



## Local Plan Review Publication Plan 2024 Frequently Asked Questions

The Publication Plan (also known as a pre-submission plan) is published for consultation under Regulation 19 which is about the legal soundness of the plan.

This is the time in the plan process that residents, statutory bodies and other organisations, have the chance to put their views forward to the independent planning inspector who will be appointed by the government to examine the plan. People will also have the opportunity to ask to be heard at the public examination sessions.

There will be full examination of the evidence, and how the council has developed the plan in the context of national planning policy, and whether the proposed sites and policies can be justified.

The examination is a democratic process, taking account of the views of all participants which will be heard by an independent planning professional. After the examination process and subject to the plan being found sound, the final decision with whether to adopt the plan rests with the council.

This is the second Publication Plan consultation; the first was held in late 2022. Following changes to the National Planning Policy Framework (NPPF) made by the government in late 2023 and more up to date evidence, we have prepared a revised strategy which will cover the period 2023 to 2041.

### What is a Local Plan?

Every local planning authority must produce a Local Plan which sets out the planning framework for their area. It contains the amount of housing and employment growth being planned for in the next few years and where that growth will be located. It also contains policies which will be used to decide planning applications. The Local Plan is just that, local to the area it covers, so the policies in our Local Plan will be tailored to South Staffordshire.

### Why are we reviewing our current Local Plan?

All councils must review their Local Plans at least every 5 years to take on board updated information. The government has made it very clear that plans should be put in place without delay and having a new, up to date adopted plan will put us in a very strong position to resist developer led, unplanned development in locations outside of our control, or planning by appeal and we believe this is in the best interests of our residents.



## What stage is the Review at?

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We carried out an Issues and Options consultation in 2018, a Spatial Housing Strategy consultation in 2019, a Preferred Options in 2021 and a Publication Plan consultation in 2022. As a result of changes to national planning policy and updated evidence, we are carrying out a further **Publication, or pre-submission**, consultation. This is the version of the plan we want to be adopted, based on the planning evidence we have collected.

## What is a Regulation 19 Consultation, why is it different to previous consultations?

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The process for preparing and adopting a local plan is set out in law under planning regulations. Regulation 19 is different because it is about the legal soundness of the plan. Has the council prepared the plan positively? Is it justified and effective? Does it comply with national planning policy? Any comments you make should relate to these issues and they will be sent to the independent Planning Inspector who will be appointed to conduct a formal Examination into the plan, which will include public hearing sessions. We have prepared a guidance note to explain more. We will also send the representations we received to the 2022 Regulation 19 consultation to the Inspector.

## What is the council's approach?

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We have used non-Green Belt land already earmarked for development in our current plan, with new growth focussed in villages with the most facilities and services and where there are infrastructure opportunities. We have worked hard to bring forward brownfield options first, but there is very little available brownfield land in South Staffordshire. We have contained Green Belt release to our Tier 1 villages which are the most sustainable and have access to the rail network, and this will help us to meet our own housing need in the district. We know there are very difficult decisions to be made in providing new homes and protecting the Green Belt as much as we can, which is why less than **0.2%** is being proposed to be released through the plan.

## What about the Duty to Cooperate?

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All councils must meet a legal test known as Duty to Cooperate. This means we have to engage 'constructively, actively and on an ongoing basis' with our neighbouring authorities over matters which cut across administrative boundaries. In this Publication Plan we are proposing a small level of development towards the unmet housing need of the wider housing market area. We are also providing a contribution to the unmet economic needs of our wider Functional Economic Market Area (FEMA).

## Housing Numbers

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The overall level of development of just over 4,700 homes between 2023 and 2041 is made up of our own district's local housing need, which is set by the government, and a contribution towards the wider housing market area shortfalls. The Inspector will decide if our approach is sound, but we believe the evidence supports our approach.



## Is 'no development' an option?

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The simple answer is no. The government is clear that housing growth is fundamental to revitalising the economy and the thrust of national planning guidance (NPPF) is to significantly boost the supply of homes. The need for housing is not just a national issue, but a local one too. If we don't plan to deliver this growth ourselves, we will lose significant control over where it might go. Having a local plan in place which sets out firm locations and guidelines for development puts us in a much stronger position to defend the district from ad hoc applications.

## What evidence has been used to guide development?

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Preparing a Local Plan is not a simple process. The Plan is supported by a robust **Evidence Base** [www.sstaffs.gov.uk/planning/planning-policy/local-plan-review-evidence-base](http://www.sstaffs.gov.uk/planning/planning-policy/local-plan-review-evidence-base) which has looked at sustainability, the importance of the historic and natural environment, protecting and enhancing our landscapes, access to jobs and services and many other issues, including impact on the Green Belt. Our evidence has been published at each stage of the process so that you can see how the Plan has been developed.

## Green Belt and Landscape Studies

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We have asked specialist consultants to look at what impact development might have on our Green Belt and the landscape of the district. The studies have helped us to see where the most sensitive areas of landscape in the district are and which areas of Green Belt would be most affected by development.

## Why isn't Green Belt land protected from new development?

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The council is committed to the protection of the Green Belt, and we know there are very difficult decisions to be made when we are looking for new sites. Where we have proposed limited Green Belt release, it is in our most sustainable Tier 1 settlements and is supported by infrastructure and community benefits where opportunities exist. We will have to show the Inspector, who decides if the Plan is sound, the reasons why we have chosen to release some Green Belt land.

## How much Green Belt will be released?

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Sites for housing and employment development proposed to be released from the Green Belt amount to less than 0.2% of the Green Belt in the district.

## Are Green Belt and Greenfield the same?

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No, greenfield sites are those which have not previously been built on, or where previous development has blended back into the landscape. Brownfield land is previously developed land, although this excludes agricultural buildings. Green Belt is a planning, not environmental, designation and the Green Belt can include land that is both greenfield and brownfield.

## Climate Change

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The Local Plan contains policies to achieve (regulated) Net Zero on new housing sites and large sites will have whole life carbon assessments. There is a suite of renewable energy policies, including electric charging points on new homes, and there will be a 10% biodiversity net gain on major sites through good design principles.



## Consultation

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The Publication Plan consultation is carried out under formal planning regulations. There is a 6 week public consultation period for comments to be made. Comments must be made in writing between 18 April and 12 noon on 31 May 2024. **Comments made before or after these dates cannot be considered.**

## Community Engagement

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There will be opportunities to discuss the plan with the Local Plans Team throughout the consultation period. We will be holding online Question and Answer Sessions where officers will explain the proposals and you will be able to submit questions for the team to answer. We will also be holding face to face sessions at the Council Offices and in the 5 localities, by appointment, plus online appointments via Teams and telephone.

## Consultation System

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Our consultation system allows you to read the plan and make your comments direct. You can manage your own account and response and see details of other responses when they are published. It's very simple, all you need is your email address to register. Go to <https://sstaffs.oc2.uk/login>

If you made comments on previous consultations and we have your email address, you will already be on the system.

## Stay Informed

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We will keep our website and Facebook page updated with details of the consultation. We will write to everyone who has made comments previously, or who has registered on our database, to let them know about the consultation, where to find the documents and how to submit a response.

## Next Steps

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The Secretary of State will appoint an independent Planning Inspector to conduct an **Examination in Public** [www.gov.uk/guidance/plan-making#plan-examinations](http://www.gov.uk/guidance/plan-making#plan-examinations). The Inspector's role is to consider whether the Plan is **sound and legally compliant** (including the **Duty to Cooperate** [www.gov.uk/guidance/plan-making#duty-to-cooperate](http://www.gov.uk/guidance/plan-making#duty-to-cooperate)). In doing this they will consider any representations received on the final draft and hold public hearing sessions where the main matters and issues raised in the representations can be discussed in person.

All the information on the Local Plan review to date and the supporting documents are available online at [www.sstaffs.gov.uk/planning/planning-policy/local-plan-review](http://www.sstaffs.gov.uk/planning/planning-policy/local-plan-review)



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