

Authority Monitoring Report 2022





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South Staffordshire District Council

Authority Monitoring Report

Executive Summary

This Authority Monitoring Report (AMR) has been prepared in relation to the requirements of Section 35, Planning and Compulsory Purchase Act 2004 (as amended) and Section 113, Town and Country Planning (Local Planning) (England) Regulations 2012. The report covers the period 1 April 2021 to 31 March 2022 and has twin objectives; setting out the progress that has been made on the preparation of the South Staffordshire Local Plan, and the progress towards meeting targets and milestones set out in the Local Development Scheme (LDS). Where relevant and appropriate, as the last published AMR covered up to 31 March 2018, this document also provides an overview of strategic planning progress within the intervening years (i.e. 2018/19, 2019/20 and 2020/21).

It is the responsibility of the Local Planning Authority (LPA) to monitor its own performance against the requirements adopted through the Core Strategy (2012) and monitor allocated sites in the Site Allocations Document (2018) (SAD). As such, despite this AMR sitting within the context of the LDS including the existing Core Strategy and SAD – many of the sites referenced in this document are allocated in these – the production of this document is to inform the preparation of the ongoing Local Plan review by supporting the most up to date housing and employment land availability within the district. It also provides an update to the quantum of gypsy and traveller pitches in South Staffordshire.

In these respects, the monitoring report also sets out details of progress regarding Duty to Cooperate, Self Build and Custom Build, Neighbourhood Plans, Development Orders and other relevant Local Plan evidence base documents prepared during the year.

Availability of Documents and Keeping in Touch

If you require further advice about the local planning system or the Authority Monitoring Report, please contact us. This AMR and all studies and evidence base documents (including the Core Strategy and Site Allocations Document) are available on the Council's website at Local Plans | South Staffordshire District Council (sstaffs.gov.uk).

To keep up to date with the progress of the preparation of the Local Plan review, and other strategic planning consultations, please use our bespoke consultation system at sstaffs.oc2.uk.

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1.0 Introduction

- 1.1 Whilst there is no requirement for AMRs to be submitted to the Secretary of State, it remains the statutory duty through Section 35 of the Planning and Compulsory Purchase Act 2004 for Local Planning Authorities (LPA) to monitor their own performance by publishing an Annual Monitoring Report. This was amended by Section 113 of the Localism Act 2011 where Annual Monitoring Reports were replaced by Authority Monitoring Reports (AMR).
- 1.2 Although LPAs still have discretion as to which targets and indicators to include in the AMR, they must be consistent with relevant UK legislation and National Planning Policy and conform to certain prescriptions set out in Part 8 of the Town and Country Planning (Local Planning) (England) Regulations 2012 which set out the minimum requirements for the contents of the report. The full monitoring requirements are established through the adoption of the 2012 South Staffordshire Core Strategy ("Core Strategy") and monitor the delivery of allocated sites in the 2018 Site Allocations Document (SAD).
- 1.3 This is the Authority Monitoring Report (AMR) covering the period 1 April 2021 to 31 March 2022, produced under the most recent regulations. As per legislation, it includes reporting on the implementation of the Local Development Scheme (LDS), the extent to which policies set out in in the Local Plan/Core Strategy are being achieved (including performance against housing delivery targets), the progress of Supplementary Planning Documents (SPDs), the progress of any neighbourhood planning, any Community Infrastructure Levy (CIL) proposals, and the steps taken under the Duty to Cooperate (DtC).

2.0 Purpose of the Authority Monitoring Report

- 2.1 Review and monitoring are key aspects of the Government's plan, monitor and manage approach to the planning system; in particular the delivery of housing provision. Monitoring enables the authority to see how effective the policies in its Plan are and highlights areas for change or review. The AMR also enables stakeholders and communities to see how the Plan is performing and to see the progress made in relation to the wider aspects of forward planning. The detailed requirements are set out in Regulation 34 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 2.2 Nevertheless, the primary purpose of this document is to share an overview of the performance of the planning service in delivering and supplying primarily housing and employment sites, but also traveller pitches. As such, this document has been prepared to meet the requirements of the necessary Acts and Regulations by providing an update to represent the most significant changes/development experienced within South Staffordshire district during the most recent monitoring year. Where relevant, some information has been included which is more up to date (post March 2022) in order to provide context. Due to the last AMR being published

in 2018, this particular publication not only covers the most recent monitoring year of 1 April 2020 to 31 March 2021, but also provides brief updates to cover the monitoring years 2018/19 and 2019/20 in between.

3.0 National Planning Context

- 3.1 The <u>National Planning Policy Framework</u> (NPPF) sets out the Government's planning policies for England and was first published in March 2012. The framework acts as guidance for local planning authorities and decision-takers, both in drawing up plans and making decisions about planning applications. The Government revises the NPPF, with the most recent version being published on 20 July 2021.
- 3.2 <u>Planning Practice Guidance</u> (PPG) supports the NPPF with more detailed, accessible and technical guidance which is updated regularly.
- 3.3 The <u>Town and Country Planning (Local Planning) (England) Regulations 2012</u> is the statutory instrument establishing the requirements for LPAs to produce Local Plans, Supplementary Planning Documents, the Authority Monitoring Report, and the Duty to Cooperate.

4.0 <u>Local Planning Context</u>

- 4.1 The <u>Local Development Scheme</u> (LDS) is a timetable of proposed stages of production of planning policy documents and was reviewed and updated in June 2020 to accompany the Local Plan review. For more detailed progress on the documents against the milestones contained in the LDS, please use the council's website.
- 4.2 The council adopted an updated <u>Statement of Community Involvement</u> (SCI) in September 2019 to reflect changes to legislation and guidance. As a statutory document to produce under Section 18 of the Planning and Compulsory Purchase Act (2004), it establishes how both strategic planning and development management will consult on both local planning documents and planning applications.
- 4.3 The Localism Act sets out how communities can be more involved in planning for their areas, by creating plans and policies to guide new development through a Neighbourhood Plan. A parish council can assume this responsibility. Once a neighbourhood plan has been through the statutory process and is adopted, it forms part of the development plan for an area.
- 4.4 At March 2022, South Staffordshire had four parish councils as designated Neighbourhood Plan Areas, these being; Codsall Parish Council (April 2020), Kinver Parish Council (September 2020), Bilbrook Parish Council (June 2021), and Penkridge Parish Council (January 2022).
- 4.5 No Neighbourhood Development Orders have been applied for or put in place since the previous AMR publication in 2018.

- 4.6 Amendments to the Community Infrastructure Levy (CIL) Regulations 2010 in September 2019 set out the government's new requirement for LPAs to publish an annual <u>Infrastructure Funding Statement</u> (IFS) illustrating the collection of Section 106 monies and CIL contributions. As the council have not adopted a CIL, infrastructure is solely funded via S106 agreements.
- 4.7 The most recent IFS for the district covering the financial year 2021/22 illustrates that £207,356.66 was collected in S106 contributions. A further £103,357 has been secured through planning obligations entered into in 2021/22, whilst during the year, the authority has spent £488,650 of contributions upon; Cannock Chase SAC, affordable housing, 4G sports pitch, and a volunteering scheme.

Local Planning Documents

4.8 Since the publication of the previous AMR, the council has consulted upon an updated Affordable Housing and Housing Mix Supplementary Planning Document (SPD). The intention of the document is to set out guidance for the implementation of the Core Strategy policies relating to the delivery of affordable housing and housing mix. As such, the SPD contains the Council's preferred approach to the delivery of affordable housing, housing mix, and older persons accommodation. Having considered responses to the consultation and progress with the council's Local Plan review, a revised draft will now be produced to accord with the housing policies in the new Local Plan. A public consultation on this revised draft will be held in due course.

Local Plan Review

- 4.9 A review of the Core Strategy and SAD, and production of a new Local Plan, was committed to as part of the SAD adoption process (see Policy SAD1). Ultimately, this will supersede the twin elements of the strategic planning framework for the district (Core Strategy and SAD), with a refreshed evidence base.
- 4.10 It is proposed that the 'new' Local Plan will be prepared, examined, and adopted by winter 2023. In order to achieve this, since the last publication of the AMR, the council has published and consulted on an initial Issues and Options Local Plan (October/November 2018) and a Spatial Housing Strategy & Infrastructure Delivery paper (October-December 2019). Of which the outcomes of both help to inform the Regulation 18 Preferred Options Local Plan.

Main Stages		Date
	 Identification of main planning issues for th 	e 2016-
	district.	present
Evidence Gathering	 Development of Strategy Options 	
Evidence dathering	Call for Sites	
	• SHMA	
	 Sustainability Appraisal (SA) Scoping Report 	

Issues and Options	 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	 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	 Public consultation on the Council's preferred options for sites and policy direction of travel Draft SA Report 	November 2021
Publication Plan	 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	 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	Council formally adopts Local PlanSA Adoption Statement	Estimated Winter 2023
Monitoring and Review	 Each year, identified targets and planning applications are monitored to assess delivery of the Local Plan 	Ongoing

Table 1: Stages of Plan-making (taken from Regulation 18 Preferred Options Plan).

- 4.11 The Regulation 18 Preferred Options consultation was undertaken between 1 November 2021 until 13 December 2021. This document establishes proposed sites to be allocated for housing, employment, and Gypsy and Traveller pitches, to deliver the level of development to meet identified needs. It also sought comments in relation to the development strategy, additional infrastructure requirements, site specific policies, and indicatively presented development management policies.
- 4.12 All comments submitted were reviewed in order to inform the next step of the plan preparation process: updating the Preferred Options plan to reflect the additional evidence received, and produce the Publication Plan document which will form the

- basis of submission to the Secretary of State in due course following its own (Regulation 19) consultation.
- 4.13 Until the new/emerging Local Plan is adopted by the council as a replacement, the existing Core Strategy and SAD are still used as the basis for determining planning applications.

Evidence Base

- 4.14 To support the production of the Local Plan, a suite of studies, assessments and background documents are being, or have been, prepared to underpin the preparation of policies.
- 4.15 Due to undertaking the Local Plan review, SSDC has produced and/or commissioned a number of documents to inform the preparation of the Local Plan. The following list provides the most up to date position of the evidence base, showing documents published between April 2018 and March 2022. There are documents produced prior to this.
 - Strategic Assessment for Provision of Swimming Pools (2019) produced by Sport England.
 - Infrastructure Delivery Plan (2019).
 - Strategic Housing Land Availability Assessment (2021).
 - Economic Development Needs Assessment Part (2018) and Part II (2020) produced by Warwick Economics and Development.
 - Habitat Regulations Assessment Review (2018).
 - South Staffordshire Local Plan Review Sustainability Appraisal (2019) produced by Lepus Consulting.
 - Historic Environment Site Assessment Stage I Assessment Report (2019) and Sites Update (2020) – produced by AOC Archaeology Group.
 - South Staffordshire Council Housing and Homelessness Strategy (2018).
 - Indoor Sports Facilities Strategy Repot (2020) and Needs Assessment (2020) by Knight, Kavanagh, and Page Ltd.
 - Open Space Audit Assessment Report (2019) and Standards Paper (2020) by Knight, Kavanagh, and Page Ltd.
 - Playing Pitch Strategy (2020) by Knight, Kavanagh, and Page Ltd.
 - Strategy and Action Plan by Knight, Kavanagh, and Page Ltd.
 - South Staffordshire Housing Market Assessment (2021) by HDH Planning and Development Ltd.
 - Viability Assessment, Stage 1 Report (2021) by Dixon Searle Partnership.

Duty to Cooperate

4.16 The Duty to Cooperate was introduced through the Localism Act 2011, with Section 110 of the Act requiring councils and public bodies to 'engage constructively, actively and on an ongoing basis in the preparation of Local Plan documents, including in the

preparation of evidence to underpin these documents. The council is also required to demonstrate joint working with prescribed bodies as set out in Part 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The Localism Act also requires Local Planning Authorities to have regard to the activities of certain groups, organisations and adjoining authorities.

- 4.17 The council has continued to engage with appropriate bodies, local planning authorities, stakeholders and partner organisations throughout the preparation and updating of our Local Plan review and evidence base preparation. A Duty to Cooperate Topic Paper was issued by the Council in November 2021 and has subsequently been updated to reaffirm this commitment by setting out how strategic issues have been addressed to date, acknowledging where further work is required and the actions proposed to meet this, and address issues involved.
- 4.18 At 31 March 2022, the Council had signed two Statements of Common Ground (SoCG) with Solihull Metropolitan Borough Council (18th May 2021) and Shropshire County Council (26th May 2021). In the same timeframe, SSDC has not entered into any Memorandums of Understanding (MoU) but will continue to work with Duty to Cooperate partners and site promoters in preparing SoCGs to support the district's Local Plan review on relevant strategic cross boundary matters, including employment and housing provision.
- 4.20 Over and above SoCGs and MoUs, LPAs are expected to commission joint evidence to address cross-boundary matters to ensure policies and development is coordinated. In this regard, SSDC has prepared the following documents which form part of the evidence base (and further to those listed in paragraph 4.17) to the Local Plan with other stakeholders:
 - South Staffordshire Green Belt Study 2019 produced with the input of neighbouring LPAs and other statutory bodies.
 - Greater Birmingham HMA Strategic Growth Study 2018 commissioned by Greater Birmingham and Black Country Housing Market Area (GBBCHMA).
 - South Staffordshire Landscape Sensitivity Assessment 2019 produced alongside Black Country assessment, as commissioned by relevant LPAs.
 - Climate Change Adaption and Mitigation Report 2020 commissioned by Staffordshire County Council and its constituent authorities.
 - Strategic Flood Risk Assessment 2019 commissioned by southern
 Staffordshire LPAs including SSDC, Stafford Borough Council, Cannock Chase
 District Council, Lichfield District Council, and Tamworth Borough Council.
 - Water Cycle Phase 1 Scoping Study commissioned by southern Staffordshire LPAs including SSDC, Stafford Borough Council, Cannock Chase District Council, Lichfield District Council, and Tamworth Borough Council.
 - ROF Featherstone Option Assessment Framework Report (2018) commissioned by Staffordshire County Council.
 - The Cannock Chase Special Area of Conservation (SAC) Strategic Access Management and Monitoring Measures Detailed Implementation Plan (2020)

commissioned by Cannock Chase Special Area of Conservation (SAC)
 Partnership.

5.0 **Monitoring Information**

- 5.1 Both the Core Strategy and the SAD contain separate monitoring frameworks. For the purposes of this document, only a select number of monitoring indicators from both have been reviewed here. This is due to resource and applicability reasons; as firstly this document has been produced to inform the submission of the Publication Plan, whilst secondly, a number of the indicators are now defunct in policy terms and are to be superseded by an updated monitoring framework to accompany the Local Plan review.
- 5.2 In short, it is considered, at this stage, only necessary to provide an update to the outcome and performance against key residential (including Gypsy, Traveller, and Show-persons accommodation) and employment policies. These include:
 - Core Strategy, Core Policy 6 Housing Delivery.
 - Core Strategy, Policy H1 Achieving a Balanced Housing Market.
 - Core Strategy, Policy H2 Provision of Affordable Housing.
 - Core Strategy Policy H3 Affordable Housing Rural Exception Sites.
 - Core Strategy Policy H4 Delivery Affordable Housing.
 - Core Strategy Policy H5 Specialist Housing Accommodation.
 - Core Strategy Policy H6 Gypsies, Travellers and Travelling Show-people.
 - SAD Policy SAD2 The Housing Allocations.
 - SAD Policy SAD3 Safeguarded Land for Longer Term Development Needs.
 - SAD Policy SAD4 Gypsy and Traveller Pitch Provision.
 - Core Strategy Policy EV1 Retention of Existing Employment Sites.
 - Core Strategy Policy EV5 Rural Employment.
 - SAD Policy SAD5 Employment Land Allocations.

6.0 Residential Monitoring

Housing Requirement and Completions

- 6.1 The council has a housing requirement in the adopted Core Strategy of 3,850 net dwellings for the plan period 2006 2028 (or 175 dwellings per annum). However, as this housing requirement is older than 5 years since adoption, the authority's local housing need figure is calculated using the government's nationally set standard methodology. For South Staffordshire, this currently calculates a local housing need figure of 241 dwellings per annum¹.
- 6.2 Between April 2018 and March 2022, there has been a total of 1,278 net completions in the district. During 2021/22, there were 530 net completions alone. Overall, since 2018, there has been a total of 1,278 net dwellings completed; this indicates an oversupply of 22% when compared to the annualised standard methodology requirements year-on-year (which has superseded the Core Strategy target of 175 per annum). Across the plan period (2012 2022), the authority has regularly exceeded its housing requirement, and it is therefore considered that the delivery mechanisms in both the Core Strategy and SAD have delivered and continue to do so.

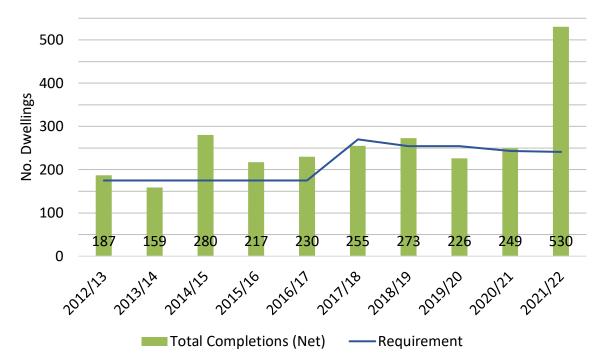


Figure 1: SSDC annualised housing completions 2012 to 2022.

6.3 This is supported by the fact that the council can demonstrate a 5.9 year housing land supply position. The calculation of this is set out in more detail in the Housing Land Supply Statement 2021 – 2022¹.

¹ Land Registers & Housing Land Supply (sstaffs.gov.uk)

Housing Trajectory and Projections

- 6.4 There were 593 dwellings under construction at 31 March 2022, and the remaining housing supply with extant permission is split between those sites that have not started, and the remaining capacity on sites which are already under construction. In total, there were 836 dwellings benefit from planning permission. Where possible, these are net figures and as such replacement dwellings and other losses have been counted. Moreover, as set out in the Five Year Housing Land Supply Statement, various considerations are factored in to providing the most accurate representation of projected forward completions. These include; non-implementation rates, housebuilder attachment, and windfall units.
- 6.5 By projecting forward the anticipated delivery rates of sites; with extant planning permissions, under construction, or with an outstanding allocation, the council is confident that it will be able to demonstrate a 5-year housing land supply in the coming years. Sites included in the Local Plan currently being prepared by the council should assist in increasing projected delivery rates in the medium-term and are not included in Figure 2 below. Full details of the council's housing supply position can be found in Appendices 1 and 2 of the Five Year Housing Land Supply Statement 2021 2022.

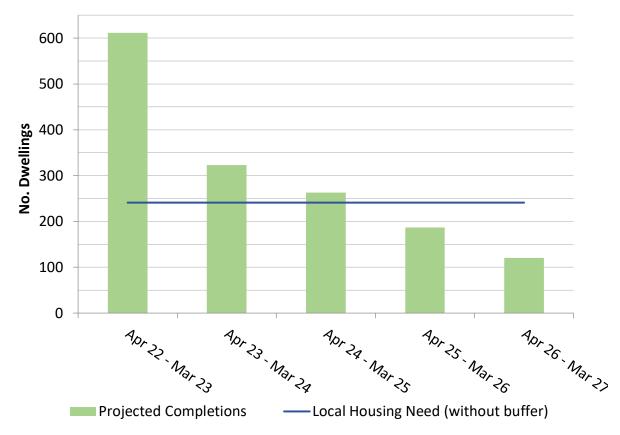


Figure 2: SSDC projected annualised housing completions 2022 to 2027².

² Local Plan Review allocations are not included.

- 6.6 Of the 19 sites allocated in the SAD, 14 are progressing development. To date, these have provided 647 completed dwellings in the district, with a further 600 permitted. All but one have over delivered by an average of 40%.
- 6.7 There is a total outstanding capacity of a minimum 125 units on allocated SAD sites at; Histons Hill, Codsall, 154a Walsall Road, Great Wyrley, Pool View, Great Wyrley, Landywood Lane, Great Wyrley, and Himley Lane, Swindon. Only one of the Safeguarded Land sites in the SAD has been granted planning permission; Hobnock Road, Essington was granted planning permission at the same time as the SAD was adopted in 2018. This site has an outstanding capacity of 102 units having completed approximately 55%.

Ref.	Site Name/Location	Allocated Capacity	Comp.	U.C.	N.S.
443	Land off Pendeford Mill Lane, Bilbrook	102	101	63	0
228	Former Adult Training Centre, Histons Hill, Codsall*	20	0	0	0
223	Land at Watery Lane, Codsall	160	180	0	0
406	Land at Keepers Lane, Codsall	50	9	25	31
54	Land at Engleton Lane, Brewood	53	48	25	0
119	Land off Saredon Road, Cheslyn Hay	63	0	39	21
141	Land at 154a Walsall Road, Great Wyrley*	25	0	0	0
139	Land at Pool View, Great Wyrley*	35	0	0	0
136	Land at Landywood Lane, Great Wyrley*	35	0	0	0
86	Land west of School Lane, Coven	40	63	0	0
168	Land at Brinsford Lodge, Featherstone	60	7	60	14
270	Land off Hyde Lane, Kinver	30	32	13	0
274	Land south of White Hill, Kinver	30	0	0	40
239	Land west of Wrottesley Park Road (south), Perton	163	0	0	220
313	Land off Himley Lane (south), Swindon*	10	0	0	0
379	Land east of Ivetsey Road, Wheaton Aston	15	13	18	1
281a	Land off Ounsdale Road (south), Wombourne	19	13	18	1
302	Land north of Beggars Bush Lane, Wombourne	80	79	11	0
283	Land north of Bridgnorth Road, Wombourne	80	102	0	0

^{*}No permission granted.

Table 2: Progress of SAD Housing Allocations (Policy SAD2).

Affordable Housing

6.8 Paragraph 65 of the NPPF establishes that it is a requirement for all major housing developments to include a minimum starting point of 10% of properties for affordable home ownership as part of the overall affordable housing contribution. This supersedes the requirements of Policy H2 of the Core Strategy. However, the Core Strategy does establish the tenure split of affordable products as 50:50 between social rent and intermediate tenures. In 2021, the government introduced a new product, First Homes³, which will form a compulsory part of affordable housing

³ First Homes - GOV.UK (www.gov.uk)

contributions as discounted market tenure. As such, the council's new affordable provision is: 50% social rent, 25% intermediate ownership, 25% first homes. To date, there has been no delivery specifically of first homes.

6.9 A total of 212 affordable housing units were completed in 2021/22. This comprises nearly a 50:50 split between rental and shared ownership tenures; a trend which has been consistent in the last couple of years. The predominant mechanism for the delivery of affordable housing products in this monitoring year has been through Section 106 agreements on large/major sites at: Ivetsey Road, Wheaton Aston, Hobnock Road, Essington, The Burgesses, Kinver, Hyde Lane, Kinver, Beggars Bush Lane, Wombourne, Pendeford Mill Lane, Bilbrook, Bridgnorth Road, Wombourne, Engleton Lane, Brewood, and Stafford Road, Penkridge.

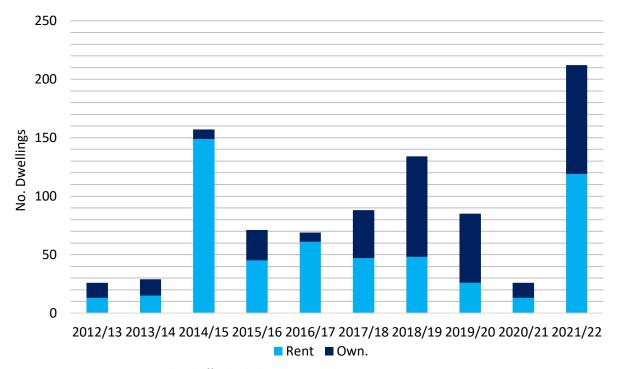


Figure 3: SSDC annualised affordable housing completions 2012 to 2022.

- 6.10 Net affordable completions between 2012 and 2022 amount to 897 dwellings which has exceeded the Core Strategy target of 644 units of affordable homes. The council continues to consider that it will provide a required level of delivery through 342 affordable units with either extant planning permission (150) or under construction (192) at 31 March 2022. These are largely on the same large sites as above, as only 29 affordable dwellings were granted permission in 2021/22. This does however include a number of housing association garage sites in Cheslyn Hay and Great Wyrley providing small 100% affordable schemes (all not started). The 2 Rural Exception Sites approved in 2020/21 at Shop Lane, Oaken, and Common Lane Bednall are both still extant.
- 6.11 Sites included in the Local Plan currently being prepared by the council which will include affordable housing contributions in the medium-term and are not included in Figure 4 overleaf.

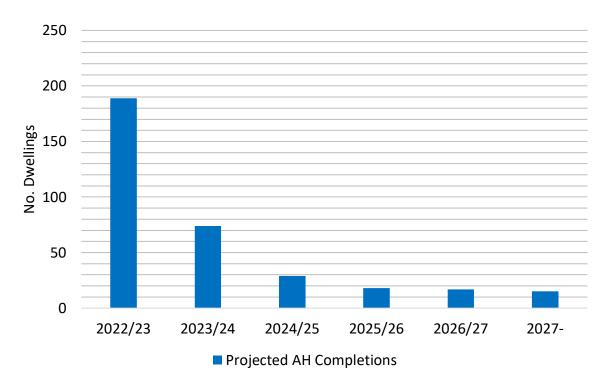


Figure 4: SSDC projected annualised affordable housing completions 2022 to 2027 onwards.

Extra Care

6.12 There are currently 2 planning applications delivering C2 Extra Care accommodation. These are at Ounsdale Road, Wombourne (x34 C3 dwellings equivalent under construction), and Wolverhampton Road, Codsall (x15 C3 dwellings equivalent not started). There have been no completions in the current monitoring year. Since 2018, the only C2 scheme to be completed was at Baggeridge Brickworks, Gospel End as a 66 bed apartment building for the elderly.

Self and Custom Build

- 6.13 The <u>Self-build and Custom Housebuilding Act 2015</u> places a duty on local authorities to keep a register of people who have expressed an interest in developing land for self-build and custom-build projects. Policy SAD9 establishes a requirement for having regard to the Self-Buil Register when in order to facilitate the delivery of Self and Custom Build (SCB) properties. This is reflective of the current national planning policy position.
- 6.14 At 31 March 2022, there were a total of 31 individual entries on the SCB Register, and 0 group entries. This equates to an additional 21 individual entries onto the register since 2018. Over the same period, 28 plots have been approved which qualify as self and/or custom build. The council is confident that it has met the legislative requirements of the <u>Self-build and Custom Housebuilding Act 2015</u> to permission the equivalent number of plots suitable for SCB over a rolling 3 year

period. This is because the council has consistently delivered enough plots to meet need barring the first year of the rolling period coming into effect.

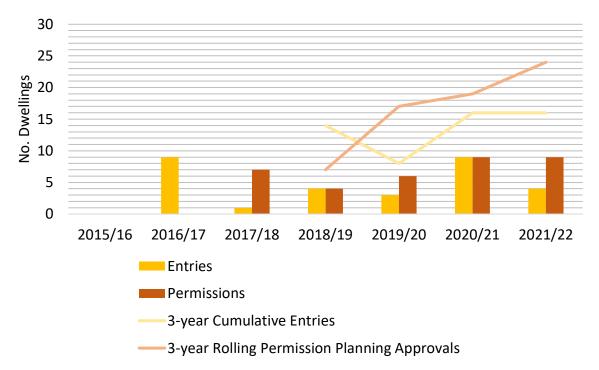


Figure 5: SSDC annualised Self and Custom Build delivery and requirement.

Gypsy and Traveller Pitches

6.15 As set out in Policy H6 of the Core Strategy, the council has a Gypsy and Traveller pitch requirement of 53 residential pitches between 2012 and 2028. This need has been updated by the Gypsy and Traveller Accommodation Assessment (GTAA) (2021) prepared as part of the ongoing local plan preparation evidence base. This work updated the need figure to 121 pitches between 2021 and 2038, with an immediate 5-year requirement of 72 pitches. However, despite this being the latest evidence on traveller needs, it has yet to be examined and found sound.

South Staffordshire Permanent Residential Gypsy Pitches											
	07- 12	12/ 13	13/ 14	14/ 15	15/ 16	16/ 17	17/ 18	18/ 19	19/ 20	20/ 21	21/ 22
Requirement	32	4	4	4	4	4	3	3	3	3	3
Cumulative Requirement	32	36	40	44	48	52	55	58	61	64	67
Permanent Permissions	41	5	0	2	15	2	0	2	3	4	0*
Cumulative Permissions	41	46	46	48	63	65	65	67	70	74	74

Residual	.0	.10	+6	+4	.15	+13	+10	+9	+19	.10	.7
Requirement +/-	+9	+10	+0	+4	+12	+13	+10	+9	+19	+10	+/

Table 3: SSDC annualsied Gypsy pitch requirements and permissions 2007 to 2022.

^{*}See paragraph 6.16.

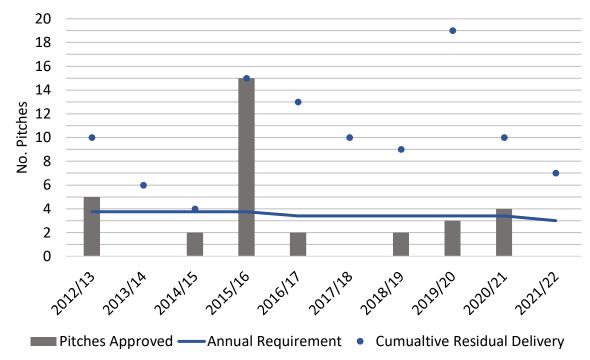


Figure 6: SSDC annualised Gypsy pitch delivery 2012 to 2022.

- 6.16 Although on an annualised basis, the authority has sometimes failed to meet the required number of plots, the significant approval of pitches in 2015/16 means that overall, the council has permissioned 33 pitches since 2012 versus a 35 pitch requirement over the same period. The over-provision of pitches pre-2012 means that there has been an over-delivery of 7 pitches to date. *The reason that there have been no permissions in 2021/22 is due to the nature of approvals frequently being via the appeal process. Therefore, approvals are often back-dated.
- 6.17 With regards to Policy SAD4, despite the policy allocating 20 additional pitches at March 2022, only 5 allocated pitches had been approved which could contribute towards the pitch requirement of the district. Many of the allocations have had permission granted for temporary pitches, but some of these have lapsed and are therefore considered unauthorised with a requirement to be regularised.

	SAD4 Sites	Allocation	Progress
GT02	High House, Poplar Lane, Hatherton,	1 temporary pitch	Regularisation not
	WS11 1RS	to permanent.	come forward.
GT03	New Stables, Poplar Lane, Hatherton,	2 additional	Not come forward.
	WS11 1NQ	pitches.	
GT05	Granary Cottage, Dark Lane, Slade	2 additional	Not come forward.
	Heath,	pitches.	

GT06	The Spinney, Old Stafford Road, Slade Heath, WV10 7PH	1 additional pitch.	Not come forward.
GT07	The Bungalow Rockbank, Brewood Road, Brewood, WV9 5BN	2 additional pitches.	2 pitches approved.
GT08	Brinsford Bridge, A449 Stafford Road, Coven Heath, WV10 7PS	1 additional pitch.	Not come forward.
GT13	Hospital Lane, Cheslyn Hay, WS6 7HZ	2 additional pitches.	Not come forward.
GT14	Brickyard Cottage, A462 Bursnips Road, Essington, WV11 2RE	2 additional pitches.	2 pitches approved
GT17	The Stables, Old Landywood Lane, Great Wyrley, WV11 2AP	2 additional pitches.	Not come forward.
GT18	Poolhouse Road, Wombourne, WV5 8AZ	1 temporary pitch to permanent, and 1 additional pitch.	Regularisation and application not come forward.
GT20	Horden Lodge/Park, Ball Lane, Slade Heath, WV10 7HD	1 additional pitch.	Additional pitch approved.
GT23	Glenside, Dark Lane, Slade Heath, WV10 7PN	2 additional pitches.	Not come forward.

Table 4: Progress of SAD Gypsy and Traveller Pitch Allocations (SAD4).

7.0 Employment Monitoring

Employment Land Position

- 7.1 The council does not have an adopted employment land requirement. Rather than establish a quantum of development, and identify suitable allocations to meet this, Core Policy 7 of the Core Strategy (CS) seeks to provide the principle of employment land development towards the existing strategic employment sites within the district, and following those, other allocated/established (non-strategic) employment sites as identified in the SAD. Small-scale local employment opportunities are also supported within appropriate locations withing Main Service Villages, Local Service Villages, and Small Service Villages. There is also indicative support for appropriate employment uses that support the rural economy.
- 7.2 Nevertheless, during 2018, the council updated its evidence base pertaining to employment land requirements through an Economic Development Needs Assessment (EDNA). Through the application of an evidenced based growth scenario, it identified a requirement for the emerging Local Plan to deliver 86ha of employment land to meet the needs of the district. There has been a further updated EDNA produced in June 2022. However, as this is outside of the date range of this document, it will be covered in a subsequent AMR.
- 7.3 The table below shows the amount of land available for employment use at 31 March 2022. For monitoring purposes, the employment land portfolio only refers strictly to developable land that is available and not employment sites that contain vacant units. Furthermore, for the avoidance of doubt, this section refers to Class B uses as laid out in the Town and Country Planning (Use Classes) Order (as amended). Where appropriate B1 (Business) use is recorded and monitored. This is despite being revoked in September 2020¹ and reassigned as Class E(g) within Commercial, Business and Service use. Nevertheless, this is only the case for explicit office use, and not ancillary office space.

Site Name	Available Land (Ha)
Strategic Employment Sites	
Four Ashes, Brewood & Coven	0.0
Hilton Cross, Featherstone	*4.8
ROF Featherstone, Featherstone	36.0
West Midlands Interchange (WMI), Penkridge	297.0
i54, Bilbrook	4.8
i54 (Western Extension), Bilbrook	**40.0
Non-Strategic Employment Sites	
Acton Gate, Dunston	0.0
Acton Plaza, Dunston	0.8
Balliol Business Park, Bilbrook	0.0
Coppice Lane, Cheslyn Hay	0.0

¹ The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 (legislation.gov.uk)

Dunatan Business Village Dunatan	0.0
Dunston Business Village, Dunston	0.0
Essington Light Industrial Estate, Essington	0.0
GE Aviation, Bilbrook	0.0
Hawkins Drive Industrial Estate, Cheslyn Hay	0.0
Heathmill Road Industrial Estate, Wombourne	0.0
Hepworth Site, Essington	0.0
Hilton Main Industrial Estate, Featherstone	0.0
Hobnock Road, Essington	5.2
Huntington Industrial Estate, Huntington	0.0
Kingswood Business Park, Perton	0.0
Landywood Enterprise Park, Great Wyrley	0.0
Landywood Lane Industrial Estate, Cheslyn Hay	0.0
Littleton Business Park, Huntington	0.0
(Former) Loades PLC., Great Wyrley	0.0
(Former) Ounsdale Road Industrial Estate, Wombourne***	-
Paradise Lane, Featherstone	0.0
(Former) Sandvik, Featherstone	0.0
Smestow Bridge Industrial Estate, Wombourne	0.0
Wolverhampton Business Airport, Bobbington	0.0
Wombourne Enterprise Park, Wombourne	0.0
Vernon Park, Hilton	2.8
Total	346.6
Less WMI	49.6

^{*}Entirety of land benefits from planning permission (either extant or under construction).

Table 5: Progress of identified, allocated, and strategic employment sites.

- 7.4 Of all the identified employment sites, there is a total of 346.6ha of employment land available for development. This reduces to 49.6ha if the significant proportion of that at WMI is factored away. Whilst WMI does benefit from a Nationally Significant Infrastructure Project (NSIP) Development Consent Order (DCO) approved on 4 May 2020², it is not an employment allocation in the CS or SAD.
- 7.5 All the sites in the above table (with the exception of WMI) are included within paragraph 9.4 of the SAD as an identified employment land supply; this includes Ounsdale Road Industrial Estate, Wombourne. However, in February and July 2019³ respectively, full planning permission was granted to remove the industrial units for redevelopment as residential use. As such, the site is no longer included in employment land supply.

^{**}Part of land benefits from planning permission (either extant or under construction).

^{***}Site has been permanently lost from employment use. See paragraph 7.5.

² West Midlands Interchange | National Infrastructure Planning (planninginspectorate.gov.uk)

³ 18/00432/FUL and 18/00831/FUL

Employment Land Position

7.6 During 2021/22 a total of 2.7ha (net) delivering 9,976m² (gross) of employment land was completed. Naturally, this delivery has been across various use classes, and in some cases a combination of. As noted in paragraph 7.3, for the purposes of this report, the old B1 use continues to be identified. For expediency, where appropriate, the uses have been combined to reflect the type of operations as indicated below:

Use Class	Type of Business Operations		
B1(a) + B1(b)	Offices/Research		
B1(c) + B2	Industrial		
B8	Storage/Distribution		

- 7.7 The predominant employment use to be delivered is within the industrial sector with 5% of total floospace completions across the year being within B1(c) or B2 use. A significant proportion of this was completed at Heathmill Road Industrial Estate, Wombourne, for Prime Oak⁴ (3,695m²/1ha). Although a not insignificant quantum was also delivered at Unit 4E, Four Ashes⁵ (1275m²/0.24ha).
- 7.8 56% of all gross floorspace delivered was within an identified employment location within the Core Strategy: 388m² (0.58ha) at Hawkins Drive Industrial Estate, Cheslyn Hay, 1,275m² (0.24ha) at Four Ashes, and 3,965m² (1.0ha) at Heathmill Road, Wombourne; all of which providing the entirely of B2 delivery for the year.
- 7.9 In addition, a sizeable quantum of floorspace for a combination of B1(a) and B8 was completed. This amounted to 26% of total floorspace delivered over the year. Although this was predominantly due to the retrospective application of change of use from agricultural/equestrian use to employment at New Road Farm, Swindon⁶. *All completed on Strategic Employment Sites.

⁴ 19/00990/FUL

⁵ 19/00775/FUL

^{6 20/01130/}COL

		2021/22 Employment Land Completions			
		Gains	Losses	∐a /po+\	
		Sq.m. (Gross)	Sq.M (Gross)	Ha (net)	
Offices/Research	B1(a)	55	-702	-0.14	
Offices/Research	B1(b)	0	0	0	
	B1(c)	250	0	0.17	
Industrial	*B2	5628	0	1.82	
	B1(c)/B2	0	0	0	
Storage/Distribution	B8	944	-109	0.16	
Offices/Research +	B1(a)/B2	0	0	0	
Industrial	B1(b)/B2	0	0	0	
Offices/Research +	B1(a)/B8	2634	0	0.3	
Storage/Distribution	B1(b)/B8	0	0	0	
Industrial +	B1(c)/B8	0	0	0	
Storage/Distribution	B2/B8	465	0	0.05	
All	B1/B2/B8	0	0	0	
	Total	9,976	-811	2.36	

Table 6: SSDC employment land completions 2021/22.

Historical Completions

- 7.10 In terms of completion trends since 2018, the last two years have provided a relatively consistent quantum of employment land delivery at 8,484m² (2020/21) and 9,165m² (2021/22) respectively. There was a slightly lower delivery rate in 2019/20 at 3,861m², whilst 2018/19 showed a much larger volume of employment land delivery at 125,093m².
- 7.11 The reason for 2018/19 having such a large figure is due to a number of significant applications delivering simultaneously. This included plot G (ERA Security)⁷ and plot F (Atlas)⁸ on i54. Together supplying a total of 17,269m² of B2 floorspace. Alongside Bericote, Four Ashes⁹ providing a total of 106,867m² of B8 floorspace.
- 7.12 Since the adoption of the SAD in 2018, a total of 146,603m² (net) of employment land has been completed. As noted in paragraph 7.11, a significant proportion of this derives from the high volume during 2018/19. If this was to be disregarded, there would be a more modest total of 22,467m² across the 4 years.

⁷ 16/00187/REM

^{8 16/01057/}REM

⁹ 16/00498/FUL

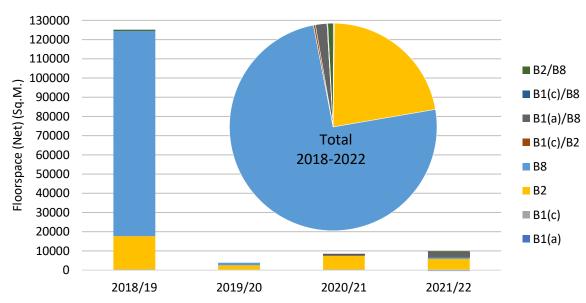


Figure 7: SSDC annualised employment delivery 2018 to 2022.

7.13 This illustrates the dominance of units for B2 and B8 (or combination) uses. 96.8% of all post 2018 completions are as such. However again, this is solely due to the delivery of large unit at i54 and Four Ashes in 2018/19. If these were to be discounted, then B2 and/or B8 use would count as 15%.

Employment Land Supply

7.14 As of April 2022, the authority can demonstrate that it has a total of 129,000m² gross (across nearly 40ha) employment land in the pipeline as defined by applications with extant permission and those being implemented. 23,868m² of floorspace is currently under construction with 87% of that being accounted for by 3 units providing a combined B2/B8 use approved at Hilton Cross Business Park, Featherstone¹⁰.

	Employment Land Permissions at 2021/22					
	Under Construction			Not Started		
	Gains	Losses	На	Gains	Losses	На
	Sq.M. (Gross)	Sq.M (Gross)	(Net)	Sq.m. (Gross)	Sq.M (Gross)	(Net)
B1(a)	2,699	-187	0.57	1,419	-172	0.33
B1(b)	0	0	0	0	0	0.00
B1(c)	0	0	0	0	-340	-0.01
B2	0	0	0	46,522	-3,616	9.83
B8	238	0	0.75	2,583	-1,323	0.64
B1(a)/B2	0	0	0	0	0	0.00
B1(b)/B2	0	0	0	0	0	0.00
B1(c)/B2	0	0	0	0	0	0.00
B1(a)/B8	237	0	0.75	0	0	0.00
B1(b)/B8	0	0	0	0	0	0.00

¹⁰ 20/01078/FUL

L		23,868	-187	6.99	105,133	-5,451	29.03
Ī	B1/B2/B8	0	0	0	53,999	0	18.24
	B2/B8	20,694	0	4.92	0	0	0.00
	B1(c)/B8	0	0	0	610	0	0.00

Table 7: Quantity of employment land as permissioned at 2021/22.

- 7.15 There is a small loss of office space that is imminently about to be experienced where Beauchamp House, Stourton, is being converted into holiday let accommodation¹¹. As reflected by national trends, B1(a) office space continues to show some losses. However, within South Staffordshire, this is offset by gains over and above the quantum of losses to show a net increase in office space. Approved permissions are providing a net balance of 3,759m² of office floorspace; most of which is being provided at Dunston Business Village, Dunston.
- 7.16 The vast majority of extant employment floorspace is accounted for at i54 (western extension, south). There exists a reserved matters approval for 46,451m² of B2 floorspace within a single unit¹² and the remaining 53,549m² as outline B1/B2/B8¹³ awaiting the submission of a detailed planning application. Incidentally, this is also the entire quantum of outline permission (18.2ha) at March 2022. A further 13.1ha benefits from full planning permission. The identified strategic sites continue to play a significant role in supplying employment uses with 96% of all 'under construction' and 'not started' sites being located therein.
- 7.17 It is worth noting that the sizeable loss of employment land particularly across B2 use is due to the loss of Prime Oak, Swindon¹⁴. This business has however previously been approved a replacement site on Heathmill Road Industrial Estate, Wombourne (see paragraph 7.7); which has incidentally completed during 2021/22.

¹¹ 19/00739/FUL

^{12 21/01248/}REM

^{13 &}lt;u>18/00637/OUT</u>

^{14 19/00989/}FUL





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