



South Staffordshire Council

Local Plan Preferred Options

November 2021



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



A New Development Strategy for South Staffordshire 2018-2038

The Local Plan Review

Preferred Options

November 2021

Foreword

It is vitally important that we set a planning framework for the future of South Staffordshire to provide much needed housing and employment for our growing population. We know that our residents care about the communities in which they live and want to help shape our villages for future generations.

Members have driven the development of the new Local Plan for South Staffordshire and we are now consulting on the Preferred Options stage. The Preferred Options sets out sites for housing and employment and for pitches for our Gypsy and Traveller community. The plan will cover the period from 2018 up to 2038 and aims to provide for the needs of our own residents here in South Staffordshire, and some housing for our neighbouring authorities under our legal Duty to Cooperate.

This consultation sets out preferred sites based on robust planning evidence with infrastructure at its heart. We know that there are significant challenges in meeting national requirements, and providing new homes for our local communities, whilst protecting our Green Belt wherever possible.

The Government is pressing all planning authorities to make good progress with Local Plans, in advance of possible reforms to the planning system, and we need to have ours in place by 2023. Although this is a very important stage of consultation, changes can still be made to the plan and there will be a further consultation next year.

Your views can help us to shape the future of South Staffordshire and means we can build on our strong track record of providing affordable homes and jobs and will bring about new or improved local services and facilities and public open spaces.

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



Councillor Terry Mason
Cabinet Member for Planning and Business Enterprise

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1. Introduction

What is the Local Plan?

- 1.1 All planning authorities have a strategic plan which provides a framework for the future planning of their area. This is known as a Local Plan and it provides the blueprint for future development in the district. South Staffordshire's current adopted Local Plan consists of two documents, which are:
- **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, 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 Site Allocations Document (SAD) commits South Staffordshire to carrying out an early review of the Local Plan 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. Following an update of the Council's Local Development Scheme, we will look to submit a reviewed Local Plan by the end of 2022. The plan period for the new Local Plan will be 2018-2038.
- 1.3 The planning system has seen significant changes since the Core Strategy was adopted in 2012, with substantial amendments to national planning policy and the requirements for Local Plans. Therefore, an early review of the Local Plan is essential to respond to these Government requirements. We are reviewing the existing planning policy documents and refreshing our evidence base to inform policies and proposals in the new South Staffordshire Local Plan, which will identify the development needed in the district up until 2038. In particular, the new Local Plan will need to respond to 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 requirements to work together with neighbouring areas to meet their development 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 2038. This will include residential (including Gypsy, Traveller and Travelling Showpeople accommodation) 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 continue where they are still assessed as suitable. 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 future consideration to meet some of the development needs in this Local Plan.

- 1.6 The new Local Plan will also set out policies which will guide the determination of planning applications (see Chapter 6). These policies are likely to cover the same issues as those in the existing Local Plan such as promoting sustainable development, protecting and providing open spaces, design quality and protecting and enhancing the natural and historic environment. However, consideration will need to be given to what changes have taken place to national policy and how we respond to these locally.
- 1.7 It is important that we have an up-to-date Local Plan and enough land to meet our housing requirements for a rolling 5 year timeframe. Without this, South Staffordshire will be vulnerable to speculative planning applications, resulting in a piecemeal approach to new development and potentially sites that do not relate well to existing settlements.

The Local Plan in tackling Climate Change

- 1.8 Climate change has been recognised internationally as the most important environmental challenge that we currently face and has a direct impact on the Council's activities and how we meet the needs of all residents in the district. The Council has declared a climate emergency and following on from this has prepared a Climate Change Strategy that sets out our commitment to local action on climate change. One of the key strands of the Council's Climate Change Strategy relates to our strategic planning responsibilities and sets out how we will use the planning system and the new Local Plan as a vehicle to encourage sustainable patterns of development, promoting carbon resilient design, and protecting the natural environment.
- 1.9 National planning policy is also placing much greater emphasis on the role of the planning system in tackling climate change with the latest NPPF (2021) placing climate change, and mitigating its impacts, front and centre when setting out what the presumption in favour of sustainable development means for plan making. In addition, the recently published National Model Design Guide makes it clear the use of natural features in scheme design can play a part in mitigating climate change. It is clear that the use of features such as tree lined streets can have multiple benefits, not only relating to climate change, but also improving the appearance and the ecological value of developments.
- 1.10 Given this, it is critical that the new Local Plan provides greater ambition and measures for mitigating and adapting to climate change than previous Local Plans. As a result, climate change measures will be a consistent thread that will run through the plan. This goes beyond the more obvious climate change policies relating to renewable energy generation and energy efficiency measures for new buildings. The overall spatial strategy in focusing greater levels of development in the larger villages and urban edge locations with greater access to facilities and public transport, thus reducing car dependency, is key to achieving sustainable development and tackling climate change. A plethora of other policies relating to open space provision, design (including a requirement for tree lined streets), parking standards (and requirement for electric vehicle charging points), sustainable transport/active travel measures, biodiversity net gain, Green Belt compensatory measures and reducing flood risk will all play their part as a package of environmentally focused policies.

Will the new Local Plan affect me?

- 1.11 The Local Plan will result in new development. Following on from the Issues and Options consultation in 2018 and Spatial Housing Strategy and Infrastructure Delivery consultation in 2019, this new Preferred Options consultation proposes how future development will be distributed across the district and on which sites. This is based on the evidence we have gathered to date, comments made to previous consultations, site assessments and sustainability, land that we know is available and taking on board the requirements of national planning policy and guidance.
- 1.12 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?

- 1.13 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 both documents in the existing Local Plan.

The plan making process

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

Main Stages		Date
Evidence Gathering	<ul style="list-style-type: none"> • Identification of main planning issues for the district. • Development of Strategy Options • Call for Sites • SHMA • Sustainability Appraisal (SA) Scoping Report 	2016-present
Issues and Options	<ul style="list-style-type: none"> • Public consultation on whether the correct issues were identified and potential strategies and policies to meet different development needs • Additional Call for Sites • Initial Sustainability Appraisal (SA) Report 	October 2018
Spatial Housing Strategy & Infrastructure Delivery Consultation	<ul style="list-style-type: none"> • Public consultation on strategic approach to new housing development, including broad locations but not specific sites • SA of spatial growth options 	October 2019
Preferred Options Plan	<p>WHERE WE ARE NOW</p> <ul style="list-style-type: none"> • Public consultation on the Council's preferred options for sites and policy direction of travel • Draft SA Report 	November 2021
Publication Plan	<ul style="list-style-type: none"> • Sets out the final Local Plan for submission to the Secretary of State (SoS)/Government • Public consultation on legal compliance and 'soundness' • Final draft SA Report 	Summer 2022
Submission and Examination	<ul style="list-style-type: none"> • Local Plan submitted to Government (Planning Inspectorate) with all the comments received during the Publication Plan consultation • Independent Examination carried out in public by a Planning Inspector • Final SA Report 	Winter 2022
Adoption	<ul style="list-style-type: none"> • Council formally adopts Local Plan • SA Adoption Statement 	Estimated Winter 2023
Monitoring and Review	<ul style="list-style-type: none"> • Each year, identified targets and planning applications are monitored to assess delivery of the Local Plan 	Ongoing

Table 1: Stages of Plan-making

Issues and Options 2018

- 1.15 The [Issues and Options](#) in October 2018 was the first consultation on the new Local Plan and sought views on the appropriate level of growth to plan for and high-level scoping options for where new growth could be located. Development Management policy options covering issues such as affordable housing, climate change mitigation and sustainable transport were also consulted on, with the preferred policy options covering the different policy areas set out in Chapter 6 of this document.

Spatial Housing Strategy and Infrastructure Delivery 2019

- 1.16 In October 2019 the [Spatial Housing Strategy and Infrastructure Delivery](#) (SHSID) consultation set out the Council's preferred spatial strategy for distributing growth. This proposed a level of housing development that would meet South Staffordshire's housing needs plus a 4000-home contribution towards to unmet needs of the wider Greater Birmingham Housing Market Area (GBHMA). The Council's preferred spatial option for distributing growth was Option G – which proposed infrastructure-led development with a garden village area of search beyond the plan period. The preferred spatial option was not site specific and sought to focus growth on large strategic sites that would deliver new and improved infrastructure, including in areas near to the source of unmet housing needs in the Black Country; as well as limited growth in smaller villages to ensure the Council's requirement for delivering 10% of homes on small sites is met. In addition, 6 reasonable alternative options for distributing growth were consulted on in the SHSID.

Preferred Options Consultation

- 1.17 We are currently consulting on the Preferred Options which is the third stage of public consultation, following on from the Issues and Options consultation in 2018 and the Spatial Housing Strategy and Infrastructure Delivery Consultation in 2019. This builds upon these consultations, taking on board all representations received in arriving at an amended infrastructure led strategy. This consultation sets out the proposed site allocations to meet the preferred strategy and we are seeking views on these, including what additional infrastructure sites may require, or be able to realise. It also seeks feedback on fully drafted Development Strategy and site-specific policies and sets out our direction of travel for Development Management policies, such as the percentage of affordable housing we would require on future development sites, and asks for views on these.

Making comments

- 1.18 We welcome your comments on our proposals. This document sets out a series of questions to guide responses. These are spread through the document in each section, although a full list of questions can be found in Appendix G.
- 1.19 A Glossary 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.
- 1.20 Following the close of the Preferred Options consultation, all responses will be considered and summarised in general terms to inform the preparation of the Publication Plan which we will consult on in summer 2022. The Publication Plan will be the final draft plan that we consult on before submitting the plan for independent examination.

How to respond

- 1.21 We want as many people as possible to be involved in the preparation of the new Local Plan. The Preferred Options consultation will take place from **1 November until 5pm on 13th December 2021**. All comments must be made in writing by the consultation deadline in order for us to take them into account.
- 1.22 The quickest and easiest way to make your comments on our proposals is via our online consultation system that will enable you to make your comments direct. You will be able to manage your account and response and see details of other responses when they are published. It's very simple, all you need is your email address to register here: <https://sstaffs.oc2.uk/login>.
- 1.23 If you made comments on previous consultations and we have your email address, it will already be on the system. Just put your email address in the Login and click 'I forgot my password'. You will then be sent an email and you can set your own password and start making comments as soon as the consultation is live.

Data protection

- 1.24 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.
- 1.25 Officers of the Strategic Planning Team and other officers within the Council may receive/process your personal data where it is appropriate to do so. For more information about how we process this data see: <https://www.sstaffs.gov.uk/planning/strategic-planning--data-protection.cfm>

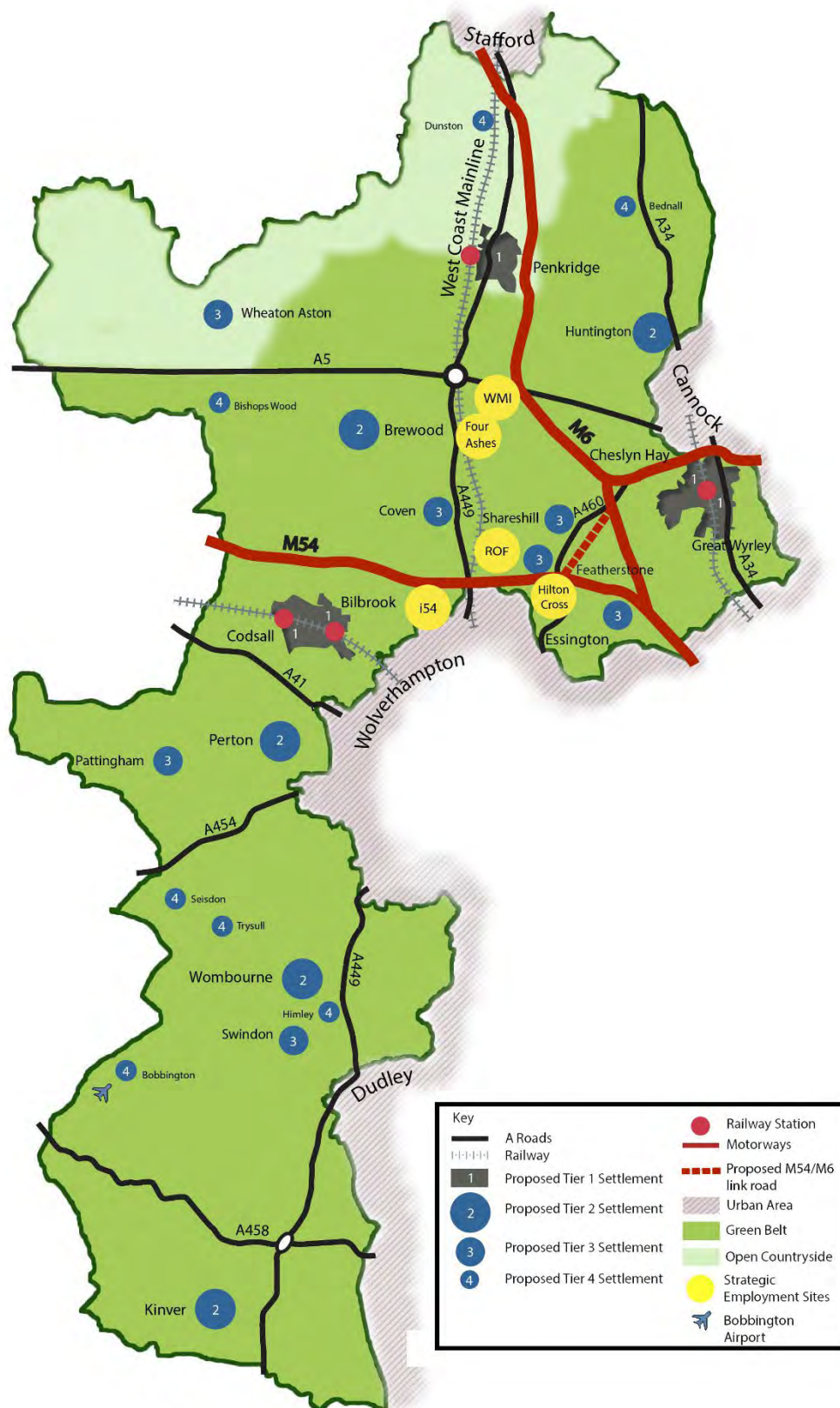
2. South Staffordshire: Setting the scene

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



- 2.2 South Staffordshire is the southernmost of the nine Staffordshire authorities in the County. The district adjoins the Major Urban Area of the West Midlands Conurbation including the Black Country boroughs of Dudley, Walsall and the City of Wolverhampton. The district also shares its boundaries with Shropshire and Telford to the west and Stafford to the north, with the County of Worcestershire to the south.

- 2.3 South Staffordshire has a rich legacy of historic villages, buildings and landscapes with conservation areas, historic parklands and gardens, and buildings of local importance. These define the local identity and distinctive character of the historic environment of the district. The varied landscapes in the district are also home to a rich biodiversity resource providing many types of habitats including areas of international, national and local nature conservation importance.
- 2.4 South Staffordshire has historically proven to be an attractive location for people to live. It has been a destination for people moving from the West Midlands major urban area and other nearby towns. Pressure for housing growth over and above the needs arising purely from within the district has continued.
- 2.5 South Staffordshire is made up of 27 parishes with a dispersed and diverse settlement pattern of villages ranging from small hamlets to large villages with over 14,000 residents, each with their own distinctive character set in attractive countryside. The district has no cities or towns and no single dominant settlement.
- 2.6 Larger villages such as Bilbrook, Brewood, Cheslyn Hay, Codsall, Great Wyrley, Kinver, Penkridge, Perton and Wombourne contain a wide range of community facilities and services. These include libraries, sport and recreation including leisure centres, shopping, commercial and employment areas and serve the smaller outlying villages and hamlets. However, local residents rely on the services provided within towns and cities outside of the district to meet some of their higher order needs, such as hospitals, certain types of retail needs and employment opportunities.
- 2.7 Due to the nature of the district and the dispersed settlement pattern a settlement hierarchy approach has been devised to reflect the level of service provision at each settlement. This has been informed by the Council's Rural Services and Facilities Audit (RSFA) 2021. The RSFA does not specifically determine how much growth should be attributed to settlements but does offer a guide by helping determine their relative level of sustainability, and as such, their potential suitability for accommodating additional growth. Tier 1 villages are assessed as having the greatest access to services and facilities relative to other settlements, with Tier 4 settlements the lowest. The proposed settlement hierarchy is detailed on the context map below.



Map 1: South Staffordshire context map and proposed settlement hierarchy

3. What does the Local Plan need to consider?

National context

National requirements for plan-making

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

Neighbourhood Planning

- 3.5 South Staffordshire does not currently have any adopted Neighbourhood Plans in its area; however Kinver, Codsall and Bilbrook Parishes have been designated Neighbourhood Plan areas and are currently undertaking scoping with a view to preparing Neighbourhood Plans. The role of Neighbourhood Plans is to promote a shared vision and identify local policies for the neighbourhood area, rather than strategic policies. Crucially, neighbourhood plans must be in general conformity with the area's strategic policies and cannot provide for less development than is set out in the Local Plan. Where a Neighbourhood Plan has been produced, then the local policies in it would take precedence over the local policies in the Local Plan if the Neighbourhood Plan has been adopted more recently.

Cross boundary Issues and the Duty to Cooperate

- 3.6 Local Planning Authorities have a legal duty to cooperate with neighbouring authorities and other prescribed bodies on strategic matters that cross administrative boundaries. Strategic matters can include housing, employment, infrastructure and the Green Belt. The Council has been working collaboratively with neighbouring authorities on cross boundary issues for a number of years. A clear example of this is how unmet employment needs from the Black Country helped support new employment allocations at i54 and ROF Featherstone in the adopted Site Allocations Document (SAD). Unmet housing need across the Greater Birmingham Housing Market Area (GBHMA) is a key cross boundary issue that will need to be addressed with neighbouring authorities (including South Staffordshire's role in meeting a proportion of the shortfall) through plan preparation.
- 3.7 The NPPF presumption in favour of sustainable development makes it explicit that authorities should plan for their own objectively assessed needs for housing and other development, as well as any needs that cannot be met in neighbouring areas. Agreement through Statements of Common Ground are now a necessity and will document the cross-boundary matters that need to be addressed and what progress has been made in dealing with them.

Evidence base

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

Question 1:

Do you agree that the evidence base set out in Appendix A is appropriate to inform the new Local Plan? Yes/No

Please provide comments on the content or use of the evidence base set out in Appendix A, referencing the document you are referring to.

- 3.9 A number of the studies are iterative which means that an updated version will sit alongside each stage of the Local Plan. These are discussed in further detail below.

Sustainability Appraisal (SA)

- 3.10 The Local Plan must contribute to achieving sustainable development, aiming to achieve a better quality of life for all, now and for future generations. A Sustainability Appraisal (SA) is a statutory requirement which ensures that the environmental, social and economic effects of a plan and reasonable alternatives to the plan are being considered. A separate SA is prepared

to appraise proposals at each stage of Local Plan preparation, and will also be subject to consultation. The SA will assess the sustainability of the strategic approach, proposed allocations and reasonable alternatives, and the content of the policies contained in the plan. The SA findings will be used to help refine policy choices and site options through to the final proposals set out in the Local Plan that is submitted for examination.

Habitats Regulation Assessment (HRA)

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

Infrastructure Delivery Plan

- 3.15 A refreshed infrastructure Delivery Plan (IDP) will be prepared to support the new Local Plan to ensure the required infrastructure and investment needed to deliver the plan effectively is identified. The IDP will include the specific infrastructure projects needed to deliver planned growth and will be updated as the plan progresses, following consultation with infrastructure providers, residents and Members. An initial IDP (October 2018) was produced that identifies the district's baseline infrastructure requirements including:
- A summary of current infrastructure provision
 - Infrastructure projects underway or scheduled
 - Known infrastructure deficiencies
- 3.16 Since then, updated versions of the IDP have been produced including the most recent version that sits alongside this Preferred Options document. This includes details of infrastructure that it is proposed the new plan will deliver. Details of these infrastructure projects, including delivery mechanisms, will be refined and expanded on in an updated IDP to be published alongside the Publication consultation, following further engagement with infrastructure providers. We welcome your comments on additional infrastructure opportunities that new sites could deliver.

Question 2:

- (a) Do you agree that the correct infrastructure to be delivered alongside proposed site allocations been identified in the IDP? Yes/No
- (b) Is there any other infrastructure not covered in this consultation document or the IDP that the Local Plan should seek to deliver? Yes/No

Issues and challenges for South Staffordshire

3.17 Community engagement at the Issues and Options consultation stage confirmed a number of issues and challenges in South Staffordshire that should be addressed by the new Local Plan and are set out in Table 3-5. These issues and challenges are informed by the SWOT analysis in Table 2 below:

Strengths	Weaknesses
<ul style="list-style-type: none"> • Natural assets including natural green spaces, parks and gardens and designated wildlife sites • Built assets including attractive characterful villages, listed buildings, conservation areas and tourist attractions • Very well served (particularly in the north) by national railway and highway transport corridors, with good access to nearby major conurbations. • Low levels of unemployment • High life expectancy for residents 	<ul style="list-style-type: none"> • Demographic imbalance with higher than average proportion of residents aged 65+, and a projected decline in families and working age residents, with resultant threat to some service provision • Reliance on neighbouring areas for higher order services and a dependency on their economic health for access to employment • Poor public transport connectivity in parts of the district
Opportunities	Threats
<ul style="list-style-type: none"> • Continued development of the strategic employment sites including at i54 South Staffordshire, ROF Featherstone and West Midlands Interchange leading to greater inward investment and prosperity. • Plan positively to meet future housing needs in a way that improves infrastructure, services and facilities for existing and new households. • Build on the tourism offer of the built and natural environment • Enhance the natural environment through sympathetic new development and by measures such as biodiversity net gain and green belt compensatory measures. • Role in meeting cross boundary unmet needs and opportunities to masterplan strategic site allocations creating sustainable new communities 	<ul style="list-style-type: none"> • Increasing pressure for development on land within the Green Belt to meet our own housing needs and the needs of adjoining areas, which if not properly managed, could threaten the quality and character of the district • Lack of available brownfield land in the district • A concentration of large scale developments, such as the West Midland Interchange (WMI) strategic rail freight interchange, poses a threat to the district in terms of the cumulative impact on the surrounding infrastructure

Table 2: SWOT analysis

Homes and Communities - Issues and Challenges

Issue / Challenge	Explanation
Level of growth needed to meet South Staffordshire's housing needs and make an appropriate contribution towards the wider housing market area.	<ul style="list-style-type: none"> • South Staffordshire is within Greater Birmingham Housing Market Area (GBHMA), which comprises of fourteen diverse local authorities, including Birmingham and the four Black Country authorities. • South Staffordshire's objectively assessed housing need (OAN) is currently 243 dwellings per annum. • Through the Duty to Cooperate, South Staffordshire should consider its role in providing additional homes to meet needs of GBHMA through a Statement of Common Ground. • Pressure on South Staffordshire to release land for housing in the Open Countryside and outside the Green Belt will be particularly acute.
Levels of growth needed to meet South Staffordshire's Gypsy and Traveller needs.	<ul style="list-style-type: none"> • Need to provide additional Gypsy and Traveller pitches to meet as far as possible the need identified in the GTAA 2021 and Pitch Deliverability Study 2021. • Gypsy and Traveller sites within the district are often in rural locations, with a large proportion concentrated in north of district close to the strategic transport network. • Existing sites privately owned and located in Green Belt. Strong preference for permanent residential pitches over new public sites from the traveller community. • Principle issues for meeting pitch needs include delivering new pitches in the right location for the right people, having regard to existing sites and family need, and recognising the constraints that impact the district.
Delivering a variety of homes, to meet the needs of all groups of the community and better balance the local housing market.	<ul style="list-style-type: none"> • Currently, there is a mismatch between existing stock and future housing needs. • Providing smaller residential units for young families and older people wishing to downsize will free up family sized accommodation elsewhere in community. • The latest Strategic Housing Market Assessment (SHMA) 2021 considers the type of housing and mix of tenures needed and will guide policies to support an appropriate mix of market and affordable housing.
Meeting the housing needs of the ageing population and providing specialist housing.	<ul style="list-style-type: none"> • District has an increasingly ageing population, considerably higher than the national average. • Major challenge in meeting needs of older people includes development of new and improved services, and the provision of right mix of specialist housing, including bungalows. • The Local Plan will need to support the provision of specialist housing requirements of other groups, such as those with disabilities.
Delivering affordable housing to meet local needs.	<ul style="list-style-type: none"> • House prices in the district have increased, with villages attracting those who are prepared to travel to work in nearby major urban areas. The ratio of house prices to incomes is high in regional terms. • Challenge of maintaining adequate and suitable supply of affordable housing for those on low incomes and first-time buyers.

	<ul style="list-style-type: none"> • A significant proportion of affordable housing is delivered through development contributions via Section 106 agreements.
Delivering decent homes of a high-quality design that reflect and maintain the local distinctiveness, character and quality of the countryside and villages.	<ul style="list-style-type: none"> • Key challenge of providing a variety of well-designed homes through working with a variety of small and large housebuilders, meeting need for Self and Custom Build Housing, working with Registered Providers (RP) and adopting flexible approach to conversions and reallocation of undelivered sites. • Cost effective design measures can be undertaken to create well designed, energy efficient homes with appropriate levels of internal and external space which leads to wider health and wellbeing benefits for residents. • Use of masterplans and design codes to provide a framework for creating beautiful sustainable developments.
Ensuring access to a good range of health services as well as sport, leisure and recreational facilities, making a positive contribution to health and wellbeing of residents.	<ul style="list-style-type: none"> • Issues include obesity affecting some areas of the district, and only just over half of South Staffordshire adults meet recommended levels of physical activity. • One in four adults are physically inactive in the district, similar to the national average. • Planning has an important role in facilitating healthy lifestyles changes, such as encouraging exercise. • Sport, leisure, and recreational facilities should be accessible to residents and suitable quality to be attractive to users. • Active travel, such as cycling and walking should be facilitated through scheme design and off-site financial contributions. • Key challenge is ensuring sufficient access to GP/health centres to accommodate residents from new developments.
Meeting the needs of children and young people, including the provision of good education and play spaces.	<ul style="list-style-type: none"> • Issue of ensuring new developments incorporate play provision that parents and children in existing communities can access. • Education attainment in South Staffordshire for GCSEs is similar to England average however there are inequalities in attainment levels within the district. • Key challenge of ensuring there is adequate school provision to accommodate increased pupil numbers due to new development.
Reduction of crime and anti-social behaviour and fear of crime.	<ul style="list-style-type: none"> • Planning for new development should include measures that limit crime and deter anti-social behaviour therefore promotion of natural surveillance and feeling of security for residents important.

Table 3: Homes & Communities – issues and challenges

Economic Vibrancy - Issues and Challenges

Issue / Challenge	Explanation
Levels and types of growth needed to meet South Staffordshire's employment land needs and ensuring that local people have good access to a range of employment opportunities.	<ul style="list-style-type: none"> • South Staffordshire is an attractive location for commercial development with a diverse range of small, medium, and large businesses and firms. • Key challenge of providing a mixed portfolio of employment in terms of quality, size and use classes. • Retaining existing businesses, diversifying the economy, creating more skilled jobs and increasing the retention of young, educated residents will strengthen the local economy and see local people have access to a range of employment opportunities.

	<ul style="list-style-type: none"> EDNA (2018) identifies a small oversupply to meet South Staffordshire's own employment need but identifies potential role in meeting unmet needs of neighbouring authorities.
Supporting the economies of adjoining areas and pressure to release land to meet a proportion of their unmet employment needs.	<ul style="list-style-type: none"> Significant proportion of South Staffordshire's population travels to work outside the district. The Black Country and other adjoining authorities' economies are an important source of employment for residents and an important factor in the prosperity of the district. Over recent years South Staffordshire has aspired to provide more local jobs, reduce levels of out commuting and provide employment for our residents and those of neighbouring areas, such as i54 South Staffordshire. South Staffordshire EDNA (2018) identifies South Staffordshire as being in the same FEMA (Functional Economic Market Area) as Cannock Chase district, Dudley, Walsall and Wolverhampton. The Black Country authorities have a significant unmet need for employment land in their forthcoming plan period. As South Staffordshire is in the same FEMA as three of the Black Country authorities the Local Plan needs to consider South Staffordshire's role in meeting any cross boundary needs.
Supporting the aims and ambitions of the Staffordshire and Stoke-on-Trent Local Enterprise Partnership (SSLEP).	<ul style="list-style-type: none"> Including expansion in large and small businesses in a number of priority sectors. Incorporates development of advanced manufacturing industries in aerospace and automobile sectors and capitalising on supply chain opportunities from global businesses such as Jaguar Land Rover.
Managing the impact of West Midlands Interchange (WMI).	<ul style="list-style-type: none"> Ensuring a policy framework is in place to manage the local environmental impacts and pressure on local infrastructure as effectively as possible.
Supporting our existing employment sites, including strategic sites at i54 South Staffordshire, ROF Featherstone, Hilton Cross, Four Ashes and West Midlands Interchange.	<ul style="list-style-type: none"> Safeguarding delivery of strategic employment sites which provide important job opportunities for residents of South Staffordshire and neighbouring areas. Inward investment opportunities should be fully harnessed at the strategic sites, including opportunities for further expansion of the sites where appropriate and feasible.
Supporting higher education attainment, the development of skills and access to training and employment opportunities	<ul style="list-style-type: none"> District relatively prosperous – the number of those employed within the top 3 professional and managerial sectors exceeding national average and the number of adults with no qualifications below national average. There are pockets of deprivation within district with higher levels of unemployment. Supporting development of skills, access to education and local training opportunities are key issues for Local Plan to ensure residents can benefit from economic growth.
Provide opportunities for sustainable rural economic growth whilst protecting the environment, including	<ul style="list-style-type: none"> Need to diversify the rural economy whilst enabling farmers to continue to manage the rural landscape. Farm complexes can offer scope for alternative local employment uses for residents that support the rural economy and reduce the need for travel.

supporting farm diversification and tourism.	<ul style="list-style-type: none"> • Conversions of agricultural buildings to employment uses, such as tourism, are preferred to conversions to residential uses, which may be less sustainable. • Need to proactively support and encourage improvement of tourist facilities and attractions to promote South Staffordshire as a place to visit and as a base to access a wide range of tourist attractions within the West Midlands and beyond.
Ensuring local people have access to retail and a good range of essential community facilities and services, supporting the continued role of village and neighbourhood centres as a focus for delivery of these.	<ul style="list-style-type: none"> • The larger villages in South Staffordshire contain a range of community facilities including retail centres, libraries, sport and recreation and serve smaller outlying villages and hamlets. • Local residents also rely on services provided within towns and cities outside of district to meet higher order needs. • Loss of facilities and services in smaller villages is an ongoing trend. • Protecting village shops and community facilities and providing accessible services to meet needs of all sectors of community are key priorities.
Ensuring impact on the road network is fully considered during plan-making.	<ul style="list-style-type: none"> • Important when considering growth options that impact on road network is fully considered and proposals limit impact on network and mitigation measures are secured where appropriate. • Understanding the effect of the M54/M6 link road
Ensuring provision of suitable public transport services with appropriate facilities (such as adequate parking) at transport hubs.	<ul style="list-style-type: none"> • Proximity to strategic road and rail links, particularly in north, connects the district to the West Midlands and beyond, attracting commuters and creating pressure on housing and employment is a key issue. • West Coast Main Line railway runs through Penkridge. • Rail services provided on Shrewsbury to Wolverhampton line, with stations at Codsall and Bilbrook. • Walsall to Rugeley line with station at Landywood (Great Wyrley). • Challenge for car and bicycle parking at all stations, with commuters parking on surrounding residential roads. • Parking an issue in some village centres for residents accessing shops and other services. • High level of car ownership and improving access to public and community transport for those without a car remains an issue. • Challenges around increasing cycle and footpath provision for leisure or commuting, including connecting to established routes. • Effective rural public transport services are key for ensuring people have sustainable access to facilities and employment opportunities inside and outside the district.
Improving access to suitable broadband and digital communication networks.	<ul style="list-style-type: none"> • Access to digital networks and high-speed broadband remains inconsistent. • Home working is becoming an increasing feature in rural areas, which has been further accelerated as an effect of the Covid-19 pandemic. • The expansion of broadband internet and other technologies are important to support sustainable forms of employment and will help encourage the development of small and medium sized enterprises (SMEs) in the district.

Table 4: Economic Vibrancy – issues and challenges

The Natural and Built Environment - Issues and Challenges

Issue/Challenge	Explanation
Protecting the Green Belt and understanding which areas of South Staffordshire's Green Belt make the most contribution to the five national purposes of the Green Belt.	<ul style="list-style-type: none"> • 80% of South Staffordshire is designated Green Belt. • When planning to meet housing needs, authorities should direct development away from Green Belt where possible. Where this is unavoidable, development should be located away from most sensitive areas of Green Belt subject to other planning factors such as sustainability and deliverability. • The Black Country and South Staffordshire's Green Belt Study is a key piece of evidence when considering this issue.
Protecting sensitive areas of Open Countryside beyond the Green Belt.	<ul style="list-style-type: none"> • Around 14% of district is Open Countryside. • Much of the character of countryside beyond Green Belt is of high landscape quality, ecological, historical, archaeological, agricultural and recreational value. • Protecting the most sensitive areas of Open Countryside is a key issue.
Understanding South Staffordshire's landscape character and areas sensitive to change.	<ul style="list-style-type: none"> • Landscape character and structure of South Staffordshire has changed significantly over time, including the removal of trees and hedgerows and increased agricultural activity. • Key issue for Local Plan of understanding landscape character and where possible, protecting the most sensitive areas.
Protecting, conserving and enhancing the district's rich natural environment and ecological assets	<ul style="list-style-type: none"> • Varied landscape in the district and home to a rich biodiversity of resource providing many types of habitats including Special Areas of Conservation (SACs), National Nature Reserve (NNR), Local Nature Reserves (LNRs), Sites of Biological Importance (SBIs) and Sites of Special Scientific Interest (SSSIs). • Western fringe of Cannock Chase AONB lies within the district and there is a statutory obligation to protect and manage the area. Within the AONB lies an area of lowland heath, protected by SAC status. • Agricultural land within the district ranges from best quality grade 1 down to grade 3b. The best and most versatile agricultural land is classified as grades 1 and 2. • Conserving and protecting valued finite resources is a key issue to consider when planning new development. • Hatherton Canal Restoration Project could contribute to tourism and flood risk alleviation.
Ensuring sufficient good quality public open spaces and green infrastructure is available for residents and visitors to the district.	<ul style="list-style-type: none"> • Extensive areas of attractive open land within the district for public recreational uses. • These public open spaces provide informal leisure opportunities as well as enjoyment of the natural environment. • Key challenge of conserving and protecting open space for use by generations to come.
Protecting and conserving the district's historic asset.	<ul style="list-style-type: none"> • Over 640 listed buildings and 19 Conservation Areas within the district with many other locally important buildings and structures. • The district's archaeological resource is rich and varied and includes scheduled ancient monuments.

	<ul style="list-style-type: none"> Ensuring development is sensitive to these irreplaceable assets and their settings and appropriate mitigation is applied where harm is unavoidable is a key challenge.
Planning for the impact of climate change and protecting existing and new communities from flood risk through flood resilience measures.	<ul style="list-style-type: none"> South Staffordshire Council declared a climate emergency in 2019. Major challenge of ensuring new development is sustainable, addressing the implications of climate change and the reduction of CO2 emissions, encouraging renewable energy and the promotion of energy efficiency. Challenge of ensuring a sufficient amount of electric vehicle charging points are provided throughout the district, with increased demand and in preparation for the 2030 ban on the sale of petrol and diesel cars. South Staffordshire is covered by two river catchments: Smestow Brook within the River Severn Catchment; and the River Penk is within the Trent catchment. Many additional tributaries flow into the main rivers contributing to the flood risk within the district. Penkridge, Wombourne and Kinver, and a number of other settlements are affected by fluvial flooding. Surface water flooding an issue in certain hotspots. The Lead Local Flood Authority identifies Brewood as a top 10 'rural' areas and Perton one of the top 10 'urban' areas with properties at risk from surface water and small water courses in Staffordshire. Key challenge in ensuring future growth does not exacerbate these issues and where possible can contribute to reduction in flood risk.

Table 5: Natural and Built Environment – issues and challenges

Vision and strategic objectives

- 3.48 Based on the issues and challenges outlined above, it is crucial that the Local Plan sets out a vision for the district to cover the plan period (2018-2038) and identifies clear objectives for aspects such as housing, infrastructure, economic growth and environmental protection. Collectively, the policies in the plan should help enable the strategic objectives to be achieved and to deliver the vision and strategic priorities for the district.

The vision - what will South Staffordshire be like in 2038?

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

3.49 Strategic objectives - to deliver the vision

Development Strategy
Strategic Objective 1: Protect the Green Belt and Open Countryside as far as possible, ensuring that where Green Belt release is necessary that mechanisms are in place to secure compensatory improvements to the environmental quality and accessibility of the remaining Green Belt.
Strategic Objective 2: Meet the housing needs of the district whilst making a proportionate contribution towards the unmet needs of Great Birmingham Housing Market Area. New development will be focused on sustainable locations within the district, either within or adjacent to the district's key villages or through urban extensions adjacent to neighbouring towns and cities.
Homes and Communities
Delivering the right homes
Strategic Objective 3: To provide housing to meet the needs of different groups of the community, including a good range of market and affordable housing of varying sizes and housing that meets the need of an ageing population and people with specialist housing needs.
Design and space standards
Strategic Objective 4: To develop a built environment that is of high-quality design respects the character of our existing settlements, reflects local vernacular and creates beautiful and sustainable places where people want to live, work and enjoy leisure activities.
Promoting successful and sustainable communities
Strategic Objective 5: To encourage healthy communities through the provision of good access to health and education infrastructure, open space, sport and leisure and children's play and youth development facilities.
Economic Vibrancy
Building a strong local economy
Strategic Objective 6: Develop an economic strategy that seeks to retain existing employment and fosters sustainable economic growth, encouraging inward investment and job creation in key sectors such as advanced manufacturing and providing the skills to enable residents to access these jobs.
Strategic Objective 7: Support the vitality of rural areas by enabling the sustainable growth and diversification of rural businesses, including supporting tourism and agriculture.
Community services, facilities and infrastructure
Strategic Objective 8: Protect and enhance sustainable village centres, retaining the existing retail offer and ensuring good access to community services and facilities.
Strategic Objective 9: Ensure that new development is served by appropriate infrastructure such as road improvements, health, recreation, and education facilities.
Strategic Objective 10: Support the development of sustainable transport network including ensuring that where possible existing and new development is well served by various public transport modes and active travel options such as walking and cycling.
The Natural and Built Environmental
Protecting and enhancing the natural environment
Strategic Objective 11: Protect and enhance the district's natural environment including the district's landscape character and key natural assets such as the Cannock Chase Special Area of Conservation, whilst ensuring that biodiversity net gain is delivered across the district.
Climate Change and sustainable development
Strategic Objective 12: Ensure that our communities are resilient and adaptable to the effects of climate change. Deliver appropriate climate change mitigation through renewable energy

generation and ensuring that developments are designed and located in a way that delivers greater energy conservation and reduces carbon emissions.

Enhancing the Historic Environment

Strategic Objective 13: Enhance the built environment, conserving and enhancing district's heritage assets including the district's canal network.

Table 6: Strategic Objectives

Question 3:

- a) Have the correct vision and strategic objectives been identified? Yes/No
- b) Do you agree that the draft policies (Chapters 4 and 5) and the policy directions (Chapter 6) will deliver these objectives? Yes/No

4. Development Strategy

Green Belt

- 4.1 The distinctive character of South Staffordshire is directly influenced by the fact that around 80% of the district is Green Belt. This contributes to the district's rural character and helps distinguish the district from neighbouring urban areas such as the Black Country. Protecting the Green Belt from unplanned development as far as possible is therefore a key objective (Strategic Objective 1) of the Local Plan. However, national policy requires us to balance the need to protect the Green Belt with the need to deliver a sustainable growth strategy that meets the district's development needs, including for new housing and employment.
- 4.2 Therefore, it is proposed that Green Belt is only released through the Local Plan where necessary and fully justified. In line with national policy, Green Belt boundaries can only be amended through the review of a Local Plan, and therefore a policy setting out where the Council's development strategy requires such Green Belt amendments is necessary, as well as ensuring a strong policy framework for resisting planning applications that would result in inappropriate development in the Green Belt.
- 4.3 Wherever possible, the Council has looked to allocate suitable brownfield sites to reduce pressure on the District's Green Belt, however these very are limited due to the largely rural nature of the district. Most large-scale site options on brownfield land are either in isolated rural locations or form part of the District's employment land supply and need to be retained to ensure the District can meet its employment land needs. Previous Local Plans also identified large brownfield sites in the Green Belt (known as major developed sites in the Green Belt) but all of these have now been developed. There is an area of brownfield land adjacent to the south-western edge of Wombourne, which is mainly occupied by the car storage company Copart. This site has been assessed as an option for housing, however it is not proposed for allocation due to Staffordshire County Council highways team concerns, as well as uncertainty over the relocation of the existing business. Elsewhere, brownfield opportunities in sustainable locations tend to be small scale (e.g housing association garage sites, small infill plots, changes of use under permitted development) and if unconstrained have historically come forward through the Development Management process and outside of the Local Plan, as the principle of such schemes is generally considered acceptable. The Council has included a windfall allowance for these smaller site opportunities within the housing trajectory to ensure this is accounted for in future supply.
- 4.4 Where Green Belt release is necessary through the Local Plan, we will ensure that compensatory improvements to the environmental quality and accessibility of remaining Green Belt, including improving access to the countryside and ecological and biodiversity enhancement, are made. In order to deliver the vision for the district over the plan period it essential that we have a strong policy position for protecting the Green Belt as far as possible and this is set out in Policy DS1 below.

Policy DS1 – Green Belt

Within the West Midlands Green Belt, as defined on the policies map, opportunities to enhance the beneficial use of the Green Belt will be supported. This may include opportunities

to provide access, for outdoor sport and recreation, to retain and enhance landscapes, visual amenity and biodiversity, or to improve damaged and derelict land.

Development within the Green Belt must retain its character and openness. Inappropriate development is, by definition, harmful to the Green Belt and will not be supported except in very special circumstances. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and other harm, is clearly outweighed by other considerations.

The construction of new buildings within the Green Belt should be regarded as inappropriate, unless it is for one of the exceptions listed within the National Planning Policy Framework. These exceptions include limited infilling in villages, which will be defined as the filling of small gaps (1 or 2 buildings) within a built-up frontage of development which would not exceed the height of the existing buildings, not lead to a major increase in the developed proportion of the site, or have a greater impact on the openness of the Green Belt and the purpose of including land within it. A separate Green Belt Supplementary Planning Document (SPD) will be prepared for further guidance.

Limited affordable housing for local community needs in the Green Belt will be supported on small rural exceptions sites where the development complies with Policy HC6. The Green Belt boundary will be altered through the Local Plan Review to accommodate development allocations set out in Policies SA1, SA2, SA3, SA5 and SA7. The boundaries of the reviewed Green Belt sites are identified in Appendices B-E of this document.

Open Countryside

- 4.5 Equally important to maintaining the special character of South Staffordshire is having a policy framework for protecting the Open Countryside located to the north west of the district beyond the Green Belt. Whilst not having the same level of national protection as Green Belt designation, the land designated in the Local Plan as Open Countryside is still much valued countryside particularly for its landscape and ecological qualities. It is therefore important as part of the district's wider development strategy, that a clear policy approach on what type of development is explicitly permitted in the Open Countryside is set out in the Local Plan. Equally, it will need to set out what policy factors proposals will need to be consistent with for development in the Open Countryside to be acceptable in principle.

Policy DS2 – Open Countryside

The district's Open Countryside is defined as the area in the district which is both beyond the West Midlands Green Belt and outside of individual settlements' development boundaries, as indicated on the Policies Map.

The Open Countryside contains many sensitive areas, including its landscapes and areas of ecological, historic, archaeological, agricultural and recreational value. To plan sensitively for development whilst protecting these assets, the principle of development will be supported in the Open Countryside where it is for:

- A. A new or extended building**, provided it is for:
- a) purposes directly related to agriculture or forestry; or
 - b) appropriate facilities for outdoor sport or recreation, nature conservation, cemeteries and for other uses of land which preserve the appearance or character of the Open

Countryside; or
c) affordable housing where there is a proven local need in accordance with Policy HC6; or
d) limited infilling and limited extension(s), alteration or replacement of an existing building where the extension(s) or alterations are not disproportionate to the size of the original building; or
e) redevelopment of previously developed land which would not harm the intrinsic character and beauty of the Open Countryside.

B. The re-use of a building, provided that:

f) the proposed use of any building (taking into account the size of any extensions, rebuilding or required alterations), would not harm the intrinsic character and beauty of the Open Countryside.

C. Changes of use of land:

g) the carrying out of engineering or other operations, or the making of a material change of use of land, where the works or use proposed would not harm the intrinsic character and beauty of the Open Countryside and would be consistent with the district's Spatial Strategy as set out in Policy DS3

The policy provisions set out above indicate the types of development which will, in principle, be supported within the Open Countryside. In addition to the requirements set out in this policy, any proposed scheme must also be consistent with any relevant policies set out elsewhere within the Local Plan in order to be supported.

All types of development in the Open Countryside which are not explicitly supported by Policy DS2 will be considered on a case-by-case basis. Such proposals will only be permitted where they are not located on best and most versatile agricultural land and are fully consistent with any other relevant policies set out elsewhere in the Local Plan. These include, but are not limited to, policies which relate to the district's:

- overall development strategy
- design standards
- landscape character and assets
- historic assets
- ecological assets and biodiversity
- recreational assets
- housing mix requirements (where applicable)
- sustainable travel requirements

The Open Countryside boundary will be altered through the Local Plan Review to accommodate the relevant development allocations set out in Policies SA4 and SA5. The boundaries of the reviewed Open Countryside sites are identified in Appendices B and C of this document.

Question 4:

Do you support the policy approach in Policy DS1 – Green Belt and Policy DS2 – Open Countryside? Yes/No

If no, please explain how these policies should be amended?

Housing

The district's housing needs

- 4.6 A key part of the new Local Plan is to establish the role that South Staffordshire Council can play in both meeting its own housing needs and those of the wider Greater Birmingham Housing Market Area (GBHMA), which contains local authorities with significant unmet housing needs (Birmingham and the Black Country).
- 4.7 The plan period is proposed to run from 2018 onwards, so it is also necessary for the plan to take account of the 750 dwellings already delivered in the district between 2018-2021 in any future housing needs. The district's future housing need is then calculated using the government's standard method for calculating housing needs and added to this figure. This currently requires the district to deliver a minimum annual average of **243 dwellings per annum**, starting from the current year (2021) and running to the end of the plan period (2038).

Unmet housing needs from the wider housing market area

- 4.8 In addition to the district's own housing needs, there is emerging evidence of unmet needs from the wider GBHMA, within which South Staffordshire sits. The two most significant sources of potential unmet needs are currently Birmingham City and the Black Country. The adopted Birmingham Development Plan¹ and emerging urban capacity evidence from the Black Country² suggests that a significant unmet need is arising across the GBHMA, driven by limited housing land in these urban areas.
- 4.9 Recognising the existing and emerging shortfalls, the fourteen GBHMA local authorities³ jointly prepared the GBHMA Strategic Growth Study in 2018. This drew together existing evidence on housing supply and need across the entire housing market area, estimating that at that time the unmet needs of the GBHMA sat at around 28,000 dwellings up to 2031, rising to nearly 61,000 dwellings by 2036.
- 4.10 In light of these unmet needs, the study recommended a series of strategic growth locations across the housing market area, including a number of locations in South Staffordshire. Using this evidence, we proposed to test an additional contribution of 4,000 dwellings to the unmet housing needs of the GBHMA in our Local Plan review, based on the scale of growth implied in the district by the strategic locations identified in the GBHMA Strategic Growth Study. The district's proposed contribution to wider unmet housing needs was initially proposed in the previous 2018 Issues and Options consultation. This was done to ensure that the level of growth capable of being accommodated in South Staffordshire was based on a consistent HMA evidence base that consistently considered the sustainability, deliverability and infrastructure of strategic locations across the GBHMA. It also ensured that the issue of unmet housing needs was considered from the earliest stage possible in the plan's

¹ 37,900 homes as of the 2017 Birmingham Development Plan

² The Black Country Urban Capacity Review (2021)

³ Cannock Chase District Council, Wolverhampton City Council, Dudley Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Walsall Metropolitan Borough Council, Tamworth Borough Council, Birmingham City Council, South Staffordshire District Council, North Warwickshire District Council, Redditch Borough Council, Lichfield District Council, Bromsgrove District Council, Solihull Metropolitan Borough Council and Stratford on Avon District Council

preparation and to provide Duty to Cooperate partners with the chance to comment on the our approach from the earliest stage of the plan-making process.

- 4.11 Since we proposed to accommodate this level of growth in 2018, updated land supply statements produced by the GBHMA local authorities have indicated the extent of the housing shortfall up to 2031 appears to have fallen significantly, whilst also indicating that the Black Country’s urban capacity evidence shows a significant level of housing need arising into the later 2030s⁴. This is also reflected in the Draft Black Country Plan consultation, which seeks to deliver housing in urban areas and through Green Belt release to meet the area’s housing needs, delivering 47,837 homes within the Black Country up to 2039 whilst indicating a potential shortfall of 28,239 homes they seek to export through the Duty to Cooperate. Whilst the Council will be working with the Birmingham and the Black Country authorities to ensure that housing supply within their administrative areas is truly maximised prior to being exported to other areas⁵, it still is clear from evidence to date that a significant housing shortfall is likely to remain across the GBHMA.
- 4.12 Correspondence to date from key Duty to Cooperate partners, particularly Birmingham City Council and the Black Country local authorities, has not raised concerns with the Council’s proposed contribution; and currently the GBHMA-wide evidence base has not been updated to recommend alternative or additional strategic locations for housing growth. In light of the above factors, we consider that there is still a need to deliver the strategic growth recommended in the GBHMA Strategic Growth Study, in order to ensure that that emerging and existing shortfalls from the conurbation are addressed in a genuinely sustainable manner. We therefore propose retaining our 4,000 dwelling contribution towards the unmet needs of the housing market area and will adjust our housing target accordingly to deliver this.

The proposed housing target

- 4.13 Reflecting these issues, South Staffordshire is proposing to plan for a housing target of **8,881 dwellings between 2018 and 2038**. This will allow the district to meet its own housing needs over the plan period, whilst also making a proportionate and justified contribution to the unmet needs of the GBHMA. The specific elements of the housing target can be summarised as set out below:

South Staffordshire’s own housing need using the government’s standard method (2021-2038)	4,131
Completions in the District since the start of the plan period (2018-2021)	750
Additional housing to contribute towards the unmet needs of the GBHMA	4,000
Total number of dwellings to be planned for	8,881

Table 7: Housing Target

Spatial strategy for housing

- 4.14 To consider how this level of housing growth could be accommodated, the district previously consulted on a Spatial Housing Strategy and Infrastructure Delivery (SHSID) consultation in

⁴ Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Housing Need and Housing Land Supply Position Statement (July 2020)

⁵ Particularly in areas with increased housing needs due to the city and urban centres uplift set out in Planning Practice Guidance

October 2019. This looked at how the proposed housing target could be distributed between different settlements and other broad locations within the district, informed by strategic evidence on the sustainability and sensitivity of these different locations. A preferred infrastructure-led spatial housing strategy was identified in this consultation (Option G).

- 4.15 As well as reflecting key policy and environmental constraints affecting the district, the Council's preferred strategy aimed to locate new housing in locations with better access to existing infrastructure and services or where new development could facilitate new infrastructure delivery. It also sought to deliver a balance of housing sites across the district, balancing the need for housing growth early in the plan period and for 10% of housing growth to be delivered on sites of less than 1 hectare, with the need for larger sites to deliver growth later in the plan period.
- 4.16 We thoroughly considered responses to the 2019 Spatial Housing Strategy and Infrastructure Delivery consultation and have refined the preferred spatial housing strategy to reflect some of the issues raised. We have also used the findings of the site assessment process (set out in full in the separate Housing Site Selection Topic Paper) to arrive at the exact level of growth given to each area of the district. In summary, key changes made are:
- Increasing growth proposed North of Penkridge to better reflect the findings of the GBHMA Strategic Growth Study and non-Green Belt land available north of the village;
 - Allowing for further limited growth at Cheslyn Hay/Great Wyrley beyond the existing allocated/safeguarded land, recognising the area's Tier 1 settlement status, but balancing this against the lack of a strategic recommendation for these villages in the GBHMA Strategic Growth Study and the site specific constraints affecting land in the area;
 - Limiting new allocations at Perton to the existing safeguarded land, reflecting the lack of a finalised junction improvement scheme at the A41 and the remoteness of Green Belt site options from education facilities;
 - Reducing the amount of growth allocated to the western edge of the Black Country, reflecting the relatively limited unmet need arising from Dudley Metropolitan Borough, which also holds significant Green Belt site options in this area within its own administrative boundary as set out in the GBHMA Strategic Growth Study;
 - Removing the proposal to identify small site allocations in Tier 4 villages, as current monitoring information suggests these allocations are not required to meet the national requirement for 10% of housing growth to be delivered on sites of less than 1 hectare;
 - Identifying villages, namely Brewood and Great Wylrey, where specialist elderly housing allocations may address existing imbalances between local needs and supply⁶
- 4.17 Taken together, these factors have led to a slightly revised spatial strategy for housing delivery in the district, which distributes housing delivery across the plan period as set out in the Table 8. These figures incorporate planning permissions granted since 2018 as well as allocations and safeguarded land from the Council's adopted Site Allocations Document (2018) that have yet to come forward.

⁶ Based on information collected in the Specialist Housing: Local Need and Site Allocations Topic Paper 2021

Spatial Housing Strategy 2018 - 2038		Indicative minimum dwelling numbers 2018-2038 ⁷		
Location	Total proportion of housing delivery	Existing planning permissions and allocations	Safeguarded land	New allocations
The district's rural area				
Tier 1 villages	39.7%	1151	890	1939
Penkridge	17.2 %	504	88	1129
Codsall/Bilbrook	16.7 %	423	584	666
Cheslyn Hay/Great Wyrley	5.8 %	224	218	144
Tier 2 villages	17.0%	723	614	370
Wombourne	8.0 %	289	280	239
Brewood	1.8 %	76	63	43
Kinver	2.5 %	123	82	44
Perton	3.7 %	226	150	0
Huntington	0.9 %	9	39	44
Tier 3 villages	6.1%	466	104	81
Essington	2.3 %	235	0	0
Coven	1.1 %	64	48	0
Featherstone	1.2 %	84	39	0
Shareshill	0.0 %	1	0	0
Wheaton Aston	1.0 %	67	0	37
Pattingham	0.5 %	7	17	22
Swindon	0.3 %	8	0	22
Tier 4 villages	0.3%	30*	0	0
Growth in other rural locations and Tier 5 settlements	2.6%	258*	0	0
Areas adjacent to neighbouring towns and cities				
Employment-led growth at Land at Cross Green (Brewood and Coven Ward)	12.0%	0	0	1,200
Northern edge of the Black Country at Land north of Linthouse Lane (Essington Ward)	12.0%	0	0	1,200
Western edge of the Black Country at Land at Langley Road (Wombourne North and Lower Penn Ward)	3.9%	0	0	390
South of Stafford at Land at Weeping Cross (Penkridge North East and Acton Trussell)	1.7%	0	0	168

⁷ These figures incorporate planning permissions granted since 2018 as well as allocations and safeguarded land from the Council's adopted Site Allocations Document (2018) that have yet to come forward

* Supply is made up of permissions for single dwellings through to a single permission for 34 dwellings. See Housing Site Assessment Topic Paper for full details

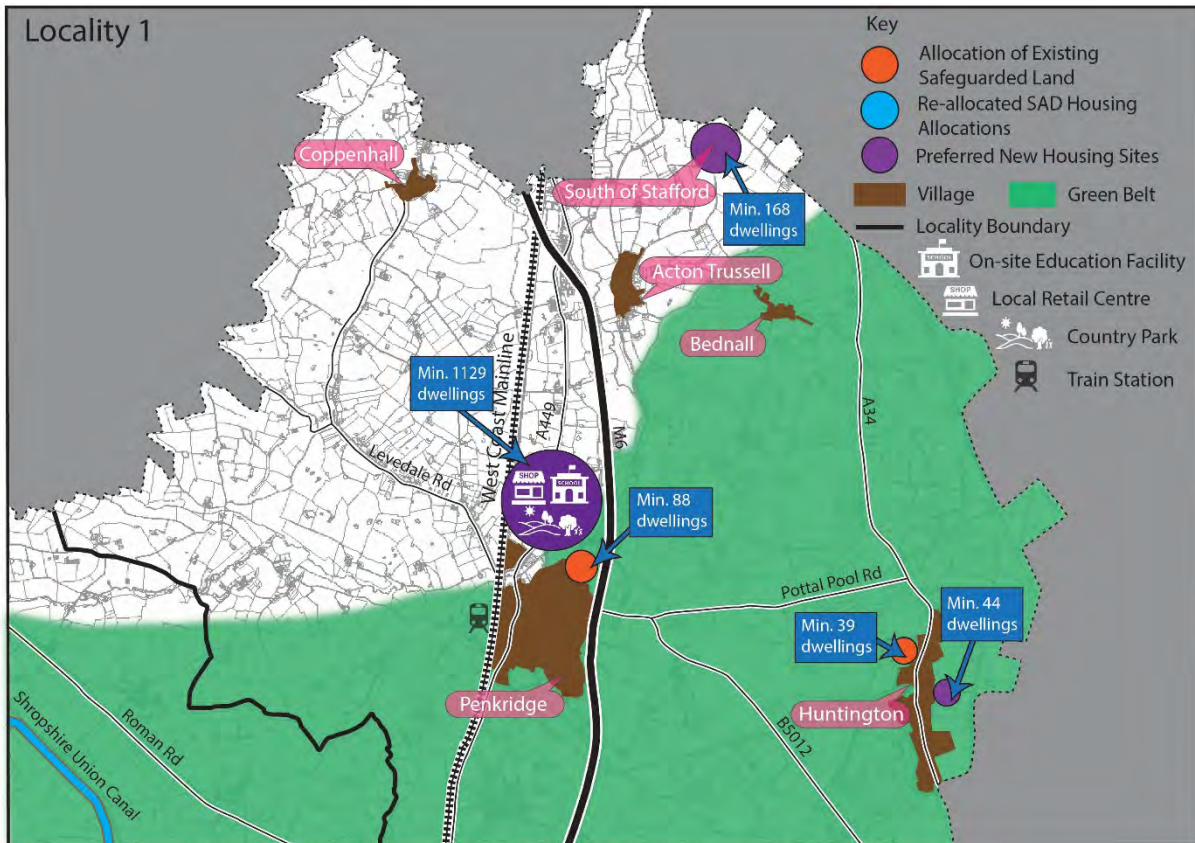
Ward) (A34 corridor)				
Other sources of supply				
Windfall development on small sites	4.5%	450	0	0

Table 8: How housing growth will be distributed across the district

- 4.18 In total, this distribution of growth exceeds the minimum amount of land release required to meet the district's 8,881 dwellings housing target. This will help the plan to meet the national policy requirement to respond to changing circumstances in the plan period.
- 4.19 Housing number for each village/broad location are influenced by the need to distribute the overall housing requirement sustainability to reflect the settlement hierarchy, (as informed by our Rural Services and Facilities Audit 2021); the evidence base (e.g. GBHMA Strategic Growth Study 2018); the level of constraints present around each village/broad location; and national policy factors (e.g. the requirement for 10% of site to be less than 1ha). The full set of factors were considered in the 2019 SHSID consultation document.
- 4.20 The sections that follow set out the strategy for delivering this housing growth in different areas of the district. The diagrams and descriptions that follow summarise only the locations that will be the focus for **new** housing allocations. They do not include existing planning permissions within the district, which make up the remainder of the housing growth for the plan period up to 2038, as set out in Table 8.

Housing growth in Locality 1

- 4.21 The diagram below summarises where new housing growth will be delivered in Locality 1 (the north of the district).



Penkridge

- 4.22 Housing growth in this part of the district will be driven by a large-scale extension in the Open Countryside to the north of Penkridge. This larger scale development will deliver significant housing growth alongside a mix of other uses, including a new first school, local retail and a country park. This recognises the recommendations for a large-scale extension north of Penkridge in the GBHMA Strategic Growth Study, the non-Green Belt land available in this area of the village and the greater level of services and facilities in Penkridge compared to other villages in the district, including a railway station. The Council has increased the level of growth proposed in this location since the previous Local Plan review consultation to ensure the delivery of sustainable non-Green Belt land in this location is maximised, and to ensure that the necessary infrastructure to support housing growth in this area can be delivered.
- 4.23 The delivery of the existing non-Green Belt safeguarded land in the village will also be brought forward, to ensure that sustainable non-Green Belt sites in the district are delivered.

Southern Edge of Stafford (A34 corridor)

- 4.24 This location will not be a focus for larger-scale housing growth. This recognises the sensitive landscape and potential highways concerns that larger scale growth in this

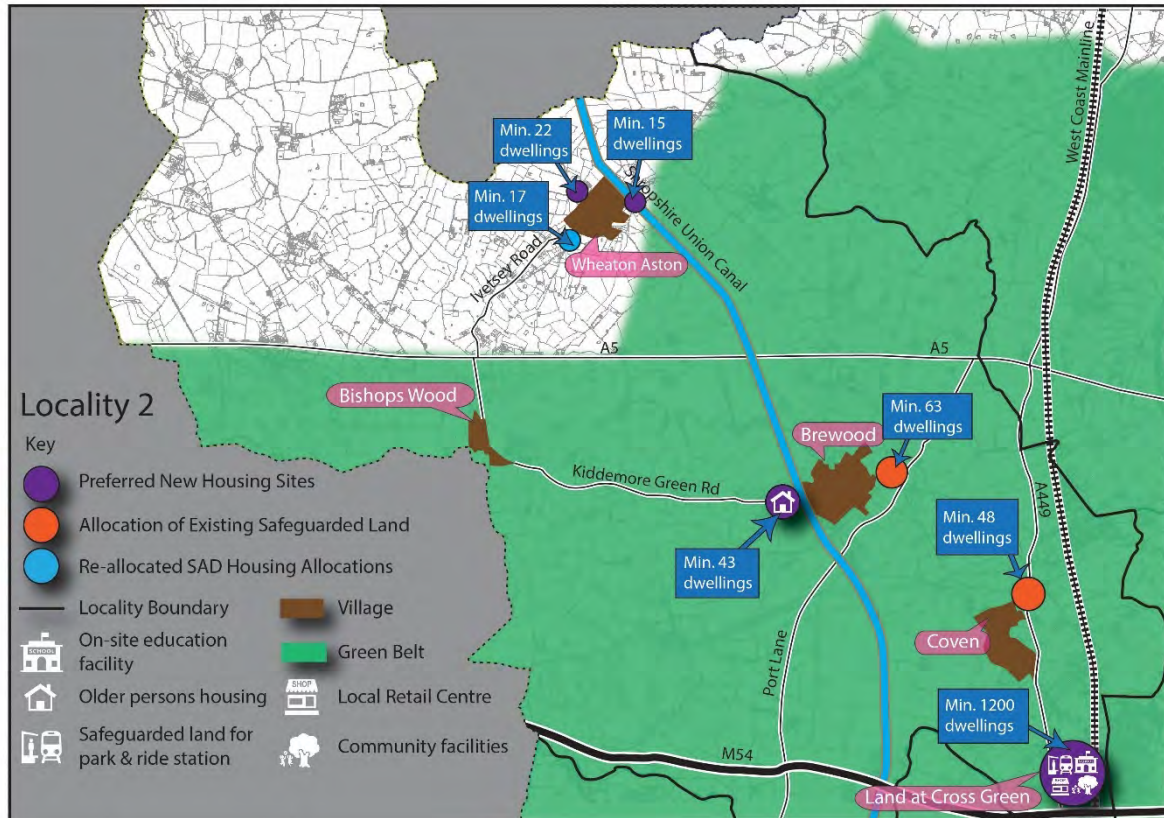
location could cause, as well as the lack of unmet housing needs in Stafford and the location's remoteness from areas of unmet needs in the wider GBHMA. Instead, a smaller scale extension to the adjacent town of Stafford will be delivered in this area, which will ensure the sustainable delivery of non-Green Belt housing land in the district.

Huntington

- 4.25 Housing growth in the village will be delivered through limited land release alongside the delivery of the safeguarded land identified adjacent to the village. This approach balances the sensitive landscape in the area surrounding the village, including AONB, the extent of Green Belt land in this area and the relative reduced level of services and facilities in Huntington compared to other settlements in the district.

Housing growth in Locality 2

- 4.26 The diagram below summarises where new housing growth will be delivered in Locality 2 (the north-west of the district).



Land at Cross Green

- 4.27 Housing growth in this part of the district will be driven by a large-scale housing site at Land at Cross Green. Growth in this area will deliver significant housing alongside a mix of other uses, including a new primary school, local retail and strategic green infrastructure. It also provides the opportunity to safeguard land to deliver the rail-based parkway opportunity identified in the district's existing Core Strategy adjacent to the West Coast Mainline. Delivering housing growth in this location recognises the recommendations for a strategic housing site in this area in the GBHMA Strategic Growth Study and the area's proximity to significant employment opportunities at the i54 and ROF Featherstone strategic employment sites. It also recognises the infrastructure that could be facilitated by large scale growth and the area's proximity to the City of Wolverhampton, with its associated services and employment opportunities.

Brewood

- 4.28 Housing growth in the village will be delivered through limited land release alongside the delivery of the safeguarded land identified adjacent to the village. This approach balances the historic character of the village, the extent of Green Belt land in this area and the relative level of services and facilities in Brewood compared to other settlements in the district. It also recognises the potential for additional allocations to be made to address the acute local need for specialist elderly housing in this location.

Coven

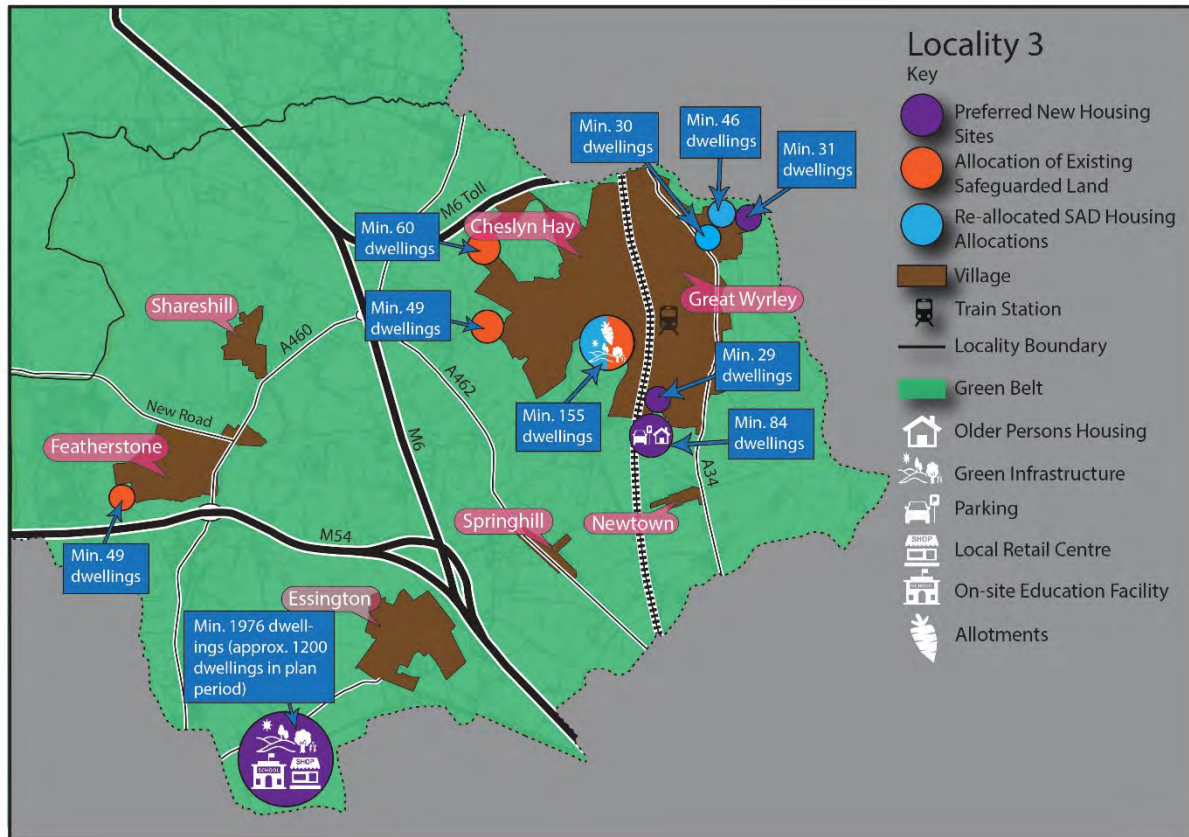
- 4.29 Housing growth in the village will be limited to existing planning permissions, sites within the existing development boundary of the village and the delivery of the safeguarded land adjacent to the village. This approach recognises the existing housing growth already delivered around the village during the plan period, the village's relatively limited services and facilities and its proximity to more sustainable larger scale growth options proposed adjacent to the northern edge of the Black Country.

Wheaton Aston

- 4.30 Housing growth in the village will be delivered through limited land release to deliver multiple small sites of less than one hectare within and around the village. This approach recognises the existing housing growth already delivered around the village during the plan period and the village's relatively limited services and facilities, balanced against the non-Green Belt land opportunities available in and around the village.

Housing growth in Locality 3

- 4.31 The diagram below summarises where new housing growth will be delivered in Locality 3 (the north-east of the district).



Cheslyn Hay/Great Wyrley

- 4.32 New housing growth in this area will be increased through the delivery of new allocations, which will be directed to less constrained site options around the two villages. These will be delivered alongside the existing allocated and safeguarded housing sites dispersed around the two villages.
- 4.33 The Council has increased the level of growth proposed in this location since the previous Local Plan review consultation, by proposing some new additional allocations as well as the existing allocated sites and safeguarded land in this area. The delivery of new housing allocations in Cheslyn Hay/Great Wyrley recognises the greater level of services and facilities to support local growth in these villages and the potential for additional allocations to be made to address the acute local need for specialist elderly housing in this location. Unlike other Tier 1 settlements (Penkridge & Codsall/Bilbrook), growth in Cheslyn Hay/Great Wyrley is tempered by the lack of a large-scale growth identified for the villages in the GBHMA Strategic Growth Study, the alternative options to locate growth to meet GBHMA unmet needs directly adjacent to the northern edge of the Black Country and the site-specific constraints affecting growth in this area.

Northern edge of the Black Country

- 4.34 Housing growth in this part of the district will be driven by a large-scale housing site (land north of Linthouse Lane) adjacent to the northern edge of the Black Country urban area. Growth in this area will deliver significant housing alongside a mix of other uses, including a new primary school, local retail and strategic green infrastructure. Delivering housing growth in this location recognises the infrastructure that could be facilitated on a larger strategic housing site and the area's proximity to the higher order services and facilities in the cities and towns of the Black Country.

Featherstone & Shareshill

- 4.35 Housing growth around these villages will be limited to existing planning permissions, sites within the existing development boundaries of the villages and the delivery of the safeguarded land adjacent to Featherstone. This approach recognises both villages' relatively limited services and facilities, their proximity to more sustainable larger scale growth options proposed adjacent to the northern edge of the Black Country and the existing growth already delivered at Featherstone during the plan period.

Essington

- 4.36 Housing growth in the village will be limited to sites within Essington's existing development boundary and existing planning permissions around the village. This approach recognises the significant existing housing growth already delivered around the village during the plan period, the village's relatively limited services and facilities and its proximity to more sustainable larger scale growth options proposed adjacent to the northern edge of the Black Country.

Housing growth in Locality 4

- 4.37 The diagram below summarises where new housing growth will be delivered in Locality 4 (the central area of the district).



Codsall/Bilbrook

- 4.38 Significant housing growth in this part of the district will be focused on Codsall/Bilbrook. Increased allocations around the village will deliver significant housing growth alongside a mix of other uses, including a new first school, local retail and strategic green infrastructure. This recognises the recommendations for proportionate dispersal around Codsall/Bilbrook in the GBHMA Strategic Growth Study and the greater level of services and facilities in this area compared to other villages in the district, including two railway stations. The level of growth to be delivered is also aligned to the level of growth advised by the Education Authority to deliver a new 2 Form Entry First School in this location and may also offer opportunities to deliver additional station car parking at Codsall.

Perton

- 4.39 The Council has reduced the level of growth proposed in this location since the previous Local Plan review consultation, removing the recommendation for a new land allocation in this area. This change recognises the significant constraints identified in the site assessment process affecting new site options around the village, including highways concerns, proximity to education and Green Belt/landscape sensitivities. Because of these issues and the need to only release Green Belt in exceptional circumstances, housing growth in Perton

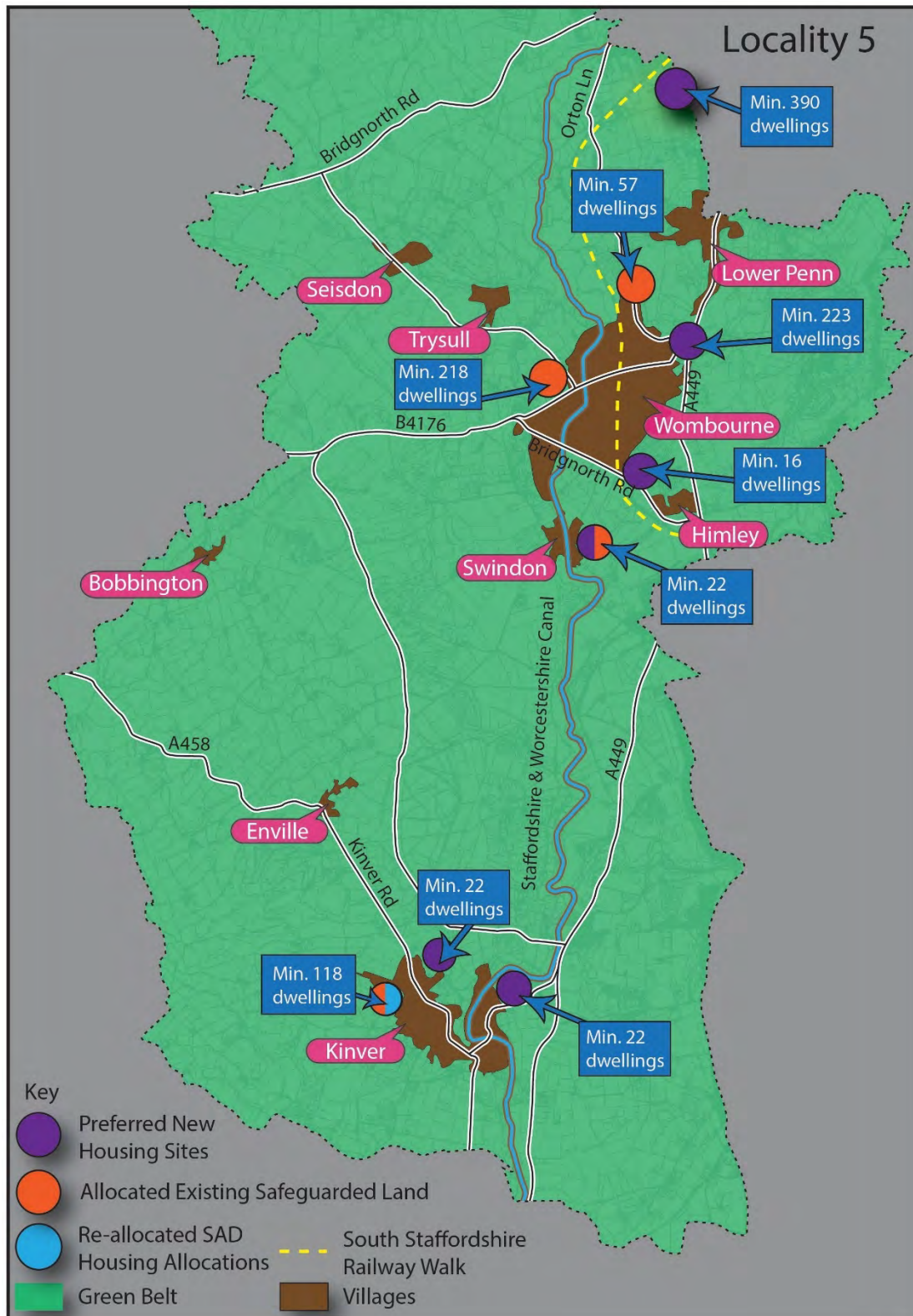
will be limited to existing planning permissions, sites within the existing development boundaries of the villages and the delivery of the safeguarded land adjacent to Perton.

Pattingham

- 4.40 Housing growth in the village will be delivered through an additional small site allocation alongside the delivery of the safeguarded land identified adjacent to the village. This approach recognises the extent of Green Belt land in this area and the limited level of services and facilities in Pattingham compared to other settlements in the district. It also has regard to the opportunities for smaller villages in the district to help the Council meet its duty to allocate a certain proportion of growth on sites of less than one hectare.

Housing growth in Locality 5

- 4.41 The diagram below summarises where new housing growth will be delivered in Locality 5 (the south of the district).



Wombourne

- 4.42 Housing growth in this area will be increased through the delivery of new housing allocations around Wombourne, which will be brought forward alongside the existing allocated and safeguarded housing sites dispersed around the village. First consideration will be given to any previously developed land in the Green Belt, where these can be shown to be deliverable and sustainable, before less constrained sites elsewhere in the Green Belt surrounding the village are considered.
- 4.43 This approach recognises, the potential opportunities presented by previously developed land and areas of lower Green Belt harm around the village area and the relative level of services and facilities in Wombourne compared to other settlements in the district. Whilst priority has been given to previously developed land in identifying locations for housing growth, site constraints have also meant that greenfield areas of lesser Green Belt harm have also needed to be considered.

Western edge of the Black Country

- 4.44 Housing growth will be delivered adjacent to the western edge of the Black Country, allowing for the limited expansion of the Black Country urban area. This will be delivered through a smaller urban extension to the Black Country, directed onto a less constrained site option within the Green Belt.
- 4.45 This area provides an opportunity to accommodate housing growth directly adjacent to the towns and cities within the Black Country, in a location identified as a strategic priority for dispersed housing growth in the GBHMA Strategic Growth Study. These factors have been balanced against the poorer access to employment via sustainable transport measures in this broad location and the lack of larger scale site options to deliver sustainable mixed-use growth in this area. The extent of land adjacent to Dudley Metropolitan Borough Council has also informed the level of growth allocated in this area, as Dudley MBC has a relatively limited unmet housing need and significant Green Belt opportunities within its own administrative boundaries to address this need.

Kinver

- 4.46 Housing growth in the village will be delivered through additional small site allocations of less than one hectare alongside the delivery of the safeguarded land identified adjacent to the village. This approach balances the historic character of the village, the extent of Green Belt land in this area and the relative level of services and facilities in Kinver compared to other settlements in the district. It also has regard to the opportunities for smaller villages in the district to help the Council meet its duty to allocate a certain proportion of growth on sites of less than one hectare.

Swindon

- 4.47 Housing growth in the village will be delivered through an additional small site allocation alongside the delivery of the safeguarded land identified adjacent to the village. This approach recognises the extent of Green Belt land in this area and the limited level of services and facilities in Swindon compared to other settlements in the district. It also has regard to the opportunities for smaller villages in the district to help the Council meet its duty to allocate a certain proportion of growth on sites of less than one hectare.

Gypsies and Travellers

- 4.48 It is also the requirement of the Local Plan to assess and plan to meet the housing needs of different groups of the community, including Gypsies, Travellers and Travelling Showpeople. The Government's Planning Policy for Traveller Sites (PPTS) 2015 details how travellers' housing needs should be assessed for those covered by the definition in Annex 1 of that document. The focus of Gypsy and Traveller and Travelling Showpeople policies in this plan is therefore to make provision for those traveller families that meet this definition of Gypsies and Travellers and Travelling Showpeople set out in the PPTS, with the needs of those not meeting this definition met through general needs housing policies.
- 4.49 In line with national policy the needs for families have been assessed through the Gypsy and Traveller Accommodation Assessment (2021) and Pitch Deliverability Study (2021). This evidence demonstrates that need is being generated by existing families. Some of this is current need as a result of being on an unauthorised pitch and overcrowding. However, the vast majority of need is generated through household formation derived from the demographics of residents and teenagers on site needing a pitch of their own within the next five years.
- 4.50 Due to this, our strategy for new Gypsy, Traveller and Travelling Showperson provision will be to continue to deliver privately owned sites/pitches to meet existing family needs. The evidence supports an approach therefore of looking to allocate existing temporary or unauthorised sites to permanent (subject to other planning considerations) and looking to intensify and extend existing sites to meet identified family need, rather than allocating wholly new sites that may have been suggested by non-travellers, and where deliverability is more uncertain. This approach will see the continued concentration of traveller pitches where sites have historically been consented on appeal in the north of the district predominantly along the A449 and A5 transport corridors. Notwithstanding this, other than those considered through the Pitch Deliverability Study, **the Council does not currently have alternative site options suggested by third parties where an alternative strategy of dispersing new pitch allocations more widely across the district could be tested.** As part of the consultation, we are asking the question (see Question 9) of whether there are other site options to test an alternative approach

Employment

- 4.51 It is the role of the Local Plan to plan for employment growth in the district over the plan period taking account of the evidence of need and the existing supply of employment land. To inform this we published our Economic Development Needs Assessment (EDNA) in 2018 that set out a number of scenarios for future employment needs over the plan period. In line with the Planning Practice Guidance (PPG) requirements, the EDNA also undertook an analysis of South Staffordshire's Functional Economic Market Area (FEMA) and identified South Staffordshire as being in the same FEMA as Cannock Chase district, Dudley, Walsall and Wolverhampton.
- 4.52 The EDNA 2018 identified a need for South Staffordshire of 67ha under 'growth scenario 1 – past completions'. This represented a business-as-usual approach, although did project forward an element of sub regional employment sites that came forward as Regional Investment Sites. Under a higher growth scenario, 'growth scenario 2 – past completions and growth (GVA)' the EDNA identified a need for 86ha.

- 4.53 The EDNA 2018 identified that South Staffordshire has sufficient supply of developable employment land within the district (circa 105ha) to meet its own employment requirements over the plan period (to 2038), and when considered against the two demand scenarios resulted in a 38ha oversupply against 'growth scenario 1- past completions', and a 19ha oversupply against 'growth scenario 2 – Past completions and growth GVA' covering the period 2018-38. National guidance however requires authorities consider the 'most appropriate geography'⁸ to prepare policies for employment and require authorities to define their 'best fit'⁹ Functional Economic Market Area. Given this, it is over the South Staffordshire FEMA geography that it is considered the most appropriate basis for considering our role in meeting cross boundary employment needs.
- 4.54 Cannock Chase District Council is also in the process of preparing their new Local Plan and in February 2021 consulted on their Preferred Options which indicated that 50ha of employment land will be provided over the plan period to meet Cannock's employment needs. There is currently no indication that Cannock are unable to meet this need within their administrative boundary.
- 4.55 The Black Country authorities are also preparing their Local Plan with the Black Country Draft Plan (August 2021) confirming that they have a need of 565ha of employment up until the end of their plan period (2039). The Black Country Draft Plan confirms they are only able to deliver 355ha of this leaving a shortfall on 210ha. Their Draft Plan indicates that this unmet need should be exported.
- 4.56 Subsequent to the EDNA 2018 findings, South Staffordshire's employment land supply has increased significantly due to the recent consenting of a Strategic Rail Freight Interchange, known as West Midlands Interchange (WMI), at Four Ashes. As WMI already has consent through the Development Consent Order process, it is proposed that it is allocated and removed from the Green Belt (see Policy SA7 - Employment allocation - West Midlands Interchange). This sees the employment land supply in South Staffordshire increase to circa 340ha (see Table 9).
- 4.57 WMI significantly increases the known oversupply of employment land in South Staffordshire, and with this, the scope to contribute towards unmet needs elsewhere in the FEMA. Currently, of the authorities within the South Staffordshire FEMA, only the Black Country have declared unmet employment needs. However, the exact amount of the oversupply to be attributed to their unmet needs will need to be agreed through a Statement of Common Ground. This will be contingent on the amount of employment land required to meet South Staffordshire's needs, including ensuring we have sufficient plan flexibility to respond to changes in economic circumstances.
- 4.58 Given that South Staffordshire's EDNA was undertaken in 2017/18 it is our intention to prepare an updated EDNA prior to our Publication consultation to review whether the demand for employment land has changed, particularly in light of Brexit and Covid-19. This update will ensure that our employment evidence is up to date for submission of the Plan and will form the basis for agreement through a Statement of Common Ground on how much of the district's oversupply of employment land is available for export to meet unmet needs in the FEMA.

⁸ Paragraph: 040 Reference ID: 61-040-20190315

⁹ Paragraph: 026 Reference ID: 2a-026-20190220

Spatial Strategy to 2038

- 4.59 The spatial strategy for South Staffordshire set out in Policy DS3 sets out how the district will meet its housing, Gypsy and Travellers and employment needs up to 2038, whilst sensitively managing other uses such as retail, agriculture and tourism. It is a key strategic policy that sets the framework for delivering growth through the Local Plan and provides details of how windfall developments will be considered that are proposed outside the Local Plan allocations process.
- 4.60 The spatial strategy and distribution of growth is based upon an infrastructure led approach. This can mean different things for different locations. For larger strategic sites this may mean on site delivery on new infrastructure such as a new school or local centre. For smaller villages it may be about smaller scale infrastructure, such as delivering a local play space, or about planning for limited new development that will help sustain existing infrastructure (e.g local school) over the longer term.

Policy DS3 – The Spatial Strategy to 2038

During the plan period to 2038, the Council will deliver a minimum of 4,881 dwellings plus a contribution of 4,000 dwellings towards meeting the Greater Birmingham Housing Market Area shortfall.

The principal aim will be to meet needs in a manner which builds on the district's existing infrastructure and environmental capacity, whilst recognising opportunities to deliver local infrastructure opportunities identified within the district. Throughout the district, growth will be located at the most accessible and sustainable locations in accordance with the settlement hierarchy set out below. The Council will work with partners to deliver the infrastructure, facilities and services required to support this growth.

An integral part of the Strategy will be to ensure that growth is distributed to the district's most sustainable locations, avoiding a disproportionate level of growth in the district's less sustainable settlements, whilst also recognising that very limited growth in less sustainable areas may be appropriate in limited circumstances set out in the settlement hierarchy below. It will also seek to maintain and enhance the natural and historic environment and the local distinctiveness of the district and retain and reinforce the current settlement pattern.

Tier 1 settlements

The district's Tier 1 settlements are Penkridge, Codsall/Bilbrook and Cheslyn Hay/Great Wyrley. These settlements hold a wider range of services and facilities and have access to key rail corridors into the adjacent towns and cities upon which the district relies for its higher order services and employment. The sustainable growth of these larger rural settlements will be delivered through appropriate allocations made in the Local Plan. These Tier 1 settlements will continue to support windfall housing growth, employment development and service provision, where it is consistent with other Local Plan policies. Proposals for retail and small-scale office development should be directed into the centres identified in Policy EC6, in a manner which reflects their role and function.

Tier 2 settlements

The district's Tier 2 settlements are Wombourne, Brewood, Kinver, Perton and Huntington. These settlements hold a wider range of services and facilities than other smaller

settlements in the district's rural area. The sustainable growth of these larger rural settlements will be delivered through appropriate allocations made in the Local Plan. These Tier 2 settlements will continue to support windfall housing growth, employment development and service provision, where it is consistent with other Local Plan policies. Proposals for retail and small-scale office development should be directed into the centres identified in Policy EC6, in a manner which reflects their role and function.

Tier 3 settlements

The district's Tier 3 settlements are Essington, Coven, Featherstone, Sharesill, Wheaton Aston, Pattingham and Swindon. These settlements hold a smaller range of services and facilities than Tier 1 and 2 settlements and as such are given a lesser level of growth. Limited growth in these smaller rural settlements will be delivered through appropriate allocations made in the Local Plan.

The district's Tier 3 settlements will continue to support limited windfall housing and employment growth to assist in meeting local needs, where it is consistent with other Local Plan policies. Employment development will be small in scale and aim to maintain the vitality and viability of these communities. Proposals for retail and small-scale office development should be directed into the centres identified in Policy EC6, in a manner which reflects their role and function.

Tier 4 settlements

The district's Tier 4 settlements are Bednall, Bishops Wood, Bobbington, Dunston, Himley, Seisdon and Trysull. These settlements will continue to support very limited windfall housing growth to assist in safeguarding the limited services and facilities in each village and to address local housing needs. Limited windfall housing growth will be supported only where it is consistent with other Local Plan policies.

Tier 5 settlements

The district's Tier 5 settlements are set out in the Rural Services and Facilities Audit 2021. These settlements are not intended to experience further housing or employment growth, owing to their poorer public transport links and lack of services and facilities relative to other settlements within the district. New development in these locations will be limited to the conversion and re-use of redundant rural buildings to appropriate uses, in accordance with other development plan policies. On a case-by-case basis, the very limited redevelopment of previously developed land for housing may also be supported within these settlements where this would not increase unsustainable transport movements from the settlement in question and would not conflict with other Local Plan policies.

The district's wider rural area

In the rural area outside of the district's existing settlements, the objective of the Spatial Strategy is to protect the attractive rural character of the countryside. To deliver this, new development will be restricted to particular types of development to support biodiversity, carbon sequestration, renewable and low carbon technologies, tourism, sport and recreation and the local rural economy and rural diversification, where this is consistent with other Local Plan policies. Other than the forms of residential development identified as being acceptable in rural areas in the National Planning Policy Framework, isolated housing growth away from the district's rural settlements will not be supported.

Growth adjacent to the neighbouring towns and cities in the Black Country

Housing growth will be primarily located at the allocations made adjacent to the Black Country through this Local Plan, in order to facilitate sustainable growth of their towns and cities and to assist in meeting wider unmet housing needs from the housing market area.

These are:

- *Land at Cross Green*
- *Land north of Linthouse Lane*
- *Land at Langley Road*

As part of delivering these sites, the Council will work cross-boundary with infrastructure bodies and statutory partners to ensure these sites are supported by any necessary infrastructure. In addition, the Council will continue to work with partners to seek opportunities to deliver a rail-based parkway on land safeguarded for this use through the Land at Cross Green development.

Growth adjacent to the town of Stafford

Housing growth will be primarily located at the strategic allocation made adjacent to Stafford through this Local Plan, in order to facilitate sustainable growth at a non-Green Belt location. This is:

- *Land at Weeping Cross, west of the A34*

The district's freestanding strategic employment sites

Outside of the district's rural settlements, support will continue to be given for employment and economic development at the district's five existing freestanding strategic employment sites (West Midlands Interchange, i54 South Staffordshire, Hilton Cross, ROF Featherstone/Brinsford and Four Ashes). Existing and proposed employment sites throughout the district will be safeguarded for their respective uses, in accordance with other Local Plan policies.

Gypsy, Travellers and Travelling Showpeople sites

The district will seek to meet existing Gypsy, Travellers and Travelling Showpeople needs as far as possible, pursuing a strategy of meeting evidenced needs where they arise throughout the district. To deliver this strategy, allocations in the Local Plan will be used to allow for the sustainable intensification, extension and regularisation of suitable existing sites, in a manner consistent with other development plan policies and local evidence on pitch deliverability. Windfall proposals for additional pitches will be considered on a case-by-case basis against the criteria in Policy HC8 and other relevant Local Plan policies.

Delivering the Strategy

The Spatial Strategy will be delivered through allocations made in this Local Plan and associated planning policies, ensuring development is sustainable, enhances the environment and provides any necessary mitigating or compensatory measures to address harmful implications. In all cases development should not conflict with the policies of the development plan.

Question 5:

Do you support the policy approach in Policy DS3 – The Spatial Strategy to 2038? Yes/No

If no, please explain how this policy should be amended?

Longer Term Growth Aspirations for a new settlement

- 4.60 As well as setting the spatial strategy for the district up until 2038, the Local Plan will set out a criteria based policy (Policy DS4) setting the parameters for what a new settlement to be delivered beyond the plan would need to incorporate should a suitable option come forward. This reflects the Council's desire to proactively set the framework for what we would expect from a sustainable freestanding new settlement. This includes the identification of a specific area of search along a key transport corridor (A449/ West Coast Mainline corridor), recognising that this was the sole area of opportunity for new settlements identified in the district in the GBHMA Strategic Growth Study 2018.

Policy DS4 – Longer Term Growth Aspirations for a New Settlement

It is a key longer term aspiration of the Council to explore potential options within the district for a sustainable independent new settlement which has the capacity to accommodate the future housing and economic needs of the district. It is not anticipated that a new settlement will contribute to housing growth during the current plan period. Instead, it will form a key option that the Council will want to consider alongside alternatives in future plan-making, meaning it is important that work to identify any potential options begins now.

To provide a focus for future new settlement site proposals, the transport corridor formed by the A449 and West Coast Mainline between Wolverhampton and Stafford has been identified as a potential area of search for such proposals. This is shown indicatively in Appendix F of this document. The exact location of such a settlement and alternative growth options should be considered through the plan-making process as part of a subsequent review of the Local Plan. Key to this will be evidence supporting any future proposal's sustainability, infrastructure requirements, viability considerations, delivery mechanisms and future stewardship arrangements.

It is anticipated any new settlement would be of a scale that is self-sustaining and enables a genuine mix of vibrant mixed communities that support a range of local employment types and premises, education, retail opportunities, recreational and community facilities with a wide range of housing to meet the needs of the community.

The Council anticipates that in sustainably delivering this growth, any new settlement proposals will need to deliver the following objectives:

- **Beautifully Designed:** Create a place with a local identity, with well-connected and distinctive neighbourhoods and an attractive and functioning centre and public realm, delivering a design code and masterplan for the development with a strong local vision that emerges from collaborative community engagement at the earliest stages.

- **Mixed Communities:** Offer a range of high quality and distinctive housing types for both market and affordable housing, designed to meet the needs of all members of the community at all stages of life.

- **Sustainable Size and Location:** Be of a scale and size that provides a range of local employment types and premises, education, retail opportunities, recreational and community facilities to meet the day-to-day needs of new residents within the settlement.

Where this is not realistically achievable, put in place measures to ensure the delivery of direct and convenient sustainable transport to higher order services and employment in nearby towns and cities (including the Black Country urban area).

- **Transport:** Reduce car dependency whilst allowing residents to meet their day-to-day needs via other means, designing a community that is easy to navigate with direct and high quality walking, cycling, rail and bus infrastructure.

- **Green Infrastructure and Health:** Be designed to provide the choices and chances for all to live a healthy life, including generous, accessible, and good quality green and blue infrastructure that improves health and wellbeing alongside wider opportunities for recreation, sport, biodiversity and enhancements to natural capital.

- **Future-proofed:** Support radical reductions in greenhouse gas emissions through the community's design, whilst also allowing for changing demographics, future growth, and the impacts of climate change including flooding risk and water availability. Ensure the delivery of durable landscapes and building design planned for generations to come, including anticipation of the opportunities presented by technological changes such as driverless cars and renewable energy measures.

- **Infrastructure-led:** Ensure the required infrastructure is delivered at the appropriate stage, with consideration given to phasing, delivery mechanisms, future maintenance and stewardship from the outset.

Question 6:

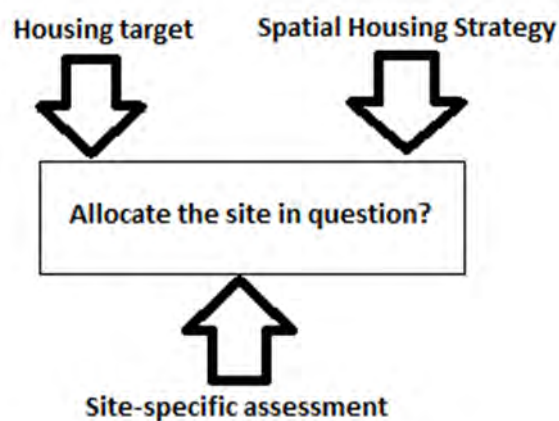
Do you support the policy approach in and Policy DS4 – Longer Term Growth Aspirations for a New Settlement? Yes/No

If no, please explain how this policy should be amended?

5. Site Allocations

Housing

- 5.1 Following consultation on the Spatial Housing Strategy and Infrastructure Delivery (SHSID) consultation in October 2019, site assessments were undertaken using the site assessment criteria consulted on in Appendix 6 of the SHSID. All sites at tier 1-4 settlements and other locations identified in the Council’s preferred spatial option for growth (Option G) were assessed.
- 5.2 Following assessment of sites, the results of these, alongside responses to the SHSID, were considered together to determine where amendments to the preferred spatial strategy were justified (see paragraph 4.14). The process involved considering which sites to allocate in order to deliver the proposed housing target of 8,881 dwellings between 2018 and 2038. This entailed considering a balance of top-down strategic factors and bottom-up site-specific factors, which are shown in the diagram below:

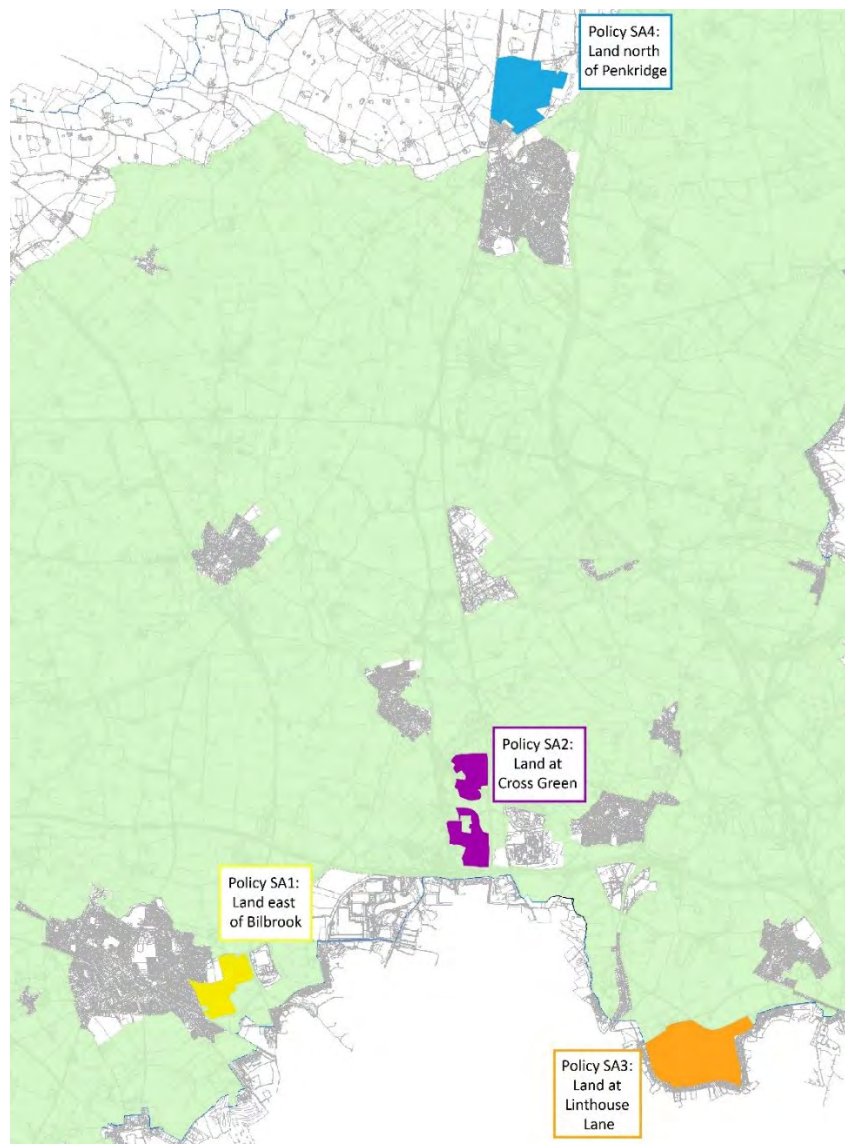


- 5.3 The full methodology, factors considered, and results of the site assessment process for all site options can be found in our Housing Site Assessment Topic Paper.
- 5.4 The site selection process has identified proposed sites to meet our revised Infrastructure led strategy between 2018-38, ensuring enough housing land is identified to meet the Council’s housing target of **8,881 dwellings** between 2018 and 2038, whilst providing extra land to ensure the plan is flexible to changing circumstances. Where possible, the likely infrastructure requirements for both large scale and smaller housing sites have been identified. These are set out in Policies SA1-SA4 and Appendix B for the District’s largest site proposals, and in Policy SA5 and Appendix C for the small to medium sized site proposals. Further details on the delivery of these infrastructure items (e.g estimated costs, where known) are set out in the Infrastructure Delivery Plan (2021)
- 5.5 Further work will need to be done with infrastructure providers following this consultation to confirm these infrastructure requirements, alongside additional viability work. This will include preparing site specific viability assessment of sites with more non-standard infrastructure requirements than are currently reflected in the standard site typologies tested in the Local Plan Viability Study 2021. Following this, site specific infrastructure

requirements will be refined (and more detail added where appropriate) for the Publication version of the Local Plan.

Strategic Masterplanning Locations

- 5.6 The new Local Plan will have a stronger focus on design than the current Local Plan reflecting a desire to create beautiful places. The plan will have stronger design policies for all sites and will commit to site specific Supplementary Planning Documents (SPDs) for the four strategic housing allocations. These SPDs will be finalised following adoption of the plan, setting out a masterplan and associated design codes for these sites whilst sustainably managing the delivery of infrastructure on each site to ensure that infrastructure is provided at the right stage in a site's development. It is proposed that the process for masterplanning these sites will be guided by community engagement, in line with the approach advocated by the Government's national model design code that puts communities at the heart of determining locally popular design. To deliver this, policies SA1-SA4 set out the policy framework for how the sites will come forward.



Policy SA1 – Strategic development location: Land East of Bilbrook

A strategic site for major housing growth is identified at Land East of Bilbrook, in the location shown in Appendix B of this document. By the end of the plan period, development in this location will deliver a minimum of 848 homes and a new neighbourhood that will integrate into the wider village community whilst delivering a new school for the locality. It will provide new residents with high quality connections to the existing facilities at Bilbrook and Codsall, access to leisure and recreation including along the adjacent canal towpath and sustainable access to the regionally important strategic employment site at i54 South Staffordshire and the higher order services and employment opportunities in Wolverhampton.

The release and phasing of Land East of Bilbrook will be informed by a Supplementary Planning Document (SPD) which will include an Infrastructure Delivery Strategy for the site. The development of this area will be in accordance with a masterplan and design code which will be approved as an SPD and will cover the whole of the area indicated in the relevant proforma of Appendix B.

The purpose of the Land East of Bilbrook SPD will be as follows:

1. To provide more detail on how and when the strategic requirements set out in this policy will be delivered;
2. To set a framework to guide the preparation of future planning applications;
3. To provide a framework against which future planning applications will be assessed; and
4. To enable and support the co-ordination and timely delivery of infrastructure provision

To support the housing development, it is anticipated that the Land East of Bilbrook SPD will address the delivery of the following key infrastructure and design requirements, alongside other development plan policies relevant to the site:

- A new first school to serve the needs of the Codsall and Bilbrook first school catchment, phased to ensure the timely delivery of the facility alongside other planned housing growth around the villages
- On-site retail facilities of an appropriate scale to meet the needs of the development whilst maintaining the vitality of existing centres in the adjacent village
- High quality on-site open space, green infrastructure which integrates the scheme into the existing housing recently permitted off Pendeford Mill Lane, alongside measures to ensure biodiversity net gain is achieved
- Additional off-site compensatory green infrastructure in the Green Belt to the south of the site (as indicated in Appendix B of this document)
- Highways, sustainable transport and active travel infrastructure, including links to infrastructure in the wider area and the provision of a link road between Pendeford Mill Lane, Barnhurst Lane and Lane Green Road

To enable a comprehensive and coordinated development approach, piecemeal or unplanned development proposals within the area which are likely to prejudice its delivery including the infrastructure required for the area will not be permitted. To ensure that Land East of Bilbrook is deliverable when required, the SPD will be adopted in the early years of the plan period.

Policy SA2 – Strategic development location: Land at Cross Green

A strategic site for major housing growth is identified at Land at Cross Green, in the location shown in Appendix B of this document. By the end of the plan period, development in this location will deliver a minimum of 1200 homes and a new community on a key transport corridor with excellent ties to regionally important employment sites at i54 South Staffordshire and ROF Featherstone and the services and facilities in the Black Country. This will deliver a new primary school and village centre alongside land to assist in the delivery of a new parkway to serve new and existing residents in the surrounding area.

The release and phasing of Land at Cross Green will be informed by a Supplementary Planning Document (SPD) which will include an Infrastructure Delivery Strategy for the site. The development of this area will be in accordance with a masterplan and design code which will be approved as an SPD and will cover the whole of the area indicated in the relevant proforma of Appendix B.

The purpose of the Land at Cross Green SPD will be as follows:

1. To provide more detail on how and when the strategic requirements set out in this policy will be delivered;
2. To set a framework to guide the preparation of future planning applications;
3. To provide a framework against which future planning applications will be assessed; and
4. To enable and support the co-ordination and timely delivery of infrastructure provision

To support the housing development, it is anticipated that the Land at Cross Green SPD will address the delivery of the following key infrastructure and design requirements, alongside other development plan policies relevant to the site:

- Safeguarded land to support a potential rail-based parkway along the West Coast Mainline
- On-site retail, primary education and any necessary community facilities of an appropriate scale to meet the needs of the development whilst maintaining the vitality of services and facilities in the wider area
- High quality on-site open space, green infrastructure and measures to ensure biodiversity net gain is achieved
- Additional off-site compensatory green infrastructure in the Green Belt running through the site (as indicated in Appendix B of this document)
- Highways, sustainable transport and active travel infrastructure, which will include links to infrastructure in the wider area and will align as far as possible with sustainable transport and active travel improvements proposed in the City of Wolverhampton to the south
- Delivering a layout that appropriately integrates the proposed link road between the A449 and ROF Featherstone, whilst also ensuring the development can be distinguished from the existing community at Cross Green

To enable a comprehensive and coordinated development approach, piecemeal or unplanned development proposals within the area which are likely to prejudice its delivery including the infrastructure required for the area will not be permitted. To ensure that Land at Cross Green is deliverable when required, the SPD will be adopted in the early years of the plan period.

Policy SA3 – Strategic development location: Land North of Linthouse Lane

A strategic site for major housing growth is identified at Land North of Linthouse Lane in the location shown in Appendix B of this document. By the end of the plan period, development in this location will deliver a minimum of 1200 homes¹⁰ and an on-site primary school, local centre and new neighbourhoods that are well connected to the Black Country urban area, giving new residents good access to the higher order services and employment opportunities in the adjacent towns and cities.

The release and phasing of Land North of Linthouse Lane will be informed by a Supplementary Planning Document (SPD) which will include an Infrastructure Delivery Strategy for the site. The development of this area will be in accordance with a masterplan and design code which will be approved as an SPD and will cover the whole of the area indicated in the relevant proforma of Appendix B.

The purpose of the Land North of Linthouse Lane SPD will be as follows:

1. To provide more detail on how and when the strategic requirements set out in this policy will be delivered;
2. To set a framework to guide the preparation of future planning applications;
3. To provide a framework against which future planning applications will be assessed; and
4. To enable and support the co-ordination and timely delivery of infrastructure provision

To support the housing development, it is anticipated that the Land North of Linthouse Lane SPD will address the delivery of the following key infrastructure and design requirements, alongside other development plan policies relevant to the site:

- On-site retail, primary education and any necessary community facilities of an appropriate scale to meet the needs of the development whilst maintaining the vitality of services and facilities in the wider area
- On-site open space, green infrastructure and measures to ensure biodiversity net gain is achieved, including the provision of additional off-site compensatory green infrastructure in the Green Belt to the north-east of the site (as indicated in Appendix B of this document)
- Highways, sustainable transport and active travel infrastructure, which will include links to infrastructure in the wider area and will align as far as possible with sustainable transport and active travel improvements proposed in the City of Wolverhampton to the south

To enable a comprehensive and coordinated development approach, piecemeal or unplanned development proposals within the area which are likely to prejudice its delivery including the infrastructure required for the area will not be permitted. To ensure that Land North of Linthouse Lane is deliverable when required, the SPD will be adopted in the early years of the plan period.

¹⁰ Site estimated to deliver 1976 homes in total with continued delivery beyond the plan period

Policy SA4 – Strategic development location: Land North of Penkridge

A strategic site for major housing growth is identified at Land North of Penkridge in the location shown in Appendix B of this document. By the end of the plan period, development in this location will provide a new neighbourhood where residents can easily meet their day-to-day needs using facilities within the development or Penkridge village. The scheme will be designed to be integrated into the wider village community and will include a new first school, whilst providing a sympathetic edge to the adjoining countryside to the North and the River Penk.

The release and phasing of Land North of Penkridge will be informed by a Supplementary Planning Document (SPD) which will include an Infrastructure Delivery Strategy for the site. The development of this area will be in accordance with a masterplan and design code which will be approved as an SPD and will cover the whole of the area indicated in the relevant proforma of Appendix B.

The purpose of the Land North of Penkridge SPD will be as follows:

1. To provide more detail on how and when the strategic requirements set out in this policy will be delivered;
2. To set a framework to guide the preparation of future planning applications;
3. To provide a framework against which future planning applications will be assessed; and
4. To enable and support the co-ordination and timely delivery of infrastructure provision

To support the housing development, it is anticipated that the Land North of Penkridge SPD will address the delivery of the following key infrastructure and design requirements, alongside other development plan policies relevant to the site:

- An on-site first school, retail and any necessary community facilities of an appropriate scale to meet the needs of the development whilst maintaining the vitality of services and facilities in the wider area
- High quality on-site open space, green infrastructure which integrates into existing housing permitted to the south of the site, alongside measures to ensure biodiversity net gain is achieved
- Highways, sustainable transport and active travel infrastructure, including links to infrastructure in the wider area
- Layout and design to enhance the entrance into the village, to protect the setting of the River Penk as it runs through Penkridge and to integrate into the wider landscape from the AONB to the east
- Improvements to local leisure facilities in the wider village
- Provision of a new riverside country park adjacent to the River Penk (as indicated in Appendix B of this document)

To enable a comprehensive and coordinated development approach, piecemeal or unplanned development proposals within the area which are likely to prejudice its delivery including the infrastructure required for the area will not be permitted. To ensure that Land North of Penkridge is deliverable when required, the SPD will be adopted in the early years of the plan period.

Question 7:

a) Do you support the proposed strategic housing allocations in policies SA1-SA4? Yes/No

If no, please explain your reasons for this.

b) Do you agree that given the scale of the 4 sites detailed in policies SA1-SA4, these warrant their own policy to set the vision for the site, alongside a requirement for a detailed masterplan and design code?

Yes/No

Housing Allocations

- 5.7 Housing allocations to deliver growth over the plan period in accordance with the Council's Spatial Strategy (Policy DS3) are set out in policy SA5 below. Details of the methodology for filtering site options and the assessments of allocated sites and reasonable alternatives can be found in the accompanying Housing Site Assessment Topic Paper.

SA5: Housing Allocations

Alongside the strategic development locations identified in Policies SA1, SA2, SA3 and SA4, the following housing allocations will be delivered to meet the district's housing target up to 2038. The site boundaries are set out in the relevant site proforma in Appendix C.

Village/ Town	Site Ref No.	Use	Site location	Minimum Capacity (dwellings)	Proforma Page Number
Tier 1 Settlements					
Codsall	419a&b	Residential	Land at Keepers Lane and Wergs Hall Rd	317	104
Codsall	224	Residential and station parking	Land adjacent to 44 Station Road	85	102
Codsall	228	Residential	Former Adult Training Centre off Histons Hill	29	103
Cheslyn Hay	523	Residential	Land east of Wolverhampton Road	49	110
Cheslyn Hay	119a	Residential	Land adjoining Saredon Road	60	113
Great Wyrley	141	Residential	154a Walsall Road	31	106
Great Wyrley	136	Residential, country park and allotments	Land at Landywood Lane	155	107
Great Wyrley	139	Residential	Pool View, Church Bridge	46	108
Great Wyrley	638	Residential	Loades PLC	29	112
Great Wyrley	704	Residential	Land off Norton Lane	31	109
Great Wyrley	536a	Residential (including specialist housing and school parking)	Land off Holly Lane	84	111

Penkridge	005	Residential	Land at Cherry Brook	88	115
Tier 2 Settlements					
Brewood	617	Residential	Four Ashes Road	63	118
Brewood	079	Residential (including specialist housing)	Land south of Kiddemore Green Road	43	117
Huntington	591	Residential	Land at Oaklands Farm (north of Limepit Lane)	44	121
Huntington	016	Residential	Land at Pear Tree Farm	39	120
Kinver	274	Residential	Land south of White Hill	120	123
Kinver	272	Residential	Land east of Dunsley Drive	22	125
Kinver	576	Residential	Land off Hyde Road (west)	22	124
Perton	239	Residential	Land west of Wrottesley Park Road (south)	150	127
Wombourne	416	Residential	Land off Orton Lane	57	129
Wombourne	285, 562/415, 459	Residential	Pool House Road	218	130-132
Wombourne	463 & 284	Residential	Land off Billy Bunns Lane and Gilbert Lane	223	133
Wombourne	286	Residential	Land adjacent 63 Sytch Lane	16	134
Tier 3 Settlements					
Coven	082	Residential	Land between AA49 Stafford Rd & School Lane	48	136
Featherstone	168	Residential	Land at Brinsford Lodge	81	138
Featherstone	397	Residential	Land adjacent to Brinsford Lodge, Brookhouse Lane	39	139
Pattingham	255	Residential	Land at Moor Lane	22	142
Pattingham	251	Residential	Hall End Farm	17	141

Swindon	313	Residential	Land off Himley Lane	22	144
Wheaton Aston	379	Residential	Land off Ivetsey Road	18	147
Wheaton Aston	426a	Residential	Bridge Farm: 54 Long Street	15	148
Wheaton Aston	610	Residential	Land off Marston Road/ Fenton House Lane	22	146
Other Sites Adjacent Neighbouring Towns and Cities					
South of Stafford	036c	Residential	Land at Weeping Cross (adjoining Stafford Borough)	168	149
West of Wolverhampton	582	Residential	North of Langley Road (adjoining City of Wolverhampton boundary)	390	150

All site allocations will be delivered in accordance with the individual site planning requirements set out in Appendix C and any other mitigation which is deemed necessary, through the development management process. Proposals should be consistent with other Development Management policies in the Local Plan.

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Question 8:

Do you support the proposed housing allocations in Policy SA5? Yes/No

Please reference the site reference number (e.g site 582) for the site you are commenting on in your response.

Gypsy and Travellers

- 5.8 As detailed in Chapter 4, the strategy for new Gypsy, Traveller and Travelling Showperson provision is to meet the needs of existing families that meet Planning Policy for Travellers Sites (PPTS) planning definition, as identified by the GTAA 2021 by continuing to deliver privately owned sites/pitches. The evidence supports an approach therefore of looking to allocate existing temporary or unauthorised sites to permanent (subject to other planning considerations) and looking to intensify and extend existing sites, rather than allocating wholly new sites that may have been suggested by non-travellers. It is currently not possible to test an alternative strategy of dispersing new pitch allocations more widely across the district due to a lack of site options, however we welcome views on whether there are any alternative approaches that have not been considered.
- 5.9 The GTAA identified a need for 121 pitches over the plan period for those families that meet the planning definition of Gypsies and Travellers. Where possible, the Local Plan proposes to allocate pitches to meet our families 5 year need, as reflected in the GTAA 2021 and Pitch Deliverability Study 2021. Future pitch provision beyond the 5 year requirement (including Travelling Showperson needs) will come through the Development Management process with proposals considered against a criteria based policy (see Chapter 6 – Policy HC8). Policy HC8 and any other relevant policies (e.g. DS1: Green Belt) will also be the mechanism through the Development Management process for considering those families/individuals with an identified need but do not meet the planning definition of a Gypsy, Traveller or Travelling Showperson. A need of 24 pitches over the plan period for those not meeting the planning definition was identified in the GTAA 2021.
- 5.10 Proposed allocations are informed by the Council's Pitch Deliverability Study 2021 that identifies family need, engages with families to explore what options they have, including amendments to site layout. Due to site constraints identified in the study, the current 5 year need (72 pitches) for families that meet the planning definition could not be met on all existing sites. The assessment identifies 42 deliverable pitch options which we propose to allocate. The red line boundaries of the sites have been informed by an assessment of capacity considering site licencing requirements and the land needed for access/turning and amenity buildings. Proposed allocations are set out below:

SA6: Gypsy and Traveller Allocations

Gypsy and Traveller pitches are allocated at the locations set out in the table below to meet identified family needs.

The new pitch allocations must be located within the red line boundary of the site as shown in Appendix D.

Site	Site ref no.	Total no. pitch allocations	Proforma page number
New Acre Stables, Penkridge	GT01	4	160

Granary Cottage, Slade Heath	GT05	1	155
The Spinney, Slade Heath	GT06	2	157
The Bungalow, Coven	GT07	3	156
Brinsford Bridge, Coven Heath	GT08	7	153
Brickyard Cottage, Essington	GT14	2	152
The Stables, Upper Landywood	GT17	3	158
Park Lodge, Wombourne	GT18	1	161
Glenside, Slade Heath	GT23	1	154
Kingswood Colliery, Great Wyrley	GT32	8	162
Fair Haven, Cross Green	GT33	4	159
Anvil Park, Essington	GT34	1	151
122 Streets Lane, Great Wyrley	GT35	5	163

All sites are existing established sites or direct extensions to these and are often in remote rural locations and washed over by the West Midlands Green Belt. As an exception to the planning policies relating to the location of Gypsy and Traveller pitch provision in the Green Belt, pitches identified in the Green Belt through the Local Plan will be acceptable in principle where planning applications are submitted for the specified number of additional pitches allocated in the Local Plan.

Planning applications on these sites will need to be in accordance with the criteria in Policy HC8, any site-specific planning requirements set out in Appendix D, and any other mitigation which is deemed necessary through the development management process. Proposals should be consistent with other Development Management policies in the Local Plan.

Question 9:

A) Do you support the proposed pitch allocations in Policy SA6? Yes/No

Please reference the site reference number (e.g GT01) for the site you are commenting on in your response.

B) Is there another option for meeting our gypsy and traveller needs, including any alternative site suggestions that could be considered? Yes/No

Please provide details, including a plan for new site suggestions

Employment

- 5.11 Employment land should be identified to meet the needs of all employment uses; offices, research and development, light/general industrial, and storage/distribution. The level of employment sites and premises required to meet South Staffordshire requirements over the plan period was calculated in the Council's Economic Development Needs Assessment (EDNA) 2018 and identified a demand for the district between 67-86ha.
- 5.12 Assuming the higher demand figure, the supply of employment land over the plan period is sufficient to meet this. The district's main employment areas are set out in Table 9 below which details and the amount of employment land available for the period 2018-2038 on a site specific basis:

	Site Name	Parish(es)	Site Area (Ha)	Available Land for Employment Development 2018-2038
Strategic Site	Four Ashes Industrial Estate, Four Ashes (inc. Bericote).	Penkridge. Brewood & Coven	72	10.58ha
	Hilton Cross Business Park.	Featherstone	18	4.84ha
	ROF Featherstone.	Featherstone	36	36ha
	West Midlands Interchange.	Penkridge. Brewood & Coven	297	232.5ha (excluding green infrastructure)
	i54, Wobaston Road.	Bilbrook	90.5	6.12ha
	I54 Western Extension	Bilbrook	40	40ha
	Acton Gate.	Dunston	13.7	-
	Acton Plaza.	Dunston	0.8	0.8ha
	Balliol Business Park, Wobaston Road.	Bilbrook	6.6	-
	Coppice Lane, Cheslyn Hay.	Cheslyn Hay	7.3	-
	Dunston Business Village.	Dunston	2.1	-
	Essington Light Industrial Estate, Bognop Road.	Essington	0.8	-
	Hawkins Drive Industrial Estate.	Cheslyn Hay	12	0.25ha
	Hepworth Site, Warstones Road.	Essington	3.8	-
	Heathmill Road Industrial Estate.	Wombourne	19.3	-
	Hilton Main Industrial Estate	Featherstone	7.07	
	Vernon Park	Featherstone	5.7	2.8ha
	Hobnock Road, Essington.	Essington	5.2	5.2ha
	Huntington Industrial Estate.	Huntington	1.1	-
	Kingswood Business Park.	Perton	1.0	-
	Landywood Enterprise Park	Great Wyrley	3.4	-
	Landywood Lane Industrial Estate.	Cheslyn Hay	6.5	-
	Little Business Park, Littleton Drive.	Huntington	2.7	-
	Loades plc., Gorsey Lane.	Great Wyrley	1.1	-

	Ounsdale Road Industrial Estate.	Wombourne	2	0.9ha
	Owens Trading Estate, Wobaston Road.	Bilbrook	7.1	-
	Paradise Lane, Slade Heath.	Featherstone	3.1	-
	Former Sandvik Site, Brinsford	Featherstone	2.2	-
	Smestow Bridge Industrial Estate.	Wombourne	21.1	-
	Wolverhampton Business Airport.	Bobbington	1.7	-
	Wombourne Enterprise Park.	Wombourne	3.9	-
			TOTAL	340ha

Table 9: South Staffordshire Employment stock

- 5.13 Table 9 uses 2018 as a base date as this is the start of the plan period and the year that the need was assessed in the EDNA. As such, this reflects available employment land from 2018 up to 2038, however some of the available land may now be developed or is being developed. The figures includes new employment land that has become available since 2018, which is limited to West Midlands Interchange (WMI). The figure for the available land at WMI reflects the proposed built area minus the area set aside for green infrastructure.
- 5.14 WMI already has consent through the Development Consent Order (DCO) process and was assessed through our EDNA Part 2: Economic Land Availability Assessment and Employment Site Assessment Topic Paper, confirming it's suitability. Given this, and the unmet needs within the wider FEMA, it is considered that the exceptional circumstances for the release of the site from the Green Belt exist. It is therefore proposed that WMI is allocated and removed from the Green Belt, with it anticipated that it is built out by the end of the plan period.
- 5.15 Allocating WMI helps strengthen the portfolio of employment land in the district over the plan period, including a mix of land for strategic warehousing (WMI), advanced manufacturing (i54) and general high quality employment (ROF Featherstone). These are balanced by land for smaller scale employment opportunities (Hilton Cross) and further complemented by smaller scale employment land availability in the wider FEMA. The Council will continue to work positively with the developers on WMI to ensure the site come forward in accordance with the DCO and delivers the best scheme possible.

Policy SA7 - Employment Allocation – West Midlands Interchange

A total of 297Ha of additional land is allocated for employment development, alongside associated landscaping and strategic green infrastructure within the District’s administrative area. This total is covered by a single site only at West Midlands Interchange (WMI) as specified below, together with details of the type of employment development that will be promoted upon the site.

Site Reference	Site Name	Parish	Area (Ha)	Employment Type (Use Class ¹)
E33	West Midlands Interchange (WMI).	Penkridge. Brewood & Coven	297	B8

¹ As defined by the [Town and Country Planning \(Use Classes\) Order 1987 \(as amended\)](#).

WMI employment site allocation is for a Strategic Rail Freight Interchange (SRFI) and will be progressed in-line with the [Development Consent Order](#) (DCO) that granted permission on 4 May 2020.

In order to meet the employment land development needs of the District, the land benefiting from the approved DCO at WMI will be removed from the Green Belt. This excludes the land specified for Green Infrastructure provision in the DCO adjacent the Canal Conservation Area and the country park to the south of Vicarage Road which will remain as Green Belt to provide compensatory improvements for the land removed for development. This is indicated on the Policies Map in Appendix E and will see 232.5ha of land removed from the Green Belt.

Question 10:

Do you support the proposed allocation in Policy SA7? Yes/No

6. Development Management Policies

- 6.1 In addition to delivering growth to meet new development needs, a key part of the Local Plan Review is reviewing the policy requirements set for all development in South Staffordshire, to ensure that future growth is sustainable and responds to the District's needs.
- 6.2 As part of this process, the Council considered a wide variety of alternative policy options as part of the 2018 Local Plan Review - Issues and Options consultation. This set out the Council's different options for addressing different policy areas that the Local Plan Review would need to address and sought views from local communities, developers and key stakeholders on these.
- 6.3 Where relevant to the proposed policy approach, the nearest corresponding policy option considered in the 2018 Local Plan Review - Issues and Options consultation has been highlighted. The Council assessed these policy options and reasonable alternatives through the Sustainability Appraisal of the Issues and Options consultation. However, in the vast majority of cases there was very little or no predicted difference in the Sustainability Appraisal between the relevant options, so in most cases the preferred policy approaches have been led by the recommendations of the emerging Local Plan Review evidence base documents and joint working with key statutory stakeholders.
- 6.4 The preferred policy approaches the Council intends to take forward are set out below. At this stage, these preferred approaches do not reflect the final policy wording that will be included in the Local Plan Review that will be submitted to the Secretary of State. Instead they are intended to highlight key requirements, aims and measures that the final submitted policies will deliver, focusing on the most important parts of the future policies to seek views on these.
- 6.5 The preferred policy approaches, or directions of travel, are set out in the tables below. Policies have been grouped under key themes, with a short explanation of key evidence that informed the Council's preferred approach to these policies given in summary under each of these.

Homes and Communities

Delivering the right homes		
Policy Reference	Proposed Direction of Travel	Corresponding 2018 Issues and Options policy options
HC1 - Housing Mix	<ul style="list-style-type: none"> All development to provide a mixture of property sizes, types and tenures Proposals for major residential development¹¹: <ul style="list-style-type: none"> Market housing – 75% of properties to have 3 bedrooms or less, with specific breakdown to be determined with reference to latest Housing Market Assessment Affordable housing – Specific breakdown to be determined with reference to latest Housing Market Assessment and other affordable housing needs evidence Refusal of proposals that fail to make an efficient use of land by providing a disproportionate amount of large, 4+ bedroom homes 	<ul style="list-style-type: none"> A combination of Housing Mix Policy Options A & B
HC2 - Housing Density	<ul style="list-style-type: none"> Aim to achieve a minimum net density of 35 dwellings per net developable hectare in developments within or adjoining Tier 1 settlements, in infill locations within the development boundaries of other settlements in the district or in urban extensions to neighbouring towns and cities 	<ul style="list-style-type: none"> n/a (asked as a separate question - Question 17 - in the 2018 Issues and Options consultation)
HC3 - Affordable Housing	<ul style="list-style-type: none"> Proposals for major residential development: <ul style="list-style-type: none"> 30% of all dwellings to be affordable housing, broken down using the following ratio 50% social rent, 25% shared ownership and 25% first homes¹² Affordable homes to be fully integrated, via suitable peppercotting in clusters across the development and design which is materially indistinguishable from market housing Grant funding not supported for affordable housing required by the policy Offsite and financial contributions only acceptable in exceptional circumstances Proposals that comply with up to date policies in the plan assumed to be viable 	<ul style="list-style-type: none"> Affordable Housing Percentage Requirement Policy Option A Affordable Housing Tenure Split Policy Option D Affordable Housing Boosting Supply Policy Option H

¹¹ Major residential development is defined in the 2019 National Planning Policy Framework as “development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more”.

¹² Subject to viability testing through the Local Plan Review evidence base

	<ul style="list-style-type: none"> • Adopt an Affordable Housing SPD to further clarify the Council's expectations for the delivery of affordable housing 	
HC4 - Homes for Older People	<ul style="list-style-type: none"> • Proposals for major residential development: <ul style="list-style-type: none"> ○ Requirement to make a clear contribution to meeting the needs of the district's ageing population, through the provision of either: general needs properties for older people e.g. bungalows, other ground floor accommodation with appropriate age restrictions on occupation; or specialist housing e.g. sheltered, extra care homes ○ 30% of all market and affordable homes to meet Building Regulations Standard Part M4(2) – Accessible and adaptable dwellings 	<ul style="list-style-type: none"> • Blended approach of Homes for Older People and Specialist Housing Policy Options A & D
HC5 - Specialist Housing Schemes	<ul style="list-style-type: none"> • Strong support for proposals for specialist housing of all tenures, in the form of age-restricted accommodation, retirement homes, sheltered and/or extra-care housing, nursing/residential homes or other forms of supported living, subject to sustainability and design criteria • Resistance to loss of specialist accommodation unless needed to increase quantity or quality of existing provision 	<ul style="list-style-type: none"> • Homes for Older People and Specialist Housing Policy Options A
HC6 - Rural Exception Sites	<ul style="list-style-type: none"> • Support for sites that lie adjacent to a village falling within Tiers 1-4 of the settlement hierarchy • Affordable housing need in the parish to be demonstrated through a robust, independent housing need survey which considers all tenures of affordable housing in NPPF definition, carried out within the last 3 years, in partnership with the Parish Council and a Rural Housing Enabler • Proposals to be of a suitable size, scale, design and character in relation to the existing village • Occupancy to be secured in perpetuity for local people in affordable housing need • Small amount of market housing permitted in proposals outside the Green Belt where essential to viability of scheme 	<ul style="list-style-type: none"> • Rural Exception Sites Policy Option A
HC7 - Self & Custom Build Housing	<ul style="list-style-type: none"> • Support for self-build and custom housebuilding proposals where they accord with other development plan policy requirements • Sites for major residential development to have regard to any need identified on the self-build and custom housebuilding register, with provision to be agreed on a site-by-site basis 	<ul style="list-style-type: none"> • Self-build and Custom House Building Policy Option A
HC8 - Gypsy, Traveller and Travelling Showpeople	<ul style="list-style-type: none"> • Criteria based policy that all proposals for Gypsy and Traveller pitches/plots must conform to covering: Access to essential services (waste, water, power etc); safe access for towing caravans; development well designed and landscaped; no net loss of biodiversity; protecting neighbouring amenity; avoiding areas of high flood risk 	<ul style="list-style-type: none"> • Gypsies, Travellers & Travelling Showpeople Policy Option A

	<p>and requiring the number and size of pitches to be of an appropriate scale and not dominate the nearest settlement.</p> <ul style="list-style-type: none"> • Policy to confirm that applications for pitches from individuals that don't meet the planning definition will be considered in line with this criteria based policy and other relevant policies (e.g Policy DS1:Green Belt; DS2: Open Countryside) on a case by case basis. 	
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- 6.6 Amongst other issues, South Staffordshire has an increasingly ageing population, high levels of under-occupation of the existing housing stock and a generally unaffordable housing stock, with average house prices costing over eight times the average lower quartile income. As the District will experience significant housing growth through the Local Plan Review and it is important that the district puts in place policies to ensure any growth responds to such issues, creating mixed and sustainable communities for all residents.
- 6.7 To achieve this, policy approaches are proposed to ensure a mix of property sizes and tenures are delivered in new development, including affordable housing. These include clear requirements to ensure that any development reflects the latest needs set out in the Strategic Housing Market Assessment 2021. These requirements also include a particular emphasis on avoiding a disproportionate amount of large dwellings on new schemes, to avoid the risk of development exacerbating existing under-occupation of market housing in the District. This is supported by a minimum density requirements policy, which reflects the findings of regional evidence on unmet housing needs, the Council's own evidence base on appropriate densities delivered within the district and the more sustainable locations identified in the Council's Spatial Strategy.
- 6.8 Policy approaches are set out to allow the district to meet its housing needs for the elderly population, both as part of wider housing sites and as part of targeted specialist housing schemes. These include requirements to encourage the provision of properties both designed and managed to accommodate the district's elderly population, ensuring that allocated general housing sites contribute towards specialist housing supply and responding to the support for such an approach in the South Staffordshire Housing and Homelessness Strategy. To ensure that elderly residents who remain within the general housing stock are also catered for, a proportion of all new dwellings will also be designed to be compliant with optional technical requirements for accessible and adaptable homes. For specialist housing schemes, such as extra care or nursing homes, a policy approach supporting the delivery of such schemes is proposed, including an additional requirement that existing specialist housing will be retained for its current use. Taken together, these approaches will allow elderly residents to be better catered for in the general housing stock for longer, whilst also encouraging the provision of a range of specialist options for residents with a variety of care needs.
- 6.9 A clear requirement and tenure split is also set for affordable housing. This reflects the evidence in the latest Strategic Housing Market Assessment 2021, the Council's Local Plan Review Viability Study 2021 and the emerging first homes requirements set out national policy. This policy approach also sets clear design requirements to ensure that such dwellings are well-integrated into the wider scheme, are genuinely 'tenure-blind' in design and are not consigned to the least attractive areas of a housing site. The Local Plan Review will also continue to offer support for affordable housing brought forward in rural exception

sites, offering clear guidance about the process by which these should be identified and the locations in the district where these could be sustainably accommodated.

- 6.10 A policy approach is also set out above to respond to more recent national requirements for local authorities to respond to any identified need for people wishing to commission or build their own homes. Given the limited level of unmet demand identified on the Council's Self and Custom Build Register to date, a flexible policy approach has been adopted. This firstly encourages the provision of windfall self and custom build schemes, where these would be consistent with other development plan policies, ensuring that suitable schemes will receive clear support from the Council. In addition, to ensure the plan can respond flexibly if the need for such plots increases in the future, a requirement is introduced for general housing schemes to have regard to the findings of the register on a site-by-site basis.
- 6.11 In response to the district's needs for Gypsy, Traveller and Travelling Showpeople pitches or plots, a criteria based policy is proposed. This is intended to reflect the national policy requirements for such policies to be fair and to facilitate the traditional and nomadic life of travellers while respecting the interests of the settled community. To achieve this, this policy approach will ensure that new sites/pitches are located in the right areas, are well designed, function effectively, and meet the needs of our Gypsy, Traveller and Travelling Showpeople communities', whilst also protecting the amenity of neighbouring residential areas, the Green Belt and landscape of the district.

Key evidence

- Strategic Housing Market Assessment 2021
- Housing and Homelessness Strategy 2018
- Housing Density Topic Paper 2021
- Specialist Housing: Local Need and Site Allocations Topic Paper 2021
- Greater Birmingham Housing Market Area Strategic Growth Study 2018
- Local Plan Review Viability Study 2021
- Self and Custom Build Register
- Gypsy and Traveller Accommodation Assessment 2021
- Pitch Deliverability Study 2021

Design and space standards		
Policy Reference	Proposed Direction of Travel	Relevant 2018 Issues and Options policy options
HC9 - Design requirements	<p>The policy will introduce a new set of requirements to ensure high quality design and creation beautiful places, which will require all new development to:</p> <ul style="list-style-type: none"> • Take account of any relevant requirements in the latest South Staffordshire Design Guide SPD, Shop Front Design Guide SPD or any design code or Conservation Area Management Plans relevant to the site • Reflect the positive features that make up the character of the local area, enhancing and complementing the site's surroundings • Require all developments to incorporate tree lined streets • Positively respond to existing landform, layout, building orientation, massing and landscaping • Use land efficiently whilst respecting existing landscape and settlement character • Provide a clear and permeable hierarchy of streets, routes and spaces which incorporate a variety of green infrastructure through the development • Give safe and convenient ease of movement to all users • Provide access to local services and facilities • Provide a range of house types and tenures • Deliver tenure-blind housing for market and affordable properties, including the surrounding landscaping and public realm • Integrates with any adjacent future planned development in the local area • Clearly define public and private spaces • Ensure that streets and other public spaces are well overlooked, whilst seeking to deliver wider Secure by Design principles, where practicable and consistent with other design objectives • Accommodates car parking, cycle and bin storage using imaginative solutions that do not detract from the streetscene • Deliver a high quality and well-maintained public realm that supports active recreation and travel <p>To promote high quality design, the policy will also:</p> <ul style="list-style-type: none"> • Require Design and Access Statements on all planning applications, which should be proportionate to the scale and complexity of the development 	<ul style="list-style-type: none"> • Blended approach of Design and Residential Amenity Policy Options A, B & C

	<ul style="list-style-type: none"> • Include a policy hook for local design codes to be prepared for specific areas of the District following adoption of the Local Plan • Identify specific strategic site SPDs and design codes to deliver the strategic development locations at Land East of Bilbrook, Land at Cross Green, Land North of Linthouse Lane and Land North of Penkridge • Require other adjacent or closely related sites with similar delivery timescales to prepare a framework plan to show how a comprehensive and integrated layout could be achieved alongside other sites in the area 	
HC10 - Protecting residential amenity	The policy will retain the existing approach set out in Policy EQ9 of the adopted Core Strategy .	<ul style="list-style-type: none"> • n/a
HC11 - Space about dwellings and internal space standards	<ul style="list-style-type: none"> • The Policy will retain the existing external space about dwellings standards set out in Appendix 6 of the adopted Core Strategy • As a replacement to the existing internal space standards set out in the adopted Core Strategy, all properties will now be required to meet the government's Nationally Described Space Standard 	<ul style="list-style-type: none"> • Space About Dwellings Policy Option A • Internal Space Policy Option C
HC12 - Parking Standards	<ul style="list-style-type: none"> • Parking standards to be carried forward from the adopted Core Strategy • In addition to the existing standards, electric vehicle charging standards will be introduced to achieve the following on new development: <ul style="list-style-type: none"> - Houses: One 7kW (or better) charge point per dwelling - Residential Flats/ C2 institutional accommodation: 20% of available spaces to be fitted with 7kw (or better) charge point and 20% of available spaces to be provided with power supply to allow for additional fast charge socket in future - Commercial Development: 20% of available spaces to be fitted with 7kw (or better) charge point and 20% of available spaces to be provided with power supply to allow for additional fast charge socket in future <p>We feel that this approach strikes the correct balance between meeting the parking needs of residents, avoiding unnecessary on street parking, ensuring good design and reducing the impacts of climate change.</p>	<ul style="list-style-type: none"> • Blended approach of Residential Parking Policy Options E & F

6.12 South Staffordshire is characterised by a rural landscape containing a diverse collection of villages of differing built character, with no one dominant town or city within the District. As the District is expected to accommodate significant growth during the plan period, it is imperative that there are strong design policies and mechanisms in place to ensure that new development enhances the existing character of the District and provides a good quality of

life to existing and future residents. It has therefore been necessary to update the design requirements policy in the Local Plan Review, to ensure focuses on the design issues most likely to face the Council in delivering development through the Local Plan Review.

- 6.13 The Council already has a number of design guides which it uses to ensure that new development responds appropriately to the diverse built character across the District. These currently include the District Design Guide, the Shopfront Design Guide and the Conservation Area Management Plans. However, with the change in the scale of development across the District and the increasing emphasis on design in national policy, it is clear that other tools will be required through the Local Plan Review to ensure beautiful and high quality design across the District. To ensure large scale developments have a comprehensive layout that is phased appropriately to deliver the necessary on-site retail, education facilities and green infrastructure, Supplementary Planning Documents are proposed for the four largest sites in the Local Plan Review. These will include site specific masterplans and design codes, recognising the requirements of the government's emerging National Model Design Code. In addition, the future design policy will highlight which other areas of the District will have their own design codes, once greater clarity regarding the use of design codes in rural areas is offered by the government. This mixture of approaches recognises the additional benefits that design codes and masterplanning can provide compared to standard design policy requirements¹³, whilst ensuring the use of such tools can be prioritised to the areas and types of site where they will be of most benefit.
- 6.14 It is also important that key design standards from the Council's existing Core Strategy are reconsidered to ensure they respond effectively to emerging issues. Given their importance in securing adequate separation distance and private amenity space between dwellings, the Council is proposing to retain the existing policies concerning residential amenity and the Space About Dwellings standards set out in Appendix 6 of the Core Strategy. However, because of changes in national policy, it will be necessary to replace the existing internal floorspace standards with the government's Nationally Described Space Standard, in line with the latest government guidance.
- 6.15 Due to the findings of the District's climate change evidence base and the government's intention to transition to electric vehicles, it will be necessary to update the existing parking standards to ensure on-plot charging facilities are provided with each new dwelling and on other non-residential developments. This is especially important as the District's climate change evidence base identifies road transport as South Staffordshire's biggest generator of carbon emissions by some distance, albeit this is in part due to the motorways that run through the District. The majority of the District's residents also drive to work, often in neighbouring towns and cities outside of the District. Whilst the location of development in proximity to bus and rail services may help to lessen this impact to some extent it is still vital that electric vehicle infrastructure is provided to improve air quality and to allow residents can access jobs in a sustainable manner.

Key evidence

- National Design Guide - Ministry for Housing, Communities and Local Government
- National Model Design Code: Consultation Proposals – Ministry for Housing, Communities and Local Government
- District Design Guide 2018, including the Shop Front Design Guide
- Conservation Area Management Plans

¹³ Section 3.37 of the 2018 Local Plan Review Issues and Options Sustainability Appraisal

- Historic Environment Site Assessment
- Climate Change Adaptation & Mitigation – Final Report October 2020
- Climate Change Adaptation & Mitigation – Baseline Report October 2020
- Appendix 5 of the 2012 Core Strategy
- Air Quality Annual Status Report 2019
- Technical Housing Standards – Nationally Described Space Standard – Department for Communities and Local Government March 2015
- Appendix 6 of the 2012 Core Strategy

Promoting successful and sustainable communities		
Policy Reference	Proposed Direction of Travel	Relevant 2018 Issues and Options policy options
HC13 - Health and Wellbeing	<ul style="list-style-type: none"> All development should be designed to maximise the positive impact on promoting health and wellbeing and supporting healthy communities Large developments (150+ dwellings) are also required to demonstrate through Design and Access Statements how specific measures have been designed into the development to have a positive impact on the health and wellbeing of residents. Include policy hook for a health and wellbeing SPD that will provide further detailed guidance on how the Council expects health and wellbeing benefits to be delivered through specific design interventions. 	<ul style="list-style-type: none"> Blended approach of Health and Wellbeing Policy Options A & B
HC14 - Health Infrastructure	<ul style="list-style-type: none"> Existing healthcare infrastructure to be protected. Proposals for major residential developments must be assessed against the capacity of existing healthcare facilities through engagement with the relevant Clinical Commissioning Group (CCG), Where it is determined that the development results in an unacceptable impact on these facilities then a proportionate financial contribution will be sought agreed through engagement with the CCG. In the first instance, any infrastructure contributions will be sought for existing facilities. 	<ul style="list-style-type: none"> n/a – informed by joint working with key infrastructure providers
HC15 - Education	<ul style="list-style-type: none"> Existing education infrastructure to be protected New education infrastructure to be required from new development in line with the latest Staffordshire Education Infrastructure Contributions Policy 	<ul style="list-style-type: none"> n/a – informed by joint working with key infrastructure providers
HC16 - South Staffordshire College	Retain existing policy set out in the adopted Core Strategy (Policy EV4), with the exception of removing reference to Masterplan.	<ul style="list-style-type: none"> n/a (asked as a separate question - Question 49 - in the 2018 Issues and Options consultation)
HC17 - Open Space	<ul style="list-style-type: none"> Existing open spaces will be protected Require 0.006 hectares of multi-functional, centrally located open space per dwelling, with the threshold for on-site provision being required where new development would generate a need for 0.2ha of open space or more (i.e sites of 33 dwellings or above would require on site open space provision) 	<ul style="list-style-type: none"> Leisure Facilities Policy Option B Question 77 in the 2018 Issues and Options consultation

	<ul style="list-style-type: none"> On-site open space should include equipped play provision as a default Require sites of between 10 and 33 dwellings will be required to provide an offsite financial contribution equivalent to the amount of open space that would otherwise be required on-site Clarify that small incidental green infrastructure without a clear recreational purpose (e.g. landscape buffers, highways verges) should not be used to meet the quantitative on-site open space standard Further guidance on the procedure for determining provision required from new development will be set out in an Open Space, Sport and Recreation SPD 	<ul style="list-style-type: none"> Children’s Play and Youth Development Policy Option A
HC18 - Sports Facilities and Playing Pitches	<ul style="list-style-type: none"> Existing sports facilities and playing pitches will be protected Major developments will determine required provision through use of the latest Playing Pitch Calculator and Sports Facilities Calculator provided by Sport England, informed by the recommendations of both the Indoor Sports Facilities Strategy 2020 and the Playing Pitch Strategy 2020 Further guidance on the procedure for determining provision required from new development will be set out in an Open Space, Sport and Recreation SPD 	<ul style="list-style-type: none"> Leisure Facilities Policy Option B
HC19 - Wider green infrastructure design principles	<ul style="list-style-type: none"> Introduce a policy to ensure opportunities to introduce green infrastructure provided to meet open space, biodiversity, active travel, climate mitigation/adaptation and sustainable drainage are integrated together within a scheme in a genuinely multi-functional manner, where this can be achieved in a manner consistent with other local design policies. Further strategic guidance on green infrastructure provision to be set out in a Green Infrastructure SPD 	<ul style="list-style-type: none"> n/a

6.16 It is important that the Local Plan Review provides the social and green infrastructure to provide existing and future residents with the facilities they need. As part of this process, the Council continues to work closely with stakeholders from NHS England and local Clinical Commissioning Groups to ensure that there is capacity in local primary health care infrastructure for future development, securing contributions from development towards necessary improvements where required. It also works closely with the Education Authority (Staffordshire County Council) to ensure new school infrastructure is provided by developments and will continue to use the Staffordshire Education Infrastructure Contributions Policy to ensure this is provided in future. As part of the District’s education offer development associated with the use of South Staffordshire College (Rodbaston) as an education and training establishment will continue to be supported.

6.17 To support the Local Plan, a number of evidence base documents have been prepared to identify the scale of open space, sports and recreation facilities needed to support future housing growth in the District. The preferred policy approaches and standards set out above

have been informed by the recommendations of these studies to ensure that, where there is a local need identified in the relevant strategy, development can make a contribution to providing the relevant facilities and open spaces. They also include the relevant protections to ensure existing facilities are protected from development, in line with national policy. Recognising the need to ensure that green infrastructure is designed in a truly co-ordinated and multi-functional way, a green infrastructure policy has also been introduced to make it clear that such elements should be integrated together within scheme design, rather than being designed in isolation from one another.

Key evidence:

- Staffordshire Education Infrastructure Contributions Policy
- Open Space Audit Assessment Report October 2019
- Open Space Study Standards Paper January 2020
- Playing Pitch Strategy Assessment Report January 2020
- Playing Pitch Strategy & Action Plan September 2020
- Indoor Sports Facilities Needs Assessment Final Report January 2020
- Indoor Sports Facilities Strategy February 2020
- Infrastructure Delivery Plan 2021

Economic Vibrancy

Building a strong local economy		
Policy Reference	Proposed Direction of Travel	Relevant 2018 Issues and Options policy options
EC1 - Sustainable economic growth	<ul style="list-style-type: none"> Policy will ensure that there is a sufficient supply of employment land to meet the needs of the economy, to encourage inward investment and to support identified and potential growth sectors such as advanced manufacturing including Auto-Aero and Agri-Tech. Growth to be focussed at the currently identified employment areas and the recently approved West Midlands Interchange. Continue to support the delivery of strategic employment sites at West Midlands Interchange, Four Ashes, I54, Hilton Cross and ROF Featherstone. Support opportunities for employment development within the Tier 1 and Tier 2 villages identified within the settlement hierarchy subject to other policy requirements including ensuring proposals do not have an unacceptable impact on local amenity. Promote the diversification of the economy in rural areas where compatible with other plan policies Support measures to provide necessary infrastructure Preference given to the use of previously developed land except where this would result in significant biodiversity loss. Promote the provision of active travel measures and the creation/enhancement of multifunctional green spaces and the enhancement of the Green Infrastructure Network. 	<ul style="list-style-type: none"> Employment Sites Policy Option A
EC2 - Retention of employment sites	<p>Policy would seek to protect existing designated employment areas set out in Table 9 at paragraph 5.12 and to be reflected on the policies maps.</p> <p>Loss will not be permitted unless:</p> <ul style="list-style-type: none"> Site has been marketed for employment uses without success for a minimum of twelve months. Redevelopment would result in significant economic benefits <p>Alternative uses must not prejudice continued operation and viability of existing/allocated employment areas. Strong presumption in favour of retaining strategic employment sites for employment uses.</p>	<ul style="list-style-type: none"> Employment Sites Policy Option A

EC3 - Inclusive Growth	Policy to require applicants to submit an Employment and Skills Plan (ESP) for developments of 100 or more residential units or 5000sqm of commercial floorspace. Delivery of the ESP secured through a Section 106 agreement or via a planning condition where it is considered appropriate to do so.	<ul style="list-style-type: none"> Inclusive Growth Policy Option C
EC4 - Rural employment and tourism	Retain existing policy approach of supporting rural diversification with a preference for development within existing development boundaries. Development outside existing villages to be primarily restricted to opportunities relating to reusing existing buildings. Rural Development SPD to give greater guidance of nature of business case requirements.	<ul style="list-style-type: none"> Rural Employment and Tourism Policy Option A
EC5 - Agricultural workers dwellings and equine related development	<p>Agricultural:</p> <ul style="list-style-type: none"> Retain broad principles of existing policy approach set out in the adopted Core Strategy (Policy EV8). Include reference to a Rural Developments SPD which will provide detailed guidance on barn conversion, equine development and polytunnels. Rural workers dwellings policy approach to be retained however reference the requirement for an essential need to be demonstrated. <p>Equine</p> <ul style="list-style-type: none"> Retain broad principles of existing policy approach set out in the adopted Core Strategy (Policy EV7). Include reference to Rural Development SPD to offer further guidance on implementation of the policy. 	n/a

6.18 South Staffordshire currently contains four existing freestanding strategic employment sites at i54, ROF Featherstone, Hilton Cross and Four Ashes, which accommodate a large proportion of the District's employment land supply and have good access to the strategic road network. The employment offer on the larger freestanding sites is balanced by a number of smaller industrial estates located both within some of the District's existing settlements and in the wider functional economic market area (e.g. the urban area of the Black Country). Within the wider rural area, employment, tourism and recreation opportunities are driven by appropriate rural diversification and small-scale start-up businesses.

6.19 Recognising the range of employment opportunities across the District, multiple policy approaches are proposed to allow for sustainable employment growth within the District. Firstly, a sustainable economic growth policy is set out, indicating how the Council will encourage growth, key growth sectors, the types of locations that new employment growth will be permitted within and how this will be done in an environmentally sensitive manner. As part of this policy the newly consented strategic rail freight interchange known as West Midlands Interchange is recognised as a new freestanding strategic employment site, recognising the scale and strategic location of the site, alongside the substantial additional employment land it contributes to the Council's supply. A corresponding policy approach to protect existing sources of employment is also proposed unless specific tests are met,

recognising the importance of safeguarding these sites to meet the employment needs of residents both within and outside of the District.

- 6.20 To ensure that growth benefits the local communities located in close proximity to it, a policy approach is proposed to secure an Employment and Skills Plan on large scale housing and employment schemes. This will allow such proposals to support upskilling in the local area, providing a strong and skilled workforce that benefits both local businesses and residents, whilst also helping to encourage more sustainable commuting patterns by encouraging local residents to work more locally within the District.
- 6.21 In the District’s wider rural area, the existing policy approaches to tourism, rural diversification and agriculture will be largely retained, recognising the need for such approaches to sensitively managing the growth of such uses alongside the rural area’s sensitive landscapes and habitats, alongside the extensive Green Belt coverage in many such areas. However, to provide greater clarity and guidance to applicants, a Rural Developments SPD will be prepared, to offer greater guidance on the appropriate siting, scale and design of such proposals. Continuing to prioritise delivering tourism and rural diversification in existing development boundaries and through the re-use of existing buildings reflects the greater level of protection such an approach may offer the District’s landscapes and habitats¹⁴.

Key evidence

- Economic Development Needs Assessment Part 1 August 2018
- Economic Development Needs Assessment Part 2: Economic Land Availability Assessment 2021
- Stoke-on-Trent & Staffordshire Strategic Economic Plan April 2018
- Stoke-on-Trent and Staffordshire Local Enterprise Partnership Growth Deal 1-3
- Destination Staffordshire Tourism Review, Strategy and Action Plan
- A Tourism Strategy for South Staffordshire

¹⁴ Section 3.47 of the 2018 Local Plan Review Issues and Options Sustainability Appraisal

Community services, facilities and infrastructure		
Policy Reference	Proposed Direction of Travel	Relevant 2018 Issues and Options policy options
EC6 - Retail	<p>Policy will:</p> <ul style="list-style-type: none"> Identify three tier hierarchy (Large Village Centres, Village Centres and Neighbourhood Centres) as recommended in the Retail Centres Study 2021 (para.7.31). On site retail in strategic growth areas may be justified where this does not conflict with existing retail provision. Introduce Impact Test threshold of 500 sqm for new retail provision (consider a 300sq.m. threshold for comparison floorspace). Support residential development within village centres only where this doesn't result in the loss of essential services or facilities (including retail services) and where it would not create a concentration of non-centre uses or result in a change to the retail character of the surrounding area. 	<ul style="list-style-type: none"> Village Centres and Retail Policy Option A
EC7 - Protecting community services and facilities	<p>Policy will retain the existing approach set out in the adopted Core Strategy (Policy EV9). Support the provision of new services and facilities. Seek to protect against the loss of existing services particularly where this is the sole or last remaining facility.</p>	<ul style="list-style-type: none"> Protecting Community Services and Facilities Policy Option A
EC8 - Wolverhampton Halfpenny Green Airport	<p>Policy will maintain the existing approach set out in the adopted Core Strategy (Policy EV13). Supporting development proposals related to general aviation and the existing businesses but only within the developed area of the site as defined by the current policies map.</p>	<ul style="list-style-type: none"> Wolverhampton Halfpenny Green Airport Policy Option A
EC9 - Infrastructure	<p>Policy will commit the council to working with infrastructure providers, agencies, organisations and funding bodies to enable, support and co-ordinate the delivery of infrastructure to support the delivery of the growth identified within the Local Plan and offer policy support for other infrastructure requirements set out in the Council's Infrastructure Delivery Plan.</p>	<ul style="list-style-type: none"> Infrastructure Policy Option A
EC10 - Developer contributions	<p>Policy will retain commitment to using s106 payments to fund all types of infrastructure. Specific infrastructure requirements will be identified in relevant policy areas and site proformas.</p>	<ul style="list-style-type: none"> Infrastructure Policy Option A
EC11 - Sustainable transport	<p>The policy will:</p> <ul style="list-style-type: none"> Promote joint working between the District, County Council and neighbouring highways authorities on sustainable transport measures, including active travel 	<ul style="list-style-type: none"> Public Transport and Highway Network Policy Option A

	<ul style="list-style-type: none"> • Support strengthening bus/rail services and connections to these services in response to increased demand from new development • Commit the District/County Council to preparing Local Walking & Cycling Infrastructure Plan to identify strategic opportunities for walking and cycling improvements within the District • Ensure development is designed to promote high quality walking and cycling, both within sites and to links to nearby services and facilities • Require new cycle infrastructure to be compliant with Local Transport Note 1/20, or subsequent updates • Support the widespread delivery of electric vehicle charging points through new development, through the revision of existing car parking standards • Provide support for the delivery of a rail-based park and ride within the Land at Cross Green strategic development location identified in Appendix B of this document 	
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6.22 The District's services and facilities are spread across the various rural communities spread throughout South Staffordshire, with no central town or city to form the focus for provision or investment. To ensure the proper protection and recognition of retail within the District, a retail centres hierarchy and retail impact assessment threshold have been established using a thorough study of the District's existing centres. To maintain the vitality and sustainability of the District's communities protections have also been retained for the District's existing facilities and services, alongside delivery mechanisms to fund and deliver new facilities through developer contributions and joint work with infrastructure providers. Recognising its role in contributing to the District's employment offer, a policy seeking to retain and enhance the existing extent of Wolverhampton Halfpenny Green Airport has also been retained.

6.23 The Council's climate change evidence base shows that transport continues to be a significant source of the District's carbon emissions and it is vital for the plan to provide mechanisms to address this issue. The District is heavily reliant on neighbouring towns and cities for employment and higher order services, so it is necessary to provide a range of sustainable transport measures that seek to reduce the District's carbon emissions whilst recognising this interrelationship. Recognising these relationships, the sustainable transport policy supports the shift towards electric vehicles, alongside the longer-term delivery of a rail-based parkway within the District, recognising the role both of these measures could play in reducing carbon emissions associated with accessing employment and facilities outside of the District.

6.24 The sustainable transport policy seeks to deliver new walking and cycle provision in line with the government's design standards, whilst recognising the need to align planned improvements with walking and cycling improvements planned in neighbouring towns and cities. There are ambitious plans to expand the walking, cycling, rail and metro network in the Black Country so it is important that any future improvements in South Staffordshire

plan to align with these wherever possible. The Council will work with Staffordshire County Council and Black Country partners to ensure that the local walking and cycling evidence base is updated to reflect the needs of the District and the planned improvements adjacent to its borders.

Key evidence

- Rural Services and Facilities Audit 2019
- Retail Centres Study April 2021
- Infrastructure Delivery Plan 2021
- Climate Change Adaptation & Mitigation – Final Report October 2020
- Climate Change Adaptation & Mitigation – Baseline Report October 2020
- Staffordshire Local Transport Plan 2011
- Staffordshire County Council Local Cycling and Walking Infrastructure Plan 2020 – 2030
- Cycling and Walking Network – Transport for West Midlands 2019
- Starley Network – West Midlands Network
- Movement for Growth – 2026 Delivery Plan for Transport – Transport for West Midlands
- 2040 Plan for Metro and Rail in the West Midlands – West Midlands Mayor
- Cycle infrastructure Design: Local Transport Note 1/20 – Department for Transport 2020

The Natural and Built Environment

Protecting and enhancing the natural environment		
Policy Reference	Proposed Direction of Travel	Relevant 2018 Issues and Options policy options
NB1 - Protecting, enhancing and expanding natural assets	<ul style="list-style-type: none"> Policy will promote the protection, enhancement and restoration of the natural environment. Proposals which could have an adverse impact on Internationally and Nationally designated habitats and protected and priority species (including habitats considered to be irreplaceable – ancient woodland, ancient/veteran trees, historic parkland) will be determined in accordance with the provisions of the relevant statutory and national policy. Support will be given to any proposals to enhance designated sites. Locally designated habitats, including local wildlife sites, will be protected and enhanced. Opportunities to improve connectivity and to facilitate the creation of wildlife corridors will be supported. Protect and enhance areas of high habitat distinctiveness and support the creation of strategic linkages and stepping stones, using the most up-to-date Nature Recovery Network mapping prepared by the Staffordshire Wildlife Trust. Require developments to enhance the natural as well as the built environment, including through a requirement for tree lined streets, 	<ul style="list-style-type: none"> Natural Environment Policy Option B
NB2 - Biodiversity	<ul style="list-style-type: none"> Policy will employ use of the mitigation hierarchy (Avoid, Mitigate, Compensate) when considering the potential impacts of development on biodiversity. Details of proposed mitigation/compensation will need to be agreed prior to gaining approval. Where relevant applicants will be required to undertake an Ecological Survey/Ecological Impact Assessment. <p>All new development will contribute a measurable net biodiversity gain:</p> <ul style="list-style-type: none"> A threshold of 10% will be set for major developments. Applicants will be expected to submit a Biodiversity Baseline Assessment of the current site. Calculation to be based on Defra's biodiversity metric. Net-gain is to be delivered on-site wherever possible. If this cannot be achieved and where the ecological benefits are greater through enhanced off-site provision then a financial contribution will be sought and directed to off-site projects informed by the most up-to-date Nature 	<ul style="list-style-type: none"> Natural Environment Policy Option B

	Recovery Network mapping prepared by the Staffordshire Wildlife Trust.	
NB3 - Cannock Chase SAC	<p>The Principal legislative framework surrounding SAC's remains unaltered. The principle of requiring mitigation to address the likely adverse effects of residential development remains valid. The policy will however require updating to take account of emerging changes being promoted by the SAC partnership i.e.</p> <ul style="list-style-type: none"> • The range of development captured by the scheme may be extended to encompass other forms of accommodation including tourism facilities, HMO's, Assisted Living, Sheltered housing etc. • Reference to suitability of Sites of Alternative Natural Green Space (SANGs) as a possible mitigation measure is still to be resolved, the recent SAC Planning Evidence Base update suggested that this be the subject of a separate scoping study. • Update the separate Guidance to Mitigation note or produce a dedicated SPD. This will need to be cross referenced by the Local Plan Policy and will contain details of the necessary mitigation including the charging regime and its extent both geographically and in terms of accommodation types (different types may attract differential charging). • Include a policy hook to address potential issue with air quality on Cannock Chase SAC and other SAC sites and the potential need for mitigation to address this issue. 	<ul style="list-style-type: none"> • Question 75 in the 2018 Issues and Options consultation
NB4 - Landscape Character	Policy will maintain the current approach used in Core Strategy Policy EQ4 seeking to protect and enhance landscapes including a commitment to undertake landscape sensitivity and capacity assessment to seek to focus growth in areas of lesser sensitivity. A potential amendment would be the strengthening of the protection for on-site trees and hedgerows.	<ul style="list-style-type: none"> • Landscape Character Policy Option A

6.25 South Staffordshire is host to a wide variety of assets that contribute to the District's natural environment, ranging from designated Special Areas of Conservation to the hedgerows and trees that contribute to the biodiversity and rural character of the District. The policy approaches proposed by the Council seek to offer protection to all of these natural assets, in a manner proportionate to their importance. Recognising more recent changes to national policy, the policies now offer greater protection to irreplaceable natural assets and recognise the role of highly distinctive habitats and strategic linkages identified in the District's Nature Recovery Network Mapping, putting in place proportionate protections for these areas.

6.26 Recognising the increasing importance of biodiversity net gain in national planning policy, the policy approaches also seek to introduce a new mechanism to secure biodiversity net gain within the District, using a clear metric, mitigation hierarchy and evidence base to

identify potential off-site improvement options. The District's Nature Recovery Network Mapping offers guidance on how any habitat mitigation or compensation could be appropriately directed across the District, ensuring that any habitats provided are in the right location and of the right type to genuinely improve biodiversity. Taken together with the other protective policy approaches, this will help to ensure that new development proposals improve, rather than detract from, the District's natural environment.

- 6.27 In addition to more general policies seeking to manage the District's wider natural environment, the Council's specific policy approach to the Cannock Chase Special Area of Conservation (SAC) has been restated and amended to reflect the most up-to-date evidence regarding this important habitat. The updates made recognise the existing and emerging work that the Council participates in with Natural England and other Council's through the Cannock Chase SAC Partnership, ensuring that this SAC is not adversely affected by planned development.
- 6.28 The District's natural environment has value not only in terms of its biodiversity and habitats, but also in terms of its contribution to the rural character of the District. The existing landscape character policy in the Council's Core Strategy is to be retained, but also updated to include an increased emphasis on the Council's landscape sensitivity evidence base and the importance of tree and hedgerow retention within the District. This approach recognises the presence of valuable landscapes within the District as well as the intrinsic character and beauty of South Staffordshire's rural area, ensuring that new development responds positively to these assets.

Key evidence

- Nature Recovery Network Mapping 2020
- Cannock Chase Special Area of Conservation Evidence Base Review Stage 2
- Landscape Sensitivity Study 2019
- Planning for Landscape Change - Staffordshire County Council

Climate Change and sustainable development		
Policy Reference	Proposed Direction of Travel	Relevant 2018 Issues and Options policy options
NB5 - Renewable and low carbon energy generation	<ul style="list-style-type: none"> Indicate general in-principle support across the District for renewable or sustainable energy schemes, such as solar and wind generation, subject to conformity with other local plan policies (particularly those relating to the natural and historic environment, amenity and landscape character) Clarify that the Council may still consider biomass schemes where fully compliant with both the existing adopted Core Strategy Policy EQ6 criteria and additional criteria regarding sustainable biomass fuel sources and impacts on air quality Indicate general support for on-shore wind, removing the areas of search set out in the adopted Core Strategy Policy EQ6, instead adopting a District-wide criteria-based policy which also reflects national policy requirements on community engagement Confirm that renewable energy development in the Green Belt may be justified, where very special circumstances can be demonstrated for any elements which would be inappropriate Green Belt development 	<ul style="list-style-type: none"> Adapting to a Changing Environment Policy Option D
NB6 - Energy and water efficiency, energy and heat hierarchies and renewable energy in new development	<p>All major residential developments must:</p> <ul style="list-style-type: none"> achieve a 31% carbon reduction improvement upon the requirements within Building Regulations Approved Document Part L 2013, or conform with any national targets which subsequently exceed this standard exceed the carbon emission targets set by current UK Building Regulations through fabric and energy efficiency measures alone, whilst achieving the additional 31% CO2 improvement target through further fabric and energy efficiency and/or the use of decentralised, low and zero carbon energy technologies submit an energy statement identifying the predicted energy consumption and associated CO2 emissions of the development and demonstrating how the energy hierarchy has been applied to make the fullest practicable reduction in regulated carbon emissions arising from the development 	<ul style="list-style-type: none"> Adapting to a Changing Environment Policy Option B Question 77 in the 2018 Issues and Options consultation

	<ul style="list-style-type: none"> • deliver the optional water efficiency standards for new developments set out in the Planning Practice Guidance <p>All major non-residential development must:</p> <ul style="list-style-type: none"> • achieve BREEAM ‘Excellent or Outstanding’ standard • submit an energy statement demonstrating how the energy hierarchy has been applied to make the fullest practicable reduction in regulated carbon emissions arising from the development 	
NB7 - Managing flood risk, sustainable drainage systems & water quality	<p>The following will be key requirements of any future policy:</p> <ul style="list-style-type: none"> • All major developments should deliver sustainable drainage systems and provide a site specific flood risk assessment and surface water drainage strategy, which should include details of adoption, ongoing maintenance and management • Site-specific flood risk assessments should be in accordance with any relevant national requirements and take account of the latest climate change allowances • Sustainable drainage systems should reflect the design requirements and drainage hierarchy set out in the Staffordshire County Council Sustainable Drainage Systems (SuDS) Handbook - February 2017, or subsequent updates • Development should not adversely affect the quality or quantity of water, either directly through pollution of surface or ground water or indirectly through the treatments of waste water 	<ul style="list-style-type: none"> • n/a (informed by joint working with key infrastructure providers)
NB8 - Hazardous and environmentally sensitive development	Retain current approach set out in the adopted Core Strategy (Policy EQ10).	<ul style="list-style-type: none"> • n/a

6.29 The District has recently declared a climate emergency, recognising the importance of the Council’s functions in contributing to a radical reduction in carbon emissions. To help the Council to identify opportunities to achieve this aim it has jointly prepared a climate change evidence base with other Staffordshire authorities. It is proposed to take forward a number of recommendations from this study.

6.30 To assist in climate change mitigation, the policy approaches include enhanced energy efficiency standards and encourage the use of energy hierarchies and on-site renewable energy provision, recognising the need to reduce carbon emissions in the District’s built environment and the difficulties and additional costs of retrofitting the necessary technology at a later date. It also addresses the need to decarbonise energy generation within the District, introducing an in-principle support for most types of renewable energy generation

within the District, where these can be sensitively accommodated. It also reflects the climate change evidence base's recommendations regarding onshore wind and biomass, proposing appropriate updates to the Council's existing policies to reflect more recent evidence and changes in national planning policy on such schemes.

- 6.31 The District's areas of flood risk, existing drainage infrastructure and water resources need to be managed effectively to adapt to the effects of climate change and to ensure new development is supported by appropriate infrastructure. Policy approaches have been drafted to address these issues, reflecting previous engagement with the Lead Local Flood Authority (Staffordshire County Council) and Severn Trent Water. This had led to key design requirements that should be used by new development, such as delivering on-site sustainable drainage systems designed and delivered in accordance with the Lead Local Flood Authority's SuDS handbook and ensuring new dwellings are designed to be water efficient to reduce the burden on the surrounding drainage infrastructure.
- 6.32 Recognising the ongoing importance of ensuring that potentially hazardous or polluting uses are kept separate from other sensitive uses, the Local Plan Review proposes to retain the existing policy approach to such developments, set out in the 2012 Core Strategy.

Key evidence

- Southern Staffordshire Councils Level 1 Strategic Flood Risk Assessment - Final Report October 2019
- Staffordshire County Council Sustainable Drainage Systems (SuDS) Handbook - February 2017
- Staffordshire Climate Change Adaptation & Mitigation – Final Report October 2020
- Staffordshire Climate Change Adaptation & Mitigation – Baseline Report October 2020
- Southern Staffordshire Councils Water Cycle Study – Phase 1 Scoping Study February 2020

Enhancing the Historic Environment		
Policy Reference	Proposed Direction of Travel	Relevant 2018 Issues and Options policy options
NB9 - Conservation, preservation and protection of historic assets	<ul style="list-style-type: none"> • Policy to promote the conservation and enhancement of the historic environment through the positive management of development proposals and the safeguarding of heritage assets and their setting. • Development affecting heritage assets and their setting to be determined in accordance the approach detailed in the NPPF. Applicants to be required to submit a proportionate assessment of the impact of proposed development on the significance of any identified heritage assets. • New development to take account of existing historical character when considering siting, design and use of materials. • Development to be sympathetic and consistent with the conservation and enhancement of heritage assets and their setting. • New development to take the opportunity to better reveal the significance and increase understanding of heritage assets. • Alternative uses for heritage assets, consistent with asset conservation, will be supported subject to consideration of the viability of the proposed new use. • Works to heritage assets to be informed by historical, architectural and archaeological evidence proportionate to significance. • Proposals for enabling development will be considered and assessed to determine if the benefits of securing the future conservation of the heritage asset outweigh the departure from adopted plan policies. • Maintain a local list of non-designated heritage assets. Proposals to conserve and enhance local list assets will be supported. • Proposals affecting Conservation Areas and their setting should take account of the appraisals and recommendations contained with the adopted Conservation Area Management Plan. Features to be considered include respecting focal buildings, important views and positive buildings and open spaces. 	<ul style="list-style-type: none"> • Historic Environment Policy Option A
NB10 - Canal network	<p>Proposals for new canal-side development to:</p> <ul style="list-style-type: none"> • Be sympathetic and consistent with the conservation and enhancement of the canal network. • Be located within or close to existing settlements in preference to isolated developments within the District's wider rural area. 	n/a

	<ul style="list-style-type: none"> • Support measures to integrate the canal network into the wider Green Infrastructure network through biodiversity net gain. • Maintain support for restoration of the Hatherton Branch Canal extension. 	
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- 6.33 South Staffordshire has a rich variety of historic assets spread throughout the District, of a variety of scales and importance. In the wider rural area these often include canal conservation areas which run for large distances through the District, as well as large designated and undesignated historic parks and gardens sat within a wider rural landscape. The villages within South Staffordshire also have a varied historic past, from the historic medieval market towns in Penkridge, Kinver and Brewood to the more recent settlements in the north-east of the District based upon the historic mining industry in that area. Numerous conservation areas are also spread throughout the District, often recognising the historic core of the District’s rural villages, whilst a variety of listed buildings are scattered throughout both the District’s villages and wider rural area.
- 6.34 To ensure appropriate mechanisms are in place to respond appropriately to this tapestry of heritage assets, the Local Plan Review will include a policy reflecting the approach set out the above. This builds on the District’s existing historic environment policies, whilst increasing the emphasis on the use of the Conservation Area Management Plans prepared throughout the District to ensure that new development in such areas is sympathetic to the surrounding historic character. It also clarifies that development proposals affecting the setting of a heritage asset will be determined using the relevant policy test in national planning policy, to offer clarity to applicants and decision makes.
- 6.35 Reflecting the recreational and historic importance of the District’s canal network, a policy approach has been set out above to sensitively manage development in such locations. This builds upon existing policies within the District’s Local Plan, but places an increased emphasis on the role of the canal network in contributing to biodiversity net gain, whilst also encouraging new canal-side development towards existing settlements within the District to increase the sustainability of such proposals.

Key evidence

- Conservation Area Management Plans
- Historic Environment Site Assessment
- Historic Environment Character Assessment
- Staffordshire Historic Environment Record
- Hatherton Canal Restoration Feasibility Report and Supplementary Feasibility Report

Question 11:

Do you agree with the proposed policy approaches set out in Chapter 6?

Yes/No

If no, then please provide details setting out what changes are needed, referencing the Policy Reference number (e.g HC1 - Housing Mix).

Question 12:

- a) It is proposed that the fully drafted policies in this document (Policies DS1-DS4 and SA1-SA7) are all strategic policies required by paragraph 21 of the NPPF. Do you agree these are strategic policies? Yes/No**
- b) Are there any other proposed policies in Chapter 6 that you consider should be identified as strategic policies? Yes/No**
If yes, then please provide details including the Policy Reference (e.g HC1 – Housing Mix)

7. Next Steps

- 7.1 Following the close of the Preferred Options consultation, all responses will be considered and summarised to inform the preparation of the Publication Plan which we will aim to consult on in summer 2022. The Publication Plan will be the final draft plan that we consult on before submitting the Local Plan for examination, and at that stage comments should relate to the ‘soundness’ of the plan.
- 7.2 Prior to the Publication stage, it will be considered if any amendments to our proposals are required following consideration of responses to this consultation. Further work will be undertaken with infrastructure providers on what infrastructure is necessary to support the proposed developments as well as a further assessment of the viability of the plans proposals. Of particular importance will be work with Staffordshire County Council Highways and Highways England to utilise highways modelling to consider the impact of proposed strategic developments on the network, and then working with site promoters to ascertain what mitigation measures will be necessary.
- 7.3 It will also be necessary to start to draft Statements of Common Ground with neighbouring authorities in order to formally agree contributions to unmet needs along with agreements to cover cross boundary infrastructure delivery. In addition, draft Statements of Common Ground with the promoters of preferred sites will need to be drafted following this consultation to confirm what the site is required to deliver, and that the site promoters are willing to deliver a policy compliant scheme.
- 7.4 To stay up to date with progress on the Local Plan please register with our online consultation system here: <https://sstaffs.oc2.uk/login>.

Appendix A

Evidence Base Studies

Evidence	Programming
Housing and Homelessness Strategy	Adopted 2018
Stoke on Trent and Staffordshire LEP Strategic Economic Plan (SEP)	Published April 2018
Economic Development Needs Assessment (Stage 1)	Published 2018
Habitats Regulation Assessment (HRA)	Initial HRA published 2018. Subsequent updates to the HRA published alongside each Local Plan consultation document
Infrastructure Delivery Plan (IDP)	Initial IDP published 2018. Subsequent updates to the IDP to be published alongside each Local Plan consultation document
Rural Services and Facilities Audit	Published 2018 and updated in 2019 and again in 2021
Sustainability Appraisal (SA) including Strategic Environmental Assessment (SEA)	Scoping Report and Initial SA published 2018. Subsequent updates to the SA published alongside each Local Plan consultation document
Black Country and South Staffordshire Green Belt Study and Landscape Sensitivity Study	Published 2019
South Staffordshire Nature Recovery Network Mapping	Published 2020
Staffordshire Climate Change and Adaptation and Mitigation Study	Published 2020
Historic Environment Site Assessment – Stage 1 report	Published 2020
Indoor Sports Needs Assessment and Strategy	Published 2020
Playing Pitch Needs Assessment and Strategy	Published 2020
Open Space Assessment and Standards Paper	Published 2020
Strategic Flood Risk Assessment 2019	Published 2020
Water Cycle Study 2020	Published 2021
West Midlands Strategic Rail Freight Interchange – Employment Issues Response Paper – Labour Supply	Published 2021
Gypsy and Traveller Accommodation Assessment 2021	Published 2021
Pitch Deliverability Study 2021	Published 2021
Retail Centres Study 2021	Published 2021
Local Plan Viability Study – part 1	Published 2021
Strategic Housing Market Assessment (SHMA) 2021	Published 2021

Specialist Housing: Local Need and Site Allocations Topic Paper 2021	Published 2021
Local Green Spaces Topic Paper 2021	Published 2021
Employment Sites: Site Assessment Topic Paper 2021	Published 2021
Housing Site Selection Topic Paper 2021	Published 2021
Duty to Cooperate Topic Paper	Published 2021
Cannock Chase Special Area of Conservation (SAC) Evidence Base Studies (including review of mitigation measures and visitor survey)	2022
Historic Environment Site Assessment- Stage 2 report	2022
Transport Impacts (with Staffordshire County Council)	2022
Local Plan Viability Study – part 2	2022

Appendix B

Strategic masterplanning location proformas

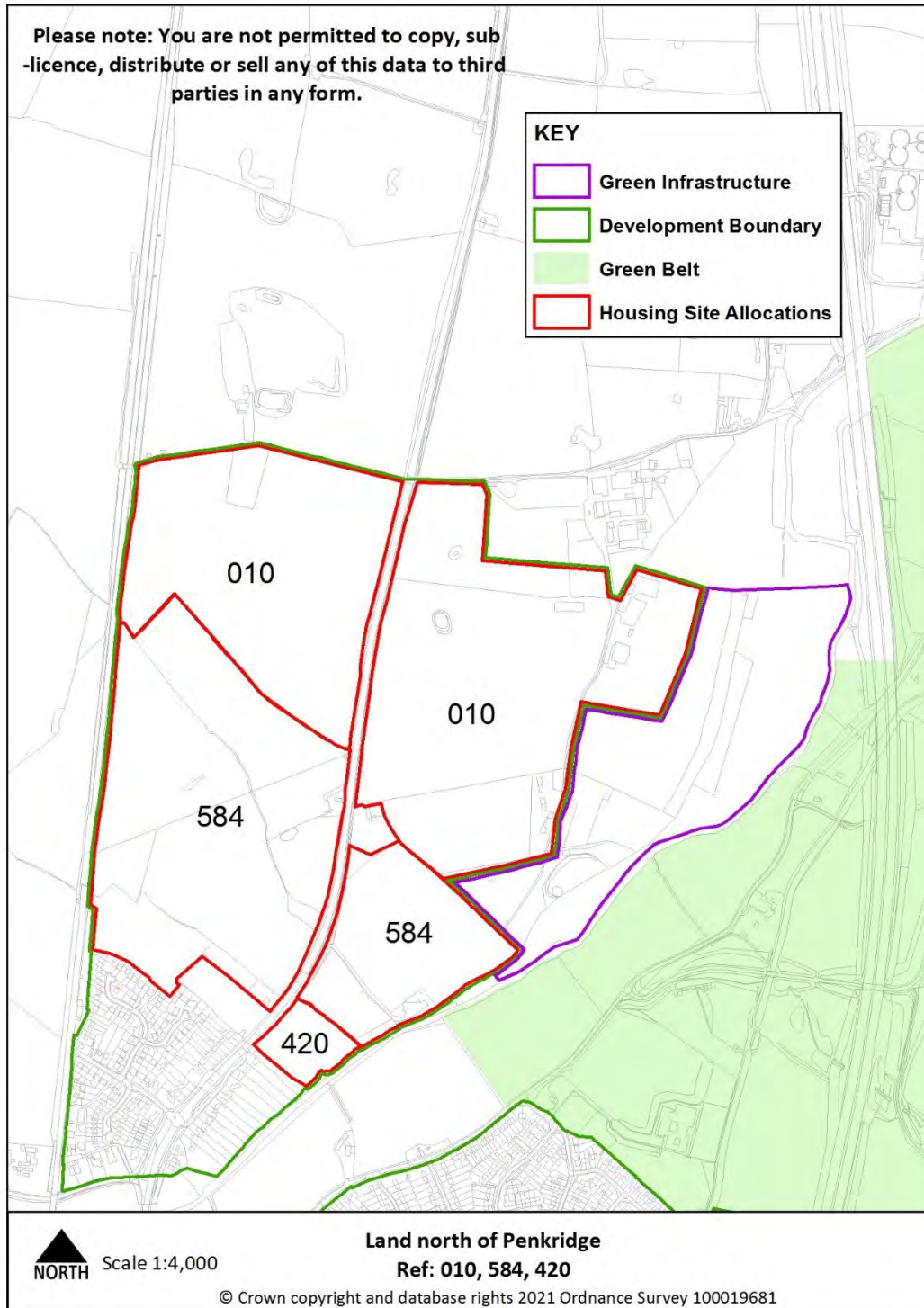
Site reference	519	Village	Bilbrook
Minimum capacity	848 dwellings	Address	Land east of Bilbrook
Site area	39.6 ha	Proposed use	Housing-led mixed use
<p>KEY</p> <ul style="list-style-type: none"> Green Infrastructure Development Boundary Green Belt Housing Site Allocations <p>Please note: You are not permitted to copy, sub-licence, distribute or sell any of this data to third parties in any form.</p> <p>519</p> <p>Land east of Bilbrook Ref: 519</p> <p>Scale 1:3,000</p> <p>© Crown copyright and database rights 2021 Ordnance Survey 100019681</p>			
Site infrastructure and access requirements	To deliver site in accordance with site specific requirements, Supplementary Planning Document and masterplanning process set out in Policy SA1.		

Site reference	486c	Location	North of the Black Country
Minimum capacity	1976 dwellings (1200 dwellings by 2038)	Address	Land at Linthouse Lane (Essington Ward - adjoining City of Wolverhampton Boundary)
Site area	94.1ha	Proposed use	Housing-led mixed use



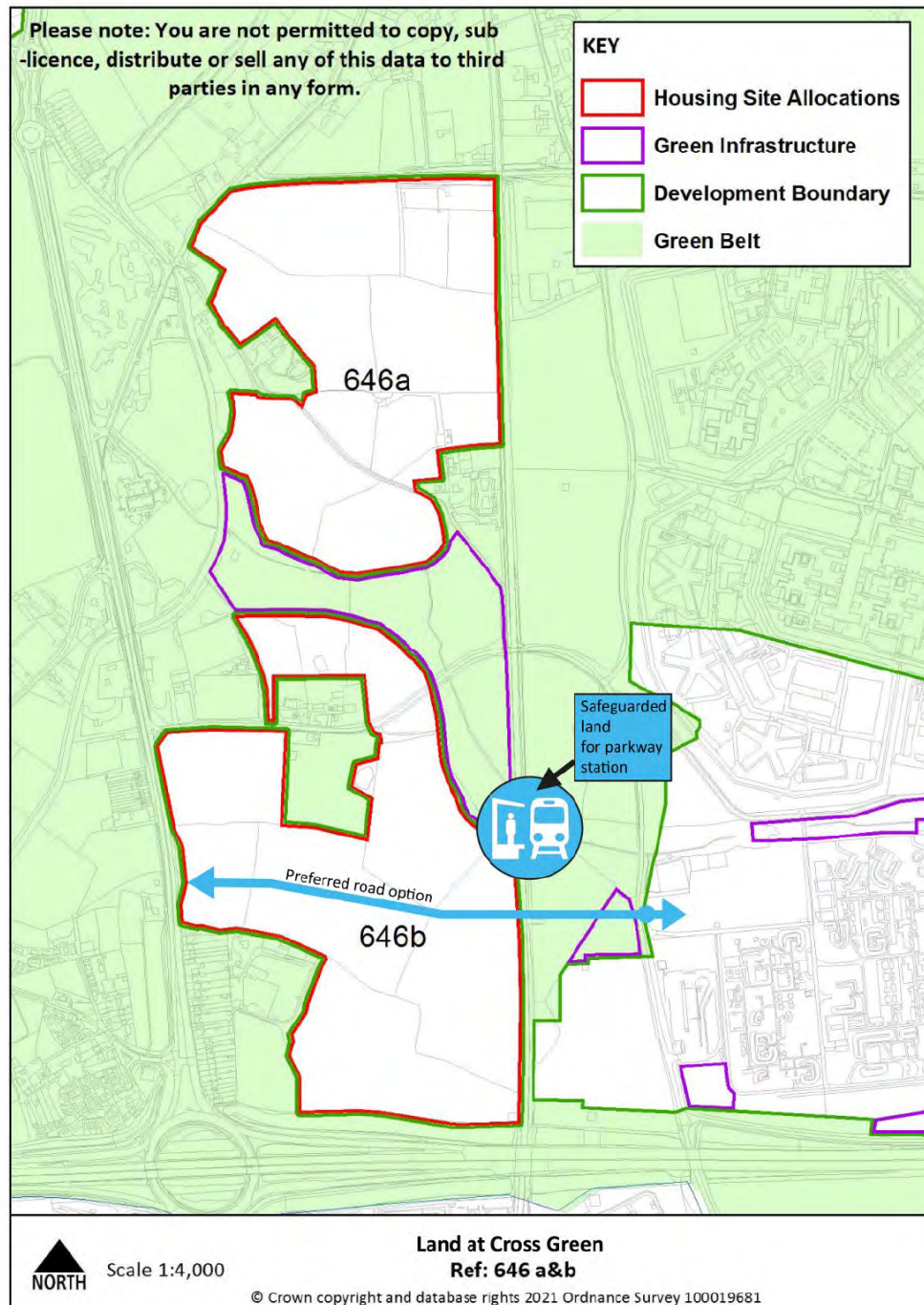
Site infrastructure and access requirements	To deliver site in accordance with site specific requirements, Supplementary Planning Document and masterplanning process set out in Policy SA3.
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Site reference	420, 584 & 010	Village	Penkridge
Minimum capacity	1129 dwellings	Address	Land north of Penkridge off A449 and Lower Drayton Farm
Site area	65.7 ha	Proposed use	Housing-led mixed use



Site infrastructure and access requirements	To deliver site in accordance with site specific requirements, Supplementary Planning Document and masterplanning process set out in Policy SA4.
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Site reference	646a&b	Location	North of the Black Country
Minimum capacity	1200 dwellings	Address	Land at Cross Green (Brewwood and Coven Ward)
Site area	54.3 ha	Proposed use	Housing-led mixed use

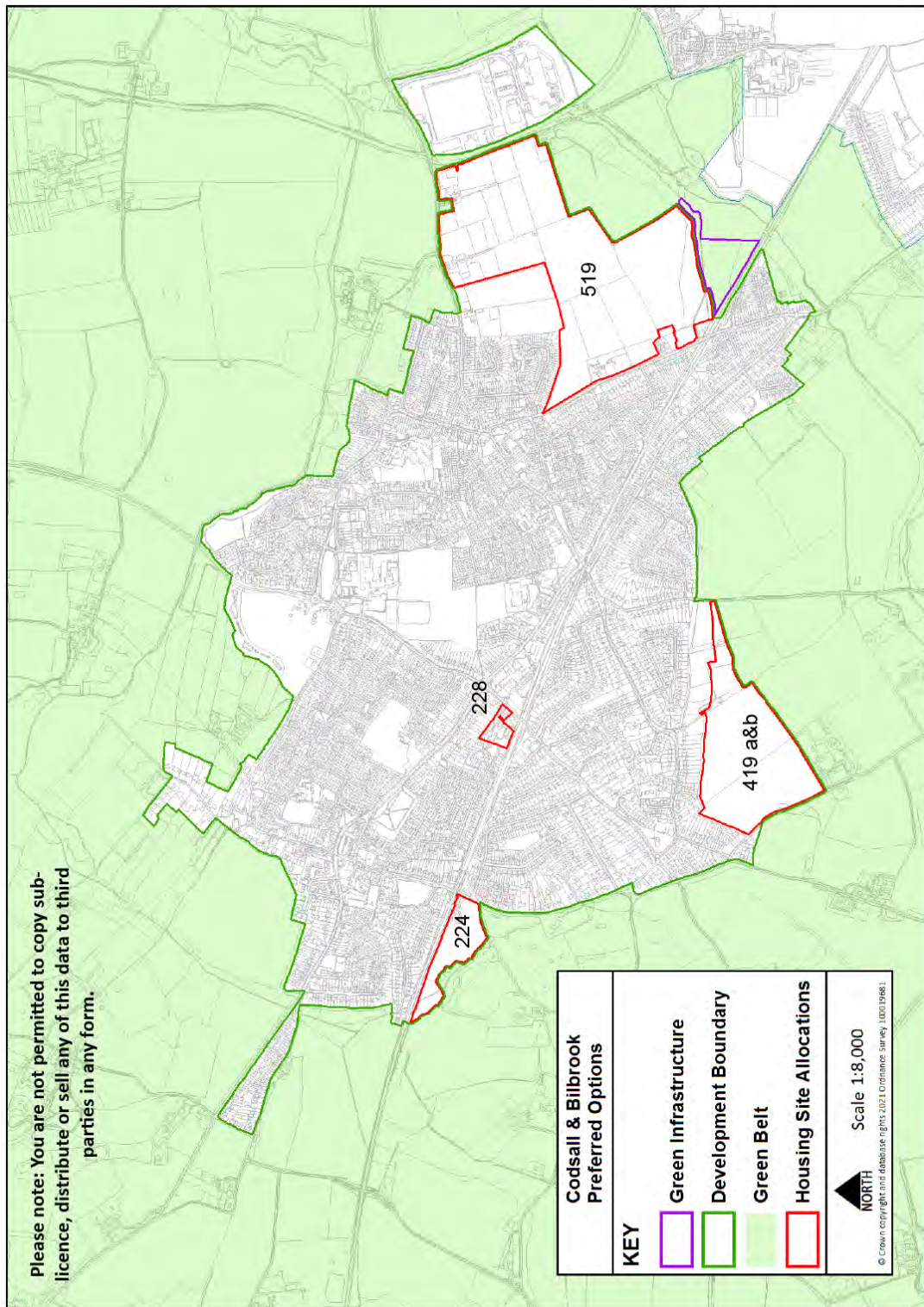


Site infrastructure and access requirements	To deliver site in accordance with site specific requirements, Supplementary Planning Document and masterplanning process set out in Policy SA2.
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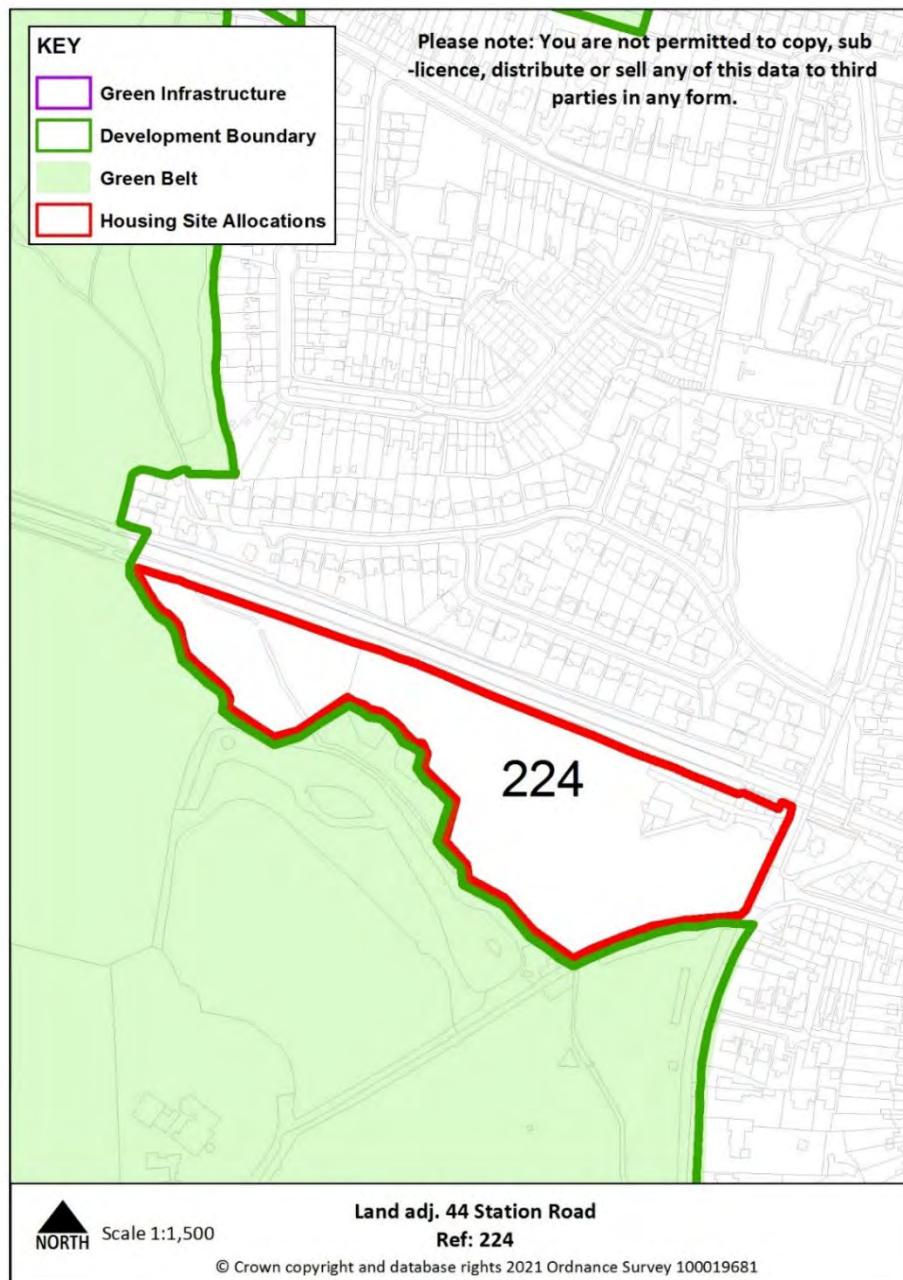
Appendix C

Housing allocation maps and proformas

Tier 1 Bilbrook & Codsall

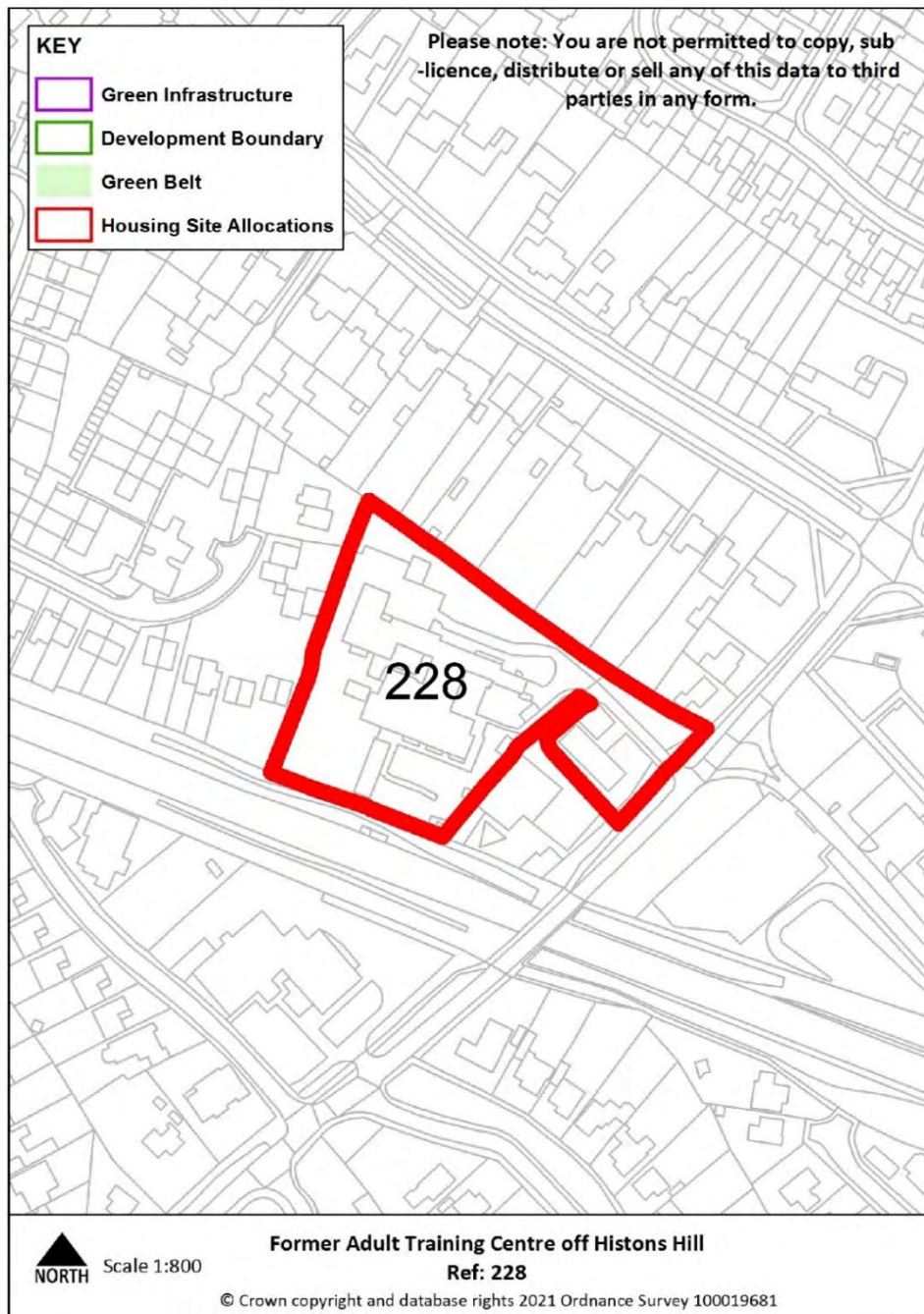


Site reference	224	Village	Codsall
Minimum capacity	85 dwellings	Address	Land adjacent to Station Road
Site area	4.0 ha	Proposed use	Housing



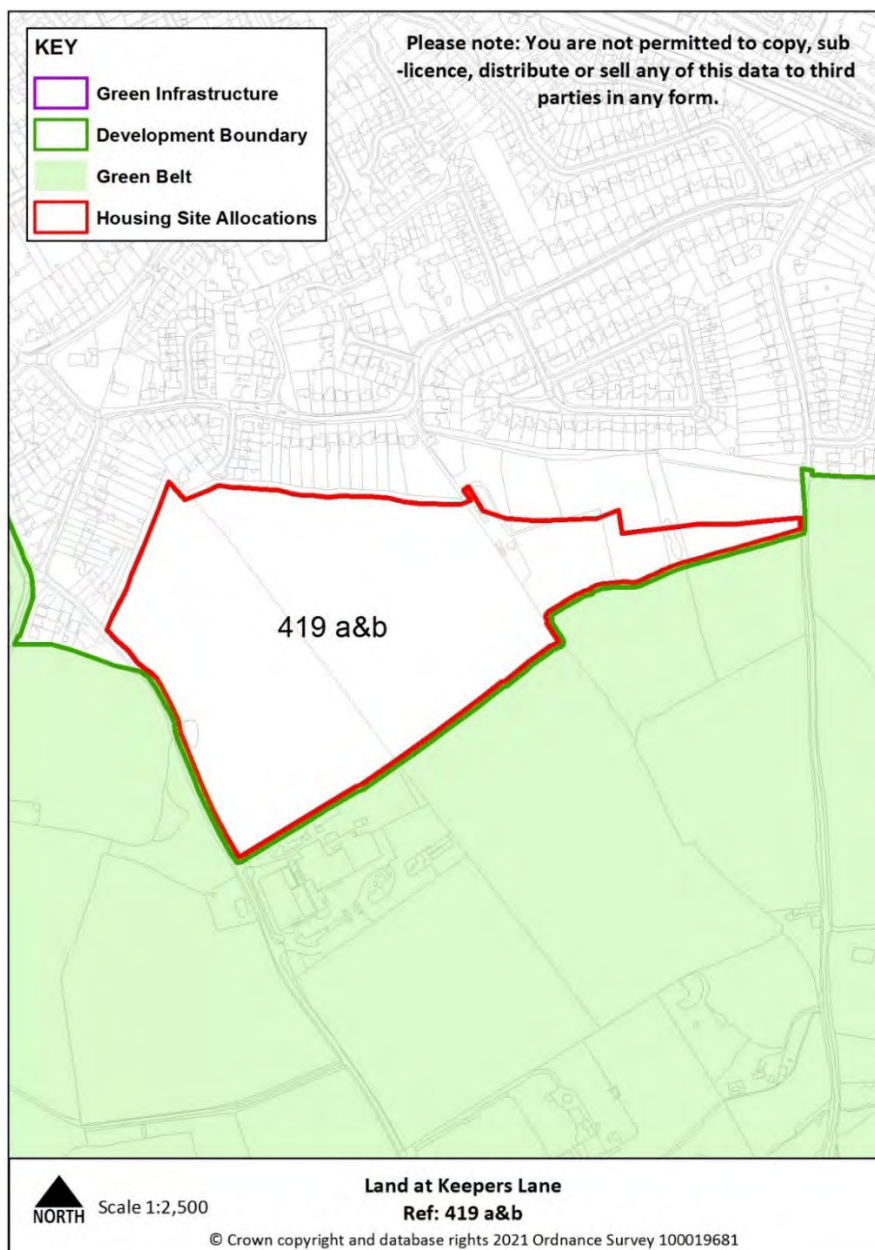
Key infrastructure requirements	<ul style="list-style-type: none"> To deliver a 30 space car park for Codsall railway station Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.
Proposed access	Provide vehicular and pedestrian access via Station Road

Site reference	228	Village	Codsall
Minimum capacity	29 dwellings	Address	Former Adult Training Centre off Histons Hill
Site area	0.8 ha	Proposed use	Housing



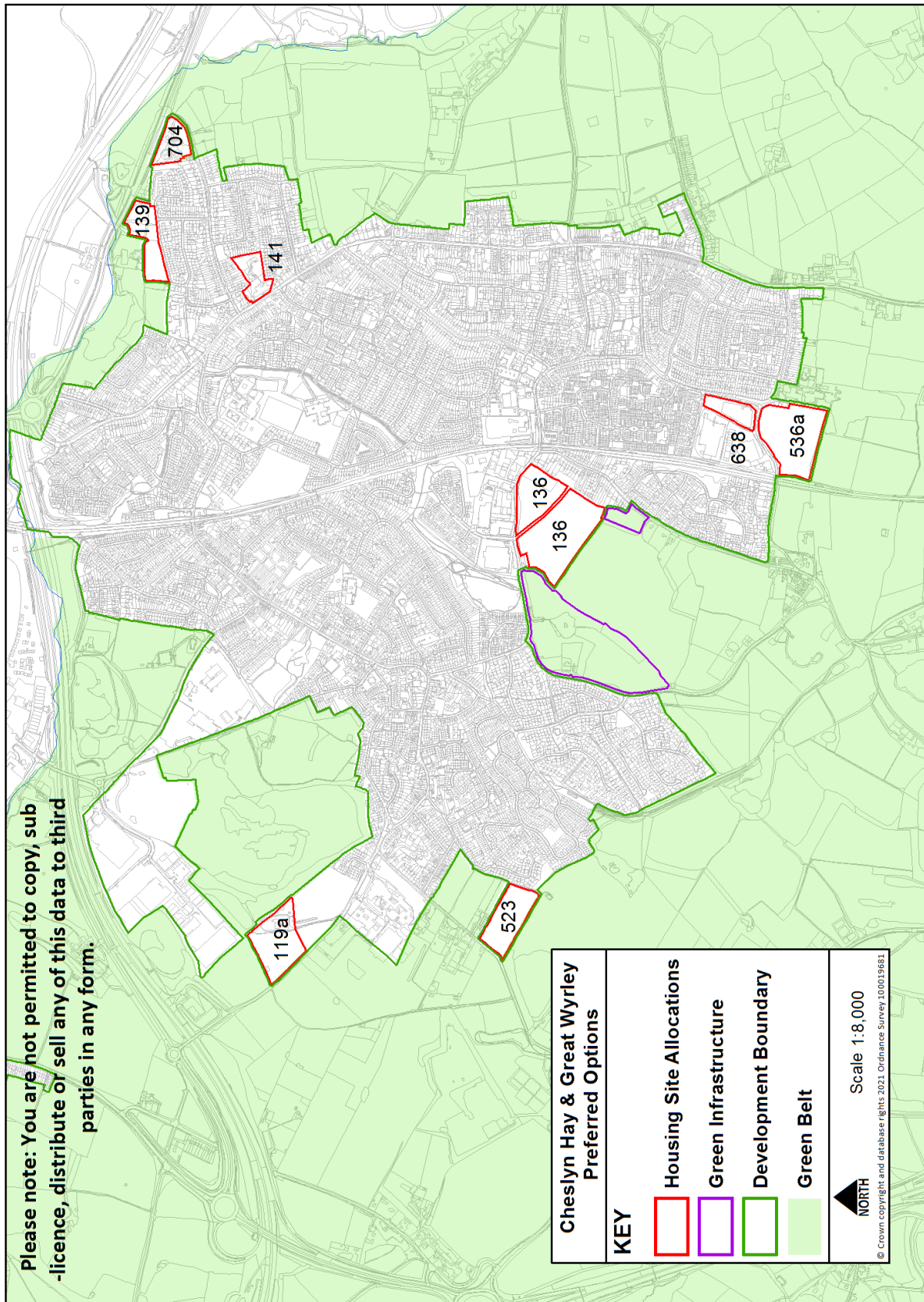
Key infrastructure requirements	Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.
Proposed access	Provide vehicular and pedestrian access via Histons Hill.

Site reference	419 a&b	Village	Codsall
Minimum capacity	317 dwellings	Address	Land at Keepers Lane & Wergs Hall Rd
Site area	15.1 ha	Proposed use	Housing

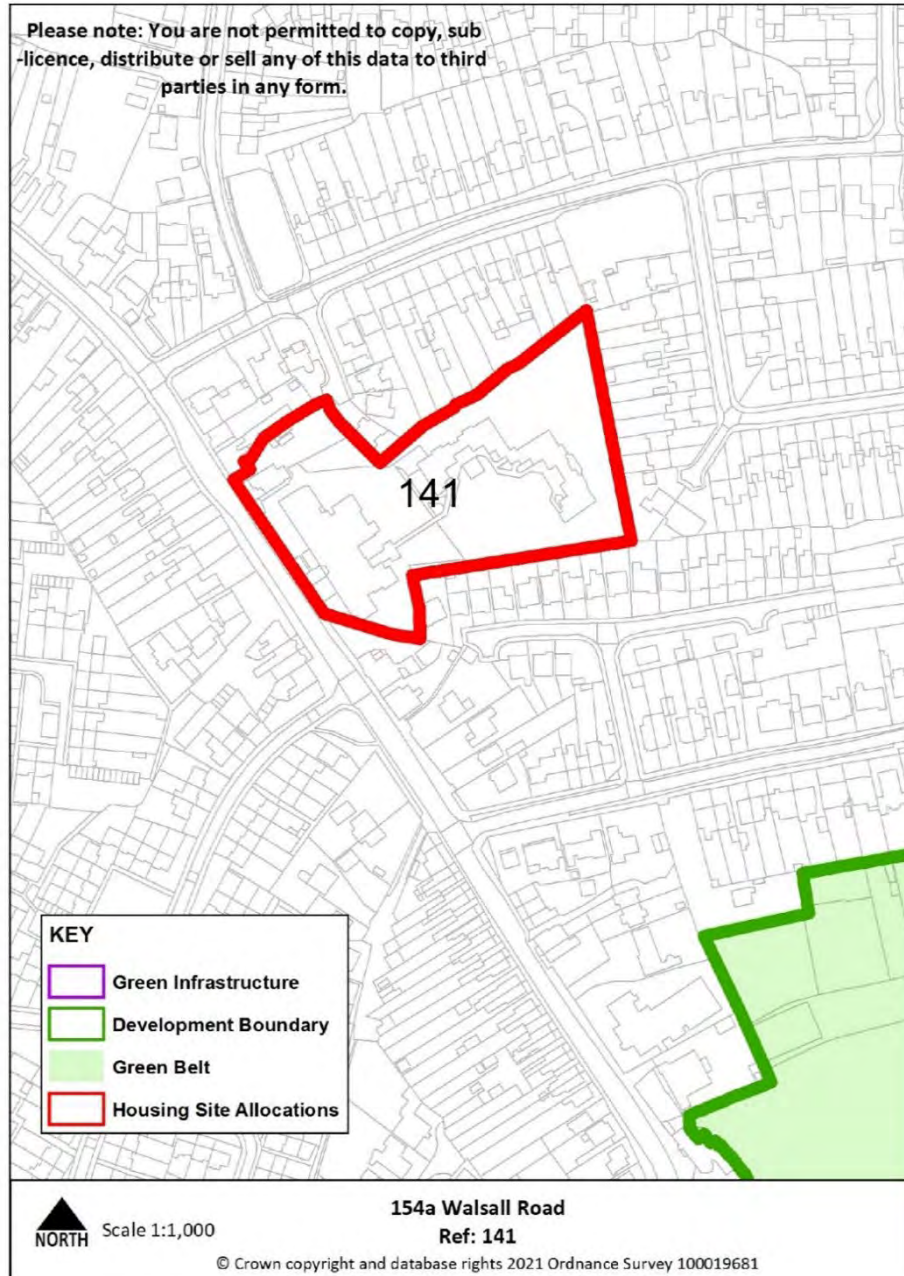


Key infrastructure requirements	Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.
Proposed access	Provide vehicular and pedestrian access via Wergs Hall Road and into the adjacent allocated housing site, including provision of a through road from Keepers Lane to Wergs Hall Road and extension of existing footway.

Cheslyn Hay & Great Wyrley

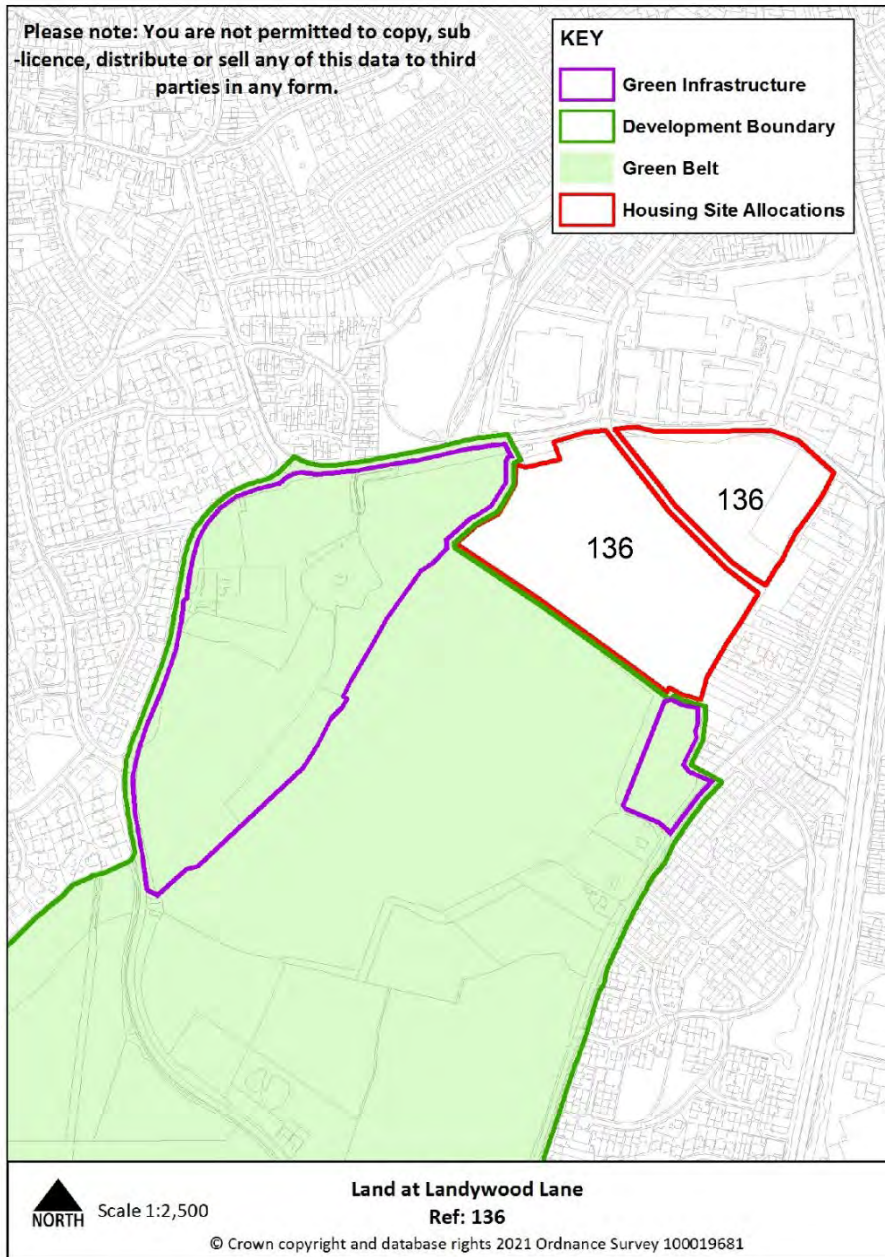


Site reference	141	Village	Great Wyrley
Minimum capacity	31 dwellings	Address	154a Walsall Road
Site area	1.2 ha	Proposed use	Housing



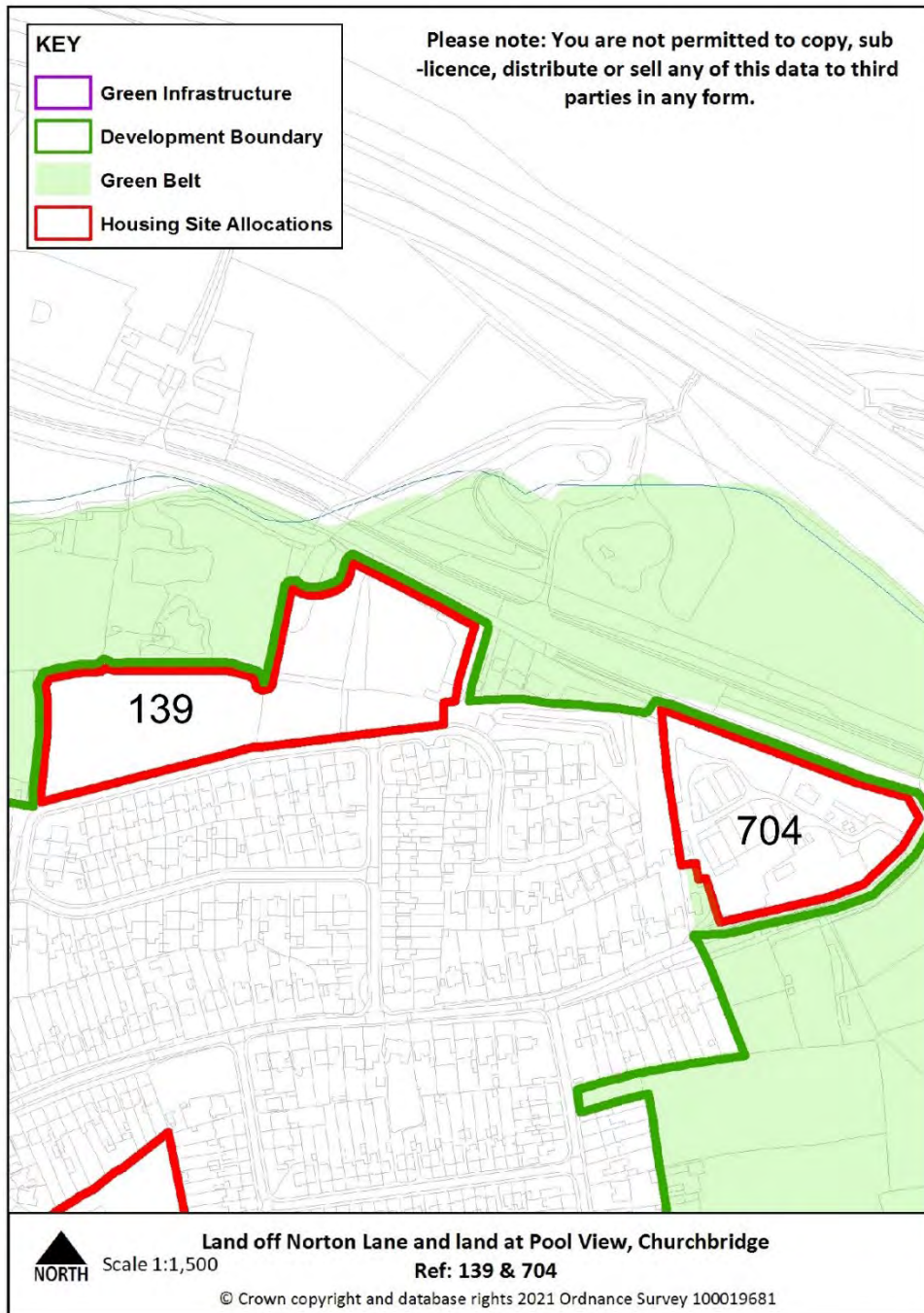
Key infrastructure requirements	Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.
Proposed access	Provide vehicular and pedestrian access via Walsall Road.

Site reference	136	Village	Great Wyrley
Minimum capacity	155 dwellings	Address	Land at Landywood Lane
Site area	7.4ha	Proposed use	Housing



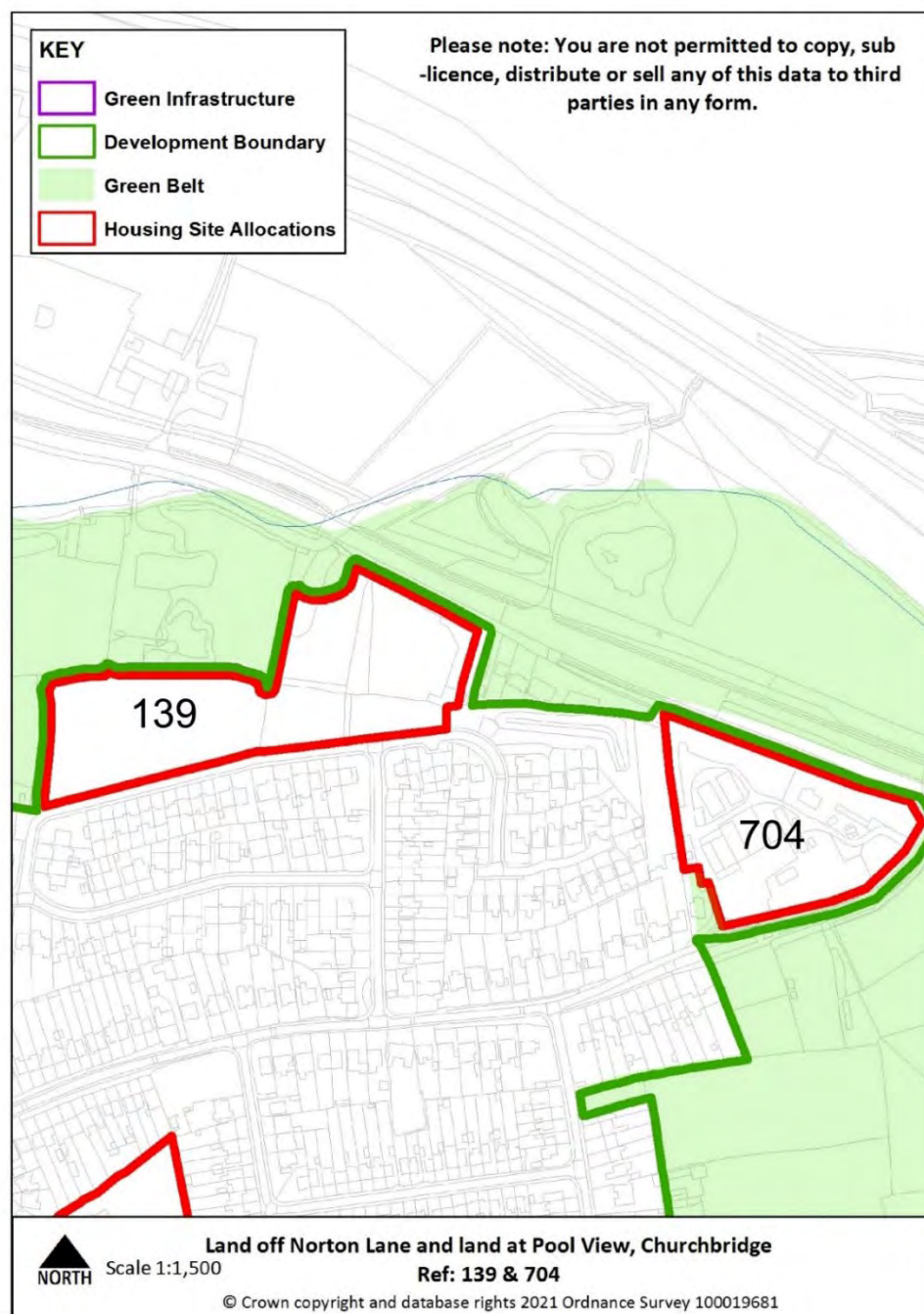
Key infrastructure requirements	<ul style="list-style-type: none"> To deliver a country park and to deliver land for allotments To deliver parking for Landywood Station Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.
Proposed access	Provide vehicular and pedestrian access via Landywood Lane and Upper Landywood Lane, alongside pedestrian access into new country park.

Site reference	139	Village	Great Wyrley
Minimum capacity	46 dwellings	Address	Pool View, Churchbridge
Site area	2.2 ha	Proposed use	Housing



Key infrastructure requirements	Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.
Proposed access	Provide vehicular and pedestrian access via Pool View.

Site Reference	704	Village	Great Wyrley
Minimum capacity	31	Address	Land off Norton Lane
Site area	1.3 ha	Proposed Use	Housing



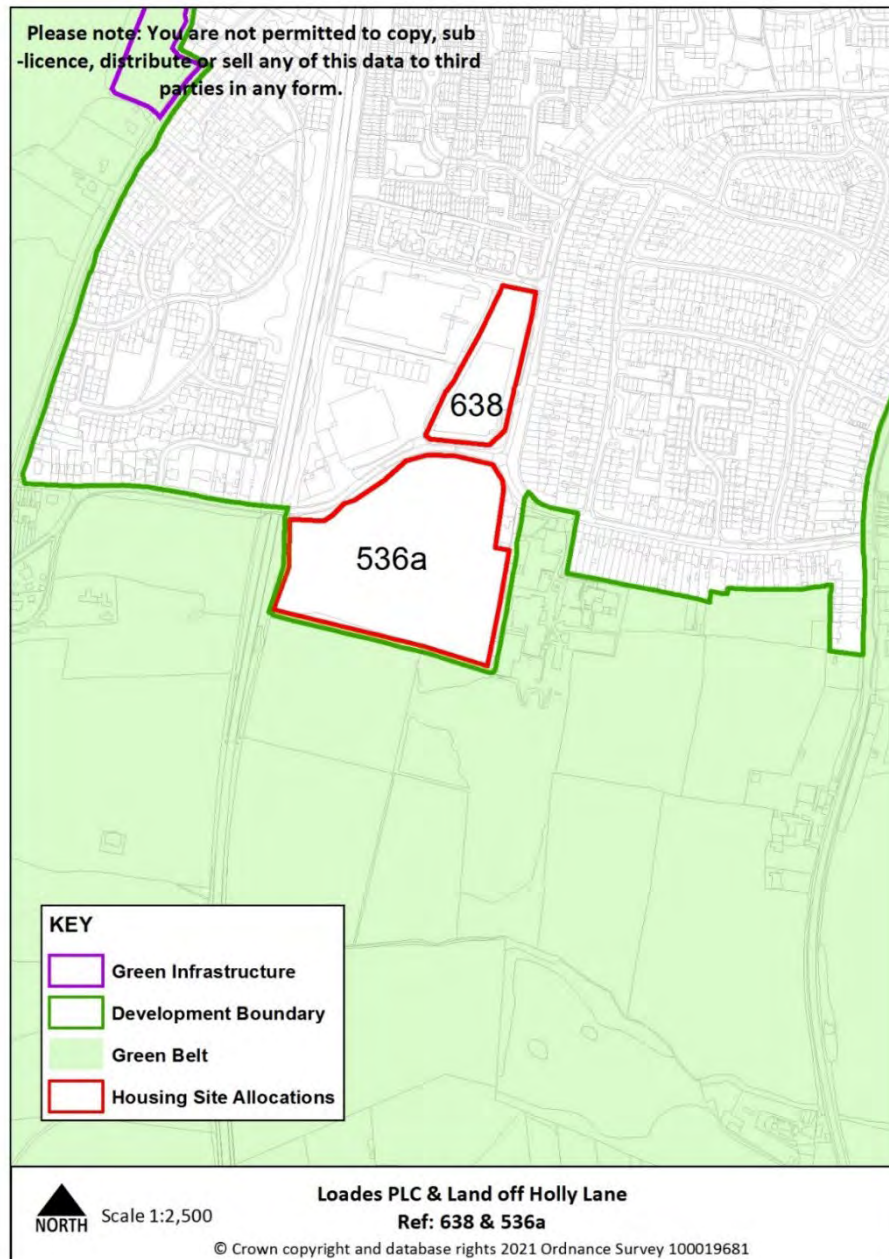
Key infrastructure requirements	Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.
Proposed access	Provide vehicular and pedestrian access via Norton Lane, including pedestrian crossing.

Site Reference	523	Village	Cheslyn Hay
Minimum capacity	49	Address	Land east of Wolverhampton Road
Site area	2.4 ha	Proposed Use	Housing



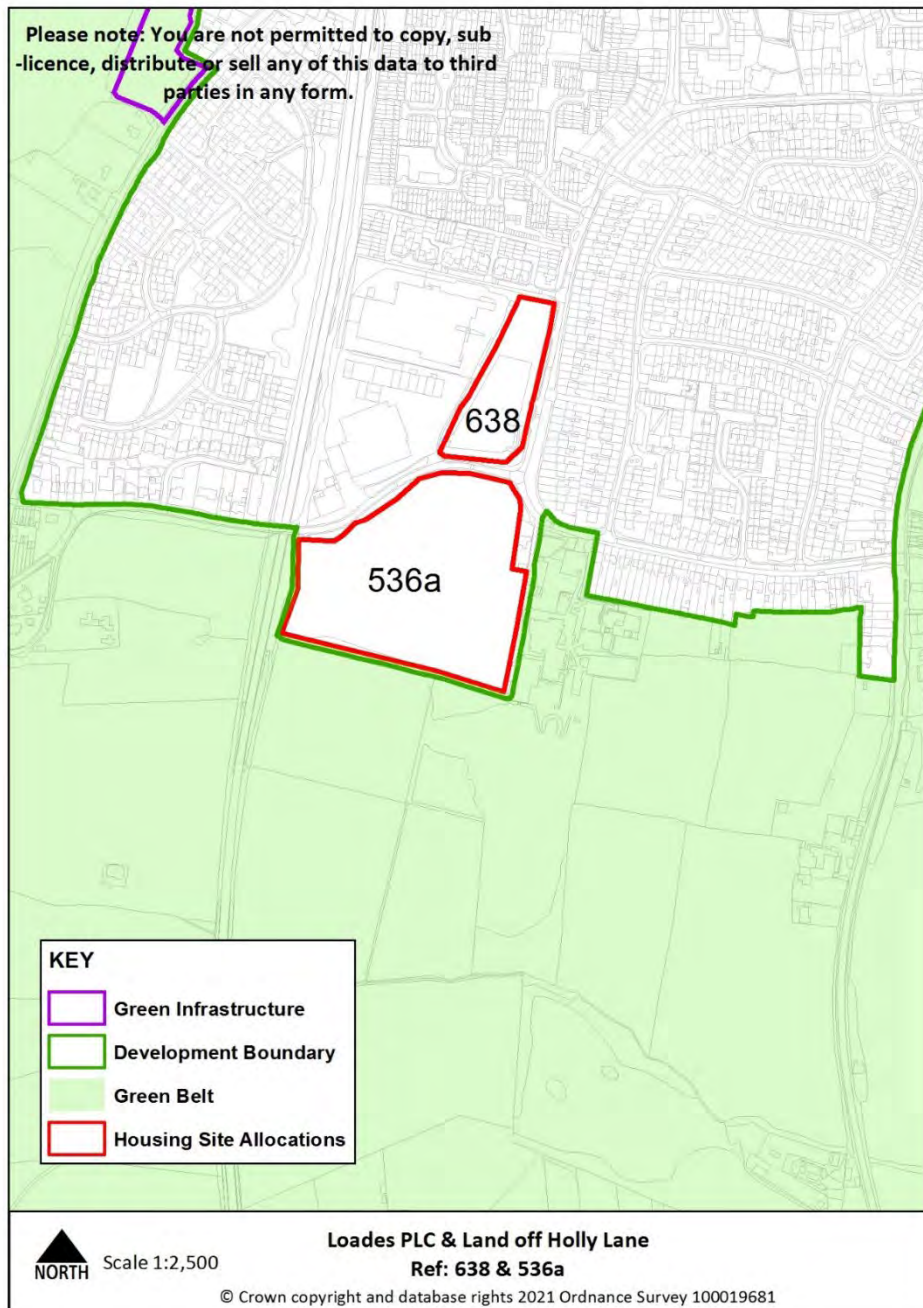
Key infrastructure requirements	<ul style="list-style-type: none"> Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.
Proposed access	Provide vehicular and pedestrian access via Wolverhampton Road and explore pedestrian access to Pinfold Lane

Site Reference	536a	Village	Cheslyn Hay
Minimum capacity	84	Address	Land off Holly Lane
Site area	4 ha	Proposed Use	Housing



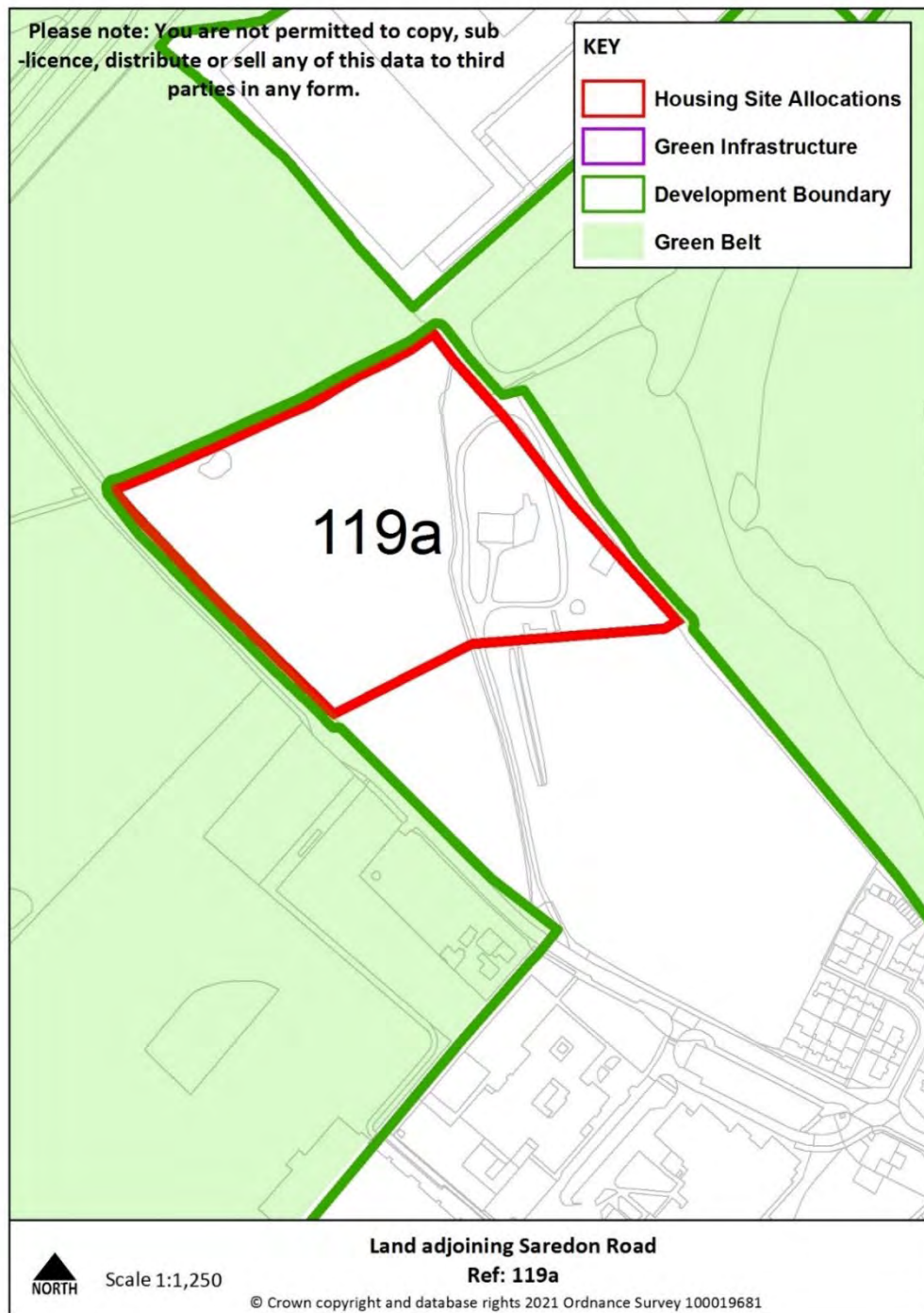
Key infrastructure requirements	<ul style="list-style-type: none"> • Deliver on site drop off parking to serve Landywood Primary School • Deliver on site specialist older persons housing • Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.
Proposed access	Provide vehicular and pedestrian access via Holly Lane.

Site reference	638	Village	Great Wyrley
Minimum capacity	29	Address	Loades PLC
Site area	1.1 ha	Proposed use	Housing



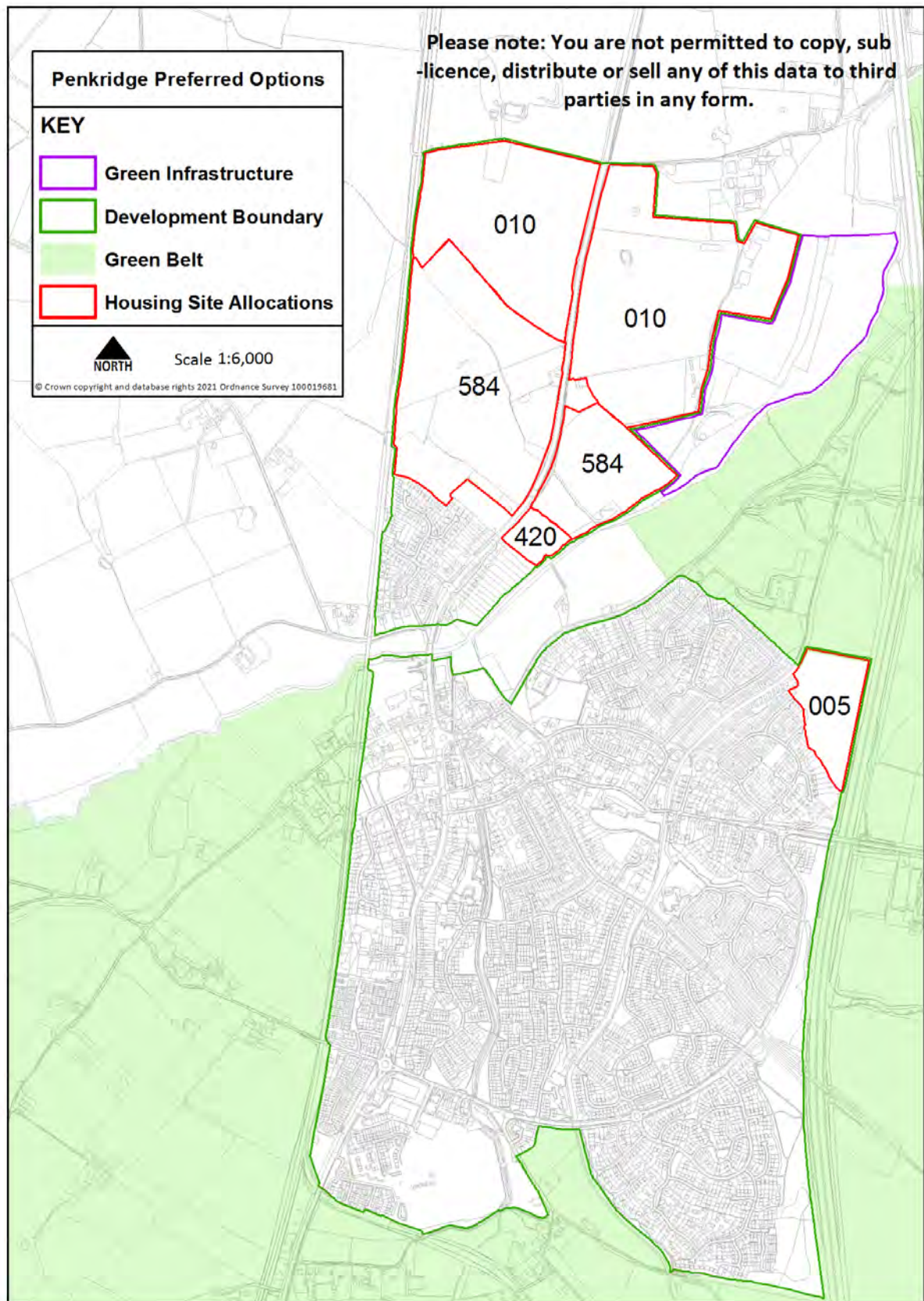
Key infrastructure requirements	Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.
Proposed access	Provide vehicular and pedestrian access via Loades PLC.

Site reference	119a	Village	Cheslyn Hay
Minimum capacity	60	Address	Land adjoining Saredon Road
Site area	2.9 ha	Proposed use	Housing

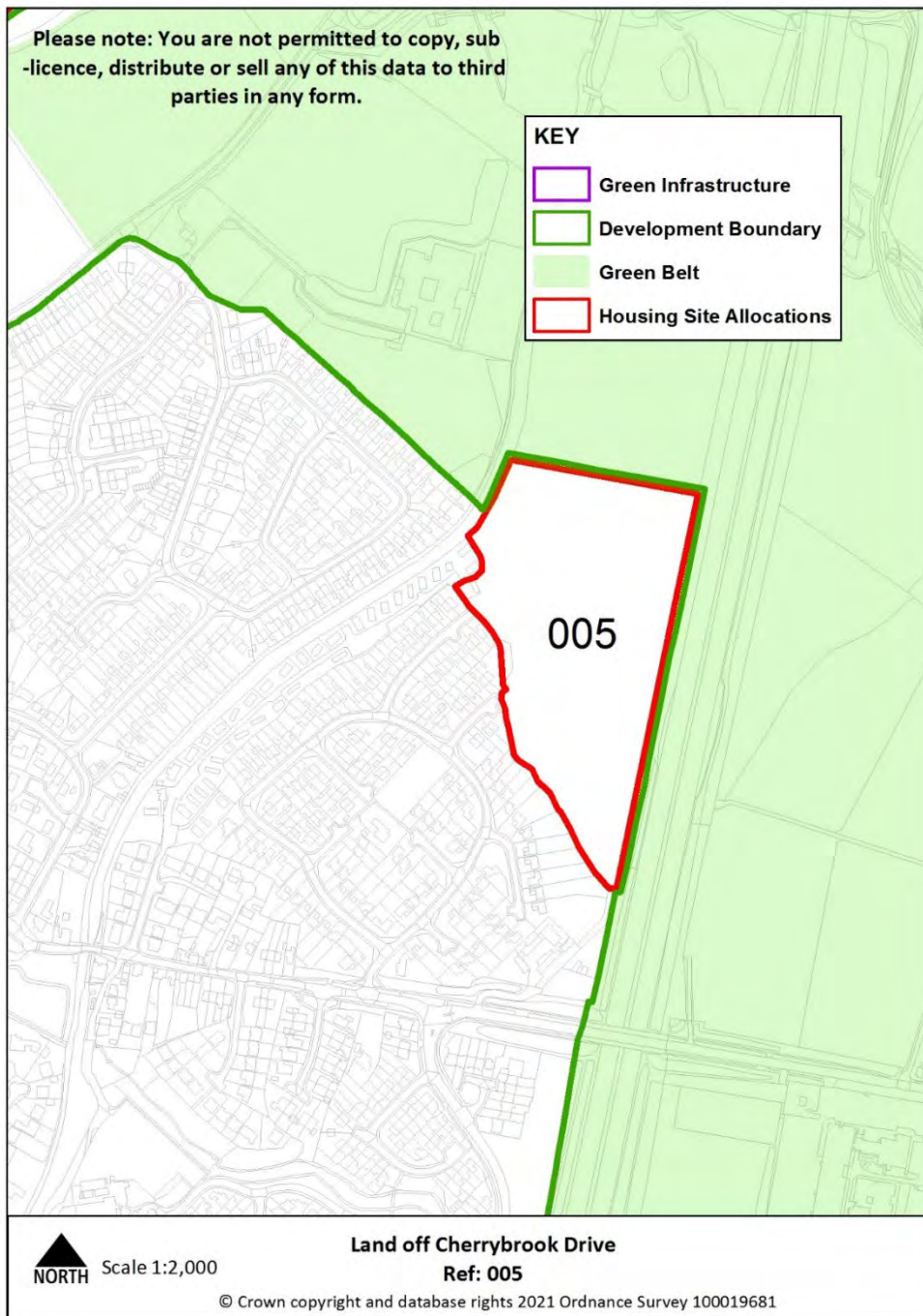


Key infrastructure requirements	Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.
Proposed access	Provide vehicular and pedestrian access via Saredon Road, including extension of footway.

Penkridge

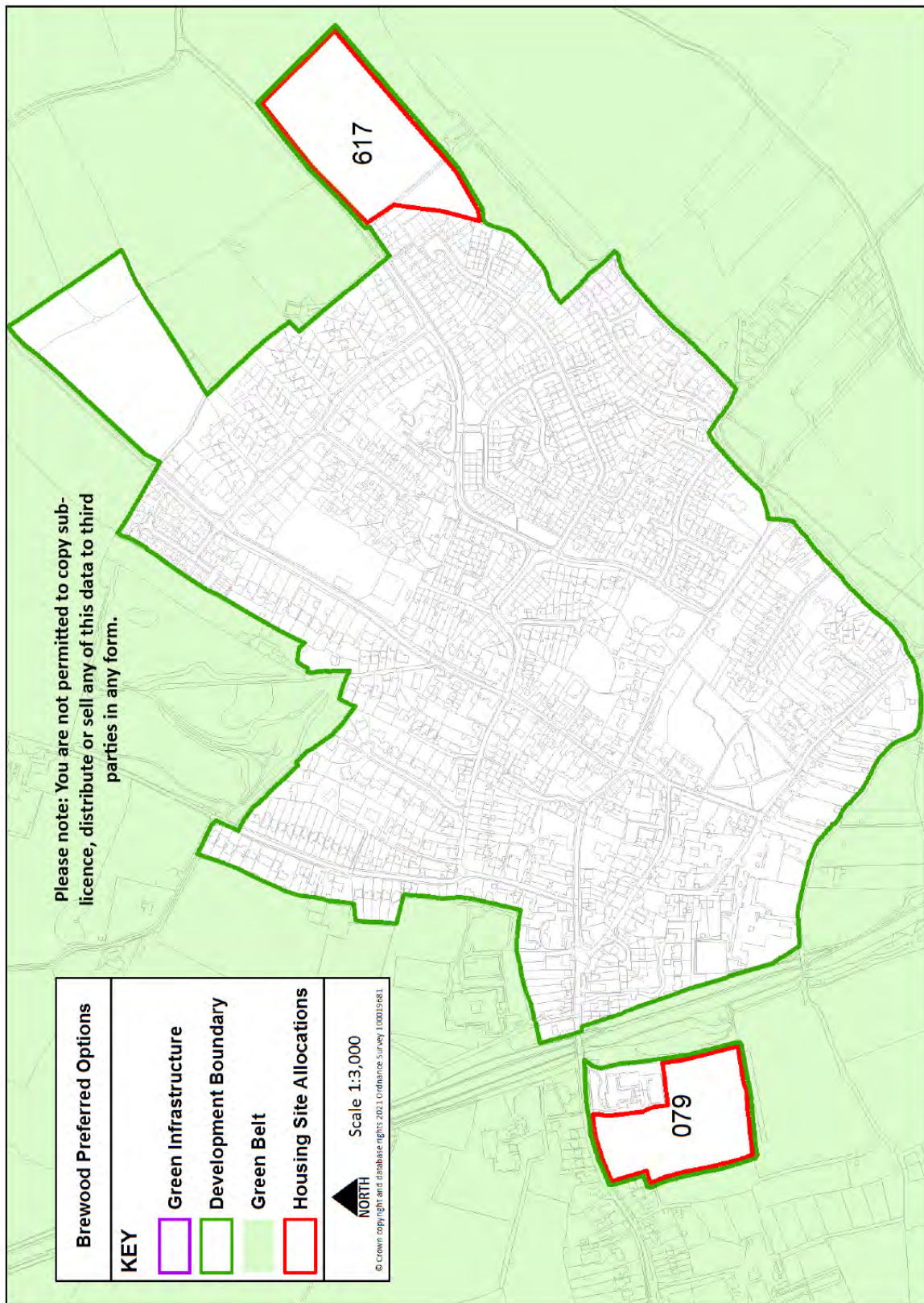


Site reference	005	Village	Penkridge
Minimum capacity	88 dwellings	Address	Land at Cherry Brook
Site area	4.2 ha	Proposed use	Housing

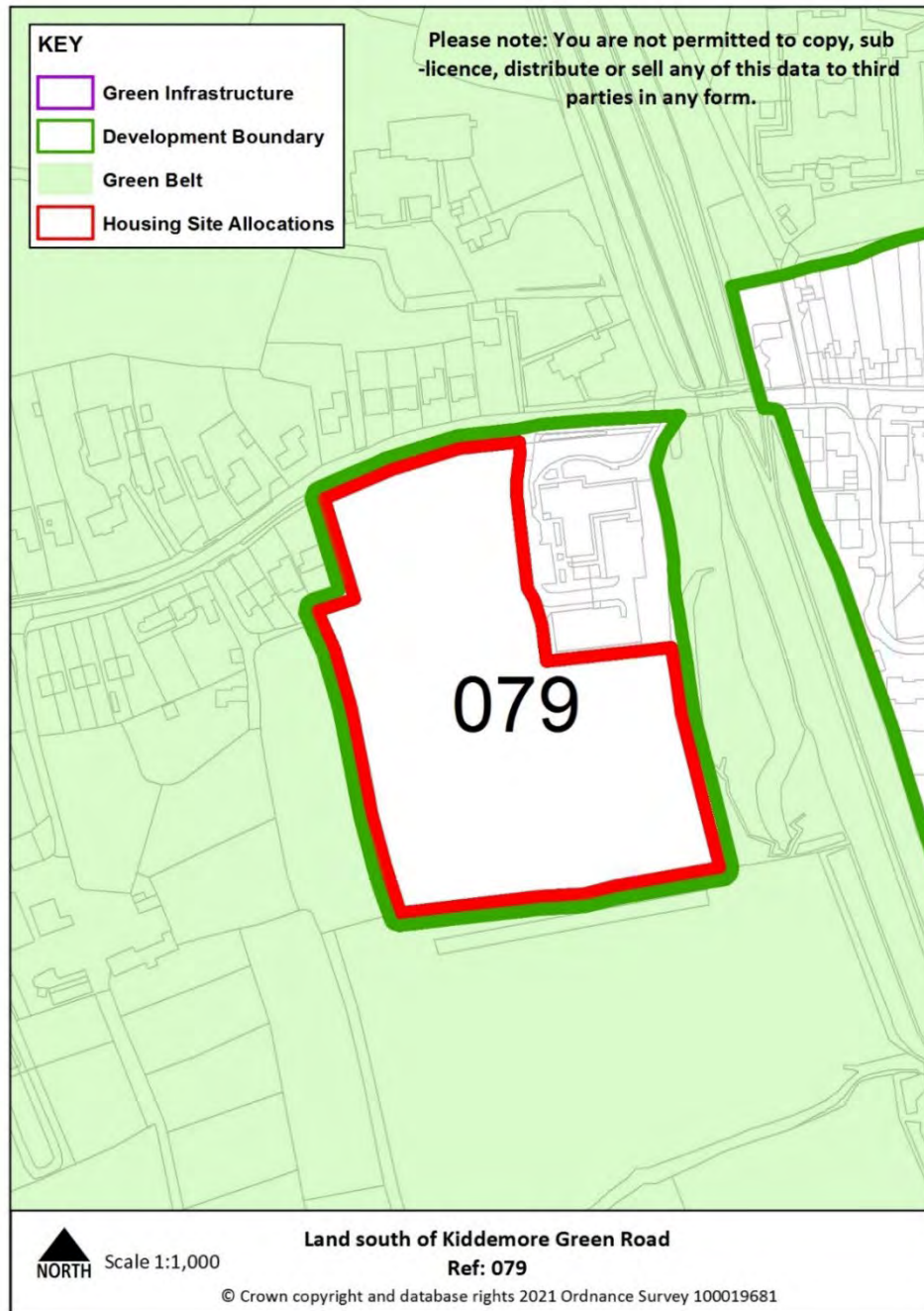


Key infrastructure requirements	Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.
Proposed access	Provide vehicular and pedestrian access via Cherrybrook Drive.

Tier 2 Brewwood

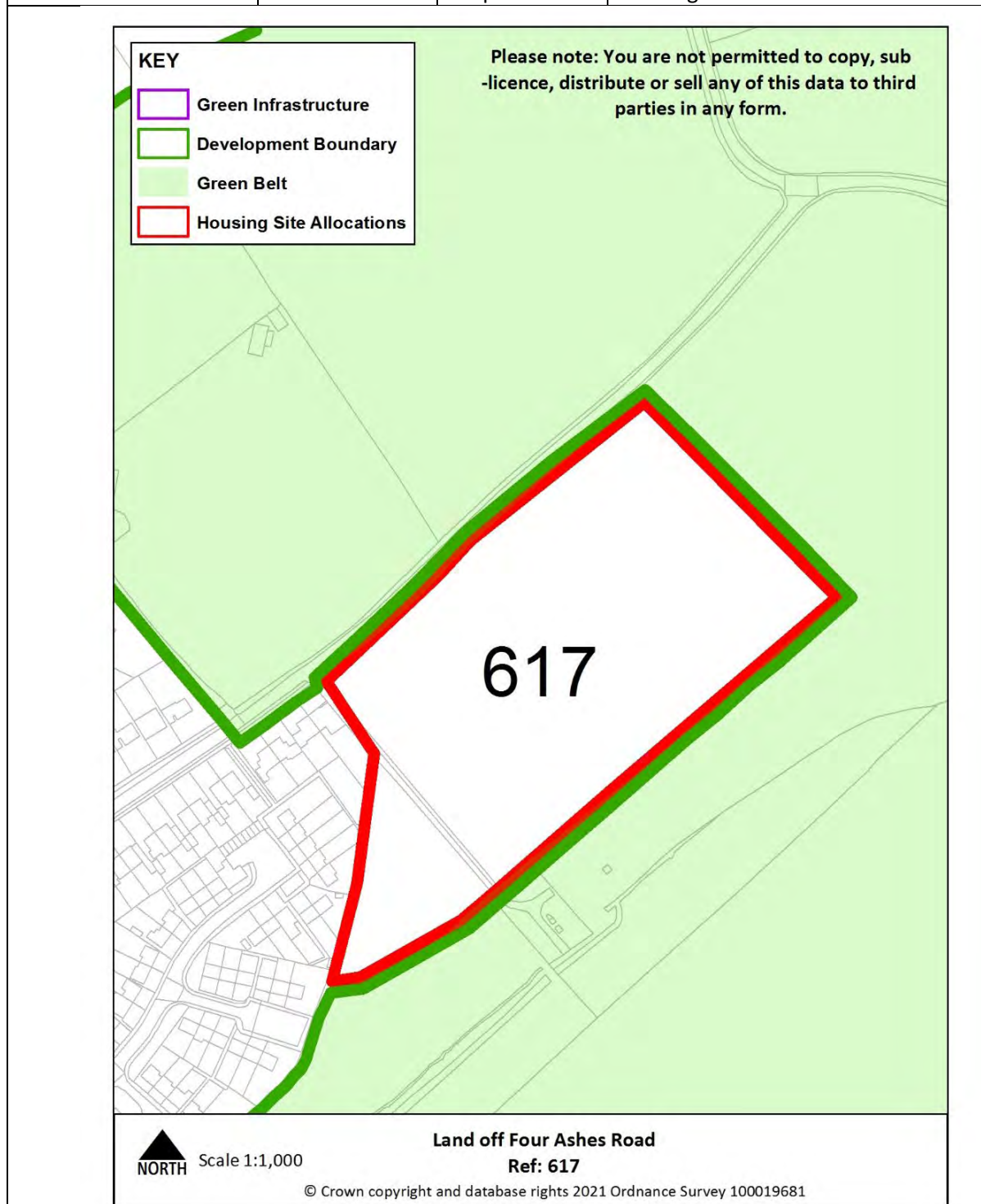


Site reference	079	Village	Brewwood
Minimum capacity	43 dwellings	Address	Land south of Kiddemore Green Road
Site area	2.1 ha	Proposed use	Housing (including older persons specialist housing)



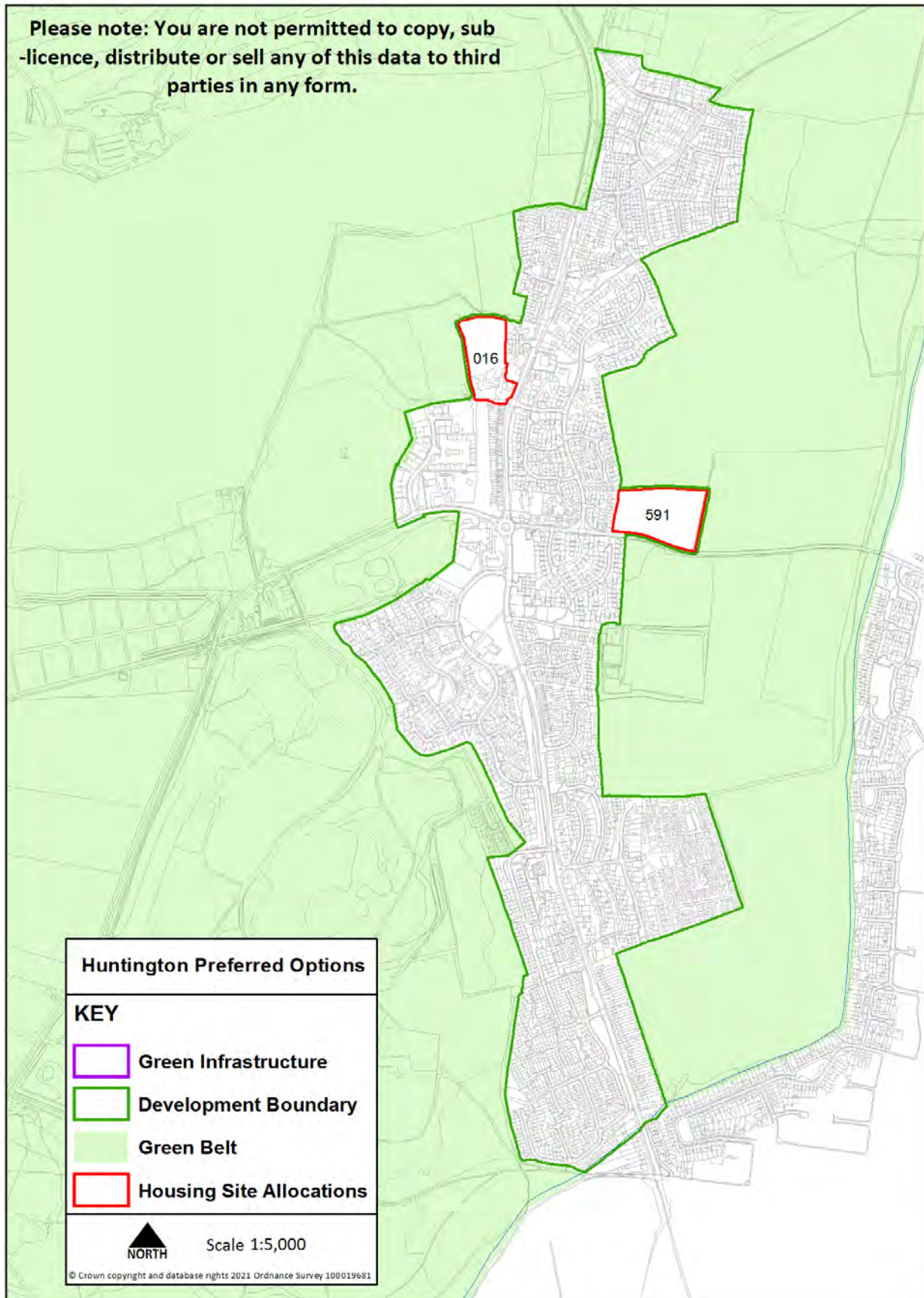
Key infrastructure requirements	<ul style="list-style-type: none"> To deliver on-site specialist older persons housing Any other relevant development plan requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure.
Proposed access	Provide vehicular and pedestrian access via Kiddemore Green Road, including using existing medical surgery access.

Site reference	617	Village	Brewood
Minimum capacity	63 dwellings	Address	Four Ashes Road
Site area	3 ha	Proposed use	Housing

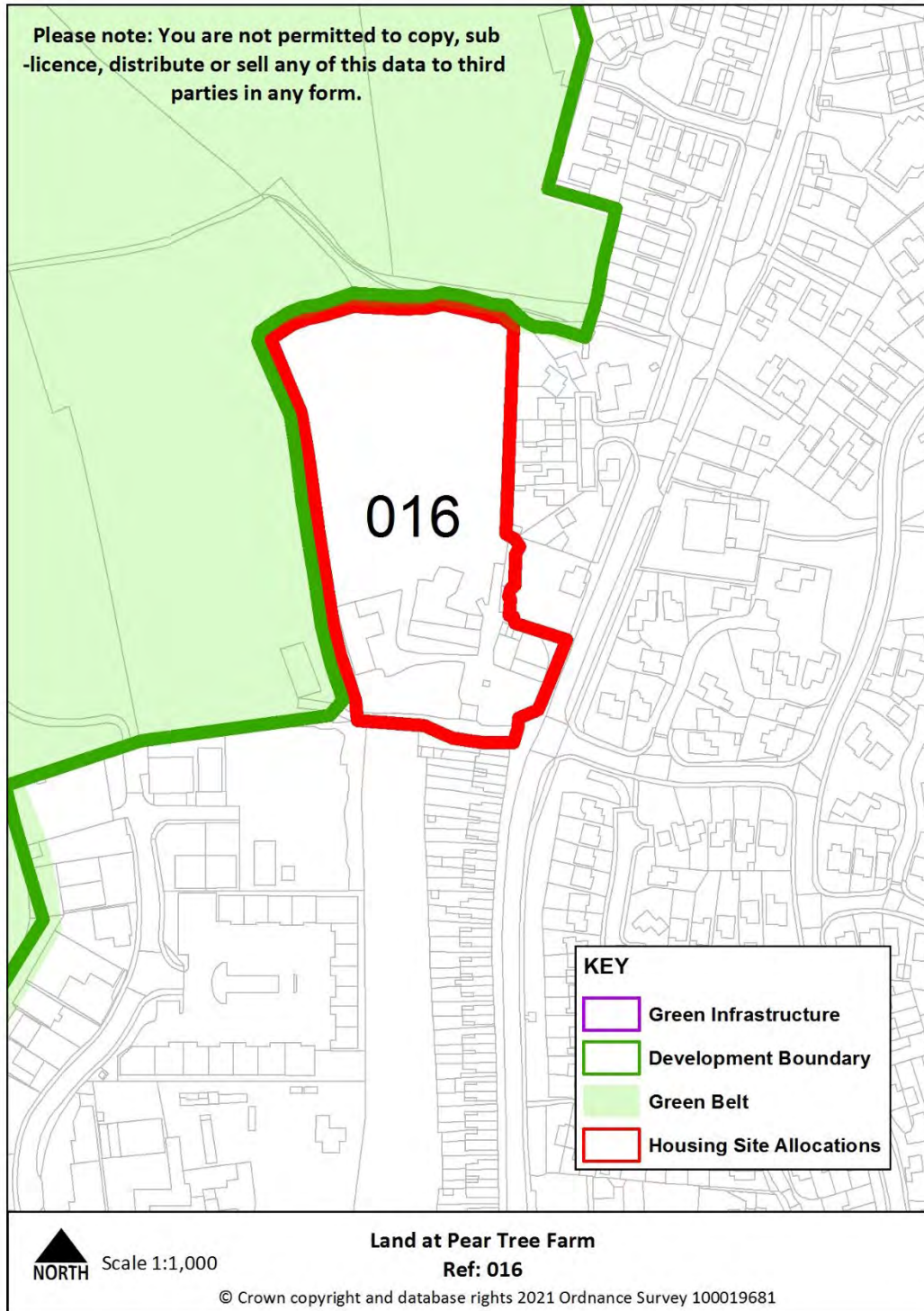


Key infrastructure requirements	Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.
Proposed access	Provide vehicular and pedestrian access via Four Ashes Road including extension of existing footway.

Huntington

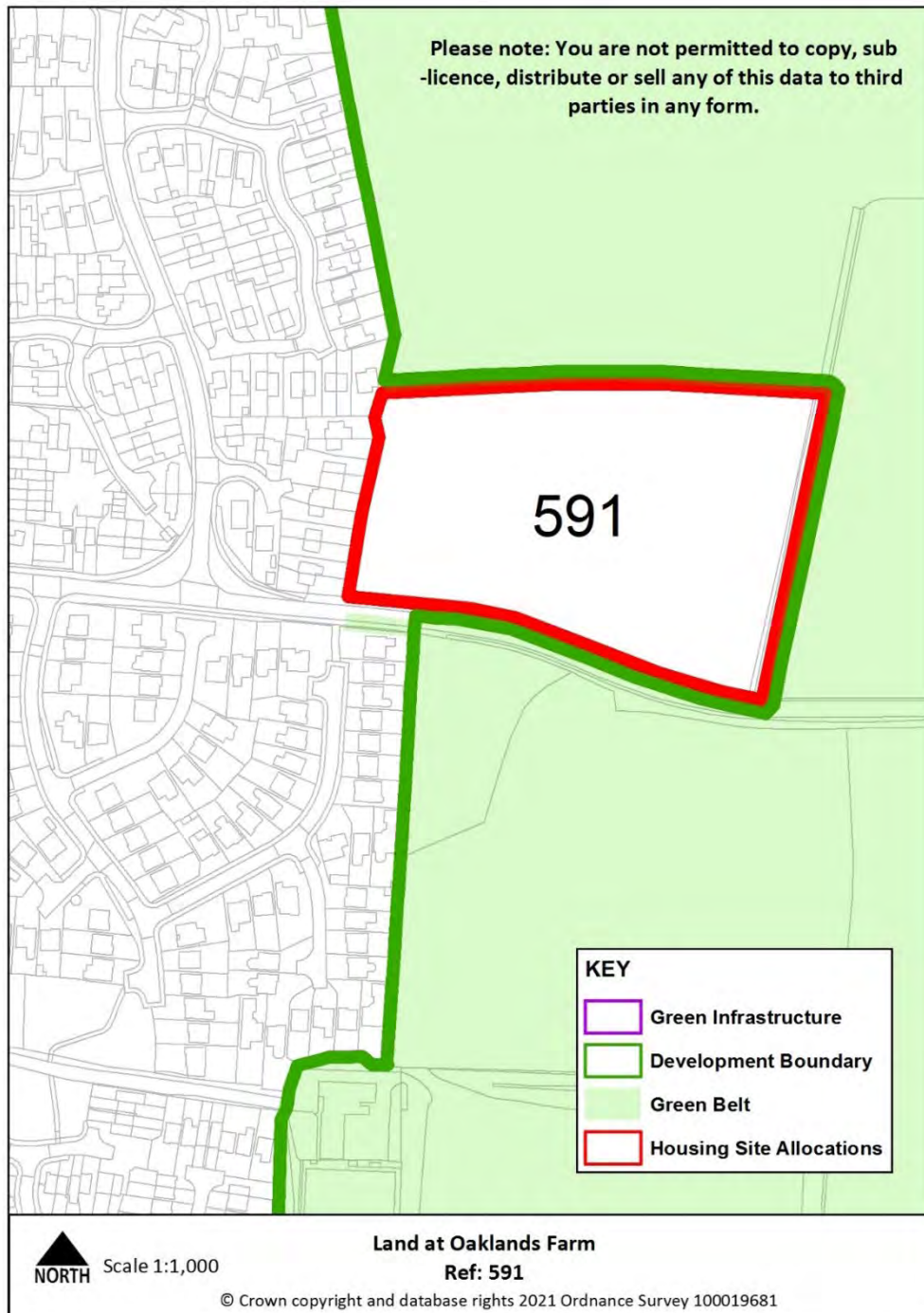


Site Reference	016	Village	Huntington
Minimum capacity	39	Address	Land at Pear Tree Farm
Site area	1.6 ha	Proposed Use	Housing



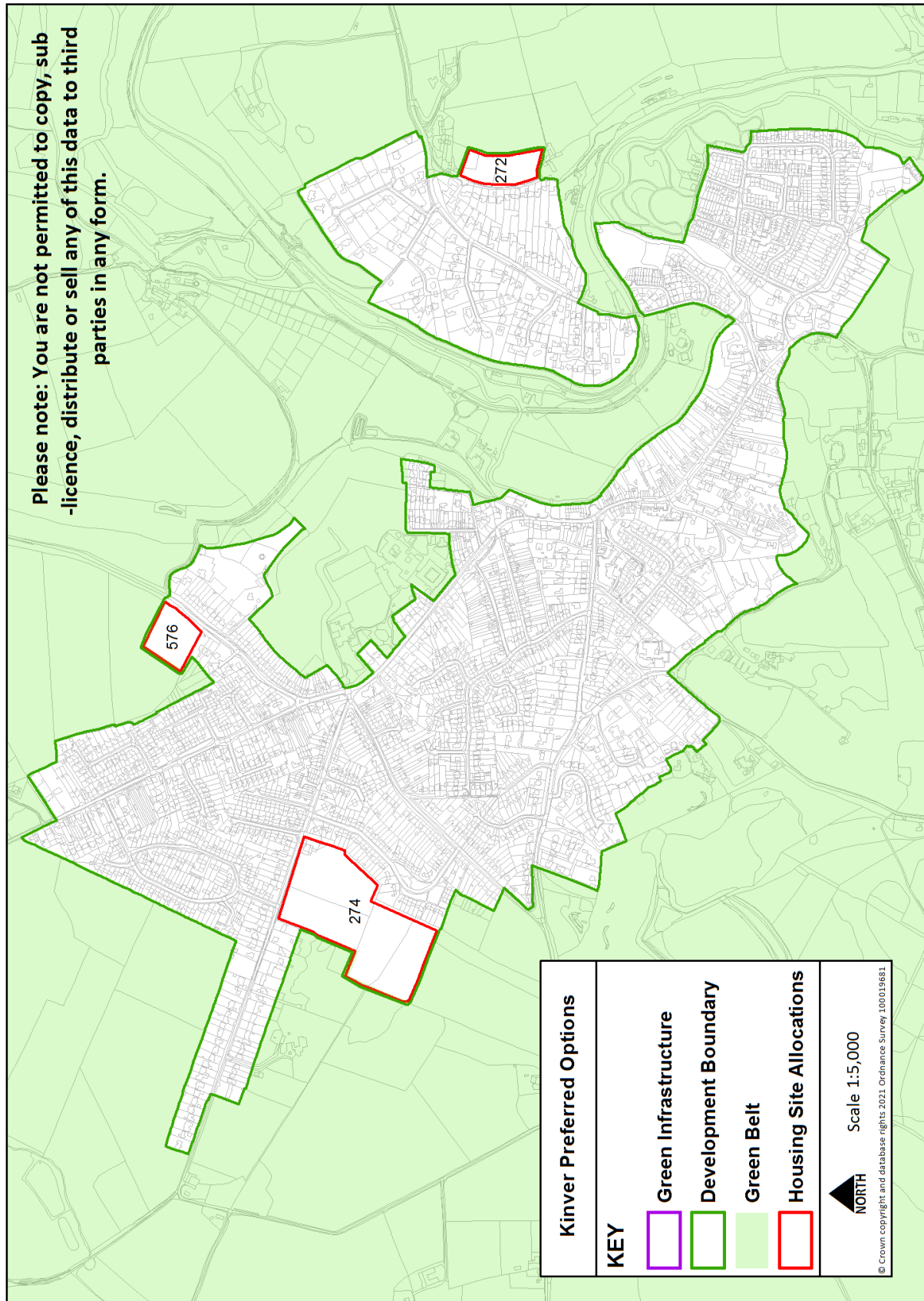
Key infrastructure requirements	Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.
Proposed access	Provide vehicular and pedestrian access via Stafford Road.

Site reference	591	Village	Huntington
Minimum capacity	44 dwellings	Address	Land at Oaklands Farm (north of Limepit Lane)
Site area	2.0 ha	Proposed use	Housing

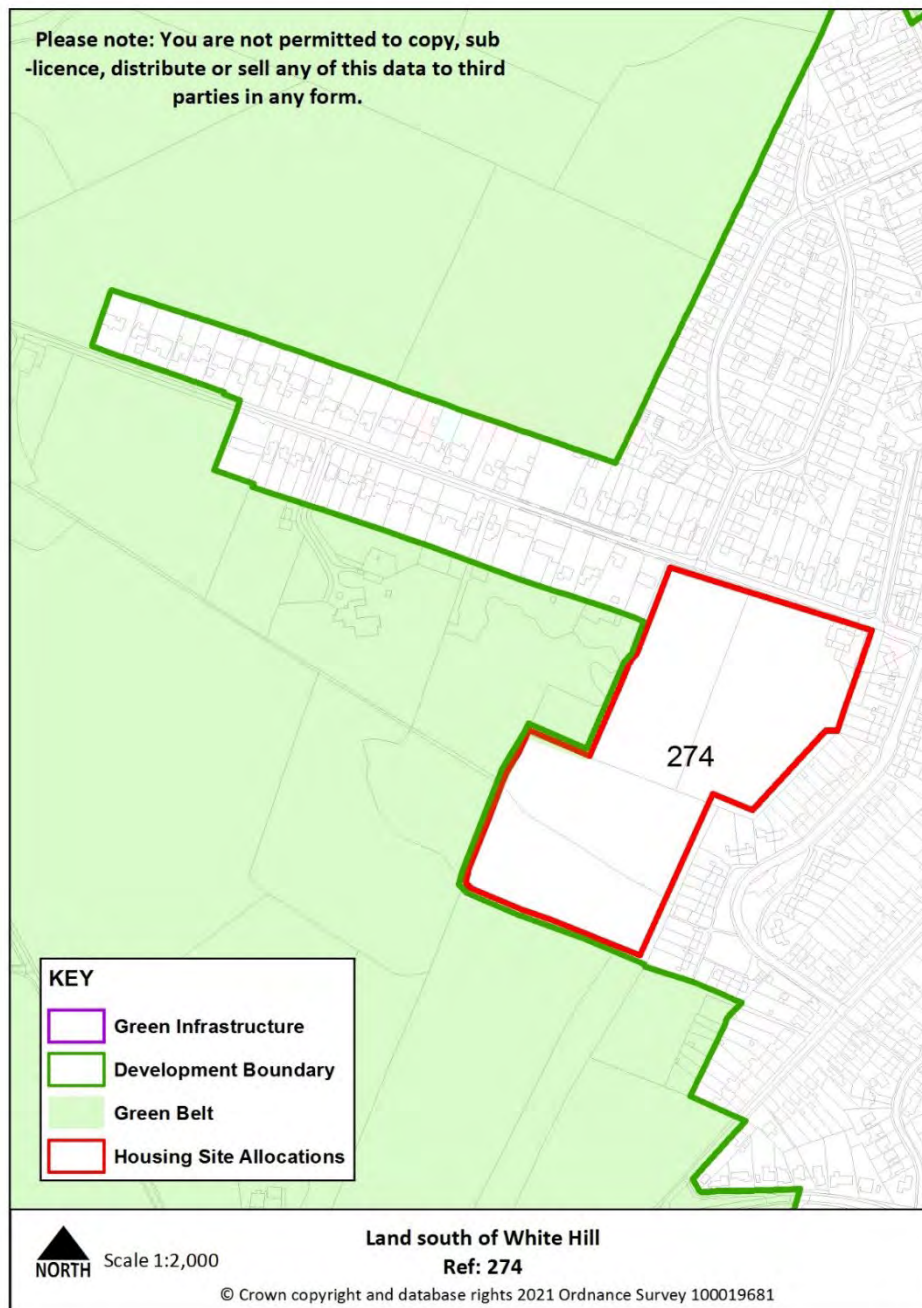


Key infrastructure requirements	Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.
Proposed access	Provide vehicular and pedestrian access via Limepit Lane.

Kinver

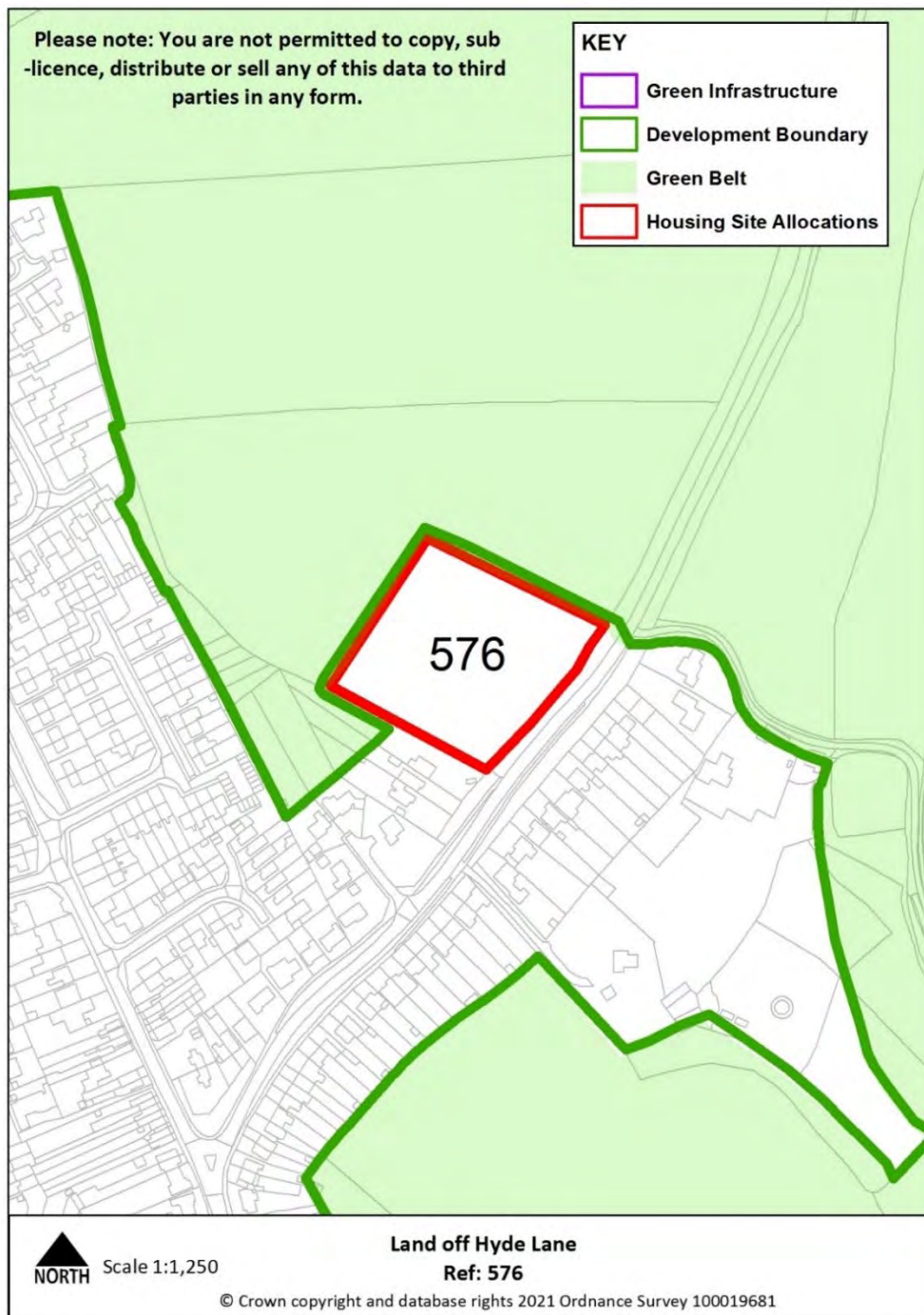


Site reference	274	Village	Kinver
Minimum capacity	Up to 38 dwellings consented on allocated site (20/00621/OUT) alongside minimum 82 dwellings on safeguarded land	Address	Land south of White Hill
Site area	5.5 ha	Proposed use	Housing



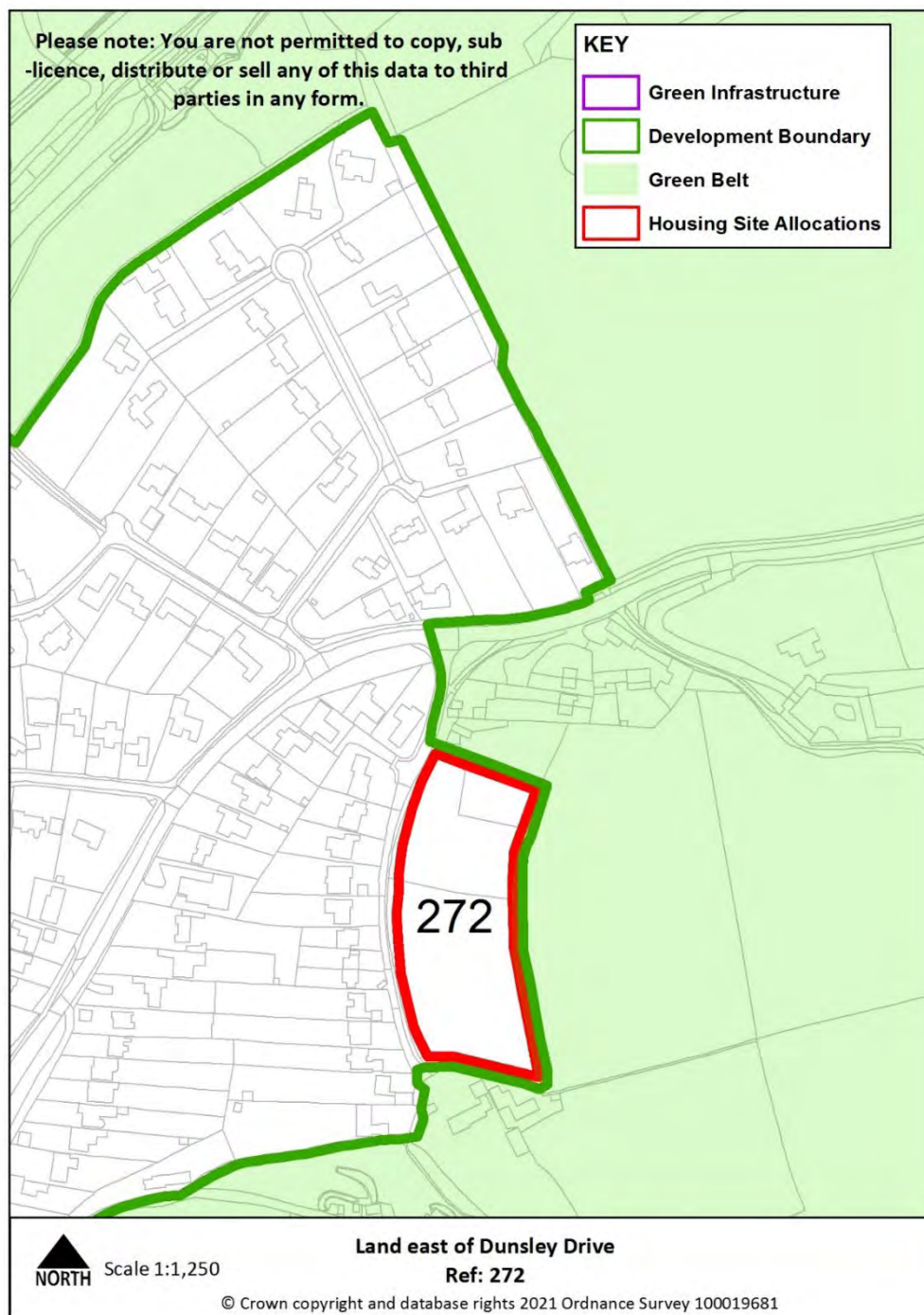
Key infrastructure requirements	Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.
Proposed access	Provide vehicular and pedestrian access via White Hill.

Site reference	576	Village	Kinver
Minimum capacity	22 dwellings	Address	Land off Hyde Lane (west)
Site area	1 ha	Proposed Use	Housing



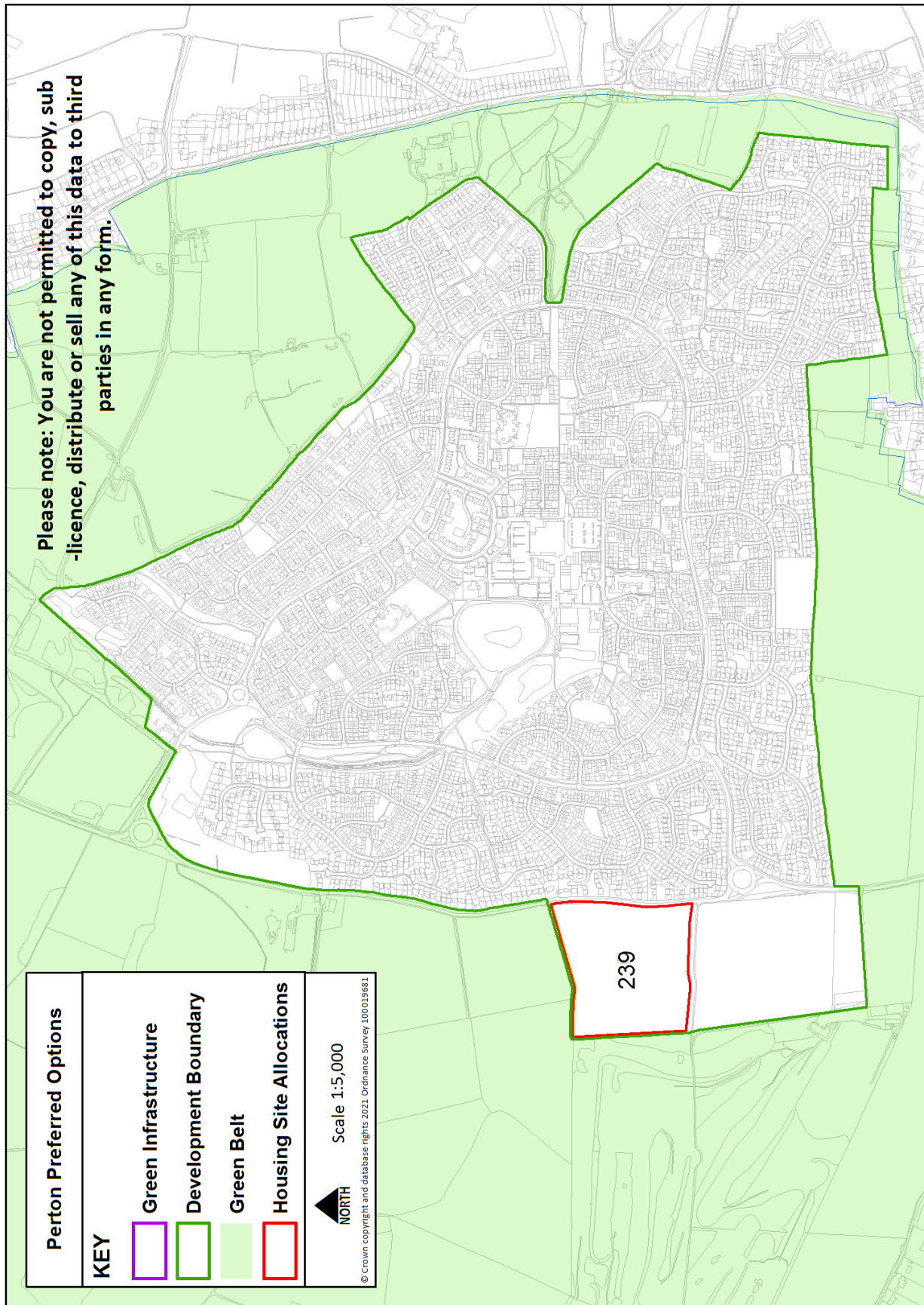
Key infrastructure requirements	Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.
Proposed access	Provide vehicular and pedestrian access via Hyde Lane, including extension of existing footway.

Site reference	272	Village	Kinver
Minimum capacity	22 dwellings	Address	Land east of Dunsley Drive
Site area	1 ha	Proposed use	Housing

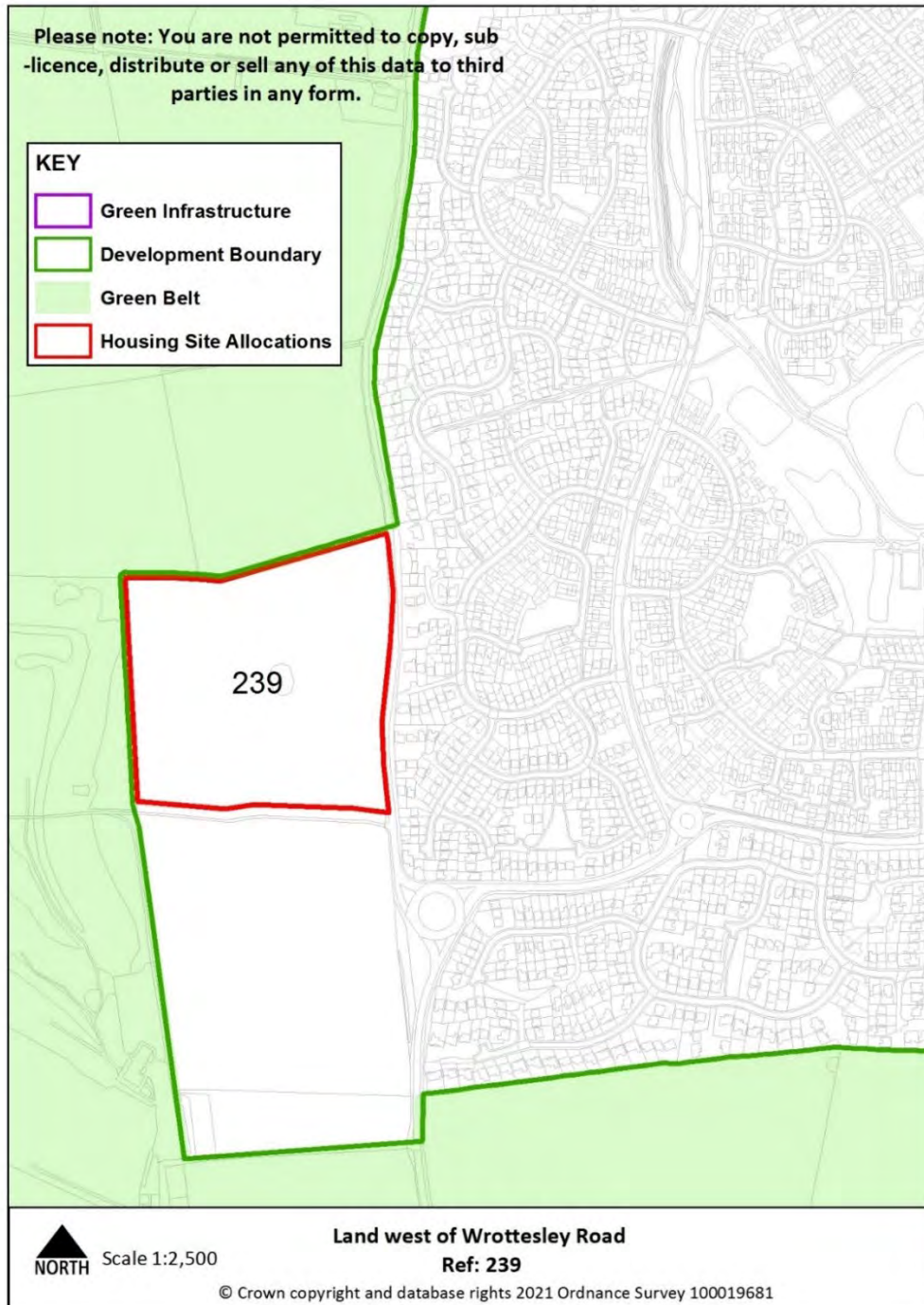


Key infrastructure requirements	Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.
Proposed access	Provide vehicular and pedestrian access to public highway.

Perton

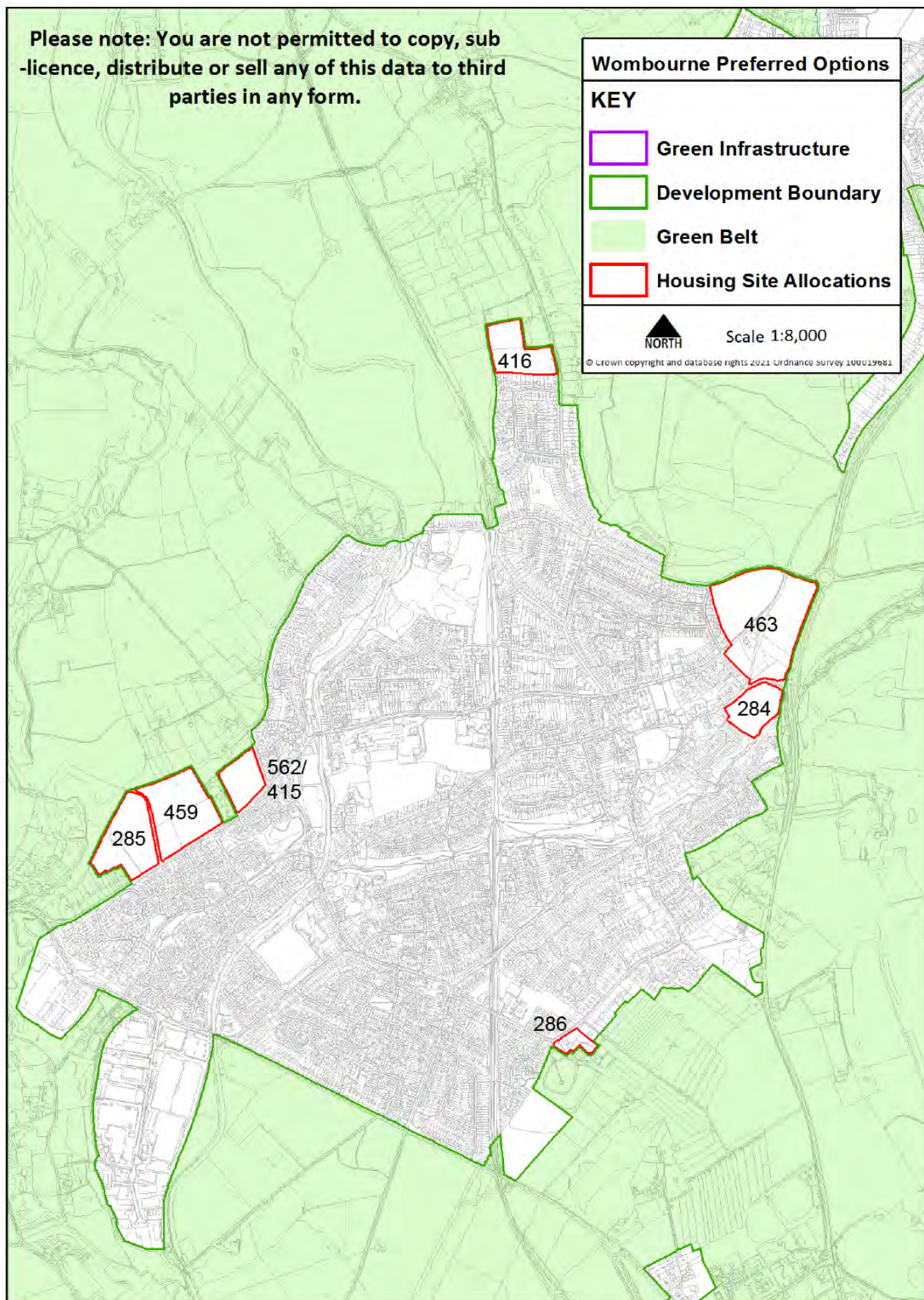


Site reference	239	Village	Perton
Minimum capacity	150 dwellings	Address	Land west of Wrottesley Park Road (south)
Site area	7.2 ha	Proposed use	Housing

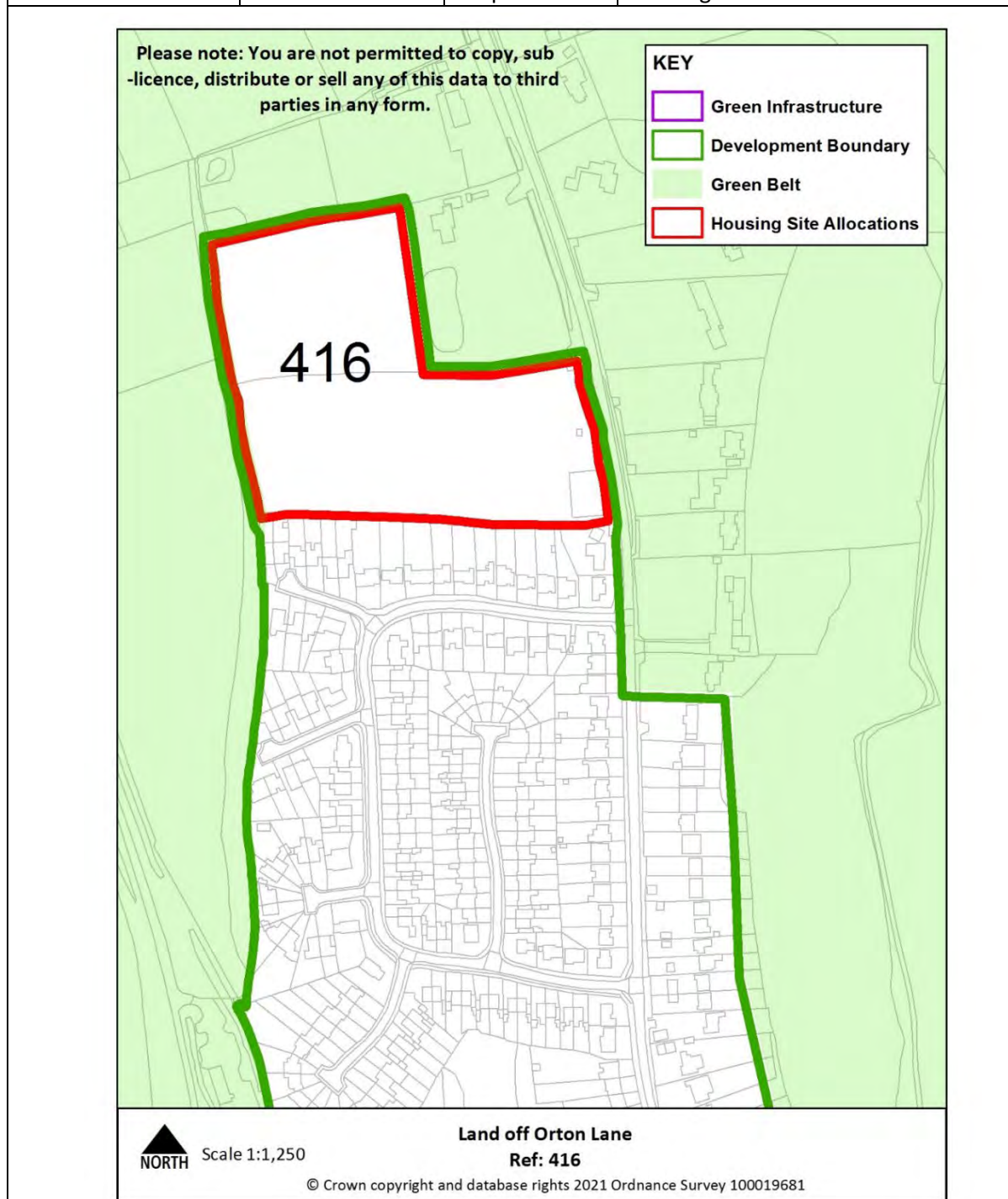


Key infrastructure requirements	Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.
Proposed access	Provide vehicular and pedestrian access via Wrottesley Park Road and pedestrian access into neighbouring allocated site.

Wombourne

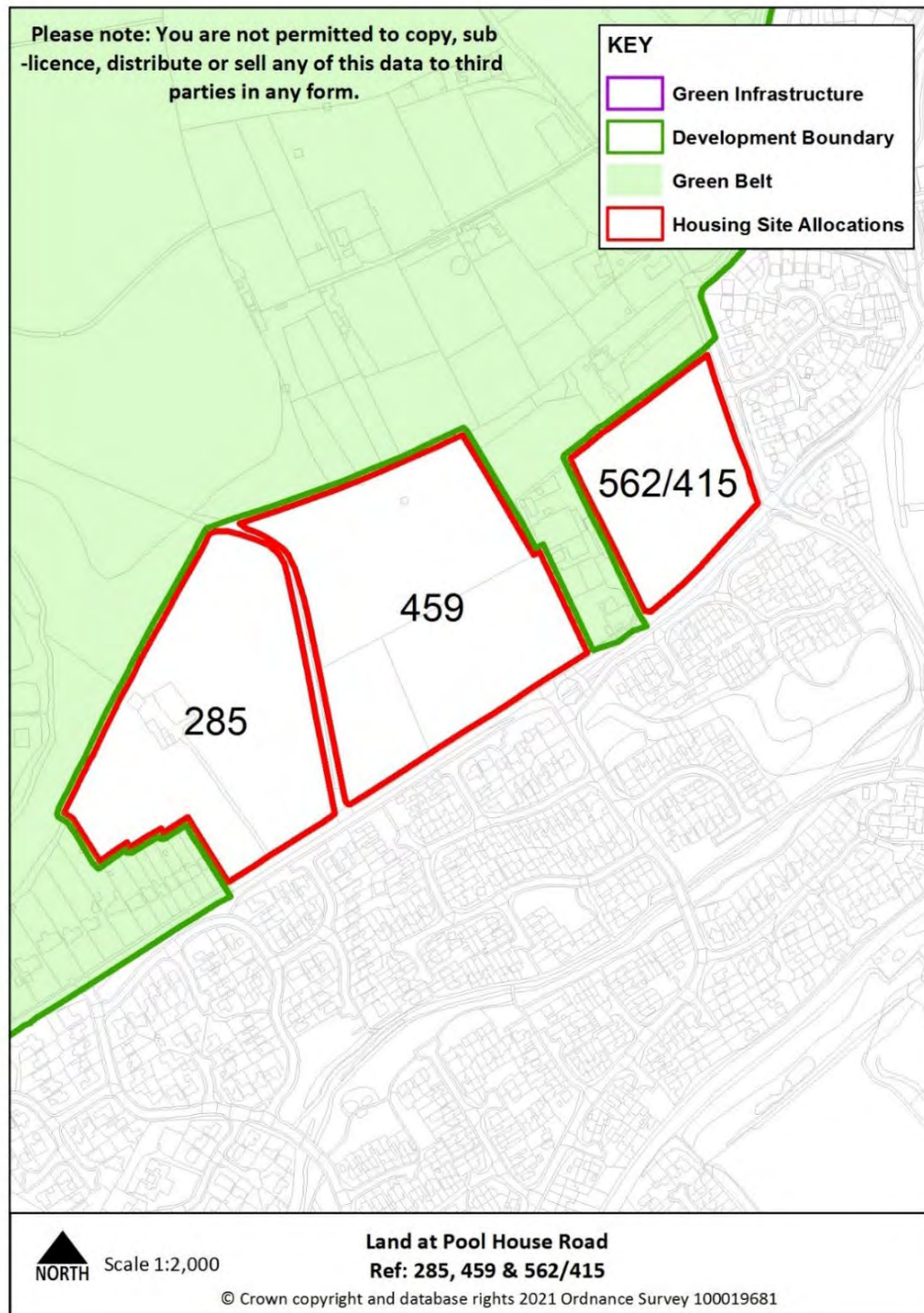


Site Reference	416	Village	Wombourne
Minimum capacity	57 dwellings	Address	Land off Orton Lane
Site area	2.8	Proposed Use	Housing



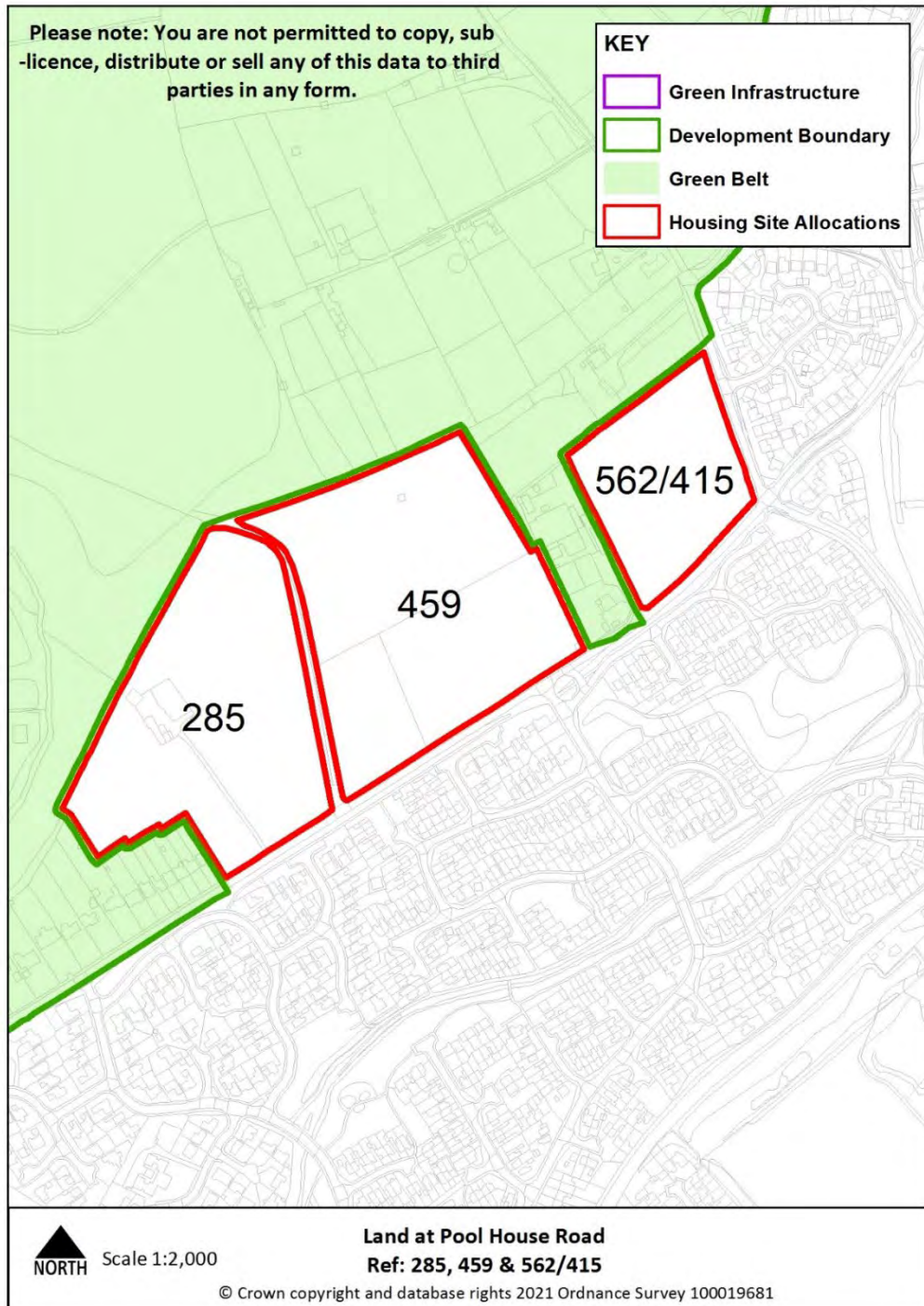
Key infrastructure requirements	Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.
Proposed access	Provide vehicular and pedestrian access via Orton Lane, including extension of existing footway.

Site reference	285	Village	Wombourne
Minimum capacity	82 dwellings	Address	Land off Pool House Road
Site area	3.9 ha	Proposed use	Housing



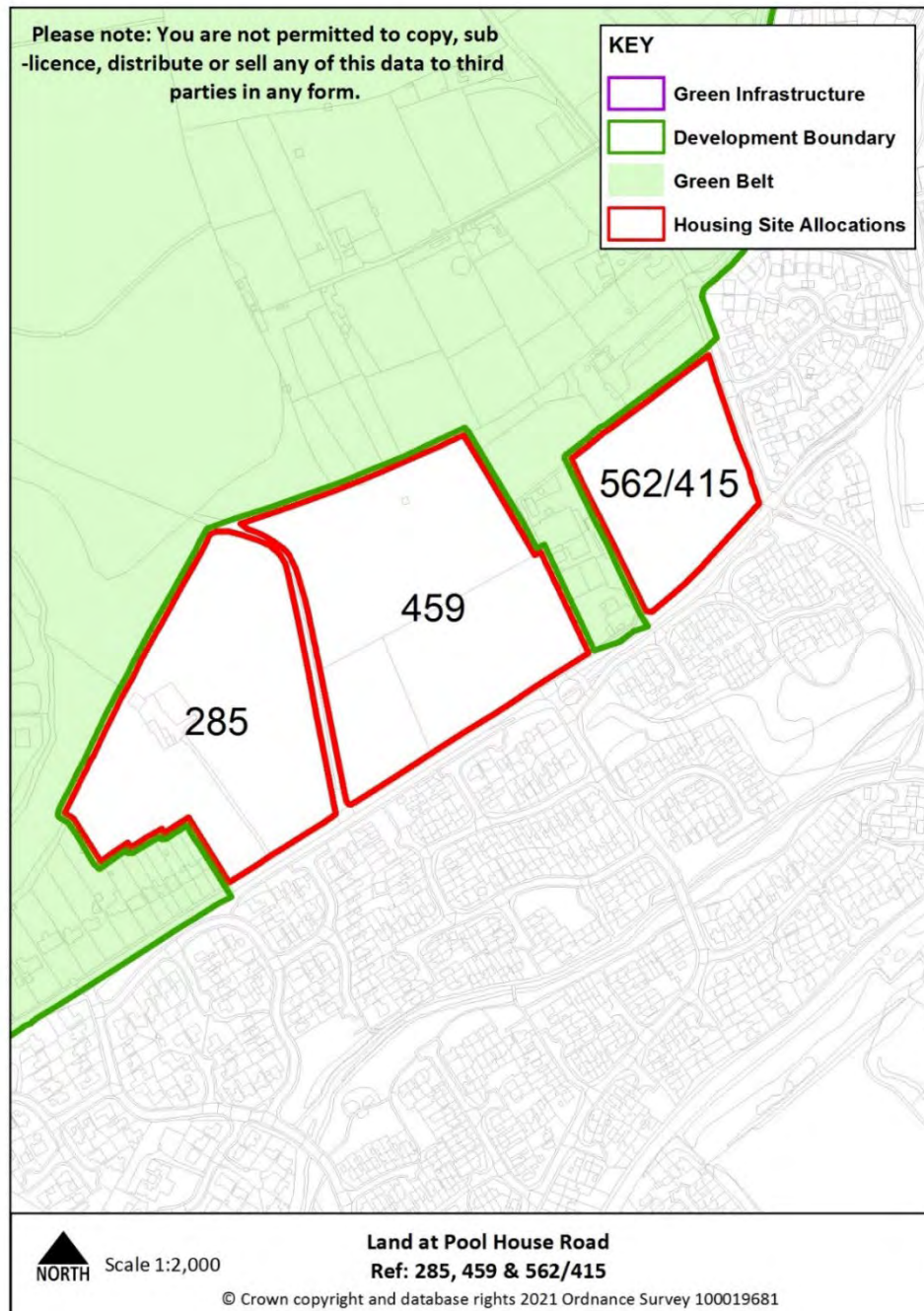
Key infrastructure requirements	<ul style="list-style-type: none"> • Provide highway and pedestrian connectivity to site 459. • Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.
Proposed access	Provide vehicular and pedestrian access via Pool House Road alongside pedestrian links to the village centre along Ounsdale Road.

Site reference	562/415	Village	Wombourne
Minimum capacity	44 dwellings	Address	Land off Pool House Road
Site area	1.9 ha	Proposed use	Housing



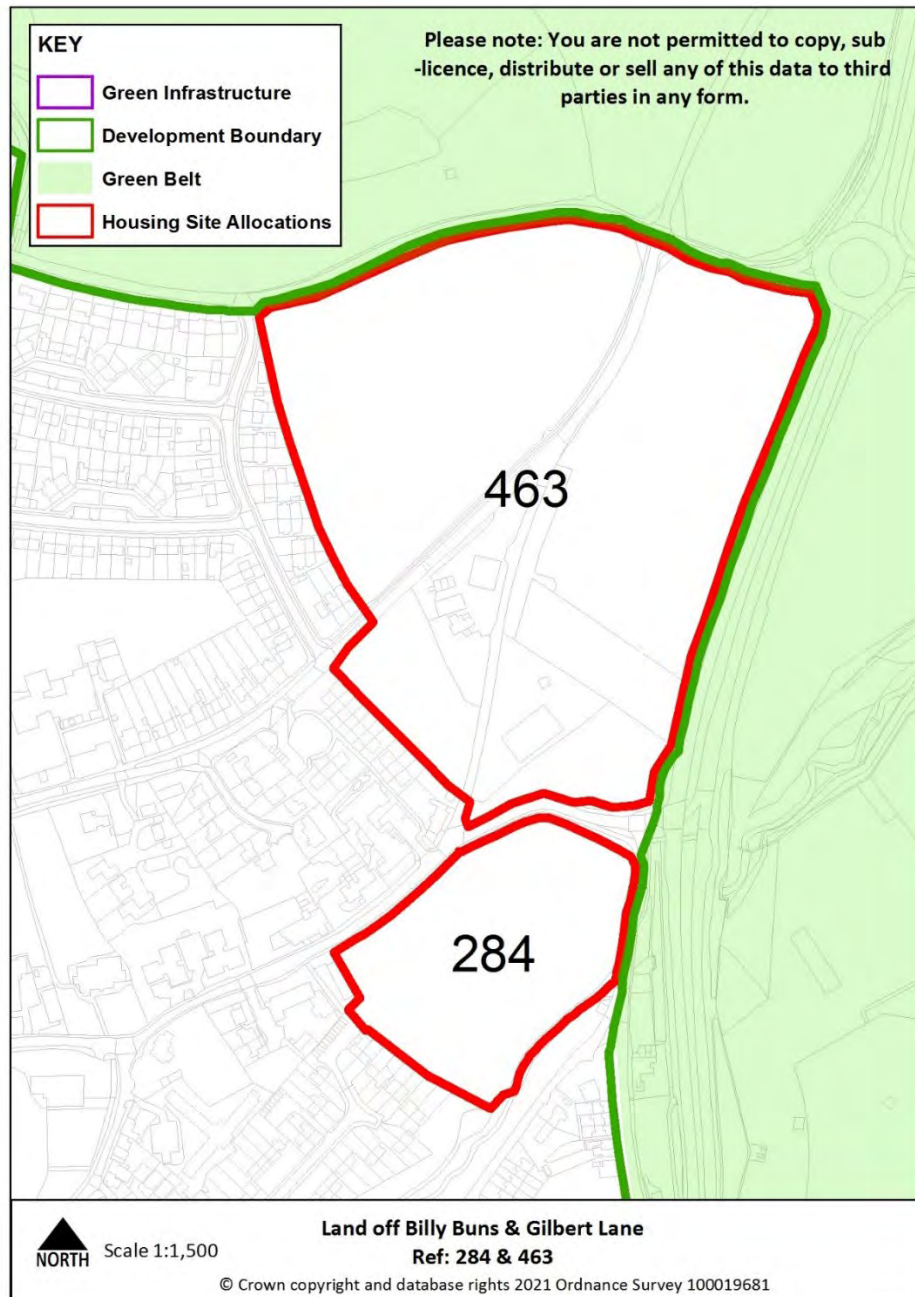
Key infrastructure requirements	Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.
Proposed access	Provide vehicular and pedestrian access via Pool House Road alongside pedestrian links to the village centre along Ounsdale Road.

Site reference	459	Village	Wombourne
Minimum capacity	97 dwellings	Address	Land off Pool House Road
Site area	4.6 ha	Proposed use	Housing



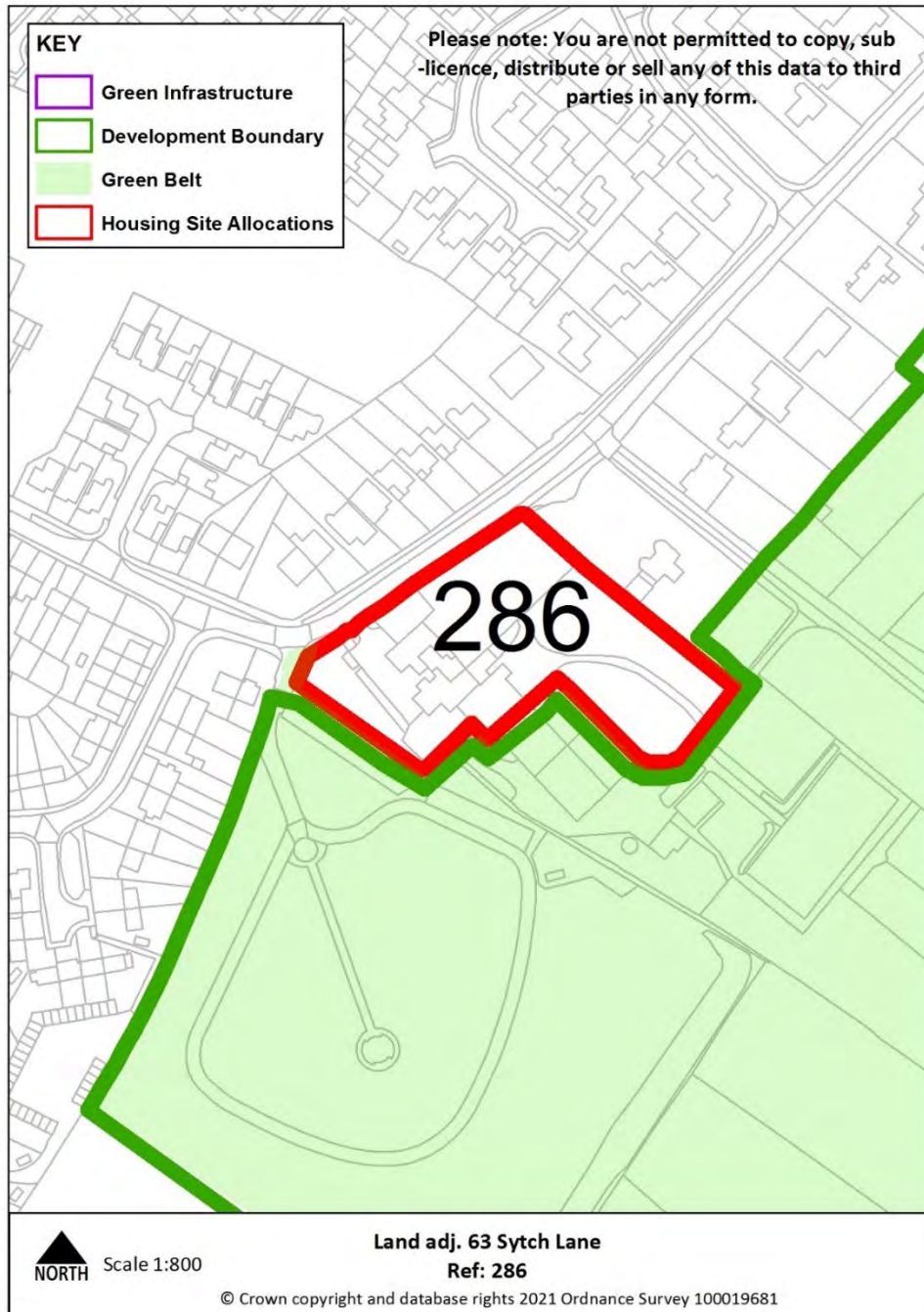
Key infrastructure requirements	<ul style="list-style-type: none"> • Provide highway and pedestrian connectivity to site 285. • Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.
Proposed access	Provide vehicular and pedestrian access via Pool House Road alongside pedestrian links to the village centre along Ounsdale Road.

Site reference	463 & 284	Village	Wombourne
Minimum capacity	223 dwellings	Address	Land off Billy Buns Lane & Gilbert Lane
Site area	10.6 ha	Proposed use	Housing



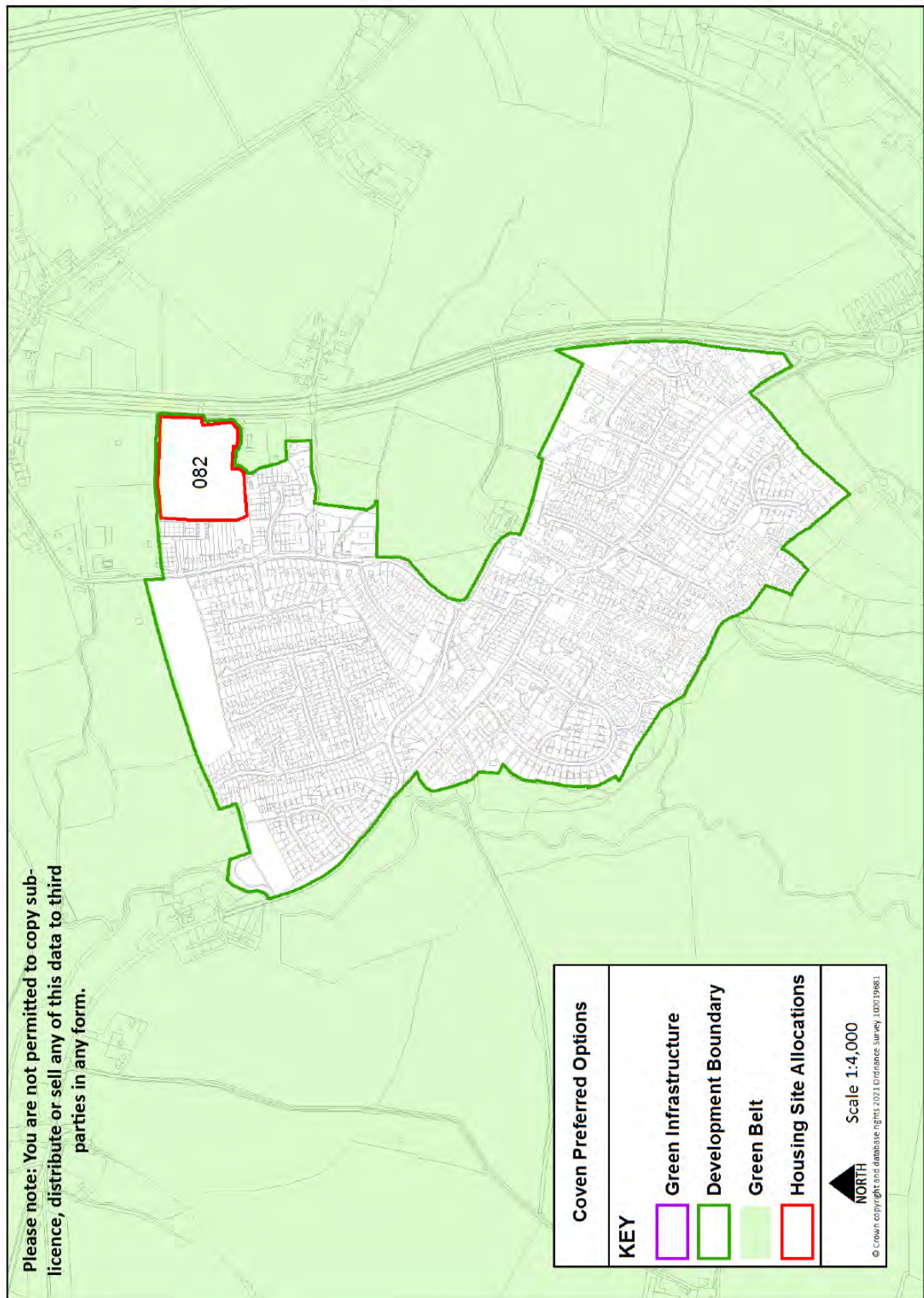
Key infrastructure requirements	Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.
Proposed access	Provide vehicular and pedestrian access via Billy Buns Lane, High Street and School Road, including extensions of existing footways.

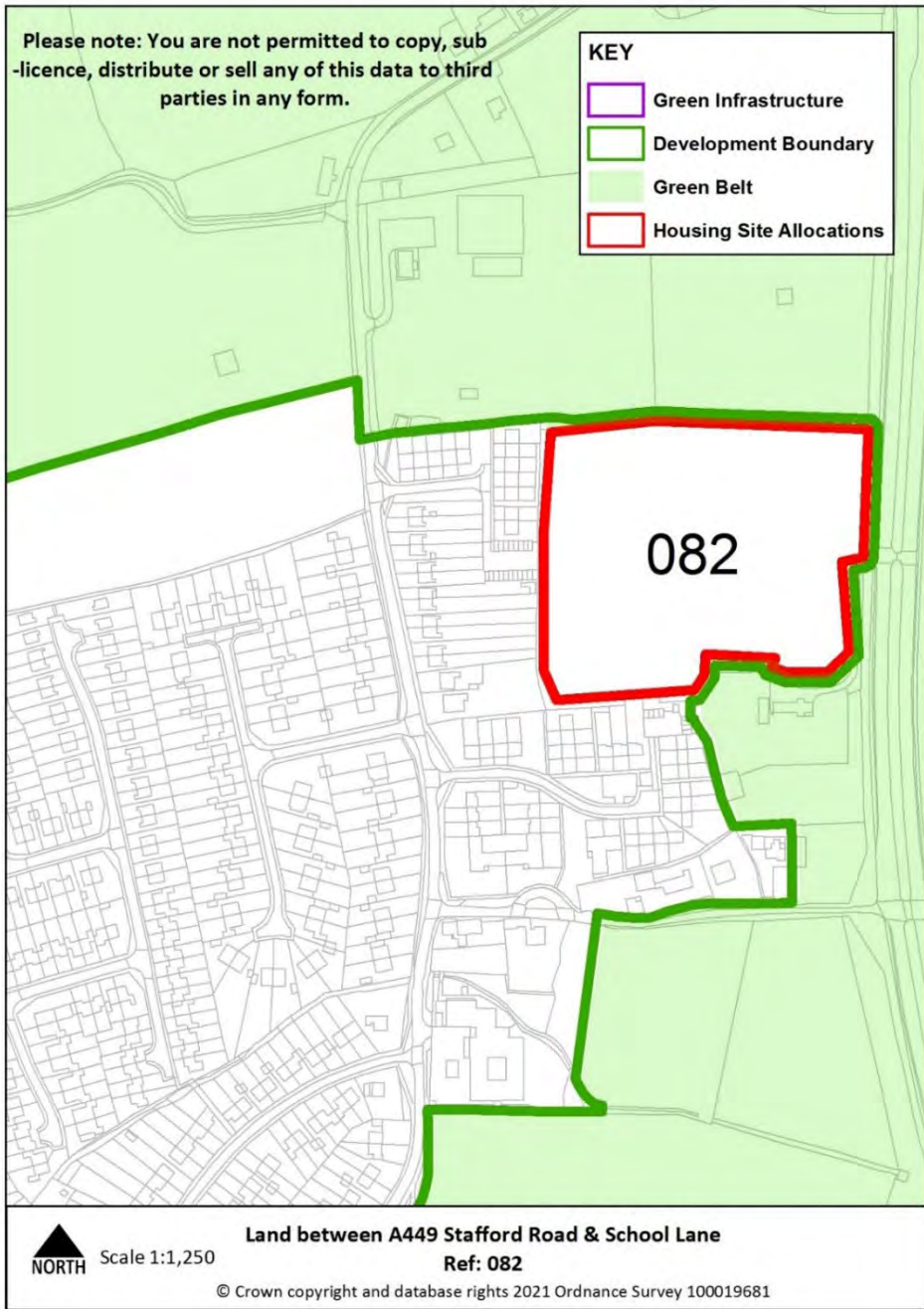
Site reference	286	Village	Wombourne
Minimum capacity	16 dwellings	Address	Land adj. 63 Sytch Lane
Site area	0.6 ha	Proposed use	Housing



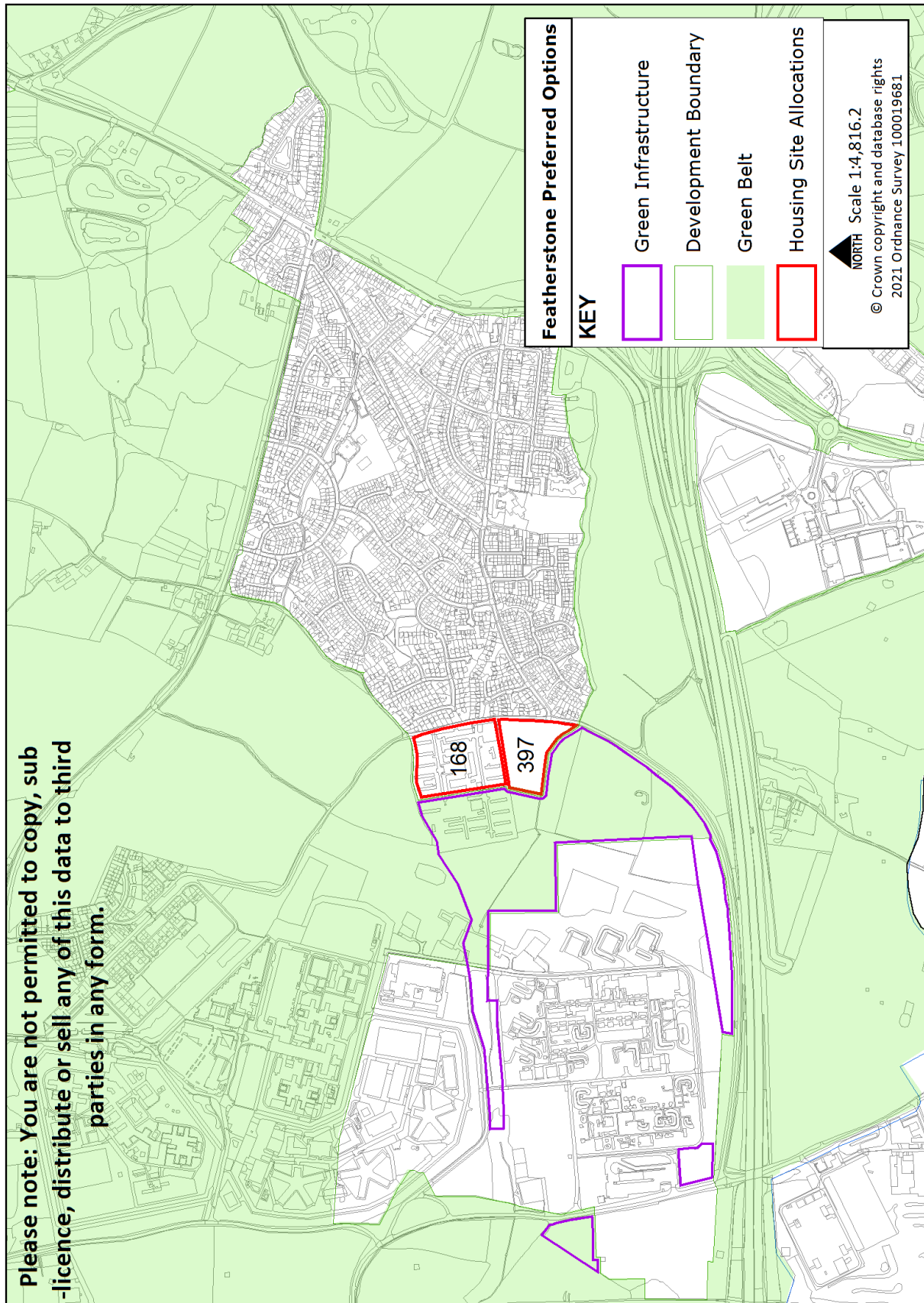
Key infrastructure requirements	Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.
Proposed access	Provide vehicular and pedestrian access via Sytch Lane.

Tier 3 Coven

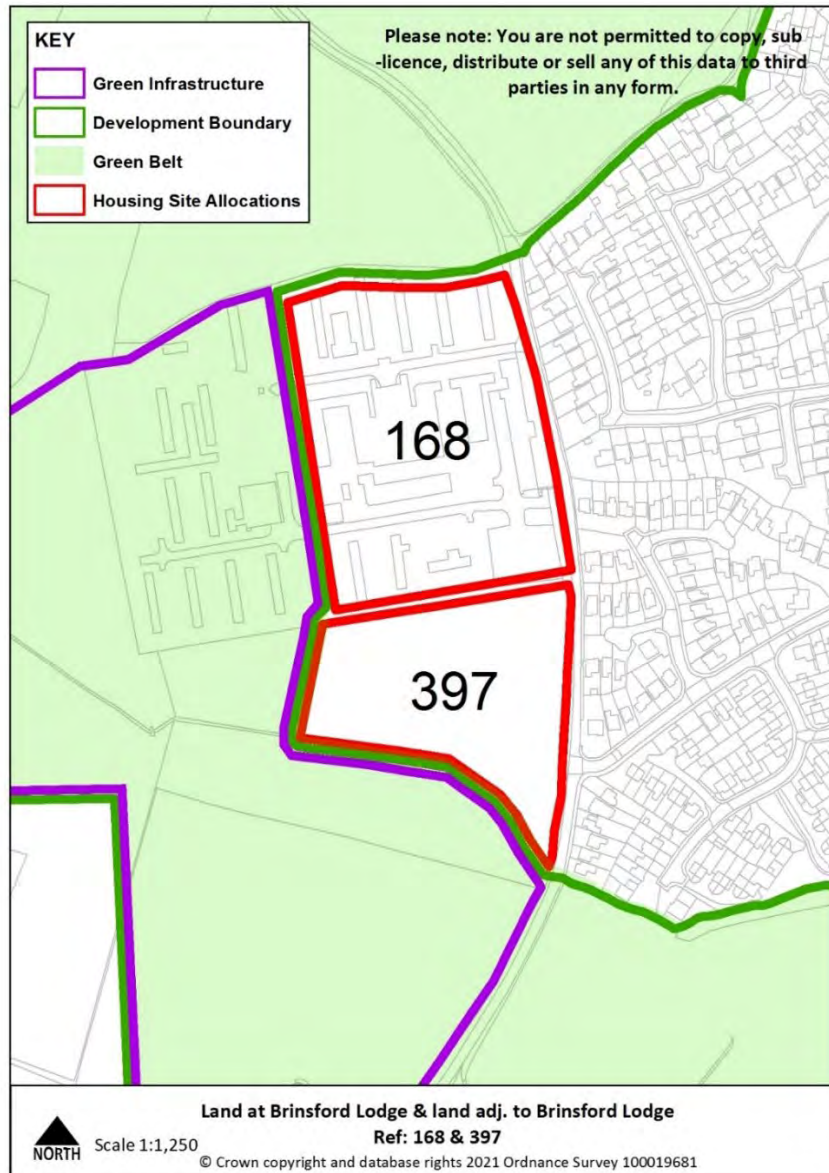


Site reference	082	Village	Coven
Minimum capacity	48 dwellings	Address	Land between A449 Stafford Road & School Lane
Site area	2.3 ha	Proposed use	Housing
<div data-bbox="331 342 1264 1653"> <p>Please note: You are not permitted to copy, sub-licence, distribute or sell any of this data to third parties in any form.</p>  <p>KEY</p> <ul style="list-style-type: none"> Green Infrastructure Development Boundary Green Belt Housing Site Allocations <p>082</p> <p>Land between A449 Stafford Road & School Lane Ref: 082</p> <p>Scale 1:1,250</p> <p>© Crown copyright and database rights 2021 Ordnance Survey 100019681</p> </div>			
Key infrastructure requirements	Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.		
Proposed access	Provide vehicular and pedestrian access via the playing fields of School Lane.		

Featherstone

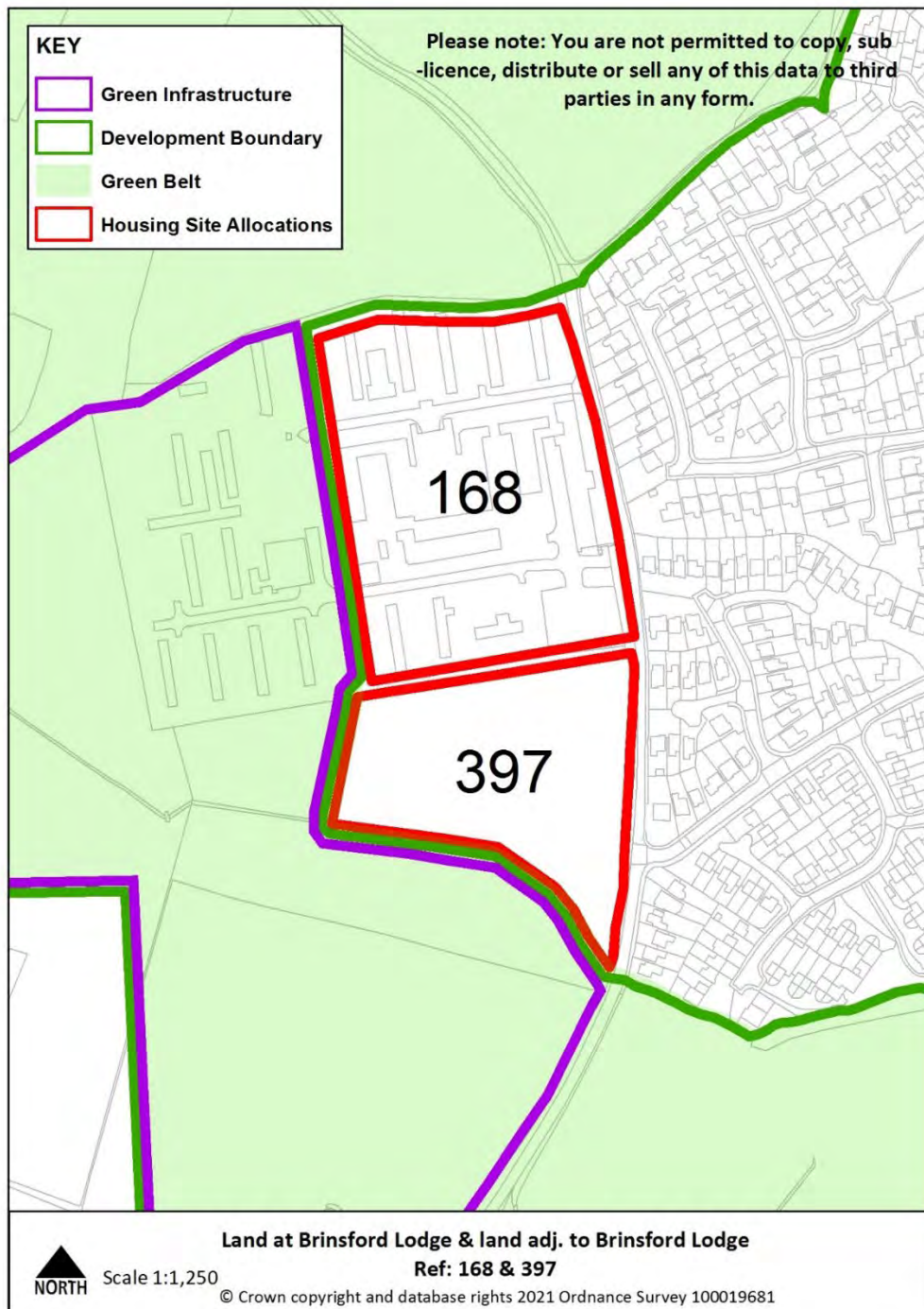


Site reference	168	Village	Featherstone
Capacity	Planning permission to deliver 81 dwellings (19/00919/FUL)	Address	Land at Brinsford Lodge
Site area	2.8 ha	Proposed use	Housing



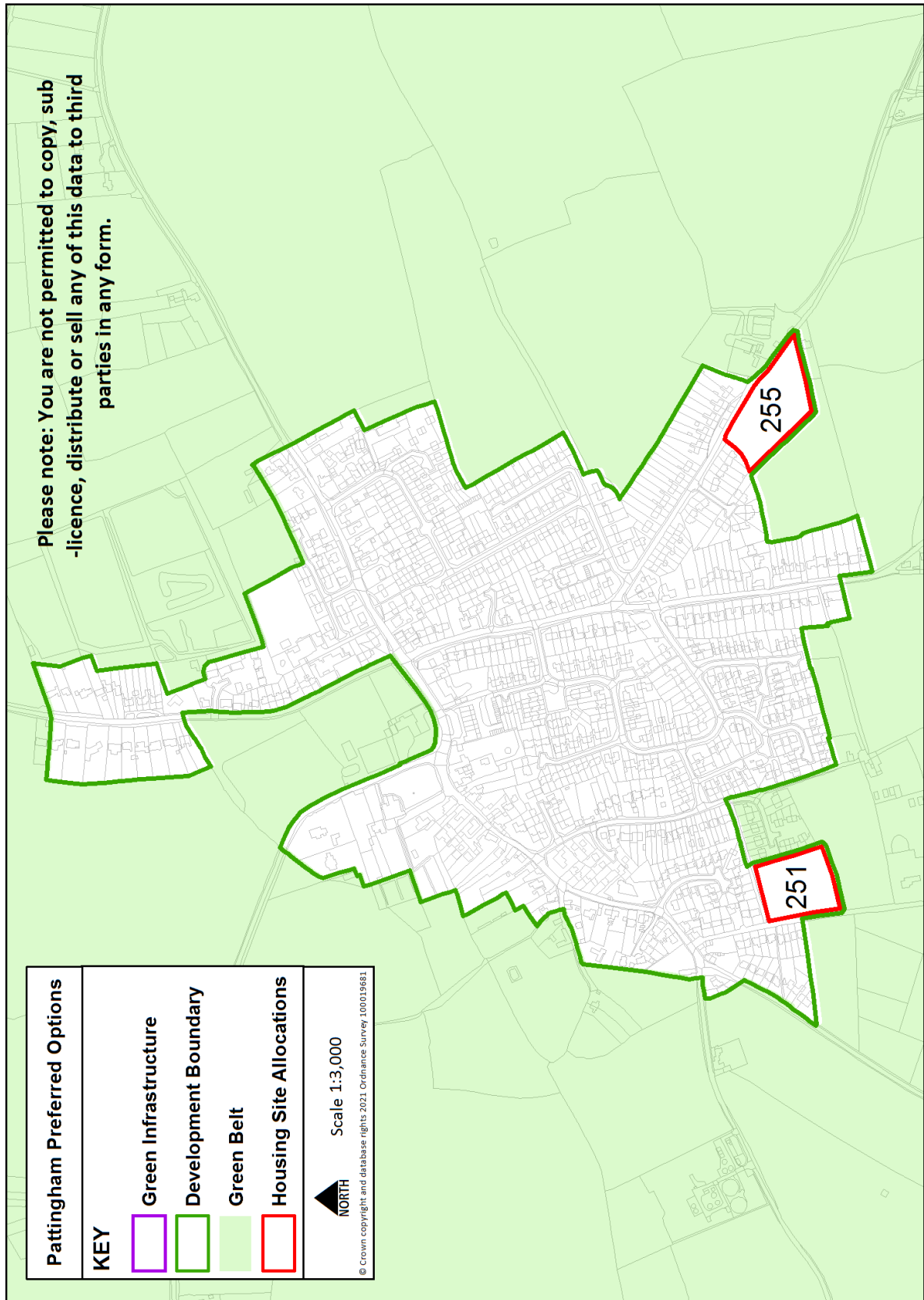
Key infrastructure requirements	<ul style="list-style-type: none"> • Provide football pitch with related amenities, (e.g. changing room and carpark) • Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.
Proposed access	Provide vehicular and pedestrian access via Malayan Way and into adjacent safeguarded land, with pedestrian access to green infrastructure to the west.

Site Reference	397	Village	Featherstone
Minimum capacity	39 dwellings	Address	Land adj. to Brinsford Lodge, Brookhouse Lane
Site area	1.6 ha	Proposed Use	Housing

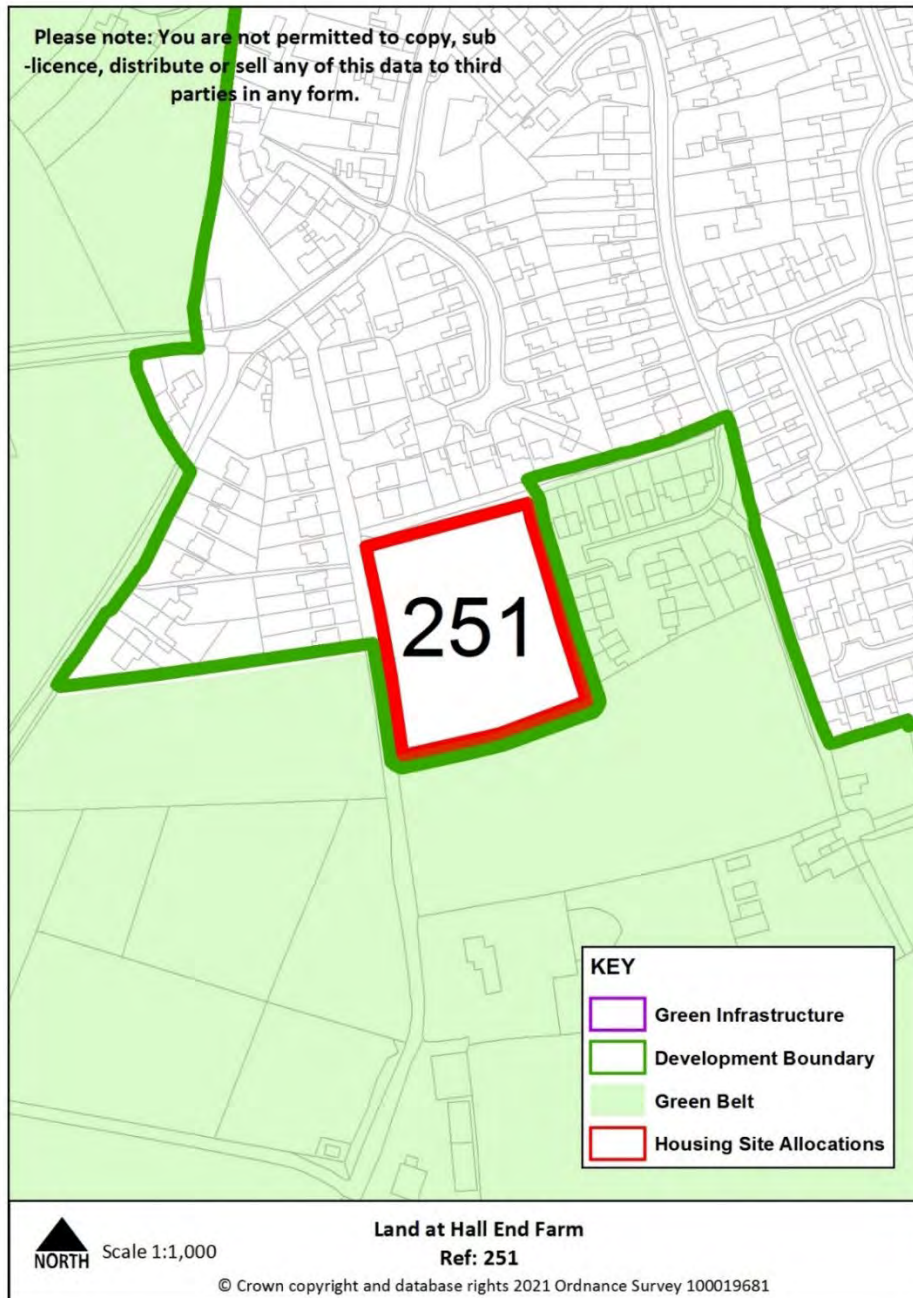


Key infrastructure requirements	Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.
Proposed access	Provide vehicular and pedestrian access via Malayan Way and into allocated site to the north.

Pattingham

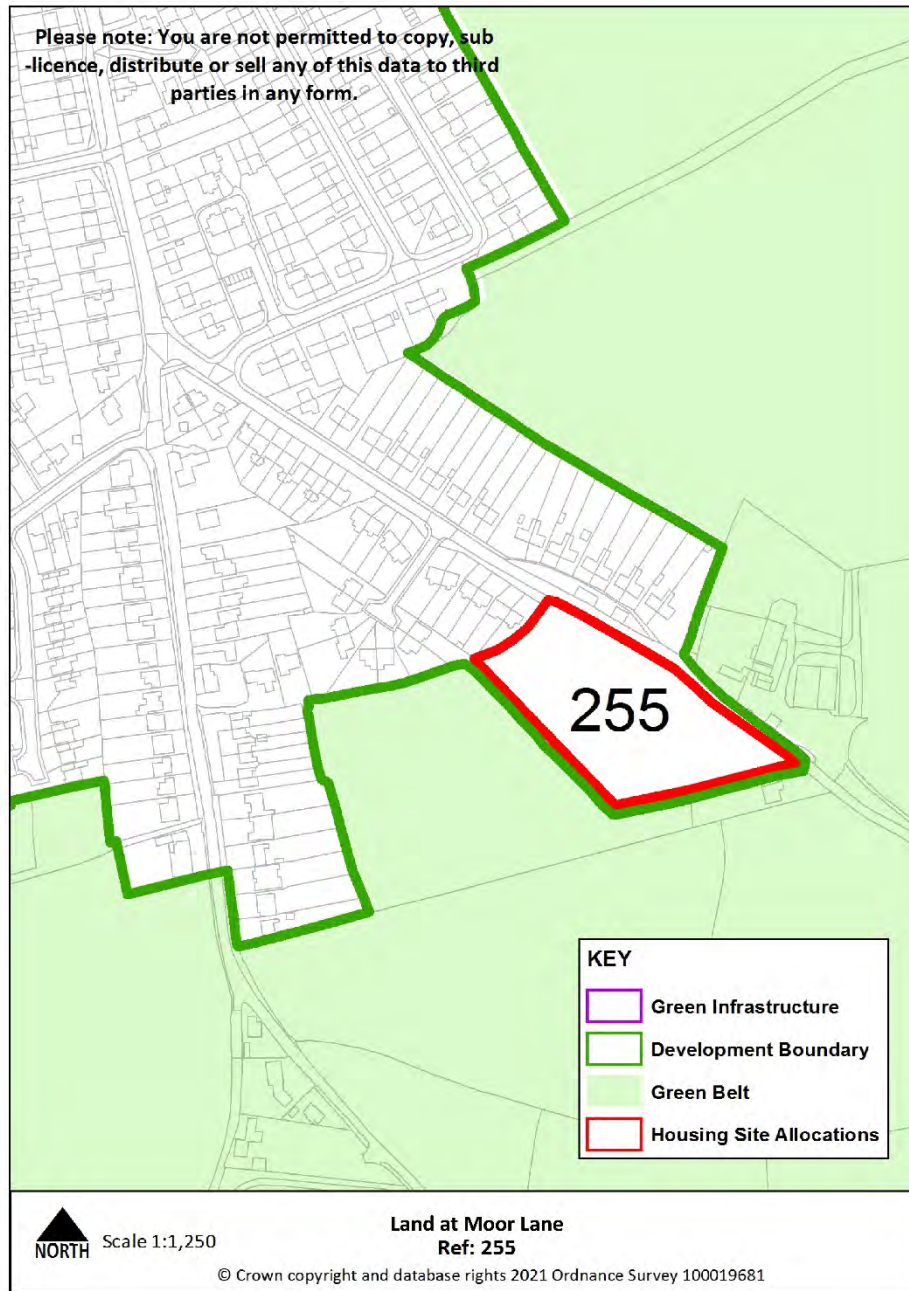


Site Reference	251	Village	Pattingham
Minimum capacity	17 dwellings	Address	Hall End Farm
Site area	0.8 ha	Proposed Use	Housing



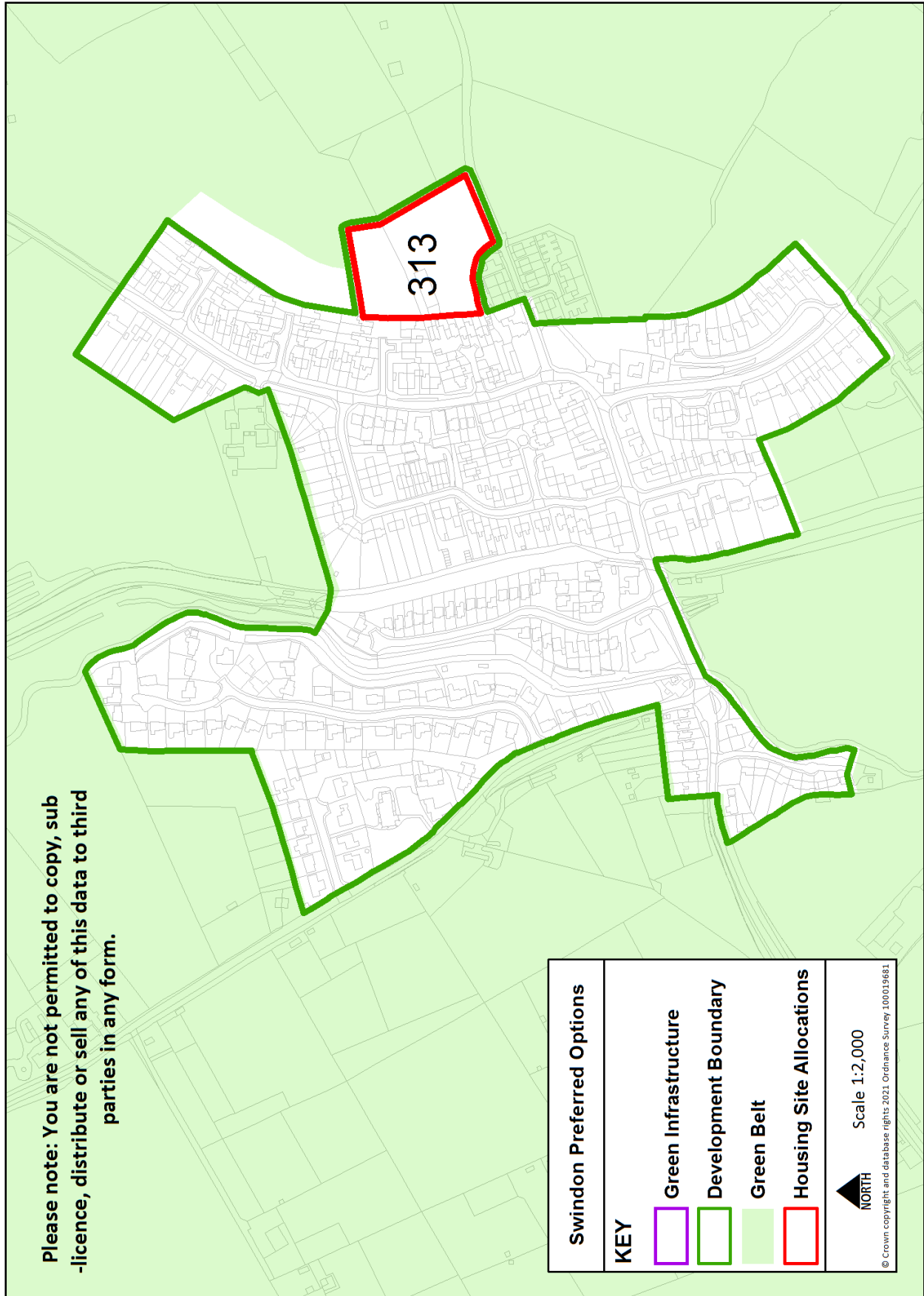
Key infrastructure requirements	Any relevant development plan policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.
Proposed access	Provide vehicular and pedestrian access to public highway via the adjacent rural exception site to the east

Site Reference	255	Village	Pattingham
Minimum capacity	22 dwellings	Address	Land at Moor Lane
Site area	1 ha	Proposed Use	Housing

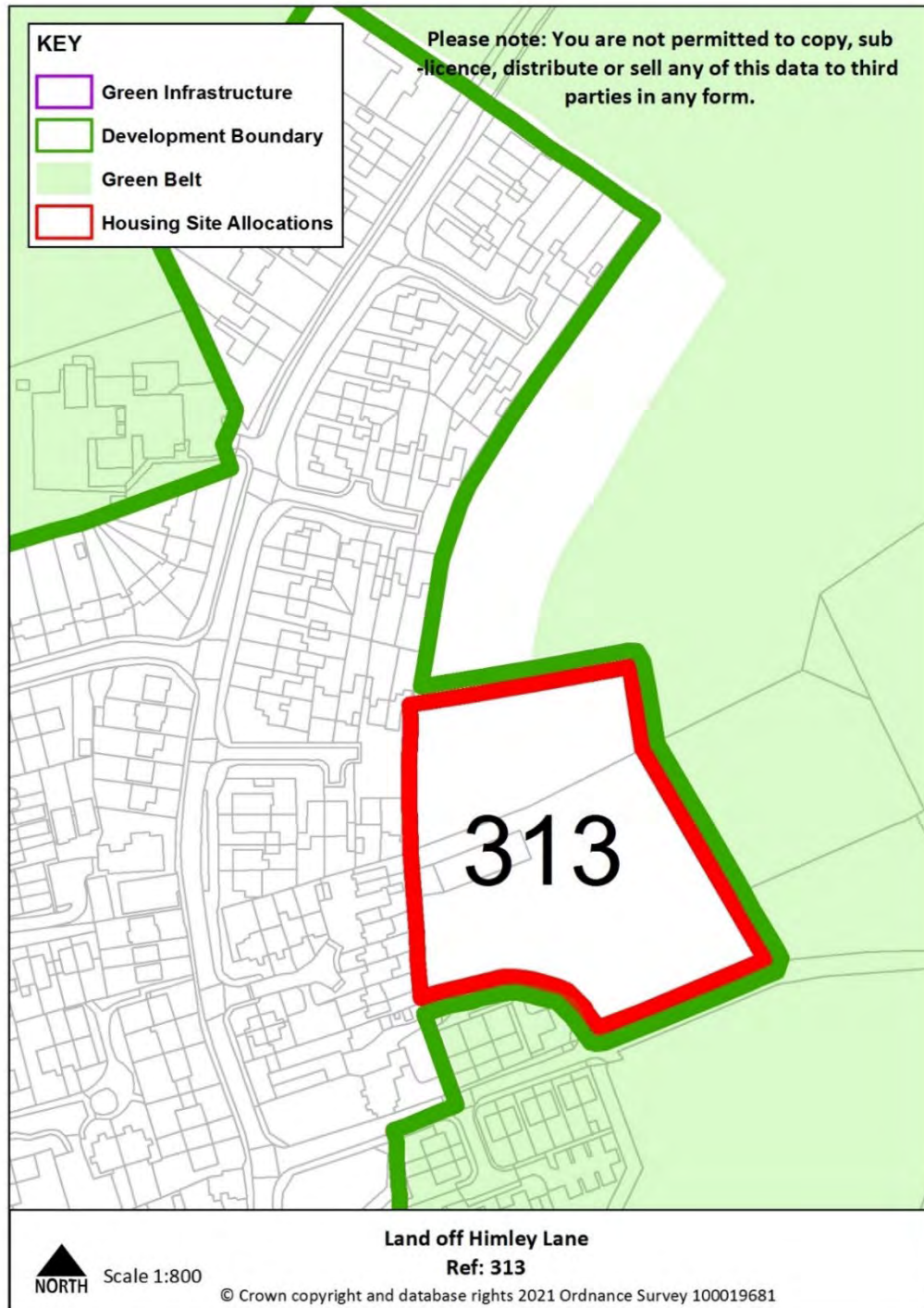


Key infrastructure requirements	Any relevant development plan policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.
Proposed access	Provide vehicular and pedestrian access via Moor Lane, including new footway fronting the site off Moor Lane.

Swindon

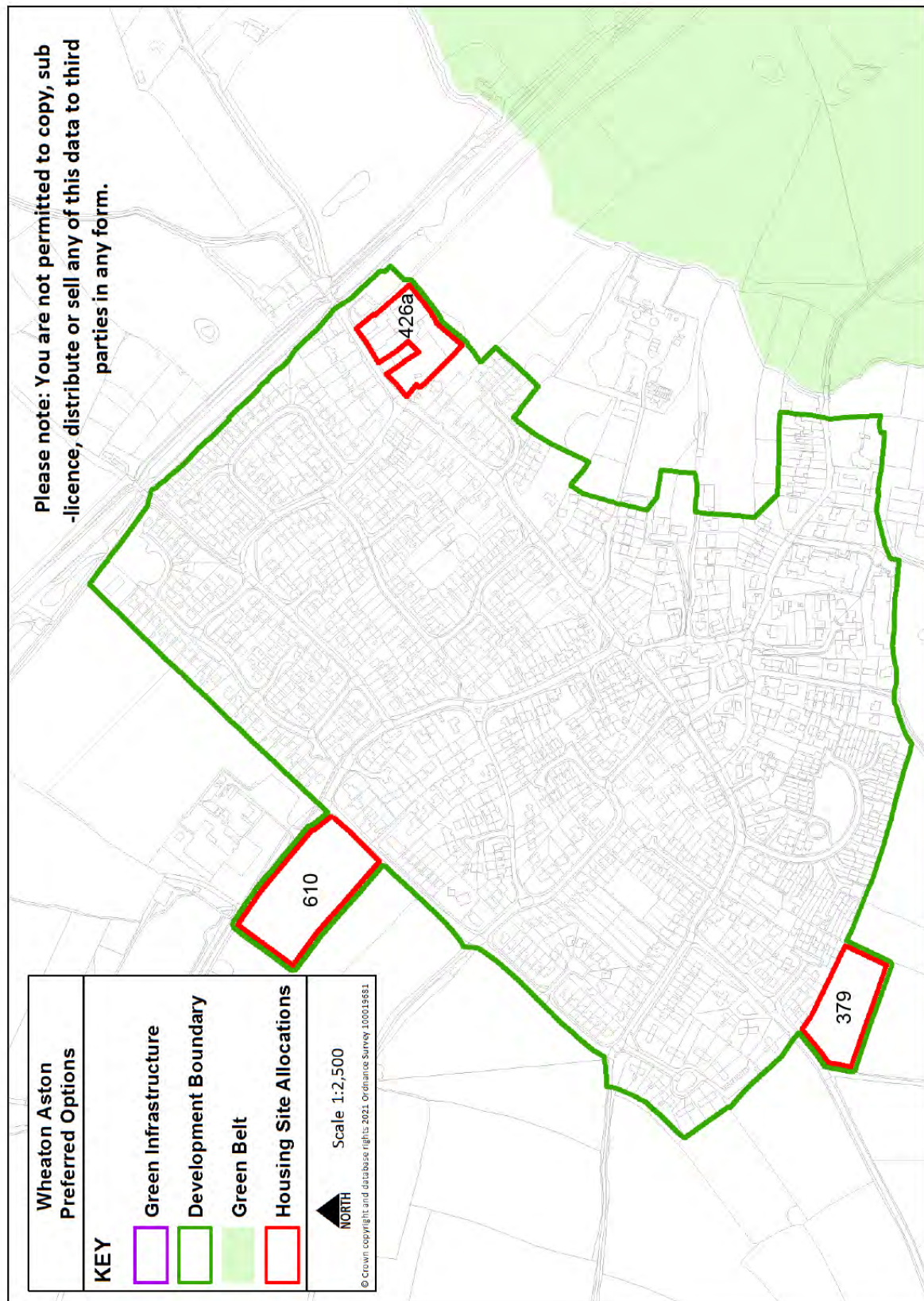


Site Reference	313	Village	Swindon
Minimum capacity	22 dwellings	Address	Land off Himley Lane
Site area	1 ha	Proposed Use	Housing

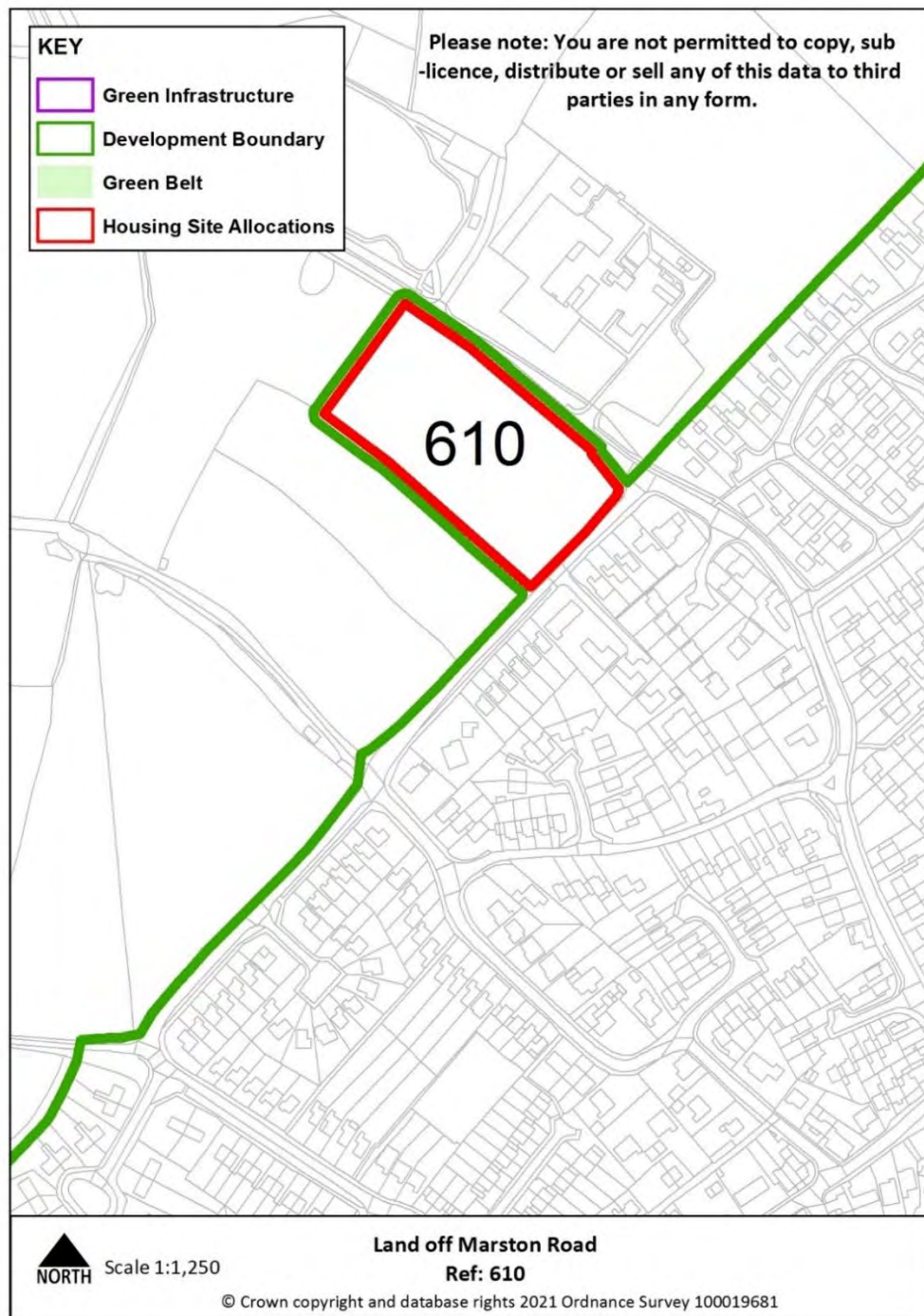


Key infrastructure requirements	Any relevant development plan policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.
Proposed access	Provide vehicular and pedestrian access via Himley Lane, including footway link to wider village.

Wheaton Aston

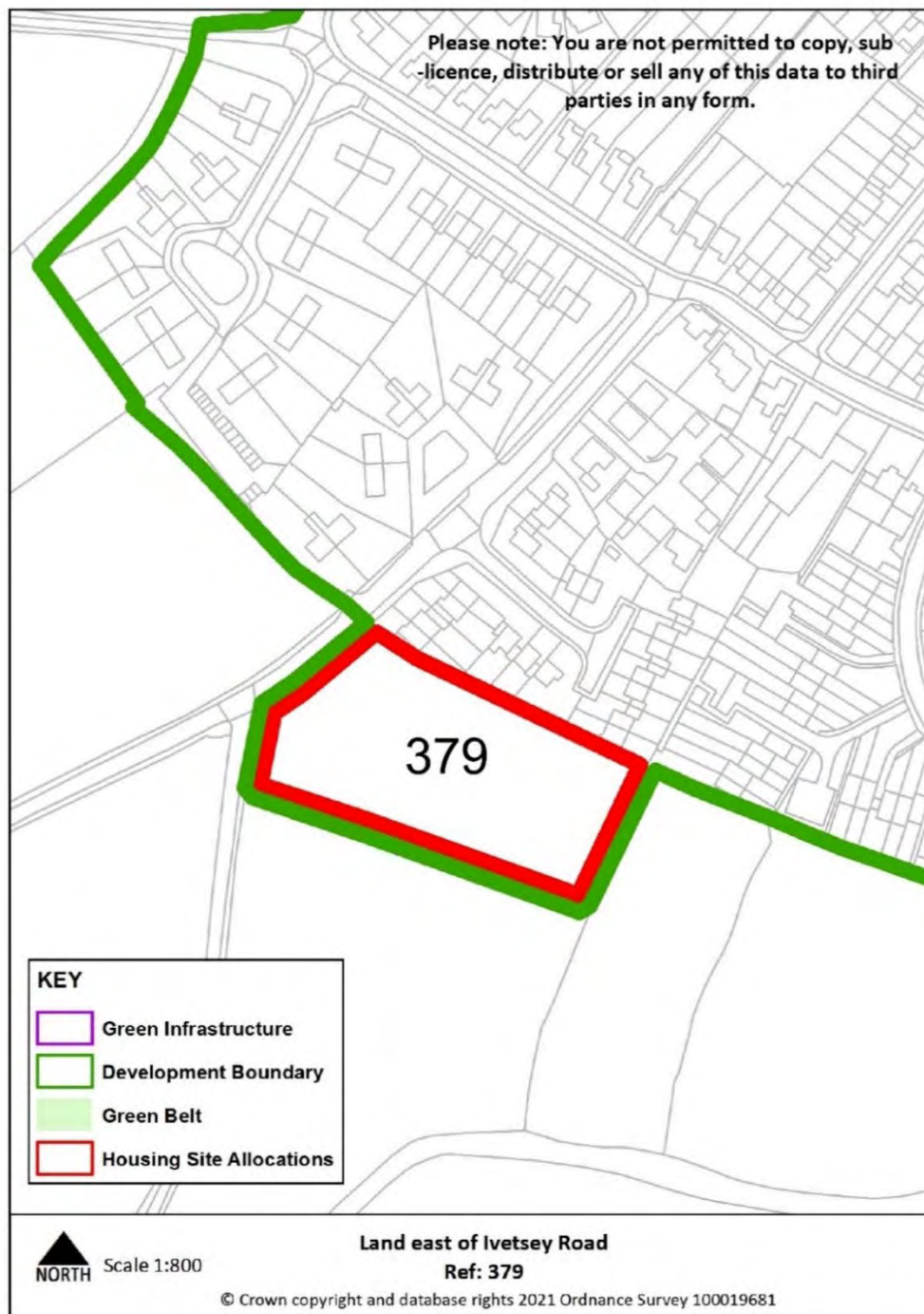


Site reference	610	Village	Wheaton Aston
Minimum capacity	22 dwellings	Address	Land off Marston Road/Fenton House Lane
Site area	1 ha	Proposed use	Housing



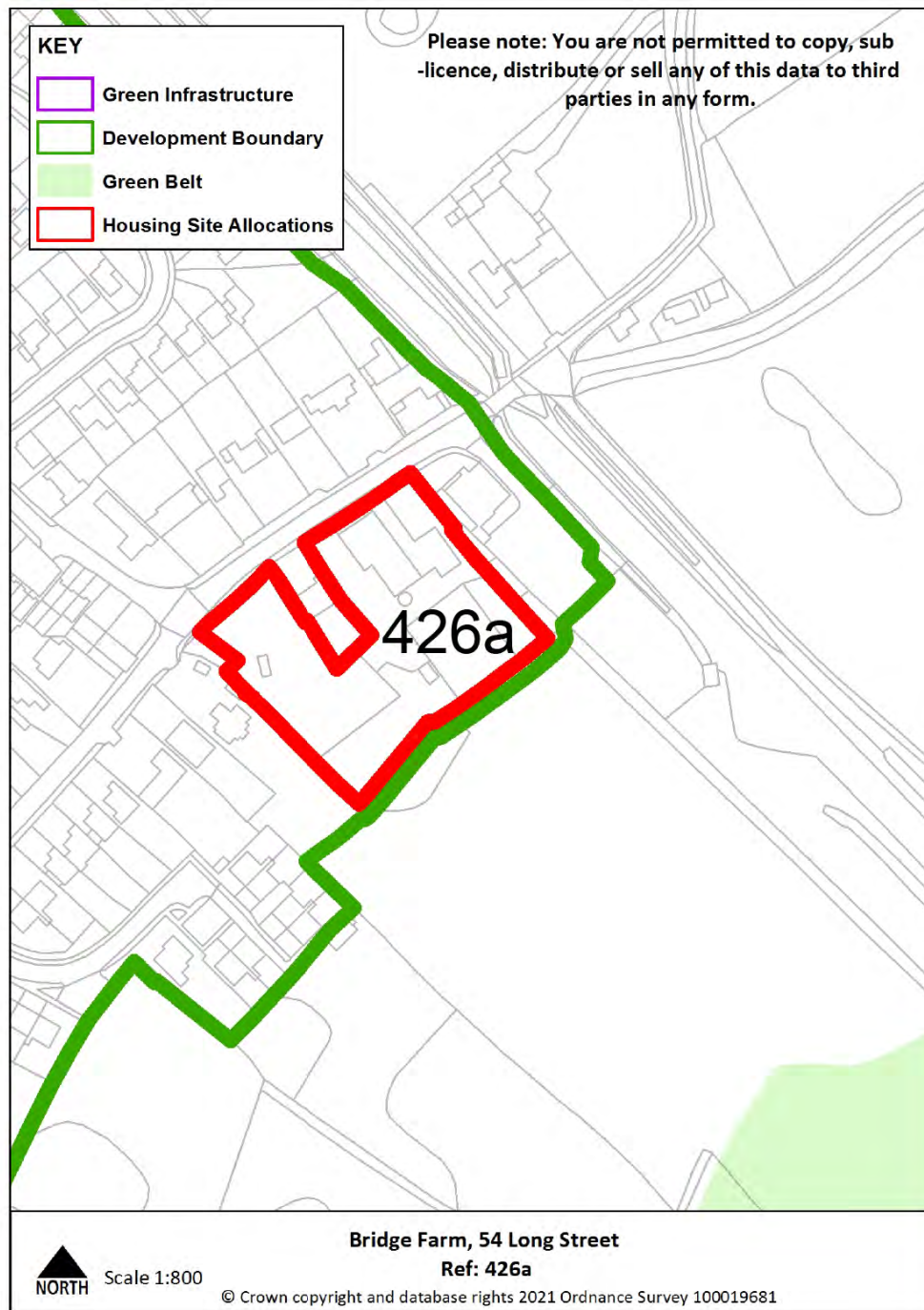
Key infrastructure requirements	Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.
Proposed access	Provide vehicular and pedestrian access via Fenton House Lane/Marston Road

Site reference	379	Village	Wheaton Aston
Minimum capacity	18 dwellings	Address	Land off Ivetsey Road
Site area	0.8 ha	Proposed use	Housing



Key infrastructure requirements	Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.
Proposed access	Provide vehicular and pedestrian access via Ivetsey Road, including extension of existing footway.

Site reference	426a	Village	Wheaton Aston
Minimum capacity	15 dwellings	Address	Bridge Farm: 54 Long Street
Site area	0.6 ha	Proposed use	Housing



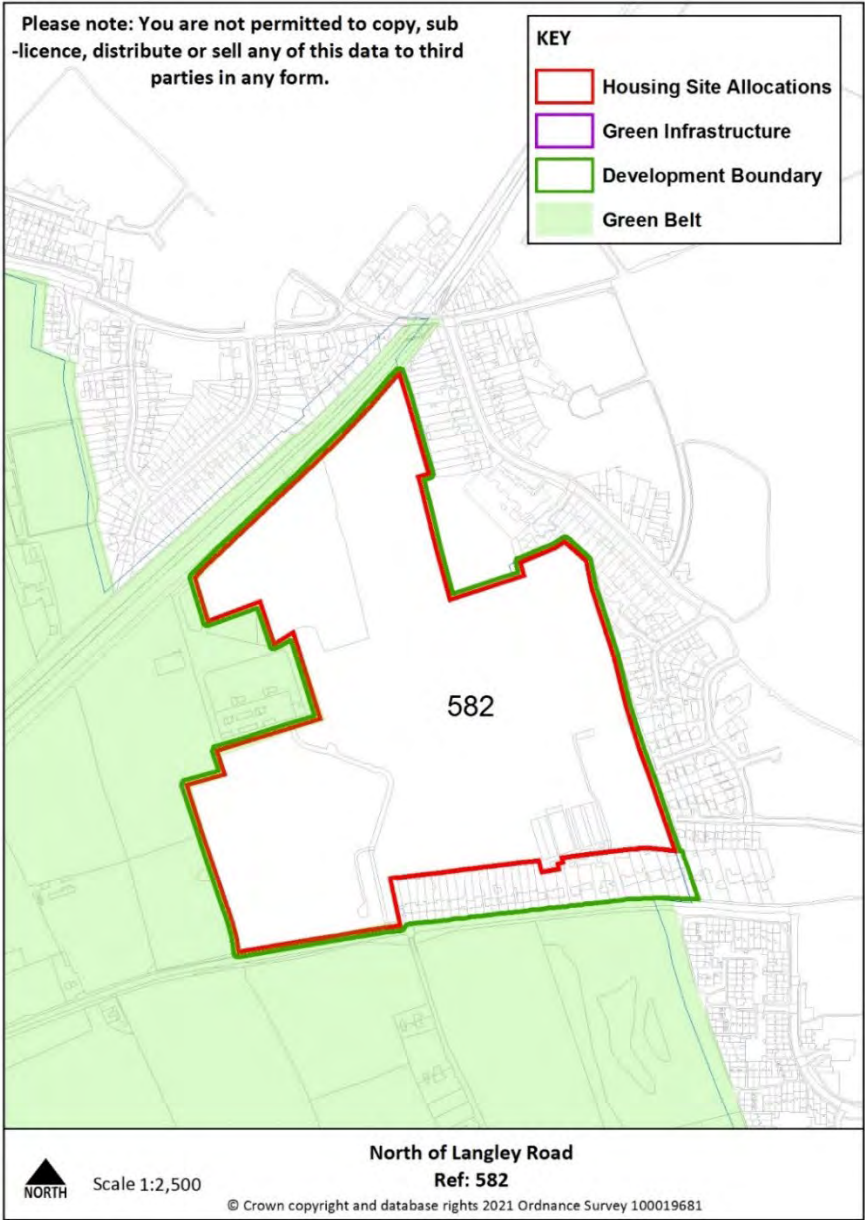
Key infrastructure requirements	Any relevant development plan policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.
Proposed access	Provide vehicular and pedestrian access via Long Street.

Urban Extensions to Neighbouring Towns and Cities

South of Stafford

Site reference	036c	Village	South of Stafford
Minimum capacity	168 dwellings	Address	Land at Weeping Cross (adjoining Stafford Borough boundary)
Site area	8 ha	Proposed use	Housing
<div> <p>Please note: You are not permitted to copy, sub-licence, distribute or sell any of this data to third parties in any form.</p> <p>KEY</p> <ul style="list-style-type: none"> Green Infrastructure Development Boundary Green Belt Housing Site Allocations <p>036c</p> <p>Land at Weeping Cross Ref: 036c</p> <p>Scale 1:1,500</p> <p>© Crown copyright and database rights 2021 Ordnance Survey 100019681</p> </div>			
Site infrastructure requirements	Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.		
Proposed access	Provide vehicular and pedestrian access via Cannock Road (A34).		

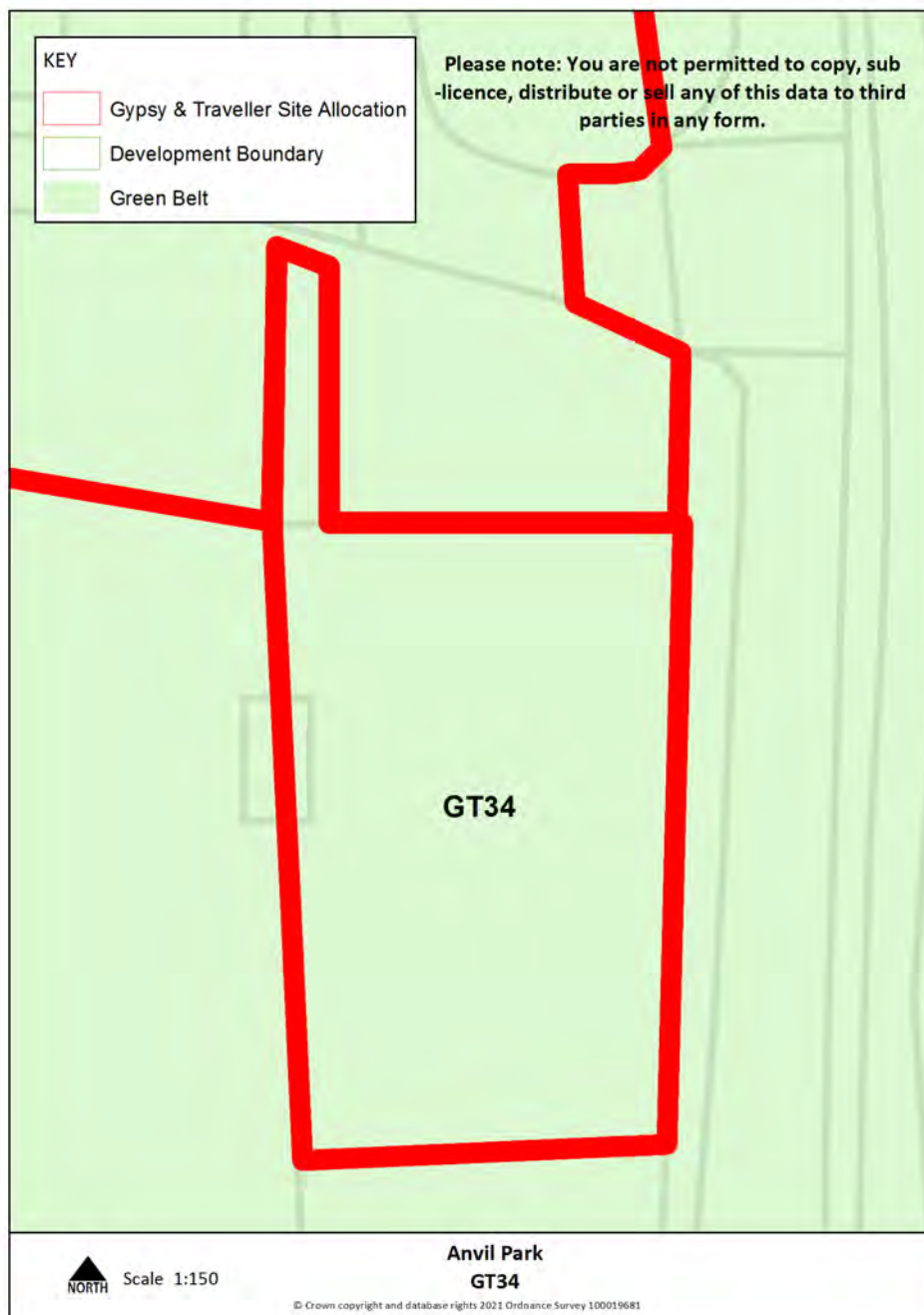
West of Wolverhampton

Site reference	582	Village	West of Wolverhampton
Minimum capacity	390 dwellings	Address	North of Langley Road (adjoining City of Wolverhampton boundary)
Site size	18.6 ha	Proposed use	Housing
<div data-bbox="371 443 1240 1659"> <p>Please note: You are not permitted to copy, sub-licence, distribute or sell any of this data to third parties in any form.</p>  <p>KEY</p> <ul style="list-style-type: none"> Housing Site Allocations Green Infrastructure Development Boundary Green Belt <p>582</p> <p>North of Langley Road Ref: 582</p> <p>Scale 1:2,500 © Crown copyright and database rights 2021 Ordnance Survey 100019681</p> </div>			
Site infrastructure requirements	Any other relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.		
Proposed access	Provide vehicular and pedestrian access via Langley Road and Bellencroft Gardens. Explore potential for direct pedestrian links north to Castlecroft Road and onto adjacent railway walk.		

Appendix D

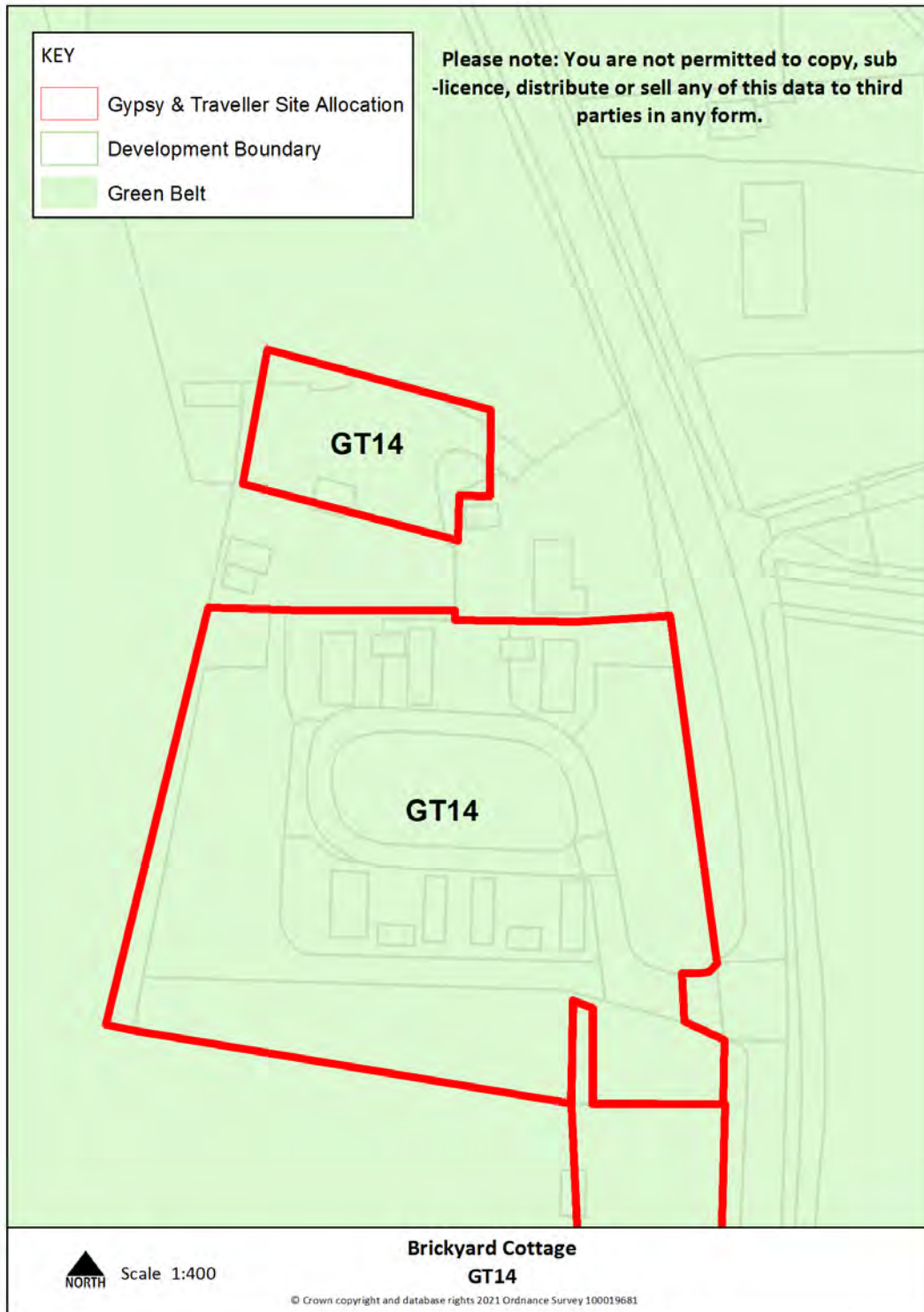
Gypsy and Traveller allocation maps and proformas

Site reference	GT34	Site name	The Paddock
Number of pitches (May/June 2021)	2 authorised	Address	Anvil Park (South of Brickyard Cottage), WV11 2RD
Proposed allocation	1 additional pitch within site boundary	Pitch need (2021-2025)	1
Site area (m2)	1,065	Proposed use	Gypsy and traveller site



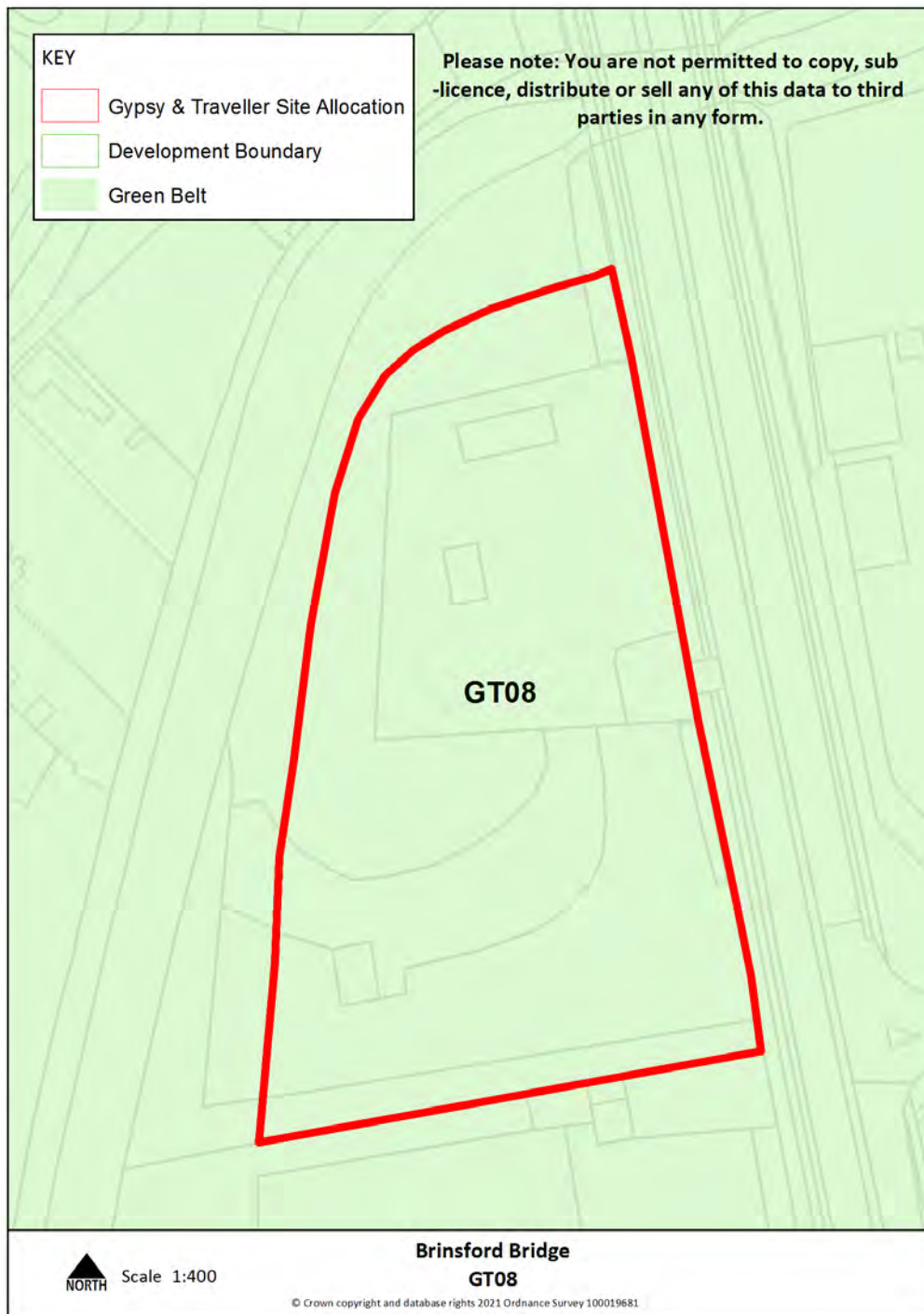
Proposed access	Provide vehicular and pedestrian access via Bursnips Road through Brickyard Cottage.
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Site reference	GT14	Site name	Brickyard Cottage
No. authorised pitches (May/June 2021)	10	Address	Land at Bursnips Road, Essington
Proposed allocation	2 additional pitch within site boundary	Pitch need (2021-2025)	2
Site area (m2)	8530	Proposed use	Gypsy and traveller site



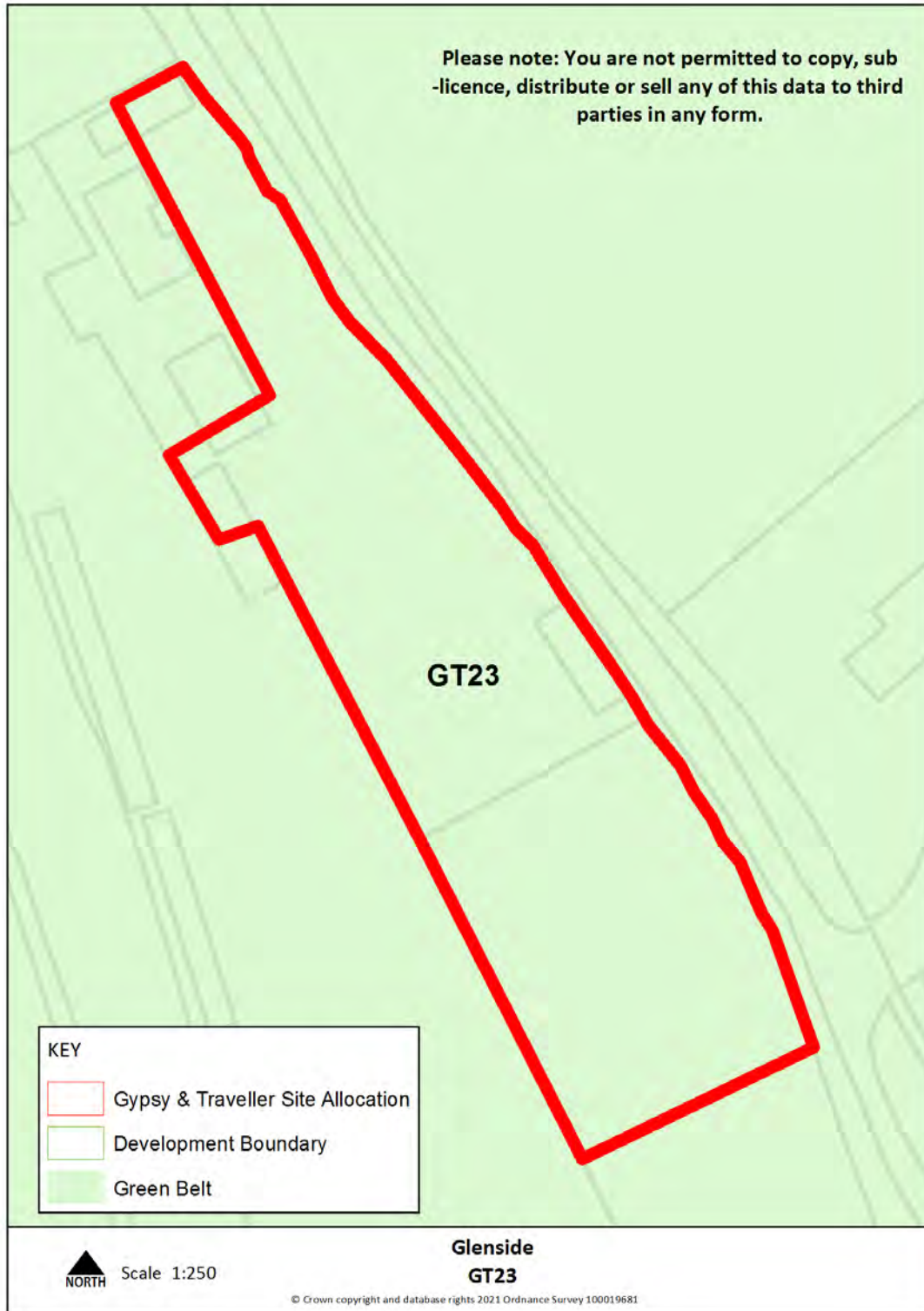
Proposed access	Provide vehicular and pedestrian access via Bursnips Road through Brickyard Cottage.
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Site reference	GT08	Site name	Brinsford Bridge
No. authorised pitches (May/June 2021)	2	Address	Stafford Road, Coven Heath
Proposed allocation	7 pitches (6 pitches on a site extension and 1 unauthorised pitch to permanent)	Pitch need (2021-2025)	7
Site area (m2)	8,695 (authorised), 2,870 (unauthorised)	Proposed use	Gypsy and traveller sites



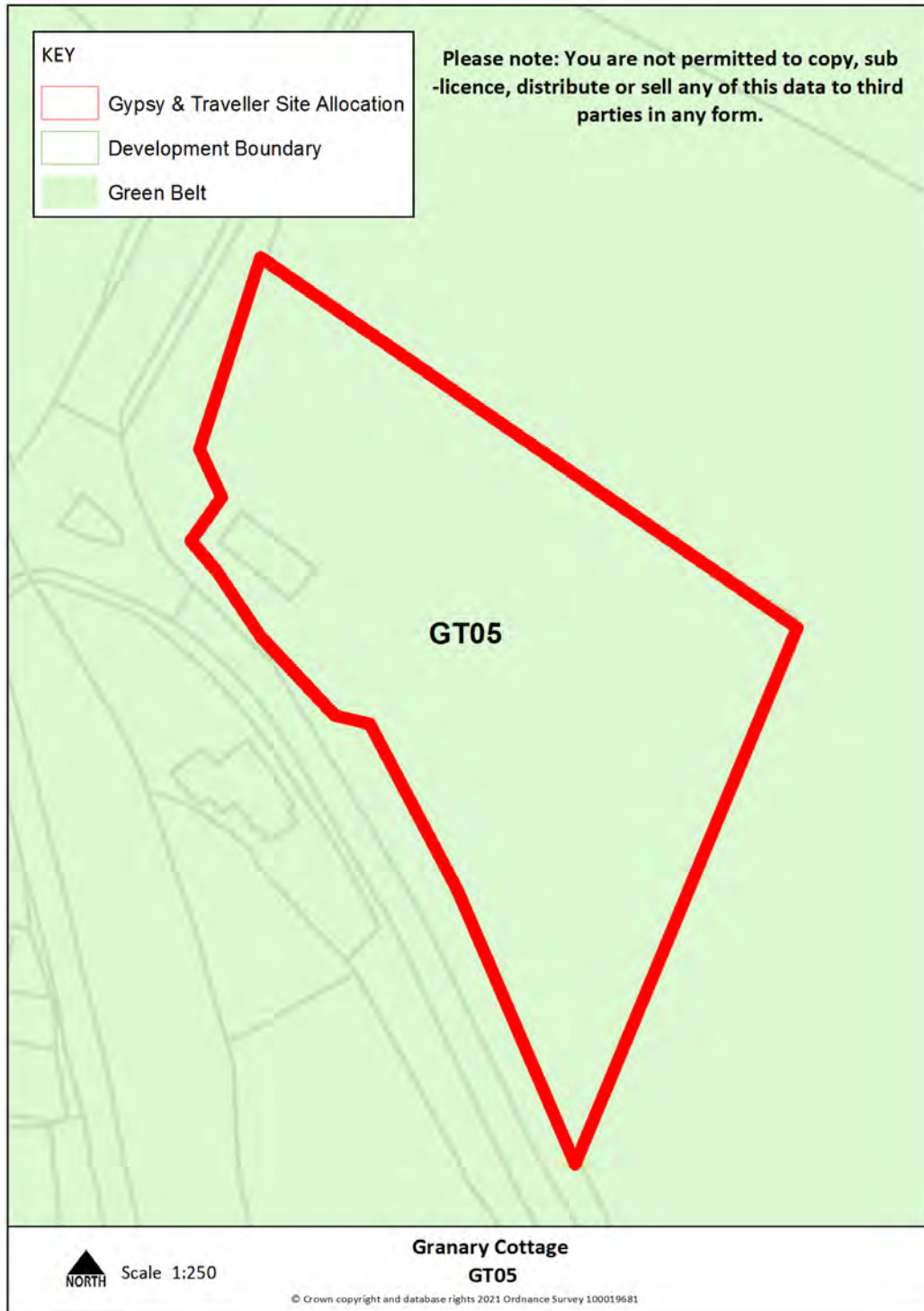
Proposed access	Provide vehicular and pedestrian access via Stafford Road
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Site reference	GT23	Site name	Glenside
No. authorised pitches (May/June 2021)	2	Address	Dark Lane, Slade Heath
Proposed allocation	1 unauthorised pitch to permanent	Pitch need (2021-2025)	1
Site area (m2)	2,725	Proposed use	Gypsy and traveller site



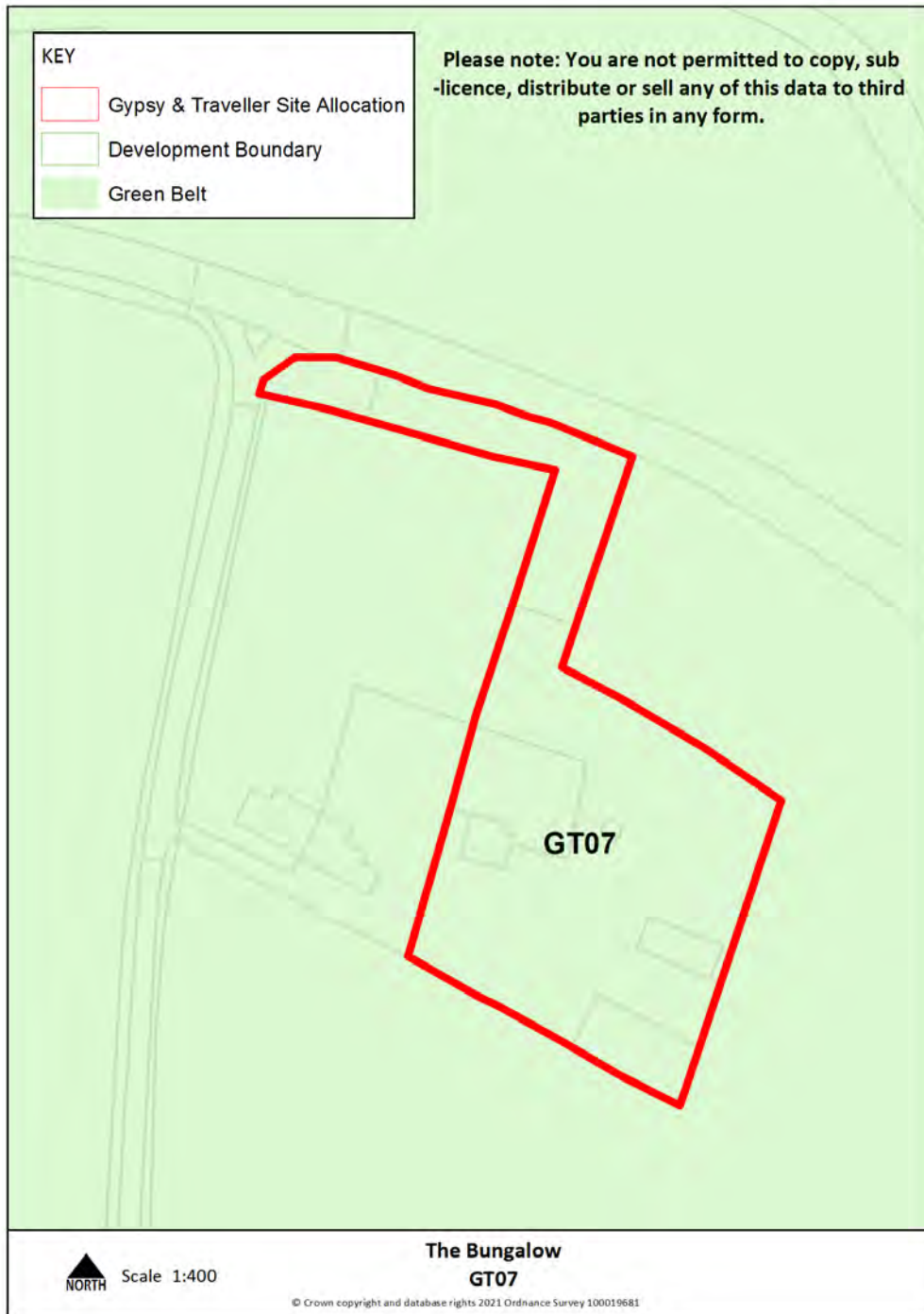
Proposed access	Provide vehicular and pedestrian access via Dark Lane.
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Site reference	GT05	Site name	Granary Cottage
No. authorised pitches (May/June 2021)	1	Address	Dark Lane, Slade Heath
Proposed allocation	1 unauthorised pitch to permanent	Pitch need (2021-2025)	1
Site area (m2)	2785	Proposed use	Gypsy and traveller site



Proposed access	Provide vehicular and pedestrian access via Stafford Road
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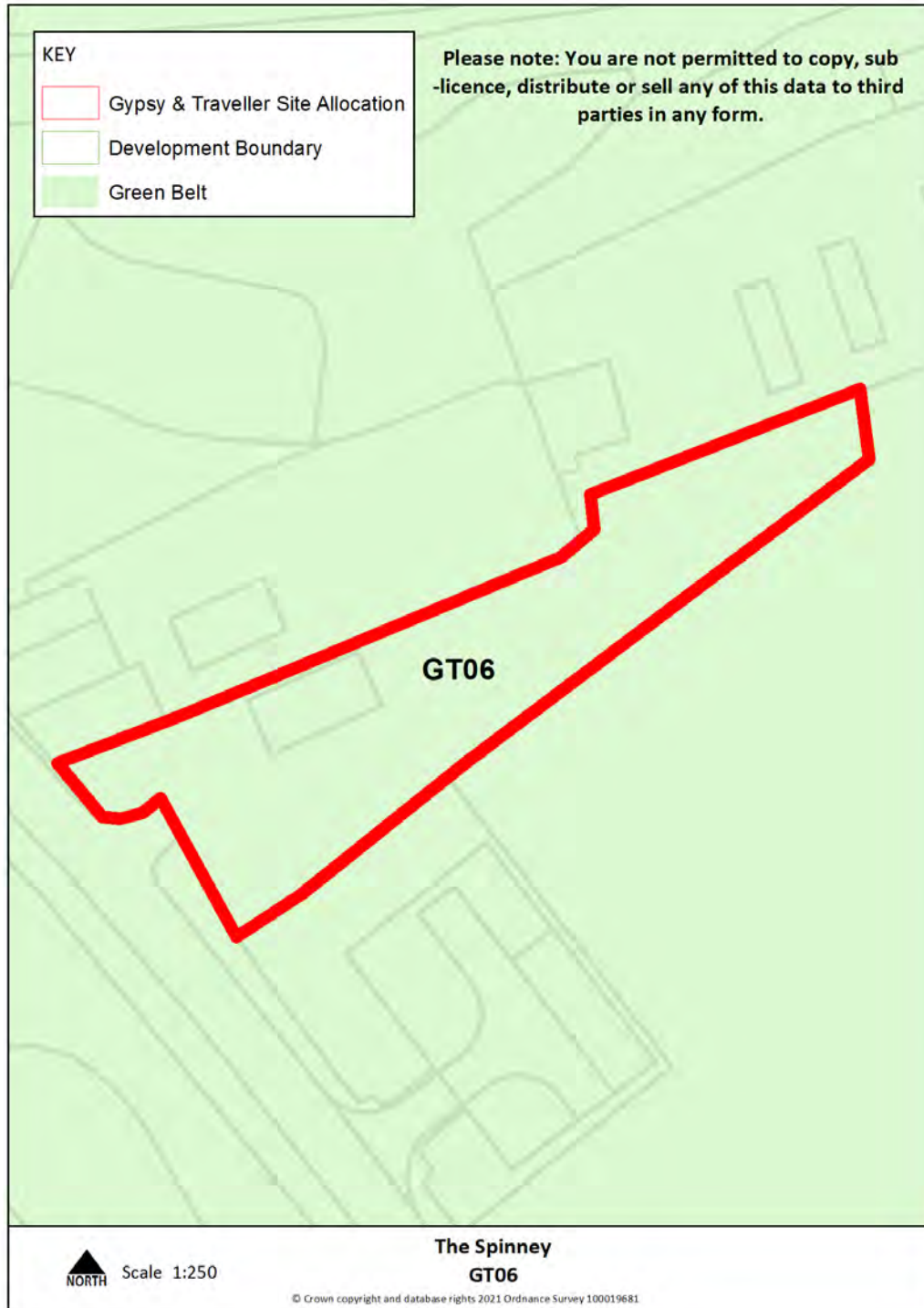
Site reference	GT07	Site name	The Bungalow
No. authorised pitches (May/June 2021)	6	Address	Brewood Road, Rock Bank, Coven
Proposed allocation	3 additional pitches within site boundary. NB: 2 of these pitches have permission but are unimplemented	Pitch need (2021-2025)	5
Site area (m2)	3895	Proposed use	Gypsy and traveller sites



Proposed access

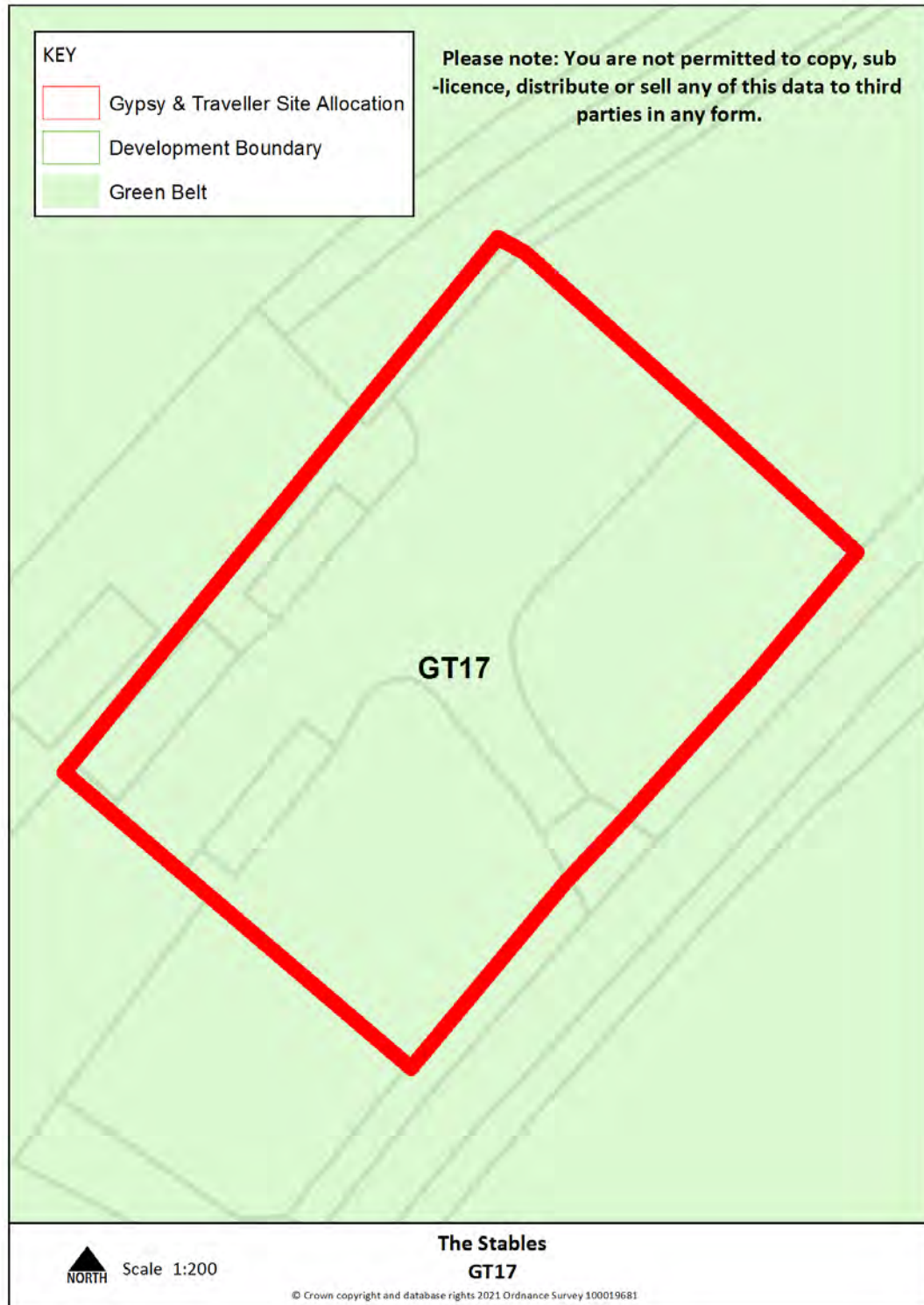
Provide vehicular and pedestrian access via Brewood Road.

Site reference	GT06	Site name	The Spinney
No. authorised pitches (May/June 2021)	1	Address	Old Stafford Road, Slade Heath
Proposed allocation	1 unauthorised to permanent and 1 additional pitch within site boundary	Pitch need (2021-2025)	2
Site area (m2)	1365	Proposed use	Gypsy and traveller site



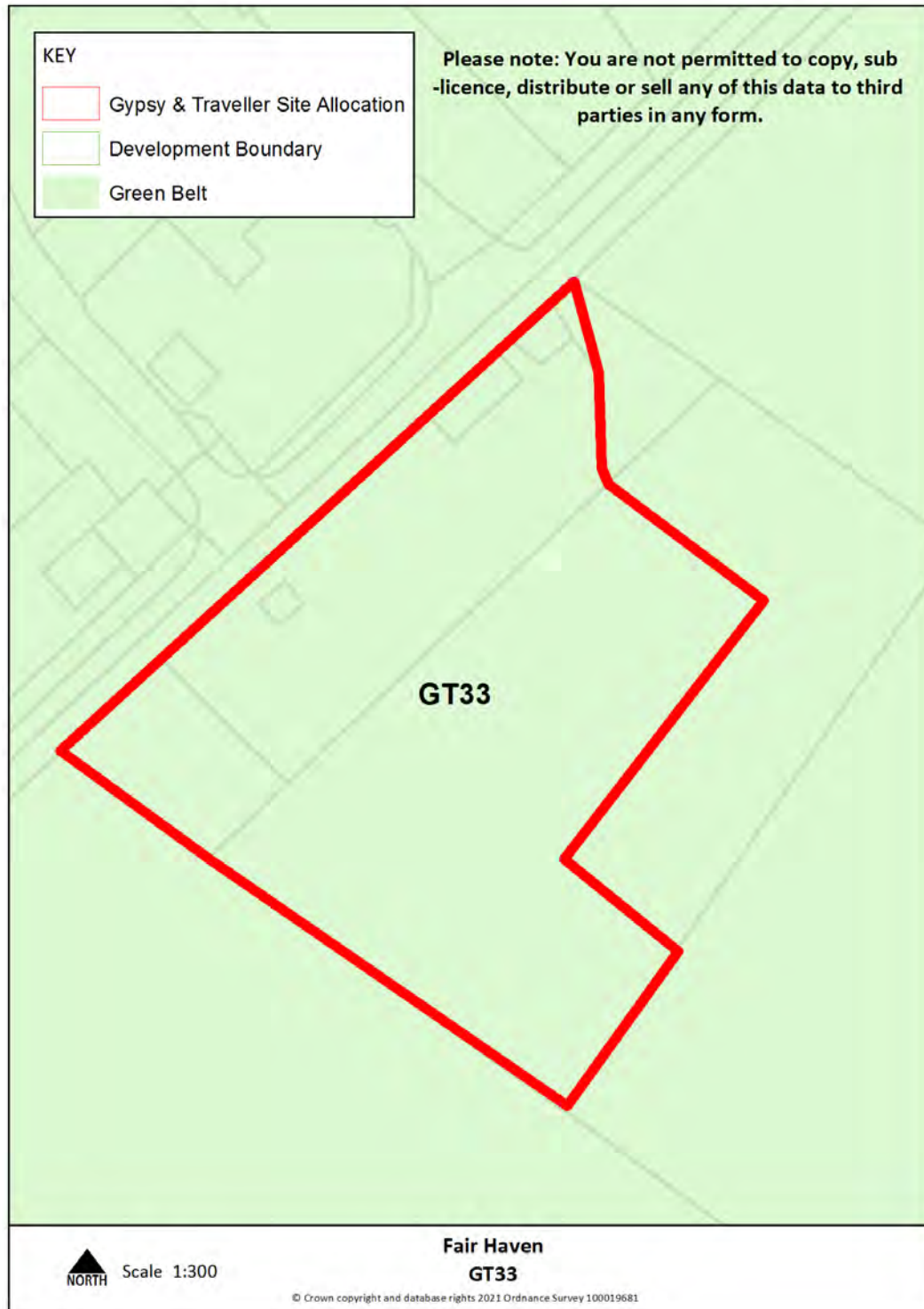
Proposed access	Provide vehicular and pedestrian access via Old Stafford Road.
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Site reference	GT17	Site name	The Stables
No. authorised pitches (May/June 2021)	4	Address	Old Landywood Lane, Upper Landywood,
Proposed allocation	3 additional pitches within site boundary	Pitch need (2021-2025)	3
Site area (m2)	2375	Proposed use	Gypsy and traveller sites



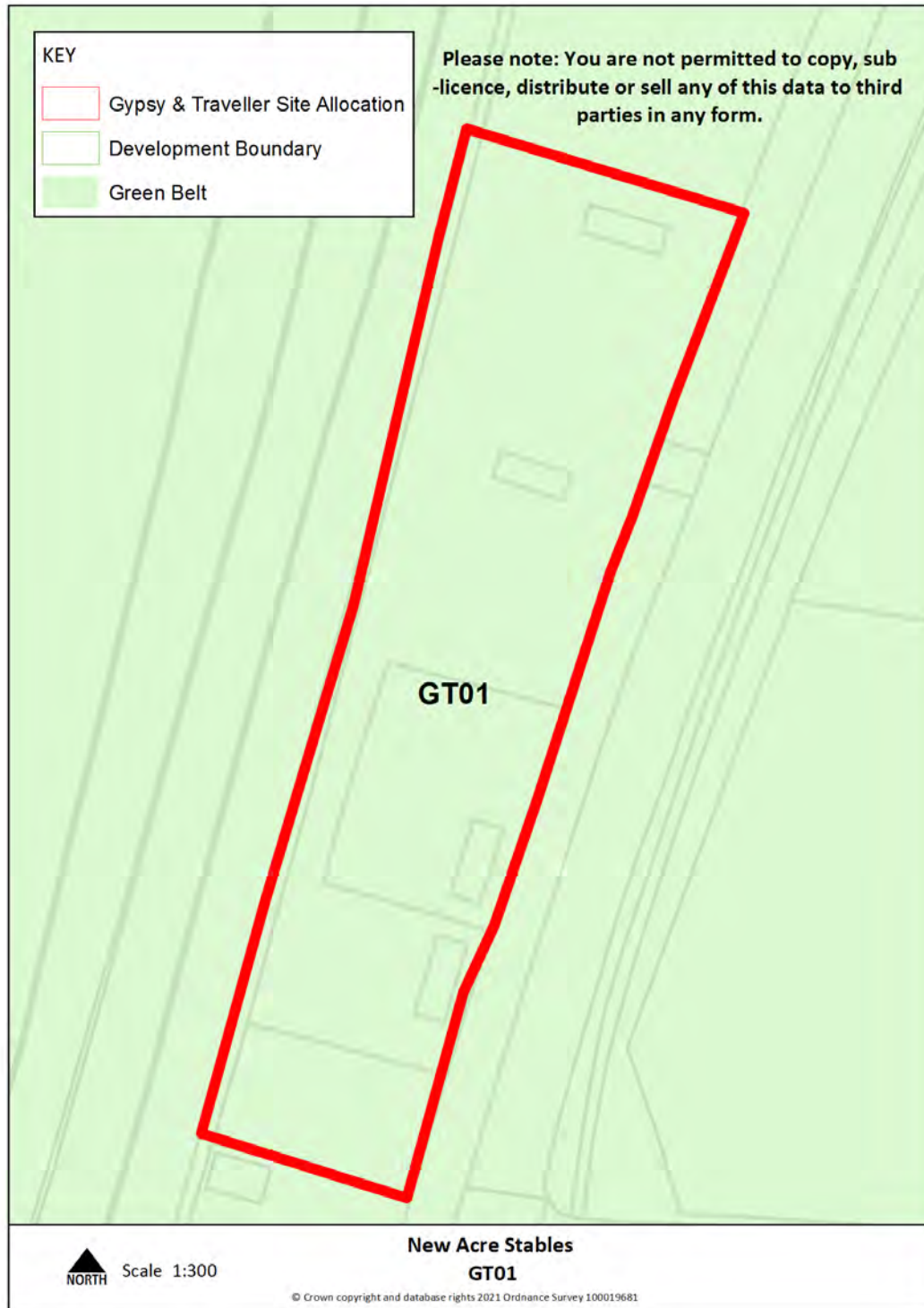
Proposed access	Provide vehicular and pedestrian access via Old Landywood Lane.
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Site reference	GT33	Site name	Fair Haven
No. authorised pitches (May/June 2021)	4 (temporary)	Address	Shaw Hall Lane, Coven Heath
Proposed allocation	4 temporary pitches to permanent	Pitch need (2021-2025)	4
Site area (m2)	1,800	Proposed use	Gypsy and traveller sites



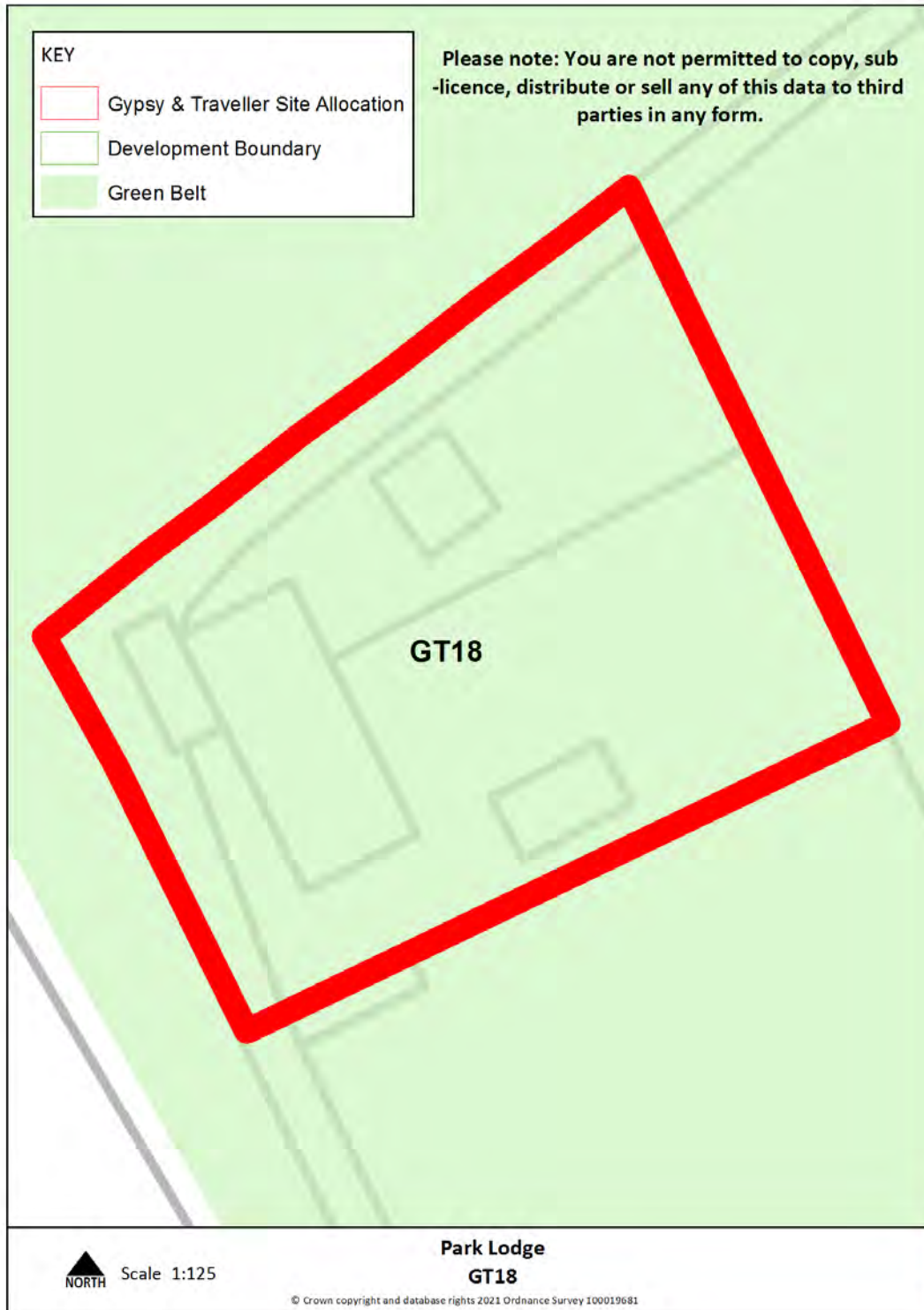
Proposed access	Provide vehicular and pedestrian access via Shaw Hall Lane.
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Site reference	GT01	Site name	New Acre Stables
No. authorised pitches (May/June 2021)	0	Address	Wolverhampton Road, Penkridge
Proposed allocation	4 unauthorised pitches to permanent	Pitch need (2021-2025)	4
Site area (m2)	8280	Proposed use	Gypsy and traveller sites



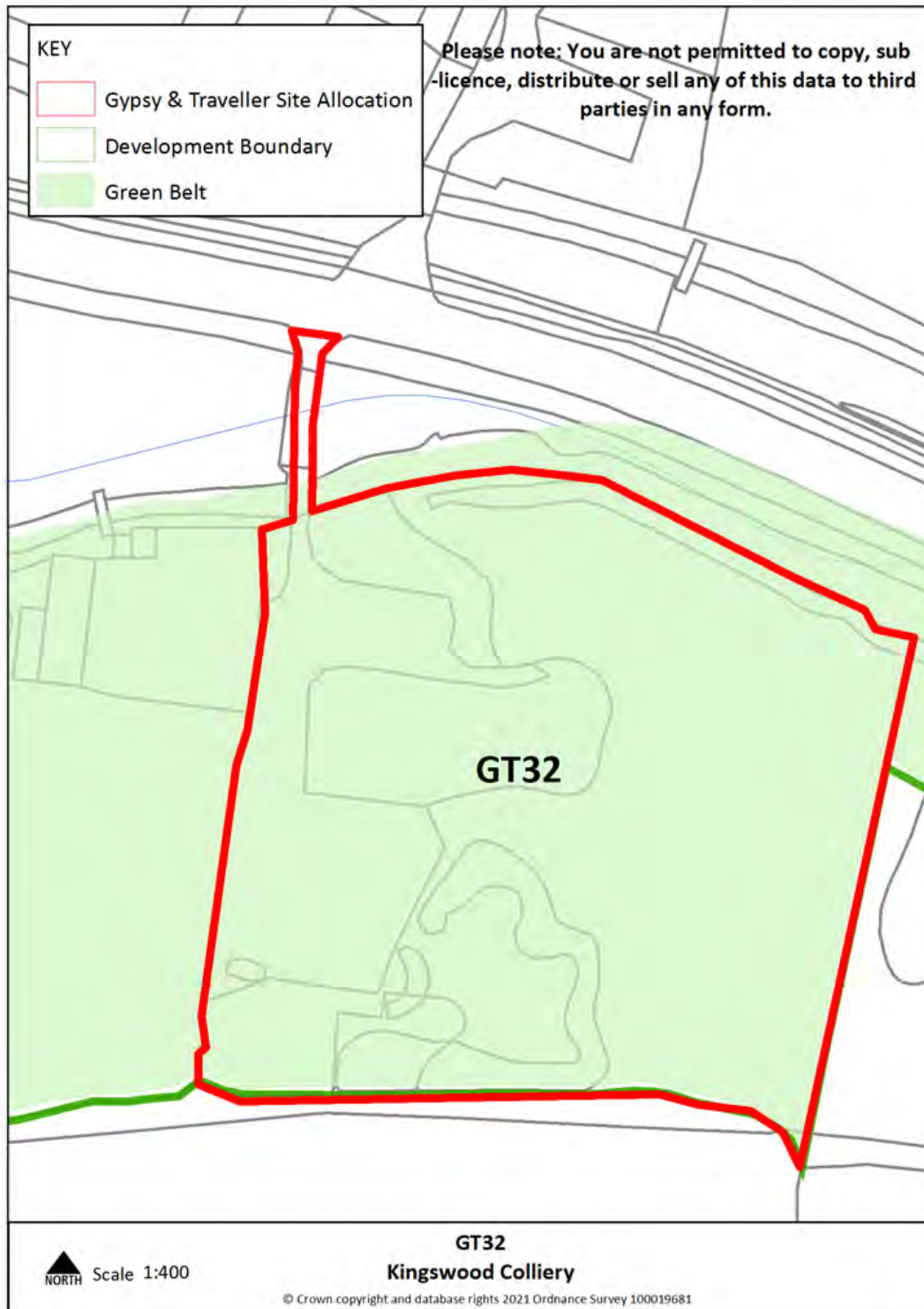
Proposed access	Provide vehicular and pedestrian access via Wolverhampton Road.
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Site reference	GT18	Site name	Park Lodge
No. authorised pitches (May/June 2021)	0	Address	Pool House Road, Wombourne
Proposed allocation	1 unauthorised pitch to permanent	Pitch need (2021-2025)	1
Site area (m2)	875	Proposed use	Gypsy and Traveller Site



Proposed access	Provide vehicular and pedestrian access via Pool House Road.
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Site reference	GT32	Site name	Kingswood Colliery
No. authorised pitches (May/June 2021)	14	Address	Watling Street, Great Wyrley
Proposed allocation	8 additional pitches within site boundary	Pitch need (2021-2025)	8
Site area (m2)	10,400	Proposed use	Gypsy and traveller sites



Proposed access	Provide vehicular and pedestrian access via Watling Street.
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Site reference	GT35	Site name	Rear of 122 Streets Lane
No. authorised pitches (May/June 2021)	0	Address	Streets Lane, Great Wyrley
Proposed allocation	4 unauthorised pitches to permanent and 1 additional pitch	Pitch need (2021-2025)	5
Site area (m2)	3790	Proposed use	Gypsy and traveller sites



Proposed access	Provide vehicular and pedestrian access via Streets Lane
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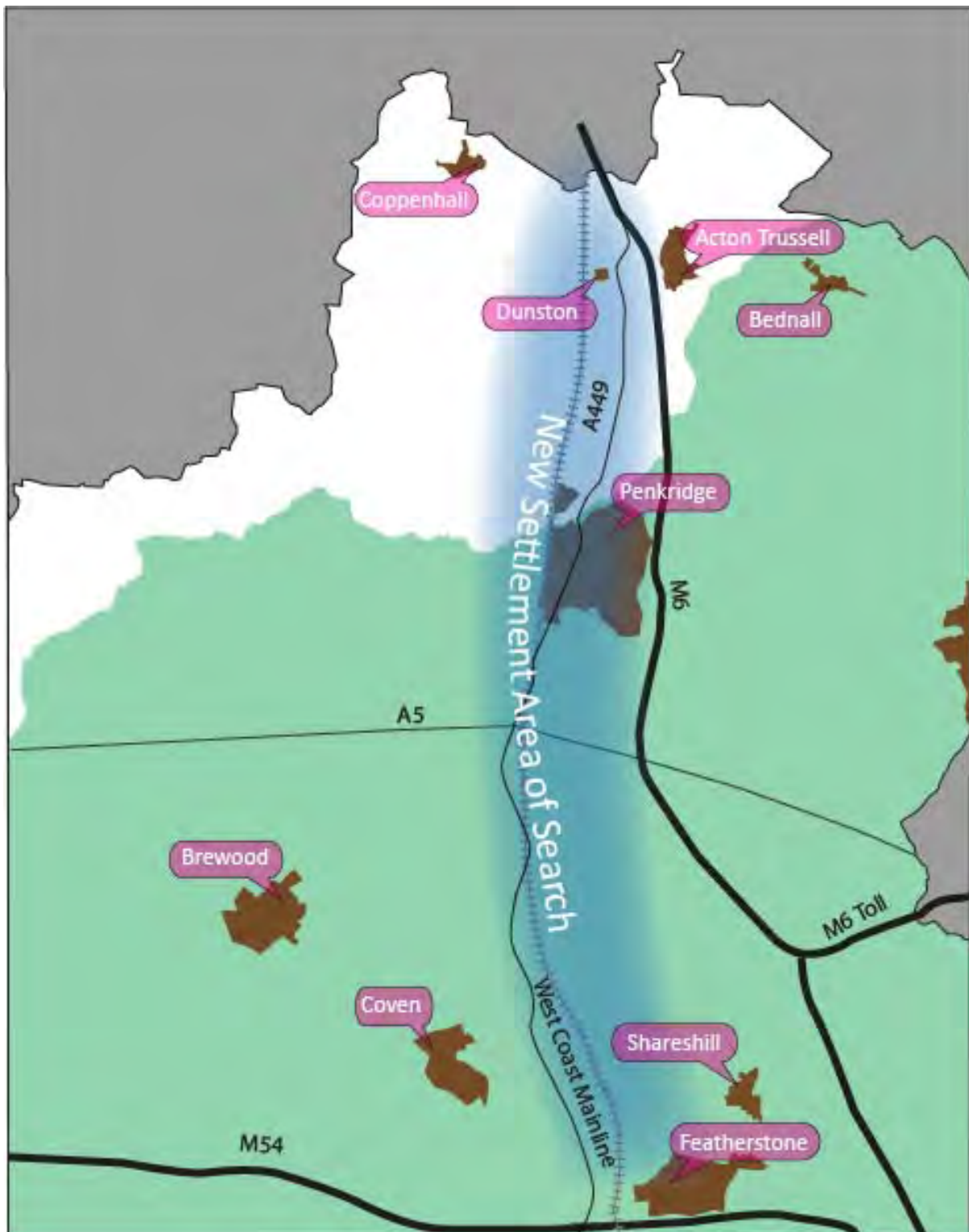
Appendix E

Employment allocation maps and proformas

Site reference	E33	Address	West Midlands Interchange
Location	Gailey		
Site size	297ha (232.5ha of land removed from Green Belt)	Proposed use	B8 Employment
<p>Please note: You are not permitted to copy, sub-licence, distribute or sell any of this data to third parties in any form.</p> <p>West Midlands Interchange</p> <p>Four Ashes</p> <p>West Midlands Interchange</p> <p>KEY</p> <ul style="list-style-type: none"> WMI Green Infrastructure WMI Boundary Development Boundary Green Belt <p>NORTH Scale 1:6,000</p> <p>© Crown copyright and database rights 2021 Ordnance Survey 100035018</p>			
Site infrastructure and access requirements	The sites infrastructure and access requirements are set out in the Development Consent Order (DCO) for the site.		

Appendix F

Area of search for potential new settlement



Appendix G

Full list of consultation questions

<p>Chapter 3</p> <p>Question 1: Do you agree that the evidence base set out in Appendix A is appropriate to inform the new Local Plan? Yes/No</p> <p>Please provide comments on the content or use of the evidence base set out in Appendix A, referencing the document you are referring to.</p> <p>Question 2: (a) Do you agree that the correct infrastructure to be delivered alongside proposed site allocations been identified in the IDP? Yes/No (b) Is there any other infrastructure not covered in this consultation document or the IDP that the Local Plan should seek to deliver? Yes/No</p> <p>Question 3: a) Have the correct vision and strategic objectives been identified? Yes/No b) Do you agree that the draft policies (Chapters 4 and 5) and the policy directions (Chapter 6) will deliver these objectives? Yes/No</p>
<p>Chapter 4</p> <p>Question 4: Do you support the policy approach in Policy DS1 – Green Belt and Policy DS2 – Open Countryside? Yes/No If no, please explain how these policies should be amended?</p> <p>Question 5: Do you support the policy approach in Policy DS3 – The Spatial Strategy to 2038? Yes/No If no, please explain how this policy should be amended?</p> <p>Question 6: Do you support the policy approach in and Policy DS4 – Longer Term Growth Aspirations for a New Settlement? Yes/No If no, please explain how this policy should be amended?</p>
<p>Chapter 5</p> <p>Question 7: a) Do you support the proposed strategic housing allocations in policies SA1-SA4? Yes/No If no, please explain your reasons for this.</p>

b) Do you agree that given the scale of the 4 sites detailed in policies SA1-SA4, these warrant their own policy to set the vision for the site, alongside a requirement for a detailed masterplan and design code? Yes/No

Question 8:

Do you support the proposed housing allocations in Policy SA5? Yes/No

Please reference the site reference number (e.g site 582) for the site you are commenting on in your response.

Question 9:

A) Do you support the proposed pitch allocations in Policy SA6? Yes/No

Please reference the site reference number (e.g SS001) for the site you are commenting on in your response.

B) Is there another option for meeting our gypsy and traveller needs, including any alternative site suggestions that could be considered? Yes/No

Please provide details, including a plan for new site suggestions

Question 10:

Do you support the proposed allocation in Policy SA7? Yes/No

Chapter 6

Question 11:

Do you agree with the proposed policy approaches set out in Chapter 6? Yes/No

If no, then please provide details setting out what changes are needed, referencing the Policy Reference number (e.g HC1 - Housing Mix).

Question 12:

a) It is proposed that the fully drafted policies in this document (Policies DS1-DS4 and SA1-SA7) are all strategic policies required by paragraph 21 of the NPPF. Do you agree these are strategic policies? Yes/No

b) Are there any other proposed policies in Chapter 6 that you consider should be identified as strategic policies? Yes/No

If yes, then please provide details including the Policy Reference (e.g HC1 – Housing Mix)

Appendix H

Glossary

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

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

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

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

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

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

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

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

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

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

Community Facilities

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

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

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

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

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

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

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

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

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

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

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

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

Development Plan Documents (DPDs) – Spatial planning documents prepared by the LPA and subject to Independent Examination. For South Staffordshire, they include the Core

Strategy, the Site Allocations Document (SAD), and the Policies Map. DPDs are required to have a Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA).

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

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

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

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

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

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

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

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

Green Belt (not to be confused with the term ‘greenfield’) – A statutory planning designation for open land around certain cities and large built-up areas, which aims to keep 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 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 (MHCLG) – 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.

Planning Practice Guidance

National online planning guidance which gives greater detail to the national planning policy framework.

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 options 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 Local Plan. Policies will identify any specific requirements for individual proposals.

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

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

Spatial Planning - Spatial planning goes beyond traditional land use planning to bring together and integrate policies for the development and use of land with other policies and programmes which influence the nature of places and how they function. That will include policies which can impact on land use, for example by influencing the demands on, or needs for, development, but which are not capable of being delivered solely or mainly through the granting or refusal of planning permission and which may be implemented by other means.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



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