
South Staffordshire Local Plan Review Publication (Regulation 19) Consultation

Response Prepared on behalf of L&Q Estates

December 2022

South Staffordshire Local Plan Review
Regulation 19 Publication Plan

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1.0 INTRODUCTION

- 1.1 We write on behalf of our client, L&Q Estates, in relation to their interests at land at Yieldfields Farm, Bloxwich (hereafter referred to as 'the Site'). L&Q Estates welcome the opportunity to be involved in the preparation of the South Staffordshire Local Plan, and it is within this context that we wish to respond to the Publication (Regulation 19) Consultation.
- 1.2 This response is framed within the tests of soundness as set out in Paragraph 35 of the National Planning Policy Framework ('NPPF'). Plans are sound if they are:
- a) **'Positively prepared** - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.
 - b) **Justified** - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.
 - c) **Effective** - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.
 - d) **Consistent with national policy** - enabling the delivery of sustainable development in accordance with the policies in the Framework and other statements of national planning policy, where relevant.'
- 1.3 Where relevant, this response identifies whether the Local Plan is not legally compliant, is unsound or fails to comply with the duty to co-operate, as well as identifying modifications considered necessary to make the Local Plan sound.
- 1.4 This response has regard to the Local Plan Review Evidence Base, with specific reference made to:
- Green Belt Study Addendum 2022
 - Sustainability Appraisal 2022
 - Housing Site Selection Paper 2022

Previous Representations

- 1.5 L&Q Estates have previously submitted the Site to the South Staffordshire Call for Sites exercise in November 2017, in addition to making Representations to the Issues and Options Consultation in November 2018 (under their previous name Gallagher Estates), the Spatial Housing Strategy and Infrastructure Delivery Consultation in October 2019 and the Preferred Options Consultation in December 2021.

- 1.6 This Response should accordingly be read in conjunction with these previous responses. In particular, L&Q Estates is disappointed to note that a number of comments relevant to the overall level of growth and the spatial strategy within its Preferred Options response have not been addressed by the Council.
- 1.7 A number of comments have also previously been provided in respect of minor recommended alterations to development management policies within the Plan. Whilst these comments do not go to the heart of the tests of soundness, they nonetheless remain relevant in ensuring that the plan is clear and legible for applicants and decision-makers. It is therefore recommended that the Council revisits these responses.

Land at Yieldfields Farm

- 1.8 The Site is shown outlined in red on Drawing RG-M-30 (**Appendix 1**) and is located on the northern edge of Bloxwich. The Site falls within two administrative boundaries; the northern part of the Site lies within South Staffordshire District and the southern part is within Walsall Borough. The Site has also been promoted through the various stages of the now abandoned Black Country Plan 2039.
- 1.9 The southern section of the Site located in Walsall previously had a draft housing allocation for 978 homes within the draft Black Country Plan 2039, under Policy WSA4, until the Black Country Authorities ceased work on the Plan in October 2022. An extract from Policy WSA4 of the Draft Black Country Plan 2039 is included at **Appendix 2**.
- 1.10 Whilst this Plan is no longer being pursued, it remains that the evidence upon which it was drafted was sound. In this regard, it should be noted that Walsall Council has already commenced work regarding the preparation of a stand-alone local plan with a view to consulting on an Issues and Options document in September 2023. It is therefore considered likely that the southern section of the Site will remain allocated for development through the emerging Walsall Local Plan.
- 1.11 A Concept Masterplan (included at **Appendix 3**) has been prepared which illustrates how the land within South Staffordshire could be developed to provide approximately a total of up to 900 homes alongside a primary school, allotments and public open space. A separate Phasing Plan (included at **Appendix 4**) shows land to the west of Stafford Road, which is within L&Q Estates' control, as comprising a final/future phase of development with potential to provide up to 174 homes.
- 1.12 The Site is deliverable, available and suitable for release from the Green Belt to deliver a high quality residential-led development that will significantly assist in meeting South Staffordshire's identified housing need, as well as the unmet need from the Greater Birmingham and Black Country Housing Market Area ('GBBCHMA').

2.0 POLICY DS4 – DEVELOPMENT NEEDS

Policy DS4 is not considered to be sound as it is not positively prepared, not justified and not consistent with national policy for the following reasons:

- 2.1 Policy DS4 – Development Needs is a Policy which has been newly introduced following the previous 'Preferred Options' consultation. The policy states that the Council will promote the delivery of a minimum of 9,089 homes over the period 2018-2039, providing approximately 13% additional homes to ensure plan flexibility. It goes on to state that the housing target includes a 4,000-home contribution towards unmet housing needs of the GBBCHMA.
- 2.2 The Council has set out the elements that make up this housing requirement in Table 7 of the Plan (reproduced below – our Table 1). It states that South Staffordshire's own housing need using the Government's standard method (2022-2039) is 4,097 dwellings, that there have been 992 dwellings completed between 2018-2022, and that they are contributing 4,000 dwellings to contribute towards the unmet needs of the GBBCHMA.

Table 1: South Staffordshire Housing Target (Adapted from Local Plan Table 7)

| | |
|--|--------------|
| South Staffordshire's own housing need using the Standard Method (2022-2039) | 4,097 |
| Completions in the district since the start of the plan period (2018-2022) | 992 |
| Additional housing to contribute towards the unmet needs of the GBBCHMA | 4,000 |
| Total number of dwellings to be planned for | 9,089 |

- 2.3 L&Q Estates fully supports the Council in making a contribution towards the unmet housing need arising from GBBCHMA, despite the Black Country Authorities recently choosing to abandon the preparation of the Black Country Plan. L&Q Estates supports the inclusion of a contribution towards unmet need, as this need remains real, evidenced and immediate, irrespective of the policy vacuum that exists elsewhere within the Black Country. It remains that this unmet need is also derived from Birmingham, as well as the Black Country. This contribution should therefore not be abandoned in light of the abandonment of the Black Country Plan.
- 2.4 However, it is considered that even the provision of 4,000 dwellings is insufficient in meeting unmet need arising from within the GBBCHMA.
- 2.5 The GBBCHMA was first established via the evidence base for the Birmingham Development Plan, namely the Strategic Housing Needs Study Stage 2 Report (November 2014). This defined the HMA as comprising of two Local Enterprise Partnership areas together with South Staffordshire, North Warwickshire and Stratford-on-Avon. This HMA has subsequently been taken forward by later evidence base documents, including the Strategic Growth Study (2018). Recognising the existing and emerging shortfalls, the fourteen GBBCHMA local authorities

jointly prepared the GBBCHMA Strategic Growth Study, which drew together existing evidence on housing supply and need across the entire housing market area. It was estimated at that time that the unmet needs of the GBBCHMA sat at around 28,000 dwellings up to 2031, rising to nearly 61,000 dwellings by 2036.

- 2.6 Evidence from the Strategic Growth Study was used to propose to test an additional contribution of 4,000 dwellings to the unmet needs of the GBBCHMA in South Staffordshire's Local Plan Review, based on the scale of growth implied in the District by the strategic locations identified in the Strategic Growth Study.
- 2.7 South Staffordshire District Council will nonetheless be aware that Birmingham City Council has recently undertaken an 'Issues and Options' consultation in respect of its new local plan (The Birmingham Plan). This document identifies a housing need for Birmingham of 7,136 dwellings per year, amounting to 142,662 dwellings¹ over the plan period. Of these, the document identifies a supply of available land with capacity for 70,871 dwellings leaving a shortfall 78,415 dwellings over the period 2020 to 2042. This document effectively renders the level of need planned for within the Strategic Growth Study as being out-of-date.
- 2.8 This shortfall is significant and over twice the shortfall contained within the adopted Birmingham Development Plan ('BDP'). Policy PG1 of the Birmingham Development Plan confirms the shortfall to be 37,900 dwellings up to 2031. To date, there remains only one local authority (North Warwickshire) within an adopted Local Plan that considers unmet housing need.
- 2.9 Even if the other authorities within the HMA, including South Staffordshire, adopted and delivered upon their draft contributions, the 'best case' scenario is that a shortfall of 67,695 dwellings remains (see Table 2 below). It should be noted that this figure does not include consideration of unmet need arising from within the Black Country, which is understood to be around 36,819 homes². The potential GBBCHMA shortfall accordingly amounts to in excess of 100,000 homes.

¹ Taking completions into account

² Black Country Urban Capacity Review Update (May 2021)

Table 2: Birmingham’s Residual Unmet Local Housing Need

| | Potential Outcomes | | |
|---------------------------------------|---------------------------|---------------|---------------|
| Birmingham Shortfall 2020-2042 | 78,415 | | |
| North Warwickshire ‘excess’ | 3,790 | | |
| Solihull ‘excess’ | | 2,000 | |
| Lichfield ‘excess’ | | 665 | |
| South Staffordshire ‘excess’ | | 4,000 | |
| Stratford-on-Avon ‘excess’ | | 265 | |
| Residual Unmet Need | 74,625 | 72,625 | 67,695 |

- 2.10 There is therefore significant justification for South Staffordshire District Council to increase its contribution to meeting unmet need arising from the GBBCHMA, given the current contribution of 4,000 only amounts to around 4% of the identified shortfall.
- 2.11 In light of the above, L&Q Estates consider that further strategic housing sites, including Yieldfields Farm, should be allocated within the South Staffordshire Local Plan. The housing requirement in South Staffordshire should be increased to take account of the fact that the 4,000 dwelling contribution is based upon out-of-date evidence.
- 2.12 We consider that the Site, which has capacity to deliver 900 new homes in a sustainable location, would assist South Staffordshire in achieving the district’s housing needs. In addition, the Site’s proximity to Bloxwich, which can easily be accessed via sustainable modes of transport, means that it is a suitable location to contribute substantially towards the unmet needs of the Black Country. Indeed, the southern section of the Site previously benefitted from an allocation for up to 978 homes within the Draft Black Country Plan 2039.
- 2.13 Whilst this Plan is no longer being pursued, it remains that the evidence upon which it was drafted was sound. In this regard, it should be noted that Walsall Council has already commenced work regarding the preparation of a stand-alone local plan with a view to consulting on an Issues and Options document in September 2023. It is therefore considered likely that the southern section of the Site will remain allocated for development through the emerging Walsall Local Plan.

3.0 POLICY DS5 – THE SPATIAL STRATEGY TO 2039

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

- 3.1 Policy DS5 identifies a settlement hierarchy for South Staffordshire District, which includes '*Growth adjacent to the neighbouring towns and cities in the Black Country*' as its own distinct tier.
- 3.2 As set out within our response above to Policy DS4 (Development Needs), Barton Willmore, now Stantec, has considered the significant implications of Standard Method when it comes to reviewing the emerging Birmingham Local Plan and the policy vacuum left by the abandonment of the Black Country Plan.
- 3.3 As part of the Standard Method, both Birmingham and Wolverhampton are subject to a 35% uplift in housing need, reflecting their status as two of the top 20 most populated urban centres within England.
- 3.4 Taking all of this into account, Barton Willmore, now Stantec has calculated that a substantial housing shortfall will continue to arise across the GBBCHMA up to 2042. This shortfall is considered to be in excess of 100,000 homes.
- 3.5 Whilst Policy DS5 seeks to deliver the housing need identified through Policy DS4, we consider that further housing allocations are required, given the GBBCHMA shortfall represents a 'best case scenario'. The shortfall could increase even further as the supporting evidence base continues to be tested.
- 3.6 In light of the above, we consider that further strategic housing sites, including Yieldfields Farm, should be allocated within the South Staffordshire Local Plan, in order to assist the Council in meeting the District's proposed future housing need, in addition to the significant unmet needs of the Greater Birmingham HMA. Such an allocation would be consistent with the tier '*Growth adjacent to the neighbouring towns and cities in the Black Country*'.
- 3.7 Importantly the southern section of the Site, located in Walsall, previously benefitted from a draft housing allocation for 978 homes in the Black Country Plan 2039. We consider that the Site's proximity to the urban area of Bloxwich, which can easily be accessed via sustainable modes of transport, means that it could have a significant role in meeting the cross boundary unmet needs of the Black Country and provides an opportunity to create a sustainable new community. This is further demonstrated by the Concept Masterplan submitted as part of this response, which demonstrates that the whole site (i.e. land within South Staffordshire and Walsall) is capable of delivering up to a total of 1,900 new homes, alongside the provision of two primary schools, local services and facilities as well as significant open space.

3.8 The need to deliver a sufficient supply of homes is emphasised in the NPPF and Paragraph 60 identifies that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. In addition, Paragraph 73 of NPPF confirms that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as significant extensions to existing villages or towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. Paragraph 73 further identifies that strategic policy-making authorities should work with other authorities, if appropriate, to identify sustainable locations for such development where this could help to meet identified needs in a sustainable way. It is therefore considered providing large urban extensions focused to the north of the Black Country where there is an unmet housing need, aligns with the aims of NPPF.

4.0 POLICY DS6 – LONGER TERM GROWTH ASPIRATIONS FOR A NEW SETTLEMENT

Policy DS6 is not considered to be sound as it is not justified and not consistent with national policy for the following reasons:

- 4.1 Policy DS6 states that it is a key longer-term aspiration of the Council to explore potential options within the district for a sustainable independent new settlement. It is not anticipated that a new settlement will contribute to housing growth during the current Plan period.
- 4.2 Whilst we support the policy approach of draft Policy DS6, we consider that the Council should be providing more strategic housing allocations to meet the current needs of the District during the plan period, owing to the fact that the District's housing need figure is calculated using the Standard Method for calculating housing need. We consider that South Staffordshire's proposed housing need figure is only a starting point, and that additional housing will be required to meet unmet need arising from within the GBBCHMA.
- 4.3 Indeed, Paragraph 22 of the NPPF identifies that, where a new settlement forms part of the Spatial Strategy, policies should be set within a vision that looks further ahead (at least 30 years) to account for the likely timescale for delivery.
- 4.4 We note that the Council has looked to allocate suitable brownfield sites to reduce pressure on the District's Green Belt. However, these sites are very limited due to the largely rural nature of the district, and most large-scale site options on brownfield land are either in isolated rural locations or form part of the District's employment land supply and need to be retained to ensure the District can meet its employment land needs. Furthermore, the Council is under pressure to meet its own housing needs over the plan period, whilst also making a contribution towards the unmet needs of the GBBCHMA. Therefore, we consider that South Staffordshire Council, through the preparation of the Local Plan, is able to demonstrate that exceptional circumstances exist to remove certain areas of land from the Green Belt to meet housing needs.
- 4.5 In addition, it should be noted that local authorities should not shy away from higher housing numbers just because Green Belt release will be needed to achieve these numbers. Broader spatial objectives can and should be taken into account to justify higher employment land and housing figures, as demonstrated in the High Court ruling on the three statutory challenges to the adoption of the Guildford Local Plan (in *Compton Parish Council & Ors v Guildford Borough Council & Anor [2019] EWHC 3242 (Admin)*):
- 4.6 "*Exceptional circumstances*" is a less demanding test than the development control test for permitting inappropriate development in the Green Belt, which requires "*very special circumstances*." That difference is clear enough from the language itself and the different

contexts in which they appear, but this is evidenced in *R(Luton BC) v Central Bedfordshire Council* [2015] EWCA Civ 537 at Paragraph 56. As pointed out in *IM Properties Development Ltd v Lichfield DC* [2014] EWHC 2240 at Paragraphs 90-91 and 95-96, there is no requirement that Green Belt land be released as a last resort, nor was it necessary to show that assumptions upon which the Green Belt boundary had been drawn, had been falsified by subsequent events.

- 4.7 This High Court judgment provides clarity on the circumstances under which the exceptional circumstances test can be met. It substantiated the ability for Local Planning Authorities to release Green Belt land over and above the precise housing need requirements to allow for flexibility and for a sound and integrated approach to the proper planning of the area.
- 4.8 Draft Policy DS4 seeks to explore potential options within the district for a suitable independent new settlement which has the capacity to accommodate the future housing and economic needs of the district beyond the current plan period. However, we consider that additional housing is required over the plan period to meet the significant unmet needs of the GBBCHMA. Therefore, all suitable new settlements should be considered and assessed as part of this Local Plan Review.

5.0 POLICIES SA1-SA4 – STRATEGIC DEVELOPMENT LOCATIONS

Policies SA1 – SA4 are not considered to be sound as it is not positively prepared, not justified and not consistent with national policy for the following reasons:

- 5.1 The Council has produced a *Housing Site Selection Topic Paper (November 2022)*, which follows the previous *Housing Site Selection Topic Paper (September 2021)* which both form part of the evidence base supporting the Local Plan.
- 5.2 Both documents set out how the Council will assess and allocate housing site options to meet its proposed housing target for the Local Plan. It summarises which sites are proposed for housing and which are not, including summary reasons for this decision. To ensure all relevant factors for site selection are highlighted on a site-by-site basis, the Council has prepared proformas for each of the sites shortlisted for assessment (included at Appendix 3 of the *Housing Site Selection Topic Paper*). Within the site assessment proformas, major positive and major negative effects arising within the post-mitigation site assessments in the Sustainability Appraisal are recorded. These findings are linked to the linked to the Sustainability Appraisal, which has also been updated in 2022.
- 5.3 The conclusions of both the 2022 SHLAA update and 2022 Housing Site Selection Topic Paper remain identical in respect of assessing Land at Yieldfields Farm (Site Ref: 492 a, b and c).
- 5.4 As such, and as submitted in our response to the Preferred Options Consultation in December 2021, we do not support the proposed strategic housing allocations in Policies SA1-SA4 as it is considered that there are more suitable sites within the Plan area that have not been adequately considered or included for allocation. In particular, we consider that Yieldfields justifiably represents a sustainable location for housing and should be included within any proposed site allocations with the Local Plan Review based on its sustainability credentials.
- 5.5 The key positive and negatives for the Site (Sites 492 a, b & c - Land at Yieldfields Farm north of Bloxwich) are included below.

Major Positive Effects

- Site presents an opportunity for a mixed-use urban extension with on-site local facilities

Major Negative Effects

- Higher Green Belt harm than the majority of land in this broad location (site is 'very high')
- Part of site is in higher landscape sensitivity to the majority of land in this broad location (site is 'moderate')
- Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an

unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence.

- May require allocation of significant additional land in neighbouring local authority (Walsall) to be delivered

- 5.6 The site proforma included in the Housing Site Selection Topic Paper 2022 concludes that, when considering all site assessment factors set out in the proforma, Yieldfields is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 646 a&b and 486c.
- 5.7 The principal reason for not including Yieldfields as a strategic housing allocation within the Plan is due to its perceived higher Green Belt harm than the majority of land in the broad location. In addition, the site proforma states that part of the Site is in higher landscape sensitivity to the majority of land in this broad location. However, the South Staffordshire Green Belt Study (SSGBS) was undertaken in July 2019, before the southern section of the Site located in Walsall had been included as a draft allocation in the emerging Black Country Plan 2039 (Walsall strategic housing allocation Policy WSA4).
- 5.8 Whilst a Green Belt Addendum 2022 has subsequently been prepared, this document only considers an additional sub-parcel assessment³ which lies outside of the area encompassed by the original Stage 2 assessment. It does not revisit the assessment relevant to Yieldfields Farm.
- 5.9 As set out within Barton Willmore's Green Belt Advice Note (included at **Appendix 5**), when considering the Site as a consolidated whole (i.e. land within South Staffordshire and Walsall), the development of the Site, in accordance with the key landscape and visual opportunities outlined within the Landscape, Visual and Green Belt Appraisal (December 2019), would result in lower levels of potential harm to the Green Belt than is reported in the South Staffordshire Green Belt Study, and would not significantly weaken the integrity of the surrounding Green Belt.
- 5.10 Furthermore, as noted in Barton Willmore's Landscape and Visual and Green Belt Appraisal (LVGBA) (**Appendix 6**), the existing extents of built form along the A34 corridor towards settlements to the north have created a situation in which the urban area of Bloxwich has sprawled and there is potential for merging of towns. However, a shallow ridgeline on the northern edge of the Site provides the basis for reinforcement through green infrastructure provision to create physical features that are readily recognisable and likely to be permanent.
- 5.11 There is potential for sensitive development of the Site within the topographical containment provided by the shallow ridgeline extending through the northern part of the site; within the

³ Adjacent to Junction 12 of the M6.

existing extent of development along the A34 north of Bloxwich; and avoiding development of the land in the eastern edge of the Site which is less subject to urbanising influences than those areas nearer the A34. The Concept Masterplan (Appendix 3) sets out to create a landscape buffer and soft edge/transition along the perimeter/edge of the new development to soften the visual impact on the surrounding countryside, thus providing a clearly defined and defensible Green Belt boundary in accordance with South Staffordshire's proposed development strategy (Strategic Objective 1). In addition, the Site would also provide a network of green links, streets and spaces which will provide pedestrian and cycle routes to public rights of way, improving access to the remaining Green Belt.

- 5.12 Another reason for not including Yieldfields as a strategic housing allocation is that the Site may require the allocation of significant additional land in Walsall in order for the development to be delivered. As set out previously, the southern section of the Site located in Walsall has previously benefitted from a draft housing allocation for 978 homes within the draft Black Country Plan 2039, under Draft Policy WSA4, prior to its recent withdrawal. There is therefore a clear direction that the Site may be collectively brought forward for development in the near future. In this context, Walsall Council has now begun preparing its own stand-alone local plan. The benefits of delivering a holistic scheme across the administrative boundaries of both Walsall and South Staffordshire are demonstrated by the Concept Masterplan, which shows how the entire site could deliver up to a total of 1,900 new homes, alongside the provision of two primary schools, local services and facilities as well as significant open space. In addition, this masterplan would deliver new green infrastructure together with ecological improvements and benefits.
- 5.13 Barton Willmore has undertaken a site-specific appraisal of the Site (included at **Appendix 7**) against the SA objectives based on the preliminary technical analysis and reports that have been prepared to inform the masterplanning process. The site appraisal follows the methodology and matrix used in the SA and reviews the Site against the SA scoring criteria.
- 5.14 The appraisal demonstrates that the Site represents a justifiable location for future residential-led development, which proposes approximately up to 900 homes within South Staffordshire and, as shown on the Concept Masterplan, a primary school, varied public open space and recreational facilities and allotments. Based on the reports available for the Site, we consider that the Site scores well against the 12 SA objectives. The site was awarded eight positive scores (+ and ++), two negative scores (-) and two negligible scores (0).
- 5.15 Following an appraisal of the Site, it is clear that a) Yieldfields justifiably represents a sustainable location for housing and b) Yieldfields should be included within any proposed site allocations within the Local Plan Review based on its sustainability credentials.

- 5.16 The Site is suitably located in proximity to existing and proposed local facilities, public transport, employment opportunities and green spaces, and will add to the current services available in the area through the provision of approximately up to 900 homes, a primary school, public open space and recreational opportunities and allotments. The closest bus stops are located 650m from the Site, whilst the closest rail station is located 1.8km from the Site; both are easily accessible via the local road and pedestrian networks, reducing the reliance on private vehicular access, and resultant emissions. There are also several PRoW in proximity of the Site which future development could connect with in order to improve sustainable accessibility and connectivity to the wider area.
- 5.17 The Site has the potential to retain and enhance elements of the landscape, green infrastructure network and pedestrian and cycling routes in the existing and new community, providing benefits in relation to several objectives, including climate change mitigation and adaptation, biodiversity, health and wellbeing and economy and employment. Enhancement of the green infrastructure network will also provide benefit to the local Green Belt, by further supporting barriers to urban sprawl, and biodiversity features onsite through the provision of enhanced habitat and foraging provision.
- 5.18 Further afield, statutory and non-statutory ecological designations outside of the site footprint are not expected to be adversely affected by the future development due to their distance from site, and intervening development. The Site presents the opportunity to contribute to green corridors in the area, linking up networks of green spaces, including the canal corridor to the west.
- 5.19 The cumulative beneficial impacts of these points altogether should also be assessed. The above is contrasted to those reasonable alternative sites selected in the 2021 SA based on Option G of the Spatial Housing Strategy and Infrastructure Delivery SA Report, including those sites at Pattingham, Kinver, and other more rural locations. Appendix 2 included in Barton Willmore's review of the SA demonstrates that Yieldfields scores considerably better (more positively) than Policy SA3: Strategic development location: Land north of Linthouse Lane (Site 486c) which has been identified as a strategic housing allocation in the Preferred Options Consultation document.
- 5.20 Land north of Linthouse Lane is awarded just four positive scores against the 12 SA Objectives. This site does not have the benefit of being within close proximity to a railway station, with the nearest being Bloxwich North, located over 5km to the east. Therefore, new residents would likely rely heavily on private car use for means of transport to access employment and community facilities, increasing emissions and effects on climate change and health.

- 5.21 Land north of Linthouse Lane is given a score of uncertain for SA Objective 1 Climate Change Mitigation, however given the above we consider this should be given a negative score due to the lack of sustainable transport options.
- 5.22 Land north of Linthouse Lane is relatively isolated in terms of existing green spaces, and it is unclear how any proposed green infrastructure would link with existing networks to create meaningful corridors and connections for the benefit of biodiversity habitats as well as human health and wellbeing.
- 5.23 The reasons put forwards for development at Land north of Linthouse Lane include that this location is well connected to the Black Country urban area which means residents will have good access to services and employment opportunities in the adjacent towns and cities.
- 5.24 Given the scoring for Yieldfields (as summarised in the table below), which demonstrates that this site achieves the above and scores better against the SA Objectives, it is unclear why Yieldfields has not been included within the SA as a reasonable alternative for development. Therefore, the objectivity and parity of the assessment when assigning scores could be questioned.

Table 3: Summary of Site-specific Appraisal of Land at Yieldfields, Bloxwich against the Sustainability Appraisal Objectives

| Sustainability Appraisal Objective | Sustainability Appraisal Score | |
|------------------------------------|---|--|
| | Site Ref. 492a/b/c - Land at Yieldfields, Bloxwich (Barton Willmore Site-specific Appraisal Scoring) | Strategic development location: Land north of Linthouse Lane |
| 1. Climate Change Mitigation | + (minor positive effect) | +/- (impacts uncertain) |
| 2. Climate Change Adaptation | + (minor positive effect) | + (minor positive effect) |
| 3. Biodiversity and Geodiversity | + (minor positive effect) | +/- (impacts uncertain) |
| 4. Landscape | - (minor negative effects) | -- (major negative effect) |
| 5. Pollution and Waste | 0 (no/negligible impacts) | - (minor negative effects) |
| 6. Natural Resources | 0 (no/negligible impacts) | - (minor negative effects) |
| 7. Housing | ++ (major positive effect) | ++ (major positive effect) |
| 8. Health and Wellbeing | ++ (major positive effect) | - (minor negative effects) |
| 9. Cultural Heritage | 0 (no/negligible impacts) | - (minor negative effects) |
| 10. Transport and accessibility | + (minor positive effect) | - (minor negative effects) |
| 11. Education | ++ (major positive effect) | ++ (major positive effect) |
| 12. Economy and Employment | + (minor positive effect) | + (minor positive effect) |

- 5.25 Overall, it is concluded that there are more suitable sites within the Plan area, including Yieldfields, that have not been adequately considered or included for allocation when it is clear from this review that the Local Plan Review should prioritise development in such locations. Based on the above considerations, it is contended that there are no reasons that should preclude the Site from being chosen as a suitable and deliverable strategic housing allocation.

6.0 LAND AT YELDFIELDS FARM, BLOXWICH

Site Description

- 6.1 The Site is located within the Green Belt at the northern edge of Bloxwich, flanking the A34 corridor. The Site falls within two administrative authority boundaries; the southern part of the Site lies within Walsall Borough and the northern part is within South Staffordshire District.

Policy Context

- 6.2 It is important to note that the southern part of the Site within Walsall previously benefitted from a draft housing allocation for 978 homes within the Draft Black Country Plan 2039 (Regulation 18) Consultation document (2021). An extract from Policy WSA4 of the Draft Black Country Plan 2039 is included at **Appendix 2**. Whilst this Plan is now longer being pursued by the Black Country Authorities, the conclusions in respect of the Site remain valid and the Site is a sustainable location for development.
- 6.3 In this regard, it should be noted that Walsall Council has already commenced work regarding the preparation of a stand-alone local plan a view to consulting on an Issues and Options document in September 2023. It is therefore considered likely that the southern section of the Site will remain allocated for development through the emerging Walsall Local Plan.

Proposed Development

- 6.4 The Concept Masterplan covers the whole site (i.e. land within South Staffordshire and Walsall) and demonstrates that the Site could deliver up to a total of 1,900 new homes, alongside the provision of two primary schools, local services and facilities as well as significant open space. In addition, this masterplan would deliver new green infrastructure together with ecological improvements and benefits. Again, this is important in the context of Paragraph 142 of the NPPF, which advises that plans should set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.

Transport and Accessibility

- 6.5 The Site benefits from a sustainable location with good access to surrounding modes of transport. Bloxwich North railway station, which provides services between Birmingham New Street and Rugeley Trent Valley, is located approximately 1.8km to the west and is accessible from the Site by walking, cycling and public transport. Bloxwich North railway station is located along the Chase Line which was recently subject to major improvement works including electrification to enable faster and more frequent services. In addition, the nearest existing bus stop to the Site is located approximately 650m to the west on Turnberry Road. Further bus stops are located approximately 750m to the south of the Site outside Bloxwich golf club and

approximately 950m to the north of the Site opposite the New Masons. These bus stops are serviced by the X51, 1 and 74 bus services which provide direct links to Walsall, Stafford, Cannock and Birmingham. The draft allocation of the southern section of the Site located in Walsall within the draft Black Country Plan 2039 (Policy WSA4) will provide the opportunity to enhance these bus services and provide bus stops closer to the Site, particularly the northern section of the Site located in South Staffordshire. The Site's good public transport links are also important in the context of Paragraph 142 of the NPPF, which identifies that where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land that is well served by public transport.

- 6.6 The Transport Technical Note (October 2021) prepared by Pell Frischmann (included at **Appendix 8**) also concludes that the potential traffic impact of the proposals should not be a barrier to the proposed allocation of the Site. Suitable mitigation measures will be identified and developed should any junctions require improvement.
- 6.7 As such, it is considered that the Site is a sustainable location, close to existing public transport, where there is capacity to deliver a significant amount of housing to meet the identified need. This is significant in the context of Paragraph 142 of the NPPF in terms of prioritising land that is well served by public transport, where it has been concluded that it is necessary to release Green Belt land for development.

Green Belt

- 6.8 The Site comprises land that currently lies within the Green Belt. L&Q Estates nonetheless considers that the Site is a suitable and deliverable site that could be released from the Green Belt to deliver a sustainable large extension to the urban area of Bloxwich. The Site is available and covers approximately 122 hectares of land, comprising a series of parcels of land, all in one ownership, between Landywood and Bloxwich, with the Stafford Road (A34) running through the middle (as shown in **Appendix 1**).
- 6.9 Barton Willmore's Landscape Team have assessed the Site and have previously undertaken a Landscape and Visual and Green Belt Appraisal (LVGBA) (**Appendix 6**). This Assessment considers that the Site makes only a limited contribution to the purposes of the Green Belt. The existing extents of built form along the A34 corridor towards settlements to the north have created a situation in which the urban area of Bloxwich has sprawled and there is potential for merging of towns. However, a shallow ridgeline on the northern edge of the Site provides the basis for reinforcement through green infrastructure provision to create physical features that are readily recognisable and likely to be permanent.
- 6.10 Yieldfields will deliver significant improvements to the quality and accessibility of the existing Green Belt. These improvements will include the creation of a landscape buffer and soft edge/transition along the development edge/perimeter of the new development to soften the

visual impact on the surrounding countryside, thus providing a clearly defined and defensible Green Belt boundary. In addition, the development will retain and enhance existing mature tree belts and hedges, responding to the local countryside character to the north. In terms of connectivity, Yieldfields will include a network of green links, streets and spaces which will provide new pedestrian and cycle routes from the development to existing Public Rights of Way, improving access to the remaining Green Belt.

Landscape and Visual Impact

- 6.11 There is potential for sensitive development of the Site within the topographical containment provided by the shallow ridgeline extending through the northern part of the site; within the existing extent of development along the A34 north of Bloxwich; and avoiding development of the land in the eastern edge of the Site which is less subject to urbanising influences than those areas nearer the A34. The Concept Masterplan (**Appendix 3**) sets out to create a landscape buffer and soft edge/transition along the perimeter/edge of the new development to soften the visual impact on the surrounding countryside, thus providing a clearly defined and defensible Green Belt boundary in accordance with South Staffordshire's proposed development strategy (Strategic Objective 1). In addition, the Site would also provide a network of green links, streets and spaces which will provide pedestrian and cycle routes to public rights of way, improving access to the remaining Green Belt.

Deliverability

- 6.12 Therefore, L&Q Estates consider that the Site is a suitable and deliverable site that could be released from the Green Belt to deliver a sustainable extension to the urban area of Bloxwich. This would be in accordance with the aims of the NPPF and would also significantly assist in meeting the housing need of the Council and the unmet needs of the GBBCHMA.
- 6.13 We consider that Yieldfields should comprise a strategic allocation and, as such, should be included in Draft Policy DS5 (the Spatial Strategy to 2039) and in the Strategic Allocation policies (SA1-SA4). Barton Willmore's site-specific appraisal of the Site against the SA objectives (included at **Appendix 7**) demonstrates that the Site represents a justifiable location for future residential-led development, which proposes approximately up to 900 homes within South Staffordshire and, as shown on the Concept Masterplan, a primary school, varied public open space and recreational facilities and allotments. We consider that the Site scores well against the 12 SA objectives. Indeed, we consider that Yieldfields scores considerably better (more positively) than Policy SA3: Strategic development location: Land north of Linthouse Lane (Site 486c) which has been identified as a strategic housing allocation in the Publication Consultation document.
- 6.14 Whilst Yieldfields benefits from a sustainable location, with the nearest bus stop located 650m from the Site, and the closest rail station located 1.8km from the Site. It is considered that

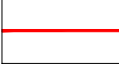
Land north of Linthouse Lane does not have the benefit of being within close proximity to a railway station, with the nearest being Bloxwich North, located over 5km to the east. Therefore, new residents of the Land north of Linthouse Lane development would likely rely heavily on private car use for means of transport to access employment and community facilities, increasing emissions and effects on climate change and health.

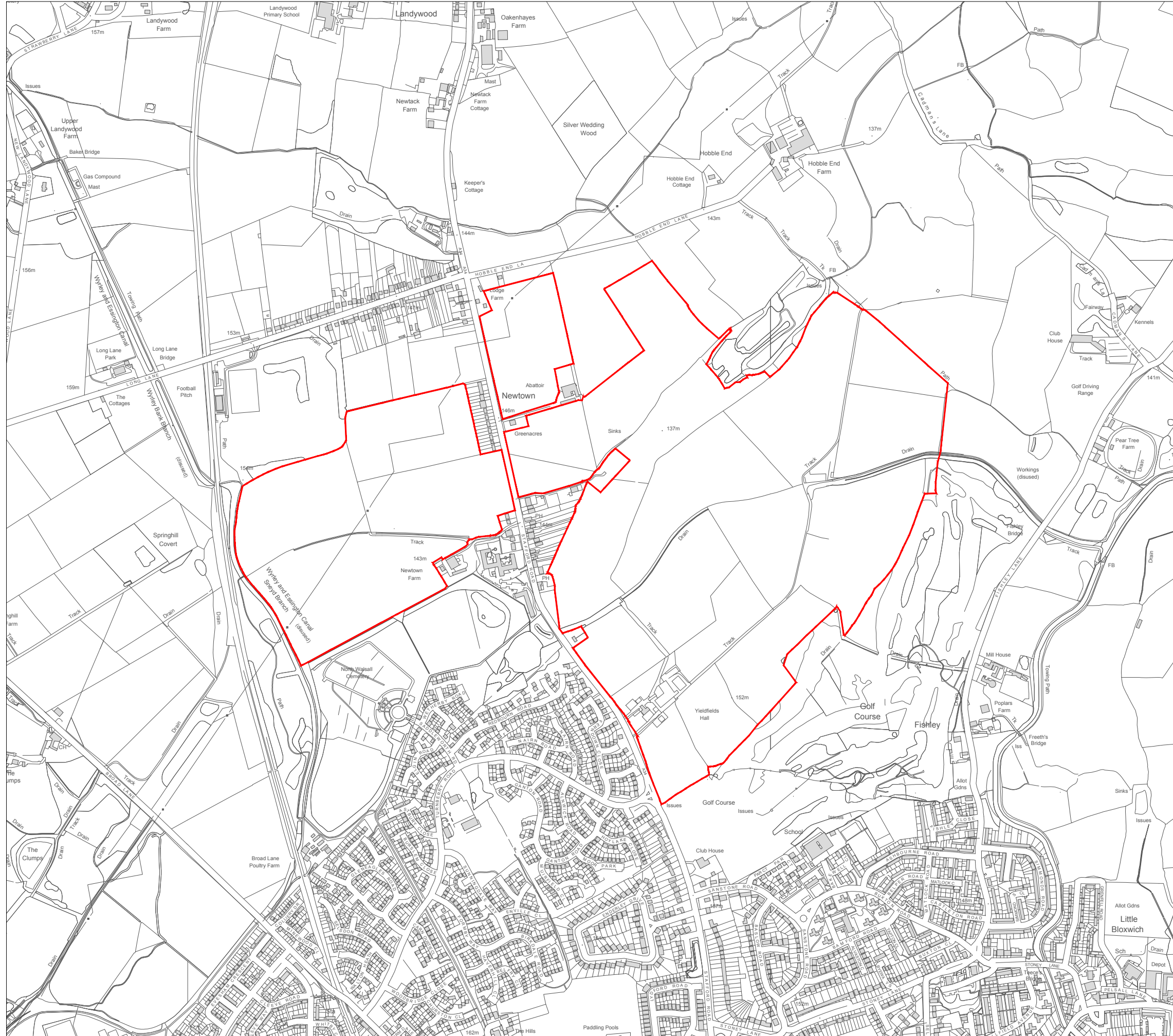
- 6.15 Furthermore, Land north of Linthouse Lane is relatively isolated in terms of existing green spaces, and it is unclear how any proposed green infrastructure would link with existing networks to create meaningful corridors and connections for the benefit of biodiversity habitats as well as human health and wellbeing. In contrast, Yieldfields has the potential to retain and enhance elements of the landscape, green infrastructure network and pedestrian and cycling routes in the existing and new community, providing benefits in relation to several objectives, including climate change mitigation and adaptation, biodiversity, health and wellbeing and economy and employment. Enhancement of the green infrastructure network will also provide benefit to the local Green Belt, by further supporting barriers to urban sprawl, and biodiversity features onsite through the provision of enhanced habitat and foraging provision.
- 6.16 Further afield, statutory and non-statutory ecological designations outside of the site footprint are not expected to be adversely affected by the future development due to their distance from site, and intervening development. The Site presents the opportunity to contribute to green corridors in the area, linking up networks of green spaces, including the canal corridor to the west.
- 6.17 In light of the above, it is maintained that Yieldfields scores better against the SA Objectives than the proposed strategic development at Land north of Linthouse Lane (as set out in Table 1.1 in Section 7 above). It is, therefore, unclear why Yieldfields has not been adequately considered or included for allocation when it is clear that the Local Plan Review should prioritise development in such a location. Based on the above considerations, it is contended that there are no reasons that should preclude the Site from being chosen as a suitable and deliverable strategic housing allocation within the emerging South Staffordshire Local Plan.

APPENDIX 1
Site Boundary Plan (Drawing RG-M-30)

The scaling of this drawing cannot be assured

Revision _____ Date _____ Drn _____ Ckd _____

 Site Boundary
122.78Ha / 303.39Ac



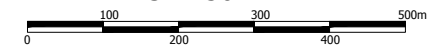
Project
**LAND AT YELDFIELDS FARM,
BLOXWICH**

Drawing Title
SITE BOUNDARY PLAN



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

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



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APPENDIX 2

Extract from Draft Policy WSA4 of the Draft Black Country Plan 2039

Bloxwich East

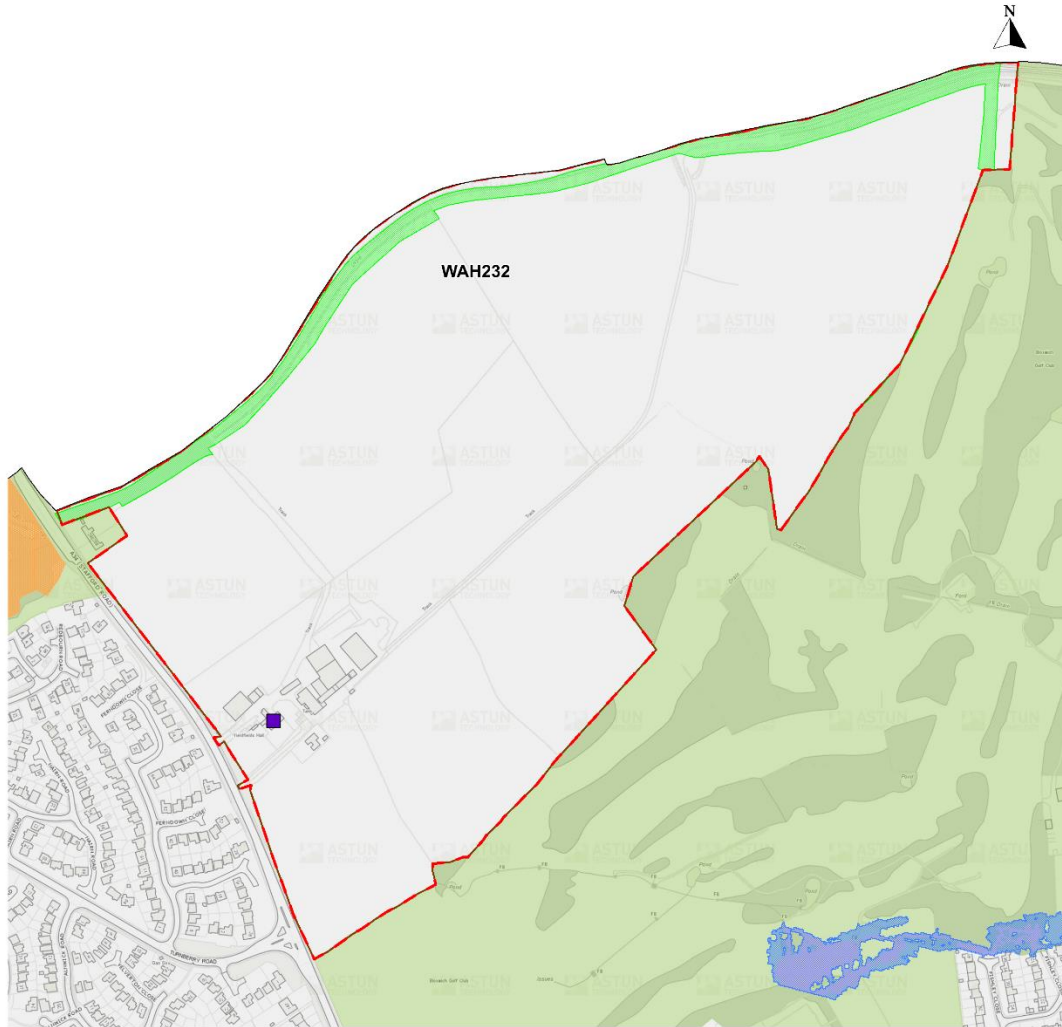
Policy WSA4 – Yieldsfield Farm (sometimes recorded as Yieldfields farm), Stafford Road, Bloxwich

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

STRATEGIC ALLOCATION WSA.4



Walsall Council



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

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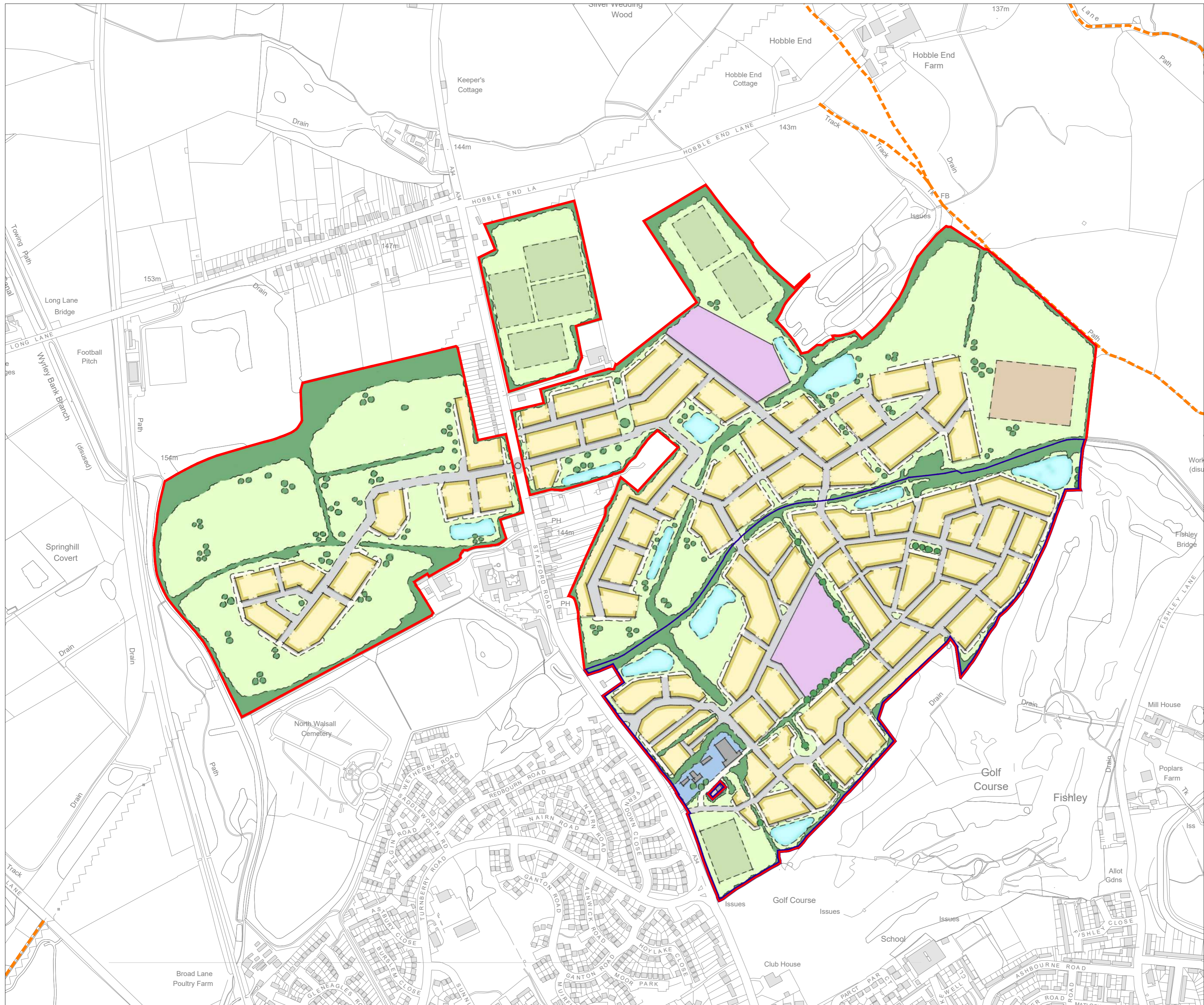
General introduction

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

Design principles:

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

APPENDIX 3
Illustrative Concept Masterplan (Drawing BM-M-14C)



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| Revision | Date | Drn | Ckd |
|----------|----------|-----|-----|
| C | 06.12.21 | SM | LH |

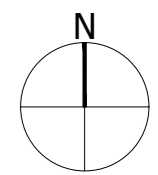

- Site boundary
- Land falling within Draft Allocation WSA4 in the Draft Black Country Plan
- Proposed residential development
- Proposed infrastructure
- Proposed school
- Proposed community hub
- Proposed attenuation
- Proposed public open space (incl. parks, play spaces and sports pitches)
- Retained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

Project
Land at Yieldfields Farm, Bloxwich

Drawing Title
Illustrative Concept Masterplan

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

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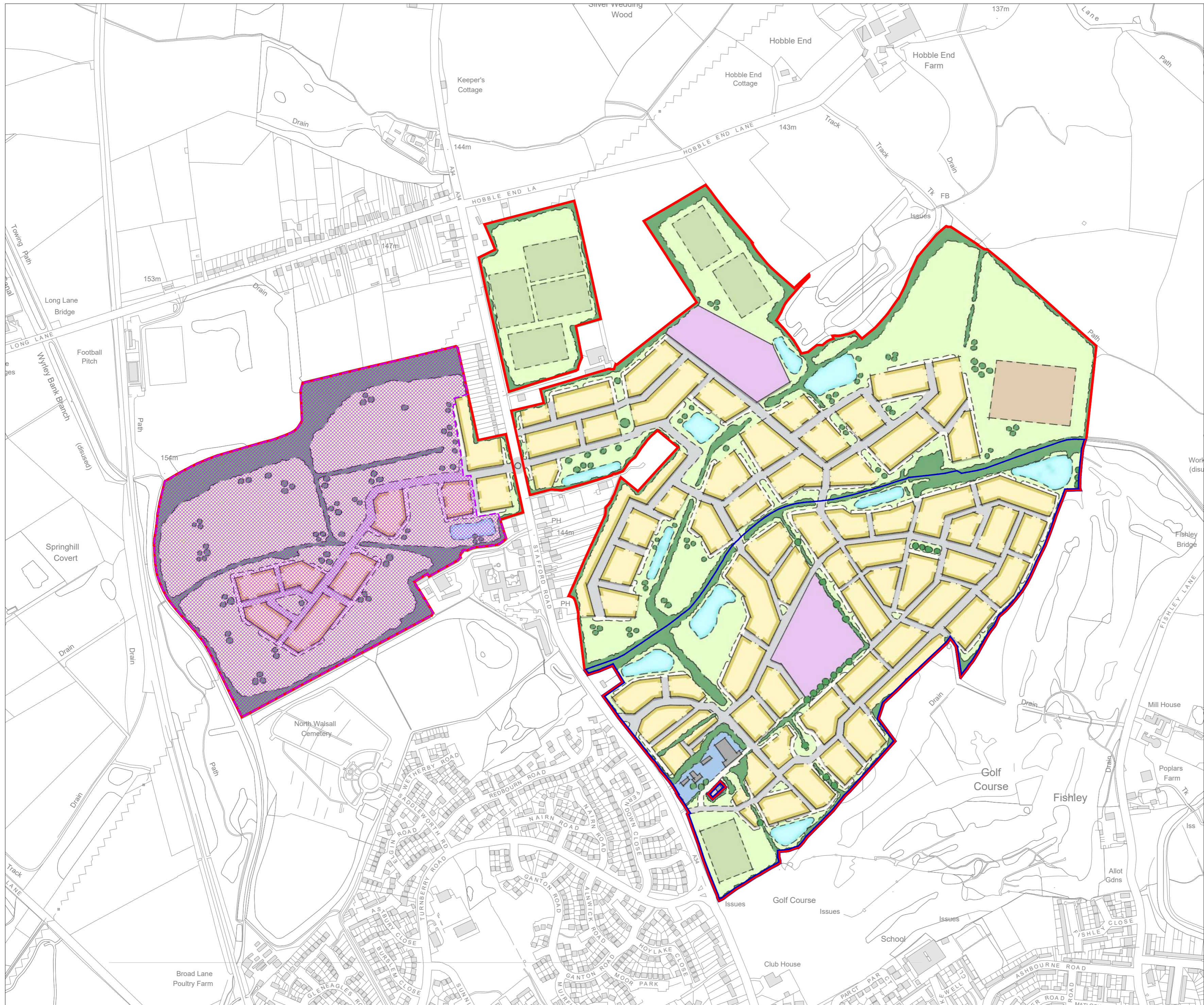
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APPENDIX 4

Illustrative Concept Masterplan with Phasing (Drawing BM-M-15A)

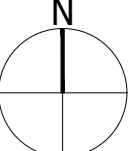



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| Revision | Date | Drn | Ckd |
|----------|----------|-----|-----|
| A | 06.12.21 | SM | LH |

— Site boundary
— Land falling within Draft Allocation WSA4 in the Draft Black Country Plan
 Final / further phase of development

Project
Land at Yieldfields Farm, Bloxwich
 Drawing Title
Illustrative Concept Masterplan Phasing
 Date
 02.12.21
 Scale
 1:5,000 @ A2
 Drawn by
 SM
 Check by
 LH
 Project No
 26036
 Drawing No
 BM-M-15
 Revision
 A

North Arrow

 Scale Bar


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APPENDIX 5
Green Belt Advice Note (November 2019)

Yieldfields Farm, Bloxwich: Green Belt Advice Note

Prepared on behalf of L & Q Estates

December 2019

1. This advice note represents Barton Willmore's summary of, and commentary on, the findings of the South Staffordshire Green Belt Study (SSGBS)¹ in relation to the site at Yieldfields Farm, Bloxwich (the 'Site').
2. The SSGBS was prepared in July 2019 as part of the Spatial Housing Strategy and Infrastructure Delivery Consultation and presents the Stage 1 and Stage 2 findings of the Green Belt Study for South Staffordshire District. A separate report (currently unavailable) will set out the Stage 1 and 2 findings for the Black Country, including Walsall Borough.
3. The northern and western areas of the Site fall within South Staffordshire District, whilst areas to the south fall within Walsall Borough. Therefore, the Stage 1 and 2 Green Belt Study is only currently available for northern and western parts of the Site.
4. The aims of this advice note are to:
 - provide a summary of the findings of the SSGBS in relation to the Site; and
 - provide a commentary on the findings, with regard to:
 - o the anticipated harm of releasing the Site from the Green Belt, in the context of the levels of harm reported at Stage 2 of the Green Belt Study (i.e. very high);
 - o the size and appropriateness of the parcels assessed within the SSGBS; and
 - o the need for a joined-up approach to releasing land across South Staffordshire District and Walsall Borough.
5. The advice note should be read alongside the Barton Willmore Landscape, Visual and Green Belt Appraisal (BW LVGBA), which updates earlier iterations undertaken in 2016 and 2018.
6. The advice note is supported by **Appendix A: Relevant SSGBS Extracts.**

¹ LUC (2019) South Staffordshire Green Belt Study

SSGBS – Summary and Commentary

7. The Green Belt Study for South Staffordshire was undertaken in two stages - Stage 1 considered the 'contribution' of strategic parcels of land to the purposes of the Green Belt (as defined in the NPPF); and Stage 2 assessed the harm to the Green Belt that would result from the release of specific sites or parcels of land.

Stage 1 findings

8. The Green Belt contribution ratings for Stage 1 are on a three point scale:

Strong Contribution;
Moderate Contribution; and
Weak/No Contribution.

9. The northern and western parts of the Site (i.e. the areas located within South Staffordshire District) are identified as falling almost entirely within Stage 1 'Parcel S16', albeit with a small area to the east falling within 'Parcel S15'. Areas lying immediately to the south of Parcel S16 fall within the Black Country (Walsall Borough) and as such will be considered within the separate Black Country report (not yet available).
10. Parcel S15 and S16 are assessed (Table 5.1, page 40) as making a Strong contribution to purposes 1, 2 and 3 and a Weak/No contribution to purpose 4. Further detail is provided on the individual parcel scores in Appendix 2 of the study.

Purpose 1: Checking the unrestricted sprawl of large built-up areas

11. With regard to Purpose 1, the assessment text for Parcel S16 (Appendix 2, page 127) states that "*[the] land is adjacent or close to the large built-up area, contains very limited urban development, and has strong openness. It retains a relatively strong relationship with the wider countryside*". A near identical description is provided for Parcel S15 (Appendix 2, page 125).
12. Further discussion on Purpose 1 in relation to the Site and surrounding area is provided in the main report (page 42), which states *that "land in the narrow gap between the West Midlands Conurbation and the Cannock/ Hednesford/ Cheslyn Hay/ Great Wyrley large built-up area makes a strong contribution."*

13. The BW LVGBA disagrees with the findings of the SSGBS with regard to the Site's contribution to Purpose 1. Overall, whilst the Site is currently open, it is partly contiguous with the edge of the existing urban area of Bloxwich, in the form of the ribbon development extensions north along the A34 that constitute sprawl; and provides some additional barrier to the built up area beyond the existing boundary features. Due to the extent of the existing ribbon development along the A34, the Site does not check the unrestricted sprawl of the existing settlement pattern, which has taken place along the roadway corridor.
14. The Site is partly contained by robust physical features. The reinforcement of the low ridge-line on the northern edge of the Site with appropriate structural landscaping, along with the presence of Long Lane/Hobble End Lane, has potential to form a defensible and permanent boundary. Development within the Site would therefore extend the settlement pattern in a coherent manner, and as such it is considered that the Site makes Some contribution to Purpose 1 overall in the BW LVGBA.
15. Based on the SSGBS methodology (page 35) it is considered that the Site would make a Moderate contribution to Purpose 1, owing to the presence of the A34 and associated ribbon development, albeit retaining openness.

Purpose 2: Preventing the merging of neighbouring towns

16. With regard to Purpose 2, the assessment text for Parcel S16 (Appendix 2, page 127) states that ***"[the] land forms a narrow gap between the towns of Great Wyrley and Bloxwich, essential to maintaining a sense of separation between them"***. This is also stated in the assessment for Parcel S15 (Appendix 2, page 125), albeit the gap between Bloxwich and Great Wyrley is described within this parcel as "substantial" (Appendix 2, page 127).
17. In relation to the Site and surrounding area the main report states (page 46) ***"Only 1.5km separate Bloxwich from Landywood, at the southern end of Great Wyrley. Inset development on Long Lane and the A34 Walsall Road, and washed over but urbanising development along the A34 near Bloxwich, reduce perceived separation. There are no significant separating physical features and the A34 and railway provide direct transport links. This gap between towns is therefore considered fragile, and no land within it is sufficiently urbanised to make less than a strong contribution to Purpose 2. Land peripheral to the core gap makes a moderate contribution"***.

18. The BW LVGBA disagrees with the findings of the SSGBS in regard to the contribution to Purpose 2. The existing ribbon development along the A34 demonstrates the extent to which the urban area of Bloxwich has already extended northwards towards the nearby settlement of Landywood/Great Wyrley and the development inset from the Green Belt on Long Lane. In this context, whilst the physical distance between the two urban areas would be reduced by built development in the eastern parts of the Site, it is only the northern edge of the Site that directly contributes to the prevention of settlement outside the Green Belt from merging (i.e. in the area to the north of Newtown and the abattoir to the east of the A34). The existing built development along the A34, along with the infrastructural influence of the road itself, also strongly influences the character of the Site resulting in an urbanising influence, as acknowledged in the SSGBS (paragraph 5.17). As such the Site is assessed as making only Limited-Some contribution to Purpose 1 in the BW LVGBA.
19. Furthermore, when considered as a whole (i.e. along with the land in Walsall Borough), the Site for the most part could be considered to be peripheral to the core gap as it would be contiguous with the urban edge of Bloxwich and would extend no further north than the existing near-continuous development along the A34 corridor. As such, based on the SSGBS methodology (page 36) it is considered that the Site would make a Moderate-Weak contribution to Purpose 2.

Purpose 3: Safeguarding the countryside from encroachment

20. In regard to Purpose 3, the assessment text for Parcel S16 (Appendix 2, page 127) states that "*[the] land contains the characteristics of open countryside (i.e. an absence of built or otherwise urbanising uses in Green Belt terms) and does not have a stronger relationship with the urban area than with the wider countryside*". An identical description is provided for Parcel S15 (Appendix 2, page 125).
21. No specific mention is made in relation the Site or surrounding area in regard to Purpose 3 within the main report, although it is stated (on page 49) that "*the vast majority of land in South Staffordshire makes a strong contribution to preventing encroachment on the countryside...*" and that only certain areas are considered to make a weaker contribution due to "*...loss or [sic] openness or containment by urbanising influences*".
22. Whilst much of the assessment for purpose 3 in is agreement with the BW LVGBA, the overall level of contribution is not. It is accepted that there are only limited built forms within the Site (including Yieldfields Farm and the abattoir) and that it is in agricultural land use,

meaning the area is broadly considered to assist in safeguarding the countryside from encroachment. However, crucially the existing settlement pattern of Bloxwich already extends north along the A34 corridor and the influence of this is clearly evident across the adjoining landscape within the Site, which results in a sense of existing physical and perceptual encroachment. As such, development within the Site would result in a moderate urbanising influence only and the Site is considered to make only Some contribution to Purpose 3 within the BW LVGBA.

23. In addition, considering the presence of inset development on Long Lane, with the Site lying between this and the urban edge of Bloxwich to the south; and the partial containment provided to the north by Long Lane/Hobble End Lane and a low ridgeline on the northern edge of the Site (which has potential to form a boundary of permanence), it is considered that the Site has a strong relationship with urban edge of Bloxwich. This is particularly the case when the Site is considered as a consolidated whole, including the land within Walsall Borough that is contiguous with the urban edge of Bloxwich, rather than as an isolated parcel as it has been in the SSGBS (inevitably, owing to the separate Green Belt assessment of South Staffordshire and Walsall). As such, based on the SSGBS methodology (page 37-38) it is considered that the Site would make a Moderate contribution to Purpose 3.

Purpose 4: Preserve the setting and special character of historic towns

24. In regard to Purpose 4 the assessment text for Parcel S16 (Appendix 2, page 127) states ***"Land does not contribute to the setting or special character of a historic town"***. An identical description is provided for Parcel S15 (Appendix 2, page 125).
25. This aligns with the findings of the BW LVGBA, which assessed the Site as making No contribution to Purpose 4. The Site is separated from the acknowledged historic centre of Bloxwich (as included within the designated Conservation Area) by extensive urban development. As such, the Site, formed of relatively low-lying land, separated from the historic centre in physical, visual and character terms, makes no contribution to the setting and special character of this area of historic settlement.

Stage 2 findings

26. The Green Belt harm ratings for Stage 2 are on a seven point scale:
- Very High harm;
 - High harm;

- Moderate-High harm;
 - Moderate harm;
 - Low-Moderate harm;
 - Low harm; and
 - Very low harm.
27. Stage 2 'Sub-Parcel S16C – Newtown' covers the majority of the Site and a small part of 'Sub-Parcel S15A – Cadman's Lane' is consistent with the eastern part of the Site. Promoted sites 492a, 492b and 492c also fall within the Site, as shown on Figure 7.1a of the SSGBS (page 77). The land immediately adjacent to the south of Sub-Parcel S16C lies within Walsall Borough and as such will be considered within the separate Black Country report (not yet available).
28. The detailed findings of the assessment of harm are included in Appendix 3 of the SSGBS and are summarised in the main report by sub-parcel (Table 7.1, page 66) and by site (Table 7.2, page 73). Sub-Parcel S16C and S15A and the three promoted sites (492a, 492b and 492c) are all assessed as having a Very High harm rating.
29. Sub-Parcel S16C is described (Appendix C, page 350) as ***"Farmland and washed-over housing development on the northern edge of Bloxwich, bisected north-south by Stafford Road and bound to the west by the Wyrley and Essington Canal"***. Sub-Parcel S15A is described (Appendix 3, page 338) as ***"Farmland and golf driving range lying in the open countryside between Bloxwich/Pelsall and Great Wyrley (Can-nock)"***.
30. In relation to the assessment of harm on Sub-Parcel S16C, page 351 of Appendix 3 states that ***"the sub-parcel makes a strong contribution to preventing sprawl of the West Midlands conurbation at Bloxwich, to maintaining the separation between the neighbouring towns of Bloxwich and Great Wyrley, and to preventing encroachment on the countryside. The sub-parcel is close to but not adjacent to the settlement edge, has a strong relationship to the open countryside, and could only form an urban extension of the urban edge of Bloxwich if released in conjunction with neighbouring sub-parcel S17A and some of the land to the south lying within the neighbouring Black Country authority. However releasing land in this sub-parcel would significantly weaken the integrity of surrounding Green Belt land by narrowing the fragile gap between neighbouring towns and containing existing areas of Green Belt to the southeast and southwest of the sub-parcel"***.

31. A similar description of harm is provided for Sub-Parcel S15A (Appendix 3, page 339), albeit the sub-parcel is described as being "***...surrounded by open countryside on all sides... and as having "... strong spatial openness"***". In regard to release of land as an extension of the settlement, it is stated that this "***...would significantly weaken the integrity of surrounding areas of Green Belt by significantly expanding the urban edge into the countryside, and threatening the fragile gap between the West Midlands conurbation and the Cannock built up area"***".
32. The Very High level of harm reported for Sub-Parcels S15A and S16C is due to the fact that releasing these sub-parcels is anticipated to "***significantly weaken***" the integrity of surrounding Green Belt due to a "***expanding the urban edge into the countryside***" and "***narrowing the fragile gap between neighbouring towns***". However, as noted above the existing ribbon development along the A34 demonstrates the extent to which the urban area of Bloxwich has already extended northwards towards the nearby settlement of Landywood/Great Wyrley and the inset development on Long Lane. Considering the presence of this existing development, it is only the northern edge of the Site (i.e. in the area to the north of Newtown and the abattoir to the east of the A34) that directly contributes to the prevention of neighbouring towns merging.
33. Furthermore, considering the Site's location between the inset development on Long Lane to the north and the urban edge of Bloxwich to the south; and the partial containment provided by Long Lane/Hobble End Lane and a low ridgeline on the Site's northern edge, the Site has a strong relationship with urban edge of Bloxwich, rather than solely to the open countryside as suggested in the SSGBS. This is particularly the case when the Site is considered as a consolidated whole in conjunction with land in Walsall Borough to the south, rather than as individual parcels isolated from the existing urban edge as it has been in the SSGBS (see below).
34. The presence of existing built development along the A34, along with the road itself, strongly influences the character of the Site, resulting in an urbanising influence (acknowledged for strategic parcel 16 in Stage 1 of the SSGBS), and a sense of existing physical and perceptual encroachment across the adjoining landscape within the Site. As such, it is considered that development within the Site would have only a moderate urbanising influence over the wider landscape. The partial containment provided by Long Lane/Hobble End Lane and a low ridgeline on the northern edge of the Site (which has potential to form a permanent and robust boundary), would also help reduce any influence on the remaining Green Belt land to the north, including any sense of sprawl or encroachment; and would help maintain a sense of

separation between the inset development on Long Lane and Landywood/Great Wyrley to the north.

35. As noted above, Sub-Parcel A15A and S16C have been considered as individual parcels, isolated from the urban edge of Bloxwich. However, if considered as a consolidated whole in conjunction with the immediately adjacent land to the south (i.e. land falling within Walsall Borough and Sub-Parcel S17A), as acknowledged within the SSGBS, then the combined area would be contiguous with the edge of Bloxwich to the south, resulting in a stronger spatial relationship with the existing urban area. With the Green Belt Study for the Black Country not yet available, this highlights the need for a joined-up approach to releasing land across South Staffordshire District and Walsall Borough, irrespective of which administrative boundary a parcel of land falls within.
36. The differing conclusions between the SSGBS and the BW LVGBA is largely a result of the fact that latter has considered the Site as a consolidated whole, incorporating the land within both South Staffordshire District and Walsall Borough, whilst the former has considered individual sub-parcels of land (i.e. S15B and S16C) within South Staffordshire isolated from the urban edge of Bloxwich. Furthermore, it should be noted that the BW appraisal work has been undertaken a more refined scale and is based on an extensive landscape and visual survey and baseline analysis specific to the Site.

Summary

37. As outlined above, within the BW LVGBA it is considered that the Site, when considered as a consolidated whole in conjunction with land within Walsall Borough, makes Some contribution to Purpose 1, a limited-Some contribution to Purpose 2 and Some contribution to Purpose 3. This differs from the 'Strong' contribution reported for Purposes 1, 2 and 3 in Stage 1 of the SSGBS for strategic parcels S15 and S16. The differing conclusions between the BW LVGBA and the SSGBS are largely a result of the fact that former has considered the Site as a consolidated whole, incorporating the land within both South Staffordshire District and Walsall Borough, whilst the latter has only considered individual sub-parcels of land (i.e. S15B and S16C) within South Staffordshire that are isolated from the urban edge of Bloxwich.
38. Considering the Site as a consolidated whole in this way, it is considered that development of the Site, in accordance with the key landscape and visual opportunities and constraints outlined within the BW LVGBA, would result in lower levels of potential harm to the Green Belt than is reported within the SSGBS and would not significantly weaken the integrity of surrounding Green Belt.

APPENDIX A

APPENDIX A: RELEVANT SSGBS EXTRACTS

**SOUTH STAFFORDSHIRE GREEN BELT STUDY: STAGE 1 AND
2 REPORT**



www.landuse.co.uk

South Staffordshire Green Belt Study

Stage 1 and 2 Report
Prepared by LUC
July 2019



4 Stage 1 Methodology

Introduction

- 4.1 The following chapter sets out the methodology for the Stage 1 Green Belt Assessment. The primary aim of the Stage 1 assessment was to establish the variation in the contribution of land to achieving the Green Belt purposes as defined by the NPPF. Based on the assessment criteria outlined below, a strategic review of the contribution of all Green Belt land within the Council areas to each of the five Green Belt purposes was undertaken. This drew out spatial variations in the contribution of Green Belt land to each Green Belt purpose.

Strategic Assessment Process

- 4.2 Prior to any detailed assessment work, an initial visit was made to the area, to gain an overview of the spatial relationships between the settlements and the countryside in South Staffordshire.
- 4.3 The first main step then involved identifying any Green Belt locations where sufficient urbanising development has occurred which has had a significant impact on Green Belt openness (as defined in **Chapter 3** above). Distinctions were made between development which is rural enough in character, or small enough in size, or low enough in density, not to affect to its designation as Green Belt.
- 4.4 The second step assessed the fragility of gaps between the settlements identified in **Chapter 3** as 'towns' under Green Belt Purpose 2.
- 4.5 The assessment then proceeded on a settlement by settlement basis, starting with the largest areas of development – i.e. in the first instance the Wolverhampton-Walsall conurbation – through to the smaller inset⁴³ villages. If any significant areas of washed-over⁴⁴ urbanising development were identified in the initial stage, these too formed a focus for analysis. Recognising the common factors that influence the role of Green Belt land in the relationship between urban settlement and countryside (as described in **Paragraph 4.3** above), the analysis:
- assessed the strength of relationship between the Green Belt and the urban area, considering the extent and form of development, land use characteristics and separating and connecting features;
 - identified changes in the strength of relationship between settlement and countryside, again considering the extent and form of development, land use characteristics and separating and connecting features; and
 - considered how these spatial relationships affect contribution to each of the Green Belt purposes, and mapped lines to mark these changes.
- 4.6 The analysis progressed outwards from each settlement until it was determined that land:
- ceases to play a significant role in preventing sprawl of a large built-up area;
 - either makes a consistent contribution to settlement separation, or makes no contribution to this purpose;
 - is strongly distinct from urban settlement and has a strong relationship with the wider countryside; and
 - makes no contribution to the setting or special character of a historic town.

⁴³ 'Inset' development is development that is surrounded by Green Belt land but is not itself located within the Green Belt designation.

⁴⁴ Development 'washed-over' by the Green Belt is development that is located within the Green Belt designation.

Criteria for Assessment of Green Belt Contribution

- 4.7 To draw out clear variations in contribution to each Green Belt purpose the three point scale set out in **Table 4.1** was used.

Table 4.1: Green Belt Contribution Ratings

| | |
|------------------------------|--|
| Strong Contribution | Green Belt performs well against the purpose. |
| Moderate Contribution | Green Belt performs moderately well against the purpose. |
| Weak/No Contribution | Green Belt makes weak or no contribution to the purpose. |

Purpose 1 Assessment Criteria

- 4.8 The role land plays in preventing sprawl is dependent on the extent of existing development that has occurred and its relationship with existing large built-up area(s). **Figure 3.1** indicates which settlements lie within large built-up areas. All of the development forms noted in the RTPi note (see **para 3.17**) have been considered when judging the extent to which sprawl has already occurred. Assumptions about the extent and form of future development which have not been permitted cannot be made. Sprawl includes any built structure that has an impact on openness and/or has an urbanising influence. It does not include development which is classed as appropriate development, or not inappropriate development in the Green Belt (as defined in paras 143-147 of the NPPF⁴⁵).
- 4.9 To contribute to Purpose 1, land must lie adjacent to, or in close proximity to, a large built-up area, and must retain a degree of openness that distinguishes it from the urban area. Land that has a stronger relationship with a large built-up area than with open land, whether due to the presence of, or containment by, existing development, the dominance of adjacent urban development or the strength of physical separation from the wider countryside, makes a weaker contribution to this purpose. Vice versa, land which is adjacent to the urban edge but which, as a result of its openness and relationship with countryside, is distinct from it makes a stronger contribution.
- 4.10 Land which is more clearly associated with a settlement that is not a large built-up area can be considered to make no direct contribution to Purpose 1.
- 4.11 In summary, key questions asked in assessing Purpose 1, the prevention of sprawl of large, built-up areas, include:
- Does the land lie in, adjacent to, or in close proximity to the large built-up area?
 - To what extent is the land open or does it contain existing urban development?
 - Does the land relate sufficiently to a large built-up area for development within it to be associated with that settlement or vice versa?
 - Does land have a strong enough relationship with the large built-up area, and a weak enough relationship with other Green Belt land, for development to be regarded more as infill than sprawl?
 - What is the degree of containment by existing built development or other features (e.g. by landform)?

⁴⁵ This is set out in case law where the Court of Appeal addressed the proper interpretation of Green Belt policy in R (Lee Valley Regional Park Authority) v Epping Forest DC [2016] EWCA Civ 404. Applying the findings of this case, appropriate development in the Green Belt cannot be contrary to either the first or third Green Belt purpose and should be excluded from the assessments as 'urbanising features' as it is cannot be "urban sprawl" and cannot have an "urbanising influence".

4.12 **Table 4.2** summarises the criteria that were used for the assessment of Purpose 1.

Table 4.2: Purpose 1 assessment criteria

| Purpose 1: Check the unrestricted sprawl of large built-up areas | |
|---|--|
| <p>Development/land-use: where there is less existing development, the Green Belt makes a stronger contribution.</p> <p>Location: land closer to the large, built-up area generally makes a stronger contribution.</p> <p>Separating features: land that has a stronger relationship with the countryside than the large built-up area makes a stronger contribution.</p> <p>Connecting features: where there are no connecting features between the large built-up area and the countryside, land makes a stronger contribution.</p> | |
| Strong Contribution | Land adjacent or close to the large built-up area that contains no or very limited urban development and has strong openness. It retains a relatively strong relationship with the wider countryside. |
| Moderate Contribution | Land adjacent or close to the large built-up area that contains some urban development and/or is to an extent contained by urban development, but retains openness and some relationship with the wider countryside. |
| Weak/No Contribution | <p>Land adjacent or close to the large built-up area that is already fully urbanised; or</p> <p>land that is too contained by development to have any relationship with the wider countryside; or</p> <p>land that is sufficiently separated or distant from a large built-up area for there to be no significant potential for urban sprawl from the large built-up area.</p> |

Purpose 2 assessment criteria

- 4.13 The role land plays in preventing the merging of towns is more than a product of the size of the gap between towns. The assessment considered both the physical and visual role that Green Belt land plays in preventing the merging of settlements. This approach accords with PAS guidance which states that distance alone should not be used to assess the extent to which the Green Belt prevents neighbouring towns from merging into one another. Settlements identified as towns are listed in **Table 3.1** and indicated on **Figure 3.2**.
- 4.14 Land that is juxtaposed between towns makes a contribution to this purpose, and the stronger the relationship between the towns – the more fragile the gap – the stronger the contribution of any intervening open land. Physical proximity was the initial consideration, but land that lacks a strong sense of openness, due to the extent of existing development that has occurred, makes a weaker contribution. This includes land that has a stronger relationship with an urban area than with countryside, due to extent of containment by development, dominance of development within an adjacent inset area, or containment by physical landscape elements. However, where settlements are very close, a judgement was made as to whether their proximity is such that the remaining open land does not play a critical role in maintaining a distinction between the two towns, i.e. the characteristics of the open land relate more to the urban areas themselves than to the open land in between. Where this is the case, the contribution to Purpose 2 may be reduced.
- 4.15 Both built and natural landscape elements can act to either decrease or increase perceived separation, for example intervisibility, a direct connecting road or rail link or a shared landform may decrease perceived separation, whereas a separating feature such as a woodland block or hill may increase the perception of separation. Smaller inset settlements also reduce the amount of countryside between towns, particularly as perceived from connecting roads.

- 4.16 In summary, key questions asked in assessing Purpose 2, preventing the coalescence of towns, include:
- Does the land lie directly between two settlements being considered under Purpose 2?
 - How far apart are the towns being considered?
 - Is there strong intervisibility between the towns?
 - How do the gaps between smaller settlements affect the perceived gaps between towns?
 - Are there any separating features between the towns including e.g. hills, woodland blocks etc. which increase the sense of separation between the settlements?
 - Are there any connecting features between the towns including e.g. roads, railways which reduce the sense of separation between the settlements?
 - What is the overall fragility/ robustness of the gap taking the above into account?

4.17 **Table 4.3** summarises the criteria that were used for the assessment of Purpose 2 in the study.

Table 4.3: Purpose 2 assessment criteria

| Purpose 2: Prevent neighbouring towns from merging | |
|--|---|
| <p>Development/land-use: less developed land will make a stronger contribution – a ‘gap’ which contains a significant amount of development is likely to be weaker than one in which the distinction between settlement and countryside is clearer.</p> <p>Location: land juxtaposed between towns makes a stronger contribution.</p> <p>Size: where the gap between settlements is wide, the Green Belt makes a weaker contribution.</p> <p>Separating features: the presence of physical features that separate towns such as substantial watercourses, landform e.g. hills, or forested areas, can compensate for a narrower gap (in terms of distance). However loss of such features would consequently have a greater adverse impact on settlement separation.</p> <p>Connecting features: where physical features strengthen the relationship between towns, e.g. where they are directly linked by a major road or have a strong visual connection, or where smaller urban settlements lie in between, the gap can be considered more fragile, and the Green Belt consequently makes a greater contribution to maintaining separation.</p> | |
| Strong Contribution | Land that forms a narrow gap between towns, essential to maintaining a sense of separation between them. |
| Moderate Contribution | Land that lies between towns which are near each other, but where there is sufficient physical or visual separation for each town to retain its own distinct setting; or land that retains separation between parts of two towns, but where development elsewhere has significantly compromised the sense of distinction between the two settlements. |
| Weak/No Contribution | Land which is not located within a gap between towns; or land which plays no role, or a very limited role in maintaining the separation between towns due to the presence of significant separating features and/or significant distances between the towns; or land which plays no significant role due to the extent of development; or land forming a gap that is too narrow to create any clear distinction between towns (i.e. a sense of leaving one and arriving in another). |

Purpose 3 assessment criteria

- 4.18 The contribution land makes to safeguarding the countryside from encroachment can be considered in terms of:
- i) the extent to which land displays the characteristics of countryside, i.e. an absence of built or otherwise urbanising uses; and
 - ii) the extent to which land physically relates to the adjacent settlement and to the wider countryside (i.e. whether it has a stronger relationship to urban area than with the wider countryside).
- 4.19 Physical landscape elements (or a lack of them), may strengthen or weaken the relationship between settlement and adjacent countryside, but there needs to be significant urban influence from adjacent land, and a degree of physical containment to limit contribution to this purpose. Intervisibility between open land and an urban area is not in itself enough to constitute a significant urban influence: the urban area would need to be a dominating influence either through: i) the scale of development; or ii) the degree of containment of the open land by development. Also the presence of landscape elements (e.g. landform or woodland) that strongly contain an area, and consequently separate it from the wider countryside, may give land a strong relationship with a visible urban area even if buildings are not particularly dominant.
- 4.20 It is important to maintain a distinction between contribution to Purpose 3 and contribution to landscape/visual character. For example, land that displays a strong landscape character in terms of sense of tranquillity, good management practices or high scenic value, or which has public recreational value, may have high sensitivity from a landscape/visual point of view. However the same land in Green Belt terms may well make as equal a contribution to Purpose 3 as land at the urban edge which retains its openness and a relationship with the wider countryside.
- 4.21 In summary, key questions asked in assessing Purpose 3: safeguarding the countryside from encroachment include:
- To what extent does the land exhibit the characteristics of the countryside – i.e. an absence of built or otherwise urbanising development?
 - Disregarding the condition of land, are there urbanising influences within or adjacent which reduce the sense of it being countryside?
 - Does land relate more strongly to the settlement(s), or to the wider countryside?
- 4.22 **Table 4.4** summarises the criteria that were used for the assessment of Purpose 3 in the study.

Table 4.4: Purpose 3 assessment criteria

| Purpose 3: Assist in safeguarding the countryside from encroachment | |
|--|--|
| Development/land-use: where there is less urbanising land use and more openness, land makes a stronger contribution. | |
| Separating features: land that has a stronger relationship with countryside than with the settlement makes a stronger contribution. | |
| Connecting features: an absence of physical features to link settlement and countryside means that land makes a stronger contribution. | |
| Strong Contribution | Land that contains the characteristics of open countryside (i.e. an absence of built or otherwise urbanising uses in Green Belt terms ⁴⁶) and which does not have a stronger relationship with the urban area than with the wider countryside. |

⁴⁶ This does not include development which is deemed to be appropriate, or not inappropriate within the Green Belt as set out in Paragraphs 145 and 146 of the NPPF.

| | |
|------------------------------|---|
| Moderate Contribution | Land that contains the characteristics of open countryside (i.e. an absence of built or otherwise urbanising uses in Green Belt terms), and which has a stronger relationship with the urban area than with the wider countryside (i.e. it is contained in some way by urbanising and or other features); or Land which retains some degree of openness and has some relationship with the wider countryside but which is compromised by urbanising development or uses within it. |
| Weak/No Contribution | Land that contains urbanising development of a scale, density or form that significantly compromises openness; or Land which is too influenced and contained by urban development to retain any significant relationship with the wider countryside. |

Purpose 4 assessment criteria

- 4.23 The connection between a historic town’s historic character and the wider countryside does not have to be physical, indeed successions of development often isolate core historic areas from the surrounding countryside; it is often a visual connection. This visual connection can be defined through movement through the area, or views into or out of the settlement. It should also be noted that the connection is not always visual, for example where the wider open countryside surrounding a historic town contributes to its setting and special character collectively as a whole.
- 4.24 In summary, key questions asked in assessing Purpose 4 include:
- What is the relationship of the land with the historic town?
 - Does the land form part of the setting and/or special character of an historic town?
 - What elements/areas important to the setting and special character of a historic town would be affected by loss of openness?
- 4.25 Consideration of the setting of individual heritage assets extends only to their contribution to the character and legibility of the historic towns.
- 4.26 **Table 4.5** summarises the criteria that were used for the assessment of Purpose 4 in the study.

Table 4.5: Purpose 4 assessment criteria

| Purpose 4: Preserve the setting and special character of historic towns | |
|--|---|
| Development/land-use: less developed land makes a stronger contribution. | |
| Location: an area that contains key characteristics, or important in views to or from them, makes a stronger contribution. | |
| Separating features: land that lacks physical features to create separation from a historic town – i.e. land where the Green Belt provides a visual setting for the historic town – makes a stronger contribution. | |
| Connecting features: where there is stronger relationship between historic town and countryside the contribution to this purpose is stronger. | |
| Strong Contribution | The land and its openness makes a key contribution to the characteristics identified as contributing to a historic town’s setting or special character. |
| Moderate Contribution | The land and its openness makes some contribution to the characteristics identified as contributing to a historic town’s setting or special character. |
| Weak/No Contribution | Land forms little or no part of the setting of an historic town and does not contribute to its special character. |

Purpose 5 assessment criteria

- 4.28 As set out in **Chapter 3** above, it was not considered possible to reasonably differentiate between the contribution of different parts of the Green Belt to Purpose 5. Given the historic and continued strategy to recycle brownfield land in the adjoining Black Country authorities, as set out in the Black Country Core Strategy and targeted through identified regeneration areas, the significant area of brownfield land within the Black Country, the presence of brownfield land within South Staffordshire, and the location of South Staffordshire and the Black Country authorities within the same Housing Market Area, it is concluded that all Green Belt land within South Staffordshire makes a strong contribution to urban regeneration by encouraging the recycling of derelict and other urban land.

Stage 1 Strategic Assessment Outputs

Analysis of variations in contribution to Green Belt purposes

- 4.29 The Stage 1 outputs are discussed in **Chapter 5**. Maps illustrating the assessed variations in contribution for each purpose across South Staffordshire are also set out in **Chapter 5**. Each map is accompanied by supporting text describing the pattern of variation and the reasoning behind its definition.
- 4.30 By combining the lines marking variations in contribution to Green Belt purposes, a list of land parcels was generated, each of which has a reference number and a rating for contribution to each purpose. The parcels are the product of the assessment rather than a precursor to it. The reasoning behind this approach was to draw out variations in contribution to inform the site-specific assessments undertaken at Stage 2, avoiding broad variations in contribution within prematurely and more arbitrarily defined parcels. Avoiding significant variations in contribution within defined parcels prevents the need for ratings to be generalised to reflect the strongest or average level of contribution within a defined area.

5 Stage 1 Findings

Introduction

- 5.1 The primary aim of the Stage 1 assessment was to establish the variation in the contribution of designated land to achieving Green Belt purposes. Based on the assessment definitions and criteria outlined in **Chapters 3 and 4**, a review of the contribution of Green Belt land to each of the Green Belt purposes was undertaken, drawing out spatial variations in the contribution of Green Belt land to each Green Belt purpose. This chapter summarises the findings of the Stage 1 assessment.

Key Findings

- 5.2 **Figure 5.1 - Figure 5.4 (a-b)** illustrate the assessed variations in contribution across the Study Area for each of the first four purposes. The colours used in the figures correspond with the rating colours used in **Table 4.2-Table 4.5** in **Chapter 4**. The four maps were overlaid so that the resulting boundaries reflect changes in contribution to any of those Green Belt purposes, and therefore distinguish parcels of land in which the contribution to the four purposes is the same. This process has resulted in the definition of 82 parcels of varying sizes, which are illustrated in **Figure 5.5 (a-b)**. **Table 5.1** provides a summary of the contribution ratings for each parcel to each of the first four NPPF Green Belt purposes.
- 5.3 **Appendix 2** sets out the justification for the Stage 1 ratings in relation to each of the Stage 1 assessment parcels, for each of the NPPF purposes. As explained in **Chapter 4**, all parcels are considered to perform strongly against purpose 5.

Table 5.1: Assessment of Contribution Ratings for Each Parcel

| Parcel No | Parcel Area (ha) | Purpose 1 Rating <i>Checking unrestricted sprawl</i> | Purpose 2 Rating <i>Preventing merging towns</i> | Purpose 3 Rating <i>Safeguarding countryside from encroachment</i> | Purpose 4 Rating <i>Preserving setting and special character of historic towns</i> |
|-----------|------------------|---|---|---|---|
| S1 | 972.4 | Weak / No contribution | Weak / No contribution | Strong | Weak / No contribution |
| S2 | 2,102.6 | Moderate | Weak / No contribution | Strong | Weak / No contribution |
| S3 | 13.3 | Moderate | Weak / No contribution | Moderate | Weak / No contribution |
| S4 | 1,110.4 | Strong | Weak / No contribution | Strong | Weak / No contribution |
| S5 | 4.9 | Weak / No contribution | Weak / No contribution | Moderate | Weak / No contribution |
| S6 | 44.4 | Weak / No contribution | Weak / No contribution | Moderate | Weak / No contribution |
| S7 | 15.5 | Weak / No contribution | Moderate | Moderate | Weak / No contribution |
| S8 | 8.2 | Weak / No contribution | Weak / No contribution | Moderate | Weak / No contribution |
| S9 | 3.1 | Weak / No contribution | Weak / No contribution | Moderate | Weak / No contribution |
| S10 | 8.2 | Weak / No contribution | Weak / No contribution | Moderate | Weak / No contribution |
| S11 | 4.9 | Moderate | Moderate | Moderate | Weak / No contribution |
| S12 | 2.0 | Weak / No contribution | Weak / No contribution | Moderate | Weak / No contribution |
| S13 | 155.1 | Strong | Moderate | Strong | Weak / No contribution |
| S14 | 2.1 | Weak / No contribution | Weak / No contribution | Weak / No contribution | Weak / No contribution |
| S15 | 53.2 | Strong | Strong | Strong | Weak / No contribution |
| S16 | 650.5 | Strong | Strong | Strong | Weak / No contribution |
| S17 | 3.6 | Moderate | Weak / No contribution | Moderate | Weak / No contribution |
| S18 | 0.6 | Weak / No contribution | Weak / No contribution | Strong | Weak / No contribution |
| S19 | 3.8 | Moderate | Strong | Moderate | Weak / No contribution |
| S20 | 1,221.2 | Strong | Moderate | Strong | Weak / No contribution |
| S21 | 39.9 | Strong | Weak / No contribution | Strong | Weak / No contribution |
| S22 | 3.8 | Moderate | Weak / No contribution | Moderate | Weak / No contribution |

| Parcel No | Parcel Area (ha) | Purpose 1 Rating <i>Checking unrestricted sprawl</i> | Purpose 2 Rating <i>Preventing merging towns</i> | Purpose 3 Rating <i>Safeguarding countryside from encroachment</i> | Purpose 4 Rating <i>Preserving setting and special character of historic towns</i> |
|-----------|------------------|---|---|---|---|
| S23 | 3.3 | Moderate | Weak / No contribution | Moderate | Weak / No contribution |
| S24 | 14.9 | Weak / No contribution | Weak / No contribution | Moderate | Weak / No contribution |
| S25 | 7.7 | Moderate | Weak / No contribution | Strong | Weak / No contribution |
| S26 | 7.8 | Strong | Weak / No contribution | Strong | Weak / No contribution |
| S27 | 2.5 | Moderate | Weak / No contribution | Moderate | Weak / No contribution |
| S28 | 1.2 | Moderate | Moderate | Strong | Weak / No contribution |
| S29 | 2.9 | Moderate | Weak / No contribution | Moderate | Weak / No contribution |
| S30 | 496.5 | Moderate | Moderate | Strong | Weak / No contribution |
| S31 | 104.3 | Moderate | Moderate | Strong | Weak / No contribution |
| S32 | 7,308.4 | Weak / No contribution | Weak / No contribution | Strong | Weak / No contribution |
| S33 | 2.8 | Weak / No contribution | Weak / No contribution | Moderate | Weak / No contribution |
| S34 | 4.4 | Weak / No contribution | Weak / No contribution | Moderate | Weak / No contribution |
| S35 | 0.6 | Weak / No contribution | Weak / No contribution | Weak / No contribution | Weak / No contribution |
| S36 | 9.6 | Weak / No contribution | Weak / No contribution | Moderate | Weak / No contribution |
| S37 | 3.3 | Weak / No contribution | Weak / No contribution | Moderate | Weak / No contribution |
| S38 | 7.3 | Weak / No contribution | Weak / No contribution | Moderate | Weak / No contribution |
| S39 | 2.0 | Weak / No contribution | Weak / No contribution | Moderate | Weak / No contribution |
| S40 | 1.2 | Weak / No contribution | Weak / No contribution | Moderate | Weak / No contribution |
| S41 | 1,262.2 | Moderate | Weak / No contribution | Strong | Weak / No contribution |
| S42 | 20.0 | Strong | Moderate | Moderate | Weak / No contribution |
| S43 | 43.9 | Weak / No contribution | Weak / No contribution | Weak / No contribution | Weak / No contribution |
| S44 | 85.3 | Moderate | Moderate | Strong | Weak / No contribution |
| S45 | 11.1 | Moderate | Weak / No contribution | Moderate | Weak / No contribution |
| S46 | 776.1 | Strong | Weak / No contribution | Strong | Weak / No contribution |
| S47 | 4.0 | Weak / No contribution | Weak / No contribution | Moderate | Weak / No contribution |
| S48 | 36.0 | Moderate | Weak / No contribution | Strong | Weak / No contribution |
| S49 | 3.6 | Weak / No contribution | Weak / No contribution | Moderate | Weak / No contribution |
| S50 | 2.9 | Moderate | Weak / No contribution | Moderate | Weak / No contribution |
| S51 | 885.5 | Moderate | Moderate | Strong | Weak / No contribution |
| S52 | 5.6 | Weak / No contribution | Weak / No contribution | Moderate | Weak / No contribution |
| S53 | 3,072.0 | Moderate | Weak / No contribution | Strong | Weak / No contribution |
| S54 | 371.7 | Strong | Weak / No contribution | Strong | Weak / No contribution |
| S55 | 26.2 | Weak / No contribution | Weak / No contribution | Moderate | Weak / No contribution |
| S56 | 3.4 | Moderate | Weak / No contribution | Moderate | Weak / No contribution |
| S57 | 19.7 | Weak / No contribution | Weak / No contribution | Weak / No contribution | Weak / No contribution |
| S58 | 3.7 | Moderate | Weak / No contribution | Moderate | Weak / No contribution |
| S59 | 487.8 | Strong | Weak / No contribution | Strong | Weak / No contribution |
| S60 | 3.7 | Weak / No contribution | Weak / No contribution | Moderate | Weak / No contribution |
| S61 | 8.6 | Moderate | Weak / No contribution | Strong | Weak / No contribution |
| S62 | 3.6 | Weak / No contribution | Weak / No contribution | Moderate | Weak / No contribution |
| S63 | 0.8 | Weak / No contribution | Weak / No contribution | Weak / No contribution | Weak / No contribution |
| S64 | 6,447.0 | Weak / No contribution | Weak / No contribution | Strong | Weak / No contribution |
| S65 | 11.6 | Weak / No contribution | Weak / No contribution | Moderate | Weak / No contribution |
| S66 | 4.2 | Weak / No contribution | Weak / No contribution | Moderate | Weak / No contribution |
| S67 | 406.4 | Strong | Moderate | Strong | Weak / No contribution |
| S68 | 4.4 | Strong | Weak / No contribution | Strong | Weak / No contribution |
| S69 | 117.7 | Strong | Strong | Strong | Weak / No contribution |
| S70 | 2.5 | Weak / No contribution | Weak / No contribution | Moderate | Weak / No contribution |
| S71 | 749.3 | Strong | Weak / No contribution | Strong | Weak / No contribution |
| S72 | 263.1 | Moderate | Moderate | Strong | Weak / No contribution |
| S73 | 3.8 | Weak / No contribution | Weak / No contribution | Weak / No contribution | Weak / No contribution |
| S74 | 19.5 | Moderate | Weak / No contribution | Moderate | Weak / No contribution |
| S75 | 559.5 | Strong | Weak / No contribution | Strong | Weak / No contribution |
| S76 | 10.1 | Weak / No contribution | Weak / No contribution | Moderate | Weak / No contribution |

| Parcel No | Parcel Area (ha) | Purpose 1 Rating <i>Checking unrestricted sprawl</i> | Purpose 2 Rating <i>Preventing merging towns</i> | Purpose 3 Rating <i>Safeguarding countryside from encroachment</i> | Purpose 4 Rating <i>Preserving setting and special character of historic towns</i> |
|-----------|------------------|---|---|---|---|
| S77 | 1.5 | Weak / No contribution | Weak / No contribution | Moderate | Weak / No contribution |
| S78 | 431.7 | Weak / No contribution | Moderate | Strong | Weak / No contribution |
| S79 | 10.0 | Weak / No contribution | Weak / No contribution | Weak / No contribution | Weak / No contribution |
| S80 | 18.0 | Weak / No contribution | Weak / No contribution | Moderate | Weak / No contribution |
| S81 | 787.1 | Moderate | Moderate | Strong | Weak / No contribution |
| S82 | 716.5 | Strong | Moderate | Strong | Weak / No contribution |

Assessment of Contribution to Green Belt Purpose 1

5.4 Green Belt Purpose 1 seeks to check the unrestricted sprawl of large built-up areas. The West Midlands conurbation, including most land within the adjoining authorities of the City of Wolverhampton, Dudley and Walsall, is a large built-up area, and the combination of Cannock and Hednesford and the adjoining area of Great Wyrley (including Cheslyn Hay) is also defined as a large built-up area.

North of the West Midlands conurbation

- 5.5 The M54 and associated and nearby woodland create a physical and visual screen between the conurbation and countryside to the north, but play a weaker role where large commercial buildings dominate the urban edge at the I54 industrial estate. Land north of the motorway in the Coven Heath area therefore has an association with the large built-up area despite clear separation by a significant boundary, and so contributes strongly to preventing sprawl. There are no specific physical features to the west of Coven and Coven Heath that mark a distinction between areas considered to make a strong contribution, moderate or weak contribution to this purpose, but the absence of other settlements with which land can be associated is considered to increase the extent to which it is associated with the nearby large built-up area.
- 5.6 Brinsford and Featherstone are likewise separated from the large built-up area by the M54 but the proximity of development between Moseley Parklands and Brinsford along Cat and Kittens Lane, and the lack of any significant gaps in development along the A460 between the urban edge at Westcroft and the village of Featherstone to the north of the M54, means that land between these settlements and the large built-up area plays a significant role with regard to this purpose. Residential development and most of the prison at Brinsford are washed over, but the impact of development on openness limits their contribution to Green Belt purposes.
- 5.7 Open land adjacent to Brinsford, Featherstone or Coven that contributes to separation between those settlements is judged to make a moderate contribution to preventing sprawl of the large built-up area, as it helps to retain a distinction between separate villages and more contiguous urban development, but land to the north of these settlements is considered to make a weaker contribution in this respect.
- 5.8 The size of the Green Belt area contained between the M54 and the large built-up area means that it is for the most part not sufficiently contained by urbanising influences for development to be considered infill rather than expansion. The absence of any significant separating features to diminish association with the large built-up area therefore means that contribution to Purpose 1 is strong. This includes land around Essington, because there is little separation between the inset village and the large built-up area.
- 5.9 Land in the narrow gap between the West Midlands Conurbation and the Cannock/ Hednesford/ Cheslyn Hay/ Great Wyrley large built-up area makes a *strong* contribution to Purpose 1.

West of the West Midlands conurbation

- 5.10 Most land in South Staffordshire close to the conurbation lacks strong containment by development and therefore makes a *strong* contribution to Purpose 1.

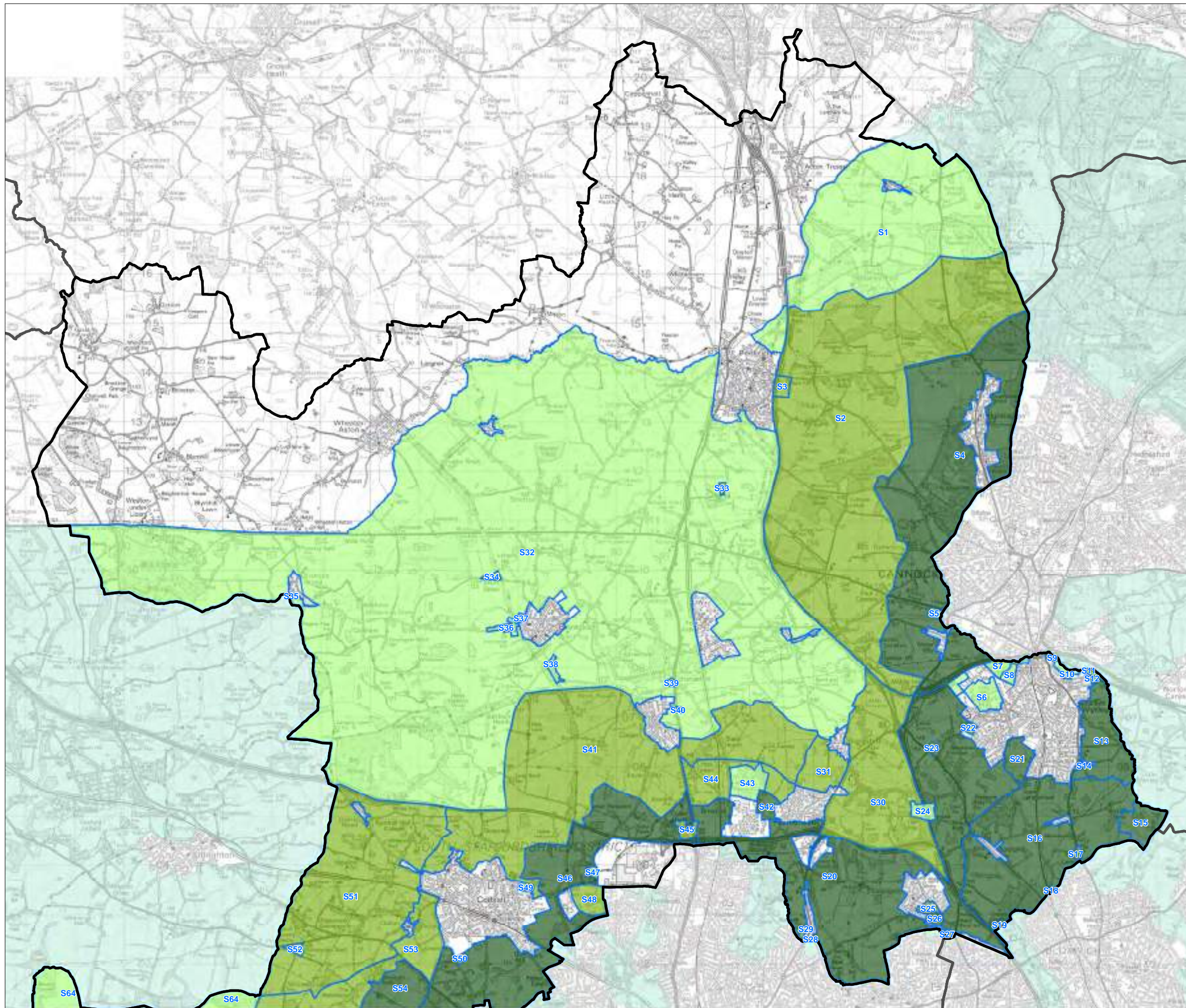
- 5.11 The limited separation between Codsall, Wombourne and the contiguous conurbation, and the narrow separation between Perton and Tettenhall, means that land adjacent to these settlements that forms part of their separation, and which also retains a relationship with the wider countryside and is not dominated by the urban area, is considered to make a strong contribution to Purpose 1. Reduction in separation would increase the extent to which the settlements are perceived to form part of the large built-up area. However there are a few locations within the narrower strips/wedges of Green Belt that separate villages (e.g. Perton) from the main body of the conurbation that are too contained to make a strong contribution, regardless of openness.
- 5.12 Westward expansion of these settlements would also be considered to have an association with the large built-up area, but contribution of land to this purpose is moderate because the direct association is with settlements that still retain some separation of identity from the main conurbation.

West of Cannock

- 5.13 There is a distinct ridge crest woodland belt forming an edge to the northern part of the Cannock urban area, and separating the main body of the town from Huntington, a settlement which is contiguous at its southern end but which occupies a distinct setting contained by landform and woodland along its southern half. Open land in this area is therefore considered to make a *strong* contribution to preventing sprawl.
- 5.14 The wooded heathland of Shoal Hill creates a strong distinction between the large built-up area and land to the west but there is insufficient separation for land not to make a *moderate* contribution to Purpose 1.
- 5.15 Further south, down to the A5, Hatton Road forms a consistent, unbroken settlement edge (with tree cover in most places), and beyond this the parkland around Hatherton Hall and low hills contain the urban edge and so play a *strong* role in preventing sprawl. South of the A5, Saredon Brook and Lodge Hill define a clear urban edge so land beyond also makes a *strong* contribution.

South Staffordshire
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Figure 5.1a: Green Belt Purpose 1 -
Checking the Unrestricted Sprawl of
Large Built-Up Areas - South
Staffordshire North



- South Staffordshire (North)
- Other Local Authority
- Green Belt outside project area
- Stage 1 parcel
- Purpose 1 rating
- Strong
- Moderate
- Weak / No contribution

0 2 km

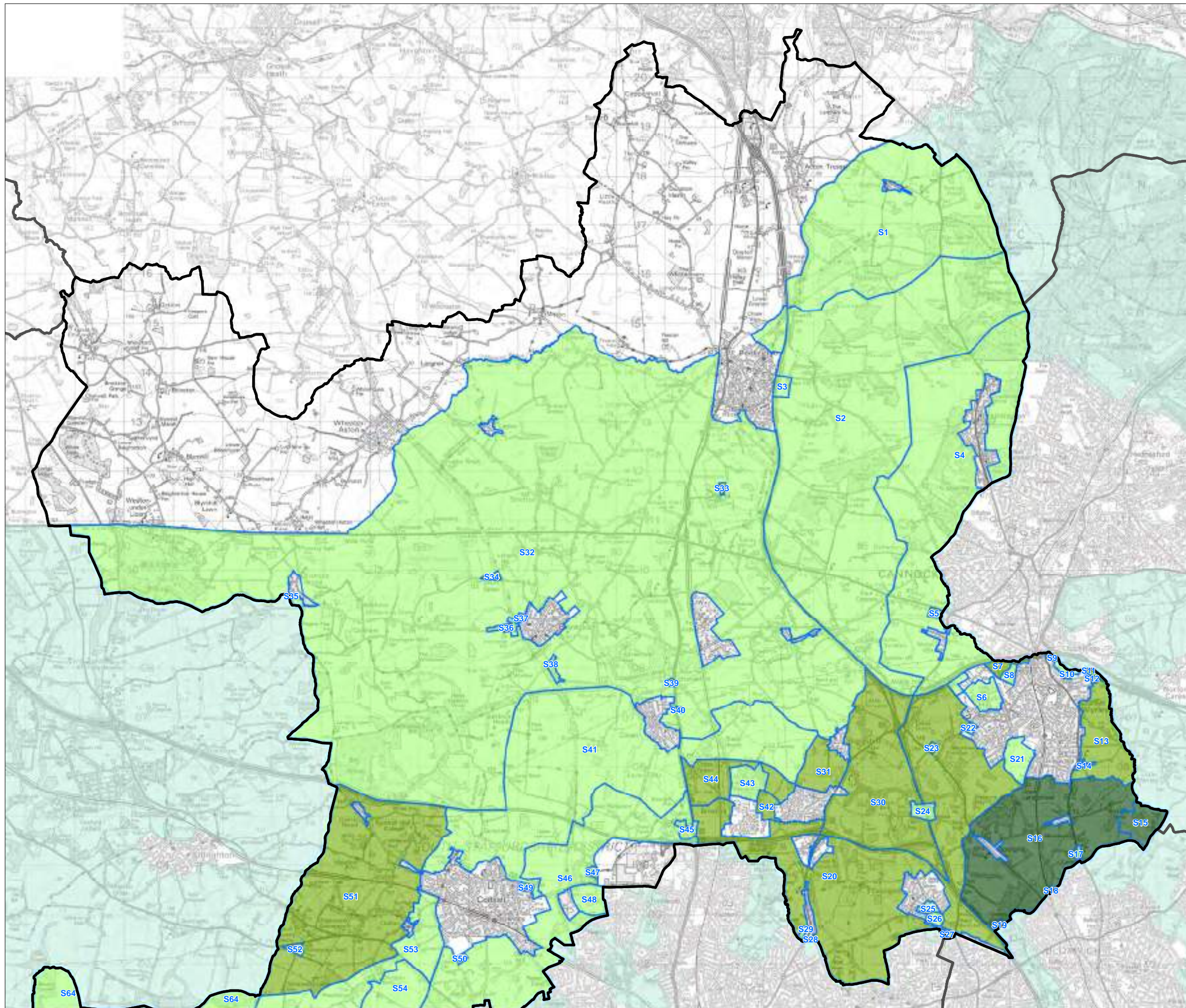









Assessment of Contribution to Green Belt Purpose 2

- 5.16 Green Belt Purpose 2 seeks to prevent neighbouring towns from merging into one another.
- 5.17 Only 1.5km separate Bloxwich from Landywood, at the southern end of Great Wyrley. Inset development on Long Lane and the A34 Walsall Road, and washed over but urbanising development along the A34 near Bloxwich, reduce perceived separation. There are no significant separating physical features and the A34 and railway provide direct transport links. This gap between towns is therefore considered fragile, and no land within it is sufficiently urbanised to make less than a strong contribution to Purpose 2. Land peripheral to the core gap makes a *moderate* contribution.
- 5.18 There is a wider gap between Great Wyrley and Wolverhampton, but inset development at Brinsford, Featherstone, Hilton Main Industrial Estate and Shareshill reduces perceived separation. Contribution of these areas is *moderate*. Similarly, inset development at Essington and Springhill reduces perceived separation between Great Wyrley and Wednesfield.
- 5.19 Although Great Wyrley and Cannock are close enough to be considered to constitute a single large built-up area there is clear distinction between settlements; however the M6 Toll and associated tree planting form the key element in this narrow gap, rather than remaining open land. Where the gap to M6 is wider, there is no visual separation between the settlements (tall commercial buildings to the north are prominent), so the remaining open land plays a limited role. Land in this area therefore makes a *moderate* or *weak* contribution.
- 5.20 Great Wyrley and Brownhills are a little under 5km apart along the A5, but the inset Brownhills West lies close to the edge of Brownhills, reducing open countryside separation. To the north of the M6 Toll, the large inset village of Norton Canes occupies much of the gap between Brownhills and Cannock, but the motorway, which is visually contained, creates separation that limits the visual impact of this on the gap between towns. Land in South Staffordshire to the east of Great Wyrley forms part of this gap, and makes a *moderate* contribution.
- 5.21 To the north west of the conurbation, Cannock and Stafford are some 7km apart, separated by open countryside with few urbanising influences. This is considered to be a relatively strong gap so Green Belt land makes a *weak* contribution to this purpose. The gap to the west between the conurbation and the Shropshire town of Bridgnorth is large, and the presence of intervening inset villages (Wombourne and Kinver) doesn't strengthen the contribution of open land, but the gap between Codsall and Albrighton is small enough for land in between to be considered to make a *moderate* contribution to preserving their separation.
- 5.22 To the west of the conurbation, there is a smaller gap between Wolverhampton and Dudley to the east of Wombourne, where land makes a *moderate* contribution to the separation of Wolverhampton and Dudley. In addition, the land directly adjoining the two settlements forms part of the narrow gap between them, and makes a *strong* contribution to preserving their separation.
- 5.23 To the south-west of the conurbation there is also a smaller gap between Stourbridge and Kidderminster, and the presence of intervening inset villages (Cookley, Kinver, Dunsley, Stourton, Blakedown and West Hagley) does diminish separation and therefore strengthen the contribution of open land to *moderate*.

South Staffordshire
Green Belt Study

Figure 5.2a: Green Belt Purpose 2 - Preventing the Merging of Neighbouring Towns - South Staffordshire North



-  South Staffordshire (North)
-  Other Local Authority
-  Green Belt outside project area
-  Stage 1 parcel
- Purpose 2 rating
-  Strong
-  Moderate
-  Weak / No contribution

0 2 km

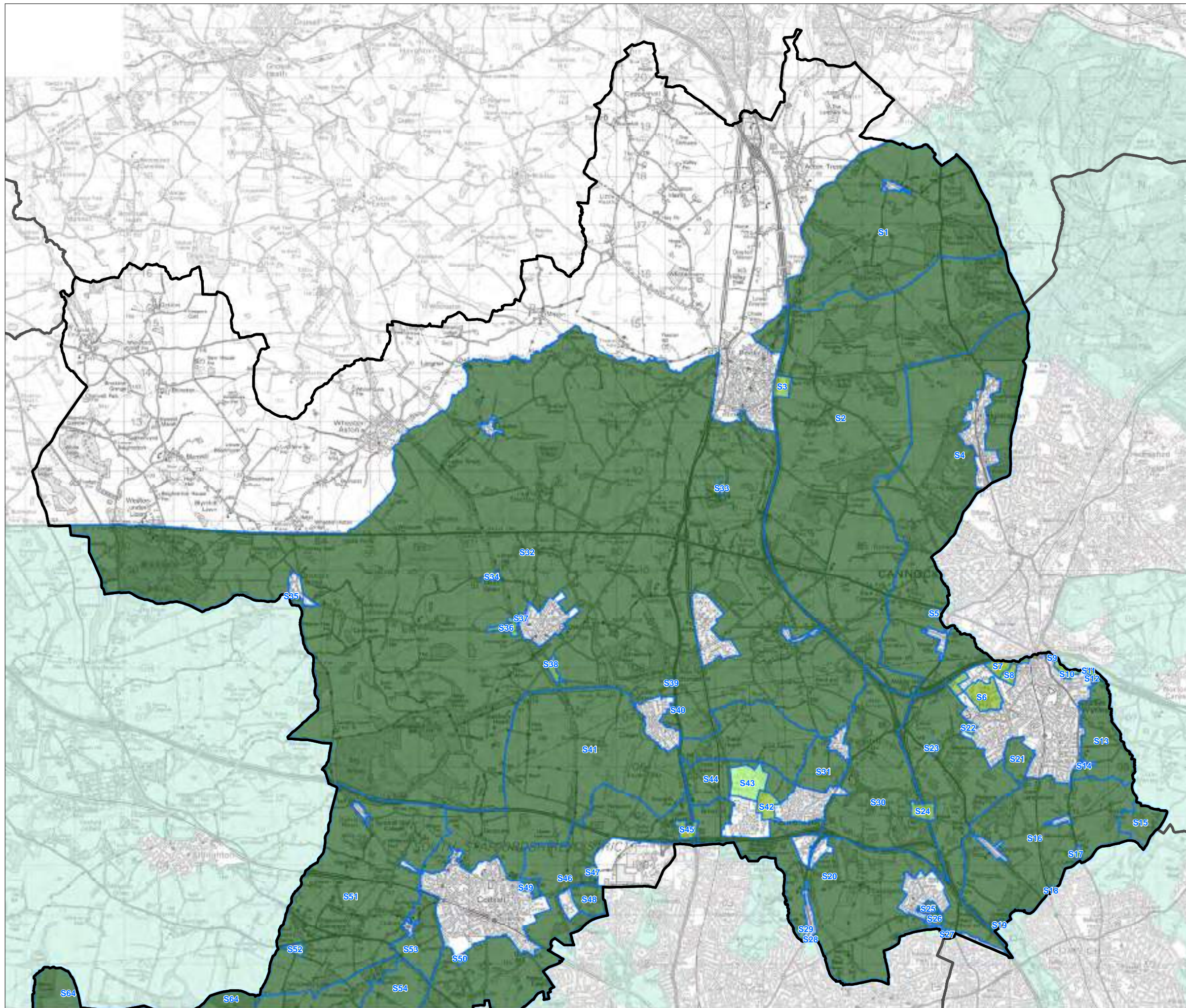


Assessment of Contribution to Green Belt Purpose 3

- 5.24 Green Belt Purpose 3 seeks to assist in safeguarding the countryside from encroachment.
- 5.25 The vast majority of land in South Staffordshire makes a *strong* contribution to preventing encroachment on the countryside. Other than isolated countryside locations where development has reduced openness, only small areas on the fringes of Great Wyrley / Cheslyn Hay and Wolverhampton and adjacent to the main inset villages (e.g. Wombourne, Featherstone, Kinver and Pattingham) are considered (due to loss of openness or containment by urbanising influences) to make a weaker contribution. Land between Perton and Tettenhall is considered to be too narrow and too contained by urban development to retain any significant openness or relationship with the wider countryside.

South Staffordshire Green Belt Study

Figure 5.3a: Green Belt Purpose 3 -
Safeguarding the Countryside from
Encroachment - South Staffordshire
North



- South Staffordshire (North)
- Other Local Authority
- Green Belt outside project area
- Stage 1 parcel
- Purpose 3 rating
 - Strong
 - Moderate
 - Weak / No contribution

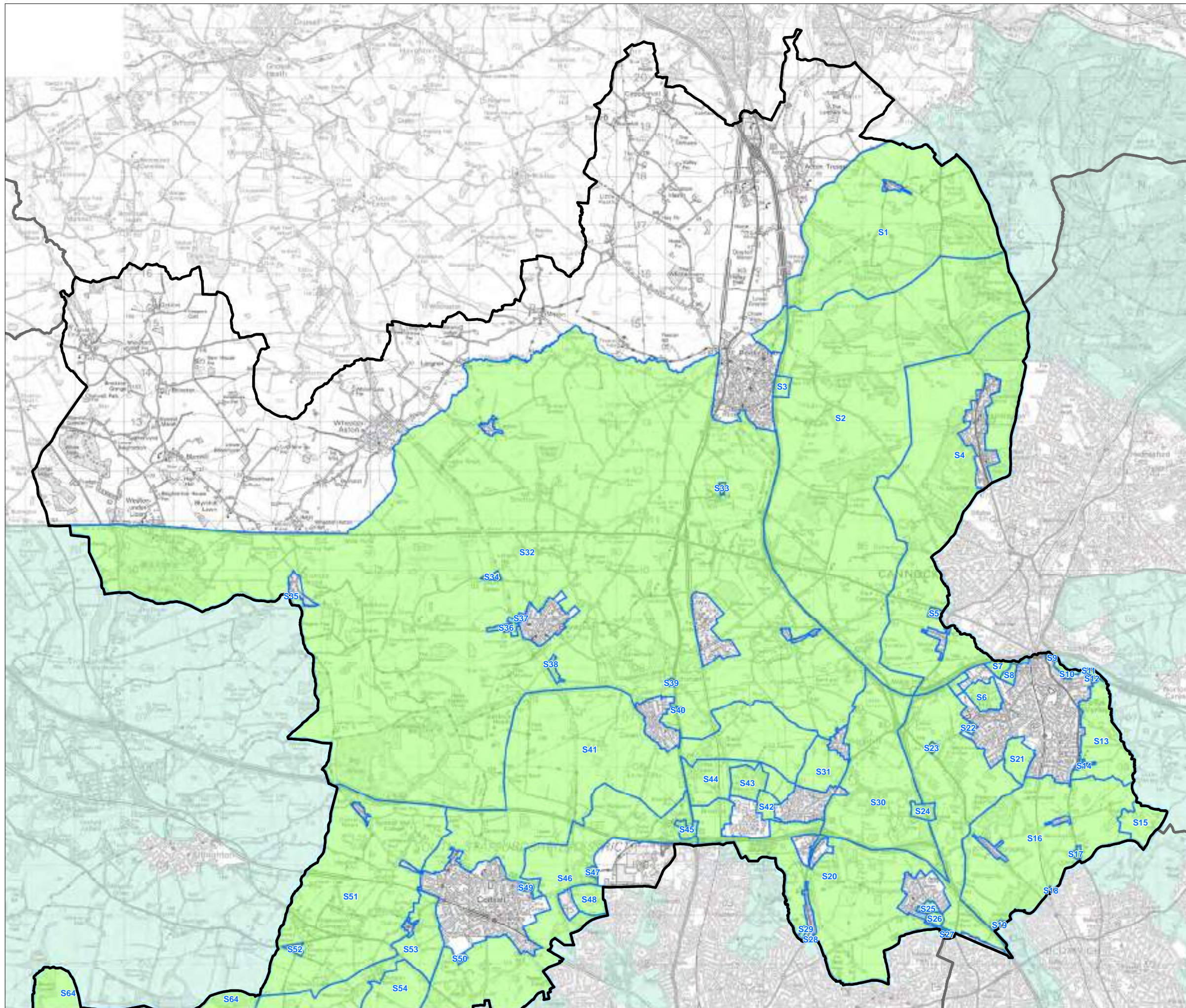
Assessment of Contribution to Green Belt Purpose 4

- 5.26 Purpose 4 of the NPPF Green Belt purposes seeks to preserve the setting and special character of historic towns. As set out in Section 3, analysis as part of this study has determined that no Green Belt land in South Staffordshire makes a contribution to the setting or special character of a historic town.

South Staffordshire Green Belt Study

Figure 5.4a: Green Belt Purpose 4 -
Preserve the Setting and Special
Character of Historic Towns - South
Staffordshire North

- South Staffordshire (North)
- Other Local Authority
- Green Belt outside project area
- Stage 1 parcel
- Purpose 4 rating
- Weak / No contribution



0 2 km



7 Stage 2 Findings

Introduction

- 7.1 This chapter sets out the findings of the assessment of Green Belt harm (as outlined in **Chapter 6**).
- 7.2 As outlined in **Chapter 6**, the assessment of harm included the following steps:
- Step 1: Consideration of contribution ratings in more depth.
 - Step 2: Assessment potential impact of release on the integrity of the remaining Green Belt, including consideration of the strength of residual Green Belt boundaries.
 - Step 3: Assessment overall Green Belt harm.
 - Step 4: Consideration of harm resulting from alternative Green Belt release 'scenarios'.
- 7.3 Where there were variations in the three factors influencing Green Belt harm across sub-parcel, different harm scenarios were identified to reflect any variations in harm. This took into account the fact that harm may vary if development is constrained to a smaller more contained area within the sub-parcel as a whole, or harm may differ if sub-parcels are released as extensions of existing inset settlements, or as new inset areas.
- 7.4 The findings for the assessment of harm, together with the Stage 1 contribution to Green Belt purposes, are presented in **Appendix 3** on a sub-parcel by sub-parcel basis. Ratings and commentary are provided for each release scenario considered.

Summary of findings

- 7.5 The detailed findings of the assessment of harm are included in **Appendix 3** and are summarised by sub-parcel in **Table 7.1** and by site **Table 7.2** below. **Figure 7.1 (a-b)** show the sub-parcels within South Staffordshire, and **Figure 7.2 (a-b)** the absolute constraints to development. **Figure 7.3 (a-b)** show the potential degree of harm that would result if the sub-parcel scenarios were released. **Table 7.3** summarises the amount of land identified (in hectares and percentages) for each level of harm (i.e. very low to very high).
- 7.6 Where sub-parcels are assessed as having lower harm to the Green Belt if they were to be removed, this does not necessarily mean that those areas should be released. Any release of Green Belt land requires consideration of the 'exceptional circumstances' justifying its release. The relatively poor performance of the land against Green Belt purposes is not, of itself, an exceptional circumstance that can justify release of the land from the Green Belt. Other factors, such as the sustainability and the ability to meet development needs outside of the Green Belt also need to be taken into consideration. This is explained further below.

Table 7.1: Green Belt assessment of harm ratings: by sub-parcel

| Sub-parcel Scenario | Area excluding constraints (ha) | Harm Rating |
|---------------------|---------------------------------|-----------------|
| S1As1 | 16.1 | Moderate |
| S1As2 | 6.8 | Moderate - High |
| S1Bs1 | 41.7 | Moderate - High |
| S2As1 | 78.1 | High |
| S2Bs1 | 16.4 | High |
| S3As1 | 12.8 | Moderate - High |
| S4As1 | 86.0 | Very High |
| S4Bs1 | 180.3 | High |
| S4Cs1 | 64.6 | Very High |
| S4Cs2 | 11.1 | High |
| S4Cs3 | 2.5 | Moderate - High |
| S4Ds1 | 78.8 | Very High |
| S4Ds2 | 64.3 | High |
| S5As1 | 4.3 | Low - Moderate |
| S6As1 | 44.4 | Low - Moderate |
| S7As1 | 2.8 | Moderate |
| S8As1 | 8.0 | Low - Moderate |
| S10As1 | 0.6 | Moderate |
| S10As2 | 2.0 | Low - Moderate |
| S11As1 | 4.4 | Moderate |
| S12As1 | 2.0 | Low |
| S13As1 | 28.2 | High |
| S13Bs1 | 87.5 | High |
| S13Bs2 | 25.5 | Moderate |
| S14As1 | 2.1 | Very Low |
| S15As1 | 53.0 | Very High |
| S16As1 | 72.0 | Very High |
| S16Bs1 | 15.6 | High |
| S16Cs1 | 91.8 | Very High |
| S16Ds1 | 77.0 | Very High |
| S16Ds2 | 8.7 | High |
| S16Ds3 | 3.8 | Moderate - High |
| S17As1 | 3.6 | Moderate |
| S18As1 | 0.6 | Moderate |
| S19As1 | 3.8 | Moderate - High |
| S20As1 | 31.0 | High |
| S20Bs1 | 15.9 | Moderate - High |
| S20Cs1 | 131.1 | High |
| S20Ds1 | 56.5 | Very High |
| S20Es1 | 96.5 | Very High |
| S20Es2 | 77.7 | High |
| S20Es3 | 16.2 | Moderate - High |
| S20Fs1 | 240.2 | High |
| S20Gs1 | 35.4 | Moderate |
| S20Hs1 | 69.5 | Moderate - High |
| S21As1 | 39.9 | Moderate |
| S22As1 | 3.8 | Low |
| S25As1 | 7.7 | Moderate |
| S26As1 | 7.8 | Moderate - High |
| S27As1 | 2.5 | Low |
| S28As1 | 1.2 | Low - Moderate |

| Sub-parcel Scenario | Area excluding constraints (ha) | Harm Rating |
|---------------------|---------------------------------|-----------------|
| S29As1 | 2.9 | Low - Moderate |
| S30As1 | 21.3 | Moderate - High |
| S30Bs1 | 30.3 | High |
| S30Cs1 | 115.5 | High |
| S30Cs2 | 9.7 | Moderate - High |
| S30Cs3 | 3.4 | Moderate |
| S31As1 | 49.1 | High |
| S31As2 | 55.3 | Moderate - High |
| S32As1 | 110.9 | Moderate - High |
| S32As2 | 0.7 | Moderate |
| S32Bs1 | 71.9 | Moderate - High |
| S32Cs1 | 10.9 | High |
| S32Cs2 | 23.7 | Moderate |
| S32Ds1 | 13.8 | Moderate - High |
| S32Ds2 | 1.0 | Moderate |
| S32Es1 | 225.9 | High |
| S32Es2 | 347.2 | Moderate - High |
| S32Fs1 | 171.7 | High |
| S32Fs2 | 54.0 | Moderate - High |
| S32Fs3 | 5.2 | Low - Moderate |
| S32Gs1 | 25.2 | High |
| S32Hs1 | 106.8 | High |
| S32Is1 | 68.5 | High |
| S32Js1 | 22.9 | High |
| S32Js2 | 7.7 | Moderate - High |
| S32Js3 | 8.0 | Moderate |
| S32Ks1 | 26.5 | Moderate - High |
| S32Ls1 | 61.4 | Moderate - High |
| S32Ls2 | 2.7 | Moderate |
| S32Ms1 | 12.5 | Low - Moderate |
| S33As1 | 2.8 | High |
| S35As1 | 0.6 | Very Low |
| S36As1 | 2.8 | Moderate |
| S36As2 | 6.8 | Low - Moderate |
| S37As1 | 3.3 | Low - Moderate |
| S38As1 | 6.6 | Moderate - High |
| S40As1 | 1.2 | Moderate - High |
| S41As1 | 35.3 | High |
| S41As2 | 52.8 | Moderate - High |
| S41As3 | 10.8 | Moderate |
| S41Bs1 | 126.5 | High |
| S41Bs2 | 3.8 | Moderate - High |
| S41Cs1 | 5.8 | Moderate - High |
| S42As1 | 20.0 | Moderate |
| S43As1 | 14.5 | Low - Moderate |
| S43As2 | 29.4 | Very Low |
| S44As1 | 64.3 | High |
| S44As2 | 12.0 | Moderate - High |
| S45As1 | 10.6 | Moderate |
| S46As1 | 63.3 | Moderate - High |
| S46Bs1 | 251.5 | High |
| S46Bs2 | 13.9 | Moderate - High |
| S46Cs1 | 144.9 | Very High |

| Sub-parcel Scenario | Area excluding constraints (ha) | Harm Rating |
|---------------------|---------------------------------|-----------------|
| S46Cs2 | 58.4 | High |
| S46Ds1 | 62.1 | Very High |
| S46Es1 | 62.9 | Very High |
| S46Fs1 | 18.7 | Very High |
| S46Gs1 | 2.5 | Moderate - High |
| S47As1 | 4.0 | Moderate |
| S48As1 | 33.0 | High |
| S49As1 | 3.6 | Low - Moderate |
| S50As1 | 2.9 | Moderate |
| S51As1 | 72.7 | High |
| S51Bs1 | 13.5 | High |
| S51Bs2 | 29.9 | Moderate - High |
| S53As1 | 27.6 | High |
| S53As2 | 10.9 | High |
| S53As3 | 6.2 | Moderate |
| S53Bs1 | 117.0 | Moderate - High |
| S53Bs2 | 3.2 | Low - Moderate |
| S53Cs1 | 61.9 | Moderate - High |
| S53Cs2 | 98.8 | Moderate |
| S53Cs3 | 3.8 | Low - Moderate |
| S53Ds1 | 39.6 | Moderate - High |
| S53Ds2 | 17.3 | Moderate |
| S53Ds3 | 1.5 | Low - Moderate |
| S53Es1 | 25.2 | Moderate - High |
| S53Fs1 | 68.2 | Moderate - High |
| S53Fs2 | 0.2 | Moderate |
| S53Gs1 | 106.5 | High |
| S53Hs1 | 45.5 | High |
| S53Hs2 | 14.4 | Moderate - High |
| S53Hs3 | 4.1 | Moderate |
| S54As1 | 13.2 | High |
| S54Bs1 | 200.8 | Very High |
| S54Bs2 | 132.6 | High |
| S55As1 | 26.1 | Moderate - High |
| S56As1 | 3.4 | Low - Moderate |
| S57As1 | 19.7 | Low |
| S58As1 | 3.7 | Low - Moderate |
| S59As1 | 12.5 | Moderate |
| S59Bs1 | 102.3 | High |
| S59Bs2 | 14.5 | Moderate - High |
| S59Cs1 | 93.7 | High |
| S59Cs2 | 21.1 | Moderate - High |
| S59Ds1 | 31.0 | Moderate - High |
| S60As1 | 3.7 | Low |
| S62As1 | 3.6 | Low |
| S63As1 | 0.8 | Very Low |
| S64As1 | 74.0 | Moderate - High |
| S64As2 | 13.8 | Moderate |
| S64As3 | 0.7 | Low - Moderate |
| S64Bs1 | 13.8 | Moderate - High |
| S64Cs1 | 6.1 | Moderate |
| S64Cs2 | 5.8 | Low - Moderate |
| S64Ds1 | 24.1 | Moderate - High |

| Sub-parcel Scenario | Area excluding constraints (ha) | Harm Rating |
|---------------------|---------------------------------|-----------------|
| S64Ds2 | 28.9 | Moderate |
| S64Ds3 | 2.1 | Low - Moderate |
| S64Es1 | 53.6 | Moderate - High |
| S64Es2 | 4.6 | Moderate |
| S64Fs1 | 82.5 | Moderate - High |
| S64Gs1 | 82.0 | Moderate - High |
| S64Gs2 | 34.6 | Moderate |
| S65As1 | 11.6 | Moderate |
| S66As1 | 3.9 | Moderate |
| S67As1 | 370.5 | Very High |
| S68As1 | 4.4 | Moderate |
| S69As1 | 76.0 | Very High |
| S70As1 | 2.4 | Low |
| S71As1 | 112.6 | Very High |
| S71As2 | 37.2 | High |
| S71Bs1 | 109.6 | Very High |
| S71Bs2 | 27.7 | Moderate - High |
| S71Cs1 | 125.4 | Very High |
| S71Cs2 | 16.4 | Moderate - High |
| S72As1 | 90.8 | Moderate - High |
| S72As2 | 30.1 | Moderate |
| S72Bs1 | 89.0 | High |
| S72Bs2 | 9.9 | Moderate - High |
| S72Bs3 | 11.6 | Low - Moderate |
| S73As1 | 3.7 | Very Low |
| S74As1 | 18.9 | Low - Moderate |
| S75As1 | 94.7 | High |
| S75Bs1 | 167.6 | Very High |
| S76As1 | 10.1 | Moderate |
| S78As1 | 60.8 | High |
| S78As2 | 5.0 | Moderate - High |
| S78As3 | 3.1 | Moderate |
| S79As1 | 10.0 | Very Low |
| S80As1 | 6.7 | Low - Moderate |
| S81As1 | 40.1 | High |
| S81As2 | 33.2 | Moderate - High |
| S81As3 | 13.8 | Moderate |
| S82As1 | 50.9 | Very High |
| S82Bs1 | 335.4 | Very High |
| S82Bs2 | 10.5 | Moderate - High |
| S82Bs3 | 5.6 | Moderate |
| S82Cs1 | 28.4 | Very High |
| S82Cs2 | 105.6 | High |

Assessment of harm for Promoted Sites

7.7 The findings of the assessment of harm were overlaid with the identified boundaries of the promoted sites. This includes a small number of sites submitted to the Black Country call for sites that partly fall within South Staffordshire. The results are set out in **Table 7.2**. This summarises the degree of harm that would result from the release of the identified sites. In some cases the degree of harm varies within a site and in these circumstances, the variations are identified and rated separately. **Table 7.4** summarise the amount of land within promoted sites identified (in hectares and percentages) for each level of harm (i.e. very low to very high), with and without absolute constraints being taken into account.

Table 7.2: Green Belt assessment of harm ratings: by site

| Promoted Site | Total Area of Site | Sub-parcel Scenario | Area of site within Sub-parcel Scenario excluding constraints (ha) ⁵¹ | Harm Rating |
|---------------------------------|--------------------|---------------------|--|-----------------|
| Ref: 006 (Housing) | 3.8 | S32Fs3 | 3.8 | Low - Moderate |
| Ref: 017 (Housing) | 2.4 | S4Bs1 | 2.4 | High |
| Ref: 022 (Housing) | 4.8 | S4Bs1 | 4.8 | High |
| Ref: 023 (Housing) | 1.8 | S1Bs1 | 1.7 | Moderate - High |
| Ref: 024 (Housing) | 1.1 | S1Bs1 | 1.0 | Moderate - High |
| Ref: 025 (Housing) | 0.3 | S1Bs1 | 0.2 | Moderate - High |
| Ref: 026 (Housing) | 0.8 | S1Bs1 | 0.8 | Moderate - High |
| Ref: 054 (Housing) | 1.6 | S32Ls1 | 1.6 | Moderate - High |
| Ref: 062 (Housing) | 1.0 | S38As1 | 0.8 | Moderate - High |
| Ref: 065 (Housing) | 0.2 | S36As2 | 0.1 | Low - Moderate |
| | | S32Bs1 | 0.2 | Moderate - High |
| Ref: 067 (Housing) | 5.2 | S38As1 | 0.1 | Moderate - High |
| | | S32Ls1 | 5.1 | Moderate - High |
| Ref: 074 (Housing) | 2.3 | S32Ks1 | 2.3 | Moderate - High |
| Ref: 075 (Housing) | 4.8 | S32Ks1 | 4.7 | Moderate - High |
| Ref: 075a (Housing) | 0.5 | S32Ks1 | 0.5 | Moderate - High |
| Ref: 076 (Housing) | 0.6 | S32Ls2 | 0.6 | Moderate |
| Ref: 076a (Housing) | 0.4 | S32Ls2 | 0.4 | Moderate |
| Ref: 076b (Housing) | 0.6 | S32Ls2 | 0.6 | Moderate |
| Ref: 076c (Housing) | 0.7 | S32Ls2 | 0.7 | Moderate |
| Ref: 078 (Housing) | 0.7 | S32Ls1 | 0.7 | Moderate - High |
| Ref: 079 (Housing) | 2.1 | S32Ks1 | 0.1 | Moderate - High |
| | | S36As1 | 1.9 | Moderate |
| Ref: 082 (Housing) | 5.5 | S32Cs2 | 3.1 | Moderate |
| Ref: 083 (Housing) | 0.2 | S32Ms1 | 0.2 | Low - Moderate |
| Ref: 084 (Housing) | 4.2 | S41Bs2 | 2.5 | Moderate - High |
| Ref: 085 (Housing) | 9.2 | S32Ms1 | 9.1 | Low - Moderate |
| Ref: 087 (Housing) | 0.7 | S32Ms1 | 0.6 | Low - Moderate |
| Ref: 087 (Housing) | 0.7 | S32Hs1 | <0.1 | High |
| Ref: 090 (Housing) | 1.5 | S32Gs1 | 0.1 | High |
| Ref: 091 (Housing) | 0.6 | S32Gs1 | 0.1 | High |
| Ref: 096 (Housing) | 4.1 | S32As1 | 4.1 | Moderate - High |
| Ref: 097 (Housing) | 5.1 | S32As1 | 5.1 | Moderate - High |
| Ref: 099 (Housing) | 1.2 | S32As2 | 0.5 | Moderate |
| | | S32As1 | 0.6 | Moderate - High |
| Ref: 102 (Housing) | 2.1 | S45As1 | 0.4 | Moderate |
| | | S20Ds1 | 1.7 | Very High |
| Ref: 106 (Housing) ⁺ | 86.1 | S15As1 | 2.7 | Very High |
| | | S16Cs1 | 43.7 | Very High |
| Ref: 116 (Housing) | 22.8 | S20Cs1 | 22.8 | High |
| Ref: 119b (Housing) | 3.0 | S6As1 | 3.0 | Low - Moderate |
| Ref: 120 (Housing) | 0.5 | S8As1 | 0.5 | Low - Moderate |
| Ref: 130 (Housing) | 0.1 | S22As1 | 0.1 | Low |
| Ref: 134 (Housing) | 1.9 | S13Bs2 | 1.7 | Moderate |
| Ref: 136 (Housing) | 18.6 | S21As1 | 18.6 | Moderate |
| Ref: 137 (Housing) | 9.7 | S20Bs1 | 9.4 | Moderate - High |
| Ref: 138 (Housing) | 2.8 | S10As1 | 0.6 | Moderate |

⁵¹ All promoted site areas and calculations are indicative, dependent on Council data accuracy.

| Promoted Site | Total Area of Site | Sub-parcel Scenario | Area of site within Sub-parcel Scenario excluding constraints (ha) ⁵¹ | Harm Rating |
|--|--------------------|---------------------|--|-----------------|
| Ref: 150 (Housing) | 5.7 | S25As1 | 0.1 | Moderate |
| | | S26As1 | 5.6 | Moderate - High |
| Ref: 151 (Housing) | 6.3 | S20Hs1 | 6.2 | Moderate - High |
| Ref: 154 (Housing) | 0.8 | S20Fs1 | 0.8 | High |
| Ref: 159a (Housing) | 0.2 | S20Fs1 | 0.2 | High |
| Ref: 159b (Housing) | 0.6 | S20Fs1 | 0.5 | High |
| Ref: 160 (Housing) | 3.0 | S20Hs1 | 3.0 | Moderate - High |
| Ref: 163 (Housing) | 12.2 | S20Hs1 | 12.0 | Moderate - High |
| Ref: 164 (Housing) | 3.4 | S20Hs1 | 3.3 | Moderate - High |
| Ref: 164a (Housing) | 0.5 | S20Hs1 | 0.5 | Moderate - High |
| Ref: 165 (Housing) | 28.9 | S20Hs1 | 28.6 | Moderate - High |
| Ref: 166 (Housing) | 1.1 | S20Hs1 | 1.1 | Moderate - High |
| Ref: 169 (Housing) | 1.3 | S31As2 | 1.3 | Moderate - High |
| Ref: 170 (Housing) | 17.1 | S20Gs1 | 17.1 | Moderate |
| Ref: 172 (Housing) | 12.7 | S30Cs1 | 12.7 | High |
| Ref: 180 (Housing) | 113.0 | S69As1 | 49.9 | Very High |
| Ref: 180 (Housing) ⁺ | 0.1 | S31As2 | 0.1 | Moderate - High |
| Ref: 181 (Housing) | 0.4 | S31As1 | 0.4 | High |
| Ref: 182 (Housing) | 0.1 | S32Ds1 | 0.1 | Moderate - High |
| Ref: 183 (Housing) | 0.3 | S31As2 | 0.3 | Moderate - High |
| Ref: 184 (Housing) | 2.2 | S30Cs3 | 2.2 | Moderate |
| Ref: 185 (Housing) | 0.9 | S30Cs3 | 0.9 | Moderate |
| Ref: 192 (Housing) ⁺ | 2.8 | S57As1 | 0.9 | Low |
| | | S58As1 | 1.3 | Low - Moderate |
| Ref: 197 (Employment and housing) ⁺ | 100.1 | S20Es1 | 21.6 | Very High |
| | | S20Es2 | 39.3 | High |
| Ref: 200 (Housing) | 32.3 | S16As1 | 32.1 | Very High |
| Ref: 202 (Housing) | 36.6 | S4Cs2 | 7.0 | High |
| | | S4Cs1 | 29.6 | Very High |
| Ref: 203 (Housing) | 5.4 | S4Ds2 | 5.4 | High |
| Ref: 204 (Housing) | 0.4 | S20Es1 | 0.4 | Very High |
| Ref: 205 (Housing) | 0.2 | S20Es2 | 0.2 | High |
| Ref: 206 (Housing) | 0.4 | S20Es2 | 0.4 | High |
| Ref: 207 (Housing) | 0.7 | S18As1 | 0.6 | Moderate |
| Ref: 210 (Housing) | 1.0 | S46Bs2 | 0.9 | Moderate - High |
| Ref: 211 (Housing) | 4.9 | S41As1 | 0.1 | High |
| | | S41As3 | 3.3 | Moderate |
| Ref: 217 (Housing) | 24.8 | S41As1 | 23.7 | High |
| Ref: 218 (Housing) | 55.8 | S46Cs1 | 52.7 | Very High |
| Ref: 221 (Housing) | 2.5 | S46Bs2 | 2.3 | Moderate - High |
| Ref: 222 (Housing) | 10.7 | S41As2 | 10.5 | Moderate - High |
| Ref: 224 (Housing) | 3.4 | S53Hs2 | 3.4 | Moderate - High |
| Ref: 225 (Housing) | 2.4 | S51Bs2 | 2.4 | Moderate - High |
| Ref: 230 (Housing) | 3.6 | S51Bs2 | 3.6 | Moderate - High |
| Ref: 236 (Housing) | 0.9 | S46Bs2 | 0.9 | Moderate - High |
| Ref: 237 (Housing) | 0.8 | S46Bs2 | 0.8 | Moderate - High |
| Ref: 238a (Housing) | 7.8 | S59Ds1 | 7.8 | Moderate - High |
| Ref: 238b (Housing) | 6.7 | S59Ds1 | 6.6 | Moderate - High |
| Ref: 241 (Housing) | 3.3 | S46As1 | 3.2 | Moderate - High |
| Ref: 243 (Housing) | 1.4 | S46As1 | 1.4 | Moderate - High |
| Ref: 245 (Housing) | 3.7 | S59Cs1 | 0.1 | High |
| Ref: 245 (Housing) | 3.8 | S75Bs1 | 0.1 | Very High |
| Ref: 245 (Housing) | 3.7 | S60As1 | 3.6 | Low |
| Ref: 246 (Housing) | 364.4 | S51As1 | 72.7 | High |
| | | S53Gs1 | 106.4 | High |
| | | S54Bs1 | 171.7 | Very High |
| Ref: 246a (Housing) | 9.0 | S54Bs1 | 9.0 | Very High |
| Ref: 249 (Housing) | 3.6 | S64Es1 | 3.6 | Moderate - High |
| Ref: 250 (Housing) | 3.7 | S64Es1 | 3.7 | Moderate - High |
| Ref: 251 (Housing) | 3.2 | S63As1 | 0.1 | Very Low |
| | | S64Es1 | 0.5 | Moderate - High |
| | | S64Es2 | 1.9 | Moderate |
| Ref: 252 (Housing) | 3.6 | S64Es2 | 0.1 | Moderate |
| | | S64Es1 | 3.5 | Moderate - High |
| Ref: 253 (Housing) | 11.8 | S53Fs2 | 0.2 | Moderate |

| Promoted Site | Total Area of Site | Sub-parcel Scenario | Area of site within Sub-parcel Scenario excluding constraints (ha) ⁵¹ | Harm Rating |
|---------------------------------|--------------------|---------------------|--|-----------------|
| | | S53Fs1 | 11.5 | Moderate - High |
| Ref: 254 (Housing) | 0.2 | S53Fs1 | 0.1 | Moderate - High |
| Ref: 255 (Housing) | 2.4 | S64Es1 | 0.1 | Moderate - High |
| | | S64Es2 | 2.3 | Moderate |
| Ref: 257 (Housing) | 3.4 | S53Fs1 | 3.4 | Moderate - High |
| Ref: 26 (Housing) ⁺ | 24.1 | S71Bs1 | 0.6 | Very High |
| | | S71Bs2 | 6.0 | Moderate - High |
| Ref: 260 (Housing) | 7.9 | S59Cs1 | 7.9 | High |
| Ref: 264 (Housing) | 4.6 | S82Bs1 | 0.2 | Very High |
| Ref: 271 (Housing) | 4.0 | S64Gs2 | 3.9 | Moderate |
| Ref: 272 (Housing) | 1.0 | S81As3 | 1.0 | Moderate |
| Ref: 273 (Housing) | 4.0 | S64Gs2 | 3.7 | Moderate |
| Ref: 280 (Housing) ⁺ | 21.5 | S82Cs2 | 17.5 | High |
| Ref: 283 (Housing) | 9.6 | S72As1 | 2.9 | Moderate - High |
| | | S72As2 | 6.7 | Moderate |
| Ref: 284 (Housing) | 2.1 | S72Bs3 | 1.9 | Low - Moderate |
| Ref: 286 (Housing) | 0.7 | S72As2 | 0.6 | Moderate |
| Ref: 298 (Housing) | 1.9 | S53Cs3 | 1.9 | Low - Moderate |
| Ref: 306 (Housing) | 1.8 | S72Bs2 | 1.8 | Moderate - High |
| Ref: 309 (Housing) | 4.5 | S53Bs1 | 4.4 | Moderate - High |
| Ref: 310 (Housing) | 16.2 | S53Cs2 | 0.5 | Moderate |
| | | S74As1 | 13.9 | Low - Moderate |
| Ref: 312a (Housing) | 0.3 | S53Bs1 | 0.2 | Moderate - High |
| Ref: 313 (Housing) | 1.4 | S72As2 | 0.6 | Moderate |
| Ref: 314 (Housing) | 2.0 | S53Bs1 | 2.0 | Moderate - High |
| Ref: 315 (Housing) | 2.0 | S71As2 | 0.4 | High |
| | | S71As1 | 1.5 | Very High |
| Ref: 319 (Housing) | 4.0 | S64As2 | 3.9 | Moderate |
| Ref: 320 (Housing) | 0.6 | S64As2 | 0.6 | Moderate |
| Ref: 321 (Housing) | 1.0 | S64As1 | 0.9 | Moderate - High |
| Ref: 325 (Housing) | 0.2 | S53Ds2 | 0.2 | Moderate |
| Ref: 327 (Housing) | 0.6 | S53Ds3 | 0.6 | Low - Moderate |
| Ref: 328 (Housing) | 0.5 | S64Cs2 | 0.5 | Low - Moderate |
| Ref: 329 (Housing) | 1.1 | S64Cs2 | 1.0 | Low - Moderate |
| Ref: 330 (Housing) | 0.2 | S53Ds1 | 0.1 | Moderate - High |
| Ref: 330 (Housing) | 0.2 | S53Ds1 | 0.1 | Moderate - High |
| Ref: 330 (Housing) | 0.2 | S53Ds2 | <0.1 | Moderate - High |
| Ref: 335a (Housing) | 1.2 | S72As2 | 0.5 | Moderate |
| Ref: 335b (Housing) | 0.5 | S72As2 | 0.5 | Moderate |
| Ref: 338 (Housing) | 0.4 | S72As2 | 0.2 | Moderate |
| Ref: 339 (Housing) | 4.2 | S71Cs1 | 4.2 | Very High |
| Ref: 340 (Housing) | 0.3 | S71Cs1 | 0.3 | Very High |
| Ref: 343 (Housing) | 52.3 | S75Bs1 | 28.3 | Very High |
| Ref: 350a (Housing) | 2.4 | S59Cs1 | 2.4 | High |
| Ref: 350b (Housing) | 2.8 | S59Cs1 | 2.8 | High |
| Ref: 351 (Housing) | 0.2 | S59Cs1 | 0.2 | High |
| Ref: 354 (Housing) | 0.3 | S67As1 | 0.3 | Very High |
| Ref: 358 (Housing) | 3.7 | S64Ds2 | 3.5 | Moderate |
| Ref: 359 (Housing) | 4.1 | S64Ds1 | 4.1 | Moderate - High |
| Ref: 364 (Housing) | 10.2 | S75Bs1 | 10.1 | Very High |
| Ref: 365 (Housing) | 9.0 | S82Bs1 | 9.0 | Very High |
| | | S71As2 | 0.5 | High |
| Ref: 368 (Housing) | 70.9 | S71As1 | 62.9 | Very High |
| Ref: 369 (Housing) | 2.6 | S71As2 | 2.5 | High |
| Ref: 370 (Housing) | 6.8 | S71As2 | 6.6 | High |
| Ref: 376 (Housing) | 2.2 | S32Bs1 | 2.2 | Moderate - High |
| Ref: 392 (Housing) | 1.5 | S29As1 | 0.1 | Low - Moderate |
| | | S20Es2 | 1.2 | High |
| Ref: 393 (Housing) | 1.6 | S27As1 | 1.5 | Low |
| Ref: 396 (Housing) | 25.8 | S31As2 | 25.2 | Moderate - High |
| Ref: 397 (Housing) | 3.0 | S42As1 | 1.6 | Moderate |
| Ref: 401 (Housing) | 1.2 | S64Es1 | 1.2 | Moderate - High |
| Ref: 402 (Housing) | 1.2 | S58As1 | 1.2 | Low - Moderate |
| Ref: 407 (Housing) | 46.2 | S54Bs2 | 46.2 | High |
| Ref: 409 (Housing) | 0.5 | S78As3 | 0.5 | Moderate |

| Promoted Site | Total Area of Site | Sub-parcel Scenario | Area of site within Sub-parcel Scenario excluding constraints (ha) ⁵¹ | Harm Rating |
|-----------------------------------|--------------------|---------------------|--|-----------------|
| Ref: 410 (Housing) | 2.9 | S64As1 | 1.1 | Moderate - High |
| Ref: 412 (Housing) | 3.8 | S53As3 | 2.4 | Moderate |
| Ref: 413 (Housing) | 6.3 | S53Cs2 | 6.3 | Moderate |
| Ref: 417 (Housing) | 0.6 | S73As1 | 0.6 | Very Low |
| Ref: 418 (Housing) | 0.3 | S13Bs2 | 0.3 | Moderate |
| Ref: 421 (Housing) | 0.9 | S64Es1 | 0.9 | Moderate - High |
| Ref: 430 (Housing) | 2.9 | S32Fs2 | 2.9 | Moderate - High |
| Ref: 437 (Housing) | 2.6 | S53Bs1 | 2.4 | Moderate - High |
| Ref: 438 (Housing) | 0.9 | S53Cs3 | 0.6 | Low - Moderate |
| Ref: 440 (Housing) | 1.9 | S13Bs2 | 1.9 | Moderate |
| Ref: 447 (Housing) | 1.0 | S53Hs2 | 1.0 | Moderate - High |
| Ref: 454 (Housing) | 2.3 | S46As1 | 2.3 | Moderate - High |
| Ref: 458 (Housing) | 10.5 | S53Cs2 | 9.2 | Moderate |
| Ref: 463a (Housing) | 2.0 | S67As1 | 2.0 | Very High |
| Ref: 463b (Housing) | 3.4 | S67As1 | 0.2 | Very High |
| | | S72Bs3 | 3.3 | Low - Moderate |
| Ref: 463c (Housing) | 1.0 | S72Bs3 | 1.0 | Low - Moderate |
| Ref: 463d (Housing) | 4.1 | S67As1 | 0.1 | Very High |
| | | S72Bs3 | 4.0 | Low - Moderate |
| Ref: 471 (Housing) | 14.6 | S20Fs1 | 14.5 | High |
| Ref: 474 (Housing) | 0.4 | S4Ds1 | 0.4 | Very High |
| Ref: 474a (Housing) | 10.9 | S4Ds1 | 10.9 | Very High |
| Ref: 477 (Housing) | 2.0 | S53Cs2 | 2.0 | Moderate |
| Ref: 479a (Housing) | 1.3 | S72As2 | 1.3 | Moderate |
| Ref: 486a (Housing) | 3.4 | S28As1 | 0.9 | Low - Moderate |
| Ref: 486b (Housing) | 21.1 | S20Fs1 | 20.3 | High |
| Ref: 486c (Housing) | 94.1 | S20Fs1 | 93.3 | High |
| Ref: 489 (Housing) | 32.0 | S6As1 | 26.0 | Low - Moderate |
| Ref: 490 (Housing) | 0.2 | S10As2 | 0.2 | Low - Moderate |
| Ref: 492a (Housing) | 30.6 | S16Cs1 | 30.2 | Very High |
| Ref: 492b (Housing) | 6.2 | S16Cs1 | 6.2 | Very High |
| | | S15As1 | 2.8 | Very High |
| | | S16Cs1 | 42.7 | Very High |
| Ref: 493 (Housing) | 0.7 | S75Bs1 | 0.7 | Very High |
| Ref: 494 former (Housing) | 15.8 | S65As1 | 0.6 | Moderate |
| | | S59Bs1 | 15.1 | High |
| Ref: 495 (Housing) | 2.9 | S65As1 | 0.6 | Moderate |
| | | S59As1 | 2.3 | Moderate |
| Ref: 503 (Housing) | 14.2 | S46Bs1 | 11.9 | High |
| Ref: 504 (Housing) | 4.1 | S46As1 | 4.1 | Moderate - High |
| Ref: 505 (Housing) | 2.4 | S57As1 | 0.9 | Low |
| | | S58As1 | 1.4 | Low - Moderate |
| Ref: 506 (Housing) | 7.3 | S46As1 | 7.3 | Moderate - High |
| Ref: 507 (Housing) | 3.2 | S53Hs1 | 3.2 | High |
| Ref: 510 (Housing) | 23.0 | S46Bs1 | 22.9 | High |
| Ref: 512 (Housing) | 52.3 | S46Bs1 | 50.6 | High |
| Ref: 513 (Housing) | 0.2 | S41As2 | 0.2 | Moderate - High |
| Ref: 514 (Housing) | 3.9 | S54Bs1 | 3.9 | Very High |
| Ref: 515 (Housing) | 3.5 | S46Bs2 | 3.5 | Moderate - High |
| | | S46Cs1 | 2.0 | Very High |
| | | S46Cs2 | 26.0 | High |
| Ref: 520 (Housing) | 4.9 | S20Fs1 | 3.6 | High |
| Ref: 523 (Housing) | 2.4 | S20Cs1 | 0.1 | High |
| Ref: 525 (Housing) | 15.1 | S13Bs1 | 14.3 | High |
| Ref: 526 (Housing) | 22.1 | S13Bs2 | 0.4 | Moderate |
| | | S13Bs1 | 21.5 | High |
| Ref: 527 (Housing) | 21.1 | S31As2 | 21.0 | Moderate - High |
| Ref: 536 (Housing) | 23.2 | S16Ds2 | 5.8 | High |
| | | S16Ds1 | 16.7 | Very High |
| Ref: 537 (Housing) | 40.7 | S20Ds1 | 0.2 | Very High |
| | | S20Es2 | 40.0 | High |
| Ref: 537a (Housing-led mixed use) | 21.7 | S20Es1 | 21.1 | Very High |
| Ref: 544 (Housing) | 1.4 | S64Cs1 | 1.4 | Moderate |
| Ref: 546 (Housing) | 1.9 | S78As2 | 1.6 | Moderate - High |

| Promoted Site | Total Area of Site | Sub-parcel Scenario | Area of site within Sub-parcel Scenario excluding constraints (ha) ⁵¹ | Harm Rating |
|----------------------------------|--------------------|---------------------|--|-----------------|
| | | S78As1 | 0.1 | High |
| Ref: 547 (Housing) | 0.2 | S64Cs2 | 0.2 | Low - Moderate |
| Ref: 548 (Housing) | 50.8 | S69As1 | 50.2 | Very High |
| Ref: 549 (Housing) | 19.5 | S81As3 | 6.6 | Moderate |
| | | S81As1 | 12.7 | High |
| Ref: 554 (Housing) | 12.8 | S53Cs2 | 12.8 | Moderate |
| Ref: 557 (Housing) | 0.2 | S71Cs1 | 0.2 | Very High |
| Ref: 558 (Housing) | 3.8 | S64Cs1 | 3.8 | Moderate |
| Ref: 559 (Housing) | 24.4 | S68As1 | 3.8 | Moderate |
| | | S67As1 | 20.6 | Very High |
| Ref: 560 (Housing) | 19.3 | S71Cs1 | 3.3 | Very High |
| | | S71Cs2 | 15.7 | Moderate - High |
| Ref: 561 (Housing) | 4.4 | S67As1 | 0.1 | Very High |
| | | S68As1 | 4.2 | Moderate |
| Ref: 563 (Housing) | 6.9 | S53Cs2 | 6.9 | Moderate |
| Ref: 566 (Housing) | 10.7 | S71Bs2 | 10.7 | Moderate - High |
| Ref: 567 (Housing) | 1.8 | S71Cs1 | 1.8 | Very High |
| Ref: 573 (Housing) | 42.3 | S67As1 | 42.2 | Very High |
| Ref: 576 (Housing) | 8.5 | S64Gs2 | 8.4 | Moderate |
| Ref: 577 (Housing) | 38.3 | S75As1 | 38.3 | High |
| Ref: 582 (Housing) | 24.4 | S59Bs1 | 10.7 | High |
| | | S59Bs2 | 13.6 | Moderate - High |
| Ref: 585 (Housing) | 210.6 | S32Es1 | 208.1 | High |
| Ref: 591 (Housing) | 27.4 | S4Bs1 | 27.4 | High |
| Ref: 592 (Housing) | 20.9 | S4Bs1 | 20.8 | High |
| Ref: 611 (Housing) | 2.6 | S32Ls1 | 2.6 | Moderate - High |
| Ref: 613 (Housing) | 48.9 | S40As1 | 0.2 | Moderate - High |
| Ref: 613 (Housing) | 48.9 | S41Bs1 | 10.9 | High |
| | | S32Hs1 | 37.8 | High |
| Ref: 615 (Housing) | 9.2 | S32Cs2 | 7.9 | Moderate |
| Ref: 616 (Housing) | 1.7 | S32Ls1 | 1.6 | Moderate - High |
| Ref: 618 (Housing) | 2.1 | S41Bs1 | 2.1 | High |
| Ref: 624 (Housing) | 0.9 | S4Cs3 | 0.8 | Moderate - High |
| Ref: 626 (Housing) | 1.8 | S53Bs1 | 1.8 | Moderate - High |
| Ref: 627 (Housing) | 7.1 | S53Bs1 | 7.1 | Moderate - High |
| Ref: 628 (Housing) | 9.4 | S53Bs1 | 9.4 | Moderate - High |
| Ref: 629 (Housing) | 12.3 | S72As1 | 12.2 | Moderate - High |
| Ref: 630 (Housing) | 13.3 | S51Bs2 | 8.9 | Moderate - High |
| Ref: 633 (Employment or housing) | 290.5 | S32Es2 | 289.1 | Moderate - High |
| Ref: 634 (Employment) | 20.1 | S32Es2 | 0.1 | Moderate - High |
| Ref: 635 (Employment) | 3.8 | S20Cs1 | 3.8 | High |
| Ref: 643 (Employment) | 9.9 | S32Is1 | 9.8 | High |
| Ref: 644 (Employment) | 6.1 | S20Ds1 | 1.7 | Very High |
| Ref: 646a (Housing) | 34.5 | S44As1 | 29.7 | High |
| | | S44As1 | 0.3 | High |
| Ref: 646b (Employment) | 29.3 | S20Ds1 | 26.7 | Very High |
| Ref: 646c (Employment) | 8.1 | S20Ds1 | 5.5 | Very High |
| Ref: 646d (Employment) | 10.4 | S44As2 | 0.2 | Moderate - High |
| | | S44As1 | 10.2 | High |
| Ref: 647 (Employment) | 8.7 | S20Ds1 | 0.6 | Very High |
| | | S20Gs1 | 4.8 | Moderate |
| Ref: 648 (Employment) | 20.9 | S43As1 | 1.0 | Low - Moderate |
| | | S42As1 | 11.1 | Moderate |
| Ref: 649 (Employment) | 33.6 | S20Es3 | 13.2 | Moderate - High |
| | | S20Es1 | 20.3 | Very High |
| Ref: 650 (Employment) | 6.7 | S4Cs3 | 0.1 | Moderate - High |
| | | S4Cs2 | 4.0 | High |
| Ref: 651 (Employment) | 81.2 | S30Cs1 | 76.4 | High |
| Ref: 652 (Employment) | 39.6 | S46Cs1 | 0.3 | Very High |
| | | S46Es1 | 0.6 | Very High |
| Ref: 653 (Employment) | 14.2 | S46Es1 | 7.9 | Very High |
| Ref: 654 (Housing) | 84.1 | S75Bs1 | 64.0 | Very High |
| Ref: 655 (Housing) | 31.1 | S75Bs1 | 31.1 | Very High |
| Ref: 657 (Housing) | 36.3 | S59Cs1 | 36.2 | High |

| Promoted Site | Total Area of Site | Sub-parcel Scenario | Area of site within Sub-parcel Scenario excluding constraints (ha) ⁵¹ | Harm Rating |
|-----------------------------------|--------------------|---------------------|--|-----------------|
| Ref: 658 (Housing) | 2.0 | S32Bs1 | 2.0 | Moderate - High |
| Ref: 659 (Housing) | 0.7 | S4Ds2 | 0.7 | High |
| Ref: 660 (Employment) | 17.1 | S20Cs1 | 17.1 | High |
| Ref: 662 (Housing) | 8.4 | S20Hs1 | 8.3 | Moderate - High |
| Ref: 665 (Housing) | 158.5 | S32Fs1 | 140.2 | High |
| Ref: 666 (Employment or housing) | 35.1 | S48As1 | 32.2 | High |
| Ref: 669 (Employment) | 7.9 | S32Es2 | 7.8 | Moderate - High |
| Ref: 670 (Employment) | 2.0 | S32Es2 | 2.0 | Moderate - High |
| Ref: 671 (Housing) | 3.3 | S64Ds2 | 3.3 | Moderate |
| Ref: 672 (Housing) | 90.0 | S76As1 | 9.5 | Moderate |
| | | S64Fs1 | 80.5 | Moderate - High |
| Ref: 673 (Housing) | 1.4 | S82Bs2 | 1.4 | Moderate - High |
| Ref: 674 (Housing) | 14.8 | S32Ls1 | 10.1 | Moderate - High |
| Ref: 675 (Housing) | 4.5 | S32Ks1 | 4.5 | Moderate - High |
| Ref: 676 (Housing) | 33.5 | S4Ds1 | 33.5 | Very High |
| Ref: 677 (Housing) | 0.1 | S80As1 | 0.1 | Low - Moderate |
| Ref: 679 (Housing) | 0.8 | S20Fs1 | 0.7 | High |
| Ref: 682 (Housing) | 0.3 | S71As2 | 0.3 | High |
| Ref: 683a (Housing) | 21.3 | S82Cs2 | 17.0 | High |
| Ref: 684 (Housing) | 3.6 | S71As2 | 3.6 | High |
| Ref: E15a (Employment or housing) | 17.5 | S20As1 | 17.5 | High |
| Ref: E31 (Employment) | 2.5 | S44As2 | 2.5 | Moderate - High |
| Ref: E46 (Employment) | 55.7 | S32Is1 | 52.0 | High |
| Ref: E47 (Employment or housing) | 17.1 | S4Ds2 | 17.1 | High |
| Ref: E48 (Employment) | 3.8 | S4Cs1 | 3.8 | Very High |
| Ref: E49 (Employment) | 3.4 | S20Cs1 | 3.4 | High |
| Ref: E50 (Employment) | 2.8 | S6As1 | 2.7 | Low - Moderate |

*Black Country Authorities site references for cross-boundary sites within Sub-parcel scenarios in South Staffordshire.

7.8 **Table 7.3** summarises the area of land which falls within each category of harm without excluding any identified absolute constraints.

Table 7.3: Total area of land assessed at each harm rating (excluding absolute constraints)

| Harm Rating | Total Area of Land (ha) | Percentage of land |
|-----------------|-------------------------|--------------------|
| Very High | 2,541.9 | 28.7 |
| High | 3,414.6 | 38.6 |
| Moderate - High | 2,094.6 | 23.7 |
| Moderate | 537.0 | 6.1 |
| Low - Moderate | 170.1 | 1.9 |
| Low | 37.6 | 0.4 |
| Very Low | 46.6 | 0.5 |

7.9 **Table 7.4** summarises the area of land within promoted sites which falls within each category of harm (excluding any identified absolute constraints).

Table 7.4: Total area of land within promoted sites assessed at each harm rating (excluding absolute constraints)

| Harm Rating | Total Area of Land within Promoted Sites (ha) ⁵² | Percentage of land ⁵² |
|-----------------|---|----------------------------------|
| Very High | 985.30 | 27.2 |
| High | 1,571.40 | 43.4 |
| Moderate - High | 779.00 | 21.5 |
| Moderate | 197.10 | 5.4 |
| Low - Moderate | 81.00 | 2.2 |
| Low | 7.00 | 0.2 |
| Very Low | 0.60 | 0.0 |

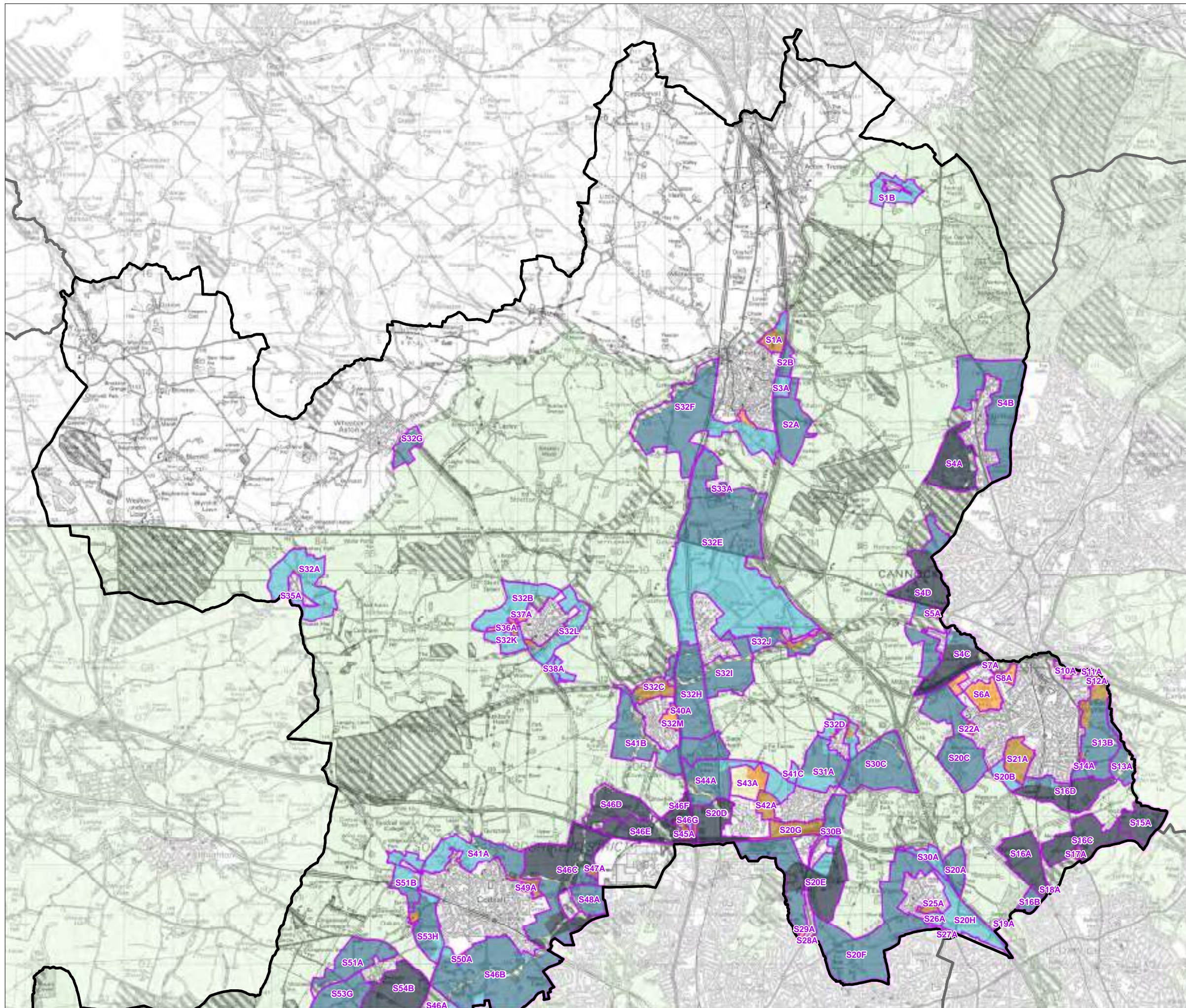
Role of Green Belt Harm Assessment

- 7.10 As outlined above, consideration of the *harm* to Green Belt that could result from the release of land for development is an essential part of establishing the exceptional circumstances for making alterations to Green Belt boundaries. However, there are other important factors that need to be considered, most notably sustainability and viability issues. Whilst the ideal would be to minimise harm to the Green Belt, it may be that the most sustainable locations for development will result in very high harm to the Green Belt. In each location where alterations to Green Belt boundaries are being considered, planning judgement is required to establish whether the sustainability benefits of Green Belt release and the associated development outweigh the harm to the Green Belt designation.
- 7.11 In light of the above, this assessment of harm to Green Belt purposes does not draw conclusions as to where land should be released to accommodate development, but identifies the relative variations in the harm to the designation.
- 7.12 The Study does not assess the cumulative impact of the release of multiple sub-parcel scenarios on the Green Belt as a whole. That lies outside the scope of this Study as there are numerous permutations of the scenarios and sites that could be considered for release.

⁵² Note: Where sites overlap, the areas of both sites have been counted within these totals.

South Staffordshire
Green Belt Study

Figure 7.3a: Harm Assessment -
South Staffordshire North



- South Staffordshire (North)
 - Other Local Authority
 - Green Belt
 - Absolute constraints
 - Stage 2 sub-parcel
- Harm rating
- Very High
 - High
 - Moderate - High
 - Moderate
 - Low - Moderate
 - Low
 - Very Low

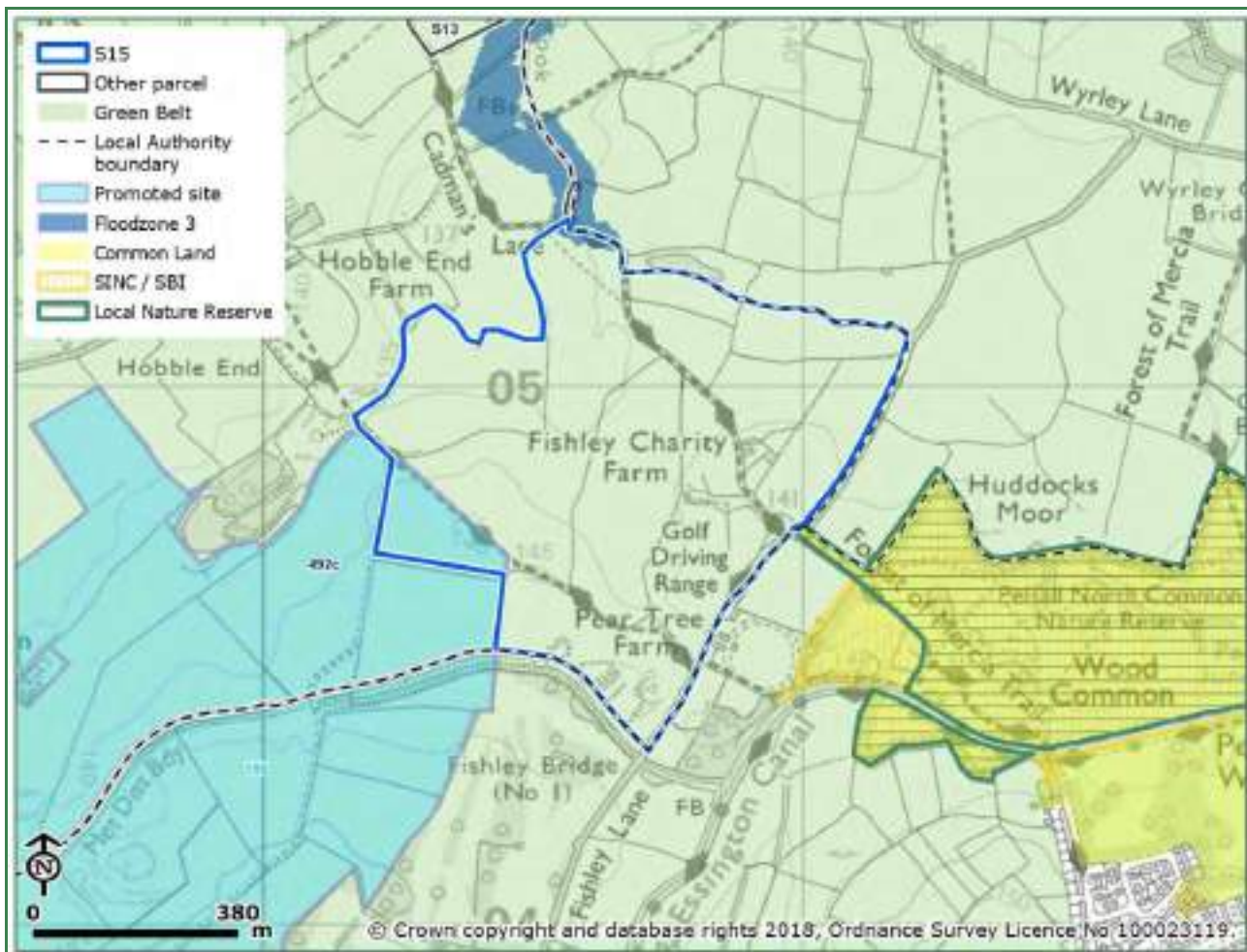
0 2 km



**SOUTH STAFFORDSHIRE GREEN BELT STUDY: APPENDIX 2
STAGE 1 CONTRIBUTION ASSESSMENTS**

Parcel Ref S15 - Fishley Park

Parcel Size: 53.2ha

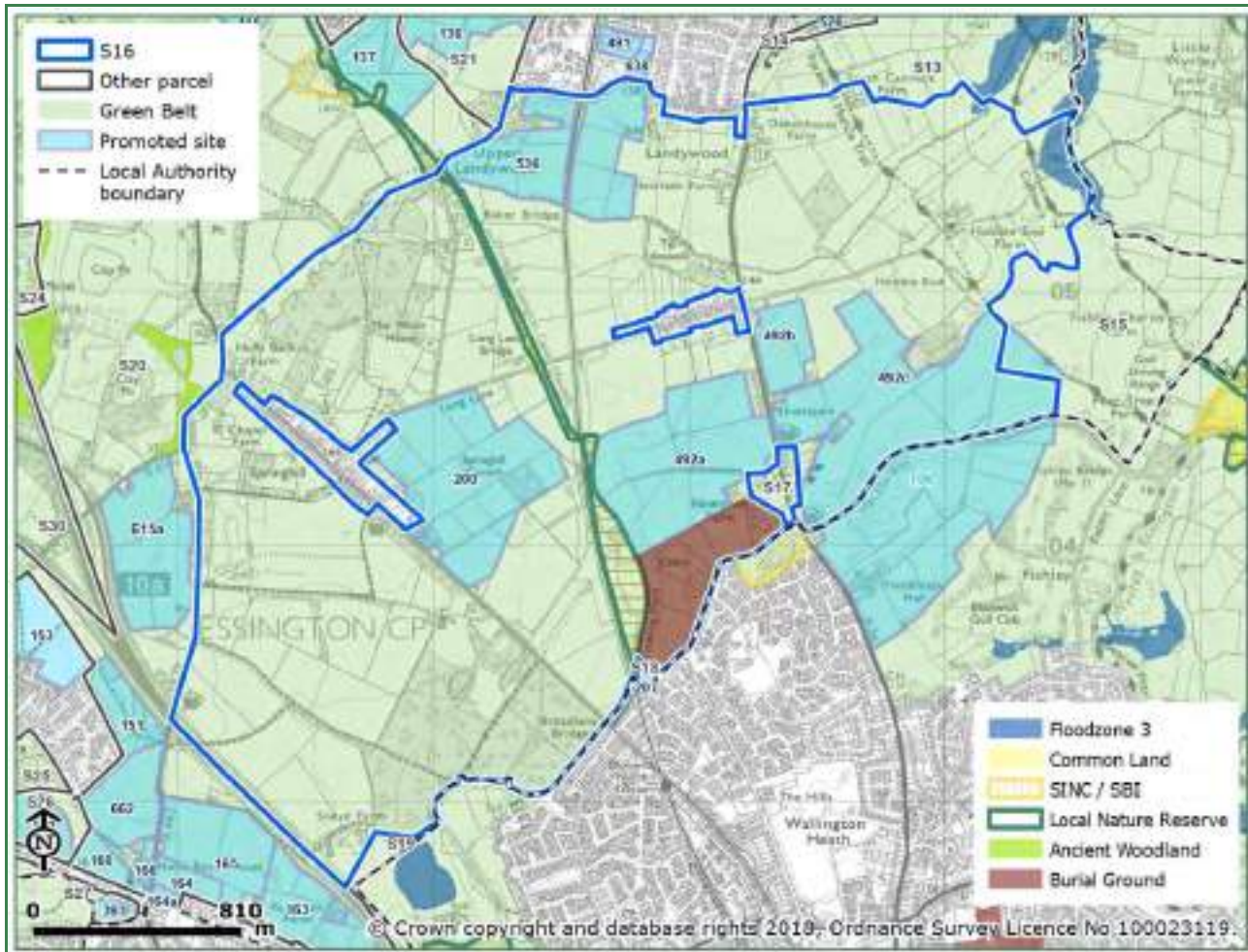


Assessment of Parcel Contribution to Green Belt Purposes

| GB Purpose | Assessment | Rating |
|---|--|-------------------------------|
| P1: Checking the unrestricted sprawl of large built-up areas | Land is close to the West Midlands conurbation, contains no urban development, and has strong openness. It retains a relatively strong relationship with the wider countryside. | Strong |
| P2: Preventing the merging of neighbouring towns | Land forms a substantial part of the gap between the neighbouring towns of Bloxwich and Great Wyrley and is essential to maintaining a sense of separation between them. | Strong |
| P3: Safeguarding the countryside from encroachment | Land contains the characteristics of open countryside (ie an absence of built or otherwise urbanising uses in Green Belt terms) and does not have a stronger relationship with the urban area than with the wider countryside. | Strong |
| P4: Preserve the setting and special character of historic towns | Land does not contribute to the setting or special character of a historic town. | Weak / No contribution |
| P5: Assist urban regeneration, by encouraging recycling of derelict and other urban land | All parcels are considered to make an equal contribution to this purpose. | Strong |

Parcel Ref S16 - Between Bloxwich and Great Wyrley

Parcel Size: 650.5ha



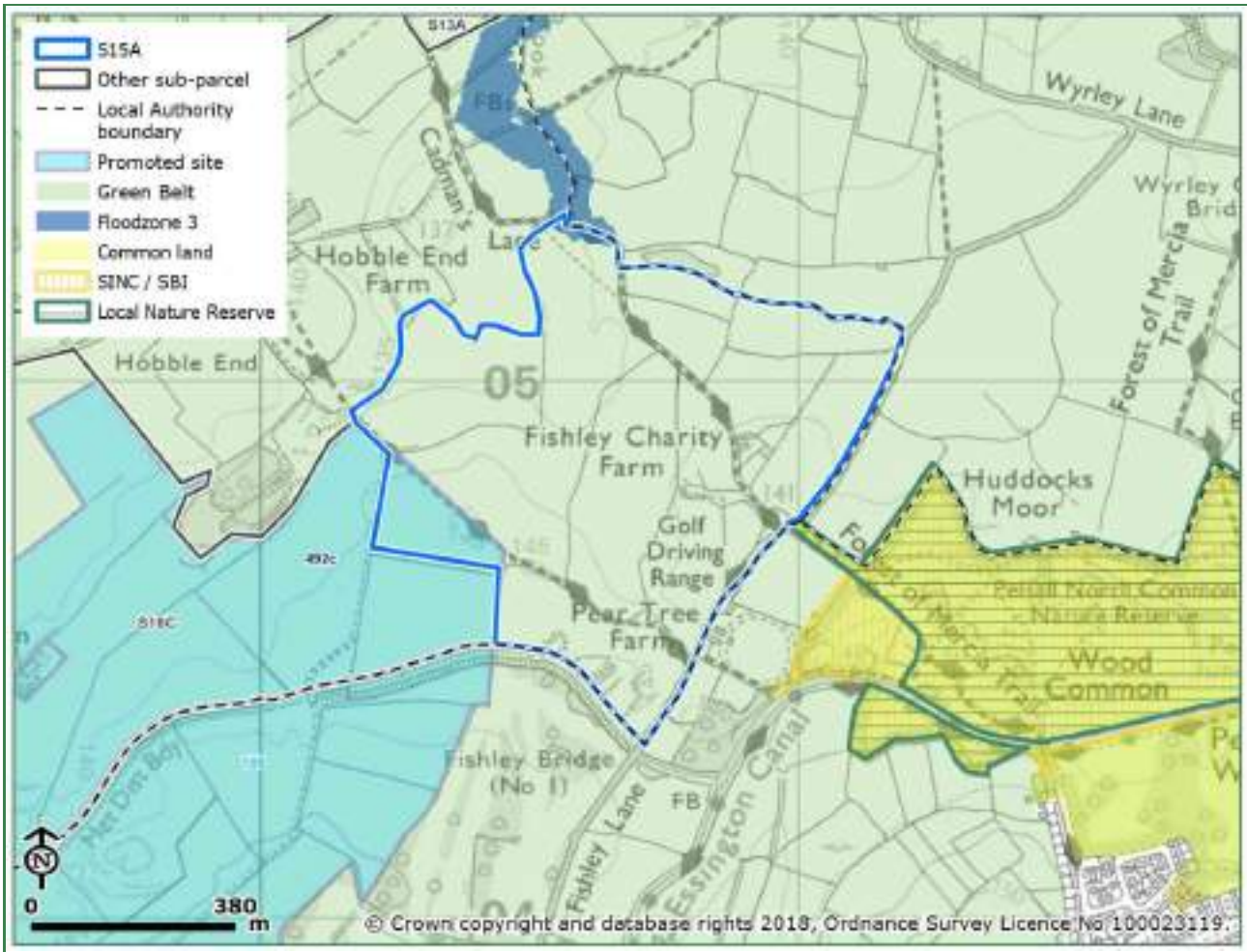
Assessment of Parcel Contribution to Green Belt Purposes

| GB Purpose | Assessment | Rating |
|---|--|-------------------------------|
| P1: Checking the unrestricted sprawl of large built-up areas | Land is adjacent or close to the large built-up area, contains very limited urban development, and has strong openness. It retains a relatively strong relationship with the wider countryside. | Strong |
| P2: Preventing the merging of neighbouring towns | Land forms a narrow gap between the towns of Great Wyrley and Bloxwich, essential to maintaining a sense of separation between them. | Strong |
| P3: Safeguarding the countryside from encroachment | Land contains the characteristics of open countryside (ie an absence of built or otherwise urbanising uses in Green Belt terms) and does not have a stronger relationship with the urban area than with the wider countryside. | Strong |
| P4: Preserve the setting and special character of historic towns | Land does not contribute to the setting or special character of a historic town. | Weak / No contribution |
| P5: Assist urban regeneration, by encouraging recycling of derelict and other urban land | All parcels are considered to make an equal contribution to this purpose. | Strong |

**SOUTH STAFFORDSHIRE GREEN BELT STUDY: APPENDIX 3
STAGE 2 HARM ASSESSMENTS**

Sub-Parcel Ref S15A - Cadman's Lane

Sub-Parcel Size: 53.2ha



Sub-Parcel Description

Farmland and golf driving range lying in the open countryside between Bloxwich/Pelsall and Great Wyrley (Cannock).



View east from footpath of Hobble End Lane.

Assessment of Parcel Contribution to Green Belt Purposes (as derived from Stage 1 Study)

| GB Purpose | Assessment | Rating |
|---|--|-------------------------------|
| P1: Checking the unrestricted sprawl of large built-up areas | Land is close to the West Midlands conurbation, contains no urban development, and has strong openness. It retains a relatively strong relationship with the wider countryside. | Strong |
| P2: Preventing the merging of neighbouring towns | Land forms a substantial part of the gap between the neighbouring towns of Bloxwich and Great Wyrley and is essential to maintaining a sense of separation between them. | Strong |
| P3: Safeguarding the countryside from encroachment | Land contains the characteristics of open countryside (ie an absence of built or otherwise urbanising uses in Green Belt terms) and does not have a stronger relationship with the urban area than with the wider countryside. | Strong |
| P4: Preserve the setting and special character of historic towns | Land does not contribute to the setting or special character of a historic town. | Weak / No contribution |
| P5: Assist urban regeneration, by encouraging recycling of derelict and other urban land | All parcels are considered to make an equal contribution to this purpose. | Strong |

Assessment of Harm From Release of Land within Sub-Parcel

| Scenario | Size (ha) | Rating |
|---|--------------|------------------|
| S15As1 Release of any land within the sub-parcel | 52.99 | Very High |

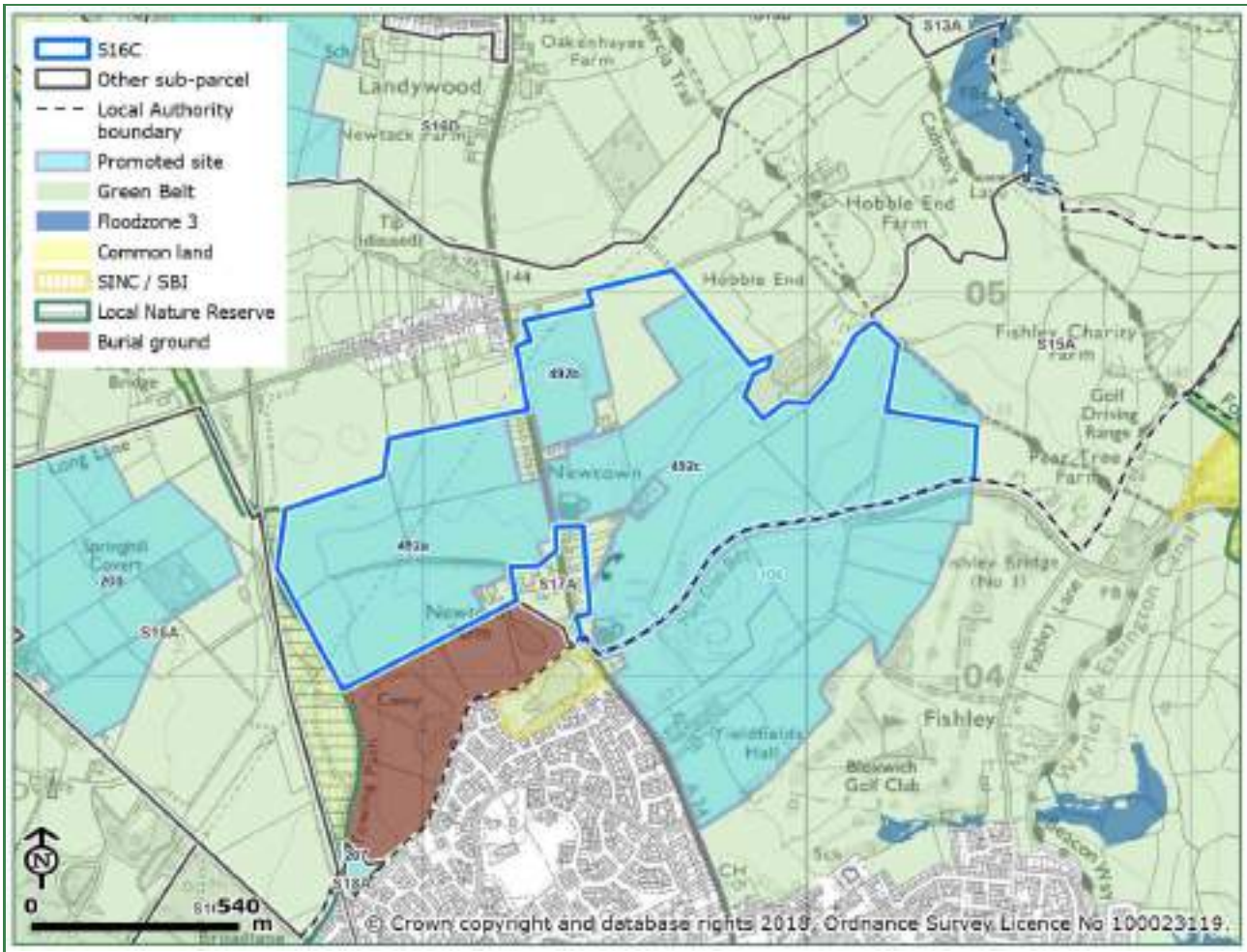
List of Sites Within the Scenario

Ref: 106 (Housing); Ref: 492c (Housing)

The sub-parcel makes a strong contribution to preventing sprawl of the West Midlands conurbation, to maintaining the separation between the neighbouring towns of Bloxwich and Great Wyrley, and to preventing encroachment on the countryside. The sub-parcel lies close to, but not adjacent to, the settlement edge of Bloxwich and lies in the gap between the latter and Great Wyrley. It is surrounded by open countryside on all sides and has strong spatial openness. Any release of land here as an extension of the settlement edge would significantly weaken the integrity of surrounding areas of Green Belt by significantly expanding the urban edge into the countryside, and threatening the fragile gap between the West Midlands conurbation and the Cannock built up area.

Sub-Parcel Ref S16C - Newtown

Sub-Parcel Size: 91.9ha



Sub-Parcel Description

Farmland and washed-over housing development on the northern edge of Bloxwich, bisected north-south by Stafford Road and bound to the west by the Wyrley and Essington Canal.



View looking north across the west of the sub-parcel.

Assessment of Parcel Contribution to Green Belt Purposes (as derived from Stage 1 Study)

| GB Purpose | Assessment | Rating |
|---|--|-------------------------------|
| P1: Checking the unrestricted sprawl of large built-up areas | Land is adjacent or close to the large built-up area, contains very limited urban development, and has strong openness. It retains a relatively strong relationship with the wider countryside. | Strong |
| P2: Preventing the merging of neighbouring towns | Land forms a narrow gap between the towns of Great Wyrley and Bloxwich, essential to maintaining a sense of separation between them. | Strong |
| P3: Safeguarding the countryside from encroachment | Land contains the characteristics of open countryside (ie an absence of built or otherwise urbanising uses in Green Belt terms) and does not have a stronger relationship with the urban area than with the wider countryside. | Strong |
| P4: Preserve the setting and special character of historic towns | Land does not contribute to the setting or special character of a historic town. | Weak / No contribution |
| P5: Assist urban regeneration, by encouraging recycling of derelict and other urban land | All parcels are considered to make an equal contribution to this purpose. | Strong |

Assessment of Harm From Release of Land within Sub-Parcel

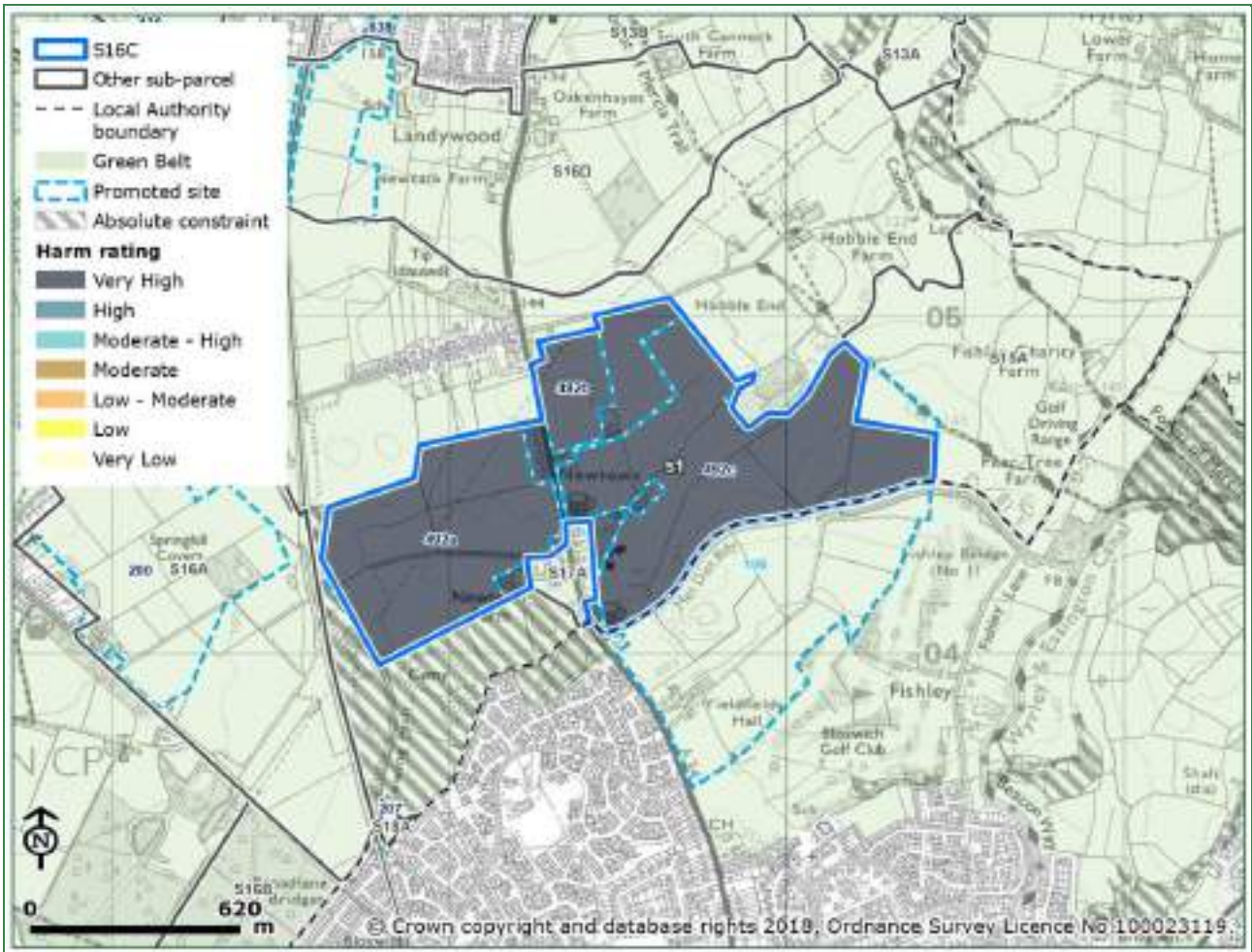
| Scenario | Size (ha) | Rating |
|---|--------------|------------------|
| S16Cs1 Release of any land within the sub-parcel | 91.79 | Very High |

List of Sites Within the Scenario

Ref: 106 (Housing); Ref: 492a (Housing); Ref: 492b (Housing); Ref: 492c (Housing)

The sub-parcel makes a strong contribution to preventing sprawl of the West Midlands conurbation at Bloxwich, to maintaining the separation between the neighbouring towns of Bloxwich and Great Wyrley, and to preventing encroachment on the countryside. The sub-parcel is close to but not adjacent to the settlement edge, has a strong relationship to the open countryside, and could only form an urban extension of the urban edge of Bloxwich if released in conjunction with neighbouring sub-parcel S17A and some of the land to the south lying within the neighbouring Black Country authority. However releasing land in this sub-parcel would significantly weaken the integrity of surrounding Green Belt land by narrowing the fragile gap between neighbouring towns and containing existing areas of Green Belt to the southeast and southwest of the sub-parcel.

Harm Ratings Overview Map of Land within Sub-Parcel



APPENDIX 6
Landscape, Visual and Green Belt Appraisal (December 2019)

APPENDIX 7
Review of Sustainability Appraisal (December 2022)

Land at Yieldfields, Bloxwich

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

December 2022

Land at Yieldfields, Bloxwich

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

Prepared on behalf of:

L&Q Estates

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

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1.0 Introduction

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

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

2.0 Review of the 2022 Reg 19 SA

Purpose of Review

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

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

Review Summary

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

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

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

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

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

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

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

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

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

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

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

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

Conclusion

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

**APPENDIX 1:
SUSTAINABILITY APPRAISAL COMPLIANCE REVIEW**

TABLE 2.1: SUSTAINABILITY APPRAISAL COMPLIANCE REVIEW

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

TABLE 2.1: SUSTAINABILITY APPRAISAL COMPLIANCE REVIEW

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

TABLE 2.1: SUSTAINABILITY APPRAISAL COMPLIANCE REVIEW

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

TABLE 2.1: SUSTAINABILITY APPRAISAL COMPLIANCE REVIEW

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

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

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| | <p>Appendix B of the 2022 Reg 19 SA outlines the SA Framework, including the SA Objectives, decision making criteria and indicators. The SA Framework (comprising the Sustainability Objectives agreed during scoping) has been used to assess the SSLPR's reasonable alternative sites including housing, employment and Gypsy and Traveller sites (Chapter 5 of the 2022 Reg 19 SA summarises the findings, with full assessment and detailed commentary per SA objective shown in Appendix F: New and Amended RA Site Assessments) and the Strategic Policies and Development Plan Policies (summarised in Chapter 6, and Appendix I: Policy Assessments that provides detailed assessment and commentary) for likely significant effects on the environment.</p> <p>The SA process has appraised each of the options against the twelve Sustainability Objectives using a matrix with a colour coded key, a method often used for the assessment of site options in SEAs, to make the comparison of the positive and negative sustainability aspects of a site clear and consistent. A set of appraisal questions are used for each objective which ensures the SA considers each effect within clear parameters.</p> <p>The number of iterations of the SA to date and those planned shows that the process is iterative and that there has not been a foregone conclusion throughout. For the most part, the discussion around alternative policies is clear and provides helpful clarity on how the Plan will form a reasonable strategy in terms of environmental impact and steering growth towards sustainable development. Figure 2.2 of 2022 Reg 19 SA sets out the Local Plan process and Section 2.3 sets out a timeline of the stages of the SSLPR and SA process undertaken to date and Section 5 summarises the types of alternatives considered in the SA, which includes a full range of options.</p> <p>The Issues and Options SA Report assessed five options for levels of residential growth, two options for Gypsy and Traveller growth, three options for employment growth, six options for residential distribution, four options for employment distribution and 34 options for policies to be included in the SSLPR. The Spatial Housing Strategy and Infrastructure Delivery SA Report then assessed the seven reasonable alternative spatial options considered for the broad distribution of new housing growth in the Plan area. The Issues and Options SA Report, at that stage, concluded that Spatial Options A (Maximise Open Countryside release), B (Prioritise Green Belt land release in areas of lesser Green Belt harm) and C (Carry forward existing Core Strategy strategic approach to distribution) would be expected to be the worst-performing options, as the proposed development under these three options could have potentially resulted in more likely adverse impacts and less positive impacts than the other options. The negative impacts resulting from these options were identified as relating to directing a higher proportion of housing to more rural locations in South Staffordshire with limited access to essential services, such as education, employment and health centres. The 2021 Reg 18 (III) SA acknowledges that it was difficult to differentiate between the sustainability performance of Spatial Options D (Maximise sites in areas identified in the Greater Birmingham Housing Market Area (GBHMA) Strategic Growth Study), E (Address local affordability issues and settlements with the greatest needs), F (Give first consideration to Green Belt land which is previously developed or well-served by public transport) and G (Infrastructure-led development with a garden village area of search beyond the plan period), as the proposed development under all of these options would be likely to result in the same or similar sustainability impacts. The identified likely positive impacts of these spatial options were due to the provision of housing need in locations where the majority of new residents would have good access to education, employment opportunities and sustainable transport options, including rail and bus services. Spatial Option G was selected as the best-performing option, with the SA concluding that the proposed development under this option would be likely to result in the greatest positive sustainability impacts, in particular in regard to access to education and employment. Based on Option G of the Spatial Options, the 2021 Reg 18 (III) SA assesses the reasonable alternatives considered by the Council in the Preferred Options process. In total, 317 sites (preferred allocations are identified for housing, employment and Gypsy, Traveller and Travelling Showpersons sites) and 51 policies (eleven Strategic Policies and 40 direction of travel Development Management policies) have been assessed against the SA Framework. The 2022 Reg 19 SA includes an assessment of 58 additional reasonable alternative sites, identified by the Council since the previous Regulation 18 (III) SA. Of these 58 sites:</p> <ul style="list-style-type: none">• 39 are new sites that have been identified since the preferred options stage and have been considered in addition to the 317 sites assessed within the Regulation 18 (III) SA; and• 19 are amended version of sites previously assessed in the Regulation 18 (III) SA Report. The amendments relate primarily to boundary alterations whereby landowners or site promoters have re-submitted their sites. <p>Section 4 of the 2022 Reg 19 SA sets out the methodology for determining the significance of reasonable alternatives (a combination of the sensitivity of a receptor and magnitude of change) and Appendix D of the 2022 Reg 19 SA provides additional context to Chapter 4 of the main Regulation 19 SA Report regarding the topic specific methodologies and assumptions used to assess policies, proposals and reasonable alternatives. As per the previous SA, this section could be better at linking effect significance to the need for subsequent mitigation. It would also be useful to understand what this would subsequently mean for policies. The Issues and Options SA Report refers to options for large locations which have been promoted through the Call for Sites and the GBHMA Strategic Growth Study and states that the Council has had numerous smaller sites suggested through the Call for Sites exercise, which reflect the Council's SHELAA. The 2022 Reg 19 SA could better outline the process behind which the seven spatial options in the Spatial</p> |
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| | <p>Housing Strategy and Infrastructure Delivery SA were developed from the growth/distribution options presented in the Issues and Options SA Report, given that the process should be iterative. The 2022 Reg 19 SA does not explain the process of the selection of the reasonable alternatives in terms of giving references to the sources that the 317(+58) sites selected for assessment were derived from, which could include consultation with statutory consultees, stakeholders and the general public in response to consultation events as well as through Call for Sites / SHELAA or on an ad-hoc basis. The SA should detail the reasons that sites were filtered out at the initial first stage assessment and references should be given to the evidence base supporting alternatives (e.g., Call for Sites).</p> <p>Appendix H of the 2022 Reg 19 SA sets out the outline reasons for selection and rejection of all reasonable alternative sites considered throughout the SA process, provided by SSDC. The 2022 Reg 19 SA should detail the source of these sites, for transparency, as above. There are no equivalent tables for the selection/rejection of policy alternatives. The 2022 Reg 19 SA should provide justification for the selection of the preferred policies in light of the reasonable alternatives identified and appraised, which could be related to overarching local and national objectives, baseline conditions and predicted pressures, and should also note where no reasonable alternatives were identified. It would be helpful to outline whether any options submitted to the Council in the assessment of initial options identified during the early phases of the development of the SSLPR, such as through spatial / growth assessments, were excluded and not considered to be reasonable alternatives at this stage in the Plan-making process and not taken forward and the reasoning behind this, particularly if this was due to sustainability reasons or not. The 2022 Reg 19 SA should explain the selection of the reasonable site and policy options from those initially considered and appraised and provide the Council's justification for the exclusion of previous options and the decisions made. It would be helpful if the SA outlined whether the SA team were involved in this process early on, perhaps via workshops, reviews of the alternatives, and input into giving reasons for why other options were considered to be not reasonable. The 2022 Reg 19 SA should include any collaboration that the SA team had with the SSLPR team and the degree to which they inputted to refining options to be included in the next SSLPR consultation and to be tested through SA. The 2022 Reg 19 SA should outline any initial high-level appraisal that may have been undertaken of the sites, for example at the initial first stage assessment, based on designations and/or subjective assessment and explain whether the considered list of alternatives was initially reviewed by the SA team to ensure that the relevant high level, key factors from the SA were being considered and refine the alternatives prior to an SA being carried out of the initial alternatives. If any site visits and desk-based research were undertaken using existing information this should also be outlined.</p> <p>As above, Spatial Strategy Option G is the option selected and bought forwards from the Spatial Housing Strategy and Infrastructure Delivery SA Report to the 2022 Reg 19 SA of preferred options. Under Option G, just 13.5% of housing is directed as an urban extension to the northern edge of the Black Country conurbation, with development primarily focused in greenbelt areas to the west. Under Option F, 27% of housing is focused as an urban extension to the northern edge of the Black Country conurbation, with less proposed new development in the greenbelt and rural areas than Option G. The SA assessments results for Option F and Option G are very similar, with the only difference being that Option F is given a minor positive (+) score for SA Objective 12 Economy and Employment and Option G is given a major positive (++) score for SA Objective 12.</p> <p>It is unclear why the scores vary for SA Objective 12, given that Option F has a greater focus on providing housing in proximity to existing development and employment opportunities. For example, at Bloxwich, Landywood, Shortheath, Ashmore, Wednesfield (and the University of Wolverhampton), the Hilton Main Industrial Estate to the south of Featherstone and the M54, as well as providing high connectivity (including via public transport) from these to Willenhall, Walsall and Wednesbury further to the south, all which enable access to a wide range of jobs and large commercial and industrial sites, more so than the more rural areas proposed for development in Option G. Option F would provide more development closer to the 'ROF strategic employment site Featherstone', which is mentioned in Section 5 - Spatial Option D – which says that a single urban extension would be accommodated in the area to the north of the Black Country conurbation (in the i54/ROF Featherstone corridor) and proposes 13.5% of housing here. This is less than that proposed in Option F to the north of the Black Country conurbation, however the benefits of this employment site are not mentioned when discussing Option F, and it is unclear why this is. There are also railway stations within this area, including Bloxwich, Bloxwich North and Landywood, which would allow accessible, sustainable travel to employment opportunities further afield, including into Birmingham. Therefore, the scoring for SA Objective 12 is not clear and should be better justified or reconsidered. The objectivity and parity of the assessment when assigning scores could be questioned. It is considered that Option F should score more positively for SA Objective 12, in which case Option G and Option F should score the same in the SA assessments, and therefore all site alternatives based on Spatial Strategy Option F should be considered in the 2022 Reg 19 SA. Section 5.4.17 of the 2022 Reg 19 SA states that the likely positive impacts of these spatial options in the spatial housing options in the Spatial Housing Strategy and Infrastructure Delivery SA Report related to the provision of housing need in locations where the majority of new residents would be expected to have good access to education, employment opportunities and sustainable transport options, including rail and bus services. However, Spatial Option G was identified as the best performing option, as the proposed development would be likely to result in the greatest positive impacts in terms of sustainability, in particular regard to access to education and employment. The 2022 Reg 19 SA should explain why these two SA objectives appear to be prioritised. In addition, as set out above, it is considered that the</p> |
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| | <p>scoring for SA Objective 12 should be higher for Option F, which suggests that all reasonable alternatives in the proposed urban extension under Spatial Strategy F have been missed off and not properly been considered going forwards.</p> <p>It is also unclear why Option F is given the same negative scoring as Option G for SA Objectives 1 Climate Change Mitigation, 3 Biodiversity and Geodiversity, 4 Landscape and Townscape, 5 Pollution and Waste (Air Quality), 6 Natural Resources (Agricultural Land) and 9 Cultural Heritage, given that Option G directs housing development to more open, greenfield, agricultural land in areas with poor accessibility to sustainable transport options and facilities. For example, in Option G, housing is proposed at Brewood, Perton, Pattingham, Kinver, Swindon and Wheaton Ashwood, primarily all of which are relatively isolated villages surrounded by agricultural land, as opposed to an existing conurbation. Pattingham is approximately 10km from the nearest largest provision of transport and facilities (Wolverhampton). With only small villages in their immediate surrounding area and few facilities nearby, development in this spatial strategy would therefore likely require all new residents to use cars to access these facilities, rather than more sustainable modes of transport such as public transport, walking or cycling, which would worsen impacts on air quality. The villages have limited GP and dentist provision which would have negative implications for social infrastructure and the health and wellbeing of the population. Motte Meadows NNR lies 850m north west of Wheaton Aston. Given the sensitivity of this site, it is anticipated that negative impacts, for example from recreation pressure, would be likely from development in proximity. Therefore, it is accepted that impacts on the above SA Objectives would be negative for Option G. In contrast, Option F does not propose housing in these locations and instead directs a large percentage of housing to an urban extension surrounded by existing development and urbanised areas, with accessibility to the public transport network and proximity to local facilities and amenities including schools, healthcare, education, leisure and green space. This would encourage more sustainable forms of transport with lesser impacts on air quality, climate change and provide better benefits for the health and wellbeing of the community. It is therefore considered that Option F should score more positively than Option G for the above SA Objectives. Many of the locations listed above are located in a Source Protection Zone (e.g. Perton, Pattingham, Swindon, Kinver) where housing is proposed in Option G and could therefore increase the risk of groundwater contamination. Section 3.16.5 of the Issues and Options SA (Residential spatial distribution: Option B) states that smaller scale development at each of these locations would help to ensure that any contamination events are relatively limited. With more housing in Option G of the Spatial Housing Strategy and Infrastructure Delivery SA Report focused in these locations, then contamination would presumably be more likely. Similarly, surely Option F should score more positively than Option C in the Spatial Housing Strategy and Infrastructure Delivery SA Report (Section 5) in which 100% of development in the plan period would occur in the district's rural villages. However, Option F scores the same as Option C for SA Objectives 1 Climate Change Mitigation, 3 Biodiversity and Geodiversity, 4 Landscape and Townscape and 6 Natural Resources, which raises questions around the thoroughness and justification for scoring.</p> <p>Option F and Option G are given the same score (minor positive +) for SA Objective 10 Transport and Accessibility. Section 8 of the Spatial Housing Strategy and Infrastructure Delivery SA Report - Option F – stresses the aim of this spatial strategy to allocate sites in locations with the best public transport links and opportunities to expand onto previously developed land. The strategy identifies that sites on the fringes of existing settlements (e.g. the Black Country) offer public transport links in the closest proximity to higher order service centres in these areas. The aim of Spatial Option F is focused on giving first consideration to <i>“land which has been previously-developed and/or is well-served by public transport”</i>. Therefore, it remains unclear why Option F scores the same for SA Objective 10 as Option G, rather than better, and raises questions around the robustness of the scoring. Given the reasoning outlined above it is also unclear how this conclusion is considered reasonable, due to the proposed housing in Option F being more sustainably connected. In the Spatial Housing Strategy and Infrastructure Delivery SA Report, Option G is said to <i>“reflect local infrastructure opportunities”</i>, however based on the reasons outlined above, it is argued that Option F's key focus on the urban extension to the northern edge of the Black Country conurbation in proximity to railway stations and existing facilities makes Option F primarily more aligned with local infrastructure. Option F clearly promotes the use of sustainable infrastructure, whereas Option G includes a proposed urban extension along the A449 corridor, which does not promote the use of sustainable travel opportunities. This is particularly relevant seeing as Table G.3.1 in Appendix G of the 2022 Reg 19 SA explains that a 'Climate Change Adaptation and Mitigation' (CCAM) study (AECOM, October 2020) has been undertaken to inform the development of energy and sustainability policies across Staffordshire and the eight constituent Local Authorities. The study found that 53.8% of South Staffordshire's energy is sourced from petroleum products and indicates that reducing the need to travel and promoting sustainable transport options could make a substantial contribution to reducing greenhouse gas emissions. The 2022 Reg 19 SA maintains that the spatial strategy aims to locate development primarily where new residents would have better access to existing services and facilities and access to sustainable transport, including railway stations, where possible. Like the previous iteration, the 2022 Reg 19 SA says that this approach has the potential to reduce greenhouse gas emissions in comparison with an approach which requires a more dispersed pattern of development. The reasonable alternatives identified within the SSLPR more dispersed pattern of development set out in Option G, compared to Option F, it remains unclear how the option selection process aligns with this.</p> <p>It is unclear as to how the assessment at the Issues and Options SA stage has informed the assessments in the Spatial Housing Strategy and Infrastructure Delivery SA Report and whether actually, the best option has been selected to be taken forwards through</p> |
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| | <p>the SA process or not. Section 3.16.5 of the Issues and Options SA Residential Spatial Distribution: Option B (rural housing growth) highlights that development delivered towards rural locations where the air quality is likely to be better than air quality in larger settlements and urban areas could risk worsening air quality (SA Objective 5) and further identifies that development at a large number of greenfield sites would be expected to result in a net loss of agriculturally and ecologically valuable soils (a significant majority of soils in the District are Grades 2 and 3 soils, and therefore it's likely that this would result in a net loss of Best and Most versatile (BMV) soils. Section 3.17 of the Issues and Options SA Residential Spatial Distribution: Option C for housing spatial options - scores positively for SA Objectives 1 Climate Change Mitigation, 2 Climate Change Adaptation, 8 Health and Wellbeing, 9 Cultural Heritage, 10 Transport and Accessibility and only minor negative for SA Objective Landscape and Townscape. This option proposes small-scale urban extensions adjacent to the neighbouring urban areas which South Staffordshire borders. The SA explains that much of the unmet needs in the GBHMA which South Staffordshire sits within come from the urban areas of Birmingham and the Black Country. Therefore, sites adjacent to the urban areas which neighbour the district offer a sustainable option to deliver housing supply to meet unmet housing needs. It may also offer an opportunity to create housing sites in locations which 'round off' an existing urban edge, minimising encroachment of the urban area into the green belt. Furthermore, the SA states that by directing housing sites to locations adjacent to existing towns and cities north and east of South Staffordshire, this would be likely to help ensure that new residents have excellent access to public transport links and the PRoW network, helping to reduce greenhouse gas emissions caused by road transport increases. In addition, adverse impacts on sensitive biodiversity designations will be avoided and this strategy would locate sites adjacent to existing residential development which would be in keeping and therefore unlikely to alter the local character or setting of heritage assets. Section 3.18 of the Issues and Options SA Residential Spatial Distribution: Option D (larger urban extensions on the fringe of neighbouring urban areas) is given similar scores to Option C above and states that three known employment led sites for this option would be situated in close proximity to railway stations. The above can be compared to Section 3.20 of the Issues and Options SA Residential Spatial Distribution: Option F, which looks to intensify development within the existing village development boundaries. This options scores a lot worse for most SA Objectives. Spatial Option G was selected as the best-performing option, with the SA concluding that the proposed development under this option would be likely to result in the greatest positive sustainability impacts. Given the above, which seems to support the principles of development north of the Black Country conurbation as set out in Spatial Option F more so than Option G, it is unclear how this conclusion was reasonably reached. The above raises questions as to whether the best / all alternatives have been appraised in the 2022 Reg 19 SA.</p> <p>An appraisal was undertaken in the 2021 Reg 18 (III) SA of the potential development site 'Land at Yieldfields, Bloxwich', it is clear that a) Bloxwich justifiably represents a sustainable location for housing and b) Bloxwich should be included within any proposed site allocations within the SSLPR based on its sustainability credentials. The site Land at Yieldfields, Bloxwich is suitably located in proximity to local facilities, public transport, employment opportunities and green spaces, and will add to the current services available in the area through the provision of approximately 900 homes, a primary school, public open space and recreational opportunities and allotments. The closest bus stops are located 650m from the site, whilst the closest rail station is located 1.8km from the site; both are easily accessible via the local road and pedestrian networks, reducing the reliance on private vehicular access, and resultant emissions. There are also several PRoW in proximity of the site which future development could connect with in order to improve sustainable accessibility and connectivity to the wider area. The site has the potential to retain and enhance elements of the landscape, green infrastructure network and pedestrian and cycling routes in the existing and new community, providing benefits in relation to several objectives, including climate change mitigation and adaptation, biodiversity, health and wellbeing and economy and employment. Enhancement of the green infrastructure network will also provide benefit to the local Green Belt, by further supporting barriers to urban sprawl, and biodiversity features onsite through the provision of enhanced habitat and foraging provision. Further afield, statutory and non-statutory ecological designations outside of the site footprint are not expected to be adversely affected by the future development due to their distance from site, and intervening development. The site presents the opportunity to contribute to green corridors in the area, linking up networks of green spaces, including the canal corridor to the west. The cumulative beneficial impacts of these points altogether should also be assessed. The above is contrasted to those reasonable alternative sites selected in the 2022 Reg 19 SA based on Option G of the Spatial Housing Strategy and Infrastructure Delivery SA Report, including those sites at Pattington, Kinver, and other more rural locations.</p> <p>Appendix 2 of the 2021 Reg 18 (III) SA demonstrates that Land at Yieldfields, Bloxwich scores considerably better (more positively) than Policy SA3: Strategic development location: Land north of Linthouse Lane which has been identified in the 2021 for major housing growth, for the reasons outlined above. Land north of Linthouse Lane is awarded just four positive scores against the 12 SA Objectives. Land north of Linthouse Lane does not have the benefit of being within close proximity to a railway station, with the nearest being Bloxwich North, located over 5km to the east. Therefore, new residents would likely rely heavily on private car use for means of transport to access employment and community facilities, increasing emissions and effects on climate change and health. Land north of Linthouse Lane is given a score of uncertain for SA Objective 1 Climate Change Mitigation, however given the above we consider this should be given a negative score due to the lack of sustainable transport options. Land north of Linthouse Lane is relatively isolated in terms of existing green spaces, and it is unclear how any proposed green infrastructure would link with existing networks to create meaningful corridors and connections for the benefit of biodiversity habitats as well as human health and</p> |
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| | | <p>wellbeing. The reasons put forwards for development at Land north of Linthouse Lane include that this location is well connected to the Black Country urban area which means residents will have good access to services and employment opportunities in the adjacent towns and cities. Land at Yieldfields, Bloxwich is closer to the nearest Town Centre (Bloxwich) than Land north of Linthouse Lane is to the nearest large hub (Wolverhampton, approximately 4km southwest of Land north of Linthouse Lane). Given the scoring for Land at Yieldfields, Bloxwich which demonstrates that this site achieves the above and scores better against the SA Objectives, it remains unclear why this site has not been included within the SA as a reasonable alternative for development. Therefore, the objectivity and parity of the assessment when assigning scores could be questioned. It is concluded that there are more suitable sites within the Plan area that have not been adequately considered or included for allocation when it is clear from this review that the SSLPR should prioritise development in such locations.</p> <p>Upon undertaking assessments of potential strategic locations, the SA should consider design measures such as the creation of pedestrian and cycling infrastructure, green space, future proofing to increase mitigation of and adaptation to climate change (for example, co-location of uses to reduce car dependence, the Future Homes Standard, embedding green infrastructure to encourage healthy lifestyles, active travel, biodiversity gain and natural cooling and shading) and the standard mitigation measures such as the implementations of CEMP, in accordance with appropriate legislation and best practice for development sites, which would mitigate construction effects from noise, air quality and traffic and minimise the likelihood of significant adverse effects arising. The SA process should be iterative so that as further information becomes available, a more detailed appraisal is undertaken, which should have been brought forward at the Regulation 19 stage. A whole Plan assessment and the cumulative effects (including beneficial effects) of the allocations and policies altogether should also be considered when assessing the sustainability of the options.</p> <p>The concluding sections of the 2022 Reg 19 SA could be stronger, for example by better setting out the selected, preferred options. It could be made clearer how the SA assessments were used to decide the preferred options, for example, was this based on the number of positive verses negative scores? Emphasis should be given to the reasons for selecting the preferred options based on the impacts on the topics in the SA Objectives.</p> <p>Section 4 of the 2022 Reg 19 SA sets out the assumptions, uncertainties and limitations of predicting effects, including the reliance on expert judgement, the influence on a range of factors such as the design and success of mitigation measures, ensuring alternatives were appraised consistently and reliance on the best available information, including that provided by the Council and information that is publicly available. Appendix D of the 2022 Reg 19 SA describes the assumptions that were made for specific topics of the SA Objectives Assessments, to ensure that assessments are consistent. The 2022 Reg 19 SA states that for the assessment of development proposals, up-to-date ecological surveys and/or landscape and visual impact assessments have not been available. It should be clarified when these will be available and where they can be accessed, for transparency.</p> |
| <p>9. A description of the measures envisaged concerning monitoring in accordance with regulation 17.</p> | | <p>The 2022 Reg 19 SA includes a Chapter specific to monitoring, in accordance with Regulation 17 of the SEA regulations that state that <i>"the responsible authority shall monitor significant effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able undertake appropriate remedial action"</i>.</p> <p>The 2022 Reg 19 SA identifies the indicators for each of the SA Objectives used in the SA process, the scale and frequency in which they will be measured and topic-specific targets.</p> <p>It would be useful if the current trends for each of the monitoring indicators were detailed.</p> |
| <p>10. A non-technical summary of the information provided under paragraphs 1 to 9.</p> | | <p>The 2022 Reg 19 SA includes a Non-Technical Summary (NTS), as separate from the main body of the report (Volume 1 of 3). The information contained within the 2022 Reg 19 SA is therefore accessible to the non-technical reader / general public. The NTS is written in a language that is easily understood and summarises all key parts of the process, conclusions and next steps.</p> <p>The NTS could be improved by providing concise reasons as to the selecting the preferred options based on the impacts on the topics in the SA Objectives, rather than pointing the reader to Appendix H of the 2022 Reg 19 SA Report.</p> |

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

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

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

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

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

REFERENCES

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

APPENDIX 8
Transport Technical Note (October 2021)

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

Land at Yieldfields, Stafford Road, Bloxwich

Transport Technical Note

105640

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

1 Introduction

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

Figure 1. Site Location



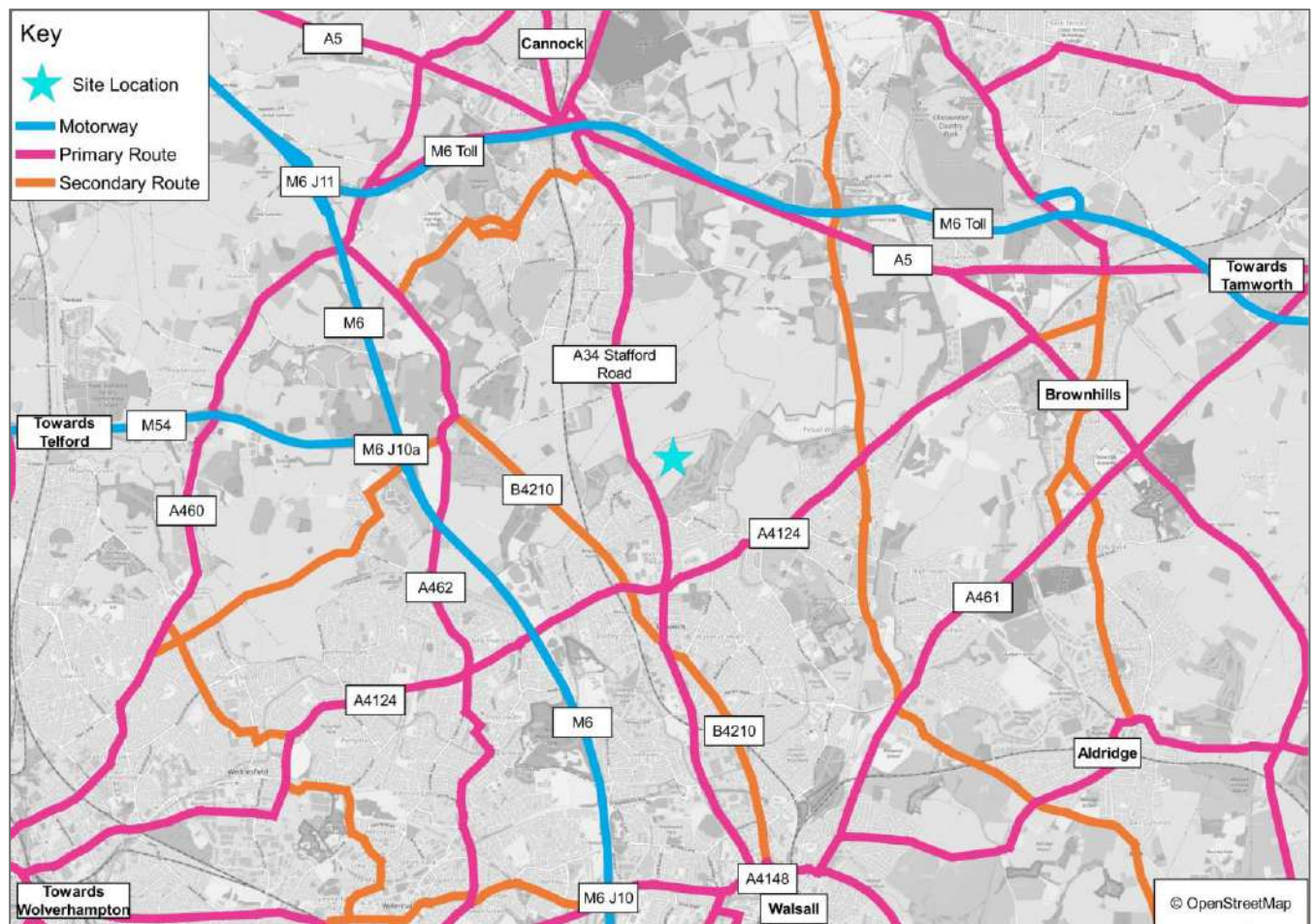
- 1.1.2 It is proposed that pedestrian and vehicle access to the site would be achieved via Stafford Road. An initial site access strategy is provided in **Appendix A** which shows that a new roundabout and priority access could be introduced to serve the site; this demonstrates that safe and suitable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

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

2 Site Location

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

Figure 2. Local Highway



3 Sustainable Travel

3.1 Pedestrian Travel

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

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

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

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

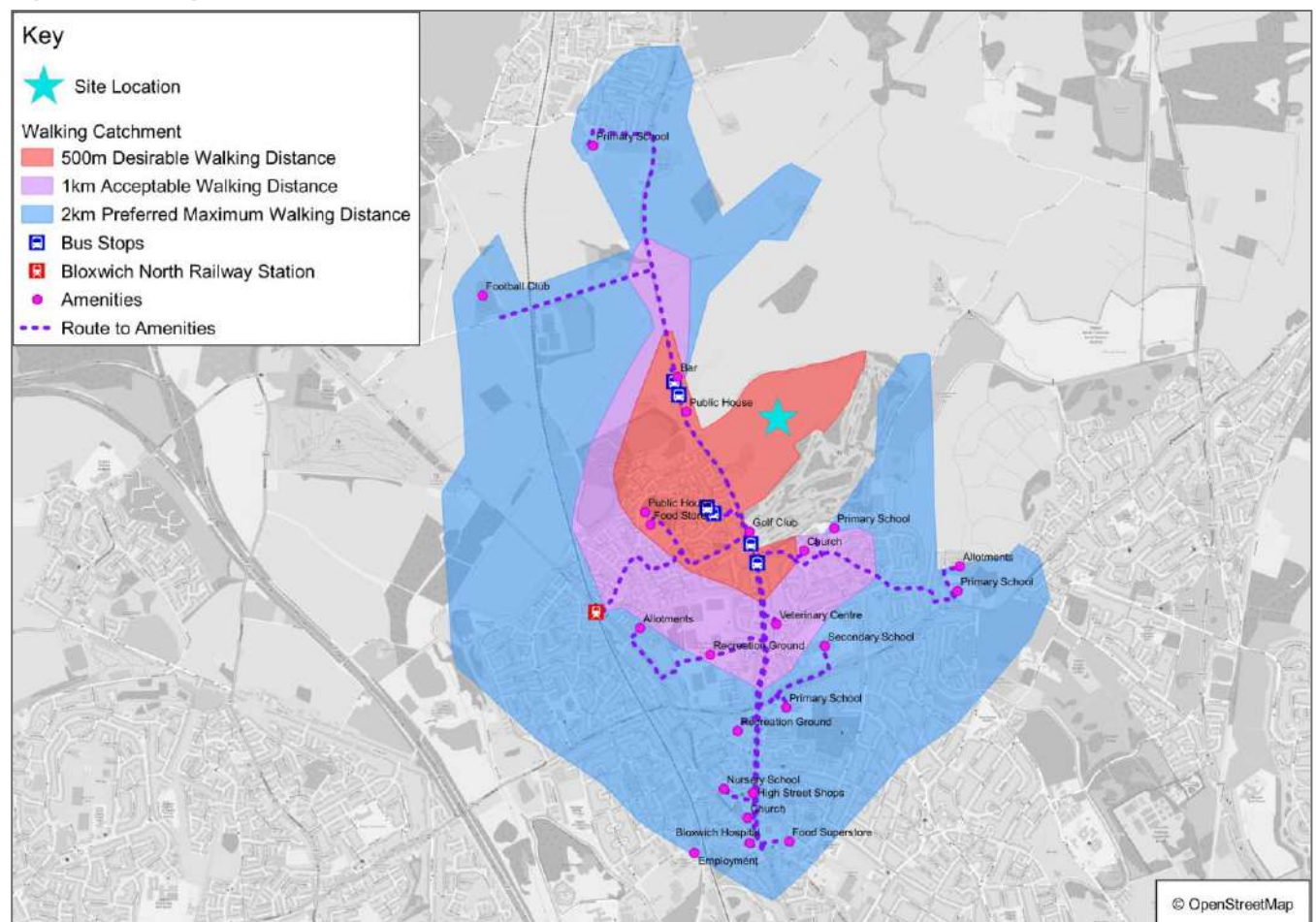
3.1.3 **Table 1** summarises the broad walking journey times that can fall under each category.

Table 1. Walk Journey Distance and Time Threshold

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

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

Figure 3. Walking Catchment



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

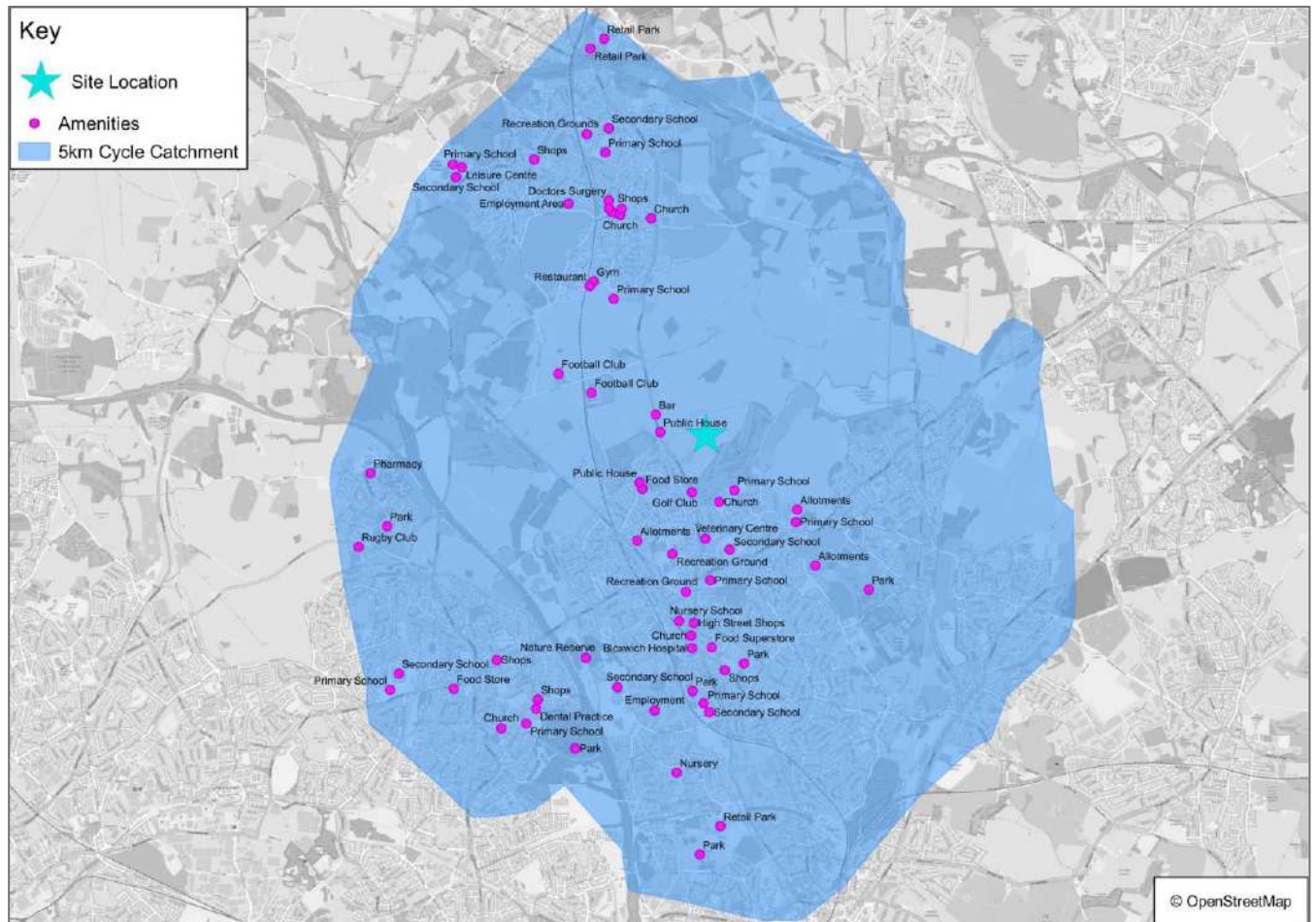
health centre, in addition to a contribution towards improvements for off-site secondary school provision in North Bloxwich.

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

3.2 Cycle Travel

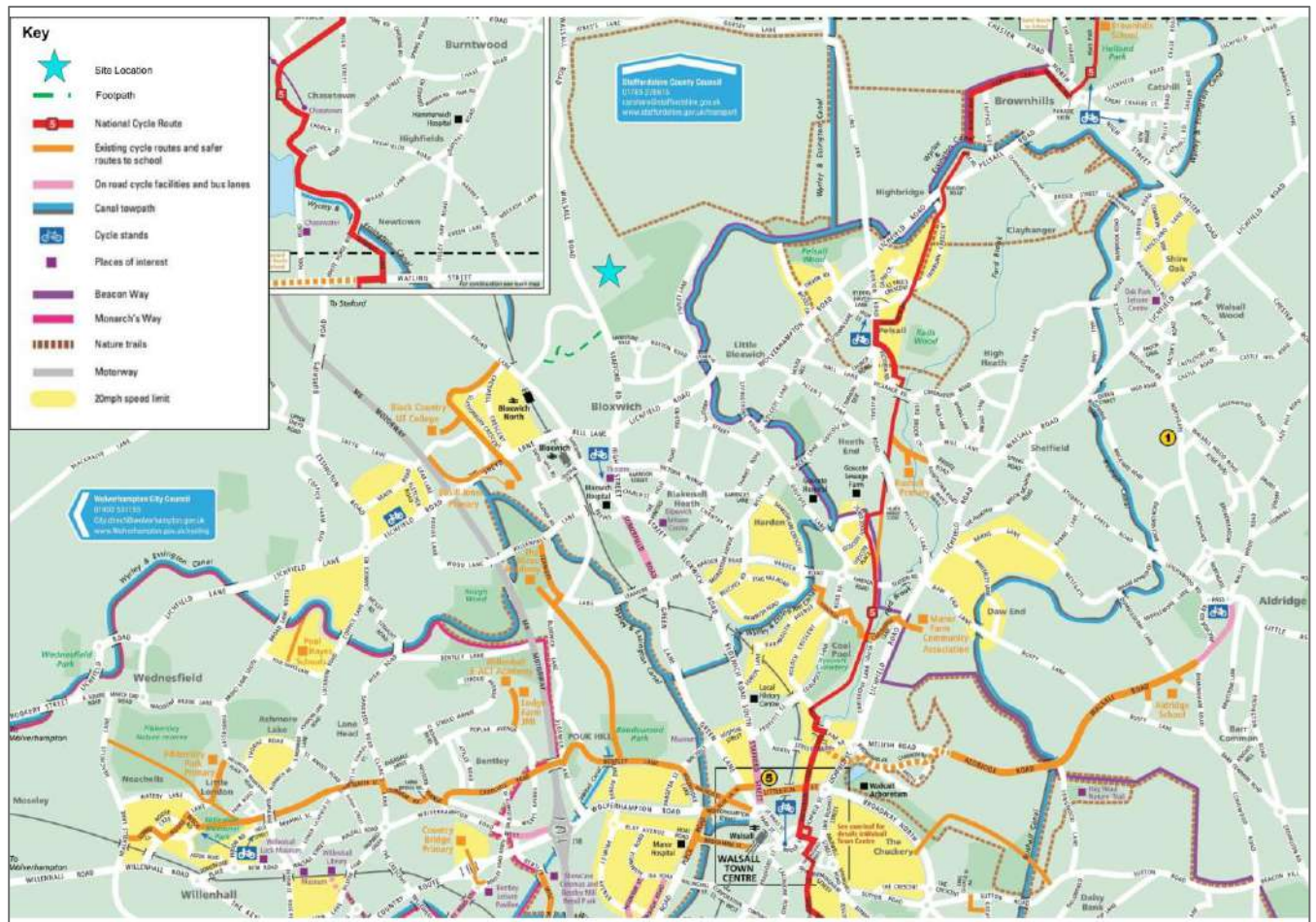
- 3.2.1 Local Transport Note (LTN) 1/04 states that there are limits to the distances generally considered acceptable for cycling. The mean average length for cycling is 4km (2.4 miles), although journeys of up to three times this distance are not uncommon for regular commuters. It is widely considered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

Figure 4. Cycle Catchment



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

Figure 5. Walsall Cycle Map Extract



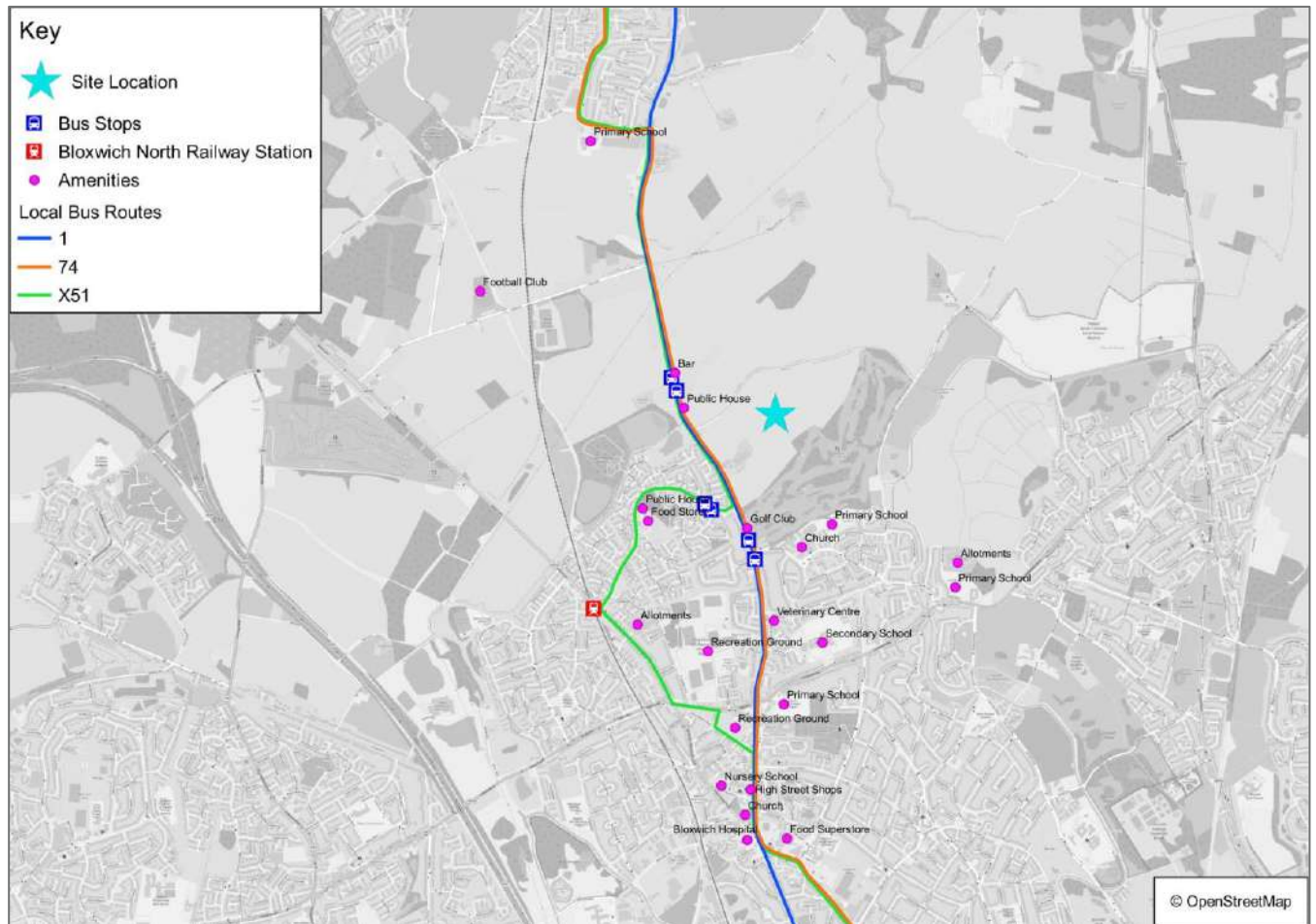
3.2.7 The above demonstrates that the residents of the proposed development could safely and conveniently access key destinations such as Bloxwich Town Centre and Bloxwich North Railway Station as well as further away locations by cycling.

3.3 Bus Travel

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

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

Figure 6. Local Bus Routes



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

Table 2. Bus Service Summary

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

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

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

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

3.4 Rail Travel

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

Table 3. Rail Services Summary

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

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

3.5 Summary

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

4 Development and Access Proposals

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

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

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

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

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

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

5 Trip Generation, Distribution and Assignment

5.1 Introduction

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

5.2 Vehicle Trip Generation

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

Table 4. Residential Trip Rates and Generation

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

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

5.3 Modal Split

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

Table 5. Method of Travel to Work

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

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

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

5.4 Person Trip Generation

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

Table 6. Multi-modal Trip Generation

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

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

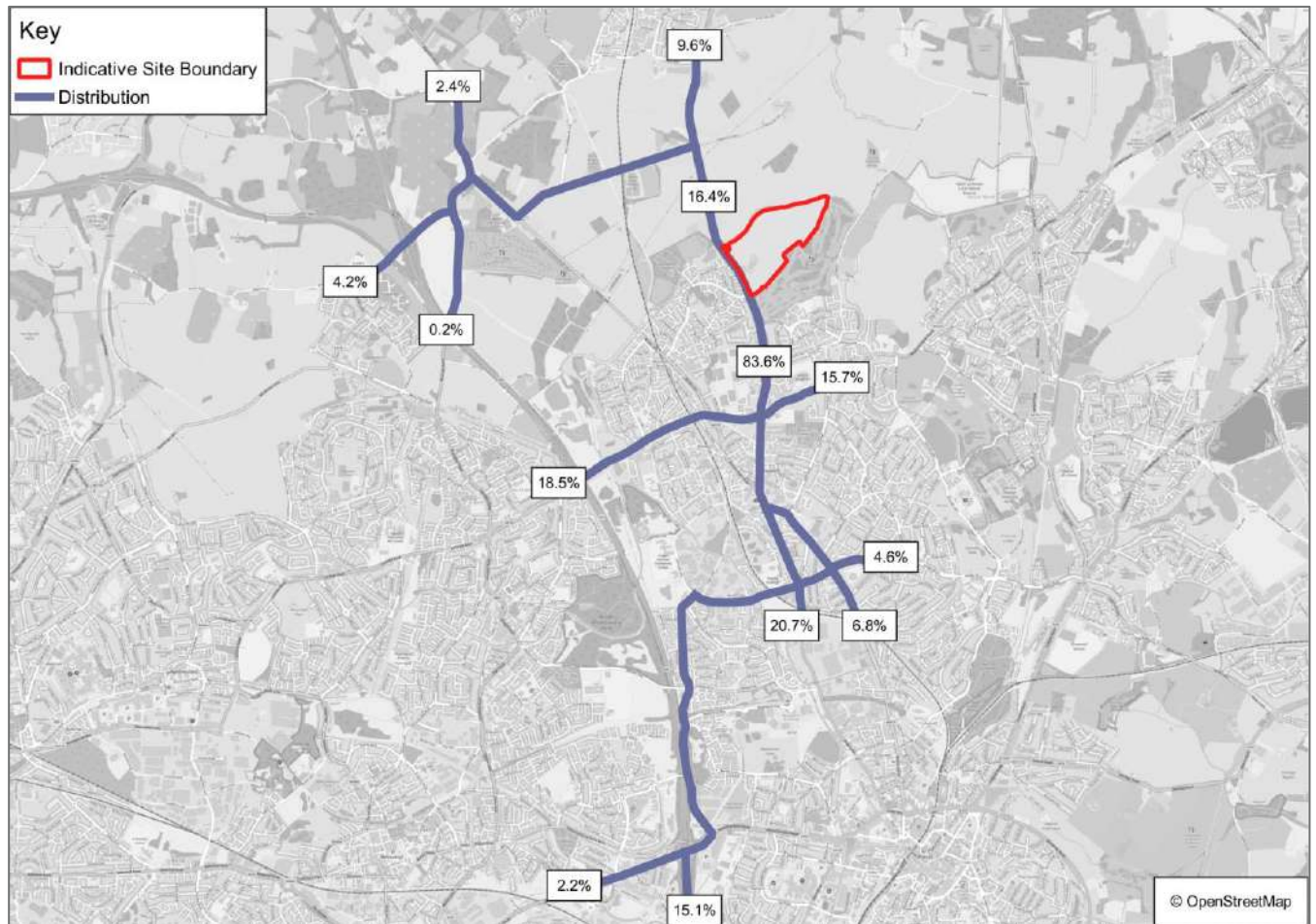
5.4.3 The existing infrastructure and facilities are considered sufficient to accommodate the increased level of users. Increased bus patronage may also provide the financial viability to increase the frequency of bus services close to the site. This would be examined in further detail as part of any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

5.5 Trip Distribution

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

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

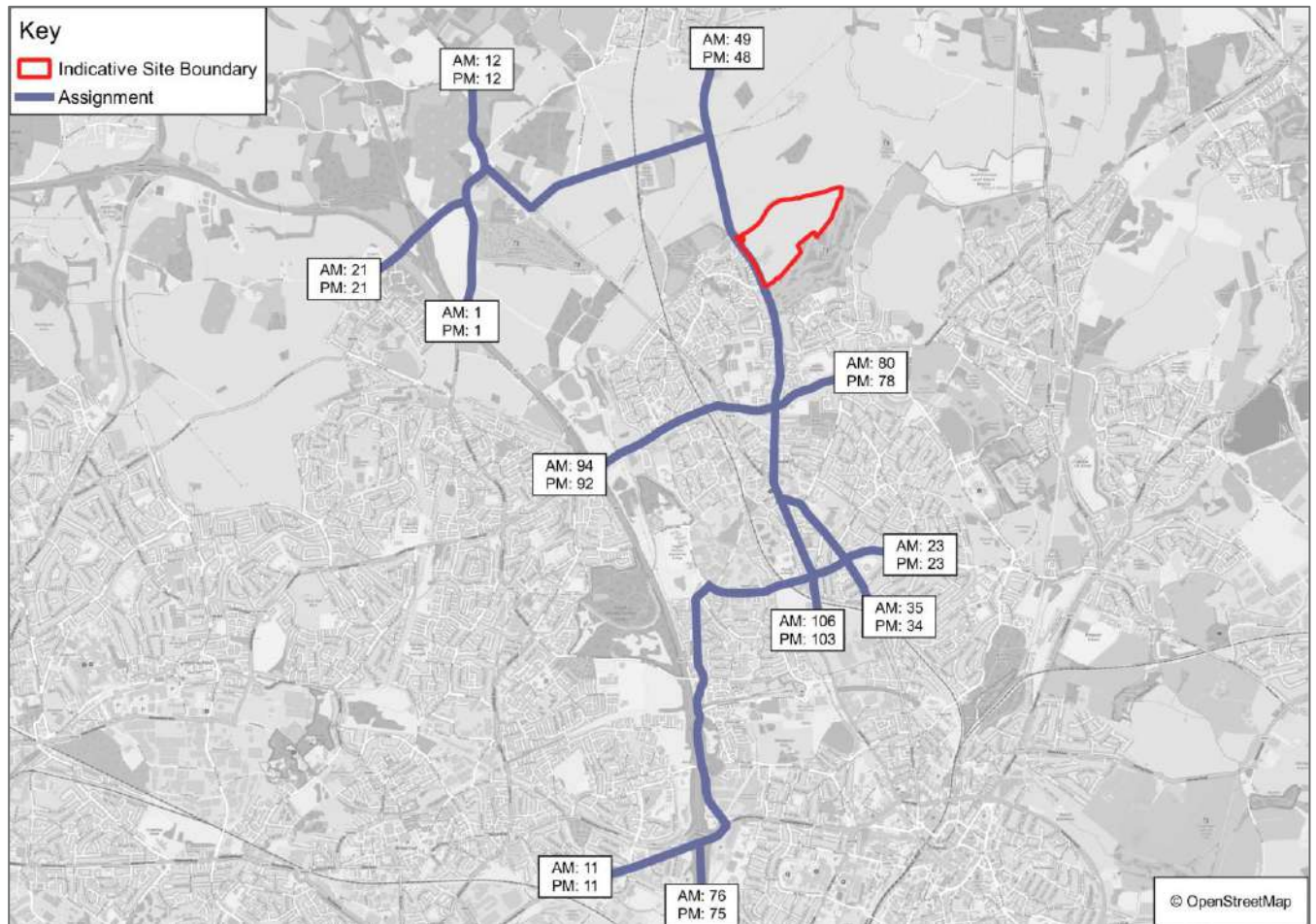
Figure 7. Development Traffic Distribution



5.6 Trip Assignment

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

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



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

6 Sustainable Travel Strategy

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

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

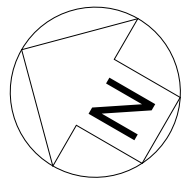
7 Summary and Conclusion

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

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

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

Appendix A Indicative Access Option



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

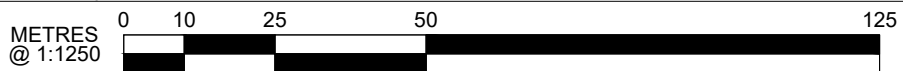
Listed Building

3m shared use path to east of A34 Stafford Road

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

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

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



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

| | | | | | |
|--------------------|------|----------|---------------|--|--|
| Drawing Status | | | | | |
| Preliminary | | | | | |
| | Name | Date | Status Code | | |
| Drawn | JF | 07.10.21 | S2 | | |
| Designed | JF | 07.10.21 | Scale | | |
| Eng Chk | CH | 07.10.21 | 1:1250 | | |
| Approved | CH | 07.10.21 | Revision | | |
| | | | P01 | | |

Drawing No. **105640 - PEF - ZZ - XX - DR - TP - 000001**

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Architect/Client/Contractor
L&Q Estates

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

Drawing Title
SITE ACCESS ARRANGEMENTS

Appendix B TRICS Outputs

Calculation Reference: AUDIT-610805-210826-0808

TRIP RATE CALCULATION SELECTION PARAMETERS:

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

Selected regions and areas:

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

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

Primary Filtering selection:

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

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

Parking Spaces Range: All Surveys Included

Parking Spaces per Dwelling Range: All Surveys Included

Bedrooms per Dwelling Range: All Surveys Included

Percentage of dwellings privately owned: All Surveys Included

Public Transport Provision:

Selection by: Include all surveys

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

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

Selected survey days:

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

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

Selected survey types:

| | |
|-----------------------|---------|
| Manual count | 17 days |
| Directional ATC Count | 2 days |

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

Selected Locations:

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

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

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

Secondary Filtering selection:

Use Class:

C3 19 days

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

Population within 500m Range:

All Surveys Included

Population within 1 mile:

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

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

Population within 5 miles:

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

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

Car ownership within 5 miles:

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

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

Travel Plan:

| | |
|-----|---------|
| Yes | 10 days |
| No | 9 days |

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

PTAL Rating:

| | |
|-----------------|---------|
| No PTAL Present | 19 days |
|-----------------|---------|

This data displays the number of selected surveys with PTAL Ratings.

| | | |
|-----------------------|-----|--|
| Covid-19 Restrictions | Yes | At least one survey within the selected data set was undertaken at a time of Covid-19 restrictions |
|-----------------------|-----|--|

LIST OF SITES relevant to selection parameters

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

LIST OF SITES relevant to selection parameters (Cont.)

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

LIST OF SITES relevant to selection parameters (Cont.)

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

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

MANUALLY DESELECTED SITES

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

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

TOTAL VEHICLES

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

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

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

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

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Parameter summary

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

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

APPENDIX 9

Preliminary Ecological Review: Constraints and Opportunities (July 2019)

Ecology Technical Note

Project: Land at Yieldfields Farm, Bloxwich (ECO4758)

Preliminary Ecological Review: Constraints and Opportunities

July 2019

1. INTRODUCTION AND METHODOLOGY

- 1.1. Aspect Ecology has been appointed by Gallagher Estates to undertake an ecological survey of land at Yieldfields Farm, Bloxwich. The site is located to the north of Bloxwich and south of Landywood, being intersected by the A34 Stafford Road.
- 1.2. To inform the ecological constraints and opportunities of potential development at the site, a desktop study and Phase 1 habitat survey has been undertaken by Aspect Ecology.
- 1.3. To gather information on records of protected or notable species within the site and its surrounds, in addition to details of any ecological designations, Staffordshire Ecological Record (SER) and EcoRecord (the ecological database for Birmingham and the Black Country) were contacted in 2016.
- 1.4. Information on statutory designations was obtained from the online Multi-Agency Geographic Information for the Countryside (MAGIC) database, which utilises data provided by Natural England.
- 1.5. The site was originally surveyed in June 2016 in order to ascertain the general ecological value of the land contained within the boundaries of the site and to identify the main habitats and ecological features present. In order to ensure the baseline ecological position is fully up to date, update survey work was undertaken in May 2019 based on a reduced survey area (see Plan 4758/ECO1).
- 1.6. For each survey, the site was surveyed based on standard Phase 1 Habitat Survey methodology¹, whereby the habitat types present are identified and mapped, together with an assessment of the species composition of each habitat. This technique provides an inventory of the basic habitat types present and allows identification of areas of greater potential which require further survey.

2. ECOLOGICAL DESIGNATIONS

Statutory designations

- 2.1. No identified statutory ecological designations are present within the site. However, Wyrley & Essington Canal Local Nature Reserve (LNR) is located adjacent to the west of the site. This

¹ Joint Nature Conservation Committee (2010) 'Handbook for Phase 1 habitat survey: A technique for environmental audit.'

is a restored canal which features a variety of habitats, supporting some nationally scarce species. Public access is encouraged and managed via car parks at each end, a restored towpath and footbridges, and a number of information panels.

- 2.2. The next nearest statutory designation is Pelsall North Common LNR, located some 0.5km east of the site. This comprises an area of heathland, acid grassland and canals, with public access managed via a network of trails.
- 2.3. The nearest Site of Special Scientific Interest (SSSI) to the site is located approximately 1.5km to the east, comprising Cannock Extension Canal. This is also designated as a Special Area of Conservation (SAC), due to its population of the Annex 2 species Floating Water-plantain *Luronium natans*. The SSSI/SAC is the richest known waterway of its type in the county, in terms of its aquatic flora, and also supports an important invertebrate assemblage.
- 2.4. The only other identified European designation within 10km of the site is Cannock Chase SAC, located some 9.1km north of the site, and designated for its Annex 1 heathland habitats.

Non-statutory designations²

- 2.5. A number of non-statutory designations lie adjacent, or in close proximity, to the site. The Wyrley and Essington Canal, which lies adjacent to the west of the site as described above, is also designated as a Site of Biological Importance (SBI).
- 2.6. Newtown Pool Site of Importance for Nature Conservation (SINC) lies in close proximity to the south-west of the site, separated by Stafford Road. The designation comprises a large pool surrounded by wet woodland and grassland. Hobble End Biodiversity Alert Site (BAS) lies adjacent to the north of the site, comprising a pond, woodland and scrub.
- 2.7. A number of sites of potential wildlife value are also present in the local area. This includes Yieldfields Hall and Lord Hay's Branch Canal Potential Sites of Importance (PSIs), both of which lie within the southern part of the site itself. Yieldfields Hall PSI is described as a series of pasture, mature hedges and a pond, where Great Crested Newts have been recorded. Lord Hay's Branch Canal comprises a former canal branch, abandoned in 1930 and filled in in 1954, now forming a linear band of scrub and grassland. A number of other PSIs are located in close proximity to the south-east of the site, including Bloxwich Golf Club and Fishley Lane Hedges.
- 2.8. No areas of designated ancient woodland are present within 500m of the site.
- 2.9. **Constraints and Opportunities.** A number of statutory designations are present in the locality which should be further assessed for potential effects at the planning application stage. However, the two LNRs in close proximity to the site are relatively well screened from the site, whilst they are subject to considerable public use at present. Furthermore, it is considered that a sensitively designed layout can avoid any significant adverse effects on these and other designations.

² The site straddles the boundary between Staffordshire and Birmingham. Non-statutory designations in Staffordshire comprise (i) Sites of Biological Importance (SBIs), which are of county importance and equivalent to County Wildlife Sites, and (ii) Biodiversity Alert Sites (BAS), which are of local importance or have potential to reach SBI standard through management.

Non-statutory designations in Birmingham comprise (i) Sites of Importance for Nature Conservation (SINCs), which are of county importance, (ii) Sites of Local Importance for Nature Conservation (SLINCs), which are of borough importance, and (iii) Potential Sites of Importance (PSIs), which potentially contain important habitats but were yet to be evaluated against local site criteria or were yet to be formally adopted in 2016.

- 2.10. The site lies within the Impact Risk Zone (IRZ) for Cannock Extension Canal SSSI/SAC. This indicates that residential development at this location could potentially result in adverse impacts, and Natural England would expect to be consulted on a planning application. As such, further assessment of potential effects should be undertaken to inform any application. However, Cannock Extension Canal SAC is not a popular tourist destination³ and as such it is likely recreational effects can be mitigated through the provision of greenspace if necessary, whilst hydrological effects can be mitigated through sustainable drainage. Therefore, it is anticipated that mitigation, including a sensitively designed masterplan, could avoid adverse residual effects.
- 2.11. The site lies outside of the identified 8km Zone of Influence for Cannock Chase SAC for which contributions towards strategic mitigation are required, however, it lies within the wider 15km zone. Therefore, further assessment is recommended at the application stage to assess the potential for cumulative effects. It is anticipated that this could be readily mitigated through the provision of greenspace.
- 2.12. It is also considered that effects on non-statutory designations can be avoided through a sensitively designed layout, including the use of buffering with semi-natural habitats adjacent to designations, which could provide an overall enhancement. The Potential Sites of Importance in the south of the site should be subject to further assessment, however it would appear unlikely that these would qualify as a local designation, whilst there is an opportunity to enhance retained habitats through appropriate management.

3. HABITATS AND ECOLOGICAL FEATURES

- 3.1. The site is dominated by agricultural land, formed by a mixture of arable, cattle-grazed pasture and silage fields. The fields are largely bound by a network of hedgerows and/or trees, many of which are mature in nature. A description of habitats recorded within the site is set out below, and shown on Plan 4758/ECO3.

Background records

- 3.2. A number of notable plant species have been recorded in the local area, including species of arable habitats such as Corn Spurrey *Spergula arvensis*, Field Woundwort *Stachys arvensis* and Cornflower *Centaurea cyanus*.

Arable

- 3.3. **2016 survey results.** Several large arable fields are present within the site, which are cultivated for Wheat, Oat or Oilseed Rape production. The arable fields are generally intensively cultivated, with very little uncultivated field margin and few weed species present. Some of the arable fields contain relatively small uncultivated areas, which comprise grassland with locally abundant herbaceous species, albeit these areas are species-poor.
- 3.4. **2019 survey results.** During the update Phase 1 survey conducted in May 2019, the site was recorded to continue to support a number of arable fields of a similar character to previously described in paragraph 3.3 above. An additional area of land contained within the 2019 survey area that was not subject to survey in 2016 was also recorded to support arable land, which is similar in nature to the other arable fields within the site.

³ As described in South Staffordshire Council's Allocation Sites for Housing, Employment and Gypsy, Traveler and Travelling Showpeople Habitat Regulations Assessment (November 2016)

Semi-improved grassland

- 3.5. **2016 survey results.** Much of the site is dominated by semi-improved grassland, which is used for cattle grazing or silage production. The cattle pastures tend to be stocked at a relatively low density, such that a variable sward length is present, including tall sward areas. The silage fields comprised a tall, very dense sward at the time of survey. The species composition of the pasture and silage fields are similar, being dominated by grasses typical of semi-improved neutral conditions such as Yorkshire-fog *Holcus lanatus*, Meadow Foxtail *Alopecurus pratensis*, Crested Dog's-tail *Cynosurus cristatus*, Perennial Rye-grass *Lolium perenne* and Cock's-foot *Dactylis glomerata*. Herbaceous species tend to be sparse, and include species typical of nutrient enriched soils.
- 3.6. **2019 survey results.** During the update Phase 1 survey undertaken in May 2019, the site was recorded to still be dominated by semi-improved grassland fields, of a similar nature to that described in paragraph 3.5 above.

Hedgerows, trees and scrub

- 3.7. **2016 survey results.** The site supports an established network of hedgerows, which vary widely in their structure and management. Some are thick, bushy and tall, whilst others are defunct and limited to scattered shrubs and/or trees along a fence line. Many of the hedgerows feature standard trees, mostly in the form of Oak *Quercus robur*, Ash *Fraxinus excelsior*, Alder *Alnus glutinosa* and Sycamore *Acer pseudoplatanus*. Along some boundaries, trees form a continuous linear feature. A small number of more isolated trees are present along some boundaries and within fields.
- 3.8. Hawthorn *Crataegus monogyna* tends to be dominant within the hedgerows, which are also generally rather species-poor, although species-richness is variable between hedgerows. The ground flora of the hedgerows is generally species-poor, with ruderal and grassland species dominating. A number of hedgerows are associated with dry / wet ditches, as described below at paragraphs 3.10 and 3.11.
- 3.9. **2019 survey results.** During the update Phase 1 survey conducted in May 2019, the site was recorded to continue to support a network of hedgerows of a similar character to described in paragraphs 3.7 and 3.8 above.

Watercourses and ditches

- 3.10. **2016 survey results.** Several of the hedgerows support dry ditches, whilst wet ditches are present in places, mostly at the site boundaries. A network of wet ditches were present along the north-eastern site boundaries, although it is understood these are now outside of the site boundary.
- 3.11. The offsite Wyrley & Essington Canal lies adjacent to the west of the site, and separated from it by a steep bund which is overgrown with Bramble *Rubus fruticosus* agg.. The canal itself features a good coverage and diversity of aquatic plants.
- 3.12. **2019 survey results.** During the update Phase 1 survey undertaken in May 2019, the watercourses and ditches were recorded to be as described in paragraph 3.11 above.

Buildings and hardstanding

- 3.13. **2016 survey results.** A number of buildings are present in the southern part of the site, associated with the active Yieldfields Farm. These comprise agricultural and residential buildings, of various construction types but tend to be relatively old and in a moderate state of repair.
- 3.14. **2019 survey results.** During the update Phase 1 survey conducted in May 2019, the buildings were recorded to be as described in paragraph 3.13 above.

Woodland

- 3.15. **2016 survey results.** A small area of woodland was present in the south-east of the site, although this is now located outside of the site boundary.
- 3.16. A number of areas of woodland and scrub lie adjacent to the site. These tend to be rather young and dense in nature, such that the ground flora is impoverished. The canopies are variously dominated by Sycamore, Oak and Ash.
- 3.17. An area of woodland to the north of the site, associated with Hobble End Biodiversity Alert Site, is more established. This area is dominated by Oak, over a sparse understorey and generally sparse ground flora, although ruderal species and Dog's-mercury *Mercurialis perennis* are locally dominant.
- 3.18. **2019 survey results.** During the update Phase 1 survey conducted in May 2019, the offsite woodlands were recorded to be largely as described in paragraphs in 3.15 - 3.17 above, with the additional presence of Bluebell *Hyacinthoides non-scripta* noted.

Tall ruderal vegetation

- 3.19. **2016 survey results.** Small areas of tall ruderal vegetation were recorded near the farm buildings towards the south of the site. These areas are species poor and dominated by Stinging Nettle *Urtica dioica*.
- 3.20. **2019 survey results.** During the update Phase 1 survey carried out in May 2019, the areas of tall ruderal vegetation around the farm buildings were as described in paragraph 3.19 above. Additional areas of tall ruderal vegetation were recorded at the margins of fields towards the west of the site.

Ponds

- 3.21. **2016 survey results.** A small pond was recorded along the southern boundary of the site, which supported a very shallow water depth at the time of survey. The pond is heavily shaded by surrounding vegetation and is heavily silted. Two other offsite ponds are located in close proximity to the southern boundary, which are slightly larger but very shallow in nature.
- 3.22. **2019 survey results.** During the update Phase 1 survey undertaken in May 2019, the pond along the southern site boundary, in addition to one of the offsite ponds, was recorded to be dry. The second offsite pond was recorded to support a shallow water level, as previously noted.

Invasive species

- 3.23. **2016 survey results.** A stand of Japanese Knotweed *Fallopia japonica* was recorded in close proximity to the south of the site, forming a stand some 15 x 5m in size.
- 3.24. **2019 survey results.** The stand of Japanese Knotweed was still recorded to be present. No other invasive species were recorded.

4. FAUNA

- 4.1. As part of the Phase 1 habitat surveys in 2016 and 2019, general observations were made of any faunal use of the site, with particular attention paid to the potential presence of protected or notable species. A preliminary assessment of the site's likely value to faunal groups is set out in the following sections, along with associated constraints and opportunities with regard to development.

Bats

- 4.2. **Background records.** Records were returned for 5 bat species within a 4km search radius around the site centroid, comprising Common Pipistrelle *Pipistrellus pipistrellus*, Soprano Pipistrelle *P. pygmaeus*, Brown Long-eared Bat *Plecotus auritus*, Noctule *Nyctalus noctula* and Daubenton's Bat *Myotis daubentonii*. None of these records relate to the site itself.
- 4.3. **Preliminary assessment 2016.** Few buildings are present within the site, although a cluster of agricultural buildings is present in the south. Some of these have potential to support roosting bats, in the form of raised tiles and loft voids. Elsewhere within the site, roosting opportunities are likely to be available within trees which bound many of the fields. It is therefore recommended that specific survey work is undertaken at the application stage to assess the status of roosting bats within the site.
- 4.4. In terms of foraging and commuting habitat, the majority of the site is of poor suitability for bats generally due to its open and semi-improved nature. However, the network of hedgerows and trees are likely to offer good foraging and commuting opportunities, particularly where these form dense, continuous features. As such, bat activity survey work should be undertaken at the application stage, to identify both species present and bat activity levels across the site.
- 4.5. **Update survey results and assessment 2019.** During the updated Phase 1 survey conducted in May 2019, the site was recorded to provide potential opportunities for roosting, foraging and commuting bats as described in paragraphs 4.3 and 4.4 above.
- 4.6. **Constraints and opportunities.** The proposals should seek to retain any confirmed bat roosts, or otherwise provide adequate mitigation and compensation. In addition, the proposals should seek to retain the network of hedgerows where possible, particularly where these are continuous.
- 4.7. The proposals present an opportunity to provide an enhancement for bats, through the creation of new roosting opportunities in the form of bat boxes. Enhancements to foraging and commuting bats could be provided by stocking up defunct hedgerows, and reinstating hedgerows which are no longer present.

Badger

- 4.8. **Background records.** Numerous records of Badger *Meles meles* were returned within a 4km search radius around the site centroid. The majority are located to the north of the site, with no records returned from within the site itself.
- 4.9. **Preliminary assessment.** No evidence of Badger activity was recorded during the Phase 1 survey work carried out in 2016. However, anecdotal information from the landowner indicates the species has been present in the past, whilst numerous records are present in the area.
- 4.10. **Update survey results and assessment 2019.** During the update Phase 1 survey undertaken in May 2019, evidence of Badger was recorded within/immediately bounding the site in the form of two Badger setts, labelled S1 and S2 on Plan 4758/ECO3. S1 was recorded to comprise an active sett supporting approximately 7 entrances alongside a track leading from the farm. A number of the entrances were recorded to support fresh spoil, bedding, Badger guard hairs and footprints. Based on the number of entrances and level of activity recorded, it is likely that this sett comprises a main sett. S2 was recorded to comprise a single, one-entrance, sett which appeared inactive at the time of the site and likely comprises an outlier sett. A number of Badger prints were also noted within the arable fields within the west of the site. A full Badger survey is therefore recommended to inform any planning application.
- 4.11. **Constraints and opportunities.** Badger activity was recorded during the update Phase 1 survey and as such it is considered that the site is likely to be of some importance to Badgers, albeit this is likely to be relatively low and localised. The main sett should be retained where possible, in addition to commuting routes and core foraging areas. An overall enhancement could be provided through new landscape planting, including species of particular value to Badger.

Other mammals

- 4.12. **Background records.** The protected species Water Vole *Arvicola amphibius* has been recorded within the local area, including along the Wyrley and Essington Canal adjacent to the west of the site. The Priority Species Brown Hare *Lepus europaeus* has also been recorded in the locality.
- 4.13. **Preliminary assessment 2016.** During the Phase 1 habitat survey undertaken in 2016, evidence of a number of mammal species of no particular conservation importance was recorded within the site, including Red Deer *Cervus elaphus*.
- 4.14. Few opportunities for Water Vole are present within the site, due to the scarcity of wet ditches with emergent vegetation. Nevertheless, it is recommended that the wet ditch in the west of the site is subject to a Water Vole survey to inform an application, albeit this is of poor suitability. The site is unlikely to support other protected mammal species such as Dormouse, due to the lack of extensive woody habitats and the site's location at the periphery of the species' range.
- 4.15. The site may also support other UK Priority Species of mammal, such as Brown Hare and Hedgehog. However, based on the nature of the habitats present and the lack of observations during the Phase 1 survey, the site is unlikely to be of particular importance to any such species.

- 4.16. **Update survey results and assessment 2019.** During the update Phase 1 survey conducted in May 2019, the site was recorded to support opportunities for other mammals as described in paragraphs 4.13, 4.14 and 4.15 above.
- 4.17. **Constraints and opportunities.** The site is relatively unconstrained in terms of other mammals. The provision of new landscape planting could provide benefits to a range of mammals such as Hedgehog, whilst new wetland features in the vicinity of the canal could potentially benefit Water Vole. The proposals also offer an opportunity to reopen wet ditches within the site, encouraging emergent vegetation which in turn could attract Water Vole.

Birds

- 4.18. **Background records.** Numerous records of birds were returned from the data search for the local area, many of which are wetland species which are unlikely to make use of the site. However, a number of notable farmland bird species have been recorded in the locality, including Skylark *Alauda arvensis*, Yellowhammer *Emberiza citrinella* and Barn Owl *Tyto alba*.
- 4.19. **Preliminary assessment 2016.** During the Phase 1 habitat survey undertaken at the site in 2016, moderate numbers of Skylark (Red Listed Bird of Conservation Concern) were recorded, with singing males recorded mostly from the arable fields. However, the winter-sown nature of many of the fields is likely to preclude successful breeding later in the season, reducing the site's value for this species.
- 4.20. Other Birds of Conservation Concern incidentally recorded within the site include Yellowhammer *Emberiza citrinella* (Red-listed) within hedgerows in the south-west of the site, Willow Warbler (Red-listed), Mistle Thrush (Red-listed), and Tawny Owl (Amber-listed). In addition, House Sparrow (Red-listed) and Swift (Amber-listed) were recorded around the farm buildings in the south of the site. Despite their conservation statuses, all of these species remain relatively common.
- 4.21. **Update survey results and assessment 2019.** During the update Phase 1 survey conducted in May 2019, no further Birds of Conservation Concern were recorded within the site.
- 4.22. **Constraints and opportunities.** Development of the site is likely to result in a change in the breeding bird assemblage within the site, with the possible reduction of numbers of farmland bird species such as Skylark, but with significant new opportunities created for declining urban species such as the UK Priority Species House Sparrow, Starling *Sturnus vulgaris* and Swift. These species could be particularly targeted for enhancement through benefits arising from the installation of bird nest boxes within new buildings. In addition, new landscape planting would provide enhanced nesting opportunities for a variety of other species in the long term, such as the Priority Species Song Thrush *Turdus philomelos*.

Reptiles

- 4.23. **Background records.** Few reptile records were returned for the local area, limited to Common Lizard *Zootoca vivipara* and Grass Snake *Natrix natrix*. Neither has been recorded within the site itself.
- 4.24. **Preliminary assessment 2016.** The site offers opportunities for reptiles in the form of tall-sward grassland and hedgerows. However, much of the tall-sward grassland comprises a very uniform, tall dense sward, which provides limited basking opportunities for reptiles. Furthermore, the silage fields appear to be cut annually, such that opportunities for reptiles are likely to be highly seasonal. Nevertheless, it is recommended that a reptile survey is

undertaken at the application stage, to assess their presence/absence, distribution within the site and population size class.

- 4.25. **Update survey results and assessment 2019.** The update Phase 1 survey conducted in May 2019 recorded the site to support similar opportunities for reptile species as described above.
- 4.26. **Constraints and opportunities.** The site is considered unlikely to support a high density of reptiles. Should reptiles be present, appropriate mitigation should be provided to maintain opportunities for this species group within the site. The proposals provide a potential opportunity to enhance the site for reptiles, through the creation of new habitats centred on wildflower grassland and scrub, particularly where this provides connectivity across the site and to off-site habitats.

Amphibians

- 4.27. **Background records.** A large number of records of the protected species Great Crested Newt *Triturus cristatus* were returned for the local area, particularly to the south-east and west, albeit not within the site itself. The Priority Species Common Toad *Bufo bufo* has also been recorded in the locality.
- 4.28. **Preliminary assessment 2016.** A single small pond was recorded within the site, along the southern boundary, whilst a high number of ponds are present in the near vicinity of the site. The single onsite pond appears to be of poor suitability for Great Crested Newt. However, this species is highly likely to breed in the wider locality, given the high number of nearby ponds and records of the species. Similarly, Common Toad is likely to breed in the local area. Therefore, specific survey work should be undertaken at these ponds at the application stage, where access can be arranged.
- 4.29. **Update survey results and assessment 2019.** During the update Phase 1 survey work carried out in May 2019, the single pond recorded along the southern boundary was noted to be dry and is therefore still considered to offer poor suitability for Great Crested Newt. However, offsite ponds are present within the immediate surrounds of the site which were noted to be suitable to support Great Crested Newt.
- 4.30. **Constraints and opportunities.** Great Crested Newts are likely to breed in nearby offsite ponds and enter the site in their terrestrial phase. However, the site's importance to this species is limited by the lack of onsite breeding opportunities, and any use of the site is likely to be in the near vicinity of offsite breeding ponds. Therefore, it is anticipated that amphibians can be adequately safeguarded under a sensitively designed scheme, particularly if this includes semi-natural greenspace in the vicinity of offsite ponds. Enhancements could be provided for amphibians through the creation of new waterbodies within the site, for example, as part of sustainable drainage systems.

Invertebrates

- 4.31. **Background records.** No records of protected invertebrate species were returned from the desktop study. However, numerous records of UK Priority Species were returned, the majority relating to butterflies and moths which appear to be well recorded in the area.
- 4.32. **Preliminary assessment 2016.** The majority of the site is dominated by arable and semi-improved grassland habitats which are species-poor in nature. These habitats are common in the locality and are unlikely to support an important invertebrate assemblage. However,

the network of hedgerows and trees are likely to be of somewhat elevated value in the context of the site, whilst offsite habitats such as ponds, woodland and the canal to the west may be of local or higher value.

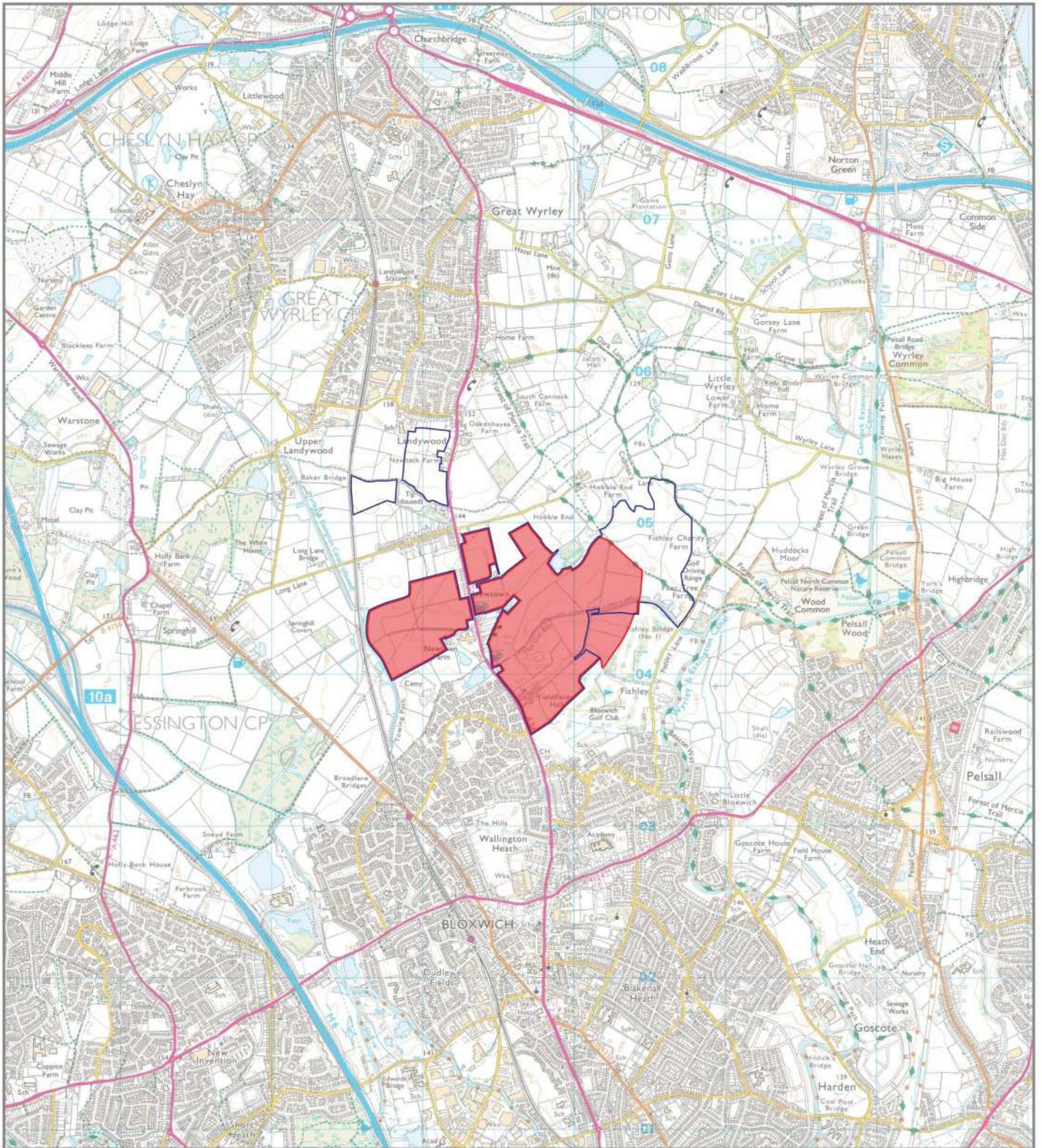
- 4.33. **Update survey results and assessment 2019.** During the update Phase 1 survey work undertaken in May 2019, the site was recorded to support potential habitats for invertebrate species as described above in paragraph 4.32.
- 4.34. **Constraints and opportunities.** Habitat features of somewhat elevated importance should be retained under the proposals where possible, whilst buffering should be considered adjacent to offsite habitats of potential value to invertebrates. The proposals could provide a significant enhancement to invertebrates, particularly through the reinforcement of existing hedgerows with native species, reinstating missing hedgerows, and creating new habitats such as wildflower grassland and native landscape planting.

5. CONCLUSION

- 5.1. A number of statutory and non-statutory designations are present in the vicinity of the site, whilst part of the site itself has been identified as a potential non-statutory designation. It is anticipated that the ecological interest of these designations can be adequately safeguarded under a sensitively designed scheme, albeit further assessment is recommended at the application stage.
- 5.2. The site is dominated by agricultural land, comprising arable and semi-improved grassland, which is of negligible to low ecological value. The fields are largely bound by a network of hedgerows and/or trees, some of which are well-established. These features are of elevated value in the context of the site. Other habitats are limited in extent, comprising scrub, tall ruderal vegetation, a ditch, a pond, buildings and hardstanding.
- 5.3. A number of protected faunal species are likely to make use of relatively small parts of the site. These are likely to include roosting and foraging bats, Badgers, nesting birds, reptiles and Great Crested Newts. It is therefore recommended that further survey work is undertaken at the application stage, whilst it is anticipated that any species could likely be safeguarded and associated habitats potentially enhanced under a sensitively designed masterplan.
- 5.4. Significant opportunities for biodiversity are present under any proposals. These arise following the removal of land from intensive agricultural production, whilst in addition the creation and reinforcement of green infrastructure across the site, incorporating existing features of ecological value such as hedgerows and mature trees, would give rise to significant potential gains. As such, it is concluded that the proposals are highly deliverable in ecological terms.

Plan 4758/ECO1:

Site Location



Key:

- Site Location – 2019 Survey
- Site Location – 2016 Survey



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Land at Yieldfields Farm, Bloxwich PROJECT

Site Location TITLE

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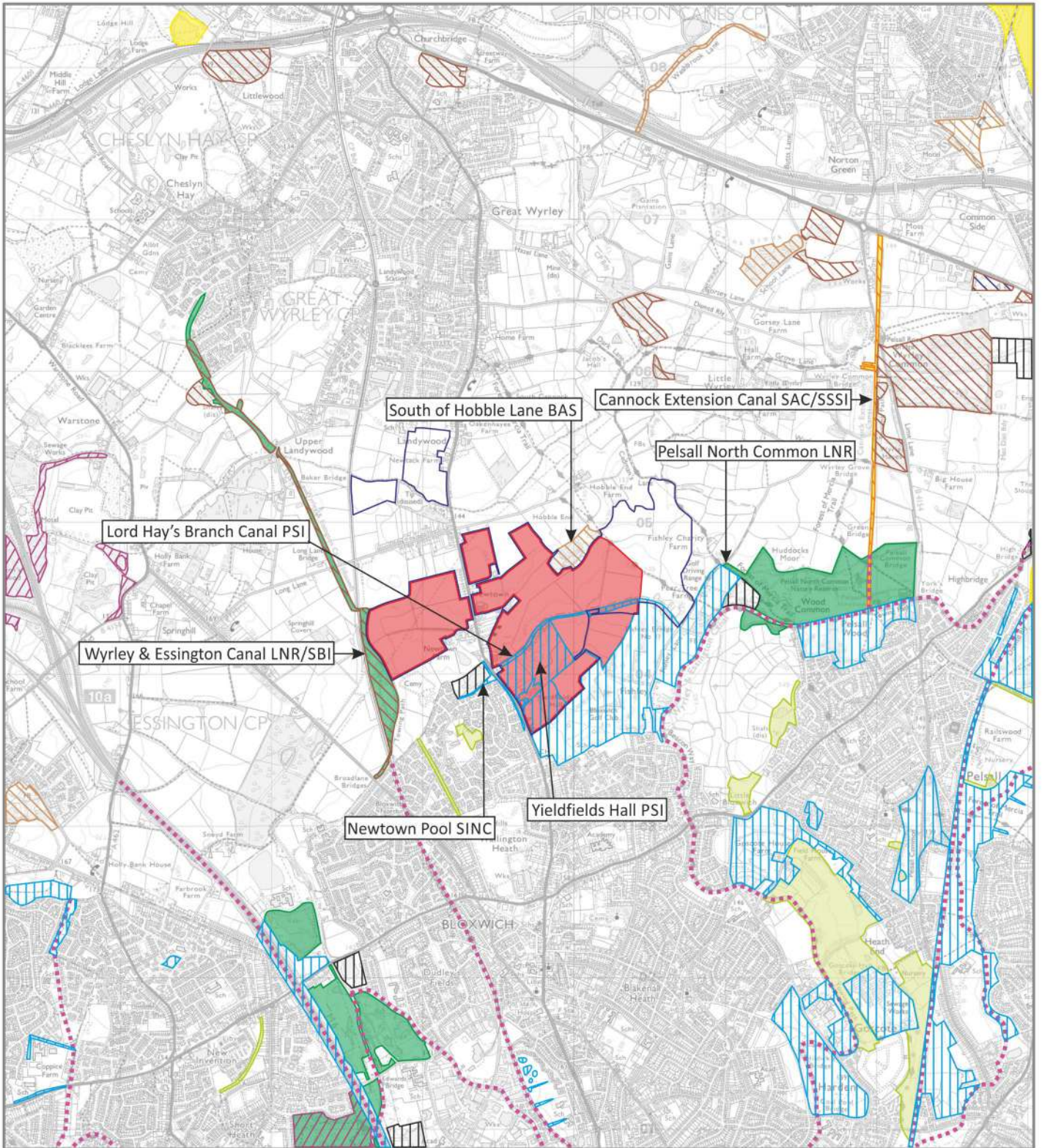
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Plan 4758/ECO2:

Ecological Designations



Key:

- Site Location - 2019 Survey
- Site Location - 2016 Survey
- Special Area of Conservation (SAC)
- Site of Special Scientific Interest (SSSI)
- Local Nature Reserve (LNR)
- Site of Importance for Nature Conservation (SINC)
- Potential Site of Importance (PSI)
- Site of Local Importance for Nature Conservation (SLINC)
- Site of Biological Importance (SBI)
- Biodiversity Alert Site (BAS)
- Wildlife Corridor
- Ancient & Semi-Natural Woodland (ASW)



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Plan 4758/ECO3:

Habitats and Ecological Features



- KEY:**
-  Site Boundary - 2019 Survey
 -  Site Boundary - 2016 Survey
 -  Arable
 -  Semi-improved Grassland
 -  Woodland
 -  Tree
 -  Hedgerow
 -  Dense / Scattered Scrub
 -  Tall Ruderal Vegetation
 -  Watercourse
 -  Ditch
 -  Pond
 -  Buildings
 -  Hardstanding
 -  Japanese Knotweed
 -  Badger Set
 -  Photograph Location

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Land at Yieldfields Farm, Bloxwich PROJECT

Habitats and Ecological Features TITLE

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