Planning and Compulsory Purchase Act 2004
(as amended)

Section 20

Report on the Examination of the
South Staffordshire Local Plan
Site Allocations Document

The Plan was submitted for examination on 15 September 2017

The examination hearings took place between 28 November – 8 December 2017

File Ref: PINS/C3430/429/4
Abbreviations used in this report

AM Additional Modification
AONB Area of Outstanding Natural Beauty
BCLEP Black Country Local Enterprise Partnership
DEFRA Department for Environment, Food & Rural Affairs
DPD Development Plan Document
DfT Department for Transport
DtC Duty to Co-operate
dw/yr dwellings per year
EA Environment Agency
EIA Environmental Impact Assessment
ELS Employment Land Study
GBHMA Greater Birmingham Housing Market Area
GBR Green Belt Review
GBSLEP Greater Birmingham & Solihull LEP
GTAA Gypsy & Traveller Accommodation Assessment
HA Highway Authority
ha hectares
HMA Housing Market Area
HRA Habitats Regulations Assessment
IDP Infrastructure Delivery Plan
JLR Jaguar Land Rover
LEP Local Enterprise Partnership
LDS Local Development Scheme
LSV Local Service Village
MM Main Modification
MOA/MOU Memorandum of Agreement/Understanding
MSV Main Service Village
NE Natural England
NPPF National Planning Policy Framework
¶/para paragraph
PPG Planning Practice Guidance
PPTS Planning Policy for Traveller Sites
SA Sustainability Appraisal
SAC Special Area of Conservation
SAD South Staffordshire Local Plan Site Allocations Document
SAMM Strategic Access & Management Measures
SCC Staffordshire County Council
SCI Statement of Community Involvement
SEA Strategic Environmental Assessment
SEP Strategic Economic Plan
SHLAA Strategic Housing Land Availability Assessment
SHMA Strategic Housing Market Assessment
SOCG Statement of Common Ground
SPA Special Protection Area
S&SLEP Stoke-on-Trent & Staffordshire Local Enterprise Partnership
SSC South Staffordshire Council
SSCS South Staffordshire Local Plan Core Strategy DPD
SSLP South Staffordshire Local Plan (1996)
SuDS Sustainable Drainage Systems
WCC Wolverhampton City Council
WCML West Coast Main Line
WMCA West Midlands Combined Authority
Non-Technical Summary

This report concludes that the South Staffordshire Local Plan Site Allocations Document provides an appropriate basis for planning in the district to 2028 providing a number of Main Modifications are made to the plan. South Staffordshire Council has specifically requested me to recommend any Main Modifications necessary to enable the plan to be adopted. All the Main Modifications to address this were proposed by the Council and were subject to public consultation over a 6-week period. In two cases, I have amended the detailed wording, where necessary. I have recommended the Main Modifications after considering all the representations made in response to consultation on them.

The Main Modifications can be summarised as follows:

- Amend and clarify the timetable and scope of the Local Plan review proposed under Policy SAD1;
- Amend Policy SAD2 to refer to the need for any other mitigation which is found necessary;
- Amend Policy SAD4 to refer to the need to deliver any necessary site-specific mitigation relating to the historic environment;
- Amend Policy SAD5 to clarify and update the development requirements for the proposed extensions to Strategic Employment Sites at i54 South Staffordshire and ROF Featherstone;
- Clarify the range of key development requirements set out in Policy SAD9, including the impact on heritage assets, mitigation, SuDS and education contributions;
- Amend, clarify and update the planning considerations and development requirements for the proposed allocations in the individual site-specific pro-formas in Appendix 1.
Introduction

1. This report contains my assessment of the South Staffordshire Local Plan Site Allocations Document (SAD) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It first considers whether the preparation of the Plan has complied with the legal and procedural requirements, including the Duty to Co-operate, and then considers whether the Plan is sound. The National Planning Policy Framework (NPPF) makes it clear that in order to be sound, a local plan should be positively prepared, justified, effective and consistent with national policy (NPPF; ¶ 182).

2. The starting point for the Examination is the assumption that South Staffordshire Council (SSC) has submitted what it considers to be a sound plan. The basis for the examination is the South Staffordshire Local Plan Site Allocations Document Publication Plan Submission Draft (January 2017) [SD1]. This incorporates some amendments as set out in the Schedule of Proposed Minor Modifications [SD4]; some of these introduce new requirements in some of the policies and site profiles and are needed to ensure the Plan is sound. These amendments were therefore included in the Schedule of Main Modifications and subject to public consultation.

3. My approach to the Examination has been to work with SSC and other participants in a positive, pragmatic and supportive manner. In so doing, I have considered all the points made in the representations and statements. However, the purpose of this report is to consider the legal compliance and soundness of the Plan, giving reasons for the recommended modifications, rather than responding to every point made in the representations and statements. References to documentary sources are provided thus [ ].

Main Modifications

4. In accordance with Section 20(7C) of the 2004 Act, SSC has requested me to recommend any modifications needed to rectify matters that make the Plan unsound or not legally compliant, and thus incapable of being adopted. My report explains why the recommended Main Modifications are necessary to make the SAD sound and legally compliant; all of these relate to matters and issues raised during the examination. The Main Modifications are referenced in bold in the report [MM] and are set out in the accompanying Appendix.

5. Following the examination hearings, SSC produced a schedule of Proposed Main Modifications, including an updated sustainability appraisal. These were subject to public consultation between 7 February – 21 March 2018 [PS.G.001/003], and I have taken account of the consultation responses in coming to my conclusions. In the light of the representations made and as requested by SSC, I have made some minor amendments to the wording of two of the Main Modifications, where these are necessary for clarity, accuracy or consistency; these are highlighted in my report. None of these amendments significantly alters the content of the published Main Modifications or undermines the participatory processes and sustainability appraisal undertaken.

Policies Map

6. SSC should maintain an adopted Policies Map which illustrates the geographical application of the policies in the adopted development plan. When submitting a local plan for examination, SSC should provide a submission Policies Map showing the changes to the adopted Policies Map arising from proposals in the submitted local plan. However, the Policies Map is not defined in statute as a DPD, and so I
do not have the power to recommend main modifications to it. SSC has submitted a Policies Map which identifies the locations of the proposed site allocations and development/Green Belt/policy boundaries [SD9]. No further changes to the Policies Map are needed as a result of the Main Modifications now recommended.

**Assessment of Legal Compliance**

7. SSC has submitted its own self-assessment of the legal compliance of the SAD [SD17]. I summarise my assessment of these legal aspects of compliance in the table below, but before then, I need to deal with several legal and procedural matters raised during the course of the examination.

*Public consultation*

8. Several local residents and Parish Councils were concerned about the degree and transparency of engagement and consultation undertaken by SSC during the course of preparing the SAD. This was largely because some of the sites selected at Preferred Options stage were replaced by others proposed at Publication Stage, including at Swindon and Pattingham. I understand that the main reasons for amending some of the site allocations resulted from representations received at Preferred Options stage, raising doubts about the availability and deliverability of certain sites. Although local residents may have been uncertain about the status of some of these sites, it is clear that adequate engagement and consultation has taken place at all relevant stages during the preparation of the plan. Some local residents were concerned that SSC had not properly considered all points in their representations and had not placed all the material on the web-site, but SSC has confirmed that all matters raised in every representation throughout the Plan's preparation were carefully considered.

9. During the course of preparation, the SAD has been subject to at least five rounds of public consultation, including at Publication stage, where two 6-week periods of consultation were undertaken. SSC has also responded to all the representations made during the course of preparing the SAD [SD2a-b; SD3a; SD28a-e; SD43a-c]. In these circumstances, there can be no doubt that adequate public consultation has taken place, fully meeting the requirements in national legislation and in SSC’s Statement of Community Involvement.

*Sustainability Appraisal*

10. Most representors are content with the approach, methodology and content of the Sustainability Appraisal (SA) work, but some were concerned about how particular sites were assessed and whether reasonable alternatives and the cumulative impact of proposals have been properly considered. I deal with the assessment and selection of specific sites later in my report, but it is clear that a wide range of reasonable alternative sites and spatial options have been considered during the course of preparing the SAD, with over 180 potential sites subject to assessment and consultation. The SA work has influenced the preparation of the SAD, and the required mitigation measures identified have been incorporated into the policies and site profiles in the SAD, either at Publication or Main Modification stages. SSC has also explained how cumulative impact was assessed [PS.E.1.008] and, at my request, undertook some further work to assess the combined impact of housing, Safeguarded Land, employment and road proposals at Featherstone [PS.E.1.008.2], which has been incorporated into the SA work.
11. Consequently, I conclude that the SA work has fully met the requirements of the Strategic Environmental Assessment (SEA) Directive & Regulations and guidance in the PPG [ID-28], particularly in respect of considering significant effects, cumulative impact and reasonable alternatives, in a full and proportionate manner.

Purpose and scope of the Site Allocations Document and progression to adoption

12. In order to assess whether the SAD is sound, I need to establish its purpose and scope, particularly since some representors consider the Plan should be abandoned in favour of a complete review of the adopted South Staffordshire Local Plan Core Strategy (SSCS). This concern is largely based on the fact that the SSCS was adopted over five years ago and was based on outdated housing requirements set out in the former (and now revoked) West Midlands Regional Strategy, which did not represent an objective assessment of housing needs for the district. Some also contend that the amount of housing and employment development proposed in the SAD should be substantially increased to address more recent assessments of housing and employment needs, including emerging shortfalls within the wider Housing and Functional Economic Areas.

13. SSC confirms that the purpose of the SAD is to deliver the requirements of the adopted SSCS in a manner consistent with the development strategy, strategic policies, settlement hierarchy and spatial distribution set out in Core Policies 1, 6, 7 & 8 and Policies GB2 & H6; this includes provision for housing, employment, Safeguarded Land and Gypsies & Travellers up to 2028. The SAD does not seek to review or update these SSCS policies, as SSC considers this would be dealt with more appropriately as part of the Local Plan review proposed in SAD Policy SAD1. I am also aware of several legal judgements\(^1\) which confirm that a Site Allocations Plan does not need to reconsider the overall housing provision figure established in an earlier Core Strategy or rectify any shortcomings in its approach to housing land supply and provision, provided that its scope is limited to allocating sufficient sites to fully meet the need established in that Plan. The Local Planning Regulations [8(4) & (5)] also require local plan policies to be consistent with the adopted development plan, unless they specify that an existing policy is to be superseded.

14. In this case, I consider the most expedient way of implementing the requirements of the SSCS is to progress the SAD to adoption. If the SAD were to be abandoned or withdrawn at this late stage, policy restrictions associated with the Green Belt designation of nearly 80% of the district would restrict the provision of further housing and employment land, preventing housing and employment growth and delaying economic benefits. Apart from existing commitments, it would lead to a virtual embargo on further development in the district in the short term. Adjoining local authorities also support progressing the SAD to adoption to provide a sound platform to bring forward an appropriate supply of land for new housing and employment development to complement the regeneration of the Black Country.

15. Some representors consider that the SAD should increase the amount of housing and employment provision substantially above the level established in the SSCS. However, this would not only be inconsistent with that plan, but the HRA & SA work [SD10-11; SD100] also points to potential significant adverse effects in terms of sustainability and environmental factors, impact on local character and amenity, and service provision and infrastructure issues of increased development.

\(^1\) Cooper Estates v Tunbridge Wells BC [2017; EWHC 224 (Admin)]; Oxted Residential Ltd v Tandridge DC [2016; EWCA Civ 414]; Gladman Development Ltd v Wokingham BC [2014; EWHC 2320 (Admin)]
16. It therefore seems to me that progressing the SAD to adoption, if found sound, would offer a timely and robust approach to allocating housing and employment sites, along with Safeguarded Land and gypsies and travellers’ accommodation, which would otherwise be unable to be delivered much before 2022. It would also provide certainty and a plan-led approach to future development, with a clear commitment to an early and comprehensive review of the Local Plan, set out in Policy SAD1. This would enable the emerging shortfalls of housing and employment land in the wider Housing and Functional Economic Markets to be addressed in a timely manner when the scale and spatial distribution has been established by a robust evidence base and cross-boundary agreements.

17. As regards the remaining legal requirements, the summary below covers my assessment of the legal compliance of the SAD and confirms that it meets all the relevant requirements.

**LEGAL REQUIREMENTS**

<table>
<thead>
<tr>
<th>Local Development Scheme (LDS)</th>
<th>The SAD is identified in the latest approved LDS (August 2017) [SD15], and its role and content comply with the LDS. The submission, examination and adoption of the Plan is in line with the proposed timetable, including the need to consult on Main Modifications.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Statement of Community Involvement (SCI) and Regulations</td>
<td>The latest SCI was adopted in April 2014 [SD14]. The plan-making and consultation processes have met the minimum requirements of the Local Planning Regulations and SSC’s adopted SCI, including consultation on Main Modifications.</td>
</tr>
<tr>
<td>Sustainability Appraisal (SA)</td>
<td>Adequate SA has been carried out at all stages during the preparation of the SAD, including at Issues &amp; Options, Preferred Options, Publication Draft and Main Modifications stages [SD54-56/SD62/SD67/SD39/SD48/SD10/SD100;PS.G.003]. The Publication Draft was supported by a full SA, which also considered reasonable alternatives, including spatial options, alternative sites and cumulative impact, and the outstanding mitigation measures highlighted in the SA have been addressed in the Main Modifications to the SAD.</td>
</tr>
<tr>
<td>Habitats Regulations Assessment (HRA)</td>
<td>The submitted SAD is accompanied by an adequate Habitats Regulations Assessment [SD11], along with HRAs for the Issues &amp; Options and Preferred Options stages [SD49/SD57/SD61/SD66/SD40/SD25]. The latest HRA has fully considered the impact of proposals on the Cannock Chase Special Area of Conservation, and there are no outstanding issues.</td>
</tr>
<tr>
<td>Climate change</td>
<td>The SAD refers to policies in the adopted SSCS, which are designed to ensure that the development and use of land within the district will contribute to the mitigation of, and adaptation to, climate change. It also sets out specific planning and development requirements necessary for each site allocation to achieve this statutory objective.</td>
</tr>
<tr>
<td>National Policy</td>
<td>The SAD is consistent with national policy, except where indicated and Main Modifications are recommended.</td>
</tr>
<tr>
<td>2004 Act (as amended) and 2012 Regulations</td>
<td>The SAD complies with the relevant legal requirements, including the 2004 Act (as amended) and the 2012 Local Planning Regulations.</td>
</tr>
<tr>
<td>Public Sector Equality Duty</td>
<td>The SAD is consistent with the NPPF in providing for the needs of all sections of the community, including people with disabilities and gypsies and travellers, and I have had regard</td>
</tr>
</tbody>
</table>
Assessment of Duty to Co-operate

18. Section 20(5)(c) of the 2004 Act requires me to consider whether SSC has complied with any duty imposed by s33A of the Act in relation to preparing the Plan. This requires SSC to co-operate in maximising the effectiveness of plan-making, and to engage constructively, actively and on an on-going basis with neighbouring planning authorities and prescribed bodies when preparing development plan documents with regard to a strategic matter. This is defined as sustainable development or use of land which has or would have a significant impact on at least two planning areas, including sustainable development or use of land for strategic infrastructure. This Duty (DtC) is closely related to the requirements and soundness tests in the NPPF (¶ 156; 178-182), which require plans to be positively prepared and effective.

19. The need to engage and co-operate with neighbouring bodies around South Staffordshire is particularly complex, with at least 12 other local authorities and over 15 prescribed and other bodies involved in the process. There is an established approach to strategic co-operation and joint working within the West Midlands region and across and around the Greater Birmingham conurbation for both officers and elected members. This helps to co-ordinate strategic planning across the region, both from the earlier days of the Regional Spatial Strategy and as established more recently as a result of emerging issues about shortfalls in housing and employment land provision within the conurbation.

20. SSC has submitted evidence outlining how it has engaged constructively, actively and on an on-going basis with neighbouring authorities and prescribed bodies during the preparation of the SAD [SD13; PC.D.1.001]. This sets out the strategic context and identifies the strategic priorities and cross-boundary issues that need to be addressed. These include cross-boundary issues highlighted in the SSCS, such as the Green Belt. Agreement was reached with other local authorities about the terms of reference and approach of the review of the Green Belt undertaken for the SAD. The need for a further cross-authority strategic Green Belt review is also highlighted, to support the reviews of the local plans for South Staffordshire and the Black Country.

21. SSC has considered strategic cross-boundary housing provision as part of the DtC, recognising that the level of provision established in the SSCS is somewhat outdated, being derived from housing figures in the now-revoked Regional Strategy. Moreover, since the adoption of the SSCS, significant cross-boundary issues have arisen with regard to unmet housing need across the West Midlands, particularly from the Greater Birmingham Housing Market Area (GBHMA), including the Black Country. The emerging shortfall in housing provision from these areas includes some 37,900 homes from Birmingham and almost 22,000 homes from the Black Country. A Strategic Growth Study has now been published for the GBHMA [PS.F.012.1-3], which examines strategic options and areas of search for meeting these unmet needs. However, these options and areas of search have not yet been considered in detail, and final decisions about the location and amount of new housing to be apportioned to the various local authorities have not yet been made; these will be set out in an agreed Memorandum of Understanding (MOU), but the timetable has yet to be agreed.
22. Joint work has also been undertaken with the Black Country authorities to update the Strategic Housing Market Assessment and establish an objective assessment of housing needs for both areas [SD80]. The review of the Local Plan proposed under Policy SAD1 will enable these matters to be addressed in a timely manner, as well as addressing the emerging shortfalls from the wider GBHMA.

23. Employment is an important strategic cross-boundary issue, not only due to the numbers of residents from the district commuting to Birmingham and the Black Country for employment, but also because of the economic importance of strategic employment sites in South Staffordshire to the economy of the wider sub-region, particularly i54, Hilton Cross, Four Ashes and ROF Featherstone. More recent economic and employment studies [SD82-86; PS.E.1.003] confirm the sub-regional significance of these sites, as well as the need to meet some of the unmet need for high-quality employment sites from the Black Country in South Staffordshire, as well as the potential for Regional Logistics Sites. SSC has also engaged and co-operated with the Stoke-on-Trent & Staffordshire Local Enterprise Partnership (S&SLEP), along with other adjoining LEPs, including the Black Country (BCLEP) and Greater Birmingham (GBSLEP).

24. The cross-boundary implications of proposed development in the SAD on the wider highway and transport network are a strategic priority, with both Highways England and Staffordshire County Council (SCC) as Highway Authority being closely and actively involved with proposals to improve the Strategic Road Network (including a proposed M54/M6/M6T link road) and studies to assess the impact of developments proposed in the SAD on the wider road network.

25. Joint work has taken place to establish Gypsy & Traveller needs, recognising the cross-boundary implications of such provision, including a recent joint assessment of need [PS.E.3.001] which will be addressed in the review of the Local Plan. SSC has engaged with service and infrastructure providers, including water, education and health bodies, which have informed the Infrastructure Delivery Plan (IDP) [SD12]. Joint work and co-operation has been undertaken with the Cannock Chase SAC Partnership and relevant local authorities about the Cannock Chase Area of Outstanding Beauty (AONB) and SAC, particularly in terms of visitor surveys, Strategic Access & Management Measures (SAMM) and the impact of proposed development, in line with the current Memorandum of Agreement (MOA). The DtC work also recognises cross-boundary links with open space, sport and recreation, the Forest of Mercia, Hatherton Canal restoration, waste and minerals.

26. Issues raised by other local authorities and prescribed bodies during earlier stages of consultation on the SAD have been addressed, and there are no unresolved issues raised by these bodies that relate to the DtC requirements. Although some prescribed bodies (such as Highways England, Historic England and the Environment Agency) seek some amendments and additional work to the SAD, these relate to soundness issues, rather than DtC requirements; where necessary, they are addressed in the modifications recommended later in my report.

27. Consequently, having considered all the evidence, I conclude that SSC has engaged constructively, positively, actively and on an on-going basis with adjoining local authorities and prescribed bodies during the preparation of the SAD. The legal requirements of the Duty to Co-operate have therefore been met.
Assessment of Soundness

Preamble

28. The South Staffordshire Local Plan comprises the Core Strategy (SSCS), adopted in December 2012, and the Site Allocations Document (SAD). The SSCS sets out strategic policies for development in the district, and establishes the strategic planning policy framework for development. This includes the strategic vision and objectives for the district, along with the levels and broad locations of development, but does not identify or allocate specific sites for development. It is also relevant to note that the SSCS was adopted after the publication of the NPPF.

29. The purpose of the SAD is to deliver the strategy and development requirements established in the SSCS. Preparation began with consultation on Issues & Options and the Preferred Approach (2014-2016), concluding with consultation on the Publication Draft in 2017. It is accompanied by an extensive evidence base, including Sustainability Appraisal, Habitats Regulations Assessment, Green Belt Review, Landscape Sensitivity and Historic Environment assessments, updated Strategic Housing Market and Housing Land Availability Assessments and Employment Land studies (including joint studies with the adjoining Black Country authorities), Strategic Flood Risk Assessment, highways and transport work, site-selection methodology and site appraisals, Viability and Open Space studies, along with site-specific evidence such as that produced for the ROF Featherstone site.

30. SSC has undertaken its own self-assessment of the soundness of the SAD [SD16]. In considering the soundness of the SAD, I have not only had regard to the NPPF and relevant Planning Practice Guidance (PPG), but also taken account of more recent Government and Ministerial statements about planning and plan-making.

Main Issues

31. Taking account of the representations, supporting evidence, written statements, discussions and points raised during the examination, there are four key issues upon which the soundness of the SAD depends.

MATTER 1 – LOCAL PLAN STRATEGY & STRATEGIC POLICIES

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?

32. Sections 6-10 of the SAD set out the Local Plan Strategy for South Staffordshire, including a review of the Local Plan, providing specific sites to meet the housing, employment land, Safeguarded Land and Gypsy & Traveller accommodation requirements of the SSCS, along with associated Green Belt, Open Countryside and Development Boundary amendments.

Local Plan Review

33. As submitted, Policy SAD1 provides a firm policy commitment to an early review of the overall Local Plan, to address the evidence of unmet housing needs across the GBHMA, including the role that Safeguarded Land can play in the allocation of new homes, working positively under the DtC towards a MOU with all GBHMA local authorities. Pre-hearing amendments to the policy set a deadline for completion of the review by 2022 and added a commitment to review employment needs.
34. Neighbouring local authorities and many representors support the need for an early review of the Local Plan, some pressing for an immediate review, with submission by the beginning of 2020; this would reflect Policy TP48 of the Birmingham Development Plan (BDP). Some consider it should also cover elements other than housing, such as employment and gypsies and travellers.

35. I have already concluded that an early and comprehensive review of the Local Plan would enable the emerging shortfalls of housing and employment land in the wider Housing and Functional Economic Markets to be addressed in a timely manner when the scale and spatial distribution has been established by a robust evidence base and cross-boundary agreements. National policy [PPG: ID:12-008] advises that local plans should reviewed within 5 years of adoption, but in this case, the need for review is more pressing, due to the need to address the issue of unmet housing need in the GBHMA. SSC acknowledges that the SAD is effectively an interim plan, seeking to deliver the outstanding development requirements of the adopted SSCS. In fact, SSC has already begun to review the local plan, with evidence being commissioned on housing need and land availability, along with a call for sites; a commitment to having a new Local Plan in place within 5 years of adopting the SAD is also included in the LDS. By ensuring that the Local Plan is up-to-date and effectively addresses known issues and needs, the principle of an early review is consistent with national policy and soundly based.

36. As regards the timescale, undertaking a comprehensive review of the Local Plan is not something that can be carried out quickly, particularly given the need to establish new baseline figures for housing and employment land for an extended period to 2036 and make the necessary site allocations, along with the associated consultation and engagement with stakeholders and other local authorities. Furthermore, the level of future housing and employment provision cannot finally be established until decisions on the spatial distribution of unmet housing needs from the GBHMA have been agreed. SSC has reviewed the timetable for the review and proposes amendments to commit to submitting the Local Plan review to the Secretary of State by the end of 2021 [MM01-02].

37. This timescale is ambitious and challenging, but even though it is beyond that envisaged in the BDP and slightly later than other more-advanced plans in the GBHMA, it would allow for outstanding work and agreements on meeting the unmet housing needs from the GBHMA to be completed, including Birmingham and the Black Country authorities; several authorities are also preparing to submit plans beyond the BDP deadline and some have not indicated the timescales for reviewing their plans. It should also give sufficient time to review the other aspects of the Local Plan, recognising the resources available, and carry out the necessary consultation and engagement with stakeholders and neighbouring local authorities. There is also a contingency clause, committing SSC to providing a proportionate contribution to unmet cross-boundary development needs if the GBHMA authorities cannot agree the apportionment of housing growth across the HMA. To specify that SSC may make a greater contribution to the GBHMA shortfall would pre-judge the assessment of potential capacity and the associated evidence.

38. As regards the scope of the review, it is clear from the evidence and discussions during the examination that the review will cover matters other than housing and employment needs and land supply. SSC has now set out the range of matters that will be subject to review, including: the district’s own housing needs and potential land supply; the role of those supply options in meeting some of the unmet housing needs from the GBHMA, including the associated site allocations; employment land needs, not only for this district, but also the potential to meet
wider unmet employment needs from adjoining areas; the existing settlement hierarchy and strategic distribution of housing and employment growth; the need for additional Safeguarded Land for future housing and employment use; Gypsy & Traveller provision; and a comprehensive Green Belt review, undertaken jointly with the Black Country authorities. The nature and extent of this work is both challenging and comprehensive, and will need to be tightly managed if the deadline to complete the review is to be met. The proposed amendments to the policy and accompanying text [MM01-02] adequately specify and clarify the work to be undertaken and provide a sound basis for the Local Plan review. With these recommended modifications, I consider the approach to the Local Plan review is justified, positively prepared, achievable, effective and soundly based.

**Housing Provision**

39. SSCS Core Policies 1 & 6 seek to deliver at least 3,850 new homes between 2006-2028 at a rate of 175 dw/year, and set minimum housing numbers for 5 areas and 15 settlements at a ratio of 90/10 at the Main & Local Service Villages (MSVs/LSVs). It also seeks to maintain a 5-year housing supply, plus an additional buffer of 5%. Taking into account completions and commitments between 2006-2010, a balance of 1,610 new homes is needed between 2010-2028. Updating the completions and commitments to the end of 2015, the SAD seeks to provide 1,012 new homes between 2016-2028. Further explanation is provided in the supporting evidence [SD30; SD79-80; SD98; SD102; PS.D.1.002.1-3; PS.E1.011]. Policy SAD2 lists the proposed housing sites and confirms that they will be delivered in line with the site-specific planning requirements. This would deliver the housing strategy and overall amount and spatial distribution of housing proposed in the SSCS, and fully meet its specific housing requirements. I deal with site-specific issues relating to these allocations later in my report.

40. However, there are some outstanding concerns relating to this approach. Firstly, the level of housing provision set out in the SSCS is outdated, being derived from the housing figures in the former Regional Strategy, which did not establish a full objective assessment of housing need for this district. Moreover, since the adoption of the SSCS, more recent assessments of housing need for this district and the adjoining Black Country have been published, pointing to a significant increase in South Staffordshire’s housing need of 270 dw/year [SD80; SD102]. Using the latest “standard” method of calculating housing need set out in the 2017 Housing White Paper, the adjusted figure would be slightly lower at 245 dw/year.

41. Furthermore, since the adoption of the SSCS, significant cross-boundary issues have arisen in terms of unmet housing need across the West Midlands, particularly from the GBHMA, including Birmingham and the Black Country. This points to an identified shortfall in housing provision of some 37,900 homes from Birmingham and an emerging shortfall of almost 22,000 homes from the Black Country area. A Strategic Growth Study has now been published for the GBHMA, which examines strategic options and areas of search for meeting these unmet needs [PS.F.012.1-3]. However, the implications of this study in terms of spatial options for development have not yet been fully considered and no decisions have been made about the final spatial distribution of development across the various authorities.

42. I have previously concluded that it is not the role of the SAD to review or revise the overall housing requirement figure established in the SSCS; its main purpose is to implement and deliver the amount and spatial distribution of new housing envisaged in the SSCS. The most appropriate manner to address the issues of housing need, including updated housing needs for this district and the unmet
housing needs from the wider GBHMA, including Birmingham and the Black Country, is through the review of the Local Plan proposed under Policy SAD1. In terms of meeting the unmet housing needs of the GBHMA, final decisions about the level of provision to be apportioned to the various local authorities have not yet been taken; further technical assessment of the suggested options will need to be undertaken before the amount and spatial distribution of new housing in the surrounding authorities can be agreed in a MOU/SOCG. Although the BDP envisages such decisions being made by January 2020, it could be some time before the assessment of the options and implications of meeting the unmet housing needs from the GBHMA have been completed and agreed. This supports my view that these matters would be addressed more appropriately in a timely and effective manner in the review of the Local Plan proposed under Policy SAD1.

43. Furthermore, it is important to recognise the overall situation in terms of housing provision in this district. Taking account of all completions and commitments since 2006, there is already a small surplus of housing provision compared with the overall target of 3,850 new homes set in the SSCS, without any of the new housing allocations proposed in the SAD; the addition of the new allocations would result in the overall target being exceeded by almost 1,000 dwellings. However, some of this existing provision includes sites outside of the main settlement hierarchy. Excluding this element and making other adjustments to the MSVs/LSVs shows that, with completions and commitments since 2010 and new allocations, the SAD would deliver 1,742 new dwellings between 2011-2028. Overall, the SAD would enable 4,773 new homes to be delivered (2006-2028), resulting in a surplus/flexibility of over 20% compared with the SSCS requirement of 3,850 new dwellings [PS.D.1.002.1]. The housing provision proposed in the SAD would also reflect the spatial distribution of housing set out in the SSCS, with an overall 12-14% surplus/flexibility in provision [PS.E.1.007]. Consequently, the SAD would effectively meet the housing requirements of the SSCS and continue to increase housing provision within the district.

44. NPPF (¶ 47) requires local authorities to maintain a 5-year supply of housing land to meet their housing target. Taking account of completions, commitments, a modest and robust allowance for windfalls (30 dw/year), 5% buffer and new allocations, an updated assessment (2017) confirms that a 10.92 years supply (or 6.53 years without the new allocations) can be demonstrated at the rate of 175 dw/year set in the SSCS [PS.E.1.011]. Assessing housing supply against the updated housing need figure (270 dw/year) established in the joint SHMA with the Black Country authorities [SD80] (which SSC now adopts for development management purposes) results in a housing supply of 6.68 years. The updated housing trajectory sets out the anticipated delivery of housing sites and shows a significant boost to past rates of housing supply between 2017-2022 [PS.D.1.002.2-3]. It does show a potential lack of housing sites after 2024, but this can be addressed when the plan is reviewed. Since the SAD is intended to implement the SSCS strategy, there is no justification for any “penalty clause” to bring forward Safeguarded Land sites if a 5-year supply cannot be demonstrated; this approach would conflict with the SSCS strategy and the NPPF.

45. The site selection process has sought to maximise the capacity of each settlement for growth, and ensure that all potential sites within the development boundary, including previously developed, redundant, underused, surplus public and other non-Green Belt land, are thoroughly considered. The resulting spatial distribution set out in Policy SAD2 accords with that envisaged in the SSCS. The SAD also confirms that the capacity of each new housing site is expressed as a minimum,
giving further flexibility, particularly since there is some evidence that eventual housing numbers are often higher than those previously envisaged. Consequently, I can see no compelling case to increase overall housing provision or allocate, release or reserve more housing land to meet current and emerging housing need assessments, particularly since the overall future housing need and land supply, including any provision to help meet the unmet housing needs of the GBHMA, will be reviewed as part of the proposed Local Plan review.

46. In these circumstances, I conclude that the approach to the provision of new housing in the SAD fully meets the requirements of the SSCS, is justified and soundly based and is consistent with national policy. However, there is a need to make some amendments to the wording of Policy SAD2, referring to the need to provide any other mitigation which is found necessary, as required by prescribed bodies, in order for the policy to be effective [MM03]. With this recommended modification, the policy is fully justified and soundly based.

**Employment Provision**

47. The SSCS does not set any specific requirement for additional employment land within the district and confirms that there is sufficient employment land to meet the needs of the district. However, it commits the SAD to reviewing the Employment Land Study (ELS) and confirms that the need for any further employment land will largely be met by developing land within, or as modest extensions to, the four existing freestanding Strategic Employment Sites, provided they are supported by robust evidence and a reasoned justification.

48. The economic circumstances now are rather different to those when the SSCS was prepared and adopted. However, as indicated previously, it is not the role of the SAD to review the overall economic strategy established by the SSCS. Moreover, as part of the preparation of the SAD, the ELS has been refreshed and confirms a small surplus of employment land to meet the district’s needs [SD82]; it also confirms that there is no need to provide employment uses as part of mixed-use developments at the MSVs/LSVs, nor any need to identify Safeguarded Land for future employment development.

49. However, recognising the important sub-regional relationship between South Staffordshire and the Black Country, further studies have identified a need for the district to meet some of the shortfall in high-quality employment land in the Black Country [SD83-86; PS.E.1.003]. The SAD also refers to a proposed Regional Logistics Site/Strategic Rail Freight Terminal, which is currently being promoted at Four Ashes. However, this is a large-scale proposal, defined as a Nationally Significant Infrastructure Project; this will be determined by the Secretary of State, outside the scope of the SAD and SSC’s decision-making responsibilities.

50. Following a review of the Green Belt covering sites around the four strategic employment sites and other site assessment work, Policy SAD5 proposes modest extensions to two of the strategic employment sites in South Staffordshire, including a 40ha extension at i54 South Staffordshire and a further 12ha of employment land at ROF Featherstone; Policy SAD6 covers the associated amendments to the Green Belt and development boundaries. I deal with the site-specific justification and issues relating to these allocations later in my report, including the proposed modifications to the policy and accompanying text.
51. There is considerable support for the employment strategy being promoted by SSC, both from neighbouring Black Country local authorities and from landowners, developers and the local community. The general approach reflects the SSCS (Core Policies 1 & 7 & ¶ 9.4) and is consistent with national policy. By providing additional employment land, it responds to changing economic circumstances in a timely manner and recognises the employment land needs of adjoining areas, as well as providing some flexibility in provision. It is justified by robust evidence, which is up-to-date and conclusive, and demonstrates the exceptional circumstances justifying the amendment to Green Belt boundaries to provide the additional employment land. It also recognises the strategic importance of the proposed employment areas, not only in the context of this district, but also in terms of the sub-regional economy. The need for further employment land in the future, either for this district or to meet the needs of the wider sub-region, will be covered by the Local Plan review proposed in Policy SAD1.

52. There is some concern that further employment land, including Safeguarded Land, has not been allocated at the other strategic employment sites, but this cannot be justified on the basis of current need and available evidence; the SAD would ensure there is sufficient employment land to meet currently identified needs, and there is no compelling need or exceptional circumstances to justify identifying further employment land or Safeguarded Land on Green Belt land at these other locations. However, SSC will consider the need for further employment land as part of the review of the Local Plan. This review will also consider the availability, range and supply of existing employment land at the strategic employment sites and elsewhere, as well as the future needs of the district and adjoining areas, providing further flexibility to respond to changing economic circumstances. It will also ensure that interaction takes place with the relevant bodies, including the S&SLEP, BCLEP, GBSLEP & West Midlands Combined Authority (WMCA).

53. I therefore conclude that the economic and employment land strategy is justified, effective, positively prepared and consistent with the SSCS and national policy. Apart from the recommended modifications to the policy and accompanying text (which I deal with later), no further amendments are needed.

**Safeguarded Land**

54. SSCS Policy GB2 (¶ 6.31) commits the SAD to identifying sufficient Safeguarded Land equivalent to 10-years housing supply in the ratio of 90/10 to the MSVs/LSVs, equating to sufficient land to accommodate 1,750 new dwellings. Policy SAD3 lists the areas of Safeguarded Land which are to be removed from the Green Belt to provide the required amount of land for future development in the longer term beyond the current Plan period. All sites have been subject to the same site-assessment and selection process as the housing and employment sites, and I deal with site-specific issues relating to the identified sites later in my report.

55. SSC has not revised the amount of Safeguarded Land established in the SSCS to ensure that it will be sufficient to meet longer-term needs beyond the current plan period. This is largely due to the current uncertainty about the scale and spatial distribution of meeting the unmet housing needs from the GBHMA, and the fact that the SAD fully meets the requirements of the SSCS in terms of the amount and spatial distribution of Safeguarded Land. SSC accepts that the issues of Safeguarded Land and Green Belt boundaries will need to be considered in the future, to accommodate future development needs and meet some of the unmet housing needs from the wider GBHMA. However, I consider this is more appropriately addressed as part of the review of the overall future housing
requirement for the district and the need for further Safeguarded Land envisaged in the review of the Local Plan proposed under Policy SAD1.

56. However, there are some outstanding issues relating to this approach. Firstly, whether the SAD identifies sufficient Safeguarded Land to accommodate the scale of housing required in the SSCS. As submitted, the overall amount of Safeguarded Land identified would accommodate at least 1,750 dwellings, as required by the SSCS. However, since then, outline planning permission has been granted for new housing on one of the identified areas of Safeguarded Land at Essington, reducing the total amount of such land (86.8ha) by 9ha. Nevertheless, after reviewing average densities of recent greenfield housing developments [SD98], SSC considers the remaining Safeguarded Land could accommodate up to 1,800 new dwellings, thus meeting the SSCS requirements, with some flexibility. The amount and rate of development on Safeguarded Land envisaged in the SSCS is only a minimum level of provision, and could be exceeded, if justified.

57. Several representors argue that further Safeguarded Land should be identified at this stage, either for future employment use, or for release now, or as “reserve” sites. However, I have already concluded that there is no compelling need or exceptional circumstances to justify identifying further Safeguarded Land for employment use, either for this district or from the wider sub-regional economic area. Since the SAD makes more than sufficient provision to meet the housing target established in the SSCS, there is no need to identify further Safeguarded Land to meet currently identified housing requirements, particularly given the current uncertainty about the overall scale and distribution of new housing needed to meet the future housing needs of the district and the wider GBHMA. I also note that the HRA & SA [SD10-11; SD100] indicate that there could be significant adverse effects in terms of sustainability and impact on protected habitats if the scale of development proposed in the district were to be much higher than that envisaged in SSCS Core Policy 6.

58. Furthermore, given the overall adequacy of housing land provision in the SAD, there is no compelling case to identify “reserve” sites or to release identified Safeguarded Land for development (such as that at Penkridge) within the remaining plan period, particularly since SSCS Policy GB2(c) and the NPPF do not envisage such land being developed until it is necessary as a result of a review of the local plan. Some argue that the SAD should identify further Safeguarded Land to accommodate at least 15-years of development beyond the current plan period, and to recognise the increased housing need identified in more recent housing need assessments, but this could compromise the approach, strategy and requirements of the SSCS. Delays in bringing forward allocated sites or a failure to demonstrate a 5-year housing supply in the future could be dealt with on a case-by-case basis in terms of material planning considerations.

59. Consequently, I conclude that the proposed approach to Safeguarded Land, including the amount and spatial distribution, meets the requirements of the SSCS, and is justified, effective, soundly based and consistent with national policy.

Green Belt & Open Countryside

60. Policy SAD6 lists all the locations where boundary amendments are proposed to remove sites from the Green Belt or Open Countryside; it also confirms that Gypsy & Traveller sites are to remain in the Green Belt. This reflects SSCS Policies CP1, GB1 & OC1, which confirm that some land at the MSVs & LSVs will need to be released from the Green Belt and Open Countryside in order to deliver the
proposed development strategy and enable the sustainable growth of these villages. These amendments follow from a partial Green Belt Review (GBR) [SD073/a-074/a] undertaken as part of the site-selection process, including a review of existing Major DevelopedSites in the Green Belt. I deal with issues relating to the GBR under the next matter, and those about specific sites later in my report.

61. The NPPF (¶ 83-85) requires exceptional circumstances to be demonstrated in order to justify amending Green Belt boundaries and releasing land from the Green Belt. However, as drafted, the SAD does not always explicitly demonstrate these exceptional circumstances, but SSC has now set them out clearly, not only on an overall basis, but also for each settlement [PS.B.001; PS.D.1.002]. SSC has fully examined all reasonable non-Green Belt options to accommodate the required scale and distribution of development, but given that over 80% of the district is covered by Green Belt, it is clear that there is insufficient suitable, available, deliverable and viable non-Green Belt land in the district which would provide sustainable patterns of development.

62. For housing, the exceptional circumstances include the need to deliver the number of new dwellings and spatial distribution established by SSCS Core Policies 1 & 6 (including the sequential site-selection approach), following the comprehensive assessment of non-Green Belt land through the Strategic Housing Land Availability Assessment (SHLAA) and the results of the GBR; these confirm the lack of sufficient suitable, available, deliverable and sequentially preferable non-Green Belt sites within the existing development boundaries of settlements. For Safeguarded Land, they also include the need to identify sufficient land to deliver the equivalent of 10-years housing supply beyond the current plan period. For employment, they include the need to meet some of the shortfall of high-quality employment land in the wider sub-region, the scope for modest extensions to the existing strategic employment sites identified in SSCS Core Policy 7, and the lack of other suitable, appropriate, deliverable and sequentially preferable non-Green Belt land within the boundaries of the existing strategic employment sites. For Major Developed Sites in the Green Belt, the extent and nature of redevelopment that has occurred means it is no longer possible or necessary to keep these sites permanently open since they do not perform any of the key Green Belt purposes.

63. Most representors support this approach, recognising the specific circumstances of South Staffordshire, particularly since 80% of the district is covered by Green Belt designation, which is tightly drawn around almost all the existing settlements and strategic employment sites. SSC has fully examined all reasonable non-Green Belt options, including potential sites within the existing development boundaries of the MSVs & LSVs, previously developed, redundant, underused and surplus public land, and has used realistic densities for the proposed allocations. Having considered all the evidence, I conclude that SSC has demonstrated the exceptional circumstances necessary to justify amending Green Belt boundaries and removing sites from the Green Belt in overall terms, and I deal with any specific justification for each settlement/site later in my report.

**Gypsy & Traveller Provision**

64. SSCS Policy H6 sets out the strategic framework for making provision for gypsies, travellers and travelling showpeople, along with the number of pitches needed. Taking account of existing and permitted pitches provided since these needs were identified, the SAD identifies a residual need for 20 residential Gypsy & Traveller pitches [SD29; PS.D.002]. SSC confirms that, in the past, there has been a good level of provision and take-up of such pitches, in line with the SSCS strategy.
65. Policy SAD4 lists the sites where additional Gypsy and Traveller provision is proposed, totalling some 20 pitches on 12 sites; it also confirms that these are existing established sites in remote rural locations on sites washed over by the Green Belt, and that it is not intended to remove them from the Green Belt. All sites will be delivered in line with Policy H6 and other relevant development management policies in the SSCS, but in order for the policy to be effective, it is important to require such sites to deliver any necessary site-specific mitigation relating to the historic environment [MM04].

66. One of the main issues is whether the proposed level of provision is based on an up-to-date and reliable assessment of Gypsy & Traveller needs. The SSCS bases its assessment of need on a 2009 Gypsy & Traveller Accommodation Assessment (GTAA), but since then, there have been later assessments, both in 2014 [SD105] and jointly with the Black Country authorities in 2017 [PS.E.3.001]. These later assessments identify a much higher level of need for Gypsy & Traveller pitches, but they are subject to some criticisms. However, SSC confirms that it is not the purpose of the SAD to review the level of Gypsy & Traveller provision established in the SSCS; this will be reviewed as part of the proposed review of the Local Plan under Policy SAD1.

67. PPTS (¶ 17) confirms that residential Gypsy & Traveller sites are inappropriate in the Green Belt and advises that such sites should be removed from the Green Belt. However, in South Staffordshire, all the existing sites lie within the Green Belt and all additional pitches are proposed at existing established sites, where the test of “very special circumstances” justifying this use has already been met. Moreover, SSCS Policy H6 does not envisage or require such sites to be removed from the Green Belt. The need to provide additional pitches established by SSCS Policy H6, the presence of existing Gypsy & Traveller provision on these sites, the site-selection process, including the GBR, and the needs of existing local Gypsy & Traveller families provide further justification for the proposed allocations.

68. All the sites lie in rural areas with a relatively open character, and their removal from the Green Belt could have important adverse consequences. Firstly, the site-selection process and criteria would have to be revisited, and secondly, removal from the Green Belt could lead to further development being allowed on these sites, which could adversely affect the openness of the areas and conflict with Green Belt purposes. I deal with site-specific issues later in my report.

69. The SAD has been positively prepared, in consultation with the Gypsy & Traveller community and adjoining local authorities, and fully meets the Gypsy & Traveller accommodation needs established by SSCS Policy H6. The proposed review of the Local Plan, set out in amended Policy SAD1, confirms that Gypsy & Traveller needs will be reviewed, using more recent GTAA's to update current provision and future needs. In these circumstances, I conclude that, with the recommended modification [MM04], the overall approach to Gypsy & Traveller provision is justified, effective and soundly based.

**Overall conclusions**

70. Consequently, I conclude that, with the recommended Main Modifications, 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, is consistent with national policy and with the policies in the adopted Core Strategy, and is justified, positively prepared, effective, deliverable, viable and soundly based.
MATTER 2 – 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?

71. Section 5 of the SAD sets out the general approach and methodology for assessing and selecting sites proposed for housing, Safeguarded Land, Gypsy & Travellers and employment land. It also refers to the Green Belt Review (GBR) and Landscape Sensitivity studies, along with the associated SA & HRA work. It is supported by more detailed documents explaining the methodology, assessment and criteria used in the site-selection process, including the reasons for selecting and discounting potential sites during the course of preparing the SAD [SD6-8; SD10-11; SD21-23; SD36-38; SD52-53; SD60]. This approach is also broadly in line with national guidance on identifying, assessing and selecting sites set out in PPG [ID-3].

Site Selection Methodology

72. The SSCS establishes a sequential approach to selecting sites in the SAD (¶ 6.20), giving priority to sites within the existing settlement boundaries, including previously developed land, and other non-Green Belt sites. Core Policy 1 also recognises that in some settlements it will be necessary to consider greenfield and Green Belt sites because there is no available land higher in the sequential site-selection process.

73. The site-selection methodology developed for the SAD basically consists of a two-stage approach [PS.D.1.003]; firstly, a Tier 1 assessment, covering 10 key material considerations, including the sequential test, impact on the Green Belt, landscape sensitivity, accessibility to amenities, flood risk, highways, and impact on current land use, historic/natural environment and environmental quality. Sites that performed well were taken through to a second stage, and assessed by making qualitative professional judgements on 6 planning criteria, including infrastructure, access to employment, potential benefits and design.

74. Almost 150 potential housing sites, 29 employment sites and 11 gypsy sites were assessed at the first stage, coming from a variety of sources, including the SHLAA, land surveys and calls for sites during the course of preparing the SAD; additional sites were also assessed for Safeguarded Land, and other potential sites were added and reconsidered during the course of preparing the SAD. Both the methodology and the potential sites were subject to public consultation and reviewed as the plan progressed, using the latest available information. The process sought to maximise the use of brownfield sites and the weighting given to the sequential test and impact on Green Belt purposes strongly favoured non-Green Belt sites; where Green Belt release was necessary, the process gave preference to sites that made a lesser contribution to the five key purposes of the Green Belt.

75. Most representors are content with the overall approach and methodology used, but express concerns about the application of the process when selecting the proposed sites and assessing other potential sites, questioning whether the process has been comprehensive, consistent, transparent, objective and accurate, as well as the weighting given to various factors. SSC confirms that, where necessary, the site assessments were reviewed, amended, updated and clarified at each stage of the plan preparation process, including reassessing potential sites. All potential sites were also assessed in the SA work.
76. I understand that, in some cases, the judgement to select specific sites was finely balanced, but the reasons for selecting and rejecting potential sites are clearly set out in the supporting evidence. In many cases, professional judgement was used to balance the various factors in order to reach an objective, consistent and reasoned decision. Given the emphasis in national policy to using brownfield sites and avoiding the release of Green Belt land, I am satisfied that these factors were given appropriate weight in the site-selection process. I also consider that the general approach to assessing and selecting sites reflects that set out in the SSCS and is broadly consistent with national guidance [PPG: ID-3]. The methodology provided a consistent, robust and transparent method for assessing and selecting all reasonable and realistic sites that accorded with the strategy of the SSCS. It also addressed the relevant infrastructure requirements, delivery and viability, which informed the IDP and Viability studies [SD12; SD88-89]. I deal with site-specific points later in my report.

**Green Belt Review**

77. The SSCS highlights the need for a Green Belt Review (GBR) at the SAD stage, with Core Policy 1 confirming that some Green Belt land would have to be released in order to deliver the development strategy and enable the sustainable growth of the settlements. The GBR [SD73-75] focuses the assessment on almost 90 parcels of Green Belt land around the MSVs & LSVs and adjoining the four Strategic Employment Sites, along with potential Gypsy & Traveller sites. Land parcels were defined using constraints and defensible boundaries, and were assessed on an objective and consistent basis, including their contribution to the five purposes of the Green Belt, in order to inform the site-selection process.

78. The GBR did not identify sites for development, but drew out finer-grained variations within the parcels, and highlighted the relative and comparative contribution of particular parcels to Green Belt purposes. The approach to the GBR was informed by discussions with adjoining local authorities, and was amended in the light of comments received. Most representors do not challenge the overall approach and methodology, but some are concerned about the assessment of particular sites, which I cover later in my report.

79. However, the approach does have some shortcomings. Firstly, it is not always clear how decisions were made about the overall ranking of the sites in terms of their overall performance. Secondly, in some cases, the sites finally selected for allocation are smaller than the parcels defined in the GBR, which has sometimes resulted in the lack of any clearly defined boundaries around the outer edges of the sites. At my request, SSC and their consultants undertook some further clarification of these matters, explaining how the final judgements were made about the relative contribution of land parcels to Green Belt purposes [PS.E.1.010.1-2]. They also clarified the approach to selecting smaller sites within the larger Green Belt parcels, confirming that the extent of the allocated site was based on the scale of development needed for that settlement.

80. It is clear that assessing the relative contribution a site makes to Green Belt purposes relies not only on an objective assessment, but also on professional judgement, and in some cases, this may be finely balanced. It is perhaps unfortunate that a finer-grained assessment of the contribution of the smaller allocated sites, rather than the larger land parcels, to the purposes of the Green Belt was not undertaken, but the GBR informed the overall site assessments and the individual site assessments cover the more detailed impact on the Green Belt.
81. Thirdly, in a few cases at the site allocation stage, sites making a greater contribution to Green Belt purposes have been selected over sites which made a lesser contribution. In other cases, a balanced judgement has been made where sites performed similarly. However, in all cases, SSC has explained the particular factors which justified this approach, including the availability and deliverability of sites, along with environmental or other overriding constraints. Clearly, impact on the Green Belt and the contribution to Green Belt purposes is only one, albeit important, factor in the overall site assessment and selection process. It is clear that SSC has properly considered the contribution of potential development land to the purposes of the Green Belt and the impact of individual site allocations on the Green Belt. SSC has also fully examined other reasonable alternatives, including the use of non-Green Belt land, potential sites within the existing development boundaries of the MSVs & LSVs, previously developed, underused, redundant and surplus public land, and has used realistic densities for the proposed allocations.

82. Having considered all the evidence and representations, I consider the GBR provides an appropriate, comprehensive, consistent, objective, transparent, robust, proportionate and soundly based approach to assessing the contribution of land parcels around the main settlements and strategic employment sites to the key purposes of the Green Belt, which has properly informed the site selection process, with sufficient weight accorded to the importance of the Green Belt in this district. I cover the exceptional circumstances and other factors relating to individual settlements and specific sites later in my report.

Overall conclusions

83. Consequently, I conclude that the Site Selection Methodology provides a sound basis for assessing, selecting and rejecting the proposed site allocations, which is effective, objective, comprehensive, transparent, consistent with national policy and is justified with robust, proportionate, accurate and up-to-date evidence, with appropriate weighting given to the various factors. The Green Belt Review also provides a sound, objective, comprehensive, consistent and transparent approach to assessing the significance of sites in terms of the purposes of the Green Belt, which has properly informed the site-selection process.

MATTER 3 – SITE-SPECIFIC MATTERS, INCLUDING PROPOSED SITE ALLOCATIONS (HOUSING, SAFEGUARDED LAND, GREEN BELT, DEVELOPMENT BOUNDARIES, EMPLOYMENT SITES & GYPSY & TRAVELLER PITCHES)

Key issue – Are the proposed site allocations fully justified, suitable and available for the proposed development, sustainable, viable, 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?

84. Policies SAD2-6 propose site-specific allocations to meet the housing, employment, Safeguarded Land and Gypsy & Traveller Accommodation requirements set out in the SSCS, with specific site-selection and planning requirements set out in individual pro-formas in Appendix 1 of the SAD.

Housing, Safeguarded Land, Green Belt & Development Boundaries

85. The SAD identifies sufficient land to meet the minimum housing requirements set out in the SSCS, with an overall surplus of 12-14%; using relatively modest density assumptions, there is a good prospect that these figures will be exceeded in many cases. All sites would also provide a proportion of affordable housing,
usually 40%. The SAD also identifies sufficient Safeguarded Land to meet the overall requirements of the SSCS, and makes the necessary amendments to the Green Belt and Development Boundaries. SSC proposes some amendments to the individual site pro-formas and to Policy SAD9, as highlighted below and later in my report, to ensure consistency avoid duplication of planning requirements.

86. Many of the proposed sites currently lie within the Green Belt and, as indicated earlier, exceptional circumstances need to be demonstrated to justify amending Green Belt boundaries and removing land from the Green Belt. The site assessment process and GBR fully considered the contribution that these sites make to Green Belt purposes and the impact on the Green Belt. In terms of the individual settlements, the need to meet the housing and Safeguarded Land requirements of the SSCS and the absence of sufficient suitable, available, deliverable and sequentially preferable non-Green Belt land within the existing development boundaries, following the comprehensive assessment of non-Green Belt land through the SHLAA and the GBR, provide the exceptional circumstances necessary to justify identifying the sites proposed for development or as Safeguarded Land and removing them from the Green Belt. The site assessment evidence [SD6-8; SD10; SD22-23; SD36-38; SD52-53; SD60] also includes the results of the GBR and clearly sets out the reasons for selecting and rejecting specific sites. Consequently, in all cases where Green Belt land is involved, I am satisfied that no sequentially preferable non-Green Belt sites are available, suitable, deliverable or viable, following the thorough site-selection process, and that the exceptional circumstances necessary to use Green Belt land have been demonstrated.

87. Some representors are concerned that proposed Green Belt boundaries will have to be considered again as part of the proposed review of the Local Plan, and so it is not appropriate to require new defensible boundaries to be established where they do not currently exist. In view of the likely scale of development required in the future, and the commitment to preparing a further GBR, this is almost inevitable. NPPF (¶ 85) confirms that, when defining Green Belt boundaries, local authorities should be satisfied that they will not need to be altered at the end of the plan period. However, since the purpose of the SAD is to deliver the development requirements of the SSCS up to 2028, it would not be appropriate to roll-back the Green Belt boundaries further or leave proposed sites without firm and defensible boundaries within this period. These matters would be more appropriately addressed as part of the comprehensive review of the Local Plan, rather than pre-empting decisions on the future of some areas of land adjoining proposed development sites, particularly given the changing strategic context.

**Bilbrook & Codsall**

88. Bilbrook and Codsall are MSVs which have effectively merged into one settlement, but the SSCS and SAD treat them as separate settlements. The SSCS sets a minimum target of 105 new dwellings for Bilbrook and 222 new dwellings for Codsall which, with net completions and commitments to date, leaves a residual requirement of 63 and 221 new dwellings respectively. The SAD allocates 102 and 230 new dwellings to each settlement respectively, along with 12.5ha and 14.9ha of Safeguarded Land.

89. At Bilbrook, 5 potential sites were assessed as part of the site-selection process, including one within the existing village and the rest adjoining the settlement boundary within the Green Belt. On balance, Site 443 was considered to be the best performing option; another site within the settlement boundary (213) was discounted due to uncertainty about delivery and one making a lesser contribution...
to Green Belt purposes (211) was discounted due to capacity, landscape and flooding constraints. Site 209 adjoins 443, and is another site that performed well in the site-selection assessment and criteria, and is suitable for designation as Safeguarded Land [PS.D.1.005].

90. **Land off Pendeford Mill Lane (443; 6.3ha)** is allocated for 102 dwellings and Safeguarded Land (6.2ha). It is in a sustainable location, close to Bilbrook village, in an area of low landscape sensitivity. However, it lies within a land parcel which makes a considerable contribution to Green Belt purposes and could be seen as reducing the gap between Bilbrook and Pendeford; but provided that the outer boundaries are retained and reinforced, it would maintain the separation between these built-up areas without comprising the integrity or openness of the wider Green Belt, particularly given the presence of a canal and an industrial estate just to the east. A suitable access can be provided, subject to improvements to local road junctions. The proposal is supported by a prospective developer who confirms that the site is suitable, available now, deliverable and viable. SSC has addressed all the remaining planning considerations and justified the specific development requirements. However, the need for a Transport Assessment and further details about the road and junction improvements needed should be added to the planning requirements, to mitigate the impact of extra traffic on the local road network [MM08]. With this recommended modification, the proposal is justified, effective and soundly based.

91. **Land off Pendeford Mill Lane/Lane Green Road (209; 6.3ha)** lies to the south-west of Site 443 and is designated as Safeguarded Land. SSC has addressed all the relevant planning considerations, including the access arrangements, and justified the specific development requirements. However, as with Site 443, some amendments and additions are needed to the list of planning requirements. Firstly, the nature and the extent of road/junction improvements and the need for a Transport Assessment needs to be clarified in the planning requirements, to mitigate the impact of extra traffic on the local road network. Secondly, for the areas of Safeguarded Land (443/229), reference is needed to the retention of boundary vegetation and the provision of strong outer boundaries, to ensure strong, enduring and defensible boundaries and safeguard the adjoining Green Belt from further encroachment [MM08]. With this recommended modification, the proposal is justified, effective and soundly based.

92. At Codsall, 12 potential sites were assessed as part of the site-selection process, two of which were within or adjoining the existing settlement boundary, with the rest adjoining the settlement boundary within the Green Belt. 4 sites were taken forward to the Stage 2 assessment and allocated for housing or Safeguarded Land. SSC considers these represent the best performing sites to meet the amount of housing development and Safeguarded Land required by the SSCS [PS.D.1.006].

93. **Land at the former Adult Training Centre, Histons Hill (228; 0.7ha)** is allocated for 20 dwellings. This is previously developed land within the settlement boundary and is the best performing site in Codsall. The landowner (SCC) fully supports the proposal and confirms that the site is suitable, available now, deliverable and viable. SSC has addressed all the relevant planning considerations, including access and the need for road/junction improvements, and justified the specific development requirements. However, further clarification about the need for Transport Assessment and junction improvements is needed to mitigate the impact of additional traffic on the local road network, along with the need to address land contamination to reflect mitigation measures identified in the SA [MM09]. With this modification, the proposal is justified, effective and soundly based.
94. **Land at Watery Lane** (223; 7.6ha) is allocated for 160 dwellings. This site was designated as Safeguarded Land in the 1996 Local Plan, and is now being developed as Wheatfield Manor (180 dwellings). Site-specific planning considerations and requirements were addressed at the planning application stage and, apart from amending the settlement boundary and recognising the existence of this new housing development, no other proposals are being made in the SAD. However, further clarification of the Transport Assessment and road/junction improvements should be added to the development requirements for consistency and to mitigate the impact of additional traffic on the local road network [MM10]. With this modification, the proposal is justified, effective and soundly based.

95. **Land at Keepers Lane/Wergs Hall Road** (406/419; 17.4ha) is allocated for 50 dwellings (2.5ha) and Safeguarded Land (14.9ha). These sites adjoin the southern edge of the settlement boundary in a sustainable location close to local shops. The proposals are supported by the landowners, who confirm that the housing site is suitable, available now, deliverable and viable. The sites are reasonably well contained by existing woodland and established boundaries, although some of the outer edges will need to be reinforced to provide firm and defensible long-term boundaries to prevent further encroachment in the future; this is recognised in the development requirements. SSC has addressed all the other relevant planning considerations and development requirements, including access, flood risk and drainage issues, which could help to alleviate current access and flooding problems in the adjoining Oaken Park residential area. However, as with other sites at Codsall, there is a need to further clarify the nature of the Transport Assessment, including road/junction improvements, in order to mitigate the impact of additional traffic on the local road network, and refer to the retention of boundary vegetation and the provision of a defensible and enduring outer boundary to safeguard the adjoining Green Belt from further encroachment in the future [MM11]. With this recommended modification, the proposal is justified, effective and soundly based.

**Brewood**

96. Brewood is designated as a MSV in the SSCS, which sets a minimum target of 65 new dwellings; with net completions and commitments, this leaves a residual requirement for 53 new dwellings, which the SAD allocates at one site, along with 3ha of Safeguarded Land at two linked sites.

97. Six sites were considered during the site-selection process, all of which lie within the Green Belt adjoining the settlement boundary; some sites were combined for the assessment process. The remaining 4 sites were assessed at the second stage, since no single site clearly out-performed another. The preferred site (054) was selected, even though it made a greater contribution to Green Belt purposes than an alternative site; it also performed better against the site-selection criteria, whilst there were concerns about the alternative site in terms of highway/pedestrian connectivity, the continuation of ribbon development and lack of integration with the village. A combination of two sites (055/068) formed the preferred option to provide a proportionate amount of Safeguarded Land at Brewood [PS.D.1.007].

98. **Land off Engleton Lane** (054; 3ha) is proposed for 53 dwellings, adjoining the settlement boundary in a sustainable and accessible location. The site performed well in the site assessment process, even though, like all other potential sites around Brewood, is classified as high landscape sensitivity. A suitable access can be provided and the allocation is supported by prospective developers, who confirm that the site is suitable, available now, deliverable and viable. SSC has
considered all the relevant planning considerations, including traffic and access, and justified the site-specific development requirements. However, new defensible boundaries will need to be created along the outer boundaries, including retention of existing trees and hedgelines, to protect the adjoining Green Belt from further encroachment in the future, and these should be added to the development requirements [MM12]. With this recommended modification, the proposal justified, effective and soundly based.

99. *Land off Four Ashes Road* (055/068; 3ha) is proposed as Safeguarded Land for longer-term development. The site performed well in the site assessment process, but there are some issues, including flood risk, which will need to be addressed if and when the site is allocated for development. SSC has considered all the relevant planning considerations and identified the site-specific development requirements. Defensible boundaries will need to be established along the eastern and southern boundaries of the site in the future, but this is generally covered by Policy SAD9, which also includes references to the flood plain, historic environment and landscape. However, reference to the need to retain existing hedgelines and provide a strong and enduring boundary to safeguard the adjoining Green Belt from further encroachment in the future should be added to the planning requirements [MM12]. With this recommended modification, the proposal is effective and soundly based.

**Cheslyn Hay & Great Wyrley**

100. Cheslyn Hay and Great Wyrley are MSVs which have effectively merged into one settlement, but the SSCS and SAD treat them as separate settlements. The SSCS sets a minimum target of 107 new dwellings for Cheslyn Hay and 56 new dwellings for Great Wyrley which, with net completions and commitments to date, leaves a residual requirement of 63 and 87 new dwellings respectively. The SAD allocates 63 and 95 new dwellings to each settlement respectively, along with 5.4ha and 5.2ha of Safeguarded Land.

101. At Cheslyn Hay, six potential sites were assessed as part of the site-selection process, including one within the existing village; this was later discounted as it had planning permission, which is reflected in the residual housing requirement for the village. All the remaining sites adjoin the settlement boundary within the Green Belt and were considered to make some contribution to Green Belt purposes. The two best performing sites (119/118) were assessed in the second stage of the process and selected for allocation as housing or Safeguarded Land. Another potential site (Campsion Wood Quarry) was rejected due to concerns about landscape sensitivity and doubts about the suitability, availability and deliverability of land at this operational quarry, but it could be considered again as part of the Local Plan review [PS.D.1.008].

102. *Land off Saredon Road* (119; 6.3ha) is allocated for 63 dwellings and Safeguarded Land (2.4ha). It is in a sustainable location near to schools, shops and other facilities, on the north-western fringe of the village, in an area of low landscape sensitivity. A suitable access can be provided and the allocation is supported by landowners who confirm that the site is suitable, available now, deliverable and viable. The site assessment process highlighted some issues, which SSC has addressed and justified in the relevant planning considerations and requirements. These include noise mitigation, proximity to Rosemary Quarry, the capacity of local facilities, flooding and sewerage, impact of additional traffic on local roads, and the provision of a car park for the school and leisure centre. SSC are also satisfied that the proposal does not conflict with the minerals safeguarding policy.
However, further clarification about site layout and design based on environmental assessment is needed to reflect the existing mineral operations on the adjoining site, along with reference to the need to maintain the Green Belt gap to the north of the site; requirements more generally covered in amended Policy SAD9 should also be deleted [MM13]. With this recommended modification, the proposal is justified, effective and soundly based.

103. Land off Wolverhampton Road (118; 2.4ha) is allocated as Safeguarded Land for longer-term development. It is considered to be the second-best performing site in the assessment process, which identified several issues that have been addressed in the specific development requirements, including access and proximity to Campions Wood Quarry. SSC has addressed the relevant planning considerations and justified the development requirements, but further clarification is needed about site layout and design based on environmental assessment to take account of the existing mineral operations on the adjoining site [MM13]. With this recommended modification, the proposal is justified, effective and soundly based.

104. At Great Wyrley, 10 potential sites were assessed through the site-selection process, including two within the existing village (one of which was later discounted due to flood risk) and others adjoining the settlement boundary within the Green Belt, one of which was discounted due to concerns about deliverability. As a result of representations at Preferred Options stage, some land parcels were reassessed in terms of their contribution to Green Belt purposes. The best performing sites were taken forward for allocation for housing or as Safeguarded Land [PS.D.1.009].

105. Land at Walsall Road (141; 1.2ha) is allocated for 25 dwellings, comprising a former day centre, now closed, centrally located in the village, close to schools and shops. It is supported by the landowners (SCC), who confirm that the site is suitable, available now, deliverable and viable. SSC has addressed the relevant planning considerations, including access, and justified the specific development requirements. However, the need to address potential land contamination should be added to these requirements to mitigate the impact of development and ensure no health issues arise [MM14]. With this recommended modification, the proposal is justified, effective and sound.

106. Land at Pool View (139; 2.2ha) is allocated for 35 dwellings, in a sustainable location adjoining the northern fringe of the village, and making a limited contribution to Green Belt purposes. It is supported by a prospective developer, who confirms that the site is suitable, available now, deliverable and viable. SSC has addressed the relevant planning considerations, including the need for a traffic noise assessment due to the proximity of the main A5, and justified the specific development requirements. The approach roads are rather narrow, but the HA has confirmed that a suitable access can be provided and has no concerns about the width of local roads or occasional congestion near local schools; in fact, the proposed development could improve Pool View by providing a footway along the northern edge of the road. Given the modest amount of housing allocated to Great Wyrley, there is no current need to extend the site to the west, beyond the well-defined tree-lined boundaries and public footpath. However, there is a need to specify the provision of an easement to Wash Brook, as requested by EA, and retain trees and hedges, to provide robust boundaries around the site [MM15]. With this recommended modification, the proposal is justified, effective and soundly based.
107. **Land at Landywood Lane** (136; 7.4ha) is allocated for 35 dwellings, open space and Safeguarded Land (5.2ha), in a sustainable location, close to the railway station, schools and local shops. A suitable access can be provided and the landowner supports the proposal and confirms that the site is suitable, available now, deliverable and viable. SSC has addressed the key planning considerations, including loss of poorer quality farmland and land stability, and justified the development requirements, including car parking for Landywood station and local allotments. This proposal would effectively open up a new area of development on the southern fringe of the village, and firm defensible boundaries will be needed around the edges to prevent further encroachment in the future; this should be recognised in the planning requirements [MM16]. With this recommended modification, this proposal is fully justified, effective and soundly based.

**Coven**

108. Coven is designated as a LSV in the SSCS, which sets a minimum target of 32 new dwellings; with net completions and commitments, this leaves a residual requirement for 34 new dwellings, for which the SAD allocates 40 new dwellings on one site, along with 2.3ha of Safeguarded Land at another site.

109. Six sites were assessed during the site-selection process, all but one of which lie within the Green Belt adjoining the settlement boundary; a site within the village boundary was later discounted due to uncertainty about delivery and lack of commitment from the landowner. Three sites were taken forward to the second stage, of which two were selected (082/086); these performed well against the site-selection criteria and made a more limited contribution to Green Belt purposes; site 086 was selected for development since it performed better on highway access, whilst site 082 was identified to provide a proportionate amount of Safeguarded Land for longer-term development [PS.D.1.010].

110. **Land West of School Lane** (086; 2ha) is allocated for 40 dwellings, in a sustainable and accessible location, adjoining the northern edge of the settlement. It currently forms part of a much larger field, with no defined boundary along its northern edge. However, the line of overhead electricity pylons provides the limits to development and a new defensible boundary will be created, with open space, as confirmed in the planning requirements. A suitable access can be achieved and the HA has no concerns about the impact of additional traffic on the local road network. The allocation is supported by prospective developers who confirm that the site is suitable, available now, deliverable and viable. SSC has considered all the relevant planning considerations and justified the site-specific development requirements. However, the planning requirements should specifically recognise the need to provide a strong and enduring northern boundary, to safeguard the adjoining Green Belt from further encroachment in the future [MM17]. With this recommended modification, the proposal is justified, effective and soundly based.

111. **Land East of School Lane** (082; 2.3ha) is identified as Safeguarded Land for longer-term development, in a sustainable and accessible location on the northern fringe of the village. SSC has considered all the relevant planning considerations and justified the site-specific development requirements, including the principle of a new access and the need for noise mitigation measures related to the nearby A449. However, a defensible boundary will need to be created along its northern edge, with the existing playing fields forming a firm boundary to any future development, in order to safeguard the adjoining Green Belt from further encroachment in the future [MM17]. With this recommended modification, the proposal is justified, effective and soundly based.
Essington

112. Essington is designated as a LSV in the SSCS, which sets a minimum target of 23 new dwellings, but since completions and commitments have exceeded this figure, the SAD makes no further housing provision here. Essington was not included in the GBR since the housing target has been met and sufficient land is already designated to meet a proportionate amount of Safeguarded Land, as required by the SSCS [PS.D.1.011].

113. The SAD confirms the retention of existing Safeguarded Land off Hobnock Road (153; 9ha) identified in the 1996 Local Plan. This site now has outline planning permission (210 dwellings), but since a reserved matters application is still awaited, the site remains designated as Safeguarded Land. However, even if this site is developed within the current plan period, sufficient Safeguarded Land exists elsewhere in the district to meet the SSCS requirement [SD100]. The SAD also proposes to amend the settlement boundary to take account of the development of previously designated Safeguarded Land at Elmwood Avenue (152). Since the SAD makes no new proposals for further development at Essington, this approach is justified and soundly based.

Featherstone

114. Featherstone is designated as a LSV in the SSCS, which sets a minimum target of 40 new dwellings; with net completions and commitments, this leaves a residual requirement for 43 new dwellings, for which the SAD allocates 60 new dwellings, along with 1.6ha of Safeguarded Land, on adjoining sites.

115. The site-selection process assessed 12 potential sites for housing or Safeguarded Land in and around Featherstone. One site within the village (167) was later discounted due to uncertainties about deliverability. All the remaining sites lie within the Green Belt beyond the existing settlement boundary, but one site (168) comprises previously developed land, and the others were viewed as making a considerable contribution to Green Belt purposes. Although Site 170 scored well against the relevant criteria, Site 397 was selected as Safeguarded Land, since it adjoins Site 168 and would provide better connectivity with the village and enable comprehensive master-planning of both sites, including an amenity landscaped buffer adjoining the proposed employment land at ROF Featherstone [PS.S.1.012]. One developer has proposals to develop other land around the northern fringe of the village, but this is not needed at this time to meet current SSCS requirements. SSC has also considered the cumulative impact of housing at Featherstone and new employment development and a new road to serve ROF Featherstone, with further information provided at my request [PS.E.1.008]; a masterplan for the whole area has also been prepared.

116. Land at Brinsford Lodge (168; 2.8ha) is allocated for 60 dwellings, in a sustainable location within walking distance of village facilities, adjoining the settlement boundary formed by Malayan Way. Although all the previous buildings have been removed, on my visit I saw that the site is covered by extensive concrete bases, hardstandings, tarmac roads and pathways, with foundations and underground bunkers, which are clearly visible and have not blended into the landscape. Since its status as previously developed land has been recognised in a previous planning appeal and the site will soon be included in SSC’s Brownfield Land register, there can be no doubt that it is correctly classified as previously developed land. The proposal is also supported by prospective developers who confirm that the site is suitable, available now, deliverable and viable.
117. However, the western boundary of the proposed housing site is currently undefined and a strong, defensible boundary will need to be established to protect the remaining Green Belt from further encroachment in the future and form a landscaped buffer between the site and the extended area of ROF Featherstone [MM18]. SSC has considered all the relevant planning considerations and justified the site-specific development requirements, including access, noise mitigation and the provision of allotments and recreation uses. However, further clarification about the access arrangements, the nature of the recreational uses and the need to address land contamination issues and provide historical interpretation material should also be added to the list of planning requirements, in order to be effective, deliver long-standing community aspirations, ensure appropriate mitigation and reflect the historical importance of the site [MM18]. With this recommended modification, the proposal is soundly based.

118. Land adjacent to Brinsford Lodge (397; 1.6ha) is identified as Safeguarded Land to meet longer-term housing needs. It adjoins Site 168 and its allocation would enable comprehensive master-planning and ensure the establishment of a landscaped buffer between future housing and the proposed extension to ROF Featherstone. SSC has considered all the relevant planning considerations, and justified the site-specific development requirements, including access arrangements. This is a greenfield site and, like Site 168, would need a firm, defensible boundary to be established along its western edge, to prevent the adjoining Green Belt from further encroachment and establish the landscaped buffer; further clarification about noise mitigation and flood risk assessment is also needed in the site-specific requirements, in order to be effective and ensure adequate mitigation measures are provided [MM18]. With this recommended modification, the proposal is justified and soundly based.

**Gospel End/Baggeridge**

119. Gospel End is defined as an “Other Village or Hamlet” in the settlement hierarchy and the SSCS makes no specific provision for additional housing here. However, it requires the SAD to review existing Major Developed Sites in the Green Belt, such as the Baggeridge Brick site. This has now been redeveloped to provide a mixed-use development, including a craft village, housing, nursing home, open space, landscaping and associated infrastructure. Recognising the nature and extent of this redevelopment, it is no longer possible or necessary to keep this site permanently open as it no longer performs any Green Belt purposes. The SAD therefore proposes to establish a new village envelope around the site, providing a new development boundary [PS.D.1.12]. This is fully justified and provides an effective and soundly based approach to this new development area, as well as providing the exceptional circumstances to justify removing the site from the Green Belt.

**Huntington**

120. Huntington is designated as a LSV in the SSCS, but it makes no provision for additional housing here, largely due to the nature and extent of redevelopment which took place at the former Littleton Colliery site before its adoption. This area has now been fully redeveloped with housing and associated uses and it is no longer possible or necessary to keep the land permanently open since it no longer performs Green Belt purposes. The SAD therefore proposes to amend the development boundary of Huntington to incorporate this redeveloped area. This is fully justified and provides an effective and soundly based approach to this redeveloped area, as well as providing the exceptional circumstances to justify removing the site from the Green Belt [PS.D.1.0013].
121. The SAD also proposes to identify an area of Safeguarded Land at Pear Tree Farm (016; 1.6ha), on the northern fringe of Huntington. This was selected after assessing six potential sites, all of which lie within the Green Belt adjoining the settlement boundary and make a considerable contribution to Green Belt purposes. The selected site is considered to be the best performing option, largely because it would cause least harm to Green Belt purposes [PS.D.1.014]. SSC has addressed all the relevant planning considerations and justified the site-specific development requirements, including access arrangements, impact on the landscape and setting of a nearby listed building, as well as the need for mitigation measures to address historic coal mining and noise from an adjacent industrial estate. However, the need to retain tree and hedgerow boundaries and provide strong and enduring outer boundaries should be added to the planning requirements to safeguard the adjoining Green Belt from further encroachment in the future [MM19]. With this recommended modification, the proposal is justified, effective and soundly based.

**Kinver**

122. Kinver is designated as a MSV in the SSCS, which sets a minimum target of 91 new dwellings; with net completions and commitments, this leaves a residual requirement for 48 new dwellings, for which the SAD allocates 60 new dwellings, along with 3.9ha of Safeguarded Land, on two sites.

123. The site-assessment process considered 8 potential sites in and around Kinver, but a site within the village boundary was later discounted since planning permission had been granted for housing development; the remainder all adjoin the existing settlement boundary within the Green Belt. 3 sites, including those which made a lesser contribution to Green Belt purposes, were taken forward to the Stage 2 selection process; one was later withdrawn due to access constraints, and the remainder were allocated for housing or Safeguarded Land [PS.D.1.015]. There is some local concern about the overall scale of new housing allocated to Kinver, but this has already been established in the SSCS.

124. Land off Hyde Lane (270; 1.6ha) is allocated for 30 dwellings, lying to the rear of houses in Hyde Lane, within walking distance of village facilities. The proposal is supported by a prospective developer who confirms that the site is suitable, available now, deliverable and viable. SSC considers this is the best performing greenfield site in the assessment process, but several issues were identified. There is local concern about the implications of additional traffic, particularly at nearby Potters Cross junction. Although this can become congested, particularly at busy school times, there have been few accidents and the HA is satisfied that there are no insurmountable traffic issues; these can be examined further in a transport assessment. SSC has addressed the other planning considerations, including access, and justified the site-specific requirements, including flood risk assessment and connectivity to open space. However, further clarification about the content of the transport assessment is needed, in order to mitigate the impact of additional traffic, along with an interpretation panel to recognise the significance of former heritage features on the site [MM20]. With these recommended modifications, the proposal is effective, justified and soundly based.

125. Land south of White Hill (274; 5.5ha) is allocated for new housing and Safeguarded Land (3.9ha). It adjoins the existing settlement boundary in a sustainable location not far from village facilities. The housing proposal is supported by a prospective developer who confirms that the site is suitable, available now, deliverable and viable. The site performed well in the site-assessment process, but there are several issues to address.
126. Firstly, there is concern about the impact of new development on the setting, significance, appreciation and interpretation of the Scheduled Ancient Monument at Kinver Camp Iron Age hillfort and the non-designated rock houses built into Holy Austin Rock, and nearby Potters Cross Farm. Heritage Impact Assessments have been undertaken by consultants of SSC and the prospective developers, consulting the Historic Environment Site reports [SD96-97]. These include a thorough assessment of the potential impact of the proposed development on the setting of these heritage assets, proportionate to their importance and their setting, and a response to Historic England’s own assessment [PS.F.011].

127. Having visited the site and these heritage assets, it is apparent that the proposed development would be seen from some points on the elevated locations on Kinver Edge, including from the periphery of the hillfort. However, there are extensive areas of intervening woodland, the proposed sites lie some 500m away from the heritage assets and the new housing would be seen in the context of existing development within Kinver village, which has evolved and changed since the hillfort was established. Although there would be a limited adverse impact on the setting and significance of these heritage assets, I consider that the underlying character, appreciation and interpretation of these heritage assets and historic features would not be significantly eroded or impaired. Consequently, I conclude that the overall impact of the proposed development would cause less than substantial harm to the setting and significance of these heritage features.

128. In coming to this conclusion, I have also borne in mind the public benefits of the proposal, including the need to identify new sites for housing development at Kinver and the benefits of meeting these needs, including providing affordable housing and additional open space, and the lack of other suitable, available, deliverable and sequentially preferable sites. The general requirement under Policy SAD9 to provide a heritage statement would ensure that the potential impact on heritage assets is addressed in detail at the planning application stage. However, in order to ensure that any potential adverse impact is effectively mitigated, the planning requirements should require the site design and layout to maintain views of Kinver Edge and Holy Austin Rock from the north-eastern corner of the site adjacent to White Hill [MM21].

129. Secondly, there is local concern about the impact on, and loss of, Green Belt. However, this is a well-contained site, lying between existing development along the frontage of White Hill and bounded by woodland. Compared with other site options, it makes a lesser contribution to Green Belt purposes. Given the absence of other suitable, available, deliverable and sequentially preferable non-Green Belt land within the confines of the village to meet the specified housing needs of Kinver, following the comprehensive assessment of potential options through the SHLAA and GBR, the exceptional circumstances necessary to justify amending the Green Belt boundary and releasing this site for development or Safeguarded Land can be demonstrated. However, in order to protect the adjoining Green Belt from further encroachment in the future, the southern and western boundaries of the Safeguarded Land should be reinforced, using existing woodland and new hedges where necessary, to enhance landscaped boundaries [MM21].

130. Thirdly, there is concern about the impact of additional traffic on the nearby Potters Cross junction. However, as with Site 270, the HA is satisfied that there are no insurmountable traffic issues, which can be examined further in a transport assessment. Nevertheless, the content of the transport assessment should be clarified in the planning requirements, in order to mitigate the impact of additional traffic at Potters Cross junction [MM21]. SSC has addressed the other planning
considerations and justified the specific development requirements, including access, connectivity to existing open space and maintenance of public footpaths. However, there is a need to specify and clarify the matters outlined above, and with this recommended modification, this proposal is effective, justified and soundly based.

**Pattingham**

131. Pattingham is designated as a LSV in the SSCS, which sets a minimum target of 22 new dwellings. However, since completions and commitments have exceeded this figure, the SAD makes no further housing provision at this settlement, but allocates 0.8ha of Safeguarded Land.

132. 11 sites were assessed as part of the site-selection process, all of which adjoin the settlement boundary and lie within the Green Belt; most make a considerable contribution to Green Belt purposes. Following representations at Preferred Options stage, the GBR was updated and some sites were reclassified in terms of their contribution to Green Belt purposes. The site finally selected (251) is considered to make a lesser contribution to Green Belt purposes than other potential sites, such as 255 [PS.D.1.016].

133. Land off Hall End Lane (251; 0.8ha) is designated as Safeguarded Land to provide a proportionate amount of potential land for longer-term development. It forms part of a much larger open field and adjoins existing development along the southern edge of the village, immediately next to a new “rural exceptions” housing scheme off Hall End Lane; it is also supported by a prospective developer. SSC has addressed all the key planning considerations and justified the development requirements, including the principle of access. However, the need to retain mature hedgerows and retain views to the listed church should be added to the planning requirements, to protect and mitigate the potential impact on the setting of this designated heritage asset, along with the need to provide a strong and enduring southern boundary to safeguard the adjoining Green Belt from further encroachment in the future [MM22]. Given the modest requirements for Safeguarded Land at Pattingham and the need to avoid unnecessary removal of further land from the Green Belt and loss of higher-grade farmland, there is no justification for extending this site southwards at the present time. With the recommended modification, this proposal is justified, effective and soundly based.

**Penkridge**

134. Penkridge is designated as a MSV in the SSCS, which sets a minimum target of 370 new dwellings. However, since completions and commitments (largely at Lyne Hill) have exceeded this figure, the SAD makes no further housing provision here, but confirms the retention of the existing Safeguarded Land off Cherrybrook Drive identified in the 1996 Local Plan.

135. Six sites were assessed as part of the site-selection process, of which the existing Safeguarded Land at Cherrybrook Drive (005; 4.2ha) was considered to be the best performing option; a site within the existing settlement boundary was discounted since it lies within a flood plain [PS.D.1.17]. SSC has addressed all the relevant planning considerations, including access and the need for mitigation from noise and air pollution due to the proximity of the M6 motorway. Since the site has already been released from the Green Belt, there is no need to demonstrate exceptional circumstances.
136. The main issue is whether this site should be allocated for development within the current plan period. However, since existing completions and commitments have already exceeded the SSCS housing target for Penkridge, there is no need to allocate further sites for housing development here at this time. The scale of potential development on this site (80 dwellings) would significantly increase the SSCS housing target for Penkridge and could have a potential impact on the nearby Cannock Chase SAC, as confirmed in the SA/HRA work; its allocation for development now would also require alternative Safeguarded Land to be identified at Penkridge. In these circumstances, I consider it should remain designated as Safeguarded Land for future longer-term development, whilst the possibility of releasing the land earlier could be reconsidered in the Local Plan Review.

**Perton**

137. Perton is designated as a MSV in the SSCS, which sets a minimum target of 166 new dwellings; with net completions and commitments, this leaves a residual requirement for 163 new dwellings, which the SAD allocates at one new site, along with 7.5ha of Safeguarded Land on adjoining land.

138. 8 sites were considered as part of the site-selection process, all of which adjoin the existing settlement boundary within the Green Belt and make a considerable contribution to Green Belt purposes, particularly those on the eastern and southern edges of Perton, close to the Wolverhampton urban area. Several sites performed similarly in the final selection process, but the site finally allocated (239) was considered to provide more effective linkages into the existing road network, and has stronger, defensible outer boundaries, helping to safeguard the adjoining Green Belt and protect it from further encroachment in the future; it is also of an appropriate size to accommodate the required number of dwellings and Safeguarded Land. Developing on land to the north (407/246a) could adversely affect the adjoining higher-grade landscape, whilst developing land to the south of Perton (238a) would significantly reduce the open gap between the edge of Perton and the Wightwick urban area, even if a strong new boundary were to be established within the site along the southern edge of the housing area [PS.D.1.018].

139. *Land west of Wrottesley Park Road* (230; 16.6ha) is allocated for 163 dwellings and 7.5ha of Safeguarded Land. Although lying on the western side of the peripheral distributor road, it is within walking distance of local facilities and is a well-contained site bounded by woodland, other vegetation and a golf course. The housing proposal is supported by landowners who confirm that the site is suitable, available now, deliverable and viable. The HA has confirmed that a suitable access can be provided, subject to improvements at the A41 road junction. SSC has addressed all the relevant planning considerations and justified the site-specific development requirements, including flood risk, connectivity with existing open space and the provision of new allotments. Subject to clarifying the traffic impact assessment relating to the road/junction improvements, in order to avoid adverse impact on the local road network and deliver the necessary mitigation measures, and strengthening the outer boundaries to protect the adjoining Green Belt and higher-grade landscape from further encroachment in the future [MM23], this proposal is effective, justified and soundly based.

**Swindon**

140. Swindon is designated as a LSV in the SSCS, which sets a minimum target of 23 new dwellings; with net completions and commitments, there is a residual requirement for 9 new dwellings, for which the SAD allocates 10 new dwellings on one site, along with an area of Safeguarded Land (0.8ha) on adjoining land.
141. 6 sites were considered as part of the site-selection process, including one site within the village which was later discounted since it had received planning permission for new housing; the remaining sites adjoin the settlement boundary within the Green Belt. At this initial stage, Site 313 was considered to be the best performing site, but the site promoters advised that it was not available to deliver the required amount of housing. At Preferred Options stage, Sites 312a & 437 were proposed for new housing and Safeguarded Land respectively, as the next best performing sites. Following consultation, SSC was advised that Site 313 was available and should not have been withdrawn, so it was reintroduced as the proposed site allocation for housing and Safeguarded Land in the Publication draft [PS.D.1.019]. Although local residents and organisations are concerned about the changes to the previous proposals, I am satisfied that adequate consultation and engagement took place at various stages during the plan preparation process and that SSC took full account of the representations made.

142. At first sight, there seems little to choose between the potential sites in the site-selection process, including the SA and GBR. However, closer examination reveals some subtle differences in the details of the overall assessment. Whilst most peripheral sites make a considerable contribution to Green Belt purposes, some have higher landscape sensitivity, are further from local facilities, would consolidate ribbon development or significantly extend the development limits of the village, or have doubts about availability and deliverability; some of the smaller sites could not provide a proportionate amount of Safeguarded Land. Consequently, I am satisfied that, in a balanced judgement, the site proposed for allocation is the most appropriate option at present.

143. Land off Himley Road (313; 0.3ha) is allocated for 10 dwellings and Safeguarded Land (0.8ha). It lies on the eastern edge of the village, with an existing large barn and adjoining a recently developed Residential Exception Site. It lies within a land parcel which makes a considerable contribution to Green Belt purposes, but it performs better than some on other site-selection criteria, including landscape sensitivity; it is also large enough to provide sufficient Safeguarded Land as well as some community benefits, such as open space. The landowners support the proposal and confirm that the site is suitable, available now, deliverable and viable. A suitable access can be provided and the HA has no concerns about the impact of additional traffic on the local road network. SSC has addressed all the other relevant planning considerations and justified the specific development requirements. However, since the site is effectively a sliver of land forming part of a much larger field, a firm defensible boundary will need to be established on its eastern and northern boundaries, to avoid further encroachment in the future and safeguard the adjoining Green Belt. The planning requirements should also refer to the need for the design to be sympathetic to the nearby listed farmbuildings, to protect the setting of nearby heritage assets [MM24]. With these recommended modifications, the proposal is justified, effective and soundly based.

Wheaton Aston

144. Wheaton Aston is designated as a LSV in the SSCS, which sets a minimum target of 32 new dwellings; with net completions and commitments, this leaves a residual requirement for 8 new dwellings, for which the SAD allocates 15 new dwellings, proportionate to the needs of the village. Wheaton Aston is not surrounded by the Green Belt, which lies further to the east of the village. More development land is not being allocated here in view of the limited size and range of facilities in the village and given its role and status in the settlement hierarchy.
145. 13 potential sites were assessed as part of the site-selection process, some of which were within the settlement boundary, but were granted planning permission during the preparation of the SAD or had uncertainty about delivery. Site 379 was considered to be the best performing option of the remaining sites, all of which lie in the open countryside, adjoining the settlement boundary, and outside the Green Belt [PS.D.1.20].

146. Land at Ivetsey Road (379; 0.8ha) is allocated for 15 dwellings, in a sustainable and accessible location, adjoining the southern edge of the settlement. The allocation is supported by prospective developers who confirm that the site is suitable, available now, deliverable and viable. SSC has considered all the relevant planning considerations and justified the site-specific development requirements, including the access arrangements and the impact on a nearby SAC. However, the site currently forms part of a much larger field, and strong, enduring landscape boundaries will need to be established, particularly along the southern and eastern edges, retaining existing tree/hedge lines, to contain the site and protect the open countryside from further encroachment. Confirmation about the position of the access and the need to address land contamination issues should also be added to the planning requirements, to ensure that these issues are effectively addressed. With these recommended modifications [MM25], the proposal is fully justified and soundly based.

**Wombourne**

147. Wombourne is designated as a MSV in the SSCS, which sets a minimum target of 256 new dwellings; with net completions and commitments, this leaves a residual requirement for 164 new dwellings, for which the SAD allocates 179 new dwellings, along with 14.1ha of Safeguarded Land.

148. 23 sites were considered as part of the site assessment process; this included 6 sites within the settlement boundary (some of which were later discounted since they gained planning permission during the course of preparing the SAD, or there were concerns about deliverability); the remainder adjoin the settlement boundary within the Green Belt. 10 sites were carried forward to the Stage 2 assessment and, after some reassessment following representations at Preferred Options stage, the best performing sites were either allocated for development or identified as Safeguarded Land [PS.D.1.021].

149. Land off Ounsdale Road (281a; 1ha) is a brownfield site within the village, close to local facilities and formerly in employment use; it is allocated for 19 new dwellings and now has outline planning permission for housing. The site assessment process identified several issues which SSC has addressed and justified in the planning considerations and requirements, including access and flood risk. However, the need to address land contamination and explore improvements to Warstones Brook need to be added to the planning requirements, to overcome current flooding issues, as required by the EA [MM26]. With this recommended modification, the proposal is justified, effective and soundly based.

150. Land north of Beggars Bush Lane (302; 4.1ha) is allocated for 80 dwellings, lying on the south-eastern fringe of the village, well contained between the existing built-up area and the main A449. SSC considers it to be one of the best performing greenfield sites, and which makes a lesser contribution to Green Belt purposes than other potential sites. The proposal is supported by a potential developer who confirms that the site is suitable, available now, deliverable and viable. Beggars Bush Lane is currently quite narrow and bounded by steep banks,
but the HA is confident that these issues can be overcome by improved vehicular/pedestrian access. SSC has addressed the other relevant planning considerations, including potential impact on nearby heritage assets, and justified the specific development requirements. Consequently, this proposal is justified, effective and soundly based.

151. **Land north of Bridgnorth Road (283; 3.7ha)** is also allocated for 80 dwellings. The site lies on the south-eastern fringe of the village next to Sytch Lane cemetery, beyond the existing built-up area and former railway. Prospective developers support the proposal and confirm that the site is suitable, available now, deliverable and viable. A suitable access can be provided from the main road and SSC has addressed the other relevant planning considerations, including potential impact on wildlife, and justified the development requirements. However, the site forms part of a larger field, which makes a considerable contribution to Green Belt purposes. Consequently, a new defensible long-term boundary will need to be established along the outer edges, retaining existing trees and planting new hedges, to avoid further encroachment in the future and protect the remaining Green Belt between Wombourne and Himley; this should be added to the site-specific requirements [MM27]. With this recommended modification, the proposal is justified, effective and soundly based.

152. **Land off Orton Lane (416; 2.8ha)**, adjoining the northern fringe of the village, is identified as Safeguarded Land for longer term development. The site performed well in the assessment process, and whilst it lies within a land parcel which makes a considerable contribution to Green Belt purposes and is of high landscape sensitivity, it is reasonably well contained. The site-assessment process identified several issues which SSC has addressed in the planning considerations and development requirements, including access. However, in order to mitigate any harm to trees and wildlife, the need for aboricultural and ecological surveys should be added to the planning requirements, along with the need to retain existing hedgelines along the eastern boundary, to recognise historic field patterns, protect the adjoining Green Belt from further encroachment and prevent coalescence with Lower Penn [MM28]. With this recommended modification, the proposal is justified, effective and soundly based.

153. **Land north of Poolhouse Road (285/459/413; 11.3ha)**, adjoins the north-western edge of the settlement and is identified as Safeguarded Land to meet longer-term development needs. This proposal comprises three parcels of land, which like many sites around Wombourne, make a considerable contribution to Green Belt purposes, but the sites performed well in the assessment process. SSC has addressed the relevant planning considerations, including access and potential impact on nearby heritage assets, and justified the development requirements. However, the need to retain existing trees and hedges along the outer boundaries and establish a strong, defensible north-western boundary should be added to the specific requirements to protect the remaining Green Belt from further encroachment in the future [MM29]. With this recommended modification, the proposal is justified, effective and soundly based.

**Employment site allocations**

154. Policy SAD5 proposes to allocate 62ha of additional employment land at two Strategic Employment Sites, including 40ha as an extension to the i54 South Staffordshire site and 12ha as an extension to the existing 24ha of land at ROF Featherstone. It also sets out the key development requirements for each of these extensions. I have already dealt with the strategic issues relating to this
policy earlier in my report and I deal with the detailed changes proposed to the policy and accompanying text later in this section. Policy SAD6 covers the associated amendments to the existing Green Belt and development boundaries required by these proposed allocations. The proposed extensions have been subject to full site-appraisal, including the GBR, considering a range of spatial and locational options at the four existing Strategic Employment Sites. SSC considers these allocations represent the most suitable and appropriate locations for extensions to these Strategic Employment Sites.

155. Some representors are concerned that further employment land has not been allocated at the other strategic employment sites, including Hilton Cross and Four Ashes. However, SSC has assessed all suitable and alternative spatial options, providing sound and clear-cut reasons for rejecting further allocations at these other locations. Moreover, there is currently no need or justification for additional employment land to be identified over and above that which is proposed in the SAD. I can therefore see no conclusive evidence or any compelling need to make further employment land allocations at these other strategic employment sites at this time, although SSC will examine this again when the Local Plan is reviewed.

Land west of i54, South Staffordshire

156. i54 is a successful new business park covering some 90ha on the northern edge of Wolverhampton, with direct access off the M54(J2), within an Enterprise Zone. The site is now almost complete and is occupied by flagship companies, including Jaguar Land Rover (JLR), Moog Aircraft Group and Eurofin. The SAD proposal results from a partnership between SSC, WCC and SCC, who strongly support the proposed extension, as do the S&SLEP & BCLEP and JLR; there are few objections to the proposal. Various employment land studies [SD082-086] highlight the strategic importance of the proposed i54 extension, particularly its significant sub-regional benefits in terms of investment, job creation and proximity to an internationally significant cluster of automotive and aerospace businesses, as confirmed in the S&SLEP SEP [PS.E.1.006]; the proposal would also help to meet the identified shortfall of high-quality employment land in the adjoining Black Country [SD84-86]. This provides the robust evidence and reasoned justification required by SSCS Core Policy 7 to justify the proposed development.

157. The existing i54 business park is well contained within its existing boundaries, with little land remaining for expansion. The proposed extension directly adjoins the western boundary of the development and is bounded by Lawn Lane to the west and by the M54 to the north. The proposed extension would represent a 40% increase in the size of the development, at the upper end of the "modest" extension envisaged in the SSCS and High-Quality Employment Land Study [SD85]. SSC’s site-assessment process and GBR confirms that, apart from developing Green Belt land on the northern side of the M54, beyond the existing robust and defensible boundary and separated from i54 by the motorway, this is the only suitable, available, deliverable and viable area of land into which i54 could expand. Currently open fields, there are no serious constraints impeding its future development, which could come on stream around 2020-2021 after providing a new access road. The site also has clear, defensible boundaries to minimise its impact on the wider Green Belt. The need to identify additional land for employment development set out in the SSCS, helping to address the shortfall in high-quality employment land in the Black Country, and the absence of other suitable, available, deliverable and viable non-Green Belt sites demonstrates the exceptional circumstances needed to justify amending the Green Belt boundary and releasing the land from the Green Belt.
158. SSC has addressed all the other planning considerations, including impact on the local road network, environment, landscape, amenity, wildlife, infrastructure and services; the key development requirements have also been justified, including the type of business uses and need for EIA and flood risk assessment [PS.D.1.022]. Both Highways England and the HA are satisfied that the site can be accessed via the existing i54 road network. However, clarification about the scope of the Transport Assessment needs to be added to the development requirements, to ensure mitigation of any adverse impact on the strategic road network, as required by Highways England. Clarification is also needed about the delivery of measures to mitigate any adverse impact on archaeological assets, as required by Historic England. Much of this work is already underway. With these recommended modifications [MM06], the proposal would represent a logical, viable, sustainable and deliverable extension to the existing i54 business park, which will bring significant economic benefits, and is fully justified, effective and soundly based.

**Land east and west of ROF Featherstone**

159. ROF Featherstone is a former military depot lying to the west of Featherstone village and north of the M54 motorway. The former SSLP (1996) allocated some 24ha of land for development here, including 14ha for employment and 10ha as a landscaped planting belt. The SSCS recognises the importance of this site in the district’s portfolio of employment land and supports a modest extension, if justified by robust evidence. The SAD allocates a further 12ha of employment land on either side of the existing allocation, representing a 50% expansion and resulting in a 36ha employment site with a 10ha planting belt. Construction of Phase 1 of the development could commence in 2019/20.

160. The delivery of the overall proposal is the result of a partnership between SSC, SCC, WCC, the Black Country authorities and the site promoters, and is strongly supported by the LEPs. It has been subject to several viability, deliverability, landscape, visual and transport studies, including access options, a Masterplan and SOCG [SD48; SD87; SD99; SD103-104; SD108; PS.D.1.022]. ROF Featherstone is also identified as a priority strategic employment site in the S&SLEP SEP. The additional site allocations have been subject to full site assessment, including the GBR and consideration of alternative site options at the other strategic employment sites. The possibility of a western extension of the site has been considered, but this would breach well-defined boundaries and would be separated from the main site by the West Coast Main Line (WCML); however, it could be reconsidered when the Local Plan is reviewed. The proposed extensions would not only assist the viability and deliverability of the overall proposal, but also make a significant contribution to the district’s employment land supply and help to meet the shortfall of high-quality employment land in the adjoining Black Country. This provides the robust evidence required by SSCS Core Policy 7 to justify the proposed extension to this employment allocation.

161. The overall development area is well contained by the M54 and surrounding roads, and the GBR confirms that the proposed extensions make a less than considerable contribution to Green Belt purposes. The proposed extensions would have firm, defensible outer boundaries, separated from the proposed housing areas at Featherstone village by an extensive landscaped buffer area. The need to deliver a long-standing employment allocation and contribute to the need for high-quality employment land in the Black Country, along with the absence of other suitable, available, deliverable and viable non-Green Belt sites in the locality demonstrates the exceptional circumstances needed to justify amending the Green Belt boundary at ROF Featherstone and releasing this land from the Green Belt.
162. The main constraint to the delivery of the proposed ROF development is the existing road access. At present, the area is accessed by roads, either from the east through the residential area of Featherstone village, or from the south and west by roads physically constrained by narrow/low bridges; the surrounding strategic highway network is also congested. Highways England is currently investigating the provision of the M54/M6/M6(T) link road to relieve the congested A460, which could be constructed after 2021, and SSC & SCC will continue to engage with Highways England about the progress of this scheme. SCC has undertaken various technical studies, including investigating road options to serve ROF Featherstone, resulting in two preferred options [SD099; SD108]. Option 7 would provide a new route from the west from the A449, but is costly due to the need to provide a new bridge over the WCML. Option 9 would provide a new road from the south-east, south of the M54 from the A460, but this would run relatively close to Moseley Old Hall (Grade II* listed), where both National Trust and Historic England have particular concerns and maintain their objections to this road option.

163. Consultants of SSC and the site promoters have undertaken Heritage Impact Assessments, after consulting the Historic Environment reports [SD96-97]. These reports thoroughly assess the potential impact of road Option 9 on the setting of this significant heritage asset, proportionate to its importance and setting, and conclude that the new road would cause less than substantial harm to the setting of Moseley Old Hall; this conclusion is shared by National Trust, who considers the degree of harm would be at the upper end of the scale.

164. Having visited the site and setting of Moseley Old Hall, it is clear that the route of road Option 9 would encroach into the setting of this important heritage asset, both physically and visually, severing its link with Moseley Road and Moseley Hall Farm to the south and impairing the appreciation of the rural landscape and the historic southern escape route of King Charles II from the Old Hall (Monarch’s Way). However, although the impact of the new road would be significant, I consider it would cause less than substantial harm to the setting and significance of Moseley Old Hall in the overall assessment, particularly given the limited number of suitable alternative road routes to serve the proposed development from the south and the undoubted economic benefits of delivering the new employment development. Although the general provisions of Policy SAD9 would ensure that the potential impact on heritage assets is addressed in more detail at the planning application stage, in view of the importance of these heritage assets, the development requirements should specifically refer to the need to provide a heritage assessment and deliver any site-specific mitigation measures in order to be effective and address these important aspects of the development [MM06].

165. Furthermore, this is not the only suitable road option to serve the proposed development; Option 7 is also a viable and deliverable alternative which, when further detailed work is undertaken, could provide the eventual solution. Both the HA and Highways England are satisfied that a safe and suitable new access could be provided to serve ROF Featherstone, using either road Option 7 or 9. The S&SLEP has also committed £1.5 million towards funding a new access road, which could be constructed from 2019. Consequently, I conclude that viable and deliverable options to provide a new road access to serve the proposed development are available, with a realistic prospect of implementation, without unacceptably harming the setting of Moseley Old Hall. Furthermore, there is sufficient certainty that the proposal can be developed within the plan period.
166. SSC has addressed all the other planning considerations, including impact on the local road network, environment, landscape, residential amenity, wildlife, infrastructure and services; the key development requirements have also been justified, including the need for EIA and flood risk assessment [PS.D.1.022]. However, clarification of the scope of the Transport Assessment and the standard of road design and mitigation is needed, as required by Highways England, along with any site-specific mitigation related to archaeological interests [MM05-06]. In view of the delays in finalising the route of the new M54/M6/M6(T) link road, “in early 2018” should be amended to “2018”. With these recommended modifications, the proposal is justified, effective and soundly based.

**Gypsy & Traveller pitches**

167. Policy SAD4 lists 12 sites to accommodate 20 new Gypsy & Traveller pitches, with the site boundaries shown in Appendix 2. All these proposed pitches are on existing established Gypsy & Traveller sites, all within the Green Belt, many of which are in remote rural locations. In overall terms, the proposed pitch allocations meet the identified residual requirement set out in SSCS Policy H6. SSC has engaged with the owners/occupiers of existing sites, and identified potential sites from a variety of sources, including various calls for sites.

168. Almost 30 potential site options accommodating a total of over 170 Gypsy & Traveller pitches were assessed through a consistent, transparent and robust sequential site selection process [SD6-8; SD21-23; SD29; SD36-38], using the specific criteria set out in SSCS Policy H6 and reflecting the guidance in PPTS (¶ 10-13); all potential sites were also assessed as part of the GBR [SD75], in order to identify those sites with the least harm and conflict with Green Belt purposes. In all but one case, the additional pitches will be provided within the current, well-contained boundaries of the existing Gypsy & Traveller sites. Consequently, there would be no further encroachment into the surrounding countryside or Green Belt, and the impact on openness and Green Belt purposes would be minimal. In two cases, the proposal would make an existing temporary pitch permanent. All the sites are “washed over” by the Green Belt and, earlier in my report, I have already concluded that there is no need to remove any of these sites from the Green Belt, particularly since these are established Gypsy & Traveller sites and given the open character of their surroundings.

169. All the proposed site allocations are deliverable, developable and available, with willing landowners and, in most cases, would meet the known needs of local Gypsy & Traveller families. I also understand that, in the past, all available pitches have been provided and taken up in this district. SSC has addressed all the relevant site-specific considerations, including access, flood risk and the concerns of other bodies, and other development requirements will be addressed at the planning application stage. All sites have been subject to public consultation during the plan preparation process and there have been few site-specific objections to these proposals; any future requests to extend, intensify or amend existing sites could be dealt with through the planning application process. Consequently, no amendments to the site-specific allocations are needed in the interests of soundness.

170. I therefore conclude that the SAD makes adequate provision to meet the Gypsy & Traveller requirements established by SSCS Policy H6 on existing sites which are justified, suitable, available, sustainable, developable and deliverable. Further Gypsy & Traveller provision will be considered in the future, as part of the proposed review of the Local Plan.
Overall conclusions

171. Consequently, with the recommended Main Modifications outlined above, I conclude that all the proposed site allocations are fully justified, suitable and available for the proposed developments, and are sustainable, viable, developable and deliverable within the plan period. SSC has also addressed all the relevant planning considerations and justified the site-specific development requirements. Where Green Belt boundaries are proposed to be amended to release land for development or Safeguarded Land, the necessary exceptional circumstances have been demonstrated.

MATTER 4 – OTHER POLICIES & DEVELOPMENT REQUIREMENTS

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?

172. Section 11 of the SAD sets out policies for the provision of open space, sport, recreation and Green Infrastructure, Hatherton Canal Restoration Project and key Development Requirements.

Open Space Standards

173. Policy SAD7 sets out the standards for open space in new developments, along with Green Infrastructure, allotments and design. It reflects SSCS Core Policy 14 & Policy EQ13 and is informed by an updated Open Space Strategy [SD95], supplemented by an Open Space Topic Paper [SD31]. The open space standards are based on a robust assessment of the required standards within the district, proportionate to the needs of new households. Since the amount of open space within the district is generally good, the additional provision is essentially to meet the needs of new development. Flexibility is provided by ensuring on or off-site provision or contributions to open space, with the ability to consider viability issues and alternative assessments of open space needs provided by developers; the required standards have also been incorporated into the viability study [SD89].

174. As for other open space, allotment provision tends to be demand-led, with needs being identified in consultation with local bodies, such as Parish Councils. Since such provision is only proposed on housing sites where there is local demand, it would not be appropriate to include such provision within the general open space standards. Similarly, since the Woodland Access Standards are aspirational targets set by the Woodland Trust, are not part of national policy, and would not apply to all sites, it would not be appropriate to include these in the open space standards. I also note that the SAD deletes the former SSLP Policy R6 relating to The Bratch, Wombourne, relying instead on SSCS policies to protect this site from inappropriate development; however, the potential of this site to accommodate some limited development can be considered again in the Local Plan review.

175. Consequently, I conclude that the approach to open space standards set out in Policy SAD7 is appropriate, justified, viable, deliverable, flexible and reasonable, consistent with NPPF (¶ 73), and soundly based.
Hatherton Canal Restoration

176. Policy SAD8 sets out the approach to the environmental improvement, protection and restoration of the Hatherton Canal, in line with SSCS Policy EV3. SSC proposes to correct some typographical errors in the policy and text by way of a minor amendment (AM), which needs no endorsement in terms of soundness.

Key Development Requirements

177. Policy SAD9 sets out the key development requirements for the delivery of proposed sites, including design, access, highways, housing mix, historic/natural environment, open space, Green Infrastructure, Sustainable Drainage Systems (SuDS), Natural Resources and Land Stability. It complements the development management policies in the SSCS and provides a framework for the more detailed development requirements set out in the individual site pro-formas. The main issues are whether the requirements are justified or too onerous, and whether they duplicate or are consistent with the SSCS and the latest national policy.

178. Most of the development requirements relate to specific SSCS policies and all have been incorporated into the viability work [SD89]. Most reflect SSC’s Design Guide and Validation Guidance, whilst the access and highways requirements reflect those of SCC as HA, and guidance in the NPPF (¶ 32), PPG [ID: 42/54] and DfT Circular 02/2013. The approach to housing mix reflects SSCS Core Policy 6 & Policies H1, H2 & H4 and NPPF (¶ 50), whilst those relating to the historic/natural environment and mineral resources reflect SSCS Core Policy 3 & Policy EQ3, SCC’s Minerals Local Plan, NPPF (¶ 103/112), and the requirements of prescribed bodies and other statutory consultees. The requirement to provide open space, green infrastructure and SuDS also reflects NPPF (¶ 58/85) and SSCS Policy EQ7.

179. Some representors are concerned that the SSCS policies refer to standards and requirements that are now outdated, superseded or no longer part of national policy (eg. Lifetime Homes and affordable housing thresholds). However, Policy SAD9 refers to “relevant” SSCS policies, which would enable any standards and requirements which do not conform with current national policy to be disregarded or given less weight. Some are also concerned that the requirements for affordable, specialist, elderly and self-build housing, along with education contributions, are too prescriptive, but all reflect key elements of national housing policy. The precise mix of housing on particular sites will be guided by the SHMA and local needs. Some of the required statements and assessments are covered elsewhere in the SAD, SSCS and other documents, but it is helpful to specify them in this general policy to ensure consistency and certainty about development requirements, without being unduly prescriptive or restrictive.

180. However, amendments are needed to the policy wording to clarify the nature of any Transport Assessments/Statements. The requirement for housing mix should be consistent with the latest national policy and guidance and reflect the relevant SSCS policies. Further clarification is needed about the need to provide a heritage statement covering the impact on all heritage assets, whether designated or not, including any required mitigation measures and archaeological issues. Clarification is needed about the context for SuDS and the policy should also clarify the requirement for education contributions, to ensure that they are sought only where they are consistent with the relevant legal and policy tests [MM07]. These recommended modifications ensure that the policy is comprehensive, effective and soundly based, establish a consistent approach to development requirements and avoid unnecessary repetition and duplication in the site pro-formas.
**Overall conclusions**

181. Consequently, with the recommended modifications outlined above, I conclude that the proposed open space standards and key development requirements are fully justified, appropriate, proportionate, effective, deliverable, viable and soundly based, and 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 SSCS.

**Other matters**

**Omission sites**

182. In the representations and during the examination, several potential additional/alternative “omission” sites were put forward by developers, landowners and others. All of these are greenfield sites, most currently within the Green Belt. SSC has assessed all these sites in its site-selection work in a comprehensive, consistent and transparent way, with clear reasons for their rejection. Several participants question some of the assessments, and SSC has updated the information in most cases. Having reviewed all the detailed assessments and evidence about these sites, I consider none perform markedly better than those proposed in the SAD. Moreover, I can find no compelling or conclusive reasons why any of these sites should be allocated at this time, particularly since currently identified development requirements can be met by the proposed site allocations and there is no evidence that the plan is unsound in terms of its selection of the proposed sites. In any event, SSC has confirmed that most of these “omission” sites will be considered again as part of the proposed review of the Local Plan.

183. Other matters were raised in the representations which do not go to the heart of the soundness of the SAD or relate to more detailed matters about specific proposals or planning applications. In response, SSC proposes several minor changes to the wording of the policies and accompanying text as “Additional Modifications” (AM), but these do not directly affect the overall soundness of the Plan and need no endorsement from me. Having considered all the other points made in the representations, including those relating to the Main Modifications, I conclude that no further amendments are needed to ensure that the Plan is legally compliant, sound in terms of the NPPF and associated guidance and consistent with the adopted SSCS.

**Overall Conclusion and Recommendation**

184. The submitted Plan has a number of deficiencies in relation to soundness for the reasons set out above, which mean that I recommend that it is not adopted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.

185. SSC has requested me to recommend Main Modifications to make the Plan sound and legally compliant and capable of adoption. I conclude that with the recommended Main Modifications set out in the attached Appendix, the South Staffordshire Local Plan Site Allocations Document satisfies the requirements of Section 20(5) of the 2004 Act, meets the criteria for soundness in the National Planning Policy Framework.

*Stephen J Pratt*
Inspector

This report is accompanied by an Appendix containing the Main Modifications.