fens Pools and Cannock Extension Canal. Development locations towards the north east of the district in areas to the south of Stafford, in proximity to Penkridge, Cheslyn Hay, Great Wyrley, Brewood, Huntington, Featherstone, lie within the identified 15km ZoI for Cannock Chase SAC. The ZoIs for the three other Habitats sites are unknown at the time of assessment; likely significant effects on these SACs and other Habitats sites within the influence of the LPR will be assessed within the emerging HRA to accompany this stage of the planning process.
- J.3.4.7 Cannock Chase SAC has a 15km ZoI; development proposals in this zone, resulting in a net increase of more than one dwelling have the potential to have a negative effect on the integrity of the SAC through increased visitor numbers and vehicular emissions, unless mitigation is in place. The SAC Partnership have agreed a suite of measures with Natural England that allow for planned development within the ZoI to proceed without harm to the SAC. Financial contributions from developments are expected from the 0-8km Zone. Planned mitigation is therefore in place for those sites located in this zone.
- J.3.4.8 The delivery of residential development on greenfield land could potentially lead to negative impacts on the local GI network and the loss of natural habitats and ecologically important soils. Despite biodiversity net gain provisions at the site level, overall, a potential minor negative cumulative impact on biodiversity cannot be ruled out (SA Objective 3).

Landscape and Townscape

- J.3.4.9 Directing a large proportion of allocations towards existing settlements will serve to limit the likely effects on the character of the wider landscape and provides the opportunity for new buildings to be designed to be in-keeping with the existing townscape character. However, development of these sites will be likely to result in the loss of areas of greenfield land with potential to result in a minor negative effect on the landscape.

- J.3.4.10 The Landscape Sensitivity Study and Green Belt Study have assessed the land parcels in which these sites lie. Three sites allocated in Policy SA3 (Sites 224, 617 and 036c) lie in areas identified as being of 'moderate-high' or 'high' landscape sensitivity. While the majority of the site allocations do not lie within the existing Green Belt, three of the sites (Sites 224, 617 and 536a) lie in areas where the removal of those land parcels has the potential to cause a 'moderate-high', 'high' or 'very high' level of harm to the purposes of the Green Belt. Three further sites (251, 006 and 730) lie within areas where 'moderate' harm to the purposes of the Green Belt could occur.
- J.3.4.11 Development in locations to the north east of the district towards Cannock Chase AONB, such as in proximity to Huntington and Stafford, have the potential to have a negative effect on the setting to the AONB. Building design and any mitigating landscape measures are uncertain at this stage of the plan-making process.
- J.3.4.12 Overall, there is potential for a major negative effect on landscape, as a consequence of the release of land which will be likely to harm the purposes of the Green Belt in those locations (SA Objective 4).

Pollution and Waste

- J.3.4.13 An increased population in existing settlements will be likely to result in an increased number of vehicles and associated emissions. Air pollution in higher density urban areas is more likely to result in adverse impacts on human health than in lower density areas due to higher pollution emissions in more populated streets, in-combination with more dense built form stagnating the air flow. The overall strategy for the distribution of residential allocations seeks to direct development towards settlements with existing services and with access to public transport, and particularly access to rail services, and in this regard will help to reduce the level of likely effects in relation to vehicular emissions.
- J.3.4.14 SSDC benefits from relatively good air quality, having only one remaining AQMA. However, the district lies adjacent to the AQMAs covering the whole of the City of Wolverhampton, Dudley Metropolitan Borough and Walsall Metropolitan Borough. A small number of allocated sites in Great Wyrley and west of Wolverhampton are located in proximity to existing AQMAs. The district is crossed by a number of motorways, trunk roads and main roads, including the M6, A5, A449 and A34. Sites located in proximity to these routes may expose residents to higher levels of vehicular-related emissions. There are numerous groundwater Source Protection Zones and watercourses across the district. Sites located in proximity to these features may lead to a greater risk of pollution escape into watercourses or groundwater. Overall, a cumulative minor negative impact on pollution is identified (SA Objective 5).

Natural Resources

- J.3.4.15 By directing development towards existing settlements, there is some scope for development on brownfield sites, which will help limit the permanent and irreversible loss of agriculturally and ecologically valuable soils, such as in Cheslyn Hay and Featherstone. Allocations on greenfield land in proximity to Cheslyn Hay and Great Wyrley are likely to affect BMV soils to a lesser extent due to the quality of the agricultural land in much of this part of the district. However, the proposed allocations in locations in proximity to Billbrook and Codsall, Penkridge, Wombourne and Kinver, amongst others, will be likely to

result in a significant loss of soil of BMV soils due to the higher quality soils in proximity to these settlements. There is a level of uncertainty in this assessment as Provisional ALC does not distinguish between Grades 3a and 3b and therefore does not distinguish between land classed as BMV and land which falls below this quality. Overall, a minor negative impact on natural resources is identified (SA Objective 6).

Housing

- J.3.4.16 Policy SA3 seeks to make a substantial contribution to meeting the identified housing needs to the year 2041, resulting in a major positive impact on housing (SA Objective 7).

Health and Wellbeing

- J.3.4.17 By directing development towards Tier 1 and Tier 2 settlements, this policy will be likely to locate many new residents in areas with some access to existing GP surgeries. However, Pattingham, Huntington, Coven and Swindon do not contain GP surgeries and new residents will need to travel to neighbouring settlements to access health services. Residents of South Staffordshire rely on hospital services in neighbouring authorities, including Stafford, Wolverhampton and Walsall. Settlements in proximity to the district boundaries in these locations are likely to have better access to hospital services, including the proposed sites near Stafford and Featherstone. The majority of settlements lie outside the 5km target distance used in this assessment. The Tier 1 settlements, and Wombourne in Tier 2, have leisure centres located within the settlement, providing access to these services. Penkridge, Cheslyn Hay and Great Wyrley lie within 200m of main roads or motorways. While no AQMAs have been identified in these settlements, it is possible some new residents will be located within areas with higher levels of vehicular emissions. Overall, this policy is expected to have a range of positive and negative effects on human health (SA Objective 8). Using the precautionary principle, a minor negative effect has been shown in the summary table above.

Cultural Heritage

- J.3.4.18 The impacts of development on heritage assets and their settings are largely dependent on the distribution of development in relation to the location of SSDC's heritage assets and depend, in part, on the design and specific location of development which may allow for mitigation and/or enhancement. Some of the sites identified above located in Brewood, Pattingham, Wheaton Aston and Great Wyrley are located in proximity to Grade II Listed Buildings. Some of the identified sites in Codsall, Brewood, Kinver, Pattingham and Wombourne lie in proximity to the Conservation Areas associated with these settlements. The effects of proposed development of these sites on the significance of these heritage assets is uncertain at this stage. Specialist heritage advice will be required to establish the nature and extent of any such effects. There is the potential for a minor negative effect on cultural heritage assets (SA Objective 9).

Transport and Accessibility

- J.3.4.19 This policy seeks to locate development in more sustainable locations with access to existing services, including public transport options. The Tier 1 settlements benefit from having railway stations in central locations, as well as having local GP surgeries, primary and secondary schools and leisure centres within the settlements. Many Tier 2 settlements have GP surgeries as well as primary and secondary schools. Good access to local services

and public transport options will help to reduce the reliance on private car use. However, in a largely rural district with high levels of car ownership and high car usage, there is likely to be additional car users on roads as a result of the development put forward in the policy. The impact on local congestion as a result of the proposed development within this policy is likely to be greater in existing settlements, with larger numbers of new residents using the same roads and access points. Overall, this policy could potentially have a negative impact on transport and accessibility (SA Objective 10).

Education

- J.3.4.20 By directing the majority of development towards existing Tier 1 and Tier 2 settlements, it is expected that a large proportion of new residents will be situated in close proximity to educational facilities. Some sites in Bilbrook, Codsall, Brewood, Great Wyrley, Kinver, Perton, Wheaton Aston and Wombourne lie outside the target distances for primary education. Some sites in Billbrook, Brewood, Huntington, Perton, Swindon, Wheaton Aston, Great Wyrley, Coven and Featherstone lie outside of the target distances for secondary education. Overall, using the precautionary principle, there is likely to be a minor negative effect in relation to locating residents within the target distance to schools (SA Objective 11).

Economy and Employment

- J.3.4.21 As stated in the Local Plan, a large proportion of South Staffordshire's population travel to work outside the district, with the Black Country and other authorities' economies an important source of employment. More recently, South Staffordshire has aspired to provide more local jobs, to reduce levels of out commuting and provide employment for residents of neighbouring areas. Public transport access to employment opportunities has been considered for each village settlement, using Hansen scores developed by Staffordshire County Council. A higher Hansen score will show a greater level of access to employment opportunities by public transport for residents within a certain settlement. Hansen scores of 'good' or 'reasonable' are found in parts of the settlements of Penkridge, Bilbrook, Codsall, Cheslyn Hay, Great Wyrley, Coven, Brinsford, Featherstone, Essington, Huntington and Perton. Sites at Wombourne, Kinver, Pattingham, Stafford, Swindon and Wheaton Aston are identified as having less than 'reasonable' access to employment by public transport and it is more likely new residents will travel by car to access employment opportunities outside the local area. In this largely rural district, the majority of the sites proposed in Policy SA3 lie in areas with less than 'reasonable' level of access to employment by public transport. Overall, Policy SA3 is likely to have a minor negative impact on access to the local economy (SA Objective 12).

J.3.5 Policy SA4: Gypsy and Traveller allocations

Policy SA4 – Gypsy and Traveller allocations

Gypsy and Traveller pitches are allocated at the locations set out in the table below to meet identified family needs.

The new pitch allocations must be located within the red line boundary of the site as shown in Appendix D.

Policy SA4 – Gypsy and Traveller allocations

Site	Site ref no.	Total no. pitch allocations
New Acre Stables, Penkridge	GT01	4
The Spinney, Slade Heath	GT06	2
The Bungalow, Coven	GT07	3
Brinsford Bridge, Coven Heath	GT08	7
Brickyard Cottage, Essington	GT14	4
The Stables, Upper Landywood	GT17	3
Park Lodge, Wombourne	GT18	2
Glenside, Slade Heath	GT23	3
Kingswood Colliery, Great Wyrley	GT32	9

All sites are existing established sites or direct extension to these and are often in remote rural locations and washed over by the West Midlands Green Belt. As an exception to the planning policies relating to the location of Gypsy and Traveller pitch provision in the Green Belt, pitches identified in the Green Belt through the Local Plan will be acceptable in principle where planning applications are submitted for the specified number of additional pitches allocated in the Local Plan.

Planning applications on these sites will need to be in accordance with the criteria in Policy HC9, any site-specific planning requirements set out in Appendix D, and any other mitigation which is deemed necessary through the development management process.

Proposals should be consistent with other Development Management policies in the Local Plan.

	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
SA4	0	-	-	-	-	-	+	-	-	-	-	--

J.3.5.1 Accommodation needs for Gypsies and Travellers have been assessed in the Gypsy and Traveller Accommodation Assessment (GTAA) (2021)²¹ and considered further in the Pitch Deliverability Study (2021)²², as well as the Gypsy and Traveller Topic Paper (2022)²³ and

²¹ Opinion Research Services (2021) South Staffordshire Council Gypsy and Traveller Accommodation Assessment. Final Report, August 2021. Available at: https://www.sstaffs.gov.uk/sites/default/files/2023-02/gypsy_and_traveller_accommodation_assessment_2021.pdf [Date accessed: 01/02/24]

²² Opinion Research Services (2021) South Staffordshire Council Pitch Deliverability Assessment. Available at: https://www.sstaffs.gov.uk/sites/default/files/2023-02/pitch_deliverability_study_2021.pdf [Date accessed: 01/02/24]

²³ South Staffordshire District Council (2022). Gypsy and Traveller Topic Paper. November 2022. Available at: https://www.sstaffs.gov.uk/sites/default/files/2023-02/gt_topic_paper_final_nov_2022.pdf [Date accessed: 01/02/24]

emerging update to the GTAA (2024). These assessments found that there is the need to deliver 162 pitches to meet the needs of Gypsies and Travellers over the Plan period.

J.3.5.2 As set out in the table accompanying Policy SA4, 37 pitches for Gypsies and Travellers have been identified across nine sites. All proposed pitches will be delivered on existing sites or as extensions to existing sites. Beyond this, it is proposed that future need will be met through the DM process, using Policy HC9 as the criteria-based policy against which future applications will be considered.

J.3.5.3 Each site proposed as a reasonable alternative has been separately assessed in Appendix B of the Regulation 18 (III) SA Report²⁴ or Appendix F of the Regulation 19 SA Report (2022)²⁵. Each site has a range of positive and negative effects on the SA Objectives. A summary of the assessment of all reasonable alternative sites is presented in **Appendix H**.

Climate Change Mitigation

J.3.5.4 Due to the small-scale nature of the development within this policy, it is assumed that development proposals will have a negligible impact on the district's contributions to climate change (SA Objective 1).

Climate Change Adaptation

J.3.5.5 The majority of allocated Gypsy and Traveller sites are located wholly within Flood Zone 1 away from areas at risk of fluvial flooding, and in areas which are not identified as being at risk of surface water flooding.

J.3.5.6 However, one site (GT32) coincides with areas of Flood Zone 2 and 3, which could potentially expose site end users to higher risk of fluvial flooding. A proportion of Site GT08 coincides with areas determined to be at low, medium and high risk of surface water flooding, and a proportion of Site GT14 coincides with areas determined to be at low and medium risk of surface water flooding. The proposed development at these sites could potentially locate site end users in areas at risk of surface water flooding, as well as exacerbate surface water flood risk in surrounding locations to some degree.

J.3.5.7 Policy SA4 requires development to be in accordance with the requirements of Policy HC9, which would ensure that areas of high flood risk are avoided. However, there is potential for new Gypsy and Traveller development to be located in areas at some risk of flooding, or in areas that may be affected by flood risk in future; therefore, at this stage of the planning process and in line with the precautionary principle, a minor negative impact is identified (SA Objective 2).

²⁴ Lepus Consulting (2021) Sustainability Appraisal of the South Staffordshire Local Plan Review: Preferred Options Plan – Regulation 18 (III) SA Report, August 2021. Available at: <https://www.sstaffs.gov.uk/local-plan-review-evidence-base>
[Date accessed: 02/11/23]

²⁵ Lepus Consulting (2021) Sustainability Appraisal of the South Staffordshire Local Plan Review: Regulation 19 SA Report. October 2022. Available at: https://www.sstaffs.gov.uk/sites/default/files/2023-02/02_sa_volume_2_october_2022.pdf
[Date accessed: 01/02/24]

Biodiversity and Geodiversity

- J.3.5.8 Sites GT01, GT06, GT07, GT08, GT14, GT17, GT23 and GT32 are located within 15km of Cannock Chase SAC, where there is the potential for adverse recreational effects as a result of the proposed development on this Habitats site. At the time of writing the potential impact of development on other Habitats sites is uncertain; the emerging HRA will provide more detailed analysis of likely impacts and identification of impact pathways beyond those considered in the SA.
- J.3.5.9 These eight sites are also located within an IRZ which states that *"strategic solutions for recreational impacts are in place. Please contact your Local Planning Authority as they have the information to advise on specific requirements"*. The proposed development at these sites could potentially have adverse impacts on the features for which nearby SSSIs (i.e. those underpinning Cannock Chase SAC) have been designated. Consultation with Natural England would clarify whether the type of small-scale development proposed at these sites will be likely to have adverse impacts on SSSIs.
- J.3.5.10 Site GT14 is located approximately 20m from 'Essington Wood' ancient woodland. Site GT17 is located approximately 100m from 'Wyrley and Essington Canal' LNR. Site GT32 is located adjacent to 'Bridgetown Subsidence Pools, Cannock' SBI. The proposed development at these sites could potentially result in adverse impacts on these designations, due to an increased risk of development-related threats and pressures.
- J.3.5.11 In accordance with Policy HC9 and national policy, the proposed sites will be expected to deliver 10% biodiversity net gain. However, at this stage of the planning process, there is the potential for the development of these sites to have minor negative impacts on biodiversity in the short term (SA Objective 3).

Landscape and Townscape

- J.3.5.12 All sites lie within the West Midlands Green Belt. The release of Green Belt land at Site GT08 is considered by the Green Belt Study to result in 'very high' levels of harm to the purposes of the Green Belt. Development of Sites GT06, GT07, GT14 and GT23 could cause 'high' levels of harm. Development of Site GT01 could cause 'moderate-high' levels of harm. Development of Sites GT18 and GT32 are considered to result in 'moderate' and 'low-moderate' harm to the Green Belt purposes. Site GT17 was not assessed by the Green Belt study.
- J.3.5.13 Sites GT01 and GT07 are considered by the Landscape Sensitivity Study to be within areas of 'moderate-high' landscape sensitivity. Sites GT06 and GT23 are assessed as being within an area of 'moderate' landscape sensitivity. Additionally, Sites GT08 and GT18 are assessed as being within an area of 'low-moderate' landscape sensitivity. Sites GT14 is assessed as being within an area of 'low' landscape sensitivity and Sites GT17 and GT32 were not assessed by the Landscape Sensitivity Study.
- J.3.5.14 While many of these sites lie in areas assessed as making a substantial contribution to the purposes of the Green Belt and/or being of high sensitivity to development, the development proposed is small in scale and mitigation measures may be more successful in limiting the effects of the development on the openness of the Green Belt and/or reducing urbanising influences on the character of the Green Belt.

- J.3.5.15 All proposed pitches are located on or adjacent to existing sites for Gypsies and Travellers. The additional pitches proposed will be likely to have a negligible impact on the characteristics identified in the published landscape character assessment.
- J.3.5.16 Sites GT14 and GT17 are located in the open countryside surrounding settlements. The proposed development at these locations could potentially contribute towards urbanisation of the surrounding countryside, and alter the views experienced by exiting local residents. In accordance with Policy HC9, the proposed sites will need to ensure boundaries are carefully designed to minimise intrusion on the landscape, and that residential amenity of nearby properties is protected.
- J.3.5.17 Overall, this policy is assessed as having a minor negative impact on the landscape objective (SA Objective 4) when considering the potential impacts on the purposes of the Green Belt and areas of high landscape sensitivity.

Pollution and Waste

- J.3.5.18 Site GT32 is located adjacent to an AQMA. Sites GT01, GT08, GT14 and GT32 are located wholly or partially within 200m of main roads, including the A449 and A462. Site GT01 is also located adjacent to the railway line linking Wolverhampton to Stafford. The proposed development at these sites could potentially expose some site end users to higher levels of transport associated air and noise pollution.
- J.3.5.19 Sites GT01, GT06, GT07, GT08, GT18 and GT23 coincide with the catchment (Zone III) of a groundwater SPZ. The proposed development at these sites could potentially increase the risk of groundwater contamination within this SPZ.
- J.3.5.20 Sites GT06, GT07, GT08, GT23 and GT32 are located within 200m of a watercourse, including the Staffordshire and Worcestershire Canal, River Penk or Saredon Brook. The proposed development at these sites could potentially increase the risk of contamination of these watercourses.
- J.3.5.21 Overall, the policy has the potential to have a minor negative impact on the pollution and waste objective (SA Objective 5).

Natural Resources

- J.3.5.22 Sites GT01, GT05, GT06, GT07, GT08, GT18, GT23 and GT32 comprise previously developed land. The proposed development at these sites will be classed as an efficient use of land and would promote the conservation of natural resources.
- J.3.5.23 Sites GT14 and GT17 partially comprise previously undeveloped land, and Site GT14 coincides with ALC Grade 3 land which could potentially include BMV land. The proposed development at these sites could potentially lead to negative impacts associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils. Overall, the policy has the potential for a minor negative impact on natural resources (SA Objective 6).

Housing

- J.3.5.24 The latest evidence base studies identified a need of 162 pitches for Gypsies and Traveller households that met the national planning definition of a Traveller in the Planning Policy

for Traveller Sites (PPTS)²⁶. It has been determined that 37 pitches can be delivered through the expansion or intensification of existing sites. According to the Pitch Deliverability Assessment (2021), there is an unmet need for additional pitches at two sites, Clee Park (five pitches) and The Bungalow (two pitches). The proposed policy meets the identified need for pitches at the majority of sites and therefore a minor positive impact is anticipated in relation to the housing objective (SA Objective 7). There is the potential for the unmet need for pitches to lead to adverse impacts on community cohesion and possibly health, should existing accommodation become overcrowded.

Health and Wellbeing

- J.3.5.25 All sites are located outside the target distance to a hospital and the proposed development at these sites could potentially restrict the access of site end users to these essential health facilities. Due to the rural nature of the district and the location of hospitals in neighbouring authorities, this impact is expected at many locations.
- J.3.5.26 Site GT18 is located within the target distance to Dale Medical Practice, in Wombourne, providing sustainable access. All other sites are located outside the target distance to the nearest GP surgeries, which could potentially restrict the sustainable access to these facilities.
- J.3.5.27 Site GT18 is located within the sustainable target distance to Wombourne Leisure Centre, however, all other sites are located wholly or partially outside the target distance to the nearest leisure facilities.
- J.3.5.28 Site GT32 is located adjacent to an AQMA, and Sites GT01, GT08, GT14 and GT32 are located wholly or partially within 200m of a main road. The proposed development at these sites could potentially expose site end users to higher levels of traffic associated emissions, with adverse implications for health.
- J.3.5.29 All sites have good access to the PRow and/or cycle networks, and will be likely to provide site end users with good pedestrian and/or cycle access and encourage physical activity, with benefits for the health and wellbeing of local residents. All sites are located within 600m of a public greenspace, other than GT32. Therefore, a positive impact is expected at the majority of sites, as the proposed development will be likely to provide site end users with good access to outdoor space and a diverse range of natural habitats, which is known to have physical and mental health benefits.
- J.3.5.30 Overall, the policy is assessed as having a range of positive and negative impacts on health and wellbeing. The policy has the potential for minor negative impacts on health and wellbeing, as a result of site users being outside the target distance to health services and some site users being in proximity to sources of pollution. A minor negative impact is anticipated at this stage (SA Objective 8).

²⁶ Department for Communities and Local Government (2015) Planning Policy for Traveller Sites (PPTS) Available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/457420/Final_planning_and_travellers_policy.pdf [Date accessed: 02/11/23]

Cultural Heritage

- J.3.5.31 Site GT23 is located approximately 200m from the Grade II Listed Building 'Staffordshire and Worcestershire Canal Number 71 (Cross Green Bridge)'. Site GT14 is located approximately 190m from 'Chapel Farmhouse'. The proposed development at these two sites could potentially have adverse effects on the setting of these Listed Buildings.
- J.3.5.32 Site GT07 coincides with several heritage/archaeological features, including 'Brewood Deer Park' and 'Old Coal Shafts, East of Wyrley Cannock Colliery (No. 8)'. Sites GT01, GT06, GT08, GT14, GT17, GT23 and GT32 are located adjacent to various heritage features. The proposed development at these sites could have a potential adverse impact on the interpretation of the significance of these historic assets and/or their settings. Sites GT17 and GT18 are located within an area of high historic value. Sites GT01 and GT32 are located within an area of medium historic value.
- J.3.5.33 Overall, the policy has the potential for a minor negative impact on the significance of heritage assets and/or their settings (SA Objective 9).

Transport and Accessibility

- J.3.5.34 Sites GT01, GT06, GT08 and GT23 are located within the target distance to bus stops providing regular services, with benefits for sustainable transport options. The other six sites are located wholly or partially outside the target distance to a bus stop providing regular services, with potential adverse implications.
- J.3.5.35 Site GT01 is located within the target distance to Penkridge Railway Station, and Sites GT17 and GT32 are located within the target distance to Landywood Railway Station; the proposed development at these sites would provide sustainable access to stations and could potentially encourage use of sustainable transport. The other nine sites are located outside the target distance to the nearest railway stations, and could restrict access to sustainable transport options.
- J.3.5.36 Sites GT06, GT08, GT14 and GT32 and are well connected to the existing footpath network, providing opportunities to travel by foot. Whereas, Sites GT01, GT07, GT17, GT18 and GT23 currently have poor access to the surrounding footpath network and could lead to adverse effects on local accessibility.
- J.3.5.37 Sites GT01 and GT32 are located within the target distance to a local food store, therefore, the proposed development at these sites could potentially have a positive impact on accessibility. All other sites proposed in this policy are located outside the sustainable target distance to a convenience store.
- J.3.5.38 Overall, the policy is assessed as having a range of positive and negative impacts on transport and accessibility. The policy has the potential for minor negative impacts on transport and accessibility as a result of some site users being outside the target distance to public transport and local convenience stores as well as having limited access to the site on a footway. A minor negative impact is anticipated at this stage (SA Objective 10).

Education

- J.3.5.39 Site GT18 is located within the target distance to St Bernadettes Catholic School (primary) and Ounsdale High School. Site GT32 is located within the target distance to St Thomas

More Catholic Primary School and Great Wyrley High School. The proposed development at these two sites will be likely to situate new residents in locations with good access to primary and secondary education.

J.3.5.40 All other sites are located wholly or partially outside the target distance to schools, and therefore, the proposed development at these sites could potentially have an adverse impact on the access of new residents to primary and secondary education. Overall, the policy has the potential for a minor negative impact on access to education as the majority of sites lie outside the target distance for sustainable access to schools (SA Objective 11).

Economy and Employment

J.3.5.41 Of the nine sites selected in Policy SA4, four sites are located in areas with 'reasonable' sustainable access to employment opportunities (Sites GT06, GT08, GT14 and GT23). All other sites are located in areas outside of the Rural Services and Facilities Audit. The proposed development at the majority of sites could potentially restrict the access of site end users to employment opportunities, and therefore, a major negative impact is identified. There is the potential for a major negative impact on access to employment at this stage due to the poor sustainable access to employment in these site locations (SA Objective 12).

J.3.6 Policy SA5: Employment allocations

Policy SA5 – Employment allocations

The following sites will be allocated to ensure that the district's employment land requirements identified in Policy DS4 is met.

Site Reference	Site Name	Area (Ha) of employment site for allocation	Employment Type (Use Class ¹)
E18	ROF Featherstone	36	E(g); B2; B8
E24	I54	2.4	E(g); B2
E30	M6, Junction 13	17.6	E(g); B2; B8
E44	I54 western extension (north)	16.7	E(g); B2
E33	West Midlands Interchange (WMI).	297	B8

¹ As defined by the Town and Country Planning (Use Classes) Order 1987 (as amended).

The above sites represent those within the district's pipeline supply of sites as at April 2023 without a full planning permission, in addition to West Midlands interchange.

West Midlands Interchange (E33)

The WMI employment site allocation (E33) is for a Strategic Rail Freight Interchange (SRFI) and will be progressed in-line with the Development Consent Order (DCO) that granted permission on 4 May 2020. WMI remains washed over by Green Belt.

Development proposals should be consistent with other Local Plan policies

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Reference	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
SA5	-	--	-	-	-	-	0	-	-	-	0	++

J.3.6.1 Each reasonable alternative employment site has been separately assessed in Appendix B of the Regulation 18 (III) SA Report²⁷, Appendix F of the Regulation 19 SA Report²⁸, or **Appendix G** of this report. Each site has a range of positive and negative effects identified on the SA Objectives. A summary of the assessment of all reasonable alternative sites is presented in **Appendix H**.

J.3.6.2 The West Midlands Rail Freight Interchange (the largest employment allocation within Policy SA5) has been granted development consent through a Development Control Order (DCO). The application for a DCO was accompanied by an Environmental Statement. The Non-Technical Summary (NTS)²⁹ outlines the likely significant environmental effects of the proposals.

J.3.6.3 The proposals do not include residential development and therefore a negligible effect on housing is identified (SA Objective 7). The policy is also expected to result in a negligible impact on provision of and access to education (SA Objective 11).

Climate Change Mitigation

J.3.6.4 In general, the construction, occupation and operation of employment development allocated through Policy SA5 would be likely to exacerbate GHG emissions, to some extent.

J.3.6.5 In relation to the largest allocation, the WMI Site E33, the development seeks to support moving goods traffic from road transport to rail to help reduce carbon emissions and provide economic benefits. The project website³⁰ states that rail freight produces 70% less carbon dioxide, up to 15 times lower nitrogen oxide emissions and nearly 90% lower particulate emissions than road freight, as well as de-congestion benefits. There is the potential for a minor positive effect on the emission of GHGs at this site.

²⁷ Lepus Consulting (2021) Sustainability Appraisal of the South Staffordshire Local Plan Review: Preferred Options Plan – Regulation 18 (III) SA Report, August 2021. Available at: <https://www.sstaffs.gov.uk/local-plan-review-evidence-base> [Date accessed: 21/02/24]

²⁸ Lepus Consulting (2022) Sustainability Appraisal of the South Staffordshire Local Plan Review: Regulation 19 SA Report, October 2022. Available at: https://www.sstaffs.gov.uk/sites/default/files/2023-02/02_sa_volume_2_october_2022.pdf [Date accessed: 02/02/24]

²⁹ Ramboll (July 2018) West Midlands Rail Freight Interchange Order 201X Environmental Statement - Non-technical summary (NTS) Regulation 5(2)(a) Available at <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR050005/TR050005-000451-Doc%206.3%20-%20Non-Technical%20Summary.pdf> [Date accessed: 21/02/24]

³⁰ West Midlands Interchange. Available at: <https://www.westmidlandsinterchange.co.uk/> [Date accessed: 21/02/24]

- J.3.6.6 Mixed positive and negative effects are likely, resulting in potential for a minor negative impact on climate change mitigation overall (SA Objective 1).

Climate Change Adaptation

- J.3.6.7 Sites E18 and E24 coincide with areas of Flood Zone 2 and 3. The proposed development at these two sites could potentially locate some site end users in areas at risk of fluvial flooding, and therefore, a major negative impact is identified. The other allocations are located wholly within Flood Zone 1, in an area of lowest flood risk.
- J.3.6.8 Sites E18, E33 and E44 coincide with areas of land determined to be at low, medium and high risk of surface water flooding. The proposed development at these sites could be expected to have a major negative impact on surface water flood risk, as development could potentially locate some site end users in areas at high risk of surface water flooding, as well as exacerbate surface water flood risk in surrounding locations.
- J.3.6.9 The proposed development at WMI Site E33 includes mitigation measures developed through the EIA process, including a drainage strategy for the operations stage, comprising a network of swales and balancing ponds which will control the flow of water from the site and provide several stages of treatment to address diffuse pollution. Following the implementation of mitigation, no significant adverse effects were identified with regard to the water environment. It is likely there will be a negligible effect at this site.
- J.3.6.10 Overall, at this stage of the planning process a major negative impact is recorded in the matrix for SA Objective 2, following the principle of recording the worse-case assessment for each criterion of an objective.

Biodiversity and Geodiversity

- J.3.6.11 All employment allocations are located within 15km from Cannock Chase SAC.
- J.3.6.12 For the WMI Site E33, the DCO was accompanied by a 'Habitats Regulations Statement'³¹ which concluded that there were no Likely Significant Effects on Cannock Chase SAC or other Habitats sites as a result of the proposed development.
- J.3.6.13 Site E33 is located within a SSSI IRZ which states that "*Large non residential developments outside existing settlements/urban areas where net additional gross internal floorspace is > 1,000m² or footprint exceeds 0.2ha*" should be consulted on with Natural England.
- J.3.6.14 Site E44 is located in close proximity to ancient woodland, with potential to increase risk of disturbance. Site E33 is adjacent to 'Gailey Reservoirs' SBI. Sites E18 and E33 coincide with deciduous woodland priority habitat. The proposed development at these locations could result increased development related threats and pressures on these biodiversity designations and result in the loss/degradation of priority habitats.

³¹ Ramboll (2018) West Midlands Interchange: Habitats Regulations Statement – No Significant Effects Report. Available at <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR050005/TR050005-000310-Doc%205.3%20-%20HRA%20-%20No%20Significant%20Effects%20Report.pdf> [Date accessed: 21/02/24]

- J.3.6.15 The Environmental Statement in relation to the WMI Site E33 found significant residual effects are likely in relation to biodiversity. This is balanced in part through the provision of significant new and enhanced habitat including the proposed community parks and off-site farmland bird mitigation land, to be maintained in the long term, which will provide benefits to a range of wildlife, and which will be managed for the duration of the operational phase. The habitats created will help to address local and national biodiversity action plan targets.
- J.3.6.16 Despite potential for new and enhanced habitat at Site E33, overall, a minor negative effect on biodiversity is likely as a result of the employment allocations collectively (SA Objective 3).

Landscape and Townscape

- J.3.6.17 Site E33 is located in areas which could cause 'high' harm to the purposes of the Green Belt, according to the Green Belt Study, with potential to cause a significant adverse effect on this receptor.
- J.3.6.18 Sites E33 and E18 are located in areas which are of 'low-moderate' sensitivity according to the Landscape Sensitivity Study, with potential to result in a minor adverse effect on the landscape. The remaining sites are either of 'low' sensitivity or are outside of the study area, where negligible effects on landscape sensitivity will be likely.
- J.3.6.19 The majority of the allocations have potential to be discordant with the existing landscape surroundings, contribute towards urbanisation of the countryside, and may adversely affect views experienced by users of the PRoW network.
- J.3.6.20 Site E33 is located approximately 3km from Cannock Chase AONB. Residual landscape and visual effects were identified taking into account the embedded mitigation measures, including minor adverse effects on the landscape character of Cannock Chase AONB; significant adverse permanent effects were identified on visual receptors during operation, relating to certain properties with views of the proposed development. It is anticipated that these effects will reduce during the completed development phase as the proposed landscaping matures.
- J.3.6.21 Overall, a minor negative effect on landscape is likely (SA Objective 4).

Pollution and Waste

- J.3.6.22 Sites E18 and E24 are located partially within 200m of AQMAs, and all sites except E24 are located within 200m of main roads. The proposed development at these sites could potentially expose some site end users to higher levels of transport associated air and noise pollution.
- J.3.6.23 Sites E18, E24, E33 and E44 coincide with the catchment (Zone III) of a groundwater SPZ. The proposed development at these sites could potentially increase the risk of groundwater contamination within this SPZ, and therefore, result in a minor negative impact on local groundwater resources.
- J.3.6.24 Sites E18, E24, E30 and E33 are located within 200m of watercourses. The proposed development at these sites could potentially increase the risk of contamination of these watercourses, and therefore, a minor negative impact is identified.

J.3.6.25 In relation to the WMI Site E33, an increase in road traffic was predicted to have a significant adverse impact on air quality in relation to one group receptor (3-4 residential properties located adjacent to the east of the M6), however, this is due to the high baseline concentrations present. Negligible to slight residual effects were identified in relation to operational traffic on other human receptors adjacent to the road network. Noise generated by increased traffic on the local road network and by plant, rolling stock, vehicles and machinery in use, once operational, is likely to give rise to moderate adverse effects at a number of receptors around the site. Noise insulation will be offered for residential properties where there are significant effects. No significant effects are anticipated from vibration.

J.3.6.26 Overall, there is likely to be a minor negative effect on pollution and waste (SA Objective 5).

Natural Resources

J.3.6.27 In relation to agricultural land and loss of soils, all sites comprise (either wholly or partially) previously undeveloped land which contains ALC Grades 2 or 3.

J.3.6.28 The WMI Site E33 comprises 17.2% Grade 2, 41% Subgrade 3a, 12.9% Subgrade 3b and 28.9% non-agricultural land. While the proposals at Site E33 for GI and new country parks will help to retain some soils, the assessment found significant residual effects as a result of the permanent loss of BMV agricultural land.

J.3.6.29 Overall, a minor negative effect on natural resources as a result of the allocations within Policy SA5 will be likely (SA Objective 6).

Health and Wellbeing

J.3.6.30 Due to the nature of the employment allocations, many of the sites are located in areas that are close to main roads where air quality is likely to be relatively poor, and are further away from local centres providing healthcare facilities. Further development in these locations may result in worsening of air quality, with potential to increase exposure of humans to poor air quality with implications for human health.

J.3.6.31 As described under the pollution and waste objective, effects on human health were largely negligible to slight regarding the WMI Site E33. The proposals for this site include the creation of a new country park, offering increased opportunities for access to open space and recreation. Minor adverse effects were identified in relation to amenity during operation at local level.

J.3.6.32 A range of minor positive and negative effects on health and wellbeing are likely, and in line with the precautionary principle, a minor negative impact is identified overall (SA Objective 8).

Cultural Heritage

J.3.6.33 Sites E30 and E33 are located in close proximity to Grade II Listed Buildings, with potential to result in adverse impacts on their settings. Site E33 is also located in close proximity to several SMs including 'Roman Fort W of Eaton House' SM. All employment sites apart from E24 are coincident with or adjacent to archaeological features, which may be sensitive to development.

- J.3.6.34 Site E33 in particular could affect a range of features including: Neolithic and Bronze Age ring ditches; potential Romano-British remains; potential buried remains associated with the Anglo-Saxon and Medieval settlement at Gailey; features associated with Anglo-Saxon agricultural practices; potential buried remains associated with the route of the Staffordshire and Worcestershire Canal and Grand Junction Railway; and other as-yet unidentified, potential buried archaeological remains. Preservation by record through excavation of features, supplemented by public outreach works was considered to be appropriate mitigation. Residual effects were assessed as between insignificant and minor to moderate adverse, depending on the nature of any features. In relation to above-ground cultural heritage receptors, no significant effects were identified relating to Straight Mile Farm and the settings of all off-site designated features and features related to the wider historic landscape. A minor adverse effect was identified relating to the demolition of locally listed Heath Farm. Minor direct and indirect effects on the Staffordshire and Worcestershire Canal were identified. Overall, no significant residual effects were identified in relation to above ground cultural heritage for Site E33.
- J.3.6.35 There is uncertainty in the potential effects on cultural heritage due to archaeological features which may be encountered on site at the allocations within Policy SA5. There is a potential minor negative effect in relation to cultural heritage (SA Objective 9).

Transport and Accessibility

- J.3.6.36 All employment sites are located outside of the target distance to railway stations. All sites, with the exception of E18, are well connected to the existing footpath networks, and all sites are well connected to the highway network. As such, mixed effects could be expected in relation to transport and accessibility, according to the baseline assessments with potential reliance on private car use for employees at many locations.
- J.3.6.37 In relation to the WMI Site E33, the site is located at a strategic location in the national highway network, close to Junction 12 of the M6, close to the M54 and linked directly by the A5 and A449. The site is well served by cycle lanes which will facilitate cycle access from nearby train stations at Cannock and Penkridge, and population centres at Cannock, Penkridge, and Wolverhampton. The proposals include provision of a shuttle bus service between large population areas and the site, provision of new and extended public bus services, and new infrastructure to address existing issues with crossings, footways and cycleways, as well as improvements to the canal towpath. The Transport and Access chapter of the Environmental Statement found a range of effects between negligible to minor/moderate adverse, with beneficial effects for the A449 and Station Road. The scheme proposes a new Strategic Rail Freight Interchange, the purpose of which is to move goods transport from the road network to the rail network, leading to overall reductions in heavy goods vehicle movements and reduction in GHG emissions in comparison to road transport.
- J.3.6.38 Overall, a mixture of positive and negative effects on traffic and transport is likely, with a minor negative impact recorded overall in line with the precautionary principle (SA Objective 10).

Economy and Employment

- J.3.6.39 In relation to employment opportunities, all allocated sites within this policy will seek to increase employment floorspace within South Staffordshire including E(g), B1, B2 and B8 use classes providing a range of jobs for new and future residents.
- J.3.6.40 In relation to the WMI Site E33, long term minor beneficial effects were identified in relation to construction and demolition employment. Long term major beneficial effects were identified in relation to operational employment and wider economic effects of operation which will apply at local and district levels. Long term minor beneficial effects were identified in relation to operational employment at West Midlands Interchange Travel to Work Area (TTWA) level and wider economic effects of operation at National level.
- J.3.6.41 Overall, there is likely to be a major positive impact on the economy and employment (SA Objective 12).

J.4 Delivering the right homes

J.4.1 HC1: Housing mix

HC1: Housing mix

The council will support development that creates mixed, sustainable and inclusive communities, and contributes to the objectives of the adopted Housing and Homelessness Strategy.

All new housing developments should provide a mixture of property sizes, types and tenures in order to meet the needs of different groups in the community. Proposals must contribute to better balancing the district’s housing market, particularly by increasing the supply of 2 and 3 bedroom homes in all areas, especially on the open market.

On major development housing sites (excluding sites exclusively provided for self-build or custom housebuilding), the market housing must include a minimum of 70% of properties with 3 bedrooms or less, with the specific mix breakdown to be determined on a site-by-site basis and reflective of need identified in the council’s latest Housing Market Assessment.

All major development must also contribute to meeting the needs of the district’s ageing population in accordance with Policy HC4.

The provision of affordable housing will be required in accordance with Policy HC3. Affordable housing should provide a range of property sizes, with the specific mix to be determined on a site-by-site basis and reflective of need identified in the council’s latest Housing Market Assessment, the council’s housing waiting list, parish need surveys and information from local Registered Providers.

The housing mix of all major development sites will be secured via appropriate means e.g. condition or Section 106 agreement for outline applications, to provide a clear indication of the council’s expectations at an early stage.

Sites of less than 10 dwellings should provide a mixture of property sizes and reflect the need identified in the council’s latest Housing Market Assessment, where consistent with other local plan policies.

Any development that fails to make efficient use of land by providing a disproportionate amount of large, 4+ bedroom homes compared with local housing need will be refused, in accordance with the requirements of this policy and Policy HC2.

Development proposals should be consistent with other Local Plan policies.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
HC1	0	0	0	0	0	+/-	+	+	0	0	0	0

J.4.1.1 An appropriate mix of housing is required across the Plan area to help to ensure that the varied needs of current and future residents are met. In particular, this may include an increased number of smaller homes which will be likely to help provide appropriate accommodation for the elderly, first-time buyers and young families.

J.4.1.2 Strategic Policy HC1 seeks to ensure that residential developments provide a mixture of property sizes, types and tenures and focuses on ensuring proposals prioritise an efficient use of land. This will likely have a minor positive impact on local housing provision (SA Objective 7) and may serve to reduce the loss of soils, however, this is uncertain as the policy does not specify locations (SA Objective 6). By providing affordable housing, this policy will help to meet the varying needs of residents, and as such, have a minor positive impact on health and wellbeing (SA Objective 8).

J.4.2 HC2: Housing density

HC2: Housing density

Housing developments will achieve a minimum net density of 35 dwellings per net developable hectare in developments within or adjoining Tier 1 settlements and in infill locations within the built-up area of Tier 1-3 settlements across the district. In achieving this standard across a development as a whole, densities of different areas within a scheme may vary where justified by local character impacts and provision of services and facilities.

The net density on a site may go below the minimum density standard set above if to do otherwise would demonstrably result in adverse impacts to the surrounding area’s historic environment, settlement pattern or landscape character or would prevent the delivery of other Local Plan policy requirements.

In central areas where it would help to support the delivery of new local services and facilities, sites will be encouraged to exceed this minimum density standard where this could be done in a manner consistent with other development plan policies, particularly those relevant to the character of the surrounding area.

In areas not covered by the minimum density standards set out above, the appropriate density of a scheme will be determined on a case-by-case basis. In doing so it will have regard to the location of the site relative to services and facilities and other development plan policies, such as those addressing local design, character and housing mix requirements. All housing developments should make efficient use of land, whilst ensuring they still meet the requirements of other Local Plan policies.

Development proposals should be consistent with other Local Plan policies.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Reference	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
HC2	+/-	0	0	0	0	+/-	+	0	0	0	0	0

J.4.2.1 Policy HC2 seeks to encourage an efficient use of land by increasing density of development in appropriate locations.

J.4.2.2 Pursuing increased housing densities in appropriate areas will help the Council to provide more housing across the Plan area, and as such, lead to a minor positive impact on housing (SA Objective 7). The policy may help to reduce the overall land-take to deliver housing needs across the Plan area and serve to reduce negative effects on loss of soil and BMV agricultural land, although this effect is uncertain as it is dependent on the location of development (SA Objective 6). By using land efficiently, there will be opportunities for new communities to be located in closer proximity to existing facilities and services and in

proximity to sustainable transport choices, possibly reducing reliance on private car use and reducing GHG emissions, although the extent to which this could be achieved is uncertain (SA Objective 1).

- J.4.2.3 The policy states that densities will vary in accordance with the surrounding landscape and high-density development will not result in adverse impacts on surrounding historic environment, allowing net density on a site to go below the minimum density where necessary to avoid or mitigate adverse impacts. Overall, a negligible impact on the local landscape and historic environment is identified (SA Objectives 4 and 9). The policy could be enhanced through ensuring that higher density development is only pursued where this would not affect the setting or significance of heritage assets.

J.4.3 HC3: Affordable housing

HC3: Affordable housing

All proposals for major housing development will be required to provide 30% affordable housing. This includes any development which provides self-contained units for day-to-day private domestic use, regardless of use class and whether care is provided to residents.

The affordable housing should then be broken down by tenure as follows:

- 25% First Homes
- 50% Social Rent
- 25% Shared Ownership

The council will consider what local eligibility criteria should be implemented for the delivery of First Homes and detail these in the Affordable Housing SPD. The mix of property sizes and types of affordable housing will be determined in accordance with Policies HC1 and HC4.

The council will apply a Vacant Building Credit and reduce the affordable housing requirement as required, in accordance with national policy and the Affordable Housing SPD.

Applications may be refused where a single site has been subdivided into smaller parcels in order to circumvent the affordable housing threshold. Where permission has been granted for a scheme and a subsequent application is made which clearly forms part of a single development, then the full affordable housing requirement will be required for the total number of dwellings proposed across all relevant applications.

The council requires new development to contribute towards mixed and sustainable communities, therefore affordable housing should be provided on site and fully integrated with market housing. This should be achieved by suitably pepper potting the affordable housing across the site, ensuring it is materially indistinguishable from market housing in both siting and design and otherwise provided in accordance with the Affordable Housing SPD.

Affordable housing will be secured in perpetuity and monitored via an appropriate legal means e.g. Section 106 agreement, subject to Right to Buy/Acquire, staircasing and mortgagee in possession provisions. Delivery must be phased with the market housing on site in accordance with triggers specified in the Section 106 agreement.

Shared ownership housing will be subject to staircasing restrictions in Designated Protected Areas in accordance with the relevant legislation, in order to safeguard new provision.

Offsite and/or financial contributions in lieu of onsite provision of affordable housing will only be acceptable in exceptional circumstances. In such cases, the applicant will be required to provide clear justification for not providing affordable homes on site, and demonstrate how an offsite contribution will contribute to mixed and sustainable communities.

HC3: Affordable housing

Planning applications that comply with up-to-date policies in this plan will be assumed to be viable. Consideration will not be given to reducing the affordable housing contribution on the grounds of viability unless the applicant can first demonstrate to the satisfaction of the council that particular circumstances justify a viability assessment at application stage, as per the PPG.

Further guidance on the requirements of implementing this policy will be provided in the adopted Affordable Housing SPD.

Development proposals should be consistent with other Local Plan policies.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Reference	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
HC3	0	0	0	0	0	0	+	+	0	0	0	0

J.4.3.1 Strategic Policy HC3 seeks to ensure that the South Staffordshire Local Plan delivers an appropriate mix of affordable housing that meets the varied needs of current and future residents.

J.4.3.2 This policy sets out the requirements for affordable housing in South Staffordshire, to ensure that suitable residential development is provided to meet the social and economic needs of the population. Therefore, this policy is expected to have a minor positive impact on meeting housing needs as well as human health and wellbeing (SA Objectives 7 and 8).

J.4.4 HC4: Homes for older people and others with special housing requirements

HC4: Homes for older people and others with special housing requirements

The council will continue to work with Registered Providers, developers and other stakeholders to secure homes which meet the needs of older people and other groups with specialist requirements.

All major housing developments will be required to demonstrate how the proposal clearly contributes to meeting the needs of older and disabled people. The council will expect housing, as part of the wider mix on the site, to be provided in the following forms in order to provide a range of general and specialist housing options and meet the objectives of the adopted Housing and Homelessness Strategy:

- Bungalows
- Other age restricted single storey accommodation such as flats and maisonettes
- Sheltered/retirement living
- Extra care/housing with care and other supported living

Homes suitable for older and disabled people should be provided within both the market and affordable sectors, with the specific mix further guided by the Housing Market Assessment, local housing need surveys and the Housing Register.

All major developments will also be required to ensure 100% of both the market and affordable housing meets the higher access standards Part M4(2) Category 2: Accessible and adaptable dwellings of Building Regulations. Additional weight will be given to the provision of properties also accessible for wheelchair users.

Development proposals should be consistent with other Local Plan policies.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Reference	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
HC4	0	0	0	0	0	0	+	+	0	0	0	0

J.4.4.1 Over the Plan period, it is likely that there will be an increase in the need for homes for the elderly and those in need of specialist care. It is expected that people over the age of 60 will require different types of housing of various sizes and tenures, and those over 80 will have particular needs for specialist forms of housing, including some homes with care provision and access for those with reduced mobility. Strategic Policy HC4 aims to provide suitable accommodation for older residents within South Staffordshire and therefore will likely have a minor positive impact on housing (SA Objective 7) within the Plan area.

J.4.4.2 By providing appropriate homes for residents across the Plan area, including accessible and adaptable dwellings for wheelchair users, this policy is expected to result in benefits to the health and wellbeing of these residents. In addition, this policy will be likely to help support a more inclusive and vibrant community, and therefore, a minor positive impact on health and wellbeing is identified (SA Objective 8).

J.4.5 HC5: Specialist housing

HC5: Specialist housing

The council will enable and strongly support proposals for the provision of specialist housing of all tenures, particularly those that will contribute to meeting the needs of the district’s ageing population, subject to the proposed development meeting all of the following criteria:

- a) Suitable in size and scale in relation to the existing settlement
- b) Well integrated with the settlement (in terms of siting and design) in order to promote and encourage interaction with existing communities
- c) Situated in a sustainable location within safe walking distance of key services, facilities and public transport links
- d) Suitable provision is made of attractive landscaping and high quality outdoor recreational spaces
- e) Suitable and safe parking provision for residents, staff, visitors and emergency services

Specialist housing may be in the form of age-restricted accommodation, retirement, sheltered, extra-care, housing with care, nursing/residential homes or other forms of supported living.

The loss of specialist accommodation will not be supported unless required to increase the overall quantity of specialist homes in the local area, or improve quality where existing provision is no longer fit for purpose (e.g. through redevelopment or relocation).

The council will work with Staffordshire County Council and registered providers in order to identify specific opportunities and sites for specialist housing.

Development proposals should be consistent with other Local Plan policies.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Reference	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
HC5	0	0	0	0	0	0	+	+	0	0	0	0

J.4.5.1 Policy HC5 aims to provide suitable accommodation for those with specialist needs within South Staffordshire including some homes with care provision and access for those with reduced mobility. The policy includes resisting proposals which may result in the loss of specialist accommodation; therefore, this policy will be likely to have a minor positive impact on housing and specialist accommodation provision (SA Objective 7).

J.4.5.2 By providing specialist and supported homes for residents across the Plan area, this policy is expected to result in benefits to the health and wellbeing of these residents. In addition, this policy will be likely to help support a more inclusive and vibrant community, and therefore, a minor positive impact on health and wellbeing is identified (SA Objective 8).

J.4.6 HC6: Rural exception sites

HC6: Rural exception sites

As an exception to planning policies relating to the location of housing development in the district, small rural exception sites of 100% affordable housing to meet the identified needs of local people will be supported where all of the following criteria are met:

- a) The site lies immediately adjacent to the development boundary of the settlement
- b) An affordable housing need has been identified in the parish through a robust housing need survey, which considers all tenures of affordable housing identified in the NPPF definition, for the type, tenure and scale of development proposed. In parishes with more than one settlement, the survey should include data or be supplemented with additional information to demonstrate the housing need specifically in the settlement in which the development is proposed.
- c) The proposed development is proportionate in size and scale in relation to the existing settlement, having regard to its role in the settlement hierarchy
- d) The initial and subsequent occupancy is controlled through planning conditions and/or legal agreements to ensure the accommodation remains affordable and for local people in housing need in perpetuity.
- e) The proposed development respects the scale, character and local distinctiveness of its surroundings.

The council will work proactively with Registered Providers and community organisations to identify opportunities for rural exception sites to deliver affordable housing over and above the housing supply set out in this plan. The council will require Parish Councils to be engaged in the process and a Rural Housing Enabler commissioned to consult with local communities and provide an independent assessment of local need. Any housing need survey and supporting information submitted to evidence local housing need should be no more than 3 years old, at the point of application submission, to be considered an up-to-date, robust assessment.

In exceptional circumstances in areas outside the Green Belt, a maximum of 10% market housing may be permitted at the council's discretion, where it can be robustly demonstrated to be essential to the viability of the scheme. In such cases, the market housing must be fully integrated with, and of a consistent standard and design as, the affordable homes in accordance with the adopted Affordable Housing SPD.

Development proposals should be consistent with other Local Plan policies.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
HC6	0	0	0	0	0	+/-	+	0	0	0	0	0

J.4.6.1 Rural exception sites are small sites used for affordable housing in perpetuity where sites would not typically be used for housing³². Paragraph 82 of the NPPF³³ states that "*In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs ... Local planning authorities should*

³² DLUHC (2023) National Planning Policy Framework, December 2023. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework-2> [Date accessed: 22/12/23]

³³ Ibid

support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs, and consider whether allowing some market housing on these sites would help to facilitate this”.

- J.4.6.2 Policy HC6 will help to meet the housing requirements and increase the provision of affordable housing across the Plan area, leading to a minor positive impact on housing (SA Objective 7).
- J.4.6.3 Rural exception sites could potentially be located on previously undeveloped land in the Open Countryside. As such, development proposals could potentially result in the loss of soil, although, without knowledge of specific locations the effect on natural resources is uncertain (SA Objective 6).

J.4.7 HC7: First homes exception sites

HC7: First homes exception sites

As an exception to planning policies relating to the location of housing development in the district, small exception sites of primarily First Homes to meet the needs of local people will be supported where all of the following criteria are met:

- a) An evidenced need for First Homes exists within the district which is not already being met within the local authority area
- b) The site lies outside the Green Belt and is immediately adjacent to the development boundary of the settlement
- c) The proposed development is of a proportionate size and scale in relation to the existing village, taking into account the size of the settlement having regard to its role in the settlement hierarchy
- d) No more than 10% of the site is provided as market housing and the applicant has sufficiently demonstrated this is required for the viability of the development where grant funding is unavailable and/or there are abnormal site costs
- e) The need for other affordable tenures has been considered and limited provision has been made on the site accordingly to reflect the significant need in the district
- f) The initial and subsequent occupancy of properties is controlled through planning conditions and/or legal agreements to ensure the accommodation remains affordable and for local people in housing need in perpetuity
- g) The proposed development respects the scale, character and local distinctiveness of its surroundings, and complies with any other local design policies and guidance

The council will consider what local eligibility criteria should be implemented for the delivery of First Homes and detail these in the Affordable Housing SPD.

In cases where a mixture of tenures is provided, all properties must be fully integrated and of a consistent standard and design, in accordance with the adopted Affordable Housing SPD.

Development proposals should be consistent with other Local Plan policies.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Reference	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
HC7	0	0	0	0	0	+/-	+	+	0	0	0	0

- J.4.7.1 Policy HC7 supports development of first homes within small unallocated sites adjacent to defined settlement development boundaries, but outside of Green Belt, subject to a range of criteria as set out in the policy.
- J.4.7.2 PPG defines first homes as “*a specific kind of discounted market sale housing and should be considered to meet the definition of ‘affordable housing’ for planning purposes*”, which are available only to first-time buyers at a discount of at least 30% below market value³⁴. Policy HC7 seeks to deliver first homes in areas where there is a proven unmet local need.
- J.4.7.3 This policy will contribute towards meeting housing requirements and increase the provision of affordable housing across the Plan area, helping first-time buyers to enter the housing market. Therefore, a minor positive impact on housing is identified (SA Objective 7).
- J.4.7.4 Furthermore, by providing affordable first homes, this policy will help to meet the varying needs of residents and provide opportunities for more inclusive communities. The policy has the potential to have a minor positive impact on health and wellbeing (SA Objective 8).
- J.4.7.5 The policy states that first homes sites will be permitted adjacent to existing development boundaries; as such, sites could potentially be located on previously undeveloped land. Although the policy restricts their size, development proposals under this policy will have potential to result in the loss of soil to some extent, although, without knowledge of specific locations the effect on natural resources is uncertain (SA Objective 6).
- J.4.7.6 Policy HC7 seeks to ensure that the proposed development “*respects the scale, character and local distinctiveness of its surroundings, and complies with any other local design policies and guidance*”. These measures could potentially help to minimise any adverse impacts on accessibility and landscape, resulting in negligible impacts for SA Objectives 4 and 10.

³⁴ DLUHC & MHCLG (2021) Guidance: First Homes. Available at: <https://www.gov.uk/guidance/first-homes> [Date accessed: 06/11/23]

J.4.8 HC8: Self-build and custom housebuilding

HC8: Self-build and custom housebuilding

The council will support the provision of self-build and custom housebuilding schemes and plots throughout the district, where in conformity with other Local Plan policies, in order to ensure a wide range of housing options are available to residents and to meet bespoke needs. The council will work positively with developers, Registered Providers, self and custom build associations and other community groups to bring forward schemes in order to meet demand as evidenced on the self-build register.

Major developments will be required to have regard to the need on the council's self-build register, and make provision of self and custom build plots to reflect this. The council may require a design code to be agreed with the applicant and implemented for development of the plots.

Developers will be required to actively market plots at a reasonable price for a minimum of 12 months from the date the relevant planning permission is issued. If after this period, the plot has not been sold, the developer will be permitted to build out the plot as a standard property type, for the same tenure as was first approved. Requirements for marketing and notifying the council will be secured through a Section 106 agreement.

Development proposals should be consistent with other Local Plan policies.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Reference	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
HC8	0	0	0	0	0	0	+	0	0	0	0	0

J.4.8.1 Policy HC8 seeks to meet the needs of those wishing to build and customise their own homes. The policy aims to support self-build and custom house building proposals with regard to any other policies and large-scale proposed residential developments in place, in line with the requirements of the NPPF.

J.4.8.2 This policy will help to ensure that new housing delivered across the Plan area can accommodate the diverse requirements of current and future residents within South Staffordshire, and therefore, a minor positive impact on housing is identified (SA Objective 7).

J.4.9 HC9: Gypsy, Traveller and Travelling Showpeople

HC9: Gypsy, Traveller and Travelling Showpeople

All applications for Gypsy, Traveller and Travelling Showpeople pitches or plots will only be supported where all of the following criteria are met:

- a) Essential services such as power, water, drainage, sewage disposal and refuse/waste disposal are provided on site.
- b) The site is well designed and landscaped with clearly demarcated site and pitch boundaries using appropriate boundary treatment and landscaping sympathetic to, and in keeping with, the surrounding area. Where tree and hedgerow boundaries border the site these should be retained and where possible strengthened.
- c) A minimum 10% biodiversity net gain is demonstrated in accordance with Policy NB2.
- d) The amenity of the site's occupiers and neighbouring residential properties is protected in accordance with Policy HC11. Sites must be designed to ensure privacy between pitches and between the site and adjacent users, including residential canal side moorings. Proposals for caravans in residential gardens will be refused where they have an adverse impact on the amenity of neighbouring properties.
- e) The site can be safely and adequately accessed by vehicles towing caravans, is well related to the highway network, and provides adequate space within the site to accommodate vehicle parking and turning space to accommodate the occupants of the site.
- f) The proposal, either in itself or cumulatively having regard to existing neighbouring sites, is of an appropriate scale so as to not put unacceptable strain on infrastructure or dominate the nearest settled communities, to avoid problems of community safety arising from poor social cohesion with existing families.
- g) Pitches are of an appropriate scale for the size and number of caravans to be accommodated, without over-crowding or unnecessary sprawl. Site intensification or extensions resulting in additional pitches may be considered acceptable in principle, subject to it being for a proven existing local family need, and acceptable in terms of other planning policies and licencing requirements. A single pitch to accommodate immediate family should only consist of one static caravan and one tourer caravan unless it can be demonstrated that additional caravans are necessary on the pitch to avoid overcrowding.
- h) Built development in the countryside outside the development boundaries is kept to the minimum required, in order to minimise the visual impact on the surrounding area. Where proposals are in the Green Belt, proposals will only be acceptable where they conform to Policy DS1. The proposed allocations of new pitches in the Green Belt set out in Policy SA4 will be acceptable in principle, subject to conformity with Policy SA4 and all criteria in this policy.
- i) Any amenity buildings proposed should be of an appropriate scale and reasonably related to the size of the pitch or pitches they serve.
- j) Proposals must not be located in areas at high risk of flooding.
- k) Where the proposal is for travelling showperson provision, the site is large enough for the storage, maintenance and testing of items of mobile equipment, and should not have an unacceptable impact on the amenity of neighbouring residential properties, including canal side residential moorings.
- l) Where the proposal is for a transit site, proposals avoid locations that are accessed via narrow country lanes and be in locations with good access to the strategic highway network.

Applications for pitches from individuals that do not meet the planning definition set out in Annex 1 of Planning Policy for Traveller Sites will also be considered in line with this criteria-based policy and other relevant policies on a case-by-case basis.

Development proposals should be consistent with other Local Plan policies.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Reference	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
HC9	0	+	0	0	+	0	+	+	0	0	0	0

- J.4.9.1 In accordance with the Planning policy for traveller sites³⁵, Gypsies and Travellers are defined as *"Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such"*.
- J.4.9.2 Travelling Showpeople are defined as *"Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above"*³⁶.
- J.4.9.3 Policy HC9 is expected to ensure the sufficient provision of high-quality pitches and plots for the Gypsy, Traveller and Travelling Showpeople communities within South Staffordshire which addresses the likely permanent and transit accommodation needs. Therefore, the policy is identified to have a minor positive impact on housing (SA Objective 7).
- J.4.9.4 The policy sets out criteria which includes aiming to ensure future pitch and plot development will provide access to essential services and that areas of high flood risk will be avoided, potentially having minor positive effects on pollution (SA Objective 5), health and wellbeing (SA Objective 8) and climate change adaptation (SA Objective 2). The policy sets out criteria which aim to ensure future pitch and plot development do not result in adverse impacts on biodiversity, landscape or transport, and as such negligible impacts have been identified for SA Objectives 3, 4 and 9.

³⁵ MHCLG (2015) Planning policy for traveller sites. Available at: <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites> [Date accessed: 02/11/23]

³⁶ Ibid

J.5 Design and space standards

J.5.1 HC10: Design requirements

HC10: Design requirements

The council will require the design of all developments to be of a high quality.

All development proposals must achieve creative and sustainable design from the outset and throughout the lifetime of the development, which takes into account local character and distinctiveness and ensures all of the following:

- a) Reflects any relevant requirements in the latest South Staffordshire Design Guide SPD, relevant national and local design codes and Conservation Area Management Plans relevant to the site.
- b) Reflects the positive features that make up the character of the local area, enhancing and complementing the site's surroundings.
- c) Incorporates tree lined streets, particularly along primary highway routes through the site.
- d) Positively responds to and respects the existing landform, layout, building orientation, massing and landscaping.
- e) Ensures attractive and distinctive development with use of a variety of materials that will remain attractive through the lifetime of the development, and use bespoke house types to avoid a monotonous visual appearance.
- f) Well-designed buildings to reflect local vernacular, including historical building typologies where appropriate.
- g) Ensures land is used efficiently whilst respecting existing landscape and settlement character
- h) Provides a clear and permeable hierarchy of streets, routes and spaces which incorporate a variety of green infrastructure through the development.
- i) Ensures buildings can be entered, used and exited safely, easily and with dignity by all; are convenient and welcoming with no disabling barriers.
- j) Gives safe and convenient ease of movement to all users prioritising pedestrians and cycle users.
- k) Provides access to local services and facilities via sustainable modes of transport.
- l) Provides a range of house sizes, types and tenures in accordance with Policy HC1.
- m) Delivers socially inclusive, tenure-neutral housing for market and affordable properties where no tenure is disadvantaged, including the surrounding landscaping and public realm, in accordance with Policy HC3 and the Affordable Housing SPD.
- n) Ensures all public and private spaces are easily identifiable.
- o) Ensures that streets and other public spaces are well overlooked, whilst seeking to deliver wider Secure by Design principles, where practicable and consistent with other design objectives.
- p) Accommodates car and cycle parking, and bin storage using imaginative solutions that do not detract from the streetscene.
- q) Delivers a high quality and well-managed public realm that supports biodiversity, recreation, heritage and active travel.
- r) Is proactive and adaptive in responding to social and technological conditions particularly in relation to climate change.
- s) Minimises adverse impact on natural resources and maximise the restoration and enhancement of biodiversity.

HC10: Design requirements

Where infilling is proposed, it will only be permitted where it does not result in the unacceptable intensification of the area and is sensitively integrated into its immediate setting, townscape and landscape and wider settlement pattern.

Developments proposed to come forward along other adjacent or closely related sites with similar delivery timescales must prepare a framework plan to show how a comprehensive and integrated layout could be achieved alongside other sites in the area.

Development proposals should be consistent with other Local Plan policies.

	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
HC10	+	0	0	+	0	0	+	+	0	+	0	0

- J.5.1.1 Effective design requirements can help to ensure new developments are integrated effectively into the local landscape, conserving cultural heritage assets and reinforcing local distinctiveness. Good design can strengthen the sense of place, improve the attractiveness of a location and the quality of life for residents and create a safer place to live and work.
- J.5.1.2 Strategic Policy HC10 could help to reduce carbon emissions associated with development and promote climate change resilience, due to the proposed use of GI which could act as a carbon sink. Therefore, the policy could potentially lead to a minor positive impact on climate change (SA Objective 1).
- J.5.1.3 The policy requires development proposals to *"reflect the positive features that make up the character of the local area, enhancing and complementing the site's surroundings"*. Policy HC10 also seeks to ensure that development proposals use land *"efficiently whilst respecting existing landscape and settlement character"*. This will be likely to result in a minor positive impact on the local landscape, by helping to ensure that future development does not adversely impact the existing landscape character (SA Objective 4).
- J.5.1.4 The policy outlines that future development must *"deliver socially inclusive, tenure-neutral housing for market and affordable properties where no tenure is disadvantaged"*, which is likely to ensure that residents will have the opportunity to find a home which meets their needs. This will therefore be likely to result in a minor positive impact on housing (SA Objective 7).
- J.5.1.5 Under this policy, provisions to *"provide access to local services and facilities"* will likely help to ensure residents have access to local healthcare facilities. As well as this, the policy aims to ensure future developments promote active recreation, and therefore, a minor positive impact on health is identified (SA Objective 8).
- J.5.1.6 Policy HC10 aims for the provision of *"clear... hierarchy of streets, routes and spaces"* to provide *"safe and convenient ease of movement to all users"* and *"provide access to local*

services and facilities’ as well as providing car parking and cycle storage for future developments. This will include improvements to, or the provision of, access to the pedestrian and cycle networks; therefore, this policy will be likely to have a minor positive impact on transport and accessibility in the Plan area (SA Objective 10).

J.5.1.7 The detail provided in the accompanying SPDs could help to enhance the sustainability performance of future development. Design guides such as the National design guide³⁷ could be used to support the development of the SPDs. This is a government endorsed PPG for well-designed places which can be used by local authorities to help guide design codes within the Plan area.

J.5.1.8 The sustainability performance of the policy could be strengthened by specifically referring to the enhancement of cultural heritage assets and their settings, or cross referring to such a policy.

J.5.2 HC11: Protecting amenity

HC11: Protecting amenity

All development proposals should take into account the amenity of any nearby residents, particularly with regard to privacy, security, noise and disturbance, pollution (including light pollution), odours and daylight.

Noise sensitive developments such as housing development will not be permitted in the vicinity of established noise generating uses where potential for harmful noise levels is known to exist unless measures to suppress noise sources can be provided through condition or legal agreement.

Development likely to generate harmful noise levels will be directed to appropriate locations away from known noise sensitive locations and noise sensitive habitats unless measures to suppress noise can be provided for the life of the development through legal agreement.

Sensitive developments such as housing will not be permitted in the vicinity of established sources of pollution which may give rise to harm to the amenity of occupants. Proposals involving the re-use of agricultural buildings to residential use should not take place where agricultural use involving the keeping of animals or associated waste is to be retained in nearby buildings.

Development likely to harm amenity will be directed to appropriate locations away from known sensitive locations or the natural environment.

Development must not unacceptably reduce the existing level of amenity space about buildings, particularly dwellings, and not unacceptably affect the amenity of residents or occupants.

Development proposals should be consistent with other Local Plan policies.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Reference	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment

³⁷ MHCLG (2021) National Design Guide. Available at:

https://assets.publishing.service.gov.uk/media/602cef1d8fa8f5038595091b/National_design_guide.pdf [Date accessed: 02/11/23]

HC11	0	0	0	0	+	0	0	+	0	0	0	0
------	---	---	---	---	---	---	---	---	---	---	---	---

J.5.2.1 Policy HC11 relates to residential privacy, security, noise and disturbance, pollution, odours and daylight. The policy states that “*all development proposals should take into account the amenity of any nearby residents*” and also “*development likely to harm amenity will be directed to appropriate locations away from known sensitive locations or the natural environment*”. Therefore, this policy is likely to have a minor positive impact on pollution, including air, noise and light pollution, as well as on the health and wellbeing of local residents within the Plan area (SA Objectives 5 and 8).

J.5.3 HC12: Space about dwellings and internal space

HC12: Space about dwellings and internal space

The design of new housing should improve the overall quality of development in South Staffordshire, to create a place that people find attractive to live and work in. New development should be designed to take account of individual buildings, their inter-relationships and the character of its surroundings.

Consideration should be given to the layout and design of new housing development, so that a satisfactory standard of spacing around dwellings is achieved, considering outlook, privacy, safety, crime prevention and energy conservation.

Through appropriate design and layout, development proposals must ensure all of the following:

- a) Maximised daylight and sunlight to internal accommodation and private amenity areas. As far as is practicable, habitable room windows, especially lounge windows, should not face north.
- b) Reasonable privacy for dwellings within the layout and protection of the privacy of existing dwellings.
- c) A satisfactory outlook, both within the new development and in relation to the existing development.
- d) A reasonable area of outdoor private amenity space to allow such uses as drying, washing, gardening and children’s play space and with space for garden storage. A reasonable area of communal open space must be provided for flats and specialist housing.

Internal Space and layout

All new residential developments must meet or exceed the Government’s Technical Housing Standards – Nationally Described Space Standard (2015) or subsequent editions.

External Space

All private amenity space should be a minimum of 10 metres in length and the total area of the garden should be a minimum of:

- 45 square metres for dwellings with 2 or less bedrooms;
- 65 square metres for dwellings with 3 and 4 bedrooms;
- 100 square metres for dwellings with 5 or more bedrooms;
- 10 square metres per unit for flats/apartments provided in shared amenity areas.

Flexibility may be applied in relation to the above standard, depending upon the site orientation and the individual merits of the development proposal.

Distances between Dwellings

Dwellings should be designed and sited so as to ensure that all the following are met:

- a) There is a minimum distance of 21 metres between facing principal windows.*

HC12: Space about dwellings and internal space

- b) There is a minimum distance of 14 metres from a principal window when it faces the wall of another dwelling with no principal window.
- c) There is a minimum distance of 10.5 metres from a principal window when the facing wall forms part of a single storey structure.

Flexibility may be applied in relation to the above garden length standard, depending upon the site orientation and the individual merits of the development proposal.

Development proposals should be consistent with other Local Plan policies.

	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
HC12	0	0	0	0	0	0	0	+	0	0	0	0

J.5.3.1 The Nationally Described Space Standards³⁸ help to ensure that all development satisfies the requirement for internal space. It is understood that, in general, the greater the internal space within a property, the better the standard of living for residents.

J.5.3.2 Residents with a larger amount of living space enables an improved standard of living and therefore a more comfortable and higher quality life. Policy HC12 sets out appropriate external space standards for South Staffordshire for new developments and includes standards such as the minimum distance required between dwellings. Residents with more space, and therefore potentially better qualities of life, are likely to be part of a more vibrant and interactive community, and as such, a minor positive impact on the wellbeing of residents is identified (SA Objective 8).

J.5.4 HC13: Parking provision

HC13: Parking provision

The council will require appropriate provision to be made for parking in development proposals in accordance with adopted parking standards. The council’s recommended parking standards are set out in Appendix I. These should be considered the starting point for the level of cycle and car parking required to support a scheme, but in considering the final level of provision the council will have regard to all of the following:

- a) The anticipated demand for parking arising from the use proposed, or other uses to which the development may be put without needing planning permission.
- b) The scope for encouraging alternative means of travel to the development that would reduce the need for on-site car parking. This will be particularly relevant in areas well-served by public transport.

³⁸ MHCLG (2015) Technical housing standards – nationally described space standards. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/524531/160519_Nationally_Described_Space_Standard_Final_Web_version.pdf [Date accessed: 02/11/23]

HC13: Parking provision

- c) The impact on highway safety from potential on-street car parking and the scope for measures to overcome any problems.
- d) The need to make adequate and convenient parking provision for disabled people.
- e) Requirements for electric vehicle charging facilities as set out in Appendix I, including infrastructure to support electric public transport where appropriate.
- f) The design quality of the scheme and the embodied emissions associated with the scheme’s materials and construction.

Any required cycle storage must be safe, weatherproof, convenient and secure to assist in promoting cycle use. In addition to the electric vehicle charging standards, the provision of other emerging vehicular charging technologies (e.g. hydrogen) will also be supported where it can be demonstrated these will support the transition to zero carbon travel.

Development proposals should be consistent with other Local Plan policies.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Reference	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
HC13	+	0	0	0	+	0	0	0	0	+	0	0

J.5.4.1 Policy HC13 relates to parking standards, and aims to introduce electric vehicle charging standards for new residential and commercial development. Electric vehicles are an efficient substitute to petrol- and diesel-powered vehicles, because they have zero direct emissions of some air pollutants including nitrogen oxides and carbon dioxide. Electric vehicles have significantly lower carbon dioxide emissions than conventional petrol and diesel vehicles, even when taking into account the emissions from producing electricity³⁹. By encouraging sustainable transport options and the use of electric vehicles, this policy will be likely to have a minor positive impact on climate change and pollution (SA Objectives 1 and 5).

J.5.4.2 By providing parking standards for future developments, Policy HC13 supports future residents’ accessibility to services and facilities across the Plan area. In determining appropriate car parking provision for new developments, the Council will consider the “*scope for encouraging alternative means of travel*”, which will be anticipated to help encourage the uptake of sustainable transport modes where possible. Overall, the policy is expected have a minor positive impact on transport and accessibility (SA Objective 10).

³⁹ Local Government Association (2021) The case for electric vehicles. Available at: <https://www.local.gov.uk/case-electric-vehicles> [Date accessed: 02/11/23]

J.6 Promoting successful and sustainable communities

J.6.1 HC14: Health infrastructure

HC14: Health infrastructure

Proposals for major residential developments or specialist elderly accommodation must be assessed against the capacity of existing healthcare facilities through engagement with the relevant Integrated Care Board ICB (formally Clinical Commissioning Groups - CCGs). Where it is demonstrated that existing facilities do not have capacity to accommodate patients from new development and that the development will result in an unacceptable impact on these existing local facilities, then a proportionate financial contribution or on-site provision will be sought and agreed through engagement with the ICS. In the first instance, any infrastructure contributions will be sought for expanding the capacity of existing services in the relevant Primary Care Network and secured through planning obligations.

Existing healthcare infrastructure will be protected unless it can be clearly demonstrated that its loss would not have an adverse impact on healthcare delivery, such as where a GP practice is relocating to new premises serving the same community, or where an NHS estate reorganisation programme is needed to ensure the continued delivery of public services and related infrastructure.

New facilities should be well served by public transport infrastructure and good access via legible walking and cycling routes. Where possible, new facilities should be located in local centres. Support will be given for co-location of compatible community services on one site.

Development proposals should be consistent with other Local Plan policies.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
HC14	0	0	0	0	0	0	0	+	0	0	0	0

J.6.1.1 Strategic Policy HC14 aims to ensure that the Plan protects existing healthcare infrastructure (including GP surgeries), that major residential developments are assessed against existing healthcare facilities for potential negative impacts and that contributions towards healthcare infrastructure are prioritised. Therefore, this policy is likely to have a minor positive impact on healthcare by seeking adequate GP services for all current and future residents (SA Objective 8).

J.6.1.2 Many future residents are likely to be situated outside the sustainable target distances from a hospital with an A&E department as all such services are provided from hospitals outside the district; therefore, sustainable access to emergency healthcare may be more limited.

J.6.2 HC15: Education

HC15: Education

Support will be provided for the expansion and/or improvement of educational facilities or the construction of new schools to meet demand generated by children in new development or to deliver necessary improvements and updates to education infrastructure. New education infrastructure will be required from new development in line with the latest Staffordshire Education Infrastructure Contributions Policy, which may include safeguarding of land for future school expansion. Proposals that do not provide contributions towards education infrastructure where it has been determined that these are necessary will be refused.

Existing Infant, Junior, First, Primary, Middle and Secondary school infrastructure will be protected unless a clearly demonstrated that the loss of the facility is supported by a robust business case and will not adversely impact education provision. New facilities should be well served by public transport infrastructure with good access via legible walking and cycling routes. Where feasible the council will aim to co-locate new facilities with local centres and will support the co-location of compatible community facilities with school provision.

Development proposals should be consistent with other Local Plan policies.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Reference	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
HC15	0	0	0	0	0	0	0	0	0	0	+	0

J.6.2.1 Strategic Policy HC15 seeks to protect existing education infrastructure from the pressures of an increasing population. Additionally, the policy requires new education infrastructure from new development to be in line with the latest Staffordshire Education Infrastructure Contributions Policy (SEICP)⁴⁰ which “*provides the basis for calculating likely educational infrastructure contributions*” regarding new development. Therefore, this policy is likely to have a minor positive impact on education within the Plan area.

⁴⁰ Staffordshire County Council (2022) Staffordshire Education Infrastructure Contributions Policy (SEICP). Available at: <https://www.staffordshire.gov.uk/Education/Schoolsandcolleges/PlanningSchoolPlaces/Information-for-developers/Planning-policy.aspx> [Date accessed: 06/11/23]

J.6.3 HC16: South Staffordshire College (Rodbaston)

HC16: South Staffordshire College (Rodbaston)

Within the Special Policy Area defined on the Policies Map, proposals for new development associated with the use of South Staffordshire College (Rodbaston) as an education and training establishment will be supported.

Proposals should demonstrate all of the following:

- a) That the development proposed is for education and training uses directly related to the activities of the College and can include business start up activities to support people into work in areas of employment related to College Curriculum subjects.
- b) That the development is of a scale and massing appropriate to its location.
- c) That the design and external appearance of the development is of a high standard and uses high quality materials which relate well to the development’s setting.
- d) Where appropriate, re-use existing buildings for uses which support the existing uses at South Staffordshire College.
- e) The provision of satisfactory access and vehicle parking.
- f) The incorporation of a satisfactory landscaping scheme, which complements and enhances the development and the local environment.
- g) That the development is located outside Flood Zones 2 and 3.
- h) That the development will not lead to the loss of sports facilities or, if it does, then compensatory provision/investment in sports facilities can be found in a suitable location elsewhere within the college estate. Any replacement sports provision must be equivalent if not better than that being replaced in terms of quality, quantity and accessibility.

Development proposals should be consistent with other Local Plan policies.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Reference	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
HC16	0	0	0	0	0	0	0	0	0	0	+	0

J.6.3.1 Policy HC16 sets out SSDC’s approach with regard to the modernisation and long-term vision of South Staffordshire College, which is likely to improve educational services for people undertaking further and higher courses. Therefore, the policy is likely to have a minor positive impact on education within the Plan area (SA Objective 11).

J.6.4 HC17: Open space

HC17: Open space

Existing open space should not be built on unless the conditions set out in paragraph 103 of the NPPF (or subsequent revisions) are met. This protection extends to all land performing an open space function, including, but is not limited to, all open space identified in the latest Open Space Audit.

HC17: Open space

The Council will require 0.006 hectares of multi-functional publicly accessible open space per dwelling as standard. Development which would generate a need for 0.2ha of open space or more (i.e sites of 33 dwellings or above) should provide this as on-site open space. Smaller areas of incidental green infrastructure without a clear recreational purpose (e.g. landscape buffers, highways verges) and areas without public access will not count towards meeting the quantitative on-site open space standard. Development requiring on-site open space should also include equipped high quality play provision that is accessible to all as a default, unless an alternative play provision strategy is agreed with the council.

On-site open space must be designed and located within development so as to maximise its recreational use and multifunctionality whilst benefiting from natural surveillance. In doing so it should have regard to the wider roles that open space can play in supporting health and wellbeing, sustainable food production, biodiversity, public art, local heritage and climate change mitigation and adaptation. A landscape-led approach should be used to provide a hierarchy of open spaces throughout any development layouts and designs which fail to adopt this approach to on-site open space design will not be supported. Opportunities to connect into existing green infrastructure networks will also be supported in line with Policy HC19. Developers must ensure that appropriate maintenance arrangements are agreed with the council and monitored post completion for any open space provided, having regard to the scale and function of such spaces.

Sites of between and including 10 and 32 dwellings will be required to provide an offsite financial contribution equivalent to the amount of open space that would otherwise be required on-site. This amount will be calculated having regard to both the costs of providing and maintaining off-site multi-functional open space.

Development proposals should be consistent with other Local Plan policies.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Reference	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
HC17	0	0	0	+	0	0	0	+	0	0	0	0

J.6.4.1 Strategic Policy HC17 seeks to protect existing open spaces, and requires new developments to provide or make contributions towards open spaces with a variety of opportunities, including recreation, leisure and play facilities for children. This will help to encourage outdoor exercise and provide space for reflection. Therefore, a minor positive impact on mental and physical health is identified (SA Objective 8).

J.6.4.2 Open spaces can contribute to creating distinctive character in new developments, and link in with wider GI initiatives to contribute towards biodiversity value and help to control surface water runoff in multi-functional spaces. However, the degree to which this policy could contribute to these objectives is not known at this stage and would depend on the content of the future SPD. The policy does however seek to adopt a “*landscape-led approach*” to provide a hierarchy of open spaces and it is likely that this would lead to a minor positive impact on the local landscapes or townscapes.

J.6.5 HC18: Sports facilities and playing pitches

HC18: Sports facilities and playing pitches

There should be no loss of existing facilities or land used for sport, including playing fields, unless:

- a. an assessment has been undertaken which has clearly demonstrated that the land or facilities are surplus to requirement
Or
- b. alternative provision is made of at least equivalent quantity, quality and accessibility to local residents served by the existing facility, particularly by active travel methods, prior to any loss taking place
Or
- c. the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

All new major residential development will make a contribution towards sports facilities and playing pitches which will be secured through a S106 agreement and informed by the latest Sport Facilities and Playing Pitch Strategies.

The development or improvement of new playing fields and sports facilities will be supported in accordance with the latest Sport Facilities and Playing Pitch Strategies.

The council will prepare an Open Space, Sport and Recreation Supplementary Planning Document.

Development proposals should be consistent with other Local Plan policies.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Reference	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
HC18	0	0	0	0	0	0	0	+	0	0	0	0

J.6.5.1 Strategic Policy HC18 aims to protect existing sports facilities and playing pitches and will help to ensure the local facilities are enhanced, which will be likely to result in improvements to current and future residents’ access to these sports services.

J.6.5.2 By encouraging the retention or provision of these community sports facilities to meet local needs, this policy will help to facilitate exercise and recreation for local residents and is expected to have a minor positive impact in relation to health and wellbeing (SA Objective 8).

J.6.6 HC19: Green infrastructure

HC19: Green infrastructure

The council will support the protection, maintenance and enhancement of a network of interconnected, multi-functional and accessible green and blue spaces.

All development proposals should seek to maximise on-site green infrastructure. Where suitable opportunities exist, taking into account local circumstances and priorities, development must demonstrate it has sought to strengthen and promote connectivity with the existing green infrastructure network by:

HC19: Green infrastructure

- Providing interlinked multifunctional publicly accessible open space within new development schemes including public open spaces, attractive cycle and walkways, street trees, green roofs and walls, pocket parks, allotments, play areas and new wetland habitats.
- Identifying and strengthening potential linkages with green and blue spaces within adjoining developed areas to promote interconnected urban green infrastructure.
- Connecting together and enriching biodiversity and wildlife habitats.
- Strengthening green linkages between settlements and the wider countryside and major areas of open space such as country parks.

Development proposals must make adequate provision for the long term management and maintenance of the green infrastructure network.

Development proposals should be consistent with other Local Plan policies.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Reference	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
HC19	+	+	+	+	+	0	0	+	0	0	0	0

J.6.6.1 Paragraph 20 of the NPPF⁴¹ states that "*Strategic policies should set out an overall strategy for the pattern, scale and design quality of places (to ensure outcomes support beauty and placemaking), and make sufficient provision for ... conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation*".

J.6.6.2 Green Infrastructure (GI) contributes considerably towards high quality natural and built environments. GI is a multi-functional feature and has multiple benefits that include helping to mitigate extreme temperatures and flooding; habitat protection and creation; pollution reduction; and providing open land for recreation and breathing space to benefit residents' physical and mental health.

J.6.6.3 Policy HC19 aims to provide GI opportunities throughout the Plan area which will result in various benefits including increased uptake of CO₂; reduced water runoff rates and therefore both fluvial and surface water flooding; provide and improve connectivity between habitats; provide opportunities to retain and improve the character and appearance of the local landscape and townscape; filtration of pollutants such as those produced by road transport; and have a positive impact on residents' physical and mental wellbeing by providing increased access to natural habitats. Therefore, a minor positive impact on climate change mitigation and adaptation (SA Objectives 1 and 2), biodiversity

⁴¹ DLUHC (2023) National Planning Policy Framework, December 2023. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 22/12/23]

(SA Objective 3), local landscape (SA Objective 4), pollution (SA Objective 5) and residents' health and wellbeing (SA Objective 8) will be likely.

J.7 Building a strong local economy

J.7.1 EC1: Sustainable economic growth

EC1: Sustainable economic growth

The council, working in partnership with businesses, Staffordshire County Council, the Staffordshire and Stoke Local Enterprise Partnership and other key stakeholders, will support measures to sustain and develop the local economy of South Staffordshire and encourage opportunities for inward investment and further economic development of the district. Inward investment that accords with the spatial strategy in potential growth sectors such as advanced manufacturing will be supported, along with business growth that supports decarbonisation and the district's journey to net zero.

Through the existing supply of available employment land and allocations in this plan the council will ensure there is sufficient supply of employment land to meet the needs of the district over the plan period, as well as contributing towards the employment needs of our wider functional economic market area arising from the Black Country authorities.

Live/work units and proposals that support home working that reduce commuting journeys will be supported, subject to complying with other development plan policies.

Employment proposals should be accessible via sustainable travel modes, including clear and legible walking and cycling routes. Employment proposals will only be supported where the necessary on and off-site infrastructure is provided, including the necessary highways mitigation measures.

Where B8 use logistics/warehousing is proposed, the council will support proposals to deliver adequate overnight HGV parking to deliver economic growth. It will also support proposals for new or expanded HGV parking in a manner consistent with the latest Freight Strategy for Staffordshire.

Preference will be given to the use of sustainable previously developed land for employment development having regard to factors such as biodiversity and sustainable transport links.

Economic growth will be primarily focused on the district's six strategic employment sites:

- Four Ashes
- Hilton Cross
- i54 South Staffordshire
- M6, Junction 13
- ROF Featherstone
- West Midlands Interchange

There will be strong in principle support for employment development within the development boundaries of these sites that is in line with their allocation and/or substantive planning permission and that result in significant job creation. At i54 (including the i54 western extension) only proposals that fall within use classes E(g) and B2 will be supported. Development at the strategic employment sites should be of high quality and facilitate the creation/enhancement of multifunctional green spaces and the enhancement of the Green Infrastructure Network.

There is also support for employment development within existing employment areas and within the Tier 1 and Tier 2 villages identified within the settlement hierarchy subject to other policy requirements including ensuring proposals do not have an unacceptable impact on local amenity.

Elsewhere in the district diversification of the rural economy will be supported in line with Policy EC4, particularly where proposals would contribute towards climate change mitigation and other environmental benefits where compatible with other planning policies.

	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
EC1	+	+	+/-	+/-	+/-	+	0	+	+/-	+	0	++

- J.7.1.1 Strategic Policy EC1 aims to meet the identified requirements for employment land within South Staffordshire over the Plan period. This will be likely to have a major positive impact on the local economy (SA Objective 12). The policy supports the delivery of employment development at the existing strategic employment sites. Development of employment sites in Tier 1 and Tier 2 villages is also supported, subject to meeting the requirements of other LPR policies.
- J.7.1.2 The sustainability assessment of this range of employment sites and projects could identify a range of sustainability impacts in regard to SA Objectives 3, 4, 5 and 9, and therefore, for the purposes of this policy assessment the overall impact on these objectives is uncertain.
- J.7.1.3 By giving preference to the “*use of previously developed land ... having regard to factors such as biodiversity*”, the policy could potentially help to prevent the loss of soil resources and promote the use of existing buildings, resulting in an efficient use of land. Therefore, this policy is likely to have a minor positive impact on natural resources (SA Objective 6).
- J.7.1.4 The policy states that “*employment proposals should be accessible via sustainable travel modes, including clear and legible walking and cycling routes*”, which may allow for current and future residents to be able to better access employment opportunities, and therefore, a minor positive impact on accessibility (SA Objective 10) is identified.
- J.7.1.5 The promotion of walking and cycling access routes as well as the “*creation/enhancement of multifunctional green spaces and the enhancement of the Green Infrastructure Network*” which could result in various benefits. Active travel to and from a place of employment will promote a healthy lifestyle, and the use of greenspaces is likely to improve the physical and mental health of employees; therefore, a minor positive impact on health (SA Objective 8) can be expected. The use of GI in the employment areas could contribute to pollution reduction and help to mitigate local flooding and therefore is likely to have a minor positive impact on climate change mitigation and adaptation (SA Objectives 1 and 2).

J.7.2 EC2: Retention of employment sites

EC2: Retention of employment sites

Development that would result in the loss of an existing designated employment area (as defined on the policies maps) in whole or part; or a site/premises which is currently, or was last, used for industrial or commercial purposes (classes E(g), B2, B8 or related sui generis) will not be permitted unless it can be demonstrated that:

- a) The retention of the site or premises for use classes E(g), B2 or B8 use has been fully explored without success. Proposed development that would see the loss of sites or premises should be subject to a period of marketing, with detailed evidence of the marketing undertaken submitted with the planning application. The length and extent of the marketing should be proportionate to the sites or premises importance to the local economy and should typically be for a minimum 12 month period on terms that reflect the lawful use and condition of the premises

OR

- b) The redevelopment would result in significant economic benefits to the area, for example by facilitating the relocation of a business to a more appropriate site in the district.

Proposals for alternative uses must not prejudice the continued operation and viability of existing or allocated employment areas and any other neighbouring uses.

If an existing employment use in a designated employment area is considered to be unviable and the applicant is seeking a change of use to an alternative employment use class, then a period of marketing must be evidenced with the planning application.

There is a strong presumption that the strategic employment sites at i54 South Staffordshire; Hilton Cross, ROF Featherstone, Four Ashes and West Midlands Interchange are retained for employment use and used for employment purposes that accord with their allocation and/or substantive planning permissions and their strategic planning and economic objectives.

Development proposals should be consistent with other Local Plan policies.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Reference	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
EC2	0	0	0	0	0	0	0	0	0	0	0	+

- J.7.2.1 Strategic Policy EC2 seeks to protect existing employment sites from loss which will help to protect the identified land needed for employment in the Plan area. The policy sets out those circumstances where redevelopment may be permitted. The policy is therefore likely to have a minor positive impact on the local economy and employment (SA Objective 12).

J.7.3 EC3: Employment and skills

EC3: Employment and skills

An Employment and Skills Plan (ESP) will be required for developments of 100 or more residential units or 5000sqm of commercial floorspace. For commercial developments of less than 5000sqm down to 1000sqm, applicants are required to undertake early discussions with the Council’s Enterprise Team to determine if an ESP is required, informed by the number of jobs the development will support.

The ESP should outline exactly what the development will provide in terms of employment and training opportunities to local residents. This will be secured by a legal agreement or planning condition.

The Plan must clearly outline how the developer will deliver the ESP in cooperation with the local authority. This will include reference to specific and measurable outputs, key delivery partners and details on the timeframe within which each output will be delivered.

Development proposals should be consistent with other Local Plan policies.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Reference	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
EC3	+	0	0	0	0	0	0	0	0	+	0	+

J.7.3.1 Policy EC3 sets out the requirement for large residential and commercial developments to submit an Employment and Skills Plan (ESP) which will be likely to encourage engagement of local people within employment and training. This will be likely to help address skills gaps and bring new talent into local businesses; therefore, the policy could consequently have a minor positive impact on the economy and employment within the Plan area (SA Objective 12). The policy seeks to encourage more local employment opportunities and encourage more sustainable commuting patterns, potentially having a minor positive effect on climate change mitigation (SA Objective 1) and transport and accessibility (SA Objective 10).

J.7.4 EC4: Rural economy

EC4: Rural economy

1. Rural employment within villages

To support sustainable economic growth in rural areas proposals that create new employment generating uses or support the sustainable growth and expansion of existing businesses within village development boundaries as defined in this plan will be supported in principle where the scale of development would be in-keeping with the tier and scale of the village and be in character and scale with the location.

2. Rural employment outside development boundaries

Rural employment proposals for employment development in locations outside development boundaries will only be supported where all of the following criteria are satisfied:

- a) It is small in scale.

EC4: Rural economy

- b) It comprises the conversion and reuse of rural buildings.
- c) The development is not capable of being located within the development boundaries of a village, by reason of the operation of the absence of suitable sites.
- d) It is supported by an appropriate business case which demonstrates that the proposal will support the local economy, which in turn would help sustain rural communities. Additional guidance on the nature of the business case requirements will be provided through a Rural Development SPD.
- e) The development is accessible by a choice of means of transport including walking, cycling and public transport.
- f) The local highway network is capable of accommodating the traffic generated by the proposed development.

3. Conversion and re-use of rural agricultural buildings

The sustainable re-use of rural agricultural buildings will be supported with the preference for re-use for rural employment uses. Proposals for non-employment generating uses will only be supported where it can be demonstrated through marketing at a realistic price for at least 12 months, and on terms reflecting the condition of the premises, that an appropriate employment use is not viable. The loss of employment uses in rural areas will need to conform to Policy EC2.

Proposals for the conversion and re-use of rural agricultural buildings must demonstrate all of the following:

- a) That the building is structurally sound and in a condition capable of conversion without demolition and rebuilding, or substantial reconstruction.
- b) That the building is no longer needed for the overall agricultural activity of the farm holding.
- c) That the building is capable of conversion without detrimental alterations affecting its character, appearance, significance, general setting and immediate surroundings.
- d) High quality design and use of materials that respect the rural character and local distinctiveness of the area.

4. Farm Diversification

Farm diversification such as those that support the engagement of communities with land management, rural crafts and the development of local produce markets will be supported in principle provided that all of the following criteria are met:

- a) The development will not cause significant or unacceptable harm to the character and appearance of the landscape and avoids the loss of large areas of higher quality agricultural land.
- b) There is no adverse impact upon amenity or the historic environment. Historic farmsteads must be appropriately and sensitively re-used where appropriate, whilst ensuring the form, scale and layout of the site respects the historic farmstead and its relationship with the surrounding landscape within which it is situated.
- c) The proposals contribute positively to the maintenance of biodiversity, climate change and food security.
- d) The proposal makes use of existing buildings wherever possible. Where new or replacement buildings are required they should be closely related to the existing group and their siting, form, scale, design and external materials should be in harmony with existing traditional buildings.
- e) The proposal forms part of a comprehensive diversification scheme and is operated as a subsidiary to a sustainable farming business or appropriate land-based enterprise and will contribute to making the existing business viable.
- f) The approach roads and access to the site have the capacity to cater for the type and levels of traffic likely to be generated by the development.
- g) The proposal will benefit the local rural economy.

EC4: Rural economy

Proposals which generate high levels of traffic or increased public use will only be permitted where they can be easily accessed by public transport, foot and cycle modes.

Development proposals should be consistent with other local plan policies.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
EC4	0	0	0	+	0	+	0	0	0	0	0	+

J.7.4.1 South Staffordshire is a rural district, and this policy sets out the circumstances where rural diversification and employment-generating uses will be supported. Overall, Strategic Policy EC4 is expected to have a minor positive impact on the local economy (SA Objective 12) by encouraging the provision of rural employment opportunities.

J.7.4.2 Additionally, by primarily restricting development of rural employment to using existing buildings, a minor positive impact on local natural resources (SA Objective 6) could be achieved, as valuable local soils are less likely to be lost through the development. The policy will help to ensure that the “siting, form, design and external materials” for replacement buildings are carefully considered to ensure new development conserves and enhances the local character. Furthermore, the policy states that development proposals should “contribute positively to the maintenance of biodiversity, climate change and food security”. Overall, the policy has the potential to lead to a minor positive impact on the landscape character (SA Objective 4) and a negligible impact on climate change mitigation, adaptation and biodiversity (SA Objectives 1, 2 and 3).

J.7.5 EC5: Tourist accommodation

EC5: Tourist accommodation

Proposals for tourist accommodation within development boundaries will be supported subject to compliance with other policies within this plan. Proposals should be proportionate, relative to the size of the settlement.

Proposals for small scale or expansion of tourist accommodation outside of development boundaries, will be permitted provided that all the following criteria are met:

- a) The demand for the development has been clearly demonstrated.
- b) The proposal is connected to and associated with existing facilities or located at a site that relates well to defined settlements in the area and are accessible to adequate public transport, cycling and walking links.
- c) The proposal would not materially adversely affect the character, appearance and amenity of the surrounding area, any heritage assets and their setting and include appropriate mitigation where necessary to ensure this.
- d) Where applicable, proposals should conserve and, where possible, enhance the significance of heritage assets, including their setting

EC5: Tourist accommodation

- e) Appropriate, convenient and safe vehicular access can be gained to/from the public highway and appropriate parking is provided.
- f) The proposal would not use the best and most versatile agricultural land.
- g) The development will be served by adequate water, sewerage and waste storage and disposal systems.
- h) The proposal includes a high-quality landscaping scheme.

In addition, tourist accommodation proposals will be required to include a business plan that will demonstrate the long-term viability of the scheme.

Proposals for large scale standalone tourist accommodation outside of development boundaries will not normally be supported.

The occupation of new tourist accommodation will be restricted via condition or legal agreement to ensure a tourist use solely and not permanent residential occupation.

The change of use from tourist accommodation to residential will not normally be permitted unless it is demonstrated that its continued use as tourist accommodation is no longer viable.

Development proposals should be consistent with other Local Plan policies.

	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
EC5	0	0	0	+	0	0	0	+	+	+	0	+

J.7.5.1 Policy EC5 will be likely to enhance the tourism potential of South Staffordshire and could help to result in an increase in the number of visitors to the Plan area. Increased tourism is expected to have benefits in relation to the local economy, providing employment opportunities and improving local infrastructure. This will be likely to have a minor positive impact on the economy (SA Objective 12). An increase in employment opportunities and a strong local economy will also be likely to have a minor positive impact on the wellbeing of local residents (SA Objective 8).

J.7.5.2 The policy sets out requirements for proposed developments to be connected to existing facilities which are accessible to public transport, cycling and walking networks. Policy EC5 also requires that *"appropriate, convenient and safe vehicular access can be gained to/from the public highway and appropriate parking is provided"*. The policy will be likely to enhance transport and accessibility (SA Objective 10), having a minor positive impact in and around areas developed for tourism in South Staffordshire.

J.7.5.3 Policy EC5 states that proposals for small scale or expansion of tourist accommodation and facilities outside of development boundaries *"will include a high-quality landscaping scheme"*. As such, this policy could potentially have minor positive impacts on landscape and townscape (SA Objective 4).

J.7.5.4 Policy EC5 states that proposals for small scale or expansion of tourist accommodation and facilities outside of development boundaries “*should conserve and, where possible, enhance the significance of heritage assets, including their setting*”. The policy could potentially have a minor positive impact on the historic environment (SA Objective 9).

J.7.6 EC6: Rural workers dwellings

EC6: Rural workers dwellings

1. Proposals for new rural workers dwellings

New isolated dwellings in the countryside intended for occupation by rural workers will not be permitted unless it can be shown that there is an essential need for a rural worker to live permanently at or near their place of work within the countryside. If a new dwelling is essential to support a new farming activity, whether on a newly-created agricultural unit or an established one, it should be a temporary dwelling for the first three years. New rural workers dwellings will only be supported where all of the following criteria are met:

- a) There is a clearly established existing functional need.
- b) The need relates to a full-time worker, or one who is primarily employed in rural employment and does not relate to a part-time requirement.
- c) The unit and the rural employment activity concerned have been established for at least three years, have been financially sound for at least one of them, are currently financially sound, and have a clear prospect of remaining so.
- d) The functional need could not be fulfilled by another existing dwelling on the unit, or any other existing accommodation in the area which is suitable for occupation by the workers concerned or by converting existing redundant buildings on site.
- e) Other planning requirements, e.g. in relation to access, or the impact on the countryside are satisfied.

An assessment setting out the need for the dwelling should be submitted with any application which will be verified by an independent expert.

2. Removal of Conditions

Where agricultural or forestry dwellings are permitted, appropriate conditions will be used to retain the dwelling for rural worker occupation. Applications to remove these conditions will not be permitted unless:

- a) The dwelling is no longer needed on that unit for the purposes of agriculture or forestry.
- b) There is no current demand for dwellings for rural workers in the locality.
- c) The dwelling cannot be sold or let at a price which reflects its occupancy condition within a reasonable period.

Development proposals should be consistent with other Local Plan policies.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Reference	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
EC6	0	0	0	+	0	0	+	0	0	0	0	+

- J.7.6.1 Policy EC6 relates to housing agricultural workers and equine developments and highlights the requirement for essential need to be demonstrated in relation to rural workers' dwellings in order for them to be permitted in the countryside.
- J.7.6.2 Paragraph 84 of the NPPF⁴² states that "*planning policies and decisions should avoid the development of isolated homes in the countryside unless ... there is an essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside*". Applicants would need to prove the need for permanent or temporary dwellings and be able to satisfy the criteria set out within the policy.
- J.7.6.3 This policy will help to ensure that rural workers live near the worked land, are able to live in a location that permits access into their place of work, and thereby support the rural economy at an appropriate level. Therefore, this policy is expected to have a minor positive impact on housing provision and the economy (SA Objectives 7 and 12). The policy will restrict development outside that required for these purposes, and therefore, could serve to protect landscape character (SA Objective 4).

J.7.7 EC7: Equine related development

EC7: Equine related development

Horse related facilities and equine enterprises in the Green Belt and Open Countryside will be supported provided that all of the following criteria are met:

- a) New buildings in association with equine development such as stables and field shelters are sited within close proximity to any existing rural buildings or settlement pattern to reduce the impact on the local landscape.
- b) The scale, design and external materials should be sympathetic to the rural character of the area in which the building(s) are situated.
- c) The number of stables should be proportionate to the reasonable equestrian leisure needs of the applicant balanced against the need to protect the countryside and character of the landscape whilst according with The British Horse Standards.
- d) The proposal does not have an adverse impact on the natural environment and the integrity of designated protected sites.
- e) Any associated developments such as menages are sympathetic to the character of the area.
- f) The proposal is located close to the bridleway network and is located so as to reduce conflict between road users due to the transportation of horses, deliveries and horses using narrow lanes.

Proposals for larger scale equine enterprises will be considered on whether they will be beneficial to the local rural economy through a business case demonstrating sound financial planning and should be consistent with other local planning policies.

Development proposals should be consistent with other Local Plan policies.

⁴² DLUHC (2023) National Planning Policy Framework, December 2023. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 22/12/23]

	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
EC7	0	0	0	0	0	0	0	+	0	0	0	+

J.7.7.1 Policy EC7 supports the development of equine related development within the Plan area. This policy could potentially have benefits by providing increased opportunities for leisure and recreation, boosting the rural economy and providing employment opportunities. Therefore, this policy could potentially result in a minor positive impact in regard to health and wellbeing (SA Objective 8) and economic development (SA Objective 12).

J.8 Community services, facilities and infrastructure

J.8.1 EC8: Retail

EC8: Retail

Proposals will maintain and enhance the vitality and viability of South Staffordshire’s network of centres in line with national policy, taking into account any local regeneration strategies where appropriate as well as the requirements of this policy and other settlement specific policies/guidance. This includes proposals being accessible by a choice of means of transport including walking, cycling and public transport.

The council will seek to support and deliver public realm enhancement schemes, parking provision, highways measures and sustainable transport infrastructure as defined in the Infrastructure Delivery Plan.

Proposals should be appropriate in scale and type to the role of centres, respect their (historic) character, environment, and local distinctiveness. Proposed uses will make a demonstrable positive contribution to the overall role and functionality of the centre by maintaining/enhancing the centre’s retail, cultural and/or community offer.

Proposals should be of a high-quality design and accord with the design policies of this plan alongside any design SPDs and the NPPF.

Development proposals must accord with all other relevant plan policies.

Designated Centres

The council will designate, protect, and where possible enhance, a network of centres consisting of Large Village Centres, Village Centres, and Neighbourhood Centres. The Retail Centres Hierarchy, or network of centres for South Staffordshire is set out below. The boundary of each designated centre has been produced within the Local Plan Policies Map. These boundaries will be kept under review.

EC8: Retail

	Centre	Location
Large Village Centres	Codsall	The Square, Station Road
	Penkridge	Market Street
	Wombourne	High Street
Village Centres	Brewood	Market Place
	Codsall	Birches Bridge
	Coven	Brewood Road
	Cheslyn Hay	High Street
	Great Wyrley	Quinton Court
	Kinver	High Street
	Pattingham	The Square
	Perton	Anders Square
Neighbourhood Centres	Billbrook	Duck Lane, Billbrook Road, Lane Green Road
	Cheslyn Hay	Glenthorne Drive
	Essington	Hill Street
	Featherstone	The Avenue
	Great Wyrley	Tower View Road
	Great Wyrley	Walsall Road North
	Great Wyrley	Walsall Road South
	Huntington	Stafford Road
	Kinver	Potters Cross
	Penkridge	Boscomoor Shopping Centre
	Shareshill	Church Road
	Swindon	High Street
	Wheaton Aston	High Street
	Wombourne	Bull Lane
	Wombourne - Blakeley	Common Road, Giggetty Lane
Wombourne	Planks Lane	

There is a presumption in favour of accommodating E class uses and other Main Town Centre uses within the Large Village Centres. Such uses will be supported as complementary offers in Village Centres where their function is to primarily to serve the village and in Neighbourhood Centres where their function is to primarily serve the day-to-day needs of immediate local residents.

A small quantity of retail provision is to be delivered on each of the SUEs as described in Policies SA1 and SA2 to support the existing Retail Centres Hierarchy. Each of which will be reviewed for inclusion on the Retail Centres Hierarchy as part of the next Local Plan review process.

Other Town Centre Uses

Proposals that reduce the concentration of E-class uses within a centre will not be supported, unless it is demonstrated that it supports wider significant regeneration of the centre and does not impose undue dominance of non-Main Town Centre uses. Consideration will be had to the number, proximity and continuance of other non-E class uses, and the compatibility of the proposal with nearby uses.

Proposals for other uses, including residential, will be assessed on a case-by-case basis, subject to the creation/preservation of a satisfactory residential environment and ensuring the functionality of the centre is not undermined.

Residential uses will not be permitted at ground floor level (except for the provision of access arrangements). Changes to residential use on the first floor or above will be supported as long as they do not compromise the ability of the ground floor unit to operate either as existing or by making future retail accommodation impractical. For example, consideration will be given to loss of storage space, preparation areas and delivery areas.

Proposals for hot food takeaways are expected to:

- a) not result in significant harm to the amenity of nearby residents or highways safety; and
- b) not result in harmful cumulative impacts due to the location of existing or consented proposed outlets.

EC8: Retail

Out-of-Centre Proposals

The council will not permit proposals in edge-of, or out-of-centre locations for retail and other Main Town Centre uses unless they satisfy the sequential test and impact assessment. This includes proposals for the expansion of existing uses and applications to vary existing conditions.

A sequential test will be required for new Main Town Centre uses outside of a designated centre in line with national policy and guidance.

An impact assessment will be required for all retail uses that exceed the following **net** floorspace thresholds both in, edge-of, and out-of-centre:

- Convenience floorspace – 500m².
- Comparison floorspace - 300m².

The impact assessment must be prepared in line with national policy and guidance.

Catchment areas for both sequential tests and impact assessments will be considered on a case-by-case basis to reflect the application/site specific circumstances under consideration.

Development proposals should be consistent with other Local Plan policies.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Reference	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
EC8	+	0	0	0	0	0	0	0	0	+	0	+

J.8.1.1 Strategic Policy EC8 seeks to protect the vitality of existing village centres. The policy sets out the hierarchy of centres within South Staffordshire including Large Village Centres, Village Centres and Neighbourhood Centres.

J.8.1.2 This policy aims to support and strengthen the identified hierarchy of centres which will help to provide benefits within the community such as residential access to local services and facilities, in addition to strengthening the local economy by protecting retail opportunities. The policy supports residential development in town centres where it ensures that “*the functionality of the centre is not undermined*”. Therefore, this policy is expected to have a minor positive impact on the local economy (SA Objective 12) and a minor positive impact on residents’ access to local services (SA Objective 10). The policy seeks to protect existing facilities and services to reduce the need to travel, potentially having a minor positive effect on climate change mitigation (SA Objective 1).

J.8.2 EC9: Protecting community services and facilities

EC9: Protecting community services and facilities

The council will support the development and retention of local services and community facilities to meet local needs and to promote social wellbeing, interests, interaction, and healthy inclusive communities. Development proposals that would result in the loss of uses, buildings or land for community services and facilities will only be supported where both of the following criteria can be clearly demonstrated:

- a) Appropriate alternative existing provision will remain of at least equivalent quality and accessibility to local residents served by the existing facility, particularly by active travel methods.
- b) The use is no longer viable and is incapable of being made viable or adapted to retain a viable service or facility including as a community run enterprise. A marketing exercise for a minimum of 12 months at a realistic price will be required to demonstrate that the use or premises is unviable. This includes marketing the premises for an alternative community service and facility uses.

Development for the relocation of community services and facilities will only be permitted where alternative provision is made of at least equivalent quality and accessibility to local residents served by the existing facility, particularly by active travel methods, prior to the loss of the existing facility.

Development proposals should be consistent with other Local Plan policies.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Reference	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
EC9	+	0	0	0	0	0	0	+	0	+	0	+

J.8.2.1 Strategic Policy EC9 supports the provision and enhancement of essential communities and facilities within the Plan area, including small local shops and pubs, and aims to retain existing services.

J.8.2.2 This policy is expected to have a minor positive impact on the local economy and the wellbeing of local residents (SA Objectives 8 and 12), by retaining access to services close to where people live. The policy also seeks to protect existing facilities and services to reduce the need to travel, potentially having a minor positive effect on climate change mitigation (SA Objective 1).

J.8.3 EC10: Wolverhampton Halfpenny Green Airport

EC10: Wolverhampton Halfpenny Green Airport

The council supports the role of Wolverhampton Halfpenny Green Airport as a General Aviation airport.

Development proposals, including the replacement of existing outdated buildings and high-quality infill development directly related to the General Aviation role of the airport and situated within the developed area of the site (as defined on the policies map) will be supported. New development unrelated to this role will not be supported.

EC10: Wolverhampton Halfpenny Green Airport

The council will support the continued occupation of the site by existing non-aviation businesses that play an important role in ensuring the viability of the airport.

The council will resist development proposals that would have a detrimental impact on the environment and the amenity of nearby residents including the physical expansion of the site, extensions to runways and the operation of commercial passenger and freight services. Development proposals relating to the existing uses required for safe and efficient operation of the airport will be supported.

Development proposals should be consistent with other Local Plan policies.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Reference	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
EC10	0	0	0	0	0	0	0	0	0	0	0	+

J.8.3.1 Policy EC10 supports development proposals for Wolverhampton Halfpenny Green Airport, provided they remain within the developed area of the site. Wolverhampton Airport provides a base for aircraft and helicopter flying schools, private aircraft operators, commercial operators, aviation and non-aviation related businesses⁴³. The policy is likely to have a minor positive impact on the local economy and employment (SA Objective 12) within the Plan area, by maintaining the role of the airport. There are no plans to support further expansion of the airport or to allow jet engine aircraft use. The policy is likely to have a negligible effect on climate change mitigation (SA Objective 1) and other SA Objectives.

J.8.4 EC11: Infrastructure

EC11: Infrastructure

Planning permission will only be granted for proposals that have made suitable arrangements for the improvement or provision of infrastructure necessary to make the scheme acceptable in planning terms.

The council will work with infrastructure providers, agencies, organisations and funding bodies to enable, support and co-ordinate the delivery of infrastructure to support the delivery of the growth identified within this Plan.

Developers and landowners must work positively with the council, neighbouring authorities and other infrastructure providers throughout the planning process to ensure that the cumulative impact of development is considered and then mitigated, at the appropriate time, in line with their published policies and guidance.

New development will be required to deliver or contribute towards the timely provision of essential supporting infrastructure either directly as part of the development, or through an appropriate financial contribution.

The infrastructure requirements for the strategic sites allocated within this Plan will be set out via their corresponding policies, master planning process and IDP.

⁴³ Wolverhampton Halfpenny Green Airport. Available at: <https://www.wolverhamptonairport.co.uk/> [Date accessed: 28/11/23]

EC11: Infrastructure

Development proposals should be consistent with other Local Plan policies.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Reference	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
EC11	0	0	+	0	0	0	0	+	0	+	+	0

- J.8.4.1 Strategic Policy EC11 seeks to ensure the Plan provides appropriate and proportionate infrastructure to deliver the proposed development. South Staffordshire’s Infrastructure Delivery Plan⁴⁴ defines infrastructure as “*a broad term to define all the requirements that are needed to make places function efficiently and effectively. Infrastructure can range from large physical infrastructure such as roads and utilities; social infrastructure like health, educational and cultural programs, projects, networks and facilities; through to Green Infrastructure such as open spaces and allotments*”.
- J.8.4.2 This policy will help to ensure that there are adequate services for all new development in the area and could potentially improve the type and range of services available to current and future residents.
- J.8.4.3 The policy will likely have a minor positive impact on biodiversity, residents’ health and wellbeing, transport and accessibility to local amenities, and education (SA Objectives 3, 8, 10 and 11), supporting policies for infrastructure requirements set out within the South Staffordshire Infrastructure Delivery Plan⁴⁵.

J.8.5 EC12: Sustainable transport

EC12: Sustainable transport

The council will work proactively with partners to promote sustainable transport measures and deliver high quality transport infrastructure and links across the district. This includes opportunities to improve bus and rail services and connections including making provision from increased demand from new development within the district.

The Local authority will work with Staffordshire County Council to prepare a Local Walking & Cycling Infrastructure Plan to identify strategic opportunities for walking and cycling improvements throughout the district.

⁴⁴ South Staffordshire Council (2022) Infrastructure Delivery Plan. Available at: https://www.sstaffs.gov.uk/sites/default/files/2023-02/04_idp_november_2022.pdf [Date accessed: 02/11/23]

⁴⁵ ibid

EC12: Sustainable transport

Developers of major developments or where a proposal is likely to have significant transport implications will be required to demonstrate they have maximised opportunities for sustainable travel and will make adequate provision to mitigate the likely impacts through provision of a Transport Assessment and Travel Plan. All other developments will be required to submit a Transport Statement where appropriate.

All new developments will be required to demonstrate all of the following:

- a) Designed to maximise opportunities for walking, cycling and the use of public transport, ensure the safe movement of vehicles and minimise the impact of parked and moving vehicles on residents, business and the environment. Developments should adhere to the standards set out within LTN 120 or subsequent additions.
- b) Safe access and an acceptable degree of impact on the local highway network.
- c) Provision of safe, direct routes within permeable layouts that facilitate and encourage short distance trips by walking and cycling between home and nearby centres of attraction, and to bus stops or railway stations, to provide real travel choice for some or all of the journey. Travel routes should link into existing travel networks beyond the development site where possible. The long-term management of the public realm including transport infrastructure must be ensured.
- d) Protection of existing rights of way, cycling and equestrian routes (including both designated and non-designated routes and, where there is evidence of regular public usage, informal provision). If it is demonstrated that the loss of such as route is unavoidable, the development should provide suitable, more appealing or at least equal replacement routes.
- e) Adequate provision to mitigate the likely impacts (including cumulative impacts) of their proposal including environmental impacts (such as noise and pollution) and impact on amenity and health. This will be achieved through direct improvements and Section 106 contributions.

Development proposals should be consistent with other Local Plan policies.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
EC12	+	0	0	0	+	0	0	+	0	++	+	+

J.8.5.1 Strategic Policy EC12 seeks to promote sustainable transport throughout the Plan area through a range of measures including strengthening bus and rail services and their connections, and encouraging walking and cycling. Through these measures, this policy will be likely to increase opportunities for residents to make sustainable transport choices, leading to a major positive impact on transport and accessibility (SA Objective 10).

J.8.5.2 By supporting the improvement of transport and accessibility across the Plan area, this policy will help to improve residents' access to services and facilities, including healthcare, leisure and schools. In addition, this policy aims to "*maximise opportunities for walking, cycling and use of public transport*" and "*encourage short distance trips*" to nearby centres via active travel. Overall, this policy will be likely to have positive impacts on human health and education (SA Objectives 8 and 11).

J.8.5.3 The transport schemes set out within the policy will be likely to have a positive impact on the economic prosperity of the Plan area and will likely ensure that there will be a variety of sustainable transport choices. The policy seeks to improve sustainable transport and may lead to an improvement in access to employment opportunities, therefore, the policy will be likely to have a minor positive impact on the local economy (SA Objective 12).

J.8.5.4 By encouraging sustainable transport options and protecting public rights of way, cycling and equestrian routes, this policy will be likely to have a minor positive impact on climate change and pollution (SA Objectives 1 and 5).

J.8.6 EC13: Broadband

EC13: Broadband

New developments in South Staffordshire District must provide gigabit-capable connectivity through the developer installing full fibre connectivity. If this is not achievable, it must be demonstrated as such through a connectivity statement, in which case the next best alternative technology should be applied. As a minimum the developer should be required to provide appropriate ducting within the highway to facilitate a provider delivering a service at a later date.

Support will be given to proposals which involve community groups or organisations seeking to improve broadband infrastructure within their area.

Development proposals should be consistent with other Local Plan policies.

	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
EC13	+	0	0	0	0	0	0	0	0	+	+	+

J.8.6.1 Policy EC13 supports the provision of broadband connectivity and networks as part of new development proposals, in order to meet the needs of current and future populations.

J.8.6.2 With improvements to broadband and communications in the area under this policy, residents will be likely to have greater access to essential services from home, which will provide increased opportunities for education and working from home, resulting in improved access to a wider range of employment opportunities. Therefore, the policy has potential to result in a minor positive impact on education and the local economy (SA Objectives 11 and 12).

J.8.6.3 In addition, with improved access to online facilities and home working, this policy could potentially help to reduce reliance on private car use such as for commuting to workplaces, and in turn, reduce local congestion. This could potentially lead to a minor positive impact on climate change, due to reduced emissions associated with less traffic, and transport (SA Objectives 1 and 10).

J.9 Protecting and enhancing the natural environment

J.9.1 NB1: Protecting, enhancing and expanding natural assets

NB1: Protecting, enhancing and expanding natural assets

Support will be given for proposals which protect and enhance the quality of the natural environment. The restoration, enhancement and creation of habitats and ecological connectivity will be supported, particularly where these contribute to the Local Nature Recovery Strategy, the Nature Recovery Network and the conservation of species and habitats of principal importance, as well as those listed on the Staffordshire Biodiversity Action Plan.

When determining planning applications, the council will apply the principles relevant to habitats and species protection as set out in national legislation and policy. Development proposals which are likely to affect any designated site or habitat, species or geological feature must be supported by adequate information to ensure that the impact of the proposal can be fully assessed.

National Site Network (SACs and SPAs) and Ramsar sites

Where a proposed development is likely to have an adverse impact on a site that forms part of the National Sites Network or Ramsar site (either alone or in-combination with other plans or projects), permissions will not be granted unless there is due compliance with the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended). Where likely significant adverse effects are identified, measures must be put in place to avoid or, if this is not possible, mitigate those impacts. Significant adverse impacts that cannot be avoided or adequately mitigated will not be permitted except where there are imperative reasons of overriding public interest. It is the responsibility of the applicant to provide the Local Planning Authority with sufficient information to progress a Habitat Regulations Assessment.

Nationally Designated Sites (SSSI and NNR)

Development proposals which directly or indirectly cause harm to sites of national importance (whether individually or in combination with other developments) will not be permitted. The only exception is where satisfactory mitigation or compensation is provided, and the benefits of the proposed development clearly outweigh both the likely impacts on the features of the site that make it of national importance and any impacts on the wider national network of sites.

Locally Designated Sites (SBIs and LNRs)

Local sites will be safeguarded from development through the use of the mitigation hierarchy with avoidance as the preferred approach. Where impact is unavoidable, developers must provide mitigation or, as a last resort, compensation in the form of replacement habitat in a suitable location to ensure there is a net gain of biodiversity and that the coherence and resilience of any local ecological network is maintained.

Sites that lie outside of a formal designation but which meet the criteria for designation, whether that be statutory or non-statutory site designation, will be afforded the same protection as if it were to be designated, and applications affecting such sites must assess the site against the Local Wildlife Site Assessment Criteria.

The loss or deterioration of irreplaceable habitats including ancient woodland and ancient or veteran trees will not be acceptable unless there are wholly exceptional reasons, and a suitable compensation strategy is agreed. Areas of very high, high or medium habitat distinctiveness identified in the District's Nature Recovery Network Mapping (or subsequent survey work) and as detailed on the Secretary of State's biodiversity metric should be avoided in the first instance.

Valued soils will be protected and enhanced, including the best and most versatile agricultural land, and development should not contribute to unacceptable levels of soil pollution.

NB1: Protecting, enhancing and expanding natural assets

Where there is a confirmed presence or reasonable likelihood of legally protected species, species of principal importance, or species of local conservation concern (i.e. Birds of Conservation Concern, species on the Staffordshire rare plant register, species on the edge of its range, red data book species etc.) and a reasonable likelihood of the protected species being affected, the developer will be required to undertake appropriate ecological surveys prior to determination.

Where impacts to the species are likely, the developer must demonstrate compliance with the mitigation hierarchy by first avoiding, then mitigating and finally compensating for any adverse effects. All mitigation and/or compensation measures must be detailed in ecological reports submitted with the application.

The developer must demonstrate through submission of documents that where a protected species mitigation license is required from Natural England, that Natural England would be reasonably likely to grant this, and that the three tests under Regulation 55 sub-paragraphs (2)(e-g), and (9)(a-b) of the Conservation of Habitats and Species Regulations 2017 (as amended) would be met.

Further guidance will be provided in the Natural Environment and Biodiversity SPD.

Development proposals should be consistent with other Local Plan policies.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Reference	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
NB1	+	+	++	+	+	+	0	+	0	0	0	0

J.9.1.1 Strategic Policy NB1 will support proposals which conserve and enhance designated and non-statutory biodiversity sites, determining those that could have an adverse impact on European or nationally designated sites in accordance with relevant statutory and national policy.

J.9.1.2 It is expected that this policy will allow the protection and enhancement of locally designated habitats and areas of high habitat distinctiveness, as well as promote habitat connectivity and nature recovery. Habitat connectivity improves the ability of species to adapt to climate change through movement in response to changing environmental conditions. Therefore, it is anticipated that this policy will have a major positive impact on biodiversity within the Plan area (SA Objective 3).

J.9.1.3 Nationally and locally designated biodiversity assets relevant to South Staffordshire include Motte Meadows SAC and NNR, Cannock Chase SAC (located adjacent to the district border) and various SSSIs and SBIs. Non-designated biodiversity assets, such as hedgerows, arable field boundaries and mature trees, are common key features of local landscapes within South Staffordshire. By conserving and possibly enhancing biodiversity assets, it is expected that some key landscape features will also be protected and enhanced. Therefore, this policy will be likely to have a minor positive impact on the local landscape (SA Objective 4).

J.9.1.4 Vegetation provides several ecosystem services, including carbon storage (climate change mitigation), flood risk reduction (climate change adaptation), filtration of air pollutants and

the protection of ecologically valuable soil resources from erosion. The protection and enhancement of biodiversity features provided by this policy will be likely to help protect and enhance these essential ecosystem services within the Plan area. Policy NB1 could potentially result in a minor positive impact on climate change mitigation and adaptation, pollution and natural resources (SA Objectives 1, 2, 5 and 6).

- J.9.1.5 The protection of local biodiversity assets could also be expected to have positive impacts in relation to human health. Access to a diverse range of natural habitats is recognised as having benefits for mental wellbeing and could potentially encourage residents to engage in a more active lifestyle. This policy will therefore be likely to have a minor positive impact on human health (SA Objective 8).

J.9.2 NB2: Biodiversity

NB2: Biodiversity

All new developments must consider biodiversity as part of any proposal, and professional ecological reports must be provided where impacts to biodiversity are anticipated. Development must demonstrate how the mitigation hierarchy has been applied to the application by first avoiding impacts, then mitigating impacts which cannot be avoided, and finally by providing proportionate compensation where impacts cannot be avoided or mitigated.

The form and design of development must consider how positive outcomes for biodiversity can be achieved through the creation and/or enhancement of native habitats to maintain and enhance ecological connectivity. The built environment should be viewed as an opportunity to fully integrate biodiversity within new development through innovation. Features including green walls and roofs and sustainable urban drainage systems designed for biodiversity will be supported on new developments where appropriate.

Previously developed land (brownfield sites) will not be considered to be vacant of biodiversity. The reuse of such sites must be undertaken carefully with regard to existing features of biodiversity interest. Development proposals on such sites will be expected to include measures that maintain and enhance important features and appropriately incorporate them within any development of the site.

All new development must also include measures to assist with halting the decline of species and to address biodiversity loss by including site-specific enhancements for species such as bat and bird boxes, hedgehog highways, planting of native floral species, features beneficial for invertebrates (sand banks, bee bricks, log piles) and other beneficial measures.

Biodiversity net-gain

All new development must provide a minimum of 10% biodiversity net gain, measured using the Secretary of State's biodiversity metric or other metric as required for the purposes of measuring biodiversity net gain in the Environment Act 2021. Proposals must meet all of the following criteria:

- a) Delivery of the biodiversity net-gain on-site wherever possible, in a manner consistent with national requirements, ensuring that existing habitats on site are maintained and enhanced as a priority. Where it is demonstrated that this cannot be achieved on site, the required level of off-site biodiversity net-gain must be provided, prioritising biodiversity units in close proximity to the site, unless doing otherwise would better align with the objectives of the Local Nature Recovery Strategy. As a last resort, statutory biodiversity credits may be acceptable.
- b) Measurement against the latest Natural England Biodiversity Metric. Measurement of biodiversity net gain must be demonstrated through the submission of the Secretary of State's biodiversity metric, or other metrics as may be required by subsequent legislative amendments.

NB2: Biodiversity

- c) Securing of the habitat in perpetuity. Where it is demonstrated that this is not possible, the habitat must be secured for at least 30 years. This will be achieved via a S106 agreement or planning conditions.

Where new habitats are created the council will seek opportunities for habitat creation that mitigates the effect of climate change on species, enhances links between habitats and facilitates the movement of species through the landscape.

Consideration must be given to the aims and objectives of the Local Nature Recovery Strategy, and to addressing the decline of both species and habitats.

Further guidance will be provided in the Natural Environment and Biodiversity SPD.

Development proposals should be consistent with other Local Plan policies.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Reference	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
NB2	+	0	++	0	0	0	0	0	0	0	0	0

J.9.2.1 Strategic Policy NB2 seeks to ensure that all new development provides a “*minimum of 10% biodiversity net gain as part of the development*” calculated using the Defra metric and sets out requirements to achieve this.

J.9.2.2 This policy is likely to have a positive impact on local biodiversity, as development which could potentially result in the loss of local biodiversity and geodiversity will be prevented and site-specific enhancements for certain species will be required. Furthermore, biodiversity net gain will be required for all new developments, with a minimum 10% increase required for all new development in accordance with statutory requirements, preferably delivered close to sites where on-site gain is proved to be unviable and with regard to the Local Nature Recovery Strategy. Therefore, a major positive impact on local biodiversity and geodiversity is identified (SA Objective 3).

J.9.2.3 The policy sets out that opportunities for the creation of habitat that “*mitigates the effect of climate change on species*” will be sought, which could increase the capture of GHGs within the Plan area and have a minor positive impact on climate change mitigation (SA Objective 1).

J.9.3 NB3: Cannock Chase SAC

NB3: Cannock Chase SAC

Development will only be permitted where it can be demonstrated that the proposal will have no adverse effect upon the integrity of the Cannock Chase Special Area of Conservation (SAC) either alone or in combination with other plans or projects. In addition to any other likely significant effects identified, all development that leads to a net increase in dwellings within the Zone of Influence around Cannock Chase SAC

NB3: Cannock Chase SAC

has the potential to have an adverse impact upon Cannock Chase SAC and must mitigate for such effects. Mitigation can be secured through developer contributions as outlined in the Guidance to Mitigation Note.

The effective avoidance of, and/or mitigation for, any identified adverse effects on the Cannock Chase SAC must be demonstrated to the council as the Competent Authority and Natural England and secured prior to the council giving approval for development. This policy has jurisdiction over developments within South Staffordshire only; however, it will be implemented jointly with neighbouring authorities via the application of complementary policies in partner Local Plans.

Development proposals should be consistent with other Local Plan policies.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Reference	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
NB3	0	0	+	0	+	0	0	+	0	0	0	0

J.9.3.1 Strategic Policy NB3 supports development proposals which *"will have no adverse effect upon the integrity of the Cannock Chase Special Area of Conservation (SAC)"*. Cannock Chase SAC is a Habitats site designated for its important heathland habitats. This policy seeks to protect the SAC from potential adverse effects of development, such as increases in recreational disturbance and changes in air quality. Therefore, this policy is likely to have a minor positive impact on the biodiversity of the SAC, by considering these development related threats and pressures and ensuring they are mitigated effectively (SA Objective 3).

J.9.3.2 The policy includes the *"avoidance of and/or mitigation for any identified adverse impacts effects"* on the SAC which could have a minor positive impact on pollution and health through the potential reduction of air pollutants (SA Objectives 5 and 8).

J.9.4 NB4: Landscape character

NB4: Landscape character

The intrinsic rural character and local distinctiveness of the South Staffordshire landscape should be maintained and where possible enhanced. Throughout the district, the design and location of new development should take account of the characteristics and sensitivity of the landscape and its surroundings, and not have a detrimental effect on the immediate environment and on any important medium and long-distance views. Proposals must consider the County Council Landscape Character Assessment and Historic Landscape Characterisation in assessing their impacts upon landscape character and should also (where applicable) have regard to the findings of the latest Landscape Sensitivity Study prepared by the council.

All trees, woodland, and hedgerows should be protected and retained. Where any loss of these assets is demonstrably necessary or would facilitate increased biodiversity appropriate mitigation must be delivered by the applicant and appropriate maintenance arrangements established. New and replacement planting should seek to maximise biodiversity in a manner that complements the habitats within and character of the surrounding area.

NB4: Landscape character

Proposals within the Historic Landscape Areas (HLA) defined on the Policies Map should have special regard to the desirability of conserving and enhancing the historic landscape character, important landscape features and the setting of the HLA.

All proposals within the Cannock Chase Area of Outstanding Natural Beauty (AONB) and its setting must conserve and enhance the landscape and scenic beauty of the area. In assessing proposals within the AONB or its setting regard must be had to the Cannock Chase AONB Design Guide 2020 and Cannock Chase AONB Views and Setting Guide 2020, or subsequent updates of these documents. Proposals that contribute to the objectives of the Cannock Chase AONB Management Plan, the Forest of Mercia and other local initiatives that will contribute to enhancing landscape character will be supported.

Development proposals should be consistent with other Local Plan policies.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Reference	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
NB4	0	0	+	++	0	0	0	0	+	0	0	0

J.9.4.1 Strategic Policy NB4 seeks to ensure that future development proposals do not result in adverse impacts on landscape character and sets out how proposals can integrate with and enhance the surrounding landscape. The policy also sets out the requirement to conserve and enhance Cannock Chase AONB and its setting, in accordance with the NPPF and additional guidance including the Cannock Chase AONB Design Guide and the AONB Management Plan. The policy includes the protection and retention of all trees, woodland and hedgerows.

J.9.4.2 As this policy will be likely to protect and enhance local landscape features (potentially including on-site trees and hedgerows) and the overall landscape character of the area, a major positive impact on the landscape (SA Objective 4) and a minor positive impact on biodiversity (SA Objective 3) are anticipated. Additionally, the key characteristics of some landscapes within South Staffordshire emphasise built heritage. By protecting and enhancing these key characteristics, this policy is expected to have a minor positive impact on the historic environment (SA Objective 9).

J.10 Climate change and sustainable development

J.10.1 NB5: Renewable and low carbon energy generation

NB5: Renewable and low carbon energy generation

The development of renewable or sustainable energy technologies and complementary infrastructure will be supported throughout the district, subject to conformity with other local plan policies. Such technologies include solar, wind, district heating, hydroelectricity, ground source heat and complementary battery storage schemes. In considering the impacts of a scheme the cumulative impact of the proposed development will be considered along with other planned, committed or completed development.

In addition to conformity with other local plan policies, solar energy proposals and associated infrastructure must also demonstrate that:

- a) The use of agricultural land is necessary and no alternative available and suitable previously developed site within the district can accommodate a scheme of similar scale. The area of search considered should have regard to a viable connection (in distance) to the National Grid;
- b) If (a) is satisfied but the scheme is on Best and Most Versatile Agricultural Land, that there are no alternative sites on lower grade agricultural land that could accommodate the scheme; and
- c) That the proposal has considered opportunities for continued agricultural use (where feasible) and will maximise biodiversity benefits around arrays.

In the case of wind energy proposals, the whole of the district is designated as an area of search suitable for wind energy development. In addition to conformity with other local plan policies, wind proposals must also demonstrate that:

- a) The development does not create a potential hazard to the public, including users of highways, footpaths, bridleways or other public rights of way.
- b) The development does not interfere with telecommunication paths or air traffic services including those associated with the military.
- c) They do not have an overshadowing or overbearing effect on nearby residents.
- d) The development avoids or adequately mitigates shadow, flicker, noise and any other adverse impact on amenity.
- e) Following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed.

Within the district's Green Belt, elements of many renewable energy schemes may comprise inappropriate development and in all such cases schemes must demonstrate very special circumstances in order to be granted permission. Benefits of schemes relevant in considering whether very special circumstances exist may include (but are not limited to) the wider environmental benefits associated with increased production of energy from renewable sources.

Development proposals should be consistent with other Local Plan policies.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Reference	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
NB5	+	0	-	-	+/-	+/-	0	0	0	0	0	0

J.10.1.1 Strategic Policy NB5 seeks to support renewable and low carbon energy generation within South Staffordshire, including solar, biomass schemes and onshore wind.

J.10.1.2 The promotion of renewable or low carbon technologies within the Plan area will help to decrease reliance on energy that is generated from unsustainable sources, such as fossil fuels. A reduction in the use of fossil fuels will help to reduce the volume of GHGs that are emitted into the atmosphere. This in turn will reduce South Staffordshire’s contribution towards the causes of climate change. This policy will be likely to have a positive impact on climate change through delivery of renewable and low carbon energy (SA Objective 1). The number of schemes and energy generated from them is uncertain at this stage, however, a minor positive effect is possible.

J.10.1.3 The development of renewable and low carbon technologies could lead to a reduction in the emission of some pollutants; however, some schemes, such as biomass energy generation, may result in increases in air pollutants. At this stage, the impact on air quality within the Plan area is uncertain (SA Objective 5).

J.10.1.4 The policy sets out the approach to renewable energy development in the Green Belt, which may be justified in certain circumstances. This could result in a loss of previously undeveloped land, and subsequently result in the loss of natural habitats and ecologically and agriculturally important soils. The nature of the proposals is uncertain at this stage but there may be opportunities to deliver environmental protection/enhancements alongside development. For example, some solar farm development can also accommodate biodiverse grassland or meadows beneath the panels. However, some wind turbine development can lead to adverse effects on some species such as birds and bats due to collisions. Therefore, there is an uncertain effect on natural resources (SA Objectives 6) and potentially adverse effects on biodiversity (SA Objective 3).

J.10.1.5 The potential design of future renewable energy developments is unknown at this stage of the plan-making process; however, the development of solar farms or wind turbines has the potential to have minor negative impacts on the local landscape (SA Objective 4) and would need to be informed by bespoke assessments.

J.10.2 NB6A: Net zero new build residential development (operational energy)

NB6A: Net zero new build residential development (operational energy)

A1. Overarching carbon reduction

NB6A: Net zero new build residential development (operational energy)

New residential development of 1 or more homes shall achieve **net zero regulated and unregulated carbon emissions**, through the application of requirements A2 – A4 laid out below.

Regulated carbon emissions should be calculated with **SAP10.2 or any more recent replacement methodology**.

The **regulated carbon reduction should be achieved through on-site measures**, unless this is demonstrated to the Council's satisfaction that it is unviable or unfeasible with reference to site-specific factors.

A2. Energy efficiency

A 63% reduction on the Part L 2021 TER (regulated carbon emissions), is to be achieved through energy efficiency features.

Alternatively, where Passivhaus certification is proposed (or a space heat demand of $\leq 20\text{kWh/m}^2/\text{year}$ and a total energy use intensity of $\leq 45\text{kWh/m}^2/\text{year}$) and the proposal is fossil fuel free, the applicant will not need to submit SAP calculations. In that case the applicant's Energy Statement should instead cite their PHPP calculations, and a condition will be set requiring evidence of fulfilment on completion.

A3. Renewable energy supply

Subsequent to point A2, a **further reduction to net zero regulated carbon emissions is to be achieved through on-site renewable energy generation** and/or connection to a certified renewable or low-carbon (fossil-free) local energy network.

Where it is proven unfeasible or unviable to include enough on-site renewable energy to achieve a 100% reduction in TER in this way, and this can be demonstrated to the Council's satisfaction with reference to site-specific factors, the applicant will first demonstrate inclusion of as much renewable energy as feasible and viable, then address the remaining regulated carbon emissions by offsetting as per point A4.

Large-scale development (50 residential units or more) should demonstrate that opportunities for on-site renewable energy infrastructure (on-site but not on or attached to individual dwellings), such as solar PV canopies on car parks, have been explored.

Proposals are encouraged to demonstrate that the amount of on-site renewable energy generation equates to $\geq 120\text{ kWh/m}^2$ projected building footprint/year.

A4. Offsetting

Only in exceptional circumstances and as a last resort where it is demonstrably unfeasible to achieve the requirements of A3 above, any residual carbon emissions from regulated and unregulated energy are to be offset via a **Section 106 financial contribution reflecting 30 years of the building's operation**.

A5. Reduced performance gap

Applicants are encouraged to submit, alongside their SAP figures, a set of total energy performance predictive calculations using Passivhaus Planning Package (PHPP), CIBSE TM54, or other method demonstrably proven to produce accurate predictions of total in-use energy.

An assured performance method must be implemented throughout all phases of construction to ensure operational energy in practice performs to predicted levels at the design stage.

A6. Smart energy systems

Proposals should demonstrate how they have considered the difference (in scale and time) of renewable energy generation and the on-site energy demand, with a view to maximising on-site consumption of energy generated on site and minimising the need for wider grid infrastructure reinforcement.

Where the on-site renewable energy generation peak is not expected to coincide with sufficient energy demand, resulting in a need to export or waste significant amounts of energy, proposals should demonstrate how they have explored scope for (and where appropriate implemented) energy storage and/or smart distribution systems.

NB6A: Net zero new build residential development (operational energy)

A7. Post-occupancy evaluation

Large-scale development (over 50 homes) should monitor and report total energy use and renewable energy generation values on an annual basis for 5 years from first occupation. An outline plan for the implementation of this should be submitted with the application. Monitored data are to be reported to the local planning authority.

Development proposals should be consistent with other Local Plan policies.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Reference	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
NB6A	++	0	0	0	+	0	0	0	0	0	0	0

J.10.2.1 Strategic Policy NB6A seeks to achieve high energy efficiency and net zero carbon within all residential developments of one or more homes through requiring a 63% reduction in carbon emissions compared to the baseline rate, as set out in Part L of the Building Regulations.

J.10.2.2 This policy encourages climate change mitigation and will be likely to help reduce GHG emissions associated with development throughout South Staffordshire, due to the promotion of energy efficient design and provision for the use of on or near-site renewable technologies. A major positive impact is identified for Climate Change Mitigation (SA Objective 1).

J.10.2.3 Policy NB6A will help to ensure developers have considered opportunities for incorporating on-site renewable energy schemes, such as solar panels, and energy efficiency features such as Passivhaus standards. Both could help to reduce emissions of some air pollutants, with a potential minor positive impact on SA Objective 5.

J.10.3 NB6B: New build non-residential development (operational energy)

NB6B: New build non-residential development (operational energy)

B1. BREEAM

Major non-residential development is to **demonstrate compliance with the most recent applicable BREEAM Excellent standard**. BREEAM Outstanding should be targeted and the proposal will be afforded weight in favour where this is achieved.

Maximum credits under BREEAM criteria Ene01 should be achieved.

B2. Energy efficiency

New non-residential development proposals are expected to achieve a **15% improvement in Part L 2021 TER through energy efficiency features** unless demonstrated unfeasible or unviable to the satisfaction of the Council with references to site-specific and/or use-class specific characteristics. Where this target is not met, applications must demonstrate that energy efficiency measures (and TER reductions from these) have

NB6B: New build non-residential development (operational energy)

been pursued to the greatest extent feasible and viable, in comparison to the notional standards set by Building Regulations Part L. This is to be demonstrated using the latest non-residential National Calculation Methodology (currently SBEM).

Additionally, proposals are **encouraged** to meet the following targets:

- Warehouses: ≤ 35 kWh/m²/year total energy use
- Offices: ≤ 55 kWh/m²/year total energy use
- Schools: ≤ 55 kWh/m²/year total energy use
- Retail: ≤ 35 kWh/m²/year total energy use
- Other building types: 30 kWh/m²/year regulated energy uses
- All typologies: Space heat demand: ≤ 15 kWh/m²/year.

Where accurate energy modelling (PHPP, CIBSE TM54 or equivalent subject to Council approval) demonstrates that the proposal will achieve the relevant one of the above optional targets or Passivhaus certification, this benefit will be afforded weight in favour of the proposal and it will not be necessary to also submit evidence of the 15% TER reduction cited above.

B3. On-site renewable energy

Non-residential development must **demonstrate the fullest feasible and viable use of on-site renewable energy generation and/or connection** to local renewable and low carbon energy network, with the aim to annually match operational energy use.

All non-residential buildings are **encouraged** to demonstrate that the amount of on-site renewable energy generation equates to ≥ 120 kWh/m² projected building footprint/year. Where this is fulfilled, the sustainability benefit of this will be recognised and afforded weight in favour of the proposal. Large-scale development (5000m² non-residential floorspace or more) should demonstrate that opportunities for on-site renewable energy infrastructure (on-site but not on or attached to individual buildings), such as solar PV canopies on car parks, have been explored.

In new developments, the use of fossil fuels and connection to the gas grid will not be considered acceptable.

B4. Reduced performance gap

Proposals are encouraged to take the following steps, and planning decisions will recognise the sustainability benefits where these are demonstrated to have been fulfilled:

- Produce accurate energy use predictions using Passivhaus Planning Package, CIBSE TM54, or other method demonstrably proven to produce accurate predictions of total in-use energy (subject to local authority approval of the method).
- Implement an assured performance process throughout design and construction to ensure operational energy in practice performs to predicted levels at the design stage.

B5. Smart energy systems

Proposals should demonstrate how they have considered the difference (in scale and time) of renewable energy generation and the on-site energy demand, with a view to maximising on-site consumption of energy generated on site and minimising the need for wider grid infrastructure reinforcement.

Where the on-site renewable energy generation peak is not expected to coincide with sufficient energy demand, resulting in a need to export or waste significant amounts of energy, proposals should demonstrate how they have explored scope for (and where appropriate implemented) energy storage and/or smart distribution systems.

B6. Post-occupancy evaluation

Large-scale development (5,000m² floor space or more) should monitor and report total energy use and renewable energy generation values on an annual basis for 5 years from first occupation. An outline plan for

NB6B: New build non-residential development (operational energy)

the implementation of this should be submitted with the application. Monitored data are to be reported to the local planning authority.

Development proposals should be consistent with other Local Plan policies.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Reference	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
NB6B	++	0	0	0	+	0	0	0	0	0	0	0

J.10.3.1 Strategic Policy NB6B seeks to achieve high energy efficiency and sustainable design within non-residential developments through the target for a 15% improvement in energy efficiency compared to the baseline rate, as set out in Part L of the Building Regulations, and demonstrate compliance with the most recent applicable BREEAM Excellent standard. This policy will be likely to help reduce GHG emissions associated with non-residential development throughout South Staffordshire, due to the promotion of energy efficient design and requiring incorporation of on-site renewable energy technologies. The policy also encourages developers to seek opportunities for “*smart energy systems*” including energy storage and distribution, with potential wider benefits to the efficiency of energy infrastructure networks across the Plan area. Overall, a major positive impact is identified for Climate Change Mitigation (SA Objective 1).

J.10.3.2 Policy NB6B will help to ensure developers have considered opportunities for incorporating on-site renewable energy schemes, such as solar panels, and will not permit use of fossil fuels or connection to the gas grid for new large-scale developments. On-site renewable energy schemes could help to reduce emissions of some air pollutants, with a potential minor positive impact on SA Objective 5.

J.10.4 NB6C: Embodied carbon and waste

NB6C: Embodied carbon and waste

C1. Embodied carbon reporting

All new residential and non-residential developments are encouraged to complete a whole-life carbon assessment in accordance with RICS Whole Life Carbon Assessment guidance.

C2. Limiting embodied carbon

Large-scale new residential (50 and above units) and non-residential (5000m2 commercial floorspace) development to limit embodied carbon (RICS modules A1 – A5) to 550 kgCO2/m2 GIA.

C3. Building end-of-life

All new buildings are to be designed to enable easy material re-use and disassembly, subsequently reducing the need for end-of-life demolition.

C4. Demolition audits

NB6C: Embodied carbon and waste

All major development that contains existing buildings/structures to carry out a pre-redevelopment and/or pre-demolition audit, following a well-established industry best practice method (e.g. BRE).

Development proposals should be consistent with other Local Plan policies.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Reference	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
NB6C	++	0	0	0	+	+	0	0	0	0	0	0

J.10.4.1 Strategic Policy NB6C seeks to minimise waste and ensure that carbon emissions from development are accounted for at all stages of development, aiding the borough’s climate change objectives.

J.10.4.2 The policy will ensure that development proposals regard embodied carbon and that proposals which meet certain size thresholds must undertake Whole Life Carbon Assessments and demonstrate plans on reducing life-cycle carbon emissions. Whole Life Carbon Assessments can provide a true picture of a building’s carbon impact on the environment and includes the capture of carbon emissions from the construction and use of the building over its entire life, including the demolition and disposal of a building⁴⁶. Undertaking Whole Life Carbon Assessments ensure that emissions from the built environment are accounted for and additionally encourages local sourcing of materials, resulting in better use of natural resources and can minimise emissions produced from the transportation of materials. Therefore, a major positive impact on climate change is identified (SA Objective 1), as well as potential minor positive impacts on reducing waste (SA Objective 5) and facilitating efficient use of natural resources (SA Objective 6).

J.10.5 NB7: Managing flood risk, sustainable urban drainage systems & water quality

NB7: Managing flood risk, sustainable urban drainage systems & water quality

1. Managing flood risk

New development shall be located on Flood Zone 1 or areas with the lowest probability of flooding, taking climate change into account, and will not increase flood risk elsewhere. Any proposals for new development (except water compatible uses) within Flood Zones 2 and 3 will be required to provide sufficient evidence for the Council to assess whether the requirements of the sequential test and exception test have been satisfied, taking climate change into account. Where development meets the sequential test in an area of higher flood

⁴⁶ Greater London Authority (2022) Whole Life-Cycle Carbon Assessments. Available at: <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments-guidance> [Date accessed: 01/02/24]

NB7: Managing flood risk, sustainable urban drainage systems & water quality

risk, it must be designed to be flood resilient and safe for its users for the lifetime of the development, taking climate change and the vulnerability of any residents or users into account.

For developments within Flood Zones 2 and 3, and for developments elsewhere involving sites of 1ha or more, development proposals must be accompanied by a site-specific Flood Risk Assessment which meets the requirements of the NPPF and Planning Practice Guidance. Flood Risk Assessments submitted must take into account an assessment of flood risk across the life of the development taking climate change into account in accordance with the latest Environment Agency guidance.

All more Vulnerable and Highly Vulnerable development within Flood Zone 2 and 3 should set finished floor levels 600mm above the known or modelled at 1% and 3.3% annual exceedance probability (AEP) flood level, including an allowance for climate change in accordance with the latest National guidance. All new developments in Flood Zones 2 and 3 should not adversely affect food routing or result in a net loss of flood storage capacity that would increase flood risk elsewhere.

For developments located in areas at risk of fluvial flooding, safe access/egress must be provided in the form of a safe dry route for people as a minimum and vehicles wherever possible.

Developments should, where possible naturalise urban watercourses (by reinstating a natural, sinuous river channel and restoring the functional floodplain) and open up underground culverts, to provide biodiversity net gain as well as amenity improvements. Development should not take place over or within 8m of culverted watercourses.

Where it is not always possible to direct development to sites with the lowest probability of flooding, the development should seek to minimise risk to the site and make the development resistant to any residual risk and make the development flood resilient. Opportunities should also be sought to reduce the overall level of flood risk through the layout and form of development. Development should be designed to be safe throughout its lifetime, taking account of the potential impacts of climate change. Provision for emergency access and egress must also be included.

All developments should seek to provide wider betterment by demonstrating in site-specific flood risk assessments and surface water drainage strategies (where required) what measures can be put in place to contribute to a reduction in overall flood risk downstream. This may be by provision of additional storage on site e.g. through oversized SuDS, natural flood management techniques, green infrastructure and green-blue corridors and / or by providing a partnership funding contribution towards wider community schemes. The developer should consult with the relevant authority at the earliest opportunity

For all developments (excluding minor developments and change of use) proposed in Flood Zone 2 or 3, a Flood Warning and Evacuation Plan should be prepared.

Where the development site would benefit from the construction of Flood Management Infrastructure such as Flood Alleviation Schemes, appropriate financial contributions will be sought.

2. Sustainable urban drainage systems (SuDS)

All new major development or developments involving large areas of hard standing (e.g. car parks) will incorporate Sustainable urban Drainage Systems (SuDS) appropriate to the nature of the site. Such systems shall provide optimum water runoff rates and volumes taking into account relevant local or national standards and the impact of the Water Framework Directive on flood risk issues, unless it can be clearly demonstrated that they are impracticable.

Sustainable drainage systems will be expected to reflect the design requirements and drainage hierarchy set out in the Staffordshire County Council Sustainable Drainage Systems (SuDS) Handbook - February 2017, or subsequent updates.

SuDS design should be an integral part of the design and clear details of proposed SuDS together with how they will be managed and maintained will be required as part of any planning application.

Only proposals which clearly demonstrate that a satisfactory SuDs layout with appropriate maintenance is possible, or compelling justification as to why SuDs should not be incorporated into a scheme, or are unviable,

NB7: Managing flood risk, sustainable urban drainage systems & water quality

are likely to be successful. SuDs systems should be designed to ensure that it can be accessed for maintenance and operation requirements and that ongoing maintenance costs are economically proportionate.

The dual use of land for Sustainable Urban Drainage and Open Space can be supported where neither use is compromised by the other. It may be supported in circumstances where land is safely usable by the public as open space and where SuDs will contribute towards an attractive and well landscaped environment where use as open space does not compromise the efficient and effective functioning of the SuDs in the short or longer term.

Discharge should not be made into the combined sewer system and early engagement by the developer with Severn Trent Water Ltd will be required to ensure sustainably drained development.

3. Water quality

Development should not adversely affect the quality or quantity of water, either directly through pollution of surface or ground water or indirectly through the treatments of wastewater.

In order to protect and enhance water quality, all development proposals must demonstrate all of the following:

- a) There are adequate water supply, sewerage and land drainage systems (including water sources, water and wastewater infrastructure) to serve the whole development, or an agreement with the relevant service provider to ensure the provision of the necessary infrastructure prior to the occupation of the development. Where development is being phased, each phase must demonstrate sufficient water supply and wastewater conveyance, treatment and discharge capacity.
- b) The quality of ground, surface or water bodies will not be harmed, and opportunities have been explored and taken for improvements to water quality, including denaturalisation of river morphology, and ecology.
- c) Appropriate consideration is given to sources of pollution, and appropriate Sustainable Drainage Systems (SuDS) measures incorporated to protect water quality from polluted surface water runoff.

Foul drainage to a public sewer should be provided wherever possible, but where it is demonstrated that it is not feasible, alternative facilities must not pose unacceptable risk to water quality or quantity.

Development proposals should be consistent with other Local Plan policies.

	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
NB7	0	++	+	0	+	0	0	0	0	0	0	0

J.10.5.1 Strategic Policy NB7 seeks to manage the risk of flooding throughout the Plan area and ensure that measures are put in place within new developments to promote resilience to flooding. The policy sets out various criteria for certain development proposals to meet, such as the requirement for sufficient evidence that sequential and exception tests have been satisfied for all development located within Flood Zones 2 and 3. These, and other requirements as set out in the policy including requirements for sustainable urban drainage systems (SuDS), will help to ensure that all future development proposals do not locate new residents in areas at risk of flooding or exacerbate flood risk in areas surrounding the

development. Therefore, a major positive impact on climate change adaption is identified (SA Objective 2).

- J.10.5.2 Additionally, Policy NB7 requires developments to naturalise urban watercourses and open up culverts with the aim to “*provide biodiversity net gain as well as amenity improvements*”. The policy is therefore expected to have a minor positive impact on watercourses and the wildlife they support (SA Objective 3).
- J.10.5.3 This policy also states that “*development should not adversely affect the quality or quantity of water, either directly through pollution of surface or ground water or indirectly through the treatments of wastewater*” and therefore is likely to enhance protection of surface and/or groundwater, potentially leading to a minor positive impact on water pollution within South Staffordshire (SA Objective 5).

J.11 Enhancing the historic environment

J.11.1 NB8: Protection and enhancement of the historic environment and heritage assets

NB8: Protection and enhancement of the historic environment and heritage assets

The historic environment will be conserved and enhanced, and heritage assets will be protected in a manner appropriate to their significance. Development proposals should demonstrate how they conserve or enhance the character, appearance and function of heritage assets and their settings and respect the significance of the historic environment.

Development proposals should seek to avoid, and then minimise harm to heritage assets in the first instance. Development proposals which would cause harm to the significance of a heritage asset, or its setting, will not be permitted without a clear justification in accordance with legislation and national policy.

Proposals which could impact on the significance of a heritage asset (including its setting) should be accompanied by a heritage statement which is proportionate to the importance of the asset and its setting.

Where there is the potential for areas of archaeological interest to be affected, an archaeological assessment should be prepared by a suitably qualified professional and informed by available evidence including desk-based assessments and where appropriate field evaluation to establish the significance of known or potential heritage assets.

The loss of heritage assets will be resisted. Where this is not possible, development consent which would result in the loss of all, or part of, the significance of a heritage asset, a historic building record and/or archaeological excavation will be required. Results should be published and made publicly available and added onto the Historic Environment Record.

The council will support measures which secure the improved maintenance, management and sustainable reuse of heritage assets (where appropriate), particularly those which are identified nationally or locally as being at risk.

Development proposals should be consistent with other Local Plan policies.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Reference	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
NB8	0	0	0	+	0	0	0	0	++	0	0	+

J.11.1.1 Throughout South Staffordshire, there is a diverse range of heritage assets which provide a strong sense of place and historic character.

J.11.1.2 Strategic Policy NB8 promotes the conservation and enhancement of the historic environment through the positive management and safeguarding of heritage assets and their setting through various criteria, in line with the NPPF and seeking opportunities to better reveal the significance of heritage assets. The policy also supports the sensitive reuse of heritage assets which could help to improve the condition of Heritage at Risk assets. Therefore, a major positive impact on the historic environment is anticipated (SA Objective 9).

J.11.1.3 This policy could lead to enhancement of local landscapes which focus around built heritage, leading to a minor positive impact, where development is to demonstrate “*how they conserve or enhance the character, appearance, and function of heritage assets and their settings and respect the significance of the historic environment*” (SA Objective 4). Additionally, through ensuring historic assets are protected and enhanced this could potentially support and encourage tourism and the visitor economy, leading to a minor positive impact on the local economy (SA Objective 12).

J.11.2 NB9: Canal network

NB9: Canal network

The development of new, or the expansion of existing, canal side facilities such as mooring, service facilities and marinas should be located within or in close proximity to existing settlements. Developers will be required to demonstrate their commitment to integrating proposals within the local community to become part of the ‘public realm’ of the settlement.

Proposals will be supported where they meet all of the following criteria:

- a) Conserve and enhance the heritage, scenic and wildlife value of canals.
- b) Are sensitively designed and enhance the setting of the waterways particularly in relation to scale, layout, character, massing, form, materials and landscaping.
- c) Enhance the recreation and tourism value of the canal network.
- d) Contribute positively to the function and appearance of canals, and wherever possible provide new life for redundant buildings.

The recreational value of canals for walking cycling and canoeing will be encouraged and promoted for their contribution to the health and wellbeing of residents and visitors. Opportunities will be sought to improve the accessibility of the canal network through the provision of improved surfacing, access points and wayfinding as a recognition of their important role as a key element of the green/blue infrastructure network.

Proposals for the environmental improvement and restoration of canals, including the Hatherton Branch Canal (either fully or as a Heritage Towpath Trail), will be supported having regard to the benefits to the canal system and rural regeneration provided there will be no adverse impact on the natural and historic environment including designated sites and habitats. Prior to any canal being restored to a navigable condition, evidence will need to be provided to the Environment Agency to demonstrate that the abstraction of water to feed the canal is sustainable.

The route of the Hatherton Canal as shown on the Policies Map will be safeguarded from any development which would prejudice the restoration of the canal.

Development proposals should be consistent with other Local Plan policies.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Reference	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
NB9	+	0	+	+	+	0	0	+	+	0	0	0

J.11.2.1 Canals within South Staffordshire include ‘Shropshire Union Canal’, ‘Staffordshire and Worcestershire Canal’ and ‘Stourbridge Canal’. Policy NB9 seeks to support new canal-

side development which can adhere to conservation and enhancement of the canal network through various measures.

- J.11.2.2 This policy will help to ensure that new canal-side development “*conserve and enhance the heritage, scenic and wildlife value of canals*” and it also sets out to support proposals for the “*environmental improvement and restoration of canals, including the Hatherton Branch Canal*”. The canal network forms an important element of the area’s heritage. Therefore, through conservation and restoration of these assets, a minor positive impact on the local historic environment could be expected (SA Objective 9).
- J.11.2.3 By supporting measures which promote the biodiversity of canals and improve the accessibility of the canal network through their “*important role as a key element of the green/blue infrastructure network*”, a minor positive impact on climate change mitigation, local biodiversity and pollution could be expected (SA Objectives 1, 3 and 5) where GI provides opportunities for habitat connectivity, flood mitigation and the filtration of pollutants.
- J.11.2.4 The canal network forms a distinctive element of the landscape character of the district. By appropriately guiding new canal-side development, the policy will be likely to have a minor positive effect on landscape character (SA Objective 4).
- J.11.2.5 Since “*the recreational value of canals for walking cycling and canoeing will be encouraged*”, a minor positive impact on health and wellbeing can be expected (SA Objective 8).



Lepus Consulting
Eagle Tower,
Montpellier Drive,
Cheltenham
Gloucestershire GL50 1TA

t: 01242 525222
w: www.lepusconsulting.com
e: enquiries@lepusconsulting.com