



**Staffordshire  
Wildlife Trust**

## **Response to South Staffordshire Council Local Plan Review 2018-2038 Preferred Options Consultation, November 2021**



*Kate Dewey MCIEEM and Liz Peck, 13th December 2021*

**Question 1:**

**Do you agree that the evidence base set out in Appendix A is appropriate to inform the new Local Plan? Yes/No**

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

ID: 814

Type: Object

**Summary:**

There are a number of additional elements that would enable the plan to deliver the requirements of national policy, and better achieve environmental net gain.

Further ecological evidence base on particular ecological assets and accessible natural greenspace, a Local Nature Recovery Strategy, GI strategy and further evidence base to support measurable biodiversity net gain.

**Full Text:**

There are a number of additional elements that would enable the plan to deliver the requirements of national policy, and better achieve environmental net gain.

A Local Nature Recovery Strategy would build on the Nature Recovery Network mapping evidence base to provide policy and firm actions to deliver biodiversity enhancements in key locations, where they will also provide nature-based solutions and benefits for people. Currently, the plan does not fully 'take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.' as advised by the National Planning Policy Framework and Planning Practice Guidance.

A Green Infrastructure Strategy would also be very useful to bring together a range of issues such as biodiversity, flood management, access to nature, recreation, landscape and heritage into an integrated multi-functional plan, which could then be delivered through the IDP.

Access to nature, on the doorstep and further afield, is central to our wellbeing both mentally and physically. An audit and mapping of Accessible Natural Greenspace, in line with standards published by Natural England, should be undertaken to show where deficits or opportunities lie. This would aid site allocation decisions and green infrastructure planning.

Further work is needed to identify site-specific ecological constraints and opportunities, as information on allocation sites is currently not sufficient to make informed and accurate decisions on site selection, net developable area achievable, and viability.

### **Ecology Evidence Base**

While the current evidence base displays the primary ecology evidence available to date, new requirements in national policy, progress in mapping analysis and the need for site-specific decision making means that ongoing work is required to build on the current evidence. required for strategic policy, and to inform local allocations. We have considered the NPPF and Planning Practice Guidance, as well as the recently passed Environment Bill in forming our comments.

### **Wildlife corridors and stepping stones connecting designated sites**

The South Staffordshire Nature Recovery Network Mapping Report 2020 opportunity maps show large scale corridors and stepping stones, and strategic habitat creation areas. However, clearer key corridors, that could be a focus for specific policies, could be drawn out by producing a Habitat Corridors Map. This would also enable site-specific decisions to be informed by potential impacts, or benefits to, important corridors.

### **Distribution of protected and priority habitats and species**

Known priority habitats have been mapped; however data is not necessarily complete for the whole district, and where this information is critical to site-specific or policy decisions, further survey is advised to ensure all priority habitats have been identified.

Priority species are part of the NRN mapping, and are included in some habitat distinctiveness definitions; however it may be valuable to use species data further, to highlight areas of special significance e.g. for priority farmland birds, reptiles and invertebrates which are all key features of the district.

### **Irreplaceable habitats**

Not all irreplaceable habitats (IH) have yet been identified across Staffordshire, for example work is ongoing to update data on smaller ancient woodlands that are not yet recorded on the national register. Veteran trees are also not comprehensively mapped, but could be included in the evidence base. Other habitats such as lowland fen and peatlands would potentially also qualify as irreplaceable, and could be highlighted more strongly within the mapping. Updated guidance from Natural England on how to define, and therefore identify, irreplaceable habitats is expected in 2022, and the LPA should be prepared that additional data collection may be needed to ensure these habitats are recognised and avoided in critical locations. This is particularly important as IH cannot be included in biodiversity net gain.

### **Areas of geological value which would benefit from enhancement and management**

Important geological sites are not covered specifically within the NRN mapping, or within the landscape or historic evidence base, although some may overlap with designated wildlife sites. Geodiversity is an important element in understanding the landscape and history of an area, and can coincide with

important habitats, so gathering an appropriate evidence base should be considered.

### **Areas identified by national and local partnerships for habitat management, enhancement, restoration or creation**

The evidence base would benefit from including local partnership projects e.g. Heathland/ Sandland project area connecting Kinver Edge SSSI with Highgate Common SSSI, involving SWT, the National Trust and Natural England. The River Penk corridor is also an area of focus for natural flood management. There are likely to be many initiatives ongoing of varying size amongst partners. As part of a Local Nature Recovery Strategy, such areas could be and supported via plan policies and infrastructure delivery.

### **Allocate land with the least environmental or amenity value**

While the current evidence base gives some indication of the value of specific sites within the nature network, and known/ likely distinctiveness, this mapping was designed to identify broad priorities and areas for BNG. It can help inform site selection, but does not provide sufficient evidence for specific sites. Not all priority habitats or sites worthy of designation have been identified across the district, and so further data on specific site constraints is required in order that decisions are fully informed.

### **Measureable Net Biodiversity Gain (BNG)**

Current national guidance sets out a number of aspects required to achieve BNG; this will also be updated in light of the Environment Bill. This means that evidence base to enable BNG will need to be extended and further detail added.

Plans should: Set out which areas have best opportunities to deliver gains; consider local sites including where communities could benefit from improved access to nature; identify and pursue opportunities for securing measurable net gains for biodiversity.

Strategic habitat creation areas have been broadly identified, but could be further honed to select priority areas for enhancement. Some feasible sites have been identified (Tier 1 and 2 sites), but while good potential opportunities, the local wildlife sites listed in Tier 3 list have not been pursued in terms of securing permission/ agreement.

A register of available and suitable sites for BNG is needed. To engage landowners and find available sites we would recommend the LPA carry out a call for nature sites. The South Downs National Park Authority is a good example. <https://www.southdowns.gov.uk/nature-recovery-information-for-delivery-partners/call-for-nature-sites/>

Land between and around designated sites would be another priority for most gain and connectivity. Potential peatland restoration sites would also be a high

priority as offsetting sites, and carbon capture. A register would also need to measure the biodiversity units potentially provided by sites.

### **Open Space Assessment and Standards Paper (LP)**

Open space provision is assessed against Fields In Trust guidance (2015), which recommends that everyone should live within 720m of a natural or semi-natural greenspace and that there are a minimum of 1.8 hectares of natural or semi-natural greenspace per 1,000 population.

The report finds that South Staffs has 5.08 hectares of accessible natural and semi-natural greenspace per 1,000 population.

A map has been produced (Fig 5.1) highlighting the areas which meet the recommended 720m accessibility guideline. The map appears to show that a significant proportion of the urban population are not within the 720m threshold for access to natural and semi-natural greenspace. However, in the Open Space Standards Paper, these shortfalls are not acknowledged. In the Accessibility Summary tables, the report states that there are largely no gaps in provision, which does not seem to tally up with the evidence in the map.

Each natural and semi-natural greenspace has been audited and rated using a 'quality' and 'value' measurement. Quality has been assessed on Green Flag criteria, which may not be relevant to assessing natural greenspaces. The information on how value is assessed is quite broad - for example, 'ecological benefits' is listed as one of the factors for assessing value. However, there is little information on how ecological benefits are measured/quantified. It is not clear how Green corridors have been identified.

There is no mention of the NRN mapping being used in the site audits for natural and semi natural greenspaces.

In conclusion, we feel that the current open space evidence base has not fully investigated access to nature, or used this information to inform policy or strategic decisions. We recommend that Natural England's Accessible Natural Greenspace Standards are more robust guidelines, and that an audit of the resource should be undertaken to highlight any deficits in provision. Actions to remedy this, such as improving access to inaccessible natural areas, naturalising existing green sites, and creating new green spaces, should be part of a nature recover or GI strategy and delivered through an updated IDP.

### **Local Green Spaces Topic Paper 2021 (LP)**

The assessment criteria could be improved for deciding on whether to designate a Local Green Space, by also considering: whether the site meets any gaps in accessible natural greenspace provision in line with Natural England guidelines; whether the site could be a potential offsetting site to provide BNG, and whether it is in a wildlife corridor.

## **Housing Site Selection Topic Paper 2021**

The paper does not provide clear information to ensure understanding of development impacts on nature and on local communities. There is no section on nature recovery or impact on natural environment under 3. 'How housing site options were assessed' - ecology has been dealt with as a site constraint, without considering strategic objectives such as the potential impact of allocation sites relative to NRN opportunities or key habitat corridors.

The Council has considered a variety of site constraints through the site survey process that may shape or prevent the delivery of employment land on a site.-

- Natural environment constraints (e.g. contains or is adjacent to designated or non-designated wildlife sites, AONB, SAC).
- Identified areas of high or very high habitat distinctiveness in the 2020 South Staffordshire District Nature Recovery Network (NRN) Mapping, which this document indicates should be a priority for protection and expansion within the local plan.

The use of the habitat distinctiveness map in the NRN report is not appropriate, as this mapping is to show patterns only and highlight areas that may need further investigation. The selection process assumes that all areas of high value have been identified, which does not consider the constraints of the data and whether data is up to date or accurate for specific sites. Some site-specific elements are considered but only 'known constraints'- no new habitat information has to our knowledge been gathered for allocation sites.

The assessment methodology needs sufficient environmental evidence on site-specific constraints to determine the scale of development possible. The following could impact on the viability of the site, or constrain the net developable area/numbers of homes deliverable, and therefore would need consideration prior to allocation:

1. Whether any parts of the site are priority or irreplaceable habitats, or meet criteria for Local Wildlife Site designation, and therefore require avoidance / retention in situ in the first instance.
2. The need to provide adequate buffers and links to existing LWS/ priority habitats adjacent.
3. The presence of protected and priority species that may need areas retained for mitigation
4. Sufficient space outside of floodplains for effective SuDs
5. Sufficient greenspace in the right location to address any deficits in the area.
6. Availability and cost of land on or off-site to achieve at least 10% biodiversity net gain.

Proposed allocation sites where biodiversity issues are not fully clear require a more detailed targeted 'Stage 2' assessment to ensure all constraints are

recognised.

#### Brownfield Land Register

This lists brownfield sites in the district and their status in terms of development, but we cannot find any evidence as to their environmental value. Many previously developed sites have high wildlife value. The NPPF advises that relevant evidence that needs to be taken into account in identifying and mapping local ecological networks includes 'information on the biodiversity and geodiversity value of previously developed land and the opportunities for incorporating this in developments'. We recommend therefore that all brownfield sites are assessed for their environmental value.

#### Question 2:

**(a) Do you agree that the correct infrastructure to be delivered alongside proposed site allocations been identified in the IDP? Yes/No**

**(b) Is there any other infrastructure not covered in this consultation document or the IDP that the Local Plan should seek to deliver? Yes/No**

ID: 816

Type: Object

Summary:

The IDP needs to deliver a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries. It also needs to account for and facilitate the provision of 10% Biodiversity net gain

Full Text:

We do not agree that all appropriate infrastructure has been identified in the IDP. Local Wildlife Sites are not mentioned under the Green Infrastructure section of the report. Although biodiversity net gain is mentioned, there is no quantification of the amount of land needed to be provided as green space, or offsetting sites, to provide 10% net gain for the predicted allocation sites. Without information on the current value of habitats and predicted impacts, it is not possible to tell whether enough GI or habitat areas would be provided, and the cost of these.

The table of Baseline infrastructure projects does not include any of the new GI areas proposed alongside development allocations, or the Tier 1 and 2 sites

indicated in the NRN mapping report as available for biodiversity offsetting.

The IDP needs to deliver a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

ID: 818

Yes, other infrastructure is needed. Flood management proposals need to consider catchment-based approaches that spread and slow water higher in the system, rather than just costly flood mitigation schemes. There is no mention of sustainable drainage, or retro-fitting nature-based solutions to tackle flooding or the issue of combined sewer overflows

**Question 3:**

**a) Have the correct vision and strategic objectives been identified? Yes/No**

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

ID: 819

Type: Object

Full Text:

Strategic Objective 11- Protecting and enhancing the natural environment

This should also mention strengthening ecological networks and environmental capital/ ecosystem services.

A Local Nature Recovery Strategy and Green infrastructure Strategy would more clearly set out strategic aims.

Strategic Objective 12- Climate Change and sustainable development

This should also include measures to sequester carbon through nature-based solutions such as habitat restoration and increasing soil carbon.

**Question 4:**

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

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



ID: 821

Type: Object

#### Summary:

Any decision to release a site from the green belt needs to be informed by environmental constraints and opportunities in that area, including any deficit or barriers existing currently with regards to access to nature.

The plan should consider selecting key nature recovery areas, 'Wildbelts', as part of a Local Nature Recovery Strategy, and should consider how access to nature can be facilitated.

#### Full Text:

##### Policy DS1 – Green Belt

Greenbelt, as a primarily landscape designation, is not concerned with biodiversity, and does not necessarily align with wildlife-rich habitats; the ecology network crosses town and countryside. Impacts, and benefits, to nature can occur on green and brownfield sites, and the key is where a site sits in the ecological network. However, the green belt is important for access to nature and can play a role in linking wildlife sites.

We welcome the statement that any Green belt release would include compensatory improvements to the environmental quality and accessibility of remaining Green Belt, including improving access to the countryside and ecological and biodiversity enhancement.

However, any decision to release a site needs to be informed by environmental constraints and opportunities in that area, including any deficit or barriers existing currently with regards to access to nature. Therefore we recommend that further studies are carried out to establish an accessible natural greenspace baseline, and any site-specific GI needs for these areas.

##### Policy DS2 – Open Countryside

We support efforts to maintain the character and sensitive assets of rural areas.

While the above policies seek to protect areas largely in terms of their landscape, there are no policies for particular areas to be protected and enhanced for nature's recovery. The plan should consider selecting key nature recovery areas, 'Wildbelts', as part of a Local Nature Recovery Strategy, where specific policies are applied to prevent harm and deliver higher enhancement and particular objectives. For example, a river corridor, or a new wooded zone could be designated, to achieve outcomes over the plan period, such as wetland creation and flood management, or a % increase in tree cover.

Good access is key for those living, working and visiting the green belt and rural areas. The plans should consider how footpaths, bridleways and cycle routes, as

well as adequate parking, can be improved in rural areas to enable sustainable access and recreation.

**Question 5:**

**Do you support the policy approach in Policy DS3 – The Spatial Strategy to 2038?**

**Yes/No**

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

ID: 824

Type: Object

Full Text:

The current policy approach is infrastructure lead, focussing new development in settlements with more 'hard' infrastructure and facilities. This does not consider environmental limits, such as landscape boundaries, flooding, water scarcity, best and most versatile agricultural soils, ecological sensitivity or other factors relevant to the capacity of the environment to cope with increased development.

Thought should be given to the sustainability of smaller settlements in terms of the 'critical mass' of residents required to sustain shops and services, and the potential opportunities for carefully designed development to improve facilities in rural areas, rather than overloading already large villages and towns.

**Question 6:**

**Do you support the policy approach in and Policy DS4 – Longer Term Growth**

**Aspirations for a New Settlement? Yes/No**

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

ID: 826

Type: Object

Full Text:

This would depend where a new settlement were to be located within a nature recovery network and whether it would enhance it and contribute to biodiversity objectives. A new settlement could provide opportunities to create new habitats and achieve net gain, if located on less environmentally valuable land.

Potential sites should be checked against the NRN map to see whether they fall within critical habitat corridors, and whether this would be an issue, or opportunity, for the network. Appropriate survey of sites for ecological constraints should be carried out before decisions are made as to capacity and suitability for development.

**Question 7:**

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

**If no, please explain your reasons for this.**

**b) Do you agree that given the scale of the 4 sites detailed in policies SA1-SA4, these warrant their own policy to set the vision for the site, alongside a requirement for a detailed masterplan and design code? Yes/No**

ID: 830

Type: Object

**Summary:**

The impacts to biodiversity are not currently known. It is not clear that all important wildlife habitats have been identified for avoidance, that 10% BNG would be achievable, or that sites are appropriate in terms of protecting or enhancing key habitat corridors. It is not clear whether the green infrastructure allocations are sufficient to address any deficits in accessible natural greenspace or how they would interact with the nature recovery network.

We agree that any strategic allocation site should have its own policy. Sufficient information on ecology constraints and opportunities, is required to enable key assets to be protected.

**Full Text:**

We neither support nor object to the strategic housing allocations, as the impacts to biodiversity are not currently known. It is not clear that all important wildlife habitats have been identified for avoidance, that 10% BNG would be achievable, or that sites are appropriate in terms of protecting or enhancing key habitat corridors.

It is not clear whether the green infrastructure allocations are sufficient to address any deficits in accessible natural greenspace, in line with Natural England's standards. Or, whether these areas are in the best locations, to effectively enhance ecological networks. All sites need further assessment for ecological constraints and against the NRN map to determine how they would interact with the nature recovery network.

#### SA1- Land East of Bilbrook

SWT welcomes the aim to provide good GI and biodiversity net gain. It is hard to judge whether this would be possible within the site as there is no information on the current habitat value, or whether sufficient green areas would be retained for required enhancement. The proposed off-site GI is on land that appears to already support semi-natural habitats. While its location in an obvious habitat corridor is good, it may not provide much uplift in biodiversity value if it is already of high diversity. More land may be needed to deliver all the GI provisions required.

#### SA2 – Land at Cross Green

The sites appear to be largely low-diversity grassland. The proposed green infrastructure includes areas of what appears to be more species-rich damp grassland. The GI areas do not look large enough to provide BNG for the allocation sites; more habitat will be needed within the sites themselves and the capacity should be estimated before allocation.

#### SA3 – Land North of Linthouse Lane

This site is arable land, and the GI area proposed, as well as GI within the site, would likely be able to deliver BNG. A local wildlife site runs through the area along the disused railway line forming a habitat corridor. Farmland priority birds may require mitigation for loss of open habitat.

#### SA4 – Land North of Penkridge

Welcome proposed country park along River Penk. It is not clear how much GI would be needed to deliver BNG.

Yes, we agree that any strategic allocation site should have its own policy. This needs to be informed by sufficient information on ecology constraints and opportunities, to enable key assets to be protected, net gain to be provided and existing nature networks strengthened in line with the Nature Recovery Network map.

#### **Question 8:**

**Do you support the proposed housing allocations in Policy SA5? Yes/No  
Please reference the site reference number (e.g site 582) for the site you are  
commenting on in your response.**

ID: 835

Type: Object

## Summary:

We neither support nor object to the proposed housing allocations, as it is not currently possible to determine the impact to biodiversity, whether 10% net gain can be delivered, or whether the sites are appropriate in terms of protecting or enhancing key habitat corridors. We recommend that a further 'layer' of assessment is carried out, to identify sites that need additional more detailed targeted 'stage 2' assessment of the ecology baseline, and that this is carried out before final allocations are made.

## Full Text:

We neither support nor object to the proposed housing allocations, as it is not currently possible to determine the impact to biodiversity, whether 10% net gain can be delivered, or whether the sites are appropriate in terms of protecting or enhancing key habitat corridors.

No green infrastructure is proposed alongside these smaller sites. Some settlements, for example Wombourne, have several proposed allocations which add up to large areas of land. New GI will be necessary in many areas to achieve BNG and will either require greenspace on the sites, or offsite- this needs to be factored in to the housing capacity and viability. It is not clear whether current open spaces in these settlements are sufficient to meet Natural England's accessible natural greenspace standards, and how additional proposed allocations will affect this.

Biodiversity or environmental net gain is not mentioned in the proformas under Key infrastructure requirements.

Due to potential allocation sites having been assessed against current habitat distinctiveness mapping only, and this map having clear constraints in terms of the accuracy of data for specific sites due to it being based on available desk-based and no up-to-date ground survey of sites, some sites are of higher distinctiveness than currently recorded. Therefore, a number of sites which could have significant impacts to biodiversity have been selected. We do not have the capacity to assess every proposed allocation, but wish to highlight some examples where we feel that biodiversity needs further consideration, and where additional information is required to inform decision making. This could apply to other allocation sites. Accurate information on the value of the site for wildlife is important to ensure accurate housing numbers are proposed, and

avoid future issues with delivery or viability.

We recommend that a further 'layer' of assessment is carried out, to identify sites that need additional more detailed targeted 'stage 2' assessment of the ecology baseline, and that this is carried out before final allocations are made.

#### Codsall - 224 Land adjacent to Station Road

Much of the site, around two thirds, experiences surface water flooding, which may limit the areas available for development. SuDs will be needed. The site is within a wetland opportunity area in the NRN map. A Local Wildlife Site lies adjacent to the south, which will require a buffer. The western end of the site links this site with another Local Wildlife Site to the north- this area is also the most flood-prone and contains two watercourses. Allocation of green infrastructure is advisable on this part of the site to help link existing habitats and manage surface water, as well as help deliver net gain. The site should be subject to further assessment of environmental constraints, as it appears unlikely that the stated minimum capacity of 85 dwellings could be sustainably delivered.

#### Kinver- 274 Land South of White Hill

The site is next to a key heathland opportunity area/habitat corridor linking Kinver Edge SSSI with Highgate Common SSSI, which is narrow at this location and which the plan should seek to strengthen and enhance. Part of the allocation site is recorded as an historic Local Wildlife Site, which also extends adjacent the site to the west. The habitats were assessed as valuable in the 80's but have not been assessed to the current LWS criteria. Having recently visited the site however, remnants of heathland and acid grassland habitats are present. Parts of the site support priority habitats and are likely to qualify as a LWS, so require up-to-date survey. This area could be categorised as High Distinctiveness after further assessment. Protected species are also present and would require mitigation. An adequate buffer to LWS areas, provision for biodiversity net gain, sustainable drainage and natural green space all need consideration, and could affect the layout and capacity of the site. Further information should be gathered to inform a decision on allocation, and housing numbers.

#### Huntington- 591 Land at Oaklands Farm (north of Limepit Lane)

This site appears to be semi-natural habitat and will require further survey to determine its value. It would require a significant proportion of the site to be retained to achieve BNG, or a compensation area offsite. This would need to be factored into the delivery of the proposed 44 houses.

582 - North of Langley Road (adjoining City of Wolverhampton boundary)  
Around a third of this site appears to be potential semi-natural habitat, which was previously designated as a local wildlife site, but has not been assessed to current criteria. There are also natural waterbodies. Priority habitats could be present. The site needs more detailed assessment before allocation, as habitats may need to be avoided and overall, the site would need areas of GI or off-site habitat compensation to achieve BNG.

**Question 9:**

**A) Do you support the proposed pitch allocations in Policy SA6? Yes/No  
Please reference the site reference number (e.g SS001) for the site you are commenting on in your response.**

**B) Is there another option for meeting our gypsy and traveller needs, including any alternative site suggestions that could be considered? Yes/No  
Please provide details, including a plan for new site suggestions**

ID: 839

Type: Object

Full Text:

Please see comments for Q8- more ecology evidence is needed to check sites are appropriate.

**Question 10:**

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

ID: 840

Type: Object

Full Text:

The Secretary of State has granted development consent for the West Midlands Interchange, and the area includes green infrastructure. The project, however, has not been assessed in terms of biodiversity net gain, which will be mandatory for all sites including major infrastructure projects. We would recommend that before allocation, it should be determined whether the proposals would provide a 10% net gain, and whether any additional provisions may be required alongside the allocation to achieve this.

**Question 11:**

**Do you agree with the proposed policy approaches set out in Chapter 6? Yes/No  
If no, then please provide details setting out what changes are needed, referencing the  
Policy Reference number (e.g HC1 - Housing Mix).**

ID: 844

Type: Object

**Summary:**

We welcome the policies on protecting and enhancing the natural environment, including biodiversity net gain and following the mitigation hierarchy . However, further steps are needed to ensure the plan complies with the Environment Bill and plans positively for nature's recovery. Further content on biodiversity net gain, ecological networks and climate change mitigation/ adaption is suggested.

**Full Text:**

We welcome the policies on protecting and enhancing the natural environment, including biodiversity net gain and following the mitigation hierarchy . However, further steps are needed to ensure the plan complies with the Environment Bill and plans positively for nature's recovery.

**NB1 - Protecting, enhancing and expanding natural assets**

Not all high distinctiveness habitats have been identified and mapped across the district, as some areas have not been surveyed on the ground, or current data is of a significant age. We would recommend that any semi-natural habitats in critical locations, such as within or adjacent settlements, should be further surveyed in order that those meeting Local Wildlife Site or priority habitat criteria can be designated/ recorded and therefore protected in policy. Otherwise, protection could take the form of designating strategic areas or corridors for enhancement, (perhaps as 'Wildbelts') which have specific policy and objectives applied to them.

The Wildlife Trusts nationally are promoting the objective that 30% of land will be protected and in recovery for nature by 2030. The local plan could support this by establishing the current baseline for the district, and adopting a policy to achieve this target in South Staffordshire.

**NB2 - Biodiversity**

We welcome the proposed policy on BNG, however this needs to be updated to reflect the requirements of the updated NPPF and Environment Bill. Net gain



would need to be delivered on all sites, not just major applications. A more detailed policy would assist developers in providing the relevant information and designing biodiversity into proposals at an early stage. There is potential for the LPA to require a higher % gain in key areas, e.g. areas identified as a priority for enhancement.

Consideration may be needed towards facilitating net gain on smaller or less viable sites, and advanced habitat creation to speed up the process. A register of sites available and suitable for BNG should be set up to facilitate developers accessing the required offsets. This should 'consider whether provisions for biodiversity net gain will be resilient to future pressures from further development or climate change'. The deliverability of net gain also needs to be considered as part of site allocations, to ensure the scale of development and green infrastructure is realistic.

### **Climate Change and sustainable development**

We support the current policies, but feel that more should be added.

The Climate Change Adaptation & Mitigation report published by Staffordshire County Council in 2020 makes a number of recommendations, that the local plan should consider adopting. One of which is that 'Local Authorities may also wish to consider establishing a Carbon Offset Fund that developers can contribute to in lieu of on-site CO<sub>2</sub> savings. This fund would be used to deliver carbon offsetting and reduction projects such as large-scale LZC installations and / or installations on existing built infrastructure (e.g. solar car parks), afforestation, and peatland restoration'. We would support proactive measures within the local plan seeking to deliver and fund such projects.

There are a number of areas where peat deposits are present in the district- these present opportunities to restore active peatlands, and thereby sequester carbon as well as provide biodiversity gains. The sites should be surveyed and protected, and be prioritised for restoration, possibly through biodiversity offsetting or carbon credits.

Increasing soil carbon should also be a key aim for carbon sequestration and soil conservation. Innovative projects such as biochar production and anaerobic digestion of vegetation could diversify farm businesses and contribute to soil health. The creation of carbon-storing habitats such as woodland, heathland, wetlands and grasslands especially on acidic soils would also have carbon benefits.

Using nature-based solutions to tackle issues such as flooding, air pollution and the need for urban cooling should be facilitated by policies in the plan.

Ensuring new buildings are orientated to maximise solar power generation and

requiring solar panels on new developments should be considered. Provision of electric car charging points should be delivered through all new developments.

**Question 12:**

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

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

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

ID: 845

Type: Object

Full Text:

We feel that NB1 and 2 should be strategic policies. The NPPF advocates that plans should have 'a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.