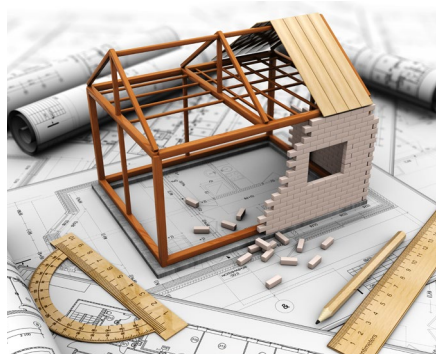
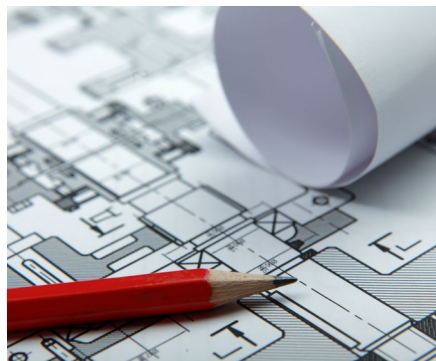




South Staffordshire Council

Local Plan Issues and Options

October 2018



Further information can be found at
www.sstaffs.gov.uk



A New Development Strategy for South Staffordshire 2018-2037

The Local Plan Review

Issues & Options

October 2018

Foreword

Here in South Staffordshire, we are extremely proud of the district's historic and distinctive character, along with the thriving communities sustained by residents who truly care about the places in which they live.

In September 2018, we adopted our Site Allocations Document, allowing land to be released for over 1,000 new homes and more than 60 hectares for employment use. This will provide much needed housing to allow residents to remain in the communities they have grown up in, job opportunities to support them, and space for new and existing businesses to grow and prosper.

In recent years, there has been a significant change nationally in the drive to deliver more homes to meet housing needs, and unfortunately the Site Allocations Document is not delivering enough homes to meet the growing housing need we are now experiencing in the district and the wider region. National policy is absolutely clear that South Staffordshire must play its part in facing these pressures. As part of the Site Allocations Document, we had no choice but to commit to a comprehensive review of the Local Plan to help address these issues, and do so quickly. The challenge therefore comes for us to do this, whilst also balancing the need to protect the Green Belt as far as we can.

However these challenges also bring great opportunities to shape the future of South Staffordshire in a positive way. New sustainable development gives us the chance to build more genuinely affordable homes, provide new or improved local services and facilities, and increase the amount of open space within our villages for residents to enjoy. All of this means we can contribute to the people of South Staffordshire maintaining fulfilling and healthy lives.

Developing the new Local Plan for the district will take a number of years, but I hope that you, as residents, will engage positively with us to help build our communities of the future. This paper is the first stage of this process and we are seeking your views on a range of issues and options for the district. Together, we can work to protect the unique landscape we cherish, whilst also creating vibrant new places, in which we can live, work and play for years to come.

Councillor Robert McCardle
Cabinet Member for Planning and Business Enterprise



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1. Introduction

What is the Local Plan?

- 1.1 All planning authorities have a strategic plan which provides a framework for the future planning of their area. This is known as a Local Plan and it provides the blueprint for future development in the district. South Staffordshire's current adopted Local Plan consists of two documents, which are:
- **Tier 1 - Core Strategy:** adopted in December 2012, this sets out the strategic vision and objectives for South Staffordshire, including the levels of development to take place, and broad locations.
 - **Tier 2 - Site Allocations Document (SAD):** adopted in September 2018, this sets out site specific proposals and policies for the use of land to guide future development, in order to help to deliver the vision and objectives of the Core Strategy.

What is the Local Plan review, and why are we doing a review?

- 1.2 The SAD commits South Staffordshire to carrying out an early review of the Local Plan in order to respond to the increasing need for development, both within South Staffordshire, and in our neighbouring authorities. Agreeing to an early review of the Local Plan was an essential requirement of the Government's Planning Inspector who examined our SAD, and was largely in response to unmet housing needs in both South Staffordshire and the wider region. This means that we have to submit a reviewed Local Plan by 2021, which is earlier than previously anticipated (because the current Local Plan runs until 2028).
- 1.3 The planning system has seen seismic changes in recent years with significant amendments to national planning policy and the requirements of Local Plans, and therefore an early review of the Local Plan is essential to respond to these Government requirements. South Staffordshire Council has no choice but to undertake a review of the Local Plan to review the existing planning policy documents and determine the new Local Plan for South Staffordshire, which will identify the development needed within the district up until 2037. The new Local Plan will need to respond to the changes in planning policy and evidence at the national and regional level since the Core Strategy was adopted in 2012. This includes updates to national planning policy published in July 2018, comprising a new standard approach for calculating our housing need, and a new requirement to work together with neighbouring areas to meet their housing needs where it has been robustly demonstrated that they cannot accommodate their entire housing requirement.

The role of the new Local Plan

- 1.4 The new Local Plan will set out how much development is required in the district up until 2037. This will include residential (including Gypsy, Traveller and Travelling Showpeople accommodation), retail and employment uses. The Local Plan will allocate the sites required to deliver the identified level of development needed.
- 1.5 The existing Local Plan (Core Strategy + SAD) looks forward to 2028 and includes a number of sites which are allocated but have not been developed yet; these allocations will remain. There are also a number of Safeguarded Land sites. This is land that was removed from the

Green Belt in the SAD, and earmarked for consideration to meet some of the development needs in this Local Plan.

- 1.6 The new Local Plan will also set out policies which will guide the determination of planning applications. These policies are likely to cover the same issues as those in the existing Local Plan such as protecting the Green Belt, sustainable development, protecting and providing open spaces, design quality and protecting and enhancing the natural and historic environment. However, consideration will need to be given to what changes have taken place to national policy and how we respond to these locally.
- 1.7 It is important that we have an up-to-date Local Plan and enough land to meet our housing requirements for a rolling 5 year timeframe. Without this, South Staffordshire will be vulnerable to speculative planning applications, resulting in a piecemeal approach to new development and potentially sites that do not relate well to existing settlements.

Will the new Local Plan affect me?

- 1.8 The Local Plan will result in new development. This could be on a settlement hierarchy basis similar to the current adopted strategy; on the outskirts of the district's main villages only and/or near railway stations; as urban extensions from adjoining larger towns; or in a brand new settlement somewhere in the district.
- 1.9 The changes that take place may affect you in a variety of ways. You may be able to see new housing or employment development near to where you live; new facilities may be provided close to you such as new shops, schools or open spaces; new roads or cycle ways could be built to make journeys shorter or easier; and new employers may provide new job opportunities. Planning affects many aspects of our lives and it is important that we get the balance right. If you want to have a say in how much and what type of development takes place and where it goes, then this is the time to get involved.

What happens to the existing Local Plan documents?

- 1.10 The existing Local Plan documents date from 2012 and 2018. Some of the allocations and policies from these documents will be carried forward into the new Local Plan. Whilst the new Local Plan is being developed the existing documents will still be used as the basis for determining planning applications. Once the new Local Plan is adopted it will replace the existing Local Plan.

The plan making process

- 1.11 There are a number of different stages involved in the preparation of a Local Plan with the key stages outlined below:

Main Stages		Date
Evidence Gathering	<ul style="list-style-type: none"> • Identification of main planning issues for the district. • Development of Strategy Options • Call for Sites • SHMA • SA Scoping Report 	2016-present

Issues and Options	<p>WHERE WE ARE NOW</p> <ul style="list-style-type: none"> Public consultation on whether the correct issues have been identified and potential strategies and policies to meet different development needs Additional Call for Sites Initial SA Report 	October 2018
Preferred Options Plan	<ul style="list-style-type: none"> Public consultation on the Council’s proposed draft Plan. Draft SA Report 	Spring 2020
Publication Plan	<ul style="list-style-type: none"> Sets out the final Local Plan for submission to the Secretary of State (SoS)/Government Public consultation on legal compliance and ‘soundness’ Final draft SA Report 	Winter 2020/2021
Submission and Examination	<ul style="list-style-type: none"> Local Plan submitted to Government (Planning Inspectorate) with all the comments received during the Publication Plan consultation Independent Examination carried out in public by a Planning Inspector Final SA Report 	Autumn 2021
Adoption	<ul style="list-style-type: none"> Council formally adopts Local Plan SA Adoption Statement 	Summer 2022
Monitoring and Review	<ul style="list-style-type: none"> Each year, identified targets and planning applications are monitored to assess delivery of the Local Plan 	Ongoing

Table 1: Stages of Plan-making

What is the Issues and Options Paper?

1.12 This Issues and Options consultation is the first stage of the Local Plan review. At this stage, we are looking for your views on whether or not we have identified the right issues facing the district and which of the options are most appropriate for addressing these issues. A variety of options are presented throughout the paper for your consideration. Keep in mind that options are not mutually exclusive and a mixture of options may be most appropriate to deal with certain issues.

Making comments

1.13 Your comments are encouraged and this paper sets out a series of questions to guide responses and which are spread through the document in each section. Policy options are set out in tables under each theme as follows:

Policy options

Table Example:

Option A:
Continue with existing positive policy which supports specialist housing and resists proposals for loss of specialist accommodation.

This would ensure flexibility for types of provision to be provided, but also provides less clarity for developers and landowners on what the Council's expectations are on larger sites...

- 1.14 Questions are also spread through the document and are shown in blue line boxes. **Where you are responding to a question, please explain your answer and where appropriate provide evidence, alternative options or reasoned justification for your response.** This will help us when we analyse the comments. An example of a Question box is given below. A separate list of questions, by theme, is attached as Appendix 1.

Question X:

Which of the above option(s) do you think should be pursued? Are there any other options to consider?

- 1.15 A Glossary (Appendix 2) is included at the back of the document to provide definitions of technical terms.
- 1.16 Following the close of the Issues and Options consultation, all responses will be considered and summarised to inform the preparation of a Preferred Options Paper. Preferred Options is the first draft of the new Local Plan and it will include specific development targets and broad development strategies for accommodating this level of development.

How to respond and next steps

- 1.17 We want as many people as possible to be involved in the preparation of the new Local Plan. Consultation on the Issues and Options Paper will take place until 5pm Friday 30 November 2018. We strongly encourage responses to be made electronically; however, you can submit your comments in any of the following ways:

By e-mail: localplanreview@sstaffs.gov.uk

By post: Strategic Planning Team, Council Offices, Wolverhampton Road, Codsall, South Staffordshire, WV8 1PX

- 1.18 The Strategic Planning Team will host some drop-in sessions during the consultation period where you can come along and speak to us about the Issues and Options Paper and how the Local Plan review might affect you. Details of these sessions can be found on our website.

Data protection

- 1.19 Our legal basis for processing your ordinary personal data will be either that it is necessary to do so to perform a task carried out in the public interest or in the exercise of official authority vested in us. In respect of any special data [health information etc.] processing this is necessary for the purposes of carrying out our obligations in the field of social security and social protection law.
- 1.20 Officers of the Strategic Planning Team and other officers within the council may receive/process your personal data where it is appropriate to do so. For more information about how we process this data see: <https://www.sstaffs.gov.uk/planning/strategic-planning--data-protection.cfm>

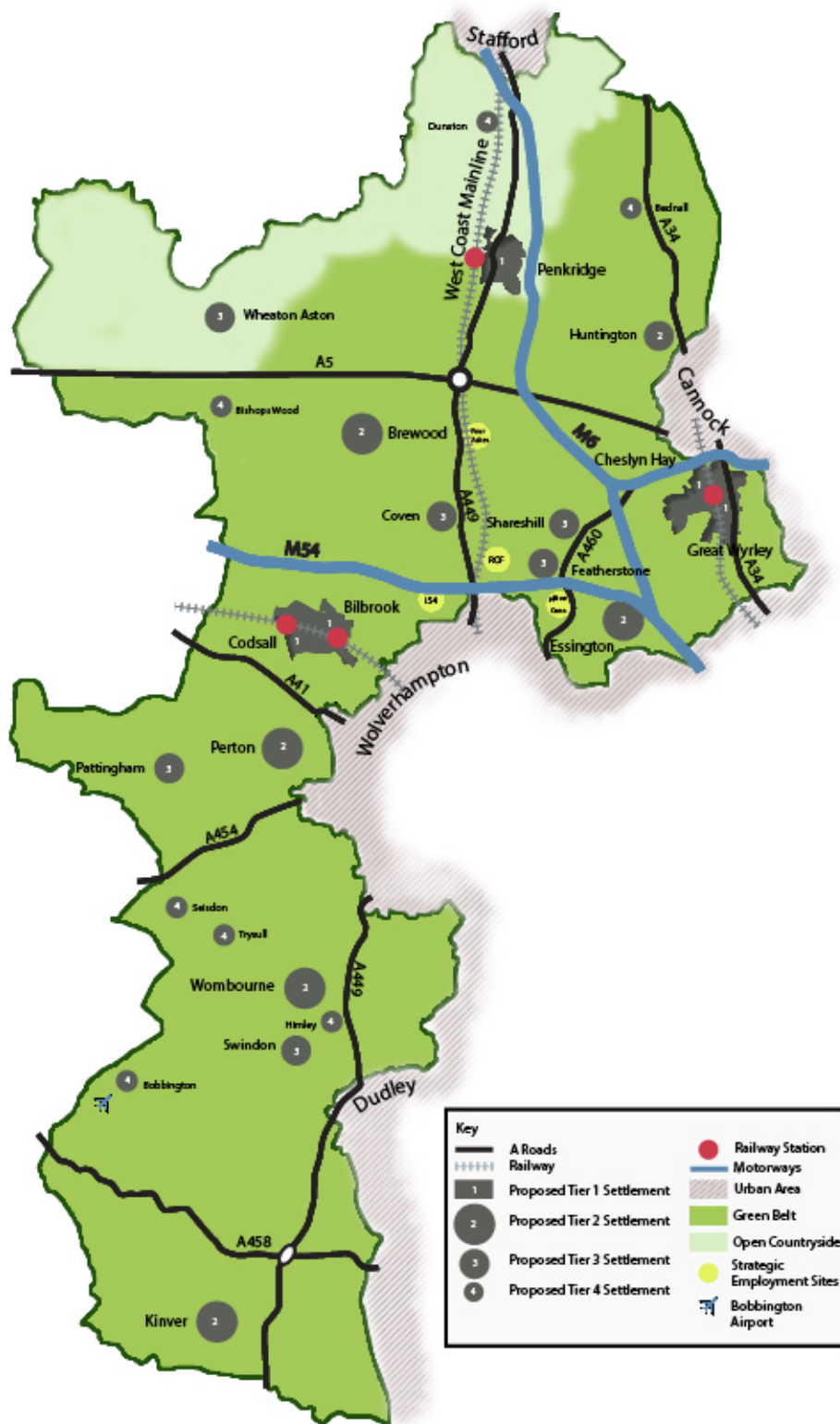
2. South Staffordshire: Setting the scene

- 2.1 South Staffordshire is a rural district on the north western edge of the West Midlands Conurbation. It has an area of 101,000 acres (40,400 hectares) and a population of around 111,200 residents. Much of South Staffordshire (80%) lies within the West Midlands Green Belt (32,089 hectares), with the area beyond the Green Belt to the north west of the district defined as 'Open Countryside'.



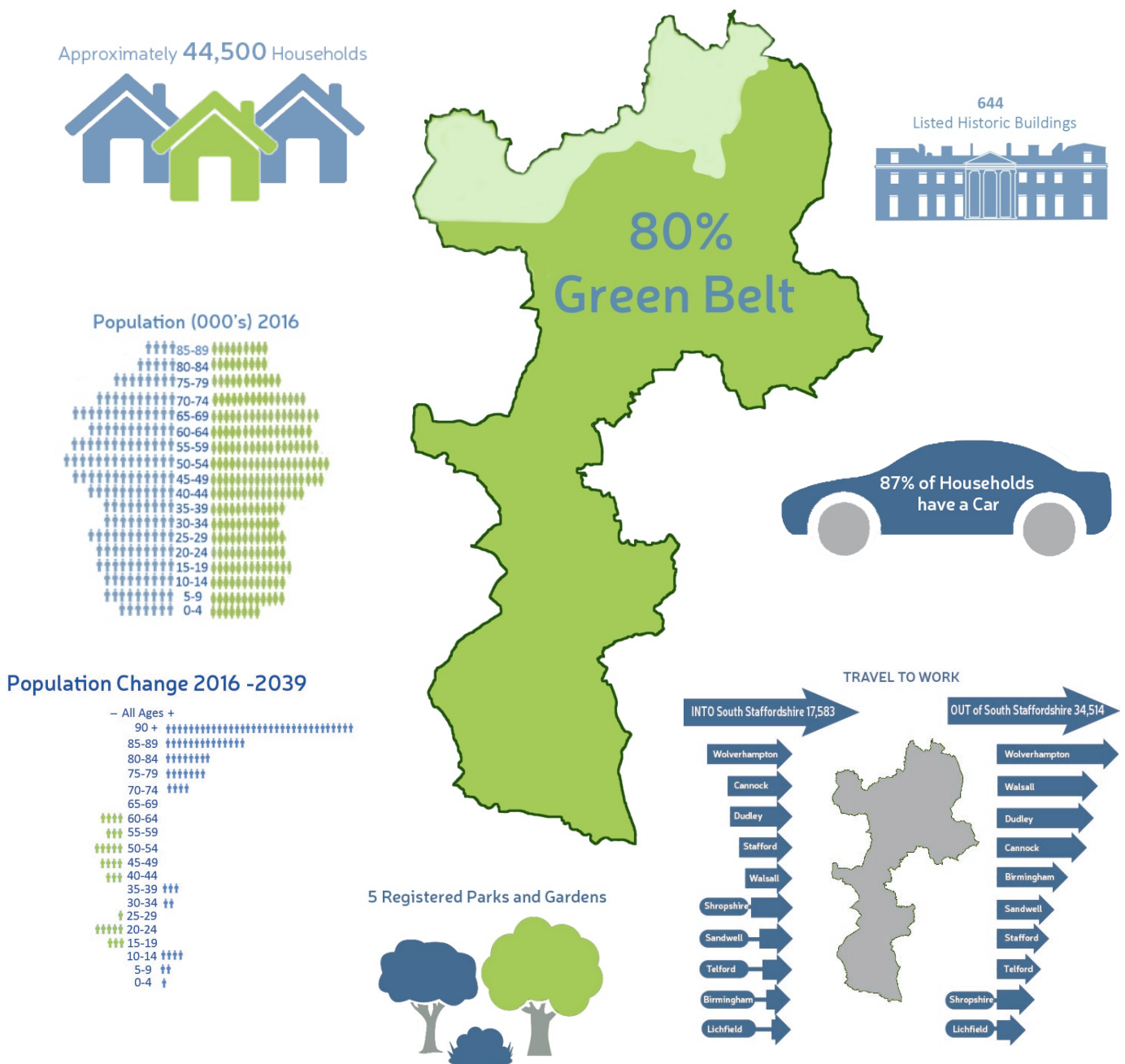
- 2.2 South Staffordshire is the southernmost of the nine Staffordshire authorities in the County. The district adjoins the Major Urban Area of the West Midlands Conurbation and is very close to the Black Country towns of Dudley and Walsall and the City of Wolverhampton. The district also shares its boundaries with Shropshire and Telford to the west and Stafford to the north, with the County of Worcestershire to the south.
- 2.3 South Staffordshire is made up of 27 parishes with a dispersed and diverse settlement pattern of villages ranging from small hamlets to large villages with over 14,000 residents, each with their own distinctive character set in attractive countryside. There is no single dominant settlement.

2.4 Larger villages such as Bilbrook, Brewood, Cheslyn Hay, Codsall, Great Wyrley, Kinver, Penkrudge, Perton and Wombourne contain a wide range of community facilities and services. These include libraries, sport and recreation including leisure centres, shopping, commercial and employment areas and serve the smaller outlying villages and hamlets. However, local residents do rely on the services provided within towns and cities outside of the district to meet some of their higher order needs such as hospitals, certain types of retail needs and employment opportunities.



- 2.5 South Staffordshire has a rich legacy of historic buildings and landscapes with conservation areas, historic parklands and gardens, and buildings of local importance. These define the local identity and distinctive character of the historic environment of the district. The varied landscapes in the district are also home to a rich biodiversity resource providing many types of habitats including areas of international, national and local nature conservation importance.
- 2.6 South Staffordshire has historically proven to be an attractive location for people to live. It has been a destination for people moving from the West Midlands major urban area and other nearby towns. Pressure for housing growth over and above the needs arising purely from within the district has continued.

South Staffordshire – key statistics



3. What does the Local Plan need to consider?

National context

National requirements for plan-making

- 3.1 National policy requires that a plan is produced which addresses the strategic priorities for the area. South Staffordshire is not within a Combined Authority area (or under the remit of an elected Mayor) and therefore strategic planning is the responsibility of the local planning authority. The strategic priorities for South Staffordshire will be set out in the Local Plan, which along with any potential neighbourhood plans will form the Development Plan for the area.
- 3.2 The strategic policies for an area should include policies and site allocations to address key issues such as:
- an overall strategy for growth
 - housing (including affordable housing)
 - commercial development
 - retail and leisure
 - infrastructure
 - community facilities
 - climate change
 - conservation and enhancement of the natural and built environment
- 3.3 Plans should be clear in identifying strategic policies. They should form a starting point for local policies which include more detailed development management policies for issues such as design. Strategic policies should include a clear spatial strategy for bringing forward enough land to address housing needs over the plan period and be underpinned by relevant and up to date evidence. It is now a legal requirement to have completed a review of the Local Plan within 5 years of its adoption to take account of changing circumstances affecting the area. Details of proposed strategic policies can be found in Chapter 10.
- 3.4 The National Planning Policy Framework (NPPF) sets out that Local Plans should be prepared in line with procedural and legal requirements and will be assessed on whether they are considered 'sound'. Plans are considered sound if they are: positively prepared, justified, effective, and consistent with national policy.

Neighbourhood planning

- 3.5 South Staffordshire does not currently have any neighbourhood plans in its area; however this is something which is being supported through national policy. The role of neighbourhood plans is to promote a shared vision and identify local policies for the neighbourhood area, rather than strategic policies. Crucially, neighbourhood plans must be in general conformity with the area's strategic policies and should not provide for less development than is set out in the Local Plan. Where a neighbourhood plan has been produced, then the local policies in it would take precedence over the local policies in the Local Plan if the neighbourhood plan has been adopted more recently.

Cross boundary Issues and the Duty to Cooperate

- 3.6 Local Planning Authorities have a duty to cooperate with neighbouring authorities and other prescribed bodies on strategic matters that cross administrative boundaries. Strategic matters can include housing, employment, infrastructure and the Green Belt. The Council has been working collaboratively with neighbouring authorities on cross boundary issues for a number of years. A clear example of this is the role employment allocations in the Site Allocations Document (SAD) play in meeting some of the Black Country employment needs. Unmet housing need across the Greater Birmingham Housing Market Area (GBHMA) is a key cross boundary issue that will need to be addressed with neighbouring authorities (including South Staffordshire’s role in meeting a proportion of the shortfall) through plan preparation. Cross boundary working on this issue is ongoing, including the commissioning of a joint Green Belt review that will cover the Black Country and South Staffordshire.
- 3.7 Recent changes to the NPPF presumption in favour of sustainable development have made it explicit that authorities should plan for their own objectively assessed needs for housing and other development, as well as any needs that cannot be met in neighbouring areas. Agreement through Statements of Common Ground are now a necessity and will document the cross boundary matters that need to be addressed and what progress has been made in dealing with them. These should be publicly available throughout the plan making process.

Issues and challenges for South Staffordshire

- 3.8 Community engagement through the current Local Plan identified a number of key issues and challenges in South Staffordshire which should be addressed by the Local Plan, many of which we consider are still relevant in this Local Plan review. These are outlined in the table below:

Strengths	Weaknesses
<ul style="list-style-type: none"> • Natural assets including natural green spaces, parks and gardens and designated wildlife sites • Built assets including attractive characterful villages, listed buildings, conservation areas and tourist attractions • Very well served (particularly in the North) by national railway and highway transport corridors, with good access to nearby major conurbations. • Low levels of unemployment • High life expectancy for residents 	<ul style="list-style-type: none"> • Demographic imbalance with higher than average proportion of residents aged 65+, and a projected decline in families and working age residents, with resultant threat to some service provision • Reliance on neighbouring areas for higher order services and a dependency on their economic health for access to employment
Opportunities	Threats
<ul style="list-style-type: none"> • Continue development of the strategic employment sites including at i54 South Staffordshire and ROF Featherstone leading to greater inward investment and prosperity • Plan positively to meet future housing needs in a way that improves infrastructure, services and facilities for existing households 	<ul style="list-style-type: none"> • Increasing pressure for development on land within the Green Belt to meet our own housing needs and the needs of adjoining areas, which if not properly managed, could threaten the quality and character of the district • Lack of available brownfield land in the district

<ul style="list-style-type: none"> • Build on the tourism offer of the built and natural environment 	<ul style="list-style-type: none"> • West Midland Interchange (WMI) strategic rail freight interchange poses a threat to the district if permitted – in terms of the environmental impact and potential for increased pressure on infrastructure and for additional housing
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Table 2: SWOT

Question 1:

Are there any other strengths, weaknesses, opportunities and threats to South Staffordshire that you feel should be identified in the Local Plan? If yes, then please provide details.

Should anything be deleted?

We think the key issues and challenges that will drive change in the district, and which the Local Plan should seek to address, are summarised below.

Homes and Communities - Issues and Challenges

3.9 Levels of growth needed to meet South Staffordshire’s housing needs and pressure to release land to meet housing needs from adjoining areas.

- South Staffordshire is in a geographically large and diverse Housing Market Area (HMA) known as the Greater Birmingham HMA (GBHMA), comprising fourteen local authorities including Birmingham and the four Black Country authorities.
- The Government recently introduced a standard methodology for all authorities to calculate their housing needs. Using this methodology, local authorities must first determine their own objectively assessed housing need (OAN). The OAN is the minimum number of homes needed, including affordable housing and the housing needs of specific groups. For South Staffordshire this identified a need for **270 dwellings per annum** (see Chapter 4 for this calculation).
- As part of the Duty to Cooperate, local authorities should also look to provide additional homes to meet unmet needs from neighbouring areas at an appropriate level agreed through a Statement of Common Ground. Statements of Common Ground should be agreed over the most appropriate functional geography; for South Staffordshire, the existing evidence suggests this is the GBHMA.
- The next step is to test whether policies need to be put in place to restrict the levels of development that can be accommodated in certain locations. When assessing the role South Staffordshire can play in meeting some of the unmet need from neighbouring authorities this needs to be considered in the context of protecting the Green Belt and distinctive character of the district, as well as ensuring that there is adequate infrastructure to support the proposed level of growth.
- Pressure to meet housing needs from within the district and adjoining areas means that different development strategies and locations for growth need to be explored and

tested through the Local Plan review. This is considered in more detail in Chapter 4. Pressure on South Staffordshire to release land for housing outside the Green Belt will be particularly acute.

3.10 Levels of growth needed to meet South Staffordshire’s Gypsy and Traveller needs.

- The need to provide additional Gypsy and Traveller pitches is set out in the latest evidence of housing needs. Historically, the location of existing Gypsy and Traveller sites in South Staffordshire was established through the planning application process. Sites are often in rural locations, and a large proportion of sites are concentrated relatively close to the strategic transport network in the north of the district. Existing sites are located in the Green Belt and are privately owned. There continues to be no appetite for new public sites, with a clear preference from the existing community for permanent residential pitches.
- Previous planning policy requirements have established the need for future pitches on a ‘need where need arises’ approach, with new pitch locations identified through engagement with existing families. This was the approach taken for allocating sites through the current Local Plan, with all allocations representing an intensification of existing sites to meet an existing identified family need.
- A recent change to the definition of travellers in national planning policy confirms that families who have ceased travelling no longer fall under the policy requirements. The principal issues in relation to meeting the needs of the Gypsy and Traveller community therefore are delivering new pitches in the right places for the right people, having regard to existing sites and family need, whilst recognising the constraints that impact upon the district.

3.11 Delivering a variety of homes, to meet the needs of all groups of the community and better balance the local housing market.

- Evidence suggests there is a mismatch between the district’s existing housing stock and future housing needs. Where smaller residential units are provided for young families and for the elderly who wish to downsize, it frees up family sized accommodation elsewhere in the community.
- The Council has jointly commissioned a Strategic Housing Market Assessment (SHMA) with the Black Country that considers the type of housing and mix of tenures that the population is likely to need in the future. This will guide policies to support an appropriate mix of both market and affordable housing.

3.12 Meeting the housing needs of the ageing population and providing specialist housing.

- The district has an increasingly ageing population. This is considerably higher than the national average. There is a concern that the expected changes in the population structure will have an impact on the social mix and balance of the population in some of the villages in the district. Meeting the needs of the elderly population including the development of new and improved services, and the provision of the right mix of specialist housing, including bungalows, will be a major challenge.

- The Local Plan will also need to consider the specialist housing requirements of other groups such as those with disabilities and mental health disorders.

3.13 Delivering affordable housing to meet local needs.

- South Staffordshire has seen rapid housing expansion in recent years as its villages have proved attractive to people prepared to travel to work in nearby major urban areas. As a result of this trend, house prices in South Staffordshire have increased and the ratio of house prices to incomes is high in regional terms. Maintaining an adequate and suitable supply of affordable housing for people on low incomes and first time buyers presents a particular challenge.
- Currently, a significant proportion of affordable housing is delivered through developer contributions secured via a Section 106 Agreement. A review of the Council's rural exceptions site policy for 100% affordable housing schemes, as well as the potential for entry level exceptions schemes will be a key issue for the Local Plan to consider. These can also play an important role in sustaining services, such as local schools, in smaller rural communities.

3.14 Delivering decent homes of a high-quality design that reflect and maintain the local distinctiveness, character and quality of the countryside and villages in South Staffordshire.

- Providing a variety of well-designed homes is important, not only to meet a variety of housing needs, but also to maintain local character and distinctiveness. This includes working positively with a variety of small and large scale house builders, meeting the need for Self and Custom Build Housing, as well as working with Registered Providers (RP) and adopting a flexible approach to conversions and re-allocation of undelivered sites.
- Good design goes beyond aesthetics and can have far-reaching benefits. Cost effective design measures can be undertaken to create well designed, energy efficient homes, with appropriate levels of internal and external space, leading to wider health and wellbeing benefits for residents.

3.15 Ensuring access to a good range of health services, as well as sport, leisure and recreational facilities, making a positive contribution to the health and wellbeing of residents.

- Obesity affects parts of the district and only just over half of South Staffordshire adults meet the recommended levels of physical activity. One in four South Staffordshire adults is physically inactive, which is similar to the national average. Healthy lifestyles, including healthy eating and exercise, should be encouraged and planning has an important role in creating an environment that facilitates these lifestyle changes.
- Sport, leisure and recreational facilities should be accessible to residents but also of suitable quality to be attractive to users. Provision for cycling and walking as recreation activities should also be encouraged; this is an important aspect of creating healthy communities.

3.16 Meeting the needs of children and young people, including the provision of good education and play spaces.

- Providing play provision as part of a green infrastructure network for residents with children, including natural play, has clear health and wellbeing benefits. Therefore ensuring that new developments incorporate these and that existing communities can access them is an issue for the Local Plan to consider.
- Both two and three-tier education systems operate in South Staffordshire, and there are currently 36 primary/first schools, 5 middle schools, and 6 high schools in the district. South Staffordshire College at Rodbaston near Penkridge is the district's only higher education institution, providing education and training in land based, farm and rural industries. Education attainment in South Staffordshire for GCSEs is similar to the England average; however inequalities in attainment levels exist within the district. Ensuring there is adequate school provision to accommodate increased pupil numbers as a result of new development is a key challenge.

3.17 The reduction of crime and anti-social behaviour and people's fear of crime.

- Planning for new developments should include measures that help limit crime and deter anti-social behaviour. Promotion of natural surveillance and a feeling of security for residents should be promoted.

Economic Issues and Challenges

3.18 Levels and types of growth needed to meet South Staffordshire's employment land needs and ensuring that local people have good access to a range of employment opportunities.

- Overall, the district is an attractive location for industrial development with a diverse range of small businesses as well as medium and large firms. A key challenge is not simply to allocate enough employment land, but to provide a mixed portfolio of employment land in terms of quality, size and use classes. Retaining existing businesses, diversifying the economy, creating more skilled jobs and increasing the retention of young educated residents are all issues to be addressed in order to strengthen the local economy and see local people have access to a range of employment opportunities.
- The Council's latest evidence on employment land requirements (EDNA stage 1, 2018) has found that the district has sufficient supply of available employment land to meet our own employment requirements over the plan period to 2037, with around a 20ha surplus. Notwithstanding this surplus, it is acknowledged that South Staffordshire may have a role in meeting cross boundary employment needs as discussed at paragraph 3.19 below.

3.19 Supporting the economies of adjoining areas and pressure to release land to meet a proportion of their unmet employment needs.

- A significant proportion of South Staffordshire's working population travels to work outside the district. The Black Country economy, and those of other adjoining authorities, is an important source of jobs for the residents of South Staffordshire and is an important factor in the prosperity of the district. Over recent years, South Staffordshire has aspired to provide more jobs locally, reduce levels of out commuting, and provide employment for residents of neighbouring areas, such as at i54 South Staffordshire. The economic inter-relationship between South Staffordshire and the

Black Country is particularly strong with a key challenge to ensure that future cross boundary employment provision is mutually beneficial.

- In line with the national guidance requirements, South Staffordshire's EDNA (stage 1) has undertaken an analysis of South Staffordshire's Functional Economic Market Area (FEMA) and has identified South Staffordshire as being in the same FEMA as Cannock Chase district, Dudley, Walsall and Wolverhampton. The Black Country authorities acknowledge that they have a significant unmet need for employment land for their forthcoming plan period. They are undertaking further evidence gathering to see if they can reduce this gap (including further assessment of their urban capacity and a Green Belt Review), however it is acknowledged that three of the Black Country authorities are in the same FEMA as South Staffordshire, and therefore we may have a role in meeting some of their unmet employment land needs.

3.20 Supporting the aims and ambitions of the Staffordshire and Stoke-on-Trent Local Enterprise Partnership (SSLEP).

- This includes expansion in large and small businesses in a number of priority sectors. It incorporates the development of advanced manufacturing industries in the aerospace and automobile sectors and capitalising on the supply chain opportunities emerging from global businesses such as Jaguar Land Rover.

3.21 Understanding the outcome of the West Midlands Interchange (WMI) proposal if permitted.

- This includes potential impacts on the local environment, as well as impact on infrastructure and housing requirements. If permitted, the scheme would increase the number of people coming into the district for work and therefore using the infrastructure network; or coming into the district to live, therefore increasing the pressure for additional housing.

3.22 Supporting our existing employment sites, including strategic employment sites at i54 South Staffordshire, ROF Featherstone, Hilton Cross and Four Ashes.

- The delivery of strategic employment sites provides important job opportunities for residents of South Staffordshire and for people from neighbouring areas. It is important that these are safeguarded and that inward investment opportunities are fully harnessed, including exploring opportunities for their further expansion where this is justified.

3.23 Supporting higher education attainment, the development of skills and access to training and employment opportunities.

- South Staffordshire is relatively prosperous with the number of those employed within the top 3 professional and managerial sectors exceeding the national average. The number of adults with no qualifications is also below the national average. There are however pockets of deprivation in the district with higher levels of unemployment. Supporting the development of skills, plus access to education and local training opportunities is a key issue for the Local Plan, to ensure that residents can benefit from economic growth.

3.24 Providing opportunities for sustainable rural economic growth whilst protecting the environment, including supporting farm diversification and tourism.

- There is increasing recognition of the need to diversify the rural economy whilst enabling farmers to continue managing the rural landscape. Farm complexes, with a range of different sized buildings, can offer scope for alternative employment uses that support the rural economy, including tourism, in preference to other uses which may be less sustainable, such as conversions to residential uses. The re-use of rural buildings for employment uses could provide opportunities for residents to gain employment locally, reducing the need to travel.
- There is also a need to proactively support and encourage the improvement of tourist facilities and attractions and promote South Staffordshire as a place to visit; particularly as a base from which to access a wide range of different tourist attractions within the West Midlands Region and beyond.

3.25 Ensuring local people have access to retail and a good range of essential community facilities and services, supporting the continued role of village and neighbourhood centres as a focus for delivery of these.

- The larger villages in South Staffordshire contain a range of community facilities and services including retail centres, libraries, sport and recreation and serve the smaller outlying villages and hamlets. However, local residents do rely on the services provided within towns and cities outside of the district to meet some of their higher order needs too. In the smaller villages, the loss of facilities and services in villages appears to be an ongoing trend and is of particular concern. Protecting village shops and community facilities and providing accessible services to meet the needs of all sectors of the community are key priorities.

3.26 Preparing a Masterplan to guide future development of Wolverhampton Halfpenny Green Airport.

- The airport is located wholly in the Green Belt and provides general aviation including business and recreational flying. The Council has a long-term aspiration to work with the airport owners to prepare an Airport Masterplan to guide its future development. This has not come forward to date, due in part, to changing ownership.

3.27 Ensuring impact on the road network is fully considered during plan-making including understanding the outcomes of the M6/M6(Toll)/M54 link road proposal.

- It is important when considering growth options to ensure that impact on the road network is fully considered and that proposals limit the impact on the network as far as possible.
- The M6, M6 Toll and the M54 run through the district giving access to the Midlands motorway network and beyond. There are proposals for a new M6/M54/M6(Toll) link road from Junction 1 M54 to Junction 11 M6, however as yet no definitive route proposal has been identified.

3.28 Ensuring provision of suitable public transport services with appropriate facilities (such as adequate parking) at transport hubs and to serve village centres.

- South Staffordshire benefits from good proximity to strategic road and rail links, particularly in the north, connecting the district to the West Midlands and other parts of the country, which makes it attractive for commuters and creates pressure for more housing and employment. The national West Coast Main Line railway runs through the district with a station at Penkridge. Rail services are also provided on the Shrewsbury to Wolverhampton line, with railway stations at Codsall and Bilbrook; and the Walsall to Rugeley lines with a station at Landywood (Great Wyrley). These stations provide excellent links for villages with towns and cities regionally and nationally. Car and/or bicycle parking at all of these stations remains a challenge, as commuters (including residents from within the villages and those from further afield) park on surrounding residential roads. Parking can also be an issue in some village centres for residents accessing shops and other services.
- Public transport is patchy across the district and transport links between the north and south are particularly poor. There is a high level of car ownership, however improving access to public and community transport for those without a car remains an issue. Improving facilities for pedestrians and cyclists is also critical. A high quality and effective rural public transport service is essential to ensure people have access to facilities and services within the district and access to employment opportunities and key service centres outside the district.

3.29 Improving access to suitable broadband and digital communication networks.

- Access to digital networks and high-speed broadband remains inconsistent. Home working is becoming an increasing feature in rural areas and the expansion of broadband internet and other technologies are needed to support sustainable forms of employment. This will also help encourage the development of small and medium sized enterprises (SMEs) in the district.

Natural and Built Environment - Issues and Challenges

3.30 Protecting the Green Belt and understanding which areas of South Staffordshire's Green Belt make the most contribution to the purposes of Green Belt policy.

- Around 80% of South Staffordshire is designated Green Belt. Faced with strong pressure for development, the Green Belt plays a fundamental role in maintaining the current pattern of villages and the distinctive character of the district. Green Belt policy is a planning function, separate from landscape or other environmental protection with 5 specific purposes. Purposes include protection against encroachment from adjoining Major Urban Areas, and the coalescence of settlements in order to retain the attractive character and rural setting of settlements and to maintain its openness.
- When planning to meet their housing needs, authorities should direct development away from Green Belt where possible, or where this is unavoidable, should look to locate development away from the most sensitive areas of Green Belt subject to other sustainability and deliverability considerations. Therefore, carrying out a review of which areas of South Staffordshire's Green Belt make the most contribution to the purposes of Green Belt policy will also be a critical issue to be addressed.

3.31 Protecting sensitive areas of Open Countryside beyond the Green Belt.

- Around 14% of the district is identified as Open Countryside. Much of the character of the countryside beyond the Green Belt is of high landscape quality with some areas of ecological, historical, archaeological, agricultural and recreational value. Protecting the most sensitive areas of the Open Countryside is therefore a key issue.

3.32 Understanding South Staffordshire’s landscape character and areas sensitive to change.

- The landscape character of South Staffordshire is varied and the predominant landscape structure has changed significantly over the centuries. Many trees and hedgerows have been removed through agricultural activity and mineral extraction. Substantial areas of lowland heath have given way to forestry and woodland. Post-World War II population booms have resulted in significant development in South Staffordshire, which has affected the character of the landscape. Understanding the landscape character and, where possible, protecting the most sensitive areas is therefore a key issue for the Local Plan.

3.33 Protecting, conserving and enhancing the district's rich natural environment and ecological and assets.

- The varied landscape in the district is also home to a rich biodiversity resource providing many types of habitats including Special Areas of Conservation (SACs), National Nature Reserve (NNR), Local Nature Reserves (LNRs), Sites of Biological Importance (SBIs), and Sites of Special Scientific Interest (SSSIs). There are also important areas of lowland heath such as Shoal Hill Common in Cannock Chase Area of Outstanding Natural Beauty (AONB). The western fringe of the Cannock Chase AONB lies within the district and is valued for its high landscape quality, wildlife and recreational value, and there is a statutory obligation to protect and manage the area. Within the AONB lies an area of lowland heath which is protected further by Special Area of Conservation (SAC) status.
- The agricultural land within the district ranges from the best quality grade 1 down to grade 3b. The best and most versatile agricultural land is classified as grades 1 and 2. Conserving and protecting valued finite natural resources is a key issue to consider when planning new development.

3.34 Ensuring sufficient good quality public open spaces and green infrastructure is available for residents and visitors to the district.

- There are extensive areas of attractive open land for public recreational use, such as Cannock Chase, Shoal Hill Common, Kinver Edge, Highgate Common, Baggeridge Country Park, South Staffordshire Railway Walk, the Wom Brook Walk, Barnfield Sandbeds and the Wyrley Essington Canal Linear Walk. These public open spaces provide informal leisure opportunities as well as enjoyment of the natural environment. Conserving and protecting open spaces and recreation areas for their own sake and for use by generations to come remains a key challenge to be addressed.

3.35 Protecting and conserving the district’s historic assets.

- There are over 640 listed buildings and 19 Conservation areas (including 16 village conservation areas) together with many other locally important buildings and structures. The district’s archaeological resource is also rich and varied and includes scheduled ancient monuments such as clusters of Roman camps and non-designated sites. Ensuring development is sensitive to these irreplaceable assets and their setting, and that appropriate mitigation is provided where harm is unavoidable, are key challenges.

3.36 Planning for the impact of climate change, and protecting existing and new communities from flood risk through flood resilience measures.

- Ensuring new development is sustainable, addressing the implications of climate change and the reduction of CO₂ emissions, encouraging renewable energy and the promotion of energy efficiency will be major challenges.
- South Staffordshire is covered by two river catchments: Smestow Brook is within the River Severn catchment; and the River Penk is within the Trent catchment. Many additional tributaries flow into the main rivers contributing to the flood risk within the district. Penkridge, Wombourne and Kinver, with a number of other settlements, are known to be affected by fluvial flooding.
- Surface water flooding is also an issue in certain hotspots, with the Lead Local Flood Authority identifying Brewood as one of the top 10 ‘rural’ areas and Perton as one of the top 10 ‘urban’ areas with properties at risk from surface water and small watercourses in Staffordshire. It is therefore a key challenge to ensure that future growth does not exacerbate these issues, and where possible, contributes towards a reduction in flood risk.

Question 2:

**Are there any other issues that the Local Plan can address in South Staffordshire?
Are the issues and challenges appropriate and sufficient to inform the Local Plan?
If not, what should be added or deleted?**

Vision and objectives

- 3.37 Based on the issues and challenges outlined above, it is crucial that the Local Plan sets out a vision for the district to cover the plan period (2018-2037) and identifies clear objectives for aspects such as housing, infrastructure, economic growth and environmental protection. Collectively, the policies in the plan should support the objectives to deliver the vision and strategic priorities for the district.

The vision - what will South Staffordshire be like in 2037?

South Staffordshire will strive to protect & enhance its distinctive character, communities, and landscape, whilst creating beautiful and thriving new places in which people can live, work, and play.

3.38 Strategic objectives - to deliver the vision

Social

- 1) To provide a good range of market and affordable housing of varying sizes including housing that meets the needs of an ageing population.
- 2) To develop a built environment that respects the character of our existing settlements and reflects local vernacular so to create places where people want to live, work and play.
- 3) To encourage healthy communities through the provision of good access to green infrastructure, sport and leisure, children's play and youth development facilities.
- 4) To create sustainable village centres enabling good access to community infrastructure including education, health and leisure facilities, retail and community services.
- 5) Maximise community cohesion and safety by ensuring that new developments are designed to support crime reduction.

Economic

- 6) Develop an economic strategy that fosters sustainable economic growth and encourages inward investment and job creation in key sectors such as research and design and advanced manufacturing; providing the skills to enable local residents to access these jobs
- 7) Support the vitality of rural areas by enabling the sustainable growth and diversification of local businesses
- 8) Support the development of sustainable transport network including ensuring that where possible existing and new development is well served by various public transport modes
- 9) Ensure that new development is served by appropriate physical infrastructure including parking and road improvements where robust evidence demonstrates network capacity issues.

Environmental

- 10) Protect the Green Belt as far as possible ensuring that where Green Belt release is necessary that compensatory improvements to the environmental quality and accessibility of remaining Green Belt, including improving access to the countryside and ecological and biodiversity enhancement, are made.
- 11) Safeguard and enhance the district’s landscape character, green infrastructure and natural environment
- 12) Enhance the built environment including conserving and enhancing district’s heritage assets.
- 13) Ensure that our communities are resilient to the effects of climate change ensuring development does not increase the risk of flooding to new and existing properties and provide opportunities from renewable or low carbon energy supply systems.

Question 3:

Do you have any comments on the vision, and objectives to deliver the vision set out above? If yes, then please provide details.

Evidence base

3.39 The new Local Plan must be based on a wide variety of up to date and robust evidence, providing technical information specific to South Staffordshire. The following list sets out the range of studies which will be or have been prepared, and some of these studies will be updates to work undertaken for the existing planning policy documents. Once completed, evidence base studies will be available on the Council's website and there will be an opportunity to provide representations on the evidence base at each stage of public consultation during preparation of the Local Plan.

Evidence	Programming
Stoke on Trent and Staffordshire LEP Strategic Economic Plan (SEP)	Published March 2014 - to inform Issues and Options
West Midland Strategic Employment Sites Study (Stage 1)	Stage 1 published 2015
Gypsy, Traveller and Travelling Showpeople Accommodation Assessment	Published 2017 – to inform Issues and Options
Strategic Housing Market Assessment (SHMA)	Published 2017 – to inform Issues and Options
Housing Strategy	Adopted March 2018 – to inform Issues and Options
Economic Development Needs Assessment (Stage 1)	Published October 2018 - to inform Issues and Options
Habitats Regulation Assessment (HRA)	Initial HRA published October 2018. Subsequent updates to the HRA to be published alongside each Local Plan consultation document
Infrastructure Delivery Plan (IDP)	Initial IDP published October 2018.

	Subsequent updates to the IDP to be published alongside each Local Plan consultation document
Rural Services and Facilities Audit	Published October 2018 – to inform Issues and Options/Preferred Options
Sustainability Appraisal (SA) including Strategic Environmental Assessment (SEA)	Scoping Report and Initial SA published October 2018. Subsequent updates to the SA to be published alongside each Local Plan consultation document
Black Country and South Staffordshire Green Belt Review (including Landscape sensitivity and capacity study)	Commissioned September 2018. To be published early 2019 – to inform Preferred Options
West Midland Strategic Employment Sites Study (Stage 2)	2018/2019 - to inform Preferred Options
Cannock Chase Special Area of Conservation (SAC) Evidence Base Studies (including review of mitigation measures and visitor survey)	2019 – to inform Preferred Options
Ecological Network Study	2019 – to inform Preferred Options
Extensive Urban Surveys, Conservation Area Appraisals and Conservation Area Management Plans	2019 – to inform Preferred Options
Green Infrastructure Strategy	2019 – to inform Preferred Options
Historic Environment Site Assessment (HESA)	2019 – to inform Preferred Options
Open Space, Sport and Recreation Audit and Strategies	2019 – to inform Preferred Options
Retail capacity and town centre uses study	2019 - to inform Preferred Options
Strategic Flood Risk Assessment (SFRA) and Water Cycle Strategy	2019 – to inform Preferred Options
Transport Impacts (with Staffordshire County Council)	2019 - to inform Preferred Options
Viability Assessment of the plan's policies and site allocations	2019 – to inform Preferred Options

Table 3: Evidence Base

Question 4:

Do you think that the key evidence set out in Table 3 is sufficient to support the preparation of the Local Plan review? If not, what additional evidence is required?

3.40 A number of the studies listed in the table above will sit alongside the Local Plan, and therefore will be updated and consulted on at each stage of plan preparation. These are discussed in further detail below.

Sustainability Appraisal (SA)

- 3.41 The Local Plan must contribute to achieving sustainable development, aiming to achieve a better quality of life for all, now and for future generations. A Sustainability Appraisal (SA) is a statutory requirement which ensures that the environmental, social and economic effects of a plan and reasonable alternatives to the plan are being considered. Preparing an SA is an iterative process and therefore a separate SA will be prepared to appraise proposals at each stage of Local Plan consultation (see Chapter 1, Table 1), and will also be subject to consultation. The SA will assess the sustainability of the strategic approach, the site selection process, and the content of the policies contained in the plan. The SA findings will then be used to help refine policy choices and site options through to the final proposals set out in the Submission Local Plan.
- 3.42 As a first step, a Sustainability Appraisal Scoping Report was prepared and was made available for consultation with key stakeholders Historic England, Natural England and the Environment Agency to establish the range of issues to be covered in the sustainability appraisal, develop the sustainability appraisal framework and identify the key sustainability issues that are relevant to the new Local Plan. This consultation took place for 5 weeks in November/December 2017. The comments received have now been incorporated into a Revised SA Scoping Report and this is available on the Council's website for information.
- 3.43 The initial SA has been produced to appraise the policy options set out in this paper against the sustainability objectives. It highlights the social, economic and environmental impacts that are likely to arise from each plan option. The findings will help refine policy and site options to be included in the Preferred Options Paper.

Habitats Regulation Assessment (HRA)

- 3.44 The Habitats Directive establishes an ecological network of European Sites (Natura 2000 Network) and requires consideration of whether or not an Appropriate Assessment needs to be undertaken during the preparation of a Local Plan. The purpose is to assess what effects, if any, the plan might have on European sites. A Habitats Regulations Assessment (HRA) will be undertaken as required by Regulation 61 of the Conservation of Habitats and Species Regulations 2010 (as amended) in order to see whether the plan could have the potential to result in likely significant effects upon European sites and sites of international importance for nature conservation.
- 3.45 Motte Meadows SAC near Wheaton Aston is located entirely within South Staffordshire. There are also two international sites in close proximity to the district boundary; Cannock Chase SAC and Cannock Extension Canal SAC which the Council must consider when preparing any plans or proposals, to ensure they have no adverse impact on these sites.
- 3.46 A separate suite of joint studies are being updated with adjoining authorities in relation to Cannock Chase SAC to underpin the Local Plan review. Further information on the HRA process and the mitigation required for Cannock Chase SAC, can be found in the HRA documentation and on our website.
- 3.47 If you wish to view the SA or HRA, or would like further information, please visit our website at www.sstaffs.gov.uk/localplans.

Infrastructure Delivery Plan

- 3.48 A refreshed infrastructure Delivery Plan (IDP) will be prepared to support the new Local Plan to ensure the required infrastructure and investment needed to deliver the plan effectively is identified. The IDP will include the specific infrastructure projects needed to deliver planned growth and will be updated as the plan progresses, following consultation with infrastructure providers, residents and Members. An initial IDP (October 2018) has been produced that identifies the district's 'baseline' infrastructure requirements including:
- A summary of current infrastructure provision
 - Infrastructure projects underway or scheduled
 - Known infrastructure deficiencies
- 3.49 Alongside this, the Council will explore if there is scope to introduce a Community Infrastructure Levy (CIL) that would see a form of 'roof tax' charged on certain types and sizes of new development, with monies collected this way used for new infrastructure projects. The Council's decision on whether to implement a CIL charge will be informed by the Viability Study. This will determine the level of charge for each development type, and may depend upon the strategy for growth that is pursued.

Question 5:

Is the information contained in the Infrastructure Delivery Plan October 2018 the most up to date? If not please provide details. Are there any other specific infrastructure issues that the Local Plan should look to address? If no, then what further evidence is required?

Call for Sites

- 3.50 As part of the Strategic Housing and Employment Land Availability Assessment (SHELAA) the Council undertook a Call for Sites exercise in November 2017. This gave any landowner wishing to see their sites considered for development the opportunity to submit them to us for consideration. A large number of sites were submitted and in addition, officers identified a number of other potential development sites in accordance with the requirements of the National Planning Practice Guidance. The methodology for assessing sites in the SHELAA is subject to consideration by an independent panel of development and property market professionals to enable an assessment of a site's suitability for allocation. Any sites considered to be suitable for allocation will be considered as part of the plan preparation process, with site options then subject to further sifting in line with the Council's methodology for site selection (see Chapter 6). A SHELAA report documenting all of the sites assessed and drawing conclusions about each site has been published alongside this consultation document. It is important to remember that the SHELAA report is only a technical evidence document and it does not allocate sites for development.
- 3.51 Whilst the initial call for sites has taken place, we are happy to receive additional sites during the consultation period. If you are aware of any site that may have development potential or you are a landowner, developer or a business and have a site you would like to bring to our attention, please complete a site submission form, available from www.sstaffs.gov.uk/SHELAA and send it to us using the details under the 'How to respond and next steps' heading detailed on page 4.

4. Level of Growth

Housing – level of growth

Housing needs and the Housing Market Area (HMA)

- 4.1 The Council's previous housing target in the current Local Plan was 3,850 dwellings to be provided within South Staffordshire between 2006 and 2028, equating to 175 dwellings each year. This was based on a strategy of rural renaissance for the district, providing only enough housing to meet the needs of the local population in South Staffordshire, whilst seeking to reverse the historic trend of out-migration from adjacent urban areas into the district. The Black Country authorities used a complementary strategy, which planned for higher housing growth in the Black Country to assist the regeneration of their urban area. These housing numbers were set out in a Regional Spatial Strategy for the West Midlands, which apportioned housing targets to different authorities based on a thorough assessment of each local authority's capacity to accommodate housing growth.
- 4.2 Since this time, national policy has changed radically, particularly through the abolition of Regional Spatial Strategies, the introduction of the National Planning Policy Framework (NPPF) in 2012 and subsequent revisions to the NPPF in 2018. There is no longer a regional policy document in the West Midlands which sets out how housing growth should be distributed to meet housing needs. Instead, the starting point for the Council is to meet its own local housing needs, using a set methodology for calculating this provided by the Government. The Council must also take into account any needs which cannot be met by neighbouring authorities, and establish a Statement of Common Ground (SoCG) to distribute unmet housing needs amongst whichever local authorities are considered to be within the most appropriate functional area.

South Staffordshire's local housing need

- 4.3 In order to meet the requirements of the National Planning Policy Framework, the Council needs to re-examine its local housing needs. This will be done using the standard methodology for assessing housing need set out by the Government, which is a transparent three step process as set out below.

Step 1 – Calculate the average household growth over a ten year period

Government guidance indicates that this is done using a continuous 10 year sample period from the current year, using the most recent National Household Projections. These projections indicate that, the number of households in South Staffordshire is expected to increase by **2,190 over a 10 year period of 2018-2028, implying an average yearly household growth of 219 dwellings each year.**

Step 2 – Make an adjustment to take account of market signals/affordability

Government guidance requires us to make an adjustment to the figure given in Step 1, using an adjustment factor which takes account of the ratio of median house prices to median workplace earnings, using the most recently published data provided by the Government. The greater the disparity between house prices and wages in an area, the greater the extent of the uplift.

For South Staffordshire, the local median affordability ratio is 7.72 (i.e. local house prices are nearly 8 times local wages within the district). Using calculations set out in Government guidance, this results in an uplift of 23.55% above the figure given in Step 1, resulting in a **new requirement for 270 dwellings per annum in South Staffordshire.**

Step 3 – If appropriate, cap the extent of the uplift made to the household growth

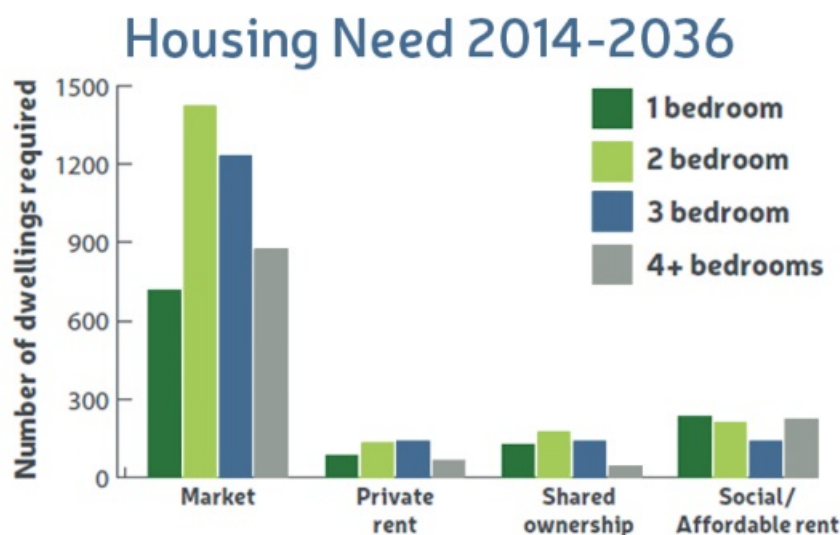
Government guidance indicates that there are two instances in which uplifts to local housing need made under Step 2 can be reduced. These are as follows:

- Where the level of increase implied by Step 2 is 40% above the level of household growth implied by Step 1.
- Where the level of increase implied by Step 2 is 40% above an up-to-date local plan adopted within the last five years.

Neither of these provisions apply in the case of South Staffordshire, and consequently the district needs to plan for an annual rate of **270 dwellings per annum. This is our OAN (Objectively Assessed Need)**

- 4.4 **The national standard method of assessing housing need gives the district an OAN figure of 270 dwellings per annum, which will need to be accommodated across the relevant plan period.** However, it is important to note that current Planning Practice Guidance indicates that this method of calculating housing need may be revised by the Government at the end of 2018 following the publication of the 2016 Household Projections. In such circumstances, the local housing need figure to inform the Local Plan would have to be revised.
- 4.5 National planning policy is clear that strategic policies (such as housing targets) should look ahead over a minimum 15 year period from adoption. Therefore, based on an anticipated adoption date of 2022, the Local Plan review will need to plan up to 2037 to accommodate the required 15 year period. The Council's calculation of local housing need is undertaken from the current year of 2018, in accordance with the Planning Practice Guidance. Therefore, **this would imply a 19 year period of 2018 – 2037 within which housing needs must be met within the district.**
- 4.6 Taking the Council's annual housing need of 270 dwellings per annum and the 19 year period over which we will need to plan, **the Local Plan review will need to plan for a local housing**

need of 5,130 dwellings to accommodate South Staffordshire’s own housing need in the 2018 – 2037 period. This need will be updated throughout the plan’s preparation as and when the Government updates the National Household Projections or local authority median affordability ratios. Equally, this may entail revising the plan period in advance of the Local Plan being finalised.



Source: Strategic Housing Market Assessment Part 2 – June 2017

Wider unmet housing needs

- 4.7 Previously, the Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP) commissioned a study which shows that **South Staffordshire sits in an HMA with thirteen other local authorities, including Birmingham and the Black Country.** This HMA has been confirmed by the Secretary of State through the examination of the 2017 Birmingham Development Plan as an appropriate geography within which to ensure that unmet housing needs are met, due to the level of functional self-containment of migration and commuting patterns within these fourteen local authority areas. Therefore, **the Greater Birmingham HMA is considered as an appropriate geography across which to plan for housing needs.**
- 4.8 Consequently, South Staffordshire needs to have regard to the unmet needs arising from this HMA in setting its housing target in the Local Plan review. In particular, the Birmingham Development Plan confirmed a shortfall of 37,900 dwellings which couldn't be accommodated in Birmingham, meaning that other HMA authorities need to thoroughly examine their ability to meet a share of these needs. It has also become apparent that the urban area of the Black Country may no longer have capacity to meet the Black Country's housing needs, with early consultation stages of the Black Country Core Strategy Review identifying a significant additional housing shortfall of around 22,000 dwellings that can't be accommodated in the urban area.
- 4.9 Most recently, an **HMA Strategic Growth Study** has been prepared by consultants, covering all fourteen local authorities to quantify the housing shortfall across the entire HMA. **This considered all evidence on housing need and supply as of 31st March 2017 and identified a cumulative total shortfall of 60,855 dwellings across the HMA up to 2036.** The study indicated that this shortfall largely arose from Birmingham and the Black Country authorities

and that it couldn't be accommodated on existing sites identified for housing in those authorities.

- 4.10 To identify possible options to meet this significant shortfall, the HMA Strategic Growth Study identified a range of potential development options in the Green Belt across the HMA. These included new settlements, urban extensions and dispersed housing developments which could be tested by each of the fourteen local authorities through reviews of their local plans. However, national planning policy also requires full examination of all other reasonable options for non-Green Belt land before considering the release of Green Belt land. Therefore, the HMA Strategic Growth Study considered options to increase densities and release additional supply/previously developed land in non-Green Belt locations before examining Green Belt options, as well as considering the sustainability implications of strategic growth locations past the Green Belt. Ultimately, it was concluded that even if existing housing supply was increased through a significant uplift in densities across the HMA and additional urban supply was brought forward, as of 2017 there would still be a HMA-wide shortfall of around 48,000 dwellings up to 2036.
- 4.11 Although prepared in advance of recent national policy changes, it is important to note that the HMA Strategic Growth Study considered the implications of the Government's recently adopted method of assessing housing need, and ultimately concluded that using this method of assessing need would still imply a significant shortfall within the HMA up to 2036. However, the HMA Strategic Growth Study's publication has been closely followed by a 2018 West Midlands Housing Deal between the West Midlands Combined Authority and national Government. This agreement confirmed that **there is a commitment from eleven of the fourteen HMA authorities (including Birmingham and the Black Country) to seek to increase the rate of housing delivery in order to ensure their own housing needs are met up to 2031.** Therefore, although there will likely still be a significant housing shortfall in the period following 2031, the West Midlands Combined Authority's Housing Deal may act to further reduce the scale of unmet housing needs within the HMA. This will be important in considering the contribution South Staffordshire can make to the housing market shortfall, particularly given that the district is around 80% Green Belt, which requires exceptional circumstances to justify its release.
- 4.12 Therefore, despite efforts to increase the supply of housing land within Birmingham and the Black Country, **there is still significant pressure for South Staffordshire and other local authorities surrounding the conurbation to release additional housing land to ensure this shortfall is met.**

Strategic recommendations of the HMA Strategic Growth Study

- 4.13 For South Staffordshire, the HMA Strategic Growth Study recommended the areas of search set out below be tested through the Local Plan review, as they could have the potential to significantly assist in meeting unmet housing needs from the wider HMA.

Recommended capacity of South Staffordshire in the HMA Strategic Growth Study:

- 1 urban extension of at least 1,500 dwellings
- 1 urban extension to an existing strategic employment site to accommodate at least 1,500 dwellings
- 2 areas of dispersed housing development capable of accommodating at least 500 dwellings

- 4.14 The recommended strategic locations for South Staffordshire and other HMA authorities are yet to be tested in detail through individual local plans. Therefore, further work will be needed and evidence such as local assessments of infrastructure capacity, Green Belt Reviews and the degree to which land is available to meet these recommendations will ultimately influence to what degree the recommendations of the study can be implemented. In addition, detailed local assessments may raise more sustainable options within the district to assist in meeting any shortfall. It is also important to note that **monitoring information from the last 22 years (covering the last two Local Plan periods) indicates that the maximum number of new housing completions achieved in any one year in South Staffordshire was 366 dwellings¹**. There is therefore a risk that an annual housing target which drastically exceeds this figure may not be a realistic indication of what can be built out within the local housing market.
- 4.15 **South Staffordshire also borders a number of authorities outside the HMA, such as Shropshire, Telford and Stafford.** National Green Belt policy makes clear that before we release Green Belt land, we must discuss with neighbouring authorities as to whether they could assist in accommodating identified development needs. Therefore, **there will be a need for South Staffordshire to discuss the potential for neighbouring authorities to take unmet needs arising from the HMA or South Staffordshire before Green Belt is released to meet these needs.** As most additional housing supply within South Staffordshire will be likely to come from Green Belt release and will need exceptional circumstances to justify its release, **any housing target set through the Local Plan will require thorough consideration of non-Green Belt options both within and outside South Staffordshire before being finalised.**

Policy Options

Table 4: Housing level of growth policy options

Option	Requirement 2018 - 2037	Average annual requirement
Option A: Provide enough housing to meet South Staffordshire’s objectively assessed housing need.	5,130	270
South Staffordshire would provide enough housing to meet its own local housing needs, but would not contribute towards the unmet needs of neighbouring authorities/regional housing shortfalls, such as the shortfall arising from the Greater Birmingham Housing Market Area.		
Option B: Provide enough housing to meet South Staffordshire’s objectively assessed housing needs, and a modest contribution to the HMA’s unmet housing needs. This additional contribution could reflect the maximum yearly completions historically achieved within the district amounting to 1520 dwellings.	7,030	370
This would provide a moderate uplift in housing provision within the district to contribute towards the housing shortfall arising from the Greater Birmingham Housing Market Area, based upon the maximum levels of growth which have proved realistic and deliverable in the last 22 years. It		

¹ This is based on historic monitoring information from the last two plan periods to the present (i.e. 1996 – 2018). The greatest level of housing completions achieved in any single year during this period was 366 dwellings in the 2007/08 monitoring year.

Option	Requirement 2018 - 2037	Average annual requirement
<p>would ensure a greater degree of certainty that the level of additional housing could be achieved. However, this approach would not be sufficient to deliver the levels of growth implied by the recommended strategic Green Belt and Open Countryside areas of search for South Staffordshire set out in the HMA Strategic Growth Study.</p>		
<p>Option C: Provide enough housing to meet South Staffordshire’s objectively assessed housing needs, and provide enough land to accommodate a minimum of an additional 4,000 dwellings towards wider housing shortfalls from the HMA (having regard to the minimum capacity implied by the Green Belt and Open Countryside strategic areas of search set out in the HMA Strategic Growth Study).</p>	<p>9,130</p>	<p>481</p>
<p>This would ensure South Staffordshire provided a significant contribution towards unmet needs of the HMA, based upon the levels of growth implied by the strategic areas of search for South Staffordshire within the HMA Strategic Growth Study. It would provide certainty to other HMA authorities that the Council was testing its recommended capacity to accommodate additional growth based upon a consistent HMA-wide evidence base. This quantum of dwellings represents a significant (30%) annual increase above the single highest yearly level of housing completions achieved in the district in the last 22 years.</p>		
<p>Option D: Provide enough housing to meet South Staffordshire’s objectively assessed housing needs, and provide enough land to accommodate an additional 12,000 dwellings towards wider housing shortfalls from the HMA (having regard to the mid-point capacity implied by the Green Belt and Open Countryside strategic areas of search set out in the HMA Strategic Growth Study).</p>	<p>17,130</p>	<p>902</p>
<p>This would ensure South Staffordshire provided a greater contribution towards unmet needs of the HMA, based upon the levels of growth implied by the strategic areas of search for South Staffordshire within the HMA Strategic Growth Study. This quantum of dwellings represents a very significant (144%) annual increase above the single highest yearly level of housing completions achieved in the district in the last 22 years.</p>		
<p>Option E: Provide enough housing to meet South Staffordshire’s objectively assessed housing needs, and enough land to accommodate an additional 20,000 dwellings towards wider housing shortfalls from the HMA (having regard to the upper capacity implied by the Green Belt and Open Countryside strategic areas of search set out in the HMA Strategic Growth Study).</p>	<p>25,130</p>	<p>1,323</p>
<p>Under this option South Staffordshire would provide around a third of the current HMA-wide housing shortfall set out in the HMA Strategic Growth Study, before any recommendations to increase supply and densities within the existing urban areas have been fully examined by other HMA authorities. This quantum of dwellings represents a very significant (257%) annual increase above the single highest yearly level of housing completions achieved in the district in the last 22 years.</p>		

- 4.16 Despite the further testing required on its recommendations, the HMA Strategic Growth Study is still important as it offers a consistent independent assessment of the potential capacity of all fourteen authorities to accommodate the housing needs of the HMA. If South Staffordshire tested **accommodating additional housing growth equivalent to the minimum capacity of all the recommended areas of search in South Staffordshire, as set out in the HMA Strategic Growth Study, it would total a minimum of 4,000 additional dwellings.** If other authorities in the HMA were to take this approach of seeking to accommodate the minimum capacity implied by all the HMA areas of search, then the housing shortfall identified in the HMA Strategic Growth Study up to 2036 would be met. Existing information from the Birmingham Development Plan and the Black Country Core Strategy Review Issues and Options consultation indicates that the majority of this unmet need comes from Birmingham and the Black Country. Therefore, **this contribution to unmet HMA needs would be in addition to South Staffordshire’s own local housing need of 270 dwellings per annum.**
- 4.17 Committing to test a minimum of 4,000 dwellings towards wider housing shortfalls offers an assurance to other authorities within the HMA that the district will ensure that the recommendations of the HMA Strategic Growth Study are incorporated into any Local Plan review. Other authorities in the HMA are yet to test the strategic areas of search recommended to them by the HMA Strategic Growth Study, which include recommended areas of search outside of the Green Belt and proposals to minimise Green Belt release through increased density policies within urban areas. It is also important to note that the HMA Strategic Growth Study identifies areas of search within South Staffordshire as being within a relatively weak housing market compared to other rural areas surrounding the conurbation, meaning that there may be less capacity to accommodate additional uplifts in housing supply within South Staffordshire compared to other areas with stronger housing markets. Furthermore, initiatives such as the West Midlands Housing Deal may act to reduce the extent of the shortfall by bringing forward the delivery of sites in other HMA authorities, through increasing the rate of delivery of brownfield and underutilised land.

Council’s preferred level of future growth

- 4.18 **It is the Council’s view that at this time Option C represents a proportionate contribution towards both its own housing needs and the needs of the wider HMA.** This would imply that the Local Plan review should plan for a minimum requirement of 9,130 dwellings over the 2018-2037 period. However, should the housing shortfall be reduced, then the contribution to wider unmet housing needs from South Staffordshire would also be reduced proportionately.

Question 6:

Do you agree that Option C represents an appropriate and proportionate housing target for the Local Plan review, having regard to the Council’s own needs and the needs of the wider Greater Birmingham Housing Market Area?

Question 7:

Are there any other options to consider, including a different housing requirement not included in the range of options above? If so, what evidence is there to support your option?

Question 8:

Is the plan period of 2018 – 2037 an appropriate response to the Government’s guidance on meeting housing needs? Should we consider an alternative plan period?

Question 9:

The NPPF requires us to approach all neighbouring authorities before releasing Green Belt for unmet housing needs and to plan for cross-boundary needs over the most appropriate functional geography. In light of this, is the Greater Birmingham Housing Market Area the most appropriate geography over which to address unmet housing needs?

Safeguarded land/reserve housing sites

- 4.19 The National Planning Policy Framework (NPPF) requires councils to identify areas of safeguarded land between an urban area and the surrounding Green Belt, where this is necessary to meet longer-term development needs stretching well beyond the plan period. Previously, the Council was required by the adopted Core Strategy to find land sufficient to deliver 1,750 dwellings beyond the Core Strategy’s plan period (i.e. from 2028 – 2038). However, the changing nature of unmet needs from other local authorities and subsequent changes to the district’s own housing needs mean that this approach may have been a significant underestimation of the potential amount of land required to meet longer term development needs beyond the plan period. South Staffordshire sits within a HMA of significant unmet housing needs and is required by Government guidance to review its housing needs every five years. Therefore, the approach of identifying safeguarded land to ensure development boundaries are maintained “well beyond the plan period” may not be an appropriate response to the region’s housing needs.

Question 10:

Should the Council identify additional safeguarded land through the new Local Plan? If so, how much should be identified? Is there an alternative approach that the Council could take?

Gypsies, Travellers and Travelling Showpeople – level of growth

- 4.20 Previous planning policies prepared by the Council have sought to allocate new pitches to meet needs set out in a 2008 Gypsy and Traveller Accommodation Assessment. From 2006-2028, this assessment identified a need within the district for 85 residential pitches, 5 transit pitches and 19 Travelling Showpeople plots. Since this 2008 evidence was prepared, changes to national planning policy and more up-to-date evidence have come to light. We therefore need to reconsider whether more pitches are required.
- 4.21 A new Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTTSAA) 2017 has been prepared for South Staffordshire and the Black Country. This indicates that **South Staffordshire has a need for 87 residential pitches and 3 Travelling Showpeople plots over the 2016-2036 period**, taking account of pitches which have already been given planning permission as of 2016. **The Council’s current Site Allocations Document (SAD) allocates enough land to deliver 20 additional residential pitches within the district.** Given the constrained nature of the district and the lack of any large sites within an existing development boundary, all of the additional land to deliver these pitches had to come forward on existing sites within the Green Belt. The allocated pitches in the SAD reduces the total need of 87 residential pitches up to 2036, as will any additional permanent pitches and plots which are granted planning permission before the Local Plan review is finalised. To date, the Council has only received new site suggestions for pitches that are in the Green Belt.
- 4.22 Despite the additional residential pitch allocations made in the SAD, **there is still a substantial residual shortfall of 67 residential pitches and 3 Travelling Showpeople plots in South Staffordshire.** The Local Plan review will need to consider whether or not these needs can be met in full within the district given the currently availability of land for this need, and whether some of these unmet needs could be better accommodated on non-Green Belt sites, or on land in neighbouring local authorities.

Policy Options

Table 5: Gypsy, Traveller and Travelling Showpeople policy options

<p>Option A: Provide enough Gypsy and Traveller pitches and Travelling Showpeople plots to meet identified needs up to 2037 within the district.</p>
<p>This would mean South Staffordshire would allocate additional land sufficient to deliver 67 residential pitches and 3 Travelling Showpeople plots. Given the scale of these needs, this would likely require additional land to be released in Green Belt locations as only Green Belt sites have been suggested to date.</p>
<p>Option B: Export any unmet needs for Gypsy and Traveller pitches and Travelling Showpeople plots to neighbouring local authorities.</p>
<p>The Council could pursue this option if, having examined its own ability to meet its own needs, there were more sustainable sites available to meet additional pitch requirements in neighbouring local authorities (for example, where non-Green Belt options are available). Any redistribution of the district’s needs would have to be agreed with other neighbouring authorities through the Duty to Cooperate.</p>

Question 11:

Which of the above option(s) do you think should be pursued? Are there any other options to consider?

Question 12:

Do you agree that the need identified in the Gypsy, Traveller and Travelling Showpeople Accommodation Assessment 2017 is appropriate and in line with national guidance?

Employment – level of growth

Economic Development Needs Assessment (EDNA)

- 4.23 The Council's adopted Core Strategy did not set a specific target for additional employment land, however it did commit the Council to refreshing its employment land evidence base and to allocate additional employment land through the Site Allocations Document (SAD) where justified. The evidence base to support the SAD identified that South Staffordshire could have a role in meeting unmet employment needs from the Black Country and led to the Council allocating an additional 62ha of employment land (at i54 western extension and ROF Featherstone) through the SAD to reflect this. This supports a key partnership between South Staffordshire Council, Staffordshire County Council and City of Wolverhampton Council that has seen the development of the i54 South Staffordshire business park. This has seen the area around the M54 corridor at Junction 2 prosper into a nationally significant focus for advanced manufacturing, attracting such companies as JLR, MOOG and Eurofins. This reflects the Stoke-on-Trent and Staffordshire Enterprise Partnership Strategic Economic Plan (SEP) 2014 which identifies a number of priority sectors, including the development of advanced manufacturing industries in the aerospace and automobile sectors.
- 4.24 The new Local Plan will need to reconsider our own employment land requirements up to 2037, and through a Statement of Common Ground ensure that the needs of the wider Functional Economic Market Area (FEMA) are agreed with neighbouring authorities and planned for. To inform this, a new EDNA has been prepared that has identified South Staffordshire as being in a FEMA with Cannock Chase district, Dudley, Walsall and Wolverhampton. The EDNA identified that South Staffordshire has sufficient supply of available employment land to meet its own employment requirements over the plan period (to 2037), with around a 20ha oversupply. However, national guidance requires that employment land requirements are considered over the wider FEMA, and therefore South Staffordshire is still likely to have a role in meeting wider employment land needs arising from within the FEMA. The greatest need is likely to come from the Black Country, who have identified through their own EDNA a need to plan for 800ha of employment land to realise their Strategic Economic Plan (SEP) ambitions; however when considering existing supply, this need would reduce to around a 530ha 'gap' in supply over their plan period. They are currently undertaking further evidence gathering to see if they can reduce this gap further including additional assessment of their urban capacity and a Green belt review.
- 4.25 Discussions on the employment shortfall in the FEMA will be ongoing, and South Staffordshire's potential role in meeting some of the shortfall will become clearer once new site options in the Black Country have been considered through the preparation of their Local

Plan, and new site options in South Staffordshire have been assessed through an EDNA part 2. Nevertheless, some of the options on the level and location of employment growth contained in this document reflect South Staffordshire’s potential role in allocating additional employment land to meet cross boundary employment needs.

Policy Options

Table 6: Employment level of growth policy options

<p>Option A: To reflect the oversupply of employment land in the District, deallocate the poorest quality employment land as identified by the EDNA and reallocate poorer quality sites that would be suitable for alternative uses.</p>
<p>This could involve a targeted approach of deallocating employment sites that are of poorer quality, and could focus on those that include vacant units/land, where these would represent a sustainable location for an alternative use such as housing. However, there is a risk that this approach would reduce flexibility in the employment land supply, and could result in an under provision if employment sites were lost unexpectedly.</p>
<p>Option B: Maintain current protection for the existing employment land stock.</p>
<p>This reflects the oversupply of employment land in the District but would not deallocate sites in order to provide a degree of flexibility in provision.</p>
<p>Option C: Allocate additional employment land to meet cross boundary employment needs, where an undersupply in other areas of the Functional Economic Market Area (FEMA) is robustly demonstrated.</p>
<p>This approach would seek to meet evidenced unmet needs for employment land originating from other areas of the FEMA. A surplus of employment land identified through the EDNA Stage 1 could form (in full or in part) to our contribution to these wider employment needs.</p>

Question 13:

Which of the above option(s) do you think should be pursued? Are there any other options to consider?

Question 14:

Do you agree that the EDNA (stage 1) has been undertaken in line with national guidance and is a robust starting point for planning for future employment needs?

Strategic Rail Freight Interchange (SRFI)

- 4.26 Historically, South Staffordshire has come under pressure to consider whether or not a single large scale logistics site could be accommodated in the district to serve the rail freight distribution needs of the wider region. Such sites are known as Strategic Rail Freight Interchanges (SRFI). Following recommendations made in regional policy, the adopted Core Strategy committed South Staffordshire to preparing a comprehensive study to examine the potential for an SRFI within the district, including consideration of land at Four Ashes industrial estate and ROF Featherstone. A 2013 study² was prepared by South Staffordshire and the

² [Black Country and southern Staffordshire Regional Logistics Site Study 2013](#)

Black Country authorities which ultimately concluded that there was still a need for a SRFI within the West Midlands, but that another study should be commissioned that examined the rest of the West Midlands, as an SRFI may be better located to meet these needs outside of South Staffordshire. This matter was subsequently re-examined in a 2015 study³ prepared by all West Midlands local authorities, which recognised that there may be more appropriate locations for such large sites on the eastern side of the West Midlands region. Therefore, evidence prepared to date is still inconclusive as to whether or not an SRFI should be located within the district.

- 4.27 Since the 2013 and 2015 studies were finished, a planning application has been prepared for an SRFI to the north of Four Ashes industrial estate, which was submitted directly to the Secretary of State (PINS) on 3 August 2018. This proposal encompasses approximately 300ha of land and is known as West Midlands Interchange. The planning application is expected to be determined by the Secretary of State in 2020, meaning the implications of West Midlands Interchange will not be clear until late in the plan-making process.

Question 15:

If granted approval, what implications will the SRFI proposal at Four Ashes have for the Local Plan review?

Retail – level of growth

- 4.28 South Staffordshire's retail and village/town centre needs have historically been met by the existing higher order centres in the surrounding urban areas, with many residents travelling into the Black Country/Stafford/Cannock/Telford to meet their shopping needs. In addition to the urban area's retail and services offer, the rest of residents' needs have been met by smaller shops and services in the district's larger village centres. Key examples are set out in Core Policy 8 of the Core Strategy, which identifies the larger village centres as Bilbrook, Brewood, Codsall, Coven, Cheslyn Hay, Great Wyrley, Kinver, Pattingham, Penkridge, Perton, Swindon, Wheaton Aston and Wombourne. This policy also identifies multiple smaller neighbourhood centres that support the day to day needs of residents in their immediate vicinity. The Council's previous policy has been to preserve the role of these existing centres, whilst allowing the Black Country authorities to plan for higher order retail and town centre needs in the larger urban centres. However, this approach was based upon the existing Core Strategy, which only planned for a limited level of housing growth within the district. As set out in previous sections, the district is likely to have to plan for higher housing needs, meaning that we may need to reconsider whether or not this existing approach to retail and town centre needs is appropriate.

Question 16:

Can the Council continue to rely on its existing approach to meeting the retail needs of the district in the existing village centres and the facilities in the adjacent urban area? Is any other evidence required to support the retail needs of future development areas in the district?

³ [West Midlands Strategic Employment Sites Study 2015](#)

5. Locations for Growth

Housing – locations for growth

What does the evidence say?

- 5.1 The Housing Market Area (HMA) Strategic Growth Study sets out a number of strategic development locations across the fourteen HMA authorities, which need to be tested through the plan-making process. For South Staffordshire, it specifically sets out areas of search to be tested through the Local Plan review.

A) Recommended South Staffordshire Areas of Search in the HMA Strategic Growth Study

- 1 urban extension of between 1,500 – 7,500 dwellings to the north of Penkridge.
- 1 employment-led urban extension of 1,500 – 7,500 dwellings to the north of Wolverhampton, in the area surrounding the i54 employment site.
- An area of dispersed housing development of between 500 – 2,500 dwellings to the north of Codsall and Bilbrook. This could be made up of multiple smaller sites.
- An area of dispersed housing development of between 500 – 2,500 dwellings on the western edge of the Black Country conurbation between Wolverhampton and Stourbridge. This could be made up of multiple smaller sites.

B) Densities

- 5.2 In addition to these strategic locations, the HMA Strategic Growth Study examines the contribution to housing needs that could be made by additional urban land supply (i.e. sites within existing development boundaries) and **increased densities on housing sites**. Having taken account of all known additional urban supply in South Staffordshire, the study concludes that a 60,855 dwelling shortfall still exists once these sources of supply are accounted for. However, it does recognise that introducing minimum density thresholds across all HMA local authorities may increase delivery by approximately 13,000 dwellings across all local authorities. For South Staffordshire, the study concludes that achieving an average density of 35 dwellings per hectare on the district's Site Allocation Document (SAD) housing sites could deliver another 121 dwellings within the district. Therefore, there currently appears to be limited capacity to realise additional housing within South Staffordshire on existing housing sites. However, it may help to minimise the extent of new land required by adopting a 35 dwellings per hectare minimum density standard for new housing sites identified through the Local Plan review. As referenced in the Housing Topic Paper addendum (September 2017) produced to support the SAD, greenfield market housing sites between 2007 and 2017 indicates an average density of around 32 dwellings per hectare in the district.

Question 17:

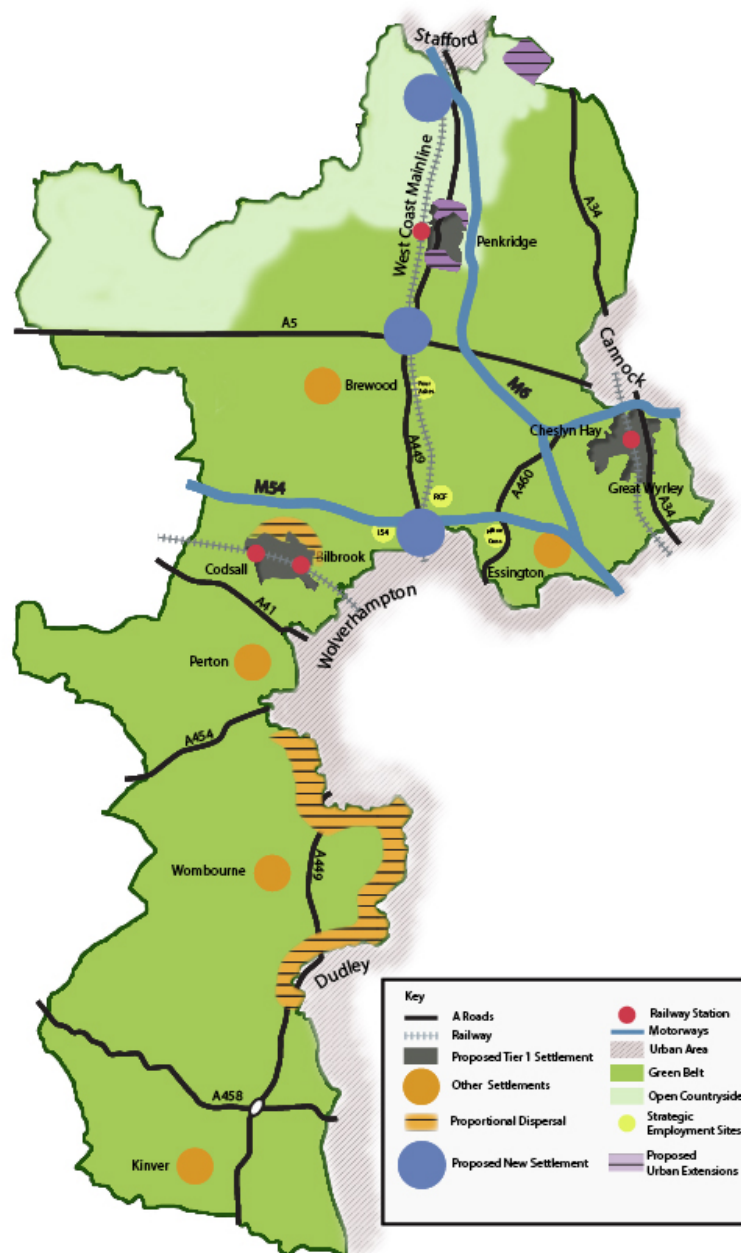
Should the Council introduce a minimum density standard of 35 dwellings per hectare on all housing sites? If not, what factors should the Council consider when considering setting minimum density standards?

C) Alternative areas of search and other strategic site options suggested to the Council

5.3 The site options set out in the HMA Strategic Growth Study are only initial recommendations for testing, based on high level evidence. There are also other options which will need to be tested through the Local Plan review including:

- Alternative areas of search considered in the HMA Strategic Growth Study that were ultimately not recommended for further testing
- Alternative sites identified through the Council’s Call for Sites process

5.4 These options could represent more sustainable choices for development than those recommended by the HMA Strategic Growth Study, once a more thorough and detailed assessment of local evidence is completed e.g. Green Belt Reviews, transport assessments etc. All areas of search considered by the HMA Strategic Growth Study are set out below:



The district’s rural settlement hierarchy

- 5.5 Aside from any strategic large scale site options, it is also important to consider the relative ability of individual settlements in the district to accommodate future growth. Historically, new housing development has been allocated to the larger existing villages in the district, which were previously known as our Main Service Villages. The 2012 Core Strategy directed 90% of new housing growth to Main Service Villages and 10% to smaller Local Service Villages, recognising the level of essential community facilities and services present in these villages and their access to public transport infrastructure. This aimed to ensure housing growth was located where it would help to meet local housing needs in the most sustainable locations, where the need for new residents to travel to meet their day-to-day needs would be reduced.
- 5.6 Since the district’s existing settlement hierarchy was prepared there have been a number of national policy changes and an ever-increasing need to consider unmet housing needs from neighbouring authorities. This means that we need to re-evaluate the role and relative sustainability of individual villages within the district, to ensure that this evidence is still robust. We also need to consider options outside of the existing villages that might offer sustainable options to accommodate growth, such as freestanding new settlements or development on the edge of towns and cities that are bordered by South Staffordshire.
- 5.7 So that any future growth is located in the most sustainable locations available, a new Rural Services and Facilities Audit (2018) has been prepared to assess the sustainability of each of the district’s settlements relative to each other. This separates the district’s settlements into five tiers, with Tier 1 villages having the greatest access to services and facilities and Tier 5 settlements having the least access to services and facilities. This has involved a high level assessment of the services and facilities in each rural settlement within the district, as well as sustainable transport links each settlement has to higher order services, such as employment, retail centres and hospitals. This approach recognises the fact that many of our residents depend on the facilities and services in the urban areas which South Staffordshire adjoins, such as the employment centres in and adjacent to the Black Country. It also recognises the need to locate growth where it will support existing services and enhance or maintain the vitality of rural communities.
- 5.8 The revised settlement hierarchy proposed by the Rural Services and Facilities Audit (2018) is set out below, alongside the key factors that define villages in Tiers 1-5 of the settlement hierarchy.

	Settlement	Common themes
Tier 1 - greatest access to services and facilities	<ul style="list-style-type: none"> • Bilbrook • Cheslyn Hay • Codsall • Great Wyrley • Penkridge 	These settlements typically have food stores, a wider range of services and facilities than other villages, a range of education establishments, access to a train station and good access to employment and wider facilities outside the village via public transport.
Tier 2	<ul style="list-style-type: none"> • Brewood • Essington • Huntington • Kinver • Perton • Wombourne 	Settlements within this tier typically have a food store and a range of services and facilities and education establishments, but the level of provision will typically be less than Tier 1 villages. These villages do not have access to rail stations, but still have a degree of access to services outside the village via public transport.

Tier 3	<ul style="list-style-type: none"> • Coven • Featherstone • Pattingham • Shareshill • Swindon • Wheaton Aston 	Settlements within this tier typically have a small food store but generally have far fewer educational facilities in comparison to Tier 1 and 2 villages and generally have less of a range of services and facilities within the village compared to Tier 1 and 2 villages. These villages still have a degree of access to services and facilities outside the village via public transport.
Tier 4	<ul style="list-style-type: none"> • Bednall • Bishops Wood • Bobbington • Dunston • Himley • Seisdon • Trysull 	Settlements in this tier have either no or very few facilities. Typically, these settlements will have either a small food store or a limited degree of educational facilities (e.g. a primary school). Access to employment via public transport is much poorer than in the higher tiers and there is also much poorer access to other facilities by public transport, with some villages having no public transport provision.
Tier 5 – poorest access to services and facilities	Acton Trussell, Blymhill, Brineton, Burnhill Green, Calf Heath, Codsall Wood, Coppenhall, Enville, Gospel End, Great Chatwell, Halfpenny Green, Hatherton, Kingswood, Lapley, Lawnswood, Newtown, Oaken, Saredon, Springhill, Stourton, Stretton, Wedges Mills, Weston-under-Lizard	Settlements in this tier typically have no facilities and services within the settlement.

Table 7: Revised Settlement Hierarchy

Question 18:

Are the Council’s revised Rural Settlement Hierarchy and the Rural Settlement Hierarchy Study (2018) robust and consistent with national policy?

The need to consider small sites

5.9 National policy requires the Council to identify land to accommodate at least 10% of our housing on small sites of 1ha or less, unless through the preparation of plan policies it can be shown that there are strong reasons why the 10% target cannot be achieved. The availability of these small sites and their relative sustainability will be key to determining how the 10% requirement is met through the new Local Plan.

Potential locations for urban extensions on the fringes of neighbouring urban areas

- 5.10 In addition to any growth options in the rural villages within South Staffordshire, there are a number of options to locate growth on the edge of adjacent urban areas. South Staffordshire's boundary sits directly adjacent to the urban areas of Wolverhampton, Walsall, Dudley, Stafford and Cannock, as seen in the diagrams in paragraph 5.13.
- 5.11 In light of this, there are a number of potential areas of search for both small and large scale urban extensions to neighbouring towns and cities that could be accommodated on site options within South Staffordshire, offering another potential source of future housing supply. These locations can be considered as potential additional or alternative options to accommodate growth within the numerous rural settlements within the district.

Determining a new spatial distribution for housing in South Staffordshire

- 5.12 Existing evidence to date set out in the previous sections offers a wide range of factors to consider in setting how any housing target will be distributed across South Staffordshire. These have been summarised into a number of policy options that could be used to distribute housing across South Staffordshire, which are set out below. It is important to note that **Options A-F below are not necessarily mutually exclusive, and a combination of options** could offer a robust and sustainable strategy for growth going forward.

Spatial Distribution Policy Options

- 5.13 The following 6 spatial options (A-F) show how growth might be focussed across the district in each of the scenarios. Following the Issues and Options it is our intention to consider the options further and assess these against a number of factors as outlined in Chapter 6. This may show that the most sustainable spatial strategy is a combination of the options, although a number of different apportionment options will be tested (and be subject to Sustainability Appraisal) before a preferred spatial strategy is identified.

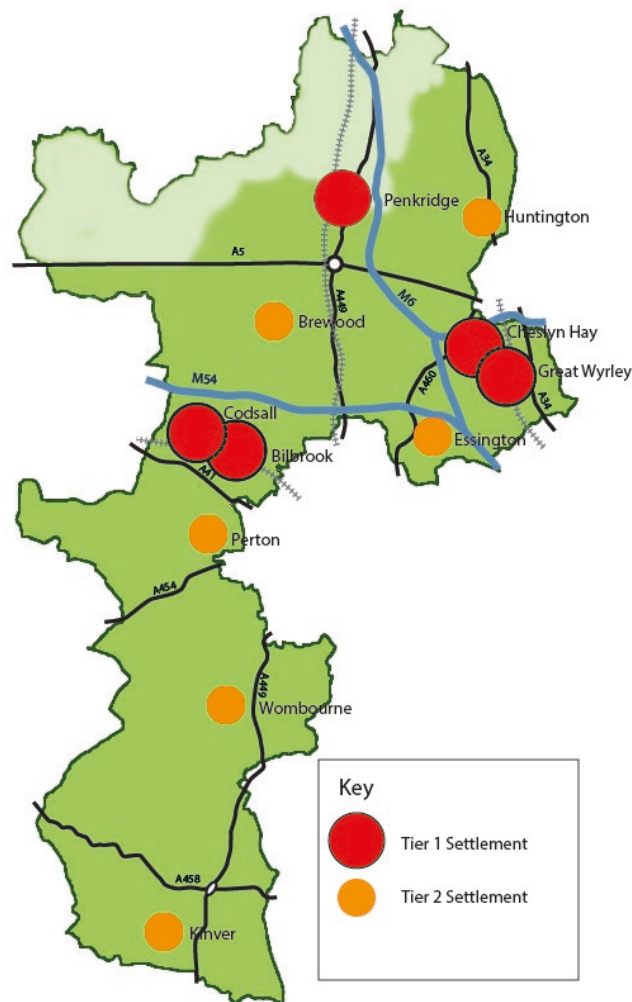
Question 19:

Which of the following Spatial Distribution Policy Options do you think should be pursued? Are there any other options to consider, including any strategy which aims to provide a mixture of the policy options set out above?

Option A: Rural housing growth focused on the district's larger and better connected villages

This option would focus housing growth in and around the villages within the district with the greatest level of services and facilities and public transport access to wider services, such as employment centres i.e. Tier 1 and Tier 2 villages set out in the revised settlement hierarchy. New housing would primarily be focused on Tier 1 villages, reflecting the high level of public transport access and greater variety of services and facilities within these locations, whilst also focusing a moderate amount of new housing allocations in Tier 2 villages, reflecting the relative level of public transport access and significant variety of services and facilities in these locations. Housing supply in Tier 3 and 4 villages would be reliant on windfall supply and exception sites.

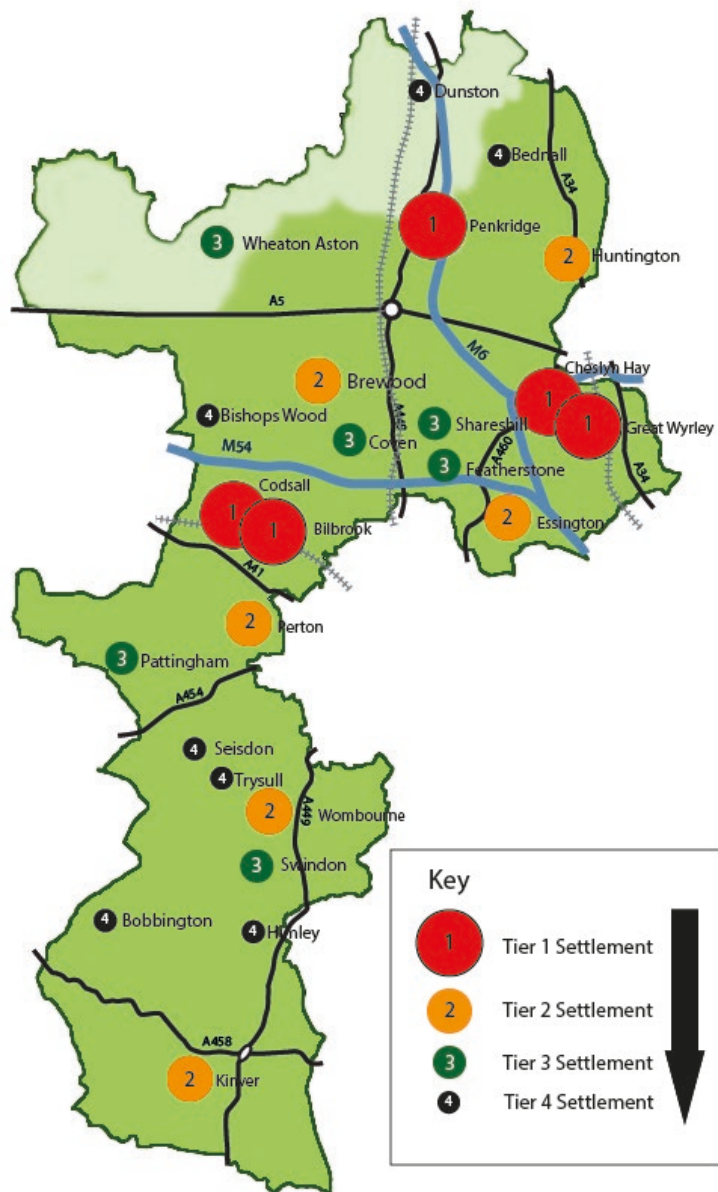
This option may offer an opportunity to test the HMA Strategic Growth Study's recommendations for an urban extension to the north of Penkridge (1,500 – 7,500 dwellings) and dispersed housing development at Codsall/Bilbrook (500 – 2,500 dwellings). It would also offer an opportunity to test the alternative areas of search recommended by the HMA Strategic Growth Study, including an alternative proposed urban extension to the south of Penkridge (1,500 – 7,500 dwellings).



Focusing development into a smaller number of larger villages would offer greater opportunities for these villages to accommodate larger sites capable of delivering new infrastructure/services, such as primary schools and local shopping centres. However, this option may also offer opportunities to allocate small sites in sustainable locations that could make a significant contribution to the national requirement for 10% of housing sites to be on sites of 1ha or less. There is already a supply of safeguarded land in these villages that could contribute towards meeting their housing requirement.

Option B: Rural housing growth dispersed across all settlements with a basic level of service provision within the district

This option would spread housing growth across all villages within the district with a basic level of services and facilities i.e. Tier 1-4 villages set out in the revised settlement hierarchy.

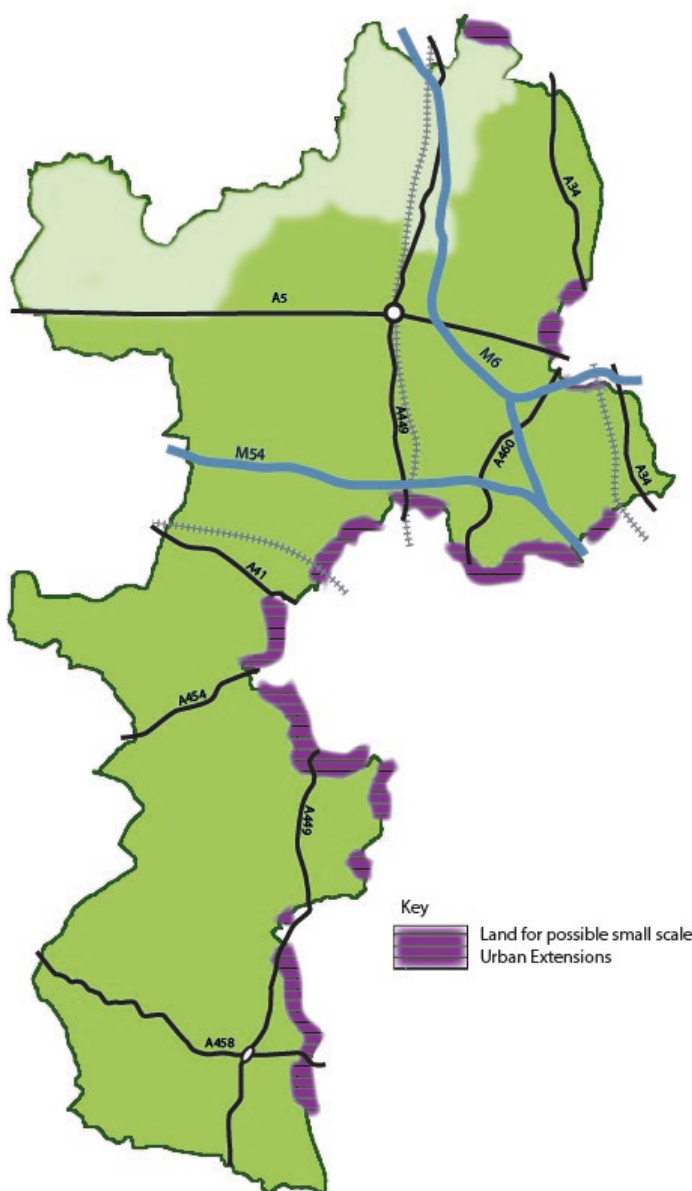


Whilst development would not be sited solely in villages with the greatest existing levels of services and infrastructure, it would offer an opportunity for new development to enhance and maintain services in the district’s smaller villages, helping to maintain the vitality of these settlements. Spreading housing sites across multiple villages would likely mean more supply through small/medium sites. An increased supply of housing could therefore be more easily achieved in the early years of the plan and there would be greater opportunities to diversify the local housing market with small sites.

This option therefore presents an opportunity to make a significant contribution to the national requirement for 10% of housing sites to be on sites of 1ha or less. There is already a supply of safeguarded land in some of these villages that could contribute towards meeting their housing requirement.

Option C: Small-scale urban extensions on the fringe of neighbouring urban areas

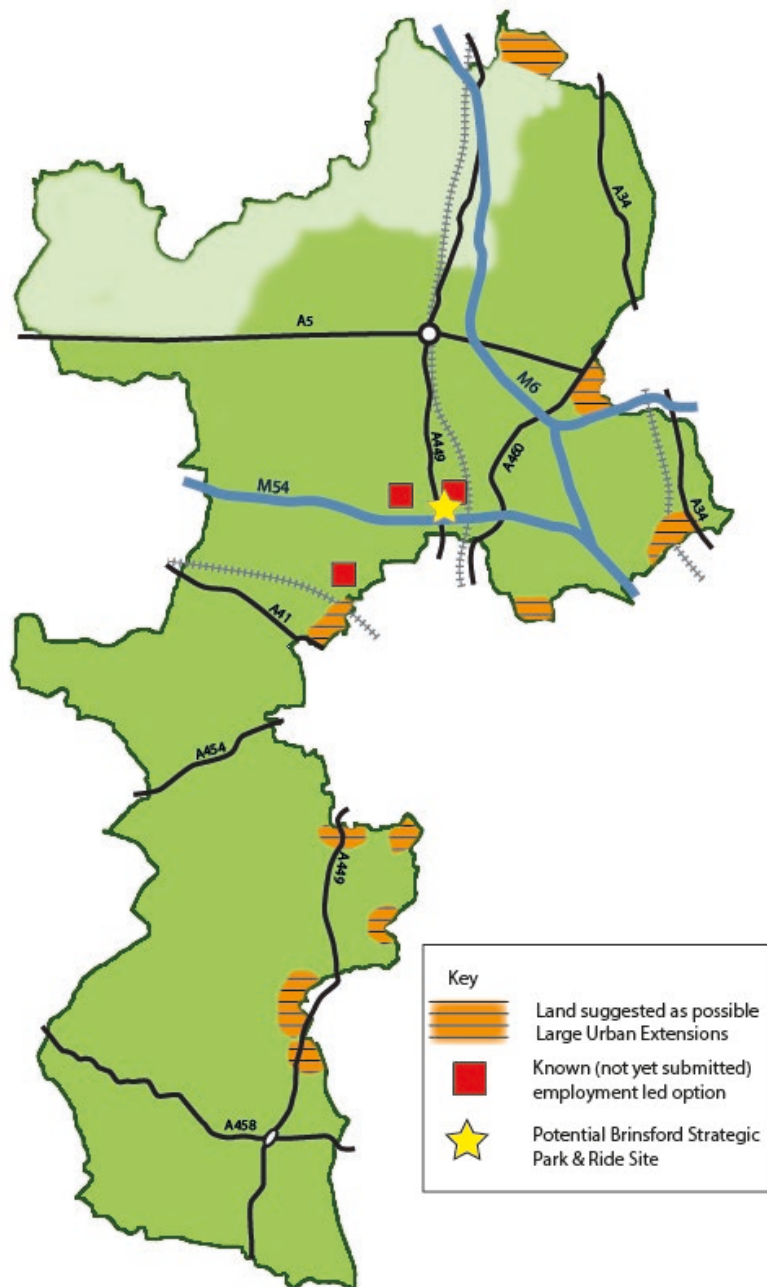
This option would allow for the release of small/medium housing sites adjacent to the neighbouring towns and cities which South Staffordshire borders. Much of the unmet needs in the HMA which South Staffordshire sits within come from the urban areas of Birmingham and the Black Country. There are also numerous sites suggested adjacent to the Black Country urban area through the Council's Call for Sites exercise, as well as other small/medium site options adjacent to the towns of Cannock and Stafford. Therefore, releasing numerous smaller sites with shorter lead-in times adjacent to the urban areas which neighbour the district may offer a sustainable option to deliver housing supply quickly to meet unmet housing needs from the wider HMA. It may also offer an opportunity to create housing sites in locations which 'round off' an existing urban edge, minimising encroachment of the urban area into the Green Belt.



Through examining potential sites to deliver this option, the Council could test the recommended area for dispersed housing development set out in the HMA Strategic Growth Study on the western edge of the Black Country, between Wolverhampton and Stourbridge (500 – 2,500 dwellings).

Option D: Larger urban extensions on the fringe of neighbouring urban areas

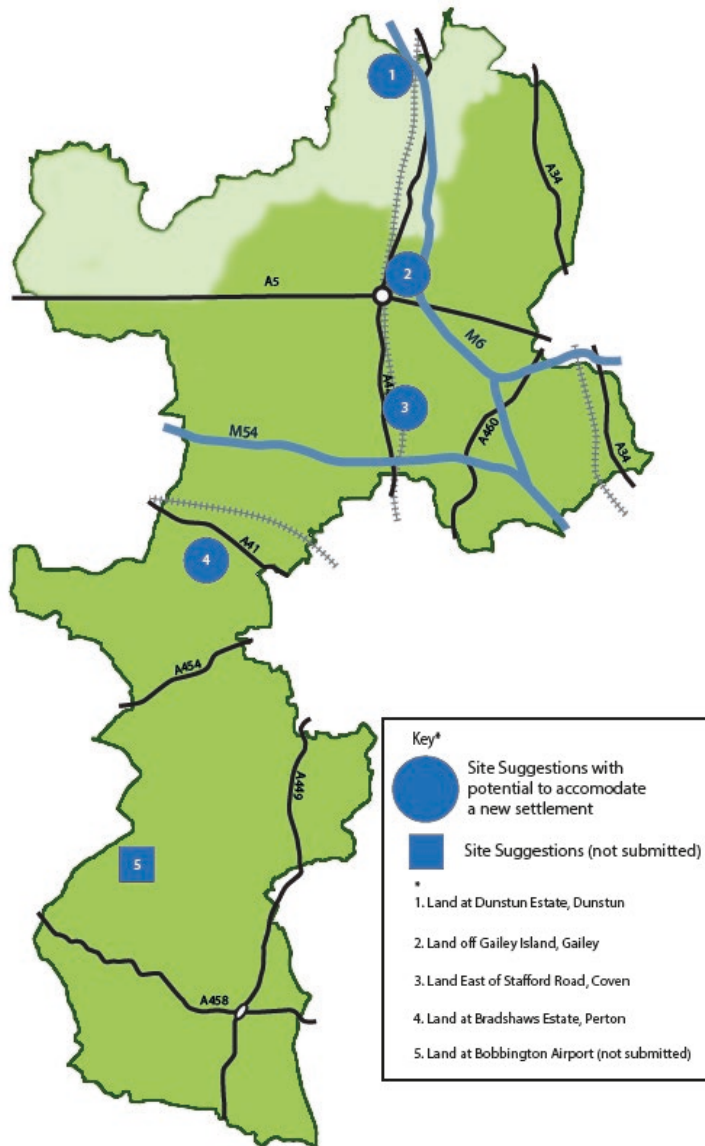
The Council has received numerous site suggestions through the Call for Sites for strategic urban extensions to the Black Country urban area, many of which are significant in scale (e.g. over 500 dwellings). Urban extensions of this scale would be less likely to contribute significantly to housing supply early in the plan period, due to the longer lead-in times typically associated with larger housing sites. However, once underway, larger strategic sites such as these would be more likely to deliver key services such as primary schools and local shopping centres and would be located in close proximity to the areas from which much of the wider unmet housing need originates.



This option would also allow the Council to consider the HMA Strategic Growth Study recommendation for an urban extension of 1,500 – 7,500 dwellings to the north of Wolverhampton around the i54 employment site. Delivery of this HMA recommendation may also help to deliver the existing proposal for a Brinsford Strategic Park and Ride Site in the same area.

Option E: New freestanding settlements away from the existing villages/urban areas

These options are unlikely to realise any supply in the first five years of the plan period and the Council may have to look to deliver additional smaller site options alongside any settlements to maintain a five year supply during the early stages of the plan period. Whilst the final recommended areas of search within the HMA Strategic Growth Study do not include any new settlements within South Staffordshire, there are nonetheless several options for large freestanding locations which have been promoted through the Call for Sites and the HMA Strategic Growth Study. Specifically the HMA Strategic Growth Study considered the potential for new settlements of 10,000 – 15,000 dwellings around Dunston and between Wolverhampton and Penkridge along the A449.

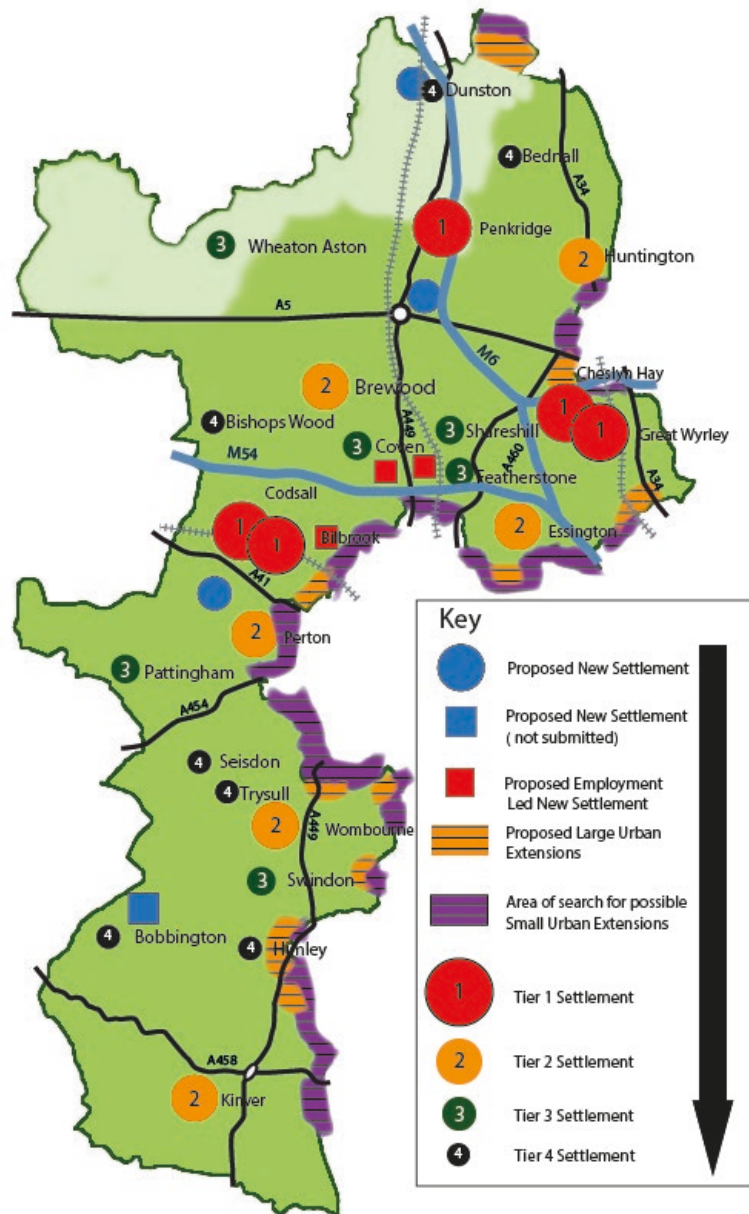


Additionally the Council has had numerous sites suggested through the Call for Sites exercise which would be capable of accommodating smaller freestanding villages of around 1,500 dwellings, which reflect the Government’s threshold for considering garden village proposals and the Council’s Strategic Housing and Economic Land Availability Assessment (SHELAA).

Therefore, given the potentially significant supply which could be realised if one or more of these sites are brought forward, it is important for the Council to test these options through the Local Plan process.

Option F: Introduce minimum housing densities on all housing sites and intensify development within the existing village development boundaries

Before releasing further land outside of the village development boundaries the Council will need to fully consider the extent of non-Green Belt land available within its existing villages. It will also need to consider how to efficiently deliver housing on any site in the Green Belt or wider Open Countryside to minimise the amount of land released in these locations. The HMA Strategic Growth Study recommends that additional supply could be realised across the HMA if a minimum density standard of 35 dwellings per hectare is adopted in authorities such as South Staffordshire, although this is of limited benefit in the context of existing supply within South Staffordshire.



Going forward the Council could consider whether to introduce minimum densities for new housing developments having regard to factors such as the recommendations of the HMA Strategic Growth Study, density standards used in the Council’s Strategic Housing and Economic Land Availability Assessment (SHELAA) and the location of the site. It is also important to note that the district’s existing settlements have different characters and scales and numerous villages contain Conservation Areas which may be sensitive to overly dense development.

Employment – locations for growth

- 5.14 Employment growth in the district has previously been focused on existing sites within the Main Service Villages, although the current Core Strategy also supported the principle of modest extensions to freestanding strategic employment sites at i54 South Staffordshire, ROF Featherstone, Four Ashes and Hilton Cross. This strategy sought to locate new employment opportunities in locations that were easily accessible from the Strategic Road Network and attractive to regional investment. However, many of these sites are also isolated from the district’s existing villages and the identification of these locations for employment growth in the Core Strategy relied in part upon the sites’ existing employment land options and planning permissions. This therefore raises questions as to whether or not they are best suited to meet the district’s own employment needs, particularly as some of the four strategic sites (such as i54 South Staffordshire) are directly adjoining the urban area of Wolverhampton. Whilst the Council’s adopted Core Strategy also encourages employment growth to be pursued through new mixed use schemes in the district’s larger villages, to date no employment land has come forward as part of a mixed use scheme in these locations due to a lack of evidence that it is needed in these locations.
- 5.15 Now that the Council is in a position to review its spatial strategy for employment, there is the opportunity to consider whether the existing approach of focusing all employment growth around the four freestanding strategic employment sites is still appropriate. In doing so, it is important to take account of the wider employment needs of the Functional Economic Market Area (FEMA) that South Staffordshire is part of (including South Staffordshire, Cannock and the three Black Country authorities of Walsall, Wolverhampton and Dudley). In particular the unmet employment needs arising from the Black Country (see Para 4.24).

Policy Options

Table 8: Employment locations for growth policy options

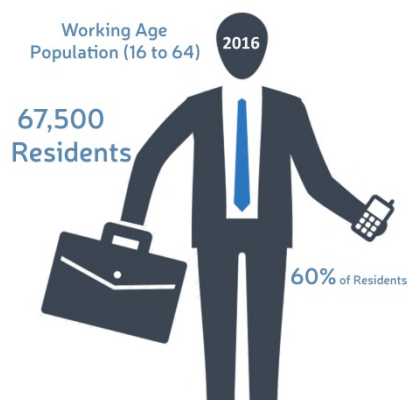
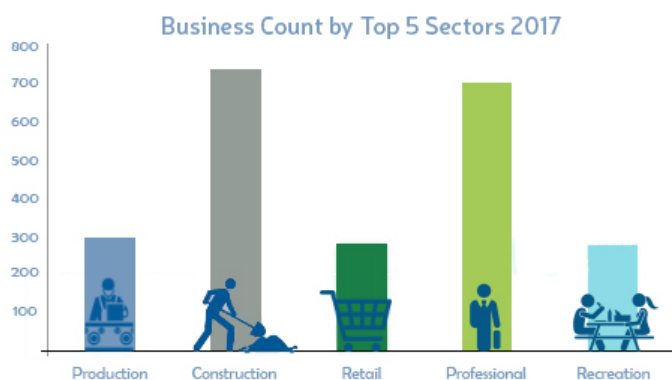
<p>Option A: Continue with the existing policy approach and focus employment growth around the four existing freestanding strategic employment sites (ROF, i54, Hilton Cross and Four Ashes).</p>
<p>This strategy would seek to address needs in these existing employment sites, which have good road access to the Strategic Road Network and have proved to be attractive to the market in the past. However, these locations are often relatively isolated from the villages which house the district’s existing population and are often located closer to adjoining urban areas. Many of these sites have also received significant extensions in recent years, meaning that there may be limited scope to release further additional land in these locations.</p>
<p>Option B: Identify new freestanding employment sites</p>
<p>This would seek to address employment needs on new freestanding employment sites. Such sites could potentially be of a specified minimum size and be based on specific spatial characteristics (e.g. access to the Strategic Road Network, proximity to workforce etc.) to ensure they are more sustainable and likely to attract investment.</p>
<p>Option C: Deliver smaller scale employment allocations in the district’s larger villages.</p>
<p>This strategy would seek to address needs in locations which may be more closely located to the district’s residents; potentially reducing commuting and ensuring local employment needs can be met in a more sustainable manner. However, despite such an approach being supported in the existing Core Strategy, to date there has been relatively little market interest in delivering such sites.</p>

**Option D:
Deliver employment allocations of part of mixed-use schemes**

This could see new employment focused at large strategic allocations such as new settlements and Sustainable Urban Extensions. This strategy would seek to address needs in locations which may be more closely located to the residents of neighbouring authorities. This may be an appropriate option if such sites are located adjacent to neighbouring authorities with unmet employment needs. However, this would mean that such sites may be less appropriate for meeting the employment needs of the district’s existing residents.

Question 20:
Which of the above option(s) do you think should be pursued? Are there any other options to consider, including a strategy which aims to provide a mixture of the spatial options set out above?

Question 21:
If it is appropriate for the Council to consider the delivery of new freestanding strategic employment sites, what criteria should be used in identifying new strategic sites for employment growth?



Mining and quarrying 40	Manufacturing 4,500	Electricity, gas, steam and air conditioning supply 10	Water supply; sewerage, waste management and remediation activities 350	Construction 3,000	Wholesale and retail trade; repair of motor vehicles and motorcycles 5,000	Transportation and storage 1,500	Accommodation and food service activities 2,500	Information and communication 500
Financial and insurance activities 500	Real estate activities 400	Professional, scientific and technical activities 2,500	Administrative and support service activities 2,250	Public administration and defence; compulsory social security 1,250	Education 3,000	Human health and social work activities 3,000	Arts, entertainment and recreation 800	Other service activities 500

6. Methodology – preferred spatial distribution and sites for development

Selecting the preferred spatial distribution

- 6.1 The Local Plan will need to decide how much of the development is to be apportioned between the broad locations which have the potential to accommodate future growth. In determining which of the options should form the preferred spatial strategy to be taken forward, the Council will have regard to a number of factors. These considerations are set out below, and reflect the key requirements in national policy which will have the greatest effect on the district's ability to accommodate growth:
- SHELAA - availability of sites in broad locations (e.g. within existing village development boundaries, sites in village edge locations, sites adjacent to neighbouring urban edges, new settlement options, strategic employment site options)
 - Rural Services and Facilities Audit 2018
 - HMA Strategic Growth Study recommendations
 - Green Belt purposes performed in a broad location (if any), informed by a cross-boundary Green Belt Review (prepared with the Black Country authorities)
 - Infrastructure provider comments on capacity and needs of broad locations, including capacity of the highways network
 - Key environmental constraints (e.g. presence of historic and natural environment assets, best and most versatile agricultural land, flood risk, local and national landscape designations)
 - The local housing needs within South Staffordshire
 - Sustainability Appraisal of Spatial Distribution Policy Options

Question 22:

Has the Council identified the key factors which should inform which of the Spatial Distribution Policy Option(s) is taken forward in the Local Plan review? If not, what other factors should inform the spatial distribution of development?

Selecting preferred sites

- 6.2 It is important that the Local Plan takes an evidence based approach to identifying the most appropriate sites for housing, Gypsy and Traveller pitches, employment sites and any other types of development that the Local Plan needs to allocate. The credentials of sites will be considered against a number of material planning factors on a consistent basis to determine the 'best' performing sites – and therefore the most suitable for development.
- 6.3 Whilst national planning policy is not explicit on how to select sites for development, it does provide some guidance for assessing housing sites in the Strategic Housing and Economic Development Land Availability Assessments (SHELAA), which we are required to produce to assess which sites are suitable, available and achievable. The SHELAA will be the starting point for site selection by filtering out the sites classified as unsuitable. It is then proposed that the identification of the preferred spatial strategy informed by a sustainability appraisal, site

availability and other evidence will enable sites to be ‘filtered’ to arrive at a shortlist of site options. These sites will then be taken forward for consistent assessment against a number of site selection criteria, using the latest evidence wherever possible.

6.4 It is our view that the factors that should govern the selection of sites at this stage are:

- Local Green Belt review (including availability of non-Green Belt options)
- Landscape Sensitivity Study
- Sustainability Appraisal findings
- Conformity with preferred Spatial Strategy
- Key environmental constraints (e.g. impact upon designated historic and natural environment assets, best and most versatile agricultural land, flood risk etc.)
- Loss of other uses (e.g. employment sites/community facilities)

6.5 Following assessment of sites against these factors it will be important to ‘sense check’ the preferred sites against a number of factors to identify opportunities and constraints including opportunities for compensatory measures including Green Belt offsetting. In our view, factors that will need to be considered include:

- Cannock Chase SAC evidence base
- Local road network capacity
- Viability Study
- Proximity to amenities/public transport
- Access to the site
- Environmental health considerations

6.6 For employment allocations, it is proposed that additional factors may be more appropriate in selecting sites. Particularly for high quality employment such as advanced manufacturing, business will often require specific site characteristics in their search for an appropriate site, with good access to the strategic road network a key factor. It is therefore proposed that the Economic Development Needs Assessment (EDNA) (incorporating local market analysis) will play an important part in providing the evidence needed to select sites for employment use. It is proposed that part 2 of the EDNA will assess site options for employment use against a consistent set of criteria and the recommendations from this will form the starting point for selecting sites for employment, considered in the round with other factors such as those outlined at paragraph 6.1, including the Green Belt review and sustainability appraisal.

Question 23:

Do you agree that the factors above represent the key considerations for selecting the preferred sites?

Question 24:

In addition to the factors set out above, are there any other material planning considerations which should be used to for selecting sites? If yes, then please provide details.

Question 25:

Are any of the factors more important than others for identifying sites for development, and should these have greater weighting in site selection process? If yes, then please provide details.

Question 26:

Should sites only be taken forward for consideration where they are large enough to accommodate 10 or more dwellings - above the Government's threshold at which we can ask for on-site Affordable Housing? If yes, is there any conflict with this approach and the national requirement for 10% of sites in the Plan to be on sites of 1ha or less?

Question 27:

Should different factors be used for site selection depending on the use? For example, should different factors be used for identifying the best locations for employment sites or Gypsy, Traveller and Travelling Showpeople pitches/plots?

7. Homes and Communities

Housing Mix

Key Issues

7.1 There is a significant mismatch between the district’s existing housing stock and future housing need.

- Approximately 80% of housing stock in the district is detached or semi-detached, and almost 70% of homes have 3 bedrooms or more (2011 Census). This contrasts with a reducing household size. Lone parent and single person households are expected to increase substantially in number over the plan period and the number of households comprising of couples with children will decrease.

7.2 The district’s rapidly ageing population creates a pressing need for housing to meet the needs of older people in particular.

- This includes specialist housing, but also smaller homes for those that are looking to downsize and do not require any additional care and support. Homes for older people and specialist housing is considered separately later in the chapter.

7.3 Housing affordability continues to be problematic for many residents.

- Households struggle to access the open market due to high house prices, creating a need for affordable housing, and also more suitable market housing options, especially for young families. Larger market properties are particularly difficult to access, with residents requiring an additional £48,000 in average household income in order to afford a 4 bedroom home, in comparison to that required for a 3 bedroom property. Affordable housing is considered later in the chapter.



7.4 The 2017 SHMA reflects these issues, indicating a need for a wide range of property sizes and tenures, but a particularly significant requirement for more 2 and 3 bedroom homes. This will address the issues above and provide housing that better suits the needs of South Staffordshire’s residents.

Existing Policy

National Policy

7.5 The NPPF requires local authorities to assess and identify the size, type and tenure of homes required for different groups, to support strong, vibrant and healthy communities. The Government’s 2017 Housing White Paper draws particular attention to housing for older people, encouraging local authorities to assist such households in downsizing by ensuring appropriate housing is provided to allow them to do so.

Local Policy

- 7.6 The Council’s current adopted housing mix policy (Core Strategy Policy H1) aims to achieve a better balanced housing market, by requiring new housing developments to provide a variety of housing sizes, types and tenures. There is particular emphasis on providing more 2 and 3 bedroom homes in all areas of the district, and strong support for housing to meet the needs of the district’s ageing population. Housing mix should reflect local housing need information, including the latest SHMA; however no specific proportions are specified in the policy itself.

Policy Options

Table 9: Housing mix policy options

<p>Option A: Continue with current policy of encouraging a variety of housing options on new developments, guided by the SHMA, but in particular requiring an increased number of smaller homes.</p>
<p>This would encourage mixed and sustainable communities, providing housing for a range of household groups. Housing mix would continue to be determined via individual site negotiation, offering flexibility to local circumstances.</p>
<p>Option B: Specify more precise housing mix requirements for new developments e.g. minimum of 60% of market housing should contain 3 bedrooms or less.</p>
<p>This would ensure provision of the right types of homes for the district and would be guided by evidence in the SHMA. Such requirements could differ between localities, and would need to be viability tested, but they would provide more certainty on policy requirements for both landowners and developers.</p>
<p>Option C: On strategic allocation sites (e.g. 150+ units), agree a full housing mix breakdown for both market and affordable housing at Local Plan stage.</p>
<p>This would ensure significant housing sites provide an appropriate housing mix to contribute to the need identified in the SHMA. The mix would form part of the site’s individual viability assessment where applicable.</p>

Question 28:

Which of the above option(s) do you think should be pursued? Are there any other options to consider?

Homes for older people and specialist housing

Key Issues

- 7.7 There is an increasing pressure from the district’s ageing population and a local shortage of housing for older people, including specialist and supported homes.
- Between 2014 and 2036, the number of people in South Staffordshire aged 65+ will increase by approximately 48%. The 2017 SHMA indicates a need for 628 additional specialist housing units over the same period, including a mixture of market and affordable units, ranging from sheltered to extra care accommodation.

7.8 For some residents, remaining in their own home with appropriate care and support makes a better contribution to their health and wellbeing.

- Older people and other groups in the community with lower level care needs can experience both physical and mental health benefits from living longer in their own property. New housing therefore needs to be futureproofed; designed in a way which allows for a range of housing needs to be met. With increasing demand for disabled adaptations in the district, an efficient use of the Better Care Fund can also be achieved if homes are built to easily allow for alterations to be made when needed.

7.9 Better housing options are also required for other groups of the community, in addition to the ageing population.

- The 2017 SHMA highlighted small proportions of the district's population with other health issues, including physical disabilities, learning disabilities and mental health disorders. There are a small number of schemes in the district to meet specific needs such as these, and opportunities to further increase provision should continue to be maximised.

Existing Policy

National Policy

- 7.10 The NPPF requires local authorities to meet the housing needs of a range of groups in the community such as older people and residents with disabilities. There is also a drive to create healthy, inclusive, safe and accessible communities. Local authorities are no longer permitted to require any additional local technical standards on new housing, with the exception of optional standards in Part M4 of the Building Regulations relating to accessibility, adaptability and wheelchair users. Part M4(2) standards ensure that homes are adaptable (e.g step free access can be implemented); whereas the higher Part M4(3) standards requires a home to be built to a standard where wheelchair access is already in place. Part M4(3) standards should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling. The NPPF confirms that local authorities should make use of the optional technical standards where this would address an identified need for such properties.

Local Policy

- 7.11 Policies H1 and H5 of the adopted Core Strategy support all types of specialist housing to meet the needs of different groups of the community, but particularly for the ageing population. This is providing that new developments are in sustainable locations, and previously developed land or redevelopment schemes are considered as a priority. There are no specific percentage or threshold requirements for new residential developments to provide any specialist homes as part of the wider scheme. The Council's policy to require all housing to be built to Lifetime Homes Standard has now been superseded by national policy as outlined above.

Policy Options

Table 10: Specialist housing policy options

<p>Option A: Continue with existing positive policy which supports specialist housing and resists proposals for loss of specialist accommodation.</p>
<p>This would ensure flexibility for types of provision to be provided, but also provides less clarity for developers and landowners on what the Council’s expectations are on larger sites. The number of homes provided for older people and other groups would be determined by negotiation on a site by site basis.</p>
<p>Option B: Specify a percentage requirement of homes for older people e.g. bungalows, retirement apartments etc., including market and affordable options.</p>
<p>This would provide certainty to developers and landowners on policy requirements. The requirement would need to be viability tested and may impact on other elements of a scheme e.g. housing mix, affordable housing.</p>
<p>Option C: Allocate sites, or parcels within larger strategic sites (e.g. 150+ units), specifically for specialist housing.</p>
<p>This may require further evidence gathering and master planning to identify the most suitable location(s). Provision would be secured at an early stage (i.e. plan adoption) providing greater certainty of meeting specialist needs of residents, as evidenced in the SHMA.</p>
<p>Option D: Specify a percentage requirement of homes to be built to the optional higher technical standards.</p>
<p>This may have similar impacts to Option B. Consideration could also be given to a hybrid option which allows developments to meet either Option B or D. This leaves more flexibility for negotiation and taking local circumstances into consideration on a site by site basis. These additional access standards would be enforced through Building Control.</p>

Question 29:

Which of the above option(s) do you think should be pursued? Are there any other options to consider?

Affordable housing

Key Issues

7.12 **There are widespread affordability issues across the district, leaving home ownership out of reach for many residents.**

- Private rent levels and open market house prices continue to rise, with the average property price for the district rising by approximately 22% over the last 5 years. The 2017 SHMA indicated that residents require a disproportionately higher income in order to afford to buy a property, compared to a private or affordable rented home. The assessment recommended provision of a profile of housing over the plan period which includes approximately 29% affordable housing. This consists of homes for rent, shared ownership, and discounted market housing including starter homes. There may be a

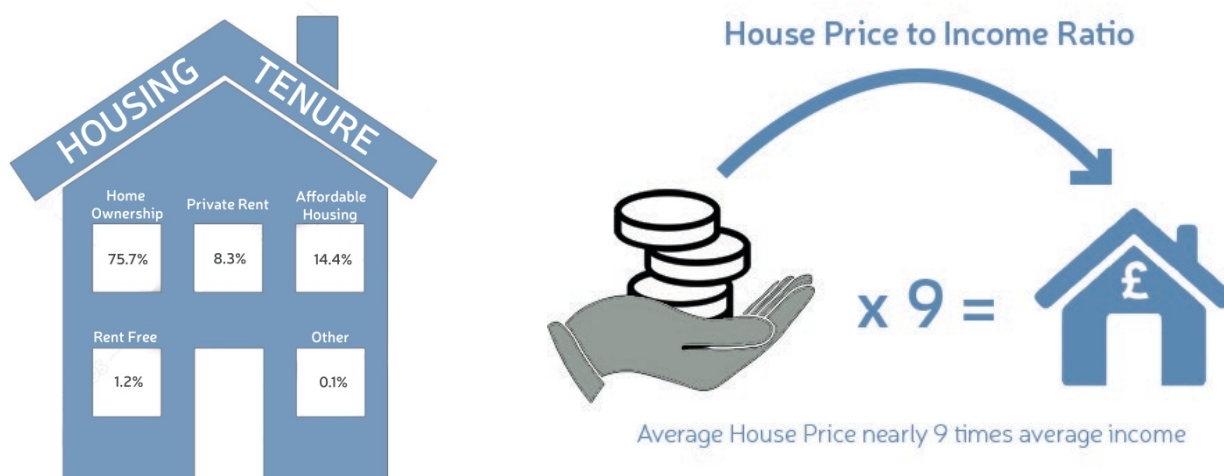
need to update Part 2 of the SHMA, to base requirements on the standardised OAN figure and more closely reflect the revised NPPF definition of affordable housing.

7.13 There are varying levels of need for different tenures, with the most pressing need across the district for social and affordable rented homes.

The affordable housing need for the district is split between the following tenures:

Table 11a	Percentage of total housing need	As proportion of affordable need
Social/Affordable Rent	14%	48%
Shared Ownership	8%	28%
Discount market housing including starter homes	7%	24%
Total	29%	100%

7.14 Almost half of the total affordable housing need is for affordable housing for rent, with the remainder attributed to affordable routes to home ownership. There is a slightly higher need for shared ownership, and the SHMA highlighted issues around affordability for discount market housing in the district. For example, certain sizes of starter home would be more expensive on a monthly basis, compared to an entry level property from existing housing stock of an equivalent size on the open market.



7.15 The level and type of affordable housing need varies across the district.

The SHMA indicated a range of needs for affordable housing in the five localities of the district:

Table 11b	Social/Affordable Rent	Shared Ownership	Discount market housing including starter homes	Total
Locality 1	14.2%	7.3%	4.8%	26.3%
Locality 2	20.4%	12.3%	6.5%	39.2%
Locality 3	11.0%	7.1%	6.8%	24.9%
Locality 4	16.5%	7.6%	11.6%	35.7%
Locality 5	15.1%	10.8%	6.0%	31.9%

- 7.16 There are opportunities to secure a proportion of affordable housing for those with a local connection to South Staffordshire through implementing nomination agreements with the district’s local Registered Providers.

Existing Policy

National Policy

- 7.17 The NPPF requires local authorities to identify the level, size, type and tenure of homes required to meet the needs of those requiring affordable housing. Affordable housing contributions should only be sought on major developments i.e. sites of 10 or more dwellings, or with a site area of 0.5 hectares or more.
- 7.18 The NPPF definition of affordable housing has recently been widened to incorporate a number of home ownership options. Four categories now exist consisting of: affordable housing for rent, starter homes, discounted market sales housing, and other affordable routes to home ownership. On major developments, 10% of homes should be provided as affordable home ownership, as part of the overall affordable requirement.
- 7.19 The NPPF confirms that development contributions should be set out in the local plan and should not undermine deliverability. Planning applications that comply with such policies should be assumed to be viable. It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at application stage and the decision maker must decide what weight to attribute to it.

Local Policy

- 7.20 The Council’s current policy for determining whether affordable housing is required on new developments is based on the existing settlement hierarchy. On qualifying smaller sites, a 20% contribution is required, and in terms of larger sites, 30% is required on previously developed land, and 40% on greenfield sites.
- 7.21 Where affordable housing is required, the Council’s current policy requires this to be split 50:50 between social rent and what was previously defined as intermediate tenure i.e. shared ownership. Offsite and financial contributions in lieu of onsite provision are only considered in exceptional circumstances.
- 7.22 Much of this policy is now out of date following changes to the NPPF, and therefore needs updating to reflect current national policy.

Policy Options

Table 12: Affordable housing percentage requirement policy options

<p>Option A: Set a district wide affordable housing requirement on sites of 10 units or more, as guided by the SHMA.</p>
<p>Setting the requirement at slightly higher than the SHMA need (e.g. 30%) would balance out the lack of affordable homes provided on smaller sites. A requirement slightly lower than the SHMA need (e.g. 25%) may better secure affordable housing delivery overall. A percentage requirement will need to be viability tested, and the appropriate level of affordable housing need may need to</p>

be confirmed by updating Part 2 of the SHMA.
Option B: Set different affordable housing requirements for different areas of the district to reflect varying levels of viability and need, as guided by the SHMA.
The requirement could be divided into two groups based on SHMA findings e.g. localities 1 and 3 with a 25% requirement, and localities 2, 4 and 5 with a 35% requirement. This would be subject to viability testing and makes implementation slightly more complex.
Option C: Implement specific percentage requirements for individual strategic sites (e.g. 150+ units)
This would reflect local circumstances of larger schemes and be subject to viability testing on a site-by-site basis.

Question 30:
Which of the above option(s) do you think should be pursued? Are there any other options to consider?

Table 13: Affordable housing tenure split policy options

Option D: Adopt a similar approach to the current policy, with a simple 50:50 split between affordable housing for rent and affordable home ownership.
This would offer substantial flexibility and may require site-by-site negotiation to determine the specific tenures to be provided within these two categories. There would be less certainty that the types of affordable homes that are actually needed will be provided.
Option E: Consider a more detailed tenure split which confirms specific tenures to be provided and the level required.
An example of this could be a 50:50 split which requires the rented proportion to be provided as social rent, and at least half of the affordable home ownership provision to be for shared ownership. This provides clarity on the Council's expectations and security of provision of homes that people really need. An updated SHMA would guide the detail of such requirements, based on analysis of the relative affordability of different products e.g. social vs affordable rent.
Option F: Implement specific tenure split requirements for individual strategic sites (e.g. 150+ units)
This would reflect local circumstances of larger schemes and be subject to viability testing on a site-by-site basis.

Question 31:
Which of the above option(s) do you think should be pursued? Are there any other options to consider?

Table 14: Affordable housing boosting supply policy options

Option G: Allocate additional small sites for 100% affordable housing in the local plan in order to boost supply and enhance the vitality of the district's smaller settlements.
The settlement hierarchy would guide which settlements may benefit the most from such developments and further evidence would need to be gathered to justify the allocations. Smaller sites would assist in maintaining the Council's 5 year housing land supply.

Option H:

Adopt an Affordable Housing SPD to further clarify the Council's expectations for the delivery of affordable housing.

This could cover issues around distribution, design, nominations and financial contributions for affordable housing.

Question 32:

Which of the above option(s) do you think should be pursued? Are there any other options to consider?

Rural exception sites

Key Issues

7.23 Affordable housing is needed in order to sustain the district's villages and local communities, particularly the smaller settlements in lower tiers of the hierarchy.

- Affordability issues are forcing young people to move away from the villages they grew up in because they are unable to find a home which they can afford in their local area. This increases the risk of local shops and services failing as they cannot be sustained financially. Providing affordable housing in rural communities helps to prevent this from happening, and also allows younger people to live nearby to friends and family to support each other. This is especially important given the district's ageing population.

7.24 Rural exception sites have historically proved difficult to bring forward in the district.

- Since the adoption of the Core Strategy in 2012, only two rural exception sites have been delivered in the district (Pattingham and Huntington). The level of affordable housing need identified in the 2017 SHMA suggests there are significant opportunities in many villages to deliver affordable homes through this mechanism; however, there appears to be certain issues preventing this from happening. The process by which rural exception sites are brought forward is resource intensive and time consuming for all those involved.

Existing Policy

National Policy

- 7.25 The NPPF encourages rural authorities to meet local need for affordable housing through rural exception sites. Consideration should also be given to incorporating an element of market housing in order to facilitate such schemes.

Local Policy

- 7.26 The Council allows rural exception sites to be brought forward on land in both the Green Belt and Open Countryside, subject to certain criteria. Homes must be secured as affordable and for local people in perpetuity. Housing associations are encouraged to work closely with the Parish Council to commission a Parish Needs Survey to demonstrate local need and then

subsequently identify an appropriate site or sites for the development. Market housing to cross-subsidise the affordable homes on the site is permitted in the Open Countryside only.

Policy Options

Table 15: Rural exception sites policy options

<p>Option A: Continue with existing rural exception site policy.</p>
<p>The current policy protects the Green Belt from market housing on rural exception sites, and secures any affordable housing delivered through such a scheme for local people via local connection criteria laid out in a Section 106 agreement. The Council would expect the delivery of rural exception sites to be maintained at their current low rate.</p>
<p>Option B: Adapt the policy to widen the evidence base required to demonstrate a need for a rural exception site, rather than a Parish Needs Survey only.</p>
<p>This could include information gathered by the district Council, data on a registered provider’s housing register or other robust evidence. Requirements could be put in place for the methodology of the needs assessment to be agreed with the district Council, and for it to assess all types of affordable housing need, rather than just a single tenure. This would help to secure mixed developments that provide genuinely affordable homes for residents. This approach would continue to see the homes provided for local people secured through a Section 106 agreement.</p>
<p>Option C: Consider allowing an element of market housing on rural exception sites in the Green Belt in order to cross-subsidise the affordable homes.</p>
<p>This may assist in bringing more sites forward. Appropriate safeguards could be contained within the policy, such as a limit on the proportion of market housing provided (e.g. 20%) and a requirement to provide evidence that market units are essential to support the financial viability of the scheme.</p>

Question 33:

Which of the above option(s) do you think should be pursued? Are there any other options to consider?

Entry level exception sites

Key Issues

7.27 There is a new national requirement for local authorities to consider the development of entry level exception sites.

- Such exception sites will in principle be acceptable in South Staffordshire in the Open Countryside only and subject to the requirements in the NPPF outlined below. Such development in the Open Countryside should provide sufficient benefit to the local community i.e. homes need to be genuinely affordable for residents and secured for local people where possible.

Existing Policy

National Policy

- 7.28 The revised NPPF introduces the entry level exception site policy. These are sites on land not already allocated for housing, which comprise of homes for either first time buyers, or those looking to rent their first home, unless this need is already being met within the area. Homes should be affordable (as defined in Annex 2 of the NPPF), and sites should be adjacent to existing settlements, proportionate in size to them (i.e. no larger than one hectare in size or exceed 5% of the size of the existing settlement) and not compromise areas or assets of particular importance e.g. the Green Belt. Local design policies should also be adhered to.

Local Policy

- 7.29 This is a new national policy therefore the Council does not currently have an adopted entry level exception site policy.

Policy Options

Table 16: Entry level exception sites policy options

<p>Option A: Do not adopt a policy on entry level exception sites and rely on NPPF for determining applications for such proposals.</p>
<p>Applications would be judged against the relevant provisions in the NPPF on entry level exception sites, and any other relevant policies in the local plan e.g. housing mix.</p>
<p>Tenure Split</p>
<p>Option B: Set out specific requirements for the sites to provide a mix of affordable housing tenures, as led by a housing needs assessment, agreed with the Council.</p>
<p>This would more likely secure homes that are genuinely affordable, rather than a scheme solely providing homes for discount sale for example. Negotiation would be required on a site-by-site basis to determine the appropriate mix. The evidence would need to be robust and agreed with the Council.</p>
<p>Option C: Adopt a tenure mix for the affordable housing on the sites which mirrors the general affordable housing policy.</p>
<p>For example, this could be a 50:50 split between affordable housing for rent and affordable routes to home ownership. This would provide more consistency with other policies in the plan, whilst also providing a range of housing options to meet local need.</p>
<p>Local Connection</p>
<p>Option D: Implement local connection criteria in perpetuity on the sites as with rural exception sites.</p>
<p>This would restrict occupation of the units to those with a close connection to the parish in which the development is located. The homes would therefore be safeguarded to meet the housing needs of local residents.</p>

Question 34:

Which of the above option(s) do you think should be pursued? Are there any other options to consider?

Self-build and custom housebuilding

Key Issues

7.30 There is a relatively low need for self-build and custom housebuilding plots in the district.

- The Council introduced a register on 1st April 2016 for those interested in building their own home in the district. To date, there have only been 11 entries added to the register. Whilst this need is fairly low, the Council still has a statutory duty to meet the need identified on the register, as outlined below.

7.31 The Council owns very little land in the district to meet the identified need.

- This lack of land provides few opportunities for the Council to proactively provide plots for those on the register. A mechanism therefore needs to be put in place for plots to be provided in other ways.

Existing Policy

National Policy

7.32 Local planning authorities are required to meet the needs of people wishing to build their own homes, as part of their wider duty through the NPPF to provide a range of housing types and tenures for different groups of the community. The Self-build and Custom Housebuilding Act 2015 introduced a requirement for local authorities to keep a register of those looking to build their own home in their area. This register must be publicised and councils should have regard to it in plan-making.

7.33 The Housing and Planning Act 2016 introduced further duties for local authorities to grant planning permissions for enough plots in order to meet the need identified on the register. Councils have three years to meet the need arising in the previous year.

Local Policy

7.34 A local connection eligibility criterion was implemented by the Council on 1st April 2017, meaning that only those entries on the register with a close connection to the district will be considered when establishing local need for self-build and custom housebuilding.

7.35 The Council's adopted Core Strategy contains no specific policy relating to self-build and custom housebuilding. The Site Allocations Document (SAD) does confirm in Policy SAD9 that sites should have regard to the register in determining an appropriate housing mix.

Policy Options

Table 17: Self and custom house building policy options

<p>Option A: Continue with the current policy approach and include appropriate provisions within the Housing Mix policy for new development to have regard to the self-build and custom housebuilding register, as per Policy SAD9 of the Site Allocations Document.</p>
<p>The number of plots to be provided on new housing sites would be established by negotiation on a site-by-site basis. This provides flexibility but less certainty on meeting the need identified on the register.</p>
<p>Option B: Specify a percentage requirement of serviced plots for self and custom housebuilders.</p>
<p>Such a policy would secure a supply of plots throughout the plan period. Future need would have to be estimated based on the current register and any requirements would be viability tested. Provisions could be included to allow plots to be converted to general market housing should there be no take-up in a given period.</p>
<p>Option C: Allocate small sites, or parcels within larger strategic sites (e.g. 150+ units) specifically for self-build and custom housebuilding.</p>
<p>This provides greater certainty of provision. Design codes could be used to ensure dwellings are built to a suitable specification. There may also be opportunities to incorporate this option with the NPPF requirement to ensure at least 20% of allocated sites are of half a hectare or less.</p>

Question 35:

Which of the above option(s) do you think should be pursued? Are there any other options to consider?

Question 36:

If a threshold was set as per Option B, what would be an appropriate threshold where plots should be provided?

Gypsies, Travellers and Travelling Showpeople

Key Issues

7.36 There is an identified need for additional pitches to meet the needs of Gypsies and Travellers.

- The 2017 SHMA includes an updated Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTTSAA) and identifies a need for 87 additional residential pitches for Gypsies and Travellers, and an additional 3 plots for Travelling Showpeople up to 2036.

7.37 The locations of existing Gypsy and Traveller sites are often in rural locations in the Green Belt.

- Historically, the location of existing Gypsy and Traveller sites in South Staffordshire was established through the planning applications process – each case on its merits. Sites are often in rural locations, and a large proportion of sites are concentrated relatively close to the strategic transport network in the north of the district. All sites are located in the Green Belt.

7.38 Does the change in national planning policy definition affect any families in South Staffordshire?

- In 2015, the Government amended national policy to change the planning definition of Gypsies and Travellers for planning purposes to state that if families have ceased travelling permanently they no longer fall within the planning definition. The Council therefore needs to consider whether any families fall within this definition.

7.39 There are no public traveller sites in South Staffordshire.

- All existing sites in South Staffordshire are privately owned and there continues to be little or no appetite for new public sites, with a clear preference from the existing community for permanent residential pitches. There are 20 authorised transit pitches across the district, but these are on privately owned sites.

7.40 Further engagement with the existing community will in part seek to address the issues above and provide pitches in locations that suit the needs of South Staffordshire’s traveller communities.

Existing Policy

National Policy

7.41 In August 2015, the Government issued a revised national Planning Policy for Traveller Sites (PPTS) which needs to be read in conjunction with the National Planning Policy Framework (NPPF). It confirms that Local Planning Authorities (LPAs) should set pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople which address the likely permanent and transit accommodation needs.

Local Policy

7.42 The Council’s current adopted Gypsy, Traveller and Travelling Showpeople policy (Policy H6) includes detailed criteria for determining planning applications for new pitches, as well as for allocating sites in the Plan. Core Strategy Policy H6 also set the district’s pitch and plot requirements up until 2028 and was informed by the latest evidence at the time – the 2008 Gypsy and Traveller Accommodation Assessment (GTAA). The GTAA established the need for future pitches on a ‘need where need arises’ approach, with policy H6 requiring new pitch locations to be established in the first instance through engagement with existing sites. This was the approach taken for allocating sites through the SAD, with all allocations representing an intensification or extension of existing sites to meet an existing family need.

Policy Options

Table 18: Gypsies, Travellers & Travelling Showpeople policy options

<p>Option A: Continue with current criteria based policy approach of seeking to meet pitch needs where local family need arises</p>
<p>This would allow pitches to be allocated where existing communities are meeting their expanding family need. This could include intensification of existing sites (where possible), conversion of temporary permissions to permanent and/or extensions to existing sites.</p>
<p>Option B: Look to allocate new private sites in sustainable locations</p>
<p>This would look to deliver a balance of new private sites across the district, and seek to identify traveller sites that are not greenfield, Green Belt in the first instance. This could include sites as part of larger housing or mixed use developments.</p>
<p>Option C: Look to allocate a public site(s) in a sustainable location, including consideration of cross-boundary options</p>
<p>This would look to deliver a new public site(s) in a sustainable location, and seek to identify traveller sites that are not greenfield, Green Belt in the first instance. This could include sites as part of larger housing or mixed use developments. Historically, evidence gathering and discussions with traveller families has revealed very little support for publicly run sites.</p>

Question 37:

Which of the above option(s) do you think should be pursued? Are there any other options to consider?

Question 38:

Do you consider there to be any specific criteria that should be used for identifying Travelling Showpeople plots?

Question 39:

Should pitches be allocated based on a split between those travellers that meet the PPTS definition, as well as those that fall outside the PPTS definition?

Question 40:

Are the existing criteria in Policy H6 still appropriate for assessing planning applications for Gypsy and Traveller and Travelling Showpeople sites/plots? Should the same criteria be used for identifying the sites/plots to allocate in the new Local Plan?

Design and residential amenity

Key Issues

7.43 To ensure design quality plays a more central role in the Local Plan review.

- Design is a key issue for local Members and residents and currently is primarily dealt with through the Development Management process with reference to Local Plan policies and Design Guides. The Local Plan review could provide an opportunity to strengthen policies on design by introducing new tools such as master planning and the use of design codes.

7.44 To preserve and enhance the local character and distinctiveness of South Staffordshire.

- South Staffordshire is a rural district which is characterised by a network of historic villages, buildings, landscapes, and other settlements. There is a need for future development to be provided in a sustainable way which is sensitive to the local character, vernacular, landscape, and setting of the area.

7.45 To ensure that the design of new development contributes to the health and wellbeing of the communities who live there, including adapting to a changing environment and energy conservation measures.

- Good design can play an important role in contributing to the health agenda and improving an individual's wellbeing, as well as supporting energy conservation. As part of this, measures including aspect of homes, layout and orientation, using natural light and ventilation and futureproofed housing that allows for easy adaptation can be simple cost effective measures that can improve an individual's wellbeing in the home. Wider scheme design that enables easy and safe access to green infrastructure also has positive health benefits. Energy conservation and health and wellbeing are considered separately in later chapters.

Existing Policy

National Policy

- 7.46 National policy requires plans to set out a clear design vision and expectations so applicants have certainty on what is likely to be acceptable, using visual tools such as design guides and design codes. These should provide a framework for creating distinctive places with a consistent and high quality standard of design. It confirms that Local Plans should offer comprehensive policies that allow for new developments to function well, establish a strong sense of place, and allow for mixed use schemes that support local facilities and transport networks. It requires that policies also have regard to local character and history, as well as to creating a safe and accessible environment.

Local Policy

- 7.47 The Council's currently adopted policies in regard to design and amenity are expressed in Core Policy 4 - Promoting High Quality Design. This confirms that support will be given to proposals that achieve a high standard of design of buildings and their landscape setting, in order to

create a high quality environment. It requires that designs provide an attractive, functional, accessible, safe, healthy, and secure environment, respecting local character, and reducing the risk of flooding. Further detail on specific design considerations are given in Policy EQ11 and the South Staffordshire Design Guide Supplementary Planning Document (SPD).

Policy Options

Table 19: Design and residential amenity policy options

<p>Option A: Continue with existing approach of having a positive policy that provides design parameters to apply on a case by case basis.</p>
<p>This would see a less prescriptive approach to individual developments, but may provide a greater level of flexibility when considering design. Greater clarity on design expectations could continue to be provided by hooking the new policy to the South Staffordshire Design Guide (or subsequent update) and requiring applications to be accompanied by a design statement. Specific reference could be made in the policy to design factors that should be incorporated into developments that would enhance health and wellbeing and energy conservation.</p>
<p>Option B: In addition to a design policy (Option A), produce Design Codes to provide clear guidelines on design expectation for new developments</p>
<p>Design Codes could be produced to guide the design of large developments such as new settlements or sustainable urban extensions, which could be informed by design principles set out in the South Staffordshire Design Guide (or subsequent updates) and Building for Life 12. These could be site specific and would take the form of both diagrammatic and written policy guidance and would need to be hooked to a new design policy in the Local Plan. These could provide a greater degree of flexibility than a prescriptive masterplan; however offer greater clarity on design expectations than relying on policies that sets out design requirements in broader terms (i.e. Option A).</p>
<p>Option C: In addition to a design policy and design codes (Option B), positively and proactively promote high quality community master planning during plan formulation on strategic sites (e.g. 150+ units)</p>
<p>This would include actively promoting (and potentially undertaking) master planning of key strategic sites. It would provide a more prescriptive approach as to how sites should be built out in terms of design, relationship to existing built and natural environment and other requirements including energy conservation measures, household types, balance of different developments, densities etc. This could take the form of both diagrammatic and written policy guidance. It would offer the potential for a greater measure of community engagement with the actual form of new development and would ensure that the Council made a positive contribution to improving the health and wellbeing of residents and communities.</p>

Question 41:

Which of the above option(s) do you think should be pursued? Are there any other options/design measures to consider?

Parking provision

Key Issues

- 7.48 **There are long standing local concerns that in many villages there is insufficient public parking for residents to access local services in the village centres, and insufficient parking available for rail commuters.**
- Parking is a key element of the Council's infrastructure agenda. New developments coming forward could lead to greater pressure for additional public parking, with many of our village centres already facing parking pressures that could have a negative effect on the local economy of these areas. There is also a lack of adequate parking around our railway stations which is exacerbated by commuters from other areas using these spaces. Despite being referenced in the current Core Strategy, there has also been an under delivery of cycle parking spaces, which if provided, may encourage local residents to leave their car at home when accessing local services.
- 7.49 **To ensure that the Council's car parking standards (setting out the level of parking required for each residential property) meets the needs of householders.**
- Changes in lifestyle preferences in recent times have seen a greater demand for cars per household with around 87% of households in the District owning a car. Therefore, it is important that the new Local Plan considers if the car parking standards in the adopted Core Strategy are still appropriate. Greater demand for additional spaces needs to be balanced with the need to encourage the use of more sustainable modes of transport.
- 7.50 **Consider the need for additional HGV parking facilities.**
- A number of key road corridors run through the district that are frequently used by HGVs, with a number of existing lorry parking facilities along these routes – in particular the A449, A460 and A5. The Government has undertaken a national survey of lorry parking which identified a shortage of lorry parking across the country, with the Midlands a particular hotspot.

Existing Policy

National Policy

- 7.51 National policy sets out what should be taken account of when setting local parking standards, including accessibility, availability of public transport and local car ownership levels. The Manual for Streets is the only guidance document on parking standards published nationally.
- 7.52 National policy does confirm that planning policies should recognise the importance of providing adequate overnight lorry parking facilities.

Local Policy

- 7.53 The current local policy on Car Parking Standards in the Core Strategy can be found under Appendix 5. These are well used by Development Management case officers and are largely based on the guidance in the Manual for Streets.

Policy Options

Table 20: Public and residential parking policy options

Public parking
<p>Option A: Allocate new public parking as part of new housing development on the edge of villages, where within walking distance of existing centres and services and facilities.</p>
<p>This approach has been taken in the Site Allocations Document (SAD) previously where additional parking provision was identified at Great Wyrley and Cheslyn Hay. Whilst this option can provide additional spaces and potential for public electric charging points, they may not be in the best location to access village services which tend to be in village centres where available land is scarce.</p>
<p>Option B: Promote sustainable transport options by allocating land solely for car parking/cycle parking within walking distance to serve our railway stations, where available</p>
<p>This approach would promote the use of train travel as a more sustainable alternative to the car. Multi story car parks could be explored under this option. Deliverability could be an issue for this option as land in village centres (or on the village edge) will attract premium value, whereby residential development will often be required to recoup the cost of the land.</p>
<p>Option C: Allocate specific areas within strategic sites (e.g. 150+ units) for parking, where new services and facilities are being provided.</p>
<p>This approach could see the opportunity to masterplan new parking facilities within larger sites that enables easy access to new services and facilities that are being provided as part of the development.</p>
<p>Option D: If the Council chooses to implement a Community Infrastructure Levy, use monies from this towards improvements to existing parking in village centres.</p>
<p>This could include reconfiguring existing parking arrangements or providing new cycle parking facilities on existing car parks. This approach may not significantly increase the number of spaces available.</p>
Residential parking
<p>Option E: Continue with the existing policy approach by adopting the same Parking and Cycling standards as expressed in the current Core Strategy</p>
<p>This would see the Parking Standards in Appendix 5 of the adopted Core Strategy carried forward to the new Local Plan. Evidence would need to be refreshed to justify continuation of these standards taking account of the factors in paragraph 106 of the NPPF.</p>
<p>Option F: To adopt a suite of improved Car Parking and Cycling Standards (including requirements for electric charging points and materials) as well as scheme design requirements to maximise off street private/communal parking.</p>
<p>Again, evidence would need to be refreshed to justify new standards. This policy could increase the number of spaces that are required per development and reduce the need for on street</p>

parking. This could include the provision of communal parking areas within developments including making provision for people with disabilities and/or mobility issues. A requirement for electric charging points within these communal parking areas could also be specified.

Question 42:

Which of the above option(s) do you think should be pursued? Are there any other options to consider?

Question 43:

Should we allocate new HGV parking and if so what evidence would need to be prepared to inform this? If a need for additional facilities were identified, should there be a focus on extending existing facilities, or should wholly new facilities be identified?

Space about dwellings

Key Issues

7.54 **Consider what space about dwellings standards should be set out in the Local Plan.**

- Given the need for new housing in the district it will be essential to ensure that developments are sustainable in the long term and are places where people wish to live work and play, rather than having no other choice. This is an important aspect of their overall health and wellbeing. In order to do this a good standard of spacing around dwellings needs to be achieved, which considers factors such as privacy, safety, energy conservation, crime prevention, daylight, and outlook.

Existing Policy

National Policy

7.55 There is currently no national policy or guidance which specifically deals with space about dwellings. However, national policy does reference the importance of creating a high standard of amenity for existing and future users.

Local Policy

7.56 The current Core Strategy contains Space about Dwellings Standards that were heavily influenced by the Staffordshire Residential Design Guide and are well used by Development Management case officers.

Policy Options

Table 21: Space about dwellings policy options

Option A:

Continue with existing policy approach by maintaining the current standards as set out in the adopted Core Strategy.

This would see the standards in Appendix 6 of the adopted Core Strategy taken forward to the new Local Plan.

Option B:

Adopt a suite of improved Space about Dwelling standards that provide more clarity, including through the publication of an SPD.

This approach would see a review of current standards. The current standards regarding access to daylight for example state that design and layout of new buildings should maximise sunlight with habitable windows not facing north. This policy could be made more explicit by stating, for example, that a 45 degree angle should be maintained from the midpoint of rear gardens if a new property was to be built to the rear of it. This would ensure that some daylight is always guaranteed. This could encourage the use of gardens as a place of exercise and relaxation leading to wider health and wellbeing benefits. The minimum distances between dwellings could also be reviewed and this would need to be considered in relation to the Council's approach to density.

Question 44:

Which of the above option(s) do you think should be pursued? Are there any other options/design measures to consider?

Internal space standards

Key Issues

7.57 **Ensure that homes are built to appropriate standards with an acceptable level of internal space; ensuring homes are flexible and adaptable for the future so as not to adversely impact individuals' health and wellbeing.**

- There are clear links between an individual's living environment and their health and wellbeing, therefore it is important that local policies are introduced that create a built environment that reflects good design principles, both externally and within the confines of the home.

Existing Policy

National Policy

7.58 In 2015 the Government introduced new national housing technical standards in England. Mandatory minimum space standards are already required through Building Control Regulations Part L; however the 2015 standards introduced a nationally described space standard for floorspace above these that authorities can implement through the Local Plan. Authorities should provide justification for requiring internal space policies including evidence on the need for a policy. The impact of requiring these standards on viability must also be assessed as part of the Local Plan viability assessment.

Local Policy

7.59 The adopted Core Strategy (Appendix 6) includes local internal space requirements although the national policy changes set out above means we can no longer ask for these. However as we have these existing standards, we are currently able to ask for the nearest national

equivalent- the nationally described space standard - March 2015. A priority of the Council’s Housing and Homelessness Strategy 2018-2022 is to improve the standard and quality of housing to positively contribute to the health wellbeing and independence of residents. Part of this is future proofing new homes to prevent housing related health issues.

Policy Options

Table 22: Internal space policy options

<p>Option A: Rely on the mandatory space standards required through the Building Control Regulations Part L.</p>
<p>If the Local Plan stays silent on internal space standards then the requirement for new development would be to meet the mandatory space standards required through the Building Control Regulations Part L. These requirements are below that of the new optional National Internal Space Standards.</p>
<p>Option B: Adopt the Optional National Space Standards in part.</p>
<p>This could include adopting standards for certain sizes or tenures of property. The impact of these standards on viability will need to be assessed through the Local Plan viability assessment.</p>
<p>Option C: Adopt the Optional National Space Standards.</p>
<p>This option would see the Local Plan reflect the national space standards where it can be demonstrated that there is a need for these standards. This would see higher internal space standards than if the Local Plan stays silent on this matter. The impact of these standards on viability will need to be assessed through the Local Plan viability assessment.</p>

Question 45:

Which of the above option(s) do you think should be pursued? Are there any other options/design measures to consider?

Health and wellbeing

Key Issues

7.60 To ensure residents have adequate access to health services and facilities.

- As the population of the district is living longer it is important that each community has access to a sufficient range of facilities and services including primary care services, health centres and GP surgeries. Dependent on the growth strategy that is pursued, there may be a requirement to provide new health facilities.

7.61 To ensure that new development contributes to the health and wellbeing of residents.

- South Staffordshire has a rapidly ageing population. It is estimated to have one of the largest increases nationally with the number of residents aged 65 and over increasing by 65% by 2035. With residents living longer this has implications in terms of a dramatic rise in age related illnesses and ailments. While conditions such as dementia and physical incapacity are key issues in this regard, there are also issues that apply to the

general population such as obesity. Indeed, 70% of residents in South Staffordshire are regarded as being overweight or obese which is above the national average. The issue of mental health is also important with 7.4% of residents suffering from some form of depression. Improvements to health and wellbeing can often be achieved through relatively simple improvements to the design and layout of housing developments, and this is reflected in the Design and Residential Amenity section (p. 66)

Existing Policy

National Policy

7.62 National policy explains that the planning system can play an important role in facilitating social interaction, creating safe and accessible communities and enabling healthy lifestyles. It confirms that this can be done by providing mixed use developments, and street layouts that allow for multiple connections between neighbourhoods, legible pedestrian routes, green infrastructure and facilities that encourage healthy lifestyles.

7.63 Planning Practice Guidance also confirms that LPAs should ensure that health and wellbeing, and health infrastructure are considered in plan making. Plans should help to promote active travel, physical activity, access to healthier food and high quality green infrastructure that are accessible to the whole community.

0.9% of residents have
Dementia
against a national
average of 0.8%



Local Policy

7.64 Policy CP14 of the adopted Core Strategy aims to promote, enhance and provide a network of open space, sport and recreation facilities to encourage active participation by all members of the community, including adults and older people. This is achieved through Policy HWB1 which aims to protect existing open space, sports and recreation facilities. Policy HWB2 on Green Infrastructure also supports the protection, maintenance, and enhancement of green infrastructure in South Staffordshire which itself contributes to the health agenda.

7.65 Core Policy 4: Promoting High Quality Design confirms that development proposals should produce a healthy environment but this is not elaborated on further. Policy EQ11 contains many of the features that may contribute to the health agenda, such as the provision of safe footpaths and cycle paths, but does not reference these within the context of health.



Policy Options

Table 23: Health and wellbeing policy options

<p>Option A: Continue with existing positive policy approach of promoting measures that contribute to health and wellbeing through varying policy themes (e.g. design, green infrastructure).</p>
<p>The adopted Core Strategy largely focuses on the provision of open space, green infrastructure and recreational facilities for addressing the health agenda; however does this via different policy areas i.e design, landscaping, land use etc. As such, there is currently limited scope for encouraging</p>

specific interventions in a holistic way.

The positive impact that open space has on wellbeing is not simply down to open space being allocated but the specific type of open space provided. For example, open space with dispersed clumps of trees and shrubbery has a far greater positive impact on wellbeing than an open field or dense overgrown woodland. However, currently our requirements would simply be for open space.

The current design policies do not address health issues specifically and there are many small but important interventions that would be missed under the current approach that would help people with dementia, such as the type of colours used, the shape of paths, landmarks etc.

Option B:

To adopt specific policy requirements on health in the new Local Plan that addresses the health needs identified, including how these are expected to be met through the design, landscaping, and master planning of development with guidance on this matters provided through a Healthy Communities Supplementary Planning Document.

Having a holistic policy on health and wellbeing would allow the Council to tackle the future health issues of the district directly and ensure that design, landscaping, and land use issues for future planning proposals take health and wellbeing fully into account.

A Council led approach to master planning of strategic sites (e.g. 150+ units) could help ensure that the Council's health and wellbeing objectives are reflected in new developments from scheme design stage. This option could include a requirement for a Health Impact Assessment for certain sites at the planning application stage. It is considered that this approach would support the Council's commitment to the Health in All Policies agenda.

Question 46:

Which of the above option(s) do you think should be pursued? Are there any other options/design measures to consider?

Leisure facilities

Key Issues

7.66 Ensuring good quality sports and leisure facilities are accessible to local residents.

- It is essential that the Local Plan considers access to existing sports and leisure facilities, the quality of existing facilities, and whether new provision is needed. A new Sports Facilities and Playing Pitch Audit will be a key part of the evidence base to inform policy choices. This will need to consider if new development could put pressure on existing facilities, and whether new facilities should be provided if the Council seeks to allocate new settlements or large urban extensions.

Existing Policy

National Policy

- 7.67 National Policy confirms that planning policies should support an appropriate mix of uses including sports and leisure facilities to enable and support healthy lifestyles. Planning

policies should be based on a robust and up to date assessment of facilities and used to determine what provision is needed. Existing sports and leisure buildings or land should not be built on unless specific criteria set out in the NPPF have been met.

Local Policy

- 7.68 The Core Strategy includes Core Policy 14 that supports improvements to the quantity, quality and accessibility of outdoor and indoor leisure, sport and recreation. Policy HWB1 seeks to protect the loss of open space, sport and recreation unless specific criteria outlined in the policy can be met.

Policy Options

Table 24: Leisure facilities policy options

<p>Option A: Continue with the current policy approach of expecting a contribution towards the provision and/or improvement, of open space, sport and recreation facilities.</p>
<p>This reflects Core Strategy Core Policy 14 and is a fairly broad requirement. In practice, this approach has seen new developments focus on providing open space provision in line with the Council’s open space standards set out in Policy SAD 7 of the Site Allocations Document.</p>
<p>Option B: In addition to maintaining the Council’s Open Space Standards, introduce new standards for sports and leisure facilities.</p>
<p>This would see additional standards introduced relating to sports and leisure facilities to be informed by a new Sports and Playing Pitch Audit and Strategy. This would provide greater clarity on what our expectations are for contributions towards sports and leisure improvements/provision.</p>

Question 47:

Are there any areas of the district where the quality and/or quantity of sport and leisure provision are lacking? If so, please provide details, and do you have evidence to support this?

Education

Key Issues

- 7.69 **Staffordshire County Council has a statutory duty to ensure that sufficient primary education and secondary education is available to meet the needs of the population.**
- New housing developments often place pressure on existing services including education. The School Organisation Team acts on behalf of the Local Authority to ensure there are sufficient school places across the district. Education contributions will be sought for the additional school places required to mitigate the impact of the developments. This could be in the form of enhancement to existing schools or new facilities. Currently schools in South Staffordshire are specifically operating at capacity for business purposes.

7.70 Supporting the national objective of securing a diversity of education provision.

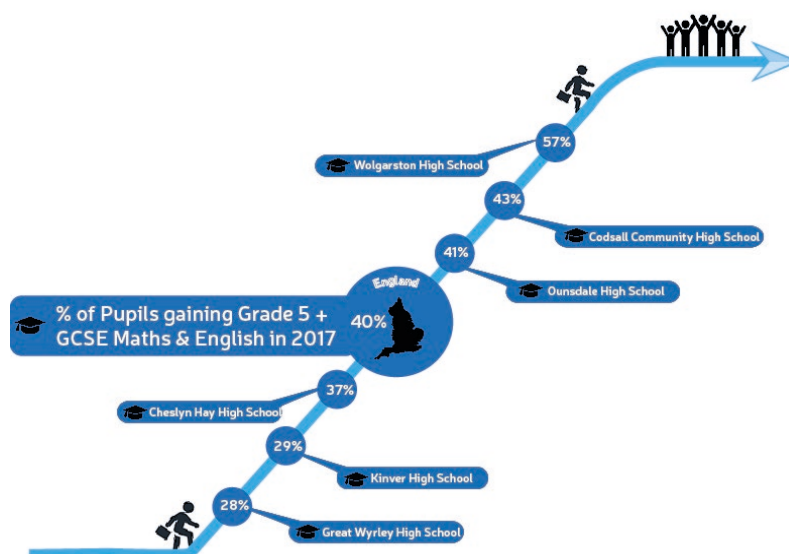
- The Government is seeking to promote diversity in the range of education provision with an increased emphasis on the role of non-traditional providers including academies and free schools. The local plan could potentially have an important role in supporting this diversification by promoting suitable sites and facilitating non-traditional providers to become established.

7.71 A need for a new primary school in Bilbrook or Codsall has been identified in the SAD to come forward in conjunction with the safeguarded land through the Local Plan review.

- An analysis of the potential to expand schools on existing sites was undertaken in July 2015. This has confirmed that there is limited capacity for schools to expand in the Codsall (First and Primary) Schools planning area. It confirmed that the safeguarded land coming forward in these villages will trigger the need for a new primary school to come forward on one of the safeguarded land sites. It is proposed that existing safeguarded land is allocated through the Local Plan review.

7.72 Re-examine existing education capacity and consider the need for new schools to serve new developments.

- In 2015 Staffordshire County Council’s School Organisation Team undertook an analysis of school capacity for each school place planning area considering both known future development in these areas and the potential for each school to physically expand. This analysis will need to be revisited for the new Local Plan.
- Dependent on the preferred spatial strategy, there may be a need to plan for developments that would require new schools to be incorporated into the development. Typically, developments of 750+ homes would require a new primary school, whereas developments of 5000+ homes would need to be served by a new secondary school.



Existing Policy

National Policy

- 7.73 National policy requires local authorities to take a proactive, positive and collaborative approach to ensuring there is sufficient choice of school places available to meet the needs of existing and new communities in their area. Local Planning Authorities are directed to give great weight to the need to create, expand or alter schools.

Local Policy

- 7.74 The Council's current adopted Core Strategy includes Policy EQ13: Development Contributions which confirms that development contributions will be sought towards extensions of educational facilities or the construction of a new school where demand is generated by new development. Policy SAD9 of the SAD also makes provision for allocation sites to provide a financial contribution towards education. The Core Strategy also includes Policy EV4 that guides development proposals at South Staffordshire College (Rodbaston), the only higher education facility in the district.

Question 48:

Where it can be demonstrated that new residential development necessitates a new school, should the school be delivered on site alongside the residential development? Should there be a threshold where sites can be realistically be expected to deliver a school? E.g only on strategic allocations (e.g. 150+ homes)

Question 49:

Is there a need to carry forward a specific policy to guide development at South Staffordshire College (Rodbaston) through to the Local Plan review?

Children's play and youth development

Key Issues

- 7.75 **Consider if there are existing shortfalls in play space provision and secure enhancements to meet the needs generated by new development.**
- The 2017 Open Space Strategy identified a number of deficiencies in respect of the spread and provision of children's and young adults play facilities. Four formal types of young person space provision are identified in the strategy: LEAPs (local equipped areas for play); NEAPs (neighbourhood equipped areas for play); MUGAs (Multi Use Games Areas) and skate parks. It was concluded in the strategy that the sites were distributed across the district with no set pattern or strategic planning but rather on an opportunistic basis. It was identified that settlement wide provision was low in Cheslyn Hay/Saredon, Codsall and Wombourne. New development offers the opportunity to start to address such shortfalls and to enhance the level of existing provision where this is justified.

7.76 Promoting safe routes to access, and secure locations for, play.

- The opportunity to create new safe routes and potentially improve existing access should be a priority when detailed scheme proposals are being formulated. Travel distances and routes to facilities need to be preferably traffic free and in near immediate vicinity of the areas of demand – indicative catchment for play areas is currently defined as 740m. They need to be within a safe and secure location which promotes natural surveillance and deters anti-social behaviour. Consideration of traffic calming and street design has the potential to assist in promoting safe streets to accommodate children’s play through good quality design.

7.77 Promote the connection between natural environments and children and young people to encourage ‘nature play’.

- It is recognised that contact with nature can play an important role in educational and social development. Natural England is actively promoting the health and educational benefits which are to be derived from access to play and learning opportunities in the natural environment. The provision of new open spaces and the enhancement of existing resources offer the opportunity to integrate natural and semi-natural spaces into development schemes through good quality design.

Existing Policy

National Policy

- 7.78 The NPPF recognises that access to high quality green infrastructure and opportunities for play, sport and recreation can make an important contribution to the health and wellbeing of communities. Local authorities should undertake an open spaces study considering the supply of and demand for all kinds of open spaces (including children’s play) in order to understand what provision is required.

Local Policy

- 7.79 A key strategic objective of the adopted Core Strategy is to support the needs of children and young people ensuring that there is provision for play, leisure, sport, recreation and learning opportunities. Policy EQ13 identifies a requirement for developer contributions to support the provision of children’s services and facilities where there is insufficient capacity to meet the anticipated need deriving from new development. The Core Strategy supports the improvements of services and facilities for children and young adults, seeking the creation of new facilities where a need has been identified (CP15). The requirements for equipped play areas and MUGA/skate park provision is identified in the Site Allocations Document (SAD) with a requirement that on-site provision should be included within all schemes of 29 dwellings or more.

Policy Options

Table 25: Children’s play and youth development policy options

<p>Option A: Continuation of the present approach of ensuring that new developments over a certain threshold provide facilities.</p>
<p>This approach would continue the present policy of seeking to negotiate developer contributions to support the enhancement of facilities necessitated by new development. This approach is considered to be valid though it may not directly address any known or emerging issues where a more specific requirement is identified.</p>
<p>Option B: A targeted approach to providing facilities in locations where there is an existing shortfall, as well as ensuring new developments over a certain threshold provide new facilities informed by an updated Open Space Audit.</p>
<p>This option would allow us to revisit our requirements for children’s play and youth development facilities based upon revised up to date evidence. This would enable us to target the areas where there is the greatest need for new (or improvements to existing) facilities. This could be enhanced by encouraging opportunities for greater levels of interaction with the natural environment; safer streets initiatives and increased opportunities to learn through play.</p>
<p>Option C: Allocate specific parcels within strategic sites (e.g. 150+ units) for children’s play facilities.</p>
<p>This could include the master planning of sites to incorporate play and youth development facilities, enabling a design and layout that ensures that these are located in safe locations accessible via safe routes.</p>
<p>Option D: If the Council chooses to implement a Community Infrastructure Levy (CIL), use monies from this towards improving and providing children’s play facilities.</p>
<p>This would allow for a targeted approach that identifies the area where new, or improvements to existing facilities, are most needed.</p>

Question 50:

Which of the above option(s) do you think should be pursued? Are there any other options to consider?

Community Safety

Key Issues

7.80 Reducing crime and the fear of crime.

- Crime and disorder levels in South Staffordshire remain relatively low though perceptions of crime levels and the fear of crime are an issue. The reduction of crime and anti-social behaviour, people’s fear of crime and improving public confidence are key issues. Designing out crime has been a long standing feature of the planning system and is reflected in existing policy frameworks.

7.81 **Safe routes to school and Community Services.**

- The safe routes to schools initiative is aimed at decreasing traffic and pollution and increase the health of children and the community. Schemes are in place in Penkridge, Wombourne, Codsall and Perton. New developments, particularly larger scale proposals may include the creation of new streets. It is important that development proposals should promote accessible, attractive and safe local routes to key services such as schools.

Existing Policy

National Policy

- 7.82 National policy directs planning policies to aim at the creation of healthy, safe and inclusive communities. Development should be designed to be safe, inclusive and accessible and which can assist in countering crime and the fear of crime.

Local Policy

- 7.83 The adopted Core Strategy highlights the need to promote safety of the local population in their homes and also within the wider community. Policy CP13 promotes the use of design solutions to promote safer living environments. This will include increasing the opportunities for natural surveillance and ensuring liaison with the appropriate authorities during the process of scheme design (Policy CS1). Improving road safety and providing safe and secure walking and cycling connections are identified as key considerations which contribute towards the promotion of Sustainable Transport (CP11).

Question 51:

Is there a need to carry forward Core Policy 13 and Policy CS1 to the new Local Plan or should we defer to national policy when considering community safety issues through planning applications?

8. Economic Vibrancy

Employment sites

Key Issues

8.1 Ensuring we retain existing employment sites/land where the evidence suggests it should be retained.

- It is important that the Local Plan protects against the loss of employment sites/land to other uses where these sites are currently providing employment, or where the evidence suggests they should be retained. This is critical to ensure that there is a good mix of housing and employment in our settlements, ensuring residents have sustainable access to jobs, and that good quality employment sites are not lost unnecessarily.

8.2 Ensuring that the pattern of new employment development supports the needs of businesses and gives residents good access to the local jobs market.

- It is essential that new employment land is located in areas that are attractive to the market, with good access to the strategic road network, the workforce and the wider supply chain often key considerations for businesses. However, it is also important that our residents can access employment opportunities via sustainable means. The strategic distribution of new employment land is considered in Chapter 4 (page 33).

8.3 Ensuring that where new employment sites are allocated that the correct type/use class of employment is delivered.

- It is important that new employment land delivers a mix of use classes, specifically B1 office, research and design and light industrial uses; B2 Industrial and B8 logistics and distribution uses. It is important that new employment allocations strike the correct balance between these uses informed by the evidence. Clearly, the optimum location for a large scale distribution centre may differ from a small scale manufacturing operation and therefore it is essential that the correct types of employment are allocated in the most appropriate locations.

Existing Policy

National Policy

- 8.4 National policy requires that we set out a clear economic vision and strategy for the area that encourages sustainable economic growth. It then requires us to set criteria or identify sites that will provide inward investment to deliver the strategy. It is important that adequate infrastructure is provided to enable and support new employment growth. The strategy should be flexible enough to accommodate changes in economic circumstances.

Local Policy

- 8.5 The approach in our adopted Core Strategy allows for ‘modest extensions’ to our Four Freestanding Employment sites at I54 South Staffordshire, ROF Featherstone, Hilton Cross and Four Ashes where supported by robust evidence. The Site Allocations Document (SAD) subsequently allocated extensions to i54 South Staffordshire and ROF Featherstone further directing sustainable economic growth to the M54 corridor. The Core Strategy (Policy EV1) seeks to protect the loss of employment land unless specific criteria (including appropriate marketing) have been met.

Policy Options

Table 26: Employment sites policy options

<p>Option A: Continue with criteria based policy to safeguard existing employment sites, including existing employment in villages, plus allocate new sites to meet evidenced future need</p>
<p>This option would seek to retain employment sites in villages which will enable sustainable access to employment opportunities for residents of those villages and would see a mix of uses in those villages. However, village locations for employment sites may not be the best locations from a business perspective.</p>
<p>Option B: Don’t safeguard existing employment sites and compensate for the potential loss of employment in villages with new allocations to compensate for this loss (additional to allocations to meet evidenced future need).</p>
<p>This approach could see the reduction in employment sites in village centres for other suitable village uses such as housing. This could result in a need to allocate more employment land to compensate for this loss. This could focus on locating new employment land at better locations from a business perspective (e.g. in close proximity to the strategic road network).</p>

Question 52:

Should we allocate new sites for specific employment use classes? What should the breakdown between the B1, B2 and B8 class uses be? Please provide evidence to support your response.

Question 53:

If we continue with a criteria based policy that safeguards employment land for that use unless specific criteria can be met, are the criteria in the existing Core Strategy Policy_EV1 still appropriate or should they be revised?

Question 54:

Should we be looking to allocate office (B1a) use given their status as a town centre use and the lack of main towns in the district?

Question 55:

Should the current approach of relying on neighbouring urban town and cities to meet our higher order office needs continue?

Inclusive growth

Key Issues

8.6 Ensure that local people get the right education, skills and inspiration to enable them to access local jobs that are created through economic growth in the district.

- It is equally as important for local businesses to have access to a strong and skilled workforce as it is local residents having access to good job opportunities to enable them to prosper. There are options for the Local Plan to include requirements for new employment generating developments to train and utilise the local workforce during the construction phase of the scheme and ensuring that local people are employed by the business itself. This will improve the skills and access to jobs for people in the district.
- The construction sector can potentially provide a large number of entry level training positions and formal apprenticeships aimed predominantly at young people. This would help young people enter the labour market and help address youth employment issues.

Existing Policy

National Policy

- 8.7 National policy confirms that planning policies should create the conditions where businesses can invest, expand and adapt. Having access to a skilled workforce is a key part of creating these conditions and a strong local economy.

Local Policy

- 8.8 The Core Strategy seeks to ensure that local people enjoy access to jobs and includes policies to encourage opportunities for inward investment and economic development. The current Core Strategy does not have a specific policy that requires an Employment & Skills Plan to be produced and implemented. However, a number of the Council's corporate documents, such as the Council Plan and Efficiency and Income Plan do identify enhancing the skills of residents as a key priority.

Policy Options

Table 27: Inclusive growth policy options

<p>Option A: Require applicants to submit an Employment and Skills Plan (ESP) for developments of 10 or more residential units or 1000sqm of commercial floorspace, with the delivery of the Employment and Skills Plan secured through a Section 106 agreement or via a planning condition where it is considered appropriate to do so.</p>
<p>This would require an ESP on all major applications and should include measures agreed with the Council's Enterprise and Building Better Opportunities teams. These could include the provision of local apprenticeships, sector based work academies, work trials, interview guarantees, work placements, formal links with local schools and recruitment through local employment agencies and work clubs. This approach would likely see SME developers required to provide an ESP, but could prove overly burdensome for some small developers.</p>

Option B:

Require applicants to submit an Employment and Skills Plan (ESP) for developments of 20 or more residential units or 1000sqm of commercial floorspace, with the delivery of the Employment and Skills Plan secured through a Section 106 agreement or via a planning condition where it is considered appropriate to do so.

This option involves the same requirements for an ESP as Option A above, however with a higher threshold for providing an ESP that may be less burdensome on small developers.

Option C:

Require applicants to submit an Employment and Skills Plan (ESP) for developments of 100 or more residential units or 5000sqm of commercial floorspace, with the delivery of the Employment and Skills Plan secured through a Section 106 agreement or via a planning condition where it is considered appropriate to do so.

This option involves the same requirements for an ESP as Option A above, however is set at a threshold that generally will only require major housebuilders and large employment developers to produce and implement an ESP.

Question 56:

Which of the above option(s) do you think should be pursued? Are there any other options to consider, for example setting a different threshold for the scale of development where an ESP will be required?

Question 57:

Are there any other measures, besides requiring an Employment and Skills Plan that the Local Plan should consider that will improve the skills and access to jobs for people in the district?

Question 58:

Should we produce an Inclusive Growth SPD to provide guidance on the process of agreeing an ESP and what could be included in it?



79% of all Businesses

Rural employment and tourism

Key Issues

8.9 Effectiveness of the present policy approach to rural employment.

- There is a key aspiration to provide locally based jobs to reduce out-commuting. The employment strategy is aligned with the settlement hierarchy however there is support for growth in areas outside settlement development boundaries principally to support agricultural diversification and through the reuse of redundant rural buildings. Though anecdotal, the indications are that the majority of redundant buildings have been redeveloped for residential uses (often as barn conversions) in spite of the clear policy preference for economic development on such sites. This situation has potentially been compounded by recent changes to the Permitted Development (PD) regime.

8.10 Promote policies which support the growth of the tourism sector.

- Tourism is one of the key economic sectors identified as having significant potential for growth within the district. The sector has the potential to create locally based employment opportunities and increase local income generation. There is a range of possible tourism opportunities within the district including the attraction of the network of villages and surrounding countryside and the potential for active outdoor pursuits and visits associated with the numerous historic estates.

8.11 Potential conflicts between existing Core Strategy policies seeking to restrict development (e.g. Policy GB1 and OC1) and those seeking to promote small scale rural employment opportunities as a means of supporting sustainable patterns of growth.

- The current Local Plan strategy, whilst offering a clear preference for locations within existing settlements, acknowledges that tourism development and proposals which support the local rural economy and rural diversification are likely to occur outside of the district's villages. Such opportunities beyond the reuse of existing buildings (see above) would appear to be restricted by existing policy restrictions in Green Belt and Open Countryside areas.

8.12 High levels of car dependency; poor levels of public transport provision to rural employment opportunities.

- Isolation from employment opportunities and services is a potential issue for members of the community without ready access to private transportation options.

Existing Policy

National Policy

- 8.13 Securing economic growth is identified by the NPPF as one of the principle objectives of the planning system. National policy recognises that sites to meet local business and community needs may be situated outside of existing settlements in locations not well served by public transport. In rural areas the NPPF promotes the sustainable growth and expansion of all businesses through the conversion of existing buildings and the development of new

buildings. Whilst it is considered that all types of business should be encouraged, specific reference is made to the role of agricultural diversification and the tourism and leisure sectors.

Local Policy

- 8.14 One of the key strategic objectives identified in the Core Strategy is to support the growth of a vibrant, prosperous and sustainable local economy, providing locally based jobs and reduce levels of out commuting. Outside the service villages, employment development is primarily focussed on the opportunities offered by the re-use of redundant rural buildings. The policies promoting rural diversification (CP9) and rural employment (EV5) offer a series of conditions including the requirements for a business case to be produced that need to be satisfied in order to justify rural enterprises in areas outside of settlement boundaries. Tourism is identified as one of the key economic sectors strongly featured (Policy EV2) though there is a clear preference for new facilities to be located within existing settlements. Any proposals outside of settlement boundaries need to be accompanied by a business case. It is not indicated what should be the elements of such a case or any guidance on how it might be assessed.

Policy Options

Table 28: Rural employment and tourism policy options

<p>Option A: Continue with existing positive policy approach of supporting rural diversification with a preference for development within existing development boundaries. Development outside existing villages to be primarily restricted to opportunities related to reusing existing buildings.</p>
<p>This would provide a measure of consistency however it is questionable the degree to which it can be considered to have been effective in promoting and sustaining rural employment opportunities. This existing approach could however be strengthened by providing additional clarity on what will be required in terms of marketing prior to redundant rural buildings being released for residential development; as well as providing a clear steer on what would be required from a business case for new business developments in locations outside of existing development boundaries. Where proposals do not form one of the acceptable forms of development in the Green Belt, it would be for the case officer to determine if the business case along with other material considerations amount to the Very Special Circumstances to justify the proposal. The policy could clarify the types of uses which may be more suited to a village centre location and those which could be restricted in the more isolated rural employment locations</p>
<p>Option B: In addition to strengthening the support for employment and tourism uses in redundant rural buildings, explore the potential that limited scale new buildings (in the form of limited infilling) to support employment/tourism development might be promoted in rural areas outside of existing centres where this is acceptable in sustainability terms and can be justified by a robust business case.</p>
<p>This would be a clear positive statement of intent that encouraging rural employment opportunities and tourism facilities has a high priority. Proposals would need to be considered in terms of their compliance with Green Belt, Open Countryside and general sustainability considerations.</p> <p>There are risks however, particularly the potential for such new build schemes to act as a stepping stone for residential development in the Green Belt/Open Countryside. Again, this approach could be supported by clarity on what will be required in terms of marketing of redundant rural buildings</p>

and details of what should be included in any business case. The policy could clarify the types of uses which may be more suited to a village centre location and those which could be restricted in the more isolated rural employment locations

Question 59:

Which of the above option(s) do you think should be pursued? Are there any other options to consider?

Village centres and retail

Key Issues

8.15 Should we retain our existing village and neighbourhood centres?

- The policies maps for the SAD define the village and neighbourhood centres identified in Policy CP8 of the adopted Core Strategy. Through the new Local Plan it will be important to consider if these areas are still correct and if any of the centres should (or could) be expanded or reduced in size, informed by a retail study.

8.16 Understanding the quality of the existing retail offer and the need for additional retail floorspace.

- Whilst the existing village centres offer a more localised range of services, the pressure on established forms of retail is increasing with an increased level of expenditure occurring online. In addition, there is a trend towards the concentration of high order and mixed retail, leisure and recreational services occurring in fewer but larger regional centres.
- However, it is likely that the district will be required to accommodate significantly greater levels of development than has been the case in recent years, which could see the need for additional retail floorspace.

Existing Policy

National Policy

- 8.17 National policy has a commitment to promoting the vitality of town centres. In addition to the approach of promoting the growth and management of centres, the requirement to support adaptation has recently been introduced. This shift in promoting adaptation is reflected in a commitment to ensuring long term vitality and viability through growth and change including the introduction of housing. The NPPF includes the requirement for a sequential approach to locating main town centre uses and for an impact assessment when assessing retail and leisure proposals outside town centres.

Local Policy

- 8.18 The Core Strategy establishes a clear hierarchy of village centres based with the most sustainable settlements identified as Main Service Villages to act as the main focus for future

growth including retail and service provision. This approach is supported in the main retail policy within the plan (CP8) with an emphasis on retaining A1 uses in the village centres whilst encouraging diversification, except where this would result in a concentration of non-retail uses. A review of the settlement hierarchy in the new Local Plan could see amendments to the hierarchy of village centres.

Policy Options

Table 29: Village centres and retail policy options

<p>Option A: Continue with existing policy approach of identifying and protecting the local centres with an emphasis on these meeting basic day to day needs. Continue to rely on larger centres outside the district to meet higher order needs.</p>
<p>This would involve a new assessment of retail, services and facilities within the existing centres and the potential roles which they can play.</p>
<p>Option B: Continue to protect the local centres with an emphasis on these meeting basic day to day needs; however also allocate new higher order retail in one or more of the most sustainable villages</p>
<p>It is considered likely that significant levels of development will be required during the next plan period. This affords the opportunity to identify one or more centres potentially for expansion to accommodate this additional demand and to expand into the role of principal settlement(s) within the district with higher order retail and service provision.</p>
<p>Option C: Allocate specific areas within strategic sites (e.g. 150+ units) for retail, where new services and facilities are being provided.</p>
<p>This approach could see the opportunity to masterplan new retail within larger sites to serve the residents.</p>

Question 60:

Which of the above option(s) do you think should be pursued? Are there any other options to consider?

Protecting community services and facilities

Key Issues

8.19 Protecting existing community facilities.

- Many valued local community facilities are under pressure, particularly in the smaller villages and settlements where such provision is limited in scale. Public houses, shops and post offices are under pressure, often by conversion into residential properties. Policy measures already exist to protect such services though viability is a key concern. It is often the case that once a business closes it is a matter of time before the service is lost. In addition to seeking to protect such facilities, a flexible approach towards to co-location of facilities on a single site may be considered.

8.20 Providing clarity on when a community facility should be retained, in particular around the definition of the last remaining service or facility.

- There is at present a lack of clarity as to what would constitute the last remaining facility in certain locations. Geographically should this definition be restricted to facilities located within the boundaries of each settlement, or in line with the approach identified in the NPPF (para 55), should a broader approach be adopted which considers the provision of facilities within a cluster of villages.

Existing Policy

National Policy

- 8.21 The main principles of promoting the creation of healthy, inclusive and safe communities have remained consistent in national policy. A key objective is to promote social interaction with an emphasis on creating integrated developments, shared spaces, active streets and promoting the provision of community facilities. In addition to planning positively for the provision of new services and facilities, national policy also promotes planning policies which will protect against the loss of existing community facilities.

Local Policy

- 8.22 The Core Strategy policy CP1 establishes a clear commitment to supporting the sustainability, cohesion and community wellbeing of the district's existing communities and settlements. The desire to retain existing facilities and services is made explicit in policies CP10 and EV9 where particular attention is given to retaining the sole or last remaining facility. A number of requirements are identified in policy EV9 which need to be satisfied when determining planning applications which could result in the loss of essential services or facilities.

Policy Options

Table 30: Protecting community services and facilities

<p>Option A: Continue with existing policy approach of seeking to protect against the loss of the sole or last remaining service or facility in a settlement.</p>
<p>This would retain the present approach of supporting the provision of new services and facilities and seeking to protect against the loss of existing services particularly where these are the sole or last remaining facility. There is the potential for this policy to be combined with policies relating to the provision of green spaces, sports provision and recreational opportunities.</p>
<p>Option B: A less restrictive approach where service provision is protected over a broader geographical area, rather than being restricted to each individual settlement.</p>
<p>This approach is more aligned to national policy where the local service provision is considered over a broader geographical area. This would retain the present approach of supporting the provision of new services and facilities and seeking to protect against the loss of existing services particularly where these are the sole or last remaining facility, although adopting a more considered approach where service provision is available in reasonable proximity within neighbouring settlements or areas.</p>

Question 61:

Which of the above option(s) do you think should be pursued? Are there any other options to consider?

Wolverhampton Halfpenny Green Airport

Key Issues

8.23 To support the effective operation of Wolverhampton Halfpenny Green Airport for general aviation.

- The airport is in the Green Belt in a relatively remote location surrounded by narrow country lanes, thereby currently limiting its scope for expansion. However, considering how planning policies can support the airport in continuing to run as a commercially viable operation for general aviation needs to be reassessed through the Local Plan review.

Existing Policy

National Policy

8.24 National policy directs planning policies towards recognising the importance of maintaining a national network of general aviation facilities – taking into account their economic value in serving business, leisure, training and emergency service needs, and the Government’s General Aviation Strategy.

Local Policy

8.25 Core Policy 12 of the adopted Core Strategy supports Wolverhampton Halfpenny Green Airport’s continued operation as a general aviation airport providing facilities and services for business aviation, private recreational flying and for flying training. The Council will also support the continued occupation of the site by existing non-aviation businesses (that play an important role in ensuring its viability) within the developed area of the site defined by the current policies map. The policy is clear that any physical or operational expansion (such as the operation of commercial passenger services) of the airport would not be supported. The Core Strategy encourages the airport owners to produce a masterplan setting out their long term vision and plans for the airport.

Policy Options

Table 31: Wolverhampton Halfpenny Green Airport

Option A:

Maintain existing policy approach of supporting development proposals relating to the general aviation role of the airport (along with the continued occupation of the site for existing non-aviation businesses) only within the developed area of the site as defined by the current policies map. Continue to encourage the owners to produce a masterplan setting out their long term

vision for the airport.

This suggested approach a continuation of the measures which are already in place and very much limits new development to that which directly supports the principal general aviation function of the site.

Option B:

Remove the boundary of the developed area as defined on the current policies map, which is currently the focus of support for development proposals relating to general aviation, and rely on Green Belt policy. Continue to encourage the owners to produce a masterplan setting out the long term vision for the airport.

This approach would see a reliance principally on Green Belt and rural diversification policies for judging the acceptability of proposals at the airport.

Question 62:

Which of the above option(s) do you think should be pursued? Are there any other options to consider?

Infrastructure

Key Issues

8.26 A need to explore opportunities for new development to come forward that will help deliver new infrastructure to address existing deficiencies.

- It essential that that the Local Plan includes strategic priorities and policies to deliver new infrastructure where evidence has been provided that demonstrates that existing provision is insufficient. Evidence to support decisions should not be anecdotal, but needs to be technical evidence that considered the needs for infrastructure objectively.

8.27 A need to provide sufficient, physical, social and green infrastructure to directly support new development coming through the Local Plan.

- Infrastructure will be required on site allocations where it can be demonstrated that it is needed to make the development acceptable in planning terms. Some allocations will not be acceptable without certain on-site infrastructure; for example SUEs in excess of 1000 homes are likely to require a new local centre.

8.28 A need to ensure that mechanisms are in place for maximising new infrastructure.

- The Council currently requires new developments to contribute towards new infrastructure provision through Section 106 agreements. These agreements can provide physical infrastructure, for example highway improvements and open space. Community Infrastructure Levy (CIL) also provides an opportunity to deliver infrastructure including locally identified priorities.

Existing Policy

National Policy

- 8.29 National Policy confirms that Local Plans should set out the strategic priorities for an area including policies to deliver the necessary infrastructure. Plans should set out the contributions expected in association with particular sites and types of development including for infrastructure. Planning policies should support development that makes efficient use of land that takes into account the availability and capacity of infrastructure.

Local Policy

- 8.30 The Council's current approach to infrastructure delivery is set out in Core Policy 5. The Core Strategy also includes Policy EQ13 setting out circumstances where development contributions will be sought.

Policy Options

Table 32: Infrastructure policy options

Option A: Continue with the current approach of using Section 106 payments to fund all of the types of infrastructure as currently.
This would ensure that infrastructure is provided where it can be demonstrated that it is necessary to support the new development, including education provision, open space, play provision, highways and other infrastructure specific to the development. Often infrastructure secured through Section 106 agreements are delivered on site.
Option B: Explore the opportunity to implement a Community Infrastructure Levy (CIL) for the Local Plan review.
This would allow us to implement a CIL charge on all new development where it has been demonstrated that it is viable to apply a charge. Monies collected through this route could then be spent on local infrastructure priorities decided by the Council, and these projects would not need to be directly related to new development. However, there may be certain types of development that would be CIL exempt. Furthermore, the greater the number of policy requirements in the Local Plan that add to the cost for the developer, the less money there will be available through CIL.

Question 63:

Which of the above option(s) do you think should be pursued? Are there any other options to consider?

Question 64:

Should the Local Plan review carry forward Policy EQ13 of the adopted Core Strategy which outlines instances development contributions will be sought? Are there any other cases where contributions should be required?

Public transport and the highway network

Key Issues

- 8.31 **To ensure that new development is served by an attractive choice of sustainable transport modes.**
- It is essential that the Local Plan ensures that new development is served by safe access to an attractive choice of sustainable transport modes including public transport, cycle ways and footpaths to help reduce congestion, greenhouse gas emissions and promote healthier lifestyles. It may be that new development could facilitate additional public transport services that would improve links for existing as well as new residents. This is a key consideration which needs to be reflected during the process of site consideration and selection.
- 8.32 **To ensure that the strategic and local road networks can accommodate additional traffic generated by new development.**
- It is essential that we work closely with the highways team at Staffordshire County Council and Highways England to ensure that evidence on highway capacity informs decisions on the scale and location for new development. This is likely to include modelling work for key junctions close to new development, and recommend works to mitigate the impact on the highway.

Existing Policy

National Policy

- 8.33 National policy confirms that transport issues should be considered from the earliest stages of plan-making. Planning policies should be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils. Plans should promote sustainable transport modes such as walking cycling and public transport with significant developments in particular focused in locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.

Local Policy

- 8.34 The adopted Core Strategy includes a policy on sustainable community transport promoting sustainable forms of transport as an alternative to car use including public transport, cycling and walking. It acknowledges that improving rural transport and accessibility is a key issue particularly for vulnerable people without access to a car. The M54/M6/M6 Toll link road and Brinsford Strategic Park and Ride are identified as regional infrastructure projects that may be delivered in the Core Strategy plan period. Policy EV11 includes details of sustainable travel measures that may be required including the provision of Travel Plans.

Policy Options

Table 33: Public transport and highway network policy options

Option A: Require new developments to demonstrate through a Transport Statement how they will facilitate walking and cycling and the use of public transport.
This would require applicants to demonstrate how they would reduce car dependence in new developments
Option B: In addition to the requirements of Option A, seek contributions to support sustainable transport choices through Section 106 agreements.
This option would require Section 106 funding towards sustainable transport modes for example bus routes, walking and cycling paths where it can be demonstrated that these are related to the new development.

Question 65:

Which of the above option(s) do you think should be pursued? Are there any other options to consider?

Question 66:

Are there any areas where highway capacity is a concern where

- a) Development should be restricted; or**
- b) Where new development could facilitate road infrastructure improvements**

Question 67:

Should the Local Plan include a policy that requires development to incorporate electric charging points? Should there be a threshold for the number of new dwellings on a new development where this would be required?

Electronic communications

Key Issues

8.35 To ensure that high quality and reliable broadband and electronic communications infrastructure is in place to support existing residents and new development.

- Ensuring our residents and businesses have access to high speed broadband and effective communication infrastructure is important as more interactive and flexible work styles become more widespread. This enables the development of more live/work units which can enhance the range and quality of employment opportunities locally and help to reduce the need to travel, resulting in wider sustainability benefits

Existing Policy

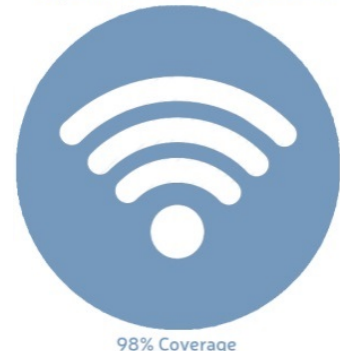
National Policy

- 8.36 National policy confirms that Local Plans should support the expansion of electronic communications networks, including 5G technology and full fibre broadband connections. Policies should set out how high quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments.
- 8.37 However, the numbers of radio and electronic communications masts and the sites for such installations should be kept to a minimum consistent with the efficient operation of the network. Local authorities should not impose blanket bans on electronic communications development or insist on minimum distances between new electronic communications development and existing development. New equipment should be sympathetically designed and camouflaged as appropriate.

Local Policy

- 8.38 The existing Core Strategy policy covering electronic communications (Policy EV10) sets out criteria for when development will be permitted. Whilst not setting a blanket ban on infrastructure, these criteria broadly put the emphasis on the developer to demonstrate that existing infrastructure can't be utilised and that the impact on the environment from the development will be mitigated as far as possible.

Superfast Staffordshire Broadband



Question 68:

Do you support keeping our existing criteria based policy setting out the circumstances electronic communications development - in need of planning permission - will be permitted?

Question 69:

Should the new Local Plan include a policy that requires all new housing and employment developments to have a connection to fibre optic broadband?

9. Natural and Built Environment

Green Belt

Key Issues

9.1 Impact of meeting future housing requirements on existing Green Belt boundaries.

- The standardised methodology for calculating our objectively assessed housing need (OAN) prescribed by the Government has identified a need for 270 dwellings per annum for South Staffordshire, equating to 5,130 dwellings over the proposed plan period (2018-2037). Additionally a potential 60,855 dwellings of unmet need has been identified arising from within Birmingham and the Black Country Housing Market Area (HMA). The combined requirements of an increased OAN and the potential for meeting an element of the overspill requirement is likely to increase pressures for Green Belt releases, given the lack of brownfield sites within the area and the small proportion of the district that is outside the current Green Belt boundary.

9.2 Ensuring that Green Belt boundaries endure beyond the plan period.

- The existing Local Plan has made provision for 10 years' worth of safeguarded housing land. The apportionment of this safeguarded provision was broadly in line with the current spatial strategy outlined in policy CP1. The new Local Plan is likely to result in significant additional development requirements on a range of sites in terms of scale and location. Within this context it will need to be determined what approach is the most appropriate to ensure the long term integrity of Green Belt boundaries.

9.3 Encouraging positive uses of Green Belt.

- The longstanding commitment to utilise sites in the Green Belt for a mixture of positive uses has been given extra emphasis in the revised NPPF through a commitment for compensatory measures to enhance Green Belt, where releases are being promoted for development. A range of potential uses has been identified including enhanced sport and recreation, support for biodiversity and green networks, improvements in accessibility and landscape enhancements

Existing Policy

National Policy

- 9.4 Areas of Green Belt are identified in national policy as being exempt from the general presumption in favour of sustainable development, with a strong policy commitment to Green Belt remaining. Before identifying Green Belt sites the local authority should satisfy itself that all other potential non-Green Belt sources of land supply have been explored, including brownfield sites, optimising development densities and exporting requirements to neighbouring authorities. If Green Belt releases are required, first consideration should be given to previously developed land and/or sites well served by public transport. Green Belt releases should be offset by compensatory improvements to remaining Green Belt land. When

considering planning applications, other than for a limited number of exceptional uses, very special circumstances are needed to justify developments in the Green Belt.

Local Policy

- 9.5 The Core Strategy contains two principle Green Belt policies. Policy GB1 is a Development Management policy identifying the types of development which may be acceptable in Green Belt locations. The permissible uses are closely aligned to those identified in national policy. Policy GB2 relates to the approach towards safeguarded land including existing and future designations, providing a hook for the site allocation stage of the plan preparation process. Detailed amendments to Green Belt boundaries to accommodate development requirements were undertaken through the Site Allocations Document (SAD) Policy SAD6. Further guidance on the operation of certain elements of the Green Belt policy within the district is set out in the Council’s Green Belt and Open Countryside SPD.

Policy Options⁴

Table 34: Green Belt policy options

<p>Option A: Update Policy GB1 of the adopted Core Strategy setting out the list of Green Belt exceptions reflecting national policy.</p>
<p>This would ensure the Local Plan review is fully aligned with National Policy.</p>
<p>Option B: Update Policy GB1 of the adopted Core Strategy setting out the list of Green Belt exceptions reflecting national policy; also update the existing Green Belt Supplementary Planning Document (SPD) that defines the key terms and what this means for South Staffordshire.</p>
<p>This would ensure the Local Plan review is fully aligned with national policy. Additional detail could be provided in the policy or an SPD to assist decision making with respect to matters such as the permissible scale of extensions and replacement buildings, the meaning of limited infill etc.</p>

Question 70:

Which of the above option(s) do you think should be pursued? Are there any other options to consider?

Question 71:

What compensatory improvements (to offset removing land from the Green Belt) to the environmental quality and accessibility of remaining Green Belt land should be considered and how should they be implemented?

⁴ It is assumed that the NPPF (para 136) requirements for minimising Green Belt releases will be addressed as part of the overarching development strategy and will not therefore form part of the Green Belt chapter.

Open Countryside

Key Issues

9.6 To ensure that Open Countryside to the north of the district which lies beyond the West Midland Green Belt maintains its character and natural beauty.

- Parts of the Open Countryside to the north west of the district include areas of highly sensitive landscape and therefore the challenge for the Local Plan is to protect the most sensitive areas from development within the confines of what is permissible under national policy.

Existing Policy

National Policy

- 9.7 The National Planning Policy Framework (NPPF) recognises the value of non-Green Belt countryside areas, stating that policies and decisions should recognise the intrinsic character and beauty of the countryside, and the wider benefits of natural capital (such as economic benefits of agricultural land, trees and woodland). It also recognises that valued landscapes, sites of geological value and soils should be protected and enhanced in a manner proportionate to their statutory status or identified quality.
- 9.8 However, the NPPF does not explicitly state that all countryside areas should be protected for their own sake. Therefore, whilst identified valued landscapes (such as the Cannock Chase AONB or Historic Landscape Areas) continue to hold a need to be protected and enhanced, the wording of Policy OC1 needs to be reviewed to ensure it properly reflects the NPPF's aim to recognise the intrinsic character and beauty of the countryside, and the wider benefits of natural capital (e.g. the economic benefits of high quality agricultural land). The NPPF is also clear that the presumption of sustainable development does apply to the Open Countryside in the absence of a 5 year land supply.

Local Policy

- 9.9 Currently, Policy OC1 of the Core Strategy confirms that the Open Countryside beyond the Green Belt should be protected for its own sake, particularly for its landscapes, areas of ecological, historical, archaeological, agricultural and recreational value. It offers a limited set of specified circumstances in which development within the Open Countryside will be supported. This restrictive approach reflects the important role that Open Countryside has played in South Staffordshire in maintaining important strategic gaps between existing settlements in the north of the district, and preserving the landscape character and appearance of the rural area surrounding the district's settlements.

Policy Options

Table 35: Open countryside policy options

Option A:

Specify what forms of development would be supported in the Open Countryside, and identify criteria against which to assess other proposals in the Open Countryside.

This policy approach would remove reference to protecting the Open Countryside for its own sake, instead offering a more flexible policy approach to development permissible in the Open Countryside. The policy would list which forms of development would be actively supported in the Open Countryside. Criteria for proposals outside this list could be designed to protect and enhance key components of the Open Countryside, such as landscape character, ecology and natural capital considerations. It would also ensure all developments in the Open Countryside are in broad conformity with the development strategy for the district.

Option B:

In addition to Option A, undertake further landscape evidence to identify key strategic gaps/areas of restraint surrounding settlements that should be protected and enhanced.

The identification of key strategic gaps to be protected from development would offer more certainty to developers and local communities, as to which locations in the Open Countryside are of particular strategic landscape importance and therefore require higher levels of protection.

Option C:

Continue with the current policy approach of protecting the Open Countryside for its own sake, positively encouraging only those forms of development which are specified under a new Open Countryside policy.

This would offer a restrictive approach to development in the Open Countryside, limiting appropriate forms of development to those set out in Policy OC1 of the Core Strategy. Therefore, development outside of the scope of Policy OC1 would continue to be restricted throughout the Open Countryside.

Question 72:

Which of the above option(s) do you think should be pursued? Are there any other options to consider?

Landscape character

Key Issues

9.10 Impact of meeting future development requirements on landscape character.

- The need for higher levels of growth in South Staffordshire places pressure for development in previously undeveloped greenfield areas which will impact on the existing landscape character of the areas designated for development. It is recognised that some landscapes are more sensitive than others and proposals will need to be considered in relation to this local context.

9.11 Promote an evidence based approach to decision making on landscape sensitivity.

- Staffordshire County Council has produced a landscape character assessment which covers the entire county and will enable an assessment of the potential impact of development proposals on the existing character of impacted landscape. A more detailed study will be required which builds on the character study that looks at landscape sensitivity and capacity. This could incorporate other landscape scale considerations such as historic landscape character, living landscape characteristics, agricultural land quality and open space/green infrastructure considerations to arrive at a balanced assessment of sensitivity to change.

9.12 Promoting a landscape-led approach to new development proposals

- Landscape character should inform decisions on location, layout and design of new developments. High quality landscapes can offer multiple benefits and opportunities including promoting better integration with existing development, ensuring an effective transition between urban and rural areas, enabling the delivery of environmental services and promoting public health benefits. Landscape character can be at the heart of place making and evidence suggests that well designed and integrated landscape led developments can prove cost effective in attracting an uplift in returns generated. This approach can also assist in making new development proposals more acceptable to existing communities.

Existing Policy

National Policy

- 9.13 National policy recognises that policies should enhance the natural environment including protecting and enhancing valued landscapes. Policies for developments should respond to local character, including the surrounding built environment and landscape setting.

Local Policy

- 9.14 One of the strategic objectives of the Core Strategy is to protect conserve and enhance the quality of the landscape. This objective is reflected in Policy EQ4 which supports the use of landscape character analysis in association with proposals for new development. Opportunities for landscape character enhancement should be promoted where this will add character and distinctiveness to degraded landscapes. The benefit of a close relationship between landscape character assessment and historic landscape characterisation is recognised within the policy.

Policy Options

Table 36: Landscape character policy options

<p>Option A: Continuation of the current approach used in Core Strategy Policy EQ4 of setting out in broad terms how proposals will be expected to conserve and enhance the character of the landscape; along with the undertaking of a landscape sensitivity and capacity study to identify areas of high sensitivity and inform site selection.</p>
<p>This would retain the existing general approach of seeking to protect and enhance landscapes with a commitment to undertaking a landscape sensitivity and capacity assessment so that, where possible and subject to other site selection considerations, growth can be focused in those areas of lesser sensitivity.</p>
<p>Option B: A more prescriptive approach that could set out what would be expected for landscape led developments, with the potential for a greater role for master planning larger sites to achieve this. A policy could provide more detail on what would be expected for conserving and enhancing different landscape character types found in the district.</p>
<p>This would see greater input into the design of larger developments. This more prescriptive approach to considering specific landscape character areas could be expanded further through the District Design Guide and other relevant Supplementary Planning Documents (SPD).</p>

Question 73:

Which of the above option(s) do you think should be pursued? Are there any other options to consider?

Natural environment

Key Issues

9.15 Balancing the need for development against the overarching objective of ensuring no net loss of biodiversity.

- It is likely that the district will be required to accommodate significantly greater levels of development than has been the case in recent years. The NPPF has identified the objective of ensuring that there is no net loss in biodiversity arising from new development proposals.

9.16 Integrating designated nature conservation sites into a wider interconnected Green Network, planning on a landscape scale.

- The idea of the green network is to link together areas of importance for biodiversity with areas where there is a potential for increased biodiversity significance. The objective is to encourage the wildlife to move through the landscape and overcome the fragmentation of designated sites scattered but unconnected with isolated wildlife populations. The network incorporates both existing designated areas and areas identified as having potential for biodiversity value and movement. Ideally this network should be mapped to enable effective implementation of the network through the opportunities arising through development to offer biodiversity enhancement. The potential for creating linkages within the green network needs to be given due consideration through the process of decision making on development proposals. CIL funding for green infrastructure networks has a potentially positive role to play in this respect in addition to on-site delivery of biodiversity improvements.

9.17 A comprehensive, criteria based policy to guide Development Management decisions which reflects the hierarchy of international, national and local designations and which also acknowledges the role which undesignated sites could play in supporting the principle of no net loss and net gain where this is achievable.

- There is a network of identified designated sites ranging from sites of international significance such as Special Areas of Conservation, National Nature Reserves, Ancient Woodlands and Local Nature Reserves. Biodiversity is also a feature of sites outside of the identified network. Policy needs to reflect this hierarchy of designated sites, establishing a mixture of preservation and mitigation measures and seeking opportunities where development could enhance the network of designated and non-designated sites to promote a net gain in biodiversity.

Existing Policy

National Policy

- 9.18 National policy has introduced the idea of natural capital into planning policy. The idea of natural capital is an attempt to capture the economic and social benefits that are derived from the natural environment, and should be recognised and enhanced within the planning system. One of the key objectives of the planning system is now identified as providing ‘net gains’ for biodiversity, rather than the previous aim of achieving ‘no net losses with net gains where possible’. Plans should identify and map local wildlife rich habitats and wider ecological networks including designated sites, corridors and stepping stones and should look to promote the conservation, restoration and re-creation of priority habitats. Local Plans should distinguish between the hierarchy of international, national and local designated sites in the area. Site allocations should favour those sites with the least environmental or amenity value.

Local Policy

- 9.19 The Core Strategy includes an overarching strategic policy CP2 which promotes development where this will protect, conserve and enhance natural assets and requires that development proposals should be consistent with the NPPF. Support is particularly identified for initiatives which will increase the levels of biodiversity and promotes the development of green infrastructure links. A detailed policy EQ1 provides guidance on the approach to be taken when considering proposals which could impact on the hierarchy of nature conservation site designations. Support is offered to measures which will restore existing habitats or create new ones. New development proposals are encouraged to incorporate biodiversity features into the scheme design. A separate policy EQ2 addresses the specific concerns regarding the Cannock Chase SAC.

Policy Options

Table 37: Natural environment policy options

<p>Option A: Continue with current policy approach of promoting the protection and enhancement of the existing network of sites and encouragement for the development of green linkages; along with the continued protection of the hierarchy of designated sites.</p>
<p>This option would offer continuity with the previous Core Strategy which was written against the context provided by the NPPF and covers the main policy requirements of national policy. There has been no indication that the current approach needs significant amendment. Protected sites will continue to reference to the relevant legislative requirements with a general requirement for local sites to be protected and enhanced.</p>
<p>Option B: Continuing the approach to protecting the hierarchy of designated sites however with a clearer and more positive approach to the development of a green/ecological network including measures for biodiversity offsetting.</p>
<p>The green network would be clearly mapped with opportunities identified where enhancement would be sought. A potential target could be included to seek a net gain in biodiversity during the plan period. This approach would clearly address the approach promoted within the NPPF for a clear commitment to the idea of green networks linking existing and potential areas of biodiversity significance. This will promote migration of species and better adaptation to climate change.</p>

Question 74:

Which of the above option(s) do you think should be pursued? Are there any other options to consider?

Cannock Chase Area of Outstanding Natural Beauty (AONB) and Special Area of Conservation (SAC)

Key Issues

9.20 Visitor and recreation pressure on Cannock Chase AONB; and the protected heathland habitat within the AONB.

- Cannock Chase AONB is one of the smallest AONBs in the country and faces considerable pressure from recreation, given the unique and inviting landscape and the high number of homes within a short drive time to the area. Within part of the AONB is a European protected lowland heathland habitat known as a Special Area of Conservation (SAC) which is primarily designated as a Country Park with Open Access on 'Common Land'. There is an extensive network of Public Rights of Way across the site, therefore recreation pressures can't be avoided and instead need to be proactively managed to protect the environment. The AONB (and the SAC within the AONB) is a hotspot for a variety of recreation uses, including walking, dog walking, horse riding and cycling. The Cannock Chase AONB Partnership and the Cannock Chase SAC Partnership (of which South Staffordshire Council is a member) have been established to ensure the site is protected and managed, and that the impact of any further development on the area can be mitigated.

9.21 Future mitigation requirements to meet anticipated levels of future development.

- A system of using financial contributions from new residential development to facilitate mitigation measures is in place to protect Cannock Chase SAC, known as the Cannock Chase SAC Strategic Access Management Measures (SAMM), which can be found in the Cannock Chase SAC Guidance to Mitigate the Impact of New Residential Development. The current SAMM was most recently published in October 2016, and was introduced to address the anticipated impacts on the SAC arising from development identified in the last round of Local Plans. In the build up to the South Staffordshire examination on the Site Allocations Document (SAD), Natural England had signalled that these existing measures were being reviewed to determine if they are still sufficient given the scale of housing likely to come forward relatively close to the SAC. This evidence gathering is now underway, being led by the SAC Partnership. It is highly likely that given the scale of development which is being considered as part of the Local Plan review process, and the emphasis on seeking to identify sites beyond the Green Belt, that pressures on the SAC are likely to increase.

9.22 To consider if the current approach of restricting additional development within the AONB is adequate and whether a different approach may be more effective.

- Development proposals within the AONB are presently subject to special scrutiny. An input from the Development Management/AONB management team would be useful

to gauge what, if any, issues have arisen during the past five years where proposals have been submitted in the AONB.

9.23 Potential contribution which the SAC and AONB areas can make towards a more integrated and connected network of ecological resources.

- See section on Natural Environment Policy for more details.

Existing Policy

National Policy

- 9.24 The Habitats Regulations (2017) place a requirement on Competent Authorities to have a duty in exercising their functions to have regard to the impact of their decisions on designated internationally protected sites when undertaking their duties. For Local Planning Authorities this duty applies to the production of development plans and the taking of decisions on planning applications. The NPPF comments that the general presumption in favour of sustainable development does not apply where an appropriate assessment is required to meet the requirements of the Habitats or Birds directive.
- 9.25 In South Staffordshire there is one international site within South Staffordshire at Motte Meadows. This SAC is designated for its lowland hay meadows. There are also an additional seven international sites present within 20 km of the South Staffordshire district boundary, which we need to ensure that development does not adversely affect – one of which is Cannock Chase SAC.
- 9.26 The NPPF notes that great weight should be given to conserving landscape and scenic beauty in AONBs. Planning permission for major developments should be refused except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration should be given to the need for the development, cost of locating elsewhere and any detrimental impact on the environment and the extent to which this could be moderated.

Local Policy

- 9.27 Policy EQ2 prioritises the preservation of the Cannock Chase SAC from development which either directly or indirectly may have an adverse impact on the SAC's integrity. It was identified that such adverse impacts were likely as a result of increased visitor pressures arising from additional residential development within a Zone of Influence surrounding the Cannock Chase SAC. A series of mitigation measures have been identified and adopted by all those authorities adjoining the SAC and within the Zone of Influence. Funding for these measures is derived from a charge paid by the developer of each additional residential unit arising within the Zone. In South Staffordshire this figure is presently set at £232 per additional dwelling plus a one-off £100 administration charge.
- 9.28 The Core Strategy acknowledges that the highest status of protection of the landscape and scenic beauty should be afforded to sites within the AONB. The emphasis within policy EQ4 is on the conservation and enhancement of the landscape, nature conservation and recreation interests of the AONB area.

Question 75:

We believe that Core Strategy Policy EQ2 should be updated to accord with the emerging evidence for the SAC set out above; do you agree with this approach and are there any other options to consider?

Open space, green infrastructure and landscaping

Key Issues

9.29 Delivery of site developments which support and enhance the existing network of high quality open spaces and which meet the standards identified by the Council.

- This is a function of ensuring that new development proposals provide a sufficient quantity, quality and mix of open spaces to meet the requirements of local communities going forward. An important consideration will be supporting measures to address the differing needs of different sections within the community. The 2017 Open Space Strategy highlighted a number of possible deficiencies most notably with regard to the distribution of children's and young adult provision and in relation to the level of accessibility to allotments. New development offers a potential opportunity to contribute to enhanced provision of open space and the possibility of addressing any deficiencies. Maintaining the quality of the current supply of open spaces is also an issue in this respect and there is a potential role in capturing developer contribution to support this objective.

9.30 Achieving a balance between open spaces for people and open spaces for nature.

- Accessible natural and semi-natural greenspaces are defined by Natural England as 'land water and geological features which have been naturally colonised by plants and animals and which are accessible by foot to large numbers of residents'. It has generally been considered that the rural nature of the district combined with an extensive network of public rights of way which connect settlements with the Open Countryside affords a good level of access to natural and semi natural spaces. A priority of the 2017 Open Space Strategy is to increase the naturalness of existing and new open space provision and this should be reflected in policy requirements going forward.

9.31 Contributing to the Green Infrastructure Network.

- Green Infrastructure is the network of green spaces, rivers and lakes that intersperse and connect villages, towns and cities. Green Infrastructure supports the connection between people and nature. It can also provide a number of other benefits including supporting biodiversity, flood attenuation, food production, water management and climate change mitigation etc. Careful planning of new development provides the opportunity for adding local green infrastructure. Incorporating green infrastructure links into site design provides residents with easy access to green spaces and recreational and informal leisure opportunities that can support health and wellbeing.

9.32 Promoting landscape-led development layouts.

- It is considered that the landscape structure must inform the layout of the site. This should include an open space hierarchy of smaller to larger open spaces and should follow best practice urban design principles, including measures that support residents' health and wellbeing. Proposals should also respect, retain and enhance existing landscape features.

Existing Policy

National Policy

- 9.33 National Policy identifies the health and wellbeing contributions which can be derived from open space and green infrastructure provision. Policy Guidance also notes the valuable role which open space plays as part of the wider landscape and the setting of the built environment. New provision should be based on up-to-date assessments and policy protection for existing open spaces and recreational facilities should be in place. Evidence should be submitted on the requirement for replacement of any open space where development is proposed. Significant open space can be designated as Local Green Space where specific criteria are met. Such spaces are afforded the same policy protection as is applied to Green Belt land.

Local Policy

- 9.34 The adopted Core Strategy promotes the provision of an appropriate network of high quality accessible open space, sport and recreation facilities (CP14). A requirement of new development is to support an adequate supply new accessible public open space, play facilities and sport and recreation facilities to serve new residents (Policy EQ13). The Core Strategy also aims to prevent the loss of any existing indoor and outdoor open space unless there is a proven surplus or appropriate compensatory facilities are provided (Policy HWB1). Policy HWB2 of the Core Strategy recognises and supports the role of the Green Infrastructure network and promotes measures to improve and expand the network. Details of the specific amounts and types of open space provision associated with new developments are contained within the Site Allocations Document (SAD). Policy SAD7 has established specific open space requirements for community greenspaces and Multi Use Games Areas associated with new development.

Question 76:

What are your views on the level and variety of open space provision in the district? Should there be a greater emphasis on a particular type of open space (e.g. incorporating natural and semi natural elements)?

Question 77:

Should we review the current Open Space Standards set out in Policy SAD7 of the SAD to reflect the findings of an updated Open Space Audit?

Adapting to a changing environment

Key Issues

9.35 **To ensure that new build homes are high quality well designed homes that are energy efficient and positively contribute to the health and wellbeing of residents.**

- See Design and Residential Amenity section (p.66).

9.36 **There is a need to investigate through local evidence how to facilitate energy conservation measures to achieve higher than national minimum energy efficiency standards in new build; and to what extent it would improve the district's overall poor emissions and energy performance.**

- The existing Local Plan promotes the Code for Sustainable Homes to achieve higher energy (and low carbon) performance through new build homes. This Code has now been cancelled and therefore there is a need to consider if new local policies that achieve a higher standard above the national minimum are justified. Energy efficiency build measures could include: enhanced insulation, glazing, airtightness, energy control, efficient lighting and high efficiency heating. Higher carbon reduction could be achieved through the use of air source heat pumps, photovoltaics or other renewables.

9.37 **Providing the most sustainable renewable and low carbon energy generation sources through the Local Plan.**

- There is a need to set out our commitment to minimise energy demand and maximise the use of renewable low carbon energy. This will involve planning for evolving technology in decentralised and low carbon heat and power where it is demonstrated to be effective and viable. A more resilient energy network would need to be able to respond to intermittent, fluctuating production from renewable power.

Existing Policy

National Policy

9.38 The NPPF requires local authorities to plan proactively for mitigating and adapting to the changing climate and environment. Plans should support the national transition to a low carbon future, contributing to reductions in greenhouse gas emissions. There is also a requirement to take account of flood risk, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

9.39 In 2015, the Government announced a number of changes to the building regulations framework including a number of optional technical standards, although this did not include standards relating to energy efficiency. However, the Government's Clean Growth Strategy 2017 includes a commitment to improve energy efficiency with some clear statements of intent that housing needs to become more energy efficient and low carbon.

Local Policy

- 9.40 Through the Council’s current Local Plan the Council supports the Government’s target of at least an 80% reduction in greenhouse gas emissions by 2050, and at least 34% by 2020 (against a 1990 baseline), as headlined in the Climate Change Act of 2008.
- 9.41 The Council’s adopted Core Strategy, Policy EQ5, Sustainable Resources and Energy Efficiency, aims to ensure that development minimises environmental impacts, including lowering the demand for energy and securing the highest viable standards of energy efficiency for all new build and retrofitted developments, reducing carbon emissions. The impact of this policy was significantly reduced following the withdrawal of the Code for Sustainable Homes 2015.

Policy Options

Table 38: Adapting to a changing environment policy options

Fabric and Energy Conservation
<p>Option A: Continue building to present energy efficiency standards in Building Regulations and local policies. These policies encourage higher design and energy efficiency standards.</p>
<p>This could result in lost opportunity to create energy savings for occupiers, together with lower carbon and air quality savings for the future. This could also make it more challenging for the district to reduce its overall emissions and therefore remain below England’s average. This would have a detrimental effect on our local environment, and the people and places we live in.</p>
<p>Option B: Investigate whether standards equivalent to introducing higher fabric energy efficiency low carbon standards are appropriate and deliverable in South Staffordshire to:</p> <ol style="list-style-type: none"> 1) all new build homes across all mix; or 2) House types and tenures that tend to house more vulnerable residents e.g. new build Affordable Homes and housing aimed at an ageing population <p>This could be accompanied by a high quality level of service provision (e.g. an efficient boiler, low energy lighting etc.)</p>
<p>This would ensure homes are built to improved quality and energy efficiency low carbon standards which could result in warmer homes and reduced fuel bills. This would have positive health and wellbeing benefits and see homes future proofed against costly retrofit later. It would maximise the district’s ability to meet the national targets by offsetting carbon emissions from existing high emission homes in the district. However, evidence would need to be gathered to support taking this approach.</p>
<p>Option C: To investigate a policy that requires upgrading of existing energy inefficient buildings where a planning application is submitted on that building.</p>
<p>Measures could include improved insulation, heating systems, glazing and energy provision. This could make notable improvements in the district’s overall emissions levels, helping to meet the targets for average reduction, having a positive effect on home owners and the local environment.</p>
Renewable, Low Carbon Energy Generation
<p>Option D: Continue with current policy approach to districtwide delivery of renewable energy.</p>
<p>The current Local Plan seeks to meet a minimum of 9.6% of its energy demand through renewable energy sources by 2020 through a variety of technologies. In particular, opportunities for biomass and wind energy developments. However, due to rapidly evolving renewable and low carbon technologies, other energy and heat generation technologies may have greater benefit.</p>

Option E:

Further investigation into renewable and low carbon technologies to consider the potential for alternative energy generation sources on strategic sites (e.g 150+ units).

Investigate the potential for renewable energy technologies in the district informed by national and local evidence. This could consider the viability and effectiveness of rapidly evolving renewable technologies. Technologies appraised could include:

- Decentralised energy supply systems such as combined heat and power and heating and cooling networks (these often require design at the master planning stage).
- Energy storage (battery) which improves viability of intermittent renewable generation i.e solar photovoltaics (PV) and wind power

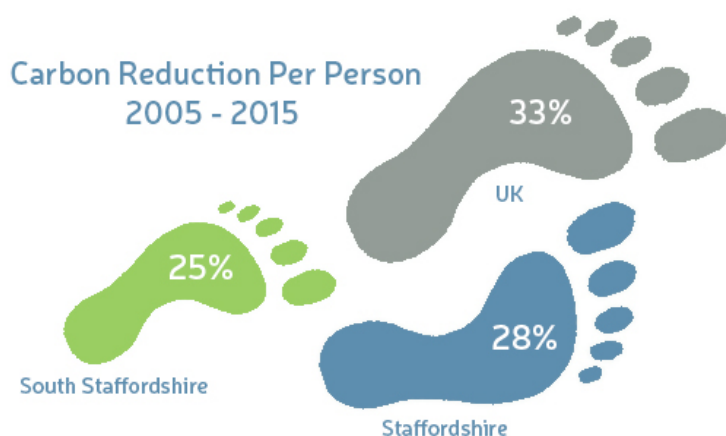
Option F:

Prepare more detailed guidance through a Sustainable Development Supplementary Planning Document.

This would help support the policy focus on energy conservation and energy generation measures and provide guidance on the technologies that are promoted.

Question 78:

Which of the above option(s) do you think should be pursued? Are there any other options to consider?



Flooding and pollution

Key Issues

9.42 **Ensure new development is designed and located in areas that minimise the risk and vulnerabilities from fluvial and surface water flooding now and into the future, considering updated climate projections data and tools.**

- South Staffordshire’s winters are likely to be milder and wetter, with summers hotter and drier, with more severe weather events than at present and a higher risk of flash flooding and storms all year round. Therefore it is important that areas of lower fluvial and surface water flood risk are prioritised when allocating sites for development. This

is key to ensuring that residents are resilient to the environmental effects arising from climate change.

9.43 The need to update the Council’s Strategic Flood Risk Assessment (SFRA).

- Engagement with the Environment Agency has confirmed that an updated SFRA is needed to support the Local Plan review.

9.44 To consider if higher water efficiency standards are needed.

- The Government’s housing technical standards published in 2015 included the provision for adopting higher water efficiency standards. Whilst this would be implemented through Building Control, there is a need to consider this through the local plan process to provide the necessary justification for higher standards.

9.45 To ensure that new development take account of the effects of pollution.

- Air and water quality and the impacts of noise and light pollution are key considerations which can arise as a result of new development proposals. Separate consent regimes govern the discharge of pollutants into the atmosphere or into water bodies however the planning system needs to take into account the proximity of sensitive development to potential sources of pollution and can seek to reduce the negative impacts associated with noise and light pollution.

Existing Policy

National Policy

- 9.46 National policy confirms that plans should take a proactive approach to considering the long term implications for flood risk, informed by a flood risk assessment. Plan should take a sequential approach to identifying sites, avoiding allocating in areas of higher flood risk and set out policies to manage flood risk from all sources. Planning policy should ensure that new development is appropriate for its location taking into account the likely effects of pollution on health and living conditions. This includes mitigating and minimising the effects of noise, protecting areas of tranquillity and limiting the impact of light pollution. Opportunities to improve air quality should be identified and decisions should ensure that new development can be effectively integrated with existing land uses.

Local Policy

- 9.47 Core Policy 3 of the adopted Core Strategy covers sustainable development and climate change and seeks to guide development away from known areas of flood risk. Policy EQ7 covers water quality and seeks to ensure that development does not have a negative impact on water quality through surface or groundwater pollution or through overloading wastewater treatment works. Policy EQ9 requires that new development should address the impacts of noise and light pollution on residential amenity and seeks to locate developments where such conflicts will be reduced. Policy EQ10 seeks to protect the public and the natural environment from actual or potential hazardous activities.

Question 79:

Do you support higher water efficiency standards over and above those required through Building Regulations? If yes, what evidence is needed to support these?

Question 80:

Is a Water Cycle Study needed to inform the Local Plan review, or would engagement with the appropriate agencies throughout plan preparation be sufficient to ensure that proposals don't have an adverse effect on the water environment?

Historic environment

Key Issues

9.48 Ensuring that new development respects the historic environment and heritage assets.

- It is considered highly probable that the levels of development during the plan period to 2037 will be significantly higher than during the current plan period. This could place increased pressure on heritage assets and upon the wider historic landscape. It also presents potential opportunities to promote a quality of development which respects that heritage and better reveals its significance.

9.49 Promoting a positive approach towards the conservation and enjoyment of the historic environment.

- The NPPF promotes a positive strategy in relation to the management and enjoyment of the historic environment. This suggests an approach that seeks positive outcomes for the historic environment as a result of new development and promotes positive uses for heritage assets.

9.50 The weight afforded to local non-statutorily protected assets.

- In addition to the statutorily designated assets there are a range of local heritage assets including the wider historic landscape and particularly significant views associated with heritage assets and landscapes which need to be given consideration during the decision making process.

Existing Policy

National Policy

- 9.51 National policy confirms that heritage assets should be conserved in a manner appropriate to their significance. This is a broad definition encompassing both designated assets and those identified by local planning authorities. In planning for new development the NPPF identifies the potential interaction with new development taking influences from the existing character of the historic environment and making a positive contribution to local character and distinctiveness. This should be reflected through a positive local plan strategy to promote the

conservation and enjoyment of the historic environment. The amount of weight to be given to the conservation of a heritage asset should reflect its significance and the nature of the harm which is likely to occur as a result of the proposed development. When considering the impact of development on an asset’s significance, great weight should be given to the asset’s conservation, irrespective of the degree of potential harm. The NPPF is clear that all heritage assets are irreplaceable and therefore any harm or loss requires clear justification.

Local Policy

9.52 The Core Strategy includes an overarching strategic policy CP2 which promotes development where this will protect, conserve and enhance heritage assets, and requires that development proposals should be consistent with the NPPF. Policy EQ3 provides additional detail on specific measures and approaches which will be adopted by the Council in support of the conservation and enhancement of the historic environment. It is worth noting that whilst the local list is mentioned as an information source there is no policy consideration of what weight should be afforded to such designations though this is discussed within the NPPF.

Policy Options

Table 39: Historic environment policy options

<p>Option A: Continue with the existing policy approach of setting out expectations on the conservation and enhancement of heritage assets.</p>
<p>This would retain the existing policy approach and focus on the conservation and enhancement of heritage assets, where decisions on development which affect assets are taken on the basis on informed judgements and where the sustainable reuse of heritage assets is promoted.</p>
<p>Option B: Continue with the existing policy approach but with more detailed guidance provided through a Supplementary Planning Document,</p>
<p>This would retain the policy focus on the conservation and enhancement of heritage assets. However, this policy would be accompanied by an SPD setting out in greater detail how development should take account of existing character of historic assets, and how such assets can inform aspects such as the design, scale and type of new development.</p>

Question 81:
Which of the above option(s) do you think should be pursued? Are there any other options to consider?



19 Conservation Areas (16 in the villages)

10. Strategic Policies and Sites

Strategic policies

10.1 National policy sets out that Local Plans should identify strategic policies that provide an overall strategy for the pattern and scale of development for the area. These should be limited to those matters necessary to address the strategic priorities of the area (and any relevant cross-boundary issues), to provide a clear starting point for any non-strategic policies that may be needed. These non-strategic policies will extend to more detailed matters and can be set out in either the Local Plan or Neighbourhood Plans. The NPPF (Paragraph 20) confirms that strategic policies should ensure that sufficient provision is made for specific development types including, conservation and enhancement of the built environment, housing, retail, employment and infrastructure. The table below sets out the policy themes discussed in this paper, with the areas we believe require a strategic policy identified. At this stage it is unclear whether some topics will require a strategic policy as this will depend on which policy option is pursued. For example, for self and custom build housing a policy that requires sites above a certain threshold to provide a proportion of plots for self-build would require a strategic policy; whereas a less prescriptive policy supporting this type of housing may not.

Requires strategic policy	
May require strategic policy and/or a non-strategic policy dependent on preferred policy approach	
Requires a non-strategic policy	

Policy theme	Requires a strategic policy	Relationship to strategic priorities
Quantum of growth (housing and employment)		Relates to strategy for scale of development and homes and workplaces needed.
Distribution of growth (Spatial Strategy)		Relates to strategy for pattern of development.
Strategic allocations		Relates to strategy for pattern of development and homes and workplaces needed.
Housing mix		Relates to homes needed.
Homes for Older People and Specialist Housing		Relates to homes needed.
Affordable housing		Relates to homes needed, including affordable housing.
Rural exception sites		Relates to homes needed but is led by demand at a local (e.g. parish) level.
Entry level exception sites		Relates to homes needed and may be strategic if policy addresses housing mix/tenure.
Self and Custom Build housing		Relates to homes needed insofar as policy provides for self and custom build plots.
Gypsies, Travellers and Travelling Showpeople		Relates to homes needed and strategy for scale and pattern of development.
Design and residential amenity		Not necessary to have a policy to ensure the provision of needed forms of development set out in NPPF.

Parking provision		Not necessary to have a policy to ensure the provision of needed forms of development set out in NPPF.
Space about dwellings and internal space standards		Will need to be viability tested to ensure the standards can be delivered on the homes needed in the area, so should be considered alongside strategic policies.
Health and wellbeing		As policy will likely relate to design measures, not necessary to have a policy to ensure the provision of needed forms of development set out in NPPF.
Leisure Facilities		Necessary to provide community facilities/green infrastructure.
Education		Necessary to provide community facilities (e.g. education).
Children play and youth development		Necessary to provide community facilities/education/cultural infrastructure.
Community Safety		As policy will likely relate to design measures, not necessary to have a policy to ensure the provision of needed forms of development set out in NPPF.
Employment sites		Relates to strategy for pattern of development and workplaces needed.
Inclusive growth		Relates to workplaces needed.
Rural employment and tourism		Relates to workplaces needed and strategy for pattern of development.
Village centres and retail		Relates to provision of appropriate retail, leisure and other commercial development.
Protecting community services and facilities		Relates to the retention of community facilities needed.
Wolverhampton Halfpenny Green Business Airport		A non-strategic policy to guide new development at the airport
Infrastructure		Relates to the provision of appropriate infrastructure to support overall strategy.
Public transport and highway network		Relates to the provision of transport infrastructure to support overall strategy.
Electronic communications		Relates to the provision of electronic communications infrastructure to support overall strategy.
Green Belt		Relates to the overall strategy for the pattern of development.
Open Countryside		Relates to the overall strategy for the pattern of development.
Landscape character		Necessary to provide conservation and enhancement of the natural environment.
Natural environment		Necessary to provide conservation and enhancement of the natural environment.
Cannock Chase Area of Outstanding Natural Beauty (AONB) and Special Area of Conservation (SAC).		Necessary to provide conservation and enhancement of the natural environment.
Open space, green		Necessary to provide conservation and

infrastructure and landscaping		enhancement of the natural environment.
Adapting to a changing environment		Necessary to provide climate change mitigation and adaptation.
Flooding and Pollution		Necessary to provide flood risk mitigation and address water supply and wastewater issues
Historic Environment		Necessary to provide conservation and enhancement of the historic environment

Table 40: Strategic and non-strategic policies

Question 82:

Do you agree with policy themes above that have been identified as requiring a strategic policy?

Question 83:

Are there any other areas that will require a strategic policy; or are there any areas identified as requiring a strategic policy where it would be more appropriate to provide a non-strategic policy?

Strategic sites

10.2 The NPPF is clear that strategic policies should not extend to more detailed matters that are more appropriately dealt with through Neighbourhood Plans or other non-strategic policies. It also sets out that 10% of an authorities housing requirement should be on small sites of 1ha or less, meaning that a number of the smaller allocations in the plan would sit under a non-strategic policy, enabling these to be allocated either through non-strategic policies in the Local Plan or Neighbourhood Plans. Therefore, it is important that we determine the size threshold above which sites would be considered a strategic allocation.

10.3 To assist in identifying which housing and employment sites would be considered to be strategic sites in the Local Plan, the Council proposes the following thresholds:

- **Any site providing a minimum of 150 dwellings**
- **Any housing or employment site of 5ha or greater**

10.4 The above thresholds reflect the criteria used to consider which applications are so significant as to warrant recovery by the Secretary of State in the planning appeal process. These criteria also offer a proportionate approach to identifying a range of sizes of strategic housing sites, ensuring that sites are significant enough in size to be considered strategic in scale, whilst ensuring that there is still scope to identify strategic sites which will contribute significantly to the Council's five year housing land supply.

Question 84:

Do you agree with the proposed thresholds for identifying strategic site allocations?

Appendix 1: Full list of questions

Policy Theme & Questions
Chapter 3. What does the Local Plan need to consider
<p>Table 2: Strengths, Weaknesses, opportunities, threats</p> <p>Question 1: Are there any other strengths, weaknesses, opportunities and threats to South Staffordshire that you feel should be identified in the Local Plan? If yes, then please provide details. Should anything be deleted?</p>
<p>Local Plan issues and challenges</p> <p>Question 2: Are there any other issues that the Local Plan can address in South Staffordshire? Are the issues and challenges appropriate and sufficient to inform the Local Plan? If not, what should be added or deleted?</p>
<p>Vision and objectives</p> <p>Question 3: Do you have any comments on the vision, and objectives to deliver the vision set out above? If yes, then please provide details.</p>
<p>Table 3: Evidence base</p> <p>Question 4: Do you think that the key evidence set out in Table 3 is sufficient to support the preparation of the Local Plan review? If not, what additional evidence is required?</p>
<p>Infrastructure Delivery Plan</p> <p>Question 5: Is the information contained in the Infrastructure Delivery Plan October 2018 the most up to date? If not please provide details. Are there any other specific infrastructure issues that the Local Plan should look to address? If no, then what further evidence is required?</p>
Chapter 4. Level of Growth
<p>Table 4: Housing level of growth policy options</p> <p>Question 6: Do you agree that Option C represents an appropriate and proportionate housing target for the Local Plan review, having regard to the Council’s own needs and the needs of the wider Greater Birmingham Housing Market Area?</p> <p>Question 7: Are there any other options to consider, including a different housing requirement not included in the range of options above?</p> <p>Question 8: Is the plan period of 2018 – 2037 an appropriate response to the Government’s guidance on meeting housing needs? Should we consider an alternative plan period?</p> <p>Question 9: The NPPF requires us to approach all neighbouring authorities before releasing Green Belt for unmet housing needs and to plan for cross-boundary needs over the most appropriate functional geography. In light of this, is the Greater Birmingham Housing Market Area the most appropriate</p>

<p>geography over which to address unmet housing needs?</p>
<p>Safeguarded land/reserve housing sites Question 10: Should the Council identify additional safeguarded land through the new Local Plan? If so, how much should be identified? Is there an alternative approach that the Council could take?</p>
<p>Table 5: Gypsy, Traveller & Travelling Showpeople policy options Question 11: Which of the above option(s) do you think should be pursued? Are there any other options to consider?</p> <p>Question 12: Do you agree that the need identified in the Gypsy, Traveller and Travelling Showpeople Accommodation Assessment 2017 is appropriate and in line with national guidance?</p>
<p>Table 6: Employment level of growth policy options Question 13: Which of the above option(s) do you think should be pursued? Are there any other options to consider?</p> <p>Question 14: Do you agree that the EDNA (stage 1) has been undertaken in line with national guidance and is a robust starting point for planning for future employment needs?</p>
<p>SFRI Question 15: If granted approval, what implications will the SRFI proposal at Four Ashes have for the Local Plan review?</p>
<p>Retail – level of growth Question 16: Can the Council continue to rely on its existing approach to meeting the retail needs of the district in the existing village centres and the facilities in the adjacent urban area? Is any other evidence required to support the retail needs of future development areas in the district?</p>
<p>Chapter 5. Locations for Growth</p>
<p>Housing density Question 17: Should the Council introduce a minimum density standard of 35 dwellings per hectare on all housing sites? If not, what factors should the Council consider when considering setting minimum density standards?</p>
<p>Table 7: Revised Settlement Hierarchy Question 18: Are the Council’s revised Rural Settlement Hierarchy and the Rural Settlement Hierarchy Study (2018) robust and consistent with national policy?</p>
<p>Spatial distribution policy options Question 19: Which of the Spatial Distribution Policy Options do you think should be pursued? Are there any other options to consider, including any strategy which aims to provide a mixture of the policy options set out above?</p>

Table 8: Employment locations for growth

Question 20:

Which of the above option(s) do you think should be pursued? Are there any other options to consider, including a strategy which aims to provide a mixture of the spatial options set out above?

Question 21:

If it is appropriate for the Council to consider the delivery of new freestanding strategic employment sites, what criteria should be used in identifying new strategic sites for employment growth?

Chapter 6. Methodology – preferred spatial distribution and sites for development

Preferred spatial option

Question 22:

Has the Council identified the key factors which should inform which of the Spatial Distribution Policy Option(s) is taken forward in the Local Plan review? If not, what other factors should inform the spatial distribution of development?

Selecting preferred sites

Question 23:

Do you agree that the factors above represent the key considerations for selecting the preferred sites?

Question 24:

In addition to the factors set out above, are there any other material planning considerations which should be used to for selecting sites? If yes, then please provide details

Question 25:

Are any of the factors more important than others for identifying sites for development, and should these have greater weighting in site selection process? If yes, then please provide details.

Question 26:

Should sites only be taken forward for consideration where they are large enough to accommodate 10 or more dwellings - above the Government's threshold at which we can ask for on-site Affordable Housing? If yes, is there any conflict with this approach and the national requirement for 10% of sites in the Plan to be on sites of 1ha or less?

Question 27:

Should different factors be used for site selection depending on the use? For example, should different factors be used for identifying the best locations for employment sites or Gypsy, Traveller and Travelling Showpeople pitches/plots?

Chapter 7. Homes and Communities

Table 9: Housing mix policy options

Question 28:

Which of the option(s) do you think should be pursued? Are there any other options to consider?

Table 10: Specialist housing policy options

Question 29:

Which of the option(s) do you think should be pursued? Are there any other options to consider?

Table 12: Affordable housing percentage requirement policy options

<p>Question 30: Which of the option(s) do you think should be pursued? Are there any other options to consider?</p>
<p>Table 13: Affordable housing tenure split policy options</p> <p>Question 31: Which of the option(s) do you think should be pursued? Are there any other options to consider?</p>
<p>Table 14: Affordable housing boosting supply policy options</p> <p>Question 32: Which of the option(s) do you think should be pursued? Are there any other options to consider?</p>
<p>Table 15: Rural exception sites policy options</p> <p>Question 33: Which of the option(s) do you think should be pursued? Are there any other options to consider?</p>
<p>Table 16: Entry level exception sites policy options</p> <p>Question 34: Which of the option(s) do you think should be pursued? Are there any other options to consider?</p>
<p>Table 17: Self and customhouse building policy options</p> <p>Question 35: Which of the option(s) do you think should be pursued? Are there any other options to consider?</p> <p>Question 36: If a threshold was set as per Option B, what would be an appropriate threshold where plots should be provided?</p>
<p>Table 18: Gypsies, Travellers & Travelling Showpeople policy options</p> <p>Question 37: Which of the above option(s) do you think should be pursued? Are there any other options to consider?</p> <p>Question 38: Do you consider there to be any specific criteria that should be used for identifying Travelling Showpeople plots?</p> <p>Question 39: Should pitches be allocated based on a split between those travellers that meet the PPTS definition, as well as those that fall outside the PPTS definition?</p> <p>Question 40: Are the existing criteria in Policy H6 still appropriate for assessing planning applications for Gypsy and Traveller and Travelling Showpeople sites/plots? Should the same criteria be used for identifying the sites/plots to allocate in the new Local Plan?</p>
<p>Table 19: Design and residential amenity policy options</p> <p>Question 41: Which of the option(s) do you think should be pursued? Are there any other options/design measures to consider?</p>
<p>Table 20: Public and residential parking policy options</p> <p>Question 42: Which of the option(s) do you think should be pursued? Are there any other options to consider?</p> <p>Question 43:</p>

Should we allocate new HGV parking and if so what evidence would need to be prepared to inform this? If a need for additional facilities were identified, should there be a focus on extending existing facilities, or should wholly new facilities be identified?

Table 21: Space about dwellings policy options

Question 44:

Which of the option(s) do you think should be pursued? Are there any other options/design measures to consider?

Table 22: Internal space policy options

Question 45:

Which of the option(s) do you think should be pursued? Are there any other options/design measures to consider?

Table 23: Health and wellbeing policy options

Question 46:

Which of the option(s) do you think should be pursued? Are there any other options/design measures to consider?

Table 24: Leisure facilities policy options

Question 47:

Are there any areas of the district where the quality and/or quantity of sport and leisure provision are lacking? If so, please provide details, and do you have evidence to support this?

Education

Question 48:

Where it can be demonstrated that new residential development necessitates a new school, should the school be delivered on site alongside the residential development? Should there be a threshold where sites can be realistically be expected to deliver a school? E.g only on strategic allocations (e.g. 150+ homes)

Question 49:

Is there a need to carry forward a specific policy to guide development at South Staffordshire College (Rodbaston) through to the Local Plan review?

Table 25: Children’s play and youth development policy options

Question 50:

Which of the option(s) do you think should be pursued? Are there any other options to consider?

Community safety

Question 51:

Is there a need to carry forward Core Policy 13 and Policy CS1 to the new Local Plan or should we defer to national policy when considering community safety issues through planning applications?

Chapter 8. Economic vibrancy

Table 26: Employment sites policy options

Question 52:

Should we allocate new sites for specific employment use classes? What should the breakdown between the B1, B2 and B8 class uses be? Please provide evidence to support your response.

Question 53:

If we continue with a criteria based policy that safeguards employment land for that use unless specific criteria can be met, are the criteria in the existing Core Strategy Policy_EV1 still appropriate or should they be revised?

Question 54:

Should we be looking to allocate office (B1a) use given their status as a town centre use and the lack of main towns in the district?

Question 55:

Should the current approach of relying on neighbouring urban town and cities to meet our higher order office needs continue?

Table 27: Inclusive growth policy options

Question 56:

Which of the above option(s) do you think should be pursued? Are there any other options to consider, for example setting a different threshold for the scale of development where an ESP will be required?

Question 57:

Are there any other measures, besides requiring an Employment and Skills Plan that the Local Plan should consider that will improve the skills and access to jobs for people in the district?

Question 58:

Should we produce an Inclusive Growth SPD to provide guidance on the process of agreeing an ESP and what could be included in it?

Table 28: Rural employment and tourism policy options

Question 59:

Which of the option(s) do you think should be pursued? Are there any other options to consider?

Table 29: Village centres and retail policy options

Question 60:

Which of the option(s) do you think should be pursued? Are there any other options to consider?

Table 30: Protecting community services and facilities

Question 61:

Which of the option(s) do you think should be pursued? Are there any other options to consider?

Table 31: Wolverhampton Halfpenny Green Airport

Question 62:

Which of the option(s) do you think should be pursued? Are there any other options to consider?

Table 32: Infrastructure policy options

Question 63:

Which of the option(s) do you think should be pursued? Are there any other options to consider?

Question 64:

Should the Local Plan review carry forward Policy EQ13 of the adopted Core Strategy which outlines instances development contributions will be sought? Are there any other cases where contributions should be required?

Table 33: Public transport and highway network policy options

Question 65:

Which of the option(s) do you think should be pursued? Are there any other options to consider?

Question 66:

Are there any areas where highway capacity is a concern where

- Development should be restricted; or
- Where new development could facilitate road infrastructure improvements

Question 67:

Should the Local Plan include a policy that requires development to incorporate electric charging points? Should there be a threshold for the number of new dwellings on a new development where this would be required?

Electronic communications

Question 68:

Do you support keeping our existing criteria based policy setting out the circumstances electronic communications development - in need of planning permission - will be permitted?

Question 69:

Should the new Local Plan include a policy that requires all new housing and employment developments to have a connection to fibre optic broadband?

Chapter 9. Natural and Built Environment

Table 34: Green Belt policy options

Question 70:

Which of the option(s) do you think should be pursued? Are there any other options to consider?

Question 71:

What compensatory improvements (to offset removing land from the Green Belt) to the environmental quality and accessibility of remaining Green Belt land should be considered and how should they be implemented?

Table 35: Open countryside policy options

Question 72:

Which of the option(s) do you think should be pursued? Are there any other options to consider?

Table 36: Landscape character policy options

Question 73:

Which of the option(s) do you think should be pursued? Are there any other options to consider?

Table 37: Natural environment policy options

Question 74:

Which of the option(s) do you think should be pursued? Are there any other options to consider?

Cannock Chase AONB and SAC

Question 75:

We believe that Core Strategy Policy EQ2 should be updated to accord with the emerging evidence for the SAC set out above; do you agree with this approach and are there any other options to consider?

Open space, green infrastructure and landscaping

Question 76:

What are your views on the level and variety of open space provision in the district? Should there be a greater emphasis on a particular type of open space (e.g. incorporating natural and semi natural elements)?

Question 77:

Should we review the current Open Space Standards set out in Policy SAD7 of the Site Allocations Document (SAD) to reflect the findings of an updated Open Space Audit?

Table 38: Adapting to a changing environment policy options

Question 78:

Which of the option(s) do you think should be pursued? Are there any other options to consider?

Flooding and pollution

Question 79:

Do you support higher water efficiency standards over and above those required through Building Regulations? If yes, what evidence is needed to support these?

Question 80:

Is a Water Cycle Study needed to inform the Local Plan review, or would engagement with the appropriate agencies throughout plan preparation be sufficient to ensure that proposals don't have an adverse effect on the water environment?

Table 39: Historic environment policy options

Question 81:

Which of the option(s) do you think should be pursued? Are there any other options to consider?

Chapter 10. Strategic policies and sites

Table 40: Strategic and non-strategic policies

Question 82:

Do you agree with policy themes above that have been identified as requiring a strategic policy?

Question 83:

Are there any other areas that will require a strategic policy; or are there any areas identified as requiring a strategic policy where it would be more appropriate to provide a non-strategic policy?

Strategic sites

Question 84:

Do you agree with the proposed thresholds for identifying strategic site allocations?

Appendix 2: Glossary

Adoption – The final stage of the plan making process. The plan is adopted by resolution of a full meeting of the Local Planning Authority (LPA). This formally confirms the plan as council policy.

Affordable Housing (or sub-market housing) – As per the Government NPPF definition: housing for sale or rent, for those whose needs are not met by the market. This includes: affordable housing for rent (such as social rent, affordable rent or at least 20% below local market rents), starter homes, discounted market sales housing, and other affordable routes to home ownership (such as shared ownership).

Authority Monitoring Report (AMR) – A report produced by the LPA to show how the Authority is performing against all agreed targets.

Appropriate Assessment (AA) – An assessment of the potential effects of a proposed plan – in combination with other plans and projects – on sites designated as part of a European network of designated nature conservation areas including Special Areas of Conservation (SACs). The Assessment itself is a statement that says whether the plan does, or does not, affect the integrity of the European site. The appropriate assessment forms part of the Habitats Regulations Appraisal (HRA) process.

Area of Outstanding Natural Beauty (AONB) - An area with statutory national landscape designation, the primary purpose of which is to conserve and enhance natural beauty.

Authorised social site – An authorised traveller site owned by either the local authority or a Registered Housing Provider.

Authorised private site – An authorised traveller site owned by a private individual (who may or may not be a Gypsy or a Traveller). These sites can be owner-occupied, rented or a mixture of owner-occupied and rented pitches. They may also have either permanent or temporary planning permission.

Biodiversity - The whole variety of life encompassing all genetics, species and ecosystem variations, including plants and animals.

Brownfield Land and Sites - See 'Previously-Developed Land'.

Climate Change - Long-term changes in temperature, precipitation, wind and all other aspects of the Earth's climate, primarily considered to be the consequence of human activity and fossil fuel consumption.

Community Facilities

Community facilities provide for the health, welfare, social, educational, spiritual, recreational, leisure and cultural needs of the community.

Community Forest - A large area of land transformed into a wooded landscape by a partnership of local authorities, national agencies and private, voluntary and community organisations to support employment, recreation, education and wildlife. The Forest of Mercia is a Community Forest.

Conservation Area - Areas of special architectural or historic interest, the character, appearance or setting of which it is desirable to preserve or enhance.

Core Strategy – A Development Plan Document (DPD) which forms part of the Local Plan, that sets out the long-term spatial vision and spatial objectives for the LPA area and the strategic policies and proposals to deliver that vision.

Cultural Strategy - A Cultural Strategy aims to “promote the cultural well-being” of the area it covers.

Cycle Network - An integrated network of both on and off road routes to facilitate an easier and safer journey for cyclists.

Density - In the case of residential development, a measurement of either the number of habitable rooms per hectare or the number of dwellings per hectare.

Design guide - A document providing guidance on how development can be carried out in accordance with the design policies of a local authority or other organisation often with a view to enhancing local character.

Development - Development is defined under the 1990 Town and Country Planning Act as "the carrying out of building, engineering, mining or other operation in, on, over or under land, or the making of any material change in the use of any building or other land." Most forms of development require planning permission (see also “permitted development”).

Development Brief - A document identifying the constraints and opportunities presented by a potential development site.

Development Management - The process whereby a local planning authority manages, shapes, and considers the merits of a planning application and whether it should be given permission having regard to the development plan.

Development Plan – Also known as the Local Plan, the term given to the documents setting out the adopted planning policies to guide development within the District. Decisions on planning applications are to be taken in accordance with the Development Plan unless material considerations indicate otherwise.

Development Plan Documents (DPDs) – Spatial planning documents prepared by the LPA and subject to Independent Examination. For South Staffordshire, they include the Core Strategy, the Site Allocations Document (SAD), and the Policies Map. DPDs are required to have a Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA).

District Centres - Usually comprising groups of shops and some services, separate from the town centre, but with more variety than local centres. Can include suburban centres.

EDNA - An objective assessment of the quantity and type of employment space required within the Local Planning Authority area

Employment Land Study – An assessment of the suitability of sites for employment development. The study is used to inform decisions on which sites should be safeguarded in the face of competition from other higher value uses and which sites may be considered suitable for other alternative uses.

European Site Nature conservation sites afforded the highest level of protection in the UK through European legislation. They include Special Areas of Conservation (SAC), candidate (cSAC), Special Protection Areas (SPA), proposed (pSPA), European offshore Marine Sites and Ramsar.

Evidence Base – The researched, documented, analysed and verified basis for all the components of a Local Plan. The work used to create the Local Plan can be published in the form of background papers.

Flood Plain - Generally flat-lying areas adjacent to a watercourse, tidal lengths of a river or the sea where water flows in times of flood or would flow but for the presence of flood defences.

Flood Risk Assessment - An assessment of the likelihood of flooding in a particular area so that development needs and mitigation measures can be carefully considered.

Front-loading - The important pre-production community participation processes involved in preparation of a Local Plan. The Statement of Community Involvement (SCI), Local Development Scheme (LDS) and the Authority Monitoring Report (AMR) play a large part in ensuring front-loading.

Green Belt (not to be confused with the term ‘greenfield’) – A statutory designation for open land around certain cities and large built-up areas, which aims to keep this land permanently open or largely undeveloped. The purposes of Green Belt are to:

- check the unrestricted sprawl of large built up areas;
- prevent neighbouring towns from merging;
- safeguard the countryside from encroachment;
- preserve the setting and special character of historic towns; and
- assist urban regeneration by encouraging the recycling of derelict and other urban land.

Greenfield Land or Site - Land (or a defined site) which has never been built on before or where the remains of any structure or activity have blended into the landscape over time.

Green Infrastructure - a network of green spaces and other environmental features including street trees, gardens, green roofs, community forests, parks, rivers, canals and wetlands. Green Infrastructure includes established green spaces and new sites and should thread through and surround the built environment and connect the urban area to its wider rural hinterland.

Gypsy – Members of Gypsy or Travellers communities. Usually used to describe Romany (English) Gypsies originating from India.

Gypsy and Travellers – The Government defines Gypsies and Travellers for planning purposes as ‘Persons of a nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family’s or dependants’ educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.

Gypsy and Traveller Accommodation Needs Assessment (GTAA) – An assessment of the accommodation needs of Gypsy and Traveller’s which establishes the pitch requirements over the lifetime of the plan period.

Habitat – An area of nature conservation interest.

Habitat Regulations Assessment (HRA) – An assessment of the potential impacts of plans and programmes on sites designated as of European Importance for their nature conservation value.

Heritage Asset – A building, monument, site, place, area or landscape identified as have a degree of merit because of its heritage interest.

Historic Landscape Assessment (HLA) – seeks to identify, and as far as possible, understand the historic development of today's landscape. It places emphasis on the contribution that past historic processes make to the character of the landscape as a whole, not just selected 'special sites' and can contribute to a wider landscape assessment.

Historic Environment Record (HER) – A comprehensive resource of the historic environment of Staffordshire. It provides information about archaeological sites, historic buildings, historic landscape and other heritage features within Staffordshire. The baseline historic environment data contained in the HER underpins a wide range of work undertaken for the Historic Environment and decision making.

Historic Parks and Gardens - A park or garden of special historic interest. Graded I (highest quality), II* or II. Designated by Historic England.

Housing and Economic Development Needs Assessments – An objective assessment of the quantity and type of housing and employment space required within the Local Planning Authority area. This assessment incorporates the requirement within the NPPF to produce a Strategic Housing Market Assessment.

Independent Examination – An examination held in public by an Inspector appointed by the Secretary of State into the policies and proposals within a Development Plan Document (DPDs). The examination will consider the “soundness” of the document. Following the inspection, the Inspector will where relevant submit a report to the Local Planning Authority proposing possible amendments to the submitted plan.

Irish Traveller – Member of one of the main groups of Gypsies and Travellers in Britain. Distinct from Gypsies but sharing a nomadic tradition, Irish Travellers were recognised as an ethnic group in England in 2000.

Issues and Options – a non-statutory stage of the plan making process during which different site and policy options may be considered and issued for consultation.

Infrastructure – The key services necessary to support development for example roads, sewerage, water, electricity, education and health facilities.

Key Diagram - The diagrammatic interpretation of the Spatial Strategy as set out in the Core Strategy Development Plan Document.

Landscape Character - The distinct and recognisable pattern of elements that occur consistently in a particular type of landscape. It reflects particular combinations of geology, landform, soils, vegetation, land use and human settlement.

Lifetime Homes – A standard comprising a range of design features to enable new housing to meet the changing needs of occupiers.

Listed Building - A building of special architectural or historic interest. Graded I (highest quality), II* or II.

Local Centre - Includes a range of small shops and perhaps limited services of a local nature, serving a small catchment. Sometimes also referred to as a local neighbourhood centre.

Local Development Document (LDD) – A local planning document which can be either a statutory Development Plan Document (DPD) or a non-statutory Supplementary Planning Document (SPD).

Local Development Scheme (LDS) – A document setting out the LPAs programme for the preparation of the Local Development Documents (LDDs) within a three-year period and a timetable for their production and review. It will also state which policies will be saved from the existing Local Plan.

Local Nature Reserve (LNR) – Sites of importance for wildlife, geology, education or public enjoyment.

Local Plan – A collection of statutory Development Plan Documents (DPDs) prepared by the LPA that sets out policies and allocations for delivering the economic, environmental and

social aims of the area. A number of SPDs will also provide additional guidance to the policies contained in the Local Plan.

For South Staffordshire the Local Plan consists of the following DPDs:

- The Core Strategy,
- The Site Allocations Document (SAD); and
- The Policies Map.

Local Planning Authority (LPA) - The local authority or council that is empowered by law to exercise planning functions. Often the local borough or district council.

Local Strategic Partnership (LSP) - An overall partnership of people that brings together organisations from the public, private, community and voluntary sector within a local authority area, with the objective of improving people's quality of life.

Local Transport Plan - A five-year integrated transport strategy, prepared by local authorities in partnership with the community, seeking funding to help provide local transport projects. The plan sets out the resources predicted for delivery of the targets identified in the strategy.

Material Consideration – A matter that should be taken into account in formulating planning policy and when determining a planning application.

Ministry of Housing, Communities and Local Government (CLG) – It is the aim of the Government to create sustainable communities. The HCLG is responsible for housing, planning, regional and local government, regeneration, social exclusion, neighbourhood renewal and the fire and rescue service.

Mixed Use (or mixed use development) - Provision of a mix of complementary uses, such as say residential, community and leisure uses, on a site or within a particular area.

Monitoring (and review) – The process of measuring (in terms of quantity and quality) the changes in conditions and trends, impact of policies, performance of the plan against its objectives and targets, and progress in delivering outputs. Please also refer to Annual Monitoring Report (AMR).

National Planning Policy Framework (NPPF) - The NPPF sets out the Government's planning policies for England and how these are expected to be applied. It sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.

Nature Conservation - The protection, management and promotion of wildlife habitat for the benefit of wild species, as well as the communities that use and enjoy them.

Neighbourhood Centre - A number of shops serving a local neighbourhood and separate from the district centre. Sometimes referred to as a Local Centre.

Open Space - All space of public value, including not just land, but also areas of water such as rivers, canals, lakes and reservoirs, which can offer opportunities for sport and recreation. They can also act as a visual amenity and a haven for wildlife.

Open Space Audit – An audit of the open spaces within the District including an assessment of facilities and character.

Out-of-Centre - In retailing terms, a location that is clearly separate from the primary shopping area of a town centre but not necessarily outside the urban area.

Plan-led System - The principle that decisions upon planning applications should be made in accordance with adopted development plans (and DPDs), unless there are other material considerations that may indicate otherwise.

Planning & Compulsory Purchase Act 2004 - The Act updates elements of the 1990 Town & Country Planning Act. The Planning and Compulsory Purchase Act 2004 introduced a statutory system for regional planning; and a system for local planning known as Local Development Frameworks (LDFs). The local planning system has since been subject to government reforms and the details of which were set out in the Localism Act 2011 and the National Planning Policy Framework (NPPF).

Planning Out Crime - The planning and design of street layouts, open space, and buildings so as to reduce the actual likelihood or fear of crime, for example by creating natural surveillance.

Pitch/plot – Area of land on a site/development generally home to one license household. Can be varying sizes and have varying caravan occupancy levels. Often also referred to as a plot, particularly in relation to Travelling Showpeople. There is no agreed definition as to the size of a pitch.

Planning Obligations/S106 Agreements – Contributions secured by the council to help provide or fund infrastructure items or services that will help to make development acceptable in planning terms.

Preferred Options – During formal public consultation on a Development Plan Document (DPD), the LPA will offer preferred option and proposals. The Council will offer those options, which are reasoned to be the most appropriate.

Previously Developed Land (PDL) or ‘Brownfield’ Land - Previously developed land is that which is or was occupied by a permanent structure including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration

has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.

Policies Map – The component of a local plan showing the location of proposals in the plan, on an Ordnance Survey base map.

Public Open Space - Urban space, designated by a Council, where public access may or may not be formally established, but which fulfils or can fulfil a recreational or non-recreational role (for example, amenity, ecological, educational, social or cultural usages).

Renewable Energy – Energy produced from a sustainable source that avoids the depletion of the earth’s finite natural resources, such as oil or gas. Sources in use or in development include energy from the sun, wind, hydropower, ocean energy and biomass.

Rural Diversification - The expansion, enlargement or variation of the range of products or fields of operation of a rural business (branching out from traditional farming activities, for example new income generating enterprise like renewable energy).

Rural Exceptions Policy/Site - A development plan or Development Plan Document may allocate small sites within rural areas solely for affordable housing, which would not otherwise be released for general market housing.

Safeguarded Land – A term to describe land that has been removed from the Green Belt to meet possible longer term development needs, beyond the current plan period.

Sequential approach/sequential test - A planning principle that seeks to identify, allocate or development certain types or locations of land before the consideration of others. For example, Brownfield housing sites before Greenfield sites, or town centre retail sites before out-of-centre sites.

Site Allocations – Sites that are proposed for development to meet the LPAs requirements set out in the Core Strategy. Policies will identify any specific requirements for individual proposals.

Soundness - A term referring to the justification of a Development Plan Document. A DPD is considered “sound” and based upon good evidence unless it can be shown to be unsound.

Spatial Development - Changes in the distribution of activities in space and the linkages between them in terms of the use and development of land.

Spatial Planning - Spatial planning goes beyond traditional land use planning to bring together and integrate policies for the development and use of land with other policies and programmes which influence the nature of places and how they function. That will include policies which can impact on land use, for example by influencing the demands on, or needs

for, development, but which are not capable of being delivered solely or mainly through the granting or refusal of planning permission and which may be implemented by other means.

Spatial Vision - A brief description of how the area will be changed at the end of the plan period (often 10 – 15 years).

Special Area of Conservation – A site designated under the EC Habitats Directive and protected for its significant nature conservation value.

Stakeholders – People who have an interest in the activities and achievements of the Council, including residents, local communities of interest, partners, employees, customers, shareholders, suppliers, opinion leaders, regulators and “hard to reach” groups.

Statement of Community Involvement (SCI) – A Local Development Document (LDD) that sets out the standards which the LPA intends to achieve in relation to involving the community in the preparation, alteration and continuing review of all Local Development Documents (LDDs) and in significant development control decisions, and also how the local planning authority intends to achieve those standards.

Strategic Environmental Assessment (SEA) - A generic term used internationally to describe environmental assessment as applied to policies, plans and programmes. The SEA will form an integral part of the preparation process for all Local Development Documents (LDDs) and will be used to explain the environmental implications of policies and development as part of a Sustainability Appraisal (SA).

Strategic Flood Risk Assessment (SFRA) – Strategic Flood Risk Assessment is a tool used by the Local Planning Authority to assess flood risk for spatial planning, producing development briefs, setting constraints, informing sustainability appraisals, identifying locations of emergency planning measures and requirements for flood risk assessments.

Strategic Housing and Economic Land Availability Assessment (SHELAA) – Strategic Housing and Economic Land Availability Assessments are a key component of the evidence base to support the delivery of sufficient land for housing and employment to meet an identified need. These assessments are required by national policy set out in the National Planning Policy Framework (NPPF).

Submission Stage – The formal passing of the Development Plan Document to the Government for their assessment and examination.

Sustainable Drainage Systems (SUDS) – Measures to increase the permeability of surfaces therefore allowing a slower release of water.

Supplementary Planning Documents (SPDs) – A guidance document that supplements policies and proposals in the Local Plan. It will be subject to public consultation, but will not form part of the Development Plan or be subject to Independent Examination.

Sustainability Appraisal (SA) – The examination of a Local Development Document (LDDs) to ascertain whether its policies and proposals accord with the principles of sustainable development. The Sustainability Appraisal will incorporate a Strategic Environmental Assessment (SEA).

Sustainable Communities – Places where people want to live and work, now and in the future.

Sustainable Community Strategy (SCS) - A strategy prepared by local authorities to help deliver local community aspirations, under the Local Government Act 2000.

Sustainable Development - A widely used definition drawn up by the World Commission on Environment and Development in 1987: "development that meets the needs of the present without compromising the ability of future generations to meet their own needs". The Government has set out four aims for sustainable development in its strategy "A Better Quality of Life, a Strategy for Sustainable Development in the UK". The four aims, to be achieved at the same time, are: social progress which recognises the needs of everyone; effective protection of the environment; the prudent use of natural resources; and maintenance of high and stable levels of economic growth and employment.

Sustainable Travel/Sustainable Transport - Often meaning walking, cycling and public transport (and in some circumstances "car sharing"), which is considered to be less damaging to the environment and which contributes less to traffic congestion than one-person car journeys.

Transit site – Gypsy/Traveller Site intended for short stays. Such sites are usually permanent, but there is a limit on the length of time residents can stay.

Travel Plan (sometimes called a 'green travel' or 'commuter' plan) - A travel plan aims to promote sustainable travel choices (for example cycling) as an alternative to single occupancy car journeys that may impact negatively on the environment, congestion and road safety. Travel Plans can be required when granting planning permission for new developments.

Travelling Showpeople - Commonly referred to as Showmen, these are a group of occupational Travellers who work on travelling shows and fairs across the UK and abroad.

Vitality - In terms of retailing, the capacity of a centre to grow or develop.

Windfall Site - A site not specifically identified in the planning process, but which unexpectedly becomes available for development during the lifetime of a plan. Most "windfalls" are referred to in a housing context.

Written Representations - A procedure by which representations on development plans and DPDs can be dealt with without the need for a full public inquiry or independent examination.

Written Statement - A documentary statement supplementing and explaining policy, forming part of a development plan.



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