



**South Staffordshire Council**

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**Local Plan Review**

# **Publication Plan**

## **Housing Density**

### **Topic Paper**

**April 2024**

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## **1. Introduction**

- 1.1 Increasingly, national policy and unmet housing needs in the district and surrounding housing market area are driving the need for more housing land to be released in the District, so that the housing required to meet local and regional needs can be provided. This means it is increasingly important to consider policies which optimise the amount of housing that can be delivered on sites within the district, in a manner which is appropriate to the local circumstances of housing sites in South Staffordshire.
- 1.2 To develop an approach to density in the Local Plan review, a number of key elements of national planning policy, regional and local evidence base documents and best practice guidance have been considered. Key findings from each of these sources are summarised and are then used to inform a proposed density policy (Policy HC2) for the Local Plan review, which is set out in draft in Section 7 of this paper.
- 1.3 The Council's policy approach to housing density standards was originally consulted on at the previous Local Plan consultation stage in 2022. Numerous respondents suggested amendments to the policy to address a number of potential issues. These included striking a better balance between density and character, making the policy approach more flexible to account for market needs, addressing biodiversity and green infrastructure requirements and the need for higher densities to make more efficient use of land. This topic paper and the updated housing density policy has been updated to reflect issues raised, with a fuller summary of points raised through the consultation and the Council's response being given in Appendix 3 of this document.

## 2. National policy and guidance

### National Planning Policy Framework (NPPF) December 2023

- 2.1 Paragraph 128 requires decisions and policies to make efficient use of land, taking into account:
- the identified need for different type of housing and other forms of development, and the availability of land suitable for accommodating it;
  - local market conditions and viability
  - the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable transport modes that limit future car use
  - the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change: and
  - the importance of securing well-designed, attractive and healthy places.
- 2.2 Paragraph 125 requires areas with an existing or anticipated shortage of land to meeting identified housing needs to avoid building homes at low densities and to ensure development optimises the potential of each site. As part of this, plans should include minimum density standards for city and town centres and other locations well served by public transport. They should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate. Minimum density standards should also be considered for other parts of the plan area. It may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range.
- 2.3 Paragraph 146 covers Green Belt exceptional circumstances and makes clear that any strategy releasing Green Belt should optimise densities in a manner consistent with Section 11 of the NPPF.
- 2.4 South Staffordshire does not have any town or city centres due to the predominantly rural character of the area and the dispersed settlement pattern of villages within the District. However, factors such as public transport accessibility, landscape sensitivity and conservation area coverage vary significantly across the District’s settlements, indicating factors which may influence where and to what extent it is appropriate to consider minimum density standards.

### Planning Practice Guidance (PPG)

- 2.5 Planning Practice Guidance on making effective use of land indicates that a range of tools may assist in establishing appropriate densities on a site or in a particular area,

including accessibility to key facilities, characterisation studies and design strategies, environmental and infrastructure capacity assessments and market or site viability<sup>1</sup>. In addition to this, the Government's National Design Guide (which supports the advice in Planning Practice Guidance) indicates that "*well designed places do not need to copy their surroundings in every way. It is appropriate to ... include innovation or change such as increased densities, and to incorporate new sustainable features or systems*".

**Key facts**

- There is a general requirement in the NPPF and PPG to make effective use of land, having regard to access to key services and facilities, an area's character, environmental infrastructure and capacity and viability
- Government design guidance indicates that well designed places do not need to copy their surroundings in every way, and that it is appropriate to plan for increased densities
- The NPPF highlights the need to consider minimum density policies in areas where there is a housing shortfall in order to achieve a "*significant uplift*" in housing densities, particularly (but not only) in areas well served by public transport

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<sup>1</sup> Planning Practice Guidance: 'Effective Use of Land' paragraph 004

### 3. Regional and national guidance on residential densities

- 3.1 In order to reduce the extent of Green Belt and countryside release required to meet the substantial housing shortfalls of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA), the GBBCHMA Strategic Growth Study 2018 concluded that it would be reasonable to apply a minimum density of 35 dwellings per hectare to land supply in the GBBCHMA authorities surrounding the urban conurbation, with conurbation areas (Birmingham and the Black Country) achieving a higher average figure of 40 dwellings per hectare<sup>2</sup>. The study concluded that applying these minimum densities to existing land supply could realise an additional capacity of around 13,000 dwellings across the GBBCHMA<sup>3</sup>, reducing the pressure for Green Belt land take.
- 3.2 Given the potential role density increases could play in minimising further Green Belt loss to address the housing shortfall, it is important to ensure these recommendations are fully tested. For example, the Black Country authorities' 2018 Urban Capacity Review<sup>4</sup> establishes that the (now suspended) Black Country Plan would seek an uplift in minimum densities from 35 to 40 dwellings per hectare, in order to minimise Green Belt release and to deliver the recommendations of the Greater Birmingham and Black Country HMA Strategic Growth Study 2018. Whilst the Black Country Plan is no longer being progressed the evidence base behind this plan is still relevant and requires consideration.
- 3.3 Since the publication of the Strategic Growth Study 2018, the government has produced a National Model Design Code in 2021, which the NPPF indicates should be used to refuse poorly designed development<sup>5</sup>. This indicates that suburbs (including those in rural areas) will generally range between 30 – 50 dwellings per hectare<sup>6</sup>. This is important guidance given the existing suburban built character of much of the District's larger rural settlements.

#### **Key facts**

- To reduce the need for Green Belt release within the District and the wider housing market area developments within South Staffordshire should seek to achieve a minimum density of 35 dwellings per hectare
- National Model Design Code guidance indicates that suburbs or rural areas can have a range of densities between 30-50 dwellings per hectare

<sup>2</sup> Paragraph 1.33 of the Greater Birmingham and Black Country HMA Strategic Growth Study 2018

<sup>3</sup> Table 38 of the Greater Birmingham and Black Country HMA Strategic Growth Study 2018

<sup>4</sup> Available here: <https://blackcountrycorestrategy.dudley.gov.uk/media/11522/urban-capacity-report-may2018.pdf>

<sup>5</sup> NPPF 2023 paragraph 139

<sup>6</sup> National Model Design Code Part 1, page 20

## 4. Historic assumptions regarding density in and adjacent to South Staffordshire

4.1 South Staffordshire's Strategic Housing and Economic Land Availability Assessment (SHELAA) 2018 established appropriate District-wide site assumptions in respect of site densities, based on different broad locations within the District. These were established for the purpose of assessing both existing housing site options and the minimum capacity of potential future housing site options within the District through the Local Plan review, as set out below:

- *Village edge/isolated greenfield sites*: 32 dwellings per hectare
- *Sites within existing village envelope/brownfield sites*: 38 dwellings per hectare
- *Sites on the edge of an adjacent urban area*: 35 dwellings per hectare

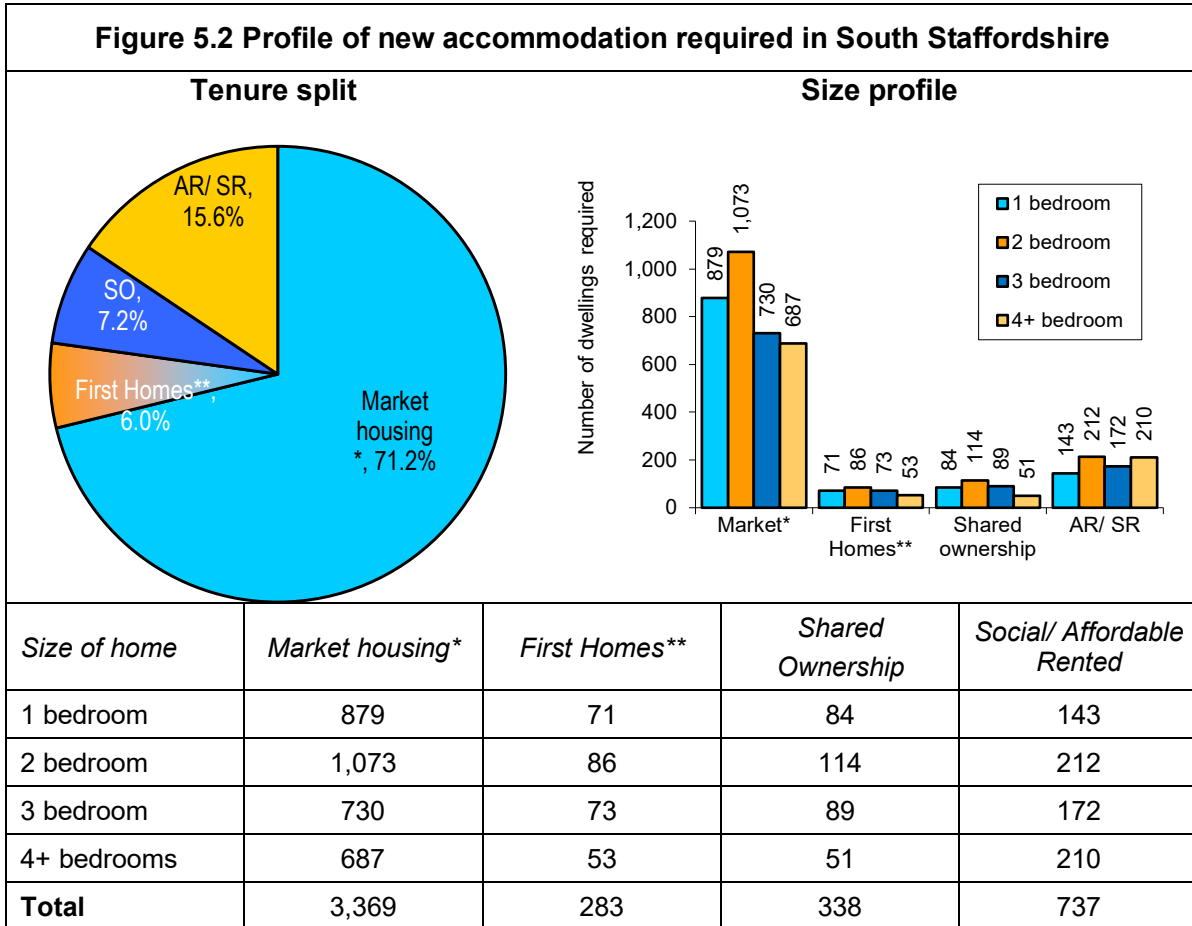
4.2 These assumptions drew on evidence of historic average densities within the District between 2007-2017 and were agreed as realistic starting points for estimating site yields with members of the District's SHELAA Housing Panel, which included local land agents, housing developers and neighbouring local authorities. Therefore, they offer some indication as to the minimum average densities achieved in the District historically. However, the data which informed these judgements dated from before the introduction of the NPPF 2019, which first introduced requirements for significant uplifts in densities to be delivered where housing shortfalls exist. Therefore it would not be appropriate to conclude that these are necessarily representative of appropriate densities going forward given the worsening housing shortfalls in the region and increased national policy imperatives to maximise use of land.

### **Key facts**

- Prior to the introduction of the NPPF 2019 and its requirement for density uplifts, average densities within the District across all main site typologies have exceeded 30 dwellings per hectare
- 32 dwellings per hectare was considered a realistic historic average estimate of site yield on village edge sites
- 38 dwellings per hectare was considered a realistic historic average estimate of site yield on sites within existing village envelope/brownfield sites

## 5. Housing mix evidence and appropriate densities to reflect this

5.1 The Council has prepared multiple updates to its housing need evidence base in the course of preparing its Local Plan review. The latest of these is the Strategic Housing Market Assessment 2024 (the SHMA), which examines the need for different types and forms of housing. This provides important evidence on the size of dwellings the Council is likely to need in future years. Key findings from the SHMA are presented below.



5.2 Key findings relevant to the density of future development are as set out below;

- The greatest needs across the District are for 2 bedroom dwellings
- A significant need for 1 and 3 bedroom dwellings also exists
- The majority of future dwellings will meet the needs of owner occupiers, but a significant proportion of rented properties are also required

5.3 These findings are consistent with the Council’s historic policies on housing mix, which reflected the need to provide more 2 and 3 bedroom properties in the District. This reflects the need to rebalance the District’s housing stock, 70% of which is currently 3 bedrooms or more, meaning that future housing densities and layouts will inevitably



need to consider higher housing densities to redress this imbalance and provide more 2 bedroom properties in particular. Furthermore, the evidence from the SHMA set out above indicates that there is also a significant need for 1 bedroom properties and private rented accommodation, indicating a need that may (in some cases) be best met through provision of flats.

- 5.4 To further examine how its housing mix policies have been delivered on the ground alongside other policies that may impact on density<sup>7</sup>, the Council has assessed recent full planning permissions/applications for housing development. Permissions and applications have been considered where these are promoted by a housing developer (as opposed to a land agent) and have been determined or prepared since the production of the Council's housing mix evidence that was initially prepared to support preparation of the Local Plan Review (the 2017 Strategic Housing Market Assessment and 2018 Housing Strategy). This ensures that these applications reflect recent evidence and policies regarding housing mix, internal and external space and green infrastructure, whilst also providing a viable product for developers. Specifically, these applications would have achieved a satisfactory mix of property sizes for both market and affordable properties (in line with the 2017 SHMA evidence), whilst delivering 10% of the overall dwelling mix as housing suited to more elderly residents<sup>8</sup> (in line with the 2018 Housing Strategy). The planning applications and permissions which meet these criteria are listed in Appendix 1.
- 5.5 The evidence given in Appendix 1 indicates that existing permitted densities on larger village-edge sites (100+ dwellings) have usually delivered densities around 35 dwellings per hectare, often exceeding this threshold. Major infill sites for housing within the villages have usually delivered schemes above 35 dwellings per hectare, especially the elderly persons' flatted scheme permitted during this time period, which achieved a density in excess of 80 dwellings per hectare. Smaller village-edge sites (10 – 99 dwellings) have delivered between 29 and 36 dwellings per hectare, with significant variety in the density of schemes across Tier 1-3 settlements.

### **Key facts**

- Since the publication of the District's housing mix evidence in 2018, larger village edge sites have delivered between 34-37 dwellings per hectare whilst meeting other local policy requirements around housing mix, parking and internal/external space
- Over a similar period smaller village edge sites have delivered a wider range of densities (between 29-36 dwellings per hectare)
- Inclusion of higher-density apartments designed to meet the District's elderly persons needs into wider scheme design is likely to increase densities further

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<sup>7</sup> For example, parking standards or space about dwellings requirements

<sup>8</sup> Meaning either bungalows, 1.5 storey dormer bungalows or ground floor flats

- The Council's housing mix evidence base supports the need to provide more homes of 1-3 bedrooms, rather than replicating the District's existing overreliance on larger properties in its dwelling stock

## 6. Public transport accessibility and opportunities for mixed-use/walkable neighbourhoods

- 6.1 Ensuring future housing growth provides for and sustains infrastructure is a key priority for the Council in its Local Plan review, emphasising the importance of new development providing more than just housing. Furthermore, as set out above, the NPPF encourages the efficient use of land, particularly where there is a high level of access to public transport and mixed-use areas. It is therefore important to examine whether areas of the District could provide opportunities to increase densities based on public transport accessibility or the need to deliver new infrastructure on sites.
- 6.2 There are a variety of public transport opportunities within South Staffordshire, with some of the District's Tier 1 settlements having significant areas of potential development land within walking distance of rail stations. Importantly, significant out-commuting also occurs from South Staffordshire towards Wolverhampton, Cannock, Stafford and Birmingham, whose centres can all be directly accessed from rail stations within Tier 1 settlements. Research suggests that people will generally be willing to travel significant distances on foot to access rail facilities, especially in the context of a commuting trip. The upper ends of these ranges are between 1,600m and 2,000m<sup>9</sup>. Accessibility mapping for the District also shows these are the locations with the best sustainable access to employment in the District<sup>10</sup>, offering a significant improvement over areas with access only to bus and/or walking routes to employment. Mapping in Appendix 4 shows that the majority of potential development land within and around Tier 1 settlements are within the lower end of these thresholds<sup>11</sup>.
- 6.3 Numerous publications draw a link between the density and catchment of surrounding residential development and the viability of nearby public transport. For example, the Urban Design Compendium suggests that around 45 dwellings per hectare should be planned around bus stops to sustain a good bus service. A similar finding is echoed in the withdrawn Better Places to Live: By Design, which recommends that 40 dwellings per hectare is planned to facilitate regular bus stops every 200-300 metres, with higher densities around the bus stops themselves. Equally, a number of documents<sup>12</sup> indicate that higher densities are likely to be most effective within walking distance of a regular bus route, which is usually indicated as being between 400-800 metres.

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<sup>9</sup> See, for example, 'How far do people walk?' – WYG (2015) and Barton, H., Grant, M. & Guise, R. (2010) 'Shaping Neighbourhoods: For local health and global sustainability', January 2010, 'Providing for Journeys on Foot' – CIHT (2000)

<sup>10</sup> See the Rural Services and Facilities Audit for more information

<sup>11</sup> Measured with as-the-crow-flies isochromes for indicative purposes only, actual accessibility needs to assess the quality and distance of on the ground footpath routes as assessed in the Housing Site Selection Topic Paper

<sup>12</sup> See, for example, 'How far do people walk?' – WYG (2015), 'Planning for Walking' – CIHT (2015) and 'Bus Services & New Residential Developments: General Highways and Urban Design advice to applicants and Highways Authorities' – Stagecoach (2015)

However, it is important to note that the overall convenience of access to bus use is important and will influence whether or not a service will be used regularly, so the attractiveness of individual stops (and therefore whether or not people will walk to them) will vary depending on individual circumstances<sup>13</sup>.

- 6.4 Both the Manual for Streets<sup>14</sup> and the Urban Design Compendium suggest certain population thresholds are required to support local shops and other centre uses. Both suggest that a critical population mass to support services is best met within a walking threshold of approximately 800m in order to deliver walkable neighbourhoods. This 800m threshold is also supported by the government's latest National Design Guide<sup>15</sup>. Although this threshold is not an upper limit on the distance people will walk to services, it still supports the principle that optimising densities within walkable neighbourhoods can help to ensure that residents are likely to walk to local facilities rather than drive, thus reducing pressure on parking and highways and supporting nearby local services.
- 6.5 Considering this principle, there are significant opportunities for locating residents within walking distance of educational and retail within the District's existing villages. Specifically, the vast majority of existing built-up areas in Tier 1, 2 and 3 settlements are within 800m of both an educational facility and a village/neighbourhood centre as identified within the Council's retail evidence base. This is shown in the mapping in Appendix 4.

### **Key facts**

- Higher densities may be appropriate where these help to deliver walkable neighbourhoods and new bus routes within new large-scale sites, reducing the degree to which residents will need to use cars for their day to day needs
- The majority of land options within and around Tier 1 settlements are within 1,600m walk of a rail station, suggesting increased densities here could help to maximise the number of residents with access to these key public transport facilities
- The majority of existing built-up areas in Tier 1, 2 and 3 villages are within 800m walk of both an educational facility and a village/neighbourhood centre, suggesting infill developments within these locations may help to deliver (partially) walkable neighbourhoods

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<sup>13</sup> 'How far do people walk?' – WYG (2015)

<sup>14</sup> [Manual for the Streets \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

<sup>15</sup> [National design guide.pdf \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

## 7. Local character

- 7.1 National policy requires Councils to have regard to an area's character when considering how to best make efficient use of land. Key guidance on the design of new development for both the District as a whole and in specific settlements can be found in the South Staffordshire Design Guide and relevant Conservation Area Appraisals. Recognising that the majority of options for future housing growth in the District are in greenfield settlement-edge locations, it is also important to consider areas of higher landscape sensitivity to housing development, as set out in the Landscape Sensitivity Assessment. A summary of relevant findings from each of the above evidence base documents for all Tier 1-3 settlements is set out in Appendix 2.
- 7.2 The South Staffordshire Design Guide provides broad district-wide guidance on density for new housing schemes, based upon the context of the District and a review of urban design best practice. This concluded that higher densities would generally be more appropriate within local and village centres. It also highlighted the potential for development towards the edge of a settlement to use lower densities to allow for a smoother transition between built up areas and the natural landscape. However, the Design Guide also indicated that there should be a variety of densities within all larger schemes of over half a hectare, providing a higher density of development along principal routes, around crossroads or community centres or public spaces and lower densities along tertiary or minor routes.
- 7.3 The Design Guide also offers settlement specific design guidance, which in some cases relates to the density and scale of development appropriate in each of the District's villages. Whilst specific guidance varies from settlement to settlement there are some common themes that apply across most areas. Guidance typically advocates for higher densities/more efficient use of land around settlement centres, whilst specifying in many settlements that new development should generally maintain a low-lying form of between 2-3 storeys.
- 7.4 There are also significant differences in landscape sensitivity to residential development on the edges of different settlements throughout the District<sup>16</sup>, indicating locations which could accommodate higher density 2-3 storey development with less impacts on the surrounding landscape. These factors and other relevant local evidence may assist in identifying areas where it may be more or less appropriate to set minimum density standards in line with NPPF guidance, especially as the vast majority of potential development sites in the District are greenfield sites on the edge of existing rural settlements.

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<sup>16</sup> See Landscape Sensitivity Assessment

- 7.5 The map shown in Appendix 4 indicates where higher areas of landscape sensitivity (as defined in the 2019 Landscape Sensitivity Assessment) overlap with potential development sites suggested to the Council in the SHELAA. As a general rule of thumb, settlements where most/all potential development options sit within areas of higher landscape sensitivity are Tier 2 and 3 settlements, specifically Kinver, Brewood, Wheaton Aston and Huntington. In contrast, Tier 1 settlements typically have large proportions of settlement-edge site options which sit outside of these areas of higher sensitivity.
- 7.6 The District also contains a variety of Conservation Areas, which could impact upon the layout and density of schemes in such areas. Conservation Areas are often centred around the historic core of rural settlements rather than the rural periphery of each settlement where the majority of housing growth is likely to be focused. The Conservation Area Appraisals prepared for each of these provide guidance for how to manage the built environment to conserve and enhance the designated area. However, no guidance on densities is specified within these documents, beyond indicating that development in and around the relevant areas should respect their character in terms of density and scale. Similarly, Extensive Urban Surveys have been prepared for the District's historic medieval towns (Penkridge, Kinver and Brewood). As summarised in the Appendix 2 none of the recommendations from this work specify higher or lower densities will be more or less appropriate in the historic character areas identified.

### ***Key facts***

- The District's Design Guide supports the need to increase densities around settlement centres, whilst limiting built form to 2-3 storeys in scale in most rural settlements
- The District Design Guide indicates all larger sites (over half a hectare) should provide a variety of densities, providing a higher density of development along principal routes, around crossroads or community centres or public spaces and lower densities along tertiary or minor routes
- Some Tier 2 and 3 settlements are entirely surrounded by areas of higher landscape sensitivity, indicating areas where village edge development may have to more sensitively respond to the landscape setting in terms of built form
- Guidance relevant to the District's Conservation Areas, which are largely focused on central locations within villages, indicates that development in and around such areas should respect their character in terms of density and scale

## 8. Conclusions on density evidence and recommendations

- 8.1 There are clear requirements in both national policy and guidance to make more efficient use of land for housing, including considering minimum density policies where appropriate. However, currently there are a significant number of major housing schemes permitted at or below the bottom end of the density range indicated for such schemes in national design guidance and below the density standard recommended in regional evidence to address acute housing shortfalls. This is despite some schemes in the District clearly showing that appropriate tenure mix and layout can be achieved at higher densities within suburban housing layouts that conform to the District's existing Design Guidance.
- 8.2 Given this context, the following areas are proposed for a minimum housing density to ensure that new development makes efficient use of land in areas with better access to public transport and services and facilities, whilst balancing the need for increased densities in certain areas against the need to respect the existing character and built form.

### **Major development on village-edge sites adjacent to Tier 1 settlements**

- 8.3 The District's design guidance and character work do place limits on the extent of density uplifts that can be achieved within the District, especially in settlement edge locations. Whilst settlements entirely surrounded by more sensitive landscapes tend to be in lower order settlements (i.e. Tier 2 and below), maintaining and enhancing the District's rural settlements' character still requires a 2-3 storey built form to be maintained in most instances. However, despite this restriction national design guidance indicates that suburban housing schemes of this type can still typically achieve a density range of 30-50 dwellings per hectare and the District's Design Guide also requires major developments to deliver a variety of densities. This suggests there may be potential for such schemes to more efficiently use land without necessarily having to introduce forms of housing that may be out of character with the District's rural settlements.
- 8.4 Major housing developments in the District have typically been suburban housing schemes in village edge locations with built form limited to 2-3 storeys, in line with the District's Design Guide. Many of these schemes have achieved a net density of 35 dwellings per hectare or greater whilst complying with other local policy requirements, especially on larger scale schemes. However, there are also some smaller village edge schemes which achieve lower densities of around 30 dwellings per hectare or under, despite some of these schemes sitting adjacent to Tier 1 settlements within walking distance of high-quality public transport links into the surrounding urban areas. Aside from apartment-led schemes, no major permitted housing schemes

have achieved a density of 40 dwellings per hectare or greater within the current policy framework.

- 8.5 Without policy intervention the District is therefore only partially achieving the target set out in regional evidence for a minimum density of 35 dwellings per hectare in rural authorities. This is despite the evidence summarised above that 35 dwellings per hectare can demonstrably be achieved without undermining wider general policy requirements around housing mix and layout whilst keeping to a type of built form that is consistent with character guidance in the District's Design Guide.
- 8.6 To address this issue a minimum density of 35 dwellings per net developable hectare will be required in land adjacent to Tier 1 settlements. This reflects the major role such sites will likely have in delivering the Council's spatial strategy and the better access they have to key public transport links compared to other village edge locations elsewhere in the District. Whilst evidence of consented schemes suggests such densities can be consistent with the District's existing Design Guidance, flexibility will also need to be offered in cases where significant adverse impacts to the surrounding area's historic environment, settlement pattern or landscape character.

**Major development on land within the existing built-up areas of Tier 1-3 settlements or around new neighbourhood or local centres**

- 8.7 The District's design guidance specifically indicates that densities should be increased within settlement cores to enhance and support these centres, although there is still a need to balance this with the existing scale and character of Conservation Areas that overlap with some centre. There is also clear evidence to suggest that more walkable neighbourhoods are possible by focusing development within the existing built-up areas of the District's Tier 1-3 settlements, based upon the proximity of such locations to education facilities and village/neighbourhood centres. Major housing schemes within existing built-up areas within villages have also achieved higher densities than most village edge schemes historically.
- 8.8 Where new large-scale sites are delivering mixed-use centres there is also significant evidence to suggest that higher densities may be appropriate in order to support new services and facilities, such as local retail centres and bus routes. Higher densities in these locations also help to facilitate more walkable neighbourhoods by locating more residents within close proximity to key facilities.
- 8.9 Recognising these factors, a minimum density of 35 dwellings per net developable hectare will be required for major housing development within the built-up areas of Tier 1 – 3 settlements. Flexibility on this standard will be possible where development would otherwise result in demonstrable adverse impacts to the surrounding area's historic environment, settlement pattern or landscape character. This will allow the



flexibility for important heritage assets (such as Conservation Areas) to justify a departure from these minimum densities where necessary. Where it would help to support the delivery of local services and facilities, sites will also be encouraged to increase densities further where this could be done in a manner consistent with other Local Plan policies, particularly those relevant to the character of the surrounding area.

**Sites in other locations identified for housing growth, including minor development**

- 8.10 In locations not covered by the minimum density standards set above (e.g. village-edge sites adjacent to Tier 2 and 3 settlements) policy will make clear that the appropriate density of a scheme will be determined on a case-by-case basis. In doing so it will have regard to the location of the site relative to services and facilities and other development plan policies, such as those addressing local design, character and housing mix requirements. This allows flexibility for densities to be increased in certain locations if site-specific circumstances allow, whilst recognising the need for this to be balanced against landscape sensitivities in smaller rural villages and generally poorer access to services and public transport in locations outside of Tier 1 settlement expansion and infill development within Tier 1-3 settlements.

**Recommended policy wording**

- 8.11 To deliver the approach to residential density set out above, the Council will use the following housing density policy in the Local Plan review. In applying this policy, net developable area will be defined as the site area occupied by dwellinghouses and associated private amenity space, car parking area and internal access roads (including any street trees or incidental green infrastructure along these). Non-residential land uses such as public open space, semi-natural spaces used for biodiversity, landscape buffers, sustainable drainage systems and community facilities will not be included in the net developable area.

**Policy HC2: Housing Density**

Housing developments will achieve a minimum net density of 35 dwellings per net developable hectare in developments within or adjoining Tier 1 settlements and in infill locations within the built-up area of Tier 1-3 settlements across the district. In achieving this standard across a development as a whole, densities of different areas within a scheme may vary where justified by local character impacts and provision of services and facilities.

The net density on a site may go below the minimum density standard set above if to do otherwise would demonstrably result in adverse impacts to the surrounding area's historic environment, settlement pattern or landscape character or would prevent the delivery of other Local Plan policy requirements.

In central areas where it would help to support the delivery of new local services and facilities, sites will be encouraged to exceed this minimum density standard where this could be done in a manner consistent with other development plan policies, particularly those relevant to the character of the surrounding area.

In areas not covered by the minimum density standards set out above, the appropriate density of a scheme will be determined on a case-by-case basis. In doing so it will have regard to the location of the site relative to services and facilities and other development plan policies, such as those addressing local design, character and housing mix requirements. All housing developments should seek to make efficient use of land, whilst ensuring they still meet the requirements of other Local Plan policies.

Development proposals should be consistent with other Local Plan policies.

## Appendix 1 – Summary of densities per net developable hectare on recently permitted housing schemes

<b>Major housing schemes for full/reserved matters permission since the housing mix evidence base was updated post Core Strategy adoption (SHMA 2017) and the Housing Strategy was adopted (March 2018)</b>				
<b>Site type</b>	<b>Planning reference no.</b>	<b>Dwellings</b>	<b>Developable area (ha)</b>	<b>Dwellings per developable hectare</b>
<b>LARGE VILLAGE EDGE SUBURBAN</b>				
Land off Pendeford Mill Lane, Bilbrook	18/00710/FUL	164	4.38	37
Hobnock Road, Essington	18/00450/REM	230	6.29	37
Land north of Bridgnorth Road, Wombourne	18/00802/FUL	102	2.76	37
Land north Penkridge	19/00862/REM	200	5.88	34
<b>SMALLER VILLAGE EDGE SUBURBAN (Tier 1 settlements)</b>				
Saredon Road, Cheslyn Hay	19/00407/FUL	60	1.72	35
Land north-west of Stafford Road, Penkridge	21/00977/REM	24	0.83	29
Land at Keepers Lane, Codsall	21/00068/REM	65	1.81	36
Land at Landywood Lane, Great Wyrley	21/00631/FUL	50	1.62	31
<b>SMALLER VILLAGE EDGE SUBURBAN (Tier 2 settlements)</b>				
Ivetsey Road, Wheaton Aston	20/00748/FUL	32	1.06	30
Hyde Lane, Kinver	19/00444/REM	45	1.34	34
Beggars Bush Ln, Wombourne	19/00212/REM	90	2.89	31
Land off Engleton Lane, Brewood	18/00991/FUL	73	2.26	32
Land west School Lane, Coven	18/00558/FUL	63	1.8	35
<b>VILLAGE INFILL SITES (housing)</b>				
Land off Histons Hill, Codsall	18/00544/FUL	29	0.79	37
Land off Ounsdale Road, Wombourne	18/00831/FUL	32	0.84	38
Bridge Farm, Wheaton Aston	21/00660/FUL	21	0.57	37
<b>VILLAGE INFILL SITES (apartments)</b>				
The Burgesses, Kinver	18/00332/FUL	20	0.24	83

## Appendix 2 – Design and landscape guidance (Tier 1-3 settlements)

Settlement	Landscape Sensitivity on village edge (Landscape Sensitivity Assessment 2019)	South Staffs Design Guide 2018 – key guidance on density	Conservation Area Appraisal guidance relating to density	Staffordshire Extensive Urban Survey 2013
<i>Codsall/ Bilbrook</i>	Moderate (Bilbrook), Moderate-high/high (Codsall)	Strengthen character through facilitating diversity of building types whilst respecting existing low-rise fabric  Codsall – Increase density of development within village centres	Requires new development in and around the area to respect Codsall’s character in density and scale.	n/a
<i>Penkridge</i>	Moderate/ moderate-high	Pattern-book design forms should be avoided by respecting the proportions and low-rise scale of the existing built fabric	None	No relevant recommendations
<i>Chelsyn Hay/ Great Wyrley</i>	Moderate/low-moderate	Cheslyn Hay – development in village core should make efficient use of land  Great Wyrley - neighbourhood areas should create housing development to make efficient use of land, and should be of a greater density in the core areas.	n/a	n/a
<i>Wombourne</i>	Low-moderate/ moderate/ moderate-high	The existing two and three story scale should be maintained	None	n/a

<i>Brewood</i>	Moderate-high/ <b>high</b>	Expectation that development scale will rarely exceed two and a half storeys outside Market Place in the village core.	Requires new development in and around Brewood village to respect its character in terms of density and scale	No relevant recommendations
<i>Perton</i>	Moderate/ moderate-high	None	n/a	n/a
<i>Huntington</i>	Moderate-high/ <b>high</b>	Within the village core development should encourage housing development at a medium to high density to make more efficient use of land and strengthen the cohesion of the residential neighbourhoods	n/a	n/a
<i>Kinver</i>	Moderate-high/ <b>high</b>	Retain compact density, nature and domestic scale of settlement's core. Peripheral development should be designed in a compact form, low density suburban housing should be avoided.	None	No relevant recommendations
<i>Essington</i>	Low-moderate	Retain compact density, nature and domestic scale of settlement's core. Peripheral development should be designed in a compact form.	n/a	n/a
<i>Coven</i>	Moderate	New buildings should directly reflect the ridge height, roof span and eaves depth of surrounding properties, with an expectation that the scale will rarely exceed two and a half storeys.	n/a	n/a
<i>Featherstone</i>	Low-moderate/moderate	Development within the village core should encourage housing development to make more efficient use of land whilst recognising the local character	n/a	n/a
<i>Swindon</i>	Low-moderate	Retain an appropriate low-rise scale,	n/a	n/a

		while avoiding uniformity, or repetitive detached house types.		
<i>Shareshill</i>	Moderate/ moderate-high	New development within the village core should create a relatively dense pattern to strengthen village character	n/a	n/a
<i>Pattingham</i>	<b>High/</b> moderate	Retain compact character and domestic scale in the settlement’s core. Peripheral development should be designed to reflect filtering of density towards the village edge.	Requires new development in and around the village to respect the character of Pattingham in terms of density and scale	n/a
<i>Wheaton Aston</i>	Moderate-high/ moderate	Any new development within the village core should adopt a compact density, directly connected to the existing street structure to strengthen the historic character and settlement pattern	Requires new development in and around the village to respect the character of Wheaton Aston in terms of density and scale	n/a

### Appendix 3 – Summary of objections received to the previous local plan consultation with Council response

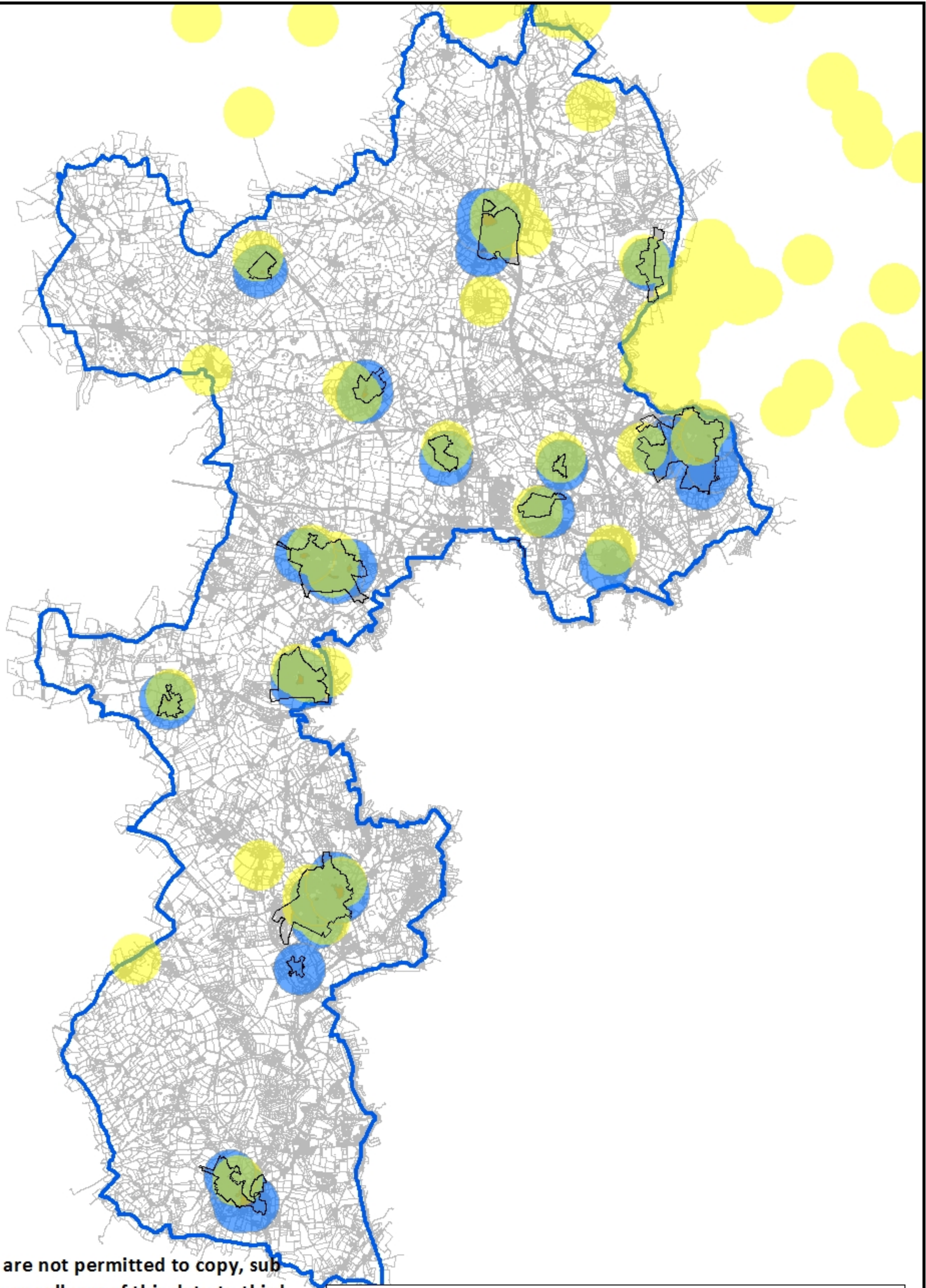
Summary of key comments	Alterations made to draft policy (or justifications for not doing so)
The policy would permit 'adverse impacts' on historic character, landscape or settlement pattern	Changed policy to make clear that adverse impacts on these factors will warrant deviation from the density policy where these can be demonstrably shown by applicants.
Capacities assumed in proposed allocations should be increased	The topic paper has given greater consideration to design guidance and has updated information on historic densities achieved on major schemes within the District. These suggest that further increases in minimum densities beyond the 35 dwellings per hectare may risk forcing the Council to approve schemes not consistent with design guidance (2/3 storey dwelling form) and which is not consistent with other policies that have led to higher densities being around 38 dwellings per hectare.
A more nuanced approach should be taken which reflects market requirements for housing types, including executive type housing	The densities of historic schemes show that deliverable schemes which include a range of housing types and sizes (including larger properties) can achieve the minimum 35 dwellings per hectare standard.
A range of densities should be provided for different areas, not a single figure	The 35 dwellings per hectare figure is explicitly just a minimum density for limited areas within the District where making efficient use of land is especially important due to access to public transport and other facilities. It does not specify a maximum density and already allows for applicants to deviate from it where this can be justified. No change is required.
Greater flexibility is needed to reflect open space provision, biodiversity net gain, cycle and bin storage, accessible and adaptable dwellings, energy efficiency, space standards, parking provision etc.	The density figure is for the net developable area of a site, excluding areas given over to other land uses (e.g. semi-natural greenspace, SuDS etc). Other policies with significant effects on layout, such as car parking and internal and external space standards, have generally remained the same or been made more flexible in new local plan review policies. Schemes already achieving consistency with these standards have delivered 35 dwellings per hectare as shown in the Council's historic monitoring.
Historic environment and settlement character may require developments	Schemes already achieving consistency with space about dwellings standards have delivered

<p>to go below the standards proposed, particularly given the policy measures proposed in HC8 and HC12</p>	<p>35 dwellings per hectare as shown in the Council’s historic monitoring. The policy already includes flexibility to deviate under specified circumstances relating to historic environment and settlement character.</p>
<p>The policy is too prescriptive and will lead to bland developments</p>	<p>The policy ensures sufficient flexibility in meeting the density standards where justified and does not restrict interesting layout and design.</p>
<p>The 35 dwellings per hectare standard will fail to deliver biodiversity enhancement and climate change mitigation benefits and will exacerbate the urban heat island effect</p>	<p>The density figure is for the net developable area of a site, excluding areas given over to other land uses (e.g. semi-natural greenspace, SuDS etc).</p>
<p>Higher density development should be directed within certain character areas of larger multi-phase developments</p>	<p>The policy has been altered to clarify that higher densities may be supported in central areas where it would assist in the delivery of services and facilities.</p>



## **Appendix 4 – Accessibility and landscape sensitivity mapping**

# Areas within 800m of education and retail







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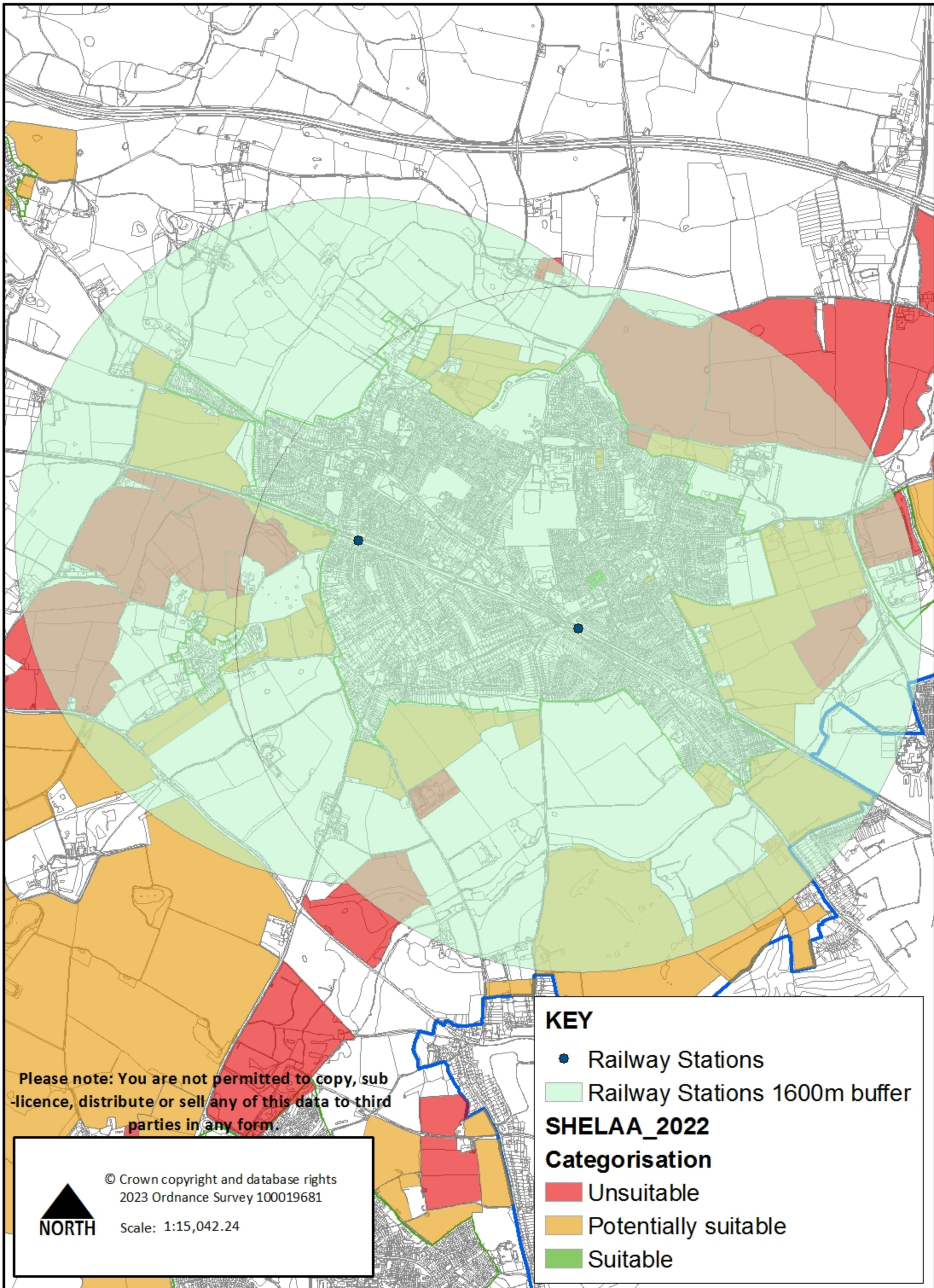
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Scale: 1:119,373.37

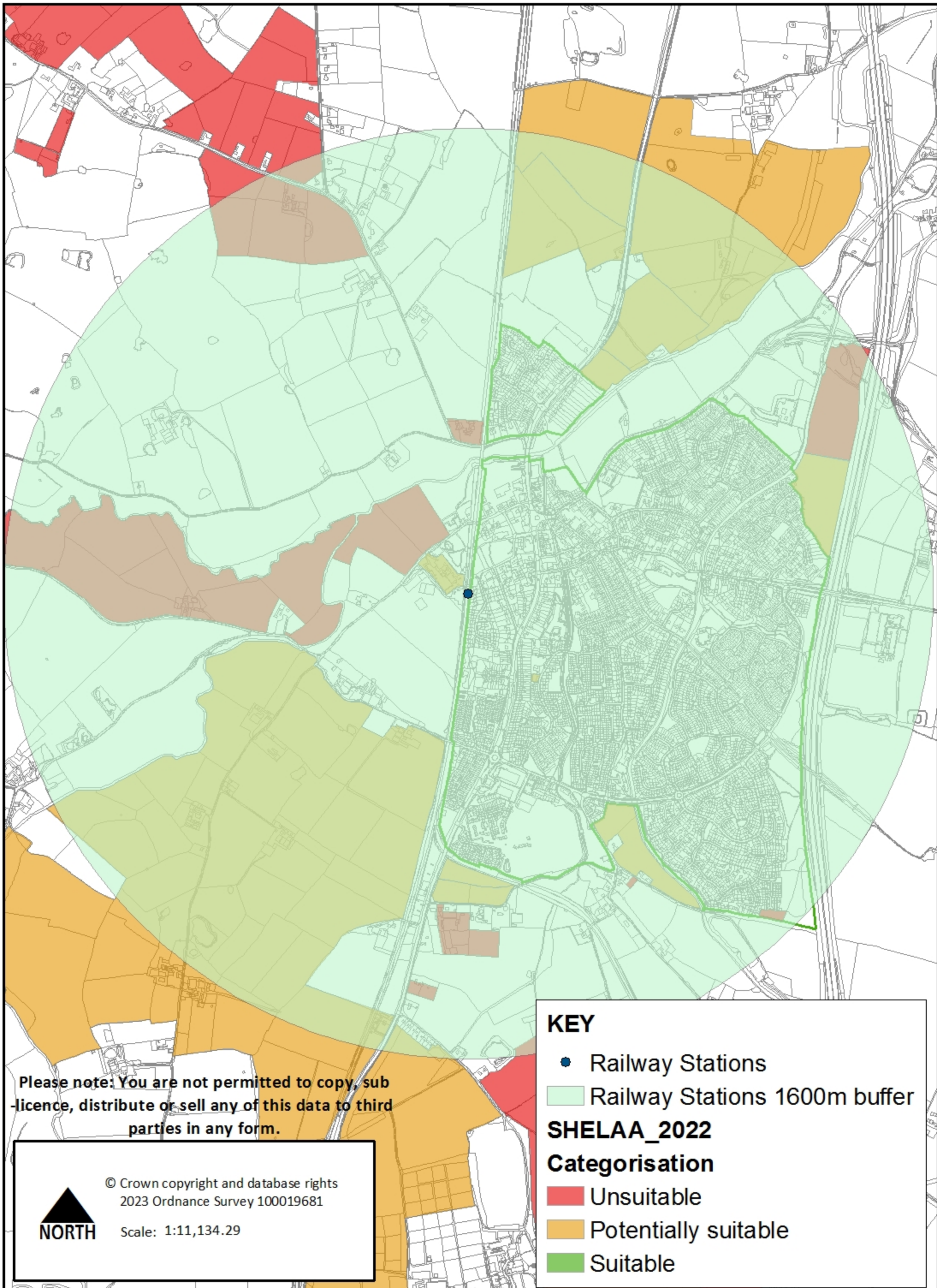
## KEY

-  Tier 1, 2 & 3 settlements boundaries
-  Educational Establishments 800m buffer
-  Retail Centres 800m buffer
-  South Staffs Boundary

# Land options at Codsall/Bilbrook within 1600m of rail station



# Land options at Penkridge within 1600m of rail station



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**NORTH** Scale: 1:11,134.29

**KEY**

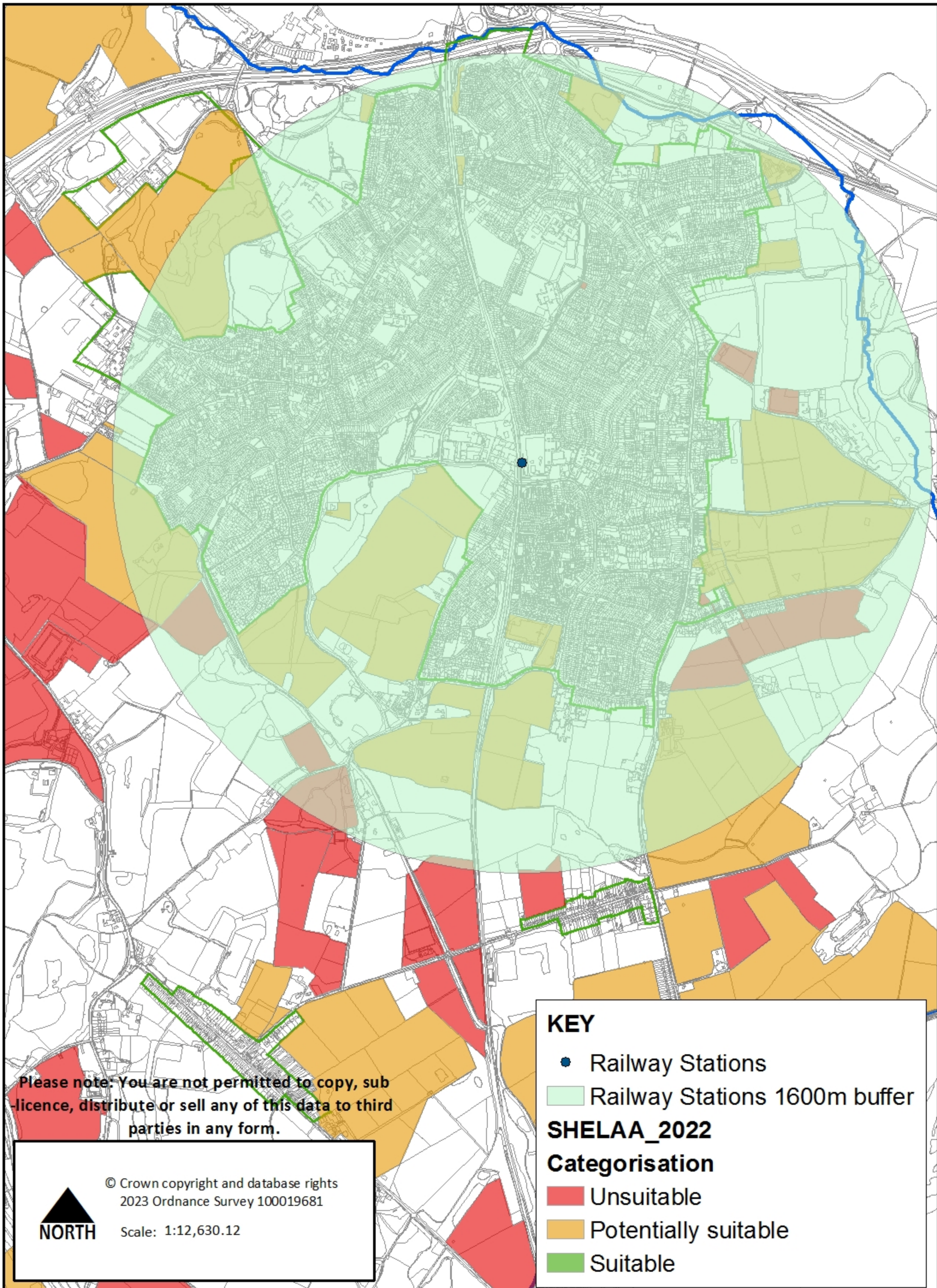
- Railway Stations
- Light Green Railway Stations 1600m buffer

**SHELAA\_2022**

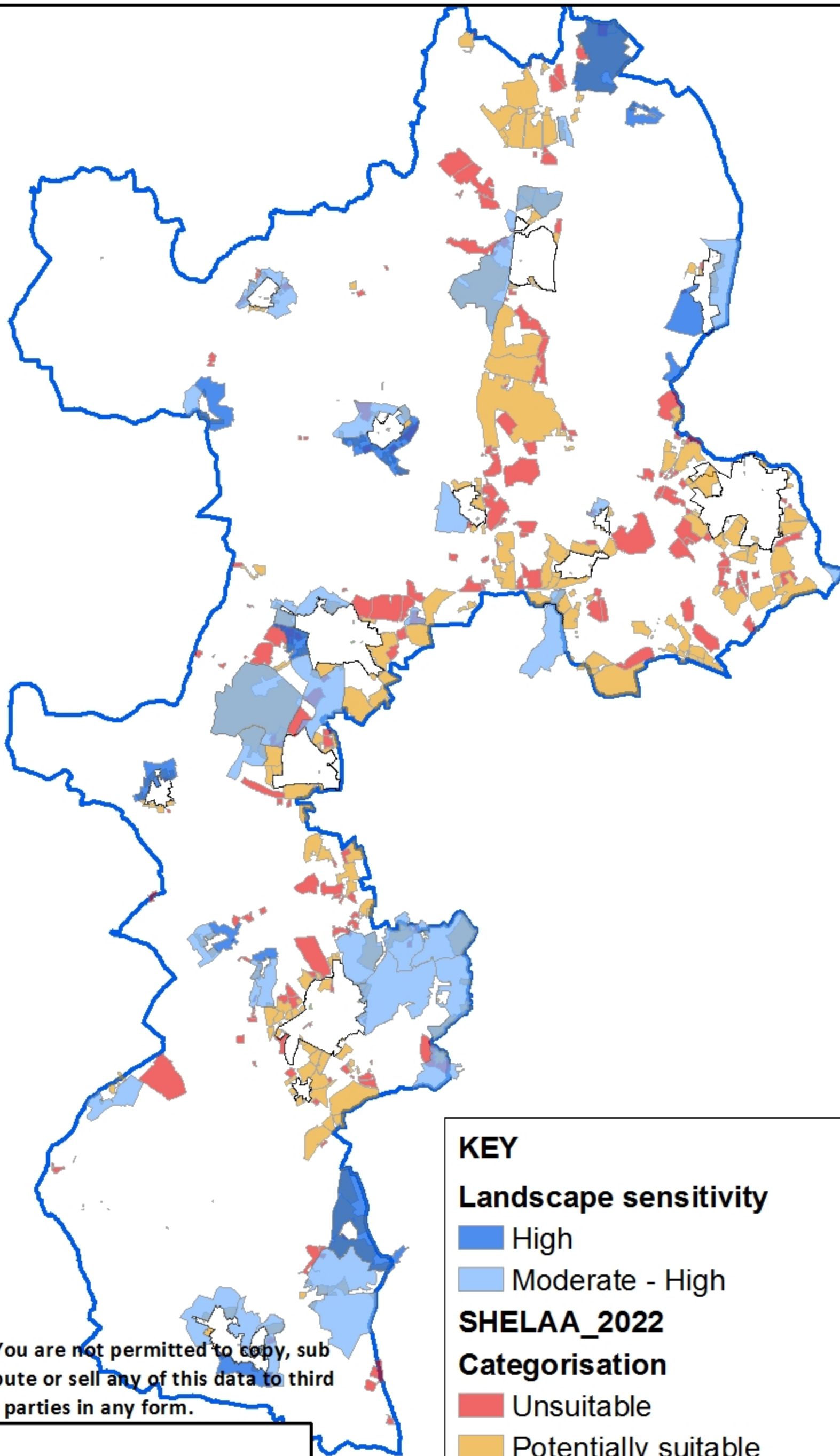
**Categorisation**

- Red Unsuitable
- Orange Potentially suitable
- Green Suitable

# Land options at Cheslyn Hay/Great Wyrley within 1600m of rail station



# Areas of higher landscape sensitivity and SHELAA sites



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## KEY

### Landscape sensitivity

- High
- Moderate - High

### SHELAA\_2022

#### Categorisation

- Unsuitable
- Potentially suitable
- Suitable
- Tier 1, 2 & 3 settlements boundaries
- South Staffs Boundary

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Scale: 1:111,492.52