



South Staffordshire Council

Consultation Statement

Publication Plan 2022

April 2024



Further information can be found at
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South Staffordshire Council

South Staffordshire Local Plan

Local Plan Review

Regulation 19 Consultation Statement

November/December 2022

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1.0 Introduction

- 1.1 All planning authorities have a strategic plan which provides a framework for the future planning of their area and contains policies for the determination of planning applications. South Staffordshire's current Local Plan is made up of two main documents, the Core Strategy and the Site Allocations Document (SAD). The Core Strategy was formally adopted in December 2012 and the SAD in September 2018.
- 1.2 We have now begun a review of the Core Strategy/SAD and aim to prepare a single Local Plan which will replace these two documents. The new plan will run from 2023 until 2041 and we began the process in 2018 by collecting evidence and undertaking a number of public consultations as part of the review process. The most recent consultation was a pre-submission Regulation 19 consultation held in late 2022.
- 1.3 This statement describes the public consultation undertaken by the council in relation to the Local Plan review Regulation 19 process. The statement outlines the consultation methods used by the council, the local communities and organisations that were consulted and summarises the views of respondents to the key issues raised throughout the consultation. It also highlights some of the key messages that have emerged from the consultation that have informed the preparation of the council's pre-submission plan.
- 1.4 The Regulation 19 consultation was carried out to meet the requirements set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. The regulations set out the legal requirements that Local Planning Authorities (LPAs) must comply with in relation to early engagement. This is set out in **Regulation 18 – Preparation of a Local Plan** and requires the council in readiness for submission under Regulation 19 to:
- Notify specific consultation bodies as well as general consultation bodies, residents and other persons that the LPA considers appropriate of the Local Plan that the LPA proposes to prepare.
 - Invite all those invited to make representations to the LPA to comment on what the Local Plan should contain.
 - Take into account any representations received when preparing the Draft Local Plan.
- 1.5 The council has an adopted [Statement of Community Involvement](#), or SCI, which sets out how we aim to engage with local communities and stakeholders in plan preparation as well as when determining planning applications. The SCI contains a list of the types of organisations, individuals and statutory bodies that are consulted in preparing a plan. The Regulation 19 consultation was carried out in accordance with the adopted SCI.

2. Consultation

- 2.1 The council is committed to involving local communities and stakeholders in the preparation of the Local Plan and sees consultation as an ongoing activity, which feeds the views of residents and consultees into the plan process.
- 2.2 We have an online consultation system which contains a database of people or organisations that have expressed an interest in the Local Plan or have made comments to previous Local Plan consultations. Some of the organisations are statutory consultees such as adjoining local authorities, Natural England, highways etc and others include community groups, parish councils and residents. A full list of the types of individual and bodies we consult can be found in the SCI.

Consultation System

- 2.3 Our bespoke online consultation system allows people to register themselves, manage their own responses and view those of other people or organisations, once moderated and published. Individual representors or organisations can monitor their own responses to each of the stages of the review of the Plan going forward. The Regulation 19 document was uploaded to the system where it could be viewed, and comments made direct online. The document was also published as a pdf on to the council website and copies were made available at deposit locations at parish councils, libraries in South Staffordshire and the Council Offices in Codsall.
- 2.4 All individuals on the database were notified of the consultation by email or letter.
- 2.5 Respondents could also send their representations in by email or letter if they did not want to use the online system. All duly made responses, however received, were uploaded onto the system which allows for reports to be generated and responses anonymised and summarised for publication.

Consultation Approach

- 2.6 Changes in online and digital approaches to consultation, partly in response initially to Covid restrictions, but also to move towards the Government's digitalisation of planning agenda, meant we continued with a hybrid approach to consultation. This approach was established in our Preferred Options consultation, was very well received and led to the council receiving a Certificate of Excellence in the prestigious iESE Public Transformation Awards 2022.
- 2.7 The more traditional methods of meetings in village halls, posters, deposit copies at parish councils and libraries, and putting information in our Review magazine, were supplemented by Locality based online Question and Answer sessions and in person appointments, plus increased use of social media, Gov Delivery and council weekly news round up emails sent to parish councils and residents.

Duty to Co-operate

- 2.8 The Localism Act 2011 brought in the Duty to Cooperate which requires planning authorities and other public bodies to actively engage and consider joint approaches to plan making where appropriate. The council engages on an ongoing basis with service providers and neighbouring authorities and the information received has informed the Local Plan review process. It is also used to keep the Infrastructure Delivery Plan up to date.

Local Plan review – Previous consultations

- [Issues and Options](#) - Monday, October 8 until Friday, November 30, 2018
- [Spatial Housing Strategy and Infrastructure Delivery](#) - Thursday, October 17 until Thursday, December 12, 2019
- [Preferred Options](#) - Monday, November 1 to Monday, December 11, 2021

Local Plan review – Publication Plan (Regulation 19) 2022

- 2.9 The purpose of the Local Plan review Publication Plan consultation was to set out the council's final proposed plan ready for submission to the Secretary of State, to be examined by an independent Planning Inspector. The Publication Plan was supported by a comprehensive evidence base which had been updated since work began in 2018. [Local Plan Review Evidence Base \(sstaffs.gov.uk\)](http://sstaffs.gov.uk)
- 2.10 Regulation 19 consultation differs from earlier consultations because it is about the legal soundness of the plan. It relates to whether the council has prepared the plan positively. Whether it is justified and effective. Does it comply with national planning policy and the tests of soundness in the National Planning Policy Framework (NPPF). The responses from this consultation will be sent to the Inspector, together with any minor changes the council wishes to make as a result of the consultation as part of the Examination process.
- 2.11 In the 2022 public consultation, the council proposed to plan for a housing target of 9,089 dwellings between 2018 and 2039. This was made up of just over 4,000 dwellings to meet our own housing needs over the plan period (plus completions to date), whilst also making a proportionate and justified contribution to the unmet needs of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) of approximately 4,000 dwellings. It also considered the principle and set out policy direction for a search for a new settlement which would be explored in the preparation of the next plan.
- 2.12 The SAD committed us to carrying out an early review of the Local Plan (Policy SAD1) to respond to the increasing need for development, both within South Staffordshire, and in our neighbouring authorities. Agreeing to an early review of the Local Plan was an essential requirement of the government's Planning Inspector who examined our SAD and was largely in response to unmet housing needs in both South Staffordshire and the wider Housing Market Area (HMA).

- 2.13 Formal consultation on the Publication Plan for the Local Plan review to meet statutory regulations, was carried out for 6 weeks from Friday, November 11 until midday Friday 23 December 2022. However, the Publication Plan was available for information on the council's website in advance of Full Council which was held on November 8, 2022.
- 2.14 The Publication Plan consultation sought views on the **soundness** of the plan in line with the requirements of the NPPF at paragraph 39 (in 2022) where it should be:
- a) **Positively prepared** - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.
 - b) **Justified** - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.
 - c) **Effective** - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.
 - d) **Consistent with national policy** - enabling the delivery of sustainable development in accordance with the policies in the Framework and other statements of national planning policy, where relevant.
- 2.15 We also asked for views on whether the Publication Plan was **legally compliant** and adhered to the requirements of the **Duty to Cooperate**.
- 2.16 We published a number of supporting and consultation documents which included:
- [Duty to Cooperate Paper 2022](#)
 - [Infrastructure Delivery Plan 2022](#)
 - [Sustainability Appraisal 2022](#)
 - [Habitats Regulations Assessment 2022](#)
 - [Green Belt Review 2019](#)
 - [Landscape Study 2019](#)
 - [Viability Study 2022](#)
 - [Housing Site Selection Topic Paper 2022](#)
 - [Strategic Housing Market Assessment Update 2022](#)

The full list of evidence base documents is published on the council's website and updated as and when new studies and information is available. [Local Plan Review Evidence Base \(sstaffs.gov.uk\)](#)

Publicity and Procedures

2.17 We wrote to everyone on our Local Plan Register, by email or letter, to advise them the consultation was starting and where the documents were available to view. The documents were made available online on the council's website prior to the official start of the consultation on 11 November 2022 at [Publication Plan \(sstaffs.gov.uk\)](https://www.sstaffs.gov.uk). There was a banner on the main page of the council website which linked directly to the Publication Plan consultation page, and a link direct to the document via the consultation system.

2.18 Hard copies were also provided at:

- Council Offices, Community Hub, Wolverhampton Road, Codsall
- All 27 South Staffordshire Parish Councils
- Local libraries in South Staffordshire

Media - Newspapers and South Staffordshire Review

2.19 A public notice was placed in the Express and Star and Chronicle newspapers covering the district on Friday 11 November 2022.

2.20 Articles are published in each edition of the council's Review newspaper to keep residents up to date about progress with the Local Plan review. Editions 79-80 are relevant to the Publication Plan

Media – Social Media and Mailshots

2.21 A Facebook campaign was begun prior to the consultation and throughout the consultation period to explain why we were reviewing the Local Plan, to signpost to FAQs, to enable people to sign up to the new consultation system and to disseminate information about the online Q&A sessions and in person events.

2.22 We used frequent social media posts to provide information, respond to questions, provide links for online meetings and in person appointments, and to alert people to the consultation dates and deadlines for responses. We were made aware that the consultation also featured and was discussed and shared on local Facebook groups such as Perton Residents' Page, Essington Live, Wombourne Online, Penkridge Matters, Bilbrook Codsall and Surrounding Areas and Kinver Past and Present and by various action groups. Parish councils also shared the information widely on their own Facebook pages and websites.

2.23 The council uses GovDelivery which is a web-based e-mail subscription management system that allows members of the public/organisation to subscribe to news and information. This takes the form of a weekly news roundup which is sent to subscribers and was shared on social media.

- 2.24 FAQs were provided and regularly updated throughout the consultation using feedback from the public events and online Q&A sessions.

Digital and In Person Meetings

- 2.25 Following on from the success of our in person events and online Q&A sessions established for the Preferred Options consultation, we tailored the events on a locality basis, but anyone from any area within or outside South Staffordshire could attend and pose questions.

- 2.26 We held separate in person appointment days for members of the public at five locations:

- Locality 1 Penkridge, Haling Dene Centre - Monday 14 November 2022
- Locality 2 Coven Memorial Hall – Wednesday 16 November 2022
- Locality 3 Essington Community Centre – Thursday 24 November 2022
- Locality 4 Codsall Community Hub – Monday 28 November 2022
- Locality 5 Wombourne Civic Centre – Wednesday 7 December 2022

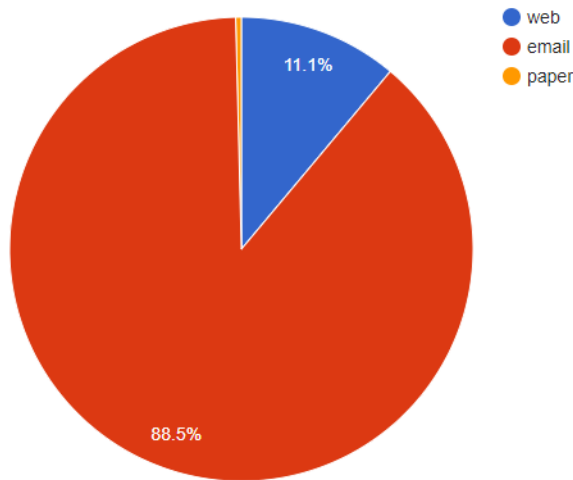
These took place between 10.30am – 7.30pm with senior planning officers, with up to six people attending each slot. This helped focus discussions on the concerns of the attendees, and a far more personalised approach. Although they were Locality based locations, anyone could attend from any part of, or from outside of, the district.

- 2.27 Microsoft Teams virtual online Q&A sessions were programmed into the public engagement schedule. Links were made available to the sessions via Facebook, council website, parish councils, and direct mailshots, with no need to register so that as many people as possible had the opportunity to join in, from any location. There were 5 two-hour, evening online sessions undertaken during the consultation period, plus a bespoke session for parish councils. They took the form of an initial presentation by officers about the Publication Plan, followed by an open forum, where people could pose questions in the chat box to senior planning officers.
- 2.28 Council officers were also available at the Council Offices in Codsall to discuss the Publication Plan documents during normal working hours (8.45am – 5pm, Monday - Friday) in person by appointment, or Microsoft Teams meetings could be arranged, or via telephone call for the whole 6-week consultation period. Copies of the documents relating to publicity and procedures can be seen in Appendix 1.

Making Representations

- 2.29 In line with the government's digitalisation of planning agenda, we encouraged people to make representations electronically using the consultation system, where there was an opportunity to make comments directly onto the Publication Plan document specific to the requirements of Regulation 19. People could also email localplans@sstaffs.gov.uk or send by post to the Council Offices. We provided a

guidance note and response form based on the template issued by PINS. A significant number of responses (88.5%) were received via email.



Together with the online consultation system, over 99% of responses were received electronically.

3. Responses to the Consultations

3.1 There were 265 unique respondents, and detailed analysis of the comments led to 1530 representations. Responses can be broken down into 3 different general response types plus petitions:

- Responses from statutory bodies and stakeholders, such as Natural England, Environment Agency, Parish Councils etc
- Responses from agents representing sites and/or landowners
- Responses from general public and others
- Petitions

3.2 In the Publication Plan document people could comment against any paragraph, so there were extensive opportunities to comment. The majority of residents gave their own views, particularly on site allocations, or used standard wording provided by actions groups as the basis for their comments. Most respondents did not make comments on soundness or legal compliance and the main issues raised by residents related to specific sites. Many respondents also signed petitions and action group forms in addition to any responses they had made as individuals.

3.3 The top five areas for comment were:

Topic	Total Respondents	Support	Object	Comment
SA5 Housing Allocations	150	18	148	65
DS5 Spatial Strategy to 2039	68	11	59	20

DS4 Development Needs	52	12	63	4
SA3 Land North of Linthouse Lane	37	1	27	13
SA1 Land East of Bilbrook	35	1	23	14

- 3.4 Each response was read, and comments were assigned by respondent against each element of the Plan. It is possible that a resident may have sent us an email, followed by a duplicate letter, and completed pro-forma produced by a local action group. Therefore, a single respondent may have multiple objections and or supporting comments against their name.
- 3.5 Where people used the consultation system direct, they were able to choose to respond to the soundness and legal compliance questions. Where the representations were uploaded from emails and letters, the assessment of support or object was not definitive, but rather more indicative of an overall sentiment from the full representation.
- 3.6 Planning Agents and developers varied in how they submitted responses, some sending an email per client, others sending one email covering a number of clients. In the same way, the comments have been recorded by agent, against each client separately before objections/supporting comments were attributed to each question.
- 3.7 It is important to note that it is not the volume of responses which is given weight, but the substance of the representations as they relate to material local planning considerations. For example, Site A with 500 objections will not be discounted against Site B with 50 objections just because Site A received a higher number of objections. This is because the level of responses made does not mean the planning issues raised in the comments have more significance. Equally, if one person has raised an issue, say on the impact of development on, or loss of Green Belt, that is taken no less seriously than if 500 people make the same point. It is not 500 times more serious, because more people have objected on that issue.
- 3.8 The table below shows how many individual or organisations made responses.

Unique Respondents

Publication Plans Consultation	Duly Made	Late/Invalid Responses
Number of Respondents	265	22

- 3.9 The table below shows the overall number of comments made by the 265 respondents.

Summary of Comments

Publication Plan Consultation Representations	Support	Objections	Comment	Total
Representations	127	931	472	1530
	8%	61%	31%	100%

- 3.10 Section 4 gives a general breakdown of key issues raised. The council has taken into account the issues raised in the full response from each contributor before responses were redacted and summarised for publication online here: [South Staffordshire - Login \(oc2.uk\)](#)

4. Key Messages

4.1 Chapter 1 Introduction - Key Issues Raised

- Consultation approach considered inadequate and not inclusive
- Plan does not take account of recent government intentions to change NPPF
- Plan period is incorrect and should be extended
- Whole development strategy should be reconsidered
- Evidence base should be expanded
- Housing numbers are based on out of date evidence and are therefore contribution of 4000 towards unmet need is too high (residents)/too low (development industry) and should be revisited and Strategic Growth Study should be updated.
- Special circumstances for release of Green Belt not met; brownfield sites available in West Midlands

4.2 Chapter 2 Setting The Scene – Key Issues Raised

- Green Belt sites should be removed from the plan
- Villages are full, infrastructure is insufficient

4.3 Chapter 3 What the Plan needs to consider – Key Issues Raised

- Housing and employment requirements are an opportunity for the local economy
- Lack of masterplanning for Langley Road site
- Not all sites are located in sustainable locations
- Role of neighbourhood plans should be included
- Development is contrary to strategic objectives for quality of life
- Mismatch of existing housing stock and future housing need
- Insufficient evidence to support 4000 contribution to wider housing shortfall
- Support for the consideration of historic environment as a key issue

- EDNA under forecasts employment requirements
- Support for and against the use of the GBBCHMA Strategic Growth Study as a source of evidence
- SA based on significant underestimation of employment need
- Site specific alterations required to Green Belt and Landscape Studies

4.4 Chapter 4 Vision and Objectives – Key Issues Raised

- Support for and objections to Strategic Objectives
- Vision not locally relevant
- Housing led urban extensions will be heavily isolated from facilities and services
- Housing need miscalculated, housing need should be based on current population projections
- Housing and employment overspill needs from Black county not being accommodated

4.5 Chapter 5 General Issues – Key Issues Raised

- Objection to the inclusion of Green Belt sites
- Site specific objections and support
- Support for and objections to Spatial Housing Strategy
- Sites to meet the 4000 contribution to the wider housing need should be specifically identified
- No consideration of increasing council's local housing need based on economic growth aspirations and increasing age demographic
- Insufficient consideration of brownfield sites
- Black country authorities have now disbanded their joint plan
- Duty to Cooperate is being deleted, should not comply with it
- Plan process is difficult for the lay person to understand

4.6 Policy specific comments – Green Belt, Spatial Strategy, New Settlements, Development Needs– Key Issues Raised

- Wide variation of both support and objection from the development industry and residents. Summaries of responses can be seen here: [South Staffordshire - Consultations \(oc2.uk\)](https://www.south-staffordshire.gov.uk/consultations/oc2.uk)

4.7 Strategic Masterplanning Locations – Key Issues Raised

- General support from development industry and landowners for the 4 strategic master planned allocations
- Main objections by residents were to the two sites at Linthouse Lane, Wednesfield on the border with Wolverhampton City Council, and Land East of Bilbrook (see para 3.3)

- Objections based on insufficient infrastructure/locations, proposed changes to national planning policy, insufficient facilities and services, impact on the road network, health and education services.
- Summaries of responses can be seen here: [South Staffordshire - Consultations \(oc2.uk\)](https://www.south-staffordshire.gov.uk/consultations)

4.8 Other Housing allocations – Key Issues Raised

- General support from development industry and landowners for site allocations with a number of omission sites being put forward in addition to allocations proposed
- Main objections by residents based on insufficient infrastructure/locations, proposed changes to national planning policy, insufficient facilities and services, impact on the road network, health and education services.
- Failure to identify safeguarded land for future development
- Objections to the principle of development on Green Belt land
- Summaries of responses can be seen here: [South Staffordshire - Consultations \(oc2.uk\)](https://www.south-staffordshire.gov.uk/consultations)

4.9 Housing Policies – Key Issues Raised

- Policies for housing mix are overly prescriptive, particularly the requirement for 70% of homes to be 3 bed or less
- Insufficient flexibility to meet local demand in different areas
- Green Belt sites should be built out at lower densities; requirements should be a target; should be applied on a site by site basis
- HMA and other evidence will quickly become out of date
- Support for the efficient use of land
- Affordable housing policy broadly supported but should be more flexible for specialist accommodation and exempt from Starter and first Homes
- Blanket 30% requirement could affect viability
- Specific requirement for bungalows not appropriate requirement for older persons housing; meeting optional M4(2) a better approach; justification needed
- Further allocations required for specialist accommodation
- Rural Exceptions sites policy supported in principle, but needs greater flexibility
- Self and custom build should be via windfall development and not required on smaller sites

4.10 Gypsies and Travellers – Key Issues Raised

- Support for policy H9
- Preference for maximum 15 pitches per site

4.11 Design and Standards – Key Issues Raised

- Support for new design approach in line with government guidance
- New dwellings should be built with solar panels/air or ground heat source pumps and EV charging points
- Design should only be considered at full application stage
- Local character should be given more weight
- Provision of tree lined streets should be subject to highway authority agreement
- Internal space standards is not justified and should be removed; evidence does not support optional NDSS
- Garden areas may not be realistic when judged against net densities of 35 dws per hectare
- Support for the provision of EV charging point, but these should come through Building Regulations and not local planning policies

4.12 Successful and sustainable communities – Key Issues Raised

- Health infrastructure can be accommodated by on site provision, rather than through S106
- No clear indication of how health infrastructure has been considered in the Plan
- Policy not justified as drafted and should make reference to specific CIL tests 122 for planning obligations
- Engagement with County Education should inform further refinement of the IDP
- No consideration of the increased population and requirement for school places
- Blanket assumption made that all developments will require education infrastructure requirements
- Support for specific planning policy for South Staffordshire college
- Both support in principle for the open space requirement and objections that it provides insufficient flexibility on a site-by-site basis and is far too prescriptive
- Policy should be amended to allow for off-site open space provision where accessible facilities are already available; formula used should be available for scrutiny
- Public rights of way and cycles routes should be maintained
- Reference to equestrian requirements is omitted and this should be rectified
- Policy approach to providing a network of interconnected multi-functional and accessible blue and green spaces is supported

4.13 A Strong Local Economy – Key Issues Raised

- WMI should be identified by a designation which refers specifically to the DCO and requirement of a rail/road link

- HGV parking should be addressed
- B8 use should be supported at locations close to the road network
- The policies as proposed to not address the shortfall of employment land in South Staffordshire and the wider needs of the Black Country
- Support for the creation of more skilled jobs and the retention of young educated students
- Objection to requirement for Employment and Skills Plan as drafted
- Rural employment policies are restrictive
- Policies for equine and horse related facilities is supported

4.14 Community services, facilities and infrastructure – Key Issues Raised

- Car parks in villages should contain parking for larger vehicles
- Reference to retail provision being provided on strategic sites as part of a central hub
- Security should be a priority when designing community facilities
- Support from developers for infrastructure led strategy
- Residents' objections to lack of existing infrastructure for health, education and highways, lack of public transport
- IDP must be kept up to date
- Active travel should include equestrian

4.15 Protecting and enhancing the natural environment – Key Issues Raised

- Greater requirement for tree protection required
- Green Infrastructure evidence is too vague
- Additional areas of open space and green infrastructure should be provided
- Biodiversity policy is not effective or positively prepared, should be more flexible for off site provision
- Government policy and guidance does not yet provide for 10% biodiversity net gain; the policy is too restrictive; should be in line with legislation
- Reference to the protection and enhancement of trees and hedgerows inconsistent with NPPF

4.16 Climate Change and sustainable development – Key Issues Raised

- Policy for solar should encompass battery storage
- Impact of renewable energy technologies on the historic environment should be considered
- Lack of evidence of how net zero will impact on viability; a more flexible approach should be taken
- Standards should be met through Building Regulations and not through local plan policies; policy requirements are higher than Future Homes Standards

4.17 Enhancing the Historic Environment – Key Issues Raised

- Conservation Management Plans for canals should be provided; existing CA Management Plans should be updated
- Policy should read preserve with conserve
- General support for policies supporting Hatherton Branch Canal

5. **Summary**

- 5.1 The council undertook wide ranging public consultation with stakeholders, landowners, developers, statutory bodies and local communities in line with the requirements set out in the Town and Country Planning (Local Planning) (England) Regulations 2012, our adopted Statement of Community Involvement (SCI) and under the Duty to Cooperate.
- 5.2 The Publication Plan consultation ran for 6 weeks from Friday, November 11 to Friday, December 23, 2022. The document was in the public domain prior to the consultation starting.
- 5.3 The consultation was widely publicised through a variety of means including the council's website, social media, direct mailshot, posters, the council's Review newspaper, and parish councils. Officers were available throughout the consultations to answer queries and discuss the proposals in person, by telephone and through email. In person appointments and virtual online Q&A sessions were held over the 6 week consultation period.
- 5.4 The full, detailed responses to the consultation have been read and recorded and the information in them has been used to inform the next stage of consultation. Summaries of all the responses are available on the council's consultation system:
- 5.5 Although the Publication Plan 2022 has been superseded by the 2024 Publication Plan, the council will ensure that the representations to this consultation are made available to the Inspector. The responses to this consultation have informed the more recent 2024 version. [South Staffordshire - Consultations \(oc2.uk\)](https://www.south-staffordshire.gov.uk/consultations)

TOWN AND COUNTRY PLANNING (LOCAL) (ENGLAND) REGULATIONS 2012

SOUTH STAFFORDSHIRE COUNCIL

LOCAL PLAN REVIEW

- **PUBLICATION (PRE SUBMISSION) PLAN**

The Council has published a Publication Plan document for public consultation, together with supporting documents.

There is a 6 week period during which you can make comments on the documents, and they are available to view on our website at www.sstaffs.gov.uk/localplanreview.

The documents, response forms and a frequently asked questions sheet are also available at the following locations:

- South Staffordshire Community Hub, Wolverhampton Road, Codsall WV8 1PX on Mondays – Fridays 8.45am to 5.00pm.
- Parish Council offices in the district during their normal opening hours.
- Libraries in South Staffordshire

If you would like to make any comments, you must do so in writing online at <https://sstaffs.oc2.uk/login> or by email direct to localplans@sstaffs.gov.uk or to the address above.

Consultation Period: Friday 11 November until 12 noon Friday 23 December 2022.

For further information please contact the Local Plans Team on 01902 696423 or see our website at www.sstaffs.gov.uk/localplanreview.



«Organisation»
«Title» «Initial» «Surname»
«Address1»
«Address2»
«Address3»
«PostalTown»
«Postcode»

Please ask for: Strategic Planning Team
Direct Dial: (01902) 696423
Email: localplans@sstaffs.gov.uk

Date: 11 November 2022

Dear Sir/Madam

SOUTH STAFFORDSHIRE LOCAL PLAN REVIEW **REGULATION 19 PUBLICATION PLAN CONSULTATION**

We are writing to you because you have made comments previously or asked to be kept updated about the Local Plan, and we are now beginning the final stage of public consultation before the plan is submitted to the Secretary of State.

The Publication Plan contains the final sites for housing and employment, pitches for Gypsies and Travellers, and new and updated policies which will be used to decide planning applications when it is adopted. Sites have been chosen taking on board responses to consultations over the past 4 years and drawing on a great deal of information and evidence from planning specialists, stakeholders, statutory bodies, agents, residents, and community groups.

Some sites have changed since the Preferred Options and these changes are as a result of new evidence and taking on board the comments we received from residents, statutory authorities and other organisations. This means we have chosen the sites based on robust planning evidence and to meet current national planning policy and our legal Duty to Cooperate with neighbouring authorities.

This stage of consultation is different to previous stages because it is about the legal soundness of the plan. Has the council prepared the plan positively? Is it justified and effective? Does it comply with national planning policy? Any comments you make should relate to these issues and they will be sent to the independent Planning Inspector who will be appointed to conduct a formal Examination into the plan, which will include public hearing sessions.

Our consultation runs for 6 weeks from **Friday 11 November until 12 noon Friday 23 December 2022**. To help you we have produced a [FAQ Sheet](#) and a [Guidance Note](#) to help explain the process for this consultation.

Comments must be made in writing and the simplest way to do this is by using our [consultation system](#). You can make comments on a specific policy or area of the plan, and

they will be uploaded straight into the system. If you have made comments previously, you can log in as we will already hold your details.

The Publication plan and supporting evidence are available to view online at www.sstaffs.gov.uk/localplanreview and there will be hard copies of the plan at the Community Hub in Codsall, your local parish council office and libraries in South Staffordshire.

All comments made will be submitted with the Plan to the Secretary of State who will appoint an independent Planning Inspector to hold a Public Examination into the Local Plan review. Dates for the Examination will be set by the Planning Inspectorate (PINS). The Inspector will decide whether or not the plan can be adopted or if any changes need to be made. If you make comments to this consultation, you will be notified of the Examination timetable.

If you wish to speak to someone from the Local Plans Team about the consultation, there are many ways you can do this. We have some in-person public consultation events planned (by appointment only), online Q&A sessions, virtual appointments or you can telephone on 01902 696423 to speak to us direct. See the information below about how to take part in the events.

We hope you will take the time to be involved and respond to our consultation, but if you have any queries, please contact a member of the Strategic Planning Team.

Yours faithfully

Strategic Planning Team

Sessions are planned for each [Locality](#), however you can attend any session, whether you live in South Staffordshire or elsewhere.

Online Q&A Sessions: 6pm – 8pm

To join a meeting please use link below

[Locality 5](#) – Wednesday, 23 November 2022

[Locality 4](#) – Wednesday, 30 November 2022

[Locality 3](#) – Thursday, 1 December 2022

[Locality 2](#) – Tuesday, 6 December 2022

[Locality 1](#) – Wednesday, 14 December 2022

In Person Locality Sessions: 10.30am – 7.00pm

by appointment only call 01902 696423 to make an appointment

Penkridge, Haling Dene Centre - Monday 14 November 2022

Coven Memorial Hall – Wednesday 16 November 2022

Essington Community Centre – Thursday 24 November 2022

Codsall Community Hub – Monday 28 November 2022

Wombourne Civic Centre – Wednesday 7 December 2022

Virtual Appointments (Microsoft Teams): by arrangement call 01902 696423

Telephone: 01902 696423 between 9am and 5pm Monday – Friday

Comments can also be sent to localplans@sstaffs.gov.uk or by post to South Staffordshire Council, Community Hub, Wolverhampton Road, Codsall, South Staffordshire WV8 1PX.



Local Plan Review Publication Plan Frequently Asked Questions

The Publication Plan (also known as a pre-submission plan) is published for consultation under Regulation 19 which is about the legal soundness of the plan.

This is the time in the plan process that residents, statutory bodies and other organisations, have the chance to put their views forward to the independent Inspector who will be appointed by the government to examine the plan. People will also have the opportunity to ask to be heard at the public examination sessions.

There will be full examination of the evidence, and how the council has developed the plan in the context of national planning policy, and whether the proposed sites and policies can be justified.

The examination is a democratic process, taking into account the views of all participants which will be heard by an independent planning professional. After the examination process, and subject to the plan being found sound, the final decision whether to adopt the plan rests with the Council.

We contacted DLUHC on 3 November 2022 to ask for advice on whether or not to delay the plan making process and received a firm response to say we should continue to Regulation 19 consultation and there should be no pause in plan making.

What is a Local Plan?

Every local planning authority must produce a Local Plan which sets out the planning framework for their area. It contains the amount of housing and employment growth being planned for in the next few years and where that growth will be located. It also contains policies which will be used to decide planning applications. The Local Plan is just that, local to the area it covers, so the policies in our Local Plan will be tailored to South Staffordshire.

Why are we reviewing our current Local Plan?

All councils must review their Local Plans at least every five years to take on board updated information. The government has made it very clear that plans should be put in place without delay and having a new, up to date adopted plan will put us in a very strong position to resist developer led, unplanned development in locations outside of our control, or planning by appeal and we believe this is in the best interests of our residents.



What stage is the Review at?

We carried out an Issues and Options consultation in 2018, a Spatial Housing Strategy consultation in 2019 and Preferred Options in 2021. This next stage is **Publication, or pre-submission**, which is the plan we want to be adopted, based on the planning evidence we have collected.

What is a Regulation 19 Consultation, why is it different to previous consultations?

The process for preparing and adopting a local plan is set out in law under planning regulations. Regulation 19 is different because it is about the legal soundness of the plan. Has the council prepared the plan positively? Is it justified and effective? Does it comply with national planning policy? Any comments you make should relate to these issues and they will be sent to the independent Planning Inspector who will be appointed to conduct a formal Examination into the plan, which will include public hearing sessions. We have prepared a guidance note to explain more.

What is the Council's approach?

We have used land already earmarked for development in our current plan, with new growth in villages with the most facilities and services and where there are infrastructure opportunities. With additional development through urban extensions along the border with the Black Country and Stafford, we propose to provide new homes across the district, both for South Staffordshire and for our neighbouring authorities, under our legal Duty to Cooperate (see below). This approach will lead to Green Belt release, and this is something that has been very carefully considered in arriving at the final draft plan. We have worked hard to bring forward brownfield options first, but there is very little available brownfield land in South Staffordshire. We know there are very difficult decisions to be made in providing new homes and protecting the Green Belt as much as we can, which is why less than 0.75% is being proposed to be released for housing.

Why do we have to help other Councils out?

All councils must meet a legal test known as Duty to Cooperate. This means we have to engage 'constructively, actively and on an ongoing basis' with our neighbouring authorities over matters which cut across administrative boundaries. If this duty is replaced with an alternative requirement to align with other plans, we can decide whether to withdraw or amend the plan. We do know that whatever might replace the Duty to Cooperate will still require councils to plan for development needs across boundaries, and we still need to prepare a plan which is legally sound.

The Black Country Authorities are now proposing to 'go it alone'. What does this mean for our plan?

We believe we have worked constructively with the Black Country authorities and remain in a position to submit our plan for examination. Dudley MBC's decision to withdraw from the joint Black Country plan is for their members to consider, bearing in mind the requirements of national policy and the need to prepare a sound plan that will pass examination. The four Black Country authorities will still need to move forward with their plans - they are not halting plan making indefinitely. However, delaying means they will have to revisit their housing numbers in the light of recently published evidence showing significantly higher housing shortfalls across the housing market area of now over 100,000 homes.



Housing numbers

The overall level of development is made up of our own district's local housing need, which is set by the government, and a contribution towards the wider housing market area shortfalls. We believe this additional contribution is based on robust evidence against calls from the development industry for much higher housing numbers. The Inspector will decide if our approach is sound, but if national government guidance for the calculation of housing figures changes, we can decide whether to withdraw or amend the plan.

Is 'no development' an option?

The simple answer is no. The government is clear that housing growth is fundamental to revitalising the economy and the thrust of national planning guidance (NPPF) is to 'boost significantly the supply of housing'. The need for housing is not just a national issue, but a local one too. If we don't plan to deliver this growth ourselves, we will lose significant control over where it might go. Having a local plan in place which sets out firm locations and guidelines for development puts us in a **much stronger position** to defend the district from ad hoc applications

What evidence has been used to guide development?

Preparing a Local Plan is not a simple process. The Plan is supported by a robust **Evidence Base** which has looked at sustainability, the importance of the historic and natural environment, protecting and enhancing our landscapes, access to jobs and services and many other issues, including impact on the Green Belt. Our evidence has been published at each stage of the process so that you can see how the Plan has been developed.

Responses to the Preferred Options Consultation

A total of 1690 individuals or organisations including residents, planning agents, developers and statutory bodies made comments and all responses have been read and taken into account in reaching the final plan. As a result, some sites have changed based on the issues raised and updated evidence. A breakdown of the responses can be found in the Consultation Statement.

Green Belt and Landscape Studies

We have asked consultants to look at what impact development might have on our Green Belt and the landscape of the district. The studies have helped us to see where the most sensitive areas of landscape in the district are and which areas of Green Belt would be most affected by development.

Why isn't Green Belt land protected from new development?

The Council is committed to the protection of the Green Belt, and we know there are very difficult decisions to be made when we are looking for new sites. The government is clear in national planning policy that Green Belt boundaries may need to be reviewed through the Local Plan. We will have to show the Inspector, who decides if the Plan is sound, the reasons why we have chosen to release some Green Belt land.



How much Green Belt will be released?

Sites proposed to be released from the Green Belt amount to around 1.4% of the total Green Belt in the district. Of this, just over half is due to West Midlands Interchange (WMI), a strategic rail freight interchange that was given consent at a national level by the government in 2020. This means that **less than 0.75%** of Green Belt is proposed to be released for housing.

Are Green Belt and Greenfield the same?

No, greenfield sites are those which have not previously been built on, or where previous development has blended back into the landscape. Brownfield land is previously developed land, although this excludes agricultural buildings. Green Belt is a planning, not environmental, designation and the Green Belt can include land that is both greenfield and brownfield.

Climate Change

The Local Plan contains policies to achieve (regulated) Net Zero on new housing sites and large sites will have whole life carbon assessments. There is a suite of renewable energy policies, including electric charging points on new homes, and there will be a 10% biodiversity net gain on major sites through good design principles.

Consultation

The Publication plan consultation is carried out under formal planning regulations. There is a six week public consultation period for comments to be made. Comments must be made in writing between 11 November and 12 noon on 23 December 2022. **Comments made before or after these dates cannot be considered.**

Community Engagement

There will be opportunities to discuss the plan with the Local Plans Team throughout the consultation period. We will be holding five separate Locality online Question and Answer Sessions where officers will explain the proposals and you will be able to submit questions for the team to answer. We will also be holding face-to-face sessions at the Council Offices and in the five localities, by appointment, plus online appointments via Teams and telephone.

Consultation System

Our consultation system allows you to read the plan and make your comments direct. You can manage your own account and response and see details of other responses when they are published. It's very simple, all you need is your email address to register. Go to <https://sstaffs.oc2.uk/login>

If you made comments on previous consultations and we have your email address, you will already be on the system.

Comments can also be made by emailing localplans@sstaffs.gov.uk or by letter to South Staffordshire Council, Community Hub, Wolverhampton Road, Codsall, South Staffordshire WV8 1PX



Stay Informed

We will keep our website and Facebook page updated with details of the consultation. We will write to everyone who has made comments previously, or who has registered on our database, to let them know about the consultation, where to find the documents and how to submit a response.

Next Steps

The Secretary of State will appoint an independent Planning Inspector to conduct an **Examination in Public**. The Inspector's role is to consider whether the Plan is **sound and legally compliant** (including the **Duty to Cooperate**). In doing this they will consider any representations received on the final draft and hold public hearing sessions where the main matters and issues raised in the representations can be discussed in person.

All the information on the Local Plan review to date and the supporting documents are available online at www.sstaffs.gov.uk/localplanreview



South Staffordshire Council

www.sstaffs.gov.uk

Council Offices
Codsall
South Staffordshire
WV8 1PX

Tel: **01902 696000**
or email localplans@sstaffs.gov.uk



South Staffordshire Local Plan Review

Planning positively for the future of South Staffordshire



The Plan

- Plan period now 2018 – 2039
- Avoiding a policy vacuum - existing plan policies run to 2028
- Government requirement that new plans should be in place by 2023



Climate Change and Environment

- All new homes to be (regulated) Net Zero and large sites to have whole lifecycle carbon assessments
- Suite of renewable energy policies
- All developments to result in a biodiversity gain of 10%



Homes

- The new Local Plan will deliver around 2,500 affordable homes
- 100% of homes built to higher accessibility standards
- Good mix of house types – across all age ranges, from young families to older people
- High quality design
- Less than 0.75% Green Belt to be released for housing development



People and Communities

- Village centre services and community facilities protected
- Financial contributions towards health infrastructure, where required
- Keep jobs in the district by protecting employment land



Infrastructure

- Financial contributions towards education infrastructure where schools need expansion
- New first/primary schools and additional retail offer on the four largest strategic sites
- Highways and active travel infrastructure
- Contributions towards sustainable transport, where required
- Creation of new rail based Park and Ride at Brinsford



Work and Play

- Employment and skills policy would create opportunities for local people
- Full fibre broadband in new homes where possible, to future proof home working and recreational accessibility
- All major housing sites will make contribution towards sports facilities/playing pitches
- Larger sites to provide on-site multi-functional public open space, including children's equipped play areas
- Smaller sites will make a financial contribution towards existing open space

Local Plan Review - Preferred Options and Next Steps

Members are driving the development of the new Local Plan for South Staffordshire, and consultation on preferred options is now taking place until 5pm on Monday, December 13 2021.

This is your opportunity to make comments on the plan.

The preferred options set out sites for housing and employment, and for pitches for our Gypsy and Traveller community.

Our new plan will cover the period from 2018 up to 2038 and aims to provide for the needs of our residents in South Staffordshire, and some housing for our neighbouring authorities under our legal Duty to Cooperate.

We have chosen our preferred sites based on robust planning evidence with infrastructure at its heart.

We know that there are significant challenges in meeting national requirements, and providing new homes for our local communities, whilst protecting our Green Belt wherever possible.

There are opportunities to discuss the options with members of the Local Plans Team at locality-based question and answer sessions, pre-booked face-to-face appointments and by phone and online meetings.

The Government is pressing all planning authorities to make good progress with Local Plans, in advance of possible reforms to the planning system, and we need to have ours in place by 2023.

Your views will help us to shape the future of South Staffordshire and build on our strong track record of providing affordable homes and jobs and bring about new or improved local services and facilities and public open spaces.

Comments made to the consultation need to be made in writing. They will be carefully considered by the Local Plans Team and will feed into the preparation of the next stage of consultation which will be the Publication Plan, due to be published in 2022. To view the Preferred Options go to www.sstaffs.gov.uk/localplanreview

Consultation Portal

It is now really quick and simple to register on our Local Plans consultation system - all you need is an email address. The system is easy to use and you can view and make comments on live consultations. Find it at sstaffs.oc2.uk/login

If you have previously commented on a consultation or registered your interest, you will have been added automatically. To activate your account, just put your email address in the login and if it is recognised you will need to request a new password (click *I can't remember my password*). If we don't have your email address, then follow the instructions online to get set up.

When a consultation is finished you will be able to see your comments and those of other people and organisations all in one place.

If you need any more information see www.sstaffs.gov.uk/localplans or email localplans@sstaffs.gov.uk

Now you see itnow you don't!

Our planning enforcement team was alerted to a new four-bedroom house which sprang up in the Green Belt in Trysull without permission.

The house was built in 2019 and the owners needed to submit a retrospective planning application to try and put things right, but this was resolutely refused.

The landowner appealed the council's decision, but this was soundly dismissed by the Planning Inspectorate in April this year. A Planning Enforcement Notice was then served to force the removal of the unauthorised house, resulting in the structure being demolished.



Before



After

We hope this sends out a very strong message to landowners that the council will take firm action against unauthorised development when we need to.

Keep in touch

To receive updates about the Local Plan review sign up on our new consultation portal or visit

www.sstaffs.gov.uk/localplanreview

Don't forget, if you have made comments previously on the Local Plan we will write to you automatically.



PLANNING

£1bn logistics site prepares for construction

One of Europe's largest new logistics development sites, West Midlands Interchange (WMI), is preparing to start construction (subject to detailed planning permission), with the first phase of construction for WMI beginning in late 2022.

The site also boasts a range of other sustainability credentials, including 109 acres of country park to protect and promote biodiversity, and a wide range of renewable energy features, as well as providing 8,500 new jobs for the region during its development, construction and operation.

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To support the local employment opportunities, an Employment Fund Steering Group has been established for the project. The group will direct the spend of the Employment Fund, including local employment opportunities and skills and training plans.

www.westmidlandsinterchange.co.uk/



Concept plan of the £1bn logistics site

Meeting the district's needs

We are really pleased that homes for a wide range of needs are being delivered. A total of 209 affordable homes were completed across the district and handed over to our Housing Association partners in 2021-22.

Most of the homes are on sites allocated through the Local Plan. So far, permission has been granted for 483 affordable homes, plus over 100 bungalows and more than 500 two- and three-bedroom properties for the open market. This will meet some of our housing needs for older people, as well as young families looking to set up their first home.

We work closely with partners to deliver specialist housing schemes and The Burgesses in Kinver was built on the site of several bungalows which were no longer fit for purpose.

Developed by Housing Plus Group, the scheme includes 20 one-bedroom apartments which allow residents to live independently. It also benefits from photovoltaic panels that supplement the building's electrical supply and a range of communal facilities, including an attractive rooftop terrace.



South Staffordshire Council Chief Executive Dave Heywood; Housing Plus Group Chief Executive Sarah Boden; son of the late Cllr Edwards, Chris Edwards; and South Staffordshire Council Leader Cllr Roger Lees.

Completed in late 2021 it benefitted from funding from Homes England and South Staffordshire Council (SSC).

In May, a memorial bench was unveiled in honour of late former SSC Leader, Councillor Brian Edwards MBE, at the site.

Local Plan Review



Following on from the Preferred Options public consultation in 2021, the representations made by local communities, developers and statutory bodies have all been read - and the comments have informed the next stage of plan preparation.

Key themes that were raised by residents were loss of green belt land, impact of development on existing infrastructure, facilities and services such as GP surgeries and schools, and the level of housing growth being planned for.

Our next consultation will be our Publication Plan which will set out the final sites and planning policies. If you have made comments before, we will write to you automatically to tell you when the consultation starts. If not, you can register for updates at <https://sstaffs.oc2.uk/login>

Details of Engagement with Residents – Local Plan Review 2018 to Date

Date	Medium	Method
Autumn 2018	South Staffordshire Review Issue 71	Hard copy delivered to every household in South Staffordshire; copy on Council website
8 October – 30 November 2018	Issues and Options Consultation (Regulation 18)	<ul style="list-style-type: none"> • Hard copies at Council Offices; 27 parish councils; 9 libraries in South Staffs • Council website • Direct mailshot LP Database letters and emails • Social Media incl video • Public Notice E&S • Articles in E&S • Posters at Council Offices and parish council offices • 3 Face to face drop in sessions at Codsall, Penkridge and Wombourne • Council Officers available for appointments at Council Offices or by telephone
Spring 2019	South Staffordshire Review Issue 72	Hard copy delivered to every household in South Staffordshire; copy on Council website
Summer 2019	South Staffordshire Review Issue 73	Hard copy delivered to every household in South Staffordshire; copy on Council website
17 October – 12 December 2019	Spatial Housing Strategy and Infrastructure Delivery Consultation (Regulation 18)	<ul style="list-style-type: none"> • Hard copies at Council Offices; 27 parish councils; 9 libraries in South Staffs • Council website • Direct mailshot LP Database letters and emails • GovDelivery • Social Media incl video • Public Notice E&S • Articles in E&S • Posters at Council Offices and parish council offices • Council Officers available for appointments at Council Offices or by telephone
Winter 2019/20	South Staffordshire Review Issue 74	Hard copy delivered to every household in South Staffordshire;

		copy on Council website
Spring 2020	South Staffordshire Review Issue 75	Hard copy delivered to every household in South Staffordshire; copy on Council website
March 2020	A5 Leaflet regarding Local Plan Review	Hard copy sent out to every household with annual Council Tax bills.
Autumn 2020	South Staffordshire Review Issue 76	Hard copy delivered to every household in South Staffordshire; copy on Council website
Winter/Spring 2021	South Staffordshire Review Issue 77	Hard copy delivered to every household in South Staffordshire; copy on Council website
Summer 2021	South Staffordshire Review Issue 78	Hard copy delivered to every household in South Staffordshire; copy on Council website
August/Sept 2021	Pre-preferred Options FAQs	Social media and GovDelivery
Autumn 2021	Preferred Options Consultation (Regulation 18)	<ul style="list-style-type: none"> • Hard copies at Council Offices; 27 parish councils; 9 libraries in South Staffs • Council website • Direct mailshot LP Database letters and emails • GovDelivery • Social Media incl video • Public Notice E&S • Articles in E&S • Posters at Council Offices and parish council offices • Podcast • Parish Council evening Q&A • 5 Locality online evening Q&A sessions • 5 Locality face to face appointment days 10am-7.30pm • 2 Development Industry face to face appointment days • Council Officers available for appointments at Council Offices or by telephone
Winter 2021	South Staffordshire Review Issue 79	• Hard copy delivered to every household in South Staffordshire; copy on Council website
Winter 2022	South Staffordshire Review Issue 80	• Hard copies available at council Offices and in community locations; copy on Council website

<p>Winter 2022</p>	<p>Publication Plan Consultation (Regulation 19)</p>	<ul style="list-style-type: none"> • Hard copies at Council Offices; 27 parish councils; 9 libraries in South Staffs • Council website • Direct mailshot LP Database letters and emails • GovDelivery • Social Media, council's own posts and information on local community groups and parish councils • Public Notice E&S • Articles in E&S • Posters at Council Offices and parish council offices • Parish Council evening Q&A • 5 Locality online evening Q&A sessions • 5 Locality face to face appointment days 10am-7.30pm • Council Officers available for appointments at Council Offices or by telephone
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Above all accords with the Council's adopted Statement of Community Involvement (SCI)
Council website updated at every stage of Local Plan review process.

Strategic Planning Team



South Staffordshire Council

www.sstaffs.gov.uk

Council Offices
Codsall
South Staffordshire
WV8 1PX

Tel: **01902 696000**
or email localplans@sstaffs.gov.uk

November 2022