

Date: 22 December 2021
Our ref: 371890
Your ref: South Staffordshire Local Plan Review Preferred Options Consultation



Planning Policy Team,
South Staffordshire Council

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BY EMAIL ONLY

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Dear Sir/Madam

Subject: South Staffordshire Local Plan Review Preferred Options Consultation

Thank you for your consultation dated and received by Natural England on 21 October 2021.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

South Staffordshire Local Plan Review Preferred Options document

Question 1:

Do you agree that the evidence base set out in Appendix A is appropriate to inform the new Local Plan?

No.

Please provide comments on the content or use of the evidence base set out in Appendix A, referencing the document you are referring to.

Natural England would advise that the evidence base is not complete and we refer you to Annex A below for advice on sources of local plan evidence on the natural environment.

Question 2:

(a) Do you agree that the correct infrastructure to be delivered alongside proposed site allocations been identified in the IDP?

Please see below.

(b) Is there any other infrastructure not covered in this consultation document or the IDP that the Local Plan should seek to deliver?

Yes. The Nature Recovery Network. The local plan evidence base includes the [South Staffordshire District Nature Recovery Network Mapping](#) but the IDP does not reflect this evidence. The IDP should include the [nature recovery network](#) and in line with the [25 Year Environment Plan](#) take into account opportunities for nature recovery identified in the South Staffordshire District Nature Recovery Network Mapping.

Question 3:

a) Have the correct vision and strategic objectives been identified?

Natural England advises that the Plan's vision and emerging development strategy should address

impacts on and opportunities for the natural environment and set out the environmental ambition for the plan area. The plan should take a strategic approach to the protection and enhancement of the natural environment, including providing a net gain for biodiversity, considering opportunities to enhance and improve connectivity. Where relevant there should be linkages with the Biodiversity Action Plan, Local Nature Partnership, Nature Recovery Network, Rights of Way Improvement Plans and Green Infrastructure Strategies.

b) Do you agree that the draft policies (Chapters 4 and 5) and the policy directions (Chapter 6) will deliver these objectives? Yes/No

Please see our comments below in relation to the relevant chapters.

Question 4:

Do you support the policy approach in Policy DS1 – Green Belt and Policy DS2 – Open Countryside? Yes/No

If no, please explain how these policies should be amended?

In relation to the aspects of the Policy DS1-Green Belt which are within Natural England's remit, we support the recognition of opportunities to enhance the beneficial use of the green belt. The green belt has the potential to deliver more positive benefits for the natural environment and people's enjoyment of it and to play a role in climate change adaptation. Opportunities should be taken to link into green infrastructure and ecological networks, both within the urban areas and with the open countryside.

Policy DS2 – Open Countryside. We have no comments to make about this policy.

Question 5:

Do you support the policy approach in Policy DS3 – The Spatial Strategy to 2038? Yes/No

If no, please explain how this policy should be amended?

We have no comments to make.

Question 6:

Do you support the policy approach in and Policy DS4 – Longer Term Growth Aspirations for a New Settlement? Yes/No

If no, please explain how this policy should be amended?

Any new proposed settlement would need to be located where it would not impact on designated sites. We welcome the green infrastructure and health section and the future proofed section. We would advise that you think about water quality, air quality and minimising impacts on soil and in line with paragraph 174e) of the [National Planning Policy Framework](#) look to "improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; ".The new settlement should be designed to minimise any environmental impacts including climate change emissions as well as contributing to the environment and ecological networks. Within the settlement there should be green /natural space equality. See the following for further information: [Green Space, equality, and fairness](#). We advise referring to Natural England's work on [Accessible Natural Greenspace Standard \(ANGSt\)](#) and [Accessible Natural Green Space Standards in Towns and Cities: A Review and Toolkit for their Implementation](#).

You may find it helpful to look at the [Eco-towns advice worksheets](#) which provide information on good practice in new development in terms of sustainable development.

Question 7:

a) Do you support the proposed strategic housing allocations in policies SA1-SA4? Yes/No

If no, please explain your reasons for this.

We provide the following advice on the proposed allocations:

- Strategic housing allocations in policies SA1-SA4 are within 15km of Cannock Chase SAC and will therefore have potential recreational impacts on Cannock Chase SAC.
- The allocations have the potential to have air quality impacts on designated sites and this should be assessed further to understand the impacts.
- We note that all the sites are within agricultural land classification (ALC) 2 and 3 as identified by the Agricultural Land Classification - Provisional (England) mapping available from Natural England. Best and most versatile land is considered to be ALC 1,2 and 3a. Best and most versatile land and soil generally should be safeguarded in line with paragraph 174 a) and b) of the [National Planning Policy Framework](#) or the government's [25 Year Environment Plan](#). See also relevant section in Additional comments/advice.
- The allocations should contribute to the nature recovery network.

b) Do you agree that given the scale of the 4 sites detailed in policies SA1-SA4, these warrant their own policy to set the vision for the site, alongside a requirement for a detailed masterplan and design code?

Yes.

Question 8:

Do you support the proposed housing allocations in Policy SA5? Yes/No

Please reference the site reference number (e.g site 582) for the site you are commenting on in your response.

We provide the following advice on the proposed allocations:

- *Cannock Chase SAC and recreational impacts.* Any sites within 15km of Cannock Chase SAC will have potential recreational impacts on Cannock Chase SAC.
- *Air quality impacts.* They are also potential air quality impacts on designated sites from the proposed allocations. A traffic assessment will be required to understand what the potential impacts of the allocations will be. See also our advice under Habitats Regulation Assessment.
- *Soils (Including best and most versatile land - BMV).* We note the high proportion proposed allocations taking place on greenfield land and the lack of comprehensive information on the where the best and most versatile land (ALC grades 1-3a) is within the district.

You may want to check the following links to establish whether they offer additional information you were not previously aware of:

The 1:250 000 ALC dataset can be downloaded from the Natural England website http://www.gis.naturalengland.org.uk/pubs/gis/GIS_register.asp (there is also a link from the Magic website) .

The post 1988 ALC data layer (which shows a subdivision of Grade 3) can also be made available, by contacting Naturalenglandqdatamanagers@naturalengland.org.uk .

Both these data sets are also available to download from <http://www.geostore.com/environment-agency/> .

See also section relevant section in Additional comments/advice.

Tier 1 Settlements

Site 119a Land adjoining Saredon Road

Site 136 Land at Landywood Lane

Site 704 Land off Norton Lane

- Hydrologically connection to Stowe Pool and Walk Mill Clay Pit SSSI

Site 136 Land at Landywood Lane

- Likely hydrologically connection to Stowe Pool and Walk Mill Clay Pit SSSI due to proximity of water course.

Site 154a Walsall Road

- This site is a brownfield site. Brownfield sites can have a high biodiversity value. Has the biodiversity value of the site been assessed?

[National Planning Policy Framework](#) paragraph 120b):

120. Planning policies and decisions should:

b) recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production;

Tier 2 Settlements

Site 591 Land at Oaklands Farm (north of Limepit Lane)

- Site adjacent to Cannock Chase AONB and could have significant impacts. We advise referring to [Cannock Chase AONB views and setting guide](#) and consultation with the AONB Partnership.

Site 016 Land at Pear Tree Farm

- Within close proximity to Cannock Chase AONB and could have significant impacts.. We advise referring to [Cannock Chase AONB views and setting guide](#) and consultation with the AONB Partnership.

Wombourne sites all (416, 285, 562/415, 459, 463, 284, 286) are in close proximity to the two Local Nature Reserves, South Staffordshire Railway Walk and Wom Brook Walk, which cross Wombourne

Tier 3 Settlements

Wheaton Aston site allocations: Site 379 Land off Ivetsey Road, Site 426a Bridge Farm: 54 Long Street and Site 610 Land off Marston Road/ Fenton House Lane

These site allocations are in close proximity to [Motte Meadows SAC](#), [Motte Meadows SSSI](#) and Motte Meadows National Nature Reserve. Motte Meadows is one of the best examples in the UK of wildflower rich floodplain meadows. The site is made up of a series of alluvial flood meadows which have been managed as hay meadows for many centuries.

We have a number of concerns about the site allocations which we note that water quality and recreational impacts have been identified in the Habitats Regulation Assessment (HRA):

- [Water quality impacts.](#) Water pollution from surface water drainage and foul drainage (including combined sewer overflow if applicable), especially Site 610 Land off Marston Road/ Fenton House Lane.
- [Air quality impacts.](#) We note that Marston Road borders the top half of the SAC and traffic increases on this road could have an impact. We note that for ammonia the site is in exceedance and for nitrogen deposition the site is currently exceeding and close to exceeding the upper threshold (Source: [APIS](#)).
- [Recreation impacts.](#) The proposed site allocations are likely to increase recreational pressure on the site. Alternative green and open space will need to be included as part of any mitigation measures.

Please note that the SAC has a maintain and restore objective for water quality and quality, air quality.

Other Sites Adjacent Neighbouring Towns and Cities

036c Land at Weeping Cross (adjoining Stafford Borough)

- Potential significant impacts on Cannock Chase AONB due to location and size. We advise referring to [Cannock Chase AONB views and setting guide](#) and consultation with the AONB Partnership.

Question 9:

A) Do you support the proposed pitch allocations in Policy SA6? Yes/No

Please reference the site reference number (e.g GT01) for the site you are commenting on in your response.

We provide the following advice on the proposed allocations:

- Any sites within 15km of Cannock Chase SAC and will have potential recreational impacts on Cannock Chase SAC.
- They are also potential air quality impacts on designated sites from the proposed allocations. A traffic assessment will be required to understand what the potential impacts of the allocations will be.

Site GT32 Pool House Road, Wombourne

- Hydrologically connection to Stowe Pool and Walk Mill Clay Pit SSSI

Site GT35 122 Streets Lane, Great Wyrley

- Likely hydrologically connection to Stowe Pool and Walk Mill Clay Pit SSSI due to proximity of water course.

B) Is there another option for meeting our gypsy and traveller needs, including any alternative site suggestions that could be considered? Yes/No

Please provide details, including a plan for new site suggestions

We have no comments to make.

Question 10:

Do you support the proposed allocation in Policy SA7? Yes/No

- They are potential air quality impacts on designated sites from the proposed allocation.
- In close proximity to Four Ashes Pit SSSI and could have significant impacts.
- Loss of priority habitat- deciduous woodland.

Question 11:

Do you agree with the proposed policy approaches set out in Chapter 6? Yes/No

If no, then please provide details setting out what changes are needed, referencing the Policy Reference number (e.g HC1 - Housing Mix).

We provide the following advice on the proposed policy approaches:

HC13 - Health and Wellbeing

There is evidence to demonstrate the positive impact that the natural environment can have on health (see links below) and we would advise making reference to this in this policy. See links below for further information. Natural England is one of the partners involved in a project to test how to increase use and connectivity to [green social prescribing](#) in England to improve people's mental health.

[Improving health in cities using green infrastructure- a review](#)

[Links between natural environments and obesity](#)

[Links between natural environments and physical activity](#)

[Links between natural environments and physiological health](#)
[Links between natural environments and mental health](#)
[Good practice in social prescribing for mental health: the role of nature-based interventions \(NECR228\)](#)
[Cities, green infrastructure and health](#)
[NECR211 – Is it nice outside? – Consulting people living with dementia and their carers about engaging with the natural environment](#)
[Connection to Nature](#)
[POSTNOTE- Green space and health](#)

HC17 - Open Space

We welcome this policy direction, specifically the links to the green infrastructure. There is an opportunity to enhance and create green and blue infrastructure throughout the South Staffordshire area and to link in with geology and heritage assets, while providing climate change adaptation and mitigation and improving ecological connectivity. When considering opportunities we would advise thinking about whether any existing designated sites or local wildlife sites are being affected by for example recreational impacts or water quality impacts and whether they are opportunities to mitigate these impacts through the creation and enhancement of green and blue infrastructure and open spaces. You may also wish to consider as part of your strategy the implications of the Covid pandemic and how the need for access to nature nearby has increased.

Natural England developed the [Accessible Natural Greenspace Standard \(ANGST\)](#), which recommends that everyone, wherever they live, should have accessible natural greenspace of at least two hectares in size, no more than 300 metres (five minutes' walk) from home. Natural England is working with Defra to revise these standards and develop Green Infrastructure Standards that will feed into this piece of evidence. The following document is part of this development and you may find it useful: [A rapid scoping review of health and wellbeing evidence for the Framework of Green Infrastructure Standards](#).

HC19 - Wider green infrastructure design principles

We support the inclusion of this policy. The development plan should set out a clear strategy for how green infrastructure will be delivered. This could include green infrastructure targets, standards, requirements for development and opportunity areas. The strategy may be based on current green infrastructure strategies, upcoming green infrastructure strategies, other natural environment strategies or biodiversity opportunity/ecological network mapping. The plan should identify deficiencies in green infrastructure provision and opportunities for new green infrastructure. The green infrastructure policy should support and align with other natural environment and active travel policies (e.g., biodiversity net gain investment can support wider green infrastructure outcomes). We refer you to [Planning Policy Guidance -Green Infrastructure](#).

We are currently working on the green infrastructure standards. If you would like further information, please contact us. We are also aware of [Building with Nature](#), which provides a benchmark for the design and maintenance of green infrastructure in housing and commercial development.

You may find the following links useful:

[Natural England's Green Infrastructure Guidance](#)
[Green Infrastructure Strategies: an introduction for local authorities and their partners](#)
[Econets, landscape & people: Integrating people's values and cultural ecosystem services into the design of ecological networks and other landscape change proposals \(NECR180\)](#)
[Climate Change Adaptation Manual](#)
[EEA Technical report No 12 2015- Exploring nature-based solutions. The role of green infrastructure in mitigating the impacts of weather- and climate change-related natural hazards](#)
[NECR175 - Research on the assessment of risks & opportunities for species in England as a result of climate change](#)

In urban areas there will be opportunities to: retrofit Sustainable Urban Drainage (SUDS) which can help with water management, plant trees which can provide shading and cooling -an important climate change adaptation and design in green and blue infrastructure into redevelopment. For information on opportunities, please see below:

[Greening the Grey: a framework for integrated green grey infrastructure](#)
[Designing Blue Green Infrastructure \(BGI\) for water management, human health, and wellbeing: summary of evidence and principles for design](#)
[Introducing England's urban forests](#)
[Forest Research- Urban Tree Manual](#)
[The Trees and Design Action Group \(TDAG\) Guides](#)

We are aware of the following tools which may be of interest to you:

Exeter Uni- ORVal: Outdoor Recreation Valuation Tool <http://Leep.exeter.ac.uk/orval/>

University of Liverpool – Condatis: A decision support tool to identify the best locations for habitat creation and restoration to enhance existing habitat networks and increase connectivity across landscapes.. <http://wordpress.condatis.org.uk/>

EC1 - Sustainable economic growth

We welcome the inclusion of creation and enhancement of multifunctional green spaces and enhancement of the green infrastructure network.

EC8 – Wolverhampton Halfpenny Green Airport

The Habitats Regulation Assessment has noted that this policy could lead to growth at the site and potential likely significant effects in combination for air quality impacts.

EC11 -Sustainable transport

The Habitats Regulation Assessment has identified that air pollution, in particular from traffic, could impact International and European designated sites. Due to a lack of evidence impacts have not been assessed and cannot be ruled out. Once evidence is provided and an assessment is made, changes may be required as the approach to dealing with air quality impacts on European designated sites is progressed.

NB1 - Protecting, enhancing and expanding natural assets

We support the policy direction. We advise that you ensure that you include European designated sites (ie. Special Area of Conservation (SAC) and Special Protection Area (SPA)) and make reference to green and blue infrastructure.

We would advise including within the policy the hierarchy of designated sites in line with paragraph 175 of the [National Planning Policy Framework](#) and ensuring any references made to designated sites reflects this hierarchy.

NB2 - Biodiversity

We support this policy and advise the following:

The plan's approach to biodiversity net gain should be compliant with the mitigation hierarchy, as outlined in paragraph 175 of the [National Planning Policy Framework](#). The policy should ensure that biodiversity net gain is not applied to irreplaceable habitats and should also make clear that any mitigation and/or compensation requirements for European sites should be dealt with separately from

biodiversity net gain provision.

Policies and decisions should first consider options to avoid adverse impacts on biodiversity from occurring. When avoidance is not possible impacts should be mitigated and finally, if there is no alternative, compensation provided for any remaining impacts. Biodiversity net gain should be additional to any habitat creation required to mitigate or compensate for impacts. It is also important to note that net gains can be delivered even if there are no losses through development.

The policy for net gain, or its supporting text, should highlight how losses and gains will be measured. [The Biodiversity Metric 3.0](#) can be used for this purpose as a fully tested metric that will ensure consistency across the plan-area and we would encourage its use. Alternatively your authority may choose to develop a bespoke metric, provided this is evidenced based.

The following may also be useful considerations in developing plan policies:

- Use of a map within the plan. Mapping biodiversity assets and opportunity areas ensures compliance with national planning policy and also helps to clearly demonstrate the relationship between development sites and opportunities for biodiversity net gain.
- Use of a biodiversity net gain target. Any target should be achievable and evidence based and may be best placed in lower tier documents or a Supplementary Planning Document, to allow for regular updates in line with policy and legislation.
- Consideration should be given to thresholds for different development types, locations or scales of development proposals and the justification for this. Setting out the scope and scale of expected biodiversity net gains within Infrastructure Delivery Plans can help net gain to be factored into viability appraisals and land values. Natural England considers that all development, even small scale proposals, can make a contribution to biodiversity. Your authority may wish to refer to Technical Note 2 of the [CIEEM guide](#) which provide useful advice on how to incorporate biodiversity net gain into small scale developments.
- Policy should set out how biodiversity net gain will be delivered and managed and the priorities for habitat creation or enhancement in different parts of the plan area. The plan policy should set out the approach to onsite and offsite delivery. Natural England advises that on-site provision should be preferred as it helps to provide gains close to where a loss may have taken place. Off-site contributions may, however, be required due to limitations on-site or where this best meets wider biodiversity objectives set in the development plan. Further detail could be set out in a supplementary planning document.
- The policy could also usefully link to any complementary strategies or objectives in the plan, such as green infrastructure.

Monitoring

Your plan should include requirements to monitor biodiversity net gain. This should include indicators to demonstrate the amount and type of gain provided through development. The indicators should be as specific as possible to help build an evidence base to take forward for future reviews of the plan, for example the total number and type of biodiversity units created, the number of developments achieving biodiversity net gains and a record of on-site and off-site contributions.

Local Planning Authorities should work with local partners, including the Local Environmental Record Centre and wildlife trusts, to share data and consider requirements for long term habitat monitoring. Monitoring requirements should be clear on what is expected from landowners who may be delivering biodiversity net gains on behalf of developers. This will be particularly important for strategic housing allocations and providing as much up front information on monitoring will help to streamline the project stage.

NB3 - Cannock Chase SAC

We support the policy direction but advise that as noted in the Habitats Regulation Assessment, any mitigation must be fully secured.

In terms of including a policy hook additionally for air quality for Cannock Chase SAC and other International and European sites, we would suggest that you may wish to have this as a separate policy.

NB4 - Landscape Character

We would advise that reference should be made to Cannock Chase Area of Outstanding Natural Beauty (AONB), which is within the South Staffordshire local plan area, and to conserving and enhancing of its character. We suggest that you also make reference to the [Cannock Chase AONB Design Guide](#) and the [Cannock Chase AONB Management Plan](#).

Natural England would like to see the policy requiring new developments to minimise and mitigate the visual impacts that it has on the Character Areas and quality of its landscape setting. We would like to see visual impacts include light pollution and for noise pollution also to be included. Local Landscape Character Assessments will be essential here alongside the National Character Area Assessments as a source of evidence.(See Annex A)

Light pollution has negative impacts on local amenity, intrinsically dark landscapes and nature conservation (especially bats and invertebrates). Light pollution mapping is available from [CPRE](#).

The Local Plan should identify relevant areas of tranquillity and provide appropriate policy protection to such areas as identified in paragraph 102 and 185 of the [National Planning Policy Framework](#). Tranquillity is an important landscape attribute in certain areas. The CPRE have mapped areas of tranquillity which are available [here](#) and are a helpful source of evidence for the Local Plan and SEA/SA.

NB5 - Renewable and low carbon energy generation and NB6 - Energy and water efficiency, energy and heat hierarchies and renewable energy in new development

We support the direction but advise that the Local Plan should consider climate change adaption and mitigation, as well as recognising the role of the natural environment to deliver measures to reduce the effects of climate change, for example tree planting to moderate heat island effects. In addition factors which may lead to exacerbate climate change (through more greenhouse gases- not just carbon) should be avoided (e.g. pollution, habitat fragmentation, loss of biodiversity) and the natural environment's resilience to change should be protected. Green Infrastructure and resilient ecological networks play an important role in aiding climate change adaptation. 'Nature-based solutions', are essential to achieve this. These involve the restoration of ecosystems for the long-term benefit of people and nature. Examples include:

- Expansion of tree and woodland cover - to strengthen woodland habitat networks, protect soils, provide shade whilst capturing additional carbon from the atmosphere.
- Restoration and creation of [priority habitats](#) such as lowland heathland, lowland meadows, lowland fens and rush pastures. This improves places where people live and recreate, protecting carbon stores and strengthening the nature recovery network.
- Natural floodplain management, through the use of tree planting, habitat creation and restoration, to alleviate flooding further downstream.
- Retrofitting of green and blue infrastructure such as trees and sustainable urban drainage systems (SUDS) in urban localities to address flood risk and heat island effects.

Within your Plan we suggest you consider including the following actions:

1. Set an ambitious climate-specific policy with targets for reducing greenhouse gas emissions. Plans should include a clear commitment to achieving the national statutory target of net zero

- emissions by 2050, with policies to secure significant reductions in greenhouse gas emissions over the Plan period;
2. Identify, protect and plan to restore all areas of peatland. Our mapping system shows that there are areas of peat in the Plan area south of Stafford, south of Penkridge/west of Cannock, near Trescott and near Beckbury. Ideally any plan to restore peatland, should wherever possible include management of the catchment areas that support the peatland. We would advise extending this approach to shallow peaty areas in addition to deep peats.
 3. Identify opportunities to increase tree and woodland cover consistent with the UK target. Wherever possible, this should provide multi-functional benefits. Planting on peatlands and other open habitats must be avoided.
 4. Identify areas where nature-based solutions can provide benefits to people whilst reducing climate change vulnerability in the natural environment.
 5. Identify habitats and protected sites that are particularly vulnerable to the impacts of climate change and consider how the planning system can work to reduce these vulnerabilities.

We advise that these actions are integrated into a strategic approach alongside green infrastructure, health and wellbeing, biodiversity net gain, natural flood management, air and water quality to deliver multifunctional benefits to people and wildlife. The Plan should make clear that development will be consistent with these policies, to ensure sustainable development is properly achieved across the Plan period. Meaningful targets should be set that can be appropriately monitored over the Plan period to demonstrate the effectiveness of the Plan/Policy in addressing climate change and to ensure appropriate remedial action can be taken as necessary.

Further information on climate change resources can be found in Annex 2. Natural England would be happy to advise further on this aspect of the Local Plan development.

NB7 - Managing flood risk, sustainable drainage systems & water quality

Natural England expects the Plan to consider the strategic impacts on water quality and resources as outlined in paragraph 170 of the NPPF. We would also expect the plan to address flood risk management in line with the paragraphs 155-165 of the NPPF.

The Local Plan should be based on an up to date evidence base on the water environment and as such the relevant River Basin Management Plans should inform the development proposed in the Local Plan. These Plans (available [here](#)) implement the EU Water Framework Directive and outline the main issues for the water environment and the actions needed to tackle them. Local Planning Authorities must in exercising their functions, have regard to these plans.

The Local Plan should contain policies which protect habitats from water related impacts and where appropriate seek enhancement. Priority for enhancements should be focussed on European sites, SSSIs and local sites which contribute to a wider ecological network.

Plans should positively contribute to reducing flood risk by working with natural processes and where possible use Green Infrastructure policies and the provision of SUDs to achieve this.

NB10 - Canal network

We support the measures to integrate the canal network into the wider green infrastructure network.

Question 12:

a) It is proposed that the fully drafted policies in this document (Policies DS1-DS4 and SA1-SA7) are all strategic policies required by paragraph 21 of the NPPF. Do you agree these are strategic policies? Yes/No

b) Are there any other proposed policies in Chapter 6 that you consider should be identified as strategic policies? Yes/No

If yes, then please provide details including the Policy Reference (e.g HC1 – Housing Mix)

We do not have any comments to make on this at this time.

Additional comments/advice

Strategic and cross boundary issues -Air quality

There will need to be an assessment of 'in combination' effects from air quality on designated sites. This will need to involve neighbouring Local Planning Authorities in respect of plans and projects which in combination may have significant effects on European Sites in the area.

Soil and Best and Most Versatile agricultural land.

Currently policies and supporting text are not adequately in line with paragraph 174 a) and b) of the [National Planning Policy Framework](#) or the government's [25 Year Environment Plan](#).

The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpin our well being and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver, for example:

- Safeguard the long term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future.
- To avoid development that would disturb or damage other soils of high environmental value (e.g. wetland and other specific soils contributing to ecological connectivity, carbon stores such as peatlands etc) and, where development is proposed.
- Ensure soil resources are conserved and managed in a sustainable way.
- The plan should also recognise the important role soil plays in carbon storage- see [Carbon Storage and Sequestration by Habitat](#) for further information.

The plan should include a clear and correct definition of best and most versatile (BMV) agricultural land and high quality agricultural land. (see page 22 of plan- best and most versatile agricultural land is identified incorrectly as only grades 1 and 2.) The Council may find it helpful to look at [Natural England's Technical Information Note 049 on Agricultural Land Classification \(ALC\)](#) which describes the ALC system including the definition of BMV land, existing ALC data sources and their relevance for site level assessment of land quality and the appropriate methodology for when detailed surveys are required.

We would advise that the plan refers to sources of ALC and BMV mapping and data which will include but not limited to: the www.magic.gov.uk website and Natural England. For example [Agricultural Land Classification map West Midlands Region \(ALC004\)](#) and [Likelihood of Best and Most Versatile \(BMV\) Agricultural Land - Strategic scale map West Midlands Region \(ALC016\)](#).

To support plan allocations (and subsequent planning applications) relevant polities should refer to the [Defra Code of practice for the sustainable use of soils on construction sites](#) and sites (over 5ha agricultural land) should have a site-specific Soils Management Plan informed by a detailed Agricultural Land Classification (ALC) and soil resource survey, in line with best practice guidance.

Access and Rights of Way

Natural England advises that the Plan should include policies to ensure protection and enhancement of public rights of way and National Trails, as outlined in paragraph 100 of the [National Planning Policy Framework](#). Recognition should be given to the value of rights of way and access to the natural environment in relation to health and wellbeing and links to the wider green infrastructure network. The plan should seek to link existing rights of way where possible, and provides for new access opportunities.

The plan should avoid building on open space of public value as outlined in paragraph 99 of the [National Planning Policy Framework](#).

The plan should make provision for appropriate quantity and quality of green space to meet identified local needs as outlined in paragraph 98 of the NPPF. Natural England's work on [Accessible Natural Greenspace Standard \(ANGSt\)](#) may be of use in assessing current level of accessible natural greenspace and planning improved provision.

Habitats Regulation Assessment (HRA)

We welcome the HRA and note that the assessment has concluded that further information is required.

We wish to provide the following advice:

Air pollution

- Motte Meadows SAC is adjacent to Marston Road. The SAC is in exceedance for ammonia and for nitrogen deposition the site is currently exceeding the lower threshold and is close to exceeding the upper threshold (Source: [APIS](#)).

Midland Mere & Mosses Phase 2 (Aqualate Mere SSSI) is adjacent or within 200m of several roads including Guild Lane and Walkley Bank. The site is in exceedance for ammonia and significantly exceeding for nitrogen deposition (Source: [APIS](#)).

Why have air quality impacts not been identified as a risk for the above sites? What is the justification for excluding this site? Do you have evidence? I.e. a traffic assessment/modelling?

- We advise you to refer to [Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations](#).

Sustainability Appraisal Report

Having reviewed the above report we have a couple of queries:

- Having seen Table 6.1 assessment for Wheaton Aston, we would like to understand further how site 610 for example was selected when site 614 scored better.
- We note that the report has not been able to undertake a comprehensive assessment of impacts on best and most versatile land classed as grade 1,2,3a in the agricultural land classification due to a lack of site specific ALC studies. How is the Council justifying allocating on BMV land?

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Gillian Driver on 0208 02 60995. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Gillian Driver

Ms Gillian Driver
Lead Adviser
Land use planning – West Midlands Area Team

Annex A

Sources of local plan evidence on the natural environment

The following sources of evidence may be useful in ensuring local plans are evidence based, in line with paragraph 31 of the National Planning Policy Framework (NPPF) and assist in meeting Strategic Environmental Assessment (SEA) requirements. A range of additional locally specific evidence is also likely to be needed to underpin plan preparation.

General natural environmental evidence

[National Character Areas](#) (NCAs) divide England into 159 distinct natural areas. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan.

Natural England has also published downloadable [natural capital maps](#). These are a suite of ten maps, of different aspects of natural capital, contributes to our understanding of where our natural capital is.

The [Magic](#) website will provide you with much of the **nationally held natural environment data** for your plan area in downloadable GIS format. Specific data sets are listed under the environmental topics below.

[Local environmental record centres](#) may hold a range of additional information on the natural environment, principally ecological.

The following local organizations may also hold environmental information where applicable: Local Nature Partnerships, Wildlife trusts, Areas of Outstanding Natural Beauty, and [Nature Improvement Areas](#).

Evidence relating to the **significant environmental effects of the current local plan** should be available (in line with SEA legislation), as should suitable biodiversity evidence for any plan adopted after the NPPF came into effect (27 March 2012), usually through the current plan's Annual Monitoring Report.

Landscape

The [Magic](#) website provides data on the extent of protected landscapes (**National Parks and Areas of Outstanding Natural Beauty**).

National Park/Area of Outstanding Natural Beauty Management Plans may also be a source of useful evidence. These are usually found on these organisations websites.

Most areas have local **landscape character assessments**. These are tools to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area.

Data on **tranquillity** is held by [CPRE](#). They also hold mapping data on [light pollution](#) .

Biodiversity and geodiversity

The most relevant layers on [Magic](#) for you to consider are **Ancient Woodland, Local Nature Reserves, Priority Habitat Inventory, Sites of Special Scientific Interest** (including their **impact risk zones**), **Special Areas of Conservation, Special Protection Areas, and Ramsar Sites** (including, where relevant, marine designations).

You may also wish to draw on more detailed information on specific [Sites of Special Scientific Interest](#) and the [Conservation Objectives](#) and [Site Improvement Plans](#) for **Special Areas of Conservation** and **Special Protection Areas**.

[Priority habitats and species](#) are those listed under Section 41 of the Natural Environment and Rural Communities Act, 2006 and UK Biodiversity Action Plan (UK BAP). Larger areas of priority habitat will usually be mapped either as **Sites of Special Scientific Interest** on the Magic website or as **Local Wildlife Sites or Local Geological Sites**. **Local wildlife site** data is usually held by local planning authorities themselves as is **local geological site** data. Local Environmental Record Centres and local wildlife and geoconservation groups are also a source of information on Local Sites.

Natural England maintains the **Open Mosaic Habitat on Previously Developed Land Inventory** (a priority habitat dataset currently not integrated into the Priority Habitat Inventory on [Magic](#)) and is available on request from Natural England via email;

NaturalEnglandGIDataManagers@naturalengland.org.uk.

Local Biodiversity Action Plans (LBAPs) identify the local action needed to deliver UK targets for habitats and species. They also identify targets for other habitats and species of local importance and can provide a useful blueprint for biodiversity enhancement in any particular area. Local Geodiversity Action Plans (LGAPS) identify agreed local action for geodiversity, a list of active LGAPs can be found at [UK Geodiversity Action Plan](#).

Some areas have identified **Biodiversity Opportunity Areas** or similar for spatially targeting biodiversity restoration work.

Protected species are those species protected under domestic or European law. [Local environmental record centres](#) are likely to hold much of the available data on such species.

Air Quality

[APIS](#) holds data on air pollution in particular in relation to protected nature conservation sites.

Access

The [Magic](#) website holds the following access related data: **National Trails, Public Rights of Way (on the Ordnance Survey base map), Open Access Land (the Countryside and Rights of Way Act 2000 layer), together with national and local nature reserves, country parks** and the [England Coast Path](#).

Locally held data will include the **definitive Public Rights of Way**, and may include **Rights of Way Improvement Plans** where they exist, and any locally mapped **open space audits or assessments**.

Natural England's work on [Accessible Natural Greenspace Standards \(ANGSt\)](#) may be of use in assessing current level of accessible natural greenspace and planning improved provision.

Green infrastructure

Green infrastructure strategies may comprise or contain useful evidence sources where they exist.

The [England Green Infrastructure Mapping Database \(NERR105\)](#) is designed to provide technical evidence on the Green Infrastructure of England as an open data product under Open Government License (OGL) conditions.

Soils

A provisional Agricultural Land Classification (ALC) map is on [Magic](#), and the GIS layer 'Likelihood of Best and Most Versatile Land' is available on request from Natural England via email; NaturalEnglandGIDataManagers@naturalengland.org.uk.

Some areas already have detailed ALC maps. The coverage of existing detailed MAFF post 1988 ALC surveys is shown on [Magic](#). The MAFF post 1988 ALC survey reports and maps themselves are available from [Natural England](#) or from [Gov.UK](#).

Our publication [Agricultural Land Classification: protecting the best and most versatile agricultural land](#) may also be of help.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](#) website and also from the [LandIS](#) website, which contains more information about obtaining soil data.

Climate change

The [Climate Change Adaptation Manual](#) provides evidence to support nature conservation in a changing climate.

Landscape scale climate change assessment method (found in the Adaptation Manual) which is based on the [NCA method](#).

Natural England's [Nature Networks Evidence Handbook](#) identifies the principles of nature network design and describes the evidence that underpins the desirable features of nature networks.

The [Carbon Storage and Sequestration by Habitat](#) report provides evidence and support for nature-based solutions for net zero.

The [National Biodiversity Climate Change Vulnerability Assessment Model](#) provides a spatially explicit assessment of the relative vulnerability of priority habitats. The data files can be accessed here: [National Biodiversity Climate Change Vulnerability Assessment data](#).

The [LWEC Climate Change Impacts Report Cards](#) present the latest evidence on how climate change is affecting different aspects of our environment, economy and society

Water Quality and Resources and Flood Risk Management

The Planning Practice Guidance provides guidance on [information sources for the water environment](#).

Annex 2

Climate change – further resources

Natural England has published a range of resources to help with the recommended actions. Please see below links to further resources that may be useful in developing local policy to address climate change within the local authority area.

- The [Climate Change Adaptation Manual](#) - provides extensive information on climate change adaptation for the natural environment. It considers the potential impacts of climate change on individual priority habitats and outlines possible adaptation responses. It includes the Landscape Scale Adaptation Assessment Method to assist those wanting to undertake a climate change vulnerability assessment for an area larger than an individual site or specific environmental feature, focussing on identifying vulnerabilities to climate change.

- The [National Biodiversity Climate Change Vulnerability Model](#) is a mapping tool that helps identify areas likely to be more vulnerable to the impacts of climate change.
- [Carbon Storage and Sequestration by Habitat 2021 \(NERR094\)](#) – a recently updated report that reviews and summarises the carbon storage and sequestration rates of different semi-natural habitats that can inform the design of nature-based solutions to achieve climate mitigation and adaptation.
- The [Nature Networks Evidence Handbook](#) – aims to help the designers of nature networks by identifying the principles of network design and describing the evidence that underpins the desirable features of nature networks. It builds on the Making Space for Nature report of Lawton et al. 2010), outlining some of the practical aspects of implementing a nature network plan, as well as describing the tools that are available to help in decision making.
- [Natural England Climate Change webinars](#) - a range of introductory climate change webinars available on YouTube.

In addition the following sources may prove useful:

[Net Zero- The UK's contribution to stopping global warming](#)

[Cities on the route to 2030 -Building a zero emissions, resilient planet for all](#)