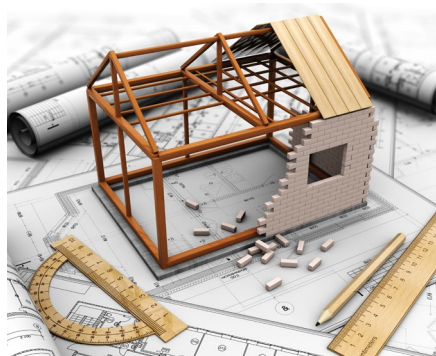
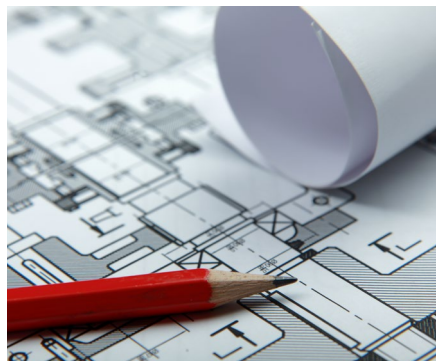




South Staffordshire Council

# Local Plan Spatial Housing Strategy and Infrastructure Delivery

October 2019



Further information can be found at  
[www.sstaffs.gov.uk](http://www.sstaffs.gov.uk)



**A New Development Strategy for South Staffordshire 2018-2037**

**The Local Plan Review**

# **Spatial Housing Strategy & Infrastructure Delivery**

**October 2019**



## 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.

This is the second stage of our review of the Local Plan for South Staffordshire. Its focus is on housing growth in the district, looking at broad locations for growth and the infrastructure benefits that will be delivered as a consequence. Sites will come later, once our overall strategy has been agreed. We will be looking in more detail at our employment growth options, and at meeting the needs of our Gypsy and Traveller Community at the next stage of consultation in summer 2020.

We know that providing more homes is not only important to meet national drivers, but to provide for the needs of our own residents here in South Staffordshire. We also need to look to see if we can help our neighbouring authorities in the Greater Birmingham Housing Market Area by providing additional housing under our legal Duty to Cooperate.

This consultation sets out a number of options for you to consider, and we believe that an infrastructure led approach would be the most robust to achieve our aims. We do not underestimate the challenge that will come with meeting national requirements and providing new homes for our local communities, whilst protecting our Green Belt wherever possible.

Your views can help us shape the future of South Staffordshire and gives us the opportunity 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.

Please let us have your views by responding to the consultation.

**Councillor Brian Cox**  
Cabinet Member for Planning and Business Enterprise





## Contents

Chapter		Page
1.	Introduction	1
2.	The Local Plan Review: Progress to date	6
3.	Evidence used to inform Spatial Housing Options	9
4.	Spatial Housing Options under consideration	12
	<b>Spatial Housing Options A-G</b>	17
	Housing Option A	18
	Housing Option B	22
	Housing Option C	26
	Housing Option D	30
	Housing Option E	34
	Housing Option F	38
	Housing Option G – Preferred Approach	42
5.	Conclusions on the Spatial Housing Options	45
<b>Appendices</b>		
	Appendix 1 - Full List of Questions	
	Appendix 2 - Glossary	
	Appendix 3 - Options for Growth & Rationale	
	Appendix 4 - Indicative Growth Tables	
	Appendix 5 - Constraints	
	Appendix 6 - Site Selection	
<b>Tables</b>		
	Table 1: Stages of Plan-making	3
	Table 2: Housing Options Summary	17
<b>Figures</b>		
	Figure 1: Spatial Strategy Baseline	14
	Figure 2: GB High Harm – North of Black Country	48
	Figure 3: GB High Harm – West of Black Country	49



# 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:
- **Part 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.
  - **Part 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 was originally intended to run until 2028).
- 1.3 The planning system has seen seismic changes since the Core Strategy was adopted in 2012, with significant amendments to national planning policy and the requirements of Local Plans. Therefore an early review of the Local Plan is essential to respond to these Government requirements. The Council must 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. In particular, the new Local Plan will need to respond recent updates to the National Planning Policy Framework (NPPF) and national planning policy guidance (PPG). These include 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 needs within their own areas.

## 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 in the plan. 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 the new 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, providing affordable housing, protecting and providing open spaces, design quality, protecting and enhancing the natural and historic environment and mitigating and adapting to the changing climate. 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. Following on from the Issues and Options consultation last year, this new consultation looks at options on how housing development might be distributed across the district. This is based on the evidence we have gathered to date, responses from the Issues and Options consultation, land that we know is available and taking on board the requirements of national planning policy and guidance.
- 1.9 The changes that take place may affect you in a variety of ways. You may be able to see new homes 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"> <li>• Identification of main planning issues for the district, including SA Scoping Report</li> <li>• Development of Strategy Options</li> <li>• Call for Sites</li> </ul>	2016-present

	<ul style="list-style-type: none"> <li>• SHMA</li> </ul>	
Issues and Options	<ul style="list-style-type: none"> <li>• Public consultation on whether the correct issues have been identified and potential strategies and policies to meet different development needs</li> <li>• Additional Call for Sites</li> <li>• Initial SA Report</li> </ul>	October 2018
Spatial Housing Strategy & Infrastructure Delivery Options	<p><b>WHERE WE ARE NOW</b></p> <ul style="list-style-type: none"> <li>• Public consultation on a strategic approach to new housing development, including broad locations but not specific sites.</li> <li>• SA of spatial growth options</li> </ul>	October 2019
Preferred Options Plan	<ul style="list-style-type: none"> <li>• Public consultation on the Council's proposed draft Plan.</li> <li>• Draft SA Report</li> </ul>	Summer 2020
Publication Plan	<ul style="list-style-type: none"> <li>• Sets out the final Local Plan for submission to the Secretary of State (SoS)/Government</li> <li>• Public consultation on legal compliance and 'soundness'</li> <li>• Final draft SA Report</li> </ul>	Winter 2020/2021
Submission and Examination	<ul style="list-style-type: none"> <li>• Local Plan submitted to Government (Planning Inspectorate) with all the comments received during the Publication Plan consultation</li> <li>• Independent Examination carried out in public by a Planning Inspector</li> <li>• Final SA Report</li> </ul>	Autumn 2021
Adoption	<ul style="list-style-type: none"> <li>• Council formally adopts Local Plan</li> <li>• SA Adoption Statement</li> </ul>	Summer 2022
Monitoring and Review	<ul style="list-style-type: none"> <li>• Each year, identified targets and planning applications are monitored to assess delivery of the Local Plan</li> </ul>	Ongoing

**Table 1: Stages of Plan-making**

## Issues and Options Consultation 2018

- 1.12 The first stage of the Local Plan review process was a public consultation held for 8 weeks in October and November 2018. The Council received around 500 responses to the consultation and the comments received have helped inform this Spatial Housing Strategy and Infrastructure Delivery document. You can see more about the consultation responses and how the consultation was carried out in our Consultation Statement.

## What are the Spatial Housing Strategy & Infrastructure Delivery Options?

- 1.13 This Spatial Housing Strategy and Infrastructure Delivery consultation is the second stage of the Local Plan review. Following on from the Issues and Options consultation, we have used the up-to-date evidence we have gathered and the responses to the Issues and Options consultation to formulate a number of options that show strategic, broad locations for housing growth which recognise infrastructure requirements. We are asking for your views on

the strategic housing options which will enable us to prepare a Preferred Options Plan for consultation in 2020. **This consultation focuses on housing growth; however, we will be addressing employment growth and the needs of Gypsies and Travellers in our Preferred Options Plan in 2020.** This is because the evidence gathering to support employment and Gypsy and Traveller proposals is ongoing.

- 1.14 At this stage no sites have been selected and the consultation is looking at broad options. Site selection, site assessment and methodology will form part of the Preferred Options Local Plan. You can see more about how we propose to approach site selection in Appendix 6.

## Making comments

- 1.15 Your comments are encouraged and this paper sets out a series of questions to guide responses, such as the example question set out below. These are spread through the document in each section.

### Example Question X:

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

- 1.16 A Glossary (Appendix 2) is included at the back of the document to provide definitions of technical terms. A Frequently Asked Questions document (FAQs) is also available on the Council's website.
- 1.17 Following the close of the Spatial Housing Strategy and Infrastructure Delivery consultation, all responses will be considered and summarised to inform the preparation of the Preferred Options Plan which we will consult on in summer 2020. Preferred Options will include specific development sites and policies to meet our housing targets in the final preferred strategy.

## How to respond and next steps

- 1.18 We want as many people as possible to be involved in the preparation of the new Local Plan. The Spatial Housing Strategy and Infrastructure Delivery consultation will take place from Thursday 17 October until 5pm Thursday 12 December 2019. All comments must be made in writing by the consultation deadline in order for us to take them into account. We strongly encourage responses to be made electronically; however, you can submit your comments in any of the following ways:

By email: [localplanreview@sstaffs.gov.uk](mailto:localplanreview@sstaffs.gov.uk)

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

## 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. The Local Plan Review: Progress to date

- 2.1 South Staffordshire needs to undertake an early review of its Local Plan, to ensure it can meet the increased housing and employment needs of the district and to see whether it can meet some of the unmet needs from other areas. In October 2018, the Council consulted on its Local Plan review – Issues and Options document, which set out policy options for the Council to consider in the Local Plan review. We sought views on the Council’s preferred level of housing growth, which at that time was to plan for 9,130 dwellings between 2018 and 2037. This figure reflected both the district’s own housing needs and a contribution of up to 4,000 dwellings to the unmet needs of the Greater Birmingham Housing Market Area.
- 2.2 A number of points were raised by local residents, developers and statutory bodies to the options for both the amount and location of housing growth in the district. Having considered all of these responses, **the Council remains of the view that planning for its own housing needs, plus a contribution of up to 4,000 dwellings towards unmet needs in the wider housing market area is the most appropriate housing target for the Local Plan review** at this point in time. This is a proactive approach taken by the Council to address the unmet needs of the housing market area in a timely manner. **However, if there is evidence that the extent of the housing shortfall across the housing market area has significantly reduced prior to the Local Plan review’s submission, the Council will reduce its contribution to the unmet needs of other authorities proportionately.**

### The preferred housing target for the Local Plan review

- 2.3 In 2018, the Government introduced a standard methodology for all local authorities to use in calculating their local housing needs. Since the 2018 Issues and Options consultation, the district’s own local housing need has changed when applying this standard method. As of 1 April 2019 the Council’s housing need is 254 dwellings per annum for the remainder of the plan period (i.e. from 1 April 2019 onwards). There were also 273 dwellings completed between 1 April 2018 and 31 March 2019. The Local Plan review will cover the plan period of 1 April 2018 to 31 March 2037, meaning that the plan target needs to reflect housing growth across this period. Therefore, taking the district’s updated housing needs figure 2019-2037 and the completions which have already occurred in 2018, the district’s own housing need is now 4,845 dwellings between 2018 and 2037.
- 2.4 Taking together both the district’s own housing needs and a contribution towards the Greater Birmingham Housing Market Area, the Local Plan review needs to plan for a target of **8,845 dwellings between 2018 and 2037** to deliver the preferred approach set out in the 2018 Issues and Options document. However, this target may reduce further if there is evidence that the extent of the housing shortfall across the housing market area has significantly reduced prior to the Local Plan review’s submission.
- 2.5 The 2018 Issues and Options consultation also asked for views on the following spatial approaches to accommodating housing growth in the district:

• <b>Scoping Option A:</b>	Rural housing growth focused on the district’s larger and better connected villages
• <b>Scoping Option B:</b>	Rural Housing growth dispersed across all settlements with a basic level of service provision within the district
• <b>Scoping Option C:</b>	Small-scale urban extensions on the fringe of neighbouring urban

	areas
• <b>Scoping Option D:</b>	Larger urban extensions on the fringe of neighbouring urban areas
• <b>Scoping Option E:</b>	New freestanding settlements away from the existing villages/urban areas
• <b>Scoping Option F:</b>	Introduce minimum housing densities on all housing sites and intensify development within the existing village development boundaries

2.6 It is clear from the consultation responses received to the Issues and Options consultation that the level of growth we are planning for is unlikely to be achieved using any one spatial approach consulted on at the Issues and Options Stage in isolation (see Scoping Options A-F above). Therefore a spatial distribution that involves elements of some or all of the above approaches will likely be required to meet the housing needed in the district up to 2037.

### The purpose of this consultation

2.7 We are consulting on how the updated 8,845 dwelling housing target could be best planned for and we are seeking views on a variety of Spatial Housing Options to distributing housing growth across the district. Each of these options considers how housing growth could be split between different settlements and urban edge locations, but **does not** seek to identify specific sites to deliver this level of growth at this stage. The Council is doing this to frame and progress discussions with infrastructure providers and other stakeholders, whilst ensuring there is, wherever possible, a genuine choice of sites to meet an appropriate strategy for future growth. Equally, the purpose of this consultation is simply to set the context for site selection rather than to determine the exact amount of dwellings to be found in each broad location. Therefore, the distribution of housing growth proposed in this consultation may alter to reflect specific site opportunities once these are assessed in more detail.

2.8 Each Spatial Option presented in this document sets out an approach to apportioning the 8,845 dwelling housing target across broad locations within the district. Indicative housing growth percentages and corresponding numbers of new homes are set out for each option. These are set out in detail in Appendix 4. **At this stage, any levels of growth or housing numbers are purely indicative and are included solely to give infrastructure providers and local communities a clearer idea of what each option may deliver on the ground under the different options.** This is because the final numbers of new homes allocated to any location will inevitably change to reflect changes in our housing supply and detailed site assessment as the Local Plan review process progresses.

2.9 We are seeking views on these options to allow for more detailed consideration of potential sites and infrastructure requirements which will meet the preferred Spatial Housing Strategy. This will be reflected in the Preferred Options Plan consultation (Summer 2020).

### How the Spatial Housing Options have been devised

2.10 Each of the Spatial Housing Options involves a combination of the Scoping Options consulted on in the Issues and Options consultation in 2018. They represent a range of options to consider for a spatial strategy, which are not completely independent of each other: Each option is broadly reflective of one of the following strategic themes; however some elements reoccur in more than one option. These are:

- Maximise Open Countryside release
- Prioritising Green Belt land release in areas of lesser Green Belt harm
- Carry forward existing Core Strategy strategic approach to distribution
- Maximising sites in areas identified in the GBHMA Strategic Growth Study
- Addressing local affordability issues and settlements with the greatest needs
- Giving first consideration to Green Belt land which is previously developed or well-served by public transport
- Infrastructure-led development with a garden village area of search beyond the plan period

2.11 Further details about each of the Spatial Housing Options in this consultation are given in Section 4.

2.12 Tables setting out what each Spatial Option might mean in terms of potential levels of growth are set out in Appendix 4. Please note that the percentages and dwelling numbers specified in these tables **are purely indicative at this stage**. The dwelling numbers included at this stage will help to give local communities, stakeholders and infrastructure providers an indication of how dwellings *could* be split between different areas of the district under the different options, indicating a potential direction of travel for the allocation of specific development sites. However, these figures could still change following consultation, the site selection stage and a detailed examination of the constraints and capacities of specific site options in different areas.

## 3. Evidence used to inform Spatial Housing Options

- 3.1 In preparing a range of Spatial Housing Options, there will be a number of factors which will influence where the Council will focus housing growth in the Local Plan review. These include a variety of evidence base documents and assessments, as set out below. Please note that Spatial Housing Options have been primarily led by the strategic approach they are seeking to achieve (e.g. addressing local affordability issues, giving first consideration to land well-served by public transport etc.), and have had regard to the factors below where relevant.

### National Planning Policy and Guidance

- 3.2 Where relevant, the policies of the National Planning Policy Framework 2019 (the NPPF) have informed the preparation of each Spatial Option. In particular, regard has been had to:
- prioritising the release of Green Belt which is previously developed or well-served by public transport (para 138)
  - considering the implications for sustainable development for channelling development past the Green Belt (para 138)
  - supporting housing developments that reflect local needs (para 77)
  - locating housing where it will enhance or maintain the vitality of rural communities, allowing villages to grow and thrive where this will support local services (para 78)
  - focusing significant development on locations which are or can be made sustainable through limiting the need to travel and offering a genuine choice of transport modes, whilst recognising that sustainable transport solutions will vary between urban and rural areas (para 103)
  - directing growth towards areas with the least environmental or amenity value (para 171)
  - giving great weight to the conservation and enhancement of Areas of Outstanding Natural Beauty (para 172)

### The South Staffordshire Green Belt Study 2019

- 3.3 This work has assessed the harm that would result to the Green Belt if land were to be released in Green Belt locations adjacent to the Black Country urban area, or in the rural area of South Staffordshire. The Council has considered this work when preparing each Spatial Option, to indicate the likely effects that would result to the Green Belt if a given strategy was pursued.

### The Sustainability Appraisal of the South Staffordshire Local Plan review

- 3.4 This work assesses the sustainability impacts that would likely result from delivering housing growth in line with the higher level Scoping Options A-F of the previous Issues and Options consultation (see paragraph 2.5 above).
- 3.5 Each of the Spatial Housing Options contained in this consultation are combinations of the Scoping Options set out in the previous Issues and Options document. The outcomes of the Sustainability Appraisal have helped us to determine how housing growth should be distributed across the district in each of the Spatial Housing Options.



### Environmental Constraints

- 3.6 The Council has considered high level constraints (e.g. Flood Zone 3, natural/historic environment designations etc) which may constrain the level of growth in a broad location. Examples include where a settlement is heavily constrained by an Area of Outstanding Natural Beauty or has a greater historic character due to being largely covered by a Conservation Area; it may be appropriate to consider a lesser amount of growth in some locations to conserve these assets.

### The availability of sites

- 3.7 To ensure any Spatial Option is deliverable and has a genuine choice of sites to meet a level of housing growth allocated to a broad location, we have considered sites in the Strategic Housing and Employment Land Availability Assessment (SHELAA) 2018 (where compatible with the strategic approach pursued in the relevant Spatial Option).

### The Greater Birmingham Housing Market Area – Strategic Growth Study 2018

- 3.8 Four recommended strategic locations for growth in South Staffordshire were set out within this study, which was undertaken on a comprehensive basis across all fourteen local authorities in the housing market area. When preparing Spatial Housing Options, regard was had to the recommendations of the study as far as these could be achieved within a specific strategic approach.

### Known infrastructure opportunities and needs

- 3.9 Where an infrastructure opportunity or deficit is already known within a broad location, consideration has been given as to how additional housing growth could help to meet this need when apportioning housing growth. These are set out in the Council's Infrastructure Delivery Plan, which is being updated alongside each stage of the plan's preparation. This consideration is most relevant to the 'Infrastructure-led' approach set out in Spatial Option G.

### Rural Services and Facilities Audit 2019

- 3.10 This piece of work groups the district's rural settlements by their relative level of access to services and facilities, creating a new settlement hierarchy of Tier 1-5 settlements (with Tier 5 settlements being the least sustainable in these terms). This audit was included in the Issues and Options consultation in October 2018 and has been updated to reflect consultation responses where appropriate. Therefore, the Spatial Options have used the findings of this work when allocating levels of growth between different Tiers in the settlement hierarchy.

### Existing housing supply as at 1 April 2019

- 3.11 So that each Spatial Option has full regard to existing commitments in supply at the start of the plan period, we have factored in the existing commitments on both allocated and permitted sites within the district as of 1 April 2019 for each Spatial Option. Furthermore, as Green Belt release is required to meet the preferred level of housing growth in the district, **all Spatial Options assume that housing will be delivered on all existing safeguarded land allocations made through the Site Allocations Document (SAD) 2018**. These are proposed for release at an average density of 35 dwellings per net developable hectare, to ensure that further Green Belt release over and above these amounts is only required where absolutely

necessary. Taken together with existing planning permissions and other allocations, this gives a total baseline supply of approximately 3,861 dwellings across the district as of 1 April 2019, as set out in Appendix 4.

### Local affordability data

- 3.12 To recognise the specific housing supply and affordability issues experienced in certain areas of the district's rural area, local affordability ratios (i.e. the ratio of house prices to local incomes) have been examined for each of the wards in South Staffordshire. This data is set out in Appendix 5. This analysis of local affordability provides evidence as to where housing may be best directed so that residents of existing rural communities are able to access a home they can afford and continue to live in their local communities.

**Section 5 sets out how each of the above issues influenced the preparation of individual Spatial Housing Options in more detail.**

#### Question 1:

**Do you agree that the evidence base used to inform Spatial Housing Options is robust and proportionate? If not, what else should we consider?**

## 4. The Spatial Housing Options under consideration

- 4.1 This section sets out 7 Spatial Housing Options being considered by the Council as reasonable alternatives for the distribution of new housing growth in the Local Plan review. Each of these options represents a different approach to housing development in the district, reflecting a variety of strategic themes. The following section shows how housing growth would be distributed in line with each of these 7 Spatial Housing Options. These are presented as a percentage of the Council's preferred housing target, along with indicative numbers of homes that could be delivered. These are set out in full in Appendix 4.
- 4.2 At this stage, any levels of growth or housing numbers are purely indicative and are included solely to give infrastructure providers and local communities a clearer idea of what each option may deliver on the ground. This is because the final numbers of new homes allocated to any location will inevitably change to reflect changes in our housing supply and detailed site assessment as the Local Plan review process progresses.
- 4.3 Each option is accompanied by a summary of some of the key advantages and disadvantages of taking each approach. This is based on a high level analysis of the planning merits of each option, having regard to factors such as:
- natural and historic environmental constraints and designations
  - the Council's 2019 Green Belt Study
  - the GBHMA Strategic Growth Study recommendations
  - local affordability data, population demographics and unmet needs arising from other local authorities
  - areas of the district with greater levels of access to employment
  - the Rural Services and Facilities Audit 2019
  - the Sustainability Appraisal of the 2018 Issues and Options consultation
  - local infrastructure opportunities that may be delivered by a certain level of growth, as set out in the Infrastructure Delivery Plan 2019
  - the need to deliver a range of site sizes to meet national policy requirements
  - potential availability/deliverability of land options
  - the need to give first consideration to areas well served by public transport and previously developed land when releasing Green Belt
  - whether an option requires Green Belt release
- 4.4 These positives and negatives are not a detailed scoring of each option, but are intended to offer a high level summary of the key merits of each approach. Where relevant, summary information relating to the factors above is presented in Appendix 5.
- 4.5 The purpose of identifying the spatial distribution for future housing growth is to frame and progress discussions with infrastructure providers and other statutory bodies, and to inform local communities of the options of growth, whilst ensuring there is, wherever possible, a genuine choice of sites to meet housing growth. Because the sites to meet the strategy are not being identified at this stage, there may be some further changes to the distribution of housing growth following consultation and further evidence gathering on the capacity of sites.

## Common factors shared by all Spatial Housing Options

- 4.6 Whilst each Spatial Housing Option is different, some factors are shared by all Spatial Options. Firstly, all Spatial Options assume that housing supply after 1 April 2018 (the start of the plan period) will contribute to the level of development proposed in each broad location. To determine the baseline supply likely to come forward within the plan period, this consultation has regard to the most up-to-date land supply position in the district as of 1 April 2019. Taken together, all existing sources of current potential housing supply (i.e. permissions, completions and current allocations) total a contribution of approximately 2,217 dwellings which will be delivered in the district between 2018 and 2037 (i.e. the proposed plan period).
- 4.7 Additionally, all Spatial Options propose to release the existing safeguarded land allocations set out in Policy SAD3 of the Site Allocations Document 2018 at an *average* density of 35 dwellings per hectare across the district. This recognises the recommendations of the Greater Birmingham Housing Market Area study, which required a density of 35 dwellings per hectare to be achieved on existing non-Green Belt housing supply options in order to minimise the extent of Green Belt release required elsewhere. In total, releasing the safeguarded land allocations in this manner would, as a minimum, deliver an additional 1,651 dwellings during the proposed plan period.
- 4.8 Taking all of the above together, this means that **South Staffordshire can deliver a minimum of 3,861 dwellings during the plan period without any further release of Open Countryside and Green Belt land**. This is set out in detail in Appendix 4, but the distribution of growth this implies across the district is summarised in Figure 1.
- 4.9 Aside from sharing the same baseline housing supply, there are a number of other factors in common in most Spatial Options. For example, it is clear from Spatial Option A that the updated housing target of 8,845 dwellings cannot be met solely by releasing all potential sites in the Open Countryside and that even if it could, it would be unlikely to represent a sustainable distribution of development and would face significant deliverability issues. Therefore, it is likely that if the 8,845 dwellings plan target is to be met, it will require further Green Belt release within the district. The maps and tables in paragraph 5.3 set out in more detail the circumstances that support the need to release Green Belt in the district.
- 4.10 Almost all Spatial Options (with the exception of Spatial Housing Option A) involve the release of Green Belt land adjacent to the urban area of the Black Country. This recognises that all options are based on a strategy that seeks to make a contribution of up to 4,000 dwellings to the unmet needs of the Greater Birmingham Housing Market Area (GBHMA) and that both small and large urban extension options performed particularly well in the Sustainability Appraisal of the Issues and Options consultation<sup>1</sup>.
- 4.11 Most Spatial Options involve a degree of growth in the district's larger and more sustainable rural settlements, recognising the findings of the Rural Services and Facilities Audit 2019, National Planning Policy Framework (NPPF) requirements regarding sustainable transport, the need to prioritise Green Belt release in locations well-served by public transport and the support for this approach in the Sustainability Appraisal of the Issues and Options consultation<sup>2</sup>.

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<sup>1</sup> Sections 3.17 and 3.18 of the Sustainability Appraisal of the South Staffordshire Local Plan Review September 2018

<sup>2</sup> Section 3.15 of the Sustainability Appraisal of the South Staffordshire Local Plan Review September 2018

### Spatial Strategy: Baseline

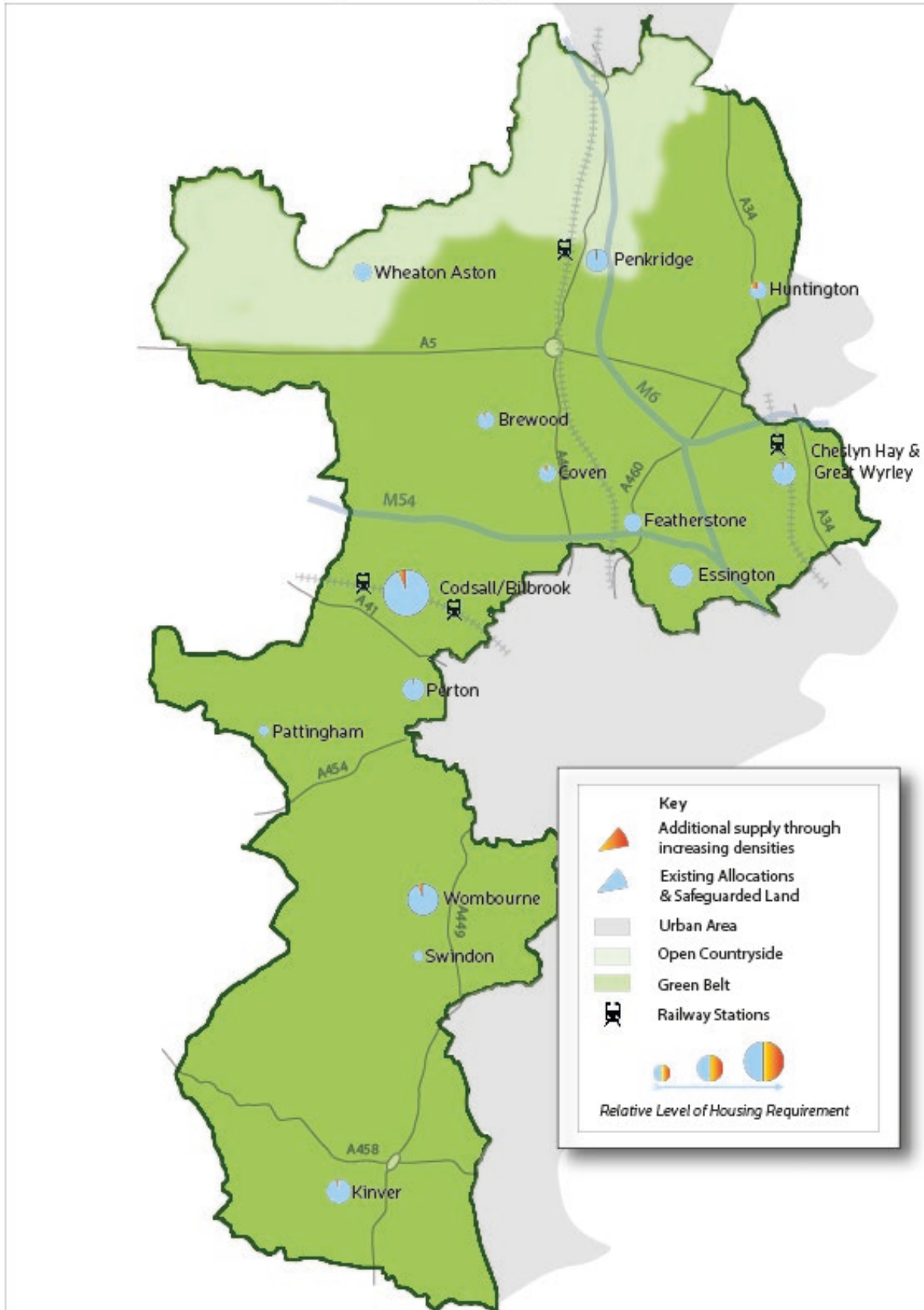


Figure 1

- 4.12 Finally, there are some Spatial Housing Options which consider the possibility of providing a new settlement through the Local Plan review. The GBHMA Strategic Growth Study undertook a high level analysis of potential locations for new settlements within the district, as part of its examination of the potential for new large-scale strategic sites within the GBHMA. To this end, the study identified two areas of search for a new settlement of 10,000 dwellings or more within South Staffordshire<sup>3</sup>:
- Around Dunston
  - Between Wolverhampton and Penkridge
- 4.13 Part of the rationale for identifying locations such as these is that they are adjacent to the strategic road network and a rail corridor<sup>4</sup>. This reflects national policy requirements, which (amongst other matters) state that new settlements should consider opportunities presented by existing or planned infrastructure and ensure that their site and location will allow sufficient access to employment and services in larger towns to which there is good access.
- 4.14 Therefore, given the requirements of national policy and the areas of search identified in the GBHMA Strategic Growth Study, the Council is only giving further consideration to accommodating growth in potential new settlement options (i.e a ‘garden village’) within the A449 corridor. This recognises the presence of a significant transport corridor in this broad location and the fact that both areas of search considered in the GBHMA Strategic Growth Study were within this area.
- 4.15 The rationale behind the distribution proposed in each Spatial Option is set out in more detail in paragraph 4.16.

**Question 2:**

**Do you agree that taking account of housing land supply from the start of the new plan period (1 April 2018) is the correct approach?**

**Question 3:**

**Do you agree that all Safeguarded Land identified in the SAD should be released as a priority and should be delivered at an average density of 35 dwellings per hectare?**

**Question 4:**

**Are there any other options we should consider?**

<sup>3</sup> Table 5 of the GBHMA Strategic Growth Study

<sup>4</sup> Paragraph 1.39 of the GBHMA Strategic Growth Study

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## The Spatial Housing Options A-G

4.16 The format for each of the Spatial Housing Options A-G is set out as follows:

- Table with explanatory text, summary of option distribution and table showing spread of housing development by location.
- Map showing proposed distribution
- Table of advantages and disadvantages of each option.

More detail on the distribution and rationale for each option can be found in appendices 3 and 4.

### Comparative summary of the options

Housing Option A	<p><b>Maximising Open Countryside release</b></p> <ul style="list-style-type: none"> <li>• Significant new allocations in Penkridge and Wheaton Aston</li> <li>• Meets South Staffordshire’s housing needs</li> <li>• Doesn’t deliver proposed contribution to wider unmet housing needs</li> </ul>
Housing Option B	<p><b>Prioritising Green Belt land release in areas of lesser Green Belt harm</b></p> <p>Housing focussed in:</p> <ul style="list-style-type: none"> <li>• Tier 1 to 4 villages (75%)</li> <li>• Urban extensions and wider rural area (25%)</li> </ul>
Housing Option C	<p><b>Carry forward existing Core Strategy strategic approach to distribution</b></p> <p>Housing focused in:</p> <ul style="list-style-type: none"> <li>• Tier 1 and 2 Villages (90%)</li> <li>• Tier 3 Villages (10%)</li> </ul>
Housing Option D	<p><b>Maximising sites in areas identified in the GBHMA Strategic Growth Study</b></p> <p>Housing focused in:</p> <ul style="list-style-type: none"> <li>• Tier 1 to 4 Villages (70%)</li> <li>• Urban extensions and wider rural area (30%)</li> </ul>
Housing Option E	<p><b>Addressing local affordability issues and settlements with the greatest needs</b></p> <p>Housing focused in:</p> <ul style="list-style-type: none"> <li>• Tier 1 -4 Villages (60%)</li> <li>• Urban extensions and wider rural area (40%)</li> </ul>
Housing Option F	<p><b>Giving first consideration to Green Belt land which is previously developed or well-served by public transport</b></p> <p>Housing focused in:</p> <ul style="list-style-type: none"> <li>• Tier 1 to 4 villages (60%)</li> <li>• Urban extensions and wider rural area (40%)</li> </ul>
Housing Option G	<p><b>Infrastructure-led development with a garden village area of search beyond the plan period</b></p> <p>Housing focused in:</p> <ul style="list-style-type: none"> <li>• Tier 1 to 4 Villages (60%)</li> <li>• Urban extensions and rural villages (40%)</li> </ul>

**Table 2: Housing Options Summary**



## Spatial Housing Strategy Option A: Maximise Open Countryside release

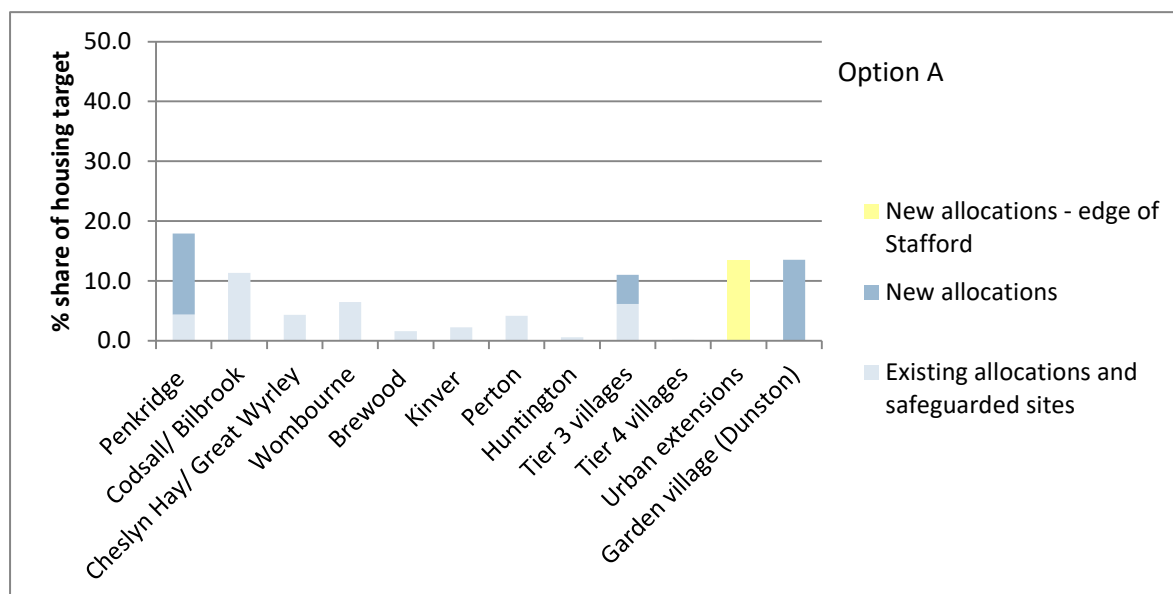
Focusing new allocations in land designated Open Countryside in the north west of the district

This option has been prepared to allow the Council to consider the impacts for sustainable development of seeking to meet its housing needs by channelling growth beyond the Green Belt. It examines the additional capacity that could be met by maximising as much housing supply as possible in Open Countryside locations within the district, regardless of whether or not this pattern of development would be supported by local infrastructure, accord with other national policies or be considered a sustainable strategy.

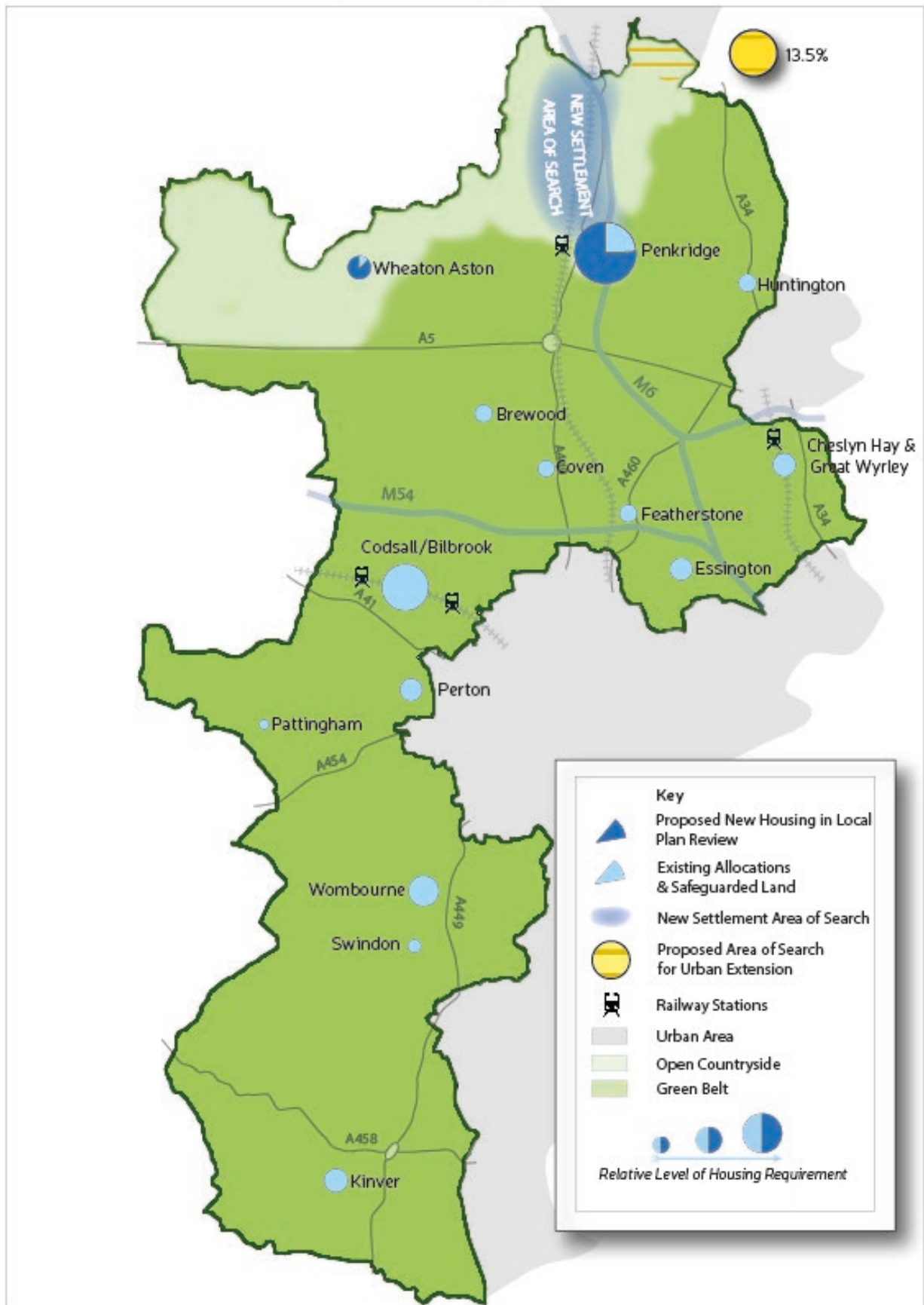
This option would imply significant growth on all potential Open Countryside sites around Wheaton Aston; very large urban extensions north of Penkridge and south of Stafford; and a new garden village around Dunston. In other settlements surrounded by Green Belt, additional land is only released in non-Green Belt locations (i.e. safeguarded land and suitable sites within the development boundary). Even if all of these supply options could be maximised and had no deliverability issues the district would only deliver approximately 7,876 dwellings within the plan period, falling short of the preferred housing target of 8,845 dwellings. This would mean the Council would not be able to provide a contribution of up to 4,000 dwellings towards the unmet needs of the GBHMA, contrary to the proposed approach set out in the 2018 Issues and Options document.

- New allocations in Penkridge and Wheaton Aston ● Meets South Staffordshire’s housing needs
- Doesn’t deliver proposed contribution to wider unmet housing needs

### What would this look like?



### Spatial Strategy: Option A



<b>Spatial Housing Strategy Option A</b>	
<p><b>Advantages:</b></p> <ul style="list-style-type: none"> <li>✓ Does not require Green Belt release to deliver strategy</li> <li>✓ May deliver known infrastructure opportunity in Penkridge (leisure centre improvements)</li> </ul>	<p><b>Disadvantages:</b></p> <ul style="list-style-type: none"> <li>✗ Does not align growth with areas of the district with greatest access to services and employment (other than Penkridge)</li> <li>✗ Does not deliver the majority of recommended growth areas in the GBHMA Strategic Growth Study</li> <li>✗ Does not deliver additional growth in rural settlements with the worst affordability to local residents</li> <li>✗ Doesn't deliver additional growth in the majority of rural settlements with greatest numbers of young residents</li> <li>✗ Focuses urban extensions away from the two adjacent local authorities with unmet housing needs</li> <li>✗ Does not align well to the 2018 Sustainability Appraisal, as growth is focused away from most Tier 1 and 2 villages, with large-scale growth made at a Tier 3 village instead (Wheaton Aston)</li> <li>✗ Focuses significant growth in close proximity to a Special Area of Conservation west of Wheaton Aston</li> <li>✗ Would allocate very large amounts of growth at Penkridge, which is a historic settlement recognised by the Historic Environment Character Assessment(HECA), in close proximity to its conservation area</li> <li>✗ Growth allocated to Wheaton Aston would likely affect its historic field pattern, which is recognised in the HECA</li> <li>✗ Poorly aligns growth with infrastructure opportunities</li> <li>✗ Doesn't allow the district to deliver up to 4,000 dwellings to the unmet needs of the housing market area</li> <li>✗ Dunston may not deliver a sustainable new settlement in the plan period, based on current information</li> <li>✗ There is a current lack of landowner co-operation to deliver a single urban extension north of Penkridge with the necessary infrastructure required</li> <li>✗ Heavily reliant on large scale sites to deliver growth, with very little scope to meet the requirement for 10% of growth to be delivered on small sites as required by the NPPF</li> </ul>

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## Spatial Housing Strategy Option B:

### Prioritising Green Belt land release in areas of lesser Green Belt harm

Focusing growth in areas of open countryside and where any harm to Green Belt is comparatively less

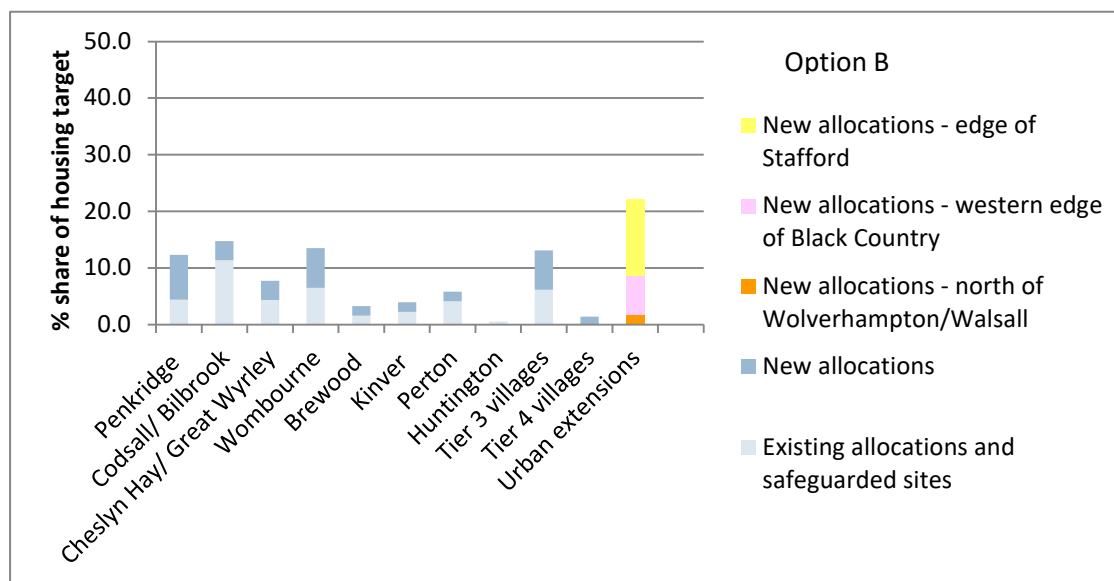
This option meets the preferred housing target of 8,845 dwellings between 2018 and 2037. Under this option, 75% of development in the plan period would occur in the district’s rural villages, whilst 25% would occur in urban extensions to neighbouring urban areas or the wider rural area. Under this option, additional growth is allocated to broad locations where it could be delivered without the release of any ‘high’ or ‘very high’ harm areas of Green Belt, as identified in the South Staffordshire Green Belt Study 2019. This means that the growth apportioned to each broad location under this option would be accommodated on areas of Green Belt land of ‘moderate – high’ harm or less, or Open Countryside beyond the Green Belt where this is available.

In apportioning growth between the area’s rural settlements, this option also reflects each settlement’s role in the district’s revised settlement hierarchy, giving higher levels of growth to higher tiers of the settlement hierarchy. Therefore, the size of new allocations to individual settlements reflects each settlement’s role in the hierarchy, unless it is clear from the Green Belt Study 2019 that this level of growth would require the release of ‘high’ or ‘very high’ harm areas of Green Belt.

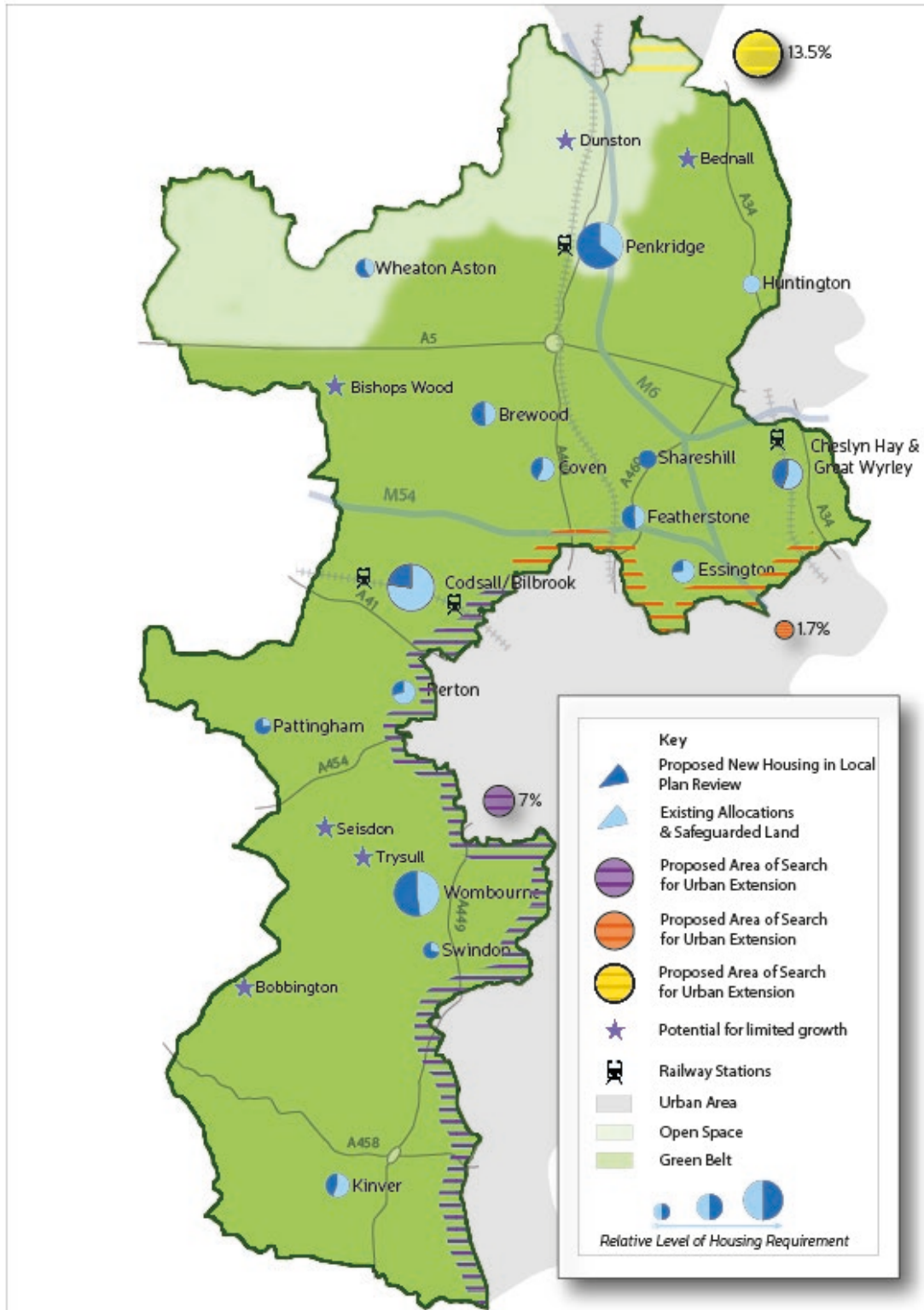
Equally, this option also seeks growth in areas adjacent to neighbouring towns and cities where this can be accommodated without the release of any ‘high’ or ‘very high’ harm areas of Green Belt, recognising the relative sustainability of these areas. The apportionment of growth between different areas of search for urban extensions reflects the extent to which there are opportunities to accommodate growth on less harmful Green Belt sites or areas of Open Countryside beyond the Green Belt. This option also has regard to the relative performance of the Green Belt between the district’s rural settlements and the urban edge of adjacent towns and cities. This means the district’s rural areas share a greater proportion of the planned growth, as they generally contain less areas of ‘high’ or ‘very high’ Green Belt harm.

Housing focussed in: • Tier 1 to 4 villages (75%) • urban extensions and wider rural area (25%)

### What would this look like?



### Spatial Strategy: Option B



<b>Spatial Housing Strategy Option B</b>	
<p><b>Advantages:</b></p> <ul style="list-style-type: none"> <li>✓ Delivers significant growth adjacent to Tier 1 settlements, which have greater levels of access to services and employment than other rural settlements</li> <li>✓ Delivers growth in rural settlements with the worst affordability for local residents (Codsall/Bilbrook, Brewood, Wombourne)</li> <li>✓ Delivers growth in rural settlements with greatest numbers of young residents (Tier 1 settlements, Wombourne, Perton)</li> <li>✓ Partially aligns with the 2018 Sustainability Appraisal, by focusing more additional growth across a variety of small to large urban extensions</li> <li>✓ Delivers a range of small, medium and large allocations, balancing growth throughout the plan period</li> <li>✓ May deliver some known infrastructure opportunities in Penkridge (leisure centre improvements) and Brewood (car parking)</li> <li>✓ Aligns growth with areas well served by public transport (Tier 1 settlements and urban extensions adjacent to neighbouring towns and cities)</li> <li>✓ May facilitate development of brownfield Green Belt land at Wombourne</li> </ul>	<p><b>Disadvantages:</b></p> <ul style="list-style-type: none"> <li>✗ Delivers very little growth on the Black Country’s northern edge, despite greater access to services and employment in this area</li> <li>✗ Delivers significantly less growth in close proximity to local authorities with unmet housing needs when compared to other options</li> <li>✗ Does not reflect the 2018 Sustainability Appraisal in rural settlements, as growth is more evenly spread across Tier 1-4 settlements</li> <li>✗ Allocates strategic sites at historic settlements recognised by the Historic Environment Character Assessment and with extensive conservation areas (Brewood, Kinver and Penkridge)</li> <li>✗ Growth on the western edge of the Black Country may involve allocations in close proximity to a Registered Park and Garden</li> <li>✗ Levels of growth proposed mean strategy is unlikely to deliver known infrastructure opportunities at Codsall/Bilbrook (first school) and north of Black Country (ROF Featherstone access road and potential rail link)</li> <li>✗ Requires Green Belt release to deliver strategy</li> </ul>

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### Spatial Housing Strategy Option C: Carry forward existing Core Strategy strategic approach to distribution Locating 90% of growth in Tier 1 and 2 settlements and the remainder in Tier 3 settlements

This option meets the preferred housing target of 8,845 dwellings between 2018 and 2037. Under this option 100% of development in the plan period would occur in the district’s rural villages, with 90% being directed to the district’s more sustainable villages (Tier 1 & 2 settlements) with the remaining 10% being directed to Tier 3 villages.

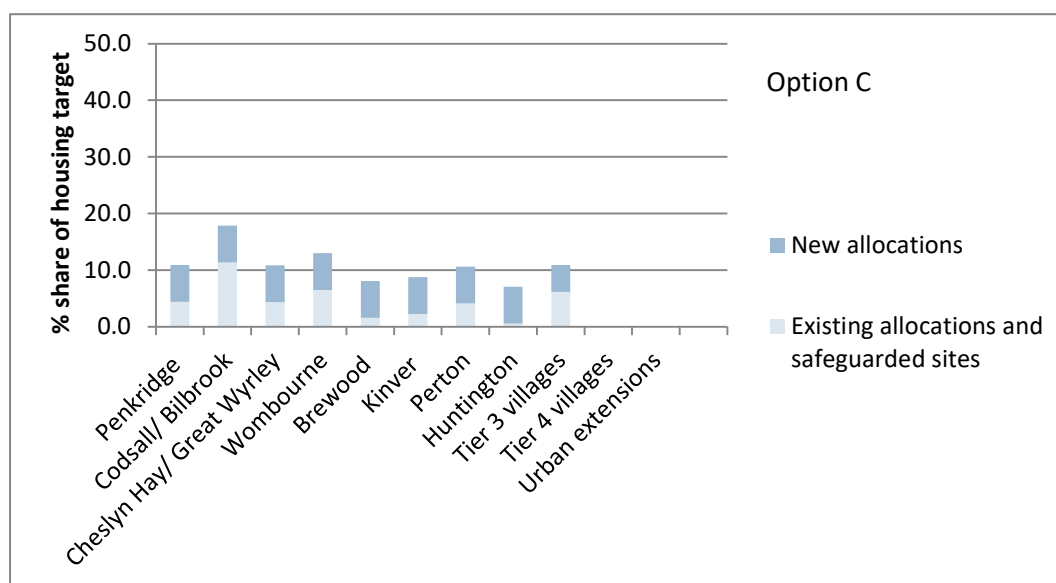
This option adopts an approach similar to the 90/10 distribution of growth between the Main and Local Service Villages previously identified in the adopted Core Strategy. To achieve this, this option proposes that approximately 90% of growth in the plan period occurs in the District’s Tier 1 and 2 settlements, recognising that these settlements are largely the same as the previous Main Service Villages which took 90% of growth in the Core Strategy. New land allocations are split evenly between all Tier 1 and 2 villages under this option, recognising that the previous spatial strategy did not split Main Service Villages into Tier 1 and 2 villages (unlike the current Rural Services and Facilities Audit 2019).

The remaining 10% of the plan target is focused towards the district’s Tier 3 villages, as these are largely the same settlements as the previous Local Service Villages which took 10% of growth in the Core Strategy. New land allocations to meet this 10% requirement would be split equally between all Tier 3 villages.

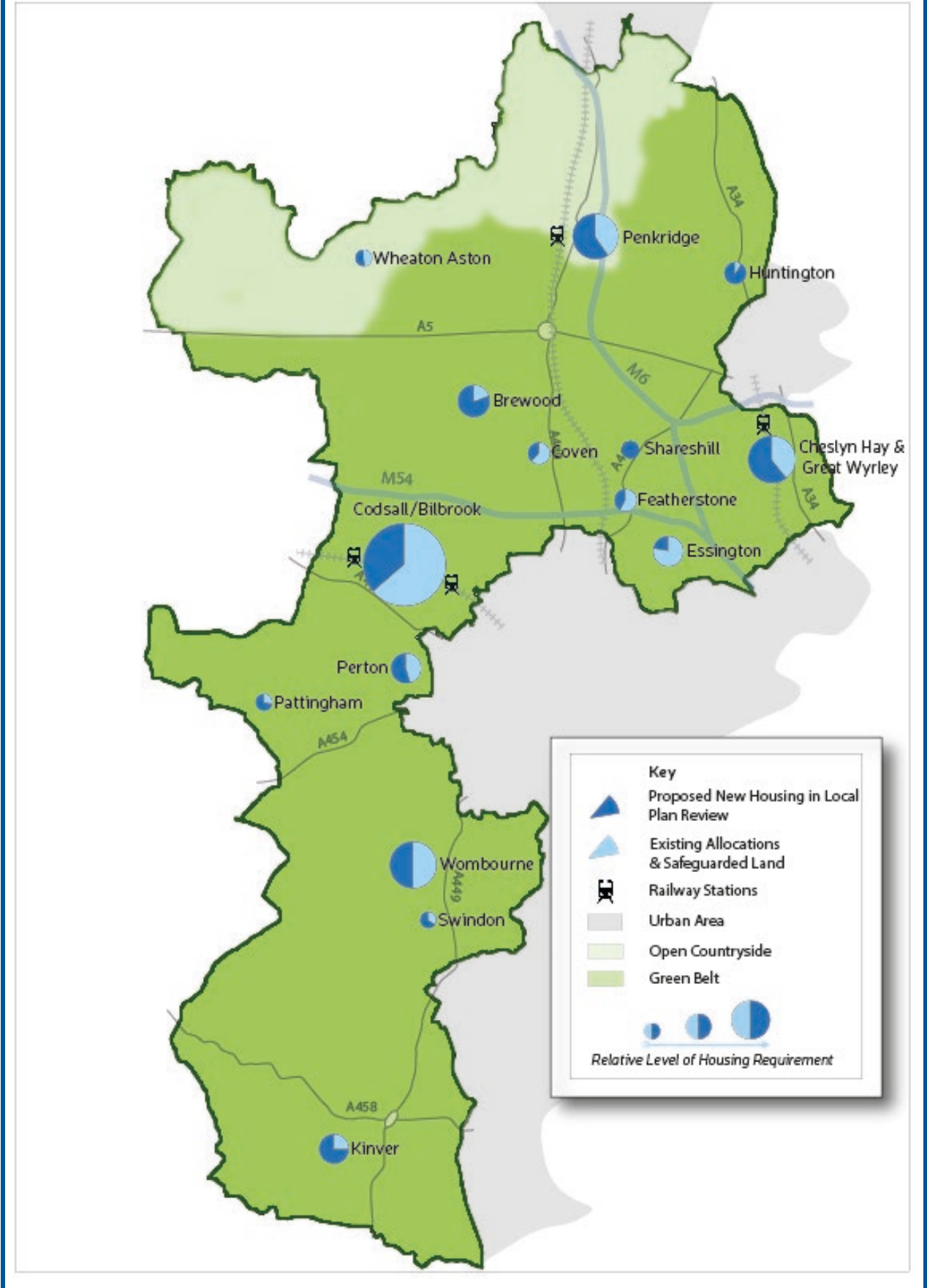
This option does not allocate any growth in areas which would require urban extensions of the Black Country or other neighbouring towns and cities. This recognises that such areas were not identified for growth in the previous spatial strategy. For similar reasons, no new settlements are proposed in this option.

Housing focussed in: ● Tier 1 and 2 Villages (90%) ● Tier 3 Villages (10%)

#### What would this look like?



### Spatial Strategy: Option C



Spatial Housing Strategy Option C	
<p><b>Advantages:</b></p> <ul style="list-style-type: none"> <li>✓ Delivers significant growth adjacent to Tier 1 settlements, which have greater levels of access to services and employment than other rural settlements</li> <li>✓ Allocates growth in some areas recommended by the GBHMA Strategic Growth Study (specifically in Codsall/Bilbrook and Penkridge)</li> <li>✓ Delivers growth in rural settlements with the worst affordability for local residents (Codsall/Bilbrook, Brewood, Wombourne)</li> <li>✓ Delivers growth in rural settlements with greatest numbers of young residents (Tier 1 settlements, Wombourne, Perton)</li> <li>✓ May deliver infrastructure opportunities in Codsall/Bilbrook (first school), Penkridge (leisure centre improvements), Brewood (car parking) and Perton (strategic green infrastructure/Green Belt compensatory measures)</li> <li>✓ Partially aligns growth with areas best served by public transport (Tier 1 settlements)</li> <li>✓ Facilitates delivery of brownfield Green Belt land at Wombourne</li> </ul>	<p><b>Disadvantages:</b></p> <ul style="list-style-type: none"> <li>✗ Does not deliver any growth on the Black Country’s northern edge, despite greater access to services and employment in this area</li> <li>✗ Will likely require allocations in Green Belt areas of high or very high harm at Codsall/Bilbrook, Perton, Huntington and Cheslyn Hay/Great Wyrley</li> <li>✗ Does not reflect recommendations of the GBHMA Strategic Growth Study in the i54/ROF Featherstone corridor or on the western edge of the Black Country</li> <li>✗ Does not deliver any growth adjacent to local authorities with unmet housing needs</li> <li>✗ Does not align well with 2018 Sustainability Appraisal, as it prioritises significant levels of growth to Tier 3 settlements, whilst no growth is delivered in more sustainable urban extensions to neighbouring towns and cities</li> <li>✗ Level of growth at Huntington would deliver significant development in/adjacent to Cannock Chase Area of Outstanding Natural Beauty</li> <li>✗ Allocates strategic sites at historic settlements recognised by the Historic Environment Character Assessment and with extensive conservation areas (Brewood, Kinver and Penkridge)</li> <li>✗ Relies heavily on small/medium sites, with little/no scope for larger sites to deliver growth towards the end of the plan period</li> <li>✗ Does not facilitate delivery of infrastructure opportunities at ROF Featherstone</li> <li>✗ Does not deliver growth adjacent to neighbouring towns and cities, despite their relative level of public transport provision</li> <li>✗ Requires Green Belt release to deliver strategy</li> </ul>

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## Spatial Housing Strategy Option D:

### Maximising sites in areas identified in the GBHMA Strategic Growth Study

Focusing growth in urban extensions at Penkridge and north of Wolverhampton, and sites west of the Black Country and north of Codsall/Bilbrook

This option meets the preferred housing target of 8,845 dwellings between 2018 and 2037. Under this option, growth is maximised at villages identified as having potential for strategic levels of growth in the GBHMA Strategic Growth Study, namely Penkridge and Codsall/Bilbrook. A single urban extension would be accommodated in the area to the north of the Black Country conurbation (in the i54/ROF Featherstone corridor) whilst smaller urban extensions are allocated to the Black Country conurbation’s western edge. These reflect the opportunities for employment-led housing growth and dispersed housing sites in these locations in the Strategic Growth Study. Under this option 70% of development in the plan period would occur in the district’s rural villages, whilst 30% would occur in urban extensions to neighbouring urban areas or the wider rural area.

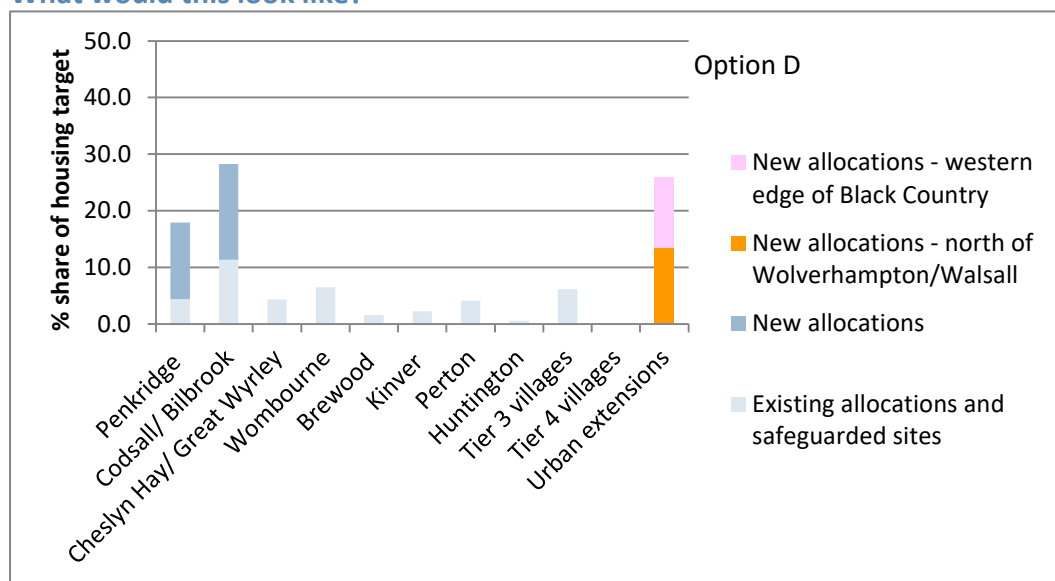
The key locations identified in the GBHMA Strategic Growth Study within South Staffordshire are as follows:

- Urban extension: North of Penkridge (1,500 – 7,500 dwellings)
- Urban extension (employment-led): North of Wolverhampton in the vicinity of i54 (1,500 – 7,500 dwellings)
- Dispersed housing sites: Western edge of the conurbation between Stourbridge and Wolverhampton (500 – 2,500 dwellings)
- Dispersed housing sites: North of Codsall/Bilbrook (500 – 2,500 dwellings)

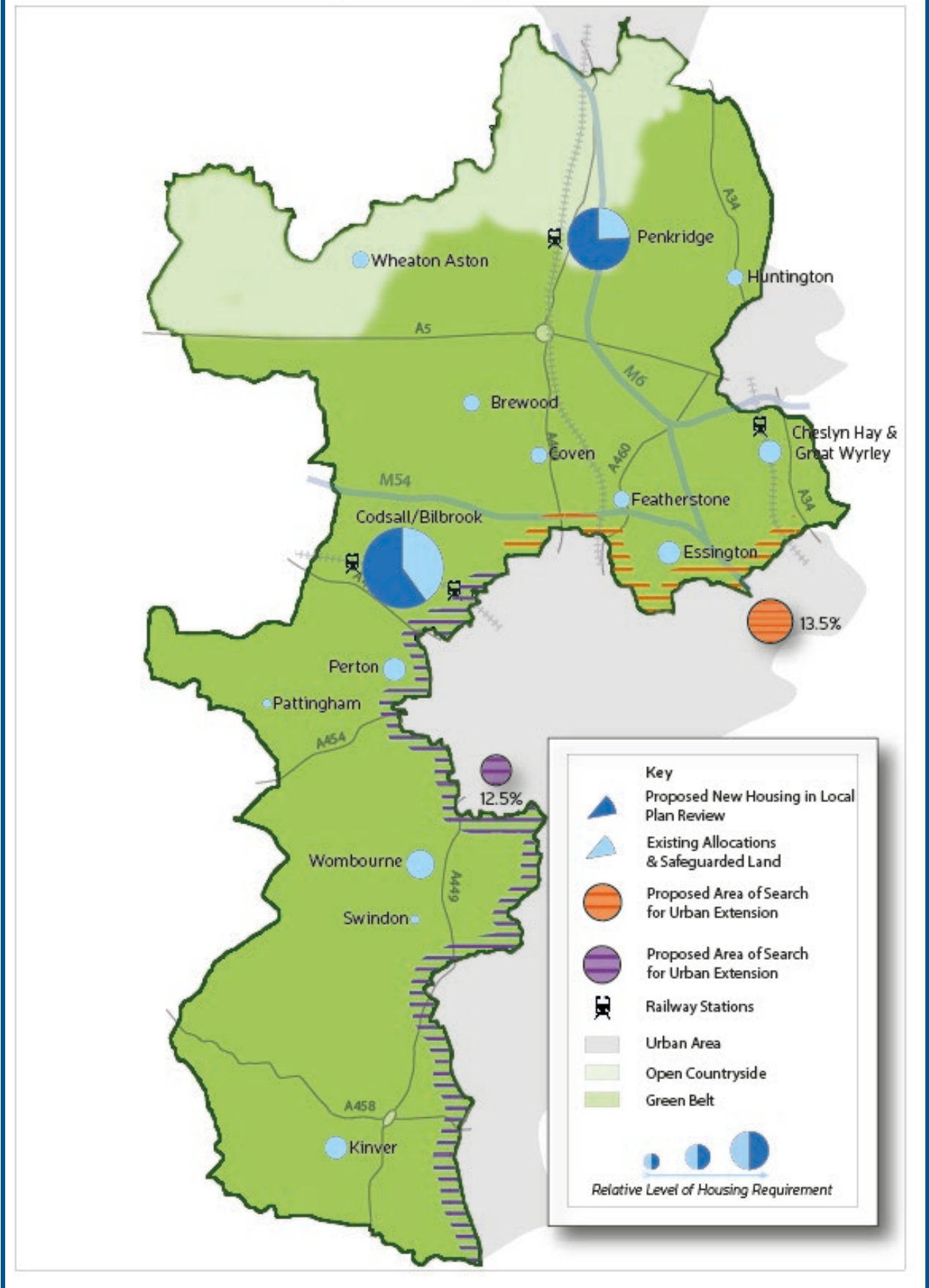
In each of these locations, this option seeks to maximise the amount of growth likely to be realised within the plan period (i.e. up to 2037). Whilst this has some regard to the likely availability of sites in each location, in some areas (e.g. north of Penkridge) there is not currently landowner agreement to deliver a comprehensive scheme representative of the findings of the GBHMA Strategic Growth Study. This is not reflected in this option as it would result in a level of growth below the minimum recommendations of the GBHMA Strategic Growth Study. This means that some levels of growth presented under this option may not currently be considered deliverable.

Housing focussed in: • Tier 1 to 4 Villages (70%) • urban extensions and wider rural area (30%)

#### What would this look like?



### Spatial Strategy: Option D



<b>Spatial Housing Strategy Option D</b>	
<p><b>Advantages:</b></p> <ul style="list-style-type: none"> <li>✓ Closely aligns growth to areas of the district with greater levels of access to services and employment (north of the Black Country, Tier 1 settlements, the A449 corridor)</li> <li>✓ Allocates growth in areas recommended by the GBHMA Strategic Growth Study, where there is available land to deliver these recommendations</li> <li>✓ Focuses the majority of urban extensions in close proximity to neighbouring towns and cities with unmet needs</li> <li>✓ Aligns well with the 2018 Sustainability Appraisal, by focusing more additional growth in Tier 1 and 2 settlements and urban extensions</li> <li>✓ May deliver known infrastructure opportunities, specifically in Codsall/Bilbrook (first school), Penkridge (leisure centre improvements) and north of Black Country (ROF Featherstone access road and potential rail link)</li> <li>✓ Aligns growth with areas best served by public transport (Tier 1 settlements and urban extensions)</li> </ul>	<p><b>Disadvantages:</b></p> <ul style="list-style-type: none"> <li>✗ Will likely require allocations in Green Belt areas of high or very high harm in Codsall/Bilbrook and north of the Black Country conurbation</li> <li>✗ Does not deliver additional growth in rural settlements with the worst affordability for local residents (Brewood, Wombourne)</li> <li>✗ Does not deliver additional growth in Wombourne or Perton, despite the significant proportion of the district’s young residents in these settlements</li> <li>✗ Would allocate very large amounts of growth at Penkridge, which is a historic settlement recognised by the Historic Environment Character Assessment(HECA), in close proximity to its conservation area</li> <li>✗ This scale of growth would likely result in significant allocations being made in close proximity to the well-preserved conservation area in Codsall</li> <li>✗ Heavily reliant on large sites to deliver growth, with very little scope to meet the requirement for 10% of growth to be delivered on small sites as required by the NPPF</li> <li>✗ Would not prioritise development of brownfield Green Belt land at Wombourne</li> <li>✗ There is a current lack of landowner co-operation to deliver a single urban extension north of Penkridge with the necessary infrastructure required</li> <li>✗ Requires Green Belt release to deliver strategy</li> </ul>

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## Spatial Housing Strategy Option E:

### Addressing local affordability issues and settlements with the greatest needs

Focusing growth in the least affordable areas of the district, where there are more younger people and in areas near to the source of unmet housing needs in the Black Country

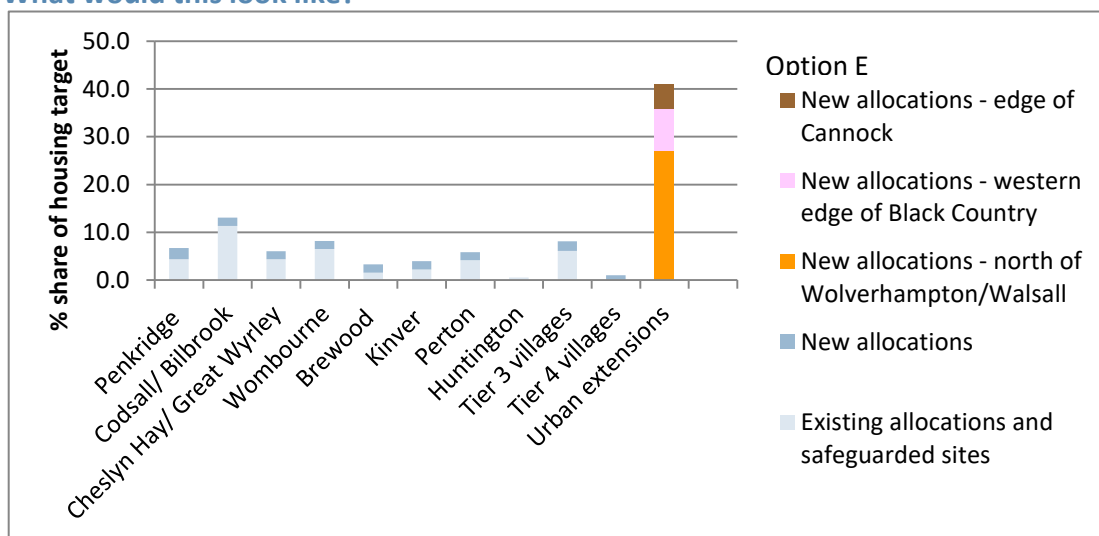
This option meets the preferred housing target of 8,845 dwellings between 2018 and 2037. This option seeks to distribute new housing growth in a manner which reflects the locations from which housing needs are generated, having regard to local affordability ratios, where the district’s younger population is concentrated and the location of unmet needs arising from neighbouring authorities. Unlike the options which reflect local infrastructure opportunities and environmental constraints (e.g. Spatial Option G) or which reflect the findings of a strategic cross-authority study of sustainability and environmental/Green Belt capacity (e.g. Spatial Housing Options D), this option focuses solely on how housing growth may be distributed to meet needs where they arise.

Growth to the villages is dispersed across all four village tiers under this option, with allocations only being made within each tier at the district’s less affordable rural settlements or in those with larger proportions of younger residents. The remainder of housing growth is focused in urban extensions. Large urban extensions are focused to the north of the Black Country conurbation recognising that this broad location sits in close proximity to Wolverhampton and Walsall, which have unmet housing needs. The remaining housing requirement is split between the western edge of the Black Country and Cannock, recognising that these areas are generally not adjacent to local authorities with unmet housing needs, but are nonetheless adjacent to major population centres within the same housing market area as South Staffordshire.

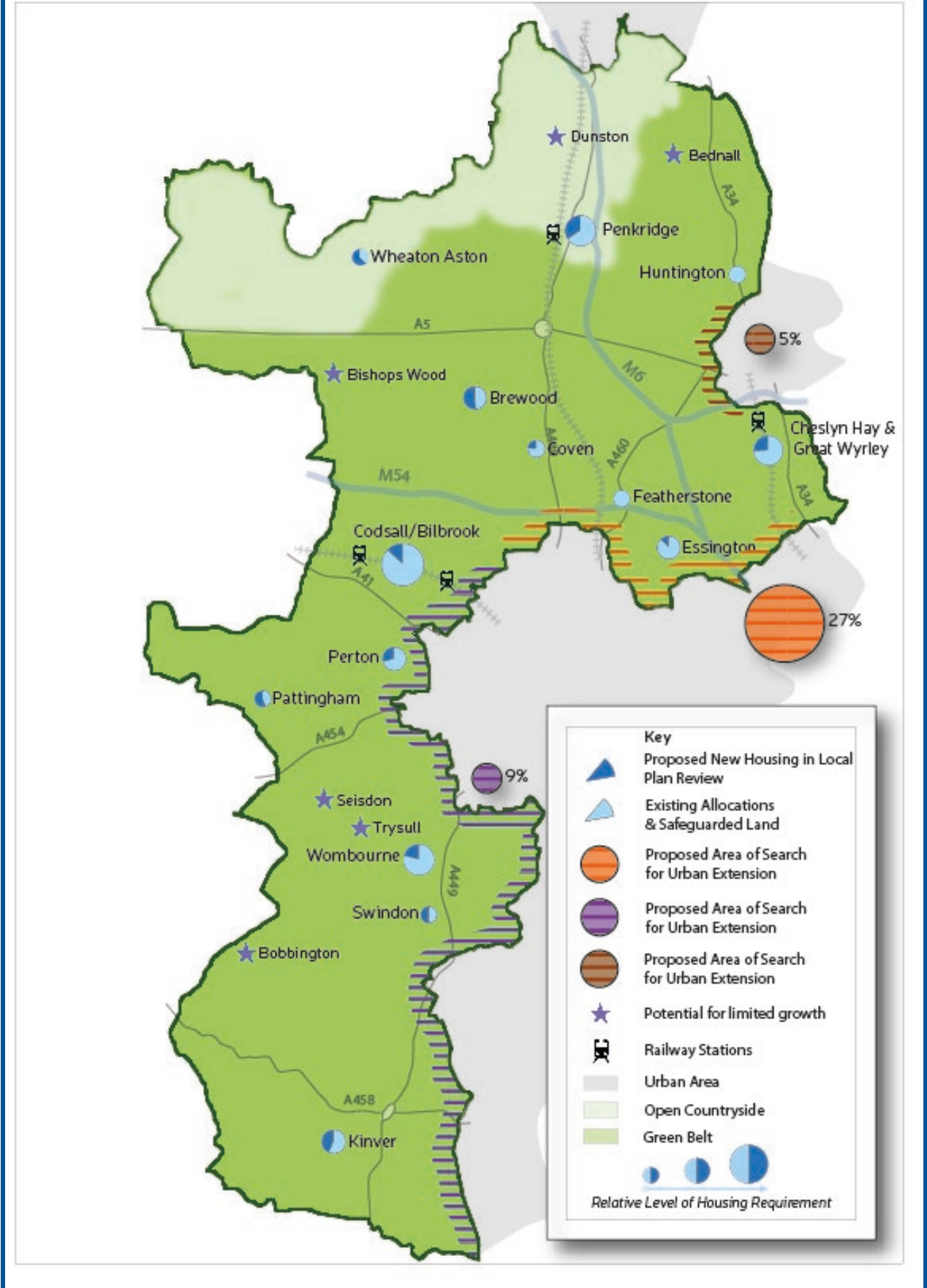
Under this option approximately 60% of development in the plan period would occur in the district’s rural villages, whilst approximately 40% would occur in urban extensions to neighbouring urban areas or the wider rural area. The split between village growth and urban extensions seeks to provide a split between the amount of dwellings delivered adjacent to neighbouring areas and the rural settlements of South Staffordshire which reflects the split between the district’s own needs and the unmet needs of other areas. This means that growth in South Staffordshire’s villages is limited to an amount necessary to address the district’s own needs, whilst the level of growth outside of the Tier 1-4 settlements adjacent to the neighbouring GBHMA towns and cities is more reflective of the potential 4,000 dwelling contribution to the unmet needs of the housing market area.

Housing focussed in: ● Tier 1 -4 Villages (60%) ● urban extensions and wider rural area (40%)

#### What would this look like?



### Spatial Strategy: Option E



<b>Spatial Housing Strategy Option E</b>	
<p><b>Advantages:</b></p> <ul style="list-style-type: none"> <li>✓ Delivers significant growth adjacent to the northern edge of the Black Country, which has greater levels of access to services and employment</li> <li>✓ Allocates growth in some areas recommended by the GBHMA Strategic Growth Study (specifically in the ROF/i54 corridor and the western edge of the Black Country conurbation)</li> <li>✓ Delivers growth in rural settlements with the worst affordability for local residents (Codsall/Bilbrook, Brewood, Wombourne)</li> <li>✓ Delivers growth in rural settlements with greatest numbers of young residents (Tier 1 settlements, Wombourne, Perton)</li> <li>✓ Focuses the majority of urban extensions in close proximity to neighbouring towns and cities with unmet housing needs</li> <li>✓ Partially reflects the 2018 Sustainability Appraisal, by focusing more additional growth to urban extensions</li> <li>✓ Delivers a range of small, medium and large allocations, balancing growth throughout the plan period</li> <li>✓ May deliver known infrastructure opportunity north of Black Country (ROF Featherstone access road and potential rail link)</li> <li>✓ Partially aligns growth with areas best served by public transport (urban extensions to neighbouring towns and cities)</li> </ul>	<p><b>Disadvantages:</b></p> <ul style="list-style-type: none"> <li>✗ Will likely require allocations in Green Belt areas of high or very high harm to the north of the Black Country conurbation</li> <li>✗ Does not focus growth in rural settlements to Tier 1 settlements, which have greater levels of access to services and employment</li> <li>✗ Does not reflect recommendations of the GBHMA Strategic Growth Study north of Penkridge and at Codsall/Bilbrook</li> <li>✗ Allocates strategic sites at historic settlements recognised by the Historic Environment Character Assessment and with extensive conservation areas (Brewood and Kinver)</li> <li>✗ Growth on the western edge of the Black Country may involve allocations in close proximity to a registered park and garden</li> <li>✗ Does not focus growth on rural settlements best served by public transport (Tier 1 settlements)</li> <li>✗ Requires Green Belt release to deliver strategy</li> </ul>

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## Spatial Housing Strategy Option F: Giving first consideration to Green Belt land which is previously developed or well-served by public transport

Focusing growth in Green Belt areas with good public transport links or available brownfield sites

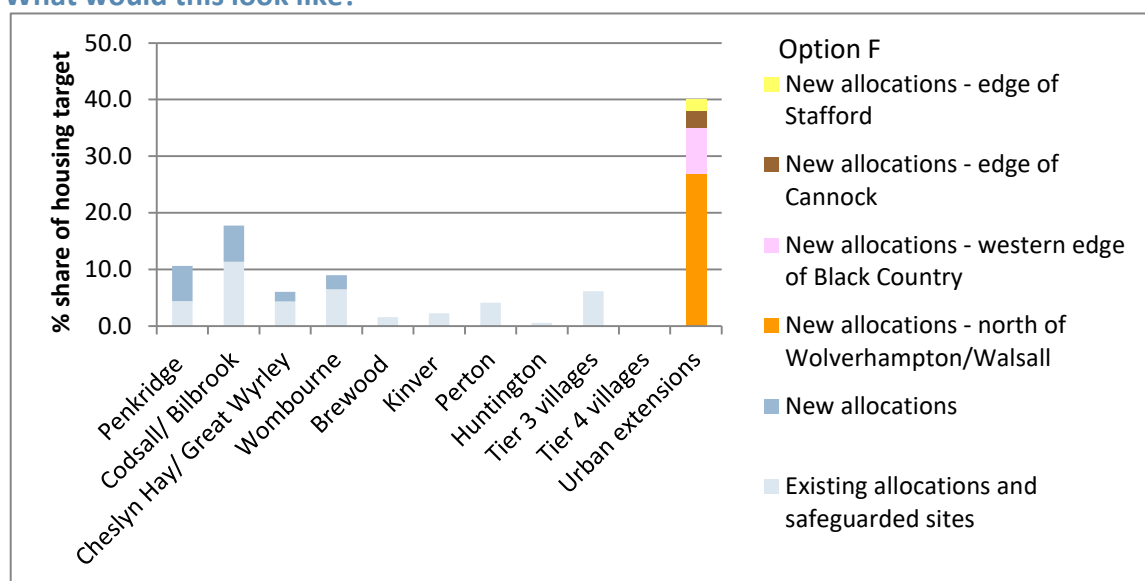
This option meets the preferred housing target of 8,845 dwellings between 2018 and 2037. Under this option approximately 60% of development in the plan period would occur in the district’s rural villages, whilst approximately 40% would occur in urban extensions to neighbouring urban areas or the wider rural area. Additional allocations are only made to villages with the best public transport links (i.e. Tier 1 villages) or villages with significant opportunities to expand onto previously developed land in the Green Belt (i.e. Wombourne). The remaining plan requirement is allocated to sites on the fringes of housing market area towns and cities (i.e. the Black Country and Cannock), recognising that these settlements offer public transport links in the closest proximity to higher order service centres in these areas.

The aim of this Spatial Option is to present a strategy that focuses solely on the NPPF requirement to give first consideration to “land which has been previously-developed and/or is well-served by public transport” when releasing Green Belt. Therefore, additional allocations are only made to settlements with the best public transport links (i.e. Tier 1 settlements) or settlements with significant opportunities to expand onto previously developed land in the Green Belt (i.e. Wombourne).

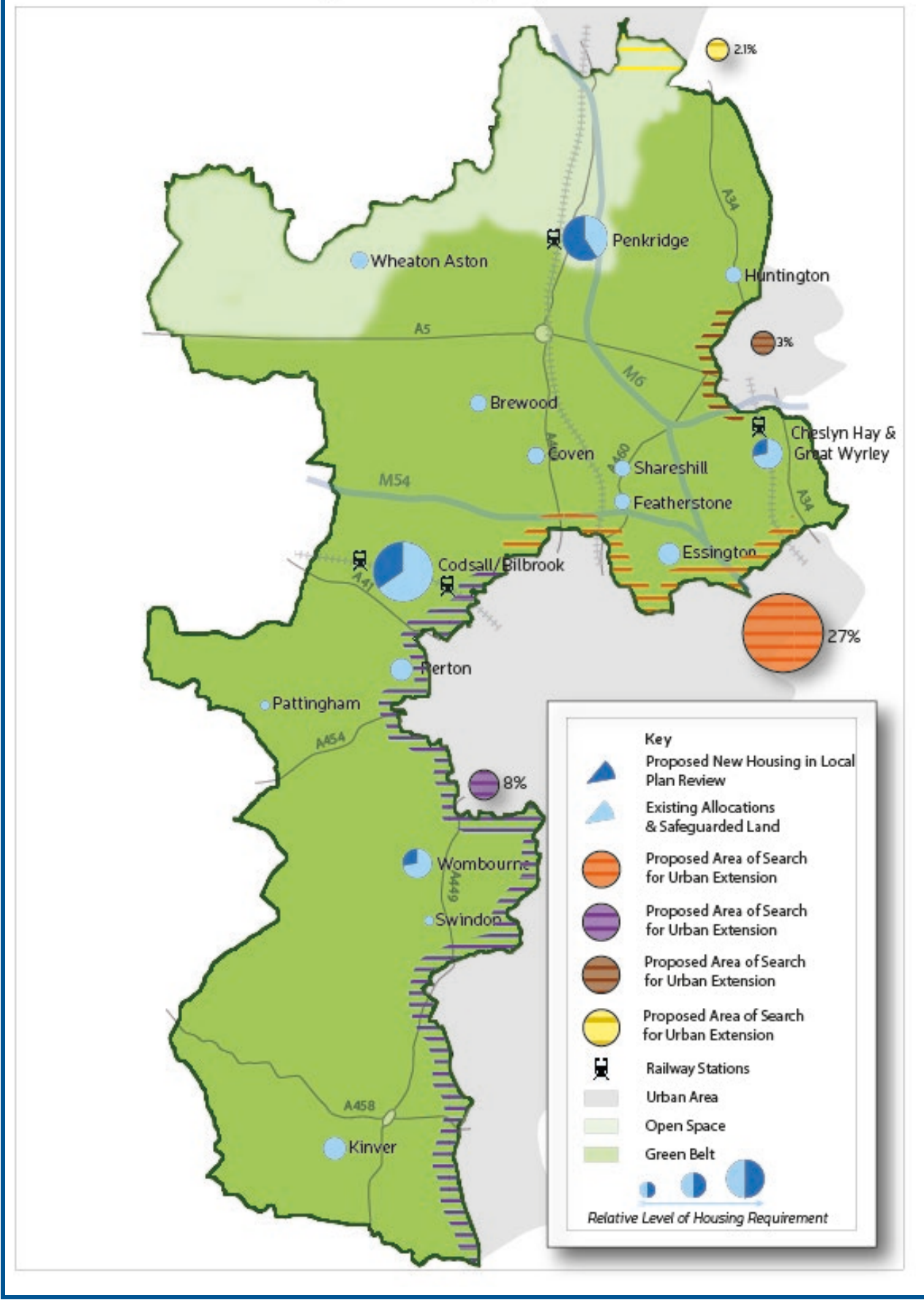
This Spatial Option also releases an amount of land within the wider Open Countryside which has regard to “the consequences for sustainable development of channelling development ... towards locations beyond the outer Green Belt boundary”, in accordance with the NPPF. To achieve this, allocations are also made within Open Countryside locations where there is available and potentially deliverable land to deliver growth through urban extensions or allocations to Tier 1 and 2 settlements. This recognises that such Tier 1 and 2 settlements and urban extensions to neighbouring areas performed particularly well in the 2018 Issues and Options consultation Sustainability Appraisal.

Housing focussed in: ● Tier 1 to 4 villages (60%) ● urban extensions and wider rural area (40%)

### What would this look like?



### Spatial Strategy: Option F



Spatial Housing Strategy Option F	
<p><b>Advantages:</b></p> <ul style="list-style-type: none"> <li>✓ Closely aligns growth to areas of the district with greater levels of access to services and employment (north of the Black Country, Tier 1 settlements, the A449 corridor)</li> <li>✓ Allocates growth in areas recommended by the GBHMA Strategic Growth Study, where there is available land to deliver these recommendations</li> <li>✓ Delivers growth in some of the rural settlements with the worst affordability for local residents (Codsall/Bilbrook, Wombourne) or with high proportions of the district’s younger population</li> <li>✓ Aligns well with the 2018 Sustainability Appraisal, by focusing more additional growth in Tier 1 and 2 settlements and urban extensions</li> <li>✓ Focuses the majority of urban extensions in close proximity to neighbouring towns and cities with unmet housing needs</li> <li>✓ May deliver infrastructure opportunities in Codsall/Bilbrook (first school), Penkridge (leisure centre improvements) and north of Black Country (ROF Featherstone access road and potential rail link)</li> <li>✓ Fully aligns growth with locations best served by public transport (Tier 1 settlements and extensions to adjacent towns and cities)</li> <li>✓ May facilitate delivery of brownfield Green Belt land at Wombourne</li> </ul>	<p><b>Disadvantages:</b></p> <ul style="list-style-type: none"> <li>✗ Will likely require allocations in Green Belt areas of high or very high harm in Codsall/Bilbrook and north of the Black Country conurbation</li> <li>✗ Does not deliver additional growth in Brewood, despite it having one of the worst affordability ratios for local residents or in Perton, despite it containing large proportions of the district’s younger population</li> <li>✗ Would allocate larger amounts of growth in a historic settlement recognised by the Historic Environment Character Assessment (Penkridge), in close proximity to its conservation area</li> <li>✗ Growth on the western edge of the Black Country may involve allocations in close proximity to a registered Park and Garden</li> <li>✗ Heavily reliant on large and medium sized sites to deliver growth, with very little scope to meet the requirement for 10% of growth to be delivered on small sites as required by the NPPF</li> <li>✗ Requires Green Belt release to deliver strategy</li> </ul>

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## Preferred Option - Spatial Housing Strategy Option G: Infrastructure-led development with a garden village area of search beyond the plan period

Focusing growth on strategic sites that will deliver new or improved infrastructure, and in areas near to the source of unmet housing needs in the Black Country. Also identifying an area of search to recognise the opportunity for a new settlement beyond the plan period.

This option meets the preferred housing target of 8,845 dwellings between 2018 and 2037. Under this option, growth on strategic sites is prioritised in locations where it could help to meet local infrastructure needs and opportunities, with smaller allocations being made in other broad locations having regard to their local environmental constraints. Urban extensions are provided across all neighbouring authorities within the Greater Birmingham Housing Market Area (GBHMA) with unmet housing needs to ensure that the district’s contribution to the GBHMA shortfall is met in locations from which households are being displaced.

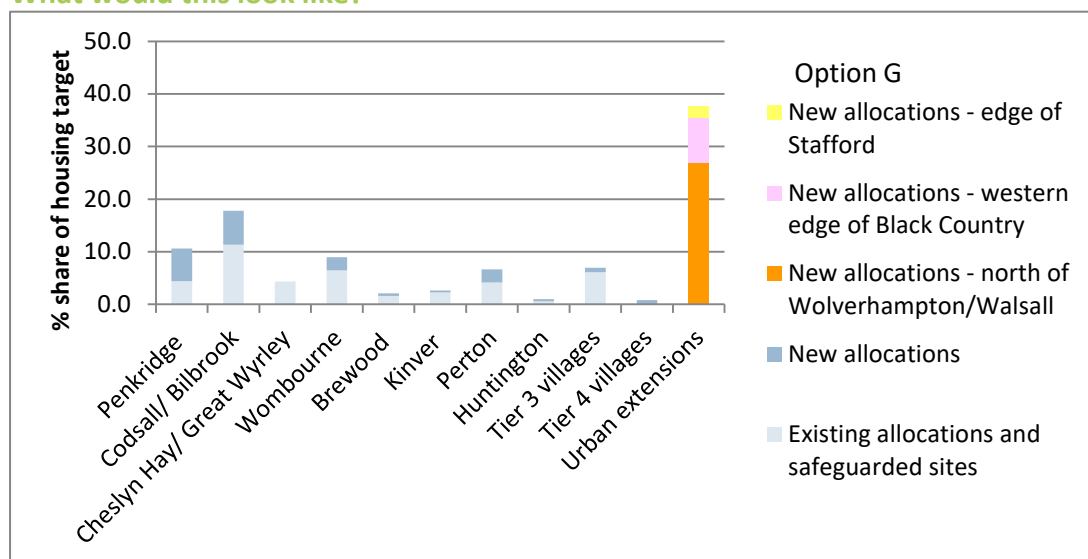
Under this option approximately 60% of development in the plan period would occur in the district’s rural villages, whilst approximately 40% would occur in urban extensions to neighbouring urban areas or other rural locations. An area of search for a new settlement to be delivered beyond the plan period would also be established along the A449 corridor. This recognises the potential longer term opportunities in this location which may be explored following the plan’s adoption, through reviews of the Local Plan or a separate Garden Village Development Plan Document (DPD).

Growth in the villages is dispersed across all four village tiers under this option. A larger proportion of housing growth is focused on Tier 1 and 2 villages where significant opportunities to achieve infrastructure improvements through new development exist, having regard to other environmental constraints (e.g. historic settlements with extensive Conservation Areas or settlements constrained by a designated landscape). The apportionment reflects infrastructure opportunities where these have been confirmed by the infrastructure provider (e.g. need for a 2FE First School for Codsall/Bilbrook)

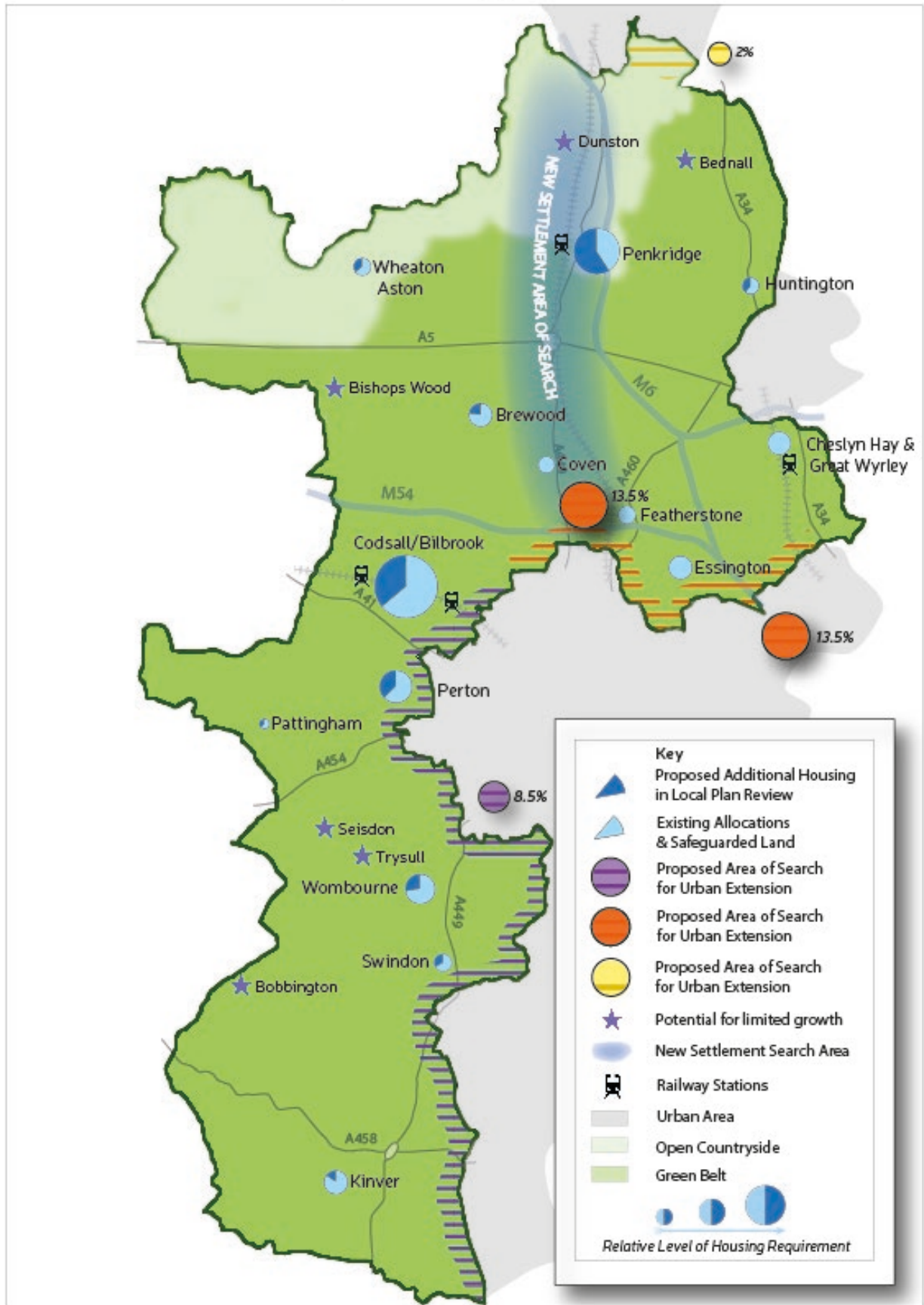
Larger urban extensions are focused to the north of the Black Country conurbation, recognising the availability of larger sites in this location and the opportunities to deliver strategic infrastructure needs around the ROF strategic employment site. The remaining housing requirement is split between the western edge of the Black Country and south of Stafford, in a manner that recognises the Black Country’s role in contributing to the unmet housing needs of the HMA.

Housing focussed in: ● Tier 1 to 4 Villages (60%) ● urban extensions & wider rural area (40%)

### What would this look like?



### Spatial Strategy: Option G



## Spatial Housing Strategy Option G

### Advantages:

- ✓ Closely aligns growth to areas of the district with greater levels of access to services and employment (north of the Black Country, majority of Tier 1 settlements, the A449 corridor)
- ✓ Allocates growth in areas recommended by the GBHMA Strategic Growth Study, where there is available land to deliver these recommendations
- ✓ Delivers growth in some of the rural settlements with the worst affordability for local residents (Codsall/Bilbrook, Brewood, Wombourne)
- ✓ Delivers growth in rural settlements with greatest numbers of young residents (Tier 1 settlements, Wombourne, Perton)
- ✓ Focuses the majority of urban extensions in close proximity to neighbouring towns and cities with unmet housing needs
- ✓ Aligns well with the 2018 Sustainability Appraisal, by focusing more additional growth in Tier 1 and 2 settlements, urban extensions and a potential new settlement area of search
- ✓ Delivers a range of small, medium and large allocations, balancing growth throughout the plan period
- ✓ May deliver infrastructure opportunities in Codsall/Bilbrook (first school), Penkridge (leisure centre improvements), north of Black Country (ROF Featherstone access road and potential rail link), Brewood (car parking) and Perton (strategic green infrastructure/Green Belt compensatory measures)
- ✓ Aligns growth with areas well served by public transport (Tier 1 settlements and urban extensions adjacent to neighbouring towns and cities)
- ✓ May facilitate delivery of previously developed land in the Green Belt at Wombourne

### Disadvantages:

- ✗ Will likely require allocations in Green Belt areas of high or very high harm in Codsall/Bilbrook and north of the Black Country conurbation
- ✗ Would allocate larger amounts of growth in a historic settlement recognised by the Historic Environment Character Assessment (Penkridge), in close proximity to its conservation area
- ✗ Growth on the western edge of the Black Country may involve allocations in close proximity to a registered park and garden
- ✗ Requires Green Belt release to deliver strategy

## 5. Conclusions on the Spatial Housing Options

### The Council's Preferred Approach

- 5.1 Section 4 of this document set out a number of different ways in which housing could be distributed across South Staffordshire, whilst ensuring the district can meet the amount of housing required in its area by 2037. This includes a range of different approaches to accommodating housing development in the district, based upon different strategic approaches.
- 5.2 **Having considered all of these different approaches and their relative merits in the round, the Council considers that an infrastructure-led strategy, Spatial Option G, represents a sound and sustainable strategy for accommodating the required amount of housing in the district by 2037.**
- 5.3 This approach would ensure the district can meet its own housing need and deliver a contribution towards the unmet needs of the housing market area. Our strategy takes positive elements of the other spatial housing options (e.g. good access to public transport, maximising brownfield opportunities, Strategic Growth Study recommendations) to form an appropriate strategy that also recognises the infrastructure aspirations of our communities. Spatial Option G would also help us to strike the right balance between the need to ensure a sustainable pattern of development is delivered, whilst also ensuring Green Belt release is minimised and avoids the most sensitive areas of Green Belt wherever possible. The council's judgement has considered not only the planning merits of each option set out in Section 4, but has also considered the Sustainability Appraisal (SA), which assesses each of the options against a series of sustainability indicators. This SA can be found on the Council's website. Feedback from this consultation on all of the spatial housing options will be used to consider whether the Council's preferred approach (Spatial Option G) should be amended to place greater weight to delivering other elements of the alternative options, or whether a different strategy should be pursued altogether.

### Employment and Gypsies, Travellers and Travelling Showpeople

- 5.4 The Council acknowledges that the spatial strategies considered at this time focus primarily on the distribution of housing growth across the district, and do not set out an explicit growth strategy for employment growth. The district is currently providing enough employment land to meet its own employment needs. This means that any potential employment land allocations in South Staffordshire are likely to be driven by unmet needs arising from adjacent authorities in the same employment market area as South Staffordshire. These are the Black Country authorities that have a strong economic relationship to the district (Wolverhampton, Walsall and Dudley). Furthermore, South Staffordshire is currently awaiting the outcome of an application submitted to the Secretary of State for a nationally significant employment site known as West Midlands Interchange, which could see a 297 hectare employment site come forward within the district. The Secretary of State's decision on this application is anticipated in early 2020 and is outside of the control of the Council.

- 5.5 The majority of the district’s new employment site suggestions are in the Green Belt and require further assessment in Stage 2 of the district’s Economic Development Needs Assessment (EDNA). The extent of the Black Country shortfall that relates to South Staffordshire and the planning inspectorate’s decision on West Midlands Interchange will clearly be fundamental for determining any future distribution of employment growth in the district. Therefore, given these uncertainties and the need to show that exceptional circumstances exist to release further Green Belt for employment, the Council is deferring the consideration of new employment growth in the District until the next stage of consultation on the Local Plan Review.
- 5.6 The Council is currently reviewing its needs and supply evidence regarding Gypsies, Travellers and Travelling Showpeople. Given that sites have historically come forward in Green Belt locations, the Council will need to fully explore other opportunities to accommodate new pitches, including exploring non Green Belt options if available and through discussions with neighbouring authorities through the Duty to Co-operate. Therefore, the Council will consider the need to allocate sites in the District for Gypsies, Travellers and Travelling Showpeople at the next stage of consultation on the Local Plan Review.

### Allocating new sites within the District

- 5.7 The Council intends to publish its Preferred Options Local Plan in summer 2020. Amongst other matters, this will set out the site allocations needed to deliver our growth needs, taking account of any amendments and updates necessary to the preferred spatial strategy approach that may arise following this consultation.
- 5.8 In order to ensure the Council’s approach to allocating sites is robust and proportionately focuses on the key issues affecting housing site options within the district, an outline methodology for assessing site allocation proposals has been prepared as part of this consultation. This builds upon the site selection themes set out in the 2018 Issues and Options consultation, setting out in more detail how the Council will identify and evaluate the comparative merits of potential development sites within the district. This methodology and the reasoning which supports it are set out in detail in Appendix 6 of this document.

### Green Belt release

- 5.9 It is clear that the Council’s housing target and desire to pursue the infrastructure-led strategy set out in Spatial Option G will only be deliverable if Green Belt is released to deliver additional housing land in the district. National planning policy requires Green Belt to be released for development only where exceptional circumstances can be demonstrated to justify this approach. This test includes demonstrating that as much use as possible has been made of suitable brownfield sites and underutilised land, whilst increasing housing densities, particularly in town and city centres and areas well-served by public transport. It also requires discussions with neighbouring authorities to be undertaken to see if unmet needs could be accommodated in neighbouring areas.
- 5.10 To date, the Council’s preferred housing target has been informed by both its own housing needs and the extent of unmet needs arising from the Greater Birmingham Housing Market Area (GBHMA), within which South Staffordshire sits. In particular, recently adopted plans and local evidence suggest that there is a 37,900 home shortfall arising from the Birmingham Development Plan. There is also an approximate 17,300 dwelling shortfall set out in the latest

Black Country Urban Capacity Review 2018, which offers the most up-to-date account of the Black Country's non-Green Belt housing capacity. It is also important to note the 60,855 dwelling shortfall up to 2036 established in the Greater Birmingham Housing Market Area Strategic Growth Study 2018. The study indicated the shortfall could only be reduced by 13,000 dwellings even if densities were increased across the GBHMA.

- 5.11 In light of the acuteness and intensity of these housing shortfalls and the need to deliver a sustainable pattern of development, the Council feels it is right to continue to test a contribution of up to 4,000 dwellings towards the unmet needs of the wider GBHMA. It is highly likely that this will require some degree of Green Belt release within the district. This is supported by the conclusions of the Council's Site Allocations Document (SAD) 2018, which, after examination by the Planning Inspectorate, concluded that a further joint Green Belt Review must be undertaken with the Black Country authorities to inform the Local Plan Review<sup>5</sup>. Equally, if the Council pursued what it considers to be an unsustainable and potentially undeliverable Open Countryside-led strategy (Spatial Option A), it is unlikely that even this approach would be able to deliver sufficient dwellings to meet its own needs and to make a contribution of up to 4,000 dwellings towards the GBHMA's unmet needs. The Council has ensured that all growth options assume that non-Green Belt sites in existing settlements and safeguarded land are released at an average density of 35 dwellings per hectare, thereby ensuring the need for further Green Belt release is kept to a minimum.
- 5.12 In light of these factors, the Council's current position is that further Green Belt release will likely be required in the District in order to ensure the District provides enough homes for both its own needs and a proportionate contribution to the unmet needs of the GBHMA. If significant steps are made to reduce this wider housing shortfall across the GBHMA, the Council will revisit this position to ensure that it does not unnecessarily release Green Belt land in South Staffordshire in pursuit of a housing target that may be better met elsewhere within the GBHMA.
- 5.13 The Council is not yet at the stage of assessing specific site proposals for housing allocations to deliver this target. However, this consultation does propose a potential indicative distribution of housing growth across the district to help shape site assessment and consultation with local communities, stakeholders and infrastructure providers. This includes specifying indicative levels of housing growth (and therefore potential land release) in some of the district's Green Belt villages and Green Belt areas adjacent to the neighbouring towns and cities of the Black Country. In evaluating the potential areas of search for further land release, the Council has considered both the potential harm to the Green Belt of releasing land in such locations and the wider planning and sustainability merits of delivering additional homes in this manner, as set out earlier in this document and in the Sustainability Appraisal. The full extent of Green Belt harm that would result from specific sites and the relative merits of those sites will be considered in full through site assessments in the Preferred Options Plan.

### **Areas of search for urban extensions adjacent to Wolverhampton, Walsall and Dudley**

- 5.14 The Council's preferred infrastructure led approach includes the following three areas of search for significant urban extensions, which are all adjacent to the towns and cities of the Black Country:

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<sup>5</sup> Site Allocations Document 2018 - Policy SAD1: Local Plan Review

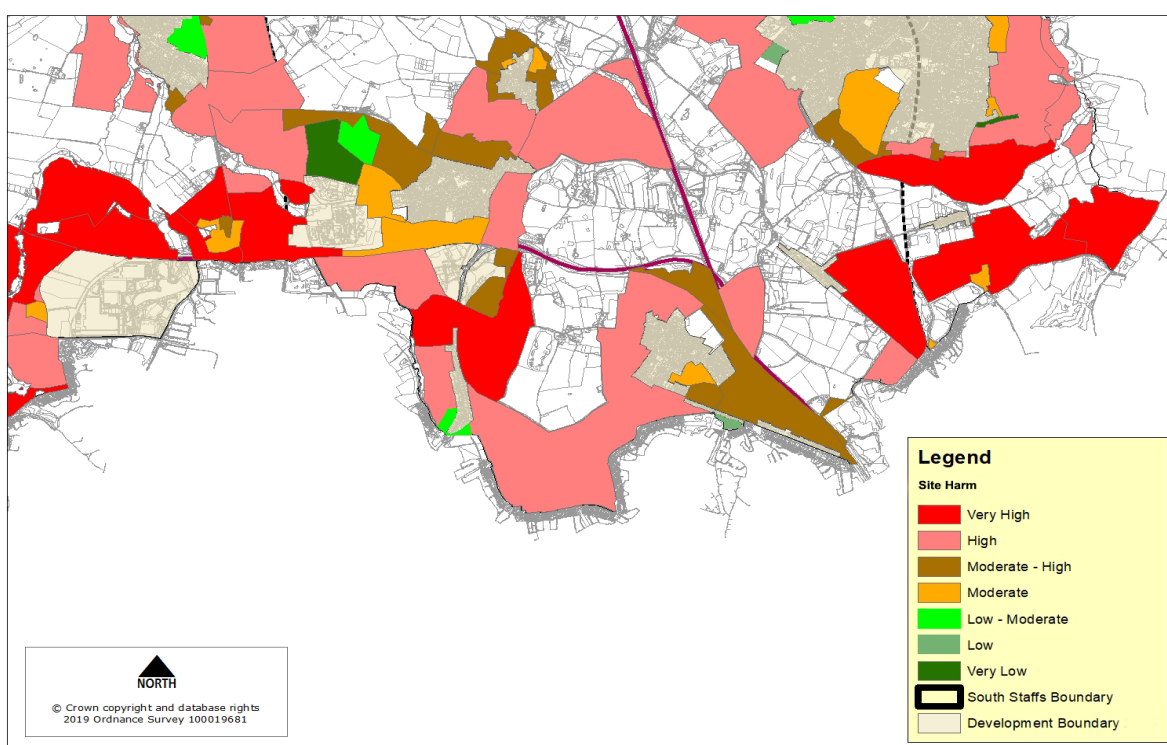
- employment-led development west of ROF Featherstone (13.5% of the housing target)
- a sustainable urban extension north of the Black Country (13.5% of the housing target)
- dispersed housing growth west of the Black Country (8.5% of the housing target)

5.15 The South Staffordshire Green Belt Study 2019 confirms that the potential areas of land release which would cause the greatest harm to the Green Belt are broadly concentrated in areas adjacent to neighbouring towns and cities outside of the district. Therefore, the Council has given careful consideration to the potential harm to the Green Belt that could result if urban extensions were identified in these locations in deciding upon the strategy to be pursued.

5.16 The employment-led development to deliver the unique infrastructure opportunities west of ROF Featherstone closely aligns to an area of ‘very high’ harm Green Belt, as identified in the Green Belt Study 2019. The Council still considers it is appropriate to examine this area in further detail through the site selection process, due to the unique infrastructure benefits it offers in comparison to other strategic options. These include the potential for this area to assist in the delivery of a longstanding undelivered brownfield strategic employment site whilst exploring opportunities to deliver the Council’s long-held ambition for a park and ride facility in the area as shown in the adopted Core Strategy.

5.17 The other two potential areas for urban extensions relate to the Black Country’s northern and western edges. The areas of Green Belt that enclose the Black Country towns and cities in these areas vary in degrees of harm, with only specific areas highlighted as being ‘very high harm’ in the South Staffordshire Green Belt Study 2019. These areas of highest harm are set out in the maps below.

**Figure 2: Green Belt Ratings – North of Black Country**



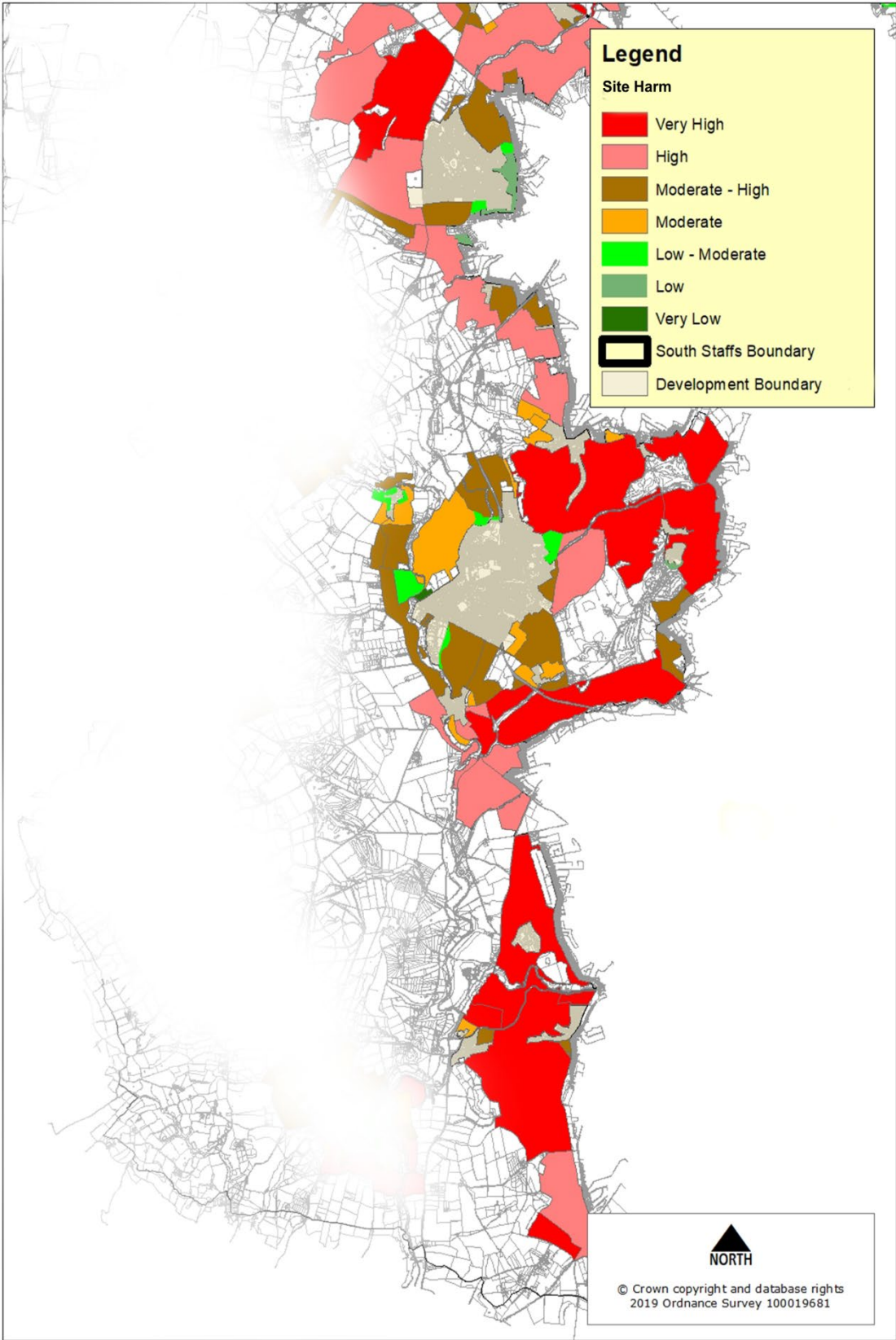


Figure 3: Green Belt Ratings – West of Black Country



- 5.18 The above maps show that there is potential land to accommodate urban extensions to the north and west of the Black Country without releasing land that would cause ‘very high harm’ to the Green Belt. **The Council has not yet made any decisions about which sites to allocate in Green Belt locations.** However, with the exception of land opportunities to deliver ROF Featherstone where unique opportunities may outweigh Green Belt harm, the preferred spatial strategy does not require the release of land which would result in very high harm to the Green Belt. The process of selecting sites will require a balanced consideration of a number of factors, including Green Belt harm, and the extent to which this can be avoided or reduced. These wider considerations are set out in the site selection criteria in Appendix 6.

**Question 5:**

**Do you agree that the 7 Spatial Housing Options are appropriate options to consider? Are there any alternative options we have not considered?**

**Question 6:**

**Do you agree that Spatial Housing Option G is a robust approach to meet needs in the district and to make a contribution towards unmet needs in the GBHMA?**

**Question 7:**

**Do you agree that we should continue to explore options for a new settlement?**

**Question 8:**

**What other information (if any) should we consider before concluding that Green Belt release is justified?**

**Question 9:**

**Have we identified the key criteria for the identification of sites (as set out in Appendix 6)? Are there any other factors we should consider?**

**Question 10:**

**Do you agree that, when selecting sites to deliver the preferred spatial housing strategy, the Council should seek to avoid allocating housing sites that would result in very high Green Belt harm wherever possible?**

## Appendix 1: Full list of questions

### Chapter 3.

**Question 1:**

**Do you agree that the evidence base used to inform Spatial Housing Options is robust and proportionate? If not, what else should we consider?**

### Chapter 4.

**Question 2:**

**Do you agree that taking account of housing land supply from the start of the new plan period (1 April 2018) is the correct approach?**

**Question 3:**

**Do you agree that all Safeguarded Land identified in the SAD should be released as a priority and should be delivered at an average density of 35 dwelling per hectare?**

**Question 4:**

**Are there any other options we should consider?**

### Chapter 5.

**Question 5:**

**Do you agree that the 7 Spatial Housing Options set out above are appropriate options to consider? Are there any alternative options we have not considered?**

**Question 6:**

**Do you agree that Spatial Housing Option G is a robust approach to meet needs in the district and to make a contribution towards unmet needs in the GBHMA?**

**Question 7:**

**Do you agree that we should continue to explore options for a new settlement?**

**Question 8:**

**What other information (if any) should we consider before concluding that Green Belt release is justified?**

**Question 9:**

**Have we identified the key criteria for the identification of sites (as set out in Appendix 6)? Are there any other factors we should consider?**

**Question 10:**

**Do you agree that, when selecting sites to deliver the preferred spatial housing strategy, the Council should seek to avoid allocating housing sites that would result in very high Green Belt harm wherever possible?**

## 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.

### **Greater Birmingham Housing Market Area**

A geographical area comprising 14 local authorities which functions as a single housing market.

**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.



**South Staffordshire Council**

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