

# Post-adoption SA statement for the Wyre Forest District Local Plan

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# 1. INTRODUCTION

The Wyre Forest Local Plan went through a six year development process, starting with initial studies and options appraisals, two pre-submission drafts, an Examination in Public in early 2021, and subsequent modifications. The Planning Inspectorate approved the plan in mid March 2022, and the plan was adopted by the Full Council on 26 April 2022. This is summarised in Table 1.1.

**Table 1.1 Plan stages and reports**

Local Plan stage	SA/SEA stage	Consultation dates	SA/SEA reports
Initial studies, and development of issues and options	SA Scoping Report	18 May – 22 June 2015	<a href="http://www.wyreforestdc.gov.uk/media/1233990/Final-Scoping-Report-May-2015.pdf">www.wyreforestdc.gov.uk/media/1233990/Final-Scoping-Report-May-2015.pdf</a>
Issues and Options	SA Revised Scoping Report	1 September – 16 October 2015	<a href="http://www.wyreforestdc.gov.uk/media/1468164/Revised-SA-Scoping-Report-for-web.pdf">www.wyreforestdc.gov.uk/media/1468164/Revised-SA-Scoping-Report-for-web.pdf</a>
Preferred Options	SA Preferred Options Report	15 June – 14 August 2017	<a href="http://www.wyreforestdc.gov.uk/media/3012059/PO-Complete-SA.pdf">www.wyreforestdc.gov.uk/media/3012059/PO-Complete-SA.pdf</a>
Pre-Submission publication Draft Local Plan	SA Report	1 November – 17 December 2018	<a href="http://www.wyreforestdc.gov.uk/media/3992022/SA-report-Oct-2018-final.pdf">www.wyreforestdc.gov.uk/media/3992022/SA-report-Oct-2018-final.pdf</a>
Pre-Submission publication Draft Local Plan (re-opened)	SA Report	2 September – 14 October 2019	<a href="http://archive.wyreforestdc.gov.uk/media/4656968/Sustainability-Appraisal-Report-July-2019-.pdf">http://archive.wyreforestdc.gov.uk/media/4656968/Sustainability-Appraisal-Report-July-2019-.pdf</a>
Examination in Public		11 January – 6 February 2021	

As part of the development of the Local Plan, its effects were assessed through a sustainability appraisal (SA)<sup>1</sup>. SA identifies the social, environmental and economic impacts of a strategy and suggests ways to avoid or minimise negative impacts and maximise positive impacts. It is required by the Planning and Compulsory Purchase Act 2004, and also incorporates the strategic environmental assessment (SEA) requirements of the European 'Strategic Environmental Assessment' Directive, transposed into UK legislation through the Environmental Assessment of Plans and Programmes Regulations 2004.

SA/SEA has five main stages, as shown in Table 1.2. This report fulfils the first requirement of Stage E, preparation of a post-adoption 'SA statement'. Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations 2004 requires that, as soon as reasonably practicable after the adoption of a plan for which an SA/SEA has been carried out, the planning authority must make a copy of the plan publicly available alongside an 'SA statement' that discusses:

- a. how sustainability/environmental considerations have been integrated into the plan – this is discussed at Section 2;
- b. how the SA/environmental report has been taken into account – discussed at Section 3;

<sup>1</sup> No Habitats Regulations Assessment was required for the Local Plan, so that is not discussed here.

- c. how consultation opinions on the SA/environmental report of the public, consultation bodies and where appropriate other European Member States have been taken into account – this is discussed at Section 4;
- d. the reasons for choosing the plan as adopted, in the light of the other reasonable alternatives dealt with – discussed at Section 5; and
- e. the measures that are to be taken to monitor the significant sustainability/environmental effects of the implementation of the plan or programme – discussed at Section 6.

**Table 1.2 The sustainability appraisal (SA) process**

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

Task A1: Identify other relevant policies, plans and programmes and sustainability objectives

Task A2: Collect baseline information

Task A3: Identify sustainability issues and problems

Task A4: Develop the SA Framework

Task A5: Consult the consultation bodies on the scope of the SA report

*Stage B: Developing and refining alternatives and assessing effects*

Task B1: Test the Local Plan objectives against the SA framework

Task B2: Develop the Local Plan options including reasonable alternatives

Task B3: Evaluate the likely effects of the Local Plan and alternatives

Task B4: Consider ways of mitigating adverse effects and maximising beneficial effects

Task B5: Propose measures to monitor significant effects of implementing the Local Plan

*Stage C: Prepare the SA report*

*Stage D: Seek representations on the SA report from*

*Consultation bodies and the public*

*Stage E: Post adoption reporting and monitoring*

Task E1: Prepare and publish post-adoption statement

Task E2: Monitor significant effects of implementing the Local Plan

Task E3: Respond to adverse effects

Current state of Wyre Forest District Local Plan SA/SEA

## 2. HOW ENVIRONMENTAL/SUSTAINABILITY CONSIDERATIONS HAVE BEEN INTEGRATED INTO THE WYRE FOREST LOCAL PLAN

The Wyre Forest Local Plan sets out long-term objectives for how the Wyre Forest District area will develop in the period up to 2036: these are shown at Table 2.1. Table 2.2 summarises the policies in the plan. Both the plan objectives and the policies have changed slightly since the Examination in Public. Many of the plan policies incorporate environmental and sustainability considerations. They include:

- For *health*: Policy SP.16 on health and wellbeing which supports active lifestyles, green spaces and good quality housing; Policies DM.7 on open space, DM.8 on provision of open space etc., which together aim to protect the district’s green spaces; and Policy DM.28 on regenerating the waterways, which will provide new publicly-accessible areas for leisure use.

**Table 2.1 Wyre Forest Local Plan objectives**

- a. An economic role** – contributing to building a strong, responsive and competitive Wyre Forest economy by:
- Ensuring that sufficient land of the right type is available in the right locations and at the right time to support economic and social growth and innovation.
  - Identifying and co-ordinating development requirements, including the provision of infrastructure.
  - Promoting accessibility to everyday facilities for all, especially those without a car or those seeking to achieve a modal shift away from the car.
  - Implementing the Worcestershire LEP Strategic Economic Plan.
  - Implementing the Greater Birmingham and Solihull Strategic Economic Plan.
- b. A social role** – supporting strong, vibrant and healthy communities in Wyre Forest District by:
- Ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations.
  - Fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being.
  - Creating a strong sense of place by strengthening the distinctive and cultural qualities of towns and villages
  - Creating safe and accessible environments where crime, disorder and the fear of crime do not undermine quality of life or community cohesion
- c. An environmental role** - protecting and enhancing Wyre Forest District’s unique natural, built and historic environment by:
- Making effective use of land.
  - Improving biodiversity.
  - Using natural resources prudently.
  - Minimising waste and pollution.
  - Safeguarding and enhancing landscape character.
  - Protecting significant historic buildings, monuments, sites of archaeological significance and the integrity of local planning designations.
  - Protecting and enhancing green infrastructure.
  - Mitigating and adapting to climate change and flood risk, including moving to a low carbon economy and reducing flood risk and wastewater through water management.

**Table 2.2 Structure of the Wyre Forest District Local Plan**

Part	Policy
A. Strategic policies	5. A sustainable future – Development strategy 6. Strategic Green Belt Review 7. A desirable place to live 8. Health and wellbeing 9. A good place to do business 10. A unique place 11. Strategic infrastructure 12. Transport and accessibility 13. Green infrastructure 14. Water management 15. Pollution, minerals and waste 16. Telecommunications and renewable energy

B. Development management policies	18. A desirable place to live 19. Providing accommodation for Gypsies, Travellers and Travelling Show-people 20. Community facilities 21. Employment land 22. Town centre development and retail 23. Sustainable tourism 24. Safeguarding the Green Belt 25. Safeguarding the historic environment 26. Quality design and local distinctiveness 27. Rural Development
C. Site allocations	29. Strategic allocation Lea Castle Village 30. Strategic allocation Kidderminster Eastern Extension 31. Strategic allocations Blakedown 32. Kidderminster Town 33. Stourport-on-Severn 34. Bewdley 35. Previously developed sites in the Green Belt 36. Rural Wyre Forest

- For *transport and air*: Policy SP.27 on transport and accessibility which aims to minimise the need to travel and promote walking, cycling and public transport; and Policy SP.28 on green infrastructure, which promote walking, cycling and public transport
- For *soil and land*: Policy SP.24 on protecting and enhancing geodiversity which aims to protect geological sites and geodiversity generally
- For *water*: Policy SP.29 on water conservation and efficiency, which aims to reduce per capita water use; Policies SP.30 on sewerage systems and water quality and SP.32 on sustainable drainage systems which aim to prevent and reduce water pollution; and Policy SP.31 on flood risk management which aim to prevent and reduce flooding
- For *heritage*: Policy SP.21 on the historic environment, which aims to protect heritage assets and their settings, and make creative and sympathetic reuse of historic buildings
- For *landscape*: Policy SP.22 on landscape character which aims to protect and enhance the unique character of the district’s landscape and establish a Severn Valley Regional Heritage Park; and Policy SP.20 on quality design and distinctiveness
- For *biodiversity*: Policy SP.23 on protecting and enhancing biodiversity which aims to deliver measurable net gains in biodiversity; and Policy SP.28 on green infrastructure, which aims to provide a range of new green infrastructure as part of new developments
- For the *Green Belt*: Policy DM.22 on safeguarding the Green Belt which prevents development in the Green Belt except under strict conditions.

An SA framework was used to appraise the effects of the plan vision, objectives, policies, Strategic allocations and main modifications. The framework covers all of the environmental topics listed in the SEA Directive, namely biodiversity, population, human health, fauna, flora, soil, water, air climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. This is shown in Table 2.3.

**Table 2.3 Policy SA Framework: Objectives and decision-making criteria.**

SA objective	Decision Making Criteria: will the option/policy...
1) To improve health and well-being within the District and reduce inequalities in health.	Improve access to health care facilities?
	Help to improve quality of life for residents?
	Help to increase participation in sport and active recreation?
2. To improve and enhance the provision and accessibility to local services and facilities	Enhance the provision of local services and facilities?
	Contribute to rural service provision across the District?
	Enhance accessibility to the District's countryside?
3. To ensure that the housing needs of all residents and communities are met	Provide opportunities to increase the supply of affordable housing across the District?
	Provide affordable access to a range of housing tenures and sizes?
4. To promote energy efficiency & energy generated from renewable and low carbon sources.	Reduce greenhouse gas emissions?
	Encourage renewable energy generation?
	Encourage waste recycling?
5. To reduce the need to travel and move towards more sustainable travel modes; to reduce associated effects of air quality & greenhouse gas emissions	Provide opportunities to increase sustainable modes of travel and reduce congestion?
	Focus development in existing centres and make use of existing infrastructure to reduce the need to travel?
6. To protect soil & land	Re-use brownfield land?
	Result in a loss of Grade 1 or 2 agricultural land?
	Have a detrimental impact on air quality?
	Have a detrimental impact on water quality?
7. To protect water resources and quality; reduce flood risk.	Protect the floodplain from development?
	Reduce the risk of flooding in existing developed areas?
8. To protect and enhance landscape and townscape	Achieve high quality, sustainable design for buildings, spaces and the public realm which is sensitive to the locality?
9.To conserve & enhance the District's biodiversity and geodiversity	Help to safeguard the District's biodiversity and geodiversity?
	Impact on SSSIs and other designated sites?
	Contribute to the District's green infrastructure network?
10. To support the economy & ensure suitable employment opportunities	Reduce unemployment?
	Provide opportunities for businesses to develop and enhance their competitiveness?
	Provide opportunities to further develop adult and community learning facilities in the District?
11. To protect & enhance the historic environment & its settings	Have a positive impact on the District's Heritage Assets?
12. To maintain the integrity of the Green Belt within the District.	Protect the Green Belt?
13.To maintain & enhance community & settlement identities	Maintain and enhance community and settlement identities?

--	Major negative compared to the current situation - Problematic sustainability issues, mitigation difficult and/or expensive.
-	Minor negative compared to the current situation - Potential sustainability issues, mitigation possible
+	Minor positive compared to the current situation - No sustainability constraints.
++	Major positive compared to the current situation - Development would resolve an existing sustainability problem.
?	Uncertain - Uncertain or unknown effect.
0	Neutral - Neutral effect.
+/-	Both positive and negative

A similar framework was used to appraise the sustainability of individual development sites. This is shown in Table 2.4. To avoid duplication and ensure that the SA was best integrated into the planning team's analysis of the sites, the SA information was integrated into the Housing and Economic Land Availability Assessment (HELAA) forms for the sites.

**Table 2.4 Site SA Framework**

	--	-	0	+	++	?
<b>2. Local services and facilities</b>		Poor access, as judged by the HELAA form	Reasonable access, as judged by the HELAA form	Good access, as judged by the HELAA form		
<b>3. Housing needs</b>				Housing site <40ha	Housing site >40ha	Mixed use site, or not stated
<b>5. Need to travel</b>		Poor public transport access as judged by the HELAA form; within 200m of AQMA	Reasonable public transport access, as judged by the HELAA form	Good public transport access, as judged by the HELAA form		
<b>6. Soil and land</b>		Greenfield; grade 2 agricultural land; development could affect other soil/land	Part greenfield, part brownfield	Brownfield		? possible contamination
<b>7. Water and flooding</b>	Mostly/all in flood zone 2 or 3; flagged up as significant concern by water cycle study	Partly in flood zone 2 or significant surface water flooding; in aquifer protection zone or similar	Not in flood or protection zones			Flagged up as possible concern by water cycle study; inconsistency between planner knowledge and water cycle study
<b>8. Landscape</b>	Significant negative effect on many people	Some negative effect	Little/no effect	Would improve the streetscape		
<b>9. Biodiversity</b>	Adjacent to or on designated nature conservation site; other significant cumulative impact on biodiversity	Within 500m of SSSI or similar effect; affects BAP species; affects significant tree preservation order	No significant impact	Potential for improvement		

	--	-	0	+	++	?
<b>10. Economy</b>			No potential	Proposed employment development		Unclear whether employment or other uses
<b>11. Historic env</b>	Impact on Grade I, II, II*; judged by heritage officer to have significant impacts on heritage incl. archaeology	Impact on undesignated heritage assets; judged by heritage officer to have impacts on heritage incl. archaeology	No impact			
<b>12. Green Belt</b>		In Green Belt	Not in Green Belt			
<b>13. Community &amp; settlement identities</b>		Outside built area; affects asset of community value	Adjoins built area	In built area		

### 3. HOW THE SUSTAINABILITY APPRAISAL REPORT HAS BEEN TAKEN INTO ACCOUNT

The plan vision, objectives, options, policies, site allocations and main modifications were all appraised using the frameworks of Tables 2.2 and 2.3, and were revised to take the appraisal findings into account.

Vision and objectives: The appraisal made no recommendations regarding the plan vision. However, the appraisal of the plan objectives showed that SA objectives 4 (energy), 7 (water), 8 (landscape), 9 (biodiversity) and 11 (heritage) were not adequately covered by the plan objectives. Plan objective 7 also did not mention walking, cycling or bus transport. As a result of these findings, the plan objectives were amended to include greater reference to environmental issues. Plan objectives 1-6 remained the same, but new plan policies were added on green infrastructure/ biodiversity, the historic environment and landscape, health, sustainable transport and water/flooding.

Options: The appraisal of plan options is discussed at Section 5.

Policies: Section 2 lists the plan policies that already aim to minimise negative environmental and sustainability impacts of the plan. In addition, the SA process suggested changes to make the policies more sustainable. Table 3.1 lists the key changes prompted by the SA, besides minor clarifications of wording.



**Table 3.1 Changes resulting from the SA of plan policies**

<b>LDP Policy</b>	<b>Change resulting from recommendations made in the SA</b>
SP.17 A diverse local economy	Policy rephrased to include access by public transport for rural locations
SP.23 Protecting and enhancing biodiversity	Wording related to the Habitats Regulations Assessment changed to be more consistent with the regulations
SP.25 Regenerating the waterways	Changes to wording to make the policy clearer and include the River Severn.
SP.30 Sewerage systems and water quality	Final paragraph on water quality added
SP.34 Minerals	Reuse and recycling put first, to reflect the waste hierarchy. Reference added to amenity, air pollution including dust, water levels and quality, the landscape, the road network
SP.35 Waste	Requirement added about facilities being well-designed
SP.37 Renewable and low carbon energy	Statement added to make the policy also applicable to 'where possible redevelopment of existing buildings'
20C. Public footpaths (former)	Policy removed as covered by other legislation
DM.15 Local shops	Note added about providing parking where possible
DM.16 Specialist retailing	Criterion added about parking to Worcestershire County standards
DM.19 Supporting major tourist attractions	Biodiversity and heritage added as criteria for the SVR
DM.20 Supporting tourist attractions	Reference to Green Belt policies and the landscape included
DM.25 Design of extensions and alterations	Information added about the 45 degree code. Note that extensions should not <i>cumulatively</i> overwhelm the original building.
DM.26 Landscaping and boundary treatment	Greater emphasis to the retention of existing vegetation and features; mention that landscaping should encourage walking and cycling, and provide direct routes to relevant services; link to SUDS
DM.32 Agricultural land quality	Specification of what is meant by 'higher quality agricultural land', i.e. 1, 2 and 3a.

Site allocations: Changes resulting from the SA of sites include:

- Revision of some HELAA forms in response to queries raised by the SA, e.g. whether land was greenfield or brownfield, ease of access to sites
- Removal of several sites (e.g. WFR/WC/21, WFR/CC/7) because of their sustainability impacts.
- Clearer explanation for the inclusion of some seemingly unsustainable sites

Main modifications: The only changes to the main modifications suggested by the SA was clarification about the fact that Burlish Country Park is already being implemented, rather than land for the park simply being safeguarded. The policy was changed to clarify this.

## 4. HOW THE OPINION OF STATUTORY BODIES AND THE PUBLIC HAVE BEEN TAKEN INTO ACCOUNT

Successive rounds of SA report were prepared and made available to statutory consultees and the public as the Local Plan evolved. Table 1.1 summarises the consultation rounds and the availability of SA documents. All the documents were put on Wyre Forest City Council's website. CDs of the SA reports were mailed to the statutory consultees at each stage, although at scoping report stage the consultation letter included a website link. Overall, few responses to these reports were received. The responses, and changes made to the SA and Local Plan in response, are discussed below.

A SA scoping report went out to public consultation in May/June 2015 and received 46 consultation responses, including from Historic England, Environment Agency, Natural England, Worcestershire Wildlife Trust, Severn Trent and North Worcestershire Water Management. The comments included additional suggested policies to review as part of the policy context; additional baseline data to include; and changes to the SA objectives. The subsequent SA reports included changes made as a result of the comments, in particular a greater focus on protection and enhancement of biodiversity; more information on SSSI condition; improved data on water quality and flooding including water cycle studies; a focus on enhancing as well as preserving heritage assets; more information on Gypsy and traveller sites; and consideration of archaeological impacts in the site assessments. Other suggestions were incorporated into the plan itself, e.g. a strong emphasis on green corridors/ infrastructure and sustainable drainage systems (SuDS).

The Issues and Options consultation took place in Autumn 2016: this considered the issues that Wyre Forest District faced, and suggested seven options to deal with these issues. A revised SA scoping report was also made available for comment. In total, 1631 comments were received on the Issues and Options from 122 consultees. Only eight of the comments related to the SA report. Most of the responses were about the scoring of individual sites against the SA framework. More generally, the comments noted that the SA and the emerging Local Plan needed to better cover biodiversity and ecological constraints, taking into account habitats and species of principal importance; the preferred alternatives did not protect the Green Belt and would result in the loss of grade 2 and 3 agricultural land; and the SA process should justify policy choices and why some policies had progressed and others been rejected. In response, further information about biodiversity and ecological constraints were included in the SA site appraisals.

Further consultation took place at the Preferred Options stage for eight weeks in Summer 2017. Most of the consultation comments received in response to the SA of the Preferred Options related to the scoring of sites against the SA framework. Issues included:

- Scoring of sites should be less negative as many uncertainties exist so should be scored 0,? or more positively. The scoring should reflect the potential benefits of development.
- Scoring of sites should be more negative. The SA was perceived as being extremely optimistic, as it is unlikely that site development would have a significant positive effect on the district's biodiversity.
- Concern with some sites assessed in SA.
- Concern about the removal of fields, suggesting that mitigation will not meet the needs of existing users of walkways and bridleways.
- Some proposed sites have problems that were not fully addressed in the SA. A site in SA could not have mitigation to lessen impact.

In response to these comments, the sites were assessed afresh, using GIS and other location-specific information where available. The detailed appraisal results were set out in each site's HELAA form

An SA report accompanied the Pre-Submission Publication draft of the Local Plan, and was consulted on alongside the draft plan in late 2018 and again in late 2019. No substantive comments were made on the SA report.

As part of the Examination in Public, several developers raised issues regarding the SA. One developer queried why the SA had not assessed all of the Lea Castle cumulatively: a cumulative impact assessment of the Lea Castle sites was subsequently carried out and submitted to the inspector. Another developer queried the consistency of scoring between documents: the SA team explained the scoring, and that some scores were revised as more information became available. One developer queried why development sites that did not look particularly sustainable were taken forward: they were referred to Section 5.6 of the SA report which explained why this was done. The same developer queried the red/amber/green categorisation used for the site appraisal: they were referred to Table 3.9 of the SA report.

## **5. THE REASONS FOR CHOOSING THE PLAN AS ADOPTED, IN THE LIGHT OF OTHER REASONABLE ALTERNATIVES DEALT WITH**

Different alternatives (or options) were considered at different stages of the Local Plan development process, and were assessed and compared as part of the SA process. Chapter 5 of the SA report discusses alternatives in detail. This section summarises the main findings.

Amount of housing: The amount of housing needed was based on the national standard method, using the 2016 based Household National Population Projections and an extended plan period. This gives a minimum of 276 dwellings/year or at least 5,520 over the plan period. The Council did not use the 2014 based household projections, as this would have given a lower housing figure of 248 dwellings/year. This is because the Council wishes to be ambitious with its housing requirement figure in order to support economic growth and affordable housing delivery. The Council also identified an additional 15% of sites in case some of the allocated sites do not come forward.

Broad areas of development: At the Issues and Options Stage of September 2015, seven options for accommodating growth within the district were considered, all of which prioritise development on brownfield land but reflect different ways of providing the necessary additional greenfield development:

1. Brownfield regeneration focused on the main towns of Kidderminster and Stourport-on-Severn.
2. Brownfield regeneration focused on the main towns, and expansion of Kidderminster to the North East via a sustainable urban extension.
3. Brownfield regeneration focussed on the main towns, and expansion of Kidderminster to the South East via a sustainable urban extension.
4. Brownfield regeneration focus for Stourport-on-Severn with some greenfield and Green Belt release
5. Allocate some development to Bewdley through an amendment to the town's settlement boundary to accommodate new development
6. Allocate more new development to the villages and settlements within the District's rural east.
7. Allocate more development to the villages and settlements within the District's rural west

Following consultation on the Issues and Options stage, it was considered that a combination of options would be needed to accommodate the housing and economic growth needed in the district, with infrastructure requirements, especially schools and highways, being critical to the final strategy:

- Option 1 would not deliver the necessary amount of development land. The preferred option is to take forward the option of using brownfield land but to combine this with other options to ensure that enough land will be available.
- Option 2 and 3 are the most sustainable greenfield locations within Wyre Forest District and these options were taken forward.
- Option 4 was taken forward because of the need to regenerate Stourport-on-Severn.
- Option 5 was taken forward to ensure that local need in Bewdley is met.
- Option 6 was taken forward only in part. Generally Options 2 and 3 were found to address the local need from the rural east with fewer negative impacts than Option 6.
- Option 7 was taken forward in the form of a small amount of development to serve local need and to retain local services such as schools and shops.

At the Preferred Options stage of May 2017, the six preferred options from the Issues and Options stage were combined into two more specific options for location of growth in the district. Each included a common set of sites that were considered to be relatively unconstrained and in appropriate locations. Option A additionally included a few larger sites in the Green Belt to the east of Kidderminster: Lea Castle, and sites to the east and south-east of Kidderminster. Option B additionally included more dispersed growth across the District over a larger number of smaller sites. However, having assessed and compared Options A and B, the Council subsequently decided to move forward with a different combination of sites.

In total, 151 development sites were appraised using the SA framework of Table 2.4. In terms of choosing the preferred sites, a site selection paper brought together the key findings from evidence-based studies and considered whether sites should be considered for allocation in the emerging Local Plan. Consideration was given to the Green Belt Review Stages 1 and 2, and any cumulative effects / common circumstances which could affect whether or not a site, or group of sites, should be taken forward for consideration for allocation. Policy implications of allocation were also considered. Site selection was also informed by discussions with developers, Worcestershire County Council, statutory consultees, Worcestershire Wildlife Trust, Members of the Council's Local Plan Review Panel, and others.

As the Objectively Assessed Housing Need number fell from 300 to at least 276 per year, so less housing became needed. The updated Employment Land Review Study (2018) also reduced the district's employment land need from 40ha to 29ha. This led to the council dropping its support for development on land to the rear of Spennells in favour of more housing at the Lea Castle site. This was because of ecological issues, including the existence of protected corn buntings (birds) on the site; lack of support for an eastern relief road; consultation comments; and the possibility of creating a sustainable urban village at Lea Castle, including a school and possibly a GP surgery and employment land.

Some sites were rejected based on specialised studies. For instance the water cycle study showed that many brownfield sites have problems with flooding, both fluvial and from surface water runoff. Many of the town centre sites have viability issues. For this reason, many of the existing allocations were not taken forward into the emerging Local Plan.

Sites that did not come out well in the sustainability appraisal but that were nevertheless taken forward are:

- OC/13. This is a large 89ha site with a southern area that abuts the ecologically sensitive Hoobrook, is prone to flooding, and host protected animal species; and a less sensitive

northern area. Although the SA appraisal showed the impacts of developing the whole site, the plan only proposed to develop the northern parcel of 57ha, avoiding the more sensitive southern part of the site. The northern part would also be expected to provide ecological gain through improved Green Infrastructure.

- WFR/WC/32. This 18ha site was, together with WFR/WC/15, WFR/WC/33 and WFR/WC/34, brought forward as Lea Castle Village. On its own, WFR/WC/32 did not score well in terms of sustainability. However when considered together with the other sites, it helps to provide the critical mass needed to provide a new school and other facilities.
- MI/21. This site was removed from the Green Belt and put within the Stourport settlement boundary in 1989, and cannot be moved back into the Green Belt. It was being put forward because the Local Plan must promote non-Green Belt sites before Green Belt sites, but only as a reserved housing site.

Proportion of affordable housing: To provide for the full quota of affordable housing need, the Local Plan would need to provide 158 affordable homes per year, or 57% of the objectively assessed housing need. This is not viable: it would not be possible for developers to provide this and make a profit, essentially preventing most housing from being developed in the district. A viability assessment and discussions with viability consultants confirmed that 25% affordable housing on sites of 10 or more homes, or on sites of 0.5ha or more would be viable. This was included in the plan.

Density of development: Another key decision in the plan related to development density. One approach would be to maximise housing density on Green Belt land, and leave the rest as Green Belt (i.e. agricultural). Instead, the plan calls for the two large new urban extensions – at Lea Castle Village and Kidderminster Eastern Extension – to provide for at least 40% Green Infrastructure, so increasing the size of Green Belt land taken. At Lea Castle, the Green Infrastructure will consist primarily of the existing woodland. The remaining land is expected to be developed as a mixture of high and low density housing, schools, community facilities, and in the case of Lea Castle also employment. This approach, with more green infrastructure and less agricultural land, was preferred as it is expected to provide biodiversity enhancement; improve the health of both residents and non-residents in line with Policy 9 on health and wellbeing; and encourage walking and cycling.

## **6. MEASURES TO MONITOR THE SIGNIFICANT SUSTAINABILITY EFFECTS OF THE IMPLEMENTATION OF THE LOCAL PLAN**

The Environmental Assessment of Plans and Programmes Regulations 2004 require local authorities to “monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action.” The aim of SA monitoring is to set a framework that indicates whether the plan is making progress towards sustainable development.

Government guidance advises that existing monitoring arrangements should be used where possible in order to avoid duplication. Local authorities, including Wyre Forest District Council, already produce Authority Monitoring Reports (AMR).

A detailed framework for has been prepared to monitor the implementation of Wyre Forest’s Local Plan: the results of this monitoring are expected to be published in the Authority Monitoring

Reports. This framework covers most of the significant environmental, social and economic effects of implementing the strategy. Table 6.1 shows

1. monitoring indicators that measure likely effects of the Local Plan identified in the SA,
2. who would monitor the indicators and how frequently, and
3. targets (positive) that the Local Plan will try to achieve.

Where monitoring of the indicators suggests that significant unexpected impacts are occurring, remedial action will be taken when preparing the next cycle of Local Plan.

**Table 6.1 SA monitoring framework for the Wyre Forest District Local Plan**

SA objective	Indicator	Who monitors, how frequently	Target
1. Health	• Index of Multiple Deprivation ranking	Dept. for Levelling Up, Housing and Communities; approx. every 10 years	Improvement / decrease (currently 107 out of 317 English local authorities)
	• Health dimension of the Index of Multiple Deprivation ranking		Improvement / decrease (currently 140 out of 317 English local authorities)
	• Difference in life expectancy of men and women in most v. least deprived 20% areas		No difference (currently 9.4 years difference for men, 8.5 years for women)
2. Services	• Provision of local facilities at strategic sites	Planning Dept., annually	As required by the Local Plan
3. Housing	• Housing approvals and net completions		276 dwellings/year, 5520 dwellings by 2036 (Local Plan)
	• Amount and percentage of affordable housing		≥25% affordable (Local Plan)
4. Energy	• Local authority CO2 emissions	Dept. for Business, Energy & Industrial Strategy, annually	Net zero by 2050 (Climate Change Act 2008)
	• Installed capacity of renewable energy (in MW), by type		Increase (currently 7969MW)
5. Transport, air	• Vehicle-km on main roads	Worcestershire County Council, annually	Decrease
	• Mode of travel to work		Increase in non-car transport
	• Air Quality Management Areas	Worcestershire Regul. Services, annually	0
6. Soil, land; 8. Landscape	• Area of greenfield development	Planning Dept., annually	No more than 202ha by 2036 (Local Plan)
7. Water	• Proportion of river length assessed as fairly good or very good for chemical quality and biological quality	Environment Agency	100% at good ecological status by 2027 at the latest (Water Environment (Water Framework Directive) (England and Wales) Regulations 2017)

SA objective	Indicator	Who monitors, how frequently	Target
	<ul style="list-style-type: none"> <li>Per capita water consumption</li> </ul>	Only collected nationally?	125 litres/person/day for new homes (Building Regulations G2)
9. Biodiversity	<ul style="list-style-type: none"> <li>Condition of SSSIs</li> </ul>	Natural England, sporadic	Good
10. Economy	<ul style="list-style-type: none"> <li>Proportion of working-age residents in employment</li> </ul>	NOMIS, annually	
	<ul style="list-style-type: none"> <li>Amount of employment land available</li> </ul>	Planning Dept., annually	29ha (Local Plan)
11. Heritage	<ul style="list-style-type: none"> <li>Number of heritage assets at risk (HAR)</li> </ul>	Historic England	0
12. Green Belt	<ul style="list-style-type: none"> <li>Removal of land from the Green Belt</li> </ul>	Planning Dept., annually	No more than 246ha
13. Communities	<ul style="list-style-type: none"> <li>Total population, and population by broad age groups</li> </ul>	Census / NOMIS, annually	n/a