

South Staffordshire Council

South Staffordshire Local Plan

Local Plan Review

Issues and Options Consultation Statement

October 2019

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1.0 Introduction

- 1.1 All planning authorities have a strategic plan which provides a framework for the future planning of their area and contains policies for the determination of planning applications. South Staffordshire's current Local Plan is made up of two main documents, the Core Strategy and the Site Allocations Document (SAD). The Core Strategy was formally adopted in December 2012 and the SAD in September 2018.
- 1.2 We have now begun a review of the Core Strategy/SAD and aim to prepare a single Local Plan which will replace these two documents. The new plan will run from 2018 until 2037 and we have begun the process by collecting evidence and undertaking the first of a number of public consultations into the initial issues that the new plan will need to cover. The consultation is called Issues and Options and was held in late 2018.
- 1.3 This Statement describes the public consultation undertaken by the Council in relation to the Local Plan review Issues and Options process. The Statement outlines the consultation methods used by the Council, the local communities and organisations that were consulted and summarises the views of respondents to the key issues raised throughout the Issues and Options consultation. It also highlights some of the key messages that have emerged from the consultation that will inform the preparation of the Council's Spatial Strategy and Preferred Options.
- 1.4 The Issues and Options consultation was carried out to meet the requirements set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. The regulations set out the legal requirements that Local Planning Authorities (LPAs) must comply with in relation to early engagement. This is set out in **Regulation 18 – Preparation of a Local Plan** and requires the Council to:
- Notify specific consultation bodies as well as general consultation bodies, residents and other persons that the LPA considers appropriate of the Local Plan that the LPA proposes to prepare.
 - Invite all those invited to make representations to the LPA to comment on what the Local Plan should contain.
 - Take into account any representations received when preparing the Draft Local Plan.
- 1.5 The Council has an adopted **Statement of Community Involvement**, or SCI, which sets out how we aim to engage with local communities and stakeholders in plan preparation as well as when determining planning applications. The SCI contains a list of the types of organisations, individuals and statutory bodies that are consulted in preparing a plan. The Issues and Options consultation was carried out in accordance with the adopted SCI.

2. Consultation

- 2.1 The Council is committed to involving local communities and stakeholders in the preparation of the Local Plan and sees consultation as an ongoing activity, which feeds the views of residents and consultees into the plan process.
- 2.2 We have a Local Plan Register which is a database of people or organisations that have expressed an interest in the Local Plan, or have made comments to previous Local Plan consultations. Some of the organisations are statutory consultees such as adjoining local authorities, Natural England, highways etc and others include community groups, parish councils and residents. A full list of the types of individual and bodies we consult can be found in the SCI.
- 2.3 Anyone who makes representations to any Local Plan consultation is automatically added to the database. There is also an opportunity for people to register themselves using an online form on our consultation webpage <https://www.sstaffs.gov.uk/planning/local-plans-recent-news.cfm>.

Duty to Co-operate

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

Local Plan review - Issues and Options Consultation

- 2.5 The purpose of the Local Plan review Issues and Options consultation was to look at the issues facing the district and to seek views on potential solutions. The SAD committed us to carrying out an early review of the Local Plan (Policy SAD1) 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.
- 2.6 Consultation on Issues and Options for the Local Plan review was carried out for 8 weeks from Monday 8 October until 5pm on Friday 30 November 2018.

- 2.7 The Issues and Options consultation sought views on whether or not we had identified the right issues facing the district and which of the options presented were the most appropriate for addressing these issues. A variety of options was presented and it was made clear that the options were not mutually exclusive and a mixture of options might be a better way to deal with certain issues.
- 2.8 We published a number of consultation documents which included:
- [Local Plan Review Issues and Options](#)
 - [Local Plan Review Sustainability Appraisal](#)
 - [Local Plan Review Habitat Regulations Assessment](#)
 - [Infrastructure Delivery Plan](#)
 - [Rural Services and Facilities Audit 2018](#)
 - [Step-by-step Guide to Key Issues](#)
- 2.10 The Issues and Options document covered a range of themes including Homes and Communities, Economic Vibrancy, Natural and built Environment and what strategic policies might be needed in the new Local Plan. The Issues and Options document considered potential levels and locations for growth for both housing and employment development. It set out issues, the evidence to date and posed a number of questions to guide responses.
- 2.11 We also published a shorter, step-by-step guide to the Issues and Options intended for non-planning professionals to help local communities understand the process and encourage them to engage and give us their views.
- 2.12 The adopted Core Strategy was developed using a settlement hierarchy approach and we were mindful that the evidence that underpinned the Settlement Study would need to be refreshed to reflect not only changes in services and facilities but also significant changes to national planning policy and guidance. The Rural Services and Facilities Audit 2018 sets out a new settlement hierarchy, with villages being ranged in tiers, from Tier 1 with the greatest access to services and facilities to Tier 5, those villages or hamlets with poorest access to services and facilities.
- 2.13 There were other documents published at the same time as the consultation documents including an Economic Development Needs Assessment (EDNA) 2018; Sustainability Appraisal Scoping Report; Habitats Regulations Assessment; Frequently Asked Questions Sheet; and the Infrastructure Delivery Plan. Whilst we received comments on these documents which have been recorded, they did not form part of the formal consultation process.

Publicity and Procedures

- 2.14 We wrote to everyone on our Local Plan Register, by email or letter, to advise them the consultation was starting and where the documents were available to view. Copies of documents could also be purchased at the Council Offices or at the local exhibitions (see below). The documents were made available online on the

Council's website at www.sstaffs.gov.uk/localplanreview and remain available for information. They were also provided in hard copy at:

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

2.15 We provided formal response forms and comments sheets online and at each of these venues and at the exhibitions. We encouraged people to make representations electronically by email, however many responses were still made in the form of hand written letters, forms or comments sheets. Examples of the response forms and comment sheet can be seen in Appendix 1.

Media

2.16 A public notice was placed in the Express and Star and Chronicle newspapers on Monday 8 October 2018. Information about the consultation was also regularly featured on the Council's Facebook page over the 8 weeks, including a video to promote the drop-in sessions. An article was published in the Council's Review newspaper Edition 71 Autumn 2018 which was delivered to every household in the District. Copies of the public notice and Review Articles can be seen in Appendix 2. We were made aware that the consultation also featured and was discussed in local Facebook groups such as Perton Residents' Page, Wombourne Online, Penkridge Matters, Bilbrook Codsall and Surrounding Areas and Kinver Past and Present.

Exhibitions

2.17 Council officers were available at the Council Offices in Codsall to discuss the Issues and Options documents during normal working hours (8.45am – 5pm, Monday - Friday) for the 8 week consultation period.

2.18 In addition to this, local drop-in sessions were held in Penkridge, Codsall and Wombourne where residents and other interested parties could speak with planning officers about the proposals. The exhibitions were not specific to any one village and people were encouraged to attend any venue that was convenient for them. Posters advertising the exhibitions were sent to parish clerks for them to put up in their local area. The exhibitions were held between 10am until 7pm and details of the dates and venues are given below.

Timetable For Local Plan Review Drop-in Sessions	
Wednesday 7 November 2018	Wombourne Civic Centre
Wednesday 14 November 2018	Council Offices, Codsall
Thursday 15 November 2018	Haling Dene Centre, Penkridge

3. Responses to the Consultations and Key Messages

3.1 There were just fewer than 500 responses to the consultation and comments have been summarised in a schedule of responses. The summary responses can be seen in Appendix 4. Copies of the original full responses can be made available on request.

3.2 Responses have been put into 4 different categories which are:

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

3.3 The table below shows the numbers of responses received for the consultation. It is important to note that some respondents made more than one submission to the consultation. Many respondents also signed petitions in addition to any responses they had made as individuals.

Summary of Responses Received

Issues and Options Consultation	Duly Made	Late/Invalid Responses	Total
Statutory Bodies	42	1	43
Agents/Developers	196	2	198
General Public and other Responses	244	9	253
Petitions	3	0	3
Sub Total	485	12	497

3.4 The Local Plan review Issues and Options consultation covered a number of key themes and these were:

- Level of Growth
- Locations for Growth
- Methodology
- Homes and Communities
- Economic Vibrancy
- Natural and Built Environment
- Strategic Policies and Sites

3.5 In total 84 questions were spread throughout the document to guide responses and focus respondents on the issues facing the district. The majority of respondents did not make comments on all of the individual questions, and the main issues raised were relating to levels and locations for growth and the promotion of sites.

Summary of Key Responses by Theme

Level of Growth

- 3.5 The Council put forward a range of Levels for Growth scenarios (A-E) with the Council's preferred approach being Option C – meeting our own needs, plus up to 4000 dwelling contribution toward the HMA shortfall. There was support from some parish councils and local residents for a lower number (Options A/B), but the majority of stakeholders who responded considered Option C was an appropriate level of growth to be tested. Both the Association of Black Country Authorities (ABCA) and City of Wolverhampton Council considered that the whole 4000 contribution should be allocated specifically towards the Black Country's shortfall.
- 3.6 There was support from planning agents and developers for Option C as a minimum target, however, the majority of comments received expressed the view that a level between Option C and D would be more appropriate. There were concerns regarding how much other Councils might be contributing towards shortfalls and that capacity in South Staffordshire and economic growth should be factored in to any housing target. References were made to the need for an updated SHMA and the greater levels of growth put forward in the GBHMA Strategic Growth Study.
- 3.7 There was support, mainly from the development industry, for the identification of safeguarded land for future housing needs.
- 3.8 In terms of employment growth, local parish councils and residents were of the view that South Staffordshire did not need to accommodate additional employment growth given that South Staffordshire has a slight oversupply of employment land.
- 3.9 Conversely, the majority of stakeholders and the development industry agreed that Option C (Employment) would provide an appropriate level of employment growth, recognising the role South Staffordshire may have to play in meeting the wider shortfall in the FEMA. The impact of a consent at WMI was highlighted, including the potential need for new homes and impact on the local and regional highway network.

Locations for Growth

- 3.10 A new Rural Services and Facilities Audit 2018 provided an update to the settlement hierarchy set out in the Settlement Study. This proposed a new tiered category of settlements, ranging from Tier 1, which had the greatest level of services and facilities (including access to a railway station) to Tier 5, with the fewest services and facilities. There was a high level of objection to the proposed revised settlement hierarchy, some from parish councils and residents who generally thought that settlements should be down scored. The majority of objections and comments were from the development industry who queried the scoring, sustainability assumptions and lack of consideration of how improved infrastructure

might influence development locations. In the main, these objections related to specific sites which were being promoted by developers.

- 3.11 The Council put forward 6 Scoping Options for locations for growth which included growth being focussed on the larger, better connected villages; development on the urban fringe; a new settlement option; and dispersed growth across the district. Although there were some objections to specific options, by far the majority of respondents were in favour of a combination of approaches, and suggested that further investigation should be carried out as part of plan preparation.
- 3.12 There was a high level of objection from residents to Option C (development focussed on the urban fringe). Over half of representations from the general public related to a specific site in the south of the district at Ridgehill Wood where a sustained social media campaign had urged residents to respond to the consultation; this despite the consultation being about broad strategies, not sites.
- 3.13 There was some support, mainly from residents, for Option E which looked at the potential for a new free standing settlement. Other issues raised were about the use of PDL as a priority; minimise Green Belt loss and the impact new development would have on existing infrastructure.
- 3.14 With regard to employment growth, a mixture of options was supported, including support for the existing four free standing employment sites.
- 3.15 In terms of applying a minimum housing density of 35 dwelling per hectare as a policy standard, the majority of respondents (planning agents and developers) objected to a blanket approach of 35 dws/ha. Views were that whilst there was support for the efficient use of land, flexibility was paramount and that development should be considered on a site by site basis to allow for local characteristics and good design.

Methodology

- 3.16 There was broad support from the development industry for the key factors which should inform the spatial housing distribution going forward. There were comments on the level of detail of some evidence, such as Green Belt, and that factors should be judged at a site specific level, also taking account of how new development might provide necessary services and facilities.

Homes and Communities

- 3.17 There was broad support for an approach to continue a variety of house types, guided by the SHMA and which would allow some flexibility on the basis that it was supported by up to date evidence. Parish councils and residents noted that affordability and need for smaller, specialist homes for elderly persons (such as bungalows) was important.

- 3.18 With regard to affordable housing percentage requirements, almost all of the respondents were from the development industry. There was support for a district wide affordable housing requirement for sites of 10 units or more, subject to up to date evidence and viability testing. In terms of tenure split, again views were that evidence (SHMA) and viability should be considered.
- 3.19 In general, regarding housing policy options, space about dwellings, design and parking, again the focus was on up to date evidence, flexibility and adherence to national rather than local standards.
- 3.20 There was little support from the development industry for a blanket threshold policy for the provision of new schools. Views were that viability, off site provision, higher levels of development or extension of current facility should take precedence.

Economic Vibrancy

- 3.21 There were few comments in response to the Economic Vibrancy section, with support for a range of use classes on employment sites, the review of redundant employment sites for alternative uses and views split on whether an SPD would be a useful addition. However, the majority of respondents to a policy approach which considered provision of an Employment and Skills plan (ESP), objected to the principle as being too onerous and unnecessary.
- 3.22 Support was split between options A and B for rural employment and tourism. Parish councils and stakeholders stated that protection of the Green Belt was important, whilst limited business growth which did not adversely affect the local area should be considered. The development industry favoured option B which allows for the provision or expansion of employment growth in rural areas where this can be justified.
- 3.23 Wolverhampton Halfpenny Green Airport – the majority of respondents supported the proposal to maintain the existing approach and there was resistance to the development of the airport for new housing.
- 3.24 The majority of respondents, particularly the development industry, favoured a continuation of using section 106 payments to fund infrastructure. There was support from some stakeholders to pursue CIL subject to further involvement in setting the 123 list.
- 3.25 There was general support for sustainable transport solutions and promotion of public transport wherever possible. This included support for the Brinsford Park and Ride proposal and increased connectivity between villages and across the district. Highways England and County Highways supported ongoing engagement to enable the identification of mitigation measures required and impact on the road network as the plan progresses.

Natural and Built Environment

- 3.26 There was strong support from stakeholders and residents for the continued protection of Green Belt and clarification on exceptions to policy, including through a revised SPD. The development industry was split between following a similar approach, or with more of a reliance on NPPF policy. Views were that PDL land or sites well served by public transport should be given preference. Safeguarded land and more clarity regarding appropriate development at Wolverhampton Halfpenny Green Airport were identified as being necessary.
- 3.27 With regard to compensatory measures to offset loss of Green Belt land to development there were a small number of objections to this approach, stating that Green Belt should be protected and could not be compensated. Stakeholders and the development industry agreed that offsetting was acceptable through a planned strategy.
- 3.28 Respondents were split between the 3 options for a future Open Countryside policy, but it was clear that the quality of the landscapes and a flexible approach to development was key.
- 3.29 Stakeholders, including Natural England agreed that option B, which suggested a more prescriptive approach for landscape led development, including master planning of large sites, was appropriate. Developers and planning agents were split between the two options with support for a finer grained approach to landscape assessment being suggested.
- 3.30 There was general support across stakeholders, residents and the development industry to continue to protect designated sites and with a positive approach for the provision and enhancement of green networks. There was also strong support for a net biodiversity gain approach.
- 3.31 Key stakeholders, such as AONB Partnership and SAC Partnership, along with other statutory bodies were in favour of a continued approach which would serve to protect the SAC and mitigate development pressures. Up to date evidence to support a new policy was stated to be required and recognition that in order to keep Green Belt release to a minimum some development in areas closer to the SAC might be necessary. Parish councils and residents felt that Cannock Chase, the SAC and the AONB should be given a high level of protection.
- 3.32 The majority of comments relating to the provision and maintenance of open space were neither objections nor support, but a general commentary on the importance of green spaces and accessibility to them, and to a review of the standards. There was also a request and residents' support for the designation of an area of land in Kinver as a Local Green Space.

Strategic Policies and Sites

3.33 There was support for the following strategic policies:

Wolverhampton Halfpenny Green Airport
Health and Wellbeing
AONB/SAC
Exceptions Sites
Flood Risk
Historic Environment

3.34 The development industry respondents were strongly of the view that strategic policies for space about dwellings and internal space standards were not necessary and should be judged on a site by site basis. There was a call for a strategic policy for WMI if it were to be approved in 2020.

3.35 There were mixed responses to the setting of a threshold to define a strategic site ranging from 50 dwellings at the lower end of the scale, to 500 dwellings or more.

4. Responses to Supporting Documents

Sustainability Appraisal (SA)

4.1 Comments received were in relation to the impact of climate change; taking account of revised guidance and evidence as the Plan progresses; reliance on motor vehicles and alternative wording in relation to the historic environment from Staffordshire County Council.

Habitats Regulations Assessment (HRA)

4.2 Cannock Chase SAC Partnership, Lichfield and Hatherton Canals Restoration Trust and Stafford Borough Council noted issues that needed to be addressed in future HRA work. Natural England directed the Council to recent legal cases that would be relevant to cross boundary working.

Infrastructure Delivery Plan (IDP)

4.3 One resident noted that infrastructure should be put in place in advance of new development. Inland Waterways Association and Lichfield and Hatherton Canals Restoration Trust clarified timescales and welcomed the inclusion of the Hatherton Canal in the Local plan.

Landscape Sensitivity Study

4.4 One site specific comment relating to a site in Codsall.

5. Summary

- 5.1 The Council undertook wide ranging public consultation with stakeholders, landowners, developers, statutory bodies and local communities in line with the requirements set out in the Town and Country Planning (Local Planning) (England) Regulations 2012, our adopted Statement of Community Involvement (SCI) and under the Duty to Co-operate.
- 5.2 The Issues and Options consultation was held for 8 weeks from Monday 8 October until 5pm on Friday 30 November 2018.
- 5.3 The consultations were widely publicised through a variety of means including the Council's website, South Staffordshire Council Facebook page, posters, public drop-in sessions, the Council's Review newspaper, and parish councils. Officers were available throughout the consultations to answer queries and discuss the proposals in person, by telephone and through email.
- 5.4 The responses to the consultations have been read and recorded and the information in them has been used to inform the next stage of consultation which will be Spatial Housing Strategy and Infrastructure Delivery options.