



Land at Yieldfields Farm, Bloxwich

South Staffordshire Local Plan Review Publication (Regulation 19) consultation
April 2024

On behalf of **L&Q Estates**



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Contents

1 Introduction..... 1
2 National Planning Policy Framework 4
3 Publication Plan Policies 6
4 Evidence Base 11
5 Land at Yieldfields Farm 18

Appendices

- Appendix A Site Location Plan
- Appendix B Policy WSA4 - Yieldsfield Farm
- Appendix C Illustrative Concept Masterplan
- Appendix D Transport Technical Note
- Appendix E Green Belt Appraisal *
- Appendix F Sustainability Appraisal Review

* Appendix E enclosed under separate cover due to file size

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1 Introduction

- 1.1.1 Stantec is instructed on behalf of our client, L&Q Estates, to respond to the South Staffordshire Council (Regulation 19) Publication Pre-Submission Plan April 2024. This representation is made in relation to L&Q Estates' interest at land at Yieldfields Farm, Bloxwich (hereafter referred to as 'the Site') and should be read in conjunction with the representation made to the Regulation 19 'Preferred Options' consultation of December 2022 and other previous consultation stages.
- 1.1.2 This response is framed within the tests of soundness as set out in Paragraph 35 of the National Planning Policy Framework ('NPPF'). 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.
 - b. Justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.
 - c. Effective - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.
 - d. Consistent with national policy - enabling the delivery of sustainable development in accordance with the policies in the Framework and other statements of national planning policy, where relevant.'
- 1.1.3 Where relevant, this response identifies whether the Local Plan is not legally compliant, is unsound or fails to comply with the duty to co-operate, as well as identifying modifications considered necessary to make the Local Plan sound.
- 1.1.4 This response has regard to the Local Plan Review Evidence Base, with specific reference made to:
- Duty to Cooperate Paper 2024
 - Green Belt Exceptional Circumstances 2024
 - Strategic Growth Study Addendum 2023
 - Spatial Housing Strategy Topic Paper 2024
 - Housing Site Selection Topic Paper 2024 including discounted sites
 - Strategic Housing Market Assessment Update 2024

Previous Representation

- 1.1.5 L&Q Estates have previously submitted the Site to the South Staffordshire Call for Sites exercise in November 2017 (ref: 492a, 492b and 492c), in addition to making Representations to the

Issues and Options Consultation in November 2018 (under their previous name Gallagher Estates), the Spatial Housing Strategy and Infrastructure Delivery Consultation in October 2019 and the Preferred Options Consultation in December 2021. Representations were also made in December 2022 to the initial Regulation 19 (Preferred Options) Consultation.

- 1.1.6 This Response should accordingly be read in conjunction with these previous responses. In particular, L&Q Estates is disappointed to note that a number of comments relevant to the overall level of growth and the spatial strategy within its Preferred Options response have not been addressed by the Council. Similarly, it is disappointing to see the proposed changes from the December 2022 Regulation 19 draft plan, including the vast reduction in contribution to the Greater Birmingham and Black Country Housing Market Area ('GBBCHMA') unmet housing need.
- 1.1.7 A number of comments have also previously been provided in respect of minor recommended alterations to development management policies within the Plan. Whilst these comments do not go to the heart of the tests of soundness, they nonetheless remain relevant in ensuring that the plan is clear and legible for applicants and decision-makers. It is therefore recommended that the Council revisits these responses.

Executive Summary

Duty to Cooperate

- 1.1.8 L&Q Estates consider that the Council has not demonstrated that it has passed the duty to cooperate.
- 1.1.9 The Statement of Common Ground appended to the submitted Duty to Cooperate Topic Paper (2024) is dated August 2022, and has only been signed by nine out of 17 authorities. There are a number of issues with this, namely:
- From the limited number of signatories it is evidence that not all authorities are in agreement
 - No evidence of signatories has been provided
 - The SoCG has not been updated since the previous Regulation 19 (Preferred Options) consultation and contains inaccurate information in relation to a number of matters, but crucially unmet housing need and contributions towards meeting this need
- 1.1.10 The Duty to Co-operate Schedule table also describes the Council's approach in meeting unmet housing need arising from the Black Country and Birmingham. However, it is light in detail and relies upon the incomplete SoCG referred to above as evidence of cooperation.
- 1.1.11 Crucially, in respect of outcomes of the cooperation, the Schedule states that:
- "South Staffordshire Council wrote to all authorities within the GBBCHMA in October 2023 setting out that South Staffordshire was revising its strategy and asked for their initial views on this revised approach. These letters and responses can be found in Appendix"*
- 1.1.12 The above statement terminates without providing direction to an Appendix where the letters can be found (it appears as though they are absent).

1.1.13 Whilst a summary is provided at Appendix E to the DtCP (*Summary of key Duty to Cooperate events relating to housing and employment with the Black Country authorities and Birmingham*), it is submitted that the Council must publish these letters in advance of the Local Plan EiP, in order for the examination to take place in a transparent manner.

1.1.14 The summary indicates that 12 out of 17 authorities responded, yet (incredibly briefly) summaries the response provided by only five of them. It is considered likely that the others (and quite possibly the five identified) raised concerns in respect of the reduced contribution to the GBBCHMA.

Positively Prepared

1.1.15 L&Q Estates consider that the Publication Plan (Regulation 19) is not positively prepared.

1.1.16 South Staffordshire, whilst meeting their own objectively assessed needs, have not prepared the plan to meet the unmet need from neighbouring areas, i.e. the GBBCHMA. This comes in spite of the previous Regulation 19 Publication plan's contribution of 4,000 homes to the GBBCHMA. The latest plan considers that the 2018 Strategic Growth Study is now out of date and refers to a Statement of Common Ground (2022) between the HMA authorities as evidence of this. However, this has not been signed by a number of authorities and does not reference the datedness of the evidence. The assertion concerning the datedness of the Strategic Growth Study is also made despite the fact that the Study indicates that the unmet need is increasing, rather than decreasing. This is supported by the Birmingham Local Plan Regulation 18 Consultation document (October 2022).

1.1.17 Furthermore, if the Council is of the view that the Strategic Growth Study is out of date, then it should have made attempts to prepare updated evidence as part of the Local Plan. It is evident that the Council's reasoning is a tenuous attempt to justify the significant reduction in Green Belt release.

1.1.18 Whilst it is recognised that the Council is no longer obliged to consider Green Belt release under the 2023 NPPF, it remains that the Council is proposing to release Green Belt land through the Plan. Therefore, as a point of principle, Green Belt release is accepted by the Council.

1.1.19 The Council has therefore failed to approach the unmet need from the GBBCHMA in a positive manner.

Justified

1.1.20 L&Q Estates consider that the Publication Plan (Regulation 19) is not justified.

1.1.21 As referred to above, if the Council is of the view that the Plan's evidence base is out of date, then it should be working on updating the evidence, not progressing an unevidenced plan. The 2018 SGS was not found out of date as part of the recent Solihull or Shropshire Local Plan examinations, nor has it been referred to as out of date within any of the recent Black Country authority Regulation 18 public consultations.

Effective

1.1.22 As a result of the above, the Plan is not effective as it does not meet South Staffordshire's contribution towards the unmet evidenced housing need within the GBBCHMA.

2 National Planning Policy Framework

The Local Plan Review reached Regulation 19 stage in November 2022 and should therefore be examined under the 2021 version of the NPPF.

- 2.1.1 Text within the introductory section of the Local Plan explains that the council undertook consultation on a Publication Plan (Regulation 19) in November 2022 with the intention being that this would be the Local Plan that would be submitted to Secretary of State for independent examination. However, significant proposed changes to national planning policy published in December 2022, specifically in relation to Green Belt policy, led the council to pause preparation of the Local Plan in January 2023 in order to await clarity on the government's intentions.
- 2.1.2 Following the publication of the revised NPPF in December 2023, the Council is now progressing with a revised version of the Local Plan, referred to as the 'Publication' version dated April 2024. This version would 'supersede' the previous version and would be the version submitted to the Secretary of State.
- 2.1.3 The most notable amendment to the Publication Plan reflects changes to national policy relating to Green Belt introduced through the December 2023 NPPF.
- 2.1.4 However, the December 2023 NPPF also includes transitional arrangements for plans which were undergoing preparation at the time of publication. These are set out at Paragraph 230, which states in full:

"The policies in this Framework (published on 19 December 2023) will apply for the purpose of examining plans, where those plans reach regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (pre submission) stage after 19 March 2024. Plans that reach pre-submission consultation on or before this date will be examined under the relevant previous version of the Framework in accordance with the above arrangements. For Spatial Development Strategies, this Framework applies to strategies that have reached consultation under section 335(2) of the Greater London Authority Act 1999 after 19 March 2024. Strategies that reach this stage on or before this date will be examined under the relevant previous version of the Framework in accordance with the above arrangements. Where plans or strategies are withdrawn or otherwise do not proceed to become part of the development plan, the policies contained in this Framework will apply to any subsequent plan or strategy produced for the area concerned."

- 2.1.5 It is important to note in this context that:
- 1) The 'Plan' in question is the *South Staffordshire Local Plan Review*
 - 2) 'Strategies' refers to Spatial Development Strategies brought forward under the Greater London Authority Act and is therefore not relevant here
 - 3) The Plan reached Regulation 19 Stage in November 2021
 - 4) The Regulation 19 November 2021 version of the Plan has not been formally withdrawn
- 2.1.6 The Council appears to be of the view that, given the latest Regulation 19 version of the Plan is dated April 2024 (and therefore post-dates 19th March 2024) the Plan should be examined under the December 2023 version of the NPPF.

- 2.1.7 However, as set out above, the Plan (that being the South Staffordshire Local Plan Review) reached Regulation 19 stage in November 2021 i.e before 19th March 2024. This Plan has not been formally withdrawn, as is required by Paragraph 230 of the NPPF.
- 2.1.8 Furthermore, should the Council be of the view that the Plan “*otherwise [did] not proceed to become part of the development plan*” as per NPPF 230, this would be an incorrect interpretation of the Paragraph, which is instead intended to capture a scenario where a planning authority abandons a plan in abeyance after Regulation 18 stage i.e it that plan is not withdrawn or progressed, and then begins to prepare a new plan.
- 2.1.9 Lastly, the Council cannot argue that the ‘strategy’ (i.e the spatial strategy) did not proceed to become part of the development plan, as ‘strategies’ in the context of NPPF 230 refers to Spatial Development Strategies brought forward under the Greater London Authority Act and is therefore not relevant here.
- 2.1.10 As a result, **the Plan should be examined under the July 2021 version of the NPPF.**
- 2.1.11 The implications of this are that the Plan to be examined is not in accordance with National Policy and, as such, the Council is obliged to revisit and re-progress the Regulation 19 version of the Plan consulted upon in November 2021.

3 Publication Plan Policies

Policy DS4 – Development Needs

Policy DS4 is not considered to be sound as it is not positively prepared, not justified and not consistent with national policy for the reasons set out below.

- 3.1.1 *Policy DS4 – Development Needs* was introduced in the initial Regulation 19 Preferred Options document from December 2022. The policy in the Preferred Options document stated that the Council would promote the delivery of a minimum of 9,089 homes over the period 2018 - 2039, providing approximately 13% additional homes to ensure plan flexibility. It went on to state that the housing target includes a 4,000-home contribution towards unmet housing needs of the GBBCHMA.
- 3.1.2 The Publication document of April 2024 amends these figures. Policy DS4 now states that it will promote the delivery of a minimum of 4,726 homes over the plan period 2023 – 2041. This figure is stated as being to meet the District’s housing requirement of 4,086 (227 dwellings per annum derived from the Standard Method across an 18 year plan period), plus a 640-home contribution towards the unmet housing needs of the greater Birmingham and Black Country Housing Market Area. The Plan describes this provision as a ‘capacity led’ approach that focuses the majority of growth on the district’s most sustainable settlements, with Green Belt release limited to these Tier 1 settlements. The level of housing provision is summarised at paragraph 5.21 of the Plan and is reproduced below:

South Staffordshire’s LHN using the Standard Method (2023-2041)	4,086
Additional housing to contribute towards the unmet needs of the GBBCHMA	640
Total number of dwellings to be planned for	4,726

Reproduction of South Staffordshire Publication Plan Table 7: Housing Target

- 3.1.3 The overall level of proposed growth has therefore been significantly reduced from the December 2022 Regulation 19 Plan.
- 3.1.4 The justification provided for this reduction is that the delay to the preparation of the Local Plan means that the Strategic Growth Study (2018)¹ is ‘out of date’ (Paragraph 5.12 of the Local Plan).
- 3.1.5 This argument is flawed on four grounds.
- 3.1.6 The first is that the Strategic Growth Study has formed part of the evidence base of several other local plans being progressed within the West Midlands (most recently Shropshire and Solihull) and has not been found to be out of date by the appointed inspectors. Similarly, neither the Birmingham Local Plan Regulation 18 Consultation document (October 2022), Dudley Local Plan Regulation 18 Consultation document (October 2023), Sandwell Local Plan Regulation 18 Consultation document (November 2023) nor the Wolverhampton Local Plan Regulation 18

¹ Greater Birmingham Housing Market Area Strategic Growth Study (2018), prepared by GL Hearn and Wood. It should be noted that, despite its title, the Strategic Growth study also considers the Black Country in addition to Birmingham.

consultation document (February 2024) make any suggestion that the Strategic Growth Study is out of date.

- 3.1.7 The second is that the constituent authorities do not all agree with South Staffordshire Council that this piece of evidence is out of date. Section 5 the Statement of Common Ground (August 2022) included at Appendix B to the Duty to Cooperate Topic Paper (2024)² includes evidence from numerous LPAs (Black Country, Bromsgrove, Cannock Chase, North Warwickshire, Lichfield, Redditch, Solihull, Stratford) that the Strategic Growth Study represents the only independent document providing GBBCHMA shortfall evidence and therefore local plans are progressing on that basis.
- 3.1.8 This SoCG has (allegedly) been signed by 9 out of the 17 signatories sought to date. It is therefore evident that there remains significant disagreement between the HMA authorities and it cannot be asserted by South Staffordshire Council that the SoCG constitutes evidence of agreement that the Strategic Growth Study is out of date.
- 3.1.9 Thirdly, even if it is accepted that the Strategic Growth Study is out of date, it is inappropriate for the Council to progress a Local Plan in an evidence base vacuum. Instead, the Council should be working with the relevant Local Authorities to update the Strategic Growth Study to inform plan making in the HMA going forward. The need for an up to date evidence base which considers cross boundary matters is set out within the Council's own Duty to Cooperate Paper. This is particularly relevant given that a new local plan for Birmingham is currently being progressed.
- 3.1.10 Fourthly, again if it is accepted that the Strategic Growth Study is out of date, other more recent evidence across the HMA from Birmingham and the Black Country authorities' evidence bases produced between 2022 and 2024 (further described below) identifies that the unmet housing need to 2041/42 stands at circa. 108,906 homes. This figure is overwhelmingly significant and more than justifies the 4,000 home contribution (as a minimum) proposed in the previous iteration of the Plan.

Unmet Housing Need

- 3.1.11 Unmet housing needs have been identified within the GBBCHMA for a number of years, with the 2017 Birmingham Development Plan (BDP) establishing a substantial unmet need of 37,900 dwellings arising from Birmingham by 2031. The BDP indicated that the City Council would progress a joint study to provide a strategy for accommodating the shortfalls across the GBBCHMA. Since then, Birmingham have started work on a new plan and an Issues and Options consultation ended 5th December 2022 which identified an approximately 78,415 home shortfall. Before work ceased on the Black Country Plan, the August 2021 Draft Plan consultation indicated a 28,239 dwelling shortfall, despite some emerging Green Belt release. Whilst the Black Country Plan is no longer being progressed, the evidence base behind it, including the evidence on urban capacity and housing, remains relevant to the authorities in the housing market area. The individual Black Country Authorities are now preparing their own Local Plans. Wolverhampton City Council consulted on a Regulation 18 Consultation Plan (dated February 2024) which identified a potential 11,413 dwellings shortfall. Sandwell Council held a Regulation 18 consultation ending in December 2023 which estimated around a 18,000 dwellings shortfall. Dudley Council also held a Regulation 18 consultation ending in December

² Local Plan Review Publication Plan Duty to Cooperate Topic Paper (April 2024) prepared by South Staffordshire Council

2023 which estimated around a shortfall of 1,078 dwellings. It is Walsall Council's intention to proceed under new arrangements of plan making.

- 3.1.12 The total shortfall arising from within the GBBCHMA (excluding any arising from Walsall) is therefore currently circa. 108,906 homes to 2041/42.

Meeting the Unmet Housing Need

- 3.1.13 The District's proposed 4,000 contribution to wider unmet housing needs was included in the November 2022 Preferred Options (Regulation 19) consultation following testing through plan preparation. However, following proposed changes to the NPPF published in December 2022, progress on the previous iteration of the plan was paused.
- 3.1.14 In December 2023 the updated NPPF was published and 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.
- 3.1.15 Given the change in circumstances, the Council tested further spatial strategy options considering the ways in which housing growth could be distributed across the District, as detailed in the council's Spatial Housing Strategy Topic Paper 2024. Unlike the majority of previous options tested, the new options tested (Options H and I) considered different levels of growth based upon capacity led approaches that further limited Green Belt release compared to other options tested, and with a greater focus on the District's 'tier 1' settlements.
- 3.1.16 Having considered all of these different approaches previously tested in earlier iterations of the Local Plan, and their relative merits in the round, the Council's preferred approach is Spatial Option I - a capacity-led approach focusing growth to sustainable non-Green Belt sites.
- 3.1.17 However, this crucially still includes Green Belt development (albeit reduced) in Tier 1 settlements well served by public transport. The Council therefore considers that exceptional circumstances exist to justify Green Belt release, despite national policy indicating any Green Belt release is solely the choice of the council. This is expanded on further in the council's Green Belt Exceptional Circumstances Topic Paper 2024.
- 3.1.18 Given that the principle of Green Belt release is engaged, it becomes a matter of scale.
- 3.1.19 The Council has previously tested the provision of 4,000 homes through the Local Plan (and sustainability appraisal) process and found it to be sustainable. The purported datedness of the Strategic Growth Study is divorced from the sustainability of an identified strategy, which includes considerations of matters such as climate change, biodiversity, landscape, flood risk and the economy.
- 3.1.20 It is therefore submitted that the Council should revert to the level of housing provision provided for within the previous iteration of the Local Plan and attempt to address housing needs in a more positive manner.

Policy DS5 – The Spatial Strategy To 2041

Policy DS5 is not considered to be sound as it is not justified and not consistent with national policy for the following reasons:

- 3.1.21 Policy DS5 identifies a settlement hierarchy for South Staffordshire District. The December 2022 version which included ‘*Growth adjacent to the neighbouring towns and cities in the Black Country*’ as its own distinct tier within this hierarchy. This tier has been removed in the April 2024 version and this has resulted in the removal of three allocations which were included to meet the unmet need of GBBCHMA – Land at Cross Green, Land North of Linthouse Lane and Land at Langley Road.
- 3.1.22 As set out within our response above to Policy DS4 (Development Needs) and as highlighted in our previous representation, Stantec has considered the significant implications of Standard Method when it comes to reviewing the emerging Birmingham Local Plan (as evidenced by the Birmingham Local Plan Regulation 18 Consultation document) and the policy vacuum left by the abandonment of the Black Country Plan.
- 3.1.23 As part of the Standard Method, both Birmingham and Wolverhampton are subject to a 35% uplift in housing need, reflecting their status as two of the top 20 most populated urban centres within England.
- 3.1.24 Taking all of this into account, a substantial housing shortfall will continue to arise across the GBBCHMA up to 2042. As set out above, this shortfall is in excess of 100,000 homes.
- 3.1.25 Whilst Policy DS5 seeks to deliver the *local* housing for South Staffordshire need identified through Policy DS4, we consider that further housing allocations are required, given the GBBCHMA shortfall represents a ‘best case scenario’. The shortfall could increase even further as the supporting evidence base continues to be tested through the emerging Birmingham and Black Country local plans. L&Q Estates fundamentally disagrees with the assertion that the Strategic Growth Study is out of date. Even if it was, the indications within the Study were that the unmet need would increase, not decrease.
- 3.1.26 In light of the above, we consider that further strategic housing sites, including Yieldfields Farm, should be allocated within the South Staffordshire Local Plan, in order to assist the Council in meeting the unmet housing need arising from the GBBCHMA. Such an allocation would be consistent with the now removed tier ‘*Growth adjacent to the neighbouring towns and cities in the Black Country*’.
- 3.1.27 Importantly the southern section of the Site, located in Walsall, previously benefitted from a draft housing allocation for 978 homes in the Black Country Plan 2039. It is considered that the Site’s proximity to the urban area of Bloxwich, which can easily be accessed via sustainable modes of transport, means that it could have a significant role in meeting the cross boundary unmet needs of the Black Country and provides an opportunity to create a sustainable new community. This is further demonstrated by the Concept Masterplan submitted as part of this response, which demonstrates that the whole site (i.e. land within South Staffordshire and Walsall) is capable of delivering up to a total of 1,900 new homes, alongside the provision of two primary schools, local services and facilities as well as significant open space.
- 3.1.28 The need to deliver a sufficient supply of homes is emphasised in the NPPF and Paragraph 60 identifies that to support the Government’s objective of significantly boosting the supply of

homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. In addition, Paragraph 73 of NPPF confirms that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as significant extensions to existing villages or towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. Paragraph 74 further identifies that strategic policy-making authorities should work with other authorities, if appropriate, to identify sustainable locations for such development where this could help to meet identified needs in a sustainable way. It is therefore considered providing large urban extensions focused to the north of the Black Country where there is an unmet housing need, aligns with the aims of NPPF.

Policies SA1 and SA2 – Strategic Development Locations

- 3.1.29 Policies SA1 and SA2 are not considered to be sound as they are not positively prepared, not justified and not consistent with national policy for the following reasons:
- 3.1.30 The Council has produced a Housing Site Selection Topic Paper (2024), which follows the previous Housing Site Selection Topic Papers (September 2021 and November 2022) which all form part of the evidence base supporting the Local Plan.
- 3.1.31 The documents set out how the Council will assess and allocate housing site options to meet its proposed housing target for the Local Plan. It summarises which sites are proposed for housing and which are not, including summary reasons for this decision. To ensure all relevant factors for site selection are highlighted on a site-by-site basis, the Council has prepared proformas for each of the sites shortlisted for assessment (included at Appendix 3 of the Housing Site Selection Topic Paper). Within the site assessment proformas, major positive and major negative effects arising within the post-mitigation site assessments in the Sustainability Appraisal are recorded. These findings are linked to the Sustainability Appraisal, which has also been updated in 2024.
- 3.1.32 The updated 2024 Housing Site Selection Topic paper summarises Land at Yieldfields Farm (Site Ref: 492 a, b and c), in the context of the Council's new preferred spatial strategy (Option I), concluding that the land is not adjacent to a Tier 1 settlement and thus is not consistent with the preferred spatial strategy.
- 3.1.33 It is submitted that this assertion is misleading and is evidence of preparing evidence to suit an already known preferred strategy, rather than the evidence being used to inform the preferred strategy.

4 Evidence Base

Duty to Cooperate Paper 2024

- 4.1.1 The Duty to Cooperate Topic Paper (‘the DtCP’) has been prepared by the Council in order to demonstrate compliance with the duty to co-operate was introduced through the Localism Act 2011, with Section 110 of the Act requiring Councils and public bodies to “*engage constructively, actively and on an ongoing basis*” in the preparation of Local Plan documents, including in the preparation of evidence to underpin those documents.
- 4.1.2 It is important to state at this juncture that, whilst the duty to co-operate is to be abolished by Schedule 7 of the Levelling up and Regeneration Act, Schedule 7 is not yet in force. As such, the duty to co-operate is still in force with respect to soundness for the purposes of plan-making.
- 4.1.3 In this regard, whilst there is no fixed format for presenting evidence to satisfy the duty to co-operate, the DtCP states that, amongst other things:
1. A key requirement is the need to produce, maintain and update one or more statement(s) of common ground throughout the plan-making process.
 2. Strategic policy-making authorities [should] consider producing or commissioning joint research and evidence to address cross-boundary matters, agreeing strategic policies affecting more than one authority area to ensure development is co-ordinated.
- 4.1.4 In order to demonstrate compliance with the duty to cooperate, the Council has prepared a Table at Appendix A of the DtCP which sets out the cross strategic planning issues that the Council will need to consider, the local authorities relevant to that strategic matter, engagement on each issue to date and proposed next steps.
- 4.1.5 These matters are considered in turn below.

Statement of Common Ground

- 4.1.6 In respect of point 1, Paragraph 5.8 of the DtCP refers to a *GBHMA Development Needs Group Draft Statement of Common Ground* dated August 2022 (included at Appendix B of the SoCG). The DtCP states that states the SoCG has been prepared with officers of the GBBCHMA officer group following a Duty to Cooperate meeting between all authorities in December 2021. This SoCG is stated to have only been signed by 9 out of the 17 signatories sought to date.
- 4.1.7 L&Q Estates wishes to raise concerns that that the information within the SoCG is also no longer correct. For example:
- The Local Plan Review contributions set out in Table 2 – South Staffordshire is no longer proposing a 4,000 home contribution to the unmet need; the emerging Black Country Local Plan has been abandoned; as has the emerging Lichfield Plan.
 - It does not consider the latest evidence arising from the emerging Birmingham Local Plan.

- 4.1.8 Given the SoCG is dated August 2022 (i.e. it pre-dates the previous Regulation 19 consultation undertaken by the Council undertaken in November – December 2022), it is evident that it has not been kept up to date, in line with national requirements.
- 4.1.9 Simply put, it is evident that not all authorities are in agreement with the matters set out in the SoCG, given it was drafted nearly two years ago and only half of the constituent members have signed it. It can therefore only ever hold limited weight as a document.
- 4.1.10 The DtCP also includes a number of draft bilateral SoCG with each of the individual HMA authorities. However, again, none of these appear to be signed, so can only hold limited weight.

Evidence to Address Cross-Boundary Matters

- 4.1.11 In respect of point 2, within the Regulation 19 Pre-Submission Plan, the Council assert that the 2018 GBBCHMA Strategic Growth Study is out of date as justification for pursuing an alternative growth strategy.
- 4.1.12 However, the need to “*review the position to date and the deliverability of the 2018 Strategic Growth Study*” is included within the list of “*key issues and areas where an agreement is still being sought*”. It is therefore evidence that not all authorities are in agreement with this assertion. It is therefore irrational that South Staffordshire Council can suggest the SoCG constitutes evidence that the Strategic Growth Study requires updating.
- 4.1.13 Furthermore, if the Council is of the view that the Strategic Growth Study is out of date, it should have produced updated evidence to support this position, rather than pursuing an unevidenced Local Plan (given the Council recognises that Strategic policy-making authorities should consider producing or commissioning joint research and evidence to address cross-boundary matters).
- 4.1.14 Lastly, the SoCG also makes numerous other statements which contradict South Staffordshire Councils position, including:
- Paragraph 5.4, which recognises that housing need in Birmingham has increased since the BDP was adopted, meaning the housing shortfall through the new Birmingham Local Plan “*will be at least as severe as last time round*”.
 - Paragraph 5.8 concerns Cannock Chase District and states: “*The Strategic Growth Study is the only independent document providing GBBCHMA shortfall evidence, so the [Cannock Chase] local plan is seeking to test its recommendations. Cannock Chase is not aware of alternative evidence and is keen to make use of existing evidence and work with partners on that.*”
 - The summary of the ‘key areas for of agreement’ includes an “*agreement in principle to the plan making value of the existing evidence base, including the 2018 Strategic Growth Study, whilst acknowledging that this is not a policy document it is part of an evidence base to take matters forward through the local plan review process*”.

Duty to Co-operate Schedule

- 4.1.15 In respect of the Duty to Co-operate Schedule, the table describes the Council’s approach in meeting unmet housing need arising from the Black Country and Birmingham. However, it is

light in detail and relies upon the incomplete SoCG referred to above as evidence of cooperation.

4.1.16 Crucially, in respect of outcomes of the cooperation, the Schedule states that:

“South Staffordshire Council wrote to all authorities within the GBBCHMA in October 2023 setting out that South Staffordshire was revising its strategy and asked for their initial views on this revised approach. These letters and responses can be found in Appendix”

4.1.17 The above statement terminates without providing direction to an Appendix where the letters can be found (it appears as though they are absent).

4.1.18 Whilst a summary³ is provided Appendix E to the DtCP (*Summary of key Duty to Cooperate events relating to housing and employment with the Black Country authorities and Birmingham*), it is submitted that the Council must publish these letters in advance of the Local Plan EiP, in order for the examination to take place in a transparent manner.

4.1.19 The summary indicates that 12 out of 17 authorities responded, yet (incredibly briefly) summaries the response provided by only five of them. It is considered likely that the others (and quite possibly the five identified) raised concerns in respect of the reduced contribution to the GBBCHMA.

4.1.20 Without this evidence, it cannot be said that the Council has demonstrated that it has passed the duty to cooperate.

Green Belt Exceptional Circumstances Topic Paper 2024

4.1.21 The Green Belt Exceptional Circumstances Topic Paper (April 2024) forms part of the evidence base for South Staffordshire District Council’s new Local Plan for the period 2023 – 2041. It has been produced to support the Plan process and seeks to justify and outline the exceptional circumstances for the release of Green Belt land for housing.

4.1.22 The 2024 topic paper refers to paragraph 145 of the 2023 NPPF (formerly paragraph 140 of the 2021 NPPF) which states that there is no requirement for authorities to review or amend their Green Belt boundaries, but authorities may choose to review and alter the boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for change should be made only through the plan-making process. The 2024 topic paper notes that the paper is a key part of that evidence that sets out the case for exceptional circumstances for limited Green Belt release in the district.

³ *“South Staffordshire District Council wrote to all neighbouring authorities and authorities within the GBBCHMA to provide an update on the process of the South Staffordshire Local Plan. This included asking for an indication of what their position would be if SSDC were to revise its housing strategy to no longer review Green Belt boundaries to accommodate the housing needs of the district or contribution to the GBBCHMA unmet need, if the proposed changes to paragraph 142 of the draft NPPF were enacted (now incorporated into paragraph 145 of the December 2023 NPPF). The letter also stated that SSDC was still requesting assistance in meeting an unmet need for gypsy and traveller pitches. Out of the 17 authorities sent letters, 12 provided a written response and meetings were held with 2 others. 3 did not respond. In terms of Birmingham and the Black Country Authorities response to the issues of housing need, Birmingham CC stated that it would not object to a Plan purely because it did not include Green Belt allocations, should it be consulted on in the context of the NPPF, if drafted as per the recent consultation. Wolverhampton CC and Sandwell MBC stated that it was premature for them to comment. During a Duty to Cooperate meeting, Dudley MBC did not express a firm view. A response from Walsall stated that SSDC should still seek to contribute to meeting the unmet housing needs.”*

- 4.1.23 The Council's previous Regulation 19 Publication Plan (November 2022) was prepared in line with the 2021 version of the NPPF. The 2021 version of the NPPF shared a similar requirement to the latest publication that exceptional circumstances must exist to justify changes to Green Belt boundaries, and that the authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This includes whether the strategy has been *"has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground"* (paragraph 141(c) of the 2021 NPPF and paragraph 146 (c) of the 2023 NPPF).
- 4.1.24 The Council's reasoning to significantly reduce the housing requirement is a tenuous attempt to justify the significant reduction in Green Belt release and to address the GBBCHMA authorities housing shortfall, which is well established. Even in the current 2024 Regulation 19 version of the Local Plan Review the Council have found there are exceptional circumstances to release land from the green belt however they have failed to properly address the requirements of paragraph 146 c) of the latest version of the NPPF. This showcases that the April 2024 Regulation 19 Publication Plan has not been positively prepared, justified or effective and on this basis cannot be considered to accord with the NPPF.
- 4.1.25 Furthermore, it is evident that South Staffordshire has significantly reduced their housing need (Policy DS4) in the 2024 Publication Plan from the housing need in the 2022 due to paragraph 145 in the 2023 NPPF. However, paragraph 230 of the aforementioned NPPF states that *"the policies in this Framework (published on 19 December 2023) will apply for the purpose of examining plans, where those plans reach regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (pre submission) stage after 19 March 2024. Plans that reach pre-submission consultation on or before this date will be examined under the relevant previous version of the Framework in accordance with the above arrangements...Where plans or strategies are withdrawn or otherwise do not proceed to become part of the development plan, the policies contained in this Framework will apply to any subsequent plan or strategy produced for the area concerned"*.
- 4.1.26 The Council published their Regulation 19 Plan in November 2022. This plan has not been formally withdrawn and is very similar to the 2024 Regulation 19 Plan, save for the strategy for meeting the unmet needs of neighbouring authorities. The 2024 is essentially an amendment to the 2022 Regulation 19 Plan. The Council only 'paused' preparation of its Local Plan following the 2022 Regulation 19 Plan consultation. On this basis as the Council's Local Plan reached the pre-submission consultation stage before 19th March 2024 and in these circumstances paragraph 230 requires the plan to be examined under the 2021 version of the NPPF.
- 4.1.27 In summary the Council accepted in documents associated with evidence basis for the 2022 Regulation 19 Publication Plan that exceptional circumstances exist to justify changes to Green Belt boundaries. The Council continue to accept exceptional circumstances remain requiring changes to the Green Belt. The only difference is that the Council have reduced the contribution to the GBBCHMA unmet housing need by ~85%. As a consequence the current Local Plan Review is contrary to the NPPF, not least paragraph 11 b) of the Framework.

Strategic Growth Study Addendum 2023

- 4.1.28 The Strategic Growth Study Addendum (April 2023) sets out that the 2020/21 data for the GBBCHMA land supply shows that the capacity to accommodate new homes has marginally increased from 201,677 in 2020 to 205,926 in 2021, with Birmingham City Council responsible

for identifying the largest share of additional capacity. However, the 2020/21 data deals primarily with the 37,900 home shortfall identified in the Birmingham Development Plan 2011 – 2031 (adopted 2017). Since then, Birmingham City Council commenced the review of its plan in late 2022 and estimated a shortfall of 78,415 homes to 2042 based on the Standard Method in its Issues and Options document. The Standard Method calculation of Housing Need is higher than that used in the Strategic Growth Study baseline, which along with extended plan periods implies a much higher shortfall going forward.

- 4.1.29 In addition to Birmingham's updated shortfall, the Black Country Authorities consulted on a Regulation 18 Draft Black County Plan which estimated a shortfall of 28,239 homes to 2039 based on the Standard Method which is also not reflected in the 2021 data forming part of the addendum.
- 4.1.30 The Strategic Growth Study Addendum (April 2023) whilst forms part of the evidence base for the new Local Plan, has not been updated to provide evidence for the change in housing numbers as per Policy DS4 and DS5 of the 2024 Regulation 19 Publication Plan as it sets out that the Council will contribute 4,000 dwellings to mitigate the GBBCHMA housing shortfall.
- 4.1.31 With the latest GBBCHMA Housing Market Area Position Statement Addendum in April 2023, it is considered unreasonable for the Council to deem the 2018 Strategic Growth Study to now be out of date in the 2024 Regulation 19 Publication Plan, especially since it appears that the GBBCHMA housing shortfall is getting worse, not better.

Spatial Housing Strategy Topic Paper 2024

- 4.1.32 The Spatial Housing Strategy Topic Paper (April 2024) details the Council's spatial strategy for housing growth over the plan period 2023 – 2041.
- 4.1.33 As set out under the Green Belt Exceptional Circumstances 2024 section, the Council tested seven spatial strategy options considering the ways in which housing growth could be distributed across the district. The seven options were first tested through the 2019 Spatial Housing and Infrastructure Delivery and informed the Council's preferred spatial strategy approach that was consulted on through the 2022 Regulation 19 Publication Plan. Following the consultation of this plan, the Council paused preparation of the Local Plan following proposed changes to national policy.
- 4.1.34 The Council were of the view that the level of growth proposed (incorporating the 4,000 home contribution to the GBBCHMA unmet need) would be necessary in order to have a sound plan. The publication of the updated NPPF in December 2023 prompted the Council to review its strategic approach as they believe that there is no requirement for Green Belt boundaries to be reviewed or changed, and it was within authorities' gift to choose to do so where they could demonstrate exceptional circumstances. This is despite the fact that the Council's Local Plan was at Regulation 19 stage and was paused, not withdrawn, to await and review the NPPF amendments. As previously commented on, it is Stantec's view that the Council's Local Plan reached the pre-submission consultation stage before 19th March 2024 and therefore the 2024 Regulation 19 Publication Plan should be examined under the 2021 NPPF as prescribed by paragraph 230 the latest NPPF.
- 4.1.35 In addition to the changes to the NPPF, the Council deemed the Strategic Growth Study (2018) on which the previous 4,000 home contribution was informed was no longer up to date given the Local Plan preparation delays. The Council therefore concluded that the Strategic Growth

Study (2018) could not be relied on to justify the strategic level contribution and level of Green Belt release. The Council's conclusion to deem the Strategic Growth Study as out of date has already been commented on as summarised at paragraphs 3.1.4 to 3.1.10.

- 4.1.36 Given the changes to the NPPF, the Council committed to a further Regulation 19 consultation and developed two additional spatial options (option H and I), both of which did not include the previously proposed 4,000 home contribution to unmet needs of the GBBCHMA.
- 4.1.37 Spatial Housing Strategy Option I was chosen as the preferred option by the Council. Option I was to *'Meet the District's own needs 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'*. The assessment made by the Council of Option I identifies the following disadvantage of the option:

'Doesn't deliver the GBBCHMA Strategic Growth Study recommendations for employment-led growth of proportionate dispersal along the western edge of the Black Country'

- 4.1.38 It is interesting that the Council have used the Strategic Growth Study to assess options in the 2024 Spatial Housing Strategy Topic Paper when they have previously considered it to be out of date. If the Council are using this to assess options, then one further disadvantage should be option I's failure to provide an adequate contribution towards the unmet housing needs of the GBBCHMA as prescribed by the Strategic Growth Study.
- 4.1.39 Paragraph 5.5 of the 2024 Spatial Housing Strategy Topic Paper declares that the Council wrote to other GBBCHMA Council's requesting they indicate what their views would be if the Council were to propose a strategy that reduced or removed Green Belt release sites to meet housing needs from the plan. The Council accept that to date they have not received any alternative suggested strategic approaches from these Duty to Cooperate bodies and therefore have pressed ahead with progressing with spatial option I. This indicates that the Council's 2024 Regulation 19 Publication Plan has not been positively prepared or effective in line with paragraph 35 of the NPPF as the plan has not had agreements from the other GBBCHMA Council's to significantly reduce South Staffordshire's identified 4,000 home contribution to the GBBCHMA unmet housing need. Subsequently, based on the fact the Council have chosen to ignore the key evidence base (e.g. Strategic Growth Study) the 2024 Regulation 19 Publication Plan is considered unsound and unsupported by evidence.

Housing Site Selection Topic Paper 2024

- 4.1.40 The purpose of the Housing Site Selection Topic Paper (2024) is to set out how the Council will assess and allocate housing site options to meet its proposed housing target for the Local Plan Review 2023 – 2041. It summarises which sites are proposed for housing and which are not, including summary reasons for this decision. The latest Housing Site Selection Topic Paper follows previous iterations (September 2021 and November 2022) which all form part of the evidence base supporting the Local Plan.
- 4.1.41 Paragraph 4.1 of the Housing Site Selection Topic Paper (2024) sets that once all the site options were assessed across the District, the Council then considered which sites to allocate in order to deliver its proposed spatial housing strategy (option I) i.e. a 'bottom up' approach where the housing target has been derived from the cumulative total capacity of the sites assessed as suitable.

- 4.1.42 The 2024 Housing Site Selection Topic Paper, Appendix 3 'Site Details' indicates that the Land at Yieldfields Farm (Site reference: 492 a, b and c) was ruled out as it is Green Belt land not adjacent to a Tier 1 settlement and would not be consistent with the Council's preferred spatial strategy.
- 4.1.43 It is submitted that this assessment is misleading and is evidence of preparing evidence to suit an already known preferred strategy, rather than the evidence being used to inform the preferred strategy. It also fails to take into account the NPPF requirement to promote sustainable patterns of development with the edge of the West Midlands conurbation representing a far more sustainable location than the settlements identified for growth.

Strategic Housing Market Assessment Update 2024

- 4.1.44 A Strategic Housing Market Assessment (SHMA) for South Staffordshire District Council was published in October 2022. The previous SHMA only modelled the future housing required through to 2040, with the SHMA Update published in February 2024 updating the outputs to extend it through to 2041 (in line with the new Local Plan period up to 2041).
- 4.1.45 The Standard Method to establish overall need for housing has changed between the 2022 SHMA and the 2024 SHMA update. The Standard Method calculation places a greater emphasis on delivering houses in the largest urban areas with the addition of a further step in the calculation that affects the 20 largest cities in England (which includes Birmingham and Wolverhampton). The approach is still based on a standardised calculation using publicly available data. The NPPG clarifies that it is only the 20 authorities which contain the largest proportion of the city or urban centre's population in which the 35% uplift is applied. On this basis no uplift was applied to the figures for South Staffordshire.
- 4.1.46 The overall housing need per annum in South Staffordshire under the 2024 SHM update was calculated to be 227 dwellings against 241 dwellings calculated under the 2022 SHMA for the plan periods. The difference in calculations is in relation to the different time periods by two years and the slight difference in the adjustment made taking into account affordability.
- 4.1.47 The 2022 Regulation 19 Publication Plan bases the Council's own housing need using the 2022 SHMA. Based on completions in the district since the start of that plan period (2018 – 2022) = 992 and then 17 years x 241 homes, this provides South Staffordshire's own housing target at 5,089 homes. This compares to the 2024 Regulation 19 Publication Plan of 4,086 homes for the period 2023 – 2041 (18 years x 227).
- 4.1.48 The overall housing need number within the 2024 Publication Plan is 4,726 compared to 9,089 in the 2022 Publication Plan. The main difference results from the additional housing contribution towards the unmet needs of the GBBCHMA (4,000 contribution under the 2022 Publication Plan compared to a significant reduction to only 640 under the 2024 Publication Plan). The significant reduction in the contribution towards the unmet needs of the GBBCHMA has not been explained or evidenced in the 2024 SHMA update, unlike the evidence provided to support the 4,000 dwelling contribution through the jointly prepared the GBBCHMA Strategic Growth Study in 2018, which the Council now considers to be out of date. Stantec again consider the 2024 Regulation 19 Publication Plan to be unsound as the plan has not been positively prepared, justified or effective in line with the provisions set out at paragraph 35 of the latest NPPF.

5 Land at Yieldfields Farm

Site Description

- 5.1.1 The Site is located within the Green Belt at the northern edge of Bloxwich, adjacent to the A34 (Stafford Road). A Site Location Plan is included at **Appendix A**. The Site falls within two administrative authority boundaries; the southern part of the Site lies within Walsall Borough and the northern part is within South Staffordshire District.

Policy Context

- 5.1.2 It is important to note that the southern part of the Site within Walsall previously benefitted from a draft housing allocation for 978 homes within the Draft Black Country Plan 2039 (Regulation 18) Consultation document (2021). An extract from Policy WSA4 of the Draft Black Country Plan 2039 is included at **Appendix B**. Whilst this Plan is now longer being pursued by the Black Country Authorities, the conclusions in respect of the Site remain valid and the Site is a sustainable location for development.
- 5.1.3 In this regard, it should be noted that Walsall Council has already commenced work regarding the preparation of a stand-alone local plan a view to consulting on an Issues and Options document in September 2023. It is therefore considered likely that the southern section of the Site will remain allocated for development through the emerging Walsall Local Plan.

Promoted Development

- 5.1.4 The Concept Masterplan (**Appendix C**) covers the whole site (i.e. land within South Staffordshire and Walsall) and demonstrates that the Site could deliver up to a total of 1,900 new homes, alongside the provision of two primary schools, local services and facilities as well as significant open space. In addition, this masterplan would deliver new green infrastructure together with ecological improvements and benefits. Again, this is important in the context of Paragraph 147 of the NPPF, which advises that plans should set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.

Transport and Accessibility

- 5.1.5 The Site benefits from a sustainable location with good access to surrounding modes of transport. Bloxwich North railway station, which provides services between Birmingham New Street and Rugeley Trent Valley, is located approximately 1.8km to the west and is accessible from the Site by walking, cycling and public transport. Bloxwich North railway station is located along the Chase Line which was recently subject to major improvement works including electrification to enable faster and more frequent services. In addition, the nearest existing bus stop to the Site is located approximately 650m to the west on Turnberry Road. Further bus stops are located approximately 750m to the south of the Site outside Bloxwich golf club and approximately 950m to the north of the Site opposite the New Masons. These bus stops are serviced by the X51, 1 and 74 bus services which provide direct links to Walsall, Stafford, Cannock and Birmingham. The draft allocation of the southern section of the Site located in Walsall within the draft Black Country Plan 2039 (Policy WSA4) will provide the opportunity to enhance these bus services and provide bus stops closer to the Site, particularly the northern section of the Site located in South Staffordshire. The Site's good public transport links are also

important in the context of Paragraph 147 of the NPPF, which identifies that where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land that is well served by public transport.

- 5.1.6 The Transport Technical Note (October 2021) prepared by Pell Frischmann (included at **Appendix D**) also concludes that the potential traffic impact of the proposals should not be a barrier to the proposed allocation of the Site. Suitable mitigation measures will be identified and developed should any junctions require improvement.
- 5.1.7 As such, it is considered that the Site is a sustainable location, close to existing public transport, where there is capacity to deliver a significant amount of housing to meet the identified need. This is significant in the context of Paragraph 147 of the NPPF in terms of prioritising land that is well served by public transport, where it has been concluded that it is necessary to release Green Belt land for development.

Green Belt

- 5.1.8 The Site comprises land that currently lies within the Green Belt. L&Q Estates nonetheless considers that the Site is a suitable and deliverable site that could be released from the Green Belt to deliver a sustainable large extension to the urban area of Bloxwich. The Site is available and covers approximately 122 hectares of land, comprising a series of parcels of land, all in one ownership, between Landywood and Bloxwich, with the Stafford Road (A34) running through the middle.
- 5.1.9 Barton Willmore's (now Stantec) Landscape Team have assessed the Site and have previously undertaken a Landscape and Visual and Green Belt Appraisal (LVGBA) (**Appendix E**). This Assessment considers that the Site makes only a limited contribution to the purposes of the Green Belt. The existing extents of built form along the A34 corridor towards settlements to the north have created a situation in which the urban area of Bloxwich has sprawled and there is potential for merging of towns. However, a shallow ridgeline on the northern edge of the Site provides the basis for reinforcement through green infrastructure provision to create physical features that are readily recognisable and likely to be permanent.
- 5.1.10 Yieldfields will deliver significant improvements to the quality and accessibility of the existing Green Belt. These improvements will include the creation of a landscape buffer and soft edge/transition along the development edge/perimeter of the new development to soften the visual impact on the surrounding countryside, thus providing a clearly defined and defensible Green Belt boundary. In addition, the development will retain and enhance existing mature tree belts and hedges, responding to the local countryside character to the north. In terms of connectivity, Yieldfields will include a network of green links, streets and spaces which will provide new pedestrian and cycle routes from the development to existing Public Rights of Way, improving access to the remaining Green Belt.

Landscape and Visual Impact

- 5.1.11 There is potential for sensitive development of the Site within the topographical containment provided by the shallow ridgeline extending through the northern part of the site; within the existing extent of development along the A34 north of Bloxwich; and avoiding development of the land in the eastern edge of the Site which is less subject to urbanising influences than those areas nearer the A34. The Concept Masterplan (**Appendix C**) sets out to create a landscape buffer and soft edge/transition along the perimeter/edge of the new development to soften the

visual impact on the surrounding countryside, thus providing a clearly defined and defensible Green Belt boundary in accordance with South Staffordshire's proposed development strategy (Strategic Objective 1). In addition, the Site would also provide a network of green links, streets and spaces which will provide pedestrian and cycle routes to public rights of way, improving access to the remaining Green Belt.


Deliverability

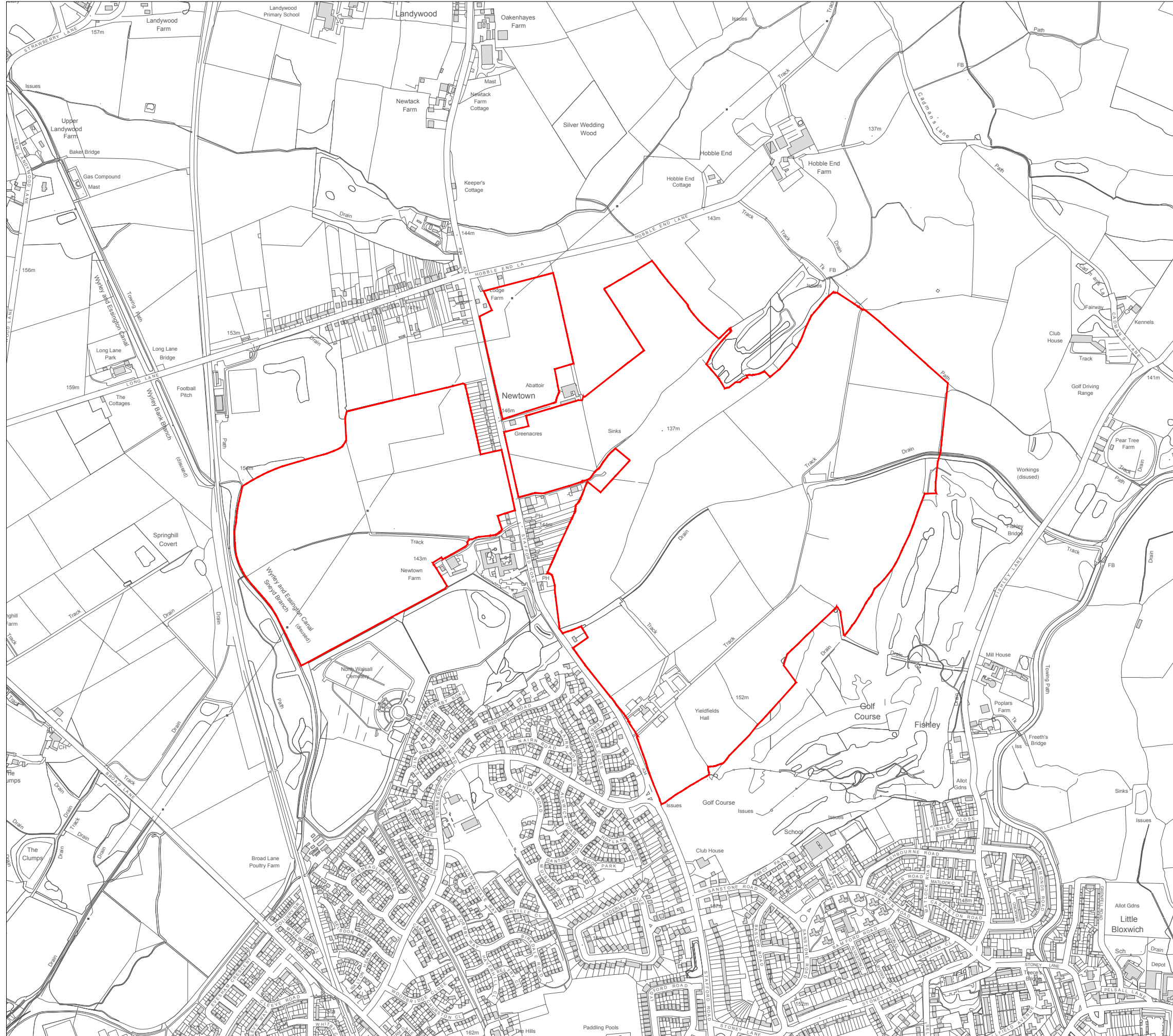
- 5.1.12 Therefore, L&Q Estates consider that the Site is a suitable and deliverable site that could be released from the Green Belt to deliver a sustainable extension to the urban area of Bloxwich. This would be in accordance with the aims of the NPPF and would also significantly assist in meeting the housing need of the Council and the unmet needs of the GBBCHMA.
- 5.1.13 We consider that Yieldfields should comprise a strategic allocation and, as such, should be included in Draft Policy DS5 (the Spatial Strategy to 2041) and in the Strategic Allocation policies (SA1-SA2). Barton Willmore's site-specific appraisal of the Site against the SA objectives (included at **Appendix F**) demonstrates that the Site represents a justifiable location for future residential-led development, which proposes approximately up to 900 homes within South Staffordshire and, as shown on the Concept Masterplan, a primary school, varied public open space and recreational facilities and allotments. We consider that the Site scores well against the 12 SA objectives.
- 5.1.14 Whilst Yieldfields benefits from a sustainable location, with the nearest bus stop located 650m from the Site, and the closest rail station located 1.8km from the Site.
- 5.1.15 Yieldfields has the potential to retain and enhance elements of the landscape, green infrastructure network and pedestrian and cycling routes in the existing and new community, providing benefits in relation to several objectives, including climate change mitigation and adaptation, biodiversity, health and wellbeing and economy and employment. Enhancement of the green infrastructure network will also provide benefit to the local Green Belt, by further supporting barriers to urban sprawl, and biodiversity features onsite through the provision of enhanced habitat and foraging provision.
- 5.1.16 Further afield, statutory and non-statutory ecological designations outside of the site footprint are not expected to be adversely affected by the future development due to their distance from site, and intervening development. The Site presents the opportunity to contribute to green corridors in the area, linking up networks of green spaces, including the canal corridor to the west.
- 5.1.17 Based on the above considerations, it is contended that there are no reasons that should preclude the Site from being chosen as a suitable and deliverable strategic housing allocation within the South Staffordshire Local Plan.

Appendix A Site Location Plan

The scaling of this drawing cannot be assured

Revision _____ Date _____ Drn _____ Ckd _____

 Site Boundary
122.78Ha / 303.39Ac



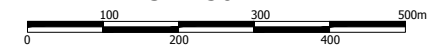
Project
**LAND AT YELDFIELDS FARM,
BLOXWICH**

Drawing Title
SITE BOUNDARY PLAN



Date 15.12.16 Scale 1:10,000@A3 Drawn by J.W. Check by I.S.

Project No 26036 Drawing No RG-M-30 Revision _____



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Appendix B Policy WSA4 - Yieldfield Farm

Bloxwich East

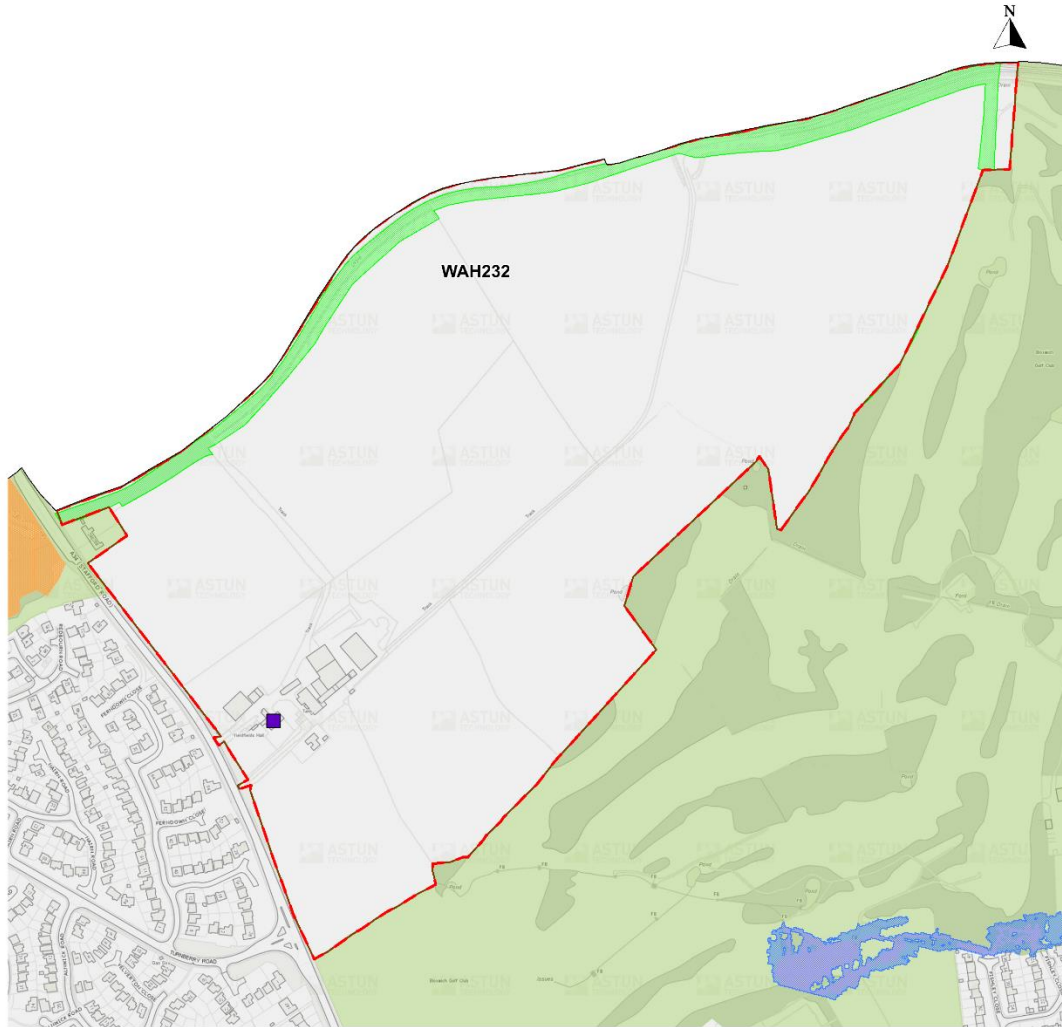
Policy WSA4 – Yieldsfield Farm (sometimes recorded as Yieldfields farm), Stafford Road, Bloxwich

Black Country | Plan
 Planning for the future of the Black Country

STRATEGIC ALLOCATION WSA.4



Walsall Council



Key	
	Strategic Allocations
	Housing Allocation
	Listed Building
	Site of Importance for Nature Conservation (SINC)
	Site of Local Importance for Nature Conservation (SLINC)
	Green Belt
	Environment Agency Flood Zone 2
	Environment Agency Flood Zone 3
	JBA Indicative Flood Zone 2
	JBA Indicative Flood Zone 3a
	JBA Indicative Flood Zone 3b

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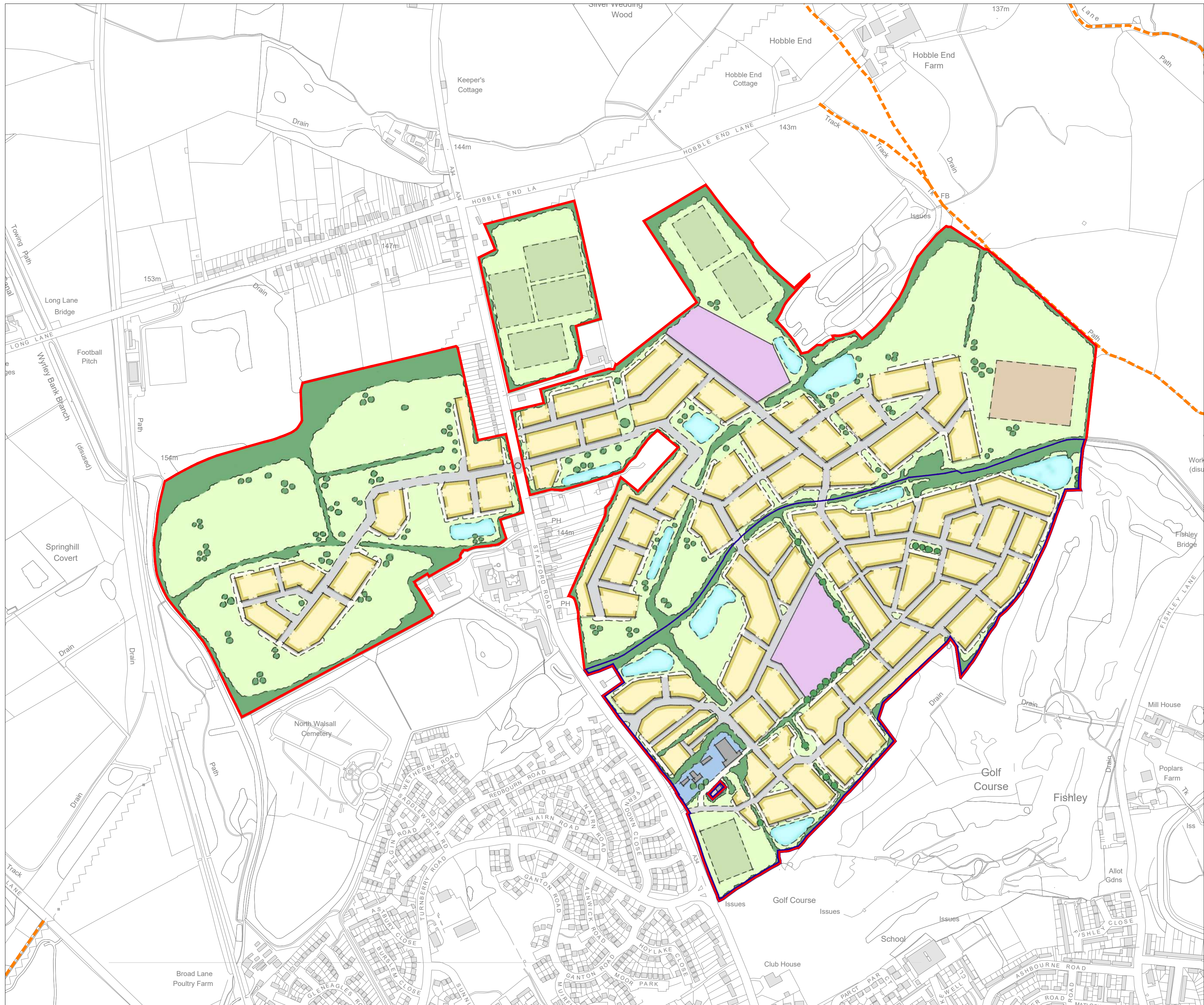
General introduction

- C.45 Yieldsfield Farm is located along the northern urban edge of Bloxwich. To the north are fields with Newtown and Landywood beyond in South Staffordshire District. To the east lie fields and to the south is Bloxwich Golf Course. To the west is the Turnberry housing estate, composed of predominantly modern, traditionally styled detached houses. Within this site is Yieldsfield Hall, a Grade II listed building.
- C.46 The developable site area is 26ha.
- C.47 The estimated capacity of the site is 978 houses.
- C.48 Mixed tenure housing is suitable on the site with higher densities of at least 35dph and affordable housing provision.

Design principles:

- High quality, sensitive design and layout that conserves and enhances the setting and significance of Yieldsfield Hall, a Grade II listed building; this must be informed by a detailed heritage character assessment for the proposal.
- Delivery of appropriate local facilities to support residents and to enhance the sustainability of the existing area, including a new primary, school and local health centre.
- Contribution to improvements for secondary school provision in North Bloxwich.
- Investigation and detailed proposals for remediation of contaminated land.
- A transport strategy that includes new crossing points on the A34 and a new vehicular junction to serve the development.
- A site-wide Sustainable Drainage Strategy, to ensure that drainage requirements can be met on site and are designed to deliver landscape, biodiversity and amenity benefits.
- A strategy for landscape and habitat creation that provides enhancement, retention and mitigation for established trees and hedges, to ensure there is no significant adverse impact on visual amenity and character, in particular that might be experienced from the north and west, and to ensure there is no significant adverse impact on protected animal species.

Appendix C Illustrative Concept Masterplan



The scaling of this drawing cannot be assured

Revision	Date	Drn	Ckd
C	06.12.21	SM	LH

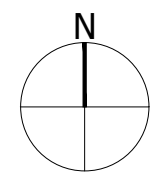

- Site boundary
- Land falling within Draft Allocation WSA4 in the Draft Black Country Plan
- Proposed residential development
- Proposed infrastructure
- Proposed school
- Proposed community hub
- Proposed attenuation
- Proposed public open space (incl. parks, play spaces and sports pitches)
- Retained and enhanced landscape
- - - Public Rights of Way

Project
Land at Yieldfields Farm, Bloxwich

Drawing Title
Illustrative Concept Masterplan

Date	Scale	Drawn by	Check by
24.11.21	1:5,000 @ A2	SM	LH
Project No	Drawing No	Revision	
26036	BM-M-14	C	

N

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Appendix D Transport Technical Note

P e l l F r i s c h m a n n

Land at Yieldfields, Stafford Road, Bloxwich

Transport Technical Note

105640

Project	Land at Yieldfields, Stafford Road, Bloxwich
Document Title or Subject	Technical Note
Document Reference	105640-PEF-ZZ-XX-RP-Z-000001
Revision Reference	P03
Date	07/09/2021

1 Introduction

1.1.1 Pell Frischmann has been commissioned by L&Q Estates to provide transport planning and highways consultancy services to support the draft strategic allocation of a site located off of Stafford Road, Bloxwich in the Emerging Black Country Plan (BCP). The location of the site, identified in Draft Policy WSA4, is shown in **Figure 1**.

Figure 1. Site Location



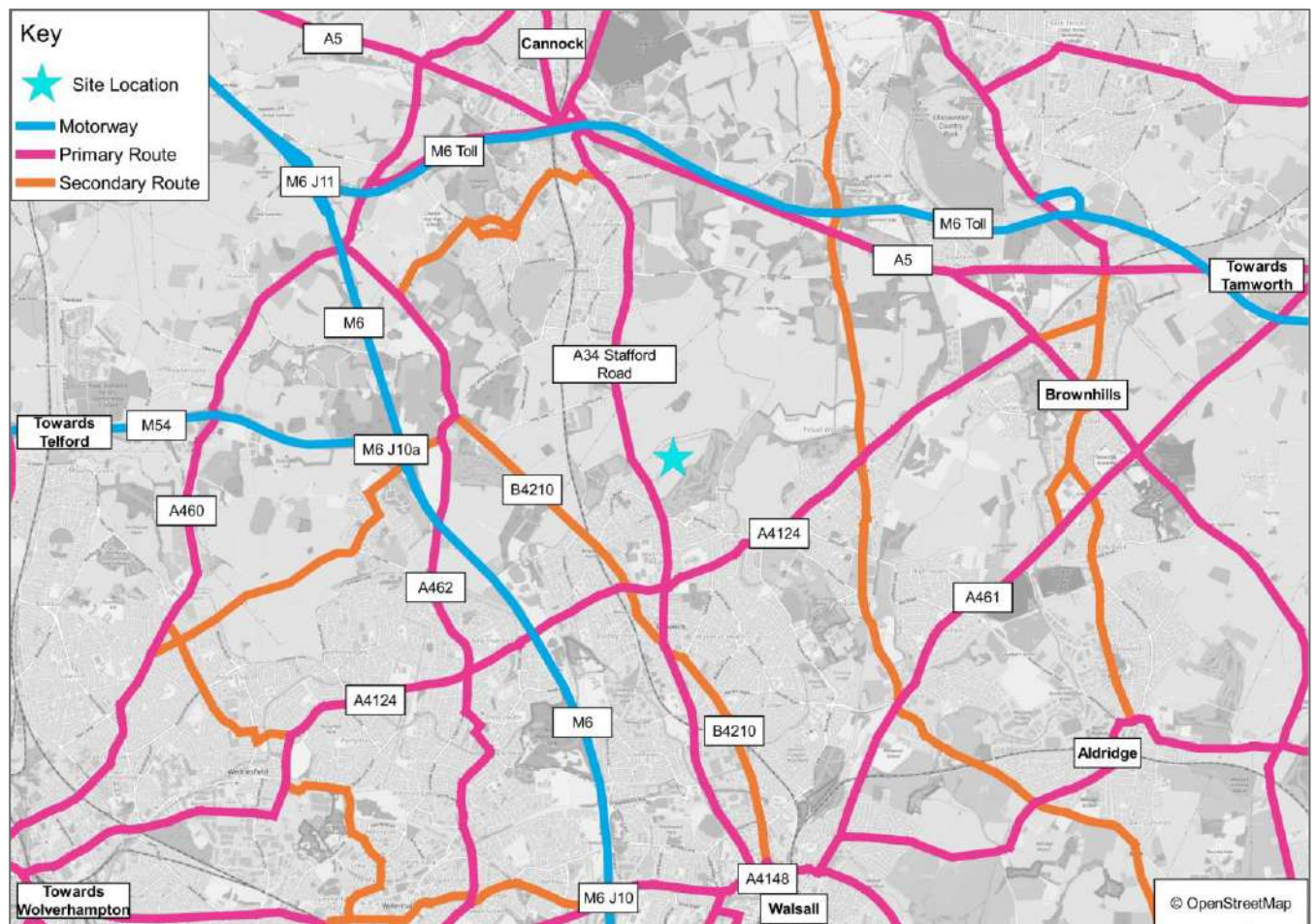
1.1.2 It is proposed that pedestrian and vehicle access to the site would be achieved via Stafford Road. An initial site access strategy is provided in **Appendix A** which shows that a new roundabout and priority access could be introduced to serve the site; this demonstrates that safe and suitable access to the site can be achieved, in line with the National Planning Policy Framework. However, it should be noted that the form and location of these is not fixed at this stage.

- 1.1.3 The site is included within Draft Strategic Allocation Policy WSA4 – Yieldfields Farm and has an estimated capacity of 978 homes based on a net developable area of approximately 24.5 hectares.
- 1.1.4 This Technical Note has been produced to set out the sustainability credentials of the site, the access arrangements as well as the proposed trip generation and distribution and potential impact on the highway network.

2 Site Location

- 2.1.1 The site is bounded to the north by fields with Newtown, Landywood and Cannock beyond in South Staffordshire District. To the east the site is also bounded by fields, to the south by Bloxwich Golf Course, to the west is Turnberry housing estate as well as being the site frontage bounded by Stafford Road.
- 2.1.2 Stafford Road is approximately 7.3 metres wide. The road is street lit and subject to a 30mph speed limit and forms part of a red route. To the north, Stafford Road provides access to Cannock and the M6 Toll and links to the A5. To the south, Stafford Road provides access to Walsall and the A4148 Walsall Ring Road that links to the M6 motorway at junction 10.

Figure 2. Local Highway



3 Sustainable Travel

3.1 Pedestrian Travel

- 3.1.1 The Guidelines for Providing for Journeys on Foot¹ document describes the ‘maximum’, ‘acceptable’ and ‘desirable’ walking distances. It suggests that in terms of commuting, walking to school and recreational journeys; walk

¹ Guidelines for Providing for Journeys on Foot, Chartered Institution of Highways and Transportation

distances up to 2,000 metres can be considered, with the ‘desirable’ and ‘acceptable’ distances being 500 and 1,000 metres respectively.

3.1.2 For non-commuter journeys, the guidance suggests that a walk distance of up to 1,200 metres can be considered, with the ‘desirable’ and ‘acceptable’ distances being 400 metres and 800 metres respectively.

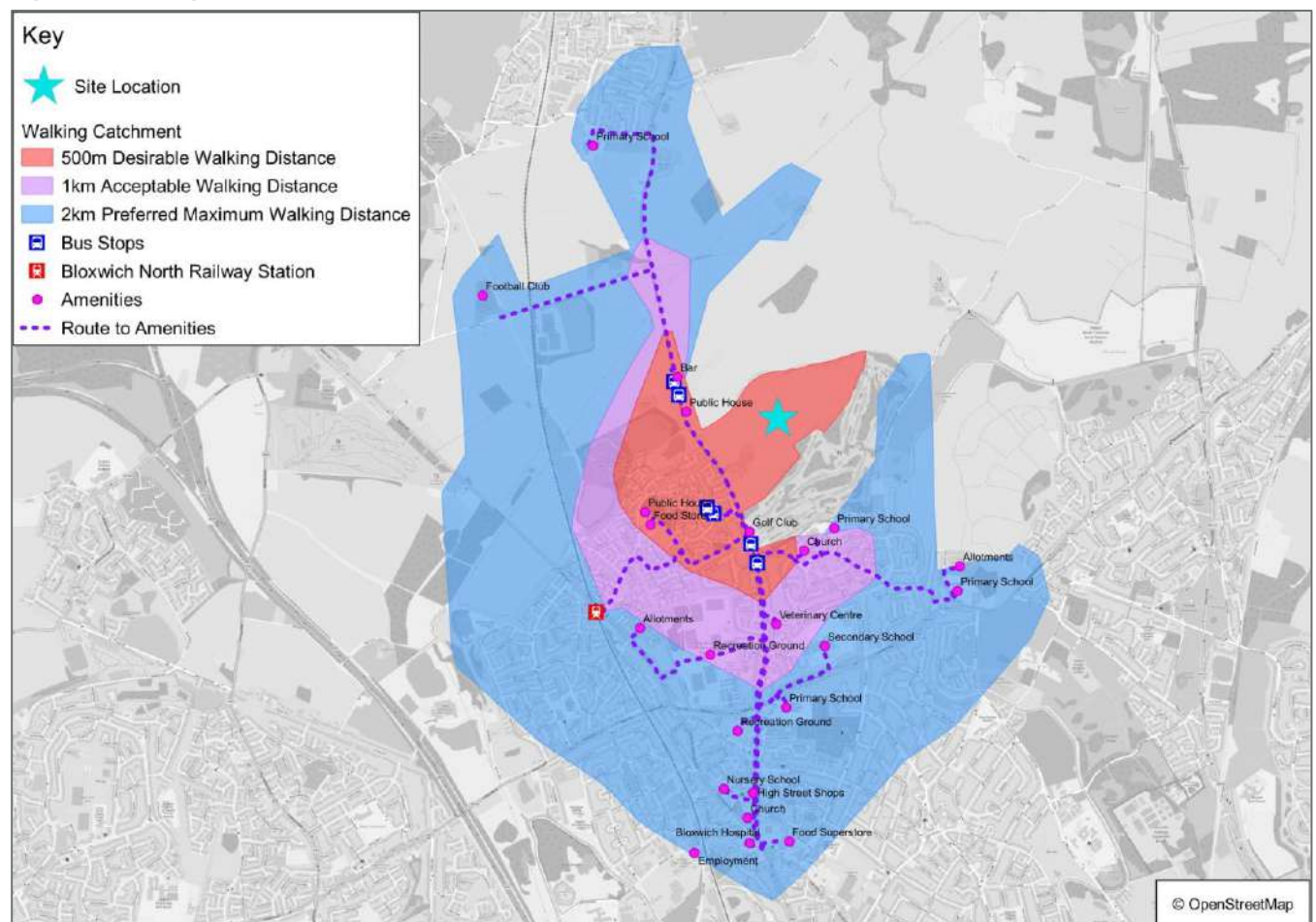
3.1.3 **Table 1** summarises the broad walking journey times that can fall under each category.

Table 1. Walk Journey Distance and Time Threshold

IHT Threshold	Distance (Metres)		Walking Time (Minutes)	
	Commuting, Walking to school and recreation	Other non-commuter journeys	Commuting, Walking to school and recreation	Other non-commuter journeys
Desirable	500	400	6	5
Acceptable	1,000	800	12.5	10
Maximum	2,000	1,200	25	15

3.1.4 **Figure 3** depicts walking catchment from the development site which also includes the ‘desirable’, ‘acceptable’ and ‘preferred maximum’ distances.

Figure 3. Walking Catchment



3.1.5 **Figure 3** and **Table 1** confirms that Bloxwich’s town centre, including the High Street shops are within convenient walking distance of the site, these shops include a Pharmacy, convenience stores, banks and a post office. Other available amenities within the catchment areas include primary and secondary schools, food stores, allotments, employment facilities, Bloxwich North Railway Station, and public houses. It is anticipated that the development at Yieldfields will be supported by on-site and off-site infrastructure, including a new on-site primary school and local

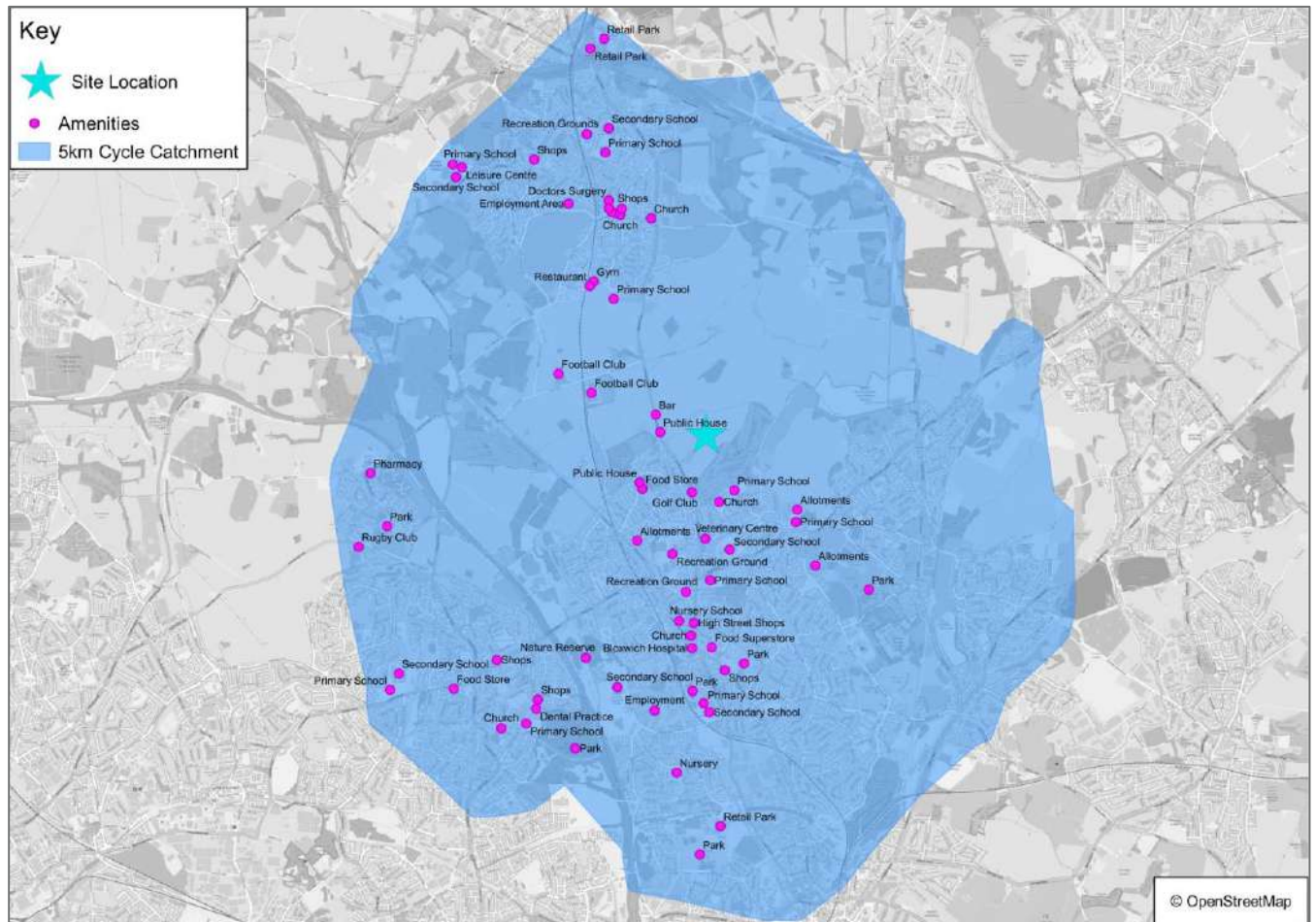
health centre, in addition to a contribution towards improvements for off-site secondary school provision in North Bloxwich.

- 3.1.6 Along the site frontage a footway is provided on the eastern side of Stafford Road. This footway provides access to the bus stops on Stafford Road as well as the residential area to the west of the site. To the south of the site the footways provide access into Bloxwich, whilst to the north this footway continues towards Newtown; the Stafford Road/Turnberry Road junction is signalised and includes refuges that allow pedestrians to cross with traffic safely.
- 3.1.7 A footpath is also present approximately 125m south of the Stafford Road/Turnberry Road junction providing a further, more direct route to Bloxwich North Railway Station through the Turnberry Estate. Alternatively, pedestrians can use the footways provided along Turnberry Road to access this station.
- 3.1.8 A signal-controlled pedestrian crossing is also provided on Stafford Road approximately 240m to the south of the Stafford Road/Turnberry Road junction.

3.2 Cycle Travel

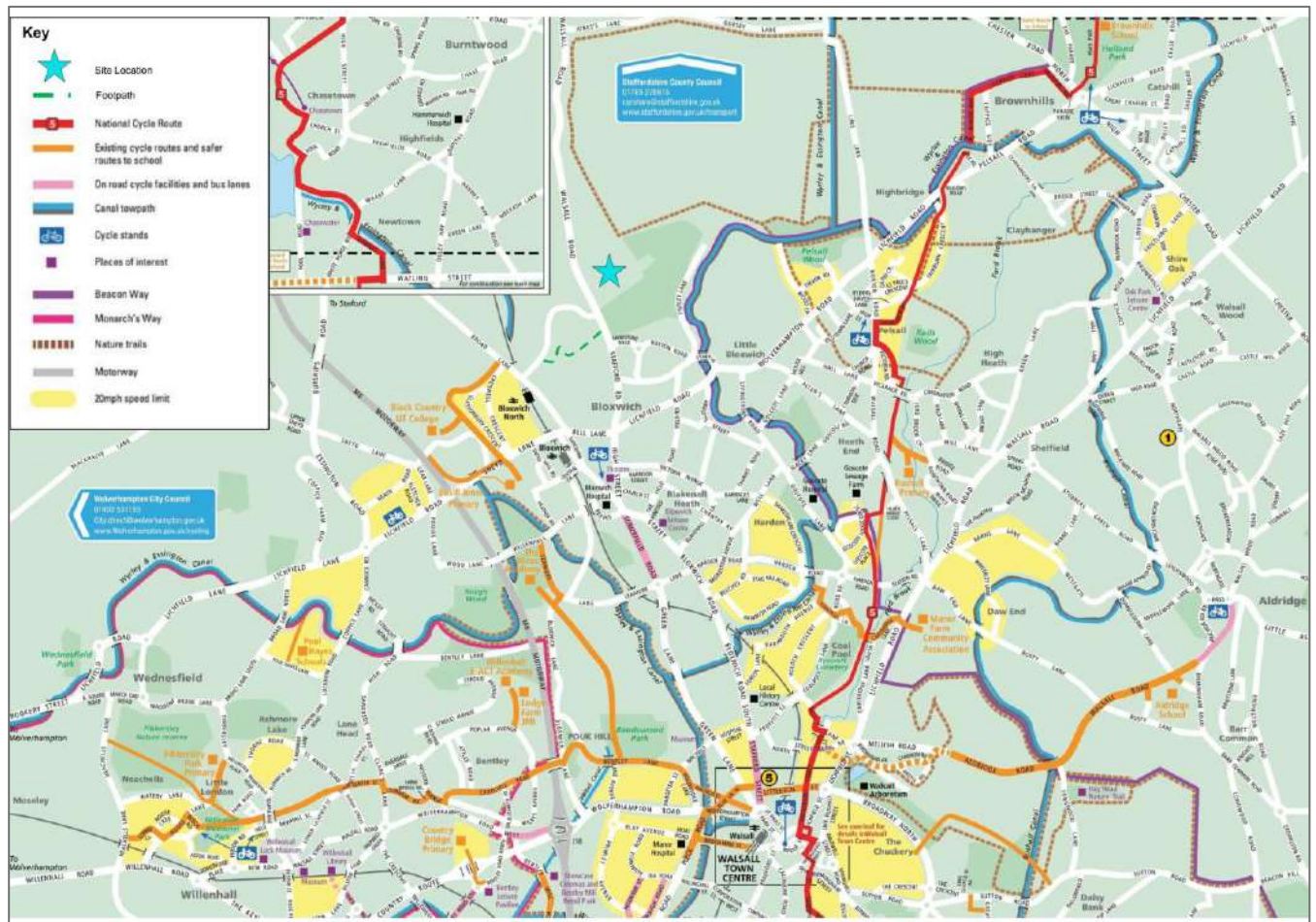
- 3.2.1 Local Transport Note (LTN) 1/04 states that there are limits to the distances generally considered acceptable for cycling. The mean average length for cycling is 4km (2.4 miles), although journeys of up to three times this distance are not uncommon for regular commuters. It is widely considered that cycling has the potential to substitute for short car trips, particularly those under 5km, and form part of a longer multi modal journey by public transport.
- 3.2.2 LTN 1/20 states *“Recent growth of cycling recorded in central London and other towns and cities following programmes of investment have illustrated that there is significant potential for change in travel behaviour and that more people cycle for everyday journeys where acceptable conditions are provided. Two out of every three personal trips are less than five miles in length – an achievable distance to cycle for most people, with many shorter journeys also suitable for walking. For schoolchildren the opportunities are even greater: three quarters of children live within a 15-minute cycle ride of a secondary school, while more than 90% live within a 15-minute walk of a primary school”*. Cycling is therefore an important journey to work mode that has the potential to substitute for short car journeys.
- 3.2.3 **Figure 4** presented the 5km cycle catchment from the site. It shows that all of Bloxwich and surrounding residential and employment areas are within convenient cycling distance of the site. The catchment also extends towards Cannock with both the Orbital and Cannock Gateway retail parks within cycling distance of the site.

Figure 4. Cycle Catchment



- 3.2.4 **Figure 5** includes an extract of the Walsall cycle map. There are no dedicated cycle facilities on Stafford Road. However, to the east of the site the Wyrley and Essington canal towpaths are available for cycle trips to and from the wider West Midlands area providing routes to Walsall to the south and Wolverhampton to the west of the site.
- 3.2.5 As outlined above a cycle connection is also available through the Turnberry Estate providing a more direct route to Bloxwich North Railway Station.
- 3.2.6 In addition, National Cycle Network (NCN) route 5 is also located to the east of the site and forms a long-distance route providing a mixture of on-road and traffic free sections towards Lichfield via Burntwood and Brownhills to the northeast of the site and Smethwick via Walsall to the south of the site.

Figure 5. Walsall Cycle Map Extract



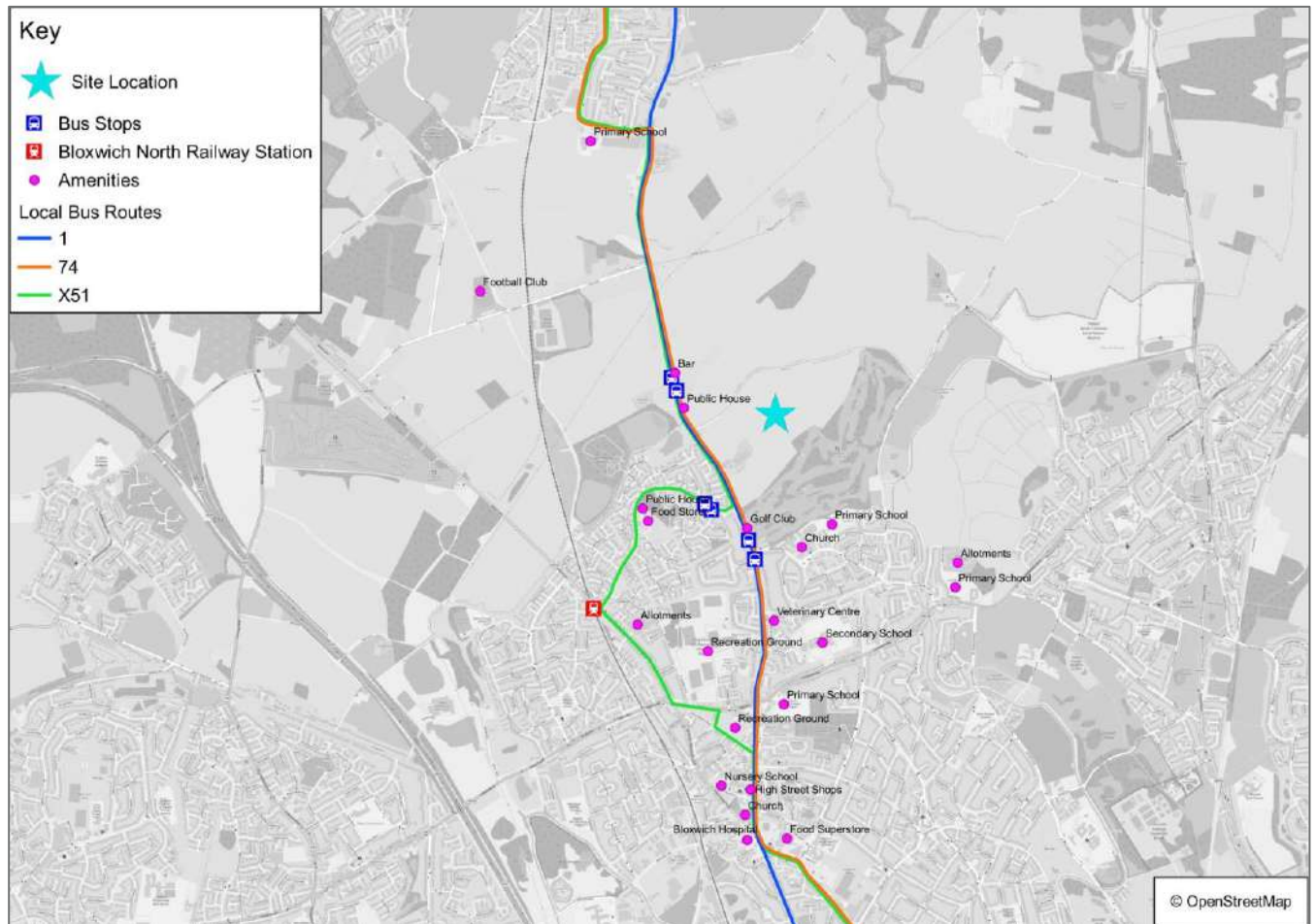
3.2.7 The above demonstrates that the residents of the proposed development could safely and conveniently access key destinations such as Bloxwich Town Centre and Bloxwich North Railway Station as well as further away locations by cycling.

3.3 Bus Travel

3.3.1 The nearest bus stop from the site is located on Turnberry Road approximately 650m (7.5 minute walk) from the centre of the site and this is served by the X51 bus service. Further bus stops are located to the south of the site approximately 750m (9-minute walk) and north approximately 950m (11.5 minute walk) from the centre of the site, which are also served by the X51 service as well as the 1 and 74 service.

3.3.2 **Figure 6** displays the local bus routes passing the site.

Figure 6. Local Bus Routes



3.3.3 **Table 2** provides a summary of the available bus services.

Table 2. Bus Service Summary

Service Number	Route/ Destinations	Weekday Frequency	Saturday Frequency	Sunday Frequency
X51	Birmingham – Cannock via Walsall	20 minutes	30 minutes	30 minutes
1	Walsall - Cannock via Bloxwich	30 minutes	No Service	No Service
74	Stafford – Cannock via Bloxwich	30 minutes	30 minutes	No Service

Note: Timetable information obtained August 2021, First/ Last service based on time service arrives/ departs the nearest bus stop to the development

3.3.4 In summary, a good range of bus services are available within convenient walking distance of the site, which provide a direct link between the site and Bloxwich, Walsall, Stafford, Cannock and Birmingham and the surrounding areas. These buses operate throughout the day which also facilitates commuting into Walsall or Cannock.

3.3.5 There may also be potential to divert/ extend bus services though the site to help facilitate the use of sustainable transport and this opportunity would be considered as part of any future planning application for the site. However, existing service frequencies are sufficient to ensure that bus travel would be an attractive option, with internal routes to provide a direct linkage towards the nearest bus stops, and opportunities to upgrade existing stops, for example with shelters and real time passenger information.

3.4 Rail Travel

3.4.1 Bloxwich North railway station is located approximately 1.8km to the west of the site. Services are operated by West Midlands Railway between Rugeley Trent Valley and Birmingham International via Birmingham New Street, that provides further connects throughout the UK. Example frequencies and journey times of the rail services to key destinations are set out in **Table 3**.

Table 3. Rail Services Summary

Destination	Journey Time	Peak Time Frequency
Cannock	7 minutes	30 minutes
Walsall	8 minutes	40 minutes
Rugeley Trent Valley	20 minutes	30 minutes
Birmingham New Street	30 minutes	40 minutes
Birmingham International	55 minutes	40 minutes

3.4.2 The train station is likely to be a destination for residents and is easily accessible by walking (21-22 minute journey), cycling (5-6 minute journey) and public transport via the X51 bus service (3 minute journey) which passes the site, providing a range of opportunities for multi-modal sustainable travel journeys, including the first and last leg of journeys. These rail services operate at times throughout the day which also facilitate commuting.

3.5 Summary

3.5.1 The above demonstrates that the site is in a sustainable location within walking and cycling distance of the local services and amenities. The site also benefits from nearby bus stops with frequent services to Cannock and Walsall and a nearby railway station with frequent services to Birmingham New Street.

4 Development and Access Proposals

4.1.1 The total developable area for the site is approximately 24.5ha and it is anticipated that the site could be developed for approximately 978 dwellings as outlined in draft policy WSA4 of the draft strategic allocation identified in the emerging Black Country Plan.

4.1.2 It is proposed that pedestrian and vehicle access to the site would be achieved via Stafford Road as shown in the plan in **Appendix A**.

4.1.3 Vehicle access to the site is proposed onto Stafford Road via two new accesses; at this stage the first is proposed as a three-arm roundabout that will also assist in traffic calming on Stafford Road in response to the existing signage and speed cameras on approach to Bloxwich. The second is proposed as a priority 'give way' T-junction. Capacity of the access strategy is dependent on future junction modelling which would be undertaken as part of any future planning application. This may result in the need for the priority access to be amended to include a ghost island right turn lane, which is also considered feasible within highway boundary/the proposed allocation site. At this stage, the access strategy is not fixed and so the form and location may change, but importantly, demonstrates that safe and suitable access to the site can be achieved in line with the NPPF.

4.1.4 Opportunities for improvements will be explored at the Stafford Road/ Turnberry Road junction, to reconfigure the existing three-arm signalised junction to provide dedicated crossings to facilitate active travel connections towards Bloxwich town centre, the railway station and the local bus stops.

4.1.5 As shown on the indicative site access plan, pedestrian access to the site would be achieved via 3m wide shared use path provided adjacent to Stafford Road, connecting with the existing 2m wide footways to the north and south on Stafford Road as well as the Turnberry Estate with improvements to the Stafford Road / Turnberry Road junction to promote connectivity across Stafford Road.

- 4.1.6 Subsequently, adequate access for all modes of travel, including walking, cycling and public transport will be provided, in line with draft policy TRAN1 of the BCP.

5 Trip Generation, Distribution and Assignment

5.1 Introduction

- 5.1.1 To quantify the impact of the proposed development on the local transport system, the number of person trips for all modes of transport that are likely to be generated by the development should be calculated.

5.2 Vehicle Trip Generation

- 5.2.1 To establish the forecast vehicle trip generation for the proposed allocation, vehicle trip rates within the 'C3 – Houses – Privately Owned' category of the TRICS database were examined. This is considered a robust assessment as any development would also include a proportion of affordable housing.
- 5.2.2 All sites located in Greater London and outside of England were deselected. Only those sites classed as 'edge of town' and 'suburban area' were selected to reflect the setting of the proposed allocation site.
- 5.2.3 **Table 4** shows the residential trip rates and trip generation for the proposed development. A copy of the TRICS output is attached at **Appendix B**.

Table 4. Residential Trip Rates and Generation

Time Period	Vehicle Trip Rates (Per Dwelling)			Traffic generation (978 Dwellings)		
	Arrival	Departure	Two-way	Arrival	Departure	Two-way
AM Peak (08:00 – 09:00)	0.141	0.378	0.519	138	370	508
PM Peak (17:00 – 18:00)	0.349	0.161	0.510	341	157	498

- 5.2.4 As shown in **Table 4**, the proposed development could be expected to generate a total of 508 vehicle trips during the AM peak and 498 in the PM peak hour.
- 5.2.5 It should be noted that this is an initial assessment. As such, there are opportunities to significantly reduce the number of vehicle trips associated with the development when accounting for the development being underpinned by Decide & Provide (D&P) principles, with opportunities for internalisation of trips with the primary school / local centre, as well as the proximity of public transport and increased opportunities for home working. A robust Travel Plan will also be implemented at the site to increase the modal share of more sustainable modes.

5.3 Modal Split

- 5.3.1 To provide a more accurate representation of the existing and forecast modal split anticipated at the development site, the Census Journey to Work data for people travel to work within the 'Walsall 006' Middle Super Output Area has been analysed.
- 5.3.2 The method of travel data to work for the 2011 Census has been examined and modal splits calculated, the results are summarised below in **Table 5**.

Table 5. Method of Travel to Work

Method of Travel to Work	Modal Split
Car Driver	65.9%
Bus	14.2%
On Foot	8.2%

Car Passenger	7.4%
Bicycle	1.9%
Train	1.2%
Motorcycle	0.8%
Other	0.4%
Total	100%

5.3.3 **Table 5** indicated that currently 15.4% of trips are made using public transport and 10.1% are walking/ cycling trips.

5.4 Person Trip Generation

5.4.1 The modal splits outlined in **Table 5** have been combined with the vehicle trip generation in **Table 4** to calculate the two-way person trip associated with the proposed development, shown in **Table 6**.

Table 6. Multi-modal Trip Generation

Time Period	AM Peak			PM Peak		
	Arrival	Departure	Two-way	Arrival	Departure	Two-way
Car Driver	138	370	508	341	157	498
Bus	29	79	108	74	33	107
On Foot	17	46	63	42	19	61
Car Passenger	15	42	57	38	18	56
Bicycle	4	11	15	10	5	15
Train	3	7	10	6	3	9
Motorcycle	2	4	6	4	2	6
Other	1	2	3	2	1	3
Total	209	561	770	517	238	755

5.4.2 Overall, it is anticipated that there could be approximately 118 additional two-way trips for public transport in the AM peak hour and 116 in the PM peak hour. There will be an additional 78 two-way trips in the AM peak for people travelling by foot and cycle, with 76 two-way trips in the PM peak.

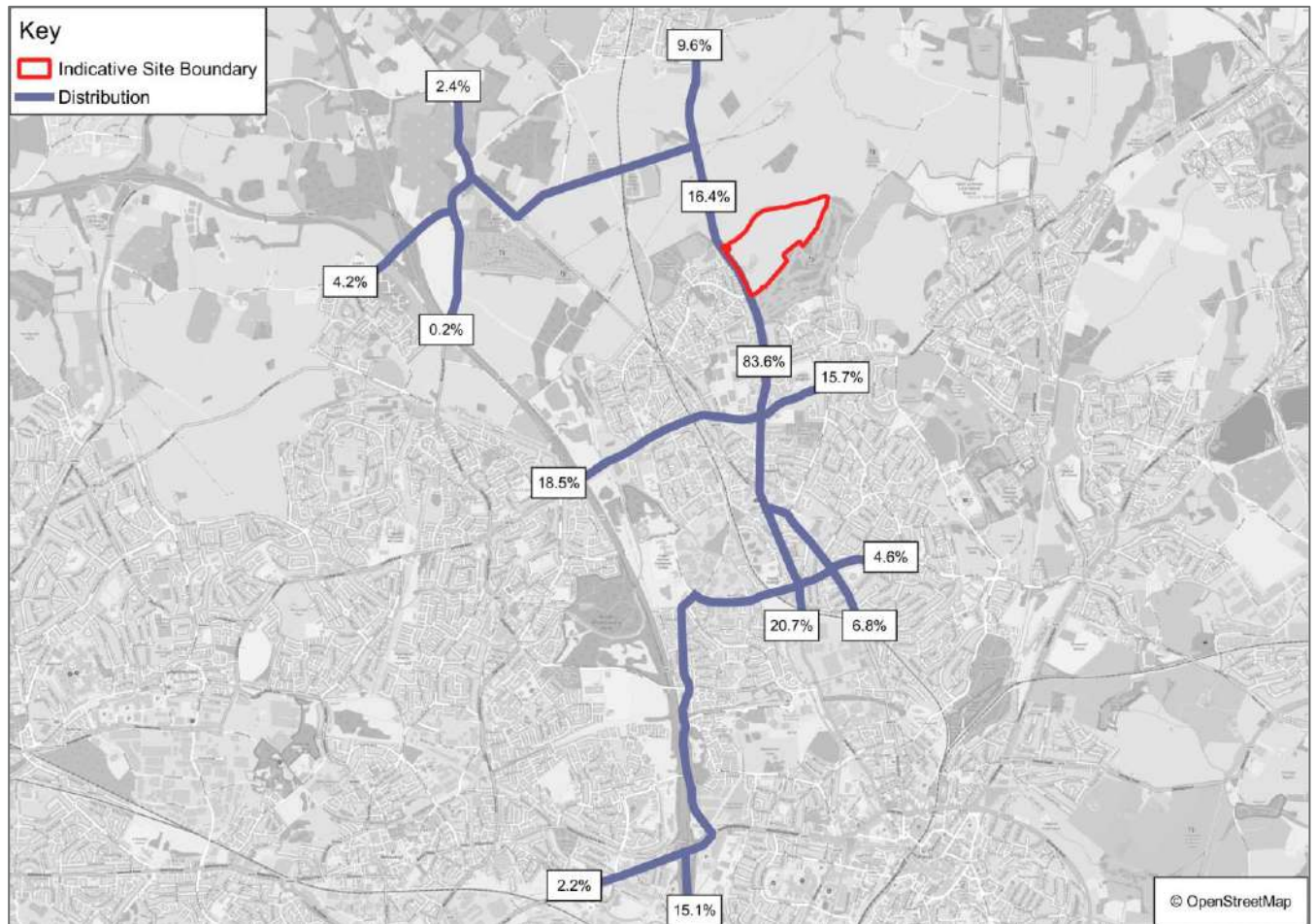
5.4.3 The existing infrastructure and facilities are considered sufficient to accommodate the increased level of users. Increased bus patronage may also provide the financial viability to increase the frequency of bus services close to the site. This would be examined in further detail as part of any future planning application. It should be noted that the above is based on existing travel patterns, however, the development would be underpinned by D&P principles and would look to instil sustainable travel behaviours immediately upon occupation.

5.5 Trip Distribution

5.5.1 The proposed development traffic distribution has been based on the 2011 census 'Method of Travel to Work' data for MSOA 'Walsall 006. The origins of all trips to the area were separated from the data and a percentage demand was derived for all the destinations for vehicle driver trips using the most appropriate route to/from each area.

5.5.2 The indicative distribution of the development traffic is shown in **Figure 7**.

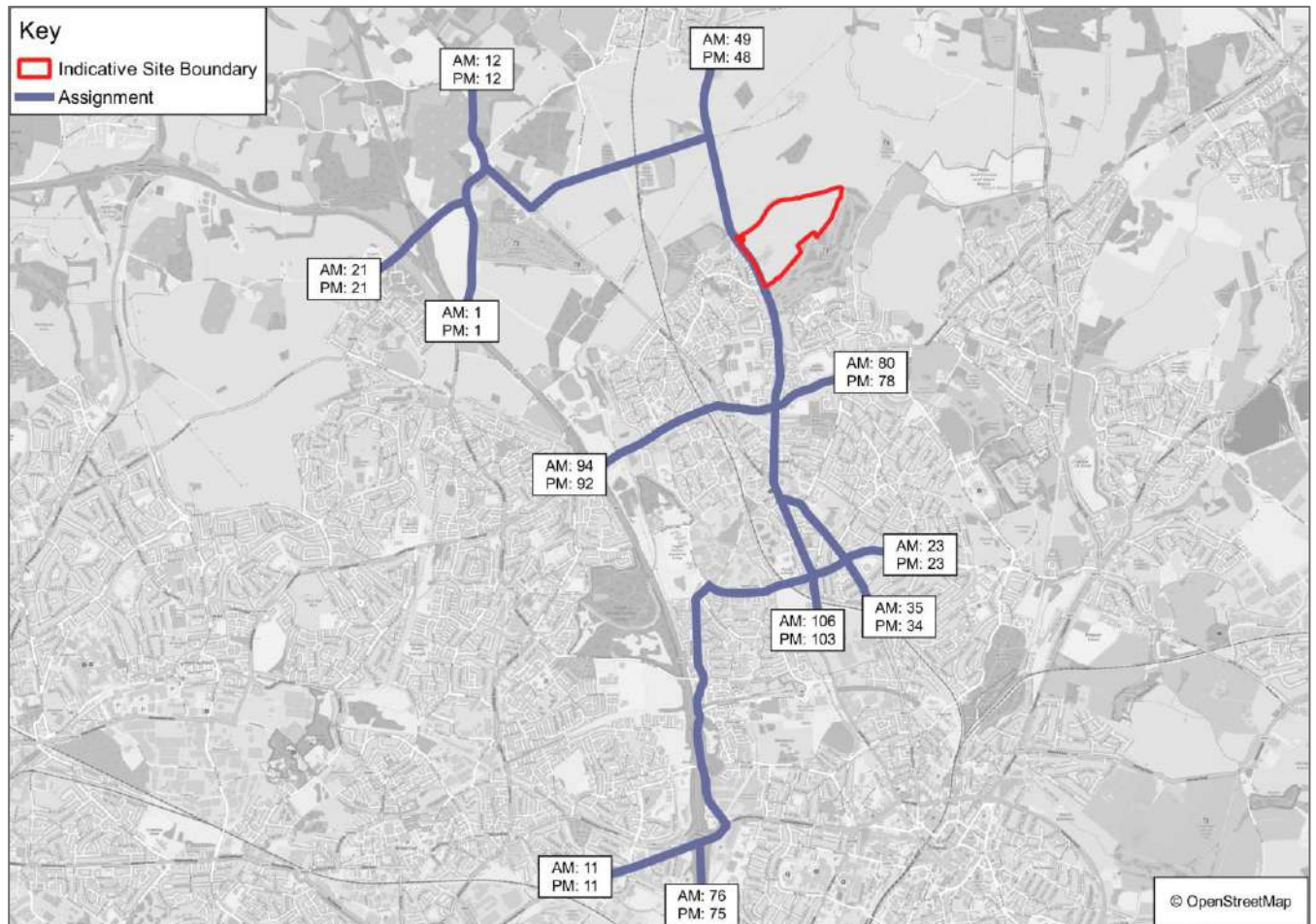
Figure 7. Development Traffic Distribution



5.6 Trip Assignment

5.6.1 The resulting assignment of development traffic is shown in **Figure 8**, and shows that the majority of traffic routes south towards Walsall though the Stafford Road/ Lichfield Road signalised junction.

Figure 8. Development Traffic Assignment (Two-Way Vehicles)



- 5.6.2 Overall, the impact of the development traffic is likely to be constrained primarily to the A34 and A4124 corridors, with the majority of traffic travelling towards Walsall and M6 junction 10. Whilst there is anticipated to be an increase in traffic at a number of location in the vicinity of the site, the increase are not considered to be significant. At the planning application stage detailed assessments of the off-site junctions would be undertaken and appropriate mitigation measures identified as required, in line with draft policy TRAN3 of the BCP.
- 5.6.3 The development will be underpinned by D&P principles, with internal uses incorporated so as to minimise the number of external movements. Furthermore, sustainable modes will be maximised for external movements through improved connectivity towards the railway station and town centre.
- 5.6.4 Should traffic modelling reveal the need for mitigation measures at the above existing signalised junctions, then this will likely primarily form changes to signal timings to improve operational efficiency and alterations to the kerb line / lane positioning to increase stacking distances. There may also be opportunities to incorporate further entry lanes where highway boundary permits. For the Stafford Road roundabout junction, there is opportunity to upgrade this junction to signal control to provide additional capacity.
- 5.6.5 In conclusion, the potential traffic impact of the proposals should not be a barrier to the proposed allocation of the site.

6 Sustainable Travel Strategy

- 6.1.1 The proposed layout of the development will be designed with the overriding philosophy of creating a sustainable development underpinned by D&P principles. By designing streets from the outset to be more pleasant places to be and secure by design with priority for active travel modes, people are more likely to use them for walking and cycling. These measures will assist in reducing the number of vehicle trips generated by the development.

- 6.1.2 To further encourage sustainable travel and to reduce the need for residents to travel the following measures will be considered in the development of the site:
- EV parking & charging infrastructure to reflect future demand and tie into low carbon energy strategy (in line with draft policy TRAN8 of the BCP).
 - Bike hire/share scheme at the site and other key locations
 - Mobility hub, including for example dedicated car club spaces and bicycle maintenance equipment;
 - Enhanced walking and cycle networks along active travel corridors towards Bloxwich North Railway Station and Walsall.
 - Greenways, open space & public space/realm incorporation
 - High quality public transport through/past the site using electric / hybrid vehicles and internal bus facilities including bus shelters with live timetable information
 - Enhancement of bus travel connections to the site through frequency improvements and extension, diversion and/or incorporation of new services.
- 6.1.3 The current parking standards in Walsall are set out within the Walsall Council Parking Strategy (adopted in 2008), and thus it is considered that this SPD should be updated to accord with the requirements of NPPF Paragraph 107 in terms of setting local parking standards. We consider that new parking standards should set out specific requirements for the provision for charging infrastructure for electric vehicles as part of developments.
- 6.1.4 A Travel Plan will also be included as part of any future planning application, which will detail a package of measures to promote sustainable travel to/from the site, in line with draft policy TRAN6 of the BCP, along with associated targets and monitoring programme.

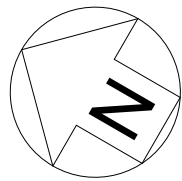
7 Summary and Conclusion

- 7.1.1 Pell Frischmann has been commissioned by L&Q Estates to provide transport planning and highways consultancy services to support the proposed allocation of a site located off of Stafford Road, Bloxwich in the Emerging Black Country Plan.
- 7.1.2 The site is in a sustainable location within walking and cycling distance of the local services and amenities. The site also benefits from close bus stops with frequent services to Cannock and Walsall and a nearby railway station with frequent services to Birmingham New Street.
- 7.1.3 Vehicle access would be provided at two points off Stafford Road; whilst not fixed, at this stage this is proposed via a roundabout and a priority-controlled junction, the design of which would be in accordance with Walsall Councils Design Guidance. Pedestrian and cycle access is proposed via shared use paths adjacent to the site.
- 7.1.4 A trip generation and distribution assessment has been undertaken, which demonstrates the proposed developments traffic impact on the surrounding highway and nearby junctions. It has also been demonstrated that there are various opportunities for non-car-based travel to and from the site, which would further reduce the number of vehicle trips generated by the site.
- 7.1.5 The site will be developed as a sustainable community with the aim of encouraging active travel modes and reducing the number of vehicle trips generated by the development. Further consideration will be given to other measures to encourage sustainable travel including EV parking & charging infrastructure.
- 7.1.6 Overall, it is concluded that the proposed allocation site represents sustainable development, and no transport related issues should preclude delivery of the scheme.

This report is to be regarded as confidential to our Client and is intended for their use only and may not be assigned except in accordance with the contract. Consequently, and in accordance with current practice, any liability to any third party in respect of the whole or any part of its contents is hereby expressly excluded, except to the extent that the report has been assigned in accordance with the contract. Before the report or any part of it is reproduced or referred to in any document, circular or statement and before its contents or the contents of any part of it are disclosed orally to any third party, our written approval as to the form and context of such a publication or disclosure must be obtained.

Report Ref.	105640-PEF-ZZ-XX-RP-TP-000001-TTN_S2_P03 - Transport Technical Note					
File Path	P:\Data\105640 - Yieldsfield Farm Stafford Road Bloxwich\01 - WIP\Documents\Transport Planning\105640-PEF-ZZ-XX-RP-TP-000001-TTN_S2_P02 - Transport Technical Note.docx					
Rev	Suit	Description	Date	Originator	Checker	Approver
S2	P1	First Draft	03/09/2021	JF	LT	TC
S2	P2	Revised Issue	05/09/2021	JF	LT	CH
S2	P3	Final Issue	07/09/2021	JF	LT	CH
Ref. reference. Rev revision. Suit suitability.						

Appendix A Indicative Access Option



2m footway to connect to existing to east of A34 Stafford Road

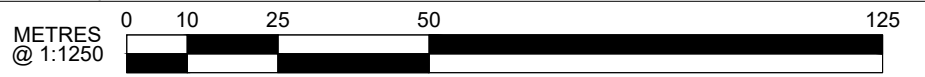
Listed Building

3m shared use path to east of A34 Stafford Road

Opportunities to reconfigure existing three-arm signalised junction to provide crossing facilities and facilitate active travel connections towards Bloxwich North Railway Station

Three-arm roundabout to provide vehicular access to site and assist in calming traffic

Priority 'give way' junction to provide vehicular access to site



P01	Preliminary	JF	CH	CH	07.10.21
REV	DESCRIPTION	DRN	CHK	APP	DATE

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Architect/Client/Contractor
L&Q Estates

Project
**LAND AT YEILDFIELDS
 STAFFORD ROAD, BLOXWICH**

Drawing Title
SITE ACCESS ARRANGEMENTS

Drawing Status				Preliminary	
Drawn	Name	Date	Status Code		
Designed	JF	07.10.21	S2		
Eng Chk	CH	07.10.21	Scale		
Approved	CH	07.10.21	1:1250		
Drawing No.			Revision		
105640 - PEF - ZZ - XX - DR - TP - 000001			P01		

Appendix B TRICS Outputs

Calculation Reference: AUDIT-610805-210826-0808

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 03 - RESIDENTIAL
 Category : A - HOUSES PRIVATELY OWNED
 TOTAL VEHICLES

Selected regions and areas:

02	SOUTH EAST	
	ES EAST SUSSEX	1 days
	HF HERTFORDSHIRE	1 days
	KC KENT	3 days
	SC SURREY	1 days
	WS WEST SUSSEX	4 days
03	SOUTH WEST	
	DV DEVON	1 days
04	EAST ANGLIA	
	NF NORFOLK	4 days
05	EAST MIDLANDS	
	DS DERBYSHIRE	1 days
06	WEST MIDLANDS	
	ST STAFFORDSHIRE	1 days
07	YORKSHIRE & NORTH LINCOLNSHIRE	
	NE NORTH EAST LINCOLNSHIRE	2 days

This section displays the number of survey days per TRICS® sub-region in the selected set

Primary Filtering selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter: No of Dwellings
 Actual Range: 110 to 984 (units:)
 Range Selected by User: 100 to 4334 (units:)

Parking Spaces Range: All Surveys Included

Parking Spaces per Dwelling Range: All Surveys Included

Bedrooms per Dwelling Range: All Surveys Included

Percentage of dwellings privately owned: All Surveys Included

Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/13 to 13/10/20

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

Monday	5 days
Tuesday	5 days
Wednesday	3 days
Thursday	3 days
Friday	3 days

This data displays the number of selected surveys by day of the week.

Selected survey types:

Manual count	17 days
Directional ATC Count	2 days

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines.

Selected Locations:

Edge of Town Centre	1
Suburban Area (PPS6 Out of Centre)	2
Edge of Town	16

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

Secondary Filtering selection:

Use Class:

C3 19 days

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order 2005 has been used for this purpose, which can be found within the Library module of TRICS@.

Population within 500m Range:

All Surveys Included

Population within 1 mile:

1,001 to 5,000	4 days
5,001 to 10,000	4 days
10,001 to 15,000	8 days
15,001 to 20,000	1 days
20,001 to 25,000	2 days

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:

5,001 to 25,000	3 days
25,001 to 50,000	2 days
50,001 to 75,000	3 days
75,001 to 100,000	4 days
125,001 to 250,000	7 days

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

0.6 to 1.0	5 days
1.1 to 1.5	12 days
1.6 to 2.0	2 days

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.

Travel Plan:

Yes	10 days
No	9 days

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

PTAL Rating:

No PTAL Present	19 days
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This data displays the number of selected surveys with PTAL Ratings.

Covid-19 Restrictions	Yes	At least one survey within the selected data set was undertaken at a time of Covid-19 restrictions
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LIST OF SITES relevant to selection parameters

1	DS-03-A-02 RADBOURNE LANE DERBY	MIXED HOUSES	DERBYSHIRE
	Edge of Town Residential Zone Total No of Dwellings: 371 <i>Survey date: TUESDAY 10/07/18</i>		<i>Survey Type: MANUAL</i>
2	DV-03-A-02 MILLHEAD ROAD HONITON	HOUSES & BUNGALOWS	DEVON
	Suburban Area (PPS6 Out of Centre) Residential Zone Total No of Dwellings: 116 <i>Survey date: FRIDAY 25/09/15</i>		<i>Survey Type: MANUAL</i>
3	ES-03-A-03 SHEPHAM LANE POLEGATE	MIXED HOUSES & FLATS	EAST SUSSEX
	Edge of Town Residential Zone Total No of Dwellings: 212 <i>Survey date: MONDAY 11/07/16</i>		<i>Survey Type: MANUAL</i>
4	HF-03-A-03 HARE STREET ROAD BUNTINGFORD	MIXED HOUSES	HERTFORDSHIRE
	Edge of Town Residential Zone Total No of Dwellings: 160 <i>Survey date: MONDAY 08/07/19</i>		<i>Survey Type: MANUAL</i>
5	KC-03-A-04 KILN BARN ROAD AYLESFORD DITTON	SEMI -DETACHED & TERRACED	KENT
	Edge of Town Residential Zone Total No of Dwellings: 110 <i>Survey date: FRIDAY 22/09/17</i>		<i>Survey Type: MANUAL</i>
6	KC-03-A-06 MARGATE ROAD HERNE BAY	MIXED HOUSES & FLATS	KENT
	Suburban Area (PPS6 Out of Centre) Residential Zone Total No of Dwellings: 363 <i>Survey date: WEDNESDAY 27/09/17</i>		<i>Survey Type: MANUAL</i>
7	KC-03-A-07 RECVLVER ROAD HERNE BAY	MIXED HOUSES	KENT
	Edge of Town Residential Zone Total No of Dwellings: 288 <i>Survey date: WEDNESDAY 27/09/17</i>		<i>Survey Type: MANUAL</i>
8	NE-03-A-02 HANOVER WALK SCUNTHORPE	SEMI DETACHED & DETACHED	NORTH EAST LINCOLNSHIRE
	Edge of Town No Sub Category Total No of Dwellings: 432 <i>Survey date: MONDAY 12/05/14</i>		<i>Survey Type: MANUAL</i>

LIST OF SITES relevant to selection parameters (Cont.)

9	NE-03-A-03 STATION ROAD SCUNTHORPE	PRIVATE HOUSES		NORTH EAST LINCOLNSHIRE
	Edge of Town Centre Residential Zone Total No of Dwellings:		180	
	Survey date: <i>TUESDAY</i>		<i>20/05/14</i>	<i>Survey Type: MANUAL</i>
10	NF-03-A-06 BEAUFORT WAY GREAT YARMOUTH BRADWELL	MIXED HOUSES		NORFOLK
	Edge of Town Residential Zone Total No of Dwellings:		275	
	Survey date: <i>MONDAY</i>		<i>23/09/19</i>	<i>Survey Type: MANUAL</i>
11	NF-03-A-07 SILFIELD ROAD WYMONDHAM	MIXED HOUSES & FLATS		NORFOLK
	Edge of Town Out of Town Total No of Dwellings:		297	
	Survey date: <i>FRIDAY</i>		<i>20/09/19</i>	<i>Survey Type: DIRECTIONAL ATC COUNT</i>
12	NF-03-A-16 NORWICH COMMON WYMONDHAM	MIXED HOUSES & FLATS		NORFOLK
	Edge of Town Residential Zone Total No of Dwellings:		138	
	Survey date: <i>TUESDAY</i>		<i>20/10/15</i>	<i>Survey Type: DIRECTIONAL ATC COUNT</i>
13	NF-03-A-22 ROUND HOUSE WAY NORWICH CRINGLEFORD	MIXED HOUSES & FLATS		NORFOLK
	Edge of Town Residential Zone Total No of Dwellings:		984	
	Survey date: <i>TUESDAY</i>		<i>13/10/20</i>	<i>Survey Type: MANUAL</i>
14	SC-03-A-05 REIGATE ROAD HORLEY	MIXED HOUSES		SURREY
	Edge of Town Residential Zone Total No of Dwellings:		207	
	Survey date: <i>MONDAY</i>		<i>01/04/19</i>	<i>Survey Type: MANUAL</i>
15	ST-03-A-07 BEACONSIDE STAFFORD MARSTON GATE	DETACHED & SEMI-DETACHED		STAFFORDSHIRE
	Edge of Town Residential Zone Total No of Dwellings:		248	
	Survey date: <i>WEDNESDAY</i>		<i>22/11/17</i>	<i>Survey Type: MANUAL</i>
16	WS-03-A-04 HILLS FARM LANE HORSHAM BROADBRIDGE HEATH	MIXED HOUSES		WEST SUSSEX
	Edge of Town Residential Zone Total No of Dwellings:		151	
	Survey date: <i>THURSDAY</i>		<i>11/12/14</i>	<i>Survey Type: MANUAL</i>

LIST OF SITES relevant to selection parameters (Cont.)

17	WS-03-A-08	MIXED HOUSES	WEST SUSSEX
	ROUNDSTONE LANE ANGMERING		
	Edge of Town Residential Zone		
	Total No of Dwellings:	180	
	Survey date: THURSDAY	19/04/18	Survey Type: MANUAL
18	WS-03-A-09	MIXED HOUSES & FLATS	WEST SUSSEX
	LITTLEHAMPTON ROAD WORTHING WEST DURRINGTON		
	Edge of Town Residential Zone		
	Total No of Dwellings:	197	
	Survey date: THURSDAY	05/07/18	Survey Type: MANUAL
19	WS-03-A-11	MIXED HOUSES	WEST SUSSEX
	ELLIS ROAD WEST HORSHAM S BROADBRIDGE HEATH		
	Edge of Town Residential Zone		
	Total No of Dwellings:	918	
	Survey date: TUESDAY	02/04/19	Survey Type: MANUAL

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

MANUALLY DESELECTED SITES

Site Ref	Reason for Deselection
ES-03-A-04	Low Trip Rates

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

TOTAL VEHICLES

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	19	307	0.077	19	307	0.305	19	307	0.382
08:00 - 09:00	19	307	0.141	19	307	0.378	19	307	0.519
09:00 - 10:00	19	307	0.134	19	307	0.160	19	307	0.294
10:00 - 11:00	19	307	0.113	19	307	0.138	19	307	0.251
11:00 - 12:00	19	307	0.119	19	307	0.128	19	307	0.247
12:00 - 13:00	19	307	0.141	19	307	0.139	19	307	0.280
13:00 - 14:00	19	307	0.144	19	307	0.138	19	307	0.282
14:00 - 15:00	19	307	0.160	19	307	0.179	19	307	0.339
15:00 - 16:00	19	307	0.249	19	307	0.174	19	307	0.423
16:00 - 17:00	19	307	0.275	19	307	0.164	19	307	0.439
17:00 - 18:00	19	307	0.349	19	307	0.161	19	307	0.510
18:00 - 19:00	19	307	0.297	19	307	0.177	19	307	0.474
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			2.199			2.241			4.440

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: $COUNT/TRP*FACT$. Trip rates are then rounded to 3 decimal places.

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Parameter summary

Trip rate parameter range selected:	110 - 984 (units:)
Survey date range:	01/01/13 - 13/10/20
Number of weekdays (Monday-Friday):	23
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	8
Surveys manually removed from selection:	1

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

Appendix E Green Belt Appraisal

Appendix F Sustainability Appraisal Review

Land at Yieldfields, Bloxwich

**Review of the Sustainability Appraisal supporting the Regulation 19
Publication Draft South Staffordshire Council Local Plan**

December 2022

Land at Yieldfields, Bloxwich

Review of the Sustainability Appraisal supporting the Regulation 19 Publication Draft South Staffordshire Council Local Plan

Prepared on behalf of:

L&Q Estates

Project Ref:	26036/A5/Reg19SA	
Status:	Draft	Final
Issue/Rev:	01	02
Date:	December 2022	
Prepared by:	CM	
Checked by:	LW	

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1.0 Introduction

- 1.1 This report presents a review of the Sustainability Appraisal (SA) process supporting the South Staffordshire Local Plan Review (SSLPR), which is at Regulation 19 stageⁱ. There are six parts to the SSLPR, the first sets out the context and development strategy which contains the planning strategy for growth in South Staffordshire from 2019 – 2039. The second part is the site allocations document which contains allocation policies for the sites to deliver the strategy. The third part sets out policy in relation to housing mix and density, design and space standards and promoting successful and sustainable communities. The fourth part sets out economic policy, focusing on building a strong local economy and delivering community services, facilities and infrastructure. The fifth parts set out policy to protect the natural and built environment. Finally, the sixth part sets out how the SSLPR will be monitored.
- 1.2 The review has focussed on the SA (which incorporates Strategic Environmental Assessment (SEA)) of the Regulation 19 SSLPR (herein referred to as 'the 2022 Reg 19 SA'), prepared by Lepus Consulting Ltd on behalf of South Staffordshire District Council (SSDC) in October 2022ⁱⁱ. The 2022 Reg 19 SA has been published for consultation as part of the evidence base supporting the SSLPR. Whilst the review has focused on the latest SA report, reference has been made to earlier reports where necessary to give a view on the adequacy of the whole iterative process.
- 1.3 SSDC published the SA Scoping Report in November 2017ⁱⁱⁱ (herein referred to as the 2017 SA Scoping Report). Between November and December 2017, the content of the SA Scoping Report was consulted on with Historic England, Natural England and the Environment Agency and other relevant bodies. Subsequently, the 2017 SA Scoping Report was revised following consideration of the comments received and re-issued to SSDC in 2018.
- 1.4 The Regulation 18 (I) Issues and Options SA Report^{iv} was published by SSDC in September 2018 alongside the SSLPR Issues and Options document and underwent consultation between 8th October to 30th November 2018. The Regulation 18 (I) Issues and Options SA Report assessed five options for levels of residential growth, two options for Gypsy and Traveller growth, three options for employment growth, six options for residential distribution, four options for employment distribution and 34 options for policies to be included in the SSLPR.
- 1.5 SSDC published the Regulation 18 (II) Spatial Housing Strategy and Infrastructure Delivery SA Report^v in August 2019 alongside the SSLPR Spatial Housing Strategy and Infrastructure Delivery document (consultation period: 17th October to 12th December 2019). This set out the appraisal of seven spatial options for the distribution of new housing growth in the Plan area.

- 1.6 The Regulation 18 (III) Preferred Options SA Report (herein referred to as the 2021 Reg 18 (III) SA)^{vi} was issued for consultation between 1st November to 13th December 2021 and included an assessment of 40 draft Development Management (DM) 'direction of travel' policies, 11 draft strategic policies and 317 reasonable alternative sites.
- 1.7 The latest stage of this process is the Regulation 19 version of the SSLPR which SSDC issued for consultation between 11th November to Friday 23rd December 2022. The accompanying Regulation 19 SA Report has been prepared to present full details of the SA process and inform SSDC's preparation of the SSLPR. It identifies the likely significant effects of all reasonable options within the Regulation 19 Plan.
- 1.8 The final SA report will be submitted with the submission version of the SSLPR to the Secretary of State for Examination In Public.
- 1.9 Barton Willmore, now Stantec undertook a review of the 2021 Reg 18 (III) SA ^{vii}. Our response in terms of whether the comments raised have been addressed, or whether further clarification is required, is outlined in later sections of this report. The full SA review is included at Appendix 1 and focuses on the areas we felt needed more explanation and detail at the Regulation 18 (III) stage. It uses a 'traffic light' scoring system to identify areas that are at risk of challenge and do not meet the requirements (red), areas that would benefit from improvement (amber) and those elements of the SA process that are considered to fully comply with the requirements (green). In addition, a site appraisal of Land at Yieldfields, Bloxwich was undertaken against the SA framework as part of the 2021 Reg 18 (III) SA.

2.0 Review of the 2022 Reg 19 SA

Purpose of Review

- 2.1 A review of the SA documents has been undertaken against the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (the "SEA Regulations") and Section 19 of the Planning and Compulsory Purchase Act 2004 (the "Act"), which sets out requirements for SA. SA is a complex and legalistic process and should be undertaken iteratively, alongside the preparation of the Plan. SEA is also a statutory assessment process, originally required under the European SEA Directive, transposed in the UK by the SEA Regulations and amended by the Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI 2018/1232) and the Environmental Assessment of Plans and Programmes (Amendment) Regulations 2020 (SI 2020/1531). As set out in the explanatory Memorandum accompanying the Brexit amendments, they are necessary to ensure that the law functions correctly following the UK's exit from the EU. No substantive changes were made by this instrument to the way the SEA regime currently operates. Therefore, the SEA Regulations remain in force.
- 2.2 A Local Plan must be prepared in accordance with Section 39 of the Act "*with the objective of contributing to the achievement of sustainable development*". It should therefore be informed by the SA process, which itself must comply with the SEA Regulations.

Barton Willmore, now Stantec undertook a review of the 2021 Reg 18 (III) SA. The full review of the SA process which includes the 2022 Reg 19 SA is presented at Appendix 1. This review has sought to focus on the areas we felt needed more explanation and detail at the Regulation 18 (III) stage and identify whether these comments have been addressed in the 2022 Reg 19 SA and if there are any areas of the SA that would benefit from further focus or clarity in order to ensure that the Plan is determined as sound at Examination. As above whilst the review has focused on the 2022 Reg 19 SA, reference has been made to earlier reports where necessary to give a view on the adequacy of the whole iterative SA process.

Review Summary

- 2.3 Barton Willmore, now Stantec's comments made during the review of the Regulation 18 (III) SA report are shown in Table 2.1 and 2.2 below, alongside discussion on whether we agree that our comments have been addressed or not within the 2022 Reg 19 SA and this is reflected by the compliance review at Appendix 1. Table 2.1 focuses on the areas of major deficiency, and Table 2.2 focuses on the areas that would benefit from additional consideration.

Table 2.1 Identified areas of major deficiency in the Regulation 18 (III) SA and incorporation into 2022 Reg 19 SA

Areas of the Regulation 18 (III) SA Identified as Being at Greatest Risk of Challenge	Incorporation into the 2022 Reg 19 SA
<p>Likely significant effects on the environment (cumulative effects) - The 2021 Reg 18 (III) SA does not address cumulative effects and does not consider how each of the SA Objectives might interact with one another. The 2021 Reg 18 (III) SA should include a separate section setting out the methodology used to determine cumulative effects, which would create a more robust and transparent assessment. It is unclear whether/how cumulative effects have been incorporated into the assessment (including topic-specific cumulative effects). The consideration of cumulative effects has not been addressed properly through the SA process, which raises the question as to whether this can reasonably be used as a reason for the rejection of a site, for example in relation to cumulative effects of development on the highway network. It is considered a major deficiency that the cumulative effects have not been considered and sustainability issues have not been thoroughly tested through the SA process to ensure that proposals support balanced growth and do not individually or cumulatively lead to harmful impacts. The potential cumulative effects of the Plan, including the site alternatives, should be considered prior to the Regulation 19 Stage.</p>	<p>Partially addressed. Cumulative effects are summarised in Chapter 16 of the 2022 Reg 19 SA. Within the main body of the 2022 Reg 19 SA Report, there is scant mention of synergistic, cumulative and in-combination effects per topic. See comments to Questions 6 and 8 of the SA compliance review at Appendix 1.</p>
<p>Monitoring - There is no section on monitoring significant effects included. The 2021 Reg 18 (III) SA should identify the trends and monitoring indicators for each of the SA Objectives used in the SA process that will be used to monitor change over time from the baseline conditions, that may occur as a result of the Plan. The 2021 Reg 18 (III) SA should explain that post adoption of the plan, its actual impacts will be monitored to make sure that unexpected effects are identified and dealt with and should set out suggested monitoring indicators for each of the SA Objectives used in this SA process and suggest the frequencies/ timeframes for monitoring. The measures should also monitor the implementation of SA mitigation measures, for instance new landscaping or green infrastructure, thereby identifying positive as well as negative effects. This should be developed throughout the SA process and therefore should be rectified before the updated SA report is published for consultation with the Draft Plan at Regulation 19 stage.</p>	<p>The 2022 Reg 19 SA includes a section on monitoring significant effects. See comments to Question 9 of the SA compliance review at Appendix 1.</p>

Table 2.2 Identified areas requiring additional consideration in the Regulation 18 (III) SA and incorporation into the 2022 Reg 19 SA

Areas of the Regulation 18 (III) SA Identified as Requiring Additional Consideration	Incorporation into the 2022 Reg 19 SA
<p>Relevant plans and programmes – None of the subsequent SAs prepared since the 2017 SA Scoping Report, including the 2021 Reg 18 (III) SA, include an updated review of the relevant international and national plans, policies and programmes. This information should be updated in the SA accompanying the Regulation 19 Plan following on from the review undertaken in the 2017 SA Scoping Report to ensure it remains up to date and valid. This is important as a number of relevant policy and legislation changes have occurred since 2017. Given that SA should be an iterative process, the 2021 Reg 18 (III) SA should summarise/highlight the significant policy changes that have taken place since the 2017 SA Scoping Report was published (such as the EU Withdrawal Act, July 2021 NPPF and the Environment Act). Consideration should also be given to whether any aspect of the SA Framework required updating as a result. The above is important given that the SSLPR and the SA should not be prepared in isolation and will be influenced by other plans, policies and programmes. The adopted plan needs to be in line with broader sustainability objectives established at international and national levels and relevant environmental protection legislation.</p>	<p>Partially addressed. See comments for Question 1 of the SA compliance review at Appendix 1.</p>
<p>Existing environment – The baseline data review has not been thoroughly updated since it was published in the SA Scoping Report in 2017. The 2021 Reg 18 (III) SA should summarise the key sustainability issues for South Staffordshire and, perhaps in an Appendix, set out the detailed policy context, baseline conditions, and sustainability issues (including their likely evolution without the SSLPR) for each SA environmental topic area. The 2021 Reg 18 (III) SA should update the baseline using the most recently published information and should discuss whether there were any changes in the overall trends identified previously and whether the SA Objectives were affected by this. This would help to reinforce the iterative nature of the SA process. Several important developments have occurred since 2017 including the COVID-19 pandemic and resulting recession and lifestyle changes including a rise in unemployment, changes in consumer behaviour and spending patterns, an increased prevalence of home working and less travel. The Government has also published a 10-point plan for a Green Recovery, which should also be considered in the SA. The urgency of the climate and biodiversity emergencies should be acknowledged given recent policy, legislation and progress reports (such as the recent Sixth Assessment Report published by the Intergovernmental Panel on Climate Change (IPCC)).</p>	<p>Partially addressed. See comments for Question 2 of the SA compliance review at Appendix 1.</p>
<p>Existing environment (HRA) - The 2021 Reg 18 (III) SA states that a HRA will be completed alongside the draft SSLPR and that the findings of the HRA will inform the SA, however there is little mention of it. The 2021 Reg 18 (III) SA concludes that at this stage, the potential effects of the development of the reasonable alternative sites on Special Areas of Conservation (SACs) are uncertain but that the findings of the HRA will be fully integrated into the SA process once this report becomes available. It would be helpful to understand and note in the 2021 Reg 18 (III) SA the timescales for</p>	<p>Partially addressed. See comments to Question 4 of the SA compliance review at Appendix 1.</p> <p>It is stated that the 'evolving outputs' of the HRA have informed the 2022 Reg 19 SA. The</p>

Areas of the Regulation 18 (III) SA Identified as Requiring Additional Consideration	Incorporation into the 2022 Reg 19 SA
<p>the preparation of the HRA and where the document will be available. Any preliminary work on the HRA should be included within the assessments. SA Objective 5 Pollution and Waste which includes impacts on Air Quality should make reference to any known nitrogen deposition / dust issues in relation to European sites of importance including Cannock Chase SAC and cross reference the need for HRA to determine impacts and mitigation in more detail. The findings of the HRA should inform and be incorporated into the 2021 Reg 18 (III) SA before the Regulation 19 consultation, particularly given the requirements of the Regulations for the HRA to be undertaken in parallel to the SA. Briefly outlining the conclusions of the HRA would give more meaning to the assessment of ecological effects, particularly when assessing the alternative site options and the decisions made and would make the argument that the findings have been incorporated into the SA more robust. There is no evidence that cumulative effects have been assessed in relation to European sites in the 2021 Reg 18 (III) SA, which will be the case for in-combination effects in the HRA, for legal compliance.</p>	<p>SA states that there is an emerging HRA to support the publication version of the LPR, however, the now complete HRA is in fact available on the Local Plan Review Evidence Base. The findings of the HRA and Appropriate Assessment are fully reflected within the HRA report to support the Regulation 19 consultation, although not explicitly detailed within the SA itself. Given the need for assessments to be coordinated, it would be helpful to have more information within the 2022 Reg 19 SA from the HRA and Appropriate Assessment undertaken for the Local Plan, to ascertain how the HRA has influenced the SA assessments (it is unclear how the HRA has influenced the SA assessments).</p>
<p>Reasonable alternatives – The 2021 Reg 18 (III) SA could better outline the process behind which the seven spatial options in the Spatial Housing Strategy and Infrastructure Delivery SA Report were developed from the growth/distribution options presented in the Issues and Options SA Report. In addition, the 2021 Reg 18 (III) SA does not explain the process of the selection of reasonable alternatives in terms of giving references to the sources that the 317 sites selected for assessment were derived from. The 2021 Reg 18 (III) SA should detail the reasons that sites were filtered out at the initial first stage assessment and references should be given to the evidence base supporting alternatives (e.g. Call for Sites). The 2021 Reg 18 (III) SA should detail the source of the sites set out in Appendix F, for transparency. There are no equivalent tables for the selection/rejection of policy alternatives. The 2021 Reg 18 (III) SA should provide justification for the selection of the preferred policies in light of the reasonable alternatives identified and appraised and should also note where no reasonable alternatives were identified.</p>	<p>Not addressed. See comments for Question 8 of the compliance review at Appendix 1.</p> <p>The 2022 Reg 19 SA could better outline the process behind which the seven spatial options in the Spatial Housing Strategy and Infrastructure Delivery SA were developed from the growth/distribution options presented in the Issues and Options SA Report, given that the process should be iterative. The 2022 Reg 19 SA does not explain the process of the selection of the reasonable alternatives in terms of giving references to the sources that the 317(+58) sites selected for assessment were derived from, which could include consultation with statutory consultees, stakeholders and the general public in response to consultation events as well as through Call for Sites / SHELAA or on an ad-hoc basis. The SA</p>

Areas of the Regulation 18 (III) SA Identified as Requiring Additional Consideration	Incorporation into the 2022 Reg 19 SA
	<p>should detail the reasons that sites were filtered out at the initial first stage assessment and references should be given to the evidence base supporting alternatives (e.g., Call for Sites).</p> <p>Appendix H of the 2022 Reg 19 SA sets out the outline reasons for selection and rejection of all reasonable alternative sites considered throughout the SA process, provided by SSDC. The 2022 Reg 19 SA should detail the source of these sites.</p> <p>There are no equivalent tables for the selection/rejection of policy alternatives.</p>
<p>Reasonable alternatives – It would be helpful to outline whether any options submitted to the Council in the assessment of initial options identified during the early phases of the development of the SSLPR, such as through spatial / growth assessments, were excluded and not considered to be reasonable alternatives at this stage in the Plan-making process and not taken forward and the reasoning behind this, particularly if this was due to sustainability reasons or not. It would be helpful if the 2021 Reg 18 (III) SA outlined whether the SA team were involved in this process early on, perhaps via workshops, reviews of the alternatives, and input into giving reasons for why other options were considered to be not reasonable. The 2021 Reg 18 (III) SA should outline any initial high-level appraisal that may have been undertaken of the sites, for example at the initial first stage assessment, based on designations and/or subjective assessment and explain whether the considered list of alternatives was initially reviewed by the SA team to ensure that the relevant high level, key factors from the SA were being considered and refine the alternatives prior to an SA being carried out of the initial alternatives. If any site visits and desk-based research were undertaken using existing information this should also be outlined.</p>	<p>Not addressed. See comments to Question 8 of the SA compliance review in Appendix 1.</p> <p>The 2022 Reg 19 SA should explain the selection of the reasonable site and policy options from those initially considered and appraised and provide the Council’s justification for the exclusion of previous options and the decisions made. It would be helpful if the SA outlined whether the SA team were involved in this process early on, giving reasons why other options were considered to be not reasonable. The 2022 Reg 19 SA should include any collaboration that the SA team had with the SSLPR team and the degree to which they inputted to refining options to be included in the next SSLPR consultation and to be tested through SA.</p>

Areas of the Regulation 18 (III) SA Identified as Requiring Additional Consideration	Incorporation into the 2022 Reg 19 SA
<p>Reasonable alternatives – It is unclear why the scores in the Spatial Housing Strategy and Infrastructure Delivery SA Report vary for Options G and F for SA Objective 12, given that Option F has a greater focus on providing housing in proximity to existing development and employment opportunities. For example, at Bloxwich, Landywood, Shortheath, Ashmore, Wednesfield (and the University of Wolverhampton), the Hilton Main Industrial Estate to the south of Featherstone and the M54, as well as providing high connectivity (including via public transport) from these to Willenhall, Walsall and Wednesbury further to the south, all which enable access to a wide range of jobs and large commercial and industrial sites, more so than the more rural areas proposed for development in Option G. Option F would provide more development closer to the 'ROF strategic employment site Featherstone', which is mentioned in Section 6 - Spatial Option D – which says that a single urban extension would be accommodated in the area to the north of the Black Country conurbation (in the i54/ROF Featherstone corridor) and proposes 13.5% of housing here. This is less than that proposed in Option F to the north of the Black Country conurbation, however the benefits of this employment site are not mentioned when discussing Option F, and it is unclear why this is. There are also railway stations within this area, including Bloxwich, Bloxwich North and Landywood, which would allow accessible, sustainable travel to employment opportunities further afield, including into Birmingham. Therefore, the scoring for SA Objective 12 is not clear and should be better justified or reconsidered. The objectivity and parity of the assessment when assigning scores could be questioned. It is considered that Option F should score more positively for SA Objective 12, in which case Option G and Option F should score the same in the SA assessments, and therefore all site alternatives based on Spatial Strategy Option F should be considered in the 2021 SA. Section 1.9.6 of 2021 Reg 18 (III) SA states that the likely positive impacts of the spatial options in the Spatial Housing Strategy and Infrastructure Delivery SA Report related to the provision of housing in locations where new residents would have good access to education, employment opportunities and sustainable transport options, including rail and bus services. However, Spatial Option G has been identified as the best-performing option, as the proposed development would be likely to result in the greatest positive impacts in terms of sustainability, in particular in regard to access to education and employment. The 2021 Reg 18 (III) SA should explain why these two SA Objectives appear to be prioritised. In addition, as set out above, it is considered that the scoring for SA Objective 12 should be higher for Option F, which suggests that all reasonable alternatives in the proposed urban extension under Spatial Strategy F have been missed off and not properly been considered going forwards.</p>	<p>Not addressed and scoring not reconsidered.</p> <p>With regard to the scores in the Spatial Housing Strategy and Infrastructure Delivery SA report and Option G being identified as the best performing option, it is not explained why education and employment objectives appear to be prioritised. Option F would provide more development closer to the 'ROF strategic employment site Featherstone'. The scoring for SA Objective 12 is not clear and should be reconsidered. This suggests that all reasonable alternatives in the proposed urban extension under Spatial Strategy F have been missed off and not properly been considered going forwards.</p> <p>See detailed comments to Question 8 of the SA compliance review in Appendix 1</p>
<p>Reasonable alternatives – It is also unclear why Option F is given the same negative scoring as Option G for SA Objectives 1 Climate Change Mitigation, 3 Biodiversity and Geodiversity, 4 Landscape and Townscape, 5 Pollution and Waste (Air Quality), 6 Natural Resources (Agricultural Land) and 9 Cultural Heritage, given that Option G directs housing development to more open, greenfield, agricultural land in areas with poor accessibility to sustainable transport options and facilities. For</p>	<p>Not addressed. The thoroughness and justification of scoring is at risk of being questioned.</p>

Areas of the Regulation 18 (III) SA Identified as Requiring Additional Consideration	Incorporation into the 2022 Reg 19 SA
<p>example, in Option G, housing is proposed at Brewood, Perton, Pattingham, Kinver, Swindon and Wheaton Ashwood, primarily all of which are relatively isolated villages surrounded by agricultural land, as opposed to an existing conurbation. Pattingham is approximately 10km from the nearest largest provision of transport and facilities (Wolverhampton). With only small villages in their immediate surrounding area and few facilities nearby, development in this spatial strategy would therefore likely require all new residents to use cars to access these facilities, rather than more sustainable modes of transport such as public transport, walking or cycling, which would worsen impacts on air quality. The villages have limited GP and dentist provision which would have negative implications for social infrastructure and the health and wellbeing of the population. Motte Meadows National Nature Reserve (NNR) lies 850m north west of Wheaton Aston. Given the sensitivity of this site, it is anticipated that negative impacts, for example from recreation pressure, would be likely from development in proximity. Therefore, it is accepted that impacts on the above SA Objectives would be negative for Option G. In contrast, Option F does not propose housing in these locations and instead directs a large percentage of housing to an urban extension surrounded by existing development and urbanised areas, with accessibility to the public transport network and proximity to local facilities and amenities including schools, healthcare, education, leisure and green space. This would encourage more sustainable forms of transport with lesser impacts on air quality, climate change and provide better benefits for the health and wellbeing of the community. It is therefore considered that Option F should score more positively than Option G for the above SA Objectives. Many of the locations listed above are located in a Source Protection Zone (e.g. Perton, Pattingham, Swindon, Kinver) where housing is proposed in Option G and could therefore increase the risk of groundwater contamination. Section 3.16.5 of the Issues and Options SA (Residential spatial distribution: Option B) states that smaller scale development at each of these locations would help to ensure that any contamination events are relatively limited. With more housing in Option G of the Spatial Housing Strategy and Infrastructure Delivery SA Report focused in these locations, then contamination would presumably be more likely. Similarly, surely Option F should score more positively than Option C in the Spatial Housing Strategy and Infrastructure Delivery SA Report (Section 5) in which 100% of development in the plan period would occur in the district's rural villages. However, Option F scores the same as Option C for SA Objectives 1 Climate Change Mitigation, 3 Biodiversity and Geodiversity, 4 Landscape and Townscape and 6 Natural Resources, which raises questions around the thoroughness and justification for scoring.</p>	<p>See detailed comments to Question 8 of the SA compliance review in Appendix 1.</p>
<p>Reasonable alternatives – Option F and Option G are given the same score (minor positive +) for SA Objective 10 Transport and Accessibility. Section 8 of the Spatial Housing Strategy and Infrastructure Delivery SA Report - Option F – stresses the aim of this spatial strategy to allocate sites in locations with the best public transport links and opportunities to expand onto previously developed land. The strategy identifies that sites on the fringes of existing settlements (e.g. the Black</p>	<p>Not addressed.</p> <p>Given the more dispersed pattern of development set out in Option G, compared to</p>

Areas of the Regulation 18 (III) SA Identified as Requiring Additional Consideration	Incorporation into the 2022 Reg 19 SA
<p>Country) offer public transport links in the closest proximity to higher order service centres in these areas. The aim of Spatial Option F is focused on giving first consideration to “land which has been previously-developed and/or is well-served by public transport”. Therefore, it is unclear why Option F scores the same for SA Objective 10 as Option G, rather than better, and raises questions around the robustness of the scoring. Given the reasoning outlined above it is also unclear how this conclusion is considered reasonable, due to the proposed housing in Option F being more sustainably connected. In the Spatial Housing Strategy and Infrastructure Delivery SA Report, Option G is said to “reflect local infrastructure opportunities”, however based on the reasons outlined above, it is argued that Option F’s key focus on the urban extension to the northern edge of the Black Country conurbation in proximity to railway stations and existing facilities makes Option F primarily more aligned with local infrastructure. Option F clearly promotes the use of sustainable infrastructure, whereas Option G includes a proposed urban extension along the A449 corridor, which does not promote the use of sustainable travel opportunities. This is particularly relevant seeing as the 2021 Reg 18 (III) SA explains that a ‘Climate Change Adaptation and Mitigation’ (CCAM) study (AECOM, October 2020) has been undertaken to inform the development of energy and sustainability policies across Staffordshire and the eight constituent Local Authorities. The study found that 53.8% of South Staffordshire’s energy is sourced from petroleum products and indicates that reducing the need to travel and promoting sustainable transport options could make a substantial contribution to reducing greenhouse gas emissions. The 2021 Reg 18 (III) SA states that the spatial strategy aims to locate development primarily where new residents would have better access to existing services and facilities and access to sustainable transport, including railway stations, where possible. Furthermore, the 2021 Reg 18 (III) SA says that this approach has the potential to reduce greenhouse gas emissions in comparison with an approach which requires a more dispersed pattern of development. The reasonable alternatives identified within the SSLPR need to align with the objectives of studies such as the CCAM and should be based on the evidence set out in these reports. Given the more dispersed pattern of development set out in Option G, compared to Option F, it is unclear how the option selection process aligns with this.</p>	<p>Option F, it remains unclear how the option selection process aligns with this.</p>
<p>Reasonable alternatives – Following the appraisal of the potential development site ‘Land at Yieldfields, Bloxwich’ within the 2021 Reg 18 (III) report, it is clear that a) Bloxwich justifiably represents a sustainable location for housing and b) Bloxwich should be included within any proposed site allocations within the SSLPR based on its sustainability credentials. The site Land at Yieldfields, Bloxwich is suitably located in proximity to local facilities, public transport, employment opportunities and green spaces, and will add to the current services available in the area through the provision of approximately 900 homes, a primary school, public open space and recreational opportunities and allotments. The closest bus stops are located 650m from the site, whilst the closest rail station is located 1.8km from the site; both are easily accessible via the local road and pedestrian networks,</p>	<p>Not addressed.</p> <p>The objectivity and parity of the assessment when assigning scores could still be questioned.</p>

Areas of the Regulation 18 (III) SA Identified as Requiring Additional Consideration	Incorporation into the 2022 Reg 19 SA
<p>reducing the reliance on private vehicular access, and resultant emissions. There are also several PRoW in proximity of the site which future development could connect with in order to improve sustainable accessibility and connectivity to the wider area. The site has the potential to retain and enhance elements of the landscape, green infrastructure network and pedestrian and cycling routes in the existing and new community, providing benefits in relation to several objectives, including climate change mitigation and adaptation, biodiversity, health and wellbeing and economy and employment. Enhancement of the green infrastructure network will also provide benefit to the local Green Belt, by further supporting barriers to urban sprawl, and biodiversity features onsite through the provision of enhanced habitat and foraging provision. Further afield, statutory and non-statutory ecological designations outside of the site footprint are not expected to be adversely affected by the future development due to their distance from site, and intervening development. The site presents the opportunity to contribute to green corridors in the area, linking up networks of green spaces, including the canal corridor to the west. The cumulative beneficial impacts of these points altogether should also be assessed. The above is contrasted to those reasonable alternative sites selected in the 2021 Reg 18 (III) SA based on Option G of the Spatial Housing Strategy and Infrastructure Delivery SA Report, including those sites at Pattington, Kinver, and other more rural locations. The site appraisal within the 2021 Reg 18 (III) report demonstrates that Land at Yieldfields, Bloxwich scores considerably better (more positively) than Policy SA3: Strategic development location: Land north of Linthouse Lane (Site 486c of the 2021 Reg 18 (III) SA Appendix B) which has been identified in the 2021 Reg 18 (III) SA for major housing growth, for the reasons outlined above. Land north of Linthouse Lane is awarded just four positive scores against the 12 SA Objectives. Land north of Linthouse Lane does not have the benefit of being within close proximity to a railway station, with the nearest being Bloxwich North, located over 5km to the east. Therefore, new residents would likely rely heavily on private car use for means of transport to access employment and community facilities, increasing emissions and effects on climate change and health. Land north of Linthouse Lane is given a score of uncertain for SA Objective 1 Climate Change Mitigation, however given the above we consider this should be given a negative score due to the lack of sustainable transport options. Land north of Linthouse Lane is relatively isolated in terms of existing green spaces, and it is unclear how any proposed green infrastructure would link with existing networks to create meaningful corridors and connections for the benefit of biodiversity habitats as well as human health and wellbeing. The reasons put forwards for development at Land north of Linthouse Lane include that this location is well connected to the Black Country urban area which means residents will have good access to services and employment opportunities in the adjacent towns and cities. Land at Yieldfields, Bloxwich is closer to the nearest Town Centre (Bloxwich) than Land north of Linthouse Lane is to the nearest large hub (Wolverhampton, approximately 4km southwest of Land north of Linthouse Lane). Given the scoring for Land at Yieldfields, Bloxwich which demonstrates that this site achieves the above</p>	

Areas of the Regulation 18 (III) SA Identified as Requiring Additional Consideration	Incorporation into the 2022 Reg 19 SA
<p>and scores better against the SA Objectives, it is unclear why this site has not been included within the SA as a reasonable alternative for development. Therefore, the objectivity and parity of the assessment when assigning scores could be questioned. It is concluded that there are more suitable sites within the Plan area that have not been adequately considered or included for allocation when it is clear from this review that the SSLPR should prioritise development in such locations.</p>	
<p>Non-Technical Summary - Whilst the SSLPR is at the Regulation 18 iii Consultation stage, it is good practice to have an NTS for each revision of the SA, so that the process and findings are accessible to the general public / non-technical reader at each stage. It is helpful for the NTS to explain what has changed and how the SA has evolved through the iterations. This should be rectified at the Regulation 19 Consultation stage.</p>	<p>Comment addressed. The 2022 Reg 19 SA Report includes a NTS. The NTS is written in a language that is easily understood and summarises all key parts of the process, conclusions and next steps.</p> <p>The NTS could be improved by providing concise reasons as to the selecting the preferred options based on the impacts on the topics in the SA Objectives, rather than pointing the reader to Appendix H of the 2022 Reg 19 SA Report.</p>
<p>Limitations and Assumptions - The 2021 Reg 18 (III) SA sets out the assumptions, uncertainties and limitations of predicting effects including the reliance on expert judgement, the influence of a range of factors such as the design and the success of mitigation measures, ensuring alternatives were appraised consistently and reliance on the best available information, including that provided by the Council and information that is publicly available. Section 3 of the 2021 Reg 18 (III) SA also includes a section describing the assumptions that were made for the specific topics of the SA Objectives Assessments, to ensure that assessments are consistent. The 2021 Reg 18 (III) SA states that up-to-date ecological surveys and/or landscape and visual impact assessments have not been available for all reasonable alternative sites. It should be clarified where these assessments have been available and information incorporated into the appraisals, for transparency.</p>	<p>Not addressed.</p> <p>The 2022 Reg 19 SA states that for the assessment of development proposals, up-to-date ecological surveys and/or landscape and visual impact assessments have not been available. It should be clarified when these will be available and where they can be accessed, for transparency.</p>

Conclusion

- 2.4 This report has reviewed the 2022 Reg 19 SA, prepared by Lepus Consulting Ltd on behalf of SSSDC in October 2022 against the requirements of the SEA regulations and Section 19 of the Planning and Compulsory Purchase Act 2004 (the "Act") which sets out the requirements for SA. This review has sought to focus on the areas that Barton Willmore, now Stantec felt needed more explanation and detail at the Regulation 18 (III) stage and identify whether comments have been addressed in the 2022 Reg 19 SA.
- 2.5 With regard to the areas of the 2021 Reg 18 (III) SA identified as being at greatest risk of challenge, there is some additional consideration required with respect to the Cumulative Effects Chapter of the 2022 Reg 19 SA (see Table 2.1). Comments pertaining to the monitoring of significant effects have been addressed.
- 2.6 It remains true that additional clarification is required for areas relating to: relevant plans and programmes; the existing environment (including HRA); reasonable alternatives; and limitations and assumptions (see Table 2.2). Compared to the 2021 Reg 18 (III) SA, the 2022 Reg 19 SA includes a NTS that is written in a language and easily understand and summarises all key parts of the process, conclusions and next steps.

**APPENDIX 1:
SUSTAINABILITY APPRAISAL COMPLIANCE REVIEW**

TABLE 2.1: SUSTAINABILITY APPRAISAL COMPLIANCE REVIEW

<p><i>This is a compliance review against the requirements of the Regulations. It has not been undertaken by a legal professional. The SA process has been reviewed against the SEA Regulations and requirements of the Planning & Compulsory Purchase Act 2004 on SA. The following reports have been considered:</i></p> <ul style="list-style-type: none"> • SA Scoping Report (November 2017) (herein referred to as the 2017 SA Scoping Report); • Issues and Options SA Report (September 2018); • Spatial Housing Strategy and Infrastructure Delivery SA Report (October 2019); • South Staffordshire Local Plan Review Preferred Options Plan Regulation 18 (III) SA Report (August 2021) (herein referred to as the 2021 Reg 18 (III) SA); and • SA of the South Staffordshire Local Plan: Regulation 19 SA Report (herein referred to as the 2022 Reg 19 SA). 	<p>Compliance Key</p>	<p>Notes</p>
	<p style="background-color: #00b050; color: white; text-align: center;">Meets requirements</p>	<p>Meets requirements</p>
	<p style="background-color: #ffc107; color: white; text-align: center;">Improvements suggested</p>	<p>Improvements suggested</p>
	<p style="background-color: #dc3545; color: white; text-align: center;">Risk of challenge. Does not meet requirements</p>	<p>Risk of challenge. Does not meet requirements</p>
<p>SEA Regulations, Regulation 12 and Schedule 2 - Contents of Environmental Report</p>		
<p>1. An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.</p>	<p style="background-color: #ffc107;"></p>	<p>Covered in Sections 1, 2, 3-14 and Appendix B of the 2017 SA Scoping Report, Section 1 of the Issues and Options SA Report, Section 1 of the 2021 Reg 18 (III) SA and Section 1 of the 2022 Reg 19 SA</p> <p>Section 1 of the 2021 Reg 18 (III) SA sets out the context, purpose and objectives of the SSLPR. Figure 1.2 sets out the SA and Local Plan process and Table 1.1 sets out the timeline of stages of the SSLPR and SA process undertaken to date, which is helpful. Section 1.3.3 of the 2021 Reg 18 (III) SA should note that the SEA Directive were transposed in the UK by the SEA Regulations and also amended by the Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI 2018/1232).</p> <p>Sections 3-14 of the 2017 SA Scoping Report summarises the findings of an initial policy, plan and programme review for each sustainability topic area. More detailed information is included in Appendix B which lists the policy, plans and programmes that are relevant to the preparation of the SSLPR and to the SA and notes the implications of each for the SSLPR and the 2021 Reg 18 (III) SA. Section 15.2.2 of the 2017 SA Scoping Report explains that the SA objectives have been selected in light of the review of relevant plans, policies and programmes to develop the SA Framework.</p> <p>The subsequent SAs prepared since the 2017 SA Scoping Report did not include an updated review of the relevant international and national plans, policies and programmes. Appendix A: Plan, Policy and Programme Review of the 2022 Reg 19 SA includes an updated review of international plans, policies and programmes, addressing the topics appraised in the 2022 Reg 19 SA:</p> <ul style="list-style-type: none"> • Air; • Biodiversity, flora, and fauna; • Climatic factors; • Cultural heritage; • Human health; • Landscape; • Population and material assets; • Soil; and • Water; <p>Compared to the previous iteration, the information within the 2022 Reg 19 SA is up-to-date and highlights the relevant policy and legislation changes since 2017. However, the updated review does not discuss those EU directives which have been transposed into UK law, where their objectives are still specific to the EU as a whole, and does not specify the UK. Policies pertaining to the NPPF have been updated to the latest July 2021 versions, with the exception of the NPPF (2012) policy relating to the presumption of sustainable development within the climatic factors policy review. In terms of legislation, the 2021 Reg 18 (III) SA did not refer to the 2019 amendment to the Climate Change Act, nor does the 2022 Reg 19 SA. The Climate Change Act 2008 committed the UK to an 80% reduction in carbon emissions relative to the levels in 1990, to be achieved by 2050. In June 2019, secondary legislation was passed that extended that target to 'at least 100%' (i.e., net zero). The 2021 Reg 18 (III) SA did not acknowledge the publication of the 25-year Environment Plan or the Environment Bill (which has now become the Environment Act after the House of Lords gave Royal Assent to the legislation on 9th November 2021). The 2022 Reg 19 SA does acknowledge the Environment Act, but does not specify that it mandates biodiversity net gain. This should be rectified given that the targets of the Environment Act are</p>

TABLE 2.1: SUSTAINABILITY APPRAISAL COMPLIANCE REVIEW

		<p>required to be embedded through Government policy in areas such as plan making. The Department for Environment, Food and Rural Affairs (DEFRA) has recently released Biodiversity metric 3.0 for calculations.</p> <p>The 2022 Reg 19 SA refers to current trends (for example in terms of renewable energy), but could better refer to likely future trends, such as the use of electric vehicles and smart technology, all of which are being implemented by developments at a fast pace, owing to the legislation above.</p> <p>Compared to the previous iterations, the 2022 Reg 19 SA does summarise the significant policy changes that have taken place since the 2017 SA Scoping Report was published. However, it still remains unclear if aspects of the SA Framework have been updated, or if any such updates are in response to consultation with statutory consultees (updates to SA Framework criteria and indicators). This clarification is important considering that the South Staffordshire LPR and the SA should not be prepared in isolation and will be influenced by other plans, policies and programmes. It remains the case that the adopted plan should be in line with broader sustainability objectives established at international and national levels and relevant environmental protection legislation. As a result, The 2022 Reg 19 SA does not outline how these plans would work holistically to achieve sustainable growth, how they may relate and interact and how their combined effects have been identified and assessed through the SA process to achieve the best outcome and to guide development with South Staffordshire.</p> <p>Section 2.3.3 of the 2022 Reg 19 SA explains that statutory consultees including Historic England, Natural England and the Environment Agency and other relevant bodies were consulted with on the content of the 2017 SA Scoping Report and that the comments received were taken into consideration and the 2017 SA Scoping Report amended where appropriate. The comments from statutory consultees are available to the reader in Appendix C of the 2022 Reg 19 SA. There were also subsequent comments made on the Issues and Options SA Report and the Spatial Housing Strategy and Infrastructure Delivery SA Report. Table 1.2 of the Spatial Housing Strategy and Infrastructure Delivery SA Report notes the comments provided by the Environment Agency, Natural England and Historic England in response to the Issues and Options SA Report and how these have been incorporated into the Spatial Housing Strategy and Infrastructure Delivery SA Report, which is helpful. It still remains unclear if these were the only interested parties to comment, however, aspects of this reporting appear to have been carried over into the 2022 Reg 19 SA. Section 2.2.5 of the 2022 Reg 19 SA states that the consultation of the Spatial Housing Strategy and Infrastructure Delivery SA report enabled interested persons to comment on the SA of the options for the spatial strategy, which was followed by the Preferred Options Consultation (2021) which set out proposed sites for housing, employment and the Gypsy and Traveller community. It remains unclear how many comments were received and what these comments related to.</p> <p>Appendix C of the 2022 Reg 19 SA does outline the comments received by statutory consultees on the 2017 SA Scoping Report and subsequent SA reports and explains concerns raised and the responses / actions taken to address these consultation comments. Compared to the previous iteration, this makes the process more consistent, transparent and robust, however, as mentioned above, it is still unclear if these were the only interested parties to comment.</p>
<p>2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.</p>		<p>Covered in Sections 2-14 of the 2017 SA Scoping Report, Sections 1 and 3 of the 2021 Reg 18 (III) SA, Section 3 and 7-15 of the 2022 Reg 19 SA.</p> <p>Sections 3-14 of the 2017 SA Scoping Report set out the key sustainability issues relevant to the SSLPR and SA following an analysis of the current baseline situation for the Plan area. Sections 3-14 include helpful visual maps outlining key baseline data for each environmental topic. Boxes 3.2-14.2 of the 2017 SA Scoping Report outline the future evolution of the baseline without the implementation of the SSLPR, for each sustainability topic.</p> <p>Section 1 of the 2021 Reg 18 (III) SA refers the reader to the baseline review in the 2017 SA Scoping Report and Section 3 includes limited baseline context and mapping (some of which date to 2019 e.g., Figure 3.1 Flood Zones, Figure 3.9 Primary Schools) for each SA Objective.</p> <p>Information on the current state of the environment is presented within the 2022 Reg 19 SA; the report first points the reader to the 2017 SA Scoping Report. However, an up-to-date topic-specific baseline context is presented within Sections 7-15 and highlights key issues per topic. The Report does not discuss whether there were any changes in the overall trends identified previously and whether the SA Objectives were affected by this. The 2022 Reg 19 SA does not identify the trends and indicators that would be used over time (this should form an Appendix). These should include the COVID-19 pandemic and resulting recession and lifestyle changes including a rise in unemployment, changes in consumer behaviour and spending patterns. However, the trend of working from home and resultant reduction in work-related travel and subsequent emissions to air has been identified as a result of the COVID-19 pandemic. The Government has published a 10-point plan for a Green Recovery, which should be considered in the 2022</p>

TABLE 2.1: SUSTAINABILITY APPRAISAL COMPLIANCE REVIEW

		<p>Reg 19 SA. The urgency of the climate and biodiversity emergencies should be acknowledged given recent policy, legislation and progress reports (such as the recent Sixth Assessment Report published by the International Panel on Climate Change (IPCC)).</p> <p>The 2022 Reg 19 SA does not make clear a summary of key sustainability issues for South Staffordshire. A detailed policy context per topic is set out per SA Objective as an Appendix, and some sustainability impacts have been assessed within an Appendix for some SA Objectives. The 2022 Reg 19 SA should state that the sustainability objectives and supporting appraisal questions were defined by reference to the key sustainability issues facing South Staffordshire.</p> <p>Compared to the 2021 SA, it is useful that Table 3.1 in the 2022 Reg 19 SA defines the likely evolution of the Plan area without implementation of the Plan as an option to discuss any changes in the absence of the new Plan. It takes into account information gathered at the scoping stage and more up-to-date statistics. An alternative policy option of not implementing the plan, representing a 'no development' option is not assessed in the 2022 Reg 19 SA.</p>
<p>3. The environmental characteristics of areas likely to be significantly affected.</p>		<p>Covered in Sections 3-14 of the 2017 SA Scoping Report, Section 3 of the 2021 Reg 18 (III) SA and Sections 7-15 of the 2022 Reg 19 SA.</p> <p>Sections 3-14 of the 2017 SA Scoping Report set out the key sustainability issues.</p> <p>The 2022 Reg 19 SA reflects an up-to-date evidence base (including up-to-date GIS mapping) upon which effects have been identified. Although, the Report does not explicitly state that efforts have been made to ensure that the SA reflects the latest evidence base. It would be helpful if the SA outlined the aspects of the assessment process which might benefit from additional research or evidence that currently limits the ability of the SA process to provide further detail that that supplied in this report. For example, the inclusion of an indicative list of updated evidence that would be expected to improve the SA assessments, including: School capacity; GP surgery capacity; Carbon footprint; Green Infrastructure and ecological network mapping; and Ecosystem services. Section 8.4.1 of the 2022 Reg 19 SA states that there is some uncertainty regarding Air Quality impacts on Habitats sites. However, there is reference to an emerging HRA (including Appropriate Assessment) in the 2022 Reg 19 SA, which was published 2 months after the Report and states likely significant effects on several SACs and Ramsar sites. Uncertainty is highlighted for impacts on underground archaeology, as significance of such features may not be known at this time (which is expected for below-ground heritage assets).</p>
<p>4. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Council Directive 79/409/EEC on the conservation of wild birds(a) and the Habitats Directive.</p>		<p>Covered in Section 5 of the 2017 SA Scoping Report, Section 3 of the 2021 Reg 18 (III) SA and Section 8 of the 2022 Reg 19 SA.</p> <p>Section 5 of the 2017 SA Scoping Report highlights the ecology baseline including the SACs in the area and Appendix B states that the SSLPR and SA will need to have due regard to these. Box 5.1 of the 2017 SA Scoping Report, which summarises the key biodiversity issues for South Staffordshire, explains that a HRA will be required to ensure that there will be no likely significant effects of the SSLPR on the Motte Meadows SAC or Cannock Chase SAC. The Issues and Options SA does not include any reference to HRA. The Spatial Housing Strategy and Infrastructure Delivery SA makes only limited reference to HRA, which states that adverse impacts on European designated sites from development will be considered in a HRA which will inform the SSLPR. It is therefore assumed that in the SA stages prior to the 2021 Reg 18 (III) SA, the assessment of effects on biodiversity was undertaken prior to knowing the conclusions of the HRA exercise and therefore, the effects identified in the 2021 SA are based on baseline data available and reasonable assumptions.</p> <p>The 2021 Reg 18 (III) SA states that a HRA will be completed alongside the draft SSLPR and that the findings of the HRA will inform the SA, however there is little mention of it. Section 3.3 of the 2021 Reg 18 (III) SA outlines the methodology used for assessing effects on biodiversity and explains that a HRA will be prepared to inform the Zones of Influence within which impacts at European sites will be considered and therefore will provide an in-depth assessment of the potential for likely significant adverse effects on European sites within and surrounding the Plan area, to inform the SA. The 2021 Reg 18 (III) SA explains that any proposed site which lies within the 15km Zone of Influence for Cannock Chase SAC has the potential to have negative effects in terms of increasing the human population, tourism or visitor use at the SAC and the assessments have therefore been undertaken with this in mind. Box 3.3 should include the assumptions used in the absence of HRA conclusions, for example that the effect of development is uncertain. SA Objective 5 Pollution and Waste which includes impacts on Air Quality should make reference to any known nitrogen deposition / dust issues in relation to European sites of importance including Cannock Chase SAC and cross reference the need for HRA to determine impacts and mitigation in more detail. The effects of the potential sites on other SACs in, or in proximity to, South Staffordshire are deemed to be uncertain at this stage of this assessment. It is apparent that the HRA had not been completed at the time of preparing the 2021 Reg 18 (III) SA. The 2021 Reg 18 (III) SA concludes that at this stage, the potential effects of the development of the reasonable alternative sites on SACs are uncertain but that the findings of the HRA will be fully integrated into the SA process once this report becomes available.</p>

TABLE 2.1: SUSTAINABILITY APPRAISAL COMPLIANCE REVIEW

		<p>In section 8.1.7 of the 2022 Reg 19 SA, reference is made to a HRA that was completed in October 2021, 2 months after the publication of the 2021 Reg 18 (III) SA. The HRA has been undertaken alongside the preparation of the Local Plan to provide an assessment of the potential threats and pressures to Habitats sites and analysis of potential impact pathways. The evolving outputs of the HRA have informed the 2022 Reg 19 SA. Although section 8.1.8 of the 2022 Reg 19 SA states that there is an emerging HRA to support the Publication Version of the LPR, the now complete HRA is in fact available on the SSLPR Evidence Base. Therefore, the findings of the HRA and Appropriate Assessment exploring the likely significant effects and required mitigation measures are fully reflected and are available to support the Regulation 19 consultation, although not explicitly detailed in the 2022 Reg 19 SA; the HRA has clearly been undertaken but is not well incorporated into the 2022 Reg 19 SA. Appendix 2 of the HRA does identify nitrogen deposition issues in relation to sites of European sites of importance, including Cannock Chase SAC. There is evidence that cumulative effects have been assessed in relation to the European sites in the HRA, which is also the case for in-combination effects, for legal compliance. It is unclear how the HRA has influenced the SA assessments.</p> <p>Given the need for assessments to be coordinated, it would be helpful to have more information within the 2022 Reg 19 SA from the HRA and Appropriate Assessment undertaken for the Local Plan.</p>
<p>5. The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.</p>		<p>Covered in Sections 3-14 and Appendix B of the 2017 SA Scoping Report and Section 3 of the 2021 Reg 18 (III) SA.</p> <p>Appendix B of the 2017 SA Scoping Report details the international, national, regional and local Environmental protection objectives and the implications for the SSLPR and SA. Section 3 and Boxes 3.1 to 3.12 of the 2021 Reg 18 (III) SA includes the methodology and assumptions that have been used for the SA assessments for each environmental topic and relates local data, policies, protection objectives and designations, limits or standards into the SA Objectives which helps to align the SA framework with relevant local issues and shows how they have been considered. The 2022 Reg 19 SA expands on this section in limited detail, by referencing a list of limits or standards for certain topics, such as including a reference to National Air Quality Objectives in Section 7 and a list of objectives of the Water Framework Directive in Section 8 that pertain to River Basin Management Plans. The 2022 Reg 19 SA could be improved by covering a more exhaustive list of limits or standards for each topic (e.g., condition of Site of Special Scientific Interest (SSSI) and incorporating these into the SA Objectives to thoroughly explain the way in which these local environmental considerations have been taken into account.</p>
<p>6. The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues such as—</p> <ul style="list-style-type: none"> (a) biodiversity; (b) population; (c) human health; (d) fauna; (e) flora; (f) soil; (g) water; (h) air; (i) climatic factors; (j) material assets; (k) cultural heritage, including architectural and archaeological heritage; (l) landscape; and (m) the inter-relationship between the issues referred to in sub-paragraphs (a) to (l). 		<p>Covered in Section 16 of the 2017 SA Scoping Report and Sections 2, 4 and 5, Appendices A, B, C and D of the 2021 Reg 18 (III) SA and Chapters 7-15 of the 2022 Reg 19 SA.</p> <p>Appendix B of the 2022 Reg 19 SA presents the SA Framework, including the SA Objectives, decision making criteria and indicators. The SA framework (comprising the Sustainability Objectives agreed during Scoping) has been used to assess the SSLPR's reasonable alternative sites including housing, employment and Gypsy and Traveller sites. Appendix G includes impact matrices of all reasonable alternative sites (pre-mitigation and post-mitigation). Appendix I includes matrices showing an assessment of Strategic Policies and Development Management Policies (pre-mitigation and post-mitigation), with detailed commentary.</p> <p>Section 4.7.2 of the 2022 Reg 19 SA acknowledges that, in accordance with the SEA Regulations, the assessment of effects should include secondary, cumulative, synergistic, short, medium and long-term, permanent and temporary, positive and negative effects. Major Negative effects through to Major Positive effects are defined in Table 4.4. Secondary, cumulative and synergistic effects are identified in the Glossary of the SA. Short, medium and long-term effects are not defined. Section 16.3.3 of the 2017 SA Scoping report also includes a limited description of cumulative, indirect and synergistic effects and states that these effects will be identified and evaluated during the assessment and that this will be presented in tabular format and show where the different effects arise when two or more draft policies operate together. This has not been completed in future iterations of the SA.</p> <p>Section 6.6.2 states that each of the topics have been appraised in terms of plan-wide impacts and raw on all aspects of the SA process, including the findings presented for the assessment of policies and site allocations, pointing the reader to the Appendices for full assessments. Section 6.6.2 also states that the assessments include consideration of the impacts arising between the different topics and identify, secondary, cumulative and synergistic effects where they arise. Cumulative effects are summarised in Chapter 16 of the 2022 Reg 19 SA. Within the main body of the 2022 Reg 19 SA report, there is scant mention of synergistic, cumulative and in combination effects per topic.</p> <p>The 2022 Reg 19 SA should define short, medium, and long-term effects. In addition, the Report should explain how the SA has considered these effects of the site alternatives and policies set out in the SSLPR. The 2022 Reg 19 SA should include a separate section setting out the methodology used to determine cumulative effects, which would create a more robust and transparent</p>

TABLE 2.1: SUSTAINABILITY APPRAISAL COMPLIANCE REVIEW

		<p>assessment. For example, Table 4.4 Guide to scoring significant of the 2022 Reg 19 SA shows that a site that contributes to a cumulative significant effect, amongst other factors, is likely to be awarded a score of major negative. Cumulative effects are not mentioned in relation to major positive scores and there is no explanation of how these are considered within each topic. In the assessments it is unclear as to which options/topics were scored major negative due to cumulative effects and whether the rest were negligible/had no cumulative impacts. It is not clear whether a major positive score would contribute to a cumulative significant effect (in a positive way). The SA Objectives methodologies are presented in Appendix D of the 2022 Reg 19 SA should outline how cumulative effects might contribute to determining the category (e.g., minor/significant positive/negative, etc.) given in the SA assessment matrices. The potential cumulative effects of the Plan, including the site alternatives, should be considered prior to the Regulation 19 Stage. The 2022 Reg 19 SA does also not refer to cross border effects, for example in relation to housing provision or downstream flooding which can occur where a plan will have effects outside of the plan area and should be documented in the 2022 Reg 19 SA. As mentioned above, the cumulative effects are summarised in Chapter 16, which identify and evaluate the effects that arise when the total significant effects of the LPR and assessed alongside known existing underlying trends and other plan and programmes. However, Chapter 16 does not include any mitigation measures included within the Local Plan to reduce these effects.</p> <p>The approach to the assessment of cumulative effects should be well outlined in the methodology section and should be consistent between the different environmental topics.</p>
<p>7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.</p>		<p>Covered in 2017 SA Scoping Report, Section 6 and Appendix E of the 2021 Reg 18 (III) SA, Section 6 and Appendix G of the 2022 Reg 19 SA.</p> <p>The 2017 SA Scoping Report begins to highlight some potential mitigation measures that may be incorporated into future development, for example, Section 5.2.3 states that mitigation measures have been agreed to seek to address potential increases in visitor use on the Cannock Chase SAC resulting from additional housing allocations. As does the Issues and Options SA Report, which refers to the use of measures such as native screening vegetation to mitigate views from Cannock Chase AONB.</p> <p>Section 6.4.1 of the 2022 Reg 19 SA explains that the policies in the SSLPR set out a suite of requirements which would be likely to help ensure that impacts on sustainability identified as a result of the development proposed in the plan are avoided. The post-mitigation SA findings for all reasonable alternative sites, including the sites that have been selected are set out in Appendix G, and summarised in Section 6. The effects in Table 6.5 have been identified following the consideration of the likely mitigating influence of the draft Strategic Policies and Development Management Policies in the SSLPR.</p> <p>Table G.4.1 (impact matrix of all reasonable alternative selection site assessments post-mitigation) sets out the potential adverse impacts that have been identified through the sustainability assessments of the alternative sites in Appendix I, and which, if any of the draft policies would be likely to mitigate these effects. Mitigation and enhancement measures are clearly set out within the policies of the Plan are clearly identified in Appendix G for SA Objective Topic and the effect of these on the likely significant effects of the sites identified within the post-mitigation site assessments. The link between the mitigation measures that have been built into policies designed to mitigate the adverse effects of the Plan and the overarching legislative mechanisms driving these that will also provide mitigation could be better explained. In determining the significance of the effects of the options for potential inclusion in the Plan, other planning documents such as the NPPF and the relationship between these must be considered, as these may provide additional safeguards or mitigation of potentially significant adverse effects. It is not clear how this has been done within the 2022 Reg 19 SA.</p> <p>It still stands that more detailed environmental assessment work should be undertaken on each of the proposed options, including reasonable alternatives sites to identify specific mitigation and enhancement measures. Upon undertaking assessments of sites, this should also consider design measures such as the creation of pedestrian and cycling infrastructure, green space, future proofing to increase mitigation of and adaptation to climate change (for example the incorporation of SuDS and the Future Homes Standard). In addition, the standard mitigation measures such as the implementation of a CEMP, in accordance with appropriate legislation and best practice for development sites, which would mitigate construction effects from noise, air quality and traffic and minimise the likelihood of significant effects arising.</p> <p>It would be helpful if there was a section outlining the changes to the Plan which have occurred because of suggestions raised during the appraisal process for reducing the negative impacts of the Plan and enhancing its benefits.</p>
<p>8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.</p>		<p>Covered in 2017 SA Scoping Report, Issues and Options SA Report, Spatial Housing Strategy and Infrastructure Delivery SA Report, Sections 2, 4, 5, 6 and Appendices B, C, D and F of the 2021 Reg 18 (III) SA, and Sections 5, 6 and Appendix H of the 2022 Reg 19 SA.</p>

TABLE 2.1: SUSTAINABILITY APPRAISAL COMPLIANCE REVIEW

	<p>Appendix B of the 2022 Reg 19 SA outlines the SA Framework, including the SA Objectives, decision making criteria and indicators. The SA Framework (comprising the Sustainability Objectives agreed during scoping) has been used to assess the SSLPR's reasonable alternative sites including housing, employment and Gypsy and Traveller sites (Chapter 5 of the 2022 Reg 19 SA summarises the findings, with full assessment and detailed commentary per SA objective shown in Appendix F: New and Amended RA Site Assessments) and the Strategic Policies and Development Plan Policies (summarised in Chapter 6, and Appendix I: Policy Assessments that provides detailed assessment and commentary) for likely significant effects on the environment.</p> <p>The SA process has appraised each of the options against the twelve Sustainability Objectives using a matrix with a colour coded key, a method often used for the assessment of site options in SEAs, to make the comparison of the positive and negative sustainability aspects of a site clear and consistent. A set of appraisal questions are used for each objective which ensures the SA considers each effect within clear parameters.</p> <p>The number of iterations of the SA to date and those planned shows that the process is iterative and that there has not been a foregone conclusion throughout. For the most part, the discussion around alternative policies is clear and provides helpful clarity on how the Plan will form a reasonable strategy in terms of environmental impact and steering growth towards sustainable development. Figure 2.2 of 2022 Reg 19 SA sets out the Local Plan process and Section 2.3 sets out a timeline of the stages of the SSLPR and SA process undertaken to date and Section 5 summarises the types of alternatives considered in the SA, which includes a full range of options.</p> <p>The Issues and Options SA Report assessed five options for levels of residential growth, two options for Gypsy and Traveller growth, three options for employment growth, six options for residential distribution, four options for employment distribution and 34 options for policies to be included in the SSLPR. The Spatial Housing Strategy and Infrastructure Delivery SA Report then assessed the seven reasonable alternative spatial options considered for the broad distribution of new housing growth in the Plan area. The Issues and Options SA Report, at that stage, concluded that Spatial Options A (Maximise Open Countryside release), B (Prioritise Green Belt land release in areas of lesser Green Belt harm) and C (Carry forward existing Core Strategy strategic approach to distribution) would be expected to be the worst-performing options, as the proposed development under these three options could have potentially resulted in more likely adverse impacts and less positive impacts than the other options. The negative impacts resulting from these options were identified as relating to directing a higher proportion of housing to more rural locations in South Staffordshire with limited access to essential services, such as education, employment and health centres. The 2021 Reg 18 (III) SA acknowledges that it was difficult to differentiate between the sustainability performance of Spatial Options D (Maximise sites in areas identified in the Greater Birmingham Housing Market Area (GBHMA) Strategic Growth Study), E (Address local affordability issues and settlements with the greatest needs), F (Give first consideration to Green Belt land which is previously developed or well-served by public transport) and G (Infrastructure-led development with a garden village area of search beyond the plan period), as the proposed development under all of these options would be likely to result in the same or similar sustainability impacts. The identified likely positive impacts of these spatial options were due to the provision of housing need in locations where the majority of new residents would have good access to education, employment opportunities and sustainable transport options, including rail and bus services. Spatial Option G was selected as the best-performing option, with the SA concluding that the proposed development under this option would be likely to result in the greatest positive sustainability impacts, in particular in regard to access to education and employment. Based on Option G of the Spatial Options, the 2021 Reg 18 (III) SA assesses the reasonable alternatives considered by the Council in the Preferred Options process. In total, 317 sites (preferred allocations are identified for housing, employment and Gypsy, Traveller and Travelling Showpersons sites) and 51 policies (eleven Strategic Policies and 40 direction of travel Development Management policies) have been assessed against the SA Framework. The 2022 Reg 19 SA includes an assessment of 58 additional reasonable alternative sites, identified by the Council since the previous Regulation 18 (III) SA. Of these 58 sites:</p> <ul style="list-style-type: none">• 39 are new sites that have been identified since the preferred options stage and have been considered in addition to the 317 sites assessed within the Regulation 18 (III) SA; and• 19 are amended version of sites previously assessed in the Regulation 18 (III) SA Report. The amendments relate primarily to boundary alterations whereby landowners or site promoters have re-submitted their sites. <p>Section 4 of the 2022 Reg 19 SA sets out the methodology for determining the significance of reasonable alternatives (a combination of the sensitivity of a receptor and magnitude of change) and Appendix D of the 2022 Reg 19 SA provides additional context to Chapter 4 of the main Regulation 19 SA Report regarding the topic specific methodologies and assumptions used to assess policies, proposals and reasonable alternatives. As per the previous SA, this section could be better at linking effect significance to the need for subsequent mitigation. It would also be useful to understand what this would subsequently mean for policies. The Issues and Options SA Report refers to options for large locations which have been promoted through the Call for Sites and the GBHMA Strategic Growth Study and states that the Council has had numerous smaller sites suggested through the Call for Sites exercise, which reflect the Council's SHELAA. The 2022 Reg 19 SA could better outline the process behind which the seven spatial options in the Spatial</p>
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TABLE 2.1: SUSTAINABILITY APPRAISAL COMPLIANCE REVIEW

	<p>Housing Strategy and Infrastructure Delivery SA were developed from the growth/distribution options presented in the Issues and Options SA Report, given that the process should be iterative. The 2022 Reg 19 SA does not explain the process of the selection of the reasonable alternatives in terms of giving references to the sources that the 317(+58) sites selected for assessment were derived from, which could include consultation with statutory consultees, stakeholders and the general public in response to consultation events as well as through Call for Sites / SHELAA or on an ad-hoc basis. The SA should detail the reasons that sites were filtered out at the initial first stage assessment and references should be given to the evidence base supporting alternatives (e.g., Call for Sites).</p> <p>Appendix H of the 2022 Reg 19 SA sets out the outline reasons for selection and rejection of all reasonable alternative sites considered throughout the SA process, provided by SSDC. The 2022 Reg 19 SA should detail the source of these sites, for transparency, as above. There are no equivalent tables for the selection/rejection of policy alternatives. The 2022 Reg 19 SA should provide justification for the selection of the preferred policies in light of the reasonable alternatives identified and appraised, which could be related to overarching local and national objectives, baseline conditions and predicted pressures, and should also note where no reasonable alternatives were identified. It would be helpful to outline whether any options submitted to the Council in the assessment of initial options identified during the early phases of the development of the SSLPR, such as through spatial / growth assessments, were excluded and not considered to be reasonable alternatives at this stage in the Plan-making process and not taken forward and the reasoning behind this, particularly if this was due to sustainability reasons or not. The 2022 Reg 19 SA should explain the selection of the reasonable site and policy options from those initially considered and appraised and provide the Council's justification for the exclusion of previous options and the decisions made. It would be helpful if the SA outlined whether the SA team were involved in this process early on, perhaps via workshops, reviews of the alternatives, and input into giving reasons for why other options were considered to be not reasonable. The 2022 Reg 19 SA should include any collaboration that the SA team had with the SSLPR team and the degree to which they inputted to refining options to be included in the next SSLPR consultation and to be tested through SA. The 2022 Reg 19 SA should outline any initial high-level appraisal that may have been undertaken of the sites, for example at the initial first stage assessment, based on designations and/or subjective assessment and explain whether the considered list of alternatives was initially reviewed by the SA team to ensure that the relevant high level, key factors from the SA were being considered and refine the alternatives prior to an SA being carried out of the initial alternatives. If any site visits and desk-based research were undertaken using existing information this should also be outlined.</p> <p>As above, Spatial Strategy Option G is the option selected and bought forwards from the Spatial Housing Strategy and Infrastructure Delivery SA Report to the 2022 Reg 19 SA of preferred options. Under Option G, just 13.5% of housing is directed as an urban extension to the northern edge of the Black Country conurbation, with development primarily focused in greenbelt areas to the west. Under Option F, 27% of housing is focused as an urban extension to the northern edge of the Black Country conurbation, with less proposed new development in the greenbelt and rural areas than Option G. The SA assessments results for Option F and Option G are very similar, with the only difference being that Option F is given a minor positive (+) score for SA Objective 12 Economy and Employment and Option G is given a major positive (++) score for SA Objective 12.</p> <p>It is unclear why the scores vary for SA Objective 12, given that Option F has a greater focus on providing housing in proximity to existing development and employment opportunities. For example, at Bloxwich, Landywood, Shortheath, Ashmore, Wednesfield (and the University of Wolverhampton), the Hilton Main Industrial Estate to the south of Featherstone and the M54, as well as providing high connectivity (including via public transport) from these to Willenhall, Walsall and Wednesbury further to the south, all which enable access to a wide range of jobs and large commercial and industrial sites, more so than the more rural areas proposed for development in Option G. Option F would provide more development closer to the 'ROF strategic employment site Featherstone', which is mentioned in Section 5 - Spatial Option D – which says that a single urban extension would be accommodated in the area to the north of the Black Country conurbation (in the i54/ROF Featherstone corridor) and proposes 13.5% of housing here. This is less than that proposed in Option F to the north of the Black Country conurbation, however the benefits of this employment site are not mentioned when discussing Option F, and it is unclear why this is. There are also railway stations within this area, including Bloxwich, Bloxwich North and Landywood, which would allow accessible, sustainable travel to employment opportunities further afield, including into Birmingham. Therefore, the scoring for SA Objective 12 is not clear and should be better justified or reconsidered. The objectivity and parity of the assessment when assigning scores could be questioned. It is considered that Option F should score more positively for SA Objective 12, in which case Option G and Option F should score the same in the SA assessments, and therefore all site alternatives based on Spatial Strategy Option F should be considered in the 2022 Reg 19 SA. Section 5.4.17 of the 2022 Reg 19 SA states that the likely positive impacts of these spatial options in the spatial housing options in the Spatial Housing Strategy and Infrastructure Delivery SA Report related to the provision of housing 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. However, Spatial Option G was identified as the best performing option, as the proposed development would be likely to result in the greatest positive impacts in terms of sustainability, in particular regard to access to education and employment. The 2022 Reg 19 SA should explain why these two SA objectives appear to be prioritised. In addition, as set out above, it is considered that the</p>
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TABLE 2.1: SUSTAINABILITY APPRAISAL COMPLIANCE REVIEW

		<p>scoring for SA Objective 12 should be higher for Option F, which suggests that all reasonable alternatives in the proposed urban extension under Spatial Strategy F have been missed off and not properly been considered going forwards.</p> <p>It is also unclear why Option F is given the same negative scoring as Option G for SA Objectives 1 Climate Change Mitigation, 3 Biodiversity and Geodiversity, 4 Landscape and Townscape, 5 Pollution and Waste (Air Quality), 6 Natural Resources (Agricultural Land) and 9 Cultural Heritage, given that Option G directs housing development to more open, greenfield, agricultural land in areas with poor accessibility to sustainable transport options and facilities. For example, in Option G, housing is proposed at Brewood, Perton, Pattingham, Kinver, Swindon and Wheaton Ashwood, primarily all of which are relatively isolated villages surrounded by agricultural land, as opposed to an existing conurbation. Pattingham is approximately 10km from the nearest largest provision of transport and facilities (Wolverhampton). With only small villages in their immediate surrounding area and few facilities nearby, development in this spatial strategy would therefore likely require all new residents to use cars to access these facilities, rather than more sustainable modes of transport such as public transport, walking or cycling, which would worsen impacts on air quality. The villages have limited GP and dentist provision which would have negative implications for social infrastructure and the health and wellbeing of the population. Motte Meadows NNR lies 850m north west of Wheaton Aston. Given the sensitivity of this site, it is anticipated that negative impacts, for example from recreation pressure, would be likely from development in proximity. Therefore, it is accepted that impacts on the above SA Objectives would be negative for Option G. In contrast, Option F does not propose housing in these locations and instead directs a large percentage of housing to an urban extension surrounded by existing development and urbanised areas, with accessibility to the public transport network and proximity to local facilities and amenities including schools, healthcare, education, leisure and green space. This would encourage more sustainable forms of transport with lesser impacts on air quality, climate change and provide better benefits for the health and wellbeing of the community. It is therefore considered that Option F should score more positively than Option G for the above SA Objectives. Many of the locations listed above are located in a Source Protection Zone (e.g. Perton, Pattingham, Swindon, Kinver) where housing is proposed in Option G and could therefore increase the risk of groundwater contamination. Section 3.16.5 of the Issues and Options SA (Residential spatial distribution: Option B) states that smaller scale development at each of these locations would help to ensure that any contamination events are relatively limited. With more housing in Option G of the Spatial Housing Strategy and Infrastructure Delivery SA Report focused in these locations, then contamination would presumably be more likely. Similarly, surely Option F should score more positively than Option C in the Spatial Housing Strategy and Infrastructure Delivery SA Report (Section 5) in which 100% of development in the plan period would occur in the district's rural villages. However, Option F scores the same as Option C for SA Objectives 1 Climate Change Mitigation, 3 Biodiversity and Geodiversity, 4 Landscape and Townscape and 6 Natural Resources, which raises questions around the thoroughness and justification for scoring.</p> <p>Option F and Option G are given the same score (minor positive +) for SA Objective 10 Transport and Accessibility. Section 8 of the Spatial Housing Strategy and Infrastructure Delivery SA Report - Option F – stresses the aim of this spatial strategy to allocate sites in locations with the best public transport links and opportunities to expand onto previously developed land. The strategy identifies that sites on the fringes of existing settlements (e.g. the Black Country) offer public transport links in the closest proximity to higher order service centres in these areas. The aim of Spatial Option F is focused on giving first consideration to <i>“land which has been previously-developed and/or is well-served by public transport”</i>. Therefore, it remains unclear why Option F scores the same for SA Objective 10 as Option G, rather than better, and raises questions around the robustness of the scoring. Given the reasoning outlined above it is also unclear how this conclusion is considered reasonable, due to the proposed housing in Option F being more sustainably connected. In the Spatial Housing Strategy and Infrastructure Delivery SA Report, Option G is said to <i>“reflect local infrastructure opportunities”</i>, however based on the reasons outlined above, it is argued that Option F's key focus on the urban extension to the northern edge of the Black Country conurbation in proximity to railway stations and existing facilities makes Option F primarily more aligned with local infrastructure. Option F clearly promotes the use of sustainable infrastructure, whereas Option G includes a proposed urban extension along the A449 corridor, which does not promote the use of sustainable travel opportunities. This is particularly relevant seeing as Table G.3.1 in Appendix G of the 2022 Reg 19 SA explains that a 'Climate Change Adaptation and Mitigation' (CCAM) study (AECOM, October 2020) has been undertaken to inform the development of energy and sustainability policies across Staffordshire and the eight constituent Local Authorities. The study found that 53.8% of South Staffordshire's energy is sourced from petroleum products and indicates that reducing the need to travel and promoting sustainable transport options could make a substantial contribution to reducing greenhouse gas emissions. The 2022 Reg 19 SA maintains that the spatial strategy aims to locate development primarily where new residents would have better access to existing services and facilities and access to sustainable transport, including railway stations, where possible. Like the previous iteration, the 2022 Reg 19 SA says that this approach has the potential to reduce greenhouse gas emissions in comparison with an approach which requires a more dispersed pattern of development. The reasonable alternatives identified within the SSLPR more dispersed pattern of development set out in Option G, compared to Option F, it remains unclear how the option selection process aligns with this.</p> <p>It is unclear as to how the assessment at the Issues and Options SA stage has informed the assessments in the Spatial Housing Strategy and Infrastructure Delivery SA Report and whether actually, the best option has been selected to be taken forwards through</p>
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TABLE 2.1: SUSTAINABILITY APPRAISAL COMPLIANCE REVIEW

	<p>the SA process or not. Section 3.16.5 of the Issues and Options SA Residential Spatial Distribution: Option B (rural housing growth) highlights that development delivered towards rural locations where the air quality is likely to be better than air quality in larger settlements and urban areas could risk worsening air quality (SA Objective 5) and further identifies that development at a large number of greenfield sites would be expected to result in a net loss of agriculturally and ecologically valuable soils (a significant majority of soils in the District are Grades 2 and 3 soils, and therefore it's likely that this would result in a net loss of Best and Most versatile (BMV) soils. Section 3.17 of the Issues and Options SA Residential Spatial Distribution: Option C for housing spatial options - scores positively for SA Objectives 1 Climate Change Mitigation, 2 Climate Change Adaptation, 8 Health and Wellbeing, 9 Cultural Heritage, 10 Transport and Accessibility and only minor negative for SA Objective Landscape and Townscape. This option proposes small-scale urban extensions adjacent to the neighbouring urban areas which South Staffordshire borders. The SA explains that much of the unmet needs in the GBHMA which South Staffordshire sits within come from the urban areas of Birmingham and the Black Country. Therefore, sites adjacent to the urban areas which neighbour the district offer a sustainable option to deliver housing supply to meet unmet housing needs. It may also offer an opportunity to create housing sites in locations which 'round off' an existing urban edge, minimising encroachment of the urban area into the green belt. Furthermore, the SA states that by directing housing sites to locations adjacent to existing towns and cities north and east of South Staffordshire, this would be likely to help ensure that new residents have excellent access to public transport links and the PRoW network, helping to reduce greenhouse gas emissions caused by road transport increases. In addition, adverse impacts on sensitive biodiversity designations will be avoided and this strategy would locate sites adjacent to existing residential development which would be in keeping and therefore unlikely to alter the local character or setting of heritage assets. Section 3.18 of the Issues and Options SA Residential Spatial Distribution: Option D (larger urban extensions on the fringe of neighbouring urban areas) is given similar scores to Option C above and states that three known employment led sites for this option would be situated in close proximity to railway stations. The above can be compared to Section 3.20 of the Issues and Options SA Residential Spatial Distribution: Option F, which looks to intensify development within the existing village development boundaries. This options scores a lot worse for most SA Objectives. Spatial Option G was selected as the best-performing option, with the SA concluding that the proposed development under this option would be likely to result in the greatest positive sustainability impacts. Given the above, which seems to support the principles of development north of the Black Country conurbation as set out in Spatial Option F more so than Option G, it is unclear how this conclusion was reasonably reached. The above raises questions as to whether the best / all alternatives have been appraised in the 2022 Reg 19 SA.</p> <p>An appraisal was undertaken in the 2021 Reg 18 (III) SA of the potential development site 'Land at Yieldfields, Bloxwich', it is clear that a) Bloxwich justifiably represents a sustainable location for housing and b) Bloxwich should be included within any proposed site allocations within the SSLPR based on its sustainability credentials. The site Land at Yieldfields, Bloxwich is suitably located in proximity to local facilities, public transport, employment opportunities and green spaces, and will add to the current services available in the area through the provision of approximately 900 homes, a primary school, public open space and recreational opportunities and allotments. The closest bus stops are located 650m from the site, whilst the closest rail station is located 1.8km from the site; both are easily accessible via the local road and pedestrian networks, reducing the reliance on private vehicular access, and resultant emissions. There are also several PRoW in proximity of the site which future development could connect with in order to improve sustainable accessibility and connectivity to the wider area. The site has the potential to retain and enhance elements of the landscape, green infrastructure network and pedestrian and cycling routes in the existing and new community, providing benefits in relation to several objectives, including climate change mitigation and adaptation, biodiversity, health and wellbeing and economy and employment. Enhancement of the green infrastructure network will also provide benefit to the local Green Belt, by further supporting barriers to urban sprawl, and biodiversity features onsite through the provision of enhanced habitat and foraging provision. Further afield, statutory and non-statutory ecological designations outside of the site footprint are not expected to be adversely affected by the future development due to their distance from site, and intervening development. The site presents the opportunity to contribute to green corridors in the area, linking up networks of green spaces, including the canal corridor to the west. The cumulative beneficial impacts of these points altogether should also be assessed. The above is contrasted to those reasonable alternative sites selected in the 2022 Reg 19 SA based on Option G of the Spatial Housing Strategy and Infrastructure Delivery SA Report, including those sites at Pattington, Kinver, and other more rural locations.</p> <p>Appendix 2 of the 2021 Reg 18 (III) SA demonstrates that Land at Yieldfields, Bloxwich scores considerably better (more positively) than Policy SA3: Strategic development location: Land north of Linthouse Lane which has been identified in the 2021 for major housing growth, for the reasons outlined above. Land north of Linthouse Lane is awarded just four positive scores against the 12 SA Objectives. Land north of Linthouse Lane does not have the benefit of being within close proximity to a railway station, with the nearest being Bloxwich North, located over 5km to the east. Therefore, new residents would likely rely heavily on private car use for means of transport to access employment and community facilities, increasing emissions and effects on climate change and health. Land north of Linthouse Lane is given a score of uncertain for SA Objective 1 Climate Change Mitigation, however given the above we consider this should be given a negative score due to the lack of sustainable transport options. Land north of Linthouse Lane is relatively isolated in terms of existing green spaces, and it is unclear how any proposed green infrastructure would link with existing networks to create meaningful corridors and connections for the benefit of biodiversity habitats as well as human health and</p>
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TABLE 2.1: SUSTAINABILITY APPRAISAL COMPLIANCE REVIEW

		<p>wellbeing. The reasons put forwards for development at Land north of Linthouse Lane include that this location is well connected to the Black Country urban area which means residents will have good access to services and employment opportunities in the adjacent towns and cities. Land at Yieldfields, Bloxwich is closer to the nearest Town Centre (Bloxwich) than Land north of Linthouse Lane is to the nearest large hub (Wolverhampton, approximately 4km southwest of Land north of Linthouse Lane). Given the scoring for Land at Yieldfields, Bloxwich which demonstrates that this site achieves the above and scores better against the SA Objectives, it remains unclear why this site has not been included within the SA as a reasonable alternative for development. Therefore, the objectivity and parity of the assessment when assigning scores could be questioned. It is concluded that there are more suitable sites within the Plan area that have not been adequately considered or included for allocation when it is clear from this review that the SSLPR should prioritise development in such locations.</p> <p>Upon undertaking assessments of potential strategic locations, the SA should consider design measures such as the creation of pedestrian and cycling infrastructure, green space, future proofing to increase mitigation of and adaptation to climate change (for example, co-location of uses to reduce car dependence, the Future Homes Standard, embedding green infrastructure to encourage healthy lifestyles, active travel, biodiversity gain and natural cooling and shading) and the standard mitigation measures such as the implementations of CEMP, in accordance with appropriate legislation and best practice for development sites, which would mitigate construction effects from noise, air quality and traffic and minimise the likelihood of significant adverse effects arising. The SA process should be iterative so that as further information becomes available, a more detailed appraisal is undertaken, which should have been brought forward at the Regulation 19 stage. A whole Plan assessment and the cumulative effects (including beneficial effects) of the allocations and policies altogether should also be considered when assessing the sustainability of the options.</p> <p>The concluding sections of the 2022 Reg 19 SA could be stronger, for example by better setting out the selected, preferred options. It could be made clearer how the SA assessments were used to decide the preferred options, for example, was this based on the number of positive versus negative scores? Emphasis should be given to the reasons for selecting the preferred options based on the impacts on the topics in the SA Objectives.</p> <p>Section 4 of the 2022 Reg 19 SA sets out the assumptions, uncertainties and limitations of predicting effects, including the reliance on expert judgement, the influence on a range of factors such as the design and success of mitigation measures, ensuring alternatives were appraised consistently and reliance on the best available information, including that provided by the Council and information that is publicly available. Appendix D of the 2022 Reg 19 SA describes the assumptions that were made for specific topics of the SA Objectives Assessments, to ensure that assessments are consistent. The 2022 Reg 19 SA states that for the assessment of development proposals, up-to-date ecological surveys and/or landscape and visual impact assessments have not been available. It should be clarified when these will be available and where they can be accessed, for transparency.</p>
<p>9. A description of the measures envisaged concerning monitoring in accordance with regulation 17.</p>		<p>The 2022 Reg 19 SA includes a Chapter specific to monitoring, in accordance with Regulation 17 of the SEA regulations that state that <i>"the responsible authority shall monitor significant effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able undertake appropriate remedial action"</i>.</p> <p>The 2022 Reg 19 SA identifies the indicators for each of the SA Objectives used in the SA process, the scale and frequency in which they will be measured and topic-specific targets.</p> <p>It would be useful if the current trends for each of the monitoring indicators were detailed.</p>
<p>10. A non-technical summary of the information provided under paragraphs 1 to 9.</p>		<p>The 2022 Reg 19 SA includes a Non-Technical Summary (NTS), as separate from the main body of the report (Volume 1 of 3). The information contained within the 2022 Reg 19 SA is therefore accessible to the non-technical reader / general public. The NTS is written in a language that is easily understood and summarises all key parts of the process, conclusions and next steps.</p> <p>The NTS could be improved by providing concise reasons as to the selecting the preferred options based on the impacts on the topics in the SA Objectives, rather than pointing the reader to Appendix H of the 2022 Reg 19 SA Report.</p>

Planning & Compulsory Purchase Act 2004 - Section 19 Requirements for SA

Stages from Planning Practice Guidance Paragraph: 013 Reference ID: 11-013-20140306. PPG paragraph references provided below, where relevant.

A Setting the context and objectives, establishing the baseline and deciding on the scope

TABLE 2.1: SUSTAINABILITY APPRAISAL COMPLIANCE REVIEW		
Identifying relevant policies, plans and programmes		<p>Covered in Sections 1, 2, 3-14 and Appendix B of the 2017 SA Scoping Report, Section 1 of the Issues and Options SA Report, Section 1 of the 2021 Reg 18 (III) SA and Section 1 of the 2022 Reg 19 SA.</p> <p>See detailed commentary within response to question 1 above.</p>
Collecting baseline information		<p>Covered in Sections 2-14 of the 2017 SA Scoping Report and Sections 1 and 3 of the 2021 Reg 18 (III) SA, Sections 3 and 7-15 of the 2022 Reg 19 SA.</p> <p>The baseline data review has been updated since the 2017 SA Scoping Report was published.</p> <p>See detailed commentary within response to questions 2 and 3 above.</p>
Identifying environmental and sustainability issues		<p>Covered in Sections 5 and 16 of the 2017 SA Scoping Report, Sections 2, 3, 4, Appendices A, B, C and D of the 2021 SA, Sections 4, 5,7-15, Appendices B, F, G and I of the 2022 Reg 19 SA Report.</p>
Identifying appraisal objectives		<p>Covered in 2017 SA Scoping Report, Sections 1, 2, 4 and 5 of the 2021 SA and Sections 1, 2 and 4 of the 2022 Reg 19 SA.</p> <p>Appendix D of the Reg 19 2022 SA outlines the SA Framework, including the SA Objectives, decision making criteria and indicators used to assess the alternatives for likely significant effects on the environment. Appendices F and G and I of the Reg 19 2022 SA show the SA matrices' results and the likely significant effects of the sites and policy options considered to date for the Plan.</p>
Consulting on the scope of the appraisal		<p>Covered in 2017 SA Scoping Report, Section 1 of the 2021 SA and Sections 2 and 4 and 5 of the 2022 Reg 19 SA.</p> <p>Section 2.3.3 of the 2022 Reg 19 SA explains that statutory consultees including Historic England, Natural England, the Environment Agency and other relevant bodies were consulted on the content of the SA Scoping report and that the comments received were taken into consideration and the SA Scoping Report amended where appropriate. There were also subsequent comments made on the Issues and Options SA Report and the Spatial Housing Strategy and Infrastructure Delivery SA Report. Table 1.2 of the Spatial Housing Strategy and Infrastructure Delivery SA Report notes the comments provided by the Environment Agency, Natural England and Historic England in response to the Issues and Options SA Report and how these have been incorporated into the Spatial Housing Strategy and Infrastructure Delivery SA Report, which is helpful.</p> <p>Compared to the previous iteration of the SA, Appendix C of the 2022 Regulation 19 SA sets out consultation comments received from statutory consultees in response to the SA's to date. Which strengthens the process and makes it more consistent and robust. As stated for Compliance Objective 1 above, it remains unclear if these were the only interested parties to comment and this reporting does not appear to have been followed through at the next stage of the SA process.</p>
B Developing and refining options and assessing effects		
<p>Developing and refining the alternative options for the plan</p> <p>Paragraph: 018 Reference ID: 11-018-20140306</p>		<p>Covered in 2017 SA Scoping Report, Issues and Options SA Report, Spatial Housing Strategy and Infrastructure Delivery SA Report, the 2021 Reg 18 (III) Report and Sections 2, 4, 5, 6 and Appendices F, G, H, I of the 2022 Reg 19 SA Report.</p> <p>See detailed commentary within response to Compliance Question 8 above.</p>
Predicting and evaluating the significant effects of the options and alternatives		<p>Covered in 2017 SA Scoping Report, Issues and Options SA Report, Spatial Housing Strategy and Infrastructure Delivery SA Report, the 2021 Reg 18 (III) Report and Sections 2, 4, 5, 6 and Appendices F, G, H, I of the 2022 Reg 19 SA Report.</p> <p>Appendix B of the Reg 19 SA Report outlines the SA Framework, including SA Objectives, decision making criteria and indicators. The SA Framework (comprising the Sustainability Objectives agreed during Scoping) has been used to assess the SSLPR's reasonable alternative sites including housing, employment, and Gypsy and Traveller sites (set out in Section 6, Appendix G shows the SA matrices' results) and the Strategic Policies and Development Management Policies (set out in Section 6, Appendix I shows the matrices' results) for likely significant effects on the environment.</p> <p>See detailed commentary within response to Compliance Question 8 above.</p>
Considering ways of mitigating adverse effects and maximising beneficial impacts		<p>Covered in 2017 SA Scoping Report, the 2021 Reg 18 (III) SA, and Section 6 and Appendix G of the 2022 Reg 19 SA.</p> <p>See detailed commentary within response to Compliance Question 7 above.</p>
Proposing measures to monitor significant effects		<p>Compared to previous iterations, the 2022 Reg 19 SA includes a section on monitoring significant effects.</p>

TABLE 2.1: SUSTAINABILITY APPRAISAL COMPLIANCE REVIEW		
Paragraph: 025 Reference ID: 11-025-20140306		See detailed commentary within response to Compliance Question 9 above.
C. Preparing the Sustainability Report - Including the SEA Requirements		
		Some further improvements suggested, as set out above.
D. Seek representations on the SA report from consultation bodies and the public		
Paragraph: 020 Reference ID: 11-020-20140306		Covered in 2017 SA Scoping Report, 2021 Reg 18 (III) SA and Section 2 of the Reg 19 SA Report.
E. Post adoption reporting and monitoring		
Paragraph: 025 Reference ID: 11-025-20140306	N/A	To be done after adoption of the SSLPR.

REFERENCES

- ⁱ South Staffordshire Council (November 2022) – Local Plan Review – Publication Plan (Regulation 19)
- ⁱⁱ Lepus Consulting (October 2022), Sustainability Appraisal of the South Staffordshire Local Plan Review 2019-2039
- ⁱⁱⁱ Lepus Consulting on behalf of South Staffordshire Council (November 2017) Sustainability Appraisal of the South Staffordshire Local Plan Review, Scoping Report.
- ^{iv} Lepus Consulting (2018) Sustainability Appraisal of the South Staffordshire Local Plan Review: Issues and Options
- ^v Lepus Consulting (2019) Sustainability Appraisal of the South Staffordshire Local Plan Review: Spatial Housing Strategy and Infrastructure Delivery
- ^{vi} Lepus Consulting (2021) Sustainability Appraisal of the South Staffordshire Local Plan Review: Preferred Options Plan, Regulation 18 (III) SA Report
- ^{vii} Barton Willmore, now Stantec (December 2021), Review of the Sustainability Appraisal supporting the South Staffordshire Local Plan Review Preferred Options Regulation 18 III Consultation