

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

Addendum to the Regulation 19 SA Report
to support the Submission of the LPR
(Regulation 22)

November 2024



LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

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Client comments can be sent to Lepus using the following address:

Eagle Tower
Montpellier Drive
Cheltenham
Gloucestershire
GL50 1TA

Telephone: 01242 525222

E-mail: enquiries@lepusconsulting.com

Website: www.lepusconsulting.com

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Acronyms & abbreviations

AONB	Area of Outstanding Natural Beauty
DLUHC	Department for Levelling Up, Housing and Communities
DM	Development Management
EDNA	Economic Development Needs Assessment
HER	Historic Environment Record
HLC	Historic Landscape Characterisation
LPA	Local Planning Authority
LPR	Local Plan Review
MHCLG	Ministry of Housing, Communities and Local Government
MOU	Memorandum of Understanding
NNR	National Nature Reserve
NPPF	National Planning Policy Framework
PPG	Planning Practice Guidance
PPP	Policies, Plans and Programmes
RTPI	Royal Town Planning Institute
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SAD	Site Allocation Document
SEA	Strategic Environmental Assessment
SFRA	Strategic Flood Risk Assessment
SHSID	Spatial Housing Strategy and Infrastructure Delivery
SSDC	South Staffordshire District Council
SSSI	Sites of Special Scientific Interest
SuDS	Sustainable Drainage System

1 Introduction

1.1 Purpose of this report

- 1.1.1 Lepus Consulting Ltd (Lepus) has been instructed by South Staffordshire District Council (SSDC) to undertake a Sustainability Appraisal (SA) process, incorporating the requirements of Strategic Environmental Assessment (SEA), for the South Staffordshire Local Plan Review (LPR) (2023–2041).
- 1.1.2 Following the consultation of the Regulation 19 Publication Version of the South Staffordshire LPR between 18th April and 31st May 2024¹, SSDC has proposed a number of minor changes to the content of the Local Plan to form the Submission Version of the LPR that will be submitted to the Secretary of State for independent examination.
- 1.1.3 This SA document has been prepared to evaluate SSDC's proposed 'minor modifications' to the South Staffordshire LPR² and forms an Addendum to the Regulation 19 SA Report published in March 2024³.
- 1.1.4 This SA Addendum forms the latest stage of a series of reports that have been prepared to document the iterative SA process. Such an approach enables the Council to demonstrate that it has identified, described and evaluated reasonable alternatives during the making of the Local Plan. **Chapter 2** provides further details of the SA process to date.

1.2 Sustainability Appraisal

- 1.2.1 A sustainability appraisal (SA) is a systematic process that must be carried out during the preparation of local plans and spatial development strategies⁴. The role of SA is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.
- 1.2.2 The SA process provides an opportunity to consider ways by which the plan can contribute to sustainability improvements, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have. By doing so, it can help make sure that the proposals in the plan are appropriate when compared to reasonable alternatives. It can be used to test the evidence underpinning the plan and help to demonstrate how the tests of soundness have been met. SA should be applied as an iterative process informing the development of the plan.

¹ SSDC (2024) South Staffordshire Publication Plan (Regulation 19) April 2024. Available at: <https://www.sstaffs.gov.uk/planning/planning-policy/publication-plan-2024> [Date accessed: 21/11/24]

² SSDC (2024) South Staffordshire Local Plan Review: Publication Plan – Schedule of Minor Modifications to the South Staffordshire Local Plan (2023–2041)

³ Lepus Consulting (2024) Sustainability Appraisal of the South Staffordshire Local Plan Review (2023-2041): Regulation 19 SA Report Volume 1-3. March 2024. Available at: <https://www.sstaffs.gov.uk/planning/planning-policy/local-plan-review-evidence-base> [Date accessed: 21/11/24]

⁴ DLUHC and MHCLG (2021) Government guidance on plan making. Available at: <https://www.gov.uk/guidance/plan-making> [Date accessed: 21/11/24]

1.3 Strategic Environmental Assessment

- 1.3.1 Strategic Environmental Assessment (SEA) seeks to ensure that environmental considerations are part of the process of preparing certain plans and programmes. Its purpose is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes, with a view to promoting sustainable development. SEA considers only the environmental effects of a plan, whereas sustainability appraisal considers the plan's wider economic and social effects in addition to its potential environmental impacts⁵.
- 1.3.2 In the SEA procedure, an environmental report is prepared in which the likely significant effects on the environment of the proposed plan or programme and its reasonable alternatives are identified. The public and relevant environmental authorities are informed and consulted on the draft plan or programme and the environmental report.

1.4 Legislative context

- 1.4.1 The SEA Directive applies to a wide range of public plans and programmes, including land use plans (see Article 3(2)) of the SEA Directive⁶). The Directive has been transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations, SI no. 1633⁷).
- 1.4.2 SEA is a systematic process for evaluating the environmental consequences of proposed plans or programmes to ensure environmental issues are fully integrated and addressed at the earliest appropriate stage of decision-making. The SEA Directive and SEA Regulations require an environmental report in which the likely significant effects on the environment are identified for local plan proposals and reasonable alternatives.
- 1.4.3 SA is a UK-specific procedure used to appraise the impacts and effects of development plans in the UK. It is required by S19 (5) of the Planning and Compulsory Purchase Act 2004 and should be an appraisal of the economic, social and environmental sustainability of development plans. The present statutory requirement for SA lies in The Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.4.4 Planning Practice Guidance (PPG) on SEA and SA⁸ states: "*Sustainability appraisals incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (commonly referred to as the 'Strategic Environmental Assessment Regulations'). Sustainability appraisal ensures that potential environmental effects are given full consideration alongside social and economic issues*".

⁵ DLUHC and MHCLG (2020) Strategic environmental assessment and sustainability appraisal. Available at: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal> [Date accessed: 21/11/24]

⁶ Directive 2001/42/EC of the European Parliament of the Council of 27 June 2001 (SEA Directive). Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32001L0042> [Date accessed: 21/11/24]

⁷ The Environmental Assessment of Plans and Programmes Regulations (2004). Available at: <http://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date accessed: 21/11/24]

⁸ MHCLG (2020) Guidance: Strategic environmental assessment and sustainability appraisal. Available at: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal> [Date accessed: 21/11/24]

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- 1.4.5 When submitting their local plan to the Secretary of State, section 19(5) of the Planning and Compulsory Purchase Act⁹ requires that local planning authorities (LPAs) must have prepared and be able to submit an SA at the same time.
- 1.4.6 Having earlier this year (between 18th April and 31st May 2024¹⁰) undertaken a consultation at the plan-making stage Regulation 19, known as 'Publication' in the Local Plan Regulations 2012¹¹ and as shown in Stage C of **Figure 1.2**, SSDC are intending to submit the South Staffordshire LPR for independent examination by the end of 2024. This is known as 'Submission' and relates to Regulation 22 of the Local Plan Regulations.

⁹ Planning and Compulsory Purchase Act 2004. Available at: <https://www.legislation.gov.uk/ukpga/2004/5/contents> [Date accessed: 21/11/24]

¹⁰ SSDC (2024) South Staffordshire Publication Plan (Regulation 19) April 2024. Available at: <https://www.sstaffs.gov.uk/planning/planning-policy/publication-plan-2024> [Date accessed: 21/11/24]

¹¹ The Town and Country Planning (Local Planning) (England) Regulations 2012. SI 767.

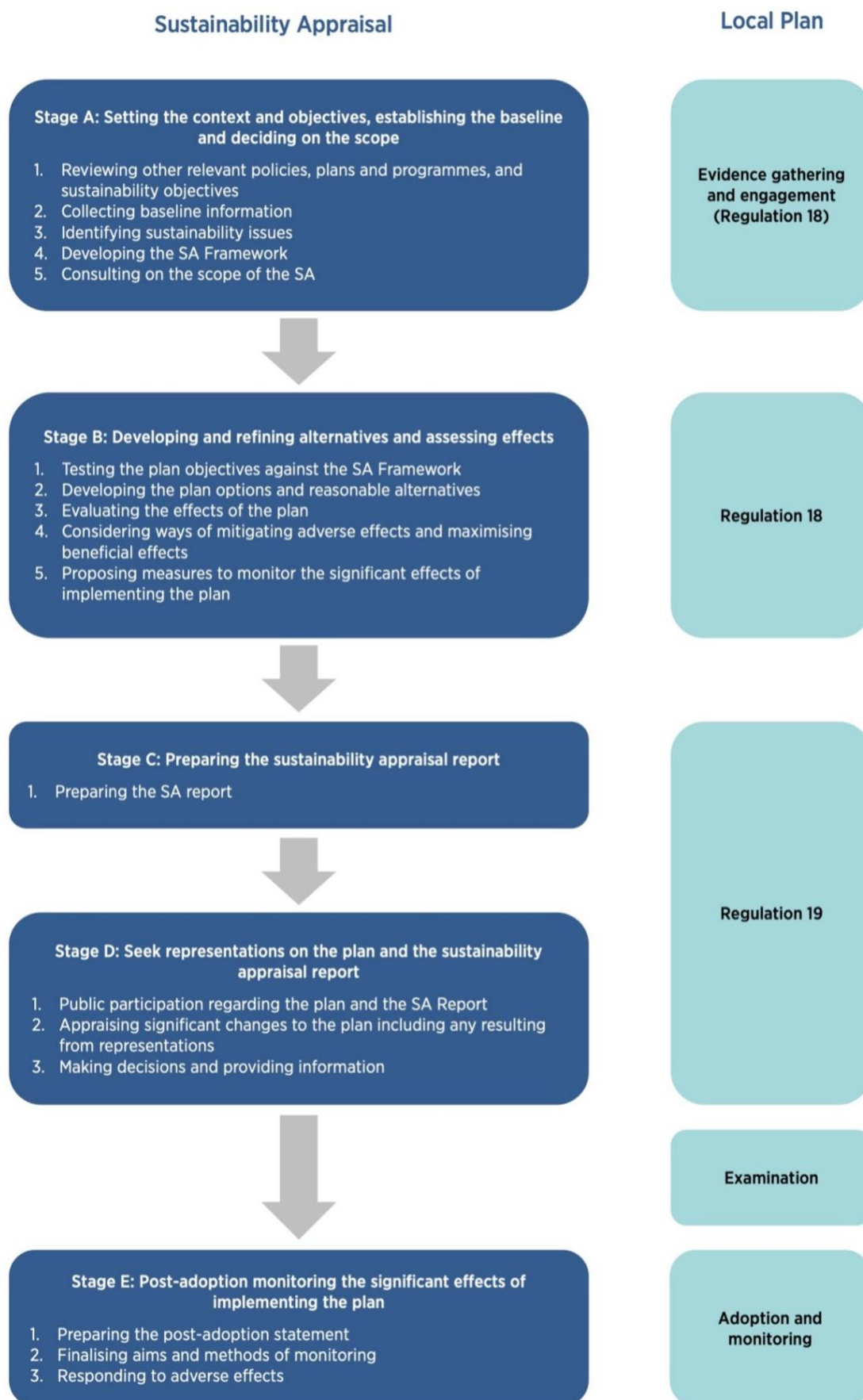


Figure 1.1: Sustainability appraisal process alongside local plan stages

1.5 How to read and understand this document

1.5.1 This report should be read alongside the Regulation 19 Publication Version (2024) of the South Staffordshire LPR and the Regulation 19 SA (2024).

1.5.2 The contents of this SA Report are as follows:

- **Chapter 1** (this chapter) provides an overview of the purpose of this SA Addendum and the requirement for SA and SEA;
- **Chapter 2** summarises the SA and LPR process to date;
- **Chapter 3** provides a summary of the methodology used in the SA process for context (see the Regulation 19 SA report for the full methodology);
- **Chapter 4** provides a screening of the Council's proposed minor modifications to the LPR and whether this will change any conclusions of the Regulation 19 SA (2024);
- **Chapter 5** provides an overview of the conclusions of the SA Addendum and outlines the next steps towards submission of the LPR.

2 Sequencing of the LPR and SA process

2.1 The South Staffordshire Local Plan Review

2.1.1 The UK government requires local plans to be reviewed every five years and updated as necessary. The current adopted Local Plan for South Staffordshire consists of the Core Strategy and the Site Allocations Document (SAD)¹². The South Staffordshire LPR will update and replace these documents and will set out the overall strategy for development in the district to 2041, including a vision for the future, relevant objectives, site allocations, site-based policies and development management policies which will guide the determination of planning applications.

2.1.2 During the Local Plan preparation process, SSDC has conducted three rounds of Regulation 18 consultation:

- The Issues and Options Consultation (2018) was the first stage of the LPR (known as Regulation 18 (I))¹³.
- The Spatial Housing Strategy and Infrastructure Delivery (SHSID) Consultation (2019)¹⁴ was the second stage of the LPR (known as Regulation 18 (II)), which refined the spatial options assessed at the Issues and Options stage and provided an opportunity to consult with the public on the spatial strategy alternatives.
- The third stage of LPR preparation was the Preferred Options Consultation (2021)¹⁵ (known as Regulation 18 (III)), which set out proposed sites for housing, employment and the Gypsy and Traveller community, and included new policies and policy directions.

2.1.3 Following completion of the Preferred Options Consultation in December 2021, SSDC progressed work on the Publication version of the LPR for the Regulation 19 stage. Two rounds of Regulation 19 consultation have been held:

- The Regulation 19 Publication Plan that was published for consultation between 11th November and 23rd December 2022¹⁶.

¹² Adopted South Staffordshire Local Plan. Available at: <https://www.sstaffs.gov.uk/planning/planning-policy/adopted-south-staffordshire-local-plan> [Date accessed: 21/11/24]

¹³ SSDC (2018) South Staffordshire Local Plan Issues and Options. October 2018. Available at: <https://www.sstaffs.gov.uk/planning/planning-policy/local-plan-review/issues-and-options> [Date accessed: 21/11/24]

¹⁴ SSDC (2019) South Staffordshire Local Plan Spatial Housing Strategy and Infrastructure Delivery. October 2019. Available at: <https://www.sstaffs.gov.uk/planning/planning-policy/local-plan-review/spatial-housing-strategy-and-infrastructure-delivery-shsid> [Date accessed: 21/11/24]

¹⁵ SSDC (2021) South Staffordshire Local Plan Preferred Options. November 2021. Available at: <https://www.sstaffs.gov.uk/planning/planning-policy/local-plan-review/preferred-options> [Date accessed: 21/11/24]

¹⁶ SSDC (2022) South Staffordshire Publication Plan (Regulation 19) November 2022. Available at: <https://www.sstaffs.gov.uk/planning/planning-policy/local-plan-review/publication-plan> [Date accessed: 21/11/24]

- A second iteration of the Publication Version of the LPR was published for consultation between 18th April and 31st May 2024¹⁷, taking into account changes to national planning policy and other evidence updates.

2.2 SA alongside the LPR stages: Iteration

Scoping

2.2.1 The preparation of a Scoping Report was the first phase of the SA process. The scoping process set the criteria for assessment (including the SA Objectives) and established the baseline data and other information, including a review of relevant policies, programmes and plans (PPPs). The scoping process involved an overview of key issues, highlighting areas of potential conflict. The output of the scoping phase was the SA Scoping Report prepared by Lepus Consulting in 2017¹⁸.

2.2.2 Between November and December 2017, the content of the SA Scoping Report was consulted on with Historic England, Natural England, the Environment Agency and other relevant bodies. The Scoping Report was revised following consideration of the comments received and re-issued to the Council in 2018.

Regulation 18

2.2.3 The Regulation 18 (I) Issues and Options SA Report¹⁹ assessed five options for levels of residential growth, two options for Gypsy and Traveller growth, three options for employment growth, six options for residential distribution, four options for employment distribution and 34 options for policies to be included in the LPR.

2.2.4 The Regulation 18 (II) SA Report²⁰ set out the appraisal of seven spatial options, as identified in the Spatial Housing Strategy and Infrastructure Delivery document. These spatial options constitute reasonable alternatives for the distribution of new housing growth in the Plan area.

2.2.5 The Regulation 18 (III) SA Report²¹ included an assessment of 40 draft Development Management (DM) 'direction of travel' policies, 11 draft strategic policies and 317 reasonable alternative sites. The SA report also set out the preliminary reasons for selecting and rejecting reasonable alternative sites.

¹⁷ SSDC (2024) South Staffordshire Publication Plan (Regulation 19) April 2024. Available at: <https://www.sstaffs.gov.uk/planning/planning-policy/publication-plan-2024> [Date accessed: 21/11/24]

¹⁸ Lepus Consulting (2017) Sustainability Appraisal of the South Staffordshire Local Plan Review: Scoping Report. Available at: https://www.sstaffs.gov.uk/sites/default/files/2023-02/sa_scoping_report_2017.pdf [Date accessed: 21/11/24]

¹⁹ Lepus Consulting (2018) Sustainability Appraisal of the South Staffordshire Local Plan Review: Issues and Options. Available at: https://www.sstaffs.gov.uk/sites/default/files/2023-02/sustainability_appraisal_sa_sea_issues_and_options_2018.pdf [Date accessed: 21/11/24]

²⁰ Lepus Consulting (2019) Sustainability Appraisal of the South Staffordshire Local Plan Review: Spatial Housing Strategy and Infrastructure Delivery. Available at: https://www.sstaffs.gov.uk/sites/default/files/2023-02/sustainability_appraisal_sa_sea_shsid_2019.pdf [Date accessed: 21/11/24]

²¹ Lepus Consulting (2021) Sustainability Appraisal of the South Staffordshire Local Plan Review: Preferred Options Plan, Regulation 18 (III) SA Report. Available at: https://www.sstaffs.gov.uk/sites/default/files/2023-02/sustainability_appraisal_sa_sea_preferred_options_2021.pdf [Date accessed: 21/11/24]

Regulation 19

- 2.2.6 The Regulation 19 SA Report (2022)²² included a summary of the SA process to date and was prepared to meet the requirements of an SEA Environmental Report. The report set out the assessment of 55 LPR policies and proposed allocations, as well as 48 new/amended reasonable alternative sites for housing and employment use, and ten additional reasonable alternative sites for Gypsies and Travellers which had been identified since the Regulation 18 (III) stage. The report also set out the outline reasons for selecting and rejecting reasonable alternative sites considered throughout the SA process at the time of its preparation.
- 2.2.7 The updated Regulation 19 SA Report (2024)²³ included an updated summary of the SA process to date and was prepared to help inform the examination stage of the preparation of the LPR, taking into account the amendments to the LPR proposed since the preparation of the initial Regulation 19 SA in October 2022. The SA Report set out the assessment of the LPR policies and allocations (some of which had been amended since the 2022 Regulation 19 stage) as well as additional reasonable alternatives which have been identified since the previous stage: 11 new/amended reasonable alternative sites for housing and employment use; two additional residential growth options; and two additional spatial options.

²² Lepus Consulting (2022) Sustainability Appraisal of the South Staffordshire Local Plan Review (2019-2039): Regulation 19 SA Report Volume 1-3. October 2022. Available at: <https://www.sstaffs.gov.uk/planning/planning-policy/local-plan-review-evidence-base> [Date accessed: 21/11/24]

²³ Lepus Consulting (2024) Sustainability Appraisal of the South Staffordshire Local Plan Review (2023-2041): Regulation 19 SA Report Volume 1-3. March 2024. Available at: <https://www.sstaffs.gov.uk/planning/planning-policy/local-plan-review-evidence-base> [Date accessed: 21/11/24]

3 Summary methodology

3.1 Introduction

3.1.1 This chapter provides a brief overview of the methodology used to inform the identification and assessment of potential effects in the SA process.

3.1.2 The detailed SA methodology is provided in the SA reports which accompanied the previous stages of Local Plan preparation.

3.1.3 The sustainability appraisal process uses objective geographic information relating to environmental receptors, the SA Framework (as defined in the SA Scoping Report²⁴) and established standards (where available) to help make the assessment decisions transparent and robust.

3.2 The SA Framework

3.2.1 The SA Framework is comprised of SA Objectives and decision-making criteria. Acting as yardsticks of sustainability performance, the SA Objectives are designed to represent the topics identified in Schedule 2 of the SEA Regulations²⁵.

3.2.2 The SA Objectives and the SEA topics to which they relate are set out in **Table 3.1**.

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

²⁴ Lepus Consulting (2017) Sustainability Appraisal of the South Staffordshire Local Plan Review: Scoping Report. Available at: https://www.sstaffs.gov.uk/sites/default/files/2023-02/sa_scoping_report_2017.pdf [Date accessed: 21/11/24]

²⁵ Schedule 2 of the SEA Regulations identifies the likely significant effects on the environment, including "issues such as (a) biodiversity, (b) population, (c) human health, (d) fauna, (e) flora, (f) soil, (g) water, (h) air, (i) climatic factors, (j) material assets, (k) cultural heritage including architectural and archaeological heritage, (l) landscape and (m) the interrelationship between the issues referred to in sub-paragraphs (a) to (l)."

Table 3.1: Summary of the SA Objectives

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

3.3 Best practice guidance

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

- European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment²⁶.
- Office of Deputy Prime Minister (2005) A Practical Guide to the SEA Directive²⁷.
- Department for Levelling Up, Housing and Communities (DLUHC) (2023) National Planning Policy Framework (NPPF)²⁸.
- DLUHC and Ministry of Housing, Communities & Local Government (MHCLG) (2023) Planning Practice Guidance (PPG)²⁹.
- Royal Town Planning Institute (RTPI) (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans³⁰.

3.4 Appraisal process

3.4.1 The purpose of this document is to provide an appraisal of the LPR including reasonable alternatives in line with Regulation 12 of the SEA Regulations³¹ which states that:

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

3.4.3 This document also provides information in relation to the likely characteristics of effects, as per the SEA Regulations (see **Box 3.1**).

²⁶ European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment. Available at: http://ec.europa.eu/environment/archives/eia/pdf/030923_sea_guidance.pdf [Date accessed: 21/11/24]

²⁷ Office of Deputy Prime Minister (2005) A Practical Guide to the SEA Directive. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf [Date accessed: 21/11/24]

²⁸ DLUHC (2023) National Planning Policy Framework, December 2023. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 21/11/24]

²⁹ DLUHC & MHCLG (2023) Planning practice guidance. Available at: <https://www.gov.uk/government/collections/planning-practice-guidance> [Date accessed: 21/11/24]

³⁰ RTPI (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans. Available at: <https://www.rtpi.org.uk/research/2018/january/strategic-environmental-assessment-seasa-for-land-use-plans/> [Date accessed: 21/11/24]

³¹ The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations). Available at: <https://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date accessed: 21/11/24]

Box 3.1: Schedule 1 of the SEA Regulations³²

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

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

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

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

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

3.5 Impact assessment and determination of significance

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

Sensitivity

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

3.5.3 A guide to the range of scales used in determining sensitivity is presented in **Table 3.2**. For most receptors, sensitivity increases with geographic scale.

³² The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations). Available at: <https://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date accessed: 21/11/24]

Table 3.2: Impact sensitivity

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

Magnitude

3.5.4 Magnitude relates to the degree of change the receptor will experience, including the probability, duration, frequency and reversibility of the impact. Impact magnitude has been determined on the basis of the susceptibility of a receptor to the type of change that will arise, as well as the value of the affected receptor (see **Table 3.3**).

Table 3.3: Impact magnitude

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

3.6 Significant effects

3.6.1 A single value from **Table 3.4** has been allocated to each SA Objective for each reasonable alternative. Justification for the classification of the impact for each SA objective is presented in an accompanying narrative assessment text for all reasonable alternatives that have been assessed through the SA process.

3.6.2 The assessment of impacts and subsequent evaluation of significant effects is in accordance with Schedule 2 (6) of the SEA Regulations³³, where feasible, which states that the effects should include: “*secondary, cumulative, synergistic, short, medium and long-term effects, permanent and temporary effects, positive and negative effects, cumulative and synergistic effects*”.

Table 3.4: Guide to scoring significant effects

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

3.6.3 When selecting a single value to best represent the sustainability performance, and to understand the significance of effects in terms of the relevant SA Objective, the precautionary principle³⁴ has been used. This is a worst-case scenario approach; if a positive effect is identified in relation to one criterion and a negative effect is identified in relation to another criterion within the same SA Objective, the overall impact has been assigned as negative for that objective. It is therefore essential to appreciate that the impacts provide only an indicative summary, and the accompanying assessment text provides a fuller explanation of the sustainability performance of the option.

³³ The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations). Available at: <https://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date accessed: 21/11/24]

³⁴ The European Commission describes the precautionary principle as follows: “If a preliminary scientific evaluation shows that there are reasonable grounds for concern that a particular activity might lead to damaging effects on the environment, or on human,

- 3.6.4 The assessment considers, on a strategic basis, the degree to which a location can accommodate change without adverse effects on valued or important receptors (identified in the baseline).
- 3.6.5 Significance of effect has been categorised as minor or major. **Table 3.4** sets out the significance matrix and explains the terms used to evaluate each reasonable alternative or proposal against each SA Objective of the SA Framework. The nature of the significant effect can be either positive or negative depending on the type of development and the design and mitigation measures proposed.
- 3.6.6 It is important to note that the assessment scores presented in **Table 3.4** are high level indicators. The assessment narrative text should always read alongside the significance scores. Likely impacts are not intended to be summed.
- 3.7 Limitations of predicting effects**
- 3.7.1 SA/SEA is a tool for predicting potential significant effects. Predicting effects relies on an evidence-based approach and incorporates expert judgement. It is often not possible to state with absolute certainty whether effects will occur, as many impacts are influenced by a range of factors such as the design and the success of mitigation measures.
- 3.7.2 The assessments in this report are based on the best available information, including that provided to Lepus by the Council and information that is publicly available. Every attempt has been made to predict effects as accurately as possible.
- 3.7.3 SA operates at a strategic level which uses available secondary data for the relevant SA Objective. All reasonable alternatives and preferred options are assessed in the same way using the same method. Sometimes, in the absence of more detailed information, forecasting the potential impacts of development can require making reasonable assumptions based on the best available data and trends. However, all options must be assessed in the same way and any introduction of site-based detail should be made clear in the SA report, as new data could potentially introduce bias and skew the findings of the assessment process.
- 3.7.4 The assessment of development proposals is limited in terms of available data resources. For example, up to date ecological surveys and/or landscape and visual impact assessments have not been available. Additionally, the appraisal of the LPR is limited in its assessment of carbon emissions, and greater detail of carbon data would help to better quantify effects.
- 3.7.5 All data used is secondary data obtained from the Council or freely available on the internet.

animal or plant health, which would be inconsistent with protection normally afforded to these within the European Community, the Precautionary Principle is triggered".

4 Screening of proposed minor modifications to the LPR

4.1 Overview

- 4.1.1 This chapter sets out SSDC's proposed minor modifications to the Publication version of the South Staffordshire LPR (2023–2041)³⁵, which was published for consultation between 18th April and 31st May 2024.
- 4.1.2 **Table 4.1** below replicates the Schedule of Minor Modifications³⁶ prepared by the Council, whereby the modifications are expressed in the form of ~~strike through~~ for deletions and **bold** for additions of text. An additional column has been included in the table as presented within this chapter to allow an assessment or 'screening' of the proposed modifications in the context of the SA.
- 4.1.3 The purpose of this chapter is to screen the proposed modifications to assess whether the modification would be likely to lead to a new potentially significant adverse effect, or whether the modification may lead to a change in the SA assessment of residual effects identified in the SA to date. The screening process also seeks to identify any potential beneficial effects of the proposed modifications.
- 4.1.4 Where no new significant effects are identified, the conclusions in the Regulation 19 SA Report (2024)³⁷ remain valid. If any of the proposed changes would give rise to potential for new significant effects to be introduced, these would need to be assessed through the SA process.

³⁵ SSDC (2024) South Staffordshire Publication Plan (Regulation 19) April 2024. Available at: <https://www.sstaffs.gov.uk/planning/planning-policy/publication-plan-2024> [Date accessed: 21/11/24]

³⁶ SSDC (2024) South Staffordshire Local Plan Review: Publication Plan – Schedule of Minor Modifications to the South Staffordshire Local Plan (2023–2041)

³⁷ Lepus Consulting (2024) Sustainability Appraisal of the South Staffordshire Local Plan Review (2023-2041): Regulation 19 SA Report Volume 1-3. March 2024. Available at: <https://www.sstaffs.gov.uk/planning/planning-policy/local-plan-review-evidence-base> [Date accessed: 21/11/24]

Table 4.1: Screening of proposed minor modifications to the South Staffordshire LPR to determine any implications for the SA

Minor Modification Reference Number	Page / Paragraph	Policy / Section	Proposed Change	Reason for Change	Relevant Representation (if applicable)	Will the proposed modification alter the conclusions of the R19 SA?
mm 001	Pg 9	Map 1	Amend Map 1 – Halfpenny Green Airport (plane symbol) moved to the east of 'Bobbington'.	Accurately reflect the location of the Airport	JMS Planning for Crump, D	No change. The modification provides visual context for the policy map.
mm 002	Pg 22, table 6	Strategic Objectives	Amend – Develop an economic strategy that seeks to retain existing employment and fosters sustainable economic growth, encouraging inward investment and job creation in key sectors such as advanced manufacturing and logistics and providing the skills to enable residents to access these jobs.	Adds clarity	CBRE	No change. The modification provides additional clarity to the strategic objectives of the Plan.
mm 003	Pg 50	Policy DS5: Spatial Strategy to 2041	Amend – The Spatial Strategy will be delivered through allocations made in this Local Plan and associated planning policies, ensuring development is sustainable, enhances the environment and provides any necessary mitigating or compensatory measures to address harmful implications. In all cases development should not conflict with the policies of the development plan.	Adds clarity and consistency with the NPPF	Avison Young for Crest Nicholson	No change. The modification removes superfluous text from Policy DS5 that cross-references to other policy requirements, and will not change the evaluation of the policy in the SA.
mm 004	Pg 55	Policy MA1: Master Planning Strategic Sites	Add to clause h) Development Phasing, Planning and Infrastructure Delivery Strategy - Conserve the significance of heritage assets, including their setting	Omission from Regulation 19 version of the plan	Historic England	No change. The modification introduces text that will strengthen the protection of heritage assets, but will not change the evaluation of Policy MA1 in the SA where a minor positive impact was already identified against SA Objective 9 (cultural heritage).

Minor Modification Reference Number	Page / Paragraph	Policy / Section	Proposed Change	Reason for Change	Relevant Representation (if applicable)	Will the proposed modification alter the conclusions of the R19 SA?
mm 005	Pg 55	Policy MA1: Master Planning Strategic Sites	Delete from clause i) A strategy for site wide Design Coding - Setting out the approach to formulating provable popular site wide and area (as appropriate) design coding, in keeping with the requirements of the National Model Design Code and accompanying National Model Design Guidance.	The terminology is unspecific and is not defined in the National Model Design Code or National Model Design Guidance	Lichfields for St Philips / Define Planning and Design for Bloor Homes	No change. The modification provides a minor update to terminology that will not change the evaluation of Policy MA1 in the SA.
mm 006	Pg 60	Policy SA2: Land North of Penkridge	Amend clause b) – A new first school (1.5ha) (1.2ha)	Staffordshire County Council have confirmed the required site area is 1.2ha	Define Planning and Design Ltd for Bloor Homes	No change. The modification introduces a minor change to the specific area to be covered by a new school, but no change to the provision of a school itself, which will not change the evaluation of Policy SA2 in the SA.
mm 007	Pg 60	Policy SA2: Land North of Penkridge	Amend clause e) – The provision of full-size sports pitches to meet national standard along with associated facilities to meet identified need of a type and size determined by up-to-date evidence, consultation with Sport England, and engagement with the local community.	As requested by owners / developers of the site in line with current planning application	Lichfields for St Philips / Define Planning and Design for Bloor Homes	No change. The modification will ensure that the type and size of new sports pitches and associated facilities will be determined by the latest evidence, but no change to the provision of sports pitches themselves, which will not change the evaluation of Policy SA2 in the SA.
mm 008	Pg 61	Policy SA2: Land North of Penkridge	Amend clause g) – Including an accessible central green space or spaces at the heart of the development.	As requested by owners / developers of the site in line with current planning application	Lichfields for St Philips / Define Planning and Design for Bloor Homes	No change. The modification removes reference to the central location of new green space, but no change to the provision of accessible green space itself, which will not change the evaluation of Policy SA2 in the SA.

Minor Modification Reference Number	Page / Paragraph	Policy / Section	Proposed Change	Reason for Change	Relevant Representation (if applicable)	Will the proposed modification alter the conclusions of the R19 SA?
mm 009	Pg 65	Policy SA3: Housing allocations (Site 730)	Amend – Village / Town: Great Wyrley Cheslyn Hay	Typographical error	N/A	No change. The modification corrects a typographical error within the policy.
mm 010	Pg 65	Policy SA3: Housing Allocations table (Site 285, 562 / 415, 459)	Amend – Minimum capacity (dwellings): 223 191	Capacity reduced due to the presence of electricity pylons and associated easements	Evolve for Lovell Homes	No change. The modification slightly reduces the minimum combined capacity of Sites 285, 562/415 and 459 that have been evaluated in the SA as reasonable alternative sites. This will not affect the evaluation of the sites, or of Policy SA3 itself, in the SA. (see also mm 063)
mm 011	Pg 65	Policy SA3: Housing Allocations table (Site 251)	Amend – Minimum capacity (dwellings): 47 15	Capacity and site area amended in line with landowners / developers detailed information	PlanIT for Hampton Oak Developments	No change. The modification slightly reduces the developable area and minimum capacity of Site 251 that has been evaluated in the SA as a reasonable alternative site. This will not affect the evaluation of the site, or of Policy SA3 itself, in the SA. (see also mm 066 and mm 067)

Minor Modification Reference Number	Page / Paragraph	Policy / Section	Proposed Change	Reason for Change	Relevant Representation (if applicable)	Will the proposed modification alter the conclusions of the R19 SA?
mm 012	Pg 77 – paragraph 7.7	Affordable Housing	Amend - Taking into account both South Staffordshire's need and the contribution to meeting unmet needs in the wider Housing Market Area, the Housing Market Assessment 2024 recommends approximately 29% of new housing delivered up to 2041 should be provided as affordable housing. This equates to a minimum of 1,371 affordable homes over the plan period. Just over half of this need is for rented homes, with the remainder split almost equally between First Homes and shared ownership.	Inclusion of the affordable housing target to allow for effective monitoring of affordable housing delivery	Tetlow King for WMHAPC	No change. The modification provides clarification and further context on the quantity of affordable homes to be provided but does not affect any policy content.
mm 013	Pg 80	Policy HC4: Homes for older people and others with special housing requirements	Amend – <ul style="list-style-type: none"> Bungalows Other age restricted single storey accommodation such as flats and maisonettes Sheltered / retirement living Extra care / housing with care and other supported living The category or categories of housing type from the above list that should be provided will be dependent on individual site circumstances.	Adds clarity - the type of homes for older people which should be provided (including which category or categories from the list in the policy) will be dependent on circumstances of each specific site, and the policy has been updated to reflect this	First City for St Mary's Presbytery and The Archdiocese of Birmingham	No change. The modification provides further clarity on the types of specialist homes that will be required on individual sites, but not the overall intention to provide such housing to meet identified needs, which will not change the evaluation of Policy HC4 in the SA.
mm 014	Pg 83	Policy HC6: Rural Exception Sites	Amend clause a) The site lies within or immediately adjacent to the development boundary of the settlement.	Adds clarity	RCA Regeneration for Barberry Developments	No change. The modification clarifies that rural exception sites can include those within as well as those adjacent to settlement boundaries, which will not change the evaluation of Policy HC6 in the SA.

Minor Modification Reference Number	Page / Paragraph	Policy / Section	Proposed Change	Reason for Change	Relevant Representation (if applicable)	Will the proposed modification alter the conclusions of the R19 SA?
mm 015	Pg 85	Policy HC7: First Homes Exception Sites	Amend – As an exception to planning policies relating to the location of housing development in the district, small exception sites of primarily First Homes to meet the needs of local people will be supported where all of the following criteria are met:	For consistency with the PPG, which specifies that First Homes can only be reserved for local people in line with Council criteria for a maximum period of three months	N/A	No change. The modification removes reference to the provision of homes for local people specifically, but no change to the general provision of First Homes, which will not change the evaluation of Policy HC7 in the SA.
mm 016	Pg 86	Policy HC7: First Homes Exception Sites	Amend clause f) – The initial and subsequent occupancy of properties is controlled through planning conditions and/or legal agreements to ensure the accommodation remains affordable and for local people in housing need in perpetuity	For consistency with the PPG, which specifies that First Homes can only be reserved for local people in line with Council criteria for a maximum period of three months	N/A	No change. The modification removes reference to the provision of homes for local people specifically, but no change to the general provision of First Homes, which will not change the evaluation of Policy HC7 in the SA.
mm 017	Pg 91	Policy HC10: Design Requirements	Amend point e) Ensures attractive and distinctive development with use of a variety of materials that will remain attractive through the lifetime of the development, and uses bespoke house types to avoid a monotonous visual appearance. Developments should make use of distinctive buildings and detailing to avoid a monotonous visual appearance, aid orientation and navigation as well as helping to create local character and familiarity.	Adds clarity	Acres Land and Planning for Hallam Land Management et al	No change. The modification introduces text that will strengthen the local character and distinctiveness, but will not change the evaluation of Policy HC10 in the SA where a minor positive impact was already identified against SA Objective 4 (landscape and townscape).
mm 018	Pg 92	Policy HC10: Design Requirements	Add – t) take a comprehensive and co-ordinated approach to development including respecting existing site constraints, including utilities situated within sites	Adds clarity and consistency with the NPPF	Avison Young for National Grid Electricity Transmission	No change. The modification provides clarity on how developers should address on-site constraints such as utilities infrastructure, which will not change the evaluation of Policy HC10 in the SA.

Minor Modification Reference Number	Page / Paragraph	Policy / Section	Proposed Change	Reason for Change	Relevant Representation (if applicable)	Will the proposed modification alter the conclusions of the R19 SA?
mm 019	Pg 97	Policy HC13: Parking Provision	Amend – The Council's recommended parking standards are set out in Appendix H.	Typographical error	Avison Young for Crest Nicholson	No change. The modification corrects a typographical error within the policy.
mm 020	Pg 99	Policy HC14: Health Infrastructure	Amend – Then a proportionate financial contribution or on-site provision will be south and agreed through engagement with the ICS ICB.	Spelling correction	N/A	No change. The modification corrects a typographical error within the policy.
mm 021	Pg 103	Policy HC17: Open Space	Amend – Smaller areas of incidental green infrastructure without a clear recreational purpose	"Smaller area" is not defined – removal adds clarity	Savills for Clowes Developments	The modification removes superfluous text from Policy HC17 that will not change the evaluation of the policy in the SA.
mm 022	Pg 104	Sports Facilities and Playing Pitches	Amend chapter title – Sports Facilities and Playing Pitches Fields	Update terminology	N/A	No change. The modification amends general wording within the Plan.
mm 023	Pg 105, para 9.14	Sports Facilities and Playing Pitches	Amend – The policy also sets out how new residential development will contribute to the provision of new facilities or improvements to existing facilities to ensure there is capacity to cope with demand generated from new residents. The Sports England playing pitch and indoor facilities calculators will be used to inform the level of contributions required.	Adds clarity	Pegasus for Richborough Estates et al	No change. The modification amends general wording within the Plan.
mm 024	Pg 105	Policy HC18: Sports Facilities and Playing Pitches	Amend policy title – Sports Facilities and Playing Pitches Fields	Update terminology	Sport England	No change. The modification alters the title but not the content of Policy HC18.
mm 025	Pg 111	Sustainable Economic Growth	Amend under 'Key Evidence' – Economic Development Needs Assessment – Employment Land Availability Assessment (2021) EDNA Part 2; Economic Land Availability Assessment (2020)	Typographical error	N/A	No change. The modification corrects a typographical error within the Plan.

Minor Modification Reference Number	Page / Paragraph	Policy / Section	Proposed Change	Reason for Change	Relevant Representation (if applicable)	Will the proposed modification alter the conclusions of the R19 SA?
mm 026	Pg 115	Policy EC4: Rural Economy	Amend – 2b) It comprises prioritises the conversion and reuse of rural buildings.	Adds clarity	Emery Planning for Wain Estates	No change. The modification provides clarity on the support for conversion and reuse of rural buildings but will not affect the evaluation of Policy EC4 in the SA.
mm 027	Pg 115	Policy EC4: Rural Economy	Amend clause 2e) – The development is accessible by a choice of means of transport including exploits opportunities to make the sites' location more sustainable including maximising walking, cycling and public transport	Adds clarity and consistency with the NPPF	Emery Planning for Wolverhampton Airport Ltd	No change to conclusions of the Regulation 19 SA; the modification introduces text that will be more likely to encourage uptake of sustainable transport modes associated with rural employment sites, leading to a minor positive effect against SA Objective 10 (transport and accessibility) in the assessment of Policy EC4. This will however not change the overall findings of the Regulation 19 SA in terms of the residual effects identified.
mm 028	Pg 116	Policy EC4: Rural Economy	Amend clause 4b) – There is no adverse impact on amenity or the historic environment.	Adds clarity and retains focus on the historic environment	Historic England	No change. The modification provides clarity on the support for development that will not adversely affect the historic environment, and will not affect the evaluation of Policy EC4 in the SA.
mm 029	Pg 126, para 11.4	Protecting Community Services and Facilities	Amend – Community services and facilities are often the cornerstone of villages and include pubs, shops, post offices, banks and building societies, community buildings and meeting places, sports venues , cultural buildings, places of worship and health facilities	Adds clarity and consistency with the NPPF	Sport England	No change. The modification amends general wording within the Plan.

Minor Modification Reference Number	Page / Paragraph	Policy / Section	Proposed Change	Reason for Change	Relevant Representation (if applicable)	Will the proposed modification alter the conclusions of the R19 SA?
mm 030	Pg 126	Protecting community services and facilities	Amend under 'Key Evidence' – Open Space Assessment and Standards Paper 2019	Typographical error	N/A	No change. The modification corrects a typographical error within the Plan.
mm 031	Pg 131	Policy EC12: Sustainable Transport	Amend clause e) – Adequate provision to mitigate the likely impacts (including cumulative impacts) of their proposal including environmental impacts (such as noise and pollution) and impact on amenity and health. This will be achieved through direct improvements and Section 106 contributions. Where required, appropriate mitigation to address the impacts of any increased traffic (including cumulative impacts) associated with the proposed development shall be provided, either through direct improvements or Section 106 contributions.	Adds clarity and consistency with the NPPF	Pegasus for Richborough Estates et al	No change. The modification re-words the existing policy clause to provide clarity, but will not change the evaluation of Policy EC12 in the SA.
mm 032	Pg 135	Policy NB1: Protecting, Enhancing, and Expanding Natural Assets	Amend – <u>Nationally Designated Sites (SSSI and NNR)</u> Development proposals which directly or indirectly cause significant harm to sites of national importance (whether individually or in combination with other developments) will not be permitted.	Adds clarity and consistency with the NPPF	Avison Young for Crest Nicholson	No change. The modification provides clarity that proposals will be refused when “ <i>significant</i> ” harm to national designations is identified, but continues to support the conservation and enhancement of biodiversity features and mitigation hierarchy. This will not change the evaluation of Policy NB1 in the SA.
mm 033	Pg 137	Policy NB2: Biodiversity	Amend – Development must demonstrate how the mitigation hierarchy has been been applied to the application by first avoiding impacts	Spelling correction	N/A	No change. The modification corrects a typographical error within the policy.

Minor Modification Reference Number	Page / Paragraph	Policy / Section	Proposed Change	Reason for Change	Relevant Representation (if applicable)	Will the proposed modification alter the conclusions of the R19 SA?
mm 034	Pg 138	Policy NB2: Biodiversity	Amend – The built environment should be viewed as an opportunity to fully integrate biodiversity within new development through innovation. Features including green walls and roofs and sustainable urban drainage systems designed for biodiversity will be supported on new developments where appropriate.	Update terminology	N/A	No change. The modification provides a minor update to terminology that will not change the evaluation of Policy NB2 in the SA.
mm 035	Pg 138	Policy NB2: Biodiversity	Amend – All new development must also include measures to assist with halting the decline of species and to address biodiversity loss by including site-specific enhancements for species such as bat and bird boxes, hedgehog highways, planting of native floral species, and the inclusion of features beneficial for invertebrates such as sand banks, bee bricks, retaining dead wood on site, and other beneficial measures. Bat and bird boxes must be integrated into the fabric of buildings wherever possible to ensure the longevity of the enhancements.	Reference to more permanent structures considered necessary	RSPB / Shropshire Swift Group	No change. The modification introduces text that will strengthen the protection and enhancement of biodiversity, but will not change the evaluation of Policy NB2 in the SA where a major positive impact was already identified against SA Objective 3 (biodiversity and geodiversity).
mm 036	Pg 138	Policy NB2: Biodiversity	Amend clause c) – Securing of the habitat in perpetuity. Where it is demonstrated that this is not possible, The habitat must be secured for at least 30 years. This will be achieved via a S106 agreement or planning conditions.	Adds clarity and consistency with national legislation	Avison Young for Crest Nicholson	No change. The modification clarifies the requirements for biodiversity net gain to be maintained for 30 years, in line with national legislation, which will not change the evaluation of Policy NB2 in the SA.

Minor Modification Reference Number	Page / Paragraph	Policy / Section	Proposed Change	Reason for Change	Relevant Representation (if applicable)	Will the proposed modification alter the conclusions of the R19 SA?
mm 037	Pg 139, para 12.13	Cannock Chase SAC	Amend – The main heathland areas of the Cannock Chase Area of Outstanding Natural Beauty (AONB) National Landscape are designed as a Special Area of Conservation (SAC) and are protected under the European Directive 92/43/EEC (The Habitats Directive).	Update terminology	N/A	No change. The modification recognises the rebranding of AONBs as National Landscapes; AONB remains the legal name of the designation.
mm 038	Pg 141, para 12.16	Landscape Character	Amend – Within each of these areas are more localised areas that positively contribute to the district's landscape character, most notably the Cannock Chase Area of Outstanding Natural Beauty (AONB) National Landscape in the north-east and the numerous Historic Landscape Areas and pockets of Ancient Woodland scattered throughout the district.	Update terminology	N/A	No change. The modification recognises the rebranding of AONBs as National Landscapes; AONB remains the legal name of the designation.
mm 039	Pg 141	Policy NB4: Landscape Character	Amend – The intrinsic rural character and local distinctiveness of the South Staffordshire landscape should be maintained protected and where possible enhanced.	Adds clarity and consistency with the NPPF	Avison Young for Crest Nicholson	No change. The modification introduces a minor wording amendment to provide clarity, that will not affect the evaluation of Policy NB4 in the SA.
mm 040	Pg 141	Policy NB4: Landscape Character	Amend – Throughout the district, the design and location of new development should take account of the characteristics and sensitivity of the landscape and its surroundings, and not have a seek to minimise the detrimental effect on the immediate environment and on any important medium and long-distance views.	Adds clarity and consistency with the NPPF	Emery Planning for Wain Estates	No change. The modification introduces a minor wording amendment to provide clarity, that will not affect the evaluation of Policy NB4 in the SA.

Minor Modification Reference Number	Page / Paragraph	Policy / Section	Proposed Change	Reason for Change	Relevant Representation (if applicable)	Will the proposed modification alter the conclusions of the R19 SA?
mm 041	Pg 141	Policy NB4: Landscape Chapter	Amend – Proposals must consider the County Council Landscape Character Assessment and Historic Landscape Characterisation in assessing their impacts upon landscape character and should also (where applicable) have regard to the findings of the latest Landscape Sensitivity Study prepared by the council. Proposals must consider 'Planning for Landscape Change', the Staffordshire County Council Landscape Character Assessment (or any subsequent updates), and Historic Landscape Characterisation, in assessing their impacts upon landscape character. Proposals should (where applicable) have regard to the findings of the latest Landscape Sensitivity Study; South Staffordshire Landscape Sensitivity Assessment 2019, or any subsequent updates.	Document titles updated as per information from SCC	Staffordshire County Council	No change. The modification corrects the titles of various evidence documents relating to landscape to ensure clarity, but does not change any requirements of the policy. This will not change the evaluation of Policy NB4 in the SA.
mm 042	Pg 142	Policy NB4: Landscape Character	Amend – All proposals within the Cannock Chase Area of Outstanding Natural Beauty (AONB) National Landscape and its setting must conserve and enhance the landscape and scenic beauty of the area. In assessing proposals within the AONB National Landscape or its setting regard must be had to the Cannock Chase AONB Design Guide 2020 and Cannock Chase AONB Views and Setting Guide 2020, or subsequent updates of these documents. Proposals that contribute to the objectives of the Cannock Chase AONB Management Plan, the Forst of Mercia and other local initiatives that will contribute to enhancing landscape character will be supported.	Update terminology	Historic England	No change. The modification recognises the rebranding of AONBs as National Landscapes; AONB remains the legal name of the designation.

Minor Modification Reference Number	Page / Paragraph	Policy / Section	Proposed Change	Reason for Change	Relevant Representation (if applicable)	Will the proposed modification alter the conclusions of the R19 SA?
mm 043	Pg 152, para 13.18	Managing Flood Risk, Sustainable Drainage Systems & Water Quality	Amend – Flood risk arises from several sources; River Flooding (fluvial), Surface Water, groundwater, sewers, artificial sources (e.g. canal breaches) , and where ordinary watercourses become overwhelmed. These sources have been examined in the Strategic Flood Risk Assessment (SFRA) which informs this plan. Developers should refer to the SFRA which when preparing proposals and their approach should reflect and take into account its contents	Risk of flooding from artificial sources considered to be a risk and therefore included in the policy	Staffordshire County Council	No change. The modification amends general wording within the Plan.
mm 044	Pg 153	Policy NB7: Managing Flood Risk, Sustainable urban Drainage Systems (SuDS) and Water Quality	Amend policy title – Managing flood risk, Sustainable urban Drainage Systems (SuDS) & water quality	Update terminology	Staffordshire County Council	No change. The modification alters the title but not the content of Policy NB7.
mm 045	Pg 155	Policy NB7: Managing flood risk, Sustainable urban Drainage Systems (SuDS) & water quality	Amend title of clause 2 – Sustainable urban Drainage Systems (SuDS)	Update terminology	N/A	No change. The modification provides a minor update to terminology that will not change the evaluation of Policy NB7 in the SA.
mm 046	Pg 155	Policy NB7: Managing Flood Risk, Sustainable urban Drainage Systems (SuDS) and Water Quality	Amend – Discharge should must not be made into the combined sewer system.	Adds clarity	Kinver Parish Council	No change. The modification introduces text that will strengthen sustainable drainage and sewerage requirements, but will not change the evaluation of Policy NB7 in the SA where a minor positive impact was already identified against SA Objective 5 (pollution and waste).

Minor Modification Reference Number	Page / Paragraph	Policy / Section	Proposed Change	Reason for Change	Relevant Representation (if applicable)	Will the proposed modification alter the conclusions of the R19 SA?
mm 047	Pg 157	Policy NB8: Protection and enhancement of the historic environment and heritage assets	Amend – The historic environment will be conserved and enhanced, and heritage assets will be protected in a manner appropriate to their significance. Development proposals should demonstrate how they conserve or enhance the character, appearance and function of heritage assets and their settings and respect the significance of heritage assets, including their setting, character, appearance and function the historic environment.	Adds clarity	Historic England	No change. The modification introduces text that will strengthen the conservation and enhancement of heritage assets, but will not change the evaluation of Policy NB8 in the SA where a major positive impact was already identified against SA Objective 9 (cultural heritage).
mm 048	Pg 158	Policy NB8: Protection and enhancement of the historic environment and heritage assets	Amend – Development proposals should seek to avoid, and then or minimise harm to heritage assets in the first instance.	Adds clarity and consistency with the NPPF	Emery Planning for Wain Estates	No change. The modification introduces a minor wording amendment to provide clarity, that will not affect the evaluation of Policy NB8 in the SA.
mm 049	Pg 158	Policy NB8: Protection and enhancement of the historic environment and heritage assets	Amend – Development proposals which would cause harm to, or loss of , the significance of a heritage asset, or its setting, will not be permitted without a clear justification in accordance with legislation and national policy.	Adds clarity and consistency with the NPPF	Avison Young for Crest Nicholson	No change. The modification introduces text that will strengthen the protection of heritage assets, but will not change the evaluation of Policy NB8 in the SA where a major positive impact was already identified against SA Objective 9 (cultural heritage).
mm 050	Pg 158	Policy NB8: Protection and enhancement of the historic environment and heritage assets	Amend – The council will support measures which secure the improved maintenance, management and sustainable and appropriate reuse of heritage assets (where appropriate), particularly those which are identified nationally or locally as being at risk.	Typographical error – adds clarity	Historic England	No change. The modification corrects a typographical error within the policy.

Minor Modification Reference Number	Page / Paragraph	Policy / Section	Proposed Change	Reason for Change	Relevant Representation (if applicable)	Will the proposed modification alter the conclusions of the R19 SA?
mm 051	Pg 158	Protection and enhancement of the historic environment and heritage assets	Amend 'Key Evidence' – <ul style="list-style-type: none"> • Conservation Area Appraisals and Management Plans 2010 • Buildings of Special Local Interest • Historic Environment Site Assessment 2022 • Historic Environment Site Assessment Update 2023 • Historic Environment Character Assessment 2011 • West Midlands Farmsteads and Landscape Project 2010 • Staffordshire Extensive Urban Survey • Cannock Chase AONB Historic Environment Assessment 	Additional evidence considered necessary to include	Staffordshire County Council	No change. The modification lists additional evidence base documents previously omitted.
mm 052	Pg 164	Appendix A: Key evidence base and topic papers	Add under 'Environmental / Sustainability' - <ul style="list-style-type: none"> • Planning Evidence Base Review Stage 1 (2017) • Planning Evidence Base Review Stage 2 (2021) • Cannock Chase SAC Partnership MOU and Financial Agreement (2022) • West Midlands Farmsteads and Landscape Project 2010 Planning for Landscape Change – Staffordshire County Council 	Additional evidence considered necessary to include	N/A	No change. The modification lists additional evidence base documents previously omitted.

Minor Modification Reference Number	Page / Paragraph	Policy / Section	Proposed Change	Reason for Change	Relevant Representation (if applicable)	Will the proposed modification alter the conclusions of the R19 SA?
mm 053	Pg 164	Appendix A: Key evidence base and topic papers	Add under 'Historic Environment' - <ul style="list-style-type: none"> • Historic Environment Character Assessment (2011) • Historic Environment Record (HER) • Historic Landscape Characterisation (HLC) • Hatherton Canal Restoration Feasibility Report 2006 • Hatherton Canal Restoration Supplementary Feasibility Report 2009 	Additional evidence considered necessary to include	N/A	No change. The modification lists additional evidence base documents previously omitted.
mm 054	Pg 164	Appendix A: Key evidence base and topic papers	Delete under 'Infrastructure' – Local Plan Viability Study (update report) (2024)	The study was not progressed	N/A	No change. The modification removes reference to a defunct evidence document that will not affect the SA.
mm 055	Pg 164	Appendix A: Key evidence base and topic papers	Amend under 'Infrastructure' – South Staffordshire Integrated Transport Strategy (2024) (2017)	Typographical error	N/A	No change. The modification corrects a typographical error within the Plan.
mm 056	Pg 164	Appendix A: Key evidence base and topic papers	Add under 'Infrastructure' – <ul style="list-style-type: none"> • Local Transport Plan 	Additional evidence considered necessary to include	Staffordshire County Council	No change. The modification lists additional evidence base documents previously omitted.
mm 057	Pg 164	Appendix A: Key evidence base and topic papers	Add under 'Infrastructure' <ul style="list-style-type: none"> • West Midlands Combined Authority New Stations Assessment Update and Recommendations (2024) 	New evidence undertaken since previous draft	N/A	No change. The modification lists a new evidence document of relevance to the Plan area but does not directly change the content of the Plan or the accompanying SA.

Minor Modification Reference Number	Page / Paragraph	Policy / Section	Proposed Change	Reason for Change	Relevant Representation (if applicable)	Will the proposed modification alter the conclusions of the R19 SA?
mm 058	Pg 178	Appendix C: Housing allocation maps and proformas (Site 523)	Add to 'Key Requirements' as third bullet point – Any historic environment mitigation for the site, as identified in the Council's Historic Environment Site Assessment (2022), including any mitigation required as a result of archaeological investigations.	Omission from Regulation 19 version of the plan	Historic England	No change. The modification provides an amendment to a site proforma that forms supplementary information for the LPR policies, but does not affect any policy content.
mm 059	Pg 188	Appendix C: Housing allocation maps and proformas (Site 730)	Amend – Village: Great Wyrley Cheslyn Hay	Typographical error	N/A	No change. The modification corrects a typographical error within the Plan.
mm 060	Pg 190	Appendix C: Housing allocation maps and proformas (Site 536a)	Amend – Any historic environment mitigation for the site to conserve the setting of heritage assets and historic character as identified in the council's Historic Environment Site Assessment Stage 2 (2022), including retention and enhancement of tree and hedgerow boundaries bordering the site and any mitigation required as a result of archaeological investigations.	Amended to ensure the information is readily available at planning application stage	Historic England	No change. The modification provides an amendment to a site proforma that forms supplementary information for the LPR policies, but does not affect any policy content.
mm 061	Pg 210	Appendix C: Housing allocation maps and proformas (Site 239)	Amend – Provide vehicular and pedestrian access via Wrottesley Park Road into neighbouring allocated site to the south.	Updated as per recent discussions with landowner / developer	N/A	No change. The modification provides an amendment to specific site access arrangements that are beyond the scope of the SA.
mm 062	Pg 214	Appendix C: Housing allocation maps and proformas (Site 285)	Amend the first bullet point – Provide highway and pedestrian connectivity to site 459	As requested by owners / developers of the site in line with current planning application	Pegasus for Taylor Wimpey	No change. The modification provides an amendment to specific site access arrangements that are beyond the scope of the SA.

Minor Modification Reference Number	Page / Paragraph	Policy / Section	Proposed Change	Reason for Change	Relevant Representation (if applicable)	Will the proposed modification alter the conclusions of the R19 SA?
mm 063	Pg 218	Appendix C: Housing allocation maps and proformas (Site 459)	Amend - Minimum capacity: 97 65 dwellings	Capacity reduced due to the presence of electricity pylons and associated easements	Evolve for Lovell Homes	No change. The modification provides an amendment to a site proforma that forms supplementary information for the LPR policies, but does not affect any policy content. The proposed change relates to a slight reduction in the minimum capacity of Site 459 that has been evaluated in the SA as a reasonable alternative site (see also mm 010). This will not affect the evaluation of the site, or of Policy SA3 which allocates housing sites, in the SA.
mm 064	Pg 218	Appendix C: Housing allocation maps and proformas (Site 459)	Amend the first bullet point – Provide highway and pedestrian connectivity to site 285	As requested by owners / developers of the site in line with current planning application	Pegasus for Taylor Wimpey	No change. The modification provides an amendment to a site proforma that forms supplementary information for the LPR policies, but does not affect any policy content.
mm 065	Pg 218	Appendix C: Housing allocation maps and proformas (Site 459)	Add to 'Key Requirements' as fourth bullet point – The presence of high voltage overhead lines across the site will need to be retained and incorporated into any development.	Reference to the presence of the overhead lines and the need for careful design to safeguard its route required	Lucy White Planning for National Grid	No change. The modification provides an amendment to a site proforma that forms supplementary information for the LPR policies, but does not affect any policy content.

Minor Modification Reference Number	Page / Paragraph	Policy / Section	Proposed Change	Reason for Change	Relevant Representation (if applicable)	Will the proposed modification alter the conclusions of the R19 SA?
mm 066	Pg 227	Appendix C: Housing allocation maps and proformas (Site 251)	Amend – Minimum capacity: 47 15 dwellings	Capacity and site area amended in line with landowners / developers detailed information	PlanIT for Hampton Oak Developments	No change. The modification provides an amendment to a site proforma that forms supplementary information for the LPR policies, but does not affect any policy content. The proposed change relates to a slight reduction in the minimum capacity of Site 251 that has been evaluated in the SA as a reasonable alternative site (see also mm 011 and mm 067). This will not affect the evaluation of the site, or of Policy SA3 which allocates housing sites, in the SA.
mm 067	Pg 227	Appendix C: Housing allocation maps and proformas (Site 251)	Amend – Site area: 0.8ha 0.7ha	Capacity and site area amended in line with landowners / developers detailed information	PlanIT for Hampton Oak Developments	No change. The modification provides an amendment to a site proforma that forms supplementary information for the LPR policies, but does not affect any policy content. The proposed change relates to a slight reduction in the developable area of Site 251 that has been evaluated in the SA as a reasonable alternative site (see also mm 011 and mm 066). This will not affect the evaluation of the site, or of Policy SA3 which allocates housing sites, in the SA.

Minor Modification Reference Number	Page / Paragraph	Policy / Section	Proposed Change	Reason for Change	Relevant Representation (if applicable)	Will the proposed modification alter the conclusions of the R19 SA?
mm 068	Pg 248	Appendix E: Employment allocation maps and proformas (site E30)	Add a 'Key Requirements' section to include – Any historic environment mitigation for the site, as identified in the council's Historic Environment Site Assessment Update (2023), including any mitigation required as a result of archaeological investigations.	Three Grade II listed buildings adjacent to the site and the potential for non-designated heritage assets to be impacted by the development	Historic England	No change. The modification provides an amendment to a site proforma that forms supplementary information for the LPR policies, but does not affect any policy content.
mm 069	Pg 250	Appendix E: Employment allocation maps and proformas (site E44)	Add a 'Key Requirements' section to include – Any historic environment mitigation for the site, as identified in the council's Historic Environment Site Assessment Stage 2 (2022), including any mitigation required as a result of archaeological investigations.	Medium potential for archaeological remains to be found on site and therefore a mitigation measure should be included	Historic England	No change. The modification provides an amendment to a site proforma that forms supplementary information for the LPR policies, but does not affect any policy content.
mm 070	Pg 259	Appendix H: Parking Standards	Amend – As part of achieving these aims it is vitally important that the local plan facilitates facilitates a rapid transition to electric vehicle within the plan period.	Spelling correction	N/A	No change. The modification corrects a typographical error within the Plan.
mm 071	Pg 265	Appendix J: Glossary	Amend – Area of Outstanding Natural Beauty (AONB) National Landscape – An area with statutory national landscape designation, the primary purpose of which is to conserve and enhance natural beauty.	Update terminology	N/A	No change. The modification recognises the rebranding of AONBs as National Landscapes; AONB remains the legal name of the designation.
mm 072	Throughout	Throughout	Numerous minor typographical errors regarding upper and lower case on policy / chapter / headings	Typographical error	N/A	No change. The modification corrects formatting and typographical errors within the Plan.

Minor Modification Reference Number	Page / Paragraph	Policy / Section	Proposed Change	Reason for Change	Relevant Representation (if applicable)	Will the proposed modification alter the conclusions of the R19 SA?
mm 73	Policies map	Policies map	Addition of existing permanent gypsy and traveller sites to the policies map that were omitted in error (note: these site are not proposed for allocation, but are identified on the policies map to identify the location of other established sites). Sites added to the policies map are those referenced GT02, GT03, GT04, GT09, GT10, GT11, GT13, GT15, GT16, GT19, GT20, GT30, GT33, GT34, GT38, GT40, GT43, TS01.	Cartographical error	N/A	No change. The modification provides visual context for the policy map by listing existing gypsy and traveller sites that were previously omitted.

5 Conclusions and next steps

5.1 Conclusion

- 5.1.1 The proposed minor modifications to the South Staffordshire LPR as proposed by SSDC have been screened in **Chapter 4** of this report to determine whether the proposed modifications are likely to lead to changes in the sustainability performance of the related part of the plan.
- 5.1.2 SSDC have proposed a total of 73 minor modifications to the content of the Local Plan to form the Submission Version of the LPR that will be submitted to the Secretary of State for independent examination.
- 5.1.3 The majority of these minor modifications relate to changes to supporting text and contextual information within the Plan, correcting typographical errors and omitted information; these changes will not have any effect on the SA. There have also been minor changes to the wording and content of LPR policies compared to the versions that have been assessed in the Regulation 19 SA. The appraisal has identified that the majority of these modified policies are unlikely to result in any significant effects.
- 5.1.4 One proposed modification (see **mm 027** in **Table 4.1**) has been identified to change the assessment of the policy in the SA process: Policy EC4 'Rural Economy', whereby the modification introduces text that will be more likely to encourage uptake of sustainable transport modes associated with rural employment sites, leading to a minor positive effect against SA Objective 10 (transport and accessibility). This will however not change the overall findings of the Regulation 19 SA in terms of the residual effects identified.
- 5.1.5 None of the proposed minor modifications have been identified to alter the overall residual effects of the South Staffordshire Local Plan as identified in the Regulation 19 SA Report (2024).

5.2 Next steps

- 5.2.1 Following the Regulation 19 'Publication Plan' consultation that was held for 6 weeks between 18th April and 31st May 2024, the next stage of the LPR process is submission of the Plan to the Secretary of State who will appoint an independent Planning Inspector to carry out the formal examination of the Plan.
- 5.2.2 This SA Addendum will be submitted alongside the Submission Version of the LPR.
- 5.2.3 Further information regarding the submission and examination process can be found on the LPR website: <https://www.sstaffs.gov.uk/planning/planning-policy/local-plan-review>

Habitats Regulations Assessments

Sustainability Appraisals

Strategic Environmental Assessments

Landscape Character Assessments

Landscape and Visual Impact Assessments

Green Belt Reviews

Expert Witness

Ecological Impact Assessments

Habitat and Ecology Surveys



LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

© Lepus Consulting Ltd

Eagle Tower

Montpellier Drive

Cheltenham

GL50 1TA

T: 01242 525222

E: enquiries@lepusconsulting.com

www.lepusconsulting.com

CHELtenham



Lepus Consulting
Eagle Tower,
Montpellier Drive,
Cheltenham
Gloucestershire GL50 1TA

t: 01242 525222
w: www.lepusconsulting.com
e: enquiries@lepusconsulting.com