

Sustainability Appraisal of the Wolverhampton Local Plan

Regulation 19 SA Report Volume 1 of 3: Non-technical summary

October 2024



LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

Sustainability Appraisal of the Wolverhampton Local Plan 2024–2042

Including:
Strategic Environmental Assessment,
Health Impact Assessment and
Equality Impact Assessment

Volume 1 of 3: Non-Technical Summary of the Regulation 19 SA

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1 Introduction

The purpose of this report

- N1. Lepus Consulting Ltd (Lepus) has been instructed by the City of Wolverhampton Council (CWC) to undertake a Sustainability Appraisal (SA) process, incorporating the requirements of Strategic Environmental Assessment (SEA), Health Impact Assessment (HIA) and Equality Impact Assessment (EqIA), for the Wolverhampton Local Plan (WLP) 2024-2042.
- N2. The Regulation 19 SA Report has been prepared to present full details of the SA process to date and inform CWC's preparation of the WLP. This document comprises a Non-Technical Summary (NTS) of the Regulation 19 SA, which presents an assessment of the likely sustainability impacts of proposals set out in the Plan.
- N3. This NTS document comprises **Volume 1** of the SA; it is accompanied by **Volume 2**: The Main SA Report and **Volume 3**: Appendices to the main SA Report.

The Wolverhampton Local Plan

- N4. The UK government requires that local plans should be reviewed every five years and updated as necessary. The Wolverhampton Local Plan, referred to hereafter as the WLP, sets out the overall strategy for development in the City of Wolverhampton for the Plan period 2024 to 2042, including a vision for Wolverhampton and underpinning strategic priorities, and an overall spatial strategy supported by site allocations and policies to guide land use and development within the Plan area.
- N5. The WLP vision is taken from the 'Our City: Our Plan' strategic framework¹ which seeks to ensure that "*Wulfrunians will live longer, healthier lives*". The emerging WLP has proposed 13 strategic priorities under four overarching objectives, to provide healthy, inclusive communities, well-connected neighbourhoods, improved jobs and training and support a thriving economy. The WLP strategic priorities have been assessed against the SA Objectives and have been identified to result in positive effects across the SA Framework (see **Appendix G** for more details).
- N6. Once adopted, the WLP will form part of the statutory development plan for the borough, replacing and updating the currently adopted Black Country Core Strategy (BCCS)² and the Wolverhampton Local Development Scheme (LDS)³.

¹ City of Wolverhampton Council (2024) Our City: Our Plan. Available at: <https://www.wolverhampton.gov.uk/your-council-and-meetings/our-city-our-plan> [Date accessed: 30/09/24]

² Black Country Authorities (2011) Black Country Core Strategy. Available at: <https://blackcountryplan.dudley.gov.uk/t1/p2/> [Date accessed: 05/08/24]

³ City of Wolverhampton Council (2024) Local Development Scheme 2027-2027. Available at: <https://www.wolverhampton.gov.uk/sites/default/files/2024-02/Wolverhampton-Local-Development-Scheme-2024-27.pdf> [Date accessed: 30/09/24]

What is Sustainability Appraisal and Strategic Environmental Assessment?

- N7. The Planning and Compulsory Purchase Act⁴ requires a sustainability appraisal to be carried out on development plan documents in the UK. Additionally, the Environmental Assessment of Plans and Programmes Regulations⁵ (SEA Regulations) require an SEA to be prepared for a wide range of plans and programmes, including development plan documents, to ensure that environmental issues are fully integrated and addressed during decision-making.
- N8. SA is the process of informing and influencing the preparation of a local plan or development plan document to optimise its sustainability. SA considers the social, economic and environmental performance of the plan. The SA (and SEA) can help to ensure that proposals in the plan are appropriate given the reasonable alternatives. It can be used to test the evidence underpinning the plan and help to demonstrate how the tests of soundness have been met. SA should be applied as an iterative process informing the plan throughout its development.
- N9. Sustainability can be defined as “meeting the needs of the present generation without compromising the ability of future generations to meet their own needs”⁶. To be sustainable, development requires the integration of the needs of society, the economy and the environment (see **Figure N.1.1**).

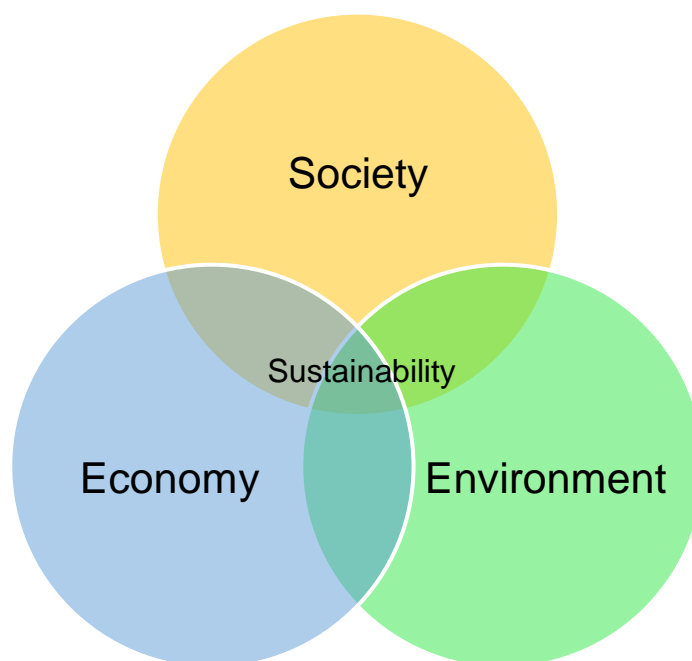


Figure N.1.1: Sustainable development

⁴ Planning and Compulsory Purchase Act 2004. Available at: <https://www.legislation.gov.uk/ukpga/2004/5/contents> [Date accessed: 30/09/24]

⁵ The Environmental Assessment of Plans and Programmes Regulations 2004. Available at: <http://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date accessed: 30/09/24]

⁶ Brundtland (1987) Report of the World Commission on Environment and Development: Our Common Future. Available at: <http://www.un-documents.net/our-common-future.pdf> [Date accessed: 30/09/24]

N10. The WLP is at the plan-making stage Regulation 19, known as ‘Publication’ in the Local Plan Regulations 2012⁷, as shown in Stage C of **Figure N.1.2**.

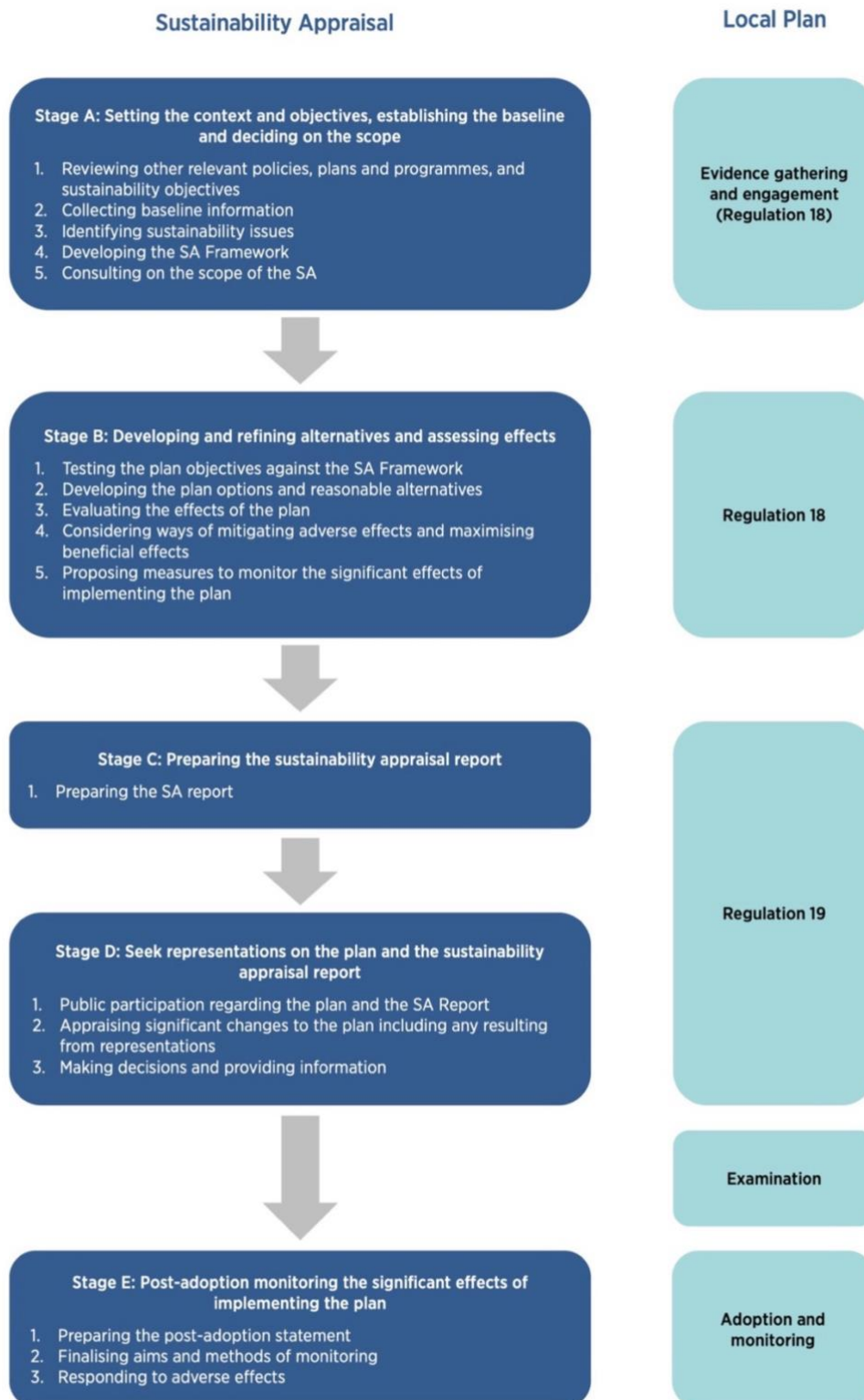


Figure N.1.2: Sustainability Appraisal and the Local Plan process

⁷ The Town and Country Planning (Local Planning) (England) Regulations 2012. SI 767

Wolverhampton Local Plan Area

N11. **Figure N.1.3** shows the administrative boundary of Wolverhampton, in the West Midlands. It is a highly urbanised area with the city of Wolverhampton in the centre, characterised by a rich industrial heritage and diverse cultural landscape, with small extents of Green Belt land to the north and west.

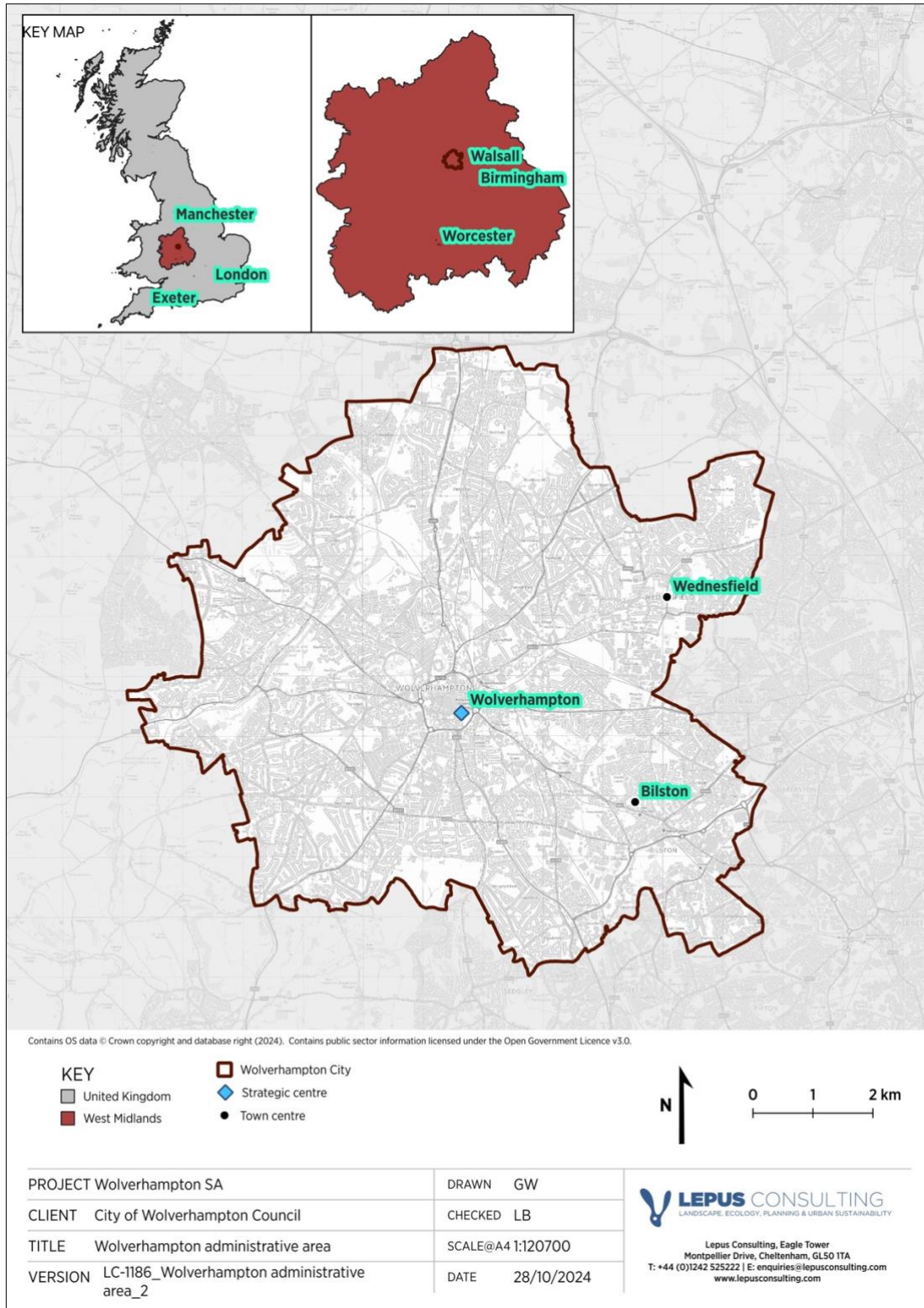


Figure N.1.3: Wolverhampton Local Plan area

The SA process alongside the Wolverhampton Local Plan

- N12. **Figure N.1.4** provides an overview of the stages that have been undertaken during the preparation of the WLP and accompanying SA outputs, summarising the purpose and content of each.
- N13. Each stage included consultation with the statutory bodies for SA/SEA: Historic England, Natural England and the Environment Agency. The Regulation 18 stage also included public consultation with other stakeholders and interested parties. Comments received were considered during the preparation of the SA outputs (see **Appendix C**).

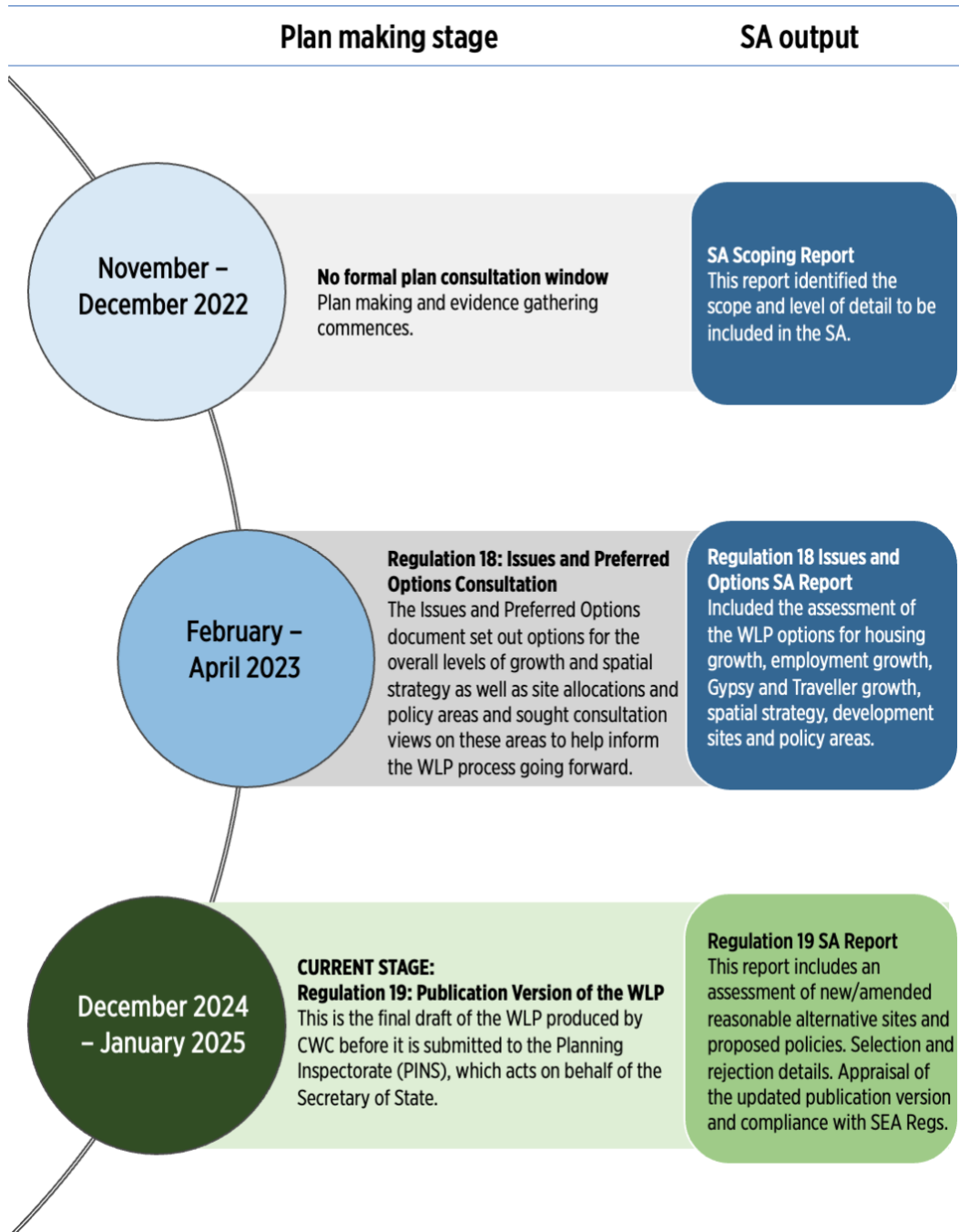


Figure N.1.4: The WLP and SA process so far

2 Purpose and content of the Regulation 19 SA Report

About the Regulation 19 SA Report

- N14. The Regulation 19 SA Report presents the overall findings of the SA of the WLP, which is composed principally of 55 policies and 44 site allocations. The SA Report summarises the SA process to date and has been prepared to help inform the examination stage of the WLP.
- N15. The purpose of the SA of the WLP is to:
- Identify, describe and evaluate the likely sustainability effects of the WLP proposals and their reasonable alternatives;
 - Inform the Council's decision making and preparation of the WLP; and
 - Provide an opportunity for statutory consultees, interested parties and the public to offer views on any aspect of the SA.

Structure of the Regulation 19 SA Report

- N16. The SA of the WLP is presented in three volumes:
- N17. **Volume 1: Non-Technical Summary (NTS)** (this document) provides a summary of the Regulation 19 SA.
- N18. **Volume 2: Main SA Report** contains the following chapters:
- **Chapter 1** presents an introduction to the report.
 - **Chapter 2** sets out information about the WLP and the SA process to date.
 - **Chapter 3** presents the evolution of the environment without the WLP.
 - **Chapter 4** sets out the SA methodology.
 - **Chapter 5** presents details of the reasonable alternatives considered throughout the SA process.
 - **Chapter 6** presents details on the preferred approach.
 - **Chapters 7 to 15** set out the likely significant effects on the environment, per SEA topic (air, biodiversity, cultural heritage, climatic factors, human health, landscape, population and material assets, soil and water).
 - **Chapter 16** presents the cumulative effects assessment.
 - **Chapter 17** sets out a range of monitoring recommendations for the WLP for CWC to consider following the adoption of the Plan.
 - **Chapter 18** summarises ways in which the SA has influenced the preparation of the WLP throughout the plan making process, including through recommendations made in the SA.
 - **Chapter 19** outlines the conclusions, residual effects and next steps.
- N19. **Volume 3: Appendices** provides further contextual information as follows:

- **Appendix A** presents a review of other relevant policies, plans and programmes (PPPs) that may influence the Wolverhampton area.
- **Appendix B** presents the SA Framework that has been used to evaluate all reasonable alternatives, options and proposals.
- **Appendix C** presents the consultation responses received during each stage of the SA process.
- **Appendix D** presents the assessment of the updated housing and employment growth options factoring in the latest identified need figures.
- **Appendix E** provides additional context to **Chapter 4** of the main Regulation 19 SA Report regarding the topic-specific methodologies and assumptions used to assess reasonable alternative sites.
- **Appendix F** presents the baseline assessment of 40 reasonable alternative sites, before application of policy mitigation.
- **Appendix G** presents the assessment of 55 strategic planning policies included in the Regulation 19 version of the WLP.
- **Appendix H** considers the potential mitigating influence of the WLP policies (excluding site-specific policies) and presents the post-mitigation assessment of the 40 reasonable alternative sites.
- **Appendix I** presents CWC's outline reasons for selection and rejection of reasonable alternative sites which have been identified, described and evaluated through the SA process.
- **Appendix J** presents the assessment of site allocation policy requirements as set out in the Regulation 19 WLP associated with the 44 allocations.
- **Appendix K** presents the EqIA screening of the WLP policies.

Equality Impact Assessment (EqIA) and Health Impact Assessment (HIA)

- N20. The EqIA is a systematic and evidence-based tool, which enables the WLP to consider the likely impact of work on different groups of people who share a protected characteristic⁸, identified in the Equality Act (2010). The EqIA has been incorporated within SA Objective 11: Equality (see **Appendix B** for SA Framework) and a screening of each proposed WLP policy against the protected characteristics of the Equality Act in **Appendix K**. The EqIA is discussed further within **Chapter 13** of the main report.
- N21. HIAs are not statutory requirements for local plans. However, carrying out this assessment helps to ensure the WLP considers all health issues and construct new policies with the aim of increasing positive health impacts and reducing negative impacts. It should be noted that human health is a topic which features in Schedule 2 of the SEA Regulations: Information for environmental reports. The HIA has been incorporated within SA Objective 12: Health (see **Appendix B** for the full SA Framework) and discussed further within **Chapter 11** of the main report.

⁸ It is against the law to discriminate against someone because of: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

3 Baseline and key sustainability issues of the WLP area

Overview

- N22. There are a number of plans, policies and programmes (PPPs) that set out the environmental protection objectives which proposals within the WLP should adhere to (see **Appendix A**). In accordance with the SEA Regulations, the SA process needs to consider these PPPs, as well as existing environmental problems and the baseline characteristics of the local area, in order to determine the likely effects of the local plan itself.
- N23. **Volume 2** (the main Regulation 19 SA Report) includes information relating to the baseline and key issues for the Wolverhampton area, drawing on information gathered during the Scoping stage, relating to the following sustainability topics (which incorporate the topics identified in Schedule 2 of the SEA Regulations⁹):
- Air;
 - Biodiversity, flora and fauna;
 - Climatic factors;
 - Cultural heritage;
 - Human health;
 - Landscape and townscape;
 - Population and material assets;
 - Water and soil resources.
- N24. The SEA Regulations also requires the Environmental Report to present “*information on the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme*”.
- N25. Without the WLP, no new plan-led development will occur in Wolverhampton other than that which is currently proposed in the adopted BCCS and AAPs. In this scenario, there is more uncertainty in terms of the nature and scale of development that may come forward. In a ‘no plan’ scenario, other PPPs will continue to be a material consideration in planning decisions and legislative protection will continue to be in place.
- N26. An overview of each topic, including the key issues affecting Wolverhampton and the likely evolution of the baseline within Wolverhampton in the absence of the WLP, taking into account information gathered at the scoping stage as well as more up-to-date data and statistics is provided in **Table N.3.1**.

⁹ Schedule 2 of the SEA Regulations identifies the likely significant effects on the environment, including “*issues such as (a) biodiversity, (b) population, (c) human health, (d) fauna, (e) flora, (f) soil, (g) water, (h) air, (i) climatic factors, (j) material assets, (k) cultural heritage including architectural and archaeological heritage, (l) landscape and (m) the interrelationship between the issues referred to in sub-paragraphs (a) to (l)*.”

Table N.3.1: Summary of key issues in Wolverhampton and the likely evolution of the environment without the WLP

Theme	Key issues	Likely evolution without the WLP
Air	<ul style="list-style-type: none"> Wolverhampton Air Quality Management Area (AQMA) covers the whole of the local authority area and the principal pollutant affecting air quality is nitrogen dioxide (NO₂) mostly sources from road traffic. New housing, employment development areas, commercial and domestic sources, transport, and increasing visitor numbers in the area have the potential to lead to adverse impacts on air quality. Atmospheric pollutants are expected to increase as a result of increasing traffic congestion. 	<ul style="list-style-type: none"> Primary sources of air pollution in the UK include road transport, industry, imports and agriculture. These sources would not be expected to change. Traffic and congestion are likely to increase with population growth, with implications in particular for air quality, residents and wildlife, especially those within 200m of main roads. The Wolverhampton AQMA covers the whole local authority area and the principal pollutant affecting air quality is NO₂, mostly sourced from road traffic. Continuing to monitor air quality, especially within AQMAs, and implementation of measures outlined in Air Quality Action Plans will ensure that objectives are in place to decrease exceedances over time. National trends suggest there is an increasing uptake of lower emission vehicle types, such as electric and hybrid cars, which will be likely to help limit road transport associated emissions in the WLP area and would be likely to further improve air quality. The Local Transport Plan will still be implemented, which will be likely to have a positive impact on the local road network, relieving congestion and improving provision of public transport across the plan area. However, the proportion of residents in the WLP area that will opt to use sustainable transport modes is uncertain.
Biodiversity, Fauna and Flora	<ul style="list-style-type: none"> There are a few Biodiversity Action Plan (BAP) habitats and species present within the Local Plan area, which should continue to be managed and conserved appropriately, and opportunities sought for enhancement. Enhancements to the WLP area's green infrastructure (GI) network will support local and sub-regional biodiversity networks through helping improve connectivity for habitats and species. Growth within the WLP area is likely to put pressure on biodiversity. There are potential impacts from habitat fragmentation resulting from new development areas and recreational pressures on wildlife sites. Geodiversity is a key contributor to the WLP's natural environment and may be affected by noise or light pollution. <p>Key issues relating to the Birds and Habitats Directives:</p>	<ul style="list-style-type: none"> Sites designated for their national and international biodiversity and/or geodiversity value will continue to benefit from legislative protection. A minimum of 10% biodiversity net gain at development sites will be required, due to policies set out in the National Planning Policy Framework (NPPF) and as set out in the Environment Act. The NPPF and its policies relating to biodiversity will continue to be material considerations in planning decisions. It is however uncertain if developers will voluntarily adopt additional biodiversity enhancement measures. There may be less opportunity to establish a strategically planned green infrastructure network across Wolverhampton without the WLP, which may reduce the likelihood for significant net gain in biodiversity or wider ecological benefits via planned developments. It may be difficult to ensure that development is of appropriate type, scale and location to avoid adverse impacts on either biodiversity/geodiversity designations (of international or local significance) or on the functioning ecological network of the WLP area

Theme	Key issues	Likely evolution without the WLP
	<ul style="list-style-type: none"> • The following likely significant effects (LSEs) have been identified in the Habitats Regulations Assessment (HRA) screening process for the WLP: <ul style="list-style-type: none"> ○ Air quality (Cannock Chase SAC, Cannock Extension Canal SAC and Fens Pool SAC). ○ Water quality and/or quantity changes (Cannock Extension Canal SAC, Fens Pools SAC, Humber Estuary SAC and Ramsar, Midland Mere and Mosses Phase 1 and Phase 2 Ramsar, Motte Meadows SAC, Severn Estuary SAC and Ramsar). ○ Recreational pressure (Cannock Chase SAC). 	<p>and the various essential ecosystem services this provides.</p>
<p>Climatic Factors</p>	<ul style="list-style-type: none"> • Flooding from main rivers is an issue across the WLP area. Surface water run-off management in the WLP area is an important issue on all developments of any size, clearly highlighting the need for a sustainable drainage system (SuDS) that maximise source control measures. • Climate change has the potential to increase the risk of fluvial and surface water flooding. • A range of further risks linked to climate change may affect the WLP area. These include the following: <ul style="list-style-type: none"> ○ an increased incidence of heat related illnesses and deaths during the summer, and injuries and deaths due to more storm and flooding events; ○ adverse effect on water quality from watercourse levels and turbulent flow after heavy rain and a reduction of water flow; a need to increase the capacity of sewers; ○ loss of species that are at the edge of their southerly distribution and spread of species at the northern edge of their distribution; and ○ increased drought and flood related problems 	<ul style="list-style-type: none"> • Climatic and anthropogenic-induced climate change are increasing concerns for the WLP area. Emissions could continue to rise, and future development may not be as low carbon as possible, with potential for little demand for locally generated sustainable energy. • The frequency and severity of flooding will be likely to increase over time due to the changing climate, increasing the occurrence of extreme weather events and in light of the existing urbanised nature of the WLP area. The risk of surface water flooding will depend on the size, nature and extent of non-porous built surface cover in the future, and the effectiveness of the existing drainage system. • Total carbon emissions are expected to continue to decrease over the longer term as renewable energy becomes an increasingly competitive force in the UK energy market. • It is uncertain if there will be an opportunity to seek aspirational targets in regard to energy efficiency within development in association with meeting the target of carbon neutrality by 2050 in the absence of the WLP. • Technological advances, which may include renewable energies, electric vehicles, and efficient electricity supplies, will be expected to occur. • The lack of a planned growth strategy could lead to increased carbon emissions as development may be less likely to be located in sustainable locations.

Theme	Key issues	Likely evolution without the WLP
	<p>such as soil shrinkages and subsidence.</p> <ul style="list-style-type: none"> GI should be enhanced and expanded to maximise ecosystem services and climate resilience. New development needs to incorporate energy efficiency measures and climate change adaptive features in order to respond to predicted levels of climate change. 	
Cultural Heritage	<ul style="list-style-type: none"> Even though heritage assets will continue to benefit from legislative protection, development in the WLP area may have the potential to lead to effects on historic landscapes and cause direct damage to archaeological sites, monuments and buildings and/ or their settings. Archaeological remains, both seen, and unseen have the potential to be affected by new development areas. 	<ul style="list-style-type: none"> National and local guidance seeks to protect designated assets and their settings such as listed buildings, conservation areas, scheduled monuments, and registered parks and gardens. The Heritage at Risk Register will continue to be managed by Historic England who will continue to work with stakeholders to protect these assets. Further heritage assets are likely to be identified in the future, with or without the Plan. It is uncertain if connectivity with places, local distinctiveness and culture would be emphasised and protected in the absence of the WLP as it is anticipated that the WLP will require a Heritage Statement and/or Archaeological Desk-Based Assessment to be prepared to accompany future planning applications, where appropriate.
Human Health	<ul style="list-style-type: none"> As all the proposed development within the WLP is located within an AQMA, this is likely to lead to adverse impacts on health, without intervention. The increasing population in the City of Wolverhampton could have placed pressure on the capacity of health infrastructure and leisure facilities. The life expectancy of men and women is anticipated to rise over time, in line with national trends, leading to a greater proportion of older residents with specific needs for housing and services. Residents in Wolverhampton have a slightly higher than average proportion of overweight adults and lower average life expectancy in comparison to the West Midlands average and national average. 	<ul style="list-style-type: none"> The population is expected to continue to increase. This is likely to place greater pressure on the capacity of key services and amenities, including health and leisure facilities and housing. The life expectancy of men and women is anticipated to rise over time, in line with national trends, leading to a greater proportion of older residents with specific needs for housing and care services. It is uncertain if existing public green spaces will be maintained and enhanced, to encourage residents to live healthy and active lifestyles.
Landscape	<ul style="list-style-type: none"> Parts of Wolverhampton lie within the West Midlands Green Belt. The WLP area is amongst the least tranquil areas of the West Midlands. 	<ul style="list-style-type: none"> The West Midlands Green Belt will continue to benefit from legislative protection. The WLP area will remain amongst the least tranquil areas of the West Midlands.

Theme	Key issues	Likely evolution without the WLP
		<ul style="list-style-type: none"> It is uncertain the extent to which development will seek to conserve and enhance the character of local landscape and townscapes. In the absence of Plan-led development, there could potentially be a rise in the quantity of new development which discords with the local character by altering the style and scale of development.
<p>Population and Material Assets</p>	<ul style="list-style-type: none"> The population of the City of Wolverhampton is expected to continue to increase, this will have secondary effects. New business start-ups should continue to be encouraged in the WLP area. Qualification levels in Wolverhampton are generally lower than regional and national percentages. The employment level for Wolverhampton is lower than that for Great Britain overall. House prices are expected to increase and demand for housing will remain high. Energy consumption from industrial and commercial sources in Wolverhampton is high and expected to increase. There is a need to increase the proportion of waste sent for reuse, recycling or compost and move away from the use of landfill and waste disposal. There is a need to identify and support opportunities for renewable energy provision locally. 	<ul style="list-style-type: none"> The population of Wolverhampton is expected to continue to increase, which will be likely to result in secondary effects. Some of these secondary effects could include effects on health, education and social inequalities due to poorer accommodation and potential for fewer sustainable travel choices being available. Energy consumption in all sectors is expected to increase. There is likely to be a continued increase in the cost of buying or renting housing, although the rate of increase may reduce compared to previous years, in line with national trends. It is uncertain if future housing provision will satisfy local needs in terms of type, cost and location. There is expected to be a shortage of housing in the area. This could lead to existing residents who wish to form new households living in overcrowded conditions or being forced to move outside the area, and potential new residents being unable to move in. There will be less planning control over the location of future housing, with potential for planning applications for new housing being allowed in unsustainable locations and/or without necessary supporting infrastructure. There is a need for more affordable housing within the WLP area, which could potentially be exacerbated without the WLP. Continuing transformation of employment land into high quality employment land is likely in the absence of the WLP. The number of jobs and businesses in the WLP is expected to increase based on current trend data. Although, there may be less planning control over the location of employment land and there may be limited job availability in some sectors if land is not allocated through the WLP. Without a clear strategy to focus the limited amount of investment into centres and to defend against further investment in out-of-centre locations, the vitality of Wolverhampton City Centre may decline. This will have consequences in terms of opportunities for residents to access facilities, services and jobs, especially those who are disadvantaged. Furthermore, without investment concentrated into accessible centres there will be a less sustainable development pattern resulting in an increased need to travel, leading to increases in greenhouse gas (GHG)

Theme	Key issues	Likely evolution without the WLP
		emissions. Declining centres will contribute to poor social inclusion.
Soil	<ul style="list-style-type: none"> Soil is a non-renewable resource that would continue to be lost. The majority of land in the WLP area is Agricultural Land Classification (ALC) 'urban', with pockets of ALC Grade 3 and ALC Grade 4, which may be under threat from new growth areas and associated infrastructure. The development of new and improved infrastructure to accompany growth has the potential to lead to an increase in soil erosion and soil loss. 	<ul style="list-style-type: none"> Soil is a non-renewable resource that will be likely to continue to be lost. Rates of soil erosion and loss of soil fertility will be likely to continue to rise due to the impacts of potential loss of GI/ previously undeveloped land and climate change.
Water	<ul style="list-style-type: none"> A proportion of Wolverhampton contains groundwater source protection zones (SPZs). Increases in population and development would be likely to harm the water quality in and around Wolverhampton. 	<ul style="list-style-type: none"> There could potentially be new developments that result in over-capacity issues at wastewater treatment works (either cumulatively or individually), such as at Roundhill and Gospel End Sewerage Treatment Works. In the absence of plan-led development, the efficiency and sustainability of water consumption may be unlikely to improve owing to the likely increase in population and associated water demand, depending on the nature of any future changes to national regulations, such as the Building Regulations and any emerging policy / regulations relating to water neutrality. Water abstraction, consumption and treatment in the local area will continue to be managed by the Environment Agency and water companies through the Humber and Severn River Basin Management Plans (RBMPs), Water Resources Management Plans (WRMPs) and Catchment Abstraction Management Strategies (CAMS) in line with the Water Framework Directive.

4 SA methodology

The SA Framework

- N27. Taking into consideration the key issues discussed in **NTS Chapter 3** above, an SA Framework was established which includes SA Objectives, decision-making criteria and indicators. The SA Framework provides a way in which sustainability effects can be described, analysed and compared, and for monitoring the implementation of the Plan.
- N28. The full SA Framework used throughout the SA process including indicators is presented in **Appendix B**, with a summary of the 14 SA Objectives shown in **Table N.4.1**. It should be noted that the order of SA Objectives does not infer any prioritisation.

Table N.4.1: Summary of the SA Objectives

	SA Objectives	Relevance to SEA Regulations – Schedule 2
1	Cultural heritage: Protect, enhance and manage sites, features and areas of archaeological, historical and cultural heritage importance.	Cultural heritage
2	Landscape: Protect, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening local distinctiveness and sense of place.	Landscape, cultural heritage
3	Biodiversity, flora, fauna and geodiversity: Protect, enhance and manage biodiversity and geodiversity.	Biodiversity, flora and fauna
4	Climate change mitigation: Minimise Wolverhampton’s contribution to climate change.	Climatic factors
5	Climate change adaptation: Plan for the anticipated levels of climate change.	Climatic factors, soil and water
6	Natural resources: Protect and conserve natural resources.	Soil, water and material assets
7	Pollution: Reduce air, soil, water and noise pollution.	Air, water, soil and human health
8	Waste: Reduce waste generation and disposal and achieve the sustainable management of waste.	Population and material assets
9	Transport and accessibility: Improve the efficiency of transport networks by increasing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel.	Climatic factors, population and material assets
10	Housing: Provide affordable, environmentally sound and good quality housing for all.	Population
11	Equality: Reduce poverty, crime and social deprivation and secure economic inclusion.	Population and human health
12	Health: Safeguard and improve community health, safety and wellbeing.	Human health and population
13	Economy: Develop a dynamic, diverse and knowledge-based economy that excels in innovation with higher value, lower impact activities.	Population and material assets
14	Education, skills and training: Raise educational attainment and develop and maintain a skilled workforce to support long-term competitiveness.	Population

Significant effects

- N29. A single value from **Table N.4.2** has been allocated to each SA Objective for each reasonable alternative, option or policy evaluated in the SA process. Justification for the classification of the impact for each SA objective is presented in an accompanying narrative assessment text for all SA assessments.
- N30. The assessment of impacts and subsequent evaluation of significant effects is in accordance with Schedule 2 (6) of the SEA Regulations, where feasible, which states that the effects should include: “*secondary, cumulative, synergistic, short, medium and long-term effects, permanent and temporary effects, positive and negative effects, cumulative and synergistic effects*”.

Table N.4.2: Guide for likely significant effects

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

- N31. Limitations, assumptions and topic-specific methodologies applied in the SA are discussed in further detail within **Chapter 4** of the Regulation 19 SA Report (**Volume 2**) and **Appendix E (Volume 3)**.

5 Reasonable alternatives

Preface

- N32. The SEA Regulations state as part of the requirements for preparing an environmental report, that the local plan making process must identify, describe and evaluate reasonable alternatives.
- N33. There is no specific definition of a 'reasonable alternative'. CWC has identified reasonable alternatives for the WLP at different stages of the plan making process, including different types of reasonable alternatives, including options to meet the required amount of housing, employment and Gypsy and Traveller growth, as well as spatial options and reasonable alternative development sites.
- N34. The SA has assessed all options and reasonable alternatives on a comparable basis against the SA Framework to identify likely sustainability impacts, and it is the Council's role to use the SA findings, alongside other evidence base material, to decide which options to 'select' for allocation in the WLP and which to 'reject' from further consideration.
- N35. In the case of the WLP, all reasonable alternatives have been identified and described by the Council's plan makers. **Figure N.5.1** below outlines the definitions for the different types of reasonable alternatives assessed throughout the SA process.

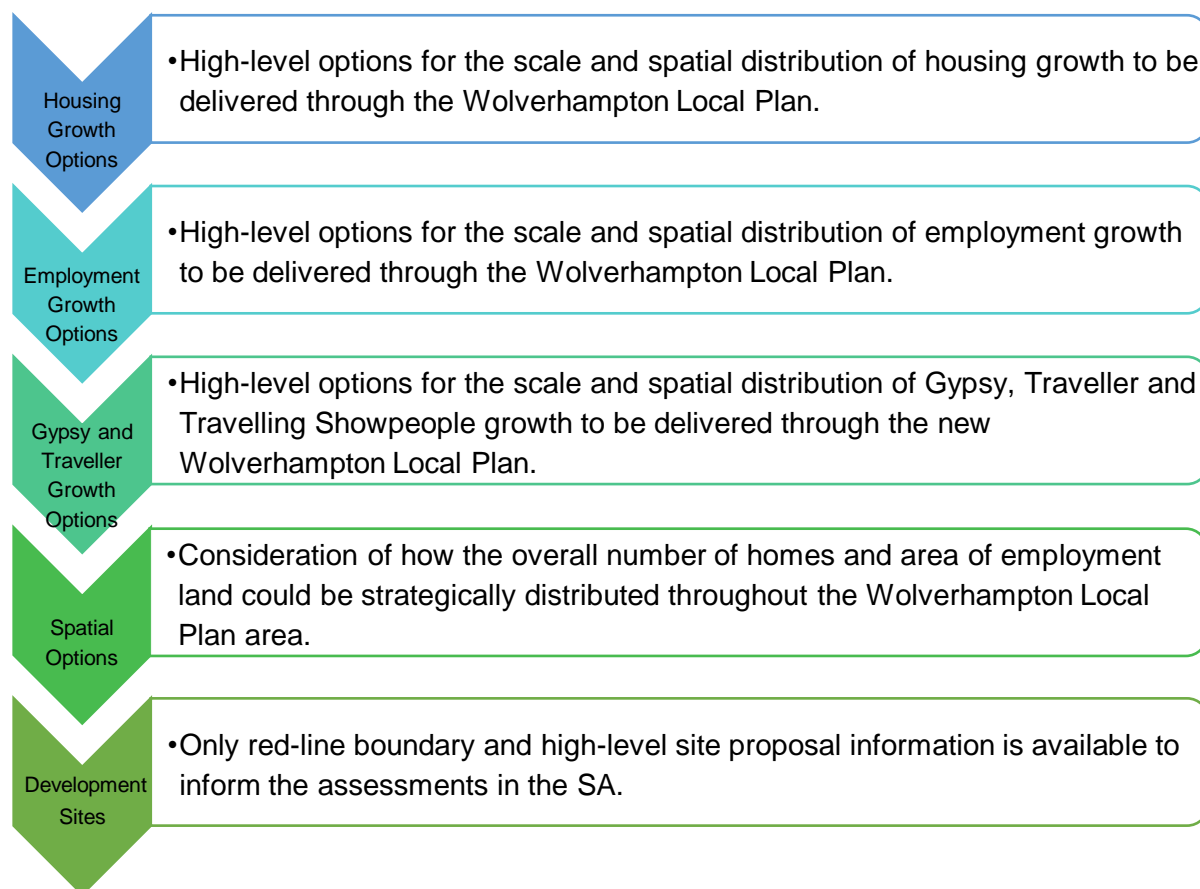


Figure N.5.1: Definitions for the different types of reasonable alternatives assessed in the SA process

N36. **Figure N.5.2** summarises the reasonable alternatives considered throughout the SA process, and where these alternatives have been identified, described and evaluated.

Quick guide to reasonable alternatives

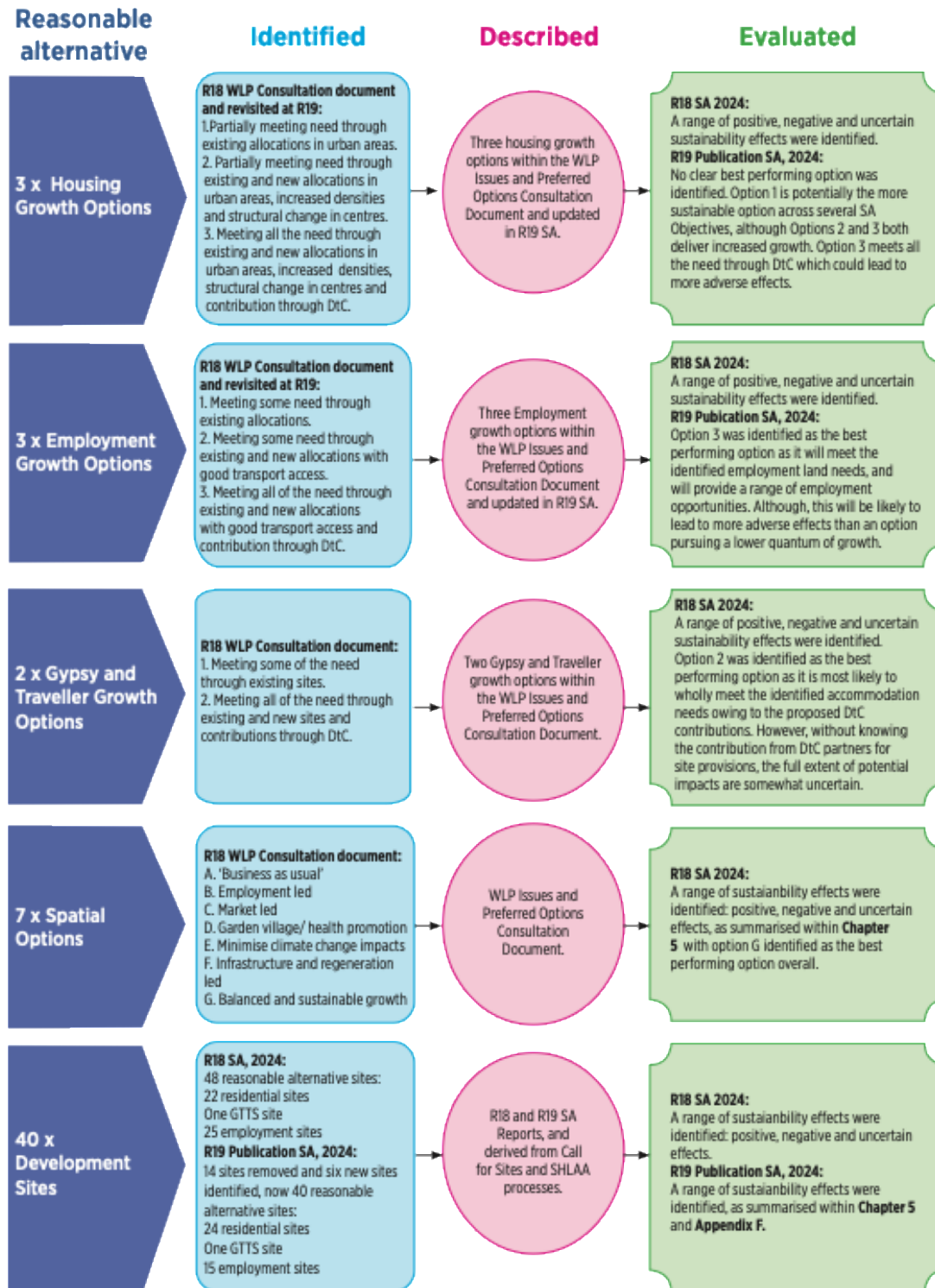


Figure N.5.2: The identification, description and evaluation of reasonable alternatives considered throughout the plan-making process

Housing growth options

N37. Housing growth options were first identified at the Regulation 18 stage. The three updated housing growth options identified by CWC at Regulation 19 are presented within **Table N.5.1**, factoring in the latest identified need and supply figures. The full assessments can be found in **Appendix D**, and are summarised in **Table N.5.2**.

Table N.5.1: Housing growth options identified by CWC

Option	Description of housing growth option	CWC assessment of option
Option H1	Carry forward existing housing allocations which focus housing growth in urban area: <ul style="list-style-type: none"> c.8,850 homes on existing supply in urban area 	<ul style="list-style-type: none"> Shortfall of 10,878 homes against housing need 2024-42 Sustainable pattern of development
Option H2	Carry forward existing housing allocations and make new allocations which focus housing growth in urban area, with increased density in accessible locations and structural change in Centres: <ul style="list-style-type: none"> c.8,850 homes on existing supply in urban area 61 homes on one new allocation (following discount) Around 419 homes from density uplift and structural change in Centres 	<ul style="list-style-type: none"> Shortfall of 10,398 homes against housing need 2024-42 Highly sustainable pattern of development
Option H3	Carry forward existing housing allocations and make new allocations which focus housing growth in urban area, with increased density in accessible locations and structural change in Centres, and export remaining housing need to neighbouring authorities: <ul style="list-style-type: none"> c.8,850 homes on existing supply in urban area 61 homes on one new allocation (following discount) c.419 homes from density uplift and structural change in Centres c.10,398 homes exported through Duty to Cooperate 	<ul style="list-style-type: none"> All of housing need 2024-42 met Highly sustainable pattern of development 35% cities and urban centres uplift of 5,115 homes met within Wolverhampton Existing and potential contribution offers from neighbouring authorities which have a strong relationship with Wolverhampton Birmingham and Black Country HMA Statement of Common Ground to address remaining unmet need

Table N.5.2: Summary SA assessment of housing growth options (extracted from Appendix D)

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Housing Growth Option	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
H1	+/-	+/-	-	-	+/-	+	-	-	++	+	-	++	++	++
H2	+/-	+/-	-	-	+/-	+	-	-	++	+	-	++	++	++
H3	+/-	+/-	--	--	+/-	+/-	--	--	+	++	+/-	+	+	+

Comment from Council: Considering the housing evidence and the SA findings, CWC concluded that *“The Preferred Option H3 is the only one of the three growth options which has the potential to meet housing need for Wolverhampton and meet national guidance on sustainable development”*.

Employment growth options

N38. Employment growth options were first identified at the Regulation 18 stage. The three updated employment growth options identified by CWC at Regulation 19 are presented within **Table N.5.3**, factoring in the latest identified need and supply figures. The full assessments can be found in **Appendix D** with a summary of identified positive and negative effects provided in **Table N.5.4**.

Table N.5.3: Employment growth options identified by CWC

Option	Description of employment option	CWC assessment of option
Option E1	Carry forward existing employment allocations: <ul style="list-style-type: none"> 33.65 ha on existing employment land supply in urban area. 	<ul style="list-style-type: none"> Shortfall of 92.75 ha against employment land need for Wolverhampton up to 2042 Shortfall of employment land across the Black Country FEMA as a whole. Sustainable pattern of development
Option E2	Carry forward existing employment allocations and make new employment allocations in locations suitable for employment use and with good transport access: <ul style="list-style-type: none"> 33.65 ha on existing employment land supply in urban area 9.25 ha on new allocations 	<ul style="list-style-type: none"> Shortfall of 83.5 ha against employment land need for Wolverhampton up to 2042 Shortfall of employment land across the Black Country FEMA as a whole. Sustainable pattern of development
Option E3	Carry forward existing employment allocations and make new employment allocations in locations suitable for employment use and with good transport access, and explore remaining employment land need to neighbouring authorities: <ul style="list-style-type: none"> 33.65 ha on existing employment land supply in urban area 9.25 ha on new allocations 83.5 ha exported through Duty to Cooperate 	<ul style="list-style-type: none"> All of employment land need for Wolverhampton up to 2042 met. Sustainable pattern of development Existing and potential contribution offers available from neighbouring authorities which have a strong relationship with Wolverhampton Existing and potential contribution offers available from neighbouring areas to address employment land need across the Black Country FEMA as a whole.

Table N.5.4: Summary SA assessment of employment growth options (extracted from **Appendix D**)

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Employment Growth Option	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
E1	+/-	+/-	-	+/-	-	0	-	+/-	+	0	-	0	+	+
E2	+/-	+/-	-	+/-	-	0	-	+/-	+	0	-	0	+	+
E3	+/-	+/-	-	+/-	-	0	--	+/-	+	0	+/-	0	++	+

Comment from Council: Considering the employment evidence and the SA findings, CWC concluded that “The Preferred Option E3 is the only one of the three growth options which has the potential to meet employment land needs for Wolverhampton, allow Duty to Cooperate requirements to be met for the Black Country FEMA, and meet national guidance on sustainable development”.

Gypsy and Traveller growth options

N39. Two options for Gypsy and Traveller growth have been identified by CWC (see **Table N.5.5**). The assessments are presented in full within the Regulation 18 Issues and Preferred Options SA Report¹⁰, and summarised in **Table N.5.6**.

Table N.5.5: *Wolverhampton Gypsy and Traveller growth options identified by CWC*

Option	Description of option	CWC assessment of option
Option G1	Make use of existing sites to deliver new gypsy and traveller pitches up to 2032: <ul style="list-style-type: none"> 2 pitches regularised on currently unauthorised site 12 pitches on existing allocated site 	<ul style="list-style-type: none"> 19 pitch shortfall against Wolverhampton gypsy and traveller pitch need up to 2032
Option G2	Make use of existing and potential new sites to deliver new gypsy and traveller pitches up to 2032: <ul style="list-style-type: none"> 2 pitches regularised on currently unauthorised site 12 pitches on existing allocated site 19 pitches exported through Duty to Cooperate 	<ul style="list-style-type: none"> No shortfall against Wolverhampton gypsy and traveller pitch need up to 2032

Table N.5.6: *Summary SA assessment of Gypsy & Traveller growth options (see the R18 SA Report)*

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Gypsy and Traveller Growth Option	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
G1	0	-	-	+/-	-	-	-	-	+	+	+/-	+	++	+
G2	0	-	-	+/-	-	-	-	-	+	++	+/-	+	++	+

Comment from Council: Considering the pitch need evidence and the SA findings, CWC concluded that *“The Preferred Option G2 is the only one of the two options which has the potential to provide the required 5 year supply of gypsy and traveller pitches for Wolverhampton and also meet national guidance on sustainable development”*.

Spatial options

N40. Drawing on the housing and employment growth options as discussed above, seven options for the spatial strategy have been identified by CWC (see **Table N.5.7**). The assessments are presented in full within the Regulation 18 Issues and Preferred Options SA Report¹¹, and summarised in **Table N.5.8**.

¹⁰ Lepus Consulting (2024) Sustainability Appraisal of the Wolverhampton Local Plan: Regulation 18 Issues and Preferred Options, January 2024. Available at: <https://www.wolverhampton.gov.uk/planning/planning-policies/wolverhampton-local-plan/evidence-plan-preparation-documents> [Date accessed: 01/10/24]

¹¹ Lepus Consulting (2024) Sustainability Appraisal of the Wolverhampton Local Plan: Regulation 18 Issues and Preferred Options, January 2024. Available at: <https://www.wolverhampton.gov.uk/planning/planning-policies/wolverhampton-local-plan/evidence-plan-preparation-documents> [Date accessed: 03/09/24]

Table N.5.7: Wolverhampton spatial options identified by CWC

Option	Description of spatial option	CWC assessment of option
Option A	“Business as Usual” – retain current housing and employment allocations in urban area and protect green belt.	<ul style="list-style-type: none"> As for Option H1 As for Option E1
Option B	Employment-Led - reconfigure uses in the urban area to promote local employment and mixed use; retain and intensify employment land and protect green belt.	<ul style="list-style-type: none"> As for Option H1 but with larger shortfall against housing need As for Options E2 & E3
Option C	Market-Led – only allocate housing in high demand areas and employment land in most attractive commercial locations	<ul style="list-style-type: none"> As for Option H1 but with larger shortfall against housing need As for Options E2 & E3 but without sites in less attractive commercial locations and therefore larger shortfall against employment land need
Option D	Garden Village / Health Promotion – protect all publicly accessible open space; provide lower density, mixed use housing developments with more on-site open space and residential services	<ul style="list-style-type: none"> As for Option H1 but with larger shortfall against housing need As for Options E2 & E3 but with larger shortfall against employment land need
Option E	Minimise Climate Change Impacts – only develop housing in locations with highest sustainable transport access to residential services, and only locate new employment land where good public transport access.	<ul style="list-style-type: none"> As for Options H2 & H3 but with larger shortfall against housing need As for Options E2 & E3 but without sites where not good public transport access and therefore larger shortfall against employment land need
Option F	Infrastructure and Regeneration-Led – Focus development in the central, north and east urban area of Wolverhampton, where development and infrastructure opportunities are concentrated and regeneration benefits can be maximised.	<ul style="list-style-type: none"> As for Options H2 & H3 but with larger shortfall against housing need As for Options E2 & E3
Option G	Balanced and Sustainable Growth – Focus development in the central, north and east parts of Wolverhampton, to minimise climate change impacts, make best use of existing infrastructure and support urban regeneration. Key features: increased housing density in the most accessible locations; more housing in Wolverhampton City Centre.	<ul style="list-style-type: none"> As for Option H2 & H3 As for Options E2 & E3

Table N.5.8: Summary SA assessment of spatial options (see the R18 SA Report)

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Spatial Option	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
A	0	-	0	+	+	+	-	-	+	+	-	-	+	+
B	0	0	0	+	+	+	-	-	+	+	-	-	++	+
C	-	-	-	-	-	-	-	-	-	+	-	0	+	-
D	-	0	0	-	0	-	-	-	0	+	0	+	+	0
E	0	-	0	+	0	0	-	-	++	+	-	-	+	++
F	0	+	0	+	0	0	-	-	+	+	+	-	++	+
G	0	+	0	+	0	0	-	-	+	++	+	-	++	++

Comment from Council: Considering the SA findings and other evidence base information, CWC concluded that *“The Preferred Option G: Balance and Sustainable Growth effectively forms a balance between the other six options and is the option which has the most potential to: provide sufficient land to meet Wolverhampton housing needs (both within Wolverhampton and in neighbouring authorities); provide sufficient employment land within Wolverhampton to meet employment land needs for Wolverhampton and allow Duty to Cooperate requirements to be met for the Black Country FEMA; and meet national guidance on sustainable development”*.

Reasonable alternative sites

- N41. At the Regulation 18 stage, 48 reasonable alternative sites were identified by CWC and evaluated in the Regulation 18 Issues and Preferred Options SA.
- N42. Following the Regulation 18 consultation in early 2024, CWC identified a further six reasonable alternative sites and updated boundaries / capacity changes for five sites. Some 14 reasonable alternative sites identified at the Regulation 18 stage have since been built out or granted planning permission and therefore no longer constitute reasonable alternatives. Therefore, at the Regulation 19 stage of plan making, there is now a total of 40 reasonable alternative sites, including:
- 24 sites proposed for residential use;
 - 15 sites proposed for employment use; and
 - One site proposed for Gypsy and Traveller use.
- N43. The full assessments can be found in **Appendix F**, with a summary of identified positive and negative effects provided in **Table N.6.7**.

Table N.5.9: Summary of positive and negative effects identified within the pre-mitigation site assessments

Identified positive effects	Identified adverse effects
<ul style="list-style-type: none"> • Sustainable access to local shops, healthcare and schools • Sustainable access to public transport, including buses and the railway network • Sustainable access to employment opportunities • Provision of new housing • Provision of employment floorspace • Large proportion of sites are located within Flood Zone 1 where fluvial flood risk is low • Sustainable access to greenspaces and to the Public Right of Way (PRoW) and cycle network 	<ul style="list-style-type: none"> • Exposure to poor air quality due to proximity to main roads and location of development within Wolverhampton AQMA • Increase of greenhouse gas emissions • Sites located in deprived areas • Location of development within areas of surface water flood risk • Impacts on local biodiversity designations • Changes to locally valued views • Alteration of the character or setting of cultural heritage assets • Increased production of waste associated with the proposed large-scale development • Loss of soil resources, undeveloped land or land with environmental value

Post-mitigation assessments of reasonable alternative sites

- N44. Mitigation using the emerging WLP policies (see **Appendix G** for the full assessments of the WLP policies) has been applied to the SA results for each reasonable alternative site and is presented in **Table N.7.1** and in full within **Appendix H** of the main report.

6 The preferred approach

Structure of the WLP

- N45. Following comments received during the Regulation 18 consultations and recommendations set out in the SA reports, CWC have prepared the Regulation 19 Publication Version of the WLP.
- N46. The WLP includes the following chapters which set out the overarching vision, strategic priorities, 55 strategic planning policies and 44 site allocation policies:
- Vision and strategic priorities;
 - Spatial strategy;
 - Infrastructure delivery;
 - Health and wellbeing;
 - Housing;
 - Economy;
 - The Wolverhampton Centres;
 - Transport;
 - Environment and climate change;
 - Waste;
 - Minerals;
 - Site Allocations; and
 - Monitoring and Review.

WLP Policies

- N47. The WLP includes 55 policies which have been assessed as part of the SA process. **Table N.6.1** below presents a summary of these assessments.
- N48. The WLP policies are generally anticipated to have positive impacts on the SA Objectives with negative impacts associated predominantly with pollution and waste, climate change mitigation and some for biodiversity and health. Uncertain impacts have mostly been identified where site-specific contextual information is lacking which could positively or adversely impact the chosen SA Objective.

Table N.6.1: Summary of policy assessments (extracted from **Appendix G**)

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CSP1	+	+	+	+	+	0	-	-	++	++	+	+	++	+
CSP2	++	++	+	+	+	0	+	0	+	+	+	+	+	0
DEL1	0	+	+	+	+	0	+	+	+	+	+	+	+	+
DEL2	0	0	0	0	0	+	0	0	+	+	0	0	+	0
DEL3	0	0	0	+	0	0	0	0	+	0	+	0	+	0

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
HW1	0	+	0	0	0	0	0	0	0	0	+	++	0	0
HW2	0	0	0	0	0	0	0	0	0	0	+	++	0	0
HW3	0	0	0	+	0	0	+	0	+	0	+	++	0	0
HOU1	0	0	0	-	0	+	-	-	0	++	+	0	0	0
HOU2	0	0	0	+	0	+	+	0	+	+	+	+	0	0
HOU3	0	0	0	0	0	0	0	0	0	+	+	+	0	0
HOU4	0	0	0	0	0	0	0	0	+	+	+	+	0	0
HOU5	0	+	+/-	+/-	+/-	+	-	-	+	+	+	+/-	+/-	+
HOU6	+	0	0	+	0	0	+	0	+	0	+	0	+	++
HOU7	0	0	0	0	0	0	0	0	+	+	+	+	0	0
EMP1	+/-	0	+/-	0	+/-	+	-	-	0	0	+	0	++	+
EMP2	+/-	0	0	-	0	+	-	-	+	0	+	-	+	+
EMP3	+/-	0	+/-	+/-	+/-	+	-	+	+	0	+	0	+	+
EMP4	+/-	0	+/-	-	+/-	+	-	-	+	+	+	0	+	+
EMP5	0	0	0	0	0	0	0	0	+	0	+	+	+	+
EMP6	+	+	+	0	0	0	0	0	+	0	+	0	+	+
CEN1	0	0	+/-	+/-	+/-	+	+/-	+/-	+	+	+	+	+	0
CEN2	+	+	+	+	+	+	+	0	++	+	+	+	++	+
CEN3	0	0	0	+	0	0	+	0	+	0	+	+	+	+
CEN4	0	0	0	+	0	0	+	0	+	0	0	+	+	0
TRAN1	0	0	0	+	0	0	+	0	++	0	0	+	0	0
TRAN2	0	0	0	0	0	0	0	0	+	0	0	0	0	0
TRAN3	0	0	0	+	0	0	+	0	+	0	0	0	0	0
TRAN4	0	0	-	0	0	0	0	0	+	0	0	0	0	0
TRAN5	0	0	0	+	0	0	+	0	+	0	0	+	0	0
TRAN6	0	0	0	+	0	0	+	0	+	0	0	+	0	0
TRAN7	0	0	0	+	0	0	+	0	+	0	0	+	+	0
TRAN8	0	0	0	+	0	0	+	0	+	0	0	0	0	0
ENV1	0	+	++	+	+	0	+	0	0	0	0	+	0	0
ENV2	0	0	++	0	0	0	0	0	0	0	0	+	+	0
ENV3	0	+	++	+	+	0	+	0	0	0	0	+	0	0
ENV4	+	+	++	+	++	+	+	0	0	0	0	+	0	0
ENV5	++	+	+	0	0	0	0	0	0	0	+	0	+	0
ENV6	+	+	+	0	0	0	0	0	0	0	0	0	+	+
ENV7	+	+	+	0	0	0	+	0	+	+	0	+	+	0
ENV8	0	+	+	+	+	+	+	0	+	0	+	++	0	0
ENV9	0	+	+	+	+	0	+	0	+	0	+	+	0	0
ENV10	+	++	+	+	+	+	+	0	+	0	+	+	0	0
ENV11	0	0	+	+	0	0	++	0	+	0	0	+	+	0
ENV12	0	0	+	0	++	+	+	0	0	0	0	+	0	0
ENV13	0	+	+	+	++	+	+	0	0	0	0	0	0	0
ENV14	0	0	0	+	+	+	+	0	0	0	+	+	0	0
W1	0	0	0	0	0	+	0	++	0	0	0	0	+	0
W2	0	0	0	0	0	+	0	+	0	0	0	0	0	0
W3	+/-	+/-	+/-	-	+/-	+	-	+	+	0	0	+/-	+	0
W4	0	0	0	0	0	0	0	+	0	0	0	0	0	0

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
W5	0	0	0	0	0	+	0	++	0	0	0	0	0	0
MIN1	0	0	0	0	0	+	0	0	0	0	0	0	+	0
MIN2	0	0	0	0	0	+	0	0	0	0	0	0	0	0
MIN3	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Site allocations

- N49. The SA process has been used to evaluate reasonable alternative sites on a comparable basis against the SA Framework to identify likely sustainability impacts. It is the role of CWC to use the SA findings, alongside other evidence base material, to decide which sites to ‘select’ for allocation in the WLP and which to ‘reject’ from further consideration (see **Appendix I** for more details).
- N50. A total of 44 sites have been selected for allocation in the WLP by CWC, with site allocation policies prepared for each to provide further site-specific detail and mitigation, beyond that contained in the 55 strategic planning policies. Each policy has been evaluated in the SA process within **Appendix J**.
- N51. For many of the site policies, the assessments have resulted in the identification of further minor positive impacts or a reduction in negative impacts for landscape (SA Objective 2) and biodiversity (SA Objective 3), specifically for policies which introduce requirements for high-quality design across the site and any additional measures such as natural landscaping. The majority of scores across the SA Objectives remained unchanged from the post-mitigation assessments.
- N52. The impact matrices for the site policy assessments are presented in **Table N.6.2** below. More detailed narrative on the site policy assessments can be found in **Appendix J**.

Table N.6.2: Summary of site policy assessments (extracted from **Appendix J**)

Site Policy	1 Cultural Heritage	2 Landscape	3 Biodiversity	4 CC Mitigation	5 CC Adaptation	6 Natural Resources	7 Pollution	8 Waste	9 Transport	10 Housing	11 Equality	12 Health	13 Economy	14 Education
H1	0	+	0	-	+	+	-	0	++	++	0	++	++	++
GT1	0	0	0	+/-	+	-	-	+/-	++	+	0	+	++	++
E1	0	0	0	+/-	+	-	-	+/-	+	0	0	+	++	0
E2	0	0	0	+/-	0	-	-	+/-	++	0	0	++	++	0
E4	0	0	0	+/-	+	-	-	+/-	++	0	0	++	++	0
E6	0	+	0	+/-	+	-	-	+/-	++	0	0	++	++	0
E7	0	+	0	+/-	+	-	-	+/-	++	0	0	++	++	0
E8	0	0	0	+/-	+	-	-	+/-	++	0	0	++	++	0
H2	0	+	0	0	+	-	-	0	++	+	0	++	++	++
H3	0	+	0	-	+	-	-	-	++	++	0	++	++	++
H4	0	+	0	-	+	+	-	-	++	++	0	+	++	++
H5	0	+	0	0	+	+	-	0	+	+	0	++	++	++
H6	0	+	0	0	+	+	-	0	++	+	0	++	++	++
H7	0	+	0	+/-	+	+	-	0	++	0	0	++	++	++
E12	0	+	0	+/-	+	-	-	+/-	+	0	0	++	++	0
E13	0	+	0	+/-	+	-	-	+/-	++	0	0	++	++	0
H8	0	+	0	-	+	+	-	-	++	++	0	++	++	++
H9	0	+	0	0	+	+	-	0	++	++	0	++	++	++
H10	0	+	0	-	+	+	-	-	++	++	0	++	++	++
H11	0	+	0	0	+	+	-	0	++	+	0	++	++	++
H12	0	+	0	0	+	-	-	0	++	+	0	++	++	++
H13	0	+	0	0	+	+	-	0	++	+	0	++	++	++
H14	0	+	0	0	+	+	-	0	+	+	0	++	++	++
H15	0	+	0	-	+	+	-	-	++	++	0	++	++	++
H16	0	0	0	0	+	-	-	0	++	++	0	++	++	++
H17	0	+	0	0	+	-	-	0	++	+	0	++	++	++
H18	0	+	0	0	+	-	-	0	++	+	0	++	++	++
H19	0	+	0	0	+	-	-	0	++	+	0	++	++	++
E14	0	+	0	+/-	+	-	-	+/-	+	0	0	++	++	0
E15	0	+	0	+/-	+	+	-	+/-	++	0	0	++	0	0
E16	0	0	0	0	0	0	0	0	0	0	0	0	0	0
E17	0	0	0	+/-	+	-	-	+/-	+	0	0	++	++	0
E18	0	+	0	+/-	+	+	-	+/-	++	0	0	++	++	0
E20	0	0	0	+/-	+	+	-	+/-	+	0	0	+	++	0
E21	0	+	0	+/-	+	-	-	+/-	+	0	0	+	++	0
E22	0	+	0	+/-	+	-	-	+/-	+	0	0	++	++	0
E23	0	+	0	+/-	0	-	-	+/-	++	0	0	++	++	0
E24	0	+	0	+/-	+	+	-	+/-	++	0	0	++	++	0
E25	0	0	0	+/-	0	-	-	+/-	++	0	0	+	++	0
H20	0	+	0	0	+	-	-	0	+	+	0	++	++	++
H21	0	+	0	0	0	-	-	0	+	+	0	++	++	++
H22	0	+	0	0	+	-	-	0	++	+	0	++	++	++
H23	0	+	0	0	+	-	-	0	++	+	0	++	++	++
H24	0	+	0	+/-	0	-	-	0	++	+	0	++	++	++

7 Likely significant effects on the environment



Identified impacts, mitigation and residual effects



- N53. Proposals in the WLP have been assessed for their sustainability impacts, the results of which are presented in the relevant appendices and/or report chapters as described in the above NTS chapters. The assessment of the WLP, including reasonable alternatives, was undertaken using a combination of available evidence and professional judgement.
- N54. **Table N.7.1** provides an overview of the evaluation of the WLP against the SEA topics as provided in the main Regulation 19 SA Report.
- N55. The second column of **Table N.7.1** provides a summary of the potential negative impacts of the WLP relating to each of the sustainability themes (as set out in full within **Chapters 7-15** of the main SA Report, **Volume 2**). These are impacts that have been identified prior to the implementation of WLP mitigation.
- N56. Column three of **Table N.7.1** summarises the effects of the 55 WLP policies which are expected to mitigate or help to reduce some of the potentially negative impacts.
- N57. In some cases, the WLP policies are likely to fully mitigate identified effects or lead to longer term benefits. The WLP policies, however, are not anticipated to fully mitigate all of the identified effects. The residual effects are identified and drawn to the attention of the plan makers and summarised in the final column of **Table N.7.1**.



Cumulative effects


- N58. The cumulative effects assessment (CEA) is the process of identifying and evaluating the effects that arise when the total significant effects of the Local Plan and assessed alongside known existing underlying trends and other PPPs.
- N59. Cumulative effects are different from effects that occur alone. Alone, the Plan may not result in residual adverse effects for a particular topic, for example the effects of urban sprawl on landscape character, but when considered cumulatively, may result in significant effects that require mitigation or monitoring.
- N60. Cumulative effects of the WLP are discussed in **Table N.7.1** alongside the identified residual effects, with the full CEA provided in **Chapter 18** of the main Regulation 19 SA Report.



Table N.7.1: Summary of identified impacts, mitigation and residual effects of the Wolverhampton Local Plan

Sustainability theme	Potential impacts of the WLP	Mitigating WLP policies	Summary of residual effects
 AIR	<ul style="list-style-type: none"> Increased pollutant emissions, such as NO₂ and particulate matter, from the construction and occupation of new development and associated traffic. Exposure of human and biodiversity receptors to poor air quality whereby increased pollutant levels can affect respiratory health and lead to adverse effects on vulnerable habitats. 	<p>Policy ENV11 'Air quality' promotes a comprehensive approach to addressing poor air quality, supported by transport policies including TRAN1 'Priorities for the development of the Transport Network', TRAN5 'Creating coherent networks for cycling and walking', TRAN6 'Influencing the demand for travel and travel choices', TRAN7 'Parking management' and TRAN8 'Planning for low emission vehicles' which support lower emissions through reducing congestion and encouraging active and sustainable methods of travel rather than cars.</p> <p>Policy ENV14 'Energy and sustainable design' will encourage air quality improvements through supporting energy efficient homes with reduced domestic emissions.</p> <p>Various policies including ENV2 'Nature conservation', ENV4 'Trees and hedgerows', ENV8 'Open space, sport and recreation' and ENV10 'High quality design' will encourage increased GI coverage that may help to screen people from pollution and filter air pollutants.</p>	<ul style="list-style-type: none"> Despite the positive provisions of the WLP policies, alongside other regional and national strategies, a cumulative residual adverse effect on humans and biodiversity receptors due to poor air quality is likely to remain. Over time, this adverse impact is likely to be reduced to some extent should there be an increase in sustainable transport methods and a phasing out of petrol and diesel-powered cars by 2035, alongside other advances in technology. The long-term effect on emissions and air quality is likely to be positive, but short-term negative effects are expected.
 BIODIVERSITY, FLORA & FAUNA	<ul style="list-style-type: none"> Threats or pressures to European sites including Cannock Chase SAC (see the HRA for more details). Threats or pressures to nationally or locally designated biodiversity sites, including from recreational disturbance or increased water/air pollution from visitors to the sites. Fragmentation of the ecological network including priority habitats. 	<p>Policies ENV1 'Nature conservation', ENV2 'Development affecting Cannock Chase Special Area of Conservation', ENV3 'Nature conservation and biodiversity net gain', ENV8 'Open space and recreation', ENV9 'Playing fields and sports facilities', and ENV10 'High quality design' will help to ensure that designated biodiversity sites and habitats are conserved, biodiversity net gain (BNG) is implemented, and GI, ecological networks and the Local Nature Recovery Strategy throughout Wolverhampton are supported and expanded, which will support enhanced biodiversity and nature recovery.</p>	<ul style="list-style-type: none"> The WLP policies regarding biodiversity will be expected to mitigate potential adverse impacts at the majority of sites and ensure protection of European and nationally designated sites; however, residual adverse effects on locally designated and non-statutory biodiversity sites are anticipated where there is potential for direct habitat loss or degradation due to development sites which coincide with or are directly adjacent to SINC/SLINC. Policies within the WLP are likely to encourage ecological connectivity and as such are likely to lead to a longer-term positive effect on biodiversity and the ecological network.

Sustainability theme	Potential impacts of the WLP	Mitigating WLP policies	Summary of residual effects
 <p>CLIMATIC FACTORS</p>	<ul style="list-style-type: none"> Some new development is located in areas of higher fluvial and surface water flood risk where there may be increased risks to human health or damage to properties. Increased GHG emissions due to the construction and occupation of new development and associated traffic. Loss of multi-functional green infrastructure that may reduce resilience to climate change. 	<p>Policies ENV12 'Flood risk and water quality', ENV13 'Sustainable drainage and surface water management', ENV10 'High quality design' and other GI-focused policies will help to reduce fluvial and surface water flood risk through the application of the sequential test, natural flood management measures and the incorporation of multifunctional GI and SuDS to slow run-off rates.</p> <p>Transport related policies including TRAN1 'Priorities for the development of the Transport Network', TRAN5 'Creating coherent networks for cycling and walking', TRAN6 'Influencing the demand for travel and travel choices' and TRAN8 'Planning for low emission vehicles' as well as ENV11 'Air quality' will reduce congestion and encourage active and sustainable methods of transport which will support lower GHG emissions, reducing contribution to the causes of climate change.</p> <p>Policy ENV14 'Energy and sustainable design' will support the use of renewable energy and low emission technologies which could reduce reliance on fossil fuels and associated emissions.</p>	<ul style="list-style-type: none"> CWC has ensured that development is directed in the first instance towards sites at the lowest risk of flooding based on the Strategic Flood Risk Assessment (SFRA) following national guidance and as such there is anticipated to be no significant adverse effect on the risk of flooding. An increase in GHG emissions as a result of the proposed development is expected to have a cumulative and long-term significant adverse effect on exacerbating the risks of climate change. Through supporting the provision of GI across the Plan area and mitigating potential harmful impacts of development, a positive overall effect is identified in terms of promoting resilience to climate change in Wolverhampton.
 <p>CULTURAL HERITAGE</p>	<ul style="list-style-type: none"> The introduction of new development may lead to changes in the character and/or setting of designated heritage assets New development may also lead to adverse effects on historic character 	<p>Policies CPS2 'Placemaking: achieving well designed places', CEN2 'Wolverhampton's centres' and ENV10 'High quality design' seek to protect and enhance historic character and local distinctiveness through ensuring high quality design of new development that is appropriate to its setting.</p> <p>Policy ENV5 'Historic character and local distinctiveness' requires all development to conserve and enhance both designated and non-designated heritage assets.</p> <p>Policies ENV6 'Geodiversity and the Black Country Global Geopark' and EMP6 'Cultural facilities and the visitor economy' seek to protect geological and historical assets through encouraging heritage related tourism.</p>	<ul style="list-style-type: none"> The WLP policies can be expected to help avoid or mitigate effects on designated heritage assets which may arise from proposed WLP development, with a negligible impact expected overall. Overall, a positive effect is identified in terms of protecting Wolverhampton's historic character and encouraging high quality design and regeneration that conserves and enhances historic, archaeological and architectural features.

Sustainability theme	Potential impacts of the WLP	Mitigating WLP policies	Summary of residual effects
 <p>HUMAN HEALTH</p>	<ul style="list-style-type: none"> A small number of allocations are situated in areas with limited sustainable access to healthcare facilities Exposure to air/noise pollution (from AQMAs/main roads) with implications for health Net loss of public greenspace where some allocations coincide with current open spaces 	<p>Transport and air quality policies as discussed in the ‘air’ and ‘population and material assets’ sections will help to reduce air pollution and ensure residents in have access to healthcare facilities including through sustainable and active transport options.</p> <p>Policies HW1 ‘Health and wellbeing’, HW2 ‘Health Impact Assessments’ and HW3 ‘Healthcare facilities’ seek to ensure the provision of adequate healthcare facilities for existing and future residents as well as ensuring new developments carry out a Health Impact Assessment.</p> <p>Policies HOU4 ‘Housing for people with specific needs’ and HOU10 ‘Housing density, type and accessibility’ seek to ensure the provision of adequate accommodation to meet all the needs of Wolverhampton’s residents.</p> <p>Policies ENV8 ‘Open space and recreation’, ENV9 ‘Playing fields and sports facilities’ and CSP2 ‘Placemaking: achieving well designed places’ seek to ensure the provision of GI and open green space to ensure residents have access to these spaces to support mental and physical health and wellbeing.</p>	<ul style="list-style-type: none"> A negligible impact is identified for sustainable access to healthcare facilities as a result of the provision for sustainable and active methods of transport and WLP policies that will help to prevent the loss of existing facilities. Exposure to poor air quality and noise pollution across Wolverhampton is expected to be a cumulative residual adverse effect on human health, although the extent of this impact may reduce over time as clean technologies improve. Through supporting the provision of green spaces to compensate for any losses associated with development sites, a negligible effect is identified in terms of access to green spaces.
 <p>LANDSCAPE</p>	<ul style="list-style-type: none"> Threaten or result in the loss of locally distinctive or sensitive landscapes New development may lead to changes in views from local residents or users of the PRoW network 	<p>Policies CSP2 ‘Placemaking: achieving well designed places’, CEN2 ‘Wolverhampton’s centres’, ENV10 ‘High quality design’ and ENV5 ‘Historic character and local distinctiveness’ will ensure that new development is in keeping with the surrounding landscape and enhances the distinctive local character as well as maintaining views into and out of development.</p> <p>Policies ENV4 ‘Trees and hedgerows’, ENV7 ‘Canal network’, ENV8 ‘Open space and recreation’ and ENV9 ‘Playing fields and sports facilities’ will maintain the landscape character of the Plan area through the incorporation of GI and open green space, as well as the canal network which forms a central part of Wolverhampton’s landscape and townscape character.</p>	<ul style="list-style-type: none"> A cumulative positive effect on the landscape can be expected, particularly where developments seek to enhance Wolverhampton’s landscape, townscape and historic environment. The WLP policies will be expected to ensure that potential adverse impacts on views are avoided, and developments will be encouraged to pursue high quality design which conserves and enhances visual amenity and other key views across the city, leading to potential for a positive overall effect.

Sustainability theme	Potential impacts of the WLP	Mitigating WLP policies	Summary of residual effects
 <p>POPULATION & MATERIAL ASSETS</p>	<ul style="list-style-type: none"> The WLP needs to ensure the provision of housing and employment opportunities to meet local need A small number of allocations are situated in areas with limited sustainable access to services and facilities Increased pressure on local services from new development Some development is located in deprived areas where there are inequalities to be addressed Increased household waste generation 	<p>Policies HOU1 'Delivering sustainable housing growth', HOU2 'Housing density, type and accessibility' and HOU3 'Delivering affordable, accessible and self-build/custom build housing' will ensure the provision of accommodation to meet the needs of residents.</p> <p>Policies EMP1 'Providing for economic growth and jobs', EMP2 'Strategic Employment Areas', EMP3 'Local Employment Areas', EMP4 'Other Employment Areas' and EMP6 'Cultural facilities and the visitor economy' seek to ensure there is a range of employment opportunities within Wolverhampton, which are accessible for residents particularly in deprived areas.</p> <p>Policies TRAN1 'Priorities for the development of the Transport Network', TRAN2 'Safeguarding the development of the Key Routes Network', TRAN3 'Managing transport impacts from new development', TRAN5 'Creating coherent networks for cycling and for walking' and TRAN6 'Influencing the demand for travel and travel choices' seek to maintain and improve the travel network throughout Wolverhampton ensuring residents have sustainable access to services and facilities including via active travel and public transport.</p> <p>Various Centre-based policies including CEN3 'Provision of local facilities' ensure the protection and enhancement of services to meet residents' needs. Policy HOU6 'Education facilities' supports an enhanced network of education facilities across Wolverhampton, addressing accessibility gaps.</p> <p>Policies W1 'Waste infrastructure - future requirements', W2 'Safeguarding waste sites', W3 'Locational requirements for new waste facilities' and W4 'Key considerations for waste developments' seek to ensure there is adequate capacity to efficiently manage and process household waste generated in Wolverhampton.</p>	<ul style="list-style-type: none"> The WLP aims to make a significant contribution to meeting the identified housing and employment needs in Wolverhampton. Coupled with DtC contributions, the WLP is likely to result in a positive cumulative residual effect on people and the economy. A positive residual effect is anticipated for sustainable access to local services and facilities through the provision of active and sustainable transport. A negligible impact is expected with regard to increased pressure on local services and facilities as a result of increased provision and infrastructure through the WLP. The WLP policies can be expected to improve community cohesion through increasing opportunities for social interaction, fostering a sense of place and reducing social inequalities. Overall, a positive cumulative residual effect on equality is anticipated. The impact of increased household waste generation on the capacity of waste management facilities is expected to lead to an adverse short to medium term cumulative residual effect on waste.

Sustainability theme	Potential impacts of the WLP	Mitigating WLP policies	Summary of residual effects
 <p>SOIL</p>	<ul style="list-style-type: none"> • Direct loss of soil resources due to construction of new development which contains previously undeveloped land 	<p>Under Policy CSP1 'Spatial Strategy' the majority of new development will be located within the existing urban areas. This will promote an efficient use of land, protect previously undeveloped land and reduce the loss of soil resources.</p> <p>Several policies including ENV1 'Nature conservation', ENV3 'Nature recovery and biodiversity net gain', ENV4 'Trees and hedgerows' and ENV8 'Open space, sport and recreation' will protect open spaces and further expand and integrate the ecological / GI network within the borough with multifunctional ecosystem service functions including maintaining soil structure, prevented loss of soil through flooding and reducing soil erosion.</p>	<ul style="list-style-type: none"> • The loss of approximately 10.25ha of previously undeveloped land as a result of the WLP allocations is expected to be a cumulative and permanent adverse effect on soil resources that may lead to secondary effects such as increased flood risk and soil erosion.
 <p>WATER</p>	<ul style="list-style-type: none"> • Reduction in water quality and ecosystem services due to increased run-off of pollutants • Increased demand for water and wastewater management due to new development 	<p>Policies ENV12 'Flood risk and water quality', ENV13 'Sustainable drainage systems and surface water management' and ENV7 'Canal network' will ensure development is designed to protect and enhance water quality, and will ensure SuDS are integrated into new development that can reduce run-off and lead to wider benefits for water quality.</p> <p>Policies such as ENV1 'Nature conservation', ENV3 'Nature recovery and biodiversity net gain', ENV4 'Trees and hedgerows', ENV8 'Open space and recreation', and ENV9 'Playing fields and sports facilities' will provide enhanced GI with multifunctional ecosystem service functions which alleviate flood risk and support water filtration and the absorption of run-off.</p>	<ul style="list-style-type: none"> • Deterioration in water quality and ecosystem services owing to the planned growth increasing the likelihood of pollutant runoff has the potential to be a cumulative long-term but potentially reversible residual effect. • Increased pressure and demand for water and wastewater management as a result of the WLP growth, especially in light of climate change increasing the occurrence of storm overflow events, has the potential for long-term but potentially temporary significant effect depending on upgrades to current infrastructure that may occur during the lifetime of the Plan.

Conclusions

- N61. Overall, the WLP is anticipated to result in positive effects on sustainability including those associated with the provision of homes, employment and supporting infrastructure to meet needs, promoting sustainable and active travel and ensuring development helps to create a high quality built and natural environment.
- N62. Identified adverse effects largely relate to the potential for the growth proposed in the WLP to cumulatively lead to an increase in GHG emissions, waste, air and water pollution, and loss of soil resources. This covers some issues which the WLP cannot fully address alone, such as the increased frequency of storm events associated with climate change resulting from national and international trends beyond Wolverhampton.
- N63. It will be important to ensure effective monitoring is in place so that CWC can respond to these effects during the lifetime of the WLP.

Monitoring

- N64. Monitoring proposals are set out in **Table N.7.3** for CWC to consider in the implementation of the WLP.

Table N.7.2: *Proposals for monitoring adverse sustainability impacts of the WLP*

SEA topic	Indicator	Scale and frequency	Target
Air	Concentration of NO ₂ and PM ₁₀	Annually, Plan area wide	Decrease
Air	Traffic flows on main roads	Bi-annually, Plan area wide	Decrease
Air	Rates of public transport uptake	Annually, Plan area wide	Increase
Biodiversity, flora and fauna	Percentage of SSSIs in favourable condition	Annually, Plan area wide	Increase
Biodiversity, flora and fauna	Number of planning approvals granted contrary to the advice of Natural England or Birmingham and Black Country Wildlife Trust	Annually, Plan area wide	Zero
Biodiversity, flora and fauna	Percentage loss of the ecological network	Annually, Plan area wide	Zero
Biodiversity, flora and fauna	Quality and extent of priority habitats	Annually, Plan area wide	Increase
Biodiversity, flora and fauna	Canopy cover within Wolverhampton	Every 3 to 4 years, Plan area wide	20% by 2035
Biodiversity, flora and fauna	Uplift in biodiversity net gain units within Wolverhampton	Annually, Plan area wide	Increase
Climatic factors	CO ₂ emissions per capita	Annually, Plan area wide	Decrease
Climatic factors	Percentage of energy generated from renewable sources	Annually, Plan area wide	Increase
Climatic factors	Number of properties at risk of flooding	Annually, Plan area wide	Decrease
Climatic factors	Extent of surface water flood risk	Annually, Plan area wide	Decrease
Climatic factors	Fluvial flood risk along the Smestow Brook	Annually, Plan wide area	Decrease

SEA topic	Indicator	Scale and frequency	Target
Cultural heritage	Number of conservation area appraisals	Annually, Plan area wide	Increase
Cultural Heritage	Number of heritage assets identified as 'heritage at risk'	Annually, Plan area wide	Decrease
Human health	Percentage of physically active adults	Bi-annually, Plan area wide	Increase
Human health	Number of GP surgeries	Annually, Plan area wide	Increase
Human health	Hectares of accessible open space per 1,000 population	Annually, Plan area wide	Increase
Landscape	Quantity of development in sensitive landscapes	Annually, Plan area wide	Zero
Landscape	Quality and extent of green infrastructure	Annually, Plan area wide	Increase
Population and material assets	Number of affordable housing completions	Annually, Plan area wide	Increase
Population and material assets	Percentage of economically active residents	Annually, Plan area wide	Increase
Population and material assets	LSOAs in Wolverhampton within the 10% most deprived in Great Britain	Every 3 to 4 years, Plan area wide	Decrease
Population and material assets	Quantity of household waste sent to landfill	Annually, Plan area wide	Decrease
Soil	Number of dwellings built on previously developed or brownfield land	Annually, Plan area wide	Increase
Soil	Area of contaminated land remediated	Annually, Plan area wide	Increase
Water	Number of planning permissions granted contrary to Environment Agency advice	Annually, Plan area wide	Zero
Water	Number of waterbodies classified as 'good' ecological status	Annually, Plan area wide	Increase
Water	Number of overflow events of untreated sewage discharges into rivers	Annually, Plan area wide	Zero
Water	Water efficiency in new homes	Annually, Plan area wide	Increase
Water	Water availability for extraction	Annually, Plan area wide	Increase

Consultation and next steps

- N65. The Regulation 19 SA Report will be published alongside the Publication Version of the Wolverhampton Local Plan.
- N66. A minimum of a six-week period of consultation will be undertaken by CWC to offer statutory consultees, stakeholders, organisations and individuals an opportunity to submit representations regarding the WLP, as well as supporting evidence including this SA Report.
- N67. Following this round of consultation, all comments will be analysed by the plan makers as part of the ongoing plan making process. Further stages of SA will be prepared if and when necessary.



Lepus Consulting
Eagle Tower
Montpellier Drive
Cheltenham
Gloucestershire GL50 1TA

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