



**South Staffordshire Council**

# Authority Monitoring Report 2023



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## **South Staffordshire District Council**

### **Authority Monitoring Report**

#### **Executive Summary**

This Authority Monitoring Report 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 2022 to 31 March 2023 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.

It is the responsibility of the Local Planning Authority to monitor its own performance against the requirements adopted through the Core Strategy (2012) and monitor allocated sites in the Site Allocations Document (2018). As such, despite this AMR sitting within the context of the LDS including the existing Core Strategy and Site Allocations Document – 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 <https://www.sstaffs.gov.uk/local-plans>.

To keep up to date with the progress of the preparation of the Local Plan review, and other strategic planning consultations, please use our online consultation system at [sstaffs.oc2.uk](https://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) but substantively remained unchanged.
- 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. These are set out in Part 8 of the Town and Country Planning (Local Planning) (England) Regulations 2012 which establish the minimum requirements for the contents of the report. The full monitoring requirements are confirmed through the adoption of the 2012 South Staffordshire Core Strategy (“Core Strategy”) alongside monitoring 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 2022 to 31 March 2023, 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 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 2023) in order to provide context.

### **3.0 National Planning Context**

- 3.1 The National Planning Policy Framework (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. Periodically, the Government revises the NPPF, with the most recent version being published in December 2023.
- 3.2 Planning Practice Guidance (PPG) supports the NPPF with more detailed, accessible and technical guidance which is updated regularly.
- 3.3 The Town and Country Planning (Local Planning) (England) Regulations 2012 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 Local Planning Context**

- 4.1 The Local Development Scheme (LDS) is a timetable of proposed stages of production of planning policy documents and was reviewed and updated in September 2023 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 Statement of Community Involvement (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 2023, 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 since the previous AMR publication in 2022. However, one Neighbourhood Plan has been made subsequent to March 2023; Kinver Neighbourhood Plan was made in September 2023.

- 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 Infrastructure Funding Statement (IFS) illustrating the collection of Section 106 monies and CIL contributions. As the council has not adopted a CIL, infrastructure is solely funded via S106 agreements.
- 4.7 The most recent IFS for the district covering the financial year 2022/23 illustrates that £363,650.52 was collected in S106 contributions. A further £80,853 has been secured through planning obligations entered into in 2022/23, whilst during the year, the authority has spent £153,034.70 of contributions primarily upon Cannock Chase SAC and affordable housing contributions.

#### Local Planning Documents

- 4.8 There have been no consultations on any Local Planning Documents (including Supplementary Planning Documents) since the publication of the previous AMR.

#### 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 Since the publication of the previous AMR, the council paused progress upon the producing the new Local Plan in January 2023, and subsequently restarted this process to reflect national planning policy making. As such there has been a delay. Therefore the revised Local Development Scheme (LDS) indicates that the emerging Local Plan will be prepared, examined, and adopted by winter 2025/26.

Main Stages		Date
Evidence Gathering	<ul style="list-style-type: none"> <li>• Identification of main planning issues for the district.</li> <li>• Development of Strategy Options</li> <li>• Call for Sites</li> <li>• SHMA</li> <li>• Sustainability Appraisal (SA) Scoping Report</li> </ul>	2016-present
Issues and Options	<ul style="list-style-type: none"> <li>• Public consultation on whether the correct issues were identified and potential strategies and policies to meet different development needs</li> <li>• Additional Call for Sites</li> <li>• Initial Sustainability Appraisal (SA) Report</li> </ul>	October 2018

Spatial Housing Strategy & Infrastructure Delivery Consultation	<ul style="list-style-type: none"> <li>Public consultation on strategic approach to new housing development, including broad locations but not specific sites</li> <li>SA of spatial growth options</li> </ul>	October 2019
Preferred Options Plan	<ul style="list-style-type: none"> <li>Public consultation on the Council's preferred options for sites and policy direction of travel</li> <li>Draft SA Report</li> </ul>	November 2021
Publication Plan (1)	<ul style="list-style-type: none"> <li>Sets out the final Local Plan for submission to the Secretary of State (SoS)/Government</li> <li>Public consultation on legal compliance and 'soundness'</li> <li>Final draft SA Report</li> </ul>	November 2022
Publication Plan (2)		Spring 2024
Submission and Examination	<ul style="list-style-type: none"> <li>Local Plan submitted to Government (Planning Inspectorate) with all the comments received during the Publication Plan consultation</li> <li>Independent Examination carried out in public by a Planning Inspector</li> <li>Final SA Report</li> </ul>	2025
Adoption	<ul style="list-style-type: none"> <li>Council formally adopts Local Plan</li> <li>SA Adoption Statement</li> </ul>	Estimated Winter 2025/26
Monitoring and Review	<ul style="list-style-type: none"> <li>Each year, identified targets and planning applications are monitored to assess delivery of the Local Plan</li> </ul>	Ongoing

Table 1: Stages of Plan-making.

- 4.11 The Regulation 19 Publication Plan consultation was undertaken between 11 November 2022 until 23 December 2022. 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 presented detailed development management policies.
- 4.12 All comments submitted were reviewed in order to inform the next step of the plan preparation process: preparing the plan to reflect the additional evidence received to form the basis of submission to the Secretary of State for independent examination in due course. However, as set out in paragraph 4.10, due to the government's proposed changes to the NPPF, the plan preparation process suffered a delay, and it is now expected that an updated Regulation 19 Publication Plan will be consulted upon prior to submission.



- 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<sup>1</sup>. The following list provides the most up to date position of the evidence base, showing documents published between April 2022 and March 2023. There are documents produced prior to this.
- Infrastructure Delivery Plan (2022).
  - GBBCHMA Position Statement (2023).
  - Viability Assessment, Stage 2 Report (2022) – by Dixon Searle Partnership.
  - Economic Development Needs Assessment (2022) – by DLP Planning.
  - Landscape Sensitivity Assessment (2022) – by Land Use Consultants (LUC).
  - Habitats Regulations Assessment (2022) – by Footprint Ecology.
  - Level 2 Strategic Flood Risk Assessment (2022) – by JBA Consulting.
  - Sustainability Appraisal (2022) – by Lepus Consulting.
  - Gypsy and Traveller Accommodation Site Assessment (2022).
  - Historic Environment Site Assessment (2022) – by AOC Archaeology Group.
  - South Staffordshire Housing Market Assessment (2022) by HDH Planning and Development.
  - Land east of Bilbrook, Strategic Transport Statement (2022) – by Capricorn Transport Planning.
  - Land at Cross Green, Strategic Transport Assessment (2022) – by David Tucker Associates Transport Planning Consultants.
  - Land north of Linthouse Lane, Strategic Transport Assessment (2022) – by David Tucker Associates Transport Planning Consultants.
  - Land north of Penkridge, Strategic Transport Assessment (2022) – by Phil Jones Associates.

#### 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

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<sup>1</sup><https://www.sstaffs.gov.uk/local-plan-review-evidence-base>

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. An updated Duty to Cooperate Topic Paper was issued by the Council in November 2022 which reaffirms these commitments 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 Between 1 April 2022 and 31 March 2023, the Council signed a Statement of Common Ground (SoCG) in relation to the Greater Birmingham and Black Country Housing Market Area alongside Birmingham City Council, Cannock Chase District Council, Sandwell Metropolitan Borough Council, Solihull Metropolitan Borough Council, Stratford-on-Avon District Council, Tamworth Borough Council, City of Wolverhampton Council, and Wyre Forest District Council. The Council has also signed a bilateral SoCG with the same authorities as above, and in addition; Dudley Metropolitan Borough Council, Lichfield District Council, and Telford and Wrekin Council. SSDC 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.
- 4.19 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. Although in this regard, SSDC has not prepared any documents this monitoring year (further to those listed in paragraph 4.15) alongside other stakeholders which form part of the evidence base to the Local Plan.

## **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 emerging new Local 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 Showpersons 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 237 dwellings per annum<sup>1</sup>. This remains consistent with last years' calculation of 241 dwellings.
- 6.2 During 2022/23, there were 622 net completions alone. Overall, between April 2018 and March 2023, there has been a total of 1,900 net dwellings completed. When compared to the annualised standard methodology requirements year-on-year (which superseded the Core Strategy target of 175 per annum in 2017) this indicates an oversupply of 35% since 2018. Across the plan period (2012 – 2022), the authority has regularly exceeded its housing requirement (overall by 27%), and it's therefore considered that the delivery mechanisms in both the Core Strategy and SAD have been delivering.

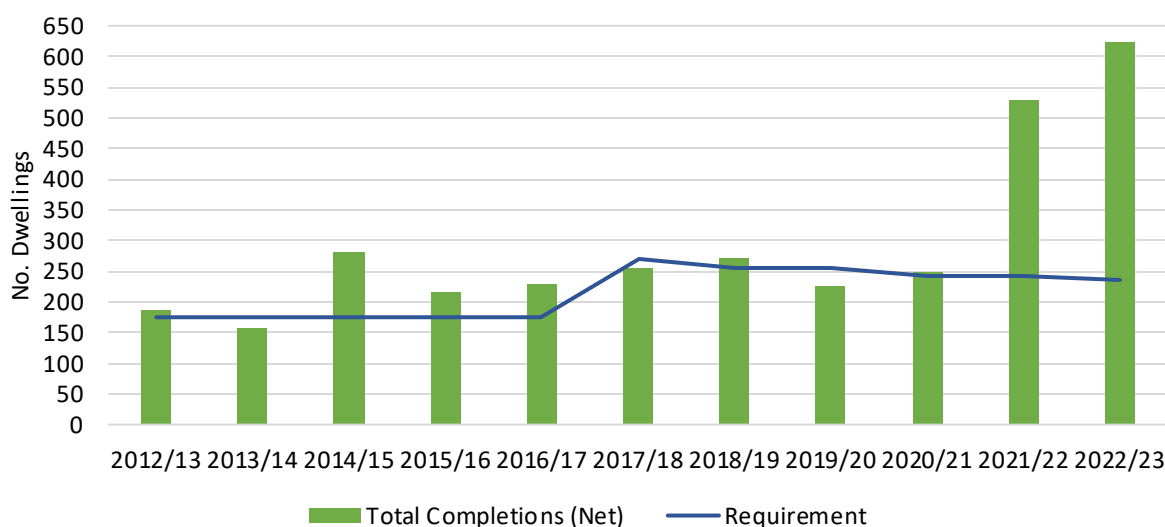


Figure 1: SSDC annualised housing completions 2012 to 2023.

- 6.3 The council's latest Housing Supply Statement covers 1st April 2023 - 31st March 2028 and shows that the district currently has a 4.51 year housing land supply. The calculation of this is set out in more detail in the Housing Land Supply Statement 2022 – 2023<sup>1</sup>. The relatively significant delivery of dwellings at pace in recent years has impacted the number of dwellings contributing towards the district's supply.

<sup>1</sup> <https://www.sstaffs.gov.uk/planning/planning-policy/land-registers-housing-land-supply>

## Housing Trajectory and Projections

- 6.4 There were 425 dwellings under construction at 31 March 2023, and the remaining housing supply with extant permission is split between those sites that have not started, and the remaining/outstanding capacity on sites which are already under construction. In total, there were 645 dwellings yet to be started and these plus 425 under construction means 1070 in supply. This is significantly fewer than last year; a reduction of 359 dwellings. Where possible, these are net figures and as such replacement dwellings and other losses have been discounted. 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 dwellings.
- 6.5 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 the Five Year Housing Land Supply Statement 2022 – 2023.

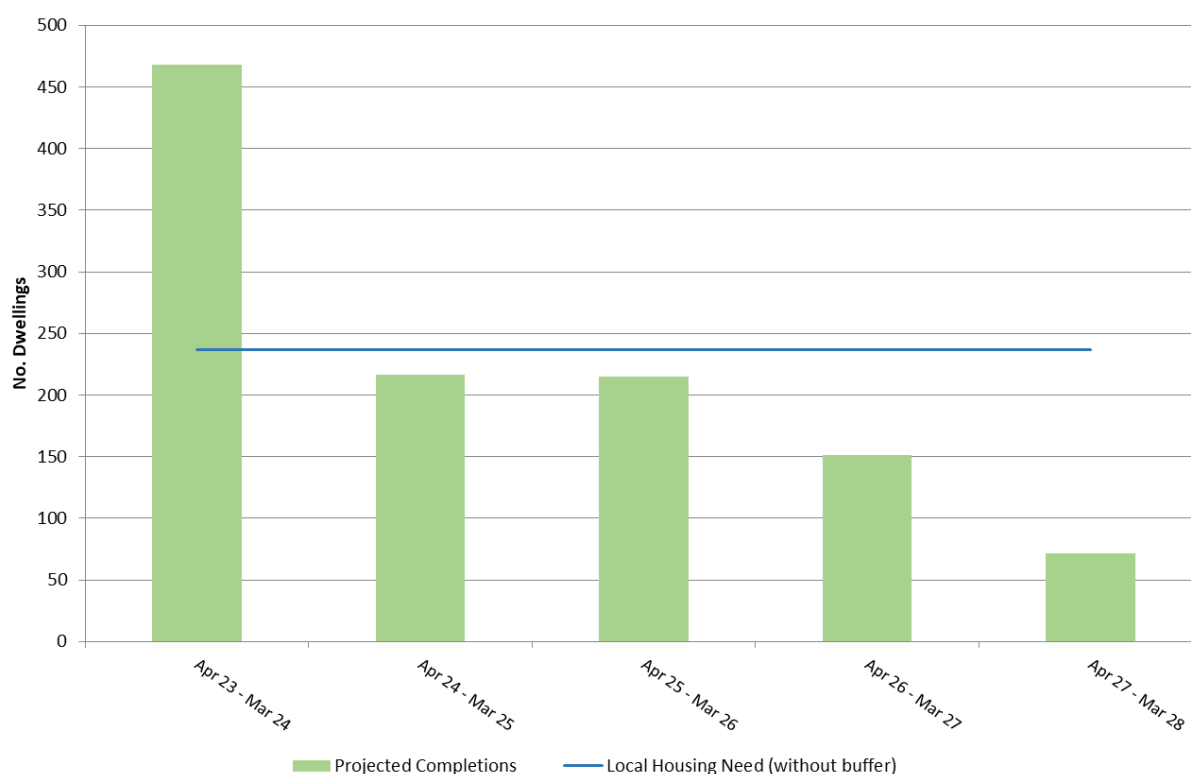


Figure 2: SSDC projected annualised housing completions 2023 to 2028<sup>2</sup>.

- 6.6 Of the 19 sites allocated in the SAD, 8 have been completed and 6 are currently progressing development. A further site at White Hill, Kinver benefits from outline permission. To date, these have provided 895 completed dwellings in the district, with a further 402 permitted or under construction. All but one have over delivered. On average, this is by an increase of 36% against allocated capacity.

<sup>2</sup> Local Plan Review allocations are not included.

- 6.7 During the course of the monitoring year, 4 of the SAD allocations that were previously progressing, completed. This included; Keepers Lane, Codsall, Engleton Lane, Brewood, Hyde Lane, Kinver, and Ounsdale Road, Wombourne.
- 6.8 There is a total outstanding capacity of a minimum 105 units on 'un-permissioned' allocated SAD sites at; Histons Hill, Codsall, 154a Walsall Road, Great Wyrley, Pool View, Great Wyrley, Himley Lane, Swindon, and Ivetsey Road, Wheaton Aston. 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 49 units having completed approximately 70%.

Ref.	Site Name/Location	Allocated Capacity	Comp.	U.C.	N.S.
443	Land off Pendeford Mill Lane, Bilbrook	102	116	48	0
228	<i>Former Adult Training Centre, Histons Hill, Codsall*</i>	20	0	0	0
223	Land at Watery Lane, Codsall	160	180	0	0
406	Land at Keepers Lane, Codsall	50	65	0	0
054	Land at Engleton Lane, Brewood	53	73	0	0
119	Land off Saredon Road, Cheslyn Hay	63	24	26	10
141	<i>Land at 154a Walsall Road, Great Wyrley*</i>	25	0	0	0
139	<i>Land at Pool View, Great Wyrley*</i>	35	0	0	0
136	Land at Landywood Lane, Great Wyrley	35	0	44	6
086	Land west of School Lane, Coven	40	63	0	0
168	Land at Brinsford Lodge, Featherstone	60	77	4	0
270	Land off Hyde Lane, Kinver	30	45	0	0
274	Land south of White Hill, Kinver	30	0	0	40
239	Land west of Wrottesley Park Road (south), Perton	163	0	123	97
313	<i>Land off Himley Lane (south), Swindon*</i>	10	0	0	0
379	<i>Land east of Ivetsey Road, Wheaton Aston*</i>	15	0	0	0
281a	Land off Ounsdale Road (south), Wombourne	19	32	0	0
302	Land north of Beggars Bush Lane, Wombourne	80	86	4	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

- 6.9 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. Likewise, the Core Strategy establishes the tenure split of affordable products. However, with the introduction of First Homes<sup>3</sup> forming a compulsory part of affordable housing contributions as discounted market tenure, the council's revised affordable provision

<sup>3</sup> <https://www.gov.uk/guidance/first-homes>

is: 50% social rent, 25% intermediate ownership, 25% first homes. To date, there has been no delivery specifically of first homes.

- 6.10 A total of 156 affordable housing units were completed in 2022/23. 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, Hyde Lane, Kinver, Beggars Bush Lane, Wombourne, Pendeford Mill Lane, Bilbrook, Stafford Road, Penkridge, Saredon Road, Cheslyn Hay, and Brinsford Lodge, Featherstone.

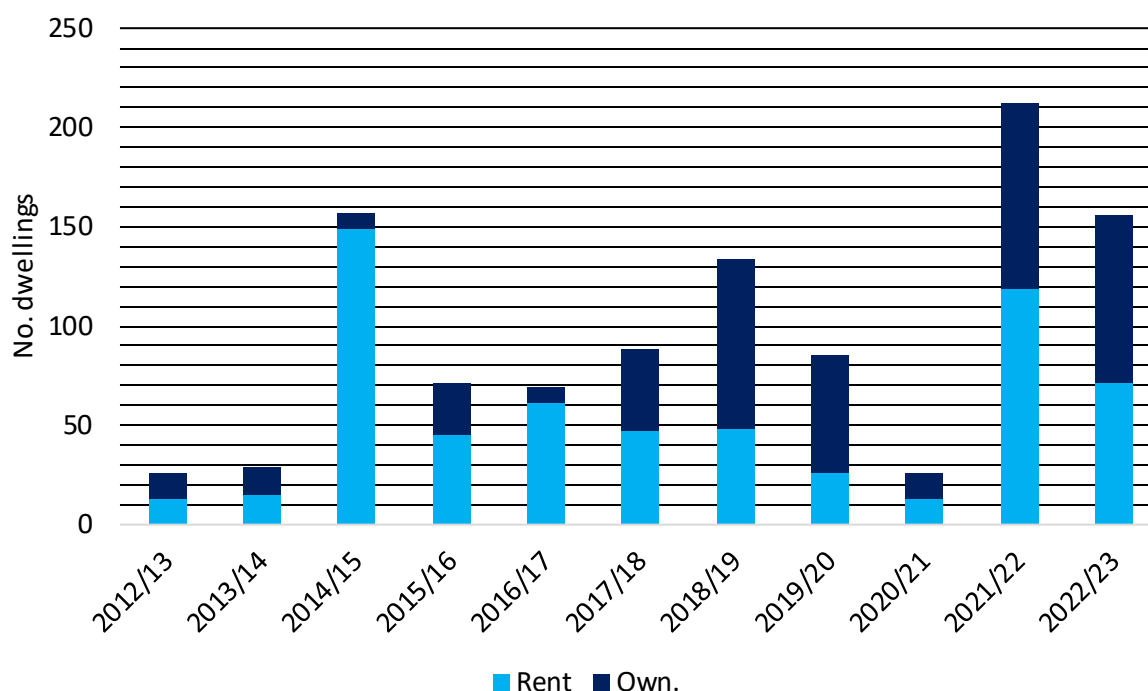


Figure 3: SSDC annualised affordable housing completions 2012 to 2023.

- 6.11 Affordable completions between 2012 and 2023 amount to 1,053 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 353 affordable units with either extant planning permission or under construction at 31 March 2023, and projected to be delivered before 2028. These are largely on the same large sites as above, as only 32 affordable dwellings were granted permission in 2022/23. In terms of the two Rural Exception Sites approved in 2020/21, Shop Lane, Oaken has now commenced, whilst Common Lane, Bednall remains still extant.
- 6.12 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.

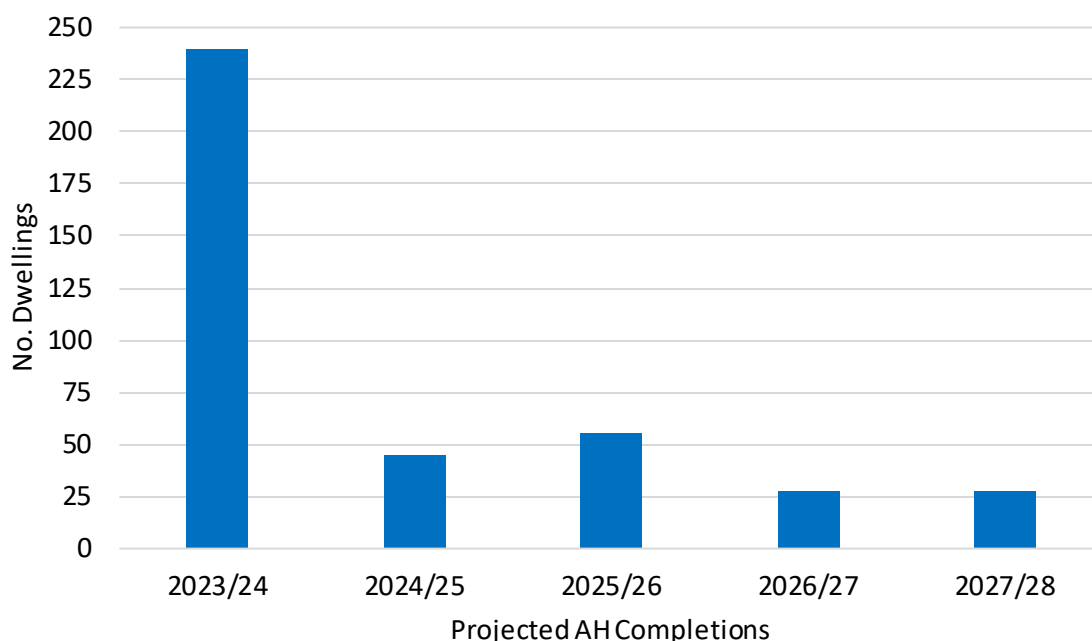


Figure 4: SSDC projected annualised affordable housing completions 2023 to 2028.

#### Extra Care

- 6.13 There is currently 1 planning applications delivering C2 Extra Care accommodation at Wolverhampton Road, Codsall (x15 C3 dwellings equivalent not started). There have been no completions in the current monitoring year.

#### Self and Custom Build

- 6.14 The Self-build and Custom Housebuilding Act 2015 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-Build Register in order to facilitate the delivery of Self and Custom Build (SCB) properties. This is reflective of the current national planning policy position.
- 6.15 At 31 March 2023, there were a total of 32 individual entries on the SCB Register, and 0 group entries. This equates to an additional 2 individual entries onto the register since 2022. Over the same period, 5 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 Self-build and Custom Housebuilding Act 2015 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.

#### Gypsy and Traveller Pitches

- 6.16 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	22/23
Requirement	32	4	4	4	4	4	3	3	3	3	3	3
Cumulative Requirement	32	36	40	44	48	52	55	58	61	64	67	70
Permanent Permissions	41	5	0	2	15	2	0	2	3	4	0	3
Cumulative Permissions	41	46	46	48	63	65	65	67	70	74	74	77
Residual Requirement +/-	+9	+10	+6	+4	+15	+13	+10	+9	+9	+10	+7	+7

Table 3: SSDC annualised Gypsy pitch requirements and permissions 2007 to 2023.

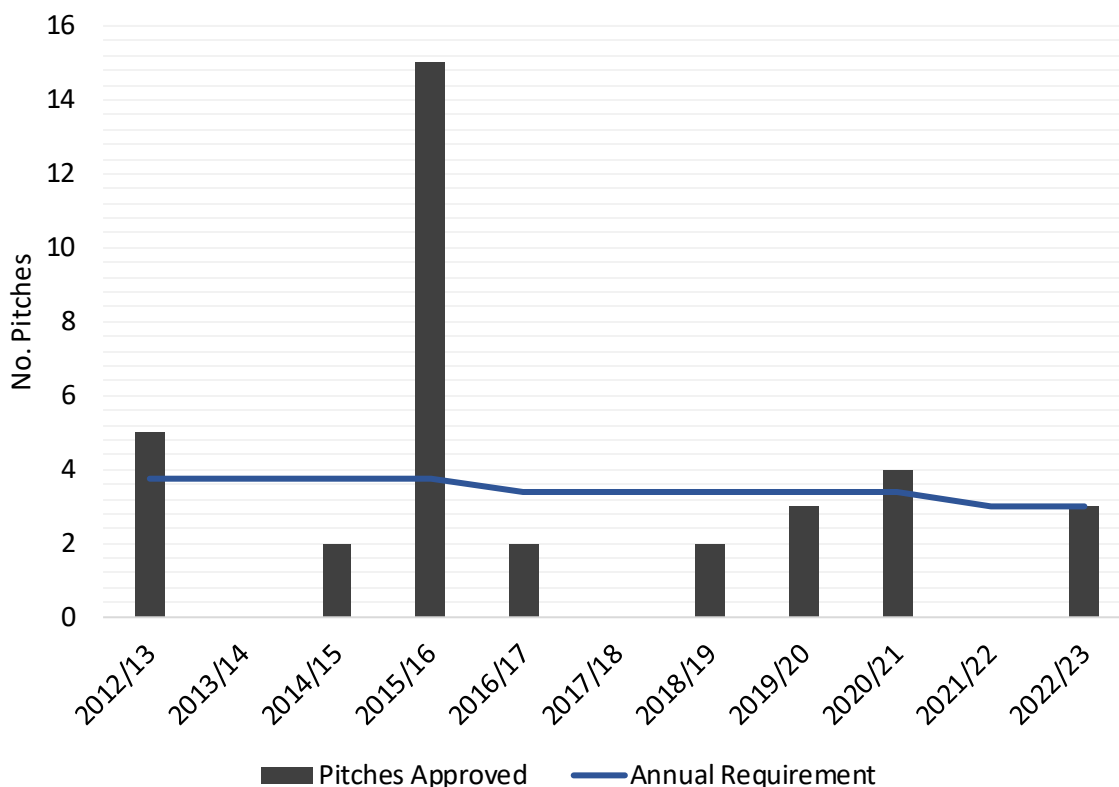


Figure 5: SSDC annualised Gypsy pitch delivery 2012 to 2023.

- 6.17 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 36 pitches since 2012 versus a 38 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.
- 6.18 With regards to Policy SAD4, despite the policy allocating 20 additional pitches, 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, WS11 1RS	1 temporary pitch to permanent.	Regularisation not come forward.
GT03	New Stables, Poplar Lane, Hatherton, WS11 1NQ	2 additional pitches.	Not come forward.
GT05	Granary Cottage, Dark Lane, Slade Heath,	2 additional pitches.	Not come forward.
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.	4 pitches 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 2022/23, 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 63.6ha of employment land to meet the needs of the district.
- 7.3 The table below shows the amount of land available for employment use at 31 March 2023 upon identified/allocated sites where they either do not benefit from planning permission, or where an approved permission is either extant or under construction. It does not include windfall development or other employment floorspace opportunities outside of sites recognised as being suitable for such. 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 2020<sup>1</sup> 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)
<i>Strategic Employment Sites</i>	
Four Ashes, Brewood & Coven	0.6
Hilton Cross, Featherstone	0.0
ROF Featherstone, Featherstone	*36.0
West Midlands Interchange (WMI), Penkridge	297.0
i54, Bilbrook	**4.8
i54 (Western Extension), Bilbrook	**40.0
<i>Non-Strategic Employment Sites</i>	
Acton Gate, Dunston	0.0
Acton Plaza, Dunston	0.0

<sup>1</sup> <https://www.legislation.gov.uk/uksi/2020/757/made>

Balliol Business Park, Bilbrook	0.0
Coppice Lane, Cheslyn Hay	0.0
Dunston Business Village, Dunston	0.1
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
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	**0.8
Vernon Park, Hilton	**2.8
<b>Total</b>	<b>382.2</b>
<b>Less WMI</b>	<b>85.1</b>

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

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

\*\*\*This land has benefitted from a certificate of lawful use for B2 use for over 10 years, however it is located in the Green Belt and therefore as a precautionary measure it is not included in the supply total.

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

7.4 Of all the identified employment sites, there is a total of 382.2ha of employment land available that is either being delivered on or directly adjacent to identified employment sites, or is vacant on-site. It reflects the most up-to-date site knowledge that has fed into the production of the Economic Development Needs Assessment (EDNA), and emerging Local Plan evidence base. The total reduces to 85.1ha 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 2020<sup>2</sup>, it is not an employment allocation in the CS or SAD. Nevertheless, a couple of reserved matters applications have now been approved (see paragraph 7.13).

7.5 For the avoidance of doubt, these figures differ slightly from those used in the EDNA. This is because the EDNA uses the available floorspace pipeline to derive a more realistic and accurate hectareage value based upon use consented classes.

<sup>2</sup> <https://infrastructure.planninginspectorate.gov.uk/projects/west-midlands/west-midlands-interchange/>

- 7.6 Equally, Table 5 only sets out supply at the district's main employment areas and therefore these figures do not pick-up small scale windfall supply that has been consented outside these employment areas, often in more rural locations.
- 7.7 All the sites listed in Table 5 (with the exception of WMI) are included within paragraph 9.4 of the SAD as an identified employment land supply; although the latter additionally includes Ounsdale Road Industrial Estate, Wombourne. However, in February and July 2019 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.

#### Employment Land Completions

- 7.8 During 2022/23 a total of 6.8ha (net) delivering 22,775m<sup>2</sup> (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

- 7.9 The predominant employment use to be delivered is within the industrial sector with 90% of total floorspace completions across the year being within B2 use. This is solely due to the completion of multiple warehouses on a number of plots at Hilton Cross<sup>3</sup>. For the same reason, 91% of all gross floorspace delivered was within an identified employment location within the Core Strategy: 20,694m at Hilton Cross.

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<sup>3</sup> 20/01078/FUL

		2022/23 Employment Land Completions		
		Gains Sq.m. (Gross)	Losses Sq.M (Gross)	Ha (net)
Offices/Research	B1(a)	1,004	-172	0.32
	B1(b)	0	0	0
Industrial	B1(c)	0	0	0
	B2	0	0	0
	B1(c)/B2	398	0	0.02
Storage/Distribution	B8	0	0	0
Offices/Research + Industrial	B1(a)/B2	0	0	0
	B1(b)/B2	0	0	0
Offices/Research + Storage/Distribution	B1(a)/B8	237	0	1.50
	B1(b)/B8	0	0	0
Industrial + Storage/Distribution	B1(c)/B8	442	0	0.04
	B2/B8	20,694	0	4.92
All	B1/B2/B8	0	0	0
<b>Total</b>		<b>22,775</b>	<b>-172</b>	<b>6.79</b>

Table 6: SSDC employment land completions 2022/23.

- 7.10 In addition, a sizeable quantum of floorspace for a combination of B1(a) was completed. This was 1,004m<sup>2</sup> completed at Dunston Business Village (an allocated employment site).

#### Historical Completions

- 7.11 Since the adoption of the SAD in 2018, a total of 169,378m<sup>2</sup> (net) of employment land has been completed. 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 44,285m<sup>2</sup> across the previous 4 years.

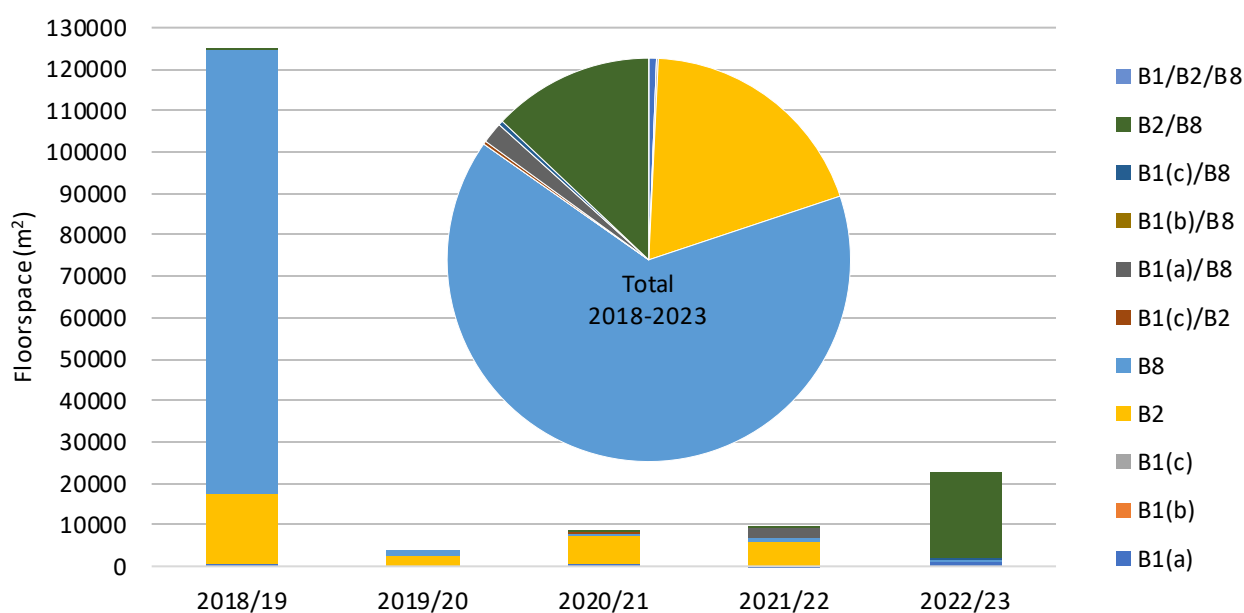


Figure 6: SSDC annualised employment delivery 2018 to 2023.

- 7.12 This illustrates the dominance of units for B2 and B8 (or combination) uses. 96.9% of all post 2018 completions are as such. However again, this is solely due to the delivery of large units 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 Permissioned

- 7.13 As of April 2023, the authority can demonstrate that it has a total of 1,049,566m<sup>2</sup> gross (across nearly 383ha) employment land in the pipeline as defined by applications with extant permission and those being implemented. This large figure is due to the newly approved reserved matters applications at WMI<sup>4</sup>.

Employment Land Permissions at 2022/23				
	Under Construction (m <sup>2</sup> )		Not Started (m <sup>2</sup> )	
	Gains	Losses	Gains	Losses
B1(a)	0	-187	8,602	-738
B1(b)	0	0	0	0
B1(c)	0	0	0	-340
B2	71	0	85,484	-5,246
B8	0	-1,009	676,136	-314
B1(a)/B2	0	0	0	0
B1(b)/B2	0	0	23,109	0
B1(c)/B2	0	0	0	0
B1(a)/B8	0	0	0	0
B1(b)/B8	0	0	0	0
B1(c)/B8	0	0	168	0
B2/B8	0	0	97,496	-5,760
B1/B2/B8	0	0	158,571	0
<b>Total</b>	<b>71</b>	<b>-1,196</b>	<b>1,049,566</b>	<b>-12,398</b>

Table 7: Quantity of employment land as permissioned at 2022/23.

- 7.14 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 accommodation<sup>5</sup>, and Albany House, Penkridge is converted into residential accommodation<sup>6</sup>. As reflected by national trends, E (formerly 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 7,677m<sup>2</sup> of office floorspace across multiple applications but most significantly at i54 Western Extension as ancillary space<sup>7</sup>.

<sup>4</sup> [22/00719/REM](#) and [22/01143/REM](#)

<sup>5</sup> [19/00739/FUL](#)

<sup>6</sup> [21/00436/OUT](#)

<sup>7</sup> [22/00312/REM](#)

- 7.15 The vast majority of extant employment floorspace is accounted for at i54 (western extension, south), ROF Featherstone, and WMI. The identified strategic sites continue to play a significant role in supplying employment uses with 97% of all 'under construction' and 'not started' floorspace gains being located therein.
- 7.16 It is worth noting that the sizeable loss of employment land – particularly across B2 and B8 uses – is due to the loss of commercial units at Hilton Cross to car showroom and associated facilities<sup>8</sup>, and Leabank, Levedale Road, Penkridge (lost to residential use)<sup>9</sup>. The loss of Prime Oak, Swindon<sup>10</sup> is also worth highlighting as a relatively significant loss of employment floorspace.

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<sup>8</sup> [22/00827/FUL](#)

<sup>9</sup> [18/00074/OUT](#)

<sup>10</sup> [19/00989/FUL](#)



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November 2022