SOUTH STAFFORDSHIRE COUNCIL
SOUTH STAFFORDSHIRE LOCAL PLAN

EXAMINATION OF THE
SITE ALLOCATIONS DOCUMENT

GUIDANCE NOTE AND
SCHEDULE OF MATTERS, ISSUES &
QUESTIONS FOR EXAMINATION

Deadline for submission of further statements: 3 November 2017

Hearing sessions commence: 28 November 2017

Inspector: Stephen J Pratt BA(Hons) MRTPI

Programme Officer: Amanda Willis
Programme Officer
South Staffordshire Council
Council Offices
Wolverhampton Road
Codsall
South Staffordshire
WV8 1PX

Telephone no: 07958-562954
e-mail: Programme.Officer@sstaffs.gov.uk

Hearings venue:
Council Offices
Wolverhampton Road
Codsall
South Staffordshire
WV8 1PX

Web-site:
https://www.sstaffs.gov.uk/planning/sad-submission-and-examination.cfm
1. The South Staffordshire Local Plan Site Allocations Document (SAD) (the “Plan”) was published in January 2017 and submitted to the Secretary of State for examination on 15 September 2017. The Inspector has prepared this Guidance Note to assist everyone who wishes to be involved in the Examination of the Plan.

2. It is important that everyone who wishes to be involved in the Examination takes account of this Guidance Note. Please note that only those who made representations on the Publication Draft of the Plan during the prescribed period are involved in the Examination process, and only those who seek some change or object to the Plan are normally involved in any hearing sessions.

3. The Secretary of State has appointed Planning Inspector Stephen J Pratt BA(Hons) MRTPI under Section 20 of the Planning & Compulsory Purchase Act 2004 to carry out the independent examination of the South Staffordshire Local Plan SAD.

4. The Programme Officer for the Examination is Amanda Willis, who is an independent officer of the Examination, working under the Inspector’s direction. She helps to organise the Examination programme, maintains the Examination library, records and circulates all material received, and assists the Inspector with procedural and administrative matters. She will advise on any programming and procedural queries, and any matters which the Council or participants wish to raise with the Inspector should be addressed to the Programme Officer. Her contact details are on the cover sheet of these notes.

5. The purpose of the Examination is to examine the soundness and legal compliance of the Plan. The Examination starts when the Plan is submitted to the Secretary of State and ends when the Inspector’s report is sent to the Council. The Inspector has already begun his initial examination of the Plan and has asked the Council for information on various matters.

6. The Inspector’s role is to assess whether the Plan has been prepared in line with the relevant legal and procedural requirements set out in Sections 19-20 of the 2004 Act (as amended) and associated regulations, including the Duty to Cooperate, and whether it is sound in terms of the guidance in the National Planning Policy Framework. The Examination will focus on these requirements. The Council should rely on evidence collected while preparing the Plan to demonstrate that it is sound. Those seeking to change the Plan need to specifically demonstrate why the submitted Plan is unsound and/or not legally compliant.

7. At Publication stage, some 159 organisations, bodies, agents, developers, local residents and others submitted 656 duly made representations. These relate to most of the policies and proposed site allocations in the Plan. However, the Examination is not solely based on points raised in the representations, but needs to consider the legal compliance and soundness of the whole Plan, particularly in terms of consistency with national planning policy.

8. The Inspector has prepared this Schedule of Matters, Issues & Questions (MIQs) for Examination so that he can have further information about the main matters and issues that are fundamental to the legal compliance and soundness of the Plan. It is based on the Planning Inspectorate’s latest Procedural Guidance, and is informed by the guidance in the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG), having regard to the representations made to the Publication version of the Plan and the supporting evidence. All participants should be aware of this published guidance.

---

1 Examination document: PS.A002/PS.B001
2 Procedural Practice in the Examination of Local Plans [PINS; June 2016]
3 National Planning Policy Framework [DCLG; March 2012]; Planning Practice Guidance [DCLG]
9. This Schedule lists the main MIQs to be addressed during the Examination. The Council is requested to respond on all the MIQs listed, referring to information in the Submission Documents & Background Evidence (limited to 3000 words per Matter/Policy/Site). If other participants wish to submit further statements (limited to 3000 words) they should only address specific MIQs relevant to points made in their original representation(s), without raising new issues or submitting further evidence, appendices or supplementary material unless it is requested by the Inspector. The Examination process does not provide the opportunity to submit new evidence, new points or other material, since all supporting material should have been submitted with the original representations.

10. All further statements should be received by the Programme Officer no later than 4.00pm on Friday 3 November 2017 (3 x A4 paper copies and one electronic copy). All material that participants wish to put before the Inspector should be submitted by this deadline. The Inspector is unlikely to accept further/new information/evidence during the Examination, unless he specifically requests it. Participants may refer to information in earlier representations, but the Inspector only has copies of the representations made on the Publication version of the Plan. Further statements are not needed unless they relate to the legal compliance or soundness of the Plan, as set out in this Schedule of MIQs. Written representations carry the same weight as those made orally, and participants do not need to submit any further statements if they wish to rely on their original representation(s) on the Publication version of the Plan.

11. The hearing sessions will commence at 10.00am on 28 November 2017 at the Council Offices in Codsall; further details will be provided when these sessions have been arranged. Detailed agendas will be issued shortly before they commence, based on the MIQs for Examination and the responses received. However, the Inspector is unlikely to introduce new issues or questions that do not arise from the topics and issues identified. Anyone can attend the public hearings as an observer, but only those listed in the programme can participate in the relevant hearing session. Normally, only those who seek some change or object to the Plan are entitled to participate in the hearing sessions, but others may be invited if they can contribute positively to the discussion or assist the Inspector.

12. The hearings will focus on legal compliance and the requirements for soundness set out in the NPPF (¶ 182). As well as complying with the legal requirements, the Plan has to be positively prepared, justified, effective and consistent with national policy⁴. The purpose of the hearings is to focus on the main matters and issues that the Inspector considers to be fundamental to the soundness of the Plan in terms of the policies and proposed site allocations. Legal and strategic matters are likely to be dealt with first, before turning to the proposed site allocations. The Inspector will consider all the representations and evidence, but these do not dictate the structure or focus of the hearing sessions.

13. The hearing sessions will take the form of an informal round-table discussion, structured around the Inspector’s MIQs, rather than discussing individual representations or presenting participants’ cases. Participants challenging the policies and proposed site allocations should clearly explain why the Council’s approach is unsound, and why the policies and/or proposed sites are not justified, available, effective, deliverable, developable, viable or soundly based.

14. Participants should note that any failure to fully discharge the legal requirements relating to the Duty to Co-operate cannot be rectified as part of the Examination process. Furthermore, the scope for making substantial or fundamental changes to the Plan after it has been submitted to the Secretary of State is limited, particularly where they have implications for the Sustainability Appraisal, the consultation processes already undertaken, and the underlying strategy. “Main Modifications” can only be recommended by the Inspector where the Council has asked him to recommend them in order to make the Plan sound and/or legally compliant. Any such proposed changes will be subject to the same process of publicity, opportunity to make representations and Sustainability Appraisal as the original Plan.

⁴ National Planning Policy Framework (¶ 182) [DCLG; March 2012]
15. Several participants have put forward additional/alternative “omission” sites. However, the purpose of the Examination is to consider whether the submitted Plan, with its proposed site allocations, is sound. The Examination will concentrate on whether those sites allocated in the submitted Plan are sound, and participants should focus on this issue, rather than promoting their own sites. If the Inspector considers that additional/alternative sites are needed, then he will request the Council to put forward alternatives, and these would be considered during the later stages of the Examination. This approach will apply to housing and employment sites, Safeguarded Land, Gypsy & Traveller sites and development boundaries.

16. The Inspector notes that several participants challenge the soundness of the overall housing provision figure on the basis that it is out-of-date and based on the currently adopted Core Strategy. However, recent legal judgements confirm that a Site Allocations Plan does not need to reconsider the overall housing provision figure provided that its scope is limited to allocating sufficient sites to fully meet the need established in the adopted Core Strategy. Furthermore, subsequent Development Plan Documents are not required to rectify any shortcomings in the Core Strategy’s approach to housing land provision and supply. Such matters should more appropriately be addressed as part of a review of the Core Strategy.

17. This Schedule of MIQs is based on current national planning policy (as at 6 October 2017). If further announcements are made about national or local planning policy or the scope and nature of the Examination, the agenda and content of the MIQs may need to be amended.

18. The Examination Library is currently being prepared, based on the evidence base accompanying the submitted Plan. It can be viewed on the Council’s web-site and is available for inspection at the Council’s offices at Codsall. It contains copies of the Plan, along with associated documents, representations and the Examination Library, including the Submission Documents and Background Evidence; further statements and documents will be added, when received by the Programme Officer. Lists of documents, the up-to-date Programme for the hearing sessions and other material will also be on the Examination web-page.

19. The Inspector will familiarise himself with the district, visiting relevant places and sites referred to in the Plan and representations on an unaccompanied basis. If there are particular places or sites which participants wish him to visit, or need an accompanied visit, they should discuss this with the Programme Officer.

20. The Examination remains open until the Inspector’s report is submitted to the Council. However, the Inspector will not accept any further representations or evidence during the Examination unless he specifically requests such material. Any late or unsolicited material is likely to be returned.

21. After the hearings have closed and, if necessary, any “Main Modifications” needed to ensure the Plan is sound and can be adopted have been published and subject to consultation, the Inspector will prepare a report for the Council with his conclusions and recommendations. This report will deal with the main issues relating to the soundness and legal compliance of the Plan, taking into account the representations and discussions, but it will not deal with individual representations. The Planning Inspectorate will confirm the likely date later in the Examination process.

22. In carrying out this Examination, the Inspector will aim to work in a proactive, pragmatic and consensual manner with the Council and other participants, with the aim of delivering a positive outcome, recognising that this is the Council’s plan. He will expect all participants to act in a similarly co-operative manner, adopting a positive approach to the Examination process. Any queries that participants wish to raise should be addressed to the Programme Officer. Participants should keep up-to-date with the latest situation by checking the Council’s Examination website.

---

5 including Cooper Estates v Tunbridge Wells BC [2017; EWHC 224 (Admin)]; Oxted Residential Ltd v Tandridge DC [2016; EWCA Civ 4140]; Gladman Development Ltd v Wokingham BC [2014; EWHC 2320 (Admin)];

6 https://www.sstaffs.gov.uk/planning/sad-submission-and-examination.cfm
EXAMINATION OF THE SOUTH STAFFORDSHIRE SITE ALLOCATIONS DOCUMENT
SCHEDULE OF MATTERS, ISSUES AND QUESTIONS FOR EXAMINATION

MATTER 1: LEGAL & PROCEDURAL REQUIREMENTS & DUTY TO CO-OPERATE

Key issues:

1.1 Has the Site Allocations Document (SAD) had regard to and been prepared in accordance with the current Local Development Scheme, Local Planning Regulations, and national planning policy, including the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG)?

1.2 Has adequate public consultation and community involvement taken place on the SAD, in accordance with the procedures set out in the Local Planning Regulations and the Council’s Statement of Community Involvement?

1.3 Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA):
   a. Has the SA been prepared having regard to the requirements of the Strategic Environmental Assessment Directive and Regulations and guidance in the PPG, is it clear how the SA influenced the final plan and dealt with mitigation measures, and has it considered cumulative impact and alternative strategies/sites?
   b. Has the Council prepared an adequate and up-to-date HRA to ensure that the SAD does not adversely affect any nature conservation sites protected by European legislation, including the Cannock Chase Special Area of Conservation?
   c. Are there any outstanding issues arising from the evidence and approach of the SA & HRA, including from Natural England, Environment Agency and other parties, and if so, how will these be resolved?

1.4 What is the purpose and scope of the SAD in terms of its relationship and consistency with the adopted South Staffordshire Core Strategy?

1.5 Has the SAD been prepared in accordance with the Duty to Co-operate (DTC), particularly whether the Council has discharged its duty to maximise the effectiveness of the plan-making process and co-operated and engaged with neighbouring local planning authorities and prescribed bodies on an on-going basis with regard to strategic priorities and issues, including:
   i. Strategic priorities and cross-boundary issues identified in the adopted Core Strategy, SAD and other supporting evidence;
   ii. Emerging evidence and issues relating to adjoining local plans, including the Black Country Core Strategy and Greater Birmingham Housing Market Area, and the latest position on these issues and discussions, including any Memoranda of Understanding/Statements of Common Ground?
   iii. Neighbouring authorities: are all neighbouring authorities satisfied that South Staffordshire Council has fully met the DTC requirements, and is there evidence to confirm the situation? Are there any outstanding or unresolved issues relating to the DTC?

1.6 Should the SAD be progressed to adoption, bearing in mind that the development requirements in the adopted Core Strategy were based on outdated information used for the revoked Regional Spatial Strategy and did not establish a full objective assessment of housing need, and in view of the current issues relating to unmet housing need across the wider Birmingham Housing Market Area?

---

8 Detailed aspects of consistency with national policy, including the National Planning Policy Framework [DCLG; March 2012] and Planning Practice Guidance, and with the adopted Core Strategy, will be dealt with under later topics and issues
9 Detailed aspects of the Local Plan Review and the relationship with adjoining plans will be dealt with under Policy SAD1
MATTER 2: LOCAL PLAN STRATEGY & STRATEGIC POLICIES (GENERAL)

Key issue:
Is the approach to the Local Plan Strategy, including the review of the Local Plan, housing and employment land provision, Green Belt, Safeguarded Land, Open Countryside and Gypsies & Travellers, consistent with national policy and with the policies in the adopted Core Strategy, and is it justified, positively prepared, effective, deliverable, viable and soundly based?

2.1 Local Plan Review (Policy SAD1)
   a. Is the approach to reviewing the Local Plan Strategy, including its scope, timescale and terms of reference, consistent with national policy in the NPPF & PPGs and with the adopted Core Strategy, and is it positively prepared in terms of meeting objectively assessed needs, including the flexibility to address identified cross-boundary development needs?
   b. How will the proposed review of the Local Plan enable emerging evidence relating to the review of the Black Country Core Strategy and the wider Greater Birmingham Housing Market Area to be effectively addressed in a timely manner?
   c. Does the approach to reviewing the Local Plan include all relevant matters and sufficient detail, including future housing and employment land provision, gypsy and traveller provision and other district-wide and cross-boundary development needs and strategic priorities?

2.2 Housing Provision (Policy SAD2) - General
   a. Is the approach to housing provision consistent with national policy in the NPPF & PPGs and policies in the adopted Core Strategy, including positively seeking opportunities to meet identified housing needs with sufficient flexibility to adapt to change?
   b. Is the proposed spatial distribution of proposed housing land provision, including the amounts of new housing allocated to each settlement, consistent with the adopted Core Strategy (Policies CP1 & CP6), the sequential approach to development and the availability of sites and capacity of each settlement?
   c. Is the overall amount and spatial distribution of proposed housing land deliverable and developable within the current plan period, will it ensure that there is a 5-year supply of housing land throughout the plan period, and does it provide sufficient choice and flexibility of sites to meet current and future housing needs?
   d. Does the SAD take sufficient account of previously developed/brownfield land, windfall sites, completions and commitments in its proposed housing provision, and has it fully assessed and maximised the use of all reasonable and realistic non-Green Belt land?
   e. The latest evidence on housing land supply [SD102] confirms that, at present, the Council can demonstrate a housing supply of only 4.39 years, based on the most recent objective assessment of housing need for South Staffordshire (270dw/year) [SD080]. What implications does this have for the SAD, and will the Council be able to demonstrate a 5-year supply of housing land when the SAD is adopted?

2.3 Safeguarded Land (Policy SAD3) - General
   a. The adopted Core Strategy (Policy GB2) commits to identifying Safeguarded Land equivalent to 10 years’ housing supply. Is the approach to Safeguarded Land in the SAD consistent with national policy in the NPPF and the adopted Core Strategy, including the amount, location and spatial distribution of Safeguarded Land?
   b. Does the SAD identify sufficient Safeguarded Land for at least 1,750 dwellings to ensure that longer-term development needs can be met and Green Belt boundaries will endure beyond the current plan period, bearing in mind the latest assessment of the amount of Safeguarded Land, the likely density of development [SD098] and the possible need to meet cross-boundary development needs in the future?
   c. Should some Safeguarded Land be released now for development or identified as “reserve” sites?

2.4 Gypsy & Traveller Provision (Policy SAD4) - General
   a. Is the approach to gypsy and traveller (G&T) provision consistent with national policy in Planning Policy for Traveller Sites [DCLG; August 2015] and with the adopted Core Strategy (Policy H6)?
   b. Is the proposed G&T provision based on up-to-date and reliable evidence on the objectively assessed need for such provision? What are the implications of the latest Gypsy & Traveller Accommodation Assessment [SD105] which indicates a shortfall of 11 pitches (5 years) and 33 pitches (2013/14-2027/28) and how will this be addressed?

10 Planning policy for traveller sites [DCLG; August 2015]
c. Does the SAD allocate sufficient land and pitches to meet the identified need for G&T provision in suitable and appropriate locations and spatial distribution?
d. Should the proposed G&T sites remain in the Green Belt or should they be removed from the Green Belt?

2.5 Employment Provision (Policy SAD5) - General
a. Is the general approach to the provision of employment land in the SAD consistent with national policy in the NPPF & PPGs and with the adopted Core Strategy (Policies CP1 & CP7), and does it provide the necessary flexibility and contingency to meet future employment needs and respond to changing economic circumstances?
b. The adopted Core Strategy (¶ 9.5) refers to a strategic approach to meeting identified employment need by developing land within the boundaries of the district’s four free-standing Strategic Employment Sites, or as modest extensions to these sites, where justified by robust evidence. On what basis was it decided to allocate modest extensions at only two of the district’s Strategic Employment Sites?
c. Does the SAD identify sufficient employment land to meet the identified need in an appropriate spatial distribution with sufficient flexibility, and is it justified by robust evidence in the latest Employment Land Study [SD82] and other sub-regional employment studies [SD83-86]?
d. Should the SAD update the reference to the proposal for a Strategic Rail Freight Interchange within South Staffordshire?

2.6 Green Belt & Open Countryside (Policy SAD6) - General
a. Is the general approach to the Green Belt and Open Countryside consistent with national policy in the NPPF & PPGs and with the adopted Core Strategy (Policies CP1, GB1 & OC1)?

MATTER 3: SITE SELECTION METHODOLOGY & GREEN BELT REVIEW

Key issue: Is the Site Selection Methodology and the basis for assessing, selecting and rejecting the proposed site allocations effective, objective, comprehensive, transparent, consistent with national policy and justified with robust, proportionate, accurate and up-to-date evidence, including the Green Belt Review?

3.1 Site Selection Methodology
a. Is the Site Selection Methodology consistent with national policy in the NPPF & PPGs [ID:3] and with the policies in the adopted Core Strategy?
b. Is the Site Selection Methodology and basis for assessing, selecting and rejecting sites effective, objective, consistent, comprehensive, transparent and justified with robust, proportionate, accurate and up-to-date evidence, including the factors considered, the weighting given to them in the assessment and the relationship with the Green Belt Review, Landscape Sensitivity Study and the sequential approach to development?
c. Does the Site Selection Methodology take sufficient account of previously developed/brownfield land, windfall sites, sites within the existing development boundaries of settlements and non-Green Belt land?
d. Has the Site Selection Methodology and basis for assessing potential sites considered and addressed the infrastructure implications, including the necessary infrastructure requirements, delivery and viability?
e. Has the Council considered all reasonable and realistic alternative sites and given full reasons for selecting and rejecting potential sites, including sustainability factors?

3.2 Green Belt Review
a. Is the Green Belt Review consistent with national policy in the NPPF & PPGs and with the policies in the adopted Core Strategy?
b. Is the Green Belt Review, its methodology and the basis for assessing, selecting and rejecting sites appropriate, objective, consistent, comprehensive, transparent, and justified with robust, proportionate, accurate and up-to-date evidence, including the factors considered and the weighting given to them?
c. Has the Council considered all reasonable and realistic alternative sites, including non-Green Belt sites, and given full reasons for selecting and rejecting potential sites?
d. Does the SAP clearly identify and demonstrate the exceptional circumstances necessary to justify amending Green Belt boundaries and releasing land from the Green Belt?
MATTER 4: SITE-SPECIFIC MATTERS, INCLUDING PROPOSED SITE ALLOCATIONS (HOUSING, SAFEGUARDED LAND, GREEN BELT, DEVELOPMENT BOUNDARIES, EMPLOYMENT AND GYPSY & TRAVELLER SITES)

Key issue:
Are the proposed site allocations fully justified, suitable and available for the proposed development, sustainable, developable and deliverable within the plan period; where Green Belt boundaries are proposed to be amended to release land for development or Safeguarded Land, have exceptional circumstances been demonstrated; and are the site-specific requirements necessary, effective and justified?

Key questions for each site:

i. Are the reasons for selecting the site soundly based; has the site assessment process identified and addressed all relevant considerations, including, where applicable, impact on the local road network, environment, landscape, historic environment, heritage assets, residential amenity and wildlife, adequacy of infrastructure/services, flood risk, land stability/contamination, proximity to mineral operations, noise and pollution and capacity/size of the site; and is the site suitable, available, justified, sustainable, developable, deliverable, viable and soundly based?

ii. Are the site-specific planning requirements necessary, effective and justified, including, where applicable, pedestrian and vehicular access, landscape, open space, boundary treatment, flood risk, drainage, transport assessment and road/junction improvements, boundary treatment and contributions to education/road improvements?

iii. Where the site is being released from the Green Belt for development or Safeguarded Land, have the exceptional circumstances for releasing the site from the Green Belt been fully demonstrated, and would the release of the site prejudice or conflict with the purposes of including the site within the Green Belt?

HOUSING, SAFEGUARDED LAND & GREEN BELT (POLICIES SAD2, SAD3 & SAD6)

4.1 BILBROOK
   a. Land off Pendeford Mill Lane, Bilbrook (443) (Housing/Green Belt/Development Boundary)
   b/c. Land off Pendeford Mill Lane/Lane Green Road, Bilbrook (443/209) (Safeguarded Land/Green Belt/Development Boundary)

4.2 CODSALL
   a. Land at the former Adult Training Centre, Histons Hill (228) (Housing)
   b. Land at Watery Lane, Codsall (223) (Housing/Development Boundary)
   c. Land at Keepers Lane/Wergs Hall Road, Codsall (406/419) (Housing/Safeguarded Land/Green Belt/Development Boundary)

4.3 BREWOOD
   a/c. Land off Engleton Lane, Brewood (54) (Housing/Green Belt/Development Boundary)
   b. Land off Four Ashes Road, Brewood (055/068) (Safeguarded Land/Green Belt)

4.4 CHESLYN HAY
   a. Land off Saredon Road, Cheslyn Hay (119) (Housing/Safeguarded Land/Green Belt/Development Boundary)
   b. Land off Wolverhampton Road, Cheslyn Hay (119/118) (Safeguarded Land/Green Belt)

4.5 GREAT WYRLEY
   a. Land at 154a Walsall Road, Great Wyrley (141) (Housing)
   b. Land at Pool View, Churchbridge (139) (Housing/Green Belt/Development Boundary)
   c. Land at Landywood Lane, Great Wyrley (136) (Housing/Safeguarded Land/Green Belt/Development Boundary)
4.6 COVEN
a. Land west of School Lane, Coven (086) (Housing/Green Belt/Development Boundary)
b. Land east of School Lane, Coven (082) (Safeguarded Land/Green Belt)

4.7 ESSINGTON
a. Land at Hobnock Road, Essington (153) (Safeguarded Land)
b. Land at Elmwood Avenue, Essington (152) (Development Boundary)

4.8 FEATHERSTONE
a. Land at Brinsford Lodge, Featherstone (168) (Housing/Green Belt/Development Boundary)
b. Land adjacent to Brinsford Lodge, Featherstone (397) (Safeguarded Land/Green Belt/Development Boundary)

4.9 GOSPEL END/BAGGERIDGE
a. Land at the former Baggeridge Brickworks (Green Belt/Development Boundary)

4.10 HUNTINGTON
a. Land at Pear Tree Farm, Huntington (016) (Safeguarded Land/Green Belt)
b. Land at the former Littleton Colliery, Huntington (Green Belt/Development Boundary)

4.11 KINVER
a. Land off Hyde Lane (east), Kinver (270) (Housing/Green Belt/Development Boundary)
b. Land south of White Hill (274) (Housing/Safeguarded Land/Green Belt/Development Boundary)

4.12 PATTINGHAM
a. Land at Hall End Lane, Pattingham (251) (Safeguarded Land/Green Belt)

4.13 PENKRIDGE
a. Land at Cherrybrook Drive, Penkridge (005) (Safeguarded Land)

4.14 PERTON
a. Land west of Wrottesley Park Road (south), Perton (239) (Housing/Safeguarded Land/Green Belt/Development Boundary)

4.15 SWINDON
a. Land off Himley Lane (north), Swindon (313) (Housing/Safeguarded Land/Green Belt/Development Boundary)

4.16 WHEATON ASTON
a. Land east of Ivetsey Road, Wheaton Aston (379) (Housing/Green Belt/Development Boundary/Open Countryside)

4.17 WOMBOURNE
a. Land off Ounsdale Road, Wombourne (281a) (Housing)
b. Land north of Beggars Bush Lane, Wombourne (302) (Housing/Green Belt/Development Boundary)
c. Land north of Bridgnorth Road, Wombourne (283) (Housing/Green Belt/Development Boundary)
d. Land off Orton Lane, Wombourne (416) (Safeguarded Land/Green Belt)
e. Land north of Poolhouse Road, Wombourne (285/459/415) (Safeguarded Land/Green Belt)
4.18 **EMPLOYMENT SITE ALLOCATIONS (POLICY SAD5)**

a. **Land west of i54, South Staffordshire** (Employment/Green Belt/Development Boundary)
   i. Are the reasons for allocating this proposed extension fully justified with robust evidence, including demonstrating the exceptional circumstances for releasing the land from the Green Belt and the need for the development; is the proposed site suitable, available, sustainable, viable, developable and deliverable within the plan period; and should further land be allocated or safeguarded to meet future employment needs?
   ii. Does the proposal address all relevant considerations, including impact on the local road network, environment, landscape, residential amenity and wildlife, adequacy of infrastructure/services and flood risk?
   iii. Are the site-specific development requirements necessary, effective and justified, including flood risk assessment, Environmental Impact Assessment and Transport Assessment, mitigation measures and restriction to Class B1 & B2 uses?

b. **Land east and west of ROF Featherstone** (Employment/Green Belt/Development Boundary)
   i. Are the reasons for allocating this proposed extension fully justified with robust evidence, including demonstrating the exceptional circumstances for releasing the land from the Green Belt and the need for the development; is the proposed site suitable, available, sustainable, viable, developable and deliverable within the plan period; and should further land be allocated or safeguarded to meet future employment needs?
   ii. Does the proposal address all relevant considerations, including impact on the local road network, environment, landscape, residential amenity and wildlife, adequacy of infrastructure/services and flood risk?
   iii. Are the site-specific development requirements necessary, effective and justified, including flood risk assessment, Environmental Impact Assessment and Transport Assessment, mitigation measures and restriction to Class B1 & B2 uses?
   iv. Are the proposed new road access arrangements appropriate, fully justified, effective, viable and deliverable within the plan period, including the impact on heritage assets and surrounding Green Belt and appropriate mitigation measures?

c. **Protected Employment Sites (paragraph 9.4)**
   i. Are the reasons for selecting these existing employment sites for protection as employment land under Core Strategy Policy EV1 fully justified, sustainable, effective and viable?

4.19 **GYPSY & TRAVELLER SITES (POLICY SAD4)**

Key questions for each site:

i. Are the reasons for selecting the site soundly based, and is the proposal appropriate, suitable, available, justified, sustainable, developable, deliverable, viable and soundly based?
ii. Have the very special circumstances for allocating this Green Belt land as a gypsy and traveller site been fully demonstrated?
iii. Has the SAD addressed all the relevant considerations, planning requirements and site-specific issues?

GT02. High House, Hatherton  
GT03. New Stables, Poplar Lane, Hatherton  
GT05. Granary Cottage, Slade Heath  
GT06. The Spinney, Slade Heath  
GT07. The Bungalow, Rock Bank  
GT08. Brinsford Bridge, Coven Heath  
GT13. Hospital Lane, Cheslyn Hay  
GT14. Brickyard Cottage, Essington  
GT17. The Stables, Old Landywood Lane  
GT18. Pool House Road, Wombourne  
GT20. Ball Lane, Horden Lodge, Coven Heath  
GT23. Glenside, Dark Lane, Slade Heath
MATTER 5: OTHER POLICIES & DEVELOPMENT REQUIREMENTS
(Policies SAD7-SAD9)

Key issue:
Are the proposed open space standards and key development requirements fully justified, appropriate, effective, deliverable, viable and soundly based, and do they properly address site and infrastructure requirements, mitigation measures and environmental, traffic and other considerations, in accordance with national policy and the policies in the adopted Core Strategy?

5.1 Open Space Standards (Policy SAD7)
   i. Is the general approach to the provision of open space consistent with national policy in the NPPF & PPGs and with the adopted Core Strategy (Policy CP14)?
   ii. Are the open space standards appropriate, fully justified, viable, deliverable and reasonable, or are they too onerous and inflexible for developers?
   iii. Should allotments form part of the proposed open space provision and should the Woodlands Access Standards be referred to?

5.2 Hatherton Canal Restoration (Policy SAD8)
   i. Is the general approach to the restoration of the Hatherton Canal consistent with the adopted Core Strategy (Policy EV3) and with the latest proposals to protect the route and restore the canal?

5.3 Key Development Requirements (Policy SAD9)
   i. Are the Key Development Requirements, including Design & Access, Highways (including Transport Assessment), Housing Mix (including affordable housing, specialist housing for the elderly and self-build plots), Historic Environment, Open Space, Green Infrastructure, Sustainable Urban Drainage Systems, Natural Environment & Resources, Mineral Resources and Land Stability, consistent with the latest national policy in the NPPF & PPGs and with the policies in the adopted Core Strategy?
   ii. Are the Key Development Requirements appropriate, fully justified, proportionate, deliverable, up-to-date and soundly based, or are they unduly onerous, restrictive and inflexible for developers? Is the latest assessment of viability [SD089] comprehensive and soundly based?

MATTER 6: OTHER MATTERS

6.1 Further Proposed Changes/Main Modifications to the submitted Plan
6.2 Other matters/issues not yet specified

SJP/AW v.1a 09.10.17