

South Staffordshire Council

Local Plan Review

Spatial Housing Strategy & Infrastructure Delivery October 2019

Appendix 5 Policy and Physical Constraints Paper

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1. South Staffordshire Green Belt Study 2019

1.1 The NPPF identifies the fundamental aim of Green Belt policy as being the prevention of urban sprawl by keeping land permanently open, noting that the essential characteristics of Green Belts are their openness and permanence. On top of this, the NPPF notes five purposes which the Green Belt serves:

- To check the unrestricted sprawl of large built-up areas
- To prevent neighbouring towns merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

1.2 The NPPF establishes that, once established, Green Belts should only be altered in exceptional circumstances, which case-law¹ establishes requires consideration of the nature and extent of harm to the Green Belt. To this end, the Council has jointly commissioned a Green Belt Study with the Black Country authorities. The South Staffordshire portion of this study is the South Staffordshire Green Belt Study 2019. This examines which areas of the District perform the five purposes of the Green Belt to a greater or lesser extent, before considering the potential harm to the Green Belt of releasing areas of Green Belt for development. The findings of this study are summarised against each broad location below.

1.3 Tier 1 Settlements

Penkridge

- the Green Belt parcels surrounding the settlement range from low-moderate to high harm, although there is a large area of Open Countryside land beyond the Green Belt to the north of the settlement
- the majority of Green Belt land adjacent to the settlement is moderate-high harm, although there is a limited area of low-moderate harm adjacent to the south of the settlement and large areas of Open Countryside to the north of the settlement

Codsall/Bilbrook

- the Green Belt parcels surrounding the settlement range from moderate to high harm
- the majority of Green Belt land adjacent to the settlement is high harm, although there are significant areas of moderate-high harm to the north and west of Codsall

Cheslyn Hay/Great Wyrley

- the Green Belt parcels surrounding the settlement range from low-moderate to very high harm
- the majority of Green Belt land adjacent to the settlement is high harm, although there are significant areas of low-moderate harm to the north-west of Cheslyn Hay and moderate harm areas to the south-west and north-east of Great Wyrley

¹ Calverton Parish Council v Greater Nottingham Councils & others (2015)

1.4 Tier 2 Settlements

Wombourne

- the Green Belt parcels surrounding the settlement range significantly, from very high to low-moderate harm
- the majority of Green Belt land adjacent to the settlement is **moderate-high harm**, although there is a **significant area of moderate harm** to the west of the settlement and **smaller areas of low-moderate harm** on the settlement's south-western and north-eastern extent
- one Green Belt parcel on the settlement's south-western edge is **previously developed land**

Brewood

- the Green Belt parcels surrounding the settlement range from low-moderate to moderate-high harm
- the majority of Green Belt land adjacent to the settlement is **moderate-high harm**, although there are **small areas of moderate harm** to the south-west of the settlement

Kinver

- the Green Belt parcels surrounding the settlement range from very low to high harm
- the majority of Green Belt land adjacent to the settlement is either **moderate-high or moderate** harm

Perton

- the Green Belt parcels surrounding the settlement range from low to very high harm
- the majority of Green Belt land adjacent to the settlement is either **moderate-high or high harm**, although there is a **small area of low harm** land on the settlement's eastern edge

Huntington

- the Green Belt parcels surrounding the settlement range from high to very high harm
- the majority of Green Belt land adjacent to the settlement is **high harm**

1.5 Tier 3 Settlements

Essington

- the Green Belt parcels surrounding the settlement range from moderate to high harm
- the majority of Green Belt land adjacent to the settlement is **high harm**, although there is a **significant area of moderate-high harm to the south-east** of the settlement

Coven

- the Green Belt parcels surrounding the settlement range from low-moderate to high harm
- the majority of Green Belt land adjacent to the settlement is **high harm**, although there are **areas of moderate and low-moderate harm** adjacent to the settlement elsewhere

Featherstone

- the Green Belt parcels surrounding the settlement range from moderate to high harm
- the majority of Green Belt land adjacent to the settlement is **moderate or moderate-high harm**

Shareshill

- the Green Belt parcels surrounding the settlement range from moderate to high harm
- the majority of Green Belt land adjacent to the settlement is **moderate-high harm**, although there are **small areas of moderate harm** also adjacent to the settlement

Wheaton Aston

- the vast majority of the settlement is surrounded by **Open Countryside** land, which would not result in Green Belt harm if released

Pattingham

- the Green Belt parcels surrounding the settlement range from moderate to moderate-high harm
- the majority of Green Belt surrounding the settlement is **moderate-high harm**, although there are **small areas of moderate harm** also adjacent to the settlement

Swindon

- the Green Belt parcels surrounding the settlement range from moderate to very high harm
- the majority of Green Belt surrounding the settlement is either **moderate-high or high harm**, although there are **small areas of moderate harm** also adjacent to the settlement

1.6 Tier 4 Settlements

Bednall

- The entirety of the settlement is surrounded by Green Belt scoring **moderate-high harm**

Bishops Wood

- The vast majority of the settlement is surrounded by Green Belt scoring **moderate-high harm**, with the exception of a **small parcel of moderate harm** to the north of the settlement

Bobbington

- The vast majority of the settlement is surrounded by Green Belt scoring either **moderate or moderate-high harm**
- There are also **very limited areas of low-moderate harm** Green Belt land adjacent to the settlement edge

Dunston

- The settlement is surrounded by **Open Countryside land**, which would not result in Green Belt harm if released

Himley

- The settlement is entirely surrounded by Green Belt scoring either **moderate or moderate-high** harm

Trysull

- The Green Belt land adjacent to the settlement mainly scores **moderate harm**
There are also smaller areas of **low-moderate harm** Green Belt land adjacent to the settlement edge

Seisdon

- The majority of Green Belt land adjacent to the settlement scores **moderate harm**

1.7 Summary of Green Belt harm for Tier 1-4 settlements

- Of the Tier 1 settlements, the majority of Green Belt land surrounding Codsall/Bilbrook and Cheslyn Hay/Great Wyrley is high Green Belt harm, although there are smaller areas of lesser Green Belt harm in both settlements, particularly Cheslyn Hay/Great Wyrley.
- Most Tier 2 villages are predominately surrounded by land of moderate-high Green Belt harm, with the exception of Huntington which is entirely surrounded by high and very high harm Green Belt land
- There are significant areas of moderate Green Belt harm adjacent to Kinver and Wombourne, with the latter also containing a significant area of previously developed Green Belt land to the south-west of the settlement. Smaller areas of lesser Green Belt harm also exist adjacent to Brewood and Perton.
- Most Tier 3 villages are predominately surrounded by land of moderate-high or high Green Belt harm, although there are notable areas of lesser Green Belt harm in most settlements
- Most Tier 4 villages are predominately surrounded by land of moderate or moderate-high Green Belt harm, although there are limited areas of lesser Green Belt harm in some settlements, particularly Bobbington and Trysull
- A number of settlements in the north of the District lie partially/entirely within Open Countryside. Penkridge (Tier 1 settlement) has a substantial area of Open Countryside land beyond the Green Belt to the north, whilst the settlements of Wheaton Aston (Tier 3) and Dunston (Tier 4) are entirely surrounded by Open Countryside

1.8 Urban Extension/New Settlement areas of search

North of Black Country

- the Green Belt land adjacent to this area of the conurbation's urban edge range from moderate-high to very high harm
the majority of Green Belt land adjacent to the urban edge in this location scores either **high or very high harm**
- there is also a **smaller area of land of moderate-high harm** towards the eastern end of this area of search, although this is relatively limited in extent compared to the areas of high and very high harm elsewhere

West of Black Country

- the Green Belt land adjacent to this area of the conurbation's urban edge range from low to very high harm
- the majority of Green Belt land adjacent to the urban edge in this location scores either **high or very high harm**
- there are also **multiple smaller areas of moderate-high harm** along the length of the urban edge in this area of search

South-west of Cannock

- the Green Belt land adjacent to this area of Cannock's urban edge ranges from moderate-high to very high harm
- the majority of Green Belt land adjacent to the urban edge in this location scores either **high or very high harm**
- there is a **very small area of land of moderate-high harm** to the south of Cannock (adjacent Wedges Mills)

South of Stafford

- the land in this area of search is entirely within the **Open Countryside** and would therefore cause no Green Belt harm if released for development

A449/West Coast Mainline corridor new settlement area of search

- the Green Belt land along this corridor ranges from moderate-high to very high harm
- the majority of Green Belt land in this area of search scores **high harm**
- there is a **significant area of land of moderate-high harm** to the north of Four Ashes strategic employment site, although this area is currently the subject of a planning inquiry, as it is proposed for a strategic rail freight interchange nearly 300ha in size (West Midlands Interchange)
- part of the area of search (around Dunston) is within the **Open Countryside**, which would therefore result in no Green Belt harm if released, although NPPF policy is clear that the release of such areas requires consideration of the establishment of new Green Belt

1.9 Summary of Green Belt harm for urban edge locations and new settlement areas of search

- The majority of Green Belt land on the northern and western edge of the Black Country urban area and to the south-west of Cannock is either high or very high harm
- There are limited areas of Green Belt whose release would cause lesser harm, particularly on the western edge of the Black Country urban area, where multiple small to medium size moderate-high harm parcels exist
- The land adjacent to the southern extent of Stafford's urban area is within the Open Countryside and would therefore cause no Green Belt harm if released for development
- New settlement areas of search are predominantly within areas of high Green Belt harm, although there are also significant areas of the A449 corridor that are either moderate-high Green Belt harm, or which are in the Open Countryside

2. Greater Birmingham Housing Market Area (GBHMA) Strategic Growth Study findings

- 2.1 National planning policy, guidance and the Localism Act 2011 require local authorities to work together through the 'Duty to Cooperate' to meet housing needs across the relevant geography to ensure housing needs are met. South Staffordshire sits within a well-established functional housing market area with thirteen other local authorities around the West Midlands conurbation, which is known as the Greater Birmingham Housing Market Area (GBHMA).
- 2.2 A joint study (the 2018 GBHMA Strategic Growth Study) was prepared across all fourteen GBHMA local authorities. This estimates the extent of the housing shortfall across the GBHMA, concluding that this shortfall largely arose from Birmingham and the Black Country authorities and that it couldn't be accommodated on existing policy-compliant sites identified for housing in those areas. It then went on to identify a range of potential development options both within the Green Belt and beyond which may assist in meeting this shortfall on a comprehensive basis across the GBHMA, assessing which were the most sustainable and deliverable options for meeting the housing shortfall. These are depicted in Figures 1 and 2 on the following pages.

Figure 1: Shortlisted areas of search within the Green Belt from the GBHMA Strategic Growth Study

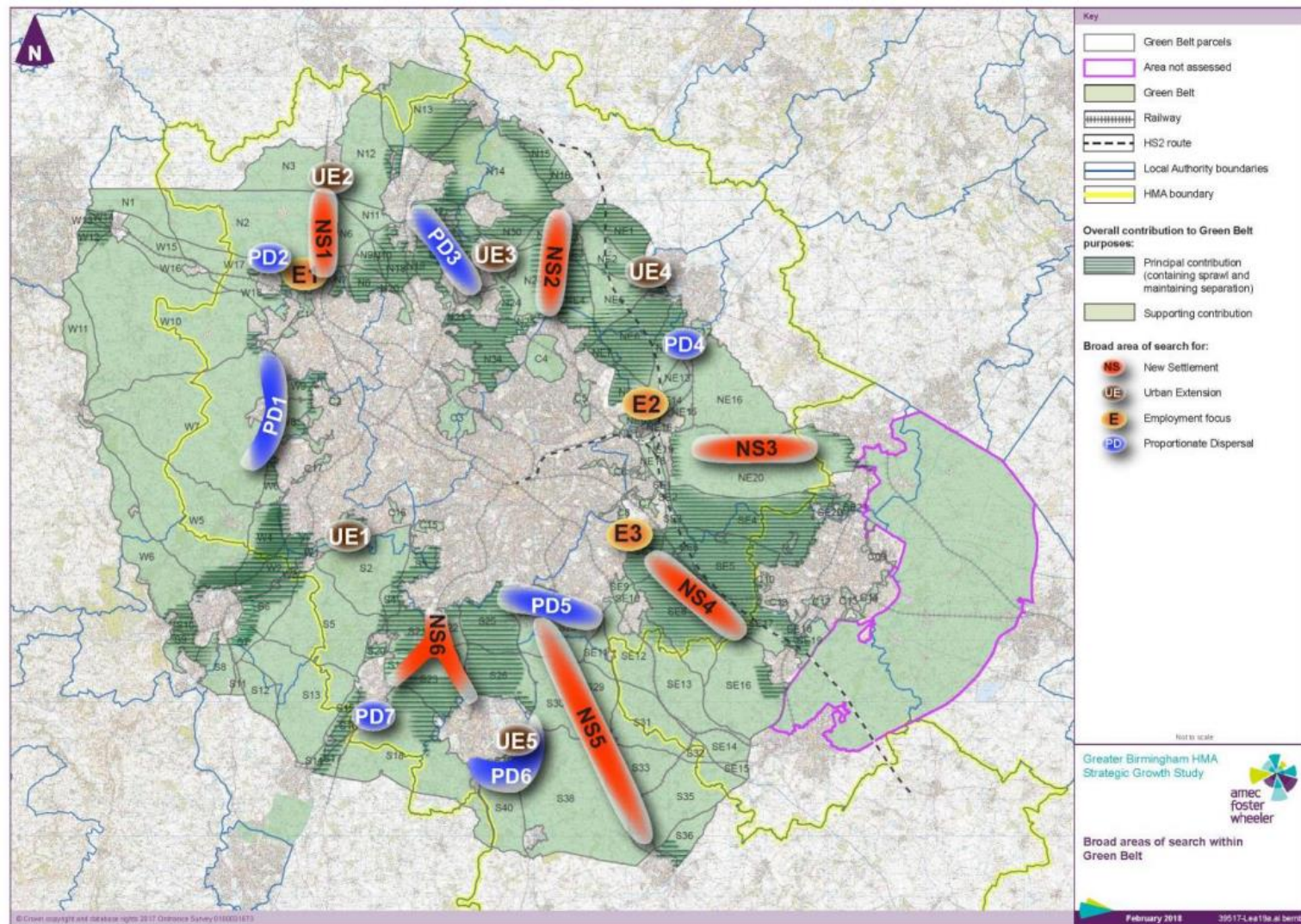
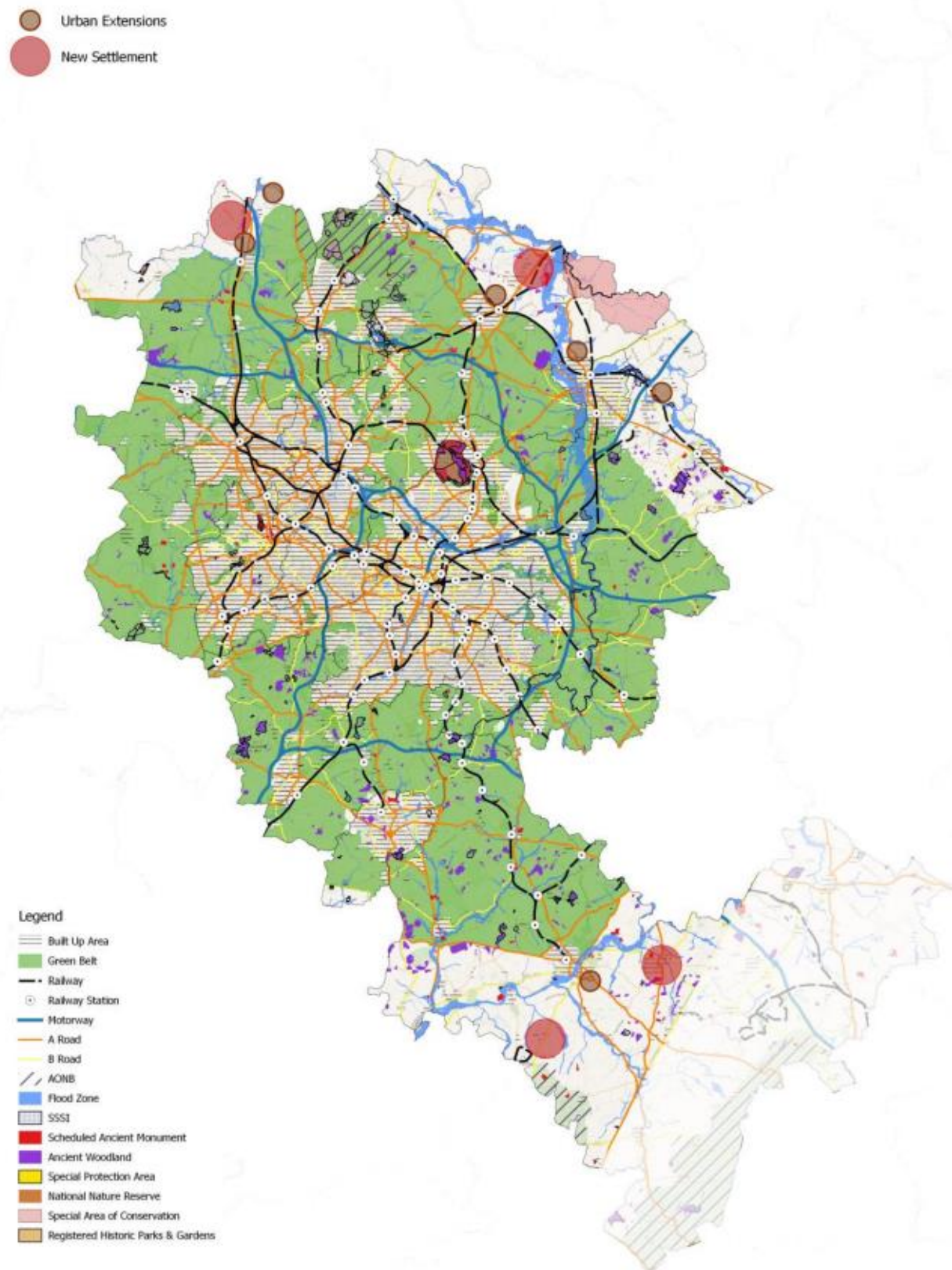


Figure 2: Shortlisted locations beyond the Green Belt from the GBHMA Strategic Growth Study



2.3 In assessing options, regard was had to the following factors:

- Housing need (i.e. proximity to the conurbation)
- Green Belt harm
- Sustainability Appraisal
- Public transport access
- Deliverability

2.4 The shortlisted urban extension and new settlement options were then consistently assessed across the GBHMA geography.

Urban extensions

2.5 These are defined in the study as areas of search for 1,500 – 7,500 dwellings, which would provide opportunities for development of a scale which could also support small-scale employment and associated services and infrastructure, or for housing to be co-located with an existing strategic employment area². The GBHMA Strategic Growth Study assessed the following locations for urban extensions in South Staffordshire:

- North of Penkridge
- South of Penkridge
- South of Stafford
- North of Wolverhampton in the vicinity of i54 (employment-led)

2.6 Having assessed the above options against the criteria set out above, the study recommended the following urban extensions be taken forward as recommended approaches to meeting the GBHMA housing shortfall:

- **North of Penkridge**
- **North of Wolverhampton in the vicinity of i54 (employment-led)**

2.7 The selection of these urban extensions recognised that these two areas were some of the strongest performing areas of search for urban extensions across the GBHMA. North of Penkridge performed particularly well in terms of public transport and Green Belt³, whilst North of Wolverhampton performed particularly well in terms of proximity to sources of housing need and sustainability⁴. Conversely, South of Stafford was deemed unlikely to meet the unmet needs of the conurbation and performed particularly poorly in terms of deliverability and public transport access⁵, whilst South of Penkridge performed less well than the option to the north of the village in terms of Green Belt⁶.

New settlements

2.8 These are defined in the study as areas of search which would involve development of 10,000 – 15,000 homes, plus services and employment with an aspiration for self-containment, recognising that there will be some commuting to adjacent employment and service centres.

² Paragraphs 1.72 – 1.80 of the GBHMA Strategic Growth Study

³ Paragraph 9.90 of the GBHMA Strategic Growth Study

⁴ Paragraph 9.101 of the GBHMA Strategic Growth Study

⁵ Paragraph 9.92 of the GBHMA Strategic Growth Study

⁶ Paragraph 9.91 of the GBHMA Strategic Growth Study

2.9 The GBHMA Strategic Growth Study assessed the following locations for new settlements within South Staffordshire:

- Around Dunston
- Between Wolverhampton and Penkridge

2.10 Having assessed the above options against the criteria set out above, the study did not recommend these new settlement areas of search be taken forward as recommended approaches to meeting the GBHMA housing shortfall in South Staffordshire. Dunston performed particularly poorly in terms of deliverability, public transport access and addressing housing need⁷. Similarly, the area of search between Wolverhampton and Penkridge performed poorly in terms of public transport and deliverability when compared to other options for new settlements recommended by the study⁸.

Proportionate dispersal

2.11 The study defines this model as comprising smaller scale (500 – 2,500 units) development which is distributed throughout an area according to local assessments of capacity (particularly services) and available sites through the SHLAA process. The study recommends the following potential locations for proportionate dispersal in the District:

- **The western edge of the conurbation between Stourbridge and Wolverhampton**
- **To the north of Codsall/Bilbrook**

The broad areas of search to which these relate are shown in Figure 1.

⁷ Paragraph 9.79 of the GBHMA Strategic Growth Study

⁸ Paragraph 9.80 of the GBHMA Strategic Growth Study

Conclusions

2.12 The GBHMA Strategic Growth Study draws a number of key findings regarding potential areas of search for strategic developments in the District:

- The study recommends the District should look for opportunities to deliver urban extensions of 1,500 – 7,500 dwellings to the north of Penkridge and to the north of Wolverhampton in the vicinity of i54. This is on the basis that such urban extensions would provide associated services and infrastructure to serve new residents and would offer opportunities for small-scale employment, or for housing to be co-located with an existing strategic employment area.
- The study recommends the District should look for opportunities to deliver areas of smaller-scale development (500 – 2,500 dwellings) in areas of search to the north of Codsall/Bilbrook and the western edge of the conurbation between Stourbridge and Wolverhampton.
- The study assessed the potential for urban extensions of 1,500 – 7,500 dwellings to the south of Stafford and to the south of Penkridge, but did not recommend that these should be taken forward further. This reflected the distance of south of Stafford from the source of the unmet needs, and the area's relatively poor performance in terms of deliverability and public transport access.
- The study did not recommend any freestanding new settlements of 10,000+ dwellings in South Staffordshire, recognising that the options in South Staffordshire performed poorly in terms of deliverability and public transport access when compared to other options in the GBHMA.

3. Access to employment centres and jobs

- 3.1 There are a number of existing national policy requirements and local evidence base documents that address the need to consider the degree of sustainable access to employment when assessing future spatial distributions for residential growth. Key considerations are set out below.

National Planning Policy Framework (NPPF) 2019

- 3.2 The NPPF includes a number of provisions that encourage the consideration of access to employment via sustainable transport means in plan-making. These include:
- ensuring larger housing sites have sufficient access to services and employment opportunities within the development itself, or in larger towns to which there is good access (para 72)
 - the identification and pursuit of opportunities to promote walking, cycling and public transport (para 102)
 - supporting an appropriate mix of uses across an area to minimise the number and length of journeys needed for employment, shopping, leisure and other activities (para 104)
 - ensuring appropriate opportunities to promote sustainable transport modes can be taken up when allocation sites (para 108)
- 3.3 It is therefore clearly important that regard is had to the ability to access employment via sustainable transport modes when considering the future distribution of housing growth through the Local Plan review.

Royal Town Planning Institute (RTPI) Research Paper: Settlement Patterns, Urban Form and Sustainability (May 2018)

- 3.4 This recent RTPI research paper summarises current research on the subject of delivering a spatial distribution of housing development which reduces congestion and increases economic productivity, through promoting accessibility to key services through sustainable transport modes. Specifically, it concludes that outside of brownfield locations in urban centres, the next most sustainable modes of housing development in these terms are urban extensions to major urban areas and settlements with inter-urban rail links into neighbouring urban areas⁹.

South Staffordshire Economic Development Needs Assessment (EDNA) 2018

- 3.5 The EDNA 2018 identifies South Staffordshire, Wolverhampton, Dudley, Walsall and Cannock as forming a single functional economic market area, within which commuting flows are largely self-contained. In addition to this, the study includes a number of key findings concerning the labour market profile of the District and the existing commuting flows and distribution of employment sites throughout the District. Key findings include:
- the strong spatial and economic links between the District and the Black Country Functional Economic Market Area (p.16)

⁹ See Figure 3.7 of [Royal Town Planning Institute \(RTPI\) Research Paper: Settlement Patterns, Urban Form and Sustainability \(May 2018\)](#)

- the District's excellent access to the rail network - Wolverhampton centre can be accessed in 8 minutes and Birmingham can be accessed in 30 minutes (p.16)
- the concentration of larger businesses in the District on the four freestanding strategic employment sites (particularly i54 South Staffordshire) with the majority of businesses in the District existing as micro, small or medium enterprises outside of these locations (p.37)
- the concentration of 42% of the Districts population within senior managerial, managerial and professional jobs, with senior directors being a significant proportion of this amount (p.37)
- the increasing trend of a larger number of South Staffordshire residents travel further to work when compared to historic census data (p.38)
- that only 21% of the District's working resident population live and work in South Staffordshire, with the vast majority commuting out of the District to work (p.44)
- that sectoral employment of South Staffordshire is complemented by the Black Country and Birmingham, with South Staffordshire providing higher concentrations of manufacturing, the Black Country providing greater concentrations of wholesale, retail and transport and Birmingham providing greater concentrations of financial, professional and public administration activities (p.45)
- the likelihood that the higher skilled population in South Staffordshire works in the larger urban centres in the surrounding area (p.46)
- the District's relationship with surrounding large/urban centres (e.g. Telford, Stafford, Dudley, Walsall, Wolverhampton and Birmingham) with which it shares a large amount of economic transactions (p.49)
- the particularly strong market linkages between South Staffordshire and a large part of the Black Country – in particular Wolverhampton but also Dudley and Walsall (p.49)
- that the north of the District adjacent to the northern edge of the Black Country conurbation and along the A449 as it runs towards Stafford provides 88.2%¹⁰ of the District's current largest and best quality employment sites (Figure 6.2)
- that 99.6%¹¹ of the District's available supply of developable employment land is located in close proximity to the Black Country's northern edge or along the A449 corridor running north to Stafford (Figure 6.4)

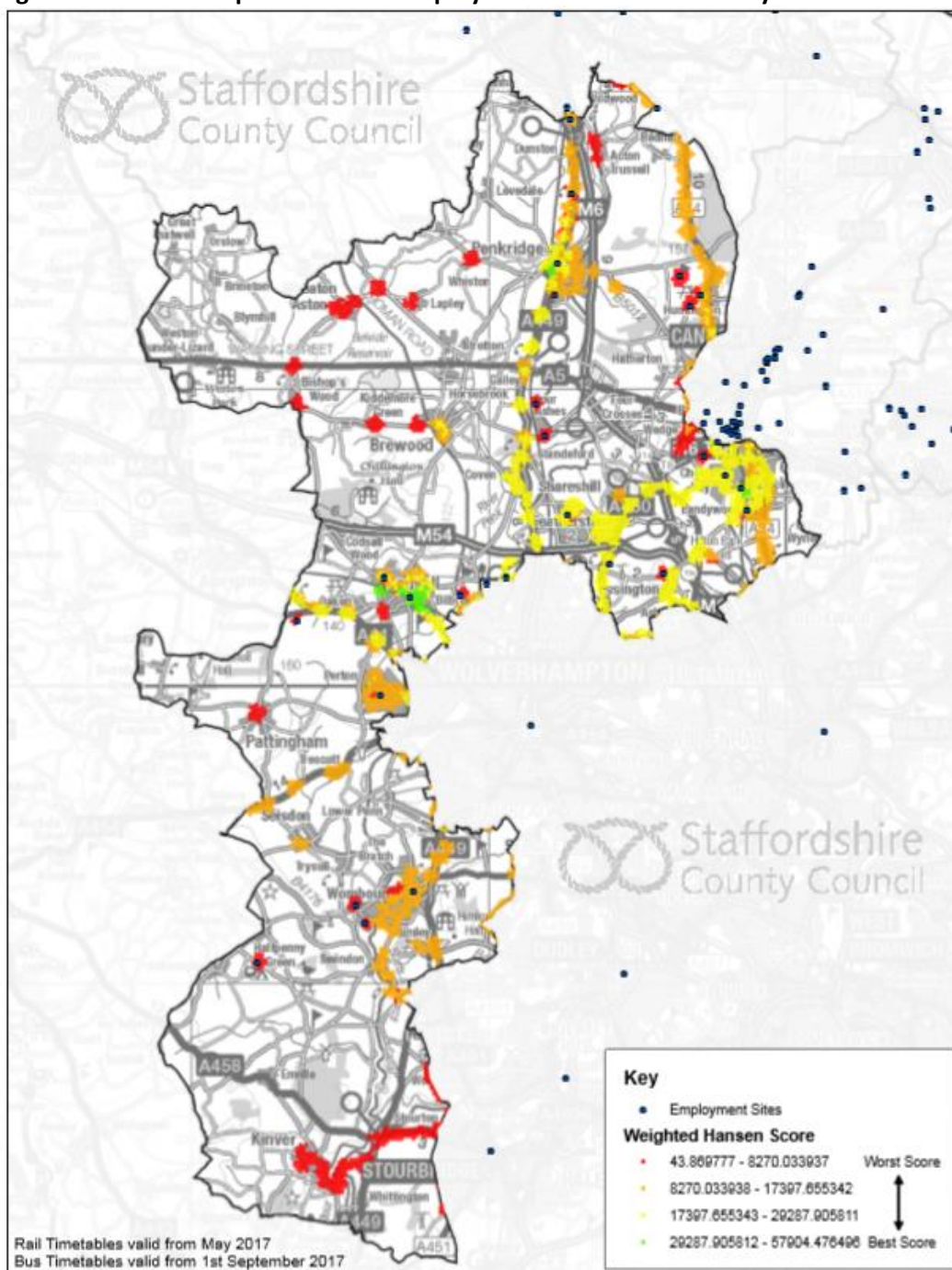
¹⁰ 232.96ha of 'best' quality employment sites are located in these areas, compared to the overall 264.19ha supply of such sites in the District as a whole

¹¹ 63.46ha of 'best' quality developable land is located in these areas, compared to the overall 63.71ha supply figure of such land in the District as a whole

Rural Services and Facilities Audit 2018

- 3.6 The ability of different parts of the District to access employment centres via rail and bus links was considered in the Council's Rural Services and Facilities Audit 2018. This included the following mapping, which shows public transport access to employment centres within and outside of the District from different locations.

Figure 3: Public Transport Access to Employment Centres Wednesday 07:30am to 09:30am



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You are not permitted to copy, sub-license, distribute or sell any of this data to third parties in any form.
Use of this data is subject to the terms and conditions shown at www.staffordshire.gov.uk/maps
Produced by Staffordshire County Council, 2017.



- 3.7 The weighted Hansen scores displayed above indicate the number of employment destinations that can be accessed within a 60 minute journey time, the dis-benefits of travel in terms of journey time, origin point population and the total number of jobs available at a destination.
- 3.8 Speaking broadly, this displays a similar picture to the findings of the EDNA 2018, which recognised the concentration of larger higher quality employment sites in the north of the District, the strong commuting relationship with the Black Country (particularly Wolverhampton) and the rail links with the Black Country and Birmingham within the District. Similarly, the mapping recognises the important role that rail links play in allowing local residents to access jobs, showing that the best access to employment destinations is present in the District's larger villages with rail access. Outside of these villages, it also demonstrates that the areas with the second best access to employment opportunities via public transport are largely located adjacent to the northern edge of the Black Country conurbation or along the A449 corridor.

Local job/dwelling ratios

- 3.9 Within the boundaries of the District, the local ratio of dwellings to jobs has been examined at a ward-specific level. 2011 Census information and 2016 BRES data has been used to identify wards containing both higher job numbers (i.e. 2,000 or more) and a higher ratio of jobs to existing dwellings (1:1 or greater). These are highlighted in the table over.

| Figure 4 | | | | |
|---|--------------------------------|-------------------------|--|--------------|
| 2011 ward | 2011 dwellings (Census) | 2016 jobs (BRES) | Difference between jobs and dwellings | Ratio |
| Locality 1 | | | | |
| E05007002 : Penkridge North East and Acton Trussell | 1,665 | 4,000 | 2,335 | 1:2.4 |
| E05007003 : Penkridge South East | 1,796 | 1,300 | -496 | 1:0.7 |
| E05007004 : Penkridge West | 925 | 500 | -425 | 1:0.6 |
| E05006999 : Huntington and Hatherton | 2,084 | 1,000 | -1,084 | 1:0.5 |
| Total | 6,470 | 6,800 | 330 | 1:1 |
| Locality 2 | | | | |
| E05006989 : Brewood and Coven | 3,055 | 3,000 | -55 | 1:1 |
| E05007009 : Wheaton Aston, Bishopswood and Lapley | 1,797 | 1,500 | -297 | 1:0.8 |
| Total | 4,852 | 4,500 | -352 | 1:0.9 |
| Locality 3 | | | | |
| E05006990 : Cheslyn Hay North and Saredon | 1,783 | 2,000 | 217 | 1:1.1 |
| E05006991 : Cheslyn Hay South | 1,532 | 600 | -932 | 1:0.4 |
| E05006996 : Great Wyrley Landywood | 1,991 | 700 | -1,291 | 1:0.4 |
| E05006997 : Great Wyrley Town | 2,602 | 1,000 | -1,602 | 1:0.4 |
| E05006994 : Essington | 1,923 | 1,300 | -623 | 1:0.7 |
| E05006995 : Featherstone and Sharesill | 2,042 | 3,000 | 958 | 1:1.5 |
| Total | 11,873 | 8,600 | -3,273 | 1:0.7 |
| Locality 4 | | | | |
| E05007001 : Pattingham and Patshull | 970 | 400 | -570 | 1:0.4 |
| E05007005 : Perton Dippons | 797 | 600 | -197 | 1:0.8 |
| E05007006 : Perton East | 838 | 200 | -638 | 1:0.3 |
| E05007007 : Perton Lakeside | 2,855 | 700 | -2,155 | 1:0.2 |
| E05006988 : Bilbrook | 1,939 | 3,000 | 1,061 | 1:1.6 |
| E05006992 : Codsall North | 1,835 | 1,500 | -335 | 1:0.8 |
| E05006993 : Codsall South | 1,670 | 1,000 | -670 | 1:0.6 |
| Total | 10,904 | 7,400 | -3,504 | 1:0.7 |
| Locality 5 | | | | |
| E05006998 : Himley and Swindon | 907 | 800 | -107 | 1:0.9 |
| E05007000 : Kinver | 3,179 | 2,000 | -1,179 | 1:0.6 |
| E05007008 : Trysull and Seisdon | 926 | 1,000 | 74 | 1:1.1 |
| E05007010 : Wombourne North and Lower Penn | 2,718 | 1,300 | -1,418 | 1:0.5 |
| E05007011 : Wombourne South East | 1,809 | 1,000 | -809 | 1:0.6 |
| E05007012 : Wombourne South West | 1,983 | 1,500 | -483 | 1:0.8 |
| Total | 11,522 | 7,600 | -3,922 | 1:0.8 |

3.10 Whilst this information could be considered as one indicator of the ability of certain wards to accommodate a significant increase in housing whilst ensuring new dwellings have access to jobs nearby, there are several important caveats on using the data in this manner. As set out in the EDNA 2018, South Staffordshire self-contains very little of its workforce population, with most of the District's workforce travelling outside of the District for work within the wider Functional Economic Market Area. This is particularly the case with reference to the Black Country, whose jobs and road and rail transport links with South Staffordshire help to

reinforce this relationship. Furthermore, in many cases a ward with a high number of jobs and a positive ratio of jobs to dwellings will often cover only a small part of the adjacent resident population of the wider residential areas adjacent to the ward¹². Equally, given the freestanding nature of many of the District's strategic employment sites (which are often located remotely from nearby rural communities) it does not necessarily follow that the jobs in each ward are likely to be accessed via sustainable transport means.

- 3.11 Despite these caveats, it can be seen from this information that the Tier 1 settlements of Bilbrook/Codsall, Penkridge and Cheslyn Hay/Great Wyrley all contain wards which deliver 2,000 or more jobs and have a jobs/dwellings ratio of 1:1 or greater. However, when an average picture is taken across all wards contained within these Tier 1 settlements, Codsall/Bilbrook and Penkridge are the only Tier 1 settlements which still achieve a 1:1 ratio or better.

| Figure 5 | | | | |
|---|----------------------------|---------------------|--|--------------|
| 2011 ward | 2011 dwellings (Census) | 2016 jobs (BRES) | Difference between jobs and dwellings | Ratio |
| Tier 1 Villages | | | | |
| Codsall/Bilbrook | | | | |
| E05006988 : Bilbrook | 1,939 | 3,000 | 1,061 | 1:1.6 |
| E05006992 : Codsall North | 1,835 | 1,500 | -335 | 1:0.8 |
| E05006993 : Codsall South | 1,670 | 1,000 | -670 | 1:0.6 |
| Total | 5,444 | 5,500 | 56 | 1:1 |
| Cheslyn Hay/Great Wyrley | | | | |
| E05006990 : Cheslyn Hay North and Saredon | 1,783 | 2,000 | 217 | 1:1.1 |
| E05006991 : Cheslyn Hay South | 1,532 | 600 | -932 | 1:0.4 |
| E05006996 : Great Wyrley Landywood | 1,991 | 700 | -1,291 | 1:0.4 |
| E05006997 : Great Wyrley Town | 2,602 | 1,000 | -1,602 | 1:0.4 |
| Total | 7,908 | 4,300 | -3,608 | 1:0.5 |
| Penkridge | | | | |
| E05007002 : Penkridge North East and Acton Trussell | 1,665 | 4,000 | 2,335 | 1:2.4 |
| E05007003 : Penkridge South East | 1,796 | 1,300 | -496 | 1:0.7 |
| E05007004 : Penkridge West | 925 | 500 | -425 | 1:0.6 |
| Total | 4,386 | 5,800 | 1,414 | 1:1.3 |

- 3.12 With regards to the rest of the District, it is clear from Figure 5 that the wards of Featherstone and Shareshill and Brewood and Coven contain higher jobs/dwellings ratios and higher numbers of overall jobs compared to other wards. This is likely due to both wards containing freestanding Strategic Employment Sites (e.g. Hilton Cross, ROF Featherstone and Four Ashes) in close proximity to the A449 or northern edge of the Black Country.

¹² For example, Penkridge North East and Acton Trussell, Cheslyn Hay North and Saredon and Bilbrook wards cover a small proportion of the adjacent resident populations of Penkridge, Cheslyn Hay/Great Wyrley and Codsall/Bilbrook respectively, which contain numerous other wards with less favourable jobs/dwellings ratios

Conclusions

3.13 Drawing all of the above together, some summary conclusions can be drawn about the best ways in which the locations of new housing developments can be aligned to employment within the District:

- There is a clear requirement in national planning policy to consider the ability of new residents to sustainably access local employment opportunities. Outside of major urban centres, recent RTP1 research indicates that urban extensions to major urban areas and development in smaller settlements on rail corridors into neighbouring urban areas offer the best locations to reduce congestion and provide sustainable access to key services and employment.
- Some areas of the District have a higher job/dwelling ratio than others, in particular the settlements of Codsall/Bilbrook and Penkridge and wards containing freestanding employment sites to the north of the Black Country and along the A449 corridor.
- In reality relatively few of South Staffordshire's resident population travel to jobs within the District for work, with the majority of residents commuting to adjacent areas instead (particularly Wolverhampton).
- The high level of out-commuting in the District is likely related to a number of factors including local sectoral profiles, proximity to neighbouring urban centres with complementary employment offers and the relative lack of large scale employers within the District outside of the existing four freestanding strategic employment sites.
- Rail travel offers important opportunities for local residents to sustainably access jobs, given the short travel times to employment centres in the Black Country (particularly Wolverhampton) and the comparatively high level of jobs which can be quickly accessed from villages with rail stations.
- The northern edge of the Black Country conurbation and the A449 corridor are also key areas within which employment is concentrated, reflecting high concentration of large high quality employment sites in these locations and the relatively good level of access to employment via public transport in these locations.

4. Local housing need indicators

- 4.1 National planning policy requires that planning policies should be responsive to local circumstances, supporting housing developments that reflect local needs, whilst ensuring housing is located where it will enhance or maintain the vitality of rural communities¹³. Therefore, it is appropriate to examine local village-level indicators that could suggest where housing could address existing rural issues such as poor affordability for the existing community. Equally, national policy also requires needs that cannot be met within neighbouring areas are taken into account in plan-making¹⁴, which is relevant for South Staffordshire given the emerging unmet housing needs of the adjacent Black Country authorities and (further afield but within the same housing market area) Birmingham.

Lower quartile affordability ratios for Tier 1 - 4 villages

- 4.2 The sections below present information on lower quartile affordability ratios (i.e. lower quartile incomes compared with lower quartile house prices) for each of the Tier 1 and 2 villages within the District as identified in the 2019 Rural Services and Facilities Audit, based on ward-level data. This level of analysis is focused on Tier 1 and 2 villages as these sizes of villages tend to be the population centres within the wards which contain them, whereas wards containing Tier 3 to 4 villages tend to contain multiple villages of similar sizes/tiers or contain other settlements of significantly larger populations than the Tier 3 and 4 villages in question.
- 4.3 The table overleaf presents the lower quartile affordability ratio for each of the District's larger villages, based upon grouped ward-level data collected for a five year period (2013-2018). By way of comparison, the average lower-quartile affordability ratio for South Staffordshire across the same period is 9.05, with the average West Midlands lower quartile ratio sitting at 8.78 (at September 2018). Therefore, the table below can provide some indication of which settlements are performing significantly worse than the regional picture.

¹³ NPPF paragraphs 77 and 78

¹⁴ NPPF paragraph 60

| Figure 6: Average ratio of Lower Quartile Incomes to Lower Quartile House Prices (April 13 – April 18) | |
|---|-------|
| Tier 1 | |
| Bilbrook/Codsall | 10.39 |
| Cheslyn Hay/Great Wyrley | 8.80 |
| Penkridge | 9.72 |
| Tier 2 | |
| Brewood | 10.80 |
| Huntington | 8.41 |
| Kinver | 9.28 |
| Perton | 7.62 |
| Wombourne | 10.03 |
| Tier 3 | |
| Coven | 10.80 |
| Essington | 9.64 |
| Featherstone | 7.69 |
| Pattingham | 10.65 |
| Shareshill | 7.69 |
| Swindon | 11.19 |
| Wheaton Aston | 9.22 |
| Tier 4 | |
| Bednall | 10.93 |
| Bishops Wood | 9.22 |
| Bobbington, Seisdon & Trysull | 11.16 |
| Dunston | 10.93 |
| Himley | 11.19 |

Source: Hometrack Housing Intelligence System

- 4.4 As can be seen from the above table, of the Tier 1 villages Penkridge and Codsall/Bilbrook perform significantly worse in terms of affordability when compared to the District and West Midlands averages. Of the Tier 2 villages, Brewood and Wombourne have the worst local affordability when compared with the District and West Midlands as a whole, with Kinver also (to a lesser extent) exceeding these averages. Of the Tier 3 villages, Coven, Essington, Pattingham, Swindon and Wheaton Aston all perform poorly in terms of affordability, whilst all Tier 4 villages perform poorly in these terms.

The District's emerging households

- 4.5 One of South Staffordshire's local housing priorities is ensuring that the right types of housing are provided in the right location to meet local needs, particularly through providing a greater number of smaller properties for young families¹⁵. It is therefore important to examine which settlements within the District currently have the highest levels of young population, as this may offer some indication of where there are likely to be newly emerging households in the plan period and where additional housing delivery may allow greater amounts of the District's younger population to remain within the settlements within which they were raised.

¹⁵ South Staffordshire Housing and Homelessness Strategy 2018-2022

Figure 7

| Location (ward) | Total population | 0-16 year old population | % of District's 0-16 year old population |
|---|------------------|--------------------------|--|
| South Staffordshire totals | 111,890 | 18,459 | |
| Tier 1 Villages | | | |
| Codsall/Bilbrook | | | |
| E05006988 : Bilbrook | 4,208 | 769 | |
| E05006992 : Codsall North | 4,197 | 745 | |
| E05006993 : Codsall South | 4,157 | 740 | |
| Total | 12,562 | 2,254 | 12 |
| Cheslyn Hay/Great Wyrley | | | |
| E05006990 : Cheslyn Hay North and Saredon | 4,485 | 834 | |
| E05006991 : Cheslyn Hay South | 3,635 | 586 | |
| E05006996 : Great Wyrley Landywood | 4,972 | 833 | |
| E05006997 : Great Wyrley Town | 6,364 | 1,061 | |
| Total | 19,456 | 3,314 | 18 |
| Penkridge | | | |
| E05007002 : Penkridge North East and Acton Trussell | 3,844 | 572 | |
| E05007003 : Penkridge South East | 4,370 | 839 | |
| E05007004 : Penkridge West | 2,031 | 281 | |
| Total | 10,245 | 1,692 | 9 |
| Tier 2 Villages | | | |
| Brewood | | | |
| E05006989 : Brewood and Coven | 6,745 | 993 | |
| Total | 6,745 | 993 | 5 |
| Wombourne | | | |
| E05007010 : Wombourne North and Lower Penn | 6,702 | 1,144 | |
| E05007011 : Wombourne South East | 3,893 | 529 | |
| E05007012 : Wombourne South West | 4,793 | 893 | |
| Total | 15,388 | 2,566 | 14 |
| Perton | | | |
| E05007005 : Perton Dippons | 1,996 | 329 | |
| E05007006 : Perton East | 2,157 | 436 | |
| E05007007 : Perton Lakeside | 6,420 | 1,126 | |
| Total | 10,573 | 1,891 | 10 |
| Huntington | | | |
| E05006999 : Huntington and Hatherton | 5,674 | 1,191 | |
| Total | 5,674 | 1,191 | 6 |
| Kinver | | | |
| E05007000 : Kinver | 7,281 | 1,043 | |
| Total | 7,281 | 1,043 | 6 |

Source: Table SAPE20DT8: Mid-2017 Population Estimates for 2017 Wards in England and Wales by Single Year of Age and Sex - Experimental Statistics

- 4.6 As would be expected, the Tier 1 settlements (i.e. those with the highest levels of services and facilities) have some of the largest proportions of the District's younger population within their respective wards when compared to Tier 2 villages. However, there are two

notable exceptions to this general rule. Specifically, Wombourne and Perton both have a share of the District's younger population that is comparable to Tier 1 villages, with Wombourne in particular being of a larger size than some Tier 1 settlements. Other Tier 2 settlements contain significantly less of the District's resident population.

Unmet needs from neighbouring local authorities

- 4.7 In the context of the current Local Plan review, it is important to examine where unmet needs are arising from neighbouring local authorities, as South Staffordshire sits within the Greater Birmingham Housing Market Area (GBHMA), which contains multiple local authorities who are unable to meet their own housing needs. Consequently, examining which neighbouring areas generate the greatest extent of unmet needs may help to highlight where new housing can be best located within the District. This is because households unable to find accommodation in neighbouring areas will still have ties to the areas from which they are displaced in terms of where they work, are educated or have family ties (for example). Therefore, locating housing to address the unmet needs of neighbouring areas in close geographical proximity to the areas from which the needs arise may help to ensure that displaced residents still have a good degree of access to places of employment, education etc. in the areas from which they originate.
- 4.8 Across the GBHMA there are currently a number of authorities with unmet housing needs. Currently, the adopted Birmingham Development Plan 2017 indicates that the city cannot accommodate 37,900 dwellings of its own needs, which is significant given the extent of the shortfall. However, South Staffordshire does not adjoin Birmingham and has a limited commuting relationship with the authority (as evidenced by the fact it sits within a separate functional economic market area). Therefore, whilst it is important to consider Birmingham's housing shortfall in setting the District's overall housing target, it is unlikely to help differentiate better or worse locations for housing growth within the District.
- 4.9 Perhaps more significantly, due to its proximity to South Staffordshire, is the emerging shortfall which is arising from the preparation of the Black Country Plan. The latest Black Country Urban Capacity Review 2018 indicates this sits somewhere within the region of 17,200 dwellings. According to this study, the extent of the shortfall can be broken down as follows across the four Black Country authorities;

| Local authority | Extent of unmet need to 2036 (dwellings) |
|-----------------|--|
| Wolverhampton | -1,783 |
| Walsall | -7,811 |
| Dudley | +3,393 |
| Sandwell | -11,062 |

- 4.10 Sandwell does not adjoin South Staffordshire and (similar to Birmingham) has limited commuting ties with the District. However, South Staffordshire encloses the western-most extent of Dudley, the northern and western edges of Wolverhampton and part of the northern extent of Walsall. Therefore, it is important to note that of the adjacent authorities to South Staffordshire, Wolverhampton and Walsall are the only two currently displaying an unmet housing need. This suggests that if unmet housing needs were located in close proximity to Wolverhampton and Walsall (i.e. along the north-western and northern edges of the Black Country) then this may minimise the extent to which households from these two areas are displaced from their existing communities, jobs and education.

Conclusions

4.11 Drawing all of the above together, some summary conclusions can be drawn about the best ways in which the locations of new housing developments can be aligned to local housing need indicators:

- The majority of Tier 1 - 4 villages are less affordable to their local residents when compared to the average affordability ratios in the District and West Midlands. Exceptions to this are Cheslyn Hay/Great Wyrley, Huntington, Featherstone, Shareshill and Perton, which are relatively affordable compared to other settlements. Of the Tier 1 and 2 settlements, Bilbrook/Codsall, Brewwood and Wombourne perform the worst in terms of affordability. Creating additional housing supply in these locations may offer opportunities to redress these issues, particularly through the provision of affordable housing.
- The District's younger population is predominantly concentrated in its larger Tier 1 settlements. Within the Tier 2 settlements Perton and Wombourne have larger populations of young residents. This may indicate where additional housing growth may provide the option for these residents to remain within the village within which they were raised as they form their own households.
- Of the District's neighbouring authorities, two lie within the same housing market area and have an emerging unmet housing need (Wolverhampton and Walsall). If unmet housing needs from these areas were located in close proximity to Wolverhampton and Walsall (i.e. along the north-western and northern edges of the Black Country) then this may minimise the extent to which households from these two areas are displaced from their existing communities, jobs and education.

5. Flood Risk, Natural and Built Environment & Historic Environment

Flood Risk

- 5.1 Minimising the potential exposure of new development to the risk of flooding is a key policy concern nationally. Flooding can come from large rivers, smaller watercourses, groundwater, overland runoff following heavy rain (surface water), reservoirs and sewers. Management and information on flood risk arising from main rivers is provided by the Environment Agency who map the extent of flood zone areas. The County Council are the statutory lead local flood risk with responsibility for managing local flood risk and the preparation of local flood risk management strategies.

National Planning Policy Framework (NPPF) 2019

- 5.2 The NPPF adopts a risk based and sequential approach to the management of flood risk, and states that:
- Inappropriate development in areas of flooding should be avoided (Para 155)
 - Strategic policies should be informed by a strategic flood risk assessment (Para 156)
 - Plans should apply a sequential, risk based approach to the location of development (Para 157)
 - The aim of the sequential test is to steer new development to areas with the lowest risk of flooding (Para 158)
- 5.3 It is clear that in determining the most suitable locations to site new development such decision need to be informed by an assessment of the likely risk of flooding and that sites are selected which would minimise the potential risk. Development in high risk areas is to be avoided.

Environment Agency

- 5.4 Mapping of flooding risk produced by the Environment Agency¹⁶ indicates that the flood zones in South Staffordshire are closely defined along tributaries of the main river networks within the district i.e. River Penk, Smestow Brook and River Stour. Environment Agency flood warning areas have been identified adjacent to north-west Penkridge, limited areas on the western fringes of Coven and small areas to the east and south-east of Kinver and to the west of the conurbation around Hinksford. This is a factor which has been taken into account during the selection process when considering the sites identified within the Strategic Housing Land Availability Assessment (SHLAA).

Staffordshire Local Flood Risk Management Strategy (2015)

- 5.6 The strategy is focussed on the management of local flood risk arising from small watercourses, surface water and groundwater. The strategy identifies seven high level objectives; the most relevant to the local plan review is a commitment to 'manage local flood risk and new development in a sustainable manner'.

¹⁶ <https://environment.data.gov.uk/DefraDataDownload/?mapService=EA/FloodWarningAreas&Mode=spatial>

Southern Staffordshire Surface Water Management Plan Phase 1 (2010)

- 5.7 The phase 1 plan identified Penkridge, Wombourne, Codsall, Great Wyrley, Cheslyn Hay and Perton as the settlements in South Staffordshire as being at high risk from surface water flooding.

Strategic Flood Risk Assessment (2014) and Draft Strategic Flood Risk Assessment (2019)

- 5.8 The Strategic Flood Risk Assessment (SFRA) was produced to inform the site selection process as part of Site Allocation Document (SAD). South Staffordshire is covered by two river catchment areas, the River Penk which drains north to the River Sow and Smestow Brook which drains south into the River Severn. The 2014 study noted that South Staffordshire is a predominantly rural district where flood risk to urban areas and properties is generally low. The SFRA notes that Penkridge, Wombourne and Kinver are known to be affected by fluvial (river) flooding. In addition to the flooding associated the main river network, incidents of risk association with pluvial flooding were identified at Penkridge, Wombourne, Codsall and Perton. It is noted that pluvial flooding constitutes a high proportion of flood incidents within the district. A number of post code areas were also identified as being at risk from flooding associated with artificial drainage systems and surface water runoff. A draft update of the SFRA was published in May 2019 and together with the updated Water Cycle Study will inform the site selection process as part of the Local Plan Review.

Agricultural Land Quality

- 5.9 Agricultural land is classified into five categories dependent upon quality with Grade 1 being identified as 'excellent' through to Grade 5 'very poor'. Land graded as 1,2 and 3a are generally identified as being the 'best and most versatile'.

National Planning Policy Framework

- 5.10 The NPPF defines the best and most versatile agricultural land as land which is within grades 1,2 and 3a. At Footnote 53 the framework states "where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality should be preferred to those of higher quality".

Natural England Technical Information Note TIN 049 – Agricultural Land Classification¹⁷

- 5.11 Responsibility for providing advice in relation to the loss of the best and most versatile agricultural land now resides with Natural England. Nationally it is estimated that 21% of farmland is classified as being Grades 1 and 2 with a further 21% classified as Subgrade 3a. The original maps upon which the agricultural land has been classified are not considered to be sufficiently accurate for the assessment of individual development sites however they offer general guidance. Selective surveys have since been undertaken and these can provide a more accurate assessment where they are available.

¹⁷ <http://publications.naturalengland.org.uk/publication/35012>

Agricultural Land Classification Map – West Midlands Region (Natural England)¹⁸

- 5.12 The agricultural land mapping is considered to provide a strategic overview of the picture of agricultural land quality which should be supplemented with more site specific detailed survey work where necessary. The mapping for South Staffordshire indicates that the district is characterised as comprising predominantly Grade 2 and Grade 3a quality land with areas of Grade 1 around the settlement of Pattingham.

Open Space and Green Infrastructure

- 5.13 Open space and green infrastructure encompasses a range of formal and informal spaces which can help to promote leisure opportunities and attractive living environments.

National Planning Policy Framework

- 5.14 The NPPF highlights the positive benefits that can be derived from improving the quantity and quality of areas of open space. The NPPF states that:
- Access to a network of high quality open spaces and opportunities for sport and physical activity...Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (Para 96).
 - Existing open space, sports and recreational buildings and land, including playing fields, should not be built on (Para 97)
 - Planning policies and decisions should protect and enhance public rights of way and access (Para 98)
 - Take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure (para 171)

South Staffordshire Open Space Strategy 2014-2028

- 5.15 The Council is seeking to provide for the protection and creation of a network of high quality open spaces. The district is characterised by extensive areas of open land offering opportunities for formal and informal recreation. The Open Space Strategy included an audit of 422 open spaces covering approximately 2900 hectares of accessible open space. The strategy noted that the villages of South Staffordshire benefit from a wide spread distribution of open space and are well located in terms of accessibility by the local population. The current level of amenity open space was identified as being sufficient; promoting an interconnected network of green corridors was identified as important, it was also identified that attention should be given to providing a more consistent spread of provision of play areas for children.

Landscape

- 5.16 The rich and varied landscape of South Staffordshire is predominantly based on a pattern of trees, hedgerows and small woods. In the latter years, many trees and hedgerows have been removed due to developments in agricultural activity and mineral extraction. Substantial areas of lowland heath have given way to forestry and woodland. There has been a rapid expansion

¹⁸ <http://publications.naturalengland.org.uk/publication/130044?category=5954148537204736>

in settlements since the Second World War and this has affected the character of the landscape. The planting associated with the many historic parklands and gardens is acknowledged as an important feature.

National Planning Policy Framework

5.17 The NPPF addresses the issue of landscape protection as follows:

- Protecting and enhancing valued landscapes; recognising the intrinsic character and beauty of the countryside (Para 170).
- Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues...The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major development other than in exceptional circumstance. (Para 172).
- Substantial harm to or loss of grade II registered parks or gardens; grade I and II* registered parks or gardens should be wholly exceptional (Para 194).

National Character Areas

5.18 National Character Areas¹⁹ are defined by Natural England and comprises 159 major landscape areas integrating a wide range of environmental information exploring the characteristic landscape, wildlife, cultural and geological features. Each area is based on landscape considerations rather than administrative boundaries. South Staffordshire is divided into three different character areas:

Staffordshire Plain

Extending over the north-east of the district, the Staffordshire Plain is characterised by a broad, open, gently rolling landscape enjoying wide ranging views with strong field patterns and boundaries. The close proximity to the conurbation and the dense network of roads means that development pressures in this character area have the potential to further fragment habitats and change settlement patterns and vernacular, but also provides opportunities to create a high quality built environment with multifunctioning greenspace and links to the wider rural landscape.

Cannock Chase and Cank Wood

Occupying an area of higher ground rising from the adjacent plain to the west. This area retains significant tracts of heathland and woodland plantations notably in the historical hunting forest of Cannock Chase which is a nationally designated Area of Outstanding Natural Beauty. This area also retains the strong influence of industrial heritage as a significant mining area and has experienced significant changes from development, which provides opportunities to enhance landscape quality and biodiversity value.

Mid Severn Sandstone Plateau

The undulating landscape occupying the south and west of the district comprising large open fields punctuated by lowland heath and tree lined ridges. The area is subject to development pressures relating to land on the urban fringe and commuter villages within the character area which create additional pressures in terms of habitat conservation and sustainable recreation.

¹⁹ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making/national-character-area-profiles#ncas-in-west-midlands>

Historic Landscape Areas

- 5.19 South Staffordshire has identified a total of twelve Historic Landscape Areas focussed on historic parkland and gardens. Of these five are nationally listed, three have been designated as Grade II*: Chillington, Enville and Weston and two have been designated as Grade II: Himley and Patshull.

Natural Environment

- 5.20 Protection for the natural environment is one of the principal objectives underpinning the planning system. There is a hierarchy of natural environmental assets including international, national and local designations within the District.

National Planning Policy Framework

- 5.21 The NPPF identifies the following measures in relation to the natural environment:
- Protecting and enhancing ...sites of biodiversity (in a manner commensurate with their statutory status or identified quality in the development plan) (Para 170)
 - Minimising impacts on and providing net gains for biodiversity (Para 170)
 - Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework (Para 171)
 - Take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure (Para 171)
 - To protect and enhance biodiversity and geodiversity, plans should identify map and safeguard components of local wildlife rich habitats and wider ecological networks (Para 174)
 - Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species (Para 174)

Biodiversity Action Plan

- 5.22 Biodiversity Action Plans (BAP)²⁰ are strategies to promote the conservation of biological diversity and the sustainable use of biological resources. Local action plans have been produced to co-ordinate conservation efforts in delivering in UK BAP targets at a more local level. There are four action plans which cover the district:

Central Farmland

This covers the north and south east of the district and largely comprises settled or ancient clay farmlands, much of this area is heavily influenced by rivers, tributaries and washlands. It has a high density of field ponds and has numerous small stream corridors along which broadleaved woodlands occur. There are very few internationally/nationally designated sites, the most important of which is Motte Meadows situated to the west of Wheaton Aston which is designated as SAC and a SSSI, and Four Ashes Pit SSSI which is situated to the north of Coven.

²⁰ <http://sbap.org.uk/actionplan/index.php>

Cannock Chase Heaths

This area is situated to the east of the district. The wider heath area outside of the district boundary includes the Cannock Chase SAC which is the largest surviving area of lowland heath in Central England and is a priority habitat. The SAC is known to be experiencing pressures associated with visitor numbers and a mitigation strategy is already in place funded by new residential development occurring within an 8km charging zone surrounding the site. This area also contains the Cannock Ext Canal SAC to the east of the district and Stowe Pool and Walk Mill Pit (SSSI) located north of Cheslyn Hay.

Southern Parklands

Situated to the south and west of the district. This area was historically important for its lowland heathland, settlement and farming have resulted in irregular field patterns outlined by ancient hedgerows and veteran oaks. The priority habitat is wood-pasture and parkland. There are a number of SSSIs scattered through this area Big Hyde Rough SSSI and Belvide Reservoir SSSI situated to the east of Brewood and The Wilderness & Vermin Valley SSSI to the west of Kinver which are locally sensitive to the impacts of development and land use change.

Southern Heaths

A small area at the southern end of the district, the area is predominantly agricultural though a substantial amount of lowland heathland and woodland still survives. Lowland heathland is the priority habitat. There are three SSSI's in this area including Kinver edge which is situated adjacent to the south east village boundary.

Local Nature Reserves

- 5.23 Local Nature Reserves (LNRs) are statutorily designated sites primarily designated by local authorities though this responsibility can be delegated to parish and town councils. There are seven Local Nature Reserves within or crossing the boundary with South Staffordshire. A number of these consist of linear corridors travelling through and connecting villages to the wider countryside at Wombourne - South Staffordshire Railway Walk and Wom Brook Walk and Cheslyn Hay - Wyrley and Essington LNR.

Historic Environment and Heritage

- 5.24 South Staffordshire has a rich legacy of historic, buildings and landscapes. The area is characterised by a predominantly dispersed settlement pattern linked with winding lanes. Much of the historic landscape character has been influenced by interlocking large landed estates which originated as medieval manor houses and grew into country estates in the 18th and 19th centuries. Many of the traditional settlements have expanded over time though many maintain historic cores defined by medieval layouts and historic buildings. Significant changes in character have been a notable feature of the former mining settlements in the north east of the District and these are areas of particular importance for industrial archaeology.

National Planning Policy Framework

- 5.25 The NPPF identifies the following requirements in relation to the historic environment;
- Heritage assets...should be conserved in a manner appropriate to their significance (Para 184).
 - Plans should set out a positive strategy for the conservation and enjoyment of the historic environment (Para 185).

- Local planning authorities should identify and assess the particular significance of any heritage assets that may be affected by a proposal...They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage assets conservation and any aspect of the proposal (Para 190).
- When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (Para 193)
- Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss (Para 195).

Historic Environment Character Assessment (2011)

- 5.26 The Historical Environment Character Assessment (HECA) focussed on the historic environment of the thirteen principal settlements within South Staffordshire. Penkridge, Brewood and Kinver are identified as historic towns. These market towns have also been the subject of separate historic character assessments as part of the Extensive Urban Survey undertaken by the county council. The significance of the heritage character of a number of the settlements within South Staffordshire has been reflected in the designation of the historic cores of a number of settlements as conservation areas and the presence within these areas of significant clusters of listed buildings.
- 5.27 The three historic towns have significant core areas identified as conservation areas. In Penkridge there are a total of 46 listed buildings with a significant cluster focussed around the Grade I Listed Church of St Michaels' and All Angels. This area also forms the core of the conservation area which extends to encompass the area around Market Street. This historic core dates to at least the medieval period which has been subsequently surrounded by mid and late 20th century development. The area south of Penkridge incorporates a number of heritage assets including a scheduled moated site and the Staffordshire and Worcestershire Canal and the historic landscape character is well preserved.
- 5.28 The conservation area in Brewood is extensive in relation to the total area of the village and occupies a significant portion of the south west of the village. There are two Grade I listed buildings within the urban area of Brewood – St Mary's and St Chads Church and Speedwell Castle and a total of fifty-two listed structures. The HECA concluded that the greatest sensitivity in terms of the historic environment lie to the south west and south east of Brewood. Specific reference is made to the cluster of building associated with the Grade II Listed Deans Hall Farm situated to the south west of the village. The Shropshire Union Canal which is also designated as a Conservation Area passes along the south west edge of the village.
- 5.29 Kinver has an extensive historic core which is situated adjacent to the Scheduled Iron Age Hill Fort at Kinver Edge which extends over nearly 4 hectares to the south west of the village. A cluster of listed buildings is situated along the High Street which lies at the centre of the extensive conservation area. The Grade I Listed Church of St Peter occupies a prominent location at Church Hill. The HECA notes that the conservation of the historic townscape and the historic buildings is of primary importance. Designated assets are also a key feature of the area around the village, much of the landscape surrounding Kinver retains its distinctive

historic character and significant heritage assets including the Hill Fort and also associations with the iron workings along the River Stour which had their origins in the 17th century. The Stour Valley is also the location of the Staffordshire and Worcestershire canal which is a designated conservation area.

5.30 A number of the historic villages within the district are also rich in heritage features:

Codsall

The medieval street pattern of the historic core is well preserved to the north west of the village around Church Hill. This area is designated as a Conservation Area and contains a number of nationally listed structures including the Grade II* Listed St Nicholas Church. The adjoining areas of countryside retain well preserved historic field patterns and there is a close association with historic core of the settlement. Historic landscape parks are characteristic of the landscape to the west and south associated with small 19th century country houses.

Featherstone

Well preserved historic field pattern to the north. Hilton Park Historic Landscape Area to the east.

Pattingham

There are a total of seventeen listed structures within the village with the greatest interest in the historic core of the village. This area is designated as a Conservation Area. Historic lanes radiating retain much of their rural character with historic farmsteads feature to the south of the village. Historic field patterns are still legible surrounding the village.

Wombourne

Conservation Area covers the historic core of the village and contains a cluster of Listed Buildings. There are a number of heritage assets associated with the Staffordshire and Worcestershire Canal including the Grade II* Water Pumping Station at The Bratch to the north of the village. To the east of the village is the Grade II registered park associated with Himley Hall.

Wheaton Aston

Well preserved piecemeal enclosure surrounding the village, ten listed buildings spread throughout the village with a cluster to the south west within the village conservation area. Canal conservation area adjacent to the north west boundary of the village.

Urban Extension -North of Black Country

There are a number of notable heritage features in this area including the Grade II* Moseley Old Hall to the south west of Featherstone and Grade I Hilton Hall and associated Historic Landscape Area. The Staffordshire and Worcestershire and Shropshire Union Canal Conservation Areas extend northwards from the west midlands conurbation.

Urban Extension – West of Black Country

There are a number of extensive heritage assets in close proximity to the conurbation most notably in the area adjacent to Wombourne at Himley Hall (Grade II*) and the surrounding nationally designated Grade II Himley Hall Park. There are two locally designated Historic Landscape Areas at Wergs and Prestwood. A collection of Scheduled Ancient Monuments associated with the Greensforge Roman Camp is situated in the area between Swindon and Prestwood. The Grade I listed Wightwick Manor is situated adjacent to the boundary within Wolverhampton. Lower Penn to the west of suburb of Penn and Upper Penn and south of

suburb of Penn both include designated Conservation Areas. There is a cluster of listed structures associated with the Wodehouse and Wodehouse Farm situated between Wombourne and Gospel End. The Greensforge Roman Camps are a Scheduled Ancient Monument situated within South Staffordshire to the west of Kingswinford. The Stourbridge canal Conservation Area links Kinver with Stourbridge; the Staffordshire and Worcestershire Canal travel in a north south direction connecting the settlements of Kinver, Swindon and Wombourne.

Urban Extension – East of Cannock

Locally designated Hatherton Historic Landscape Area associated with the Grade II Listed Hatherton Hall.

Urban Extension – South of Stafford

A number of moated sites which are classified as Scheduled Ancient monuments in the fringe area south of Stafford most notably at Hyde Lea and Acton Trussell. The area north of Acton Trussell contains a cluster of listed structures including bridges and farmsteads.

Conclusions

- 5.31 Drawing all of the above together, some summary conclusions can be drawn about how physical and policy constraints may influence decisions on the location of new housing development.

Flooding

- Environment Agency flood warning areas to the north west of Penkridge, west of Coven, east and south-east of Kinver and around Hinksford.
- Narrow flood zones associated with the main river network, fluvial (river) based flood risk is a known issue at Penkridge, Wombourne and Kinver.
- Surface water flooding is a potential issue at Penkridge, Wombourne, Codsall Cheslyn Hay, Great Wyrley and Perton.

Agricultural Land Quality

- The majority of the district is identified as comprising Grade 2 and Grade 3a quality agricultural land.
- Pockets of Grade 1 land are present in areas around Pattingham.

Open Space and Green Infrastructure

- Level of amenity open space provision and natural/semi-natural greenspace generally considered to be good
- Improvements required to the distribution of children's play spaces.
- A needs assessment will be required to ensure adequate provision will be made to accompany new development proposals to meet the requirements of an expanding number of households and a growing population.

Landscape

- Restrictions associated with the Area of Outstanding Natural Beauty will impact on any development proposals along the north-eastern fringe areas of the district. This will most significantly impact on the Tier 2 settlement of Huntington and any proposals for a sustainable urban extension to the west of Cannock.

- Consideration on potential impacts upon identified Historic Landscape Areas (HLA) will be required, notably the five parks and gardens which have been nationally registered. Proposals for a sustainable urban extension north of the Black Country will need to take account of the Hilton HLA. Proposals for a sustainable urban extension to the west of the conurbation will need to take account of Wergs HLA, Himley Grade II listed park and garden and Prestwood HLA.

Natural Environment

- There is one international site within the district (Mottey Meadows) and two within close proximity (Cannock Chase SAC and Cannock Ext Canal SAC). Mottey Meadows is situated to the west of Wheaton Aston. Cannock Chase SAC and the Cannock Ext Canal SAC are known to contain features susceptible to increase pressures associated with visitors and air pollution arising from additional development.
- There are eleven SSSIs within the district, two of which are situated in close proximity to existing settlements, Kinver Edge SSSI is situated adjacent to the south west boundary of the village, and Stowe Pool SSSI is located north of Cheslyn Hay though divorced from the village by the route of the A5.
- Linear Local Nature Reserves connect the settlements of Wombourne and Cheslyn Hay with the wider countryside.

Historic Environment and Heritage

- Consideration will need to be given to the historic character of a number of settlements within the district. The historic market towns of Penkridge, Brewwood and Kinver have a particularly rich resource of heritage features in core areas and this will need to be respected and opportunities sought to provide enhancements were possible.
- The HECA has highlighted that early field patterns are particularly well preserved to the north west of Codsall, around Wheaton Aston, around Brewwood and to the north east of Perton.
- A number of historic villages contain well preserved historic cores reflected in Conservation Area designation and notable clusters of Listed buildings, notably Codsall, Wombourne, Wheaton Aston and Pattingham.
- North of the Black Country includes a number of notable features including Grade II* Moseley Old Hall and Grade I Hilton Hall.
- Numerous heritage designations within western areas in close proximity to Black Country including Historic Landscape Areas at Himley, Prestwood and Wergs; two canal Conservation Areas, a Scheduled Ancient Monument at Greensforge and Conservation Areas at Lower and Upper Penn.
- Grade II listed Hatherton Hall and associated locally designated parkland situated to the west of Cannock.
- Scheduled moated sites and a cluster of listed structures in close proximity to the southern boundary of Stafford.

6. Sustainability Appraisal of the South Staffordshire Local Plan Review – Issues and Options September 2018

6.1 To ensure the Sustainability Appraisal process informs the Local Plan Review from the earliest possible stage, the Council commissioned the Sustainability Appraisal of the South Staffordshire Local Plan Review – Issues and Options September 2018 ('the Sustainability Appraisal'). These included five high-level approaches to the spatial distribution of residential development, which are set out below:

- Scoping Option A: Rural housing growth focused on the district's larger and better connected villages (i.e. Tier 1 and 2 villages)
- Scoping Option B: Rural housing growth dispersed across all settlements with a basic level of service provision within the District (i.e. Tier 1 – 4 settlements)
- Scoping Option C: Small-scale urban extensions on the fringe of neighbouring urban areas
- Scoping Option D: Larger urban extensions on the fringe of neighbouring urban areas (e.g. over 500 dwellings)
- Scoping Option E: New freestanding settlements away from the existing villages/urban areas (e.g. new towns of 10,000 – 15,000 dwellings or garden villages of 1,500 dwellings or more)
- Scoping Option F: Introduce minimum housing densities on all housing sites and intensify development within the existing village development boundaries

6.2 Scoping Options A - F were considered against a number of sustainability indicators to inform subsequent stages of the Local Plan Review. The results of this assessment are summarised below:

Figure 7: Sustainability Appraisal scoring matrices for housing distribution options A-F

| | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 |
|--|-----------------|-----------------|-----------------------------|-----------------------|-------------------|-------------------|---------|--------------------|-------------------|---------------------------|-----------|----------------------|
| | C.C. Mitigation | C.C. Adaptation | Biodiversity & Geodiversity | Landscape & Townscape | Pollution & Waste | Natural Resources | Housing | Health & Wellbeing | Cultural Heritage | Transport & Accessibility | Education | Economy & Employment |
| Residential spatial distribution options | | | | | | | | | | | | |
| A | + | - | - | - | - | - | ++ | + | - | ++ | ++ | ++ |
| B | - | - | - | - | - | - | ++ | - | + | - | - | + |
| C | + | + | - | - | - | - | ++ | ++ | + | ++ | + | + |
| D | + | + | - | - | - | - | ++ | ++ | - | ++ | ++ | ++ |
| E | - | + | - | - | - | - | ++ | ++ | - | ++ | ++ | ++ |
| F | - | - | - | - | - | + | + | - | - | - | - | - |

Source: Sustainability Appraisal of the South Staffordshire Local Plan Review Issues and Options September 2018

6.3 A fuller explanation of the scoring of each option and the criteria which informed it is provided in the Sustainability Appraisal itself. In summary, there are a number of common factors between all options which seek to allocate new land (i.e. Options A-E), rather than simply intensifying existing development boundaries (i.e. Option F). In particular, Options A-E all necessarily involve minor negative effects in terms of biodiversity and geodiversity, landscape and townscape and pollution and waste, whilst causing major negative effects to natural resources (due to the inevitable and irreversible loss of agriculturally and ecologically valuable

soils that results from allocating greenfield land). This is the same across all options and therefore does not help to differentiate between the sustainability of different approaches when considering future directions for growth allocations. Options A-E would all result in major positive impacts in terms of housing, by providing options to meet the District's housing needs.

- 6.4 Whilst there are a number of similarities between Options A – E, there are a number of areas where differences begin to emerge in terms of sustainability indicators. These are summarised by broad development typologies below.

Rural Housing Growth focused on the district's larger and better connected villages (Tier 1 and 2 villages)

| Rural Housing Growth focused on the district's larger and better connected villages (Tier 1 and 2 villages) |
|--|
| <p><i>Major positive effects not held by all options:</i></p> <ul style="list-style-type: none"> • Transport and Accessibility • Education • Economy and Employment |
| <p><i>Minor positive effects not held by all options:</i></p> <ul style="list-style-type: none"> • Climate change mitigation • Health and wellbeing |
| <p><i>Minor negative effects not held by all options:</i></p> <ul style="list-style-type: none"> • Climate change adaptation • Cultural heritage |

- 6.5 The additional major positive effects generated by this option reflect the rail and bus options available in Tier 1 villages (transport and accessibility), the potential for development at Tier 1 villages to access/improve existing education facilities (education) and the access to employment these larger settlements have (economy and employment). Other minor negative effects would also result from climate change mitigation and health and wellbeing factors.
- 6.6 The additional minor negative effects generated by this option reflected the potential for flood risk issues in Tier 1 villages (climate change adaptation) or due to the potential larger scale of development at Tier 1 villages affecting the character of existing Conservation Areas or the setting of listed buildings (cultural heritage). **This option has a high number of major positive effects and relatively few minor negative effects.**

Rural Housing Growth dispersed across all settlements with a basic level of service provision within the District (i.e. Tier 1 – 4 settlements)

| Rural Housing Growth dispersed across all settlements with a basic level of service provision within the District (i.e. Tier 1 – 4 settlements) |
|--|
| <p><i>Minor positive effects not held by all options:</i></p> <ul style="list-style-type: none"> • Cultural heritage • Economy and employment |
| <p><i>Minor negative effects not held by all options:</i></p> <ul style="list-style-type: none"> • Climate change mitigation • Climate change adaptation • Health and wellbeing • Transport and accessibility • Education |

- 6.7 This option does not present any additional major positive effects compared to other options and additional minor positive effects are limited to cultural heritage and economy and employment.
- 6.8 There are a number of additional minor negative effects with this approach due to a number of factors. Firstly, this approach would increase the number of residents outside of the target distance for rail stations (climate change mitigation) and would result in a larger number of smaller sites to be located outside of areas at risk of flooding (climate change mitigation). This strategy would likely increase the portion of residents to locations outside of the target distances to GPs or hospitals (health and wellbeing), would increase the amount of residents reliant on less-frequent bus routes and without rail access (transport and accessibility) and would direct a large portion of residents to locations outside of the target distance of primary and secondary facilities (education).

Small-scale urban extensions on the fringe of neighbouring urban areas

| Small-scale urban extensions on the fringe of neighbouring urban areas |
|--|
| <p><i>Major positive effects not held by all options:</i></p> <ul style="list-style-type: none"> • Transport and Accessibility • Health and wellbeing |
| <p><i>Minor positive effects not held by all options:</i></p> <ul style="list-style-type: none"> • Climate change mitigation • Climate change adaptation • Cultural heritage • Education • Economy and employment |

- 6.9 The additional major positive effects generated by this option reflect the better access to public transport links adjacent to neighbouring urban areas, although rail access is more sparse in the south of the District (transport and accessibility), and also the greater prevalence

of health and leisure facilities in adjacent urban areas (health and wellbeing). A number of minor positive effects are also generated by this approach. **Unlike other options, this approach had no additional minor negative effects and had a number of minor and major positive effects.**

Larger urban extensions on the fringe of neighbouring urban areas (e.g. over 500 dwellings)

| Larger urban extensions on the fringe of neighbouring urban areas (e.g. over 500 dwellings) |
|--|
| <p><i>Major positive effects not held by all options:</i></p> <ul style="list-style-type: none"> • Health and wellbeing • Transport and accessibility • Education • Economy and employment |
| <p><i>Minor positive effects not held by all options:</i></p> <ul style="list-style-type: none"> • Climate change mitigation • Climate change adaptation |
| <p><i>Minor negative effects not held by all options:</i></p> <ul style="list-style-type: none"> • Cultural heritage |

- 6.10 The additional major positive effects generated by this option reflect the better access to public transport links adjacent to neighbouring urban areas, although rail access is more sparse in the south of the District (transport and accessibility), and also the greater prevalence of health and leisure facilities in adjacent urban areas (health and wellbeing). Major positive effects would also result from the proximity to existing education services in adjacent towns and cities and the possibility for larger scale sites to provide new facilities (education). Equally, major positive effects also reflect the proximity of urban extensions to employment centres in neighbouring towns and cities and the potential for employment-led urban extensions to facilitate the meeting of local employment needs (economy and employment). Minor positive effects in terms of climate change also result from this option. Minor negative effects would likely result from the alterations to the setting of heritage assets (cultural heritage). **Of all the options, larger scale urban extensions had the joint largest number of major positive effects and have relatively few minor negative effects.**

New freestanding settlements away from the existing villages/urban areas (e.g. new towns of 10,000 – 15,000 dwellings or garden villages of 1,500 dwellings or more)

| New freestanding settlements away from the existing villages/urban areas (e.g. new towns of 10,000 – 15,000 dwellings or garden villages of 1,500 dwellings or more) |
|--|
| <p><i>Major positive effects not held by all options:</i></p> <ul style="list-style-type: none"> • Health and wellbeing • Transport and accessibility • Education • Economy and employment |
| <p><i>Minor positive effects not held by all options:</i></p> <ul style="list-style-type: none"> • Climate change mitigation |

Minor negative effects not held by all options:

- Climate change mitigation
- Cultural heritage

- 6.11 The additional major positive effects generated by this option reflect the better access to public transport links adjacent to neighbouring urban areas, although rail access is more sparse in the south of the District (transport and accessibility), and also the greater prevalence of health and leisure facilities in adjacent urban areas (health and wellbeing). Major positive effects would also result from the proximity to existing education services in adjacent towns and cities and the possibility for larger scale sites to provide new facilities (education). Equally, major positive effects also reflect the proximity of urban extensions to employment centres in neighbouring towns and cities and the potential for employment-led urban extensions to facilitate the meeting of local employment needs (economy and employment). Minor positive effects in terms of climate change adaptation also result from this option. However, minor negative effects would likely result from the alterations to the setting of heritage assets (cultural heritage) and the net increase in carbon footprint that would result compared to current levels (climate change mitigation). **Of all the options, new settlements had the joint largest number of major positive effects, but also have more minor negative effects than an approach which uses larger urban extensions.**

Conclusions

- 6.12 The Sustainability Appraisal demonstrates a number of points about the sustainability outcomes of different approaches to accommodating future housing growth in the District:
- In terms of accommodating growth in the District's rural villages, more major positive effects and less minor negative effects result from focusing growth on the District's Tier 1 and 2 villages (i.e. the larger and better connected settlements). A larger number of negative minor effects resulted from spreading growth across Tier 1-4 villages.
 - Outside of the villages, larger-scale urban extensions provided the highest number of major positive effects, whilst smaller-scale urban extensions provided the least number of negative effects whilst still providing major positive transport and health and wellbeing effects.
 - New settlements have largely the same sustainability credentials as larger-scale urban extensions, although there are additional minor negative effects in terms of climate change mitigation