South Staffordshire Local Plan

Site Allocations Document (SAD)

Pre-Submission Consultation Statement
Parts 1 & 2

Regulation 22 (1) (c) (i)-(v) (d)

August 2017
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Part 1

Regulation 22 (1) (c) (i)-(ii)

Publication Plan SAD Publicity and Procedures
1. 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 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 is at the heart of the Local Plan setting out the long-term vision, objectives and planning policies to deliver the vision and secure a sustainable future for the District. The SAD once adopted, will set out site specific proposals and policies for the use of land to guide future development, in order to help to deliver the vision and objectives of the Core Strategy.

1.2 The Consultation Statement relates to the Site Allocations Document (SAD) pre-submission (Publication Plan) process and is set out in 3 separate parts:

- Part 1 outlines the consultation methods used by the Council and identifies the local communities and organisations that were consulted. [Reg 22(1) (c) (i)-(ii)]

- Part 2 summarises the main issues raised through the Publication Plan consultations, and identifies the number and type of responses received. [Reg 22(1) (c) (iii)-(v) (d)]

- Part 3 is a Schedule of Representations and Responses which summarises the issues raised by respondents together with the Council’s response and includes reference to any minor modifications that have been proposed as a result of the representation. [Reg 22(1) (c) (iii)-(iv)]

1.3 The Publication Plan 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 LPAs must comply with in relation to early engagement. This is set out in Regulation 19 – Publication of a Local Plan and requires the Council to:

(a) make a copy of each of the proposed submission documents and a statement of the representations procedure available in accordance with regulation 35, and

(b) ensure that a statement of the representations procedure and a statement of the fact that the proposed submission documents are available for inspection and of the places and times at which they can be inspected, is sent to each of the general consultation bodies and each of the specific consultation bodies invited to make representations under regulation 18(1).

1.4 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. A list of the main bodies/organisations we consulted can be found in Appendix A.
1.5 This Consultation Statement is Part 1 and has been prepared to meet the requirements of Regulation 22 – Submission of documents and information to the Secretary of State (1) (c):

(i) which bodies and persons the local planning authority invited to make representations under regulation 18

(ii) how those bodies and persons were invited to make representations under regulation 18

Consultation

1.6 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.

1.7 We have a Local Plan Register which is 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 England, Environment Agency 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.

1.8 Anyone who makes representations to any Local Plan consultation is automatically added to the database. There is also an opportunity for people to register direct by sending the Local Plans Team contact details by email or letter.

Duty to Co-operate

1.9 The Localism Act 2011 brought in the Duty to Co-operate which requires planning authorities and other public bodies to actively engage and consider joint approaches to plan making where appropriate. Meetings and workshops have been held throughout the development of the SAD with infrastructure and service providers and neighbouring authorities and the information received has informed the site selection process. It has also been used to keep the Infrastructure Delivery Plan up to date. Details can be found in the updated Duty to Co-operate Schedule which was published in tandem with the Publication Plan consultation.

SAD Publication Plan (pre-submission) Consultation

1.10 Paragraph 182 of the National Planning Policy Framework (NPPF) states that the Local Plan will be examined by an Inspector to assess whether the SAD has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. Soundness of the plan is defined as whether it is:

- Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence
• Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities
• Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

1.11 The purpose of the SAD Publication Plan consultation exercise was to gain views on the soundness and legal compliance of the final SAD that was to be submitted to the Secretary of State. The policies and sites contained in the Publication Plan SAD were developed as a result of site assessment and evaluation against the methodology and taking on board information from continuous consultation with stakeholders and statutory bodies, and representations from all previous SAD consultations.

1.12 Following the Preferred Options consultations, some revisions were made at Publication stage to sites selected for allocation and safeguarding and to the supporting evidence base documents. The changes were made to reflect information received through the consultations, site re-assessment and as a result of updates to some of the evidence base documents, including the Council’s Green Belt Review and Landscape Sensitivity Study, and to correct some factual errors and/or omissions. However, all sites contained in the Publication Plan have been consulted on during the various stages of public consultation since the first Main Issues and Options consultation in early 2014.

**Publication Plan SAD – Main Consultation 16th January 2017 – 27th February 2017; Addendum Consultation 10th March 2017 – 24th April 2017.**

1.13 Consultation on the Publication Plan SAD was first carried out for 6 weeks beginning Monday 16th January 2017 and ending at midday on Monday 27th February 2017. A further round of consultation was carried out for just over 6 weeks between Friday 10th March and midday Monday 24th April 2017. This addendum consultation was necessary because a number of residents who had responded for the first time to the Preferred Options consultation were not pulled through from the database for the initial Publication Plan SAD consultation. The addendum consultation therefore gave these people the same opportunity to respond and to ensure that everyone on the database had been able to access the same information. This technical issue with the database has now been resolved.

1.14 The Publication Plan SAD contained those sites, which after evaluation and assessment were considered to be the most suitable to be taken forward for allocation at each of the villages identified for development. In addition to the proposed housing sites, land was identified for safeguarding for longer term development needs; extensions to strategic employment sites at i54 South Staffordshire and ROF Featherstone; and additional pitches for gypsies and travellers.

1.15 The final sites were selected to meet the adjusted housing numbers as set out in the Preferred Options document. These numbers had been revised through the SAD process to take account of development new to supply since the adoption of the Core Strategy and where permissions had lapsed or were under delivered. For each of the proposed allocated sites an indicative area and capacity were given; and for safeguarded land site area.

1.16 In terms of employment sites, an area of land west of i54 South Staffordshire was identified as an extension; and at ROF Featherstone two extensions one to the west and one to east have been proposed for allocation. The road options for
ROF were refined to 3 options – 7, 8 and 9 and work is ongoing to determine which of these options is the most suitable.

1.17 We published 4 main consultation documents and a number of supporting documents which were:

- Publication Plan SAD
- Publication Plan SAD Methodology Paper
- Publication Plan SAD Site Assessment and Discounted Sites Paper
- Publication Plan Site Assessment Criteria Topic Paper

**Supporting and Evidence Base Documents**

- Publication Plan Policies Maps
- Sustainability Appraisal
- Habitats Regulations Assessment
- Updated Duty to Cooperate Paper
- Preferred Options Consultation Statement
- Updated Infrastructure Delivery Plan
- Gypsy & Traveller Topic Paper
- Housing Topic Paper
- Open Space Topic Paper
- CIL Viability Study
- Updated Landscape Sensitivity Study
- Updated Green Belt Review

1.18 The purpose of the South Staffordshire SAD is to identify the detailed allocations required to deliver the Core Strategy. As a Tier 2 Plan, the Council does not consider the Site Allocations Document to be the appropriate point at which to revise the housing target established in the Core Strategy. The Preferred Options SAD therefore contained a Policy – SAD1: Local Plan Review, which aimed to offer certainty that this matter will be addressed when the Core Strategy is reviewed.

1.19 The Publication Plan SAD contained the Council’s final proposed sites for new housing development; sites to be safeguarded for longer term development needs; extensions to i54 South Staffordshire and ROF Featherstone (including road options to deliver ROF); pitch options for Gypsies and Travellers; and amendments to Green Belt/Development boundaries. In addition it included new Open Space Standards and proposed policies for the Hatherton Branch Canal and Key Development Requirements. The Bratch Policy area at Wombourne is proposed to be deleted.

**Publicity and Procedures**

1.20 We wrote to everyone on our Local Plan Register, by email or letter, to advise them about the consultation and where the documents were available to view. This included any people or organisations that had responded to the Preferred Options consultations held in 2015/16. As stated at paragraph 2.8 there were two separate consultations, but all people and/or organisations were given the opportunity to comment. Copies of the documents could also be purchased at the Council Offices or at the local drop in sessions (see below). The documents were made available online on the Council’s website at www.sstaffs.gov.uk/siteallocations and remain available for information. They were also provided in hard copy at:

- Reception, Council Offices, Wolverhampton Road, Codsall
• All 27 South Staffordshire Parish Councils
• Public Libraries at Brewood, Cheslyn Hay, Codsall, Great Wyrley, Kinver, Penkridge, Perton, Wombourne and Staffordshire County Mobile and Trailer Libraries operating in the District.
• The Council’s four Leisure Centres at Codsall, Cheslyn Hay, Penkridge and Wombourne

1.21 We provided response forms online and at each of these venues and at the drop in sessions. We encouraged people to make representations electronically by email; however many responses were still made in the form of hand written letters, or forms/comments sheets. Examples of a sample letter and the response form can be seen in Appendix B.

Media
1.22 A public notice was placed in the Express and Star and Chronicle newspapers on Monday 16\textsuperscript{th} January 2017. There were also articles in the Express & Star about the proposals. Information about the consultation was also Tweeted and appeared on the Council’s Facebook page over the consultation period. A half page article with an update on next steps for the SAD was published in the Council’s Review newspaper Edition 64 Summer 2016. There was a further article in the Autumn 2016 Review (65) which stated the Publication Plans SAD consultation would begin in early 2017. The Review is delivered to every household in the District thereby ensuring all residents are kept informed of progress with the SAD, and copies can also be obtained from our Leisure Centres or online at www.staffs.gov.uk. Copies of the public notice and Review Articles can be seen in Appendix C.

Drop-In Sessions
1.23 Council officers were available at the Council Offices in Codsall to discuss the Publication Plan SAD during normal working hours (8.45am – 5pm, Monday - Friday) for the full 12 weeks of consultation. Posters were displayed at the Council Offices and sent to all parish councils (see Appendix D).

1.24 In addition to this, 2 drop-in sessions were held where residents and other interested parties could speak with planning officers about the proposals. The sessions were held between 2pm and 7pm on Tuesday 2\textsuperscript{nd} and Thursday 21\textsuperscript{st} February 2017. It was stressed at all the exhibitions, in order for comments to be considered formally under the Regulations, they would need to be made separately in writing. Posters advertising the exhibitions were sent to relevant parish clerks for them to put up at locally.

Summary
1.25 The Publication Plan SAD and accompanying documents were subject to 12 weeks of public consultation, with information being disseminated direct to interested parties and by the deposit of documents at the Council Offices in Codsall, libraries, leisure centres and parish councils across South Staffordshire. There were articles in the Council free newspaper the South Staffordshire Review which is delivered to every household in the District and through social media, including Twitter and Facebook. Two drop in sessions were organised where officers were available to answer queries and officers were also available during normal working hours at the Council Offices in Codsall.
1.26 Key issues raised and number and types of representations made to the Publication Plan SAD consultation are contained in **Part 2 of the Consultation Statement**.

**Previous SAD Consultations 2014 - 2016**

**SAD Preferred Options Consultations**

1.27 Two periods of consultation were held at Preferred Options stage. The first was for just over 8 weeks from **15th December 2015 – 12th February 2016**. This was the main public consultation on the preferred sites.

1.28 The second consultation which ran for 6 weeks from **15th August 2016 – 26th September 2016** was a discrete consultation which was necessary as a result of further work which was undertaken on 3 documents, namely:

- HRA of the cumulative impact of all proposed development including housing, gypsies and travellers
- HRA of employment allocations, cumulative impact of development on protected sites
- A technical note appraising the sustainability (SA) of access options to ROF Featherstone.

**SAD Issues and Options Consultation**

1.29 Three separate public consultations were held for the Issues and Options stage of the SAD for a total of 21 weeks during 2014, including a number of exhibitions/drop-in sessions. These were:

- **Main Issues and Options Consultation** - 17th March – 19th May 2014 (9 weeks)
- **Additional Sites Consultation** - 26th August – 7th October 2014 (6 weeks)
- **Gypsy and Traveller Issues and Options Consultation** - 13th October – 24th November 2014 (6 weeks)

1.30 In addition, the Community Council of Staffordshire were commissioned to undertake independent consultation which took the form of a series of consultation events and a range of social media outlets between Monday 21st April and Friday 8th August 2014.

1.31 The 15 exhibitions carried out by the Community Council were held separately to the main and additional sites consultations and led to the publication of a comprehensive report ‘**South Staffordshire Site Allocations Consultation – A Community View**’.

1.32 A table showing the timeline of consultations carried out and the number of exhibitions that were held can be seen at Appendix E. For more detailed information on the consultations, please see the following consultation statements:

1. [SAD Issues and Options Consultation Statement published December 2015](#)
2. [SAD Preferred Options Consultation Statement published November 2016](#)
South Staffordshire
Pre-Submission Consultation Statement

Part 2

Regulation 22 (1) (c) (iii)-(v) (d)

Publication Plan SAD – Analysis of Responses & Key Issues Raised
2. Publication Plan SAD Consultation

2.1 Part 2 of this Consultation Statement has been prepared to meet the requirements of Regulation 22 – Submission of documents and information to the Secretary of State (1) (c):

(iii) a summary of the main issues raised by the representations made pursuant to regulation 18

(iv) how any representations made pursuant to regulation 18 have been taken into account

(v) if representations were made pursuant to regulation 20, the number of representations made and a summary of the main issues raised in those representations

Responses to the Publication Plan SAD Consultations

2.2 Responses were received from a number of organisations, statutory bodies, planning agents, developers, and interested parties, including residents. Some respondents completed individual response forms highlighting specific policies and/or text within the Publication Plan SAD and the reasons for their objections/support; others responded by way of letter or email and many of the agents/developers included additional documents/evidence to support their responses. Where no issues of soundness or legal compliance relating to a specific policy were explicitly stated, the Council has sought to categorise the substance of the response to the most relevant policy or issue.

2.3 All responses were made available on the Council’s website two weeks after the close of consultation. The Council has also prepared a separate table of representations and responses which summarises the main issues raised by respondents together with the Council’s response along with a reference to any minor modifications that have been proposed as a result of the representation. This Schedule of Publication Plan Representations and Responses is Part 3 of the Consultation Statement.

Analysis of Responses

2.4 Submissions ranged from a single representation from one person or organisation, to multiple documents, particularly in the case of planning agents and/or developers who have provided additional evidence and alternative proposals. The table below shows the numbers of responses received for the Publication Plan SAD consultation. It is important to note that some respondents made multiple submissions, eg by email, letter and response form to the consultation; and also via their MP.

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<tr>
<td>Petitions</td>
<td>1 petition with 12 signatories</td>
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<tr>
<td>Statutory Bodies</td>
<td>30 organisations/individuals submitted 42 documents</td>
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<tr>
<td>Agents/Developers</td>
<td>34 agents/developers submitted 187 documents</td>
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<tr>
<td>Residents/Other</td>
<td>94 people responded with 84 documents. 12 of these documents are made by the same representor (s) but submitted via their MP or local councillor.</td>
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2.5 In reading through all submitted responses it became clear that a single document could contain multiple objections/support or general comments. This means that the number and type of comments is much higher than the number of documents submitted. Comments have been categorised in 3 ways as objections, in support, or where comments have been made that are more general. Responses have firstly been broken down against chapters in the Publication Plan SAD and those submitted to other evidence base and supporting documents.

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<td>Green Belt Review</td>
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<td>Landscape Sensitivity Study</td>
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Key Messages - Summary of Key Responses by Policy/Theme to Publication Plan SAD Consultation

2.6 The Publication Plan SAD contained 9 proposed policies:

1. SAD1 – Local Plan Review
2. SAD2 – The Housing Allocations
3. SAD3 – Safeguarded Land for Longer Term Development Needs
4. SAD4 – Gypsy & Traveller Pitch Provision
5. SAD5 – Employment Land Allocations
6. SAD6 – Green Belt, Open Countryside & Development Boundary Amendments
7. SAD7 – Open Space Standards
8. SAD8 – Lichfield and Hatherton Canals Restoration Project
9. SAD9 - Key Development Requirements
2.7 Former Policy SAD9: The Bratch, Wombourne Policy Area, which was included in the Preferred Options document has been deleted from the Publication SAD. This means that the policy relating to the Lichfield and Hatherton Canals has been renumbered to SAD8; and a new policy Key Development Requirements has been introduced as SAD9.

Chapters 1 - 5

2.8 The first 5 chapters of the Publication Plan SAD are factual and contextual, setting out the progress to date and a summary of the process of how sites have been allocated. The Council received a small number of objections (7) to specific paragraphs in Chapters 4 and 5 on the basis that the SAD is not sound as published. These were re-iterated in subsequent chapters but related to RSS based Core Strategy, lack of OAN and failure to deliver strategic park and ride or engage constructively in respect of a Strategic Rail Freight Terminal. The Council has proposed a modification (MM003) to the wording of SAD1 to clarify the approach to unmet housing needs.

Chapter 6 – The Local Plan Strategy and Policy SAD1

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<td>26</td>
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</tr>
<tr>
<td>SAD1</td>
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<tr>
<td><strong>Total</strong></td>
<td>56</td>
<td>18</td>
<td>3</td>
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2.9 There was some support from the development industry for the Council’s approach to continue with the SAD as the most expeditious way to deliver the Core Strategy and have a complete Local Plan in place, subject to an immediate review of the Plan. However these were outweighed by objections that numbers in the SAD are based on a revoked RSS strategy, exacerbated by a lack of OAN, and the issue of unmet need across the wider Birmingham HMA and a lack of flexibility. There were also objections to the review timetable, in the main that the review of South Staffordshire Local Plan should not be constrained by other emerging plans, notably the review of the Black Country Core Strategy. Solutions put forward included abandoning the SAD and moving to a review of the Local Plan immediately and releasing safeguarded land now to meet additional housing need.

2.10 Historic England objected on the basis that insufficient information has been made available regarding impact on or assessment of the historic environment. This is a consistent response to many chapters and policies. The Council has subsequently prepared a Historic Environment Assessment which seeks to address HEs objections and which identifies mitigation measures that may be needed.

2.11 In terms of employment, there was request for greater clarity on the scope and terms of reference for reviewing employment land requirements, including carrying out a new ELR to look at South Staffordshire’s future need and the role South Staffordshire may have to play in meeting wider functional economic area, particularly the needs of the Black Country. The Council has proposed a modification (MM002) to the wording of para 6.16 to address this.
Policy SAD1 – Local Plan Review

2.12 Whilst there was support for an immediate review of the Local Plan following the adoption of the SAD, the majority of objectors felt that there was insufficient flexibility in the SAD to meet unmet housing requirements of the wider Greater Birmingham HMA and South Staffordshire’s own unmet needs. The main objections were that the SAD is based on out of date housing numbers; does not reflect an up to date OAN; should identify more land now for immediate needs and safeguarding and to ensure permanence of Green Belt boundaries; SAD1 is biased towards housing and does not adequately reflect employment needs; and to commit to a firm date for the review. The Council’s view is that as a tier 2 plan it is not within the scope of the SAD to revisit the adopted strategic policies set out in the Core Strategy. However the Council has proposed a modification (MM003) to Policy SAD1 to add clarity to timescales and employment needs.

Chapter 7 – Housing Sites and Safeguarded Land for longer Term Development Needs and Policies SAD2 and SAD3

<table>
<thead>
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<th>Object</th>
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<td>SAD3</td>
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<td><strong>46</strong></td>
<td><strong>50</strong></td>
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</table>

2.13 Chapter 7 which includes the policies for the identification of housing sites and safeguarded land, received the most objections overall and is where the majority of objections from residents can be found. Representations were split between general policy objections and site specific responses. There is a further breakdown of objections/support/comments by site at Appendix F.

Chapter 7 – General Comments

2.14 There was support for the SAD in that it was the most expeditious route to significantly boosting housing supply, but this was in the context that housing numbers should be uplifted.

2.15 Objections from agents and developers re-iterated the points made to earlier chapters and Policy SAD1 in that the quantum of housing proposed is insufficient and based on revoked RSS strategy; wider needs of GBHMA not taken account of; lack of OAN and 5YHLS for South Staffordshire; lack of flexibility and permanence of Green Belt boundaries. In terms of adjustments to housing numbers to take account of changes to land supply since the Core Strategy, agents and developers were in favour of continuing with the higher numbers. Many submissions advocated increased numbers to meet higher housing needs, both within South Staffordshire and the wider Housing Market Area and that number in the SAD should be a minimum. It was also stated that non-Green Belt sites had not been fully explored.

2.16 Many objections by agents and developers were that alternative sites should have been included instead of, or in addition to, the identified sites and this was expanded on further in site specific comments.
2.17 Other comments were made regarding the impact on the natural environment, impact on the Strategic Road Network, impact on heritage assets and infrastructure in general. In addition to the Historic Environment Assessment, the Council is proposing a further modification (MM021) to add clarity to the mitigation measures that will be expected on a site by site basis.

Policy SAD2 – The Housing Allocations

2.18 A significant proportion of the comments received from agents, developers and residents was site specific. There was general support for sites from the agents/developers/landowners of allocated sites, with the majority indicating that they could/should be delivered at higher levels of development. Some agents/developers queried the methodology and scoring of a site which led to it being selected for allocation. Additional evidence has been submitted by some respondents to support assertions that the Council has assessed sites incorrectly.

2.19 Main objections from agents/developers to sites included incorrect assessment/site selection against evidence base; evidence base retrofitted to sites; extra sites will be needed over and above those identified; allocations not in accordance with NPPF; alternative sites should have been considered/allocated; sites should be extended where suitable for greater development capacity now. In line with previous submissions, housing numbers and levels of development were considered out of date.

2.20 Statutory bodies responded with both general and site specific comments. The main issues raised included the impact on the road network at Codsall/Bilbrook, Pendonford, Perton and Potters Cross, Kinver; need for education contributions and proximity to mineral operations (Staffordshire County Council). The Environment Agency and Heritage England requested reference be made to land contamination, easements, improvements to watercourses and impact on heritage assets. The Council has proposed a number of modifications (MM008, MM009, MM010, MM011, MM012, MM013, MM021, MM029) to address these matters and is confident that mitigation matters will be fully considered at the planning application stage. A further modification (MM004) is proposed to address inconsistencies in the information contained in pro-formas.

2.21 Although there were a small number of responses from residents in support of allocated sites, the overwhelming majority objected to the inclusion of one or more sites in the Publication SAD. There were a number of sites specific issues raised and also many general comments, in the main regarding the capacity of facilities and services to cope with new development; loss of Green Belt; flood risk and sewerage; highway infrastructure and access; pollution; impact on the environment, and mining. A consistent theme throughout responses from residents was that insufficient consultation had been carried out. This related to sites and the SAD process in general, and more specifically at Swindon on the change to the housing site identified in the Publication SAD, which was different to that consulted on at Preferred Options.

2.22 Details of all responses submitted, including site specific comments, the Council’s response and reference to modifications proposed, can be found in a separate Consultation Statement Part 3 - Schedule of Publication Plan Representations and Responses.
Policy SAD3 – Safeguarded Land for Longer Term Development Needs

2.23 There was support for the principle of safeguarding land for longer term development needs but the overwhelming view from agents and developers was that the quantum of safeguarded land was insufficient and the distribution inappropriate. Many considered that alternative sites should have been identified, instead of or in addition to those in SAD3 or that safeguarded land should be allocated now. There was significant support from the development industry for an increase in the amount of land to be safeguarded - to recognise that South Staffordshire’s housing numbers are not an OAN; that there is a wider HMA housing shortfall; if/when the Council cannot demonstrate a 5YHLS; or that the principle of enduring Green Belt boundaries would not be met.

2.24 There were objections to the inclusion of land at Hobnock Road, Essington in the sites identified for safeguarding as the site has now been granted planning permission through the development management process. It was considered that this therefore left a gap in the overall level of safeguarded land that was required and a number of agents/developers put forward land as an alternative.

2.25 There was a view that safeguarded land should not have been restricted to main and local service villages but should have been more comprehensive and extended to lower order settlements, urban extensions and at villages where non-Green belt options were available. There was support for the principle of safeguarding land to be extended to employment land options.

2.26 It was also stated that given the commitment by the Council to immediately review the Local Plan (Policy SAD1) that Policy SAD3 served no purpose as the need and context for safeguarding land has altered and that the policy should be deleted from the plan.

2.27 A significant proportion of the comments received from agents, developers and residents to Policy SAD3 was site specific. There was general support for sites from the agents/developers/landowners of proposed safeguarded sites, with the majority indicating that they could/should be delivered at higher levels of development and were available immediately.

2.28 Statutory bodies responded with both general and site specific comments. The main issues raised included the impact on the road network at Codsall/Bilbrook, Pendeford, Perton and Potters Cross, Kinver; need for education contributions and proximity to mineral operations (Staffordshire County Council). Historic England requested references be made to Historic Landscape Characterisation and historic field boundaries. The Environment Agency highlighted the need for the involvement of the lead local flood authority in bringing sites forward. The Woodland Trust requested changes in proformas to recognise the need to protect ancient woodland. The Council has proposed a number of modifications (MM009, MM010, MM012, MM014, MM015, MM029) to address these matters and is confident that mitigation matters will be fully considered at the planning application stage. Further modifications (MM004, MM005) are proposed to address inconsistencies in the information contained in proformas.

2.29 The majority of responses from residents were objections to the inclusion of one or more safeguarded sites in the Publication Plan SAD. There were a number of sites specific issues raised and also many general comments, in the main regarding the capacity of facilities and services to cope with new development; loss of Green Belt; flood risk and sewerage; highway infrastructure, access and parking; pollution; impact on the environment including landscape. A consistent theme throughout responses from residents was that insufficient consultation
had been carried out. This related to sites and the SAD process in general, and more specifically safeguarded land at Pattingham, Swindon and Wombourne where there were changes to the safeguarded sites identified in the Publication SAD, which were different to those consulted on at Preferred Options.

Chapter 8 Gypsy and Traveller Pitch Provision and Policy SAD4

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<td><strong>5</strong></td>
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2.30 Agents representing Gypsy and Traveller families objected to the thrust of Chapter 8 on the basis that the evidence in the GTAA which underpins the SAD is out of date and does not represent an OAN for Gypsy and Traveller families. Whilst they supported the sites identified in SAD4, they also felt that additional pitches should be provided on identified sites in addition to extra pitches at other locations because of a much higher need than was evidenced. An objection was raised that pitches in SAD4 were not proposed to be removed from the Green Belt, but were to remain washed over. It was also stated that pitch provision is not consistent with PPTS or the Housing Act.

2.31 The Environment Agency and Canal and River Trust commented on foul drainage arrangements for sites and the proximity of one site to a flood risk zone and of others to the canal network. Historic England maintained their consistent objection that further assessment is required to identify potential impacts on heritage assets including the canal conservation area. The Council has proposed a modification (MM020) to Policy SAD4 to ensure site specific mitigation measures identified in the Historic Environment Assessment are delivered.

2.32 Residents, local Councillor, parish councils and Longford Residents’ Group objected to a number of issues including the principle of making temporary permissions permanent; impact on social cohesion; impact on highways and accessibility; impact on local services and school places. A local community group was concerned that the spatial distribution of pitches is heavily weighted in the northern part of the District.

Chapter 9 – Employment Land and Policy SAD5

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<td><strong>8</strong></td>
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</table>

2.33 The view of the development industry was that insufficient land had been identified for employment use in the Publication Plan SAD and that the policy, as worded, was not flexible enough to meet future needs for high quality employment sites to serve the needs of the Black Country. There was support for the principle of extensions to i54 South Staffordshire and ROF but there were suggestions of greater land area to be identified as extensions together with
additional/alternative sites. One respondent requested that a site within a development boundary be removed from employment use through the SAD.

2.34 Agents promoting the Strategic Rail Freight Interchange (currently the subject of a DCO) confirmed there was still a need for an RLS to service the Black Country and Southern Staffordshire and noted that decisions made regarding the DCO for West Midlands Interchange would need to be considered through the subsequent review of the Local Plan.

2.35 The Woodland Trust requested that reference to the protection of Ancient Woodland be included in the SAD, however this is already covered by existing policies in the Core Strategy. The National Trust raised objections to the wording of paragraph 9.26; the omission of ROF road options in insets maps 14 and 17; and the lack of reference to mitigation or minimisation of development at ROF Featherstone on Moseley Old Hall and its surrounds. The Council has proposed modifications (MM024, MM025) to address these matters.

Policy SAD5 Employment Land Allocations - i54 South Staffordshire

2.36 Site promoters and landowners, Wolverhampton City Council and JLR supported the proposed extension to i54 South Staffordshire. However, the land owners propose that additional land to the north should be identified as a further extension. It was suggested that additional land should be identified now, or be safeguarded in the SAD to meet future demand so that there is a sufficient reservoir of land for future employment needs. JLR requested that a mapping error on Inset Plan 42 be corrected and the Council has proposed a modification (MM006) to address the matter.

2.37 In terms of statutory consultees, Staffordshire County Council recommended that provision is made for green infrastructure which will protect environmental assets. The Canal and River Trust requested a policy wording change to reflect the need for a Transport Assessment which takes account of the impact of increased traffic on canal structures. The Council has proposed a modification (MM 019) to address this matter.

2.38 There were no comments from residents specific to i54 South Staffordshire.

Policy SAD5 Employment Land Allocations – ROF Featherstone

2.39 The agents promoting ROF Featherstone supported the extension and allocation of the site and this was advocated further by Wolverhampton City Council and agents promoting the adjoining residential allocation. There was also support from two local councillors for the principle of bringing forward a long standing commitment for employment use of the site. The Councillors highlighted the importance of the buffer/strategic gap between the ROF extension and proposed residential site and requested that a greater area than proposed was identified as an area of Local Green Space. Featherstone Parish Council also commented that there should be a permanent buffer with robust boundary treatments. However, representatives of an alternative site objected on the basis that deliverability of ROF had not been demonstrated and that viability was uncertain.

2.40 The main objections to ROF Featherstone related to access, particularly a suitable Road Option, and the impact on the setting of Moseley Old Hall, which is a Grade II* listed building. The National Trust (including a petition of 12 NT members), Heritage England and Wolverhampton MP, Emma Reynolds objected to Road Option 9 which is closest in proximity to Moseley Old Hall because of the
potential significant negative impact on the Hall and its setting, on the surrounding Green Belt and because the road would sever the relationship between the Hall and other listed buildings, notably Northycote Farm. Heritage England further objected that no reference had been made to the historic environment or possible mitigation measures. The Council has proposed a modification to the wording of SAD5 (MM033) which adds clarity by way of the provision of a Heritage Assessment.

2.41 There were 2 objections from residents which were in relation to Road Option 9 specifically the loss of Green Belt; insufficient evidence of need; lack of capacity in surrounding road network; impact on amenity; loss of Ancient Woodlands, flora and fauna; impact on Moseley Old Hall and surrounds and other heritage assets.

Chapter 10 – Green Belt and the Open Countryside and Policy SAD6

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<td><strong>3</strong></td>
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2.42 With the exception of an objection by a local councillor who supports the designation of a strategic gap as Local Green Space adjacent to ROF Featherstone, all other responses were from agents and developers. There was support from agents for changes to Green Belt boundaries at Cheslyn Hay and Great Wyrley at allocated sites. The Council has proposed a modification (MM007) to rectify a cartographic error on Inset Plan 44.

2.43 Objections to changes to boundaries were on the basis that insufficient land has been identified for allocation or safeguarding, reiterating objections made to SAD2 and SAD3; or that alternative sites should be removed from the Green Belt.

2.44 There were no objections from residents to SAD6, nor to the proposals to redraw boundaries to recognise built development at Brewood, Essington, Huntington and Baggeridge.

Chapter 11 – Other Site Allocations and Site Specific Policies and Policies SAD7 and SAD8

<table>
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<td><strong>2</strong></td>
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</table>

Policy SAD7 – Open Space Standards

2.45 Agents representing developers at Site 239 in Perton requested an amendment to Policy SAD7 that allotments can form part of open space provision on site, however this was considered to be an additional benefit provided as a result of community consultation.
2.46 The Woodland Trust requested an amendment to policy wording to refer to Woodland Access Standards. The Council considers it would be appropriate to consider this through the review of the Local Plan.

**Policy SAD8 – Lichfield and Hatherton Canals Restoration Project**

2.47 There was support from the Canal and River Trust and the Lichfield and Hatherton Canals Trust for the policy and the protected route. There were a number of requests to make minor amendments to the titles of inset plans and the removal of erroneous policy references. The Council has proposed modifications (MM001, MM016, MM017, MM031 and MM032) to address these matters.

**Chapter 12 – Development Requirements and Policy SAD9**

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2.48 Representations received to Policy SAD9 were from agents, developers and statutory bodies. There was support for the identification of canals as green infrastructure and for the consideration of mineral resources in the policy.

2.49 The agents for the promotion of land at The Bratch in Wombourne supported the deletion of Preferred Options Policy SAD9 which proposed the continuation of a policy area brought forward from the previous 1996 Local Plan.

2.50 The majority of objections to Policy SAD9 were in relation to reference in the policy to conformity with Core Strategy policies including affordable housing and housing mix, requirement for a Transport Assessment, and lifetimes homes or renewable energy requirement which are now contrary to national policy and would be better addressed through the review of the Local Plan. Respondents felt that as these policies are now out of date, reference to them in a SAD policy should be removed. There were also objections to the introduction of a requirement to consider self build which was seen as too restrictive.

2.51 Objections were received from the National Trust and Historic England to the wording in the policy which they considered was not consistent with national policy. The Council has proposed a modification (MM023) which addresses these concerns. The Woodland Trust requested a number of changes to the policy to reflect standing advice, buffer zones and the exceptional circumstances required to justify the loss and ancient woodlands or trees, however the Council considers that this is satisfactorily covered by Core Strategy policy or would addressed through a planning application.

2.52 Staffordshire County Council requested a textual change to wording relating to the SuDS Handbook and the Council has proposed a modification (MM018) to address this.

**Responses to Supporting Documents**

**Publication Plan SAD Methodology Paper**

<table>
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<tr>
<td>SAD Methodology Paper</td>
<td>19</td>
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</table>
2.53 The Methodology Paper that was published with the Publication Plan SAD was a revised version of that published in December 2016 as part of the Preferred Options consultation. The revisions had been made as a result of the comments received to the earlier version.

2.54 There was support from the development industry for the refined methodology, saying the assessment process was thorough, robust, effective and that the RAG scoring was clear.

2.55 The main thrust of the objections was not to the principle of the methodology, but more to the outcomes, in general on a site specific, individual criteria basis. One respondent felt that the Green Belt and Sequential Test criteria overlapped and that the role of landscape in the site selection process had been exaggerated. The majority of objections disputed the Council’s scoring of individual sites and considered that the Council had assessed sites incorrectly and that changes should be made. Comments were also made that the provision of additional material through responses which could mitigate against scoring outcomes in the methodology paper had been ignored. Some objectors had provided their own evidence and alternative site scoring to a number of criteria and which would have the effect of making their site more suitable. It was also asserted that there was an inconsistency in applying the methodology to some sites.

2.56 Comments were received about the two tier approach to site selection with one respondent saying that the Tier 1 assessment had distorted the outcomes of the SA and others who felt that their sites had been wrongly omitted from Tier 2 assessment. There was also an objection that the combined effects of residential development and proposed extensions to ROF Featherstone for employment had not been properly considered.

2.57 Staffordshire County Council requested wording changes to improve clarity of the document and the Council has proposed changes to the document (Changes 3 & 4) to address this matter.

2.58 There were no comments from residents on the methodology paper.

**Green Belt Review**

<table>
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<tbody>
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</table>

2.59 Responses were only submitted at Publication stage by planning agents and/or developers to the Green Belt Review. There was some support for the Green Belt Review and general objections that the scale of safeguarded land identified using the study was insufficient, that the parcels were not sufficiently large, cumulative impact of development had not been assessed and that the study was too broad brush. A number of respondents submitted evidence and/or comments that these studies had not assessed parcels of land appropriately, and that as a result some sites had not been scored correctly. Some planning agents submitted their own assessments as alternatives to the Green Belt Review, whilst others felt that amendments should be made to the published document. Comments were made that the strategic nature of the Green Belt parcels/Landscape cover parcels disadvantaged some sites and that a more fine grained approach should have been taken in the applying the methodology.
Landscape Sensitivity Study

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<tr>
<td>Landscape Sensitivity Study</td>
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</table>

2.60 There was support for the Landscape Study from Staffordshire County Council and from developers and agents for the broad methodology. There were objections to the size and nature of land cover parcels, but mainly that some parcels of land had not been assessed appropriately, and that as a result some sites had not been scored correctly. Some planning agents submitted their own assessments as alternatives to the Landscape Sensitivity Study, whilst others felt that amendments should be made to the published document.

Employment Land Study

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<tbody>
<tr>
<td>Employment Land Study</td>
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</table>

2.61 Both objections were from planning agents on behalf of landowners with employment land interests. One objection related to the assessment of employment land identified in the ELS 2013 and which is now out of date. The other objection was that the assessment of employment needs in the sub-regional South Staffordshire and Black Country ELS 2015, was not in line with the overall plan period, and that the need for high quality employment sites had not been correctly assessed and therefore there is a need for additional employment land.

Sustainability Appraisal & HRA

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2.62 There was support from the Environment Agency for the Sustainability Appraisal as being sufficient to assess the environmental impact of the SAD. Objectors were concerned that Green Belt boundaries would not endure beyond the Plan period; that a new site should have been appraised as a reasonable alternative; and that the SA failed to assess the combined effects of an allocated site with an adjoining safeguarded site. With regard to employment there is an objection that no in-combination assessment has been made of the cumulative impacts of extensions to ROF Featherstone and sites proposed for allocation/safeguarding.

2.63 Natural England requested two amendments to reflect the up to date position with regard to the SAC; and to correct a typographical error. The Council has proposed changes (Change 5 & 6) to address these matters.

Statement of Community Involvement (SCI)

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2.64 Of the 30 objections to the SCI, 29 were from local residents and one from Pattingham and Patshull Parish Council. Objections fall into two main categories.
Firstly, that there has been insufficient consultation carried out in relation to the SAD and specific sites; and secondly that the correct process has not been followed. There were general comments that the SAD process was not sufficiently well publicised and that local people were not made aware of the process and of the sites that were being considered locally.

2.65 As a result of representations made at Preferred Options Stage, changes to evidence base documents and the re-assessment of all sites, there were 4 villages where sites included in the Publication Plan were not the same as those in the Preferred Options consultation. These sites are at Great Wyrley (allocated and safeguarded land) Pattingham (safeguarded land), Swindon (allocated and safeguarded land) and Wombourne (safeguarded land). Many respondents felt that a further public consultation should have been undertaken prior to Publication, on these changes. However, all sites have been considered and consulted on at some stage of the preparation of the SAD and no new sites were introduced at Publication stage.

Infrastructure Delivery Plan (IDP)

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</table>

2.66 Environment Agency raised concerns about the operational capacity relating to drainage of some villages (Kinver, Swindon and Wombourne). These have been noted and will be discussed with Severn Trent Water as the SAD develops.

2.67 Agents Lichfields objected to the lack of information regarding works to the A41 junction in relation to development at Perton and the deliverability of the proposed allocated site. The Council has proposed a modification (MM029) to address this matter.

Viability Study

<table>
<thead>
<tr>
<th>Evidence Base/Supporting Document</th>
<th>Object</th>
<th>Support</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Viability Study</td>
<td>1</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

2.68 A representation on behalf of housebuilder Taylor Wimpey supported the principle of self build, but objected to the imposition of self build through Policy SAD9 stating that this assessment should be made through individual viability assessments.

Summary

2.69 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 Co-operate. This resulted in two periods of public consultation in early 2017 for an overall total of 12 weeks.

2.70 The consultations were widely publicised through a variety of means including online, posters, public exhibitions, the Council’s Review newspaper, and social media including Twitter and Facebook. Officers were available throughout the consultations to answer queries and discuss the proposals in person, by telephone and through email.
2.71 The responses to the consultations have been read and recorded and the information in them has been used to take the SAD forward to submission to the Secretary of State. This has resulted in a number of modifications to the SAD and to the supporting documents. These will be reflected in track change documents and are detailed in separate modification and change tables.

2.72 All responses received to the Publication Plan SAD consultation are available on the Council’s website and copies/links will be appended to this Consultation Statement at Appendix G. A summary of the representations received, the Council’s response and any modifications proposed can be found in Part 3 of this Consultation Statement.