

A New Development Strategy for South Staffordshire 2023-2041

The Local Plan Review

Spatial Housing Strategy Topic Paper

April 2024

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1. Introduction

- 1.1 South Staffordshire Council is currently at Regulation 19 consultation stage in preparing its new Local Plan which details the Council's spatial strategy for housing growth over the plan period 2023-2041. The need to undertake an early review of its Local Plan is to ensure the Council can meet the increased housing and employment needs of the district and to see whether it can meet some of the unmet needs from other areas. The preferred spatial strategy has been arrived at through an iterative process of developing the local plan following a number of stages of consultation as set out below:
- Issues and Option consultation - October 2018 (Regulation 18)
 - Spatial Strategy and Infrastructure Delivery consultation - October 2019 (Regulation 18)
 - Preferred Options consultation - November 2021 (Regulation 18)
 - Publication Plan consultation - November 2022 (Regulation 19)
 - Publication Plan consultation - April 2024 (Regulation 19)
- 1.2 Through plan development having considered the evidence and consultation responses a preferred spatial strategy has been identified. This is set out as Option I in this paper and will see **a capacity-led approach focusing growth to sustainable non-Green Belt sites and limited Green Belt development in Tier 1 settlements well served by public transport**. The main focus of the growth under this preferred strategy is on non-Green Belt land at suitable existing safeguarded land sites, sustainable open countryside sites, and limited brownfield sites available within settlement boundaries of sustainable settlements. The strategy does involve a limited number of Green Belt allocations, but limited to the district's Tier 1 settlements, including allocations that will deliver some key infrastructure priorities (e.g first school at Bilbrook). This strategy meets the Council's current housing requirement (as per the Government's Standard Method formula) and provides for enough homes to make around a 640 home contribution of unmet housing needs originating from the wider Greater Birmingham and Black Country Housing Market Area (GBBCHMA).
- 1.3 In order to arrive at the preferred strategy a number of reasonable alternative options for distributing growth have been assessed through this paper and the Sustainability Appraisal before concluding on the preferred approach.

2. Developing spatial options

2.1 The Council initially began considering spatial options as part of developing the 2018 Issues and Options consultation, recognising that understanding views on longer term pattern of development at an early stage of plan development was critical. Six scoping options that set out where development could broadly take place were developed and consulted on as part of the Issues and Options consultation, are set out below:

• Scoping Option A:	Rural housing growth focused on the district’s larger and better-connected villages
• Scoping Option B:	Rural housing growth dispersed across all settlements with a basic level of service provision within the district
• Scoping Option C:	Small-scale urban extensions on the fringe of neighbouring urban areas
• Scoping Option D:	Larger urban extensions on the fringe of neighbouring urban areas
• Scoping Option E:	New freestanding settlements away from the existing villages/urban areas
• Scoping Option F:	Introduce minimum housing densities on all housing sites and intensify development within the existing village development boundaries

2.2 It was clear from the consultation responses received to the Issues and Options consultation that it was unlikely that the Council would be able to meet its housing requirements by using only one of these spatial options in isolation. In reality, it was likely that the spatial distribution for development would likely involve elements of some or all the above approaches.

2.3 Each of the Spatial Housing Options involves a combination of the Scoping Options consulted on in the Issues and Options consultation in 2018, and reflect the following strategic approaches:

- Maximise Open Countryside release
- Prioritising Green Belt land release in areas of lesser Green Belt harm
- Carry forward existing Core Strategy strategic approach to distribution
- Maximising sites in areas identified in the GBBCHMA Strategic Growth Study
- Addressing local affordability issues and settlements with the greatest needs
- Giving first consideration to Green Belt land which is previously developed or well-served by public transport
- Infrastructure-led development with a garden village area of search beyond the plan period

2.4 Options A-G set out in this paper were first tested through the 2019 Spatial Housing and Infrastructure Delivery (SHSID) consultation and informed the Council’s preferred spatial strategy approach that was consulted on through the November 2022 Publication Plan (Regulation 19) consultation. Following the 2022 Publication Plan consultation the Council paused preparation of the Local Plan following proposed changes to national policy, with

those relating to Green Belt particularly relevant. The Council were previously of the view that the level of growth proposed (incorporating the 4,000 home contribution to HMA unmet need) would be necessary in order to have a sound plan, however proposed changes to the NPPF cast doubt over that assertion. Following publication of the updated NPPF in December 2023 and confirmation that there was no requirement for Green Belt boundaries to be reviewed or changed, and it was within authorities' gift to choose to do so where they could demonstrate exceptional circumstances, led the Council to review its strategic approach.

- 2.5 In addition, the Council was also mindful that the delay to plan preparation meant that the Strategic Growth Study (2018) on which the previous 4,000 home contribution was directly informed, was no longer up to date and therefore could not be relied to justify at the strategic level the previously proposed plan target and level of Green Belt release. Furthermore, the delay to plan preparation meant that it would not be possible to submit the previous 2022 version of the plan as that plans end date (2039) would be inconsistent with national policy requiring Local Plans to cover 15 years post adoption. It was therefore the Council's view that submitting the previous 2022 Publication Plan would be contrary to Section 20(2)(b) of the Planning and Compulsory Purchase Act 2004.
- 2.6 Given the change in circumstances, in September 2023 the Council committed to a further Regulation 19 consultation and developed two additional Spatial Options (Option H and I), both of which did not include the previously proposed 4,000 home contribution to unmet needs of the HMA. These reflect the following strategic approach:
- Meet the District's own housing needs only, through sustainable non-Green Belt development and limited Green Belt development only to meet existing critical infrastructure needs
 - Meet the District's own needs and provide a limited contribution towards the unmet needs of the GBBCHMA, through sustainable non-Green Belt development and limited Green Belt development in Tier 1 settlements well-served by public transport
- 2.7 Both of these options are closely aligned and reflect a capacity-led approach. In other words, the overall level of growth is determined by the capacity of the suitable sites that align with the strategic approaches outlined. As opposed to the previous proposed approach (under Option B-G) of meeting a top down determined housing target (i.e our own needs plus a 4,000 contribution towards the GBBCHMA) by identifying enough sites to meet this target. Through this paper Options A-G have been updated and reappraised to align with the Council's revised plan period (2023-41) to ensure that all options can be considered on an equal basis.
- 2.8 Further details about each of the Spatial Housing Options in this consultation are given in Section 4.
- 2.9 Tables setting out what each Spatial Option could mean in terms of potential levels of growth are set out in Appendix 3.

3. Evidence used to inform Spatial Housing Options

- 3.1 In preparing a range of Spatial Housing Options, there were a number of factors that can influence where the Council will focus housing growth. These include a variety of evidence base documents and assessments, as set out below. Please note that Spatial Housing Options have been primarily led by the strategic approach they are seeking to achieve (e.g. addressing local affordability issues, giving first consideration to land well-served by public transport etc.), and have had regard to the factors below where relevant.

National Planning Policy and Guidance

- 3.2 Where relevant, the policies of the National Planning Policy Framework 2023 (the NPPF) have informed spatial options. In particular, regard has been had to:

- Prioritising the release of Green Belt which is previously developed or well-served by public transport (para 147)
- Considering the implications for sustainable development for channelling development past the Green Belt (para 147)
- Supporting housing developments that reflect local needs (para 82)
- Locating housing where it will enhance or maintain the vitality of rural communities, allowing villages to grow and thrive where this will support local services (para 83)
- Focusing significant development on locations which are or can be made sustainable through limiting the need to travel and offering a genuine choice of transport modes, whilst recognising that sustainable transport solutions will vary between urban and rural areas (para 109)
- Directing growth towards areas with the least environmental or amenity value (para 181)
- Giving great weight to the conservation and enhancement of Areas of Outstanding Natural Beauty (para 172)

The South Staffordshire Green Belt Study 2019

- 3.3 This study assessed the harm that would result to the Green Belt if land were to be released in Green Belt locations adjacent to the Black Country urban area, or in the rural area of South Staffordshire. The Council has considered this work when preparing each Spatial Option, to indicate the likely effects that would result to the Green Belt if a given strategy was pursued.

The Sustainability Appraisal (SA) of the South Staffordshire Local Plan review

- 3.4 The SA assesses the sustainability impacts that would likely result from delivering housing growth in line with the higher level Scoping Options A-F of the Issues and Options consultation (see paragraph 2.1 above).
- 3.5 Each of the Spatial Housing Options are combinations of the Scoping Options set out in the Issues and Options document. The outcomes of the Sustainability Appraisal have helped us to determine how housing growth should be distributed across the district in each of the Spatial Housing Options.

Environmental constraints

- 3.6 The Council has considered high level constraints (e.g. Flood Zone 3, natural/historic environment designations etc) which may constrain the level of growth in a broad location. Examples include where a settlement is heavily constrained by an Area of Outstanding Natural Beauty or has a greater historic character due to being largely covered by a Conservation Area; it may be appropriate to consider a lesser amount of growth in some locations to conserve these assets.

The availability of sites

- 3.7 To ensure any Spatial Option is deliverable and has a genuine choice of sites to meet a level of housing growth allocated to a broad location, we have considered sites in the Strategic Housing Land and Availability Assessment (where compatible with the strategic approach pursued in the relevant Spatial Option).

The Greater Birmingham Housing Market Area – Strategic Growth Study 2018

- 3.8 Four recommended strategic locations for growth in South Staffordshire were set out within this study, which was undertaken on a comprehensive basis across all fourteen local authorities in the housing market area. When preparing Spatial Housing Options, regard was had to the recommendations of the study as far as these could be achieved within a specific strategic approach.

Known infrastructure opportunities and needs

- 3.9 Where an infrastructure opportunity or deficit is already known within a broad location, consideration has been given as to how additional housing growth could help to meet this need when apportioning housing growth. These are set out in the Council’s Infrastructure Delivery Plan, which is being updated alongside each stage of the plan’s preparation. This consideration is most relevant to the ‘Infrastructure-led’ approach set out in Spatial Option G.

Rural Services and Facilities Audit 2021

- 3.10 This piece of work groups the district’s rural settlements by their relative level of access to services and facilities, creating a new settlement hierarchy of Tier 1-5 settlements (with Tier 5 settlements being the least sustainable in these terms). Therefore, the Spatial Options have used the findings of this work when allocating levels of growth between different Tiers in the settlement hierarchy.

Existing housing supply as at 1 April 2023

- 3.11 So that each Spatial Option has full regard to existing commitments in supply at the start of the plan period, we have factored in the existing commitments on both allocated and permitted sites within the district as of 1 April 2023 for each Spatial Option. Furthermore, **all Spatial Options assume that housing will be delivered on all existing safeguarded land allocations made through the Site Allocations Document (SAD) 2018**. These are proposed for release at an average density of 35 dwellings per net developable hectare, to ensure an efficient use of land. Taken together with existing planning permissions and other allocations, this gives a total baseline supply of approximately **3,276 dwellings** across the district as of 1 April 2023, as set out in Appendix 3.

Local affordability data

- 3.12 To recognise the specific housing supply and affordability issues experienced in certain areas of the district's rural area, local affordability ratios (i.e. the ratio of house prices to local incomes) have been examined for each of the wards in South Staffordshire. This data is set out in Appendix 1. This analysis of local affordability provides evidence as to where housing may be best directed so that residents of existing rural communities are able to access a home they can afford and continue to live in their local communities.

4. The Spatial Housing Options under consideration

- 4.1 This section sets out 9 Spatial Housing Options being considered by the Council as reasonable alternatives for the distribution of new housing growth in the Local Plan review. Each of these options represents a different approach to housing development in the district, reflecting a variety of strategic themes. The following section shows how housing growth would be distributed in line with each of these 9 Spatial Housing Options. These are presented as indicative numbers of homes that could be delivered. These are set out in full in Appendix 3.
- 4.2 Levels of growth or housing numbers are indicative and are included to give a clearer idea of what each option may deliver on the ground if certain spatial themes are followed. Site specific constraints that have emerged through the Local Plan review process are used in some cases to refine growth levels, but many spatial options' proposed distribution of housing growth does not give detailed consideration to the final capacity of site options, as the strategic decision to pursue a certain spatial strategy comes before allocations are finalised through the site assessment process.
- 4.3 Each option is accompanied by a summary of some of the key advantages and disadvantages of taking each approach. This is based on a high-level analysis of the planning merits of each option, having regard to factors such as:
- Natural and historic environmental constraints and designations
 - The Council's 2019 Green Belt Study
 - The GBBCHMA Strategic Growth Study recommendations
 - Local affordability data, population demographics and unmet needs arising from other local authorities
 - Areas of the district with greater levels of access to employment
 - The Rural Services and Facilities Audit 2021
 - The Sustainability Appraisal of the 2018 Issues and Options consultation
 - Local infrastructure opportunities that may be delivered by a certain level of growth, as set out in the Infrastructure Delivery Plan
 - The need to deliver a range of site sizes to meet national policy requirements
 - Potential availability/deliverability of land options
 - The need to give first consideration to areas well served by public transport and previously developed land when releasing Green Belt
 - Whether an option requires significantly more or less Green Belt release
- 4.4 These positives and negatives are not a detailed scoring of each option but are intended to offer a high-level summary of the key merits of each approach. Where relevant, summary information relating to the factors above is presented in Appendix 1.
- 4.5 The purpose of identifying the spatial distribution for future housing growth is to frame the strategic approach to allocating new areas for growth and to explore the district-wide consequences of different spatial approaches (e.g. focusing on areas of lower Green Belt harm, preventing further Green Belt release etc).

Common factors shared by all Spatial Housing Options

- 4.6 Whilst each Spatial Housing Option is different, some factors are shared by all Spatial Options. Firstly, all Spatial Options assume that housing supply after 1 April 2023 (the start of the plan period) will contribute to the level of development proposed in each broad location. Taken together, all existing sources of current potential housing supply (i.e. permissions, windfall allowance and current allocations) total a contribution of approximately 1,670 dwellings which will be delivered in the district between 2023 and 2041 (i.e. the proposed plan period).
- 4.7 Additionally, all Spatial Options propose to release the existing safeguarded land allocations set out in Policy SAD3 of the Site Allocations Document 2018 at an average density of at least 35 dwellings per hectare across the district. This recognises the recommendations of the Greater Birmingham Housing Market Area study, which required a minimum density of 35 dwellings per hectare to be achieved on existing non-Green Belt housing supply options in order to minimise the extent of Green Belt release required elsewhere. In total, releasing the safeguarded land allocations in this manner would, as a minimum, deliver an additional 1,604 dwellings during the proposed plan period.
- 4.8 Taking all of the above together, this means that **South Staffordshire can deliver a minimum of 3,274 dwellings during the plan period without any further release of Open Countryside and Green Belt land.**
- 4.9 Most Spatial Options assessed in this paper involve a degree of growth in the district's larger and more sustainable rural settlements, recognising the findings of the Rural Services and Facilities Audit 2021, National Planning Policy Framework (NPPF) requirements regarding sustainable transport, the need to prioritise Green Belt release in locations well-served by public transport and the support for this approach in the Sustainability Appraisal of the Issues and Options consultation¹.
- 4.10 Finally, there are some Spatial Housing Options which consider the possibility of providing a new settlement through the Local Plan review. The GBBCHMA Strategic Growth Study undertook a high-level analysis of potential locations for new settlements within the district, as part of its examination of the potential for new large-scale strategic sites within the GBBCHMA. To this end, the study identified two areas of search for a new settlement of 10,000 dwellings or more within South Staffordshire²:
- Around Dunston
 - Between Wolverhampton and Penkridge
- 4.11 Part of the rationale for identifying locations such as these is that they are adjacent to the strategic road network and a rail corridor³. This reflects national policy requirements, which (amongst other matters) state that new settlements should consider opportunities presented by existing or planned infrastructure and ensure that their site and location will allow sufficient access to employment and services in larger towns to which there is good access.
- 4.12 Therefore, given the requirements of national policy and the areas of search identified in the GBBCHMA Strategic Growth Study, the Council is only giving further consideration to accommodating growth in potential new settlement options within the A449 corridor. This recognises the presence of a significant transport corridor in this broad location and the fact

¹ Section 3.15 of the Sustainability Appraisal of the South Staffordshire Local Plan Review September 2018

² Table 5 of the GBBCHMA Strategic Growth Study

³ Paragraph 1.39 of the GBBCHMA Strategic Growth Study

that both areas of search considered in the GBBCHMA Strategic Growth Study were within this area.

- 4.13 The rationale behind the distribution proposed in each Spatial Option is set out in more the text box for each spatial option below.

The Spatial Housing Options A-I

4.14 The format for each of the Spatial Housing Options A-I is set out as follows:

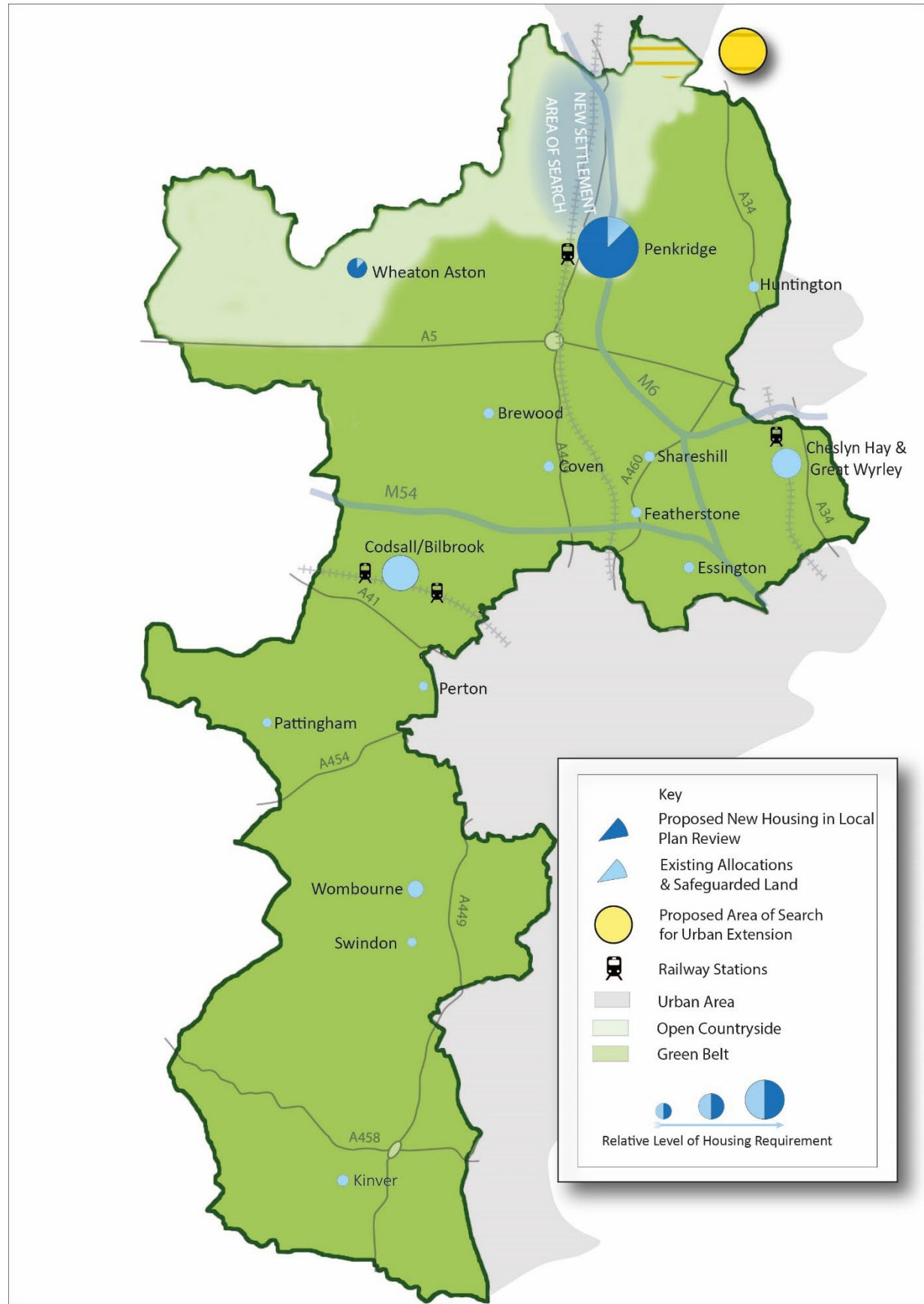
- Table with explanatory text, summary of option distribution and table showing spread of housing development by location
- Map showing proposed distribution of new allocations
- Table of advantages and disadvantages of each option

Spatial Housing Strategy Option A: Maximise available Open Countryside land release

This option has been prepared to allow the Council to consider the impacts for sustainable development of seeking to meet its housing needs by channelling growth beyond the Green Belt. It examines the additional capacity that could be met by maximising as much housing supply as possible in Open Countryside locations within the district, regardless of whether this strategy would be deliverable, accord with other national policies or be considered a sustainable pattern of development.

This option would imply significant growth on all potential Open Countryside sites around Wheaton Aston; very large urban extensions north of Penkridge and south of Stafford; and a new garden village around Dunston. In other settlements surrounded by Green Belt, additional land is only released in non-Green Belt locations (i.e. safeguarded land and suitable sites within the development boundary). If all these supply options could be maximised and had no deliverability issues the district would deliver approximately 6,484 dwellings within the plan period, providing a potential contribution to HMA unmet needs of around 2,398 dwellings.

Spatial Strategy: Option A



Spatial Housing Strategy Option A	
<p>Advantages:</p> <ul style="list-style-type: none"> ✓ Does not require Green Belt release to deliver strategy ✓ May deliver known infrastructure opportunity in Penkridge (leisure centre improvements) 	<p>Disadvantages:</p> <ul style="list-style-type: none"> ✗ Does not align growth with areas of the district with greatest sustainable access to employment (other than Penkridge) ✗ Does not deliver the majority of recommended growth areas in the GBBCHMA Strategic Growth Study ✗ Limited allocations in the rural settlements with the worst affordability to local residents ✗ Focuses urban extensions away from the two adjacent local authorities with the most significant unmet housing needs (Walsall and Wolverhampton) ✗ Does not align well to the 2018 Sustainability Appraisal, as growth is focused away from most Tier 1 and 2 villages, with large-scale growth made at a Tier 3 village instead (Wheaton Aston) ✗ Focuses significant growth in close proximity to a Special Area of Conservation west of Wheaton Aston ✗ Would allocate very large amounts of growth at Penkridge, which is a historic settlement recognised by the Historic Environment Character Assessment (HECA), in close proximity to its conservation area ✗ Growth allocated to Wheaton Aston would likely affect its historic field pattern, which is recognised in the HECA ✗ Dunston may not deliver a sustainable and deliverable new settlement in the plan period, based on current information

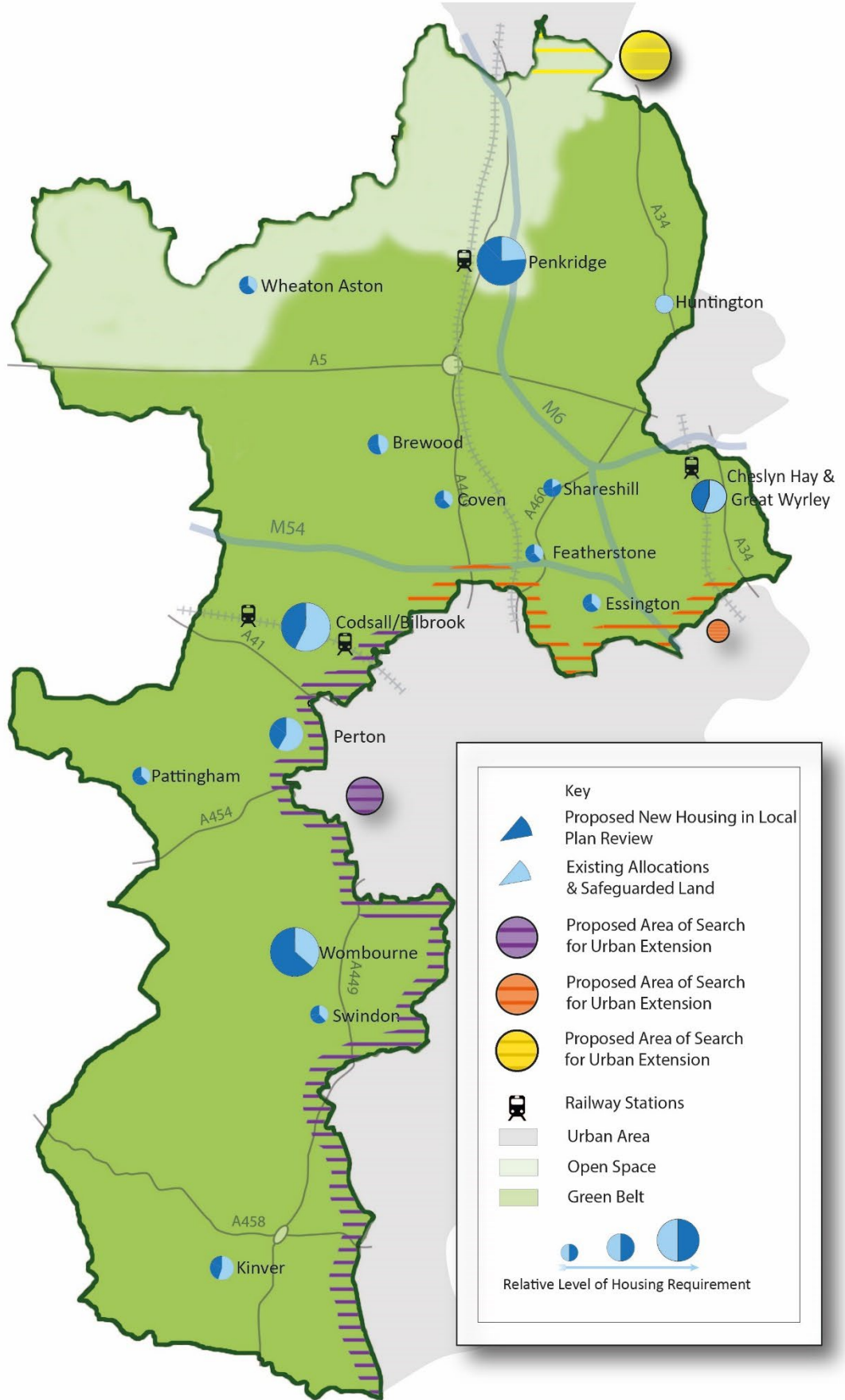
Spatial Housing Strategy Option B: Deliver 4,000 dwellings to GBBCHMA unmet needs whilst prioritising Green Belt land release in areas of lesser Green Belt harm

This option delivers enough housing growth to meet the District's local housing need and provide around a 4,000 dwelling contribution to the unmet needs of the GBBCHMA. Under this option, approximately 6,059 dwellings would be delivered in the district's rural villages, whilst around 2,144 dwellings would be delivered in urban extensions to neighbouring urban areas or the wider rural area. Additional housing growth would be allocated to broad locations where it could be delivered without the release of any 'high' or 'very high' harm areas of Green Belt, as identified in the South Staffordshire Green Belt Study 2019. This means that the growth apportioned to each broad location under this option would be accommodated on areas of Green Belt land of 'moderate – high' harm or less, or Open Countryside beyond the Green Belt where this is available.

In apportioning growth between the area's rural settlements, this option also reflects each settlement's role in the district's revised settlement hierarchy, giving higher levels of growth to higher tiers of the settlement hierarchy. Therefore, the size of new allocations to individual settlements reflects each settlement's role in the hierarchy, unless it is clear from the Green Belt Study 2019 that this level of growth would require the release of 'high' or 'very high' harm areas of Green Belt.

Equally, this option also seeks growth in areas adjacent to neighbouring towns and cities where this can be accommodated without the release of any 'high' or 'very high' harm areas of Green Belt, recognising the relative sustainability of these areas. The apportionment of growth between different areas of search for urban extensions reflects the extent to which there are opportunities to accommodate growth on less harmful Green Belt sites or areas of Open Countryside beyond the Green Belt. This option also has regard to the relative performance of the Green Belt between the district's rural settlements and the urban edge of adjacent towns and cities. This means the district's rural areas share a greater proportion of the planned growth, as they generally contain less areas of 'high' or 'very high' Green Belt harm.

Spatial Strategy: Option B



Spatial Housing Strategy Option B	
<p>Advantages:</p> <ul style="list-style-type: none"> ✓ Delivers significant growth adjacent to Tier 1 settlements, which have greater levels of access to employment than other rural settlements ✓ Delivers significant additional growth in rural settlements with the worst affordability for local residents (Codsall/Bilbrook, Brewwood, Kinver, Wombourne) ✓ Partially aligns with the 2018 Sustainability Appraisal, by focusing more additional growth across a variety of small to large urban extensions ✓ May deliver some known infrastructure opportunities in Penkrige (leisure centre improvements) and Brewwood (car parking) ✓ Aligns some growth with areas which are better served by public transport (Tier 1 settlements and urban extensions adjacent to neighbouring towns and cities) 	<p>Disadvantages:</p> <ul style="list-style-type: none"> ✗ Delivers very little growth on the Black Country's northern edge, despite greater bus access to employment in this area ✗ Delivers significantly less growth adjacent to local authorities with the most significant unmet housing needs (Walsall and Wolverhampton) when compared to other options ✗ Does not reflect the 2018 Sustainability Appraisal in rural settlements specifically, as growth is more evenly spread across Tier 1-4 settlements ✗ Allocates significant growth at historic settlements recognised by the Historic Environment Character Assessment and with extensive conservation areas (Brewwood, Kinver and Penkrige) ✗ Growth on the western edge of the Black Country may involve allocations in close proximity to a registered park and garden ✗ Requires Green Belt release to deliver strategy

Spatial Housing Strategy Option C:**Deliver 4,000 dwellings to GBBCHMA unmet needs whilst carrying forward the existing Core Strategy strategic approach to distribution**

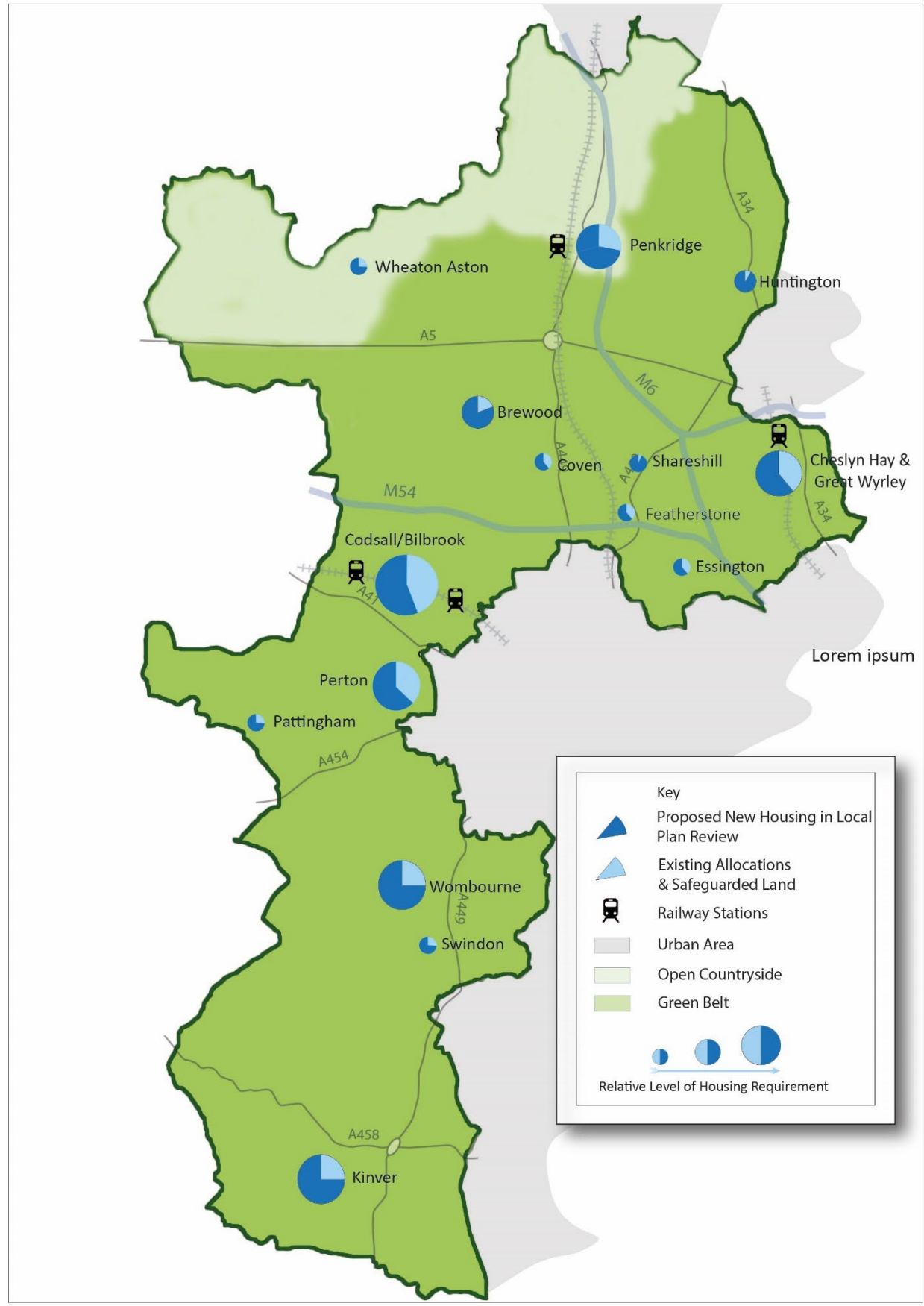
This option delivers enough housing growth to meet the District's local housing need and provide around a 4,000 dwelling contribution to the unmet needs of the GBBCHMA. Under this option around 8,040 dwellings would be delivered in the district's rural villages, with around 7,223 dwellings being directed to Tier 1 & 2 settlements and approximately 788 dwellings would be directed to Tier 3 villages.

This option adopts an approach similar to the 90/10 distribution of growth between the Main and Local Service Villages previously identified in the adopted Core Strategy. To achieve this, this option proposes that around 90% of growth in the plan period (excluding windfall supply and existing commitments outside of settlements) occurs in the District's Tier 1 and 2 settlements. This recognises that these locations are largely the same as the previous Main Service Villages which took 90% of growth in the Core Strategy. New land allocations are split evenly between all Tier 1 and 2 villages under this option, recognising that the previous spatial strategy did not split Main Service Villages into Tier 1 and 2 villages (unlike the most recent Rural Services and Facilities Audit).

The remaining 10% of housing growth is focused towards the district's Tier 3 villages, as these are largely the same settlements as the previous Local Service Villages which took 10% of growth in the Core Strategy. New land allocations to meet this 10% requirement would be split equally between all Tier 3 villages.

This option does not allocate any growth in areas which would require urban extensions of the Black Country authorities or other neighbouring towns. This recognises that such areas were not identified for growth in the previous spatial strategy. For similar reasons, no new settlements are proposed in this option.

Spatial Strategy: Option C



Spatial Housing Strategy Option C	
<p>Advantages:</p>	<p>Disadvantages:</p>
<ul style="list-style-type: none"> ✓ Delivers part of its planned growth adjacent to Tier 1 settlements, which have greater levels of access to employment than other rural settlements ✓ Allocates growth in some areas recommended by the GBBCHMA Strategic Growth Study (specifically in Codsall/Bilbrook and Penkridge) ✓ Delivers significant growth in rural settlements with the worst affordability for local residents (Codsall/Bilbrook, Brewood, Kinver, Wombourne) ✓ May deliver infrastructure needs in Codsall/Bilbrook (first school) and Penkridge (leisure centre improvements) ✓ Aligns some growth with areas best served by public transport (Tier 1 settlements) 	<ul style="list-style-type: none"> ✗ Does not deliver any growth on the Black Country's northern edge, despite greater bus access to employment in this area ✗ Will likely require significant allocations in Green Belt areas of high or very high harm at Codsall/Bilbrook, Perton, Huntington and Cheslyn Hay/Great Wyrley ✗ Does not reflect recommendations of the GBBCHMA Strategic Growth Study in the i54/ROF Featherstone corridor or on the western edge of the Black Country ✗ Does not deliver any growth adjacent to local authorities with considerable unmet housing needs (Walsall and Wolverhampton) ✗ Does not align well with 2018 Sustainability Appraisal, as it prioritises significant levels of growth to Tier 3 settlements, whilst no growth is delivered in more sustainable urban extensions to neighbouring towns and cities ✗ Results in significant levels of growth in areas with less sustainable access to employment (e.g. Tier 2/3 villages) ✗ Level of growth at Huntington would deliver significant development in/adjacent to Cannock Chase Area of Outstanding Natural Beauty ✗ Allocates strategic sites at historic settlements recognised by the Historic Environment Character Assessment and with extensive conservation areas (Brewood, Kinver and Penkridge) ✗ Relies heavily on small/medium sites, with little/no scope for larger sites to deliver growth towards the end of the plan period ✗ Requires Green Belt release to deliver strategy

Spatial Housing Strategy Option D:

Deliver 4,000 dwellings to GBBCHMA unmet needs whilst maximising delivery in housing growth locations identified in the GBBCHMA Strategic Growth Study

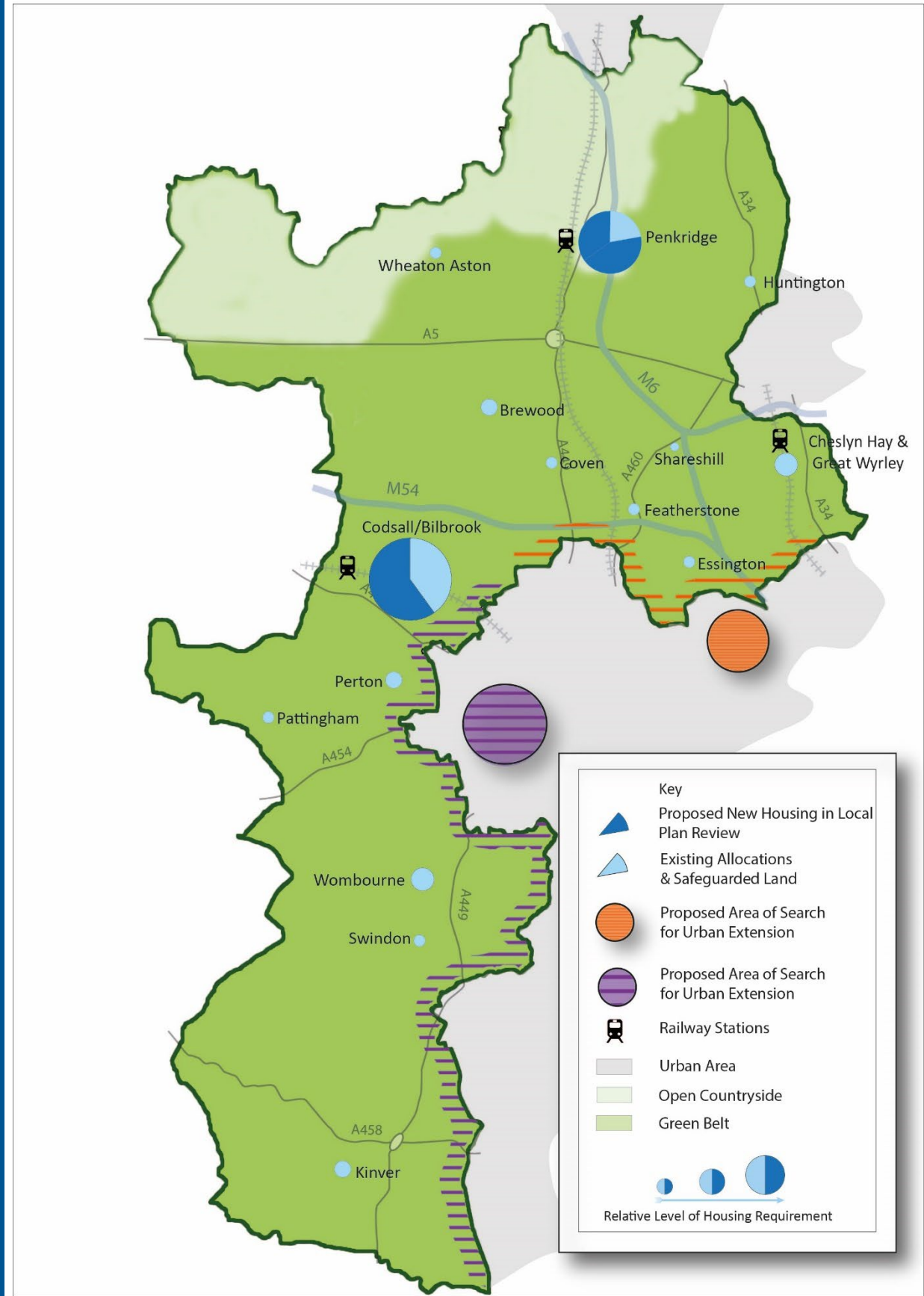
This option delivers enough housing growth to meet the District's local housing need and provide around a 4,000 dwelling contribution to the unmet needs of the GBBCHMA. Under this option, growth is maximised at villages identified as having potential for strategic levels of growth in the GBBCHMA Strategic Growth Study, namely Penkridge and Codsall/Bilbrook. A single urban extension would be accommodated in the area to the north of the Black Country conurbation (in the i54/ROF Featherstone corridor) whilst smaller urban extensions are allocated to the Black Country conurbation's western edge. These reflect the opportunities for employment-led housing growth and dispersed housing sites in these locations in the Strategic Growth Study. Under this option around 5,184 dwellings would be delivered in the district's rural villages and approximately 3,069 dwellings would be delivered in urban extensions to neighbouring urban areas or the wider rural area.

The key locations identified in the 2018 GBBCHMA Strategic Growth Study within South Staffordshire are as follows:

- Urban extension: North of Penkridge (1,500 – 7,500 dwellings)
- Urban extension (employment-led): North of Wolverhampton in the vicinity of i54 (1,500 – 7,500 dwellings)
- Dispersed housing sites: Western edge of the conurbation between Stourbridge and Wolverhampton (500 – 2,500 dwellings)
- Dispersed housing sites: North of Codsall/Bilbrook (500 – 2,500 dwellings)

In each of these locations, this option seeks to maximise the amount of growth likely to be realised within the plan period (i.e. up to 2041).

Spatial Strategy: Option D



Spatial Housing Strategy Option D	
<p>Advantages:</p> <ul style="list-style-type: none"> ✓ Closely aligns growth to areas of the district with greater levels of access to employment (north of the Black Country, Tier 1 settlements, the A449 corridor) ✓ Allocates growth in areas recommended by the GBHMA Strategic Growth Study, where there is available land to deliver these recommendations ✓ Focuses urban extensions to the north of the Black Country, where a border is shared with the two adjacent local authorities with the most significant unmet housing needs (Walsall and Wolverhampton) ✓ Aligns well with the 2018 Sustainability Appraisal typologies, by focusing additional growth in Tier 1 and 2 settlements and urban extensions ✓ May deliver infrastructure needs in Codsall/Bilbrook (first school) and Penkridge (leisure centre improvements) ✓ Aligns some growth with areas best served by public transport (Tier 1 settlements) 	<p>Disadvantages:</p> <ul style="list-style-type: none"> ✗ Will likely require significant allocations in Green Belt areas of high or very high harm in Codsall/Bilbrook and north of the Black Country conurbation ✗ Does not deliver significant additional growth in rural settlements with the worst affordability for local residents (Brewood, Wombourne, Kinver) ✗ Would allocate very large amounts of growth at Penkridge, which is a historic settlement recognised by the Historic Environment Character Assessment (HECA), in close proximity to its conservation area ✗ This scale of growth would likely result in significant allocations being made in close proximity to the well-preserved conservation area in Codsall ✗ Requires Green Belt release to deliver strategy

Spatial Housing Strategy Option E:**Deliver 4,000 dwellings to GBBCHMA unmet needs whilst focusing growth on areas which address local affordability issues and settlements with the greatest needs**

This option delivers enough housing growth to meet the District's local housing need and provide around a 4,000 dwelling contribution to the unmet needs of the GBBCHMA. This option seeks to distribute new housing growth in a manner which reflects the locations from which housing needs are generated, having regard to local affordability ratios and the location of unmet needs arising from neighbouring authorities. Unlike the options which deliver the 4,000 dwelling contribution whilst reflecting local infrastructure opportunities and environmental constraints (e.g. Spatial Option G) or which reflect the findings of a strategic cross-authority study of sustainability and environmental/Green Belt capacity (e.g. Spatial Housing Options D), this option focuses solely on how housing growth may be distributed to meet needs where they arise.

Growth to the villages is dispersed across all four village tiers under this option, with allocations only being made within each tier at the district's less affordable rural settlements. The remainder of housing growth is focused in urban extensions. Large urban extensions are focused to the north of the Black Country conurbation recognising that this broad location sits in close proximity to Wolverhampton and Walsall, which have unmet housing needs. The remaining housing requirement is split between the western edge of the Black Country and Cannock, recognising that these areas adjacent to local authorities where unmet housing needs are less acute, but that these broad locations are nonetheless adjacent to major population centres within the same housing market area as South Staffordshire.

Under this option around 4,401 dwellings would be delivered in the district's rural villages and approximately 3,844 dwellings would be delivered in urban extensions to neighbouring urban areas or the wider rural area. The split between village growth and urban extensions seeks to provide a split between the amount of dwellings delivered adjacent to neighbouring areas and the rural settlements of South Staffordshire which is broadly consistent with the split between the district's own needs and the unmet needs of other areas (i.e. the 4,000 dwelling contribution to the GBBCHMA).

Spatial Strategy: Option E



Lorem ipsum

Spatial Housing Strategy Option E	
<p>Advantages:</p> <ul style="list-style-type: none"> ✓ Delivers significant growth adjacent to the northern edge of the Black Country, which has greater levels of bus access to employment ✓ Allocates growth in some areas recommended by the GBBCHMA Strategic Growth Study (specifically in the ROF/i54 corridor and the western edge of the Black Country conurbation) ✓ Delivers growth in rural settlements with the worst affordability for local residents (Codsall/Bilbrook, Brewood, Kinver, Wombourne) ✓ Focuses urban extensions to the north of the Black Country, where a border is shared with the two adjoining local authorities with the most significant unmet housing needs (Walsall and Wolverhampton) ✓ Partially reflects the 2018 Sustainability Appraisal, by focusing a large proportion of additional growth to urban extensions ✓ Partially aligns growth with areas which are better served by public transport (urban extensions to neighbouring towns and cities) 	<p>Disadvantages:</p> <ul style="list-style-type: none"> ✗ Will likely require allocations in Green Belt areas of high or very high harm to the north of the Black Country conurbation ✗ Does not focus growth in rural settlements to Tier 1 settlements, which have greater levels of access to employment ✗ Does not reflect recommendations of the GBBCHMA Strategic Growth Study north of Penkridge and at Codsall/Bilbrook ✗ Allocates strategic sites at historic settlements recognised by the Historic Environment Character Assessment and with extensive conservation areas (Brewood and Kinver) ✗ Growth on the western edge of the Black Country may involve allocations in close proximity to a registered park and garden ✗ Does not focus growth on rural settlements best served by public transport (Tier 1 settlements) ✗ Requires Green Belt release to deliver strategy

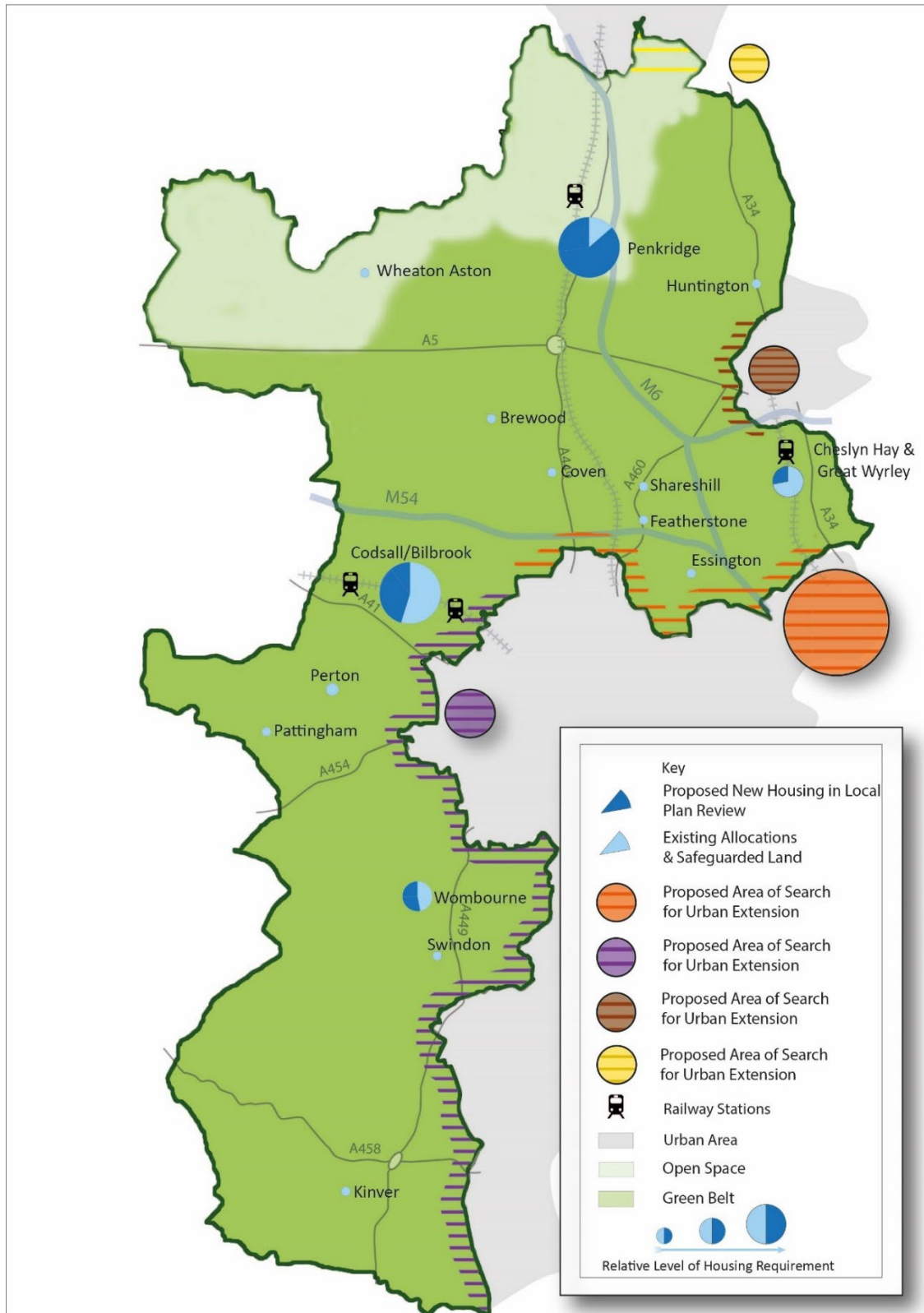
**Spatial Housing Strategy Option F:
Deliver 4,000 dwellings to GBBCHMA unmet needs whilst prioritising Green Belt land which is previously developed or (comparatively) well-served by public transport**

This option delivers enough housing growth to meet the District's local housing need and provide around a 4,000 dwelling contribution to the unmet needs of the GBBCHMA. Under this option around 4,624 dwellings would be delivered in the district's rural villages and approximately 3,625 dwellings would be delivered in urban extensions to neighbouring urban areas or the wider rural area. Additional allocations are only made to villages with the best public transport links (i.e. Tier 1 villages with rail access) or villages with significant amounts of available previously developed land in the Green Belt (i.e. Wombourne). The remaining plan requirement is allocated to sites on the fringes of housing market area towns and cities (i.e. the Black Country and Cannock), recognising that these settlements offer shorter bus trips to higher order service centres in these areas.

The aim of this Spatial Option is to present a strategy that focuses primarily on the NPPF requirement to give first consideration to *"land which has been previously developed and/or is well-served by public transport"* when releasing Green Belt, whilst also ensuring that enough Green Belt land is released to deliver 4,000 dwellings to the unmet needs of the GBBCHMA. Therefore, additional allocations are only made to settlements with the best public transport links (i.e. Tier 1 settlements) or settlements with significant opportunities to expand onto previously developed land in the Green Belt, subject to land availability issues being addressed (i.e. Wombourne). The remaining plan requirement is allocated to sites on the fringes of housing market area towns and cities (i.e. the Black Country and Cannock). Accommodating the remainder of the housing target on the urban fringe recognises that, compared to rural villages without rail links, these areas offer public transport links in the closest proximity to higher order service centres in these areas.

This Spatial Option also releases an amount of land within the wider Open Countryside which has regard to *"the consequences for sustainable development of channelling development ... towards locations beyond the outer Green Belt boundary"*, in accordance with the NPPF. To achieve this, allocations are also made within Open Countryside locations where there is available and potentially deliverable land to deliver growth through urban extensions or allocations to Tier 1 settlements. This recognises that such Tier 1 settlements and urban extensions to neighbouring areas performed particularly well in the 2018 Issues and Options consultation Sustainability Appraisal.

Spatial Strategy: Option F



Spatial Housing Strategy Option F	
<p>Advantages:</p> <ul style="list-style-type: none"> ✓ Closely aligns growth to areas of the district with greater levels of sustainable access to employment (north of the Black Country, Tier 1 settlements) ✓ Allocates growth in areas recommended by the GBBCHMA Strategic Growth Study, where there is available land to deliver these recommendations ✓ Delivers growth in some of the rural settlements with the worst affordability for local residents (Codsall/Bilbrook, Wombourne) ✓ Aligns well with the 2018 Sustainability Appraisal, by focusing more additional growth in Tier 1 and 2 settlements and urban extensions ✓ Focuses urban extensions to the north of the Black Country, where a border is shared with the two adjoining local authorities with the most significant unmet housing needs (Walsall and Wolverhampton) ✓ May deliver infrastructure needs in Codsall/Bilbrook (first school) and Penkridge (leisure centre improvements) ✓ Aligns some growth with areas best served by public transport (Tier 1 settlements) ✓ May facilitate delivery of brownfield Green Belt land at Wombourne (if available and deliverable) 	<p>Disadvantages:</p> <ul style="list-style-type: none"> ✗ Will likely require allocations in Green Belt areas of high or very high harm in Codsall/Bilbrook and north of the Black Country conurbation ✗ Does not deliver additional growth in Brewood, despite it having one of the worst affordability ratios for local residents or in Perton ✗ Would allocate larger amounts of growth in a historic settlement recognised by the Historic Environment Character Assessment (Penkridge), in close proximity to its conservation area ✗ Growth on the western edge of the Black Country may involve allocations in close proximity to a registered park and garden ✗ Brownfield Green Belt land at Wombourne unlikely to be deliverable, creating a shortfall against housing targets. ✗ Requires Green Belt release to deliver strategy

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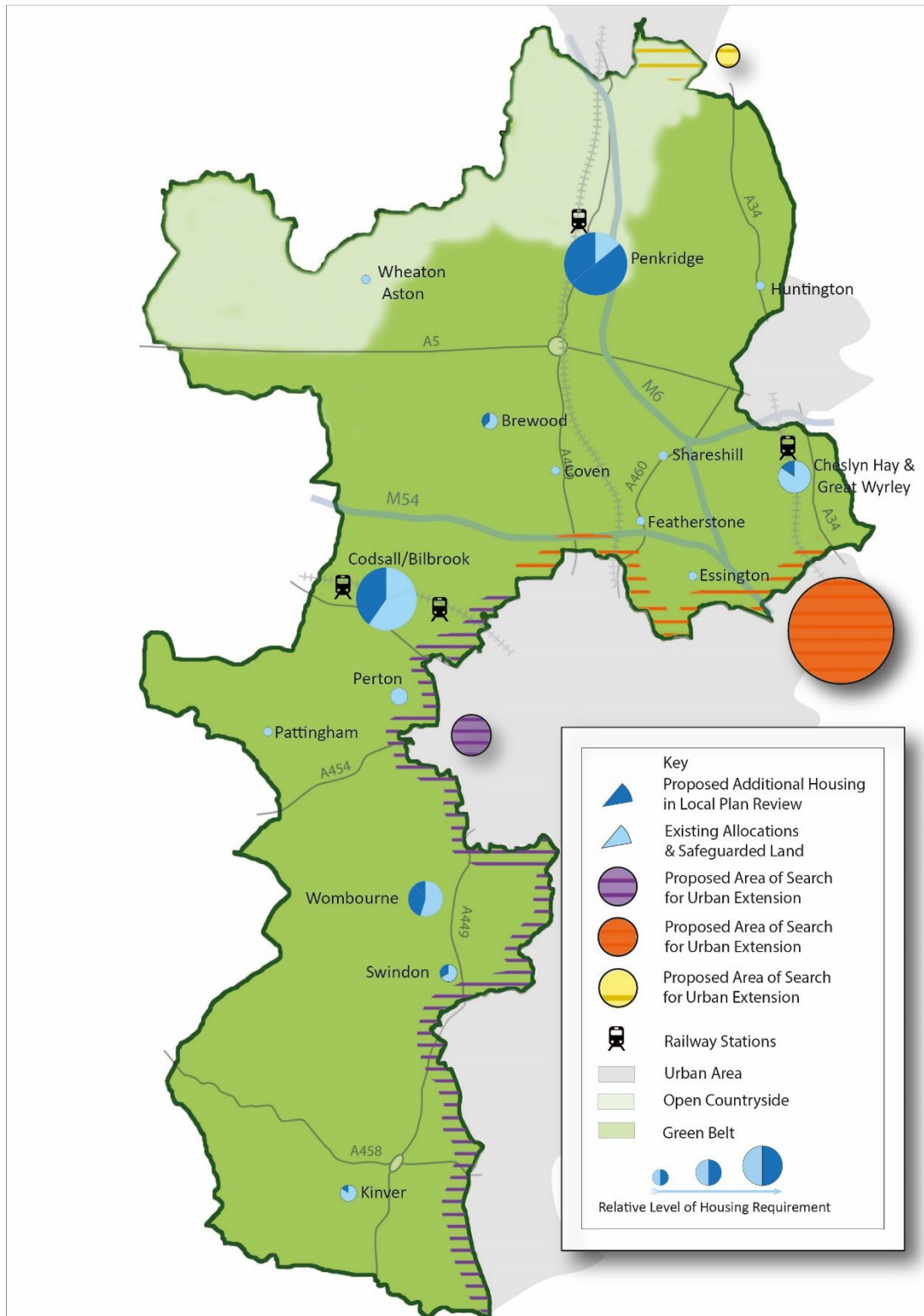
Spatial Housing Strategy Option G: Deliver 4,000 dwellings to GBBCHMA unmet needs whilst delivering infrastructure-led development

This option delivers enough housing growth to meet the district's local housing need and provide around a 4,000 dwelling contribution to the unmet needs of the GBBCHMA. Under this option around 4,668 dwellings would be delivered in the district's rural villages and 3,515 dwellings would be delivered in urban extensions to neighbouring urban areas or the wider rural area. Growth on strategic sites would be prioritised in locations where it could help to meet local infrastructure needs and opportunities, with smaller allocations being made in other broad locations having regard to their local environmental constraints. Urban extensions are provided across all neighbouring authorities within the GBBCHMA with unmet housing needs to ensure that the district's contribution to the GBBCHMA shortfall is met in locations from which households are being displaced.

Growth in the villages is dispersed across village tiers 1-3 under this option. A larger proportion of housing growth is focused on Tier 1 and 2 villages where significant opportunities to achieve infrastructure improvements through new development exist, having regard to other environmental constraints (e.g. historic settlements with extensive Conservation Areas or settlements constrained by a designated landscape).

Larger urban extensions are focused to the north of the Black Country conurbation, recognising the availability of larger sites in this location and the opportunities to deliver strategic infrastructure needs around the ROF strategic employment site. The remaining housing requirement is split between the western edge of the Black Country and south of Stafford, in a manner that recognises the Black Country's role in contributing to the unmet housing needs of the HMA.

Spatial Strategy: Option G



Spatial Housing Strategy Option G	
<p>Advantages:</p> <ul style="list-style-type: none"> ✓ Closely aligns growth to areas of the district with greater levels of access to employment (north of the Black Country, Tier 1 settlements) ✓ Allocates growth in areas recommended by the GBBCHMA Strategic Growth Study, where there is available land to deliver these recommendations ✓ Delivers growth in some of the rural settlements with the worst affordability for local residents (Codsall/Bilbrook, Brewwood, Kinver, Wombourne) ✓ Focuses urban extensions to the north of the Black Country, where a border is shared with the two adjoining local authorities with the most significant unmet housing needs (Walsall and Wolverhampton) ✓ Aligns well with the 2018 Sustainability Appraisal, by focusing more additional growth in Tier 1 and 2 settlements and urban extensions ✓ Delivers infrastructure needs in Codsall/Bilbrook (first school) and Penkrige (leisure centre improvements) ✓ Aligns growth with areas well served by public transport (Tier 1 settlements) 	<p>Disadvantages:</p> <ul style="list-style-type: none"> ✗ Will likely require allocations in Green Belt areas of high or very high harm in Codsall/Bilbrook and north of the Black Country conurbation ✗ Would allocate larger amounts of growth in a historic settlement recognised by the Historic Environment Character Assessment (Penkrige), in close proximity to its conservation area ✗ Growth on the western edge of the Black Country may involve allocations in close proximity to a registered park and garden ✗ Requires significant Green Belt release to deliver strategy

Spatial Housing Strategy Option H:

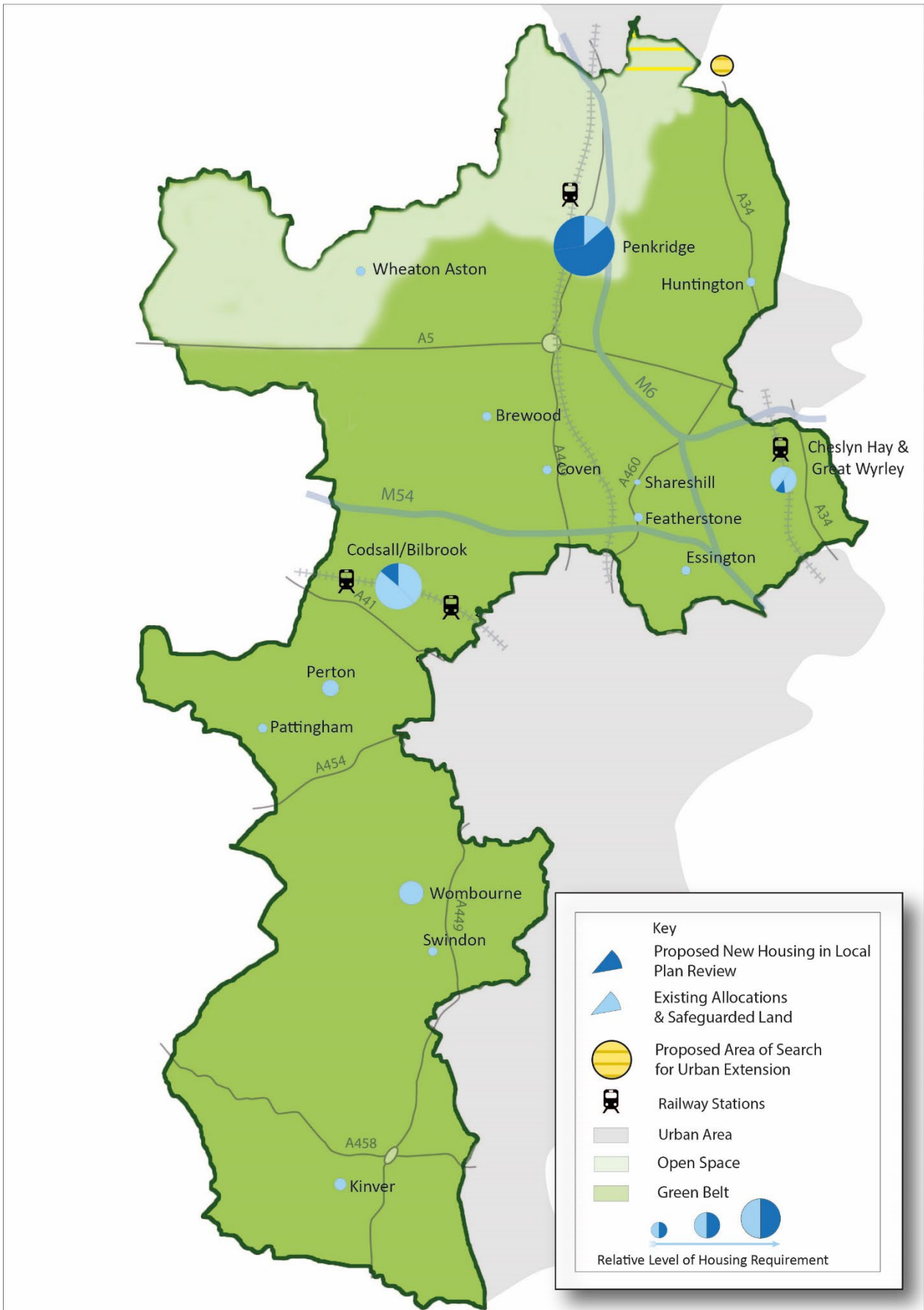
Meet the District's own housing needs only, through sustainable non-Green Belt development and limited Green Belt development only to meet existing critical infrastructure needs

This option meets the district's own local housing need across the revised plan period of 2023-2041 but does not deliver enough housing growth to provide a contribution to the unmet needs of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). Under this option, new housing growth to meet local housing needs is limited solely to sustainable and deliverable allocations in non-Green Belt locations, including safeguarded land and Open Countryside sites.

Under this option housing growth during the plan period would be focused on the district's rural villages. The majority of new housing growth would be located in the District's Tier 1 settlements, particularly in Penkridge and Codsall/Bilbrook. Green Belt allocations for housing are only made where this would be necessary for the delivery of critical infrastructure, specifically to facilitate new education infrastructure in the Codsall/Bilbrook area. This follows the NPPF's statement that Green Belt boundaries are not required to be reviewed or changed when plans are being prepared and updated and that it is authorities' choice to review Green Belt boundaries if they consider exceptional circumstances exist, meaning that Green Belt is only released for housing under this option if strictly necessary to achieve delivery of critical infrastructure.

This Spatial Option also releases an amount of land within the wider Open Countryside which has regard to *"the consequences for sustainable development of channelling development ... towards locations beyond the outer Green Belt boundary"*, in accordance with the NPPF. New allocations in the Open Countryside are therefore focused into suitable and potentially deliverable land adjacent to Tier 1 settlements and neighbouring towns and cities. This recognises that Tier 1 and 2 settlements and extensions to neighbouring towns and cities performed particularly well in the 2018 Issues and Options consultation Sustainability Appraisal.

Spatial Strategy: Option H



Spatial Housing Strategy Option H	
<p>Advantages:</p> <ul style="list-style-type: none"> ✓ Closely aligns growth to areas of the district with greater levels of access to employment (Tier 1 settlements) ✓ Aligns well with the 2018 Sustainability Appraisal, by focusing more additional growth in Tier 1 and 2 settlements ✓ Delivers infrastructure needs in Codsall/Bilbrook (first school) and Penkridge (leisure centre improvements) ✓ Aligns growth with areas well served by public transport (Tier 1 settlements) ✓ Only releases Green Belt to meet critical infrastructure needs in Codsall/Bilbrook 	<p>Disadvantages:</p> <ul style="list-style-type: none"> ✗ Will likely require allocations in Green Belt areas of high harm in Codsall/Bilbrook to deliver critical infrastructure needs ✗ Would allocate larger amounts of growth in a historic settlement recognised by the Historic Environment Character Assessment (Penkridge), in close proximity to its conservation area ✗ Does not deliver the majority of recommended growth areas in the GBBCHMA Strategic Growth Study

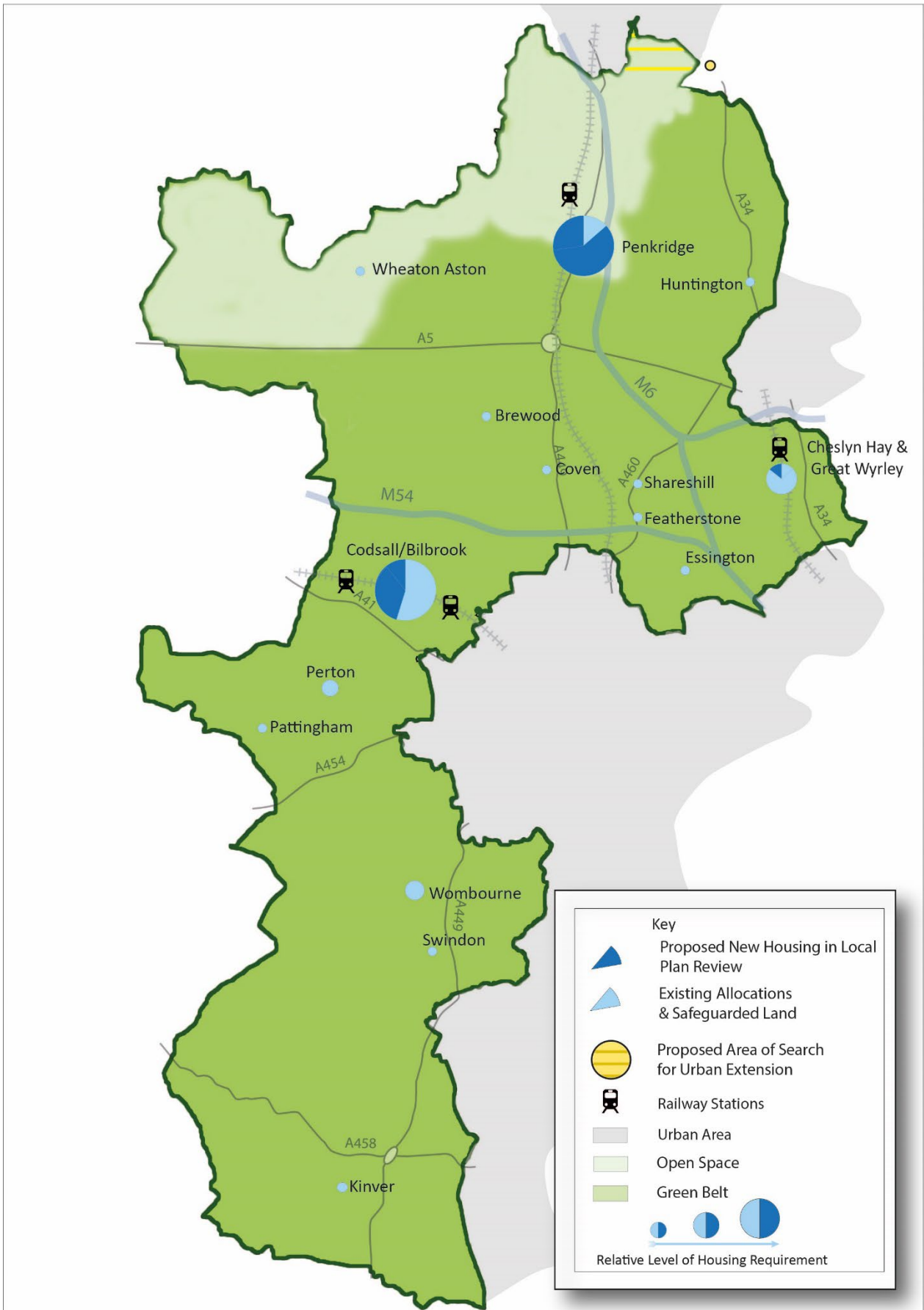
Spatial Housing Strategy Option I:**Meet the District's own needs and provide a limited contribution towards the unmet needs of the GBBCHMA, through sustainable non-Green Belt development and limited Green Belt development in Tier 1 settlements well-served by public transport**

This option meets the district's own local housing need across the revised plan period of 2023-2041 and delivers enough housing growth to provide a contribution of around 640 dwellings to the unmet needs of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). Under this option, new housing growth is primarily focused on sustainable and deliverable allocations in non-Green Belt locations, including safeguarded land and Open Countryside sites, alongside additional Green Belt allocations made adjacent to Tier 1 settlements.

Under this option housing growth during the plan period would be focused on the district's rural villages. The majority of new housing growth would be located in the District's Tier 1 settlements, particularly in Penkridge and Codsall/Bilbrook. Green Belt allocations for housing are only made on sites which can be made suitable and deliverable adjacent to Tier 1 settlements, having regard to local site constraints and infrastructure capacity. This approach reflects the NPPF statement that Green Belt boundaries are not required to be reviewed or changed when plans are being prepared and updated and that it is authorities choice to review Green belt boundaries if they consider exceptional circumstances exist. It balances this against the NPPF's steer that, should Green Belt boundary changes be considered, first consideration should be given to areas well-served by public transport and previously developed land.

This Spatial Option also releases an amount of land within the wider Open Countryside which has regard to *"the consequences for sustainable development of channelling development ... towards locations beyond the outer Green Belt boundary"*, in accordance with the NPPF. New allocations in the Open Countryside are therefore focused into suitable and potentially deliverable land adjacent to Tier 1 settlements and neighbouring towns and cities. This recognises that Tier 1 and 2 settlements and extensions to neighbouring towns and cities performed particularly well in the 2018 Issues and Options consultation Sustainability Appraisal.

Spatial Strategy: Option I



Spatial Housing Strategy Option I	
<p>Advantages:</p> <ul style="list-style-type: none"> ✓ Closely aligns growth to areas of the district with greater levels of access to employment (Tier 1 settlements) ✓ Aligns well with the 2018 Sustainability Appraisal, by focusing more additional growth in Tier 1 and 2 settlements ✓ Delivers infrastructure needs in Codsall/Bilbrook (first school) and Penkridge (leisure centre improvements) ✓ Maximises suitable opportunities to align growth with areas well served by public transport (Tier 1 settlements) ✓ Only releases limited Green Belt in Tier 1 settlements to maximise housing in the District's most sustainable settlements and deliver critical infrastructure ✓ Delivers the GBBCHMA Strategic Growth Study recommendations in Codsall/Bilbrook and Penkridge 	<p>Disadvantages:</p> <ul style="list-style-type: none"> ✗ Will likely require allocations in Green Belt areas of high harm in Codsall/Bilbrook ✗ Would allocate larger amounts of growth in a historic settlement recognised by the Historic Environment Character Assessment (Penkridge), in close proximity to its conservation area ✗ Doesn't deliver the GBBCHMA Strategic Growth Study recommendations for employment-led growth of proportionate dispersal along the western edge of the Black Country

5. Conclusions on the Spatial Housing Options

The Council's Preferred Spatial Housing Strategy

- 5.1 Section 4 of this document set out a number of different ways in which housing could be distributed across South Staffordshire. This includes a range of different approaches to accommodating housing development in the district, based upon different strategic approaches. Some (Options B to G) offer different approaches to meet the District's own needs plus 4,000 dwellings towards the GBBCHMA, reflecting the minimum level of growth implied within South Staffordshire by the spatial recommendations of the 2018 GBBCHMA Strategic Growth Study. Others consider strategies for different levels of growth based on capacity-led approaches (Options A, H and I).
- 5.2 Having considered all the different approaches and their relative merits in the round, the Council's preferred approach is Spatial Option I, i.e. a capacity-led approach focusing growth to Green Belt sites around Tier 1 settlements. This represents a sound and sustainable strategy for accommodating the required amount of housing in the district by 2041 that best balances the district's growth opportunities with national policy. The strategy recognises the pressing need to deliver additional housing, whilst balancing this against the constraint that Green Belt land in the district places on the plan's ability to deliver housing growth.
- 5.3 Spatial Option I does not propose to completely avoid Green Belt release, despite national policy allowing for such an approach and indicating any Green Belt release is solely the choice of the council. However, it does propose to limit Green Belt allocations to suitable sites in areas of the district best served by public transport, which the NPPF specifies are to be given first consideration for Green Belt release. Local evidence shows the District's Tier 1 settlements are the areas best served by public transport in the district, particularly where these transport links offer sustainable commuting patterns into the neighbouring Black Country and Birmingham conurbation.
- 5.4 The final level of housing growth to be delivered by this strategy has been determined through the assessment of housing sites, as set out in the Council's Housing Site Assessment Topic Paper 2024. Under this spatial strategy Green Belt sites are identified adjacent to the District's Tier 1 settlements where they are otherwise free from significant constraints and are within walking distance of these settlement's train stations. However, reasonable alternative Green Belt site options have still be considered in other areas of the District (i.e. Tier 2-4 settlements and areas of search for urban extensions). This ensures that the site-specific merits of reasonable alternatives to the Council's preferred strategy have been fully considered before final decisions being made on proposed allocations.
- 5.5 Before deciding on this strategic approach the Council has engaged in regular Duty to Cooperate meetings with other GBBCHMA local authorities to establish the approach of other local authorities to the recent proposed NPPF changes, which were subsequently confirmed in December 2023. It has also written to other GBBCHMA Councils, requesting they indicate what their views would be if the Council were to propose a strategy that reduced or removed Green Belt release sites to meet housing needs from the plan. To date it has not received any alternative suggested strategic approaches from these Duty to Cooperate bodies. Therefore, given the need to urgently progress a local plan before the government's June 2025 deadline

for local plan submission, the Council proposes to progress the plan using the preferred Spatial Option I.

Appendix 1

Strategic Policy and Physical Constraints

Contents

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1. South Staffordshire Green Belt Study 2019

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

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

1.2 The NPPF establishes that, once established, Green Belts should only be altered in exceptional circumstances, which case-law⁴ establishes requires consideration of the nature and extent of harm to the Green Belt. To this end, the Council jointly commissioned a Green Belt Study with the Black Country authorities. The South Staffordshire portion of this study is the South Staffordshire Green Belt Study 2019. This examines which areas of the District perform the five purposes of the Green Belt to a greater or lesser extent, before considering the potential harm to the Green Belt of releasing areas of Green Belt for development. The findings of this study are summarised against each broad location below.

1.3 Tier 1 Settlements

Penkridge

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

Codsall/Bilbrook

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

Cheslyn Hay/Great Wyrley

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

⁴ Calverton Parish Council v Greater Nottingham Councils & others (2015)

1.4 Tier 2 Settlements

Wombourne

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

Brewood

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

Kinver

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

Perton

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

Huntington

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

1.5 Tier 3 Settlements

Essington

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

Coven

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

Featherstone

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

Shareshill

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

Wheaton Aston

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

Pattingham

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

Swindon

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

1.6 Tier 4 Settlements

Bednall

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

Bishops Wood

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

Bobbington

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

Dunston

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

Himley

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

Trysull

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

Seisdon

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

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

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

1.8 Urban Extension/New Settlement areas of search

North of Black Country

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

West of Black Country

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

South-west of Cannock

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

South of Stafford

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

A449/West Coast Mainline corridor new settlement area of search

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

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

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

2. Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Strategic Growth Study findings

- 2.1 National planning policy, guidance and the Localism Act 2011 require local authorities to work together through the 'Duty to Cooperate' to meet housing needs across the relevant geography to ensure housing needs are met. South Staffordshire sits within a well-established functional housing market area with thirteen other local authorities around the West Midlands conurbation, which is known as the Greater Birmingham and Black Country Housing Market Area (GBBCHMA).
- 2.2 A joint study (the 2018 GBBCHMA Strategic Growth Study) was prepared across all fourteen GBBCHMA local authorities. This estimates the extent of the housing shortfall across the GBBCHMA, concluding that this shortfall largely arose from Birmingham and the Black Country authorities and that it couldn't be accommodated on existing policy-compliant sites identified for housing in those areas. It then went on to identify a range of potential development options both within the Green Belt and beyond which may assist in meeting this shortfall on a comprehensive basis across the GBBCHMA, assessing which were the most sustainable and deliverable options for meeting the housing shortfall.
- 2.3 Areas assessed as potential strategic growth locations in the study are depicted in Figures 1 and 2 on the following pages. It should be noted that the study is now over 5 years old since its publication in 2018 and doesn't reflect recent changes to the NPPF which indicate that Green Belt release is not required. Equally, many HMA authorities have progressed local plans which do not deliver all (or any) of its recommended strategic growth locations, particularly where these would involve Green Belt loss. Notwithstanding these factors, the study is still the only consistent assessment of Green Belt, housing need, sustainability and deliverability across the GBBCHMA to date.

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

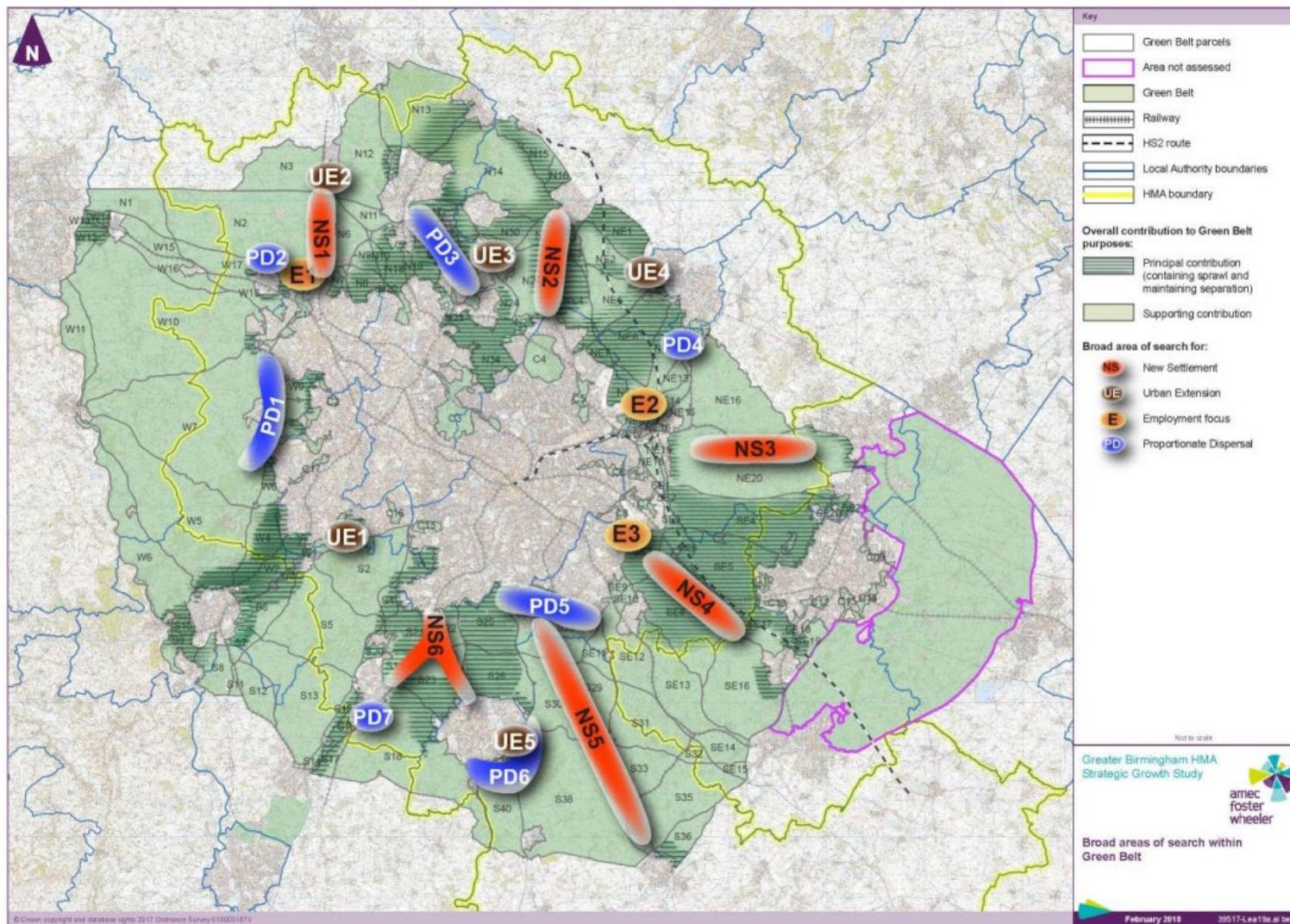
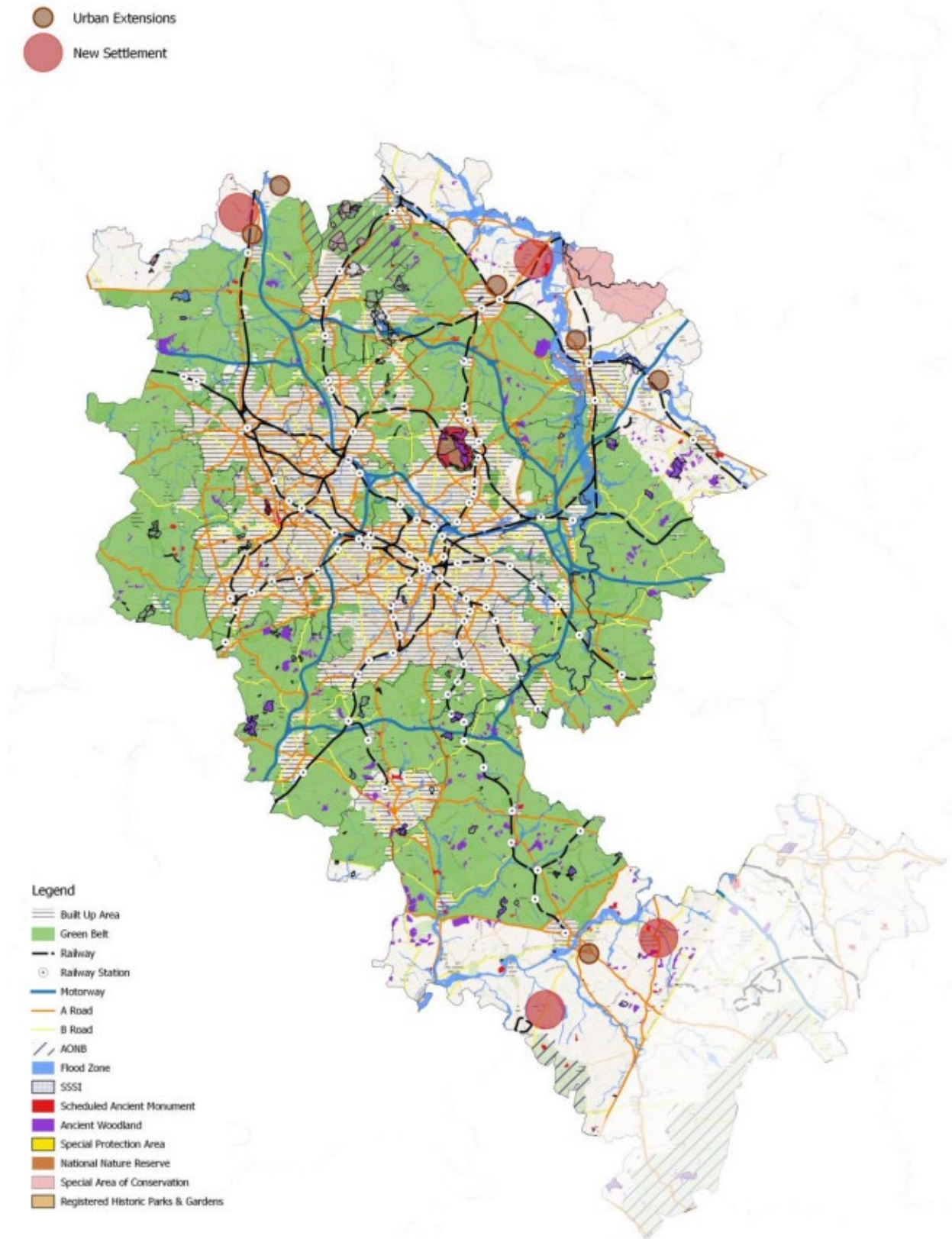


Figure 2: Shortlisted locations beyond the Green Belt from the GBHMA Strategic Growth Study



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

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

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

Urban extensions

2.6 These are defined in the study as areas of search for 1,500 – 7,500 dwellings, which would provide opportunities for development of a scale which could also support small-scale employment and associated services and infrastructure, or for housing to be co-located with an existing strategic employment area⁵. The GBBCHMA Strategic Growth Study assessed the following locations for urban extensions in South Staffordshire:

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

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

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

2.8 The selection of these urban extensions recognised that these two areas were some of the strongest performing areas of search for urban extensions across the GBBCHMA. North of Penkridge performed particularly well in terms of public transport and Green Belt⁶, whilst North of Wolverhampton performed particularly well in terms of proximity to sources of housing need and sustainability⁷. Conversely, South of Stafford was deemed unlikely to meet the unmet needs of the conurbation and performed particularly poorly in terms of deliverability and public transport access⁸, whilst South of Penkridge performed less well than the option to the north of the village in terms of Green Belt⁹.

New settlements

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

⁵ Paragraphs 1.72 – 1.80 of the GBBCHMA Strategic Growth Study

⁶ Paragraph 9.90 of the GBBCHMA Strategic Growth Study

⁷ Paragraph 9.101 of the GBBCHMA Strategic Growth Study

⁸ Paragraph 9.92 of the GBBCHMA Strategic Growth Study

⁹ Paragraph 9.91 of the GBBCHMA Strategic Growth Study

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

- Around Dunston
- Between Wolverhampton and Penkridge

2.11 Having assessed the above options against the criteria set out above, the study did not recommend these new settlement areas of search be taken forward as recommended approaches to meeting the GBHMA housing shortfall in South Staffordshire. Dunston performed particularly poorly in terms of deliverability, public transport access and addressing housing need¹⁰. Similarly, the area of search between Wolverhampton and Penkridge performed poorly in terms of public transport and deliverability when compared to other options for new settlements recommended by the study¹¹.

Proportionate dispersal

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

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

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

¹⁰ Paragraph 9.79 of the GBHMA Strategic Growth Study

¹¹ Paragraph 9.80 of the GBHMA Strategic Growth Study

Conclusions

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

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

3. Sustainable transport access to employment centres and jobs

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

National Planning Policy Framework (NPPF) 2023

3.2 The NPPF includes a number of provisions that encourage the consideration of access to employment via sustainable transport means in plan-making. These include:

- Ensuring larger housing sites have sufficient access to services and employment opportunities within the development itself, or in larger towns to which there is good access (para 74)
- The identification and pursuit of opportunities to promote walking, cycling and public transport (para 108)
- Supporting an appropriate mix of uses across an area to minimise the number and length of journeys needed for employment, shopping, leisure and other activities (para 110)
- Ensuring appropriate opportunities to promote sustainable transport modes can be taken up when allocation sites (para 114)

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

3.3 This RTPI research paper summarises current research on the subject of delivering a spatial distribution of housing development which reduces congestion and increases economic productivity, through promoting accessibility to key services through sustainable transport modes. Specifically, it concludes that outside of brownfield locations in urban centres, the next most sustainable modes of housing development in these terms are urban extensions to major urban areas and settlements with inter-urban rail links into neighbouring urban areas¹².

Stantec – Bridging the Gap (2023) and Friends of the Earth – Planning for less car use (2019)

3.4 Recent research published by Stantec indicates that a reduction in car trips of at least 20% by 2030 is required in order to meet the surface transport element of the national net zero pathway. To overcome this issue the study recognised that shifting and switching higher volume, intermediate length journeys by car between 5km – 30km would be key, as these are the greatest contributors to carbon emissions and the most likely to be susceptible to change. This indicative level of reduction in traffic reflects similar findings from Friends of the Earth research carried out in 2019 which indicated that a 20%-60% reduction in traffic would be required by 2030, even allowing for the anticipated switch to electric vehicles over time. Similarly, this research also found that focusing development around high-quality public transport would be necessary to address this reduction, rather than promoting urban sprawl and car-based ‘garden communities’.

¹² See Figure 3.7 of [Royal Town Planning Institute \(RTPI\) Research Paper: Settlement Patterns, Urban Form and Sustainability \(May 2018\)](#)

South Staffordshire Economic Development Needs Assessment (EDNA) 2018

3.5 The EDNA 2018 identified South Staffordshire, Wolverhampton, Dudley, Walsall and Cannock as forming a single functional economic market area, within which commuting flows are largely self-contained. In addition to this, the study includes a number of key findings concerning the labour market profile of the District and the existing commuting flows and distribution of employment sites throughout the District. Key findings include:

- The strong spatial and economic links between the District and the Black Country Functional Economic Market Area (p.16)
- The District's excellent access to the rail network - Wolverhampton centre can be accessed in 8 minutes and Birmingham can be accessed in 30 minutes (p.16)
- The concentration of larger businesses in the District on the four freestanding strategic employment sites (particularly i54 South Staffordshire) with the majority of businesses in the District existing as micro, small or medium enterprises outside of these locations (p.37)
- The concentration of 42% of the District's population within senior managerial, managerial and professional jobs, with senior directors being a significant proportion of this amount (p.37)
- The increasing trend of a larger number of South Staffordshire residents travel further to work when compared to historic census data (p.38)
- That only 21% of the District's working resident population live and work in South Staffordshire, with the vast majority commuting out of the District to work (p.44)
- That sectoral employment of South Staffordshire is complemented by the Black Country and Birmingham, with South Staffordshire providing higher concentrations of manufacturing, the Black Country providing greater concentrations of wholesale, retail and transport and Birmingham providing greater concentrations of financial, professional, and public administration activities (p.45)
- The likelihood that the higher skilled population in South Staffordshire works in the larger urban centres in the surrounding area (p.46)
- The District's relationship with surrounding large/urban centres (e.g. Telford, Stafford, Dudley, Walsall, Wolverhampton and Birmingham) with which it shares a large amount of economic transactions (p.49)
- The particularly strong market linkages between South Staffordshire and a large part of the Black Country – in particular Wolverhampton but also Dudley and Walsall (p.49)
- That the north of the District adjacent to the northern edge of the Black Country conurbation and along the A449 as it runs towards Stafford provides 88.2%¹³ of the District's largest and best quality employment sites (Figure 6.2)
- That 99.6%¹⁴ of the District's available supply of developable employment land is located in close proximity to the Black Country's northern edge or along the A449 corridor running north to Stafford (Figure 6.4)

¹³ EDNA 2018 identified 232.96ha of 'best' quality employment sites as located in these areas, compared to the overall 264.19ha supply of such sites in the District as a whole

¹⁴ EDNA 2018 identified 63.46ha of 'best' quality developable land is located in these areas, compared to the overall 63.71ha supply figure of such land in the District as a whole

South Staffordshire Economic Development Needs Assessment (EDNA) 2020-2040

- 3.6 The EDNA 2022 updates the Council's employment evidence base, including re-examination of the functional links between South Staffordshire and other nearby employment centres. In summary, this finds that South Staffordshire has a very low rate of commuting self-containment, with only 21% of its residents both living and working within the district¹⁵. When considering authorities in the surrounding area, Wolverhampton has far and away the biggest commuting flow from South Staffordshire residents, with a higher proportion of South Staffordshire residents working in Wolverhampton than in South Staffordshire itself¹⁶.
- 3.7 The study goes on to define the functional economic market area of South Staffordshire as including Wolverhampton, Walsall, Dudley, Cannock and Stafford. Analysis of Middle layer Super Output Areas (MSOA) within the district shows that significant out-commuting to other areas of the FEMA include areas with rail access into wider FEMA authorities¹⁷ (i.e. Penkridge, Cheslyn Hay/Great Wyrley and Codsall/Bilbrook).

Access to employment centres via public transport

- 3.8 The ability of different parts of the District to access employment centres via rail and bus links has been evidenced by Hansen Scores provided by Staffordshire County Council. This is shown in the following mapping, which shows public transport access to employment centres within and outside of the district from different locations.

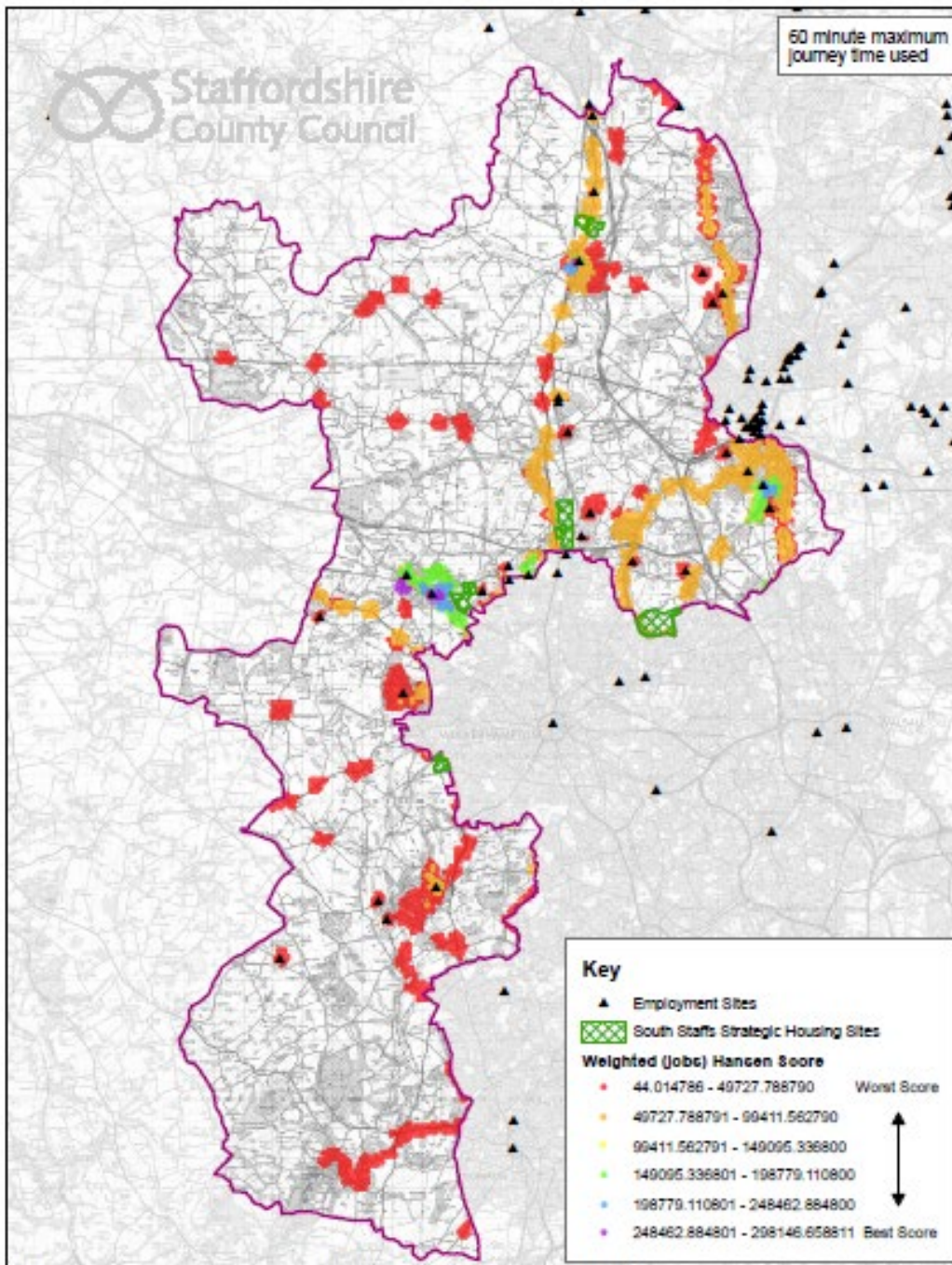
Figure 3: Public Transport Access to Employment Centres Wednesday 07:30am to 09:30am

¹⁵ Table 5 of the EDNA 2020 - 2040

¹⁶ Figure 2 and Table 9 of the EDNA 2020 - 2040

¹⁷ Table 11 of the EDNA 2020- 2040

Public Transport Access (Bus and Rail) to Employment Centres Wednesday 07:30 to 09:30 hours



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 Produced by Staffordshire County Council, 2021.



- 3.9 The weighted Hansen scores displayed above indicate the number of employment destinations that can be accessed within a 60-minute journey time, the dis-benefits of travel in terms of journey time, origin point population and the total number of jobs available at a destination.
- 3.10 The mapping demonstrates the important role that rail links play in allowing local residents to access jobs, showing that the best access to employment destinations is present in the District's larger villages with rail access (Tier 1 settlements). Outside of these villages, it also demonstrates that the areas with the second-best access to employment opportunities via

bus routes are largely located adjacent to the northern edge of the Black Country conurbation or along the A449 corridor, although the level of access to employment is lesser than is available from the train stations in Tier 1 settlements. Equally, recent research suggests that there is a pattern of continued decline in the frequency of bus services both within South Staffordshire and neighbouring authorities, with the frequency of bus services declining 57% across the district since 2010¹⁸. Therefore, areas of the district outside of Tier 1 settlements entirely reliant on bus services for sustainably accessing employment may not necessarily be able to rely on those services going forward.

Conclusions

3.11 Drawing all of the above together, it is clearly important that regard is had to the ability to access employment via sustainable transport modes when considering the future distribution of housing growth through the Local Plan review. Some summary conclusions can be drawn about the best ways in which the locations of new housing developments can be aligned to sustainable access to employment within the district:

- There is a clear requirement in national planning policy to consider the ability of new residents to sustainably access local employment opportunities. Outside of major urban centres, recent RTP1 research indicates that development in smaller settlements on rail corridors into neighbouring urban areas and urban extensions to major urban areas offer the best locations to reduce congestion and provide sustainable access to key services and employment
- In reality a relatively small proportion of South Staffordshire's resident population travel to jobs within the District for work, with the majority of residents commuting to adjacent areas instead (particularly Wolverhampton)
- The high level of out-commuting in the District is likely related to a number of factors including local sectoral profiles, proximity to neighbouring urban centres with complementary employment offers and the relative lack of large scale employers within the District outside of the existing four freestanding strategic employment sites
- Rail travel from Tier 1 settlements offers the greatest opportunities for local residents to sustainably access jobs, given the short travel times to employment centres in the Black Country (particularly Wolverhampton), the comparatively high level of jobs which can be quickly accessed from these rail stations and the high level of South Staffordshire residents that work in the Black Country (particularly Wolverhampton)

¹⁸ [How Britain's bus services have drastically declined | Policy and insight \(friendsoftheearth.uk\)](https://www.friendsoftheearth.org.uk/news/how-britains-bus-services-have-dramatically-declined)

4. Local housing need indicators

- 4.1 National planning policy requires that planning policies should be responsive to local circumstances, supporting housing developments that reflect local needs, whilst ensuring housing is located where it will enhance or maintain the vitality of rural communities¹⁹. Therefore, it is appropriate to examine local village-level indicators that could suggest where housing could address existing rural issues, particularly poor affordability for the existing community. Equally, national policy also requires needs that cannot be met within neighbouring areas are taken into account in plan-making²⁰, which is relevant for South Staffordshire given the emerging unmet housing needs of the adjacent Black Country authorities and (further afield but within the same housing market area) Birmingham.

Lower quartile affordability ratios for Tier 1 - 4 villages

- 4.2 The sections below present information on lower quartile affordability ratios (i.e. lower quartile incomes compared with lower quartile house prices) for each of the Tier 1 and 2 villages within the District as identified in the 2021 Rural Services and Facilities Audit, based on ward-level data. This level of analysis is focused on Tier 1 and 2 villages as these sizes of villages tend to be the population centres within the wards which contain them, whereas wards containing Tier 3 to 4 villages tend to contain multiple villages of similar sizes/tiers or contain other settlements of significantly larger populations than the Tier 3 and 4 villages in question.
- 4.3 The table overleaf presents the lower quartile affordability ratio for each of the District's larger villages. By way of comparison, **the most recent average lower-quartile affordability ratio for nearby West Midlands local authorities is 8.66**. Therefore, the table below can provide some indication of which settlements are performing significantly worse than the wider region.

¹⁹ NPPF paragraphs 82 and 83

²⁰ NPPF paragraph 67

Figure 6: Average ratio of Lower Quartile Incomes to Lower Quartile House Prices (April 23)	
Tier 1	
Bilbrook/Codsall	12.16
Cheslyn Hay/Great Wyrley	10.35
Penkridge	11.82
Tier 2	
Brewood	12.33
Huntington	8.54
Kinver	12.98
Perton	8.66
Wombourne	12.00
Tier 3	
Coven	12.33
Essington	10.36
Featherstone	10.31
Pattingham	10.49
Shareshill	10.31
Swindon	10.92
Wheaton Aston	10.93
Tier 4	
Bednall	12.02
Bishops Wood	10.93
Bobbington, Seisdon & Trysull	11.41
Dunston	12.02
Himley	10.92

Source: Hometrack Housing Intelligence System

- 4.4 As can be seen from the above table, all of the District's Tier 1-4 settlements are less affordable than the West Midlands average, with the exceptions of the Tier 2 settlements of Huntington and Perton.

Unmet needs from neighbouring local authorities

- 4.5 In the context of the current Local Plan review, it is important to examine where unmet needs are arising from neighbouring local authorities, as South Staffordshire sits within the Greater Birmingham Housing Market Area (GBBCHMA), which contains multiple local authorities who are unable to meet their own housing needs. Consequently, examining which neighbouring areas generate the greatest extent of unmet needs may help to highlight where new housing can be located to locate displaced households from these areas. This is because households unable to find accommodation in neighbouring areas will still have ties to the areas from which they are displaced in terms of where they work, are educated, or have family ties (for example). Therefore, locating housing to address the unmet needs of neighbouring areas in close geographical proximity to the areas from which the needs arise may help to ensure that displaced residents still have a good degree of access to places of employment, education etc. in the areas from which they originate.

- 4.6 Across the GBBCHMA there are currently a number of authorities with unmet housing needs. Currently, the adopted Birmingham Development Plan 2017 indicates that the city cannot accommodate 37,900 dwellings of its own needs, with this shortfall likely to rise significantly in the emerging review of Birmingham’s local plan. However, South Staffordshire does not adjoin Birmingham and has a limited commuting relationship with the authority (as evidenced by the fact it sits within a separate functional economic market area).
- 4.7 Perhaps more significantly, due to its proximity to South Staffordshire, is the emerging shortfall which is arising from Black Country authorities. The latest Black Country Urban Capacity Review 2021 indicates this sits somewhere within the region of 36,819 dwellings, prior to consideration of Green Belt release in the Black Country and further opportunities to increase brownfield supply on urban centres and surplus employment land²¹. According to this study, the extent of this initial shortfall can be broken down as follows across the four Black Country authorities;

Local authority	Extent of unmet need to 2039 (dwellings)
Wolverhampton	-8,698
Walsall	-8,761
Dudley	-341
Sandwell	-19,019

- 4.8 In October 2022 the progress on the Black Country Plan ceased in favour of the authorities preparing four separate Local Plans. As the individual authorities progress their Local Plans the latest housing shortfall position at the current time as set out in these individual plans is as follows:

Local Planning Authority	Latest published shortfall	Relevant document
Dudley	1,078 homes to 2041	Draft Dudley Local Plan (October 2023)
Sandwell	18,606 homes to 2041	Draft Sandwell Local Plan (November 2023)
Walsall	No published shortfall. Walsall committed to preparing a Walsall Borough Local Plan under new legislation set out in the Levelling Up and Regeneration Act 2023	
Wolverhampton	11,413 homes to 2042	Wolverhampton Local Plan Issues and Preferred Options consultation (February 2024)

- 4.9 It is clear from the above tables that shortfalls across the Black Country authorities remain significant. Sandwell does not adjoin South Staffordshire and (similar to Birmingham) has limited commuting ties with the District. However, South Staffordshire encloses the western-most extent of Dudley, the northern and western edges of Wolverhampton and part of the northern extent of Walsall. Therefore, it is important to note that of the adjacent authorities to South Staffordshire, Wolverhampton and Walsall are the two currently displaying the most significant unmet housing need which is less likely to be met through

²¹ [Independent study to support Black Country Plan suggests possible ways to build more homes on brownfield sites \(wmca.org.uk\)](https://www.wmca.org.uk)

Black Country Green Belt options or further urban centres/employment land capacity uplifts. This suggests that if unmet housing needs were located in close proximity to Wolverhampton and Walsall (i.e. along the north-western and northern edges of the Black Country) then this may minimise the extent to which households from these two areas are displaced from their existing communities, jobs and education.

Conclusions

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

- The majority of Tier 1 - 4 villages are less affordable to their local residents when compared to the average affordability ratios in the West Midlands. Exceptions to this are Huntington and Perton, which are relatively affordable compared to other settlements. Of the Tier 1 and 2 settlements, Bilbrook/Codsall, Brewood, Kinver and Wombourne perform the worst in terms of affordability. Creating additional housing supply in these locations may offer opportunities to redress these issues, particularly through the provision of affordable housing
- Of the District's neighbouring authorities, two lie within the same housing market area and have a potentially significant emerging unmet housing need (Wolverhampton and Walsall). If unmet housing needs from these areas were located in close proximity to Wolverhampton and Walsall (i.e. along the north-western and northern edges of the Black Country) then this may reduce the extent to which households from these two areas are displaced from existing communities, jobs and education in the urban area

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

Flood Risk

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

National Planning Policy Framework (NPPF)

- 5.2 The NPPF adopts a risk based and sequential approach to the management of flood risk, and states that:
- Inappropriate development in areas of flooding should be avoided (Para 165)
 - Strategic policies should be informed by a strategic flood risk assessment (Para 166)
 - Plans should apply a sequential, risk-based approach to the location of development (Para 167)
 - The aim of the sequential test is to steer new development to areas with the lowest risk of flooding (Para 168)
- 5.3 It is clear that in determining the most suitable locations to site new development such decision need to be informed by an assessment of the likely risk of flooding and that sites are selected which would minimise the potential risk. Development in high-risk areas is to be avoided.

Environment Agency

- 5.4 Mapping of flooding risk produced by the Environment Agency²² indicates that the flood zones in South Staffordshire are closely defined along tributaries of the main river networks within the district i.e. River Penk, Smestow Brook and River Stour. Environment Agency flood warning areas have been identified adjacent to north-west Penkridge, limited areas on the western fringes of Coven and small areas to the east and south-east of Kinver and to the west of the conurbation around Hinksford. This is a factor which has been taken into account during the selection process when considering the sites identified within the Strategic Housing Land Availability Assessment (SHLAA).

Staffordshire Local Flood Risk Management Strategy (2015)

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

²² <https://environment.data.gov.uk/DefraDataDownload/?mapService=EA/FloodWarningAreas&Mode=spatial>

Southern Staffordshire Surface Water Management Plan Phase 1 (2010)

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

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

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

Agricultural Land Quality

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

National Planning Policy Framework

- 5.10 The NPPF defines the best and most versatile agricultural land as land which is within grades 1,2 and 3a. At Footnote 62 the framework states "where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality should be preferred to those of higher quality".

Natural England Technical Information Note TIN 049 – Agricultural Land Classification²³

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

²³ <http://publications.naturalengland.org.uk/publication/35012>

Agricultural Land Classification Map – West Midlands Region (Natural England)²⁴

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

Open Space and Green Infrastructure

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

National Planning Policy Framework

- 5.14 The NPPF highlights the positive benefits that can be derived from improving the quantity and quality of areas of open space. The NPPF states that:
- Access to a network of high-quality open spaces and opportunities for sport and physical activity...Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (Para 102).
 - Existing open space, sports and recreational buildings and land, including playing fields, should not be built on (Para 103)
 - Planning policies and decisions should protect and enhance public rights of way and access (Para 104)
 - Take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure (para 181)

South Staffordshire Open Space Strategy 2014-2028

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

Landscape

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

²⁴ <http://publications.naturalengland.org.uk/publication/130044?category=5954148537204736>

landscape. The planting associated with the many historic parklands and gardens is acknowledged as an important feature.

National Planning Policy Framework

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

- Protecting and enhancing valued landscapes; recognising the intrinsic character and beauty of the countryside (Para 180)
- Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues...The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major development other than in exceptional circumstance (Para 182)
- Substantial harm to a designated heritage asset should be refused (Para 207)

National Character Areas

5.18 National Character Areas²⁵ are defined by Natural England and comprises 159 major landscape areas integrating a wide range of environmental information exploring the characteristic landscape, wildlife, cultural and geological features. Each area is based on landscape considerations rather than administrative boundaries. South Staffordshire is divided into three different character areas:

Staffordshire Plain

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

Cannock Chase and Cank Wood

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

Mid Severn Sandstone Plateau

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

²⁵ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making/national-character-area-profiles#ncas-in-west-midlands>

Historic Landscape Areas

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

Natural Environment

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

National Planning Policy Framework

- 5.21 The NPPF identifies the following measures in relation to the natural environment:
- Protecting and enhancing ...sites of biodiversity (in a manner commensurate with their statutory status or identified quality in the development plan) (Para 180)
 - Minimising impacts on and providing net gains for biodiversity (Para 180)
 - Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework (Para 181)
 - Take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure (Para 181)
 - To protect and enhance biodiversity and geodiversity, plans should identify map and safeguard components of local wildlife rich habitats and wider ecological networks (Para 185)
 - Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species (Para 185)

Biodiversity Action Plan

- 5.22 Biodiversity Action Plans (BAP)²⁶ are strategies to promote the conservation of biological diversity and the sustainable use of biological resources. Local action plans have been produced to co-ordinate conservation efforts in delivering in UK BAP targets at a more local level. There are four action plans which cover the district:

Central Farmland

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

Cannock Chase Heaths

²⁶ <http://sbap.org.uk/actionplan/index.php>

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

Southern Parklands

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

Southern Heaths

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

Local Nature Reserves

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

Historic Environment and Heritage

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

National Planning Policy Framework

- 5.25 The NPPF identifies the following requirements in relation to the historic environment;
- Heritage assets...should be conserved in a manner appropriate to their significance (Para 195)
 - Plans should set out a positive strategy for the conservation and enjoyment of the historic environment (Para 196)

- Local planning authorities should identify and assess the particular significance of any heritage assets that may be affected by a proposal...They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage assets conservation and any aspect of the proposal (Para 201)
- When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (Para 205)
- Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss (Para 207)

Historic Environment Character Assessment (2011)

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

with the iron workings along the River Stour which had their origins in the 17th century. The Stour Valley is also the location of the Staffordshire and Worcestershire canal which is a designated conservation area.

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

Codsall

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

Featherstone

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

Pattingham

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

Wombourne

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

Wheaton Aston

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

Urban Extension -North of Black Country

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

Urban Extension – West of Black Country

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

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

Urban Extension – East of Cannock

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

Urban Extension – South of Stafford

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

Conclusions

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

Flooding

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

Agricultural Land Quality

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

Open Space and Green Infrastructure

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

Landscape

- Restrictions associated with the Area of Outstanding Natural Beauty will impact on any development proposals along the north-eastern fringe areas of the district. This will most significantly impact on the Tier 2 settlement of Huntington and any proposals for a sustainable urban extension to the west of Cannock
- Consideration on potential impacts upon identified Historic Landscape Areas (HLA) will be required, notably the five parks and gardens which have been nationally registered

Proposals for a sustainable urban extension north of the Black Country will need to take account of the Hilton HLA. Proposals for a sustainable urban extension to the west of the conurbation will need to take account of Wergs HLA, Himley Grade II listed park and garden and Prestwood HLA

Natural Environment

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

Historic Environment and Heritage

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

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

6.1 To ensure the Sustainability Appraisal (SA) process informed the Local Plan Review from the earliest possible stage, the SA published alongside the 2018 Issues and Options considered six high level spatial options (scoping options) recognising that understanding views on longer term pattern of development at an early stage of plan development was critical. Following the Issues and Options consultation it became evident that it was unlikely that the Council would be able to meet its housing requirements by using only one of these spatial options in isolation. It was likely that the spatial distribution for development would likely involve elements of some or all the scoping options consulted on. These scoping options therefore effectively evolved into the more detailed spatial strategy option (A-I) considered in this paper that have also subsequently considered through the SA process. Therefore, as the scoping options were the first iteration of broad spatial options considered through the plan and subject to SA, it is appropriate that the results of the SA of these have helped refine and shape the more detailed spatial options in this paper. The high-level approaches to the spatial distribution of residential development considered through the Issues and Options and accompanying SA are set out below:

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

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

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

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

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

6.3 A fuller explanation of the scoring of each option and the criteria which informed it is provided in the Sustainability Appraisal itself. In summary, there are a number of common factors between all options which seek to allocate new land (i.e. Options A-E), rather than simply intensifying existing development boundaries (i.e. Option F). In particular, Options A-E all necessarily involve minor negative effects in terms of biodiversity and geodiversity, landscape and townscape and pollution and waste, whilst causing major positive effects to natural resources (due to the inevitable and irreversible loss of agriculturally and ecologically valuable soils that results from allocating greenfield land). This is the same across all options and therefore does not help to differentiate between the sustainability of different approaches when considering future directions for growth allocations. Options A-E would all result in major positive impacts in terms of housing, by providing options to meet the District’s housing needs.

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

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

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

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

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

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

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

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

Small-scale urban extensions on the fringe of neighbouring urban areas
<p><i>Major positive effects not held by all options:</i></p> <ul style="list-style-type: none"> • Transport and Accessibility

<ul style="list-style-type: none"> • Health and wellbeing
<p><i>Minor positive effects not held by all options:</i></p> <ul style="list-style-type: none"> • Climate change mitigation • Climate change adaptation • Cultural heritage • Education • Economy and employment

6.9 The additional major positive effects generated by this option reflect the better access to public transport links adjacent to neighbouring urban areas, although rail access is more sparse in the south of the District (transport and accessibility), and also the greater prevalence of health and leisure facilities in adjacent urban areas (health and wellbeing). A number of minor positive effects are also generated by this approach. **Unlike other options, this approach had no additional minor negative effects and had a number of minor and major positive effects.**

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

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

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

options, larger scale urban extensions had the joint largest number of major positive effects and have relatively few minor negative effects.

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

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

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

Conclusions

- 6.12 The Sustainability Appraisal demonstrates a number of points about the sustainability outcomes of different approaches to accommodating future housing growth in the District:

- In terms of accommodating growth in the District’s rural villages, more major positive effects and less minor negative effects result from focusing growth on the District’s Tier 1 and 2 villages (i.e. the larger and better connected settlements). A larger number of negative minor effects resulted from spreading growth across Tier 1-4 villages
- Outside of the villages, larger-scale urban extensions provided the highest number of major positive effects, whilst smaller-scale urban extensions provided the least number of negative effects whilst still providing major positive transport and health and wellbeing

effects.

- New settlements have largely the same sustainability credentials as larger-scale urban extensions, although there are additional minor negative effects in terms of climate change mitigation