

South Staffordshire Local Plan Examination

Response to Matter 6: Green Belt

St Philips (Orton Lane)

10 April 2025

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1.0 Introduction

- 1.1 This statement to Matter 6 (Green Belt) of the examination of the South Staffordshire Local Plan Review (“the LPR”) is submitted by Lichfields on behalf of St Philips in relation to their land interests at Land off Orton Lane or Sites: 416 and 416a (“the Site”). Please refer to the full introduction included within St Philips Matter Statement 5 in respect of Land off Orton Lane.
- 1.2 Separate representations have been submitted in respect of the following Matters:
- Matter 5 – Spatial Strategy; and
 - Matter 7 – Site Allocations.
- 1.3 This Statement has been prepared in line with the Guidance Note (SST/ED8) for the Examination.

2.0

Matter 6: Green Belt

Issue: Whether the Plan's approach to Green Belt is positively prepared, justified, effective and consistent with national policy.

Q. 2. The National Planning Policy Framework identifies that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries a strategic policy making authority should be able to demonstrate that it has fully examined all other reasonable options for meeting its identified need for housing. Have all opportunities to maximise the capacity on non-Green Belt land been taken? As such:

a. How has the Council sought to make as much use as possible of suitable brownfield sites and underutilised land?

b. Has the potential for development in the urban area, the use of previously developed land and increased densities been optimised including locations well served by public transport?

c. Has the Council assessed whether there is any realistic potential to accommodate some of the development needs of the district in other authority areas, reducing the need to alter the Green Belt? How has this been assessed/ investigated?

d. The need to promote sustainable patterns of development. Where is this evidenced?

2.1 Yes. Despite changes to the National Planning Policy Framework (2023) [NPPF] in relation to the need for Green Belt release, it does not preclude a local planning authority [LPA] from releasing Green Belt land, so long as an LPA has satisfied the 'sequential approach' in utilising its supply of brownfield land, optimising densities and engaging with neighbouring authorities to assist in meeting needs and demonstrating that exceptional circumstances exist (Paras 145-146, NPPF).

2.2 In this regard, St Philips considers that the South Staffordshire Council's ("the Council") 'Green Belt Exceptional Circumstances Topic Paper (April 2024)' (EB6) ("the GBES Topic Paper") has clearly demonstrated that the 'sequential approach' set out in paragraph 146 of NPPF has been followed, and – crucially – that 'exceptional circumstances' have been demonstrated. Crucially, the GBES Topic Paper demonstrated that:

- 1 The Council's 'Strategic Housing & Economic Land Availability Assessment Report (2023)' (EB19) [SHELAA], 'Housing Site Selection Topic Paper' (2024) (EB20-20b) [HSSTP], and 'Spatial Housing Strategy Topic Paper (2024)' (EB14-14a) [SHSTP], have maximised the use of non-Green Belt site options, including identifying all suitable brownfield opportunities, allocating safeguarded land and suitable Open Countryside sites as part of the preferred Spatial Strategy;

- 2 The Council's 'Housing Density Topic Paper (2024)' (EB21) [HDTP], and subsequently Policy HC2 (Housing Density), ensures that the Council is making an efficient use of land through increased densities to ensure Green Belt isn't released unnecessarily;
- 3 No neighbouring LPAs have offered assistance in meeting the Council's needs, as most of the neighbouring authorities are equally as constrained by Green Belt land, or are unable to meet their own housing needs – this is summarised in part within the Council's 'Duty to Cooperate Topic Paper Addendum (2024)' (DC1) [DtCTPA];
- 4 The Council's iterative Sustainability Assessment [SA] evidence (EB1-EB2b) confirmed the proposed Spatial Strategy would promote sustainable patterns of development.

2.3 It is St Philips' view that the Council has appropriately demonstrated the 'sequential approach' required by the NPPF and is 'sound', underpinned by relevant and up-to-date evidence (Para 31), is 'justified' (Para 35b) and is consistent with national policy (Para 35d).

Q. 5. Are there exceptional circumstances to alter the Green Belt in the district in principle? If so, what are they? If not, how could housing and employment requirements be met in other ways?

2.4 Yes. As set out in St Philips' response to Question 2 above, St Philips considers that the Council has sufficiently evidenced that it has taken a 'sequential approach', prior to considering whether 'exceptional circumstances' can be demonstrated, and the GBES Topic Paper (EB6) and supporting LPR evidence – listed above – suitably demonstrates this.

2.5 In respect of 'exceptional circumstances', neither the NPPF nor Planning Practice Guidance [PPG] provide clarity on what might constitute 'exceptional circumstances'. However, in this regard, it has long been established through the Calverton Parish Council v Nottingham City Council High Court Judgment,¹ at Paragraph 51 of the Judgment, that the following 5 issues should be grappled with:

- 1 *"the acuteness/intensity of the objectively assessed need (matters of degree may be important);*
- 2 *the inherent constraints on supply/availability of land prima facie suitable for sustainable development;*
- 3 *(on the facts of this case) the consequent difficulties in achieving sustainable development without impinging on the Green Belt;*
- 4 *the nature and extent of the harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and*
- 5 *the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent."*

2.6 Indeed, the Council's HSSTP (EB20-20b) references this judgment; albeit, in relation to the assessment of harm associated with the release of a particular parcel of Green Belt. Importantly, although not explicit, the Council appears to endorse points 1 and 4 for its own assessment of 'exceptional circumstances'. Ultimately, St Philips agree with the Council that the acuteness of the unmet housing need arising from the Greater Birmingham and Black Country Housing Market Area [GBBCHMA] – estimated by the Council to be in the order of c.31,000 dwellings up to 2042 as a minimum (DC1) – can, and in this instance should,

¹ Calverton Parish Council v Greater Nottingham Councils [2015] EWHC 10784

constitute ‘exceptional circumstances’, as established in the Calverton case. However, it should be noted that, in the context of point 4, exceptional circumstances can take precedence over the purposes of Green Belt purposes² – discussed further in St Philips’ response to Question 6 below.

- 2.7 As such, it is St Philips’ view that the Council has appropriately demonstrated the ‘exceptional circumstances’ required by the NPPF and is ‘sound’, underpinned by relevant and up-to-date evidence (Para 31), is ‘justified’ (Para 35b) and is consistent with national policy (Para 35d).

Q. 6. Are there exceptional circumstances to justify the release of Green Belt land for development in Tier 2, 3 or 4 settlements?

- 2.8 Yes. Fundamentally, the ‘exceptional circumstances’ test set out in paragraphs 145-146 NPPF does not require an LPA to distinguish ‘exceptional circumstances’ by settlement hierarchy. It is a ‘global’ test against which the LPA should consider whether circumstances exist which would justify reviewing the District’s Green Belt as a whole, and where this can be demonstrated, appropriate releases made that align with the wider objectives of the NPPF – such as promoting sustainable patterns of development; access to public transport; whether compensatory improvements could offset the harm from removal (Para 142, NPPF); and consistency of the Green Belt with the emerging Local Plan strategy.
- 2.9 In essence, whilst it is justified to consider whether ‘exceptional circumstances’ exist to justify Green Belt release, it is not necessary within national policy to consider the ‘exceptional circumstances’ on a settlement-by-settlement basis. This is because there is a need to consider the broader Green Belt policies and wider policies in the NPPF as a whole – such as those above but also enabling villages to grow and thrive to support services and infrastructure (Para 83) and also to respond to local needs (Para 82).
- 2.10 However, in the context of the question, it is an essential part of the ‘exceptional circumstances’ test that logically the establishment of ‘exceptional circumstances’ at the District-wide level must be capable of directing growth to lower-tier Green Belt settlements that are, or could be, made sustainable, and for trumping the purposes of the Green Belt². For example, it is conceptually possible for Green Belt land that fulfils strong Green Belt purposes in lower-tier settlements to be released if it is consistent with the Local Plan strategy for meeting requirements for sustainable development, for example, to secure more sustainable patterns of development or support the growth of local villages.

Q. 8. Are all detailed amendments to boundaries to the Green Belt clear and addressed in the evidence?

- 2.11 No. Whilst it is noted in the Inspector’s Matters, Issues and Questions [MIQs] that the Inspectors are not considering site-specific implications, it is worth highlighting St Philips site (416a) as an example to demonstrate that the Council’s amendments to the Green Belt boundaries are ‘unclear’ and not supported by evidence.
- 2.12 By way of example, St Philips’ western parcel falls within the ‘L’ shaped Safeguarded Land Site 416 – referred to as Land off Orton Lane in the LPR – which was removed from the Green Belt through the Site Allocations Document 2018 [SAD] and is now proposed for

² Paragraph 42, Calverton Parish Council v Nottingham City Council [2015] EWHC 1078

residential development under Policies DS5/SA3 in the LPR. However, the eastern parcel – contained to the west by the Land off Orton Lane allocation, east by Orton Lane, and south by existing residential development – continues to remain within the West Midlands Green Belt. This is because the Council’s proposed Spatial Strategy does not make any new allocations at Wombourne beyond the Safeguarded Land sites.

- 2.13 In this regard, it should be noted that this parcel (Site 416a) was formerly identified within the Land off Orton Lane allocation in the previous LPR Regulation 19 consultation undertaken in December 2022. The previous justification for the allocation of site 416a was set out as within the ‘Housing Site Selection Topic Paper (2022)’ – a copy of which has not been submitted for Examination in Public [EiP], but is appended to this Statement (Appendix 1):

“Site 416a is an area of greater landscape sensitivity than the majority of land around Wombourne, sitting in an area of ‘moderate-high’ sensitivity. The site is also in an area of similar Green Belt harm than the majority of land around Wombourne, sitting in an area of ‘moderate-high’ harm. However, the site is free from any significant constraints and is adjacent to an area of safeguarded land proposed for a housing allocation (Site 416). Its allocation would facilitate delivery of that site by providing access to the northern parcel of the safeguarded site and creating a more regular site shape when considered with the wider parcel.”

- 2.14 Subsequently, the ‘Council’s HSSTP (EB20-20b) sets out the following reasoning for making no new Green Belt allocations at Wombourne, stating:

“The Council’s preferred spatial housing strategy does not include the allocation of Green Belt land in Wombourne. No sites performed so well as to warrant departing from the preferred strategy.”

- 2.15 However, St Philips considers that the Council has not sufficiently demonstrated why site 416a was considered a sustainable site for allocation within the 2022 version of the LPR but is no longer considered to perform well enough to be allocated within the submitted LPR. Indeed, St Philips believes that the deallocation of site 416a does not make logical sense, nor make a logical amendment to the Green Belt boundary underpinned by evidence.

- 2.16 St Philips wishes to highlight that sites 416 and 416a performed identically within the previous iteration of the SA (EB3-EB3b), with the exception that site 416a was found to have higher levels of Green Belt harm and Landscape harm. However, this was purely on the basis that site 416 had already been removed from the Green Belt, and by virtue of its Safeguarded Land status has previously been assessed in terms of Green Belt harm and Landscape impact.

- 2.17 However, St Philips strongly contend that site 416a does not contribute significantly to the purposes of the Green Belt (Para 143). The development of the site would not lead to Wombourne merging with Wolverhampton. Furthermore, the site is set between Orton Lane and Safeguarded Land, and development within the site would not exceed the northern boundary of the Safeguarded Land. This would ensure no further encroachment upon the countryside. In addition, the allocation of the site (416a) would also create a new, well-defined Green Belt Boundary and would not lead to sprawl. The deallocation of the site

creates an illogical Green Belt Boundary. In this regard, St Philips notes that the NPPF is clear that:

“...Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.” (Para 145) (Emphasis added)

- 2.18 The Council’s previous evidence base also clearly recognised the logic of removing the site from the Green Belt and allocating site 416a alongside site 416. The ‘Green Belt Exceptional Circumstances Topic Paper (2022)’ – a copy of which has not been submitted for EiP, but is appended to this Statement (Appendix 2) – recognised that:

“The removal of the northeast section of the site from the Greenbelt and allocation for housing represents a logical extension to the existing allocation / Safeguarded Land...”

- 2.19 St Philips acknowledges that the NPPF does not require the Council to review Green Belt Boundaries and welcomes that the Council has chosen to do so anyway. Notwithstanding this, both the Council (previously) and St Philips clearly align on the fact that Site 416a represents a logical release from the Green Belt that would rationalise the Green Belt boundary in this area, when having regard to their intended permanence in the long term in a way that would endure beyond the plan period, in accordance with paragraph 145 of the NPPF. To this end, St Philips does not consider that all of the detailed amendments to boundaries to the Green Belt are clear or are addressed in the evidence.

Appendix 1 Housing Site Selection Topic Paper (2022)



Local Plan Review

Publication Plan

Housing Site Selection Topic Paper

November 2022

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Chapter 1. Introduction

The purpose of this paper

- 1.1 The purpose of this Topic Paper is to set out how the Council will assess and allocate housing site options to meet its proposed housing target for the Local Plan Review 2018-2039. It summarises which sites are proposed for housing and which are not, including summary reasons for this decision.
- 1.2 The criteria used for site selection were consulted on in the previous 2019 Spatial Housing Strategy and Infrastructure Delivery consultation and have been informed by comments received to that consultation and further evidence base work undertaken since the 2021 Preferred Options consultation. In order to show how sites performed against the various criteria, we have prepared detailed site assessment proformas for each site option. Each proforma seeks to summarise key elements of the Council's evidence base and site survey process relevant to each site in the manner proposed in the 2019 Spatial Housing Strategy & Infrastructure Delivery consultation. The Council has considered all factors in the round in arriving at a decision regarding which are the best performing sites in the District.
- 1.3 This paper must be read alongside the Council's Local Plan Review Publication Plan consultation, which summarises the selected housing sites, the wider housing strategy the Council are proposing and the next steps the Council will undertake following the current consultation.

Previous consultations on site selection methodology

- 1.4 To ensure that the Council's site selection criteria can be considered robust, the Spatial Housing Strategy and Infrastructure Delivery 2019 set out a methodology to be used for site selection and invited comments on whether the factors set out were correct and whether other factors should be considered. A number of responses were received to this consultation with respect of site selection, including submissions from local community groups (e.g. Parish Councils, Civic Societies), key stakeholders (e.g. other local authorities) and development industry representatives (e.g. housebuilders, local agents). The Council has taken account of these representations and amended the proposed methodology where necessary. The Council has also considered the findings of the Sustainability Appraisal and used these to inform where additional stakeholder comments may be required (e.g. from the Lead Local Flood Authority).
- 1.5 In response to these factors, the Council made a number of amendments to the site selection process at the 2021 Preferred Options consultation stage. Briefly summarising some of the key changes/points of clarification, these include:
 - Having regard to the Black Country's proposed threshold for automatically discounting land which would both result in 'Very High' Green Belt harm and is in an area of 'Moderate/High' (or greater) landscape sensitivity
 - Identifying brick clay areas as being of particular sensitivity when compared to other mineral safeguarding areas

- Ensuring that sites in Tier 1-4 villages or urban edge locations which do not strictly conform to Spatial Option G of the 2019 consultation are not excluded from assessment, particularly in light of Spatial Options D-G being assessed as all having similar sustainability impacts in the 2019 iteration of the Sustainability Appraisal
- Inclusion of likely approximate walking distances via existing footways from the centre of a site to existing services and facilities, including public transport where available, recognising that these may be different to as-the-crow-flies catchment distances in many instances
- Seeking initial Highways Authority comments on each site to indicate which sites may raise greater levels of highways concerns than others
- Seeking initial Lead Local Flood Authority comments to identify site options which can satisfactorily mitigate surface water flood risk issues
- Consideration of whether sites include areas of High or Very High Habitat Distinctiveness, based on work undertaken with the Staffordshire Wildlife Trust (Nature Recovery Network mapping – Appendix D/Map 1)
- Identifying where sites would completely fill in a remaining gap between two of the District's villages or between a village in the District and a neighbouring town/city, to ensure risks of coalescence are recognised

Chapter 2. Identifying and narrowing down sites for consideration

- 2.1 The Council has undertaken many 'Call for Sites' consultations over a number of years. This invites landowners and agents to submit details of sites including location, size of site, details of any constraints and which have a willing landowner. These sites form the basis of the Council's Strategic Housing & Economic Land Availability Assessment (SHELAA), which lists all of the sites formally suggested to the Council for housing.

SHELAA 2022

- 2.2 To help to identify a shortlist of sites for allocation in the Local Plan Review, the SHELAA categorises sites using the categories set out below, which were agreed with local agents, developers and duty to cooperate partners through the preparation of the SHELAA:

S1	Sites currently suitable for housing and deliverable within 5 years
S2	Sites currently suitable for housing and developable between 5 and 10 years
S3	Sites currently suitable for housing and developable 10+ years
NCD1	Sites potentially suitable for housing but not currently developable because of a policy designation (eg Green Belt/Open Countryside/Employment Land/outside current Spatial Strategy/Safeguarded Land Policy)
NCD2	Sites potentially suitable for housing but not currently developable because of other constraints
NS	Sites which are unsuitable because of constraints which cannot be overcome.

- 2.3 To focus the assessment of potential housing site allocations on sites which could be suitable for allocation, the Council has only considered the allocation of sites which are either suitable (i.e. S1, S2 and S3), or could potentially be made suitable through the removal of a policy or physical constraint and a more thorough assessment of the site's context (i.e. NCD1 and NCD2). This seeks to avoid the allocation of sites which are fundamentally less suitable for housing, such as isolated sites which are poorly related to existing settlements, sites which are required to meet current needs for open space and community facilities, and sites which are adversely affected by key environmental designations. All unsuitable sites not assessed further for allocation are set out in the 2022 SHELAA.

Spatial Housing Strategy

- 2.4 To further narrow down which sites will be selected for allocation, sites have only been assessed for allocation where they are in a potential location for growth in one of the Council's better performing Spatial Housing Strategy options, as identified in the 2019 Sustainability Appraisal. These strategy options built upon the 2019 Rural Services and Facilities Audit, which classified the District's rural settlements as Tier 1-5 settlements based on their relative level of services and facilities. They also built on the 2018 SHELAA, which identified numerous locations adjacent to neighbouring towns and cities with potential housing site options.
- 2.5 The 2019 Sustainability Appraisal of Spatial Options identified Spatial Options D-G as all having similar sustainability impacts, so sites have been assessed for housing allocations if

they fell within a broad location proposed for growth in one of these options. As these Spatial Options considered growth across Tier 1-4 settlements and all urban edge locations, sites in these areas have been taken forward for site assessment. Whilst no upper size limits have been put on the site sizes taken forward, it must be stressed that all better performing spatial options primarily focused residential growth on more sustainable areas of the District (i.e. Tier 1 settlements and areas adjacent neighbouring towns and cities) giving limited or no residential growth to the District's less sustainable settlements (Tiers 3&4).

- 2.6 Taking this approach, the Council has not assessed any sites assessed as 'potentially suitable' in the SHELAA if they are adjacent to Tier 5 settlements or are in isolated locations, meaning sites in these locations have been discounted. The Council has also only assessed new settlement options which sit within the new settlement areas of search along the West Coast Mainline/A449 set out in the GBHMA Strategic Growth Study¹, meaning that freestanding sites outside of this key corridor have also been discounted. Site options discounted for these reasons are set out in **Appendix 1**. The Council is adopting this approach to ensure that the evidence gathering process for each site is proportionate and focuses more detailed assessment on sites which are more realistic candidates for development, in accordance with National Planning Practice Guidance.

Site size threshold for new allocations

- 2.7 In the first instance, sites will only be assessed for housing allocations where they will provide affordable housing on site, in order to ensure the district's and GBHMAs needs for both market and affordable homes are met within the plan period. Initially, a minimum indicative site size of 0.28ha will be applied, recognising that this is the minimum site size likely to deliver a scheme of 10 or more dwellings at 35 dwellings per hectare. Whilst the Council will initially apply this as a blanket threshold, it may consider sites slightly below this size, provided that it is satisfied that a satisfactory scheme of 10 or more dwellings could be accommodated on the site, without compromising the character and appearance of the surrounding area. Site options discounted for this reason are set out in **Appendix 1**.
- 2.8 The purpose of this 0.28ha threshold is to ensure all allocation sites meet the minimum site capacity required to trigger the need for affordable homes to be provided on site, whilst still ensuring that a sufficient number of small site options can be identified to provide 10% of the proposed plan target on sites of 1ha or less. This threshold will ensure the Council's duties to meet both its need for affordable housing and its need for small site delivery can be met within the plan period. The Council has also undertaken additional proactive scoping work through the latest SHELAA to understand if any development boundary brownfield sites of 5 dwellings or more² could contribute towards the District's housing requirement. Any sites identified through this were added to the SHELAA and were considered for their suitability and availability through that document. However this did not reveal any additional supply of deliverable or developable sites capable of accommodating 5-9 dwellings, nor did

¹ See Table 5 of the GBHMA Strategic Growth Study 2018, which identifies the potential for new settlement options in this corridor "Around Dunston" and "Between Wolverhampton and Penkridge"

² Reflecting the threshold for sites' inclusion on the Council's Brownfield Land Register

it highlight any additional deliverable or developable housing sites of 10 or more dwellings which were not already included in previous site assessment papers.

Grouping by broad location

- 2.9 The District does not contain a single city or town to focus growth upon. It is a rural area consisting of a wide variety of villages and urban edge locations with different levels of services and facilities and strategic constraints. Because of this, sites have been grouped into their relevant settlements and urban edge areas of search identified in the Council's 2019 Spatial Housing Strategy and Infrastructure Delivery consultation³. This allows options to meet growth identified in that strategy to be compared with other sites in that settlement/urban edge area. The Council has taken this approach to ensure that the strategic sustainability and constraints/opportunities of different broad locations are properly reflected in the site assessment process.

Summary

- 2.10 Taking all of the above together, the Council has assessed all potential housing site options which satisfy the following conditions:
- were assessed as 'suitable' or 'potentially suitable' in the SHELAA 2021
 - are potential extensions to any neighbouring town or city **or** are potential extensions to Tier 1-4 settlements identified in the Rural Services and Facilities Audit **or** are a freestanding new settlement option in the area of search along the A449/West Coast Mainline
 - have capacity to accommodate 10 or more gross dwellings if allocated
- 2.11 These sites have then been grouped together into their relevant broad locations, i.e. specific Tier 1-4 settlements or areas of search adjacent to neighbouring towns and cities.

³ See Appendices 3 and 4 of the 2019 Spatial Housing Strategy and Infrastructure Delivery consultation for the rural settlements and areas of search for urban extensions considered for growth

Chapter 3. How housing site options were assessed

- 3.1 Completing the filtering process set out in Chapter 2 left the Council with a shortlist of sites that were potential options for meeting the district's development needs, grouped into their relevant broad locations.
- 3.2 To ensure all relevant factors for site selection are highlighted on a site-by-site basis, the Council has prepared proformas for each of the sites shortlisted for assessment. These consistently record information under the following topics for each site:
- Sustainability Appraisal (SA) findings
 - Conformity with infrastructure led strategy and opportunities for infrastructure delivery
 - Sequential test
 - Green Belt harm
 - Landscape sensitivity
 - Impact on historic environment
 - Known site constraints
 - Site opportunities
 - Summary conclusions
- 3.3 The approach taken to recording information under each of these factors is set out below.

Sustainability Appraisal (SA) findings

- 3.4 The Council commissioned consultants (Lepus) to undertake a Sustainability Appraisal of all shortlisted housing site options. This considered a range of secondary data sources to predict key sustainability effects likely to result from new sites against a range of sustainability objectives. Predicted effects within the Sustainability Appraisal fall within the following categories:
- Major Positive
 - Minor Positive
 - Uncertain
 - Negligible
 - Minor Negative
 - Major Negative
- 3.5 Within the site assessment proformas, major positive and major negative effects arising within the post-mitigation site assessments in the 2022 Sustainability Appraisal are recorded. The Council has used the post mitigation assessments to inform site selection to ensure that major negative effects likely to be mitigable are not considered as barriers to development. The Council has had regard to the full assessment of effects for each site in the Sustainability Appraisal but has highlighted the major effects in the proformas to ensure the most significant likely effects are clearly set out.
- 3.6 In most instances, it is likely that unmitigable major negative effects set out in the Sustainability Appraisal will be a significant barrier to a site's delivery, to ensure that

demonstrably unsustainable site options are not selected. However, there are a very large number of site suggestions that are predicted to have major negative effects under the landscape criteria due to being in more sensitive areas within the Green Belt Study 2019 and Landscape Sensitivity Assessment 2019⁴. In such instances, these major negative effects on the landscape criteria have not been treated as a significant constraint on development.

- 3.7 The Council has had to take this due to two principal reasons. Firstly, the 2019 Spatial Housing Strategy and Infrastructure delivery consultation has shown at a strategic level that distributing development based upon less sensitive Green Belt areas would result in a less sustainable pattern of development⁵. This reflects the fact that there is very limited land in the District's more sustainable locations⁶ that is not in more sensitive Green Belt and landscape areas identified within the Sustainability Appraisal. Secondly, correspondence from the Association of Black Country Authorities in response to the Council's Spatial Housing Strategy consultation indicates that they are intending to use a much higher threshold than the Sustainability Appraisal currently proposes for discounting sites on Green Belt and landscape harm. This is important as South Staffordshire's Green Belt and landscape studies use the same methodology as the Black Country authorities' evidence on the matter.
- 3.8 Major negative landscape effects arising on Green Belt harm/landscape sensitivity grounds will be noted in the site assessment proformas. However, due to the factors highlighted above, the proformas will note that failing to consider such areas' potential for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence.

Conformity with infrastructure led strategy and opportunities for infrastructure delivery

- 3.9 Under this criterion, the Council has made a judgment about the likely ability of a specific site to meet the aims of the preferred infrastructure-led housing strategy for the District, as set out in Publication Plan document. This meant different things for different areas of the district, but has included consideration of the following:
- The preferred level of growth for that broad location and whether the site would be disproportionate to that
 - The potential to deliver any identified infrastructure needs or opportunities for that broad location

⁴ The Sustainability Appraisal records a Major Negative effect on the landscape criteria where a site is either within a 'Moderate/High', 'High' or 'Very High' harm Green Belt parcel or is within a 'Moderate/High' or 'High' landscape parcel.

⁵ See assessment of Spatial Option B in the August 2019 Sustainability Appraisal for the Spatial Housing Strategy and Infrastructure Delivery document

⁶ E.g. Tier 1 settlements and land adjacent to neighbouring towns and cities with higher order services and unmet housing needs

- Consideration of what site typology is planned for that area (e.g. small sites of less than 1ha, large sustainable urban extensions, areas of safeguarded land planned for allocation, brownfield land opportunities etc.)
- 3.10 In addition to this, the Council has also recorded approximate distances from the centre of each site option to existing key infrastructure using safe and well-lit footway connections (rather than direct as-the-crow-flies distances). Distances to the following facilities (where available in a broad location) were recorded;
- Train station
 - Regular bus stops identified by Staffordshire County Council in the District or in neighbouring urban areas
 - Village or neighbourhood centre, or convenience store
 - Nearest education facility (primary/secondary school or first/middle/high school)
- 3.11 This information overlaps with some of the information recorded in the Sustainability Appraisal, which considers catchments from many of the above facilities to sites. However, the Council has still chosen to record the above recognising that the Sustainability Appraisal walking catchments do not have regard to on-the-ground walking routes or pedestrian footways. This extra information therefore offers an opportunity to sense check the degree of pedestrian connectivity to infrastructure on a site-by-site basis.

Sequential test (opportunities for non-Green Belt development)

- 3.12 To minimise more sensitive land release, and as part of the Council's wider duty to only release Green Belt in exceptional circumstances, this criteria has considered whether a housing site option to meet a specified development need of a broad location is within:
- the development boundary of an existing settlement
 - safeguarded land previously removed from the Green Belt
 - Open Countryside beyond the Green Belt
 - Green Belt
- 3.13 This has enabled the Council to give weight to any less sensitive (e.g. non-Green Belt) options which could meet a broad location's development needs, ensuring that this is a prominent factor in the site selection process. However, other factors such as landscape sensitivity, the need to retain a site for a certain use or other site-specific constraints may still, on balance, override this issue. It is therefore important to note that a site being outside of the Green Belt does not automatically mean that it will be considered more favourably than Green Belt site options.

Green Belt harm

- 3.14 National policy and case-law⁷ requires that, before concluding exceptional circumstances exist, the Council must give consideration to the nature and extent of harm to the Green Belt and its purposes before considering release of a Green Belt site.
- 3.15 To ensure the Council had sufficient information to make this judgement for each individual development site, a comprehensive Green Belt Study 2019 was jointly prepared with the Black Country local authorities. This categorised the harm that would result from release Green Belt land across the District into the following categories:
- Very high
 - High
 - Moderate-high
 - Moderate
 - Low-moderate
 - Low
 - Very low
- 3.16 This harm rating has been consistently recorded for each site suggestion in the relevant section of the proforma. Where a mixture of harm ratings existed within a site boundary, the extent of these was briefly summarised.

Landscape Sensitivity

- 3.17 Due to the District's spatial characteristics, the vast majority of site suggestions considered by the Council to accommodate new growth are on greenfield countryside land surrounding the villages and urban edges of neighbouring towns and cities. To ensure the site selection considers this issue, the Council has prepared a jointly commissioned Landscape Sensitivity Assessment 2019 with the Black Country authorities.
- 3.18 This study examines the landscape and visual sensitivities within individual assessment areas, establishing the sensitivity of an area of landscape to employment and housing development. This categorises the landscape surrounding existing settlements across the District into the following categories of sensitivity:
- High
 - Moderate-high
 - Moderate
 - Low-moderate
 - Low
 - Very low

⁷ Calverton Parish Council v Greater Nottingham Councils & others (2015)

- 3.19 This sensitivity rating was consistently recorded for each site suggestion in the relevant section of the proforma. Where a mixture of landscape sensitivity ratings existed within a site boundary, the extent of these was briefly summarised.

Impact on Historic Environment

- 3.20 To ensure the impact on the historic environment of sites coming forward is consistently and robustly assessed, a Historic Environment Site Assessment has been prepared by an appropriately qualified consultant to inform the site selection process. Stage 1 & 2 of this work has been prepared in consultation with Historic England to ensure the findings of the study are robust and will have full regard to all relevant Historic England guidance in its methodology.
- 3.21 The Historic Environment Site Assessment assesses the potential harm to the historic environment arising from site options. For both direct and indirect potential heritage harm, the assessment draws one of the following conclusions using a RAG score approach:
- Green: no concerns identified, on current evidence, although archaeological mitigation measures may be required
 - Amber: no significant effects which cannot be mitigated are at present predicted
 - Red: significant effects which cannot be mitigated are at present predicted
- 3.22 The Council has recorded these conclusions under the relevant section of the site assessment proforma. For proposed site allocations a more detailed targeted Stage 2 assessment has also been undertaken to assess historic environment impacts in more detail and to identify necessary mitigation measures. Where the findings of the Stage 2 work indicate that a proposed allocation may no longer be suitable or needs to be significantly reduced in size to avoid significant effects, this has been reflected in the site assessment proforma.

Known site constraints

- 3.23 In addition to the evidence base listed above, a number of other factors may influence how suitable a site is to accommodate a planned level of growth for that area. To this end, the Council has considered a variety of other site constraints through the site survey process that may shape or prevent the delivery of housing on a site.
- 3.24 Most of these factors have been identified internally by the Council through the site survey process and include the following, which are recorded (where relevant) within the site assessment proforma;
- Potential access issues, including where development to affect important vegetation (e.g. hedgerows, tree belts, TPOs)
 - Potential for loss of current important land use (e.g. open space, employment sites, community facilities)
 - Natural environment constraints (e.g. contains or is adjacent to designated or non-designated wildlife sites, AONB, SAC)

- Areas of high or very high habitat distinctiveness identified in the Network Recovery Mapping prepared by Staffordshire Wildlife Trust
 - Areas of flood zones 2/3 that may constrain site layout
 - Coal mining risk areas and mineral safeguarding areas
 - Areas that would coalesce two settlements if allocated
 - Other potential physical constraints (e.g. topography, adjacent bad neighbour uses, contamination risks etc.)
- 3.25 In addition to the above, the Council has also sought the initial views of the Highways Authority on each site, to identify which sites may raise concerns if allocated. The full list of sites and their relevant highways comments are set out in **Appendix 2**, with the relevant highways comment for each site recorded under this section of the site assessment proforma.
- 3.26 A substantial number of site options overlap with areas of surface water flood risk. This has led to the individual site comments being sought from the Lead Local Flood Authority (LLFA), which are set out in relevant housing site assessment proformas in **Appendix 3**. These ensure site selection is informed by an initial view from the LLFA as to whether any surface water flood risk could likely to mitigated through scheme design.
- 3.27 During the 2021 Preferred Options consultation some sites received additional specific comments from statutory consultees that would affect whether the site is considered suitable for development or not (e.g. Natural England and the Cannock Chase AONB unit). Where relevant, these have now also been included within the site proforma.

Site opportunities

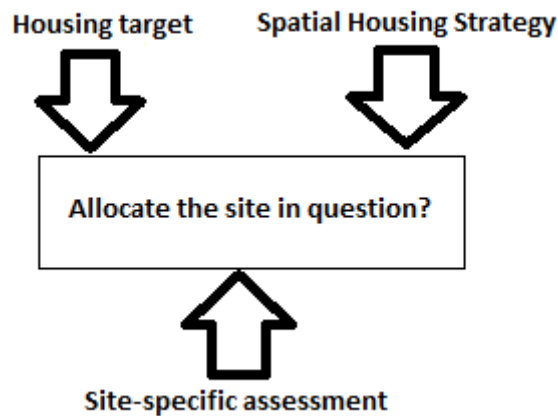
- 3.28 Whilst this criterion will not apply to many sites to any significant degree, some of the opportunities and design benefits below are particularly relevant to specific sites. Such opportunities include:
- connections into adjacent active travel or green infrastructure networks
 - sizeable land parcels' ability to provide additional 'compensatory' green infrastructure in the Green Belt
 - potential to accommodate a permeable block layout
 - extent to which site is contained by existing natural boundaries
 - opportunities to continue existing street scene along site frontage
 - opportunity to redevelop previously developed land
- 3.29 These are noted in the pro-forma where relevant, so that they can inform the relevant merits of different growth options and potential policy requirements on specific sites.

Summary conclusions

- 3.30 In order to offer a brief summary of a site option's merits compared to other site options in the same broad location, each proforma contains a summary of a few key comparators for each site. These typically include the following, where relevant to the site in question:
- If the site is a non-Green Belt/Open Countryside development option
 - Relative degree of Green Belt harm, compared to other options in the same broad location
 - Relative level of landscape sensitivity, compared to other options in the same broad location
 - Any major positive or negative Sustainability Appraisal scores for the site
 - Ability of site to deliver preferred spatial strategy in areas where achieving preferred strategy is dependent on-site typology/location/infrastructure delivery
 - Significant effects on historic environment that are unlikely to be mitigated
 - Other constraints more likely to affect site deliverability (e.g. LLFA/Highways Authority objection, areas of high habitat distinctiveness on majority of site, brick clay safeguarding areas, loss of an essential facility, lack of pedestrian connectivity, site shape unlikely to accommodate residential layout etc.)
- 3.31 It is important to note that these summaries of key points are not considered in isolation when selecting sites, but are simply designed to record some of the more potentially significant factors recorded in the site selection process consistently across each site option in a broad location. The full set of factors considered by the Council in selecting sites is summarised in the next section.

Chapter 4. How preferred housing allocations were selected

- 4.1 Once all potential site options were assessed across the District, the Council then considered which sites to allocate in order to deliver its proposed housing target of 8,881 dwellings between 2018 and 2038. This process involved considering a balance of top-down strategic factors and bottom-up site-specific factors, which are shown in the diagram below:



- 4.2 The site selection process combines these top-down and bottom-up factors to arrive at a decision as to which sites should be selected. How these factors have influenced the selection of sites are set out below.

Housing Target & Spatial Housing Strategy

- 4.3 The Council's proposed housing target is set out in Section 4 of the Council's Local Plan Review – Preferred Options consultation. This housing target aims to meet the Council's own needs whilst making an appropriate contribution to unmet needs in the wider housing market area, informed by regional evidence⁸. The Council has also identified a preferred Spatial Housing Strategy for the District, which was identified through the 2019 Spatial Housing Strategy and Infrastructure Delivery consultation and has since been refined where necessary to reflect site assessment outcomes in the Preferred Options 2021 and Publication Plan 2022. This provides a preferred distribution of housing growth across the District, alongside site typologies and high-level infrastructure requirements that may help to facilitate this.
- 4.4 It is important that these factors are considered, as the site selection process needs to deliver the preferred housing target and a sustainable distribution of housing across the District as a whole. This means the final selected sites have regard to the amount of growth proposed in each broad location and the site typologies/infrastructure issues intended for each area, whilst ultimately delivering enough land across the District to ensure the overall housing target is met.

⁸ Greater Birmingham Housing Market Area Strategic Growth Study 2018

Site-specific proformas

- 4.5 The Council has prepared a pro-forma for each potential site option using the methodology set out in Chapter 3 of this topic paper. This provides the Council with a consistent set of findings for each site against alternatives in the same settlement or urban edge location. These can then be considered alongside the level and type of growth planned for that area. This allows the spatial housing strategy to be tested and amended (where necessary) having regard to site-specific factors, to arrive at a set of preferred locations for growth.

Drawing the evidence together

- 4.6 The findings of the site assessment process for each area of the District are summarised under the relevant section of Chapter 5 of this topic paper. In each broad location the Council has weighed up the District's preferred housing target, Spatial Housing Strategy and site-specific proforma findings together to arrive at a series of preferred housing site allocations. Where a site has not been allocated, this is because these sites are not considered to have performed as well as other site options in that broad location, considering all factors in the round.
- 4.7 This holistic approach has also allowed the Council to identify where the strategy proposed in the 2019 Spatial Housing Strategy and Infrastructure Delivery consultation should be adjusted to reflect site-specific issues. For example, in some instances the site assessment process has revealed significant infrastructure or sustainability constraints in broad locations or site typologies identified for growth in the previous consultation and has reconsidered the level of growth or typology proposed. In other areas, the site assessment process has revealed sites that perform well despite not strictly fitting the site typologies consulted on in the 2019 Spatial Housing Strategy and Infrastructure Delivery consultation.
- 4.8 In each case a judgement has been made having regard to all relevant factors in the round as to whether a departure from the approach set out in the 2019 Spatial Housing Strategy and Infrastructure Delivery consultation is justified. This has then informed the final spatial housing strategy proposed in the 2022 Publication Plan.

Chapter 5. Site assessment findings

- 5.1.1 The site assessment findings for each settlement and urban edge location in the District are presented in this section. Following the filtering process set out in Chapter 2 of this document, these site assessments cover all remaining site options in the following broad locations.

Table 1: Broad locations considered through the site assessment process	
Areas assessed	Broad location
Tier 1 settlements	Penkridge
	Bilbrook/Codsall
	Cheslyn Hay/Great Wyrley
Tier 2 settlements	Wombourne
	Brewood
	Kinver
	Perton
	Huntington
Tier 3 settlements	Essington
	Coven
	Featherstone
	Shareshill
	Wheaton Aston
	Pattingham
	Swindon
Tier 4 settlements	Bednall
	Dunston
	Bishops Wood
	Bobbington
	Trysull
	Seisdon
	Himley
Areas of search for urban extensions	Employment-led growth at ROF Featherstone
	Northern edge of the Black Country urban area
	Western edge of Black Country urban area
	West of Cannock (A5 corridor)
	South of Stafford (A34 corridor)
Area of search for freestanding new settlement	A449/West Coast Mainline corridor between Wolverhampton and Stafford

- 5.1.2 For each of the above areas, the following information is summarised:

- the level and type of growth proposed in the Spatial Housing Strategy to meet the District's housing requirement
- the existing major planning permissions and housing allocations in that area likely to come forward during the plan period
- new proposed housing allocations in that broad location, grouped into similar policy areas relevant to that area (e.g. development boundary, safeguarded land, Open Countryside, Green Belt)
- summary reasons for each proposed housing allocation

5.2 Penkridge

- 5.2.1 The Council's preferred Spatial Housing Strategy, as set out in the Council's Local Plan Review – Publication Plan consultation, seeks to locate significant housing growth at Penkridge over the plan period 2018 to 2039. At a strategic level, this recognises the settlement's level of facilities and public transport links compared to other rural settlements in the District, the recommendations of the GBHMA Strategic Growth Study, the availability of non-Green Belt land and the potential infrastructure benefits that could be delivered by large scale growth in this area.
- 5.2.2 Existing planning permissions and dwellings completed after 1 April 2018 can deliver approximately 529 dwellings during the plan period. Key sites contributing towards this figure are set out in Table 2 below. Please note this table does not include all small planning permissions in and around this location, focusing on large sites only (10+ dwellings).

Table 2			
Site reference	Site address	Planning approval reference	Dwelling delivery 2018 - 2039
Existing planning permissions			
PK/182	Land North of Penkridge	19/00862/REM	200
PK/165	Lyne Hill Phase 1	15/00775/REM	2*
PK/165	Lyne Hill Phase 2/3	15/01089/REM	206**
PK/165	Lyne Hill Phase 4	15/01124/FUL	74
PK/165	Lyne Hill Phase 5	16/01054/FUL	15
PK/186	Land north-west of Stafford Rd	21/00977/REM	24

*48 additional dwellings completed prior to 1st April 2018

** 66 additional dwellings completed prior to 1st April 2018

- 5.2.3 Summary conclusions from the site assessment process for housing allocations are set out below. The Council has had regard to the relative merits of all sites in selecting its preferred sites, which are summarised in full in the proformas set out in Appendix 3. The conclusions set out below are only intended as a narrative summary of key points and should be read alongside the full site assessment pro-formas and the wider evidence base that has informed the Council's site selection.

Summary of proposed allocations in Penkridge

New development boundary sites and existing allocations being re-confirmed as suitable
- None

Allocations on existing safeguarded land

- Sites 005 (Land off Cherrybrook Drive) – minimum delivery of approximately 88 dwellings

New allocations on Open Countryside land around Penkridge

- Site 420 (land North of Penkridge off A449 (East) – minimum delivery of approximately 29 dwellings

- Site 584 (land North of Penkridge off A449) – minimum delivery of approximately 350 dwellings in addition to existing planning permissions (19/00862/REM) on the site

- Site 010 (land at Lower Drayton Farm) - minimum delivery of approximately 750 dwellings

New allocations on Green Belt land around Penkridge

- Site 006 (land off Boscomoor Lane) – minimum delivery of approximately 80 dwellings

- 5.2.4 To assist in explaining the Council's reasons for allocation, narrative reasons for the selection of the sites are also summarised below. These should be read alongside the site assessment pro-formas in Appendix 3, which have been considered in full by the Council before reaching any decisions regarding new allocations.

Reasons for development boundary allocations

- 5.2.5 There are significant existing completions and planning permissions within the development boundary of the village, primarily at the former Lyne Hill Industrial Estate. However, outside of existing planning permissions, no further large site suggestions have been made within the development boundary. Therefore, no development boundary locations are proposed for new housing allocations.

Reasons for safeguarded land allocations

- 5.2.6 Penkridge contains an existing safeguarded land site outside of the Green Belt. This site is non-Green Belt and needs to be proactively explored for its potential to assist in meeting the District's proposed housing target. The sites assessment process has revealed no unmitigable constraints to the delivery of the safeguarded land in Penkridge. Given this, and the site being considered suitable for safeguarding through the examination of the Site Allocations Document as recently as 2018, the site is considered suitable for housing allocation.

Reasons for additional Open Countryside allocations

- 5.2.7 The Council's site selection process has not revealed any additional deliverable development boundary sites and it is clear that additional land release beyond the development boundary will be required to realise the Council's preferred Spatial Housing Strategy. Having regard to the full site assessment findings around the village, as set out in Appendix 3, **Open Countryside land on Sites 420, 584 and 010 is considered the most appropriate option for delivering the Council's Spatial Housing Strategy.** Reasons for the selection of these sites are summarised below.

Sites 420, 584 and 010 (Land north of Penkridge and at Lower Drayton Farm)

- 5.2.8 Based upon the lack of further deliverable development boundary sites in this broad location, it is clear that significant additional land release outside of the development boundary will be required to realise the Council's infrastructure-led approach to housing growth in Penkridge.
- 5.2.9 There are two clusters of potential site options that could allow Penkridge to expand to either the north or south, as the village is tightly constrained by transport infrastructure (the West Coast Mainline and M6 motorway) to the east and west. The Open Countryside to the north of the village has been recognised as a strategic location for housing growth in the 2018 GBHMA Strategic Growth Study, which identified the location for a large-scale extension based on garden village principles. Whilst they are in separate ownerships, Sites 420, 584 and 010 could provide an opportunity to deliver a large-scale mixed-use scheme

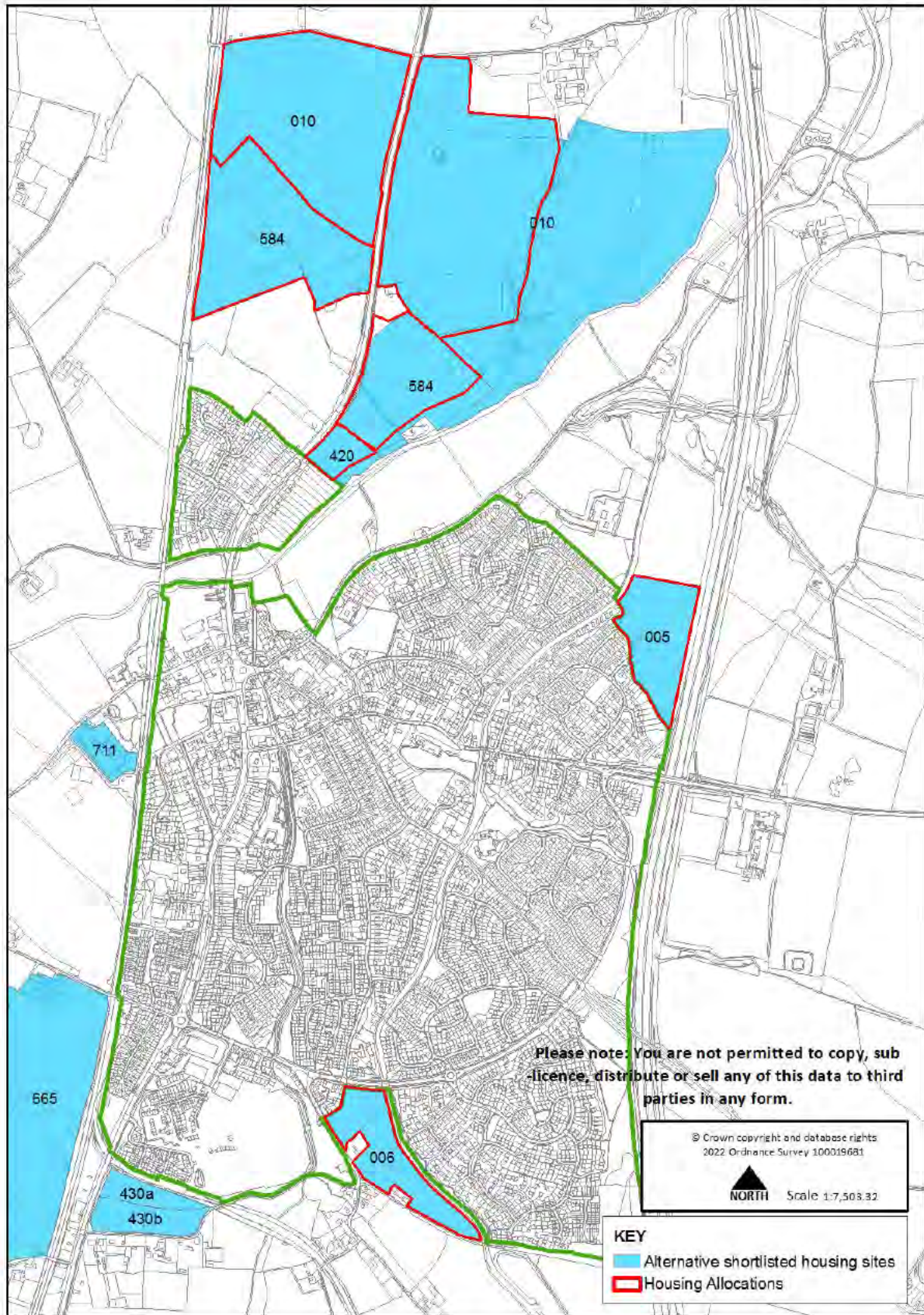
with on-site education infrastructure, retail and strategic green infrastructure. As the majority of land promoters in this area are now working with the Council to deliver a site-wide masterplan relating to design and delivery of onsite infrastructure, it is considered that this area should be allocated for housing growth and should be released from the Open Countryside.

Reasons for additional Green Belt allocations

- 5.2.10 Whilst the 2019 Spatial Housing Strategy and Infrastructure Delivery consultation did not propose Green Belt release around Penkridge, focusing allocations on the large Open Countryside land to the north, it is still important for the Council to remain responsive to the findings of the site selection process. Having regard to the full site assessment findings around the village, as set out in Appendix 3, **Green Belt land on Site 006 is considered a suitable housing site for allocation.**

Sites 006 (Land off Boscomoor Lane)

- 5.2.11 Site 006 was not proposed in the Council's 2021 Preferred Options consultation, lying in the Green Belt on Penkridge's southern edge rather than the Open Countryside to the north of the village. However, having reviewed the site assessment findings and considered representations received to the 2021 Preferred Options consultation, the Council considers the merits of Site 006 to be strong enough to warrant deviating from the previous spatial housing strategy. Specifically, the site is within walking distance (1.2km) of a nearby train station via direct, safe and well-lit footways, and also has good access to a nearby local centre. On top of this, its allocation would cause significantly less harm to the Green Belt than many other sites in broad locations identified for growth. There are also no outstanding constraints likely to significantly impact on the site's suitability (e.g. major negatives from the SA, highways concerns, areas of high habitat distinctiveness or significant heritage impacts).



5.3 Codsall and Bilbrook

- 5.3.1 The Council's preferred Spatial Housing Strategy, as set out in the Council's Local Plan Review – Publication Plan consultation, seeks to locate significant housing growth in Codsall/Bilbrook over the plan period 2018 to 2039. At a strategic level, this recognises the settlements' level of facilities and public transport links compared to other rural settlements in the District, the recommendations of the GBHMA Strategic Growth Study and the need to align growth to the delivery of a new first school and station car parking in this area.
- 5.3.2 Existing planning permissions, existing housing allocations without planning permission and dwellings completed after 1 April 2018 can deliver approximately 462 dwellings during the plan period. Key sites contributing towards this figure are set out in Table 3 below. Please note this table does not include all small planning permissions in and around this location, focusing on large sites only (10+ dwellings).

Table 3			
Site reference	Site address	Planning approval reference	Dwelling delivery 2018 - 2039
Existing planning permissions			
SAD Site 443	Land South of Pendeford Mill Lane	18/00710/FUL	168
SAD Site 223	Land West of Watery Lane	16/00495/REM	158*
SAD Site 406	Land off Keepers Lane, Codsall	21/00068/REM	65
CD/210	Former Gorsty Lea Garage	20/00299/FUL	15**
Allocated sites without planning permission			
SAD Site 228	Former Adult Training Centre off Histons Hill	n/a	29

*22 additional dwellings completed prior to 1st April 2018

**C2 scheme of 28 bedspaces converted into dwelling equivalent

- 5.3.3 Summary conclusions from the site assessment process for housing allocations are set out below. The Council has had regard to the relative merits of all sites in selecting its preferred sites, which are summarised in full in the proformas set out in Appendix 3. The conclusions set out below are only intended as a narrative summary of key points and should be read alongside the full site assessment pro-formas and the wider evidence base that has informed the Council's site selection.

Summary of proposed allocations in Codsall/Bilbrook

New development boundary sites and existing allocations being re-confirmed as suitable

- SAD Site 228 (Former Adult Training Centre off Histons Hill) – minimum delivery of approximately 29 dwellings, which is already accounted for in the existing commitments in this broad location

- Site 213 (Former Bilbrook House, Carter Avenue) – minimum delivery of approximately 13 dwellings

Allocations on existing safeguarded land

- Sites 419 a&b (land at Keepers Lane and Nine Acres Farm and land off Wergs Hall Road) – minimum delivery of approximately 317 dwellings

- Site 519 (Land East of Bilbrook) – minimum delivery of approximately 267 dwellings

New allocations Green Belt around Codsall/Bilbrook

- **Site 224 (Land adjacent 44 Station Rd)** – minimum delivery of approximately 85 dwellings
- **Site 519 (Land East of Bilbrook)** – minimum delivery of approximately 581 dwellings in addition to safeguarded land release on the site

- 5.3.4 To assist in explaining the Council's reasons for allocation narrative reasons for the selection of the sites are also summarised below. These should be read alongside the site assessment pro-formas in Appendix 3, which have been considered in full by the Council before reaching any decisions regarding new allocations.

Reasons for development boundary allocations

- 5.3.5 There is an existing allocated site (SAD Site 228 - Former Adult Training Centre off Histons Hill) within the villages' development boundary, which is proposed to be reallocated as the site assessment process has revealed no unsurmountable constraints which would affect the site. There is also an additional brownfield site option within Bilbrook's development boundary (Site 213) that has been assessed for potential allocation. As the site has now been demolished by Staffordshire County Council and confirmed as being surplus to requirements, it is considered that there is no existing use on the site which would prevent allocation of this otherwise highly sustainable brownfield site. There is another brownfield site option within Bilbrook's development boundary (Site 740) however this is not currently available for development and is therefore not deliverable or developable.

Reasons for safeguarded land (non-Green Belt) allocations

- 5.3.6 Codsall and Bilbrook contain existing safeguarded land sites outside of the Green Belt. These sites are non-Green Belt and need to be proactively explored for their potential to assist in meeting the District's proposed housing target. The sites assessment process has revealed no unmitigable constraints to the delivery of the safeguarded land sites in Codsall and Bilbrook, other than the distance of parts of Sites 419 a&b from local schools. However, as these sites are non-Green Belt and were considered suitable for safeguarding through the examination of the Site Allocations Document as recently as 2018, this is not considered to be a barrier to development in this instance, particularly as failure to allocate the sites could result in the need for further Green Belt release around these settlements.

Reasons for additional Green Belt allocations

- 5.3.7 The Council's site selection process has not revealed any additional deliverable non-Green Belt sites in this location beyond the existing safeguarded land sites. It is clear that additional Green Belt release will be required in this broad location to realise the Council's preferred Spatial Housing Strategy. Having regard to the full site assessment findings around the village, as set out in Appendix 3, **Green Belt land in Site 519 and Site 224 is considered the most appropriate option for delivering the Council's Spatial Housing Strategy.** Reasons for the selection of the sites are also summarised below.

Site 519 (Land East of Bilbrook)

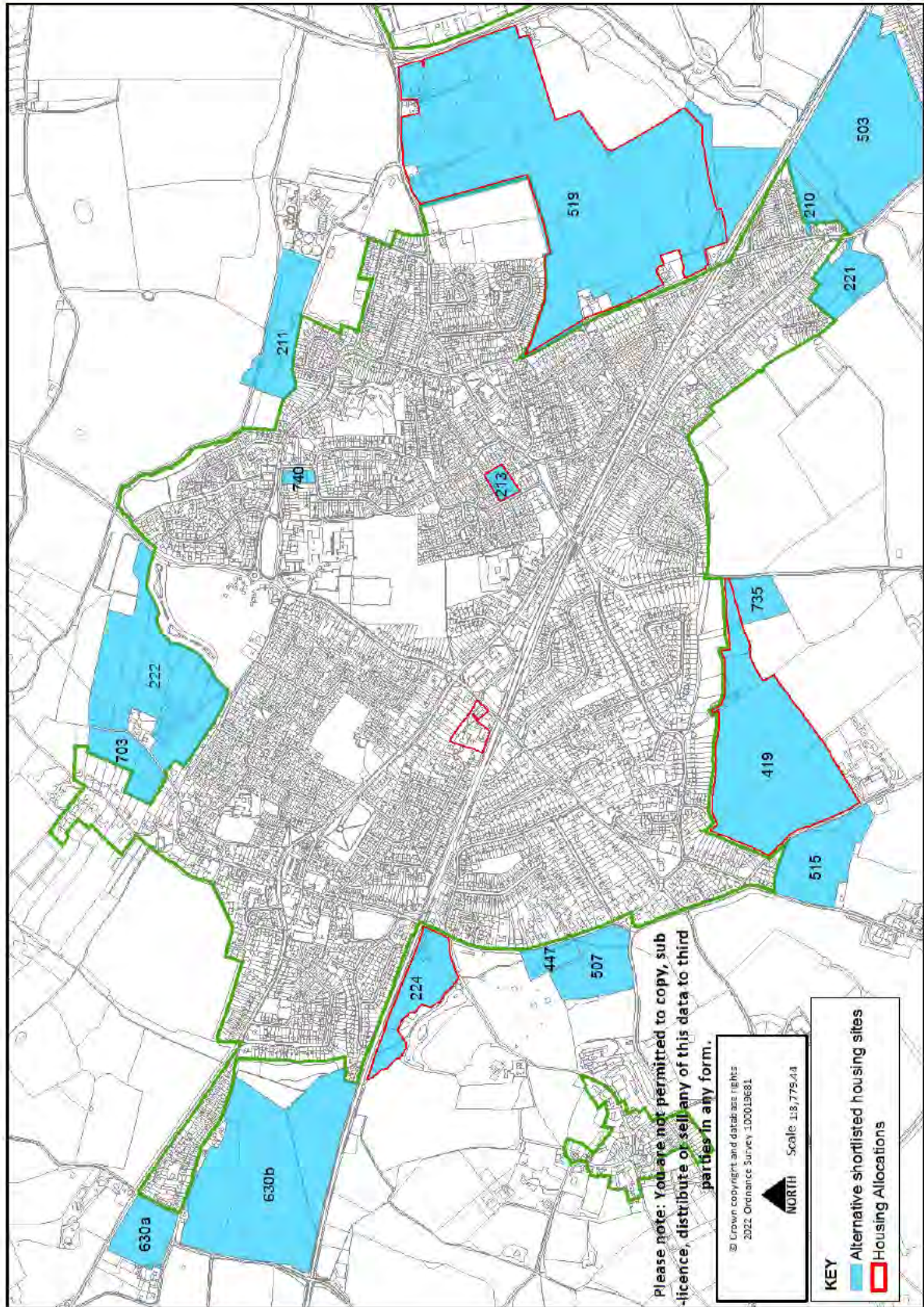
- 5.3.8 Site 519 is largely on land considered to be of high harm to the Green Belt, which is similar to much of the land in this broad location. Whilst there is an area of very high harm Green Belt and Flood Zones 2 and 3 to the south-west of the site, this is small in comparison to the overall site area and could easily be excluded from any allocated development. The site is

identified as being of moderate landscape sensitivity, with other sites around the settlements (particularly Codsall) being judged as more sensitive in landscape terms.

- 5.3.9 The site is large enough to provide most of the new dwellings required to deliver a new first school to serve the village, whilst being of sufficient size to ensure its delivery. There are other sizable Green Belt sites around the settlement that are slightly less harmful to the Green Belt (e.g. Site 222 and Site 630 a&b). However, both sites are in more sensitive landscape areas and don't present the same locational advantages present at Site 519. These include Site 519's unique location adjacent to active travel links to a nearby strategic employment site (i54) and the site's ability to deliver the required through road between Pendeford Mill Lane and Lane Green Road. Equally, correspondence with the education authority also suggests that any significant additional housing growth in the Codsall school cluster above the level implied by the Council's Spatial Housing Strategy will create unmitigable capacity issues at middle schools in the Codsall/Bilbrook area.

Site 224 (Land adjacent 44 Station Rd)

- 5.3.10 Site 224 is on land considered to be of moderate-high harm to the Green Belt, which is lower than most other Green Belt sites around the settlements. The site is in an area of high landscape sensitivity, which weighs against the site, as there are other sites of less landscape sensitivity in this broad location.
- 5.3.11 The site's allocation would offer numerous benefits that are not present at many other site suggestions. The site is the closest in the settlement to Codsall train station and is a very short distance from the village centre, offering walkable neighbourhood and public transport benefits. It is in a lower category of Green Belt harm around Codsall/Bilbrook (moderate-high) when compared with the majority of other land around the village. The site is also the best placed of all site options to deliver the car parking for Codsall station identified in the Infrastructure Delivery Plan, due to its proximity to the station.



5.4 Cheslyn Hay and Great Wyrley

- 5.4.1 The Council's preferred Spatial Housing Strategy, as set out in the Council's Local Plan Review – Publication Plan consultation, seeks to locate additional housing growth in Cheslyn Hay and Great Wyrley over the plan period 2018 to 2039, in addition to the existing allocated and safeguarded sites around the settlements. At a strategic level, this recognises the settlements' level of facilities and public transport links compared to other rural settlements in the District and the potential for additional allocations to be made to address the acute local need for specialist elderly housing in this location⁹. However, the level of growth in this area is a lesser amount than in other Tier 1 settlements, reflecting the lack of a recommendation for a strategic growth location in this area in the GBHMA Strategic Growth Study and the alternative options to locate growth to meet GBHMA unmet needs directly adjacent to the northern edge of the Black Country. Cheslyn Hay and Great Wyrley also lack the retail offer present in other Tier 1 settlements, failing to contain a Large Village Centre present in other Tier 1 locations. At a site-specific level, there are also a greater number of constraints affecting sites in this area, such as highways concerns regarding access or impacts on surrounding junctions, heritage impacts, brick clay safeguarding areas and highly distinctive habitats.
- 5.4.2 Existing planning permissions, existing housing allocations without planning permission and dwellings completed after 1 April 2018 can deliver approximately 236 dwellings during the plan period. Key sites contributing towards this figure are set out in Table 4 below. Please note this table does not include all small planning permissions in and around this location, focusing on large sites only (10+ dwellings).

Table 4			
Site reference	Site address	Planning approval reference	Dwelling delivery 2018 - 2039
Existing planning permissions			
SAD Site 119	Land at Saredon Road	19/00407/FUL	60
GW/165	Hazelbrook Industrial Estate, Hazel Lane	16/01023/REM	17
Allocated sites without planning permission			
SAD Site 141	Land at 154a Walsall Road	n/a	31
SAD Site 139	Land at Pool View, Churchbridge	n/a	46
SAD Site 136	Land at Landywood Lane	n/a	46

- 5.4.3 Summary conclusions from the site assessment process for housing allocations are set out below. The Council has had regard to the relative merits of all sites in selecting its preferred sites, which are summarised in full in the proformas set out in Appendix 3. The conclusions set out below are only intended as a narrative summary of key points and should be read alongside the full site assessment pro-formas and the wider evidence base that has informed the Council's site selection.

⁹ Specialist Housing: Local Need and Site Allocations Topic Paper 2021

Summary of proposed allocations in Cheslyn Hay/Great Wyrley

New development boundary sites and existing allocations being re-confirmed as suitable

- **SAD Site 141 (Land at 154a Walsall Road)** – minimum delivery of approximately 31 dwellings, which is already accounted for in the existing commitments in this broad location
- **SAD Site 139 (Land at Pool View, Churchbridge)** - minimum delivery of approximately 46 dwellings, which is already accounted for in the existing commitments in this broad location
- **SAD Site 136 (Land at Landywood Lane)** - minimum delivery of approximately 46 dwellings, which is already accounted for in the existing commitments in this broad location
- **Site 638 (Loades PLC)** – minimum delivery of approximately 29 dwellings

Allocations on existing safeguarded land

- **Sites 523 (Land off Wolverhampton Road)** – minimum delivery of approximately 50 dwellings
- **Site 119 (Land off Saredon Road)** – minimum delivery of approximately 49 dwellings
- **Site 136 (Land at Landywood Lane)** - minimum delivery of approximately 109 dwellings

New allocations Green Belt around Cheslyn Hay/Great Wyrley

- **Site 704 (Land off Norton Lane)** – minimum delivery of approximately 31 dwellings
- **Site 730 (Fishers Farm)** – minimum delivery of approximately 10 dwellings
- **Site 536a (Land off Holly Lane Part 1 – east of Chase Line railway)** – allocate part of wider site - minimum delivery of approximately 84 dwellings, with specialist sheltered, extra care or supported living delivered as part of this

- 5.4.4 To assist in explaining the Council’s reasons for allocation narrative reasons for the selection of the sites are also summarised below. These should be read alongside the site assessment pro-formas in Appendix 3, which have been considered in full by the Council before reaching any decisions regarding new allocations.

Reasons for development boundary allocations

- 5.4.5 There are multiple existing allocated sites within the villages’ development boundary (SAD Site 141, SAD Site 139 and SAD Site 136). These are proposed to be reallocated as the site assessment process has revealed no unsurmountable constraints which would affect the sites in question. There are also some additional brownfield site options within Great Wyrley’s development boundary (Sites 491, 638 & 741) that have been assessed for potential allocation.
- 5.4.6 Site 741 is within the development boundary but is in active use as a car park and would raise highways concerns if allocated for development. Site 491 is in an active employment use and may not have an achievable access solution for a residential use, meaning it is not proposed for a housing allocation, despite its location within the development boundary. Site 638 is also in an active employment use, but has been vacant for some time and (unlike Site 491) has no access issues and has recently completed a marketing exercise showing the site is no longer viable for employment use. This site therefore provides an additional opportunity to deliver housing growth in the area on previously developed land outside of the Green Belt. As the site has no other constraints likely to prevent development it has been proposed for allocation for housing.

Reasons for safeguarded land (non-Green Belt) allocations

- 5.4.7 Cheslyn Hay and Great Wyrley contain existing safeguarded land sites outside of the Green Belt. These sites are non-Green Belt and need to be proactively explored for their potential to assist in meeting the District's proposed housing target. Sites 523 and 119a are within a mineral safeguarding area for brick clay and Site 136 is within an area of high habitat distinctiveness. However, as these sites are non-Green Belt and were considered suitable for safeguarding through the examination of the Site Allocations Document as recently as 2018, these constraints are not considered to be a barrier to development in this instance, particularly as failure to allocate the sites could result in the need for further Green Belt release around these settlements.

Reasons for additional Green Belt allocations

- 5.4.8 The Council's site selection process has not revealed any additional deliverable non-Green Belt sites in this location beyond the existing safeguarded land sites and a single potentially deliverable development boundary site (Site 638). Additional Green Belt release will therefore be required in this broad location to realise the Council's preferred Spatial Housing Strategy. Having regard to the full site assessment findings around the village, as set out in Appendix 3, **Green Belt land release on Sites 536a, 705 & 730 is considered the most appropriate option for delivering the Council's Spatial Housing Strategy**. Reasons for the selection of the sites are also summarised below.

Site 536a (Land off Holly Lane Part 1 – east of Chase Line railway)

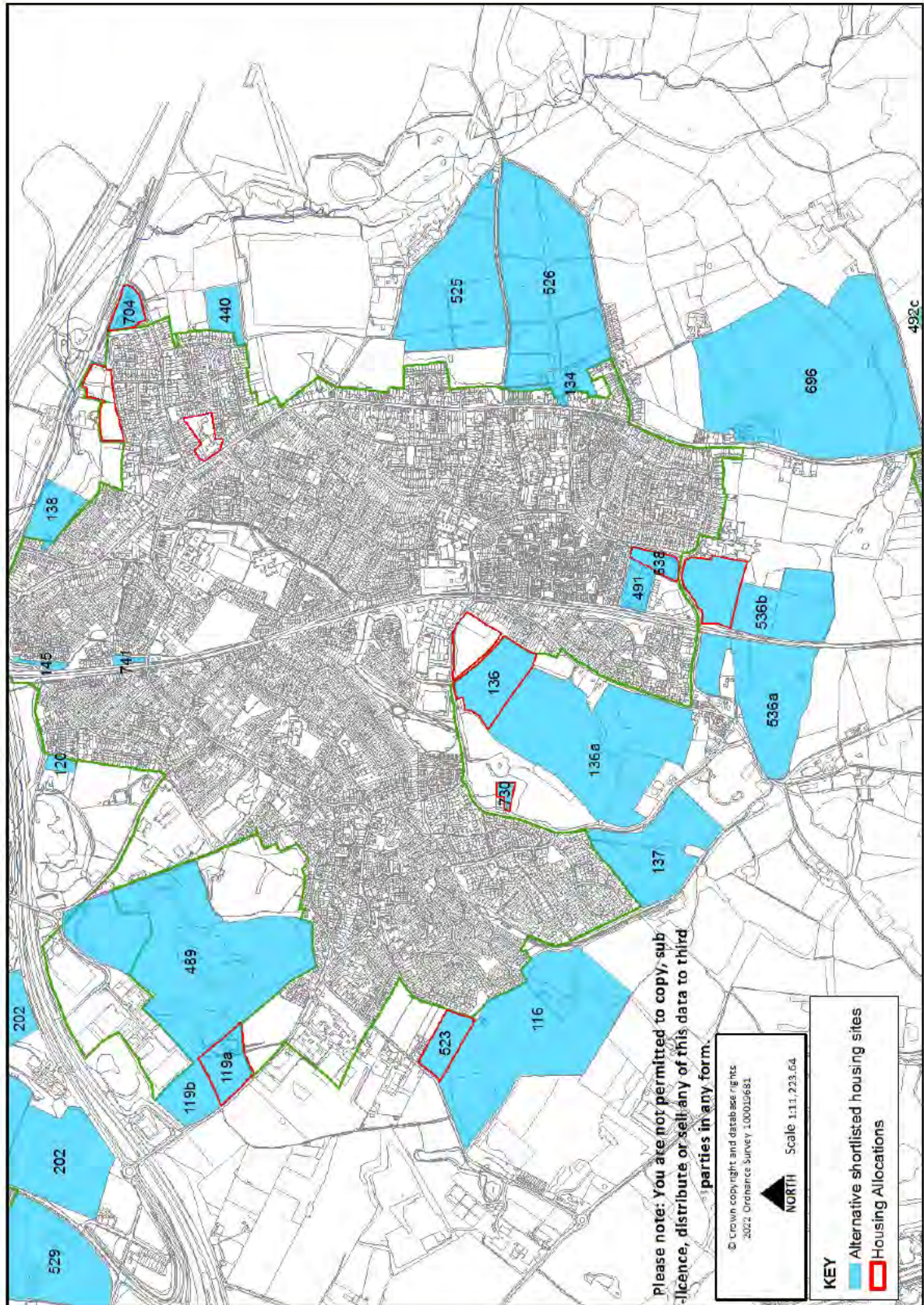
- 5.4.9 3.95ha of land at the northern end of the site is on land considered to be of high harm to the Green Belt, which is similar to much of the larger land parcels in this broad location, and is also of a similar landscape sensitivity to other parcels around the village. Unlike other potential Green Belt sites around the settlements, the site is free from significant constraints (e.g. highly distinctive habitats, Highways Authority concerns, potential significant heritage impacts, loss of employment uses, constrained site layouts and brick clay safeguarding areas). A more limited development on this part of the site may be able to provide additional parking needed for the adjacent school whilst avoiding Highways Authority concerns that overdevelopment of the site may raise regarding surrounding junctions. Limiting the allocation to 3.95ha of land would also allow the area of 'very high' harm Green Belt to the south of the site to be avoided, reducing the allocation's impact on the Green Belt. The sites proximity to local shops and public transport means it may also be a suitable opportunity to address the acute local need for specialist elderly housing in Cheslyn Hay/Great Wyrley.

Site 704 (Land off Norton Lane)

- 5.4.10 Site 704 is in an area of lower Green Belt harm than the majority of land around the settlements, sitting in an area of 'low' Green Belt harm. The site's release is also assessed as having major positive impacts against education, due to the site's proximity to local schools. Unlike the majority of Green Belt land around the settlements, the site is also previously developed land (which the NPPF indicates should be examined as a priority if Green Belt release is considered) and does not have any significant constraints that would hinder its allocation for housing. Like Site 536a, the site is also free from the constraints affecting other Green Belt site options around the settlements, as set out in the previous paragraph.

Site 730 (Fishers Farm)

- 5.4.11 Site 730 is in an area of lower Green Belt harm than the majority of land around the settlements, sitting in an area of 'moderate' harm. The site's release is also assessed as having major positive impacts against education, due to the site's proximity to local schools. Unlike the majority of Green Belt land around the settlements, the site is also previously developed land (which the NPPF indicates should be examined as a priority if Green Belt release is considered) and does not have any significant constraints that would hinder its allocation for housing. The site is also free from the constraints affecting other Green Belt site options around Cheslyn Hay and Great Wyrley.



5.5 Wombourne

- 5.5.1 The Council's preferred Spatial Housing Strategy, as set out in the Council's Local Plan Review – Publication Plan consultation, seeks to locate additional housing growth in Wombourne over the plan period 2018 to 2039, in addition to the existing safeguarded land sites around the village. This strategy sought to locate any additional necessary Green Belt release on previously developed land around the village where possible, subject to the outcomes of the site assessment process. At a strategic level, this approach recognised the settlements' level of facilities and public transport links compared to other rural settlements in the District, with Wombourne being the District's largest tier 2 settlement. Unlike all other Tier 2 settlements, Wombourne also carries one of the District's three Large Village Centres, reflecting its wider retail offer. The priority given to brownfield land around the village recognises need to give first consideration to previously developed land and that there are poorer quality employment sites adjacent to the village put forward through the call for sites process that may become available for development during the plan period.
- 5.5.2 Existing planning permissions, existing housing allocations without planning permission and dwellings completed after 1 April 2018 can deliver approximately 300 dwellings during the plan period. Key sites contributing towards this figure are set out in Table 5 below. Please note this table does not include all small planning permissions in and around this location, focusing on large sites only (10+ dwellings).

Table 5			
Site reference	Site address	Planning approval reference	Dwelling delivery 2018 - 2039
Existing planning permissions			
SAD Site 281a	Land off Giggetty Lane	18/00831/FUL	32
SAD Site 302	Land at Beggars Bush Lane	19/00212/REM	90
SAD Site 283	Land north of Bridgnorth Road	18/00802/FUL	102
WM/249	Land off Ounsdale Road	18/00432/FUL	34

- 5.5.3 Summary conclusions from the site assessment process for housing allocations are set out below. The Council has had regard to the relative merits of all sites in selecting its preferred sites, which are summarised in full in the proformas set out in Appendix 3. The conclusions set out below are only intended as a narrative summary of key points and should be read alongside the full site assessment pro-formas and the wider evidence base that has informed the Council's site selection.

Summary of proposed allocations in Wombourne

New development boundary sites and existing allocations being re-confirmed as suitable
- None

Allocations on existing safeguarded land

- Sites 285, 562/415 & 459 (Land off Poolhouse Road) – minimum delivery of approximately 223 dwellings

- Site 416 (land off Orton Lane) – minimum delivery of approximately 57 dwellings

New allocations Green Belt around Wombourne

- **Sites 463b,c&d and 284 (Land off Billy Buns Lane, Smallbrook Lane and Gilbert Lane)** – minimum delivery of approximately 223 dwellings
- **Site 416a (Land off Orton Lane)** – minimum delivery of approximately 22 dwellings

- 5.5.4 To assist in explaining the Council's reasons for allocation narrative reasons for the selection of the sites are also summarised below. These should be read alongside the site assessment pro-formas in Appendix 3, which have been considered in full by the Council before reaching any decisions regarding new allocations.

Reasons for development boundary allocations

- 5.5.5 There are significant existing planning permissions within the development boundary of the village, primarily on existing sites recently allocated through the Site Allocations Document 2018. However, outside of existing planning permissions, the site assessment process has not revealed any large (10+ dwelling) deliverable sites within the development boundary. Site 738 (Wagon and Horses public house) was assessed for potential housing allocation but would have resulted in the loss of an essential community facility, rendering the site unsuitable. Therefore, no development boundary locations are proposed for new housing allocations.

Reasons for safeguarded land (non-Green Belt) allocations

- 5.5.6 Wombourne contains existing safeguarded land sites outside of the Green Belt. These sites are non-Green Belt and need to be proactively explored for their potential to assist in meeting the District's proposed housing target. The sites assessment process has revealed no unmitigable constraints to the delivery of the safeguarded land in Wombourne. Given this, and the sites being considered suitable for safeguarding through the examination of the Site Allocations Document as recently as 2018, Sites 285, 562/415 & 459 and Site 416 are considered suitable for housing allocation.

Reasons for additional Green Belt allocations

- 5.5.7 The Council's site selection process has not revealed any additional deliverable non-Green Belt sites in this location beyond the existing safeguarded land sites. Additional Green Belt release will therefore be required in this broad location to realise the Council's preferred Spatial Housing Strategy. Having regard to the full site assessment findings around the village, as set out in Appendix 3, **Green Belt land release on Sites 463b,c&d and 284 and Site 416a is considered the most appropriate option for delivering the Council's Spatial Housing Strategy.** Reasons for the selection of the sites are also summarised below.

Site 416a (Land off Orton Lane)

- 5.5.8 Site 416a is an area of greater landscape sensitivity than the majority of land around Wombourne, sitting in an area of 'moderate-high' sensitivity. The site is also in an area of similar Green Belt harm than the majority of land around Wombourne, sitting in an area of 'moderate-high' harm. However, the site is free from any significant constraints and is adjacent to an area of safeguarded land proposed for a housing allocation (Site 416). Its allocation would facilitate delivery of that site by providing access to the northern parcel of

the safeguarded site and creating a more regular site shape when considered with the wider parcel.

Sites 463b,c&d and 284 (Land off Billy Buns Lane, Smallbrook Lane and Gilbert Lane)

- 5.5.9 Sites 463b,c&d and 284 are in an area of greater landscape sensitivity than the majority of land around Wombourne, sitting in 'moderate-high' sensitivity land. Despite this, the site is in an area of lower Green Belt harm than the majority of land around the village, sitting in an area of 'low-moderate' harm. This means it is of similar Green Belt harm to brownfield site options around the village (e.g. Sites 310a&b). The site's release is also assessed as having major positive impacts against education, due to the site's proximity to local schools. The site is also in significantly closer proximity to the village's centre than other sites around the village and sits in close proximity to one of the District's most frequent bus routes into the Black Country.
- 5.5.10 In contrast, many other sites in this broad location have initial concerns raised from the Highways Authority, unmitigable major adverse effects in the SA, or areas of both 'Very High' harm Green Belt and 'Moderate-High' sensitivity landscape. Numerous other sites also fail to score a major positive impact in the Sustainability Appraisal, unlike the proposed sites and are in areas of higher Green Belt harm than the proposed allocation. Whilst there are some limited areas of Green Belt land that are free from such constraints (e.g. Site 708), these are relatively remote from the village centre compared to Sites 463 b,c, d and 284 and are not predicted to have the major positive impacts on education that those sites will have.
- 5.5.11 The majority of alternative sites around the village are on greenfield land. However, there is one significant area of previously developed land in the Green Belt to the south-west of the village, on Sites 310a and 310b. Both are on existing employment sites of 'other' quality in the Council's Economic Development Needs Assessment. Site 310b's occupiers have not indicated an intention to relocate their businesses, so allocating the land for housing may result in a loss of employment units without any likely substitute in the District or surrounding area. In contrast, the occupier of Site 310a has put their land interests forward through the call for sites process. Whilst initial work has been undertaken to address the potential highways concerns raised by establishing a residential access to the site, it has become apparent that the site's occupiers (Copart) are not currently intending to relocate to a site within South Staffordshire's administrative boundary. This risks creating a shortfall against the Council's employment land target, rendering the site unsuitable. Given the above, these sites are not considered to be a more appropriate option for accommodating housing growth than Sites 463b,c&d and 284. Whilst Sites 463b,c&d and 284 are not previously developed land in the Green Belt, they are of similarly low Green Belt harm as the large area of previously developed land in the south-west of the village (Sites 310a&b), so given this and their sustainable location near to services and facilities, they are considered the best available option to deliver growth in Wombourne.

5.6 Brewood

- 5.6.1 The Council's preferred Spatial Housing Strategy, as set out in the Council's Local Plan Review – Publication Plan consultation, seeks to locate a limited level of additional housing growth in Brewood over the plan period 2018 to 2039, in addition to the existing allocated and safeguarded sites around the village. At a strategic level, allocating additional growth in this location recognises the village's level of facilities and public transport links, as reflected in its status as a Tier 2 village, and the potential for additional allocations to be made to address the acute local need for specialist elderly housing in this location¹⁰. Balanced against this is the village's identification as one of the District's 'historic towns' in the Historic Environment Character Assessment. At a site-specific level there is also a lack of any significant land parcels that are outside of areas of high landscape sensitivity, without major negative adverse effects predicted in the Sustainability Appraisal or without initial concerns from the Highways Authority.
- 5.6.2 Existing planning permissions, existing housing allocations without planning permission and dwellings completed after 1 April 2018 can deliver approximately 77 dwellings during the plan period. Key sites contributing towards this figure are set out in Table 6 below. Please note this table does not include all small planning permissions in and around this location, focusing on large sites only (10+ dwellings).

Table 6			
Site reference	Site address	Planning approval reference	Dwelling delivery 2018 - 2039
Existing planning permissions			
SAD Site 054	Land at Engleton Lane	18/00991/FUL	73

- 5.6.3 Summary conclusions from the site assessment process for housing allocations are set out below. The Council has had regard to the relative merits of all sites in selecting its preferred sites, which are summarised in full in the proformas set out in Appendix 3. The conclusions set out below are only intended as a narrative summary of key points and should be read alongside the full site assessment pro-formas and the wider evidence base that has informed the Council's site selection.

Summary of proposed allocations in Brewood

New development boundary sites and existing allocations being re-confirmed as suitable
- None

Allocations on existing safeguarded land
- Sites 617 (Land off Four Ashes Road) – minimum delivery of approximately 63 dwellings

New allocations Green Belt around Brewood
- Site 079 (land south Kiddemore Green Road) – minimum delivery of approximately 43 dwellings, with specialist elderly retirement living delivered as part of this

- 5.6.4 To assist in explaining the Council's reasons for allocation, reasons for the selection of the sites are also summarised below. These should be read alongside the site assessment pro-

¹⁰ Specialist Housing: Local Need and Site Allocations Topic Paper 2021

formas in Appendix 3, which have been considered in full by the Council before reaching any decisions regarding new allocations.

Reasons for development boundary allocations

- 5.6.5 There is an existing major planning permission within the development boundary of the village on the previously allocated housing site at Engleton Lane. However, outside of that existing planning permission, no further large site suggestions with capacity to accommodate residential growth have been identified within the development boundary. Whilst Site 057 sits within the development boundary, this is a historic site suggestion on an existing residential site, the redevelopment of which is unlikely to deliver residential growth or affordable housing provision unless delivered at an inappropriate density. Therefore, no development boundary locations are proposed for new housing allocations.

Reasons for safeguarded land (non-Green Belt) allocations

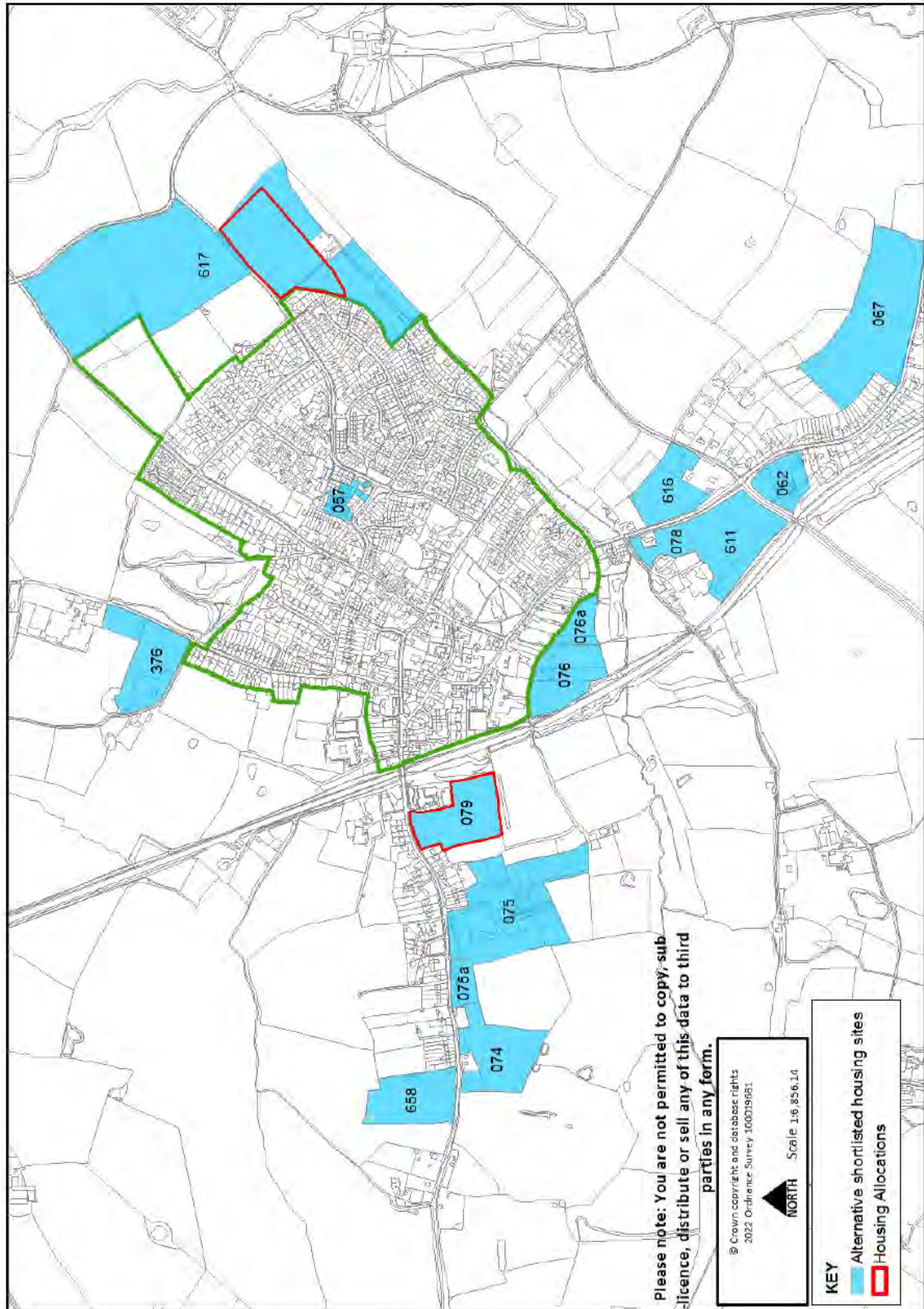
- 5.6.6 Brewood contains an existing safeguarded land site (part of Site 617). This site is non-Green Belt and needs to be proactively explored for its potential to assist in meeting the District's proposed housing target. The site assessment process has revealed no unmitigable constraints to the delivery of the safeguarded land element of Site 617, other than the distance of parts of the site from local schools. However, this element of the wider site is non-Green Belt and was considered suitable for safeguarding through the examination of the Site Allocations Document as recently as 2018 and is the closest area of the wider land parcel to the adjacent village. Therefore, this is not considered to be a barrier to development in this instance, particularly as failure to allocate the sites could result in the need for further Green Belt release around these settlements.

Reasons for additional Green Belt allocations

- 5.6.7 The Council's site selection process has not revealed any additional deliverable non-Green Belt sites in this location beyond the existing safeguarded land site. Additional Green Belt release will therefore be required in this broad location to realise the Council's preferred Spatial Housing Strategy. Having regard to the full site assessment findings around the village, as set out in Appendix 3, **Green Belt land release on Site 079 is considered the most appropriate option for delivering the Council's Spatial Housing Strategy**. Reasons for the selection of the sites are also summarised below.

Site 079 (land south Kiddemore Green Road)

- 5.6.8 Unlike some of the other potential Green Belt sites around the village, the site is free from significant constraints (e.g. Highways Authority concerns & non-Green Belt/landscape sensitivity-related major negative effects in the Sustainability Appraisal). The site is of a similar landscape sensitivity to most other land around the village, but is of lesser Green Belt harm than other sites and also lies in closer proximity to the village's centre. Allocation of the full site would also deliver growth that is of a scale that reflects the Council's preferred spatial housing strategy and offers an opportunity for specialist elderly retirement living in a location close to the village centre and local health facilities.



5.7 Kinver

- 5.7.1 The Council's preferred Spatial Housing Strategy, as set out in the Council's Local Plan Review – Publication Plan consultation, seeks to locate a limited level of additional housing growth in Kinver over the plan period 2018 to 2039. Previously the 2019 SHSID consultation and 2021 Preferred Options consultation sought to deliver new small site allocations (<1 hectare) in addition to the existing allocated and safeguarded sites around the village. At a strategic level, allocating additional growth in this location recognises the village's level of facilities and public transport links, as reflected in its status as a Tier 2 village and the potential for additional allocations to be made to address the acute local need for specialist elderly housing in this location¹¹. This is balanced against the village's identification as one of the District's 'historic towns' in the Historic Environment Character Assessment. At a site-specific level there is also a lack of any significant land parcels that are outside of areas of high landscape sensitivity, without significant heritage concerns raised in the Historic Environment Site Assessment or without initial concerns from the Highways Authority.
- 5.7.2 Existing planning permissions, existing housing allocations without planning permission and dwellings completed after 1 April 2018 can deliver approximately 136 dwellings during the plan period. Key sites contributing towards this figure are set out in Table 7 below. Please note this table does not include all small planning permissions in and around this location, focusing on large sites only (10+ dwellings).

Table 7			
Site reference	Site address	Planning approval reference	Dwelling delivery 2018 - 2039
Existing planning permissions			
KV/348	Grey House, Dark Lane	16/00985/FUL	10
KV/361	Land at the Burgesses, High Street	18/00322/FUL	11*
SAD Site 270	Land east of Hyde Lane	19/00444/REM	45
Allocated sites without planning permission			
SAD Site 274**	Land at White Hill	20/00621/OUT	38

* net total, 20 gross dwellings proposed on site containing 9 existing dwellings

** the site had resolution to grant approval for up to 38 dwellings as of 1st April 2021 but had not yet completed a s106 to allow permission to be formally granted

- 5.7.3 Summary conclusions from the site assessment process for housing allocations are set out below. The Council has had regard to the relative merits of all sites in selecting its preferred sites, which are summarised in full in the proformas set out in Appendix 3. The conclusions set out below are only intended as a narrative summary of key points and should be read alongside the full site assessment pro-formas and the wider evidence base that has informed the Council's site selection.

Summary of proposed allocations in Kinver

New development boundary sites and existing allocations being re-confirmed as suitable - SAD Site 274 (Land at White Hill) – minimum delivery of approximately 38 dwellings, which is already accounted for in the existing commitments in this broad location

¹¹ Specialist Housing: Local Need and Site Allocations Topic Paper 2022

Allocations on existing safeguarded land

- **Site 274 (Land south of White Hill)** – minimum delivery of approximately 82 dwellings

New allocations in Green Belt around Kinver

- **Site 576 (land off Hyde Lane (west))** – minimum delivery of approximately 44 dwellings

- 5.7.4 To assist in explaining the Council's reasons for allocation narrative reasons for the selection of the sites are also summarised below. These should be read alongside the site assessment pro-formas in Appendix 3, which have been considered in full by the Council before reaching any decisions regarding new allocations. In considering sites, regard has been had to the Specialist Housing Topic Paper 2022, which identifies a potential opportunity to explore a small extra care/supported living scheme in the village if a suitable site could be identified. However, following the site selection process, none of the best performing site options were considered to be close enough to public transport, local amenities, health care or the village centre to warrant a specialist elderly housing allocation. Given these points and the comparatively small need for such accommodation in the village (when compared with Great Wyrley and Brewood), a specific specialist elderly housing allocation has not been proposed.

Reasons for development boundary allocations

- 5.7.5 There are multiple existing major planning permissions within the development boundary of the village, including one on the previously allocated housing site at Hyde Lane (SAD Site 270). In addition, there is a scheme with a current resolution to grant permission on an existing allocated site (SAD Site 274), which is proposed for reallocation as (as at 1st April 2021) it had not yet formally achieved permission due to the need to finalise the section 106 agreement to deliver the site. Outside of these sites, no further large site suggestions with capacity to accommodate residential growth have been identified within the development boundary.

Reasons for safeguarded land (non-Green Belt) allocations

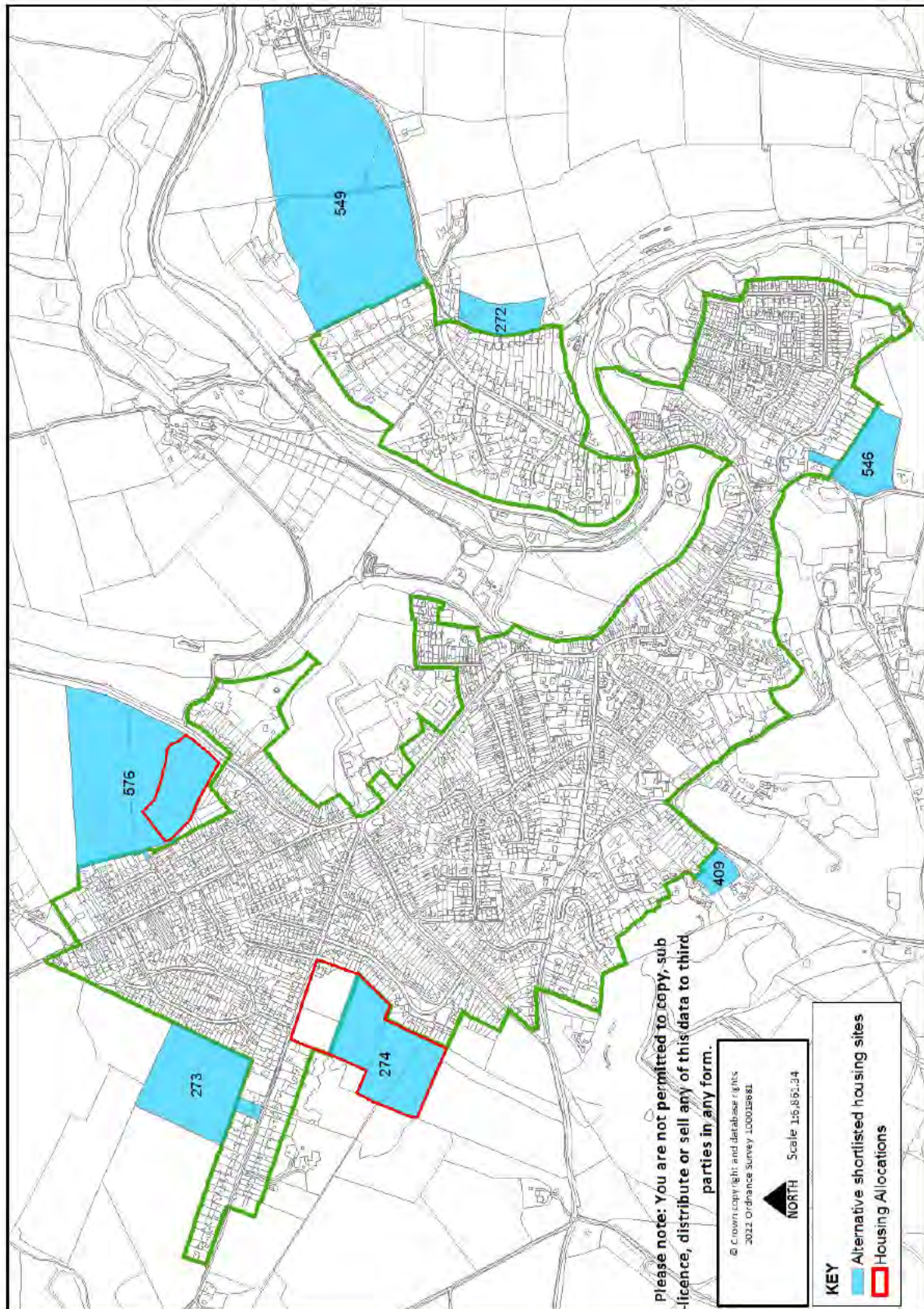
- 5.7.6 Kinver contains an existing safeguarded land site (Site 274). This site is non-Green Belt and needs to be proactively explored for its potential to assist in meeting the District's proposed housing target. The site assessment process has revealed no unmitigable constraints to the delivery of the safeguarded land on Site 274 and this site was considered suitable for safeguarding through the examination of the Site Allocations Document as recently as 2018. Therefore, this site is proposed for allocation.

Reasons for additional Green Belt allocations

- 5.7.7 The Council's site selection process has not revealed any additional deliverable non-Green Belt sites in this location beyond the existing safeguarded land site. Additional Green Belt release will therefore be required in this broad location to realise the Council's preferred Spatial Housing Strategy. Having regard to the full site assessment findings around the village, as set out in Appendix 3, **Green Belt land release to deliver growth on Site 576 is considered the most appropriate option for delivering the Council's Spatial Housing Strategy**. Reasons for the selection of the sites are also summarised below.

Site 576 (Land off Hyde Lane (west))

- 5.7.8 Unlike some of the other potential Green Belt sites around the village, the site is free from significant constraints (e.g. Highways Authority concerns). The site is of a similar landscape sensitivity to most other land around the village, but is of lesser Green Belt harm than other sites in this area. The proposed allocation has been increased to around 2ha since the 2021 Preferred Options consultation. This is due to the removal of Site 272 as a proposed allocation. This allocation was removed to reflect the findings of the updated Historic Environment Site Assessment, which identified unmitigable significant effects on the historic environment were the site to be allocated.
- 5.7.9 Whilst the initial strategy for the village was to limit allocations to sites of up to 1ha, revised monitoring suggests that the Council can achieve its small sites duty using existing allocations and commitments, without requiring the need for additional allocations of less than 1ha. As the most appropriate site option around the village, Site 576 has been reallocated the remaining level of growth allocated to Kinver in the Spatial Housing Strategy, doubling the original size of the site proposed in the 2021 Preferred Options consultation.



5.8 Perton

- 5.8.1 The Council's preferred Spatial Housing Strategy, as set out in the Council's Local Plan Review – Publication Plan consultation, does not seek to allocate additional housing growth in Perton over the plan period 2018 to 2039, other than the existing safeguarded land adjacent to the village. This differs from the strategy set out for the village in the 2019 Spatial Housing Strategy and Infrastructure Delivery consultation, which sought to allocate significant additional growth beyond the existing safeguarded land around the village. This recognised the level of services and facilities available in the village (which is a Tier 2 settlement) and the opportunities for large land parcels adjacent the village to deliver both housing growth and significant green infrastructure for Green Belt compensatory measures. However, following the site assessment process, constraints have been revealed on sites adjacent to the village which suggest that this may no longer be an appropriate strategy, which are summarised in the relevant section below.
- 5.8.2 Existing planning permissions, existing housing allocations without planning permission and dwellings completed after 1 April 2018 can deliver approximately 226 dwellings during the plan period. Key sites contributing towards this figure are set out in Table 8 below. Please note this table does not include all small planning permissions in and around this location, focusing on large sites only (10+ dwellings).

Table 8			
Site reference	Site address	Planning approval reference	Dwelling delivery 2018 - 2039
Existing planning permissions			
SAD Site 239	Land off Wrottesley Park Road	18/00436/OUT	220

- 5.8.3 Summary conclusions from the site assessment process for housing allocations are set out below. The Council has had regard to the relative merits of all sites in selecting its preferred sites, which are summarised in full in the proformas set out in Appendix 3. The conclusions set out below are only intended as a narrative summary of key points and should be read alongside the full site assessment pro-formas and the wider evidence base that has informed the Council's site selection.

Summary of proposed allocations in Perton

New development boundary sites and existing allocations being re-confirmed as suitable
- none

Allocations on existing safeguarded land

- Site 239 (Land west of Wrottesley Park Road) – minimum delivery of approximately 150 dwellings

New allocations in Green Belt around Perton

- none

- 5.8.4 To assist in explaining the Council's reasons for allocation summary narrative reasons for the selection of the sites are also summarised below. These should be read alongside the site assessment pro-formas in Appendix 3, which have been considered in full by the Council before reaching any decisions regarding new allocations.

Reasons for development boundary allocations

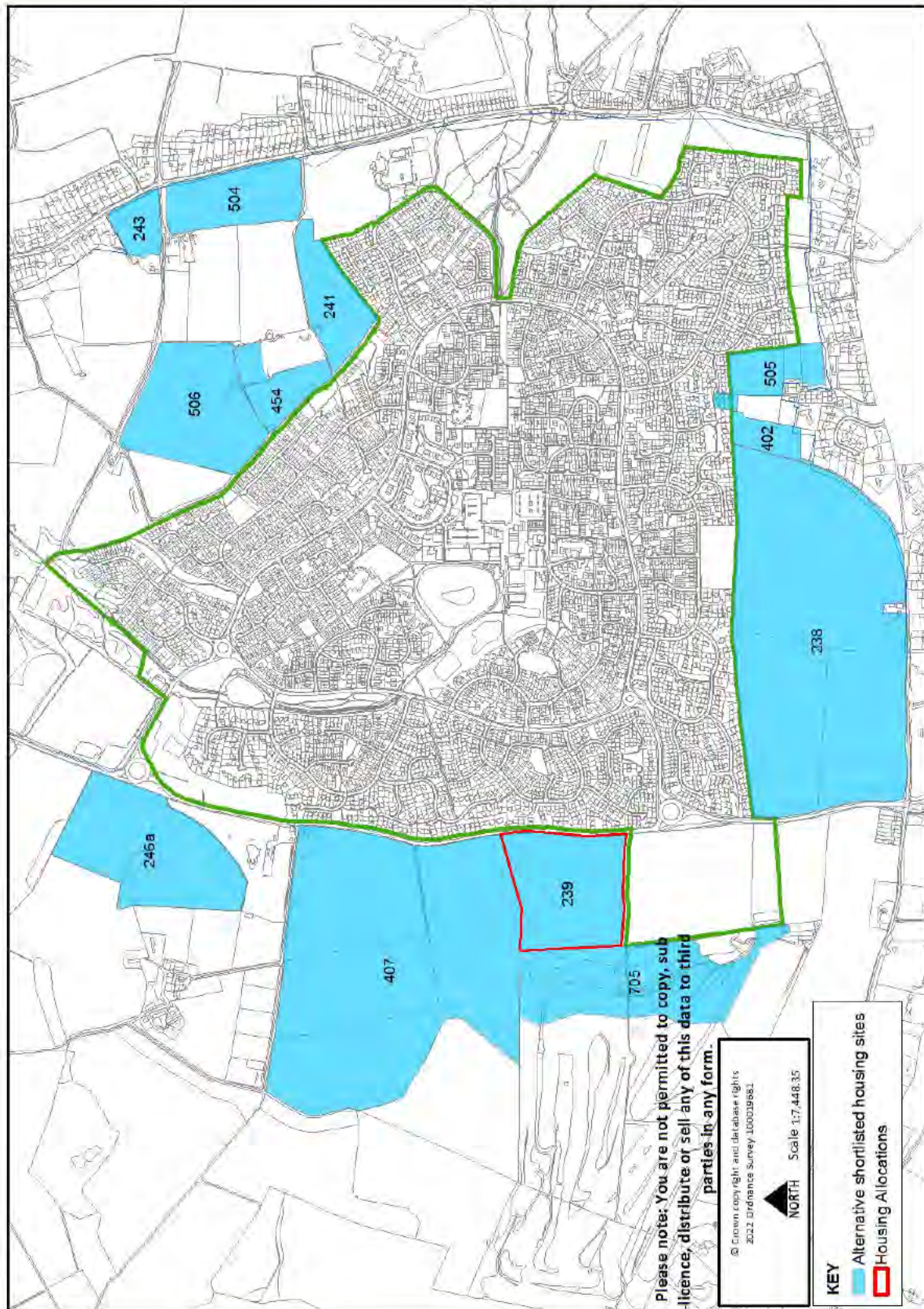
- 5.8.5 There is an existing major planning permission within the development boundary of the village on the previously allocated housing site west of Wrottesley Park Road. However, outside of that existing planning permission, no further large site suggestions with capacity to accommodate residential growth have been identified within the development boundary. Therefore, no development boundary locations are proposed for new housing allocations.

Reasons for safeguarded land (non-Green Belt) allocations

- 5.8.6 Perton contains an existing safeguarded land site (Site 239). This site is non-Green Belt and needs to be proactively explored for its potential to assist in meeting the District's proposed housing target. The site assessment process has revealed no unmitigable constraints to the site's delivery, other than the major negative effects predicted in the Sustainability Appraisal due to the distance of the site from local schools. However, as this land has already been removed from the Green Belt and was considered suitable for safeguarding through the examination of the Site Allocations Document as recently as 2018, this is not considered to be a barrier to development in this instance, particularly as failure to allocate the sites could result in the need for further Green Belt release elsewhere in the District..

Reasons for lack of additional Green Belt allocations

- 5.8.7 The 2019 Spatial Housing Strategy & Infrastructure Delivery (SHSID) consultation indicating significant additional growth may be delivered on top of the existing safeguarded land site. However, following the site assessment process the Council has revisited this strategic approach to reflect the constraints and issues affecting additional land release options around the village. All Green Belt land release options around the village raise initial concerns from the Highways authority. On the eastern side of the village these largely centre around the lack of a suitable achievable access to the sites, whereas on the western side this centres around concerns around the impacts on surrounding junctions, specifically the A41/Wrottesley Park Road junction. Some site promoters have worked with the Highways Authority to establish a mitigation scheme for this junction, which (where appropriate) has been reflected in updated highways authority comments for each site option.
- 5.8.8 In addition to the highways constraints affecting Green Belt sites around the village, there are other constraints affecting site options that have warranted a departure from the strategy set out in the SHSID. The larger Green Belt parcels on the western and southern sides of the village are all affected by major negative constraints in the Sustainability Appraisal due to their remote location in relation to local schools and in one instance (Site 246a) are in land that is both Very High Green Belt harm and Moderate/High landscape sensitivity. Given the extent of constraints affecting the sites in this broad location and the significant housing growth already proposed in Perton over the plan period, the Spatial Housing Strategy for the District has been revised to limit land release adjacent to Perton to the existing safeguarded land proposal.



5.9 Huntington

- 5.9.1 The Council's preferred Spatial Housing Strategy, as set out in the 2019 Spatial Housing Strategy and Infrastructure Delivery (SHSID) consultation and 2021 Preferred Options consultation, previously sought to locate a limited level of additional housing growth in Huntington over the plan period to deliver new small site allocations (<1 hectare) in addition to the existing safeguarded land around the village. At a strategic level, this level of growth recognised the village's level of facilities and public transport links, as reflected in its status as a Tier 2 village, whilst balancing the extent to which the village is constrained by proximity to the Cannock Chase AONB.
- 5.9.2 Existing planning permissions and dwellings completed after 1 April 2018 can deliver approximately 9 dwellings during the plan period. All sites contributing to this figure are minor sites (i.e. 1-9 dwellings).
- 5.9.3 Summary conclusions from the site assessment process for housing allocations are set out below. The Council has had regard to the relative merits of all sites in selecting its preferred sites, which are summarised in full in the proformas set out in Appendix 3. The conclusions set out below are only intended as a narrative summary of key points and should be read alongside the full site assessment pro-formas and the wider evidence base that has informed the Council's site selection.

Summary of proposed allocations in Huntington

New development boundary sites and existing allocations being re-confirmed as suitable

- None

Allocations on existing safeguarded land

- Sites 016 (Land at Pear Tree Farm) – minimum delivery of approximately 39 dwellings

New allocations Green Belt around Huntington

- None

- 5.9.4 To assist in explaining the Council's reasons for allocation summary narrative reasons for the selection of the sites are also summarised below. These should be read alongside the site assessment pro-formas in Appendix 3, which have been considered in full by the Council before reaching any decisions regarding new allocations.

Reasons for development boundary allocations

- 5.9.5 The site assessment process has not revealed any large site suggestions with capacity to accommodate residential growth within the development boundary. Therefore, no development boundary locations are proposed for new housing allocations.

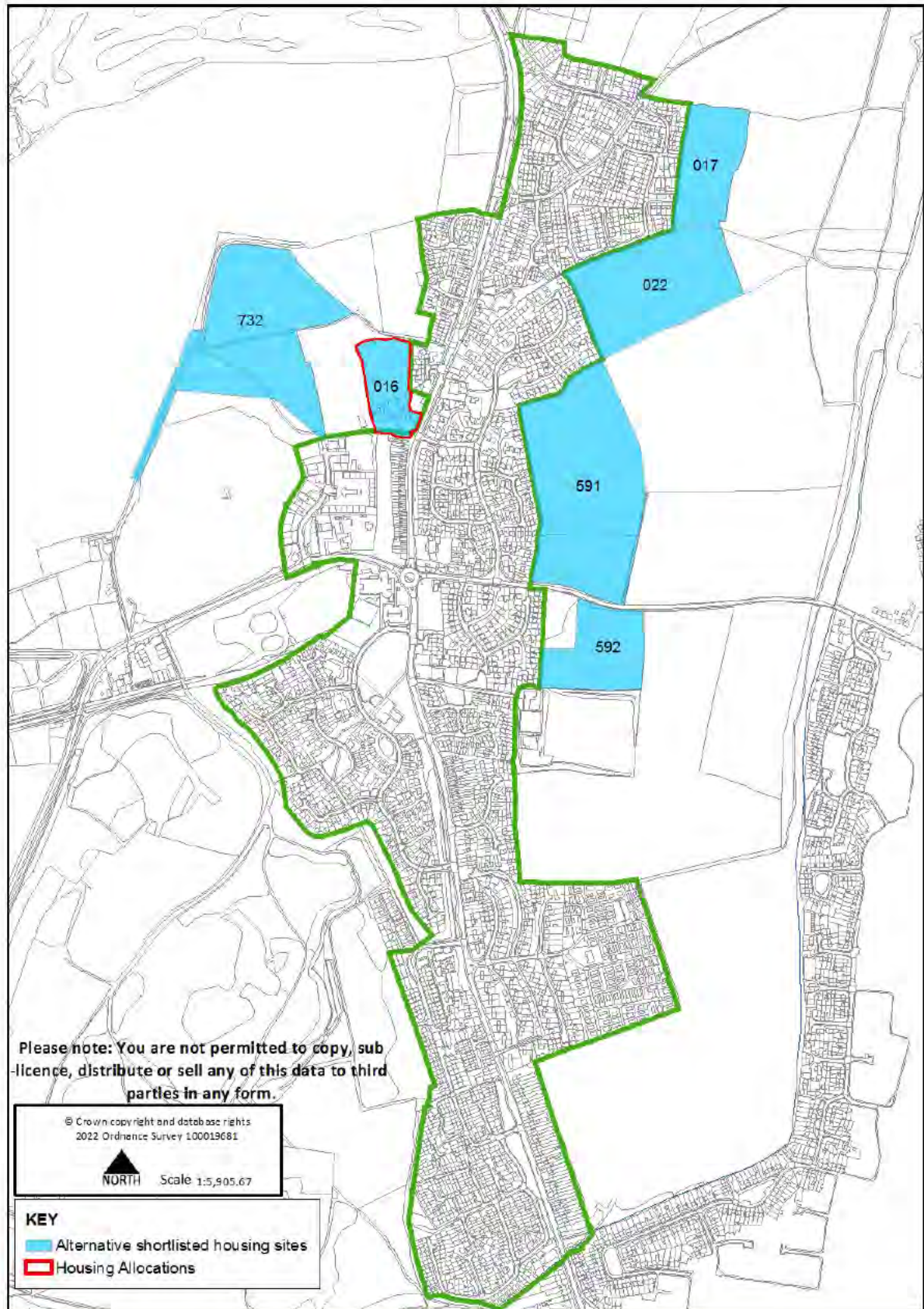
Reasons for safeguarded land (non-Green Belt) allocations

- 5.9.6 Huntington contains an existing safeguarded land site (Site 016). This site is non-Green Belt and needs to be proactively explored for its potential to assist in meeting the District's proposed housing target. The site assessment process has revealed no unmitigable

constraints to the delivery of this site, which was also considered suitable for safeguarding through the examination of the Site Allocations Document as recently as 2018.

Reasons for lack of additional Green Belt allocations

- 5.9.7 The Council's site selection process has not revealed any additional deliverable non-Green Belt sites in this location beyond the existing safeguarded land site. Additional Green Belt release will therefore be required in this broad location to realise the Council's preferred Spatial Housing Strategy. However, having reviewed the site assessment outcomes, all potential Green Belt site options are affected by significant constraints, namely highways concerns, unmitigable major negative impacts in the Sustainability Appraisal and objections from the Cannock Chase AONB unit. There is also sufficient small site supply in existing commitments and allocations in the District to ensure that to Council can meet its small sites duty without further Green Belt release. This warrants a departure from the spatial housing strategy originally set out in the 2019 SHSID consultation and 2021 Preferred Options consultation.



5.10 Essington

- 5.10.1 The Council's preferred Spatial Housing Strategy, as set out in the Council's Local Plan Review – Publication Plan consultation, seeks to limit housing growth in Essington to existing suitable sites within the village's development boundary and safeguarded land. At a strategic level, the limited level of growth in this broad location recognises the village's more limited level of facilities and public transport links, as reflected in its status as a Tier 3 village. It also reflects the village's close proximity to the northern edge of the Black Country, which is allocated for significant growth under the Council's preferred strategy and is considered to be a more sustainable option for accommodating growth needs.
- 5.10.2 Existing planning permissions, existing housing allocations without planning permission and dwellings completed after 1 April 2018 can deliver approximately 235 dwellings during the plan period. Key sites contributing towards this figure are set out in Table 9 below. Please note this table does not include all small planning permissions in and around this location, focusing on large sites only (10+ dwellings).

Table 9			
Site reference	Site address	Planning approval reference	Dwelling delivery 2018 - 2039
Existing planning permissions			
ES/99	Land off Hobnock Road	18/00450/REM	230

- 5.10.3 Summary conclusions from the site assessment process for housing allocations are set out below. The Council has had regard to the relative merits of all sites in selecting its preferred sites, which are summarised in full in the proformas set out in Appendix 3. The conclusions set out below are only intended as a narrative summary of key points and should be read alongside the full site assessment pro-formas and the wider evidence base that has informed the Council's site selection.

Reasons for development boundary allocations

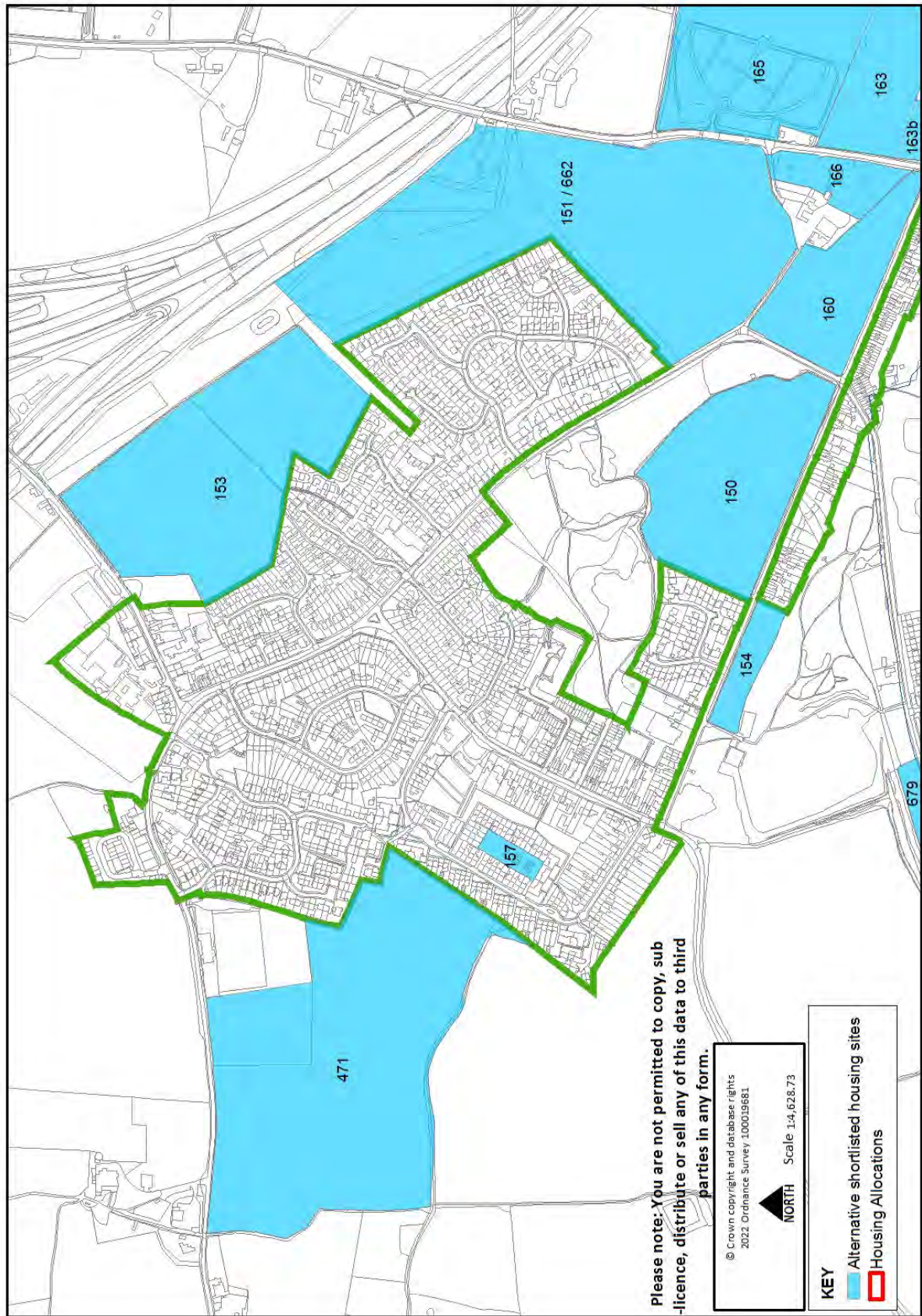
- 5.10.4 There is one development boundary site option in Essington without an existing planning permission for housing growth (Site 157 – Hill Street, Essington). This may have capacity to accommodate the minimum of 10 dwellings required by the Council's site selection threshold. However, the site is a historic site suggestion that has not been progressed by the site owner under the Council's previous Local Plan, despite being in the development boundary of a village where housing growth was supported. The landowner has also recently confirmed that the site is not available. Given this and the significant loss of parking that would result from redevelopment, the site does not currently appear to be available for housing growth.

Reasons for safeguarded land (non-Green Belt) allocations

- 5.10.5 There is also an existing safeguarded land site at Hobnock Road (ES/99), which already has a planning permission for 230 dwellings. It is proposed to amend the development boundary to include this area of housing growth.

Reasons for lack of additional Green Belt allocations

- 5.10.6 All Green Belt site options are affected by constraints, such as unmitigable major negative education effects in the Sustainability Appraisal, initial concerns from the Highways Authority or loss of public open space. Therefore, having considered all reasonable alternative sites adjacent to Essington, no site is considered to perform so well as to change the Council's preferred spatial housing strategy.



5.11 Coven

- 5.11.1 The Council's preferred Spatial Housing Strategy, as set out in the Council's Local Plan Review – Publication Plan consultation, does not seek to allocate additional housing growth in Coven over the plan period 2018 to 2039, other than existing suitable development boundary sites and the safeguarded land adjacent to the village. At a strategic level, the limited level of growth in this broad location recognises the village's more limited level of facilities and public transport links, as reflected in its status as a Tier 3 village. It also reflects the village's close proximity to the northern edge of the Black Country, which is allocated for significant growth under the Council's preferred strategy and is considered to be a more sustainable option for accommodating growth needs.
- 5.11.2 Existing planning permissions, existing housing allocations without planning permission and dwellings completed after 1 April 2018 can deliver approximately 66 dwellings during the plan period. Key sites contributing towards this figure are set out in Table 10 below. Please note this table does not include all small planning permissions in and around this location, focusing on large sites only (10+ dwellings).

Table 10			
Site reference	Site address	Planning approval reference	Dwelling delivery 2018 - 2038
Existing planning permissions			
SAD Site 086	Land west of School Lane	18/00558/FUL	63

- 5.11.3 Summary conclusions from the site assessment process for housing allocations are set out below. The Council has had regard to the relative merits of all sites in selecting its preferred sites, which are summarised in full in the proformas set out in Appendix 3. The conclusions set out below are only intended as a narrative summary of key points and should be read alongside the full site assessment pro-formas and the wider evidence base that has informed the Council's site selection.

Summary of proposed allocations in Coven

New development boundary sites and existing allocations being re-confirmed as suitable
- none

Allocations on existing safeguarded land
- Site 082 (Land between A449 Stafford Rd & School Lane) – minimum delivery of approximately 48 dwellings

New allocations in Green Belt around Coven
- none

- 5.11.4 To assist in explaining the Council's reasons for allocation summary narrative reasons for the selection of the sites are also summarised below. These should be read alongside the site assessment pro-formas in Appendix 3, which have been considered in full by the Council before reaching any decisions regarding new allocations.

Reasons for development boundary allocations

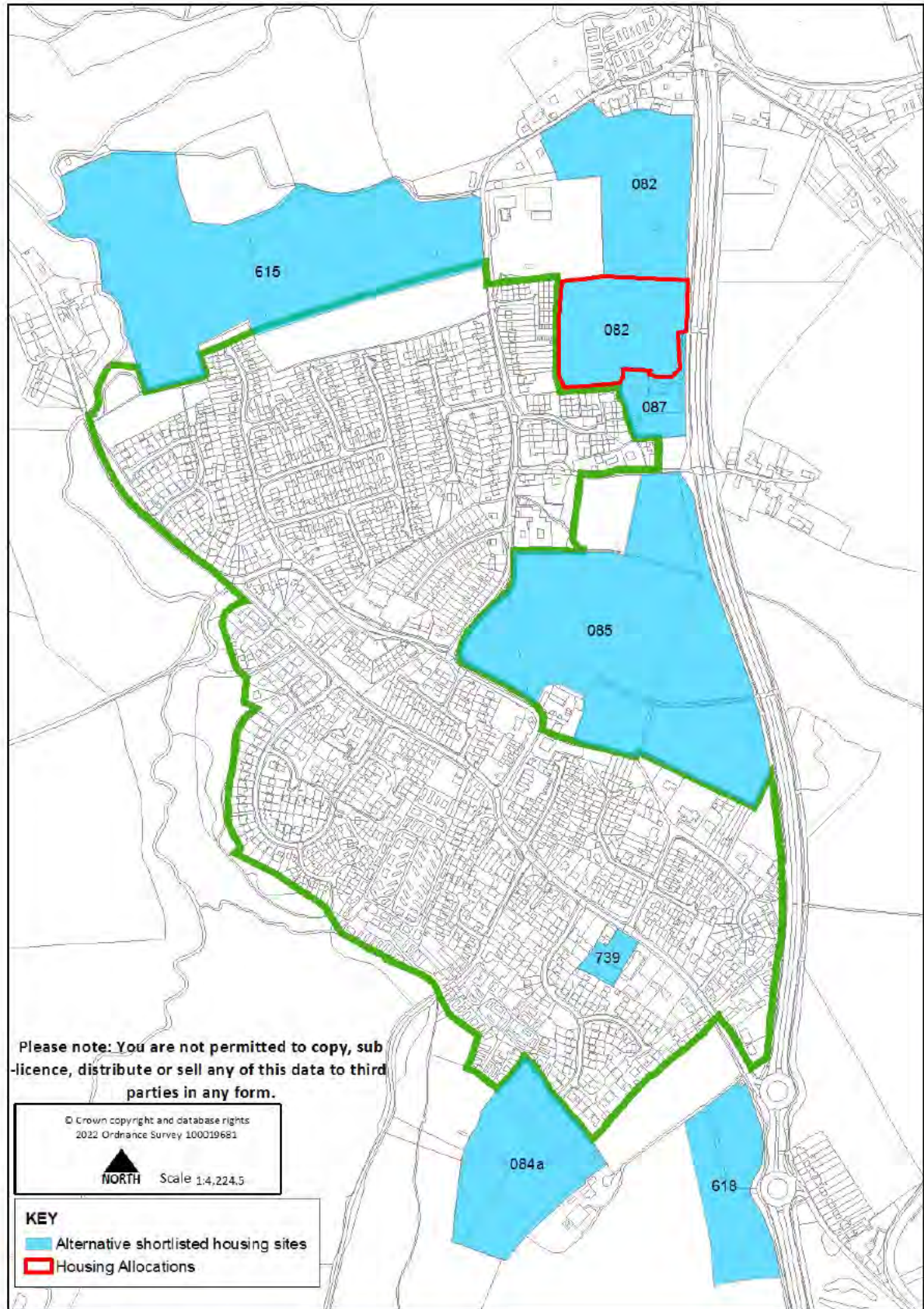
- 5.11.5 There is an existing major planning permission within the development boundary of the village on the previously allocated housing site west of School Lane. However, outside of that existing planning permission, the only other large site suggestion with capacity to accommodate residential growth is Site 739 (Croft Garage). This is currently occupied by commercial uses and is not available for redevelopment. Therefore, no development boundary locations are proposed for new housing allocations.

Reasons for safeguarded land (non-Green Belt) allocations

- 5.11.6 Coven contains an existing safeguarded land site (Site 082). This site is non-Green Belt and needs to be proactively explored for its potential to assist in meeting the District's proposed housing target. The site assessment process has revealed no unmitigable constraints to the delivery of the safeguarded land on Site 082 and this site was considered suitable for safeguarding through the examination of the Site Allocations Document as recently as 2018. Therefore, this site is proposed for allocation.

Reasons for lack of additional Green Belt allocations

- 5.11.7 Outside of Site 082, all Green Belt site options are affected by constraints, such as unmitigable major negative education effects in the Sustainability Appraisal, initial concerns from the Highways Authority or loss of public open space. Therefore, having considered all reasonable alternative sites adjacent to Coven, no site is considered to perform so well as to change the Council's preferred spatial housing strategy.



5.12 Featherstone

- 5.12.1 The Council's preferred Spatial Housing Strategy, as set out in the Council's Local Plan Review – Publication Plan consultation, does not seek to allocate additional housing growth in Featherstone over the plan period 2018 to 2039, other than existing suitable development boundary sites and the safeguarded land adjacent to the village. At a strategic level, the limited level of growth in this broad location recognises the village's more limited level of facilities and public transport links, as reflected in its status as a Tier 3 village. It also reflects the village's close proximity to the northern edge of the Black Country, which is allocated for significant growth under the Council's preferred strategy and is considered to be a more sustainable option broad location for accommodating growth needs.
- 5.12.2 Existing planning permissions, existing housing allocations without planning permission and dwellings completed after 1 April 2018 can deliver approximately 86 dwellings during the plan period. Key sites contributing towards this figure are set out in Table 11 below. Please note this table does not include all small planning permissions in and around this location, focusing on large sites only (10+ dwellings).

Table 11			
Site reference	Site address	Planning approval reference	Dwelling delivery 2018 - 2039
<i>Existing allocations without planning permission</i>			
SAD Site 168	Land at Brinsford Lodge, Featherstone	19/00919/FUL	81

- 5.12.3 Summary conclusions from the site assessment process for housing allocations are set out below. The Council has had regard to the relative merits of all sites in selecting its preferred sites, which are summarised in full in the proformas set out in Appendix 3. The conclusions set out below are only intended as a narrative summary of key points and should be read alongside the full site assessment pro-formas and the wider evidence base that has informed the Council's site selection.

Summary of proposed allocations in Featherstone

New development boundary sites and existing allocations being re-confirmed as suitable
- none

Allocations on existing safeguarded land
- Site 397 (Land adjacent to Brinsford Lodge) – minimum delivery of approximately 35 dwellings

New allocations in Green Belt around Featherstone
- none

- 5.12.4 To assist in explaining the Council's reasons for allocation summary narrative reasons for the selection of the sites are also summarised below. These should be read alongside the site assessment pro-formas in Appendix 3, which have been considered in full by the Council before reaching any decisions regarding new allocations.

Reasons for development boundary allocations

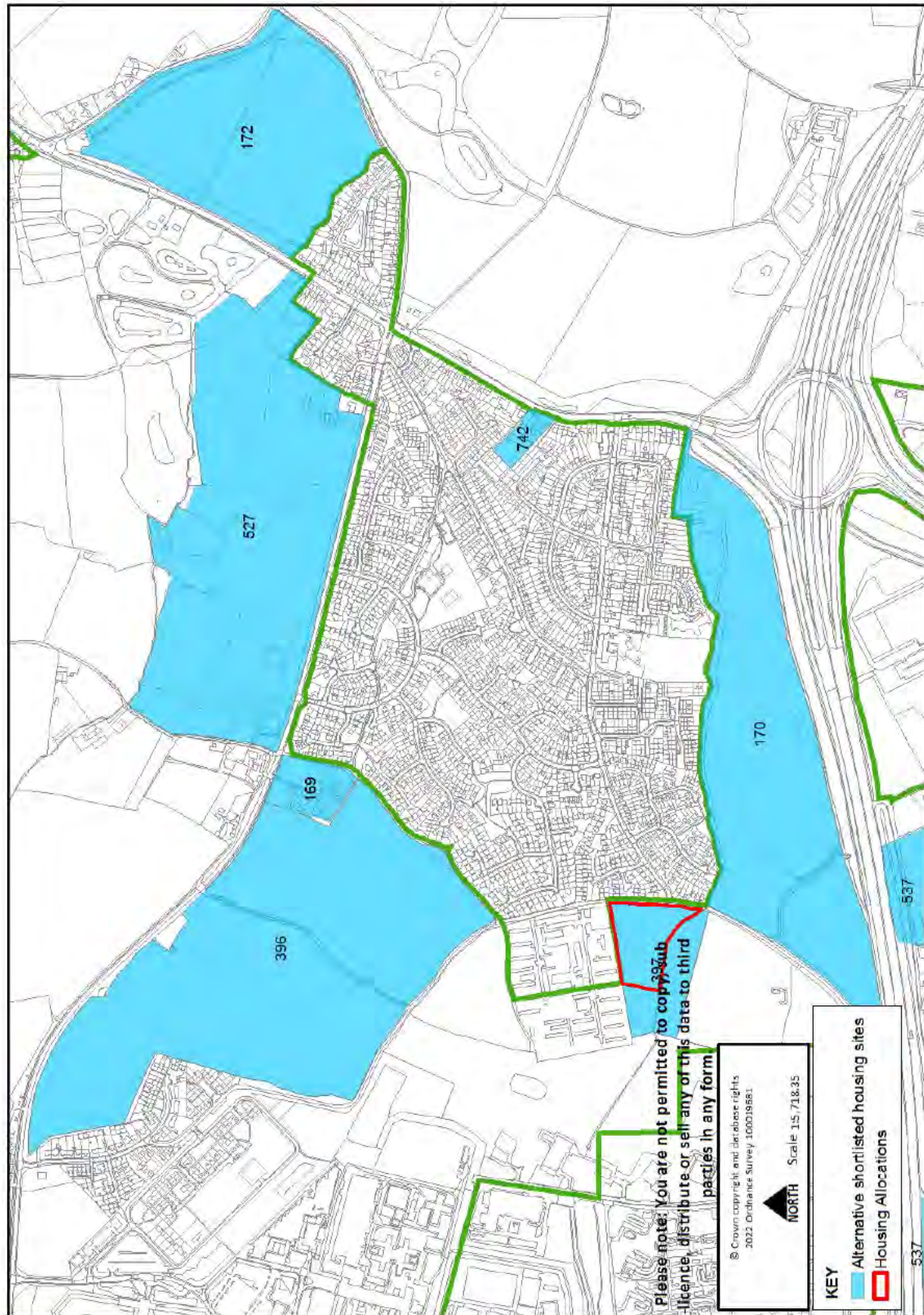
- 5.12.5 There is an existing major planning permission within the development boundary of the village on the previously allocated housing site at Brinsford Lodge. However, outside of that existing planning permission, the only other large site suggestion with capacity to accommodate residential growth is Site 742 (Red White and Blue public house). This is currently an essential community facility that has not been demonstrated as being surplus to requirements. Therefore, no development boundary locations are proposed for new housing allocations.

Reasons for safeguarded land (non-Green Belt) allocations

- 5.12.6 Featherstone contains an existing safeguarded land site (Site 397). This site is non-Green Belt and needs to be proactively explored for its potential to assist in meeting the District's proposed housing target. The site assessment process has revealed no unmitigable constraints to the delivery of the safeguarded land on Site 397 and this site was considered suitable for safeguarding through the examination of the Site Allocations Document as recently as 2018. Therefore, this site is proposed for allocation.

Reasons for lack of additional Green Belt allocations

- 5.12.7 All Green Belt site options are affected by constraints, such as unmitigable major negative education effects in the Sustainability Appraisal, initial concerns from the Highways Authority or significant heritage concerns raised through the Historic Environment Site Assessment. Therefore, having considered all reasonable alternative sites adjacent to Featherstone, no site is considered to perform so well as to change the Council's preferred spatial housing strategy.



5.13 Shareshill

- 5.13.1 The Council's preferred Spatial Housing Strategy, as set out in the Council's Local Plan Review –Publication Plan consultation, seeks to limit housing growth in Shareshill to existing suitable sites within the village's development boundary. At a strategic level, the limited level of growth in this broad location recognises the village's more limited level of facilities and public transport links, as reflected in its status as a Tier 3 village. It also reflects the village's close proximity to the northern edge of the Black Country, which is allocated for significant growth under the Council's preferred strategy and is considered to be a more sustainable option broad location for accommodating growth needs.
- 5.13.2 Existing planning permissions, existing housing allocations without planning permission and dwellings completed after 1 April 2018 in Shareshill can deliver 3 dwellings during the plan period.
- 5.13.3 Summary conclusions from the site assessment process for housing allocations are set out below. The Council has had regard to the relative merits of all sites in selecting its preferred sites, which are summarised in full in the proformas set out in Appendix 3. The conclusions set out below are only intended as a narrative summary of key points and should be read alongside the full site assessment pro-formas and the wider evidence base that has informed the Council's site selection.

Reasons for development boundary allocations

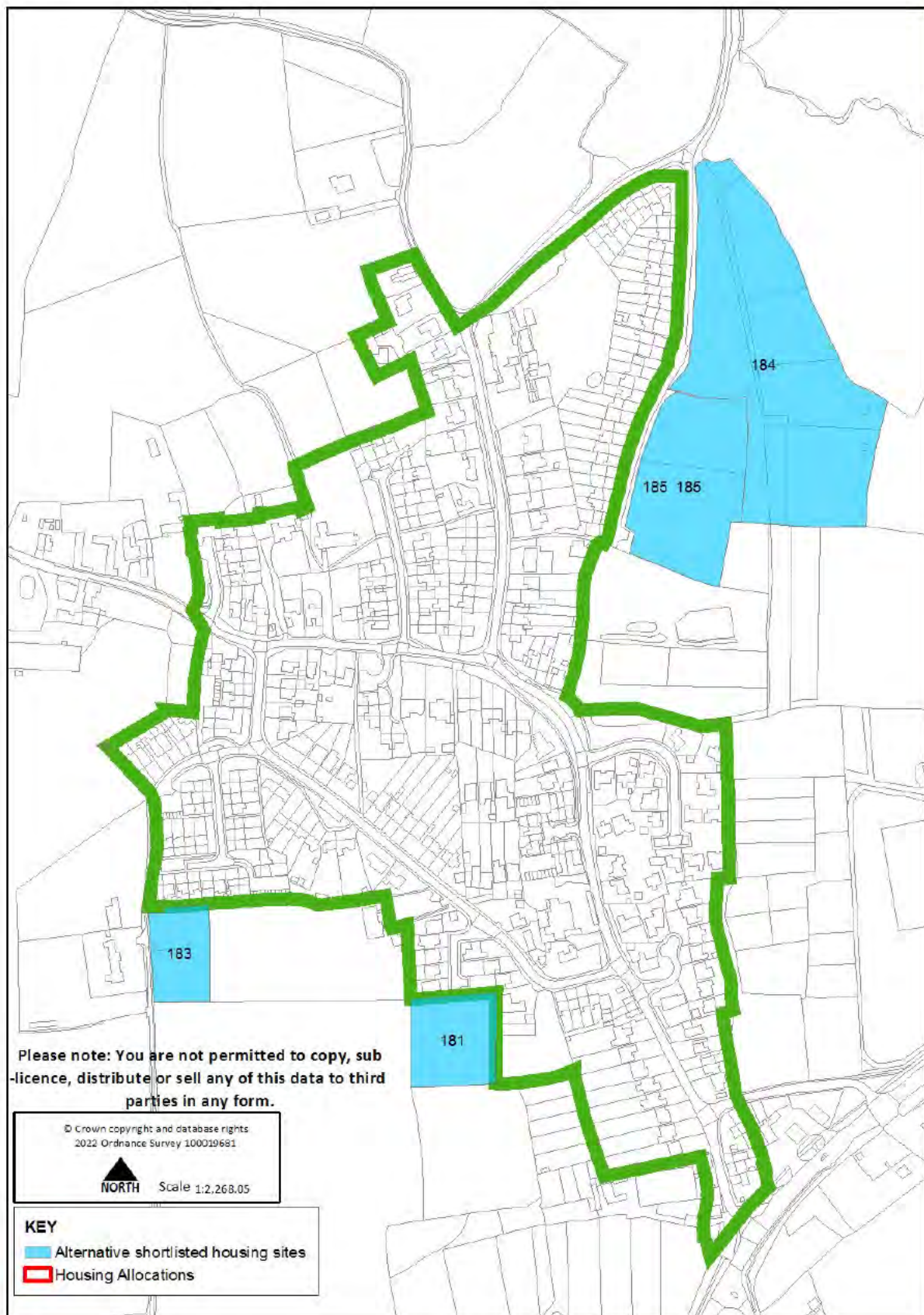
- 5.13.4 No large site suggestions with capacity to accommodate residential growth have been identified within the development boundary. Therefore, no development boundary locations are proposed for new housing allocations.

Reasons for lack of safeguarded land allocations

- 5.13.5 No safeguarded land exists adjacent to Shareshill village. Therefore, no safeguarded land locations are proposed for new housing allocations.

Reasons for lack of additional Green Belt allocations

- 5.13.6 All Green Belt site options are affected by constraints, specifically initial concerns from the Highways Authority and concerns regarding pedestrian access to the sites. Therefore, having considered all reasonable alternative sites adjacent to Shareshill, no site is considered to perform so well as to change the Council's preferred spatial housing strategy.



5.14 Wheaton Aston

- 5.14.1 The Council's preferred Spatial Housing Strategy, as originally set out in the Council's 2019 Spatial Housing Strategy and Infrastructure Delivery (SHSID) consultation and 2021 Preferred Options consultation, sought to locate a limited level of additional housing growth in Wheaton Aston over the plan period to deliver two new small site allocations (<1 hectare) in addition to the existing allocated land in the village. At a strategic level, the limited level of growth in this broad location recognised the village's more limited level of facilities and public transport links, as reflected in its status as a Tier 3 village, whilst balancing this against the village's location outside of the Green Belt, in Open Countryside land.
- 5.14.2 Existing planning permissions, existing housing allocations without planning permission and dwellings completed after 1 April 2018 can deliver approximately 67 dwellings during the plan period. Key sites contributing towards this figure are set out in Table 12 below. Please note this table does not include all small planning permissions in and around this location, focusing on large sites only (10+ dwellings).

Table 12			
Site reference	Site address	Planning approval reference	Dwelling delivery 2018 - 2039
Existing planning permissions			
LY/95	Land West of Ivetsey Road	18/00392/REM	30
Allocated sites without planning permission			
SAD Site 379	Land East of Ivetsey Road	n/a	18

- 5.14.3 Summary conclusions from the site assessment process for housing allocations are set out below. The Council has had regard to the relative merits of all sites in selecting its preferred sites, which are summarised in full in the proformas set out in Appendix 3. The conclusions set out below are only intended as a narrative summary of key points and should be read alongside the full site assessment pro-formas and the wider evidence base that has informed the Council's site selection.

Summary of proposed allocations in Wheaton Aston

New development boundary sites and existing allocations being re-confirmed as suitable

- SAD Site 379 (Land East of Ivetsey Road) - minimum delivery of approximately 18 dwellings, which is already accounted for in the existing commitments in this broad location
- Site 426a (Bridge Farm 54 Long Street) - minimum delivery of approximately 15 dwellings

New allocations in Open Countryside around Wheaton Aston

- none

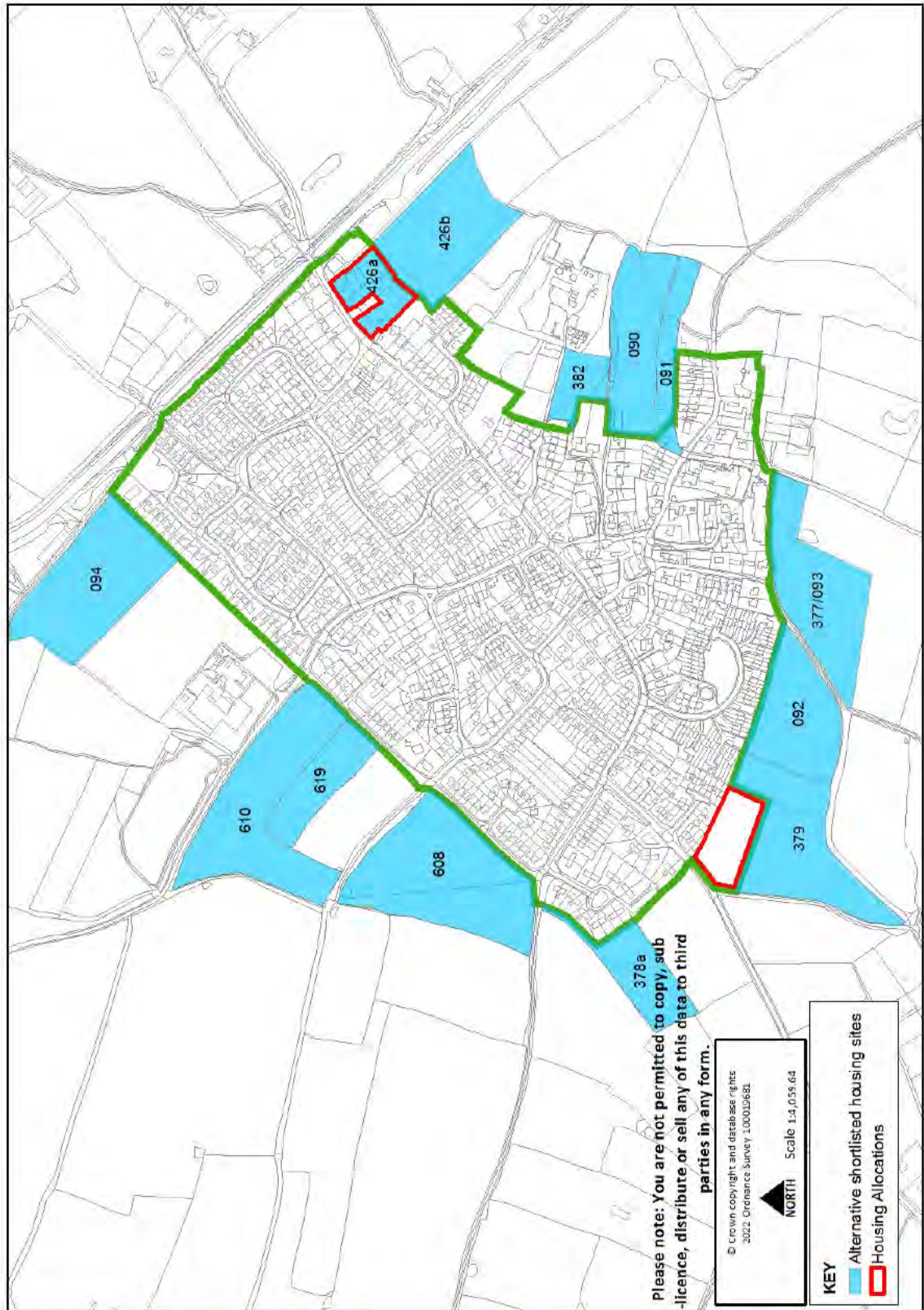
- 5.14.4 To assist in explaining the Council's reasons for allocation summary narrative reasons for the selection of the sites are also summarised below. These should be read alongside the site assessment pro-formas in Appendix 3, which have been considered in full by the Council before reaching any decisions regarding new allocations.

Reasons for development boundary allocations

- 5.14.5 There is an existing allocated site without planning permission within the village's development boundary (SAD Site 379) as well as a development boundary site that is not affected by any significant constraints likely to prevent development (Site 426a). Both are proposed to be carried forward as housing allocations.

Reasons for lack of additional Open Countryside allocations

- 5.14.6 Whilst the Council's preferred Spatial Housing Strategy originally considered allocating additional growth at Wheaton Aston to deliver two small sites (<1ha each), the findings of the site assessment process and responses to the 2021 Preferred Options consultation have justified a diversion from this approach. Due to windfall housing supply and increased allocations in more sustainable locations in the District and alterations to the Council's local housing need, there is no longer a need to allocate additional growth in Wheaton Aston (a less sustainable Tier 3 settlement) to meet the District's housing requirement. There is also no need for additional allocations to meet the District's small sites requirement. The preferred allocation identified in the Open Countryside (Site 610) in the 2021 Preferred Options consultation has also raised concerns from Natural England due to its potential impacts on the nearby Motte Meadows SAC. Taken together, these factors have been considered sufficient to warrant an alteration to the Spatial Housing Strategy in preparing the Publication Plan.



5.15 Pattingham

- 5.15.1 The Council's preferred Spatial Housing Strategy, as originally set out in the Council's 2019 Spatial Housing Strategy and Infrastructure Delivery (SHSID) consultation and 2021 Preferred Options consultation, sought to locate a limited level of additional housing growth in Pattingham over the plan period, to deliver an additional small site allocation (<1 hectare) alongside the existing safeguarded land in the village. At a strategic level, the limited level of growth in this broad location recognised the village's more limited level of facilities and public transport links, as reflected in its status as a Tier 3 village.
- 5.15.2 Existing planning permissions, existing housing allocations without planning permission and dwellings completed after 1 April 2018 can deliver approximately 7 dwellings during the plan period.
- 5.15.3 Summary conclusions from the site assessment process for housing allocations are set out below. The Council has had regard to the relative merits of all sites in selecting its preferred sites, which are summarised in full in the proformas set out in Appendix 3. The conclusions set out below are only intended as a narrative summary of key points and should be read alongside the full site assessment pro-formas and the wider evidence base that has informed the Council's site selection.

Summary of proposed allocations in Pattingham

New development boundary sites and existing allocations being re-confirmed as suitable

- none

Allocations on existing safeguarded land

- Site 251 (Land at Hall End Lane) - minimum delivery of approximately 17 dwellings

New allocations in Green Belt around Pattingham

- none

- 5.15.4 To assist in explaining the Council's reasons for allocation summary narrative reasons for the selection of the sites are also summarised below. These should be read alongside the site assessment pro-formas in Appendix 3, which have been considered in full by the Council before reaching any decisions regarding new allocations.

Reasons for development boundary allocations

- 5.15.5 No large site suggestions with capacity to accommodate residential growth have been identified within the development boundary. Therefore, no development boundary locations are proposed for new housing allocations.

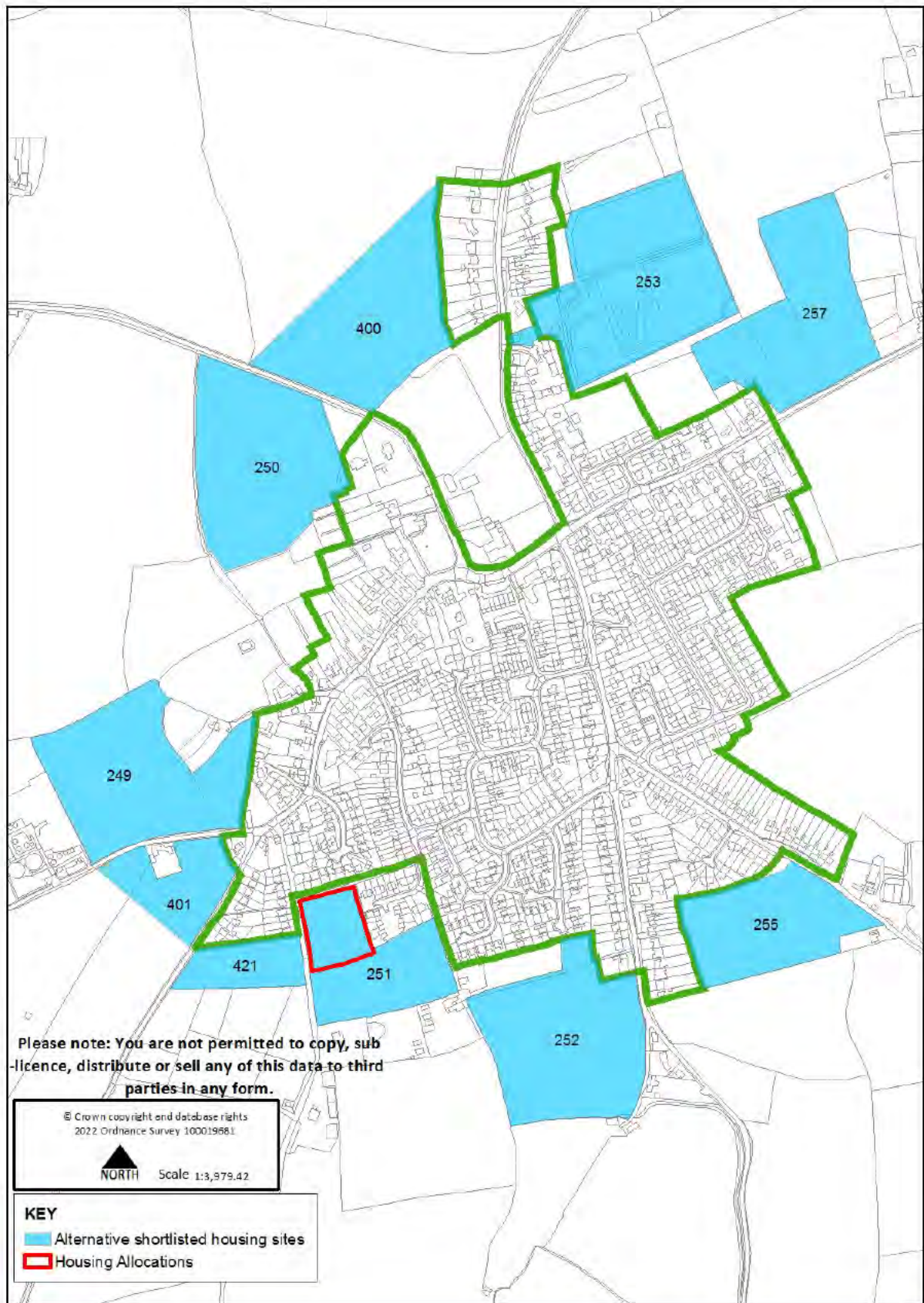
Reasons for safeguarded land (non-Green Belt) allocations

- 5.15.6 Pattingham contains an existing safeguarded land site (Site 251). This site is non-Green Belt and needs to be proactively explored for its potential to assist in meeting the District's proposed housing target.

- 5.15.7 The site assessment process has revealed no unmitigable constraints to the delivery of the safeguarded land on Site 251 and this site was considered suitable for safeguarding through the examination of the Site Allocations Document as recently as 2018. Therefore, this site is proposed for allocation.

Reasons for lack of additional Green Belt allocations

- 5.15.8 Whilst the Council's preferred Spatial Housing Strategy originally considered allocating additional growth on Green Belt land at Pattingham to deliver a small site (<1ha), the findings of the site assessment process and responses to the 2021 Preferred Options consultation have justified a diversion from this approach. As set out elsewhere in this document, since the last consultation additional Green Belt release has been allocated on a larger site at Penkridge, recognising the village's Tier 1 status and the site's access to public transport, proximity to local amenities and lower Green Belt harm. Given this redistribution of further growth to the District's Tier 1 villages and windfall permissions which have occurred since the 2021 consultation, there is no longer a need to allocate a small site for housing growth in Pattingham, which is a comparatively less sustainable Tier 3 village surrounded by Green Belt. The Council can now also meet its small sites duty without any further additional allocations of 1ha or less, further reducing the need for additional growth at Pattingham. Taken together, these factors have been considered sufficient to warrant an alteration to the Spatial Housing Strategy in preparing the Publication Plan.



5.16 Swindon

- 5.16.1 The Council's preferred Spatial Housing Strategy, as set out in the Council's Local Plan Review – Publication Plan consultation, seeks to locate a limited level of additional housing growth in Swindon over the plan period 2018 to 2039, to deliver an additional small site allocation (<1 hectare) alongside the existing safeguarded land in the village. At a strategic level, the limited level of growth in this broad location recognises the village's more limited level of facilities and public transport links, as reflected in its status as a Tier 3 village.
- 5.16.2 Existing planning permissions, existing housing allocations without planning permission and dwellings completed after 1 April 2018 can deliver approximately 9 dwellings during the plan period. Larger sites contributing towards this figure are set out in Table 13 below. Please note this table does not include all small planning permissions in and around this location, focusing on large sites only (10+ dwellings).

Table 13			
Site reference	Site address	Planning approval reference	Dwelling delivery 2018 - 2038
Existing allocations without planning permission			
SAD Site 313	Land off Himley Lane (north)	n/a	0*

*Correspondence with the site promoter indicates that the site may not be able to deliver a minimum of 10 dwellings within the current development boundary

- 5.16.3 Summary conclusions from the site assessment process for housing allocations are set out below. The Council has had regard to the relative merits of all sites in selecting its preferred sites, which are summarised in full in the proformas set out in Appendix 3. The conclusions set out below are only intended as a narrative summary of key points and should be read alongside the full site assessment pro-formas and the wider evidence base that has informed the Council's site selection.

Summary of proposed allocations in Swindon

New development boundary sites and existing allocations being re-confirmed as suitable
 - SAD Site 313 (Land off Himley Lane) - minimum delivery of approximately 22 dwellings across SAD Site 313 and safeguarded and Green Belt elements of Site 313

Allocations on existing safeguarded land
 - Site 313 (Land off Himley Lane) – delivered alongside SAD Site 313 and Green Belt elements of Site 313 to deliver a single small site

New allocations in Green Belt around Swindon
 - Site 313 (Land off Himley Lane) – delivered alongside SAD Site 313 and safeguarded land elements of Site 313 to deliver a single small site

- 5.16.4 To assist in explaining the Council's reasons for allocation narrative reasons for the selection of the sites are also summarised below. These should be read alongside the site assessment pro-formas in Appendix 3, which have been considered in full by the Council before reaching any decisions regarding new allocations.

Reasons for development boundary allocations

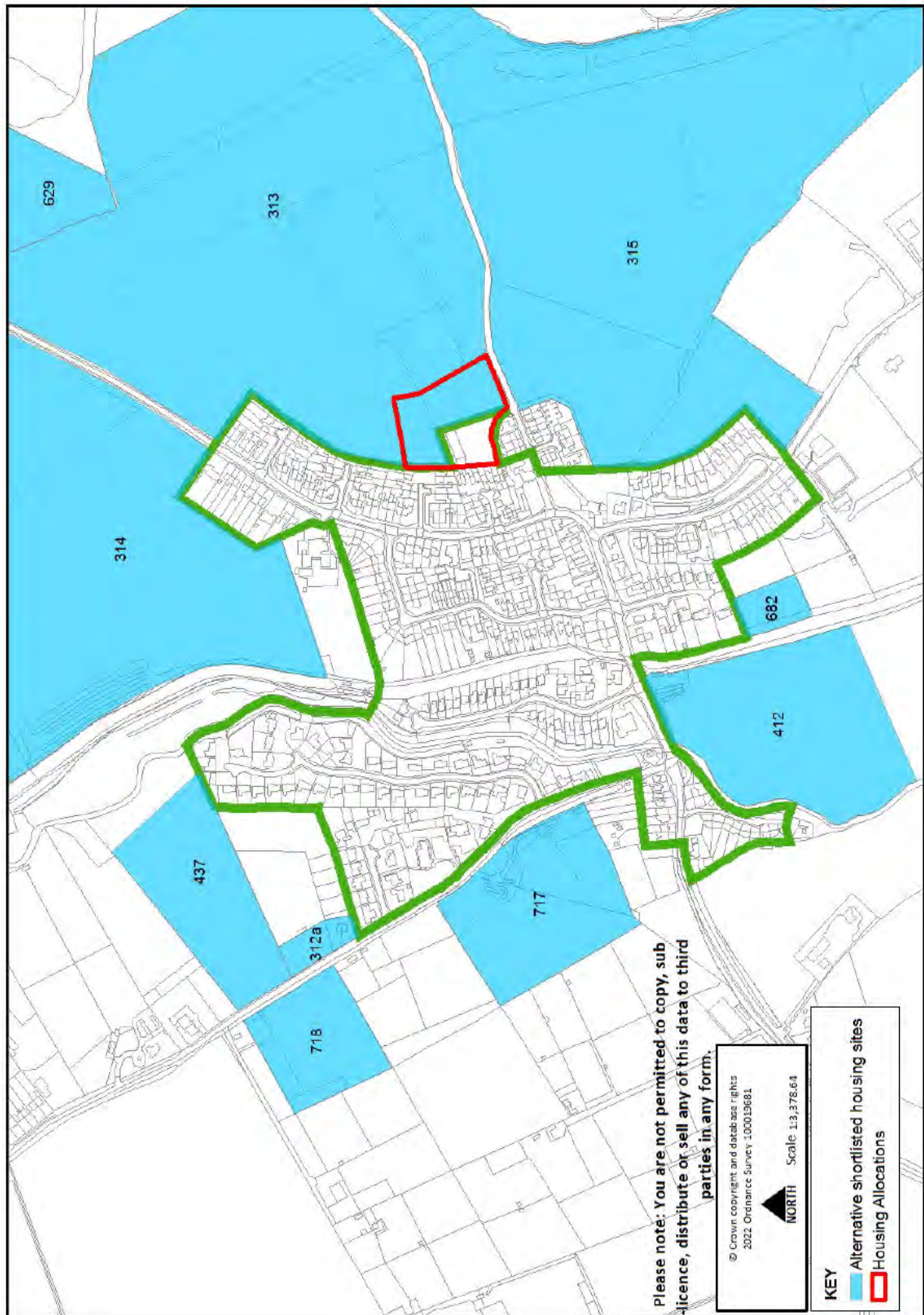
- 5.16.5 There is an existing allocated site (SAD Site 313), which is proposed for reallocation as it has not yet formally achieved permission or seen an application submitted on the site. Outside of this site, no further large site suggestions with capacity to accommodate residential growth have been identified within the development boundary. However, previous correspondence with the landowner suggests that, in isolation, they do not consider the site can achieve a scheme of 10 or more dwellings whilst maintaining the existing proposed development boundary. It is therefore uncertain whether the existing housing allocation is deliverable if confined to the current development boundary.

Reasons for safeguarded land (non-Green Belt) allocations

- 5.16.6 Swindon contains an existing safeguarded land site (Site 313) which sits directly north of the existing allocated housing site. This site is non-Green Belt and needs to be proactively explored for its potential to assist in meeting the District's proposed housing target. However, given the irregular site layout of the safeguarded land, the need to ensure sufficient allocations of 1 hectare or less and the potential to realise a better site layout through use of Green Belt elements of Site 313, only part of the safeguarded land is proposed for allocation alongside SAD Site 313 and Green Belt elements of Site 313. The remainder of the safeguarded land (approximately 0.6ha) will remain as safeguarded to ensure the wider site does not exceed 1 hectare.

Reasons for additional Green Belt allocations adjacent Swindon

- 5.16.7 Of the Green Belt site options, some have significant issues that affect their ability to be allocated (e.g. lack of availability, Flood Zones constraining layout, Highways Authority concerns, unlikely to deliver affordable housing due to site size). Of the other Green Belt site options around the village, the majority are in similar areas of landscape sensitivity and in terms of the outcomes of the Sustainability Appraisal, but vary in terms of their Green Belt harm. Site 313 is in the lowest area of Green Belt harm without being affected by other constraints such as those set out above. To ensure that previously allocated land and safeguarded land can be made deliverable, the extent of Green Belt release is limited to the amount needed to create a single small site off Himley Lane. This creates a single, regularly sized, site of 1 hectare, made up of the existing allocated SAD Site 313 alongside a portion of the safeguarded land and a portion of the Green Belt land on Site 313.



5.17 Bednall

- 5.17.1 Bednall is a Tier 4 village in the Council's settlement hierarchy. The Council's preferred Spatial Housing Strategy, as previously set out in the Council's 2019 Spatial Housing Strategy and Infrastructure Delivery (SHSID) consultation, sought opportunities to deliver sites of up to 1 hectare at the District's Tier 4 villages, where suitable sites can be identified. At a strategic level, the limited level of growth in Tier 4 villages recognised the more limited level of facilities and public transport links in these settlements, but also that such settlements may also have a role in contributing to the requirement for 10% of new allocations on sites of 1 hectare or less and that limited development may support local infrastructure opportunities.
- 5.17.2 Existing planning permissions, existing housing allocations without planning permission and dwellings completed after 1 April 2018 in Bednall can deliver approximately 13 dwellings during the plan period.
- 5.17.3 Summary conclusions from the site assessment process for housing allocations are set out below. The Council has had regard to the relative merits of all sites in selecting its preferred sites, which are summarised in full in the proformas set out in Appendix 3. The conclusions set out below are only intended as a narrative summary of key points and should be read alongside the full site assessment pro-formas and the wider evidence base that has informed the Council's site selection.

Reasons for development boundary allocations

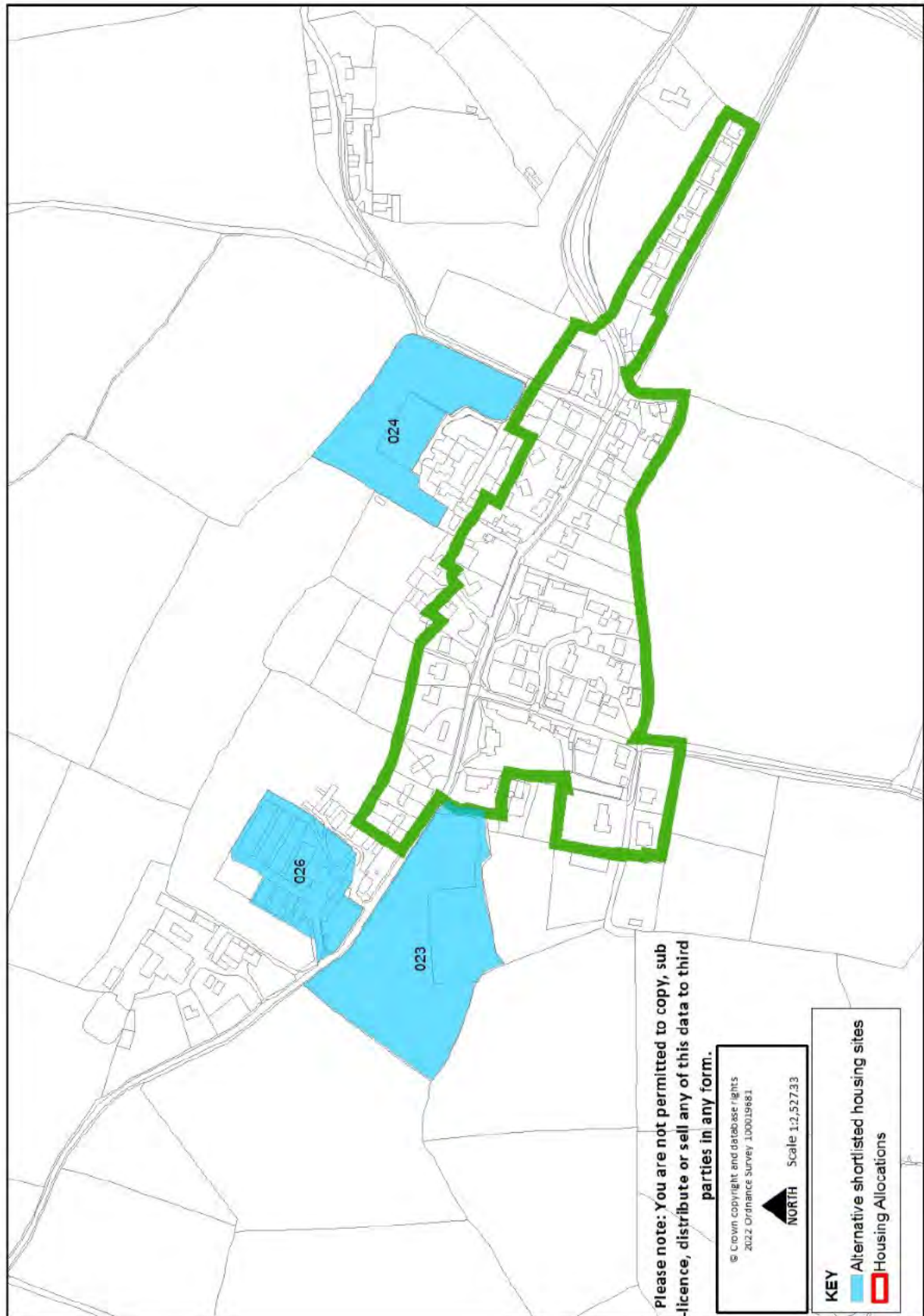
- 5.17.4 No large site suggestions with capacity to accommodate residential growth have been identified within the development boundary. Therefore, no development boundary locations are proposed for new housing allocations.

Reasons for lack of safeguarded land allocations

- 5.17.5 No safeguarded land exists adjacent to Bednall village. Therefore, no safeguarded land locations are proposed for new housing allocations.

Reasons for lack of additional Green Belt allocations

- 5.17.6 All Green Belt site options are affected by constraints, specifically initial concerns from the Highways Authority, unmitigable major negative employment impacts in the Sustainability Appraisal and concerns regarding pedestrian connectivity. Current monitoring evidence also suggests that the Council can deliver 10% of its housing allocations on small sites in Tier 1-3 villages, without requiring additional allocations in less sustainable Tier 4 settlements. Therefore, none of the sites are considered to perform so well as to warrant a Green Belt allocation.



5.18 Dunston

- 5.18.1 Dunston is a Tier 4 village in the Council's settlement hierarchy. The Council's preferred Spatial Housing Strategy, as previously set out in the Council's 2019 Spatial Housing Strategy and Infrastructure Delivery (SHSID) consultation, sought opportunities to deliver sites of up to 1 hectare at the District's Tier 4 villages, where suitable sites can be identified. At a strategic level, the limited level of growth in Tier 4 villages recognised the more limited level of facilities and public transport links in these settlements, but also that such settlements may also have a role in contributing to the requirement for 10% of new allocations on sites of 1 hectare or less and that limited development may support local infrastructure opportunities.
- 5.18.2 Existing planning permissions, existing housing allocations without planning permission and dwellings completed after 1 April 2018 in Dunston can deliver 1 dwelling during the plan period.
- 5.18.3 Summary conclusions from the site assessment process for housing allocations are set out below. The Council has had regard to the relative merits of all sites in selecting its preferred sites, which are summarised in full in the proformas set out in Appendix 3. The conclusions set out below are only intended as a narrative summary of key points and should be read alongside the full site assessment pro-formas and the wider evidence base that has informed the Council's site selection.

Reasons for development boundary allocations

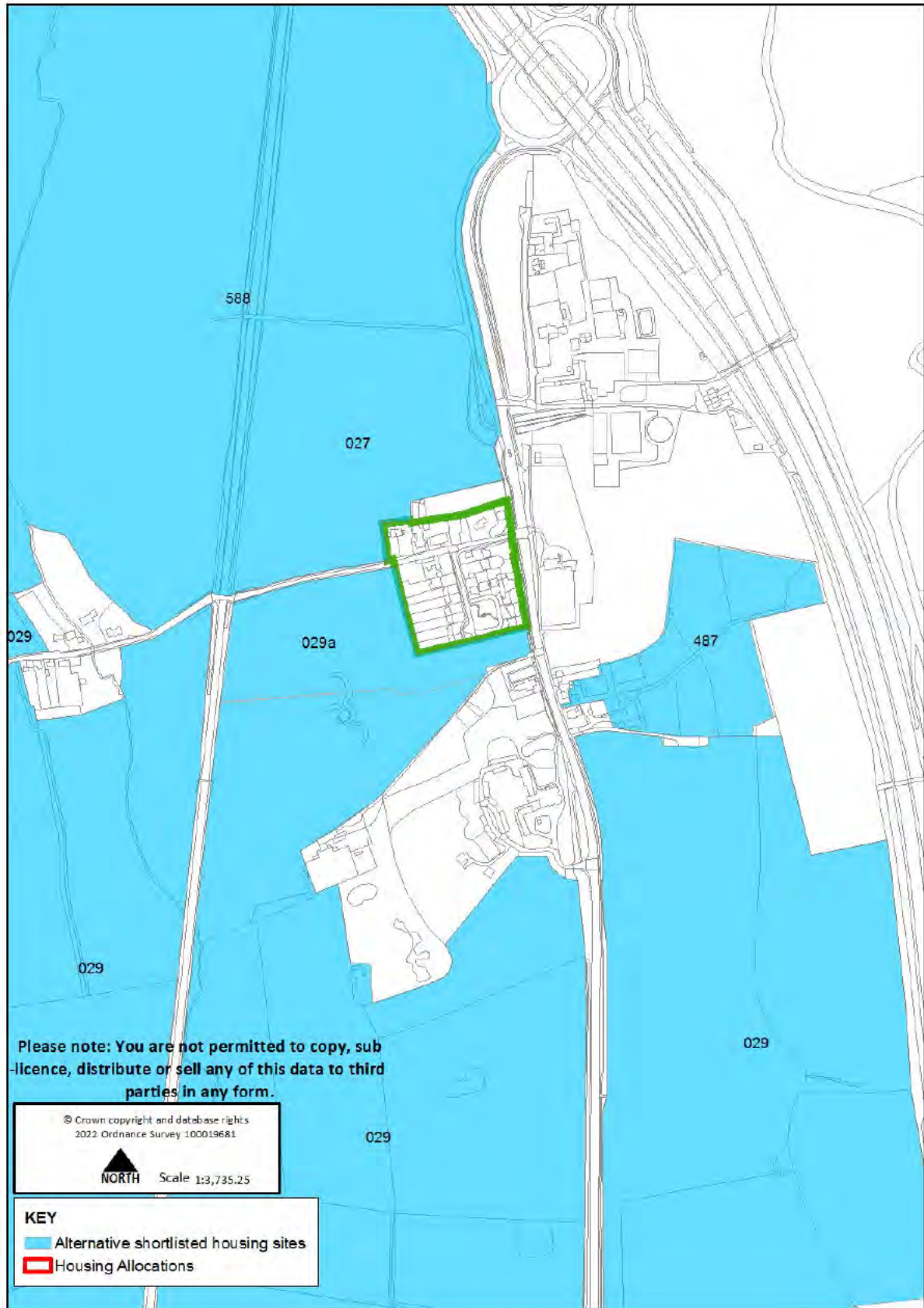
- 5.18.4 No large site suggestions with capacity to accommodate residential growth have been identified within the development boundary. Therefore, no development boundary locations are proposed for new housing allocations.

Reasons for lack of safeguarded land allocations

- 5.18.5 No safeguarded land exists adjacent to Dunston village. Therefore, no safeguarded land locations are proposed for new housing allocations.

Reasons for lack of additional Open Countryside allocations

- 5.18.6 All Open Countryside site options are affected by constraints, specifically initial concerns from the Highways Authority and unmitigable major negatives against the education criteria in the Sustainability Appraisal. Current monitoring evidence also suggests that the Council can deliver 10% of its housing allocations on small sites in Tier 1-3 villages, without requiring additional allocations in less sustainable Tier 4 settlements. Therefore, none of the sites are considered to perform so well as to warrant an additional housing allocation.



5.19 Bishops Wood

- 5.19.1 Bishops Wood is a Tier 4 village in the Council's settlement hierarchy. The Council's preferred Spatial Housing Strategy, as previously set out in the Council's 2019 Spatial Housing Strategy and Infrastructure Delivery (SHSID), sought opportunities to deliver sites of up to 1 hectare at the District's Tier 4 villages, where suitable sites can be identified. At a strategic level, the limited level of growth in Tier 4 villages recognised the more limited level of facilities and public transport links in these settlements, but also that such settlements may also have a role in contributing to the requirement for 10% of new allocations on sites of 1 hectare or less and that limited development may support local infrastructure opportunities.
- 5.19.2 Existing planning permissions, existing housing allocations without planning permission and dwellings completed after 1 April 2018 in Bishops Wood can deliver approximately 4 dwellings during the plan period.
- 5.19.3 Summary conclusions from the site assessment process for housing allocations are set out below. The Council has had regard to the relative merits of all sites in selecting its preferred sites, which are summarised in full in the proformas set out in Appendix 3. The conclusions set out below are only intended as a narrative summary of key points and should be read alongside the full site assessment pro-formas and the wider evidence base that has informed the Council's site selection.

Reasons for development boundary allocations

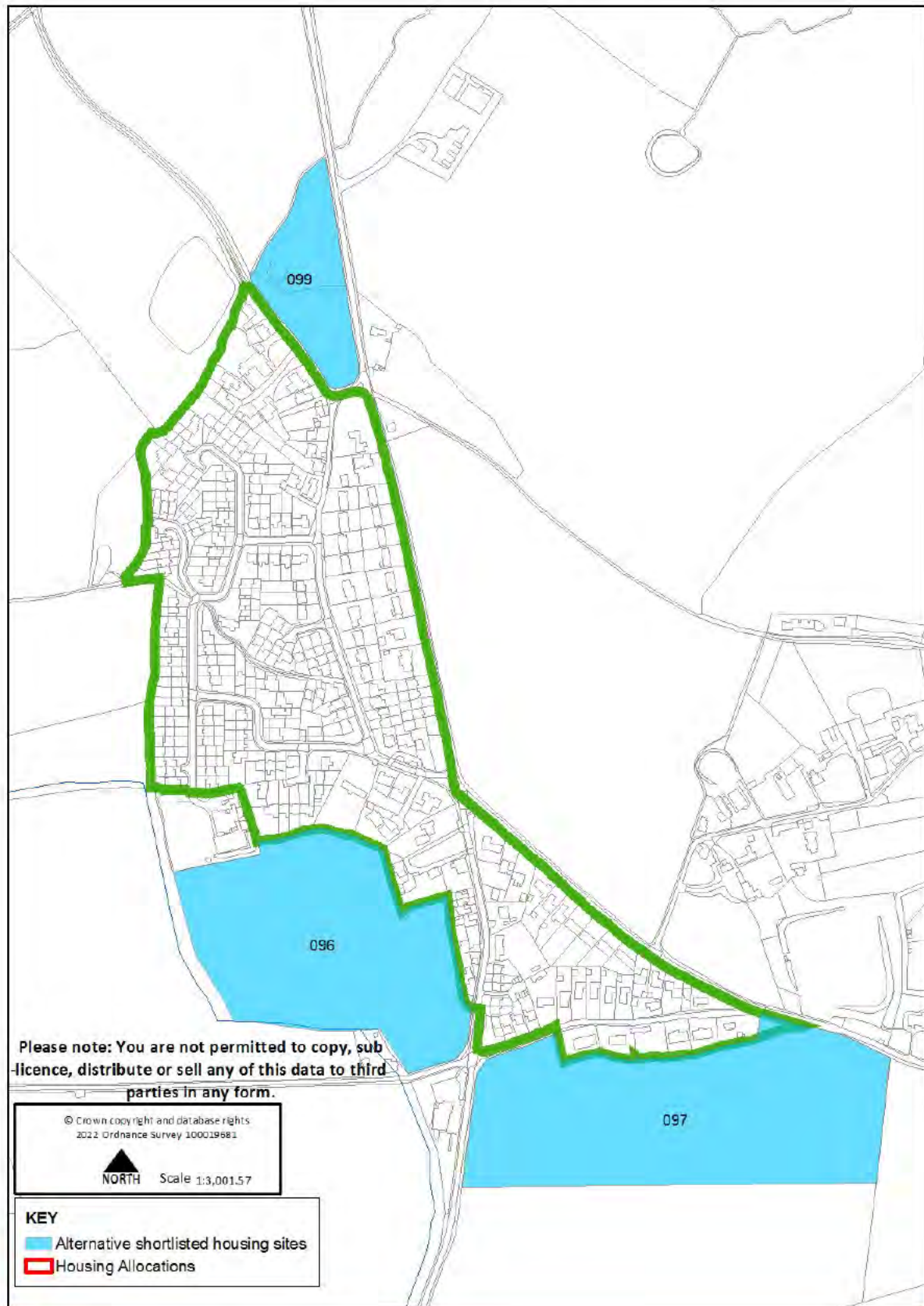
- 5.19.4 No large site suggestions with capacity to accommodate residential growth have been identified within the development boundary. Therefore, no development boundary locations are proposed for new housing allocations.

Reasons for lack of safeguarded land allocations

- 5.19.5 No safeguarded land exists adjacent to Bishops Wood village. Therefore, no safeguarded land locations are proposed for new housing allocations.

Reasons for lack of additional Green Belt allocations

- 5.19.6 Two of the three Green Belt site options are affected by constraints, specifically initial concerns from the Highways Authority and concerns regarding pedestrian connectivity. Current monitoring evidence also suggests that the Council can deliver 10% of its housing allocations on small sites in Tier 1-3 villages, without requiring additional allocations in less sustainable Tier 4 settlements. Therefore, none of the sites are considered to perform so well as to warrant a Green Belt allocation, although a small part of Site 096 may come forward as a rural exception site without being removed from the Green Belt, recognising the well advanced planning submission on this site.



5.20 Bobbington

- 5.20.1 Bobbington is a Tier 4 village in the Council's settlement hierarchy. The Council's preferred Spatial Housing Strategy, as previously set out in the Council's 2019 Spatial Housing Strategy and Infrastructure Delivery (SHSID), sought opportunities to deliver sites of up to 1 hectare at the District's Tier 4 villages, where suitable sites can be identified. At a strategic level, the limited level of growth in Tier 4 villages recognised the more limited level of facilities and public transport links in these settlements, but also that such settlements may also have a role in contributing to the requirement for 10% of new allocations on sites of 1 hectare or less and that limited development may support local infrastructure opportunities.
- 5.20.2 Existing planning permissions, existing housing allocations without planning permission and dwellings completed after 1 April 2018 in Bobbington can deliver approximately 3 dwellings during the plan period.
- 5.20.3 Summary conclusions from the site assessment process for housing allocations are set out below. The Council has had regard to the relative merits of all sites in selecting its preferred sites, which are summarised in full in the proformas set out in Appendix 3. The conclusions set out below are only intended as a narrative summary of key points and should be read alongside the full site assessment pro-formas and the wider evidence base that has informed the Council's site selection.

Reasons for development boundary allocations

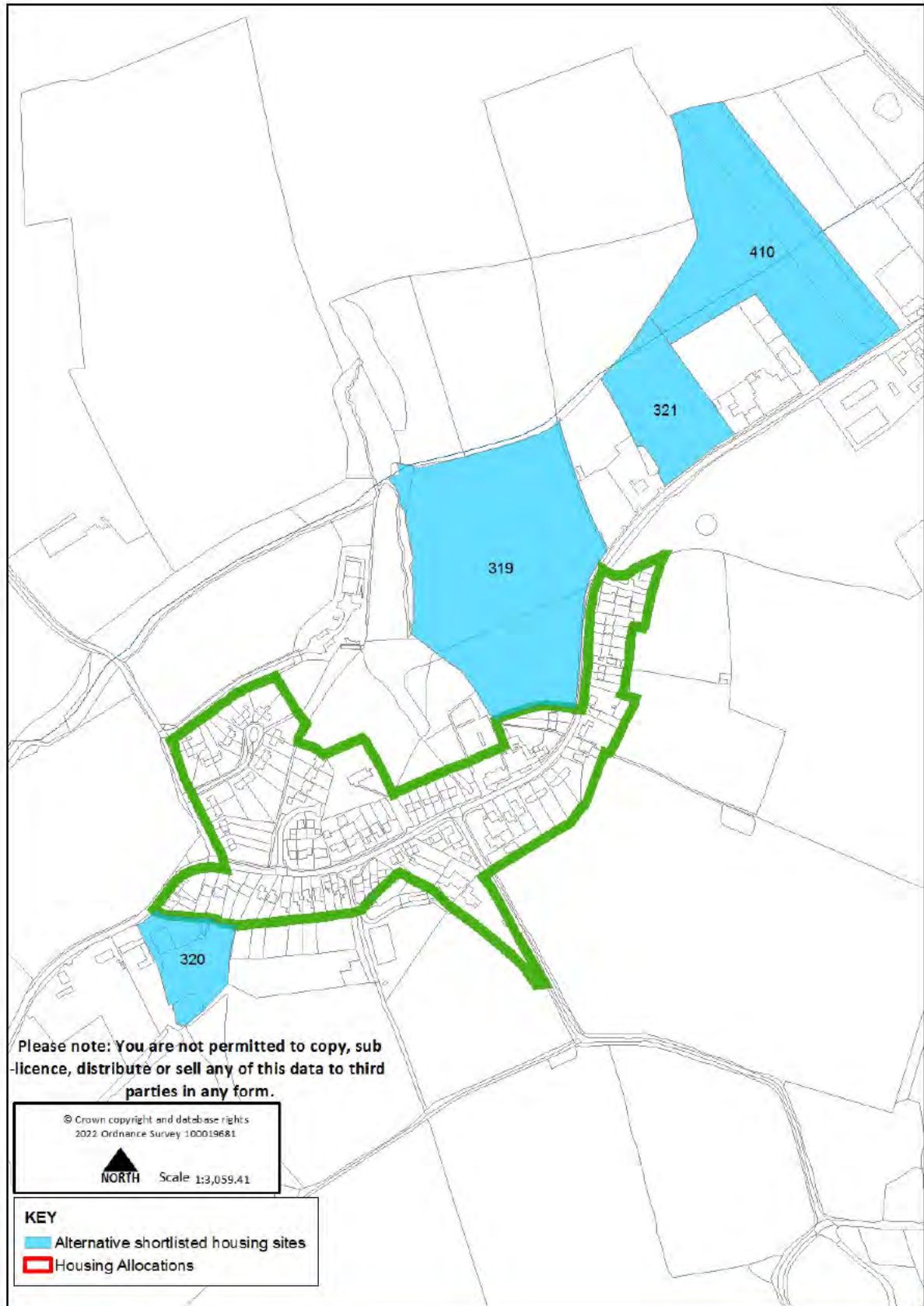
- 5.20.4 No large site suggestions with capacity to accommodate residential growth have been identified within the development boundary. Therefore, no development boundary locations are proposed for new housing allocations.

Reasons for lack of safeguarded land allocations

- 5.20.5 No safeguarded land exists adjacent to Bobbington village. Therefore, no safeguarded land locations are proposed for new housing allocations.

Reasons for lack of additional Green Belt allocations

- 5.20.6 All Green Belt site options are affected by constraints, specifically initial concerns from the Highways Authority and unmitigable major negative economy and employment impacts in the Sustainability Appraisal. Current monitoring evidence also suggests that the Council can deliver 10% of its housing allocations on small sites in Tier 1-3 villages, without requiring additional allocations in less sustainable Tier 4 settlements. Therefore, none of the sites are considered to perform so well as to warrant a Green Belt allocation.



5.21 Trysull

5.21.1 Trysull is a Tier 4 village in the Council's settlement hierarchy. The Council's preferred Spatial Housing Strategy, as previously set out in the Council's 2019 Spatial Housing Strategy and Infrastructure Delivery (SHSID), sought opportunities to deliver sites of up to 1 hectare at the District's Tier 4 villages, where suitable sites can be identified. At a strategic level, the limited level of growth in Tier 4 villages recognised the more limited level of facilities and public transport links in these settlements, but also that such settlements may also have a role in contributing to the requirement for 10% of new allocations on sites of 1 hectare or less and that limited development may support local infrastructure opportunities.

5.21.2 Existing planning permissions, existing housing allocations without planning permission and dwellings completed after 1 April 2018 in Trysull can deliver approximately 17 dwellings during the plan period. Key sites contributing towards this figure are set out in Table 14 below. Please note this table does not include all small planning permissions in and around this location, focusing on large sites only (10+ dwellings).

Table 14			
Site reference	Site address	Planning approval reference	Dwelling delivery 2018 - 2039
Existing planning permissions			
TS/93	The Plough Inn, School Road	19/00043/FUL	14

5.21.3 Summary conclusions from the site assessment process for housing allocations are set out below. The Council has had regard to the relative merits of all sites in selecting its preferred sites, which are summarised in full in the proformas set out in Appendix 3. The conclusions set out below are only intended as a narrative summary of key points and should be read alongside the full site assessment pro-formas and the wider evidence base that has informed the Council's site selection.

Reasons for development boundary allocations

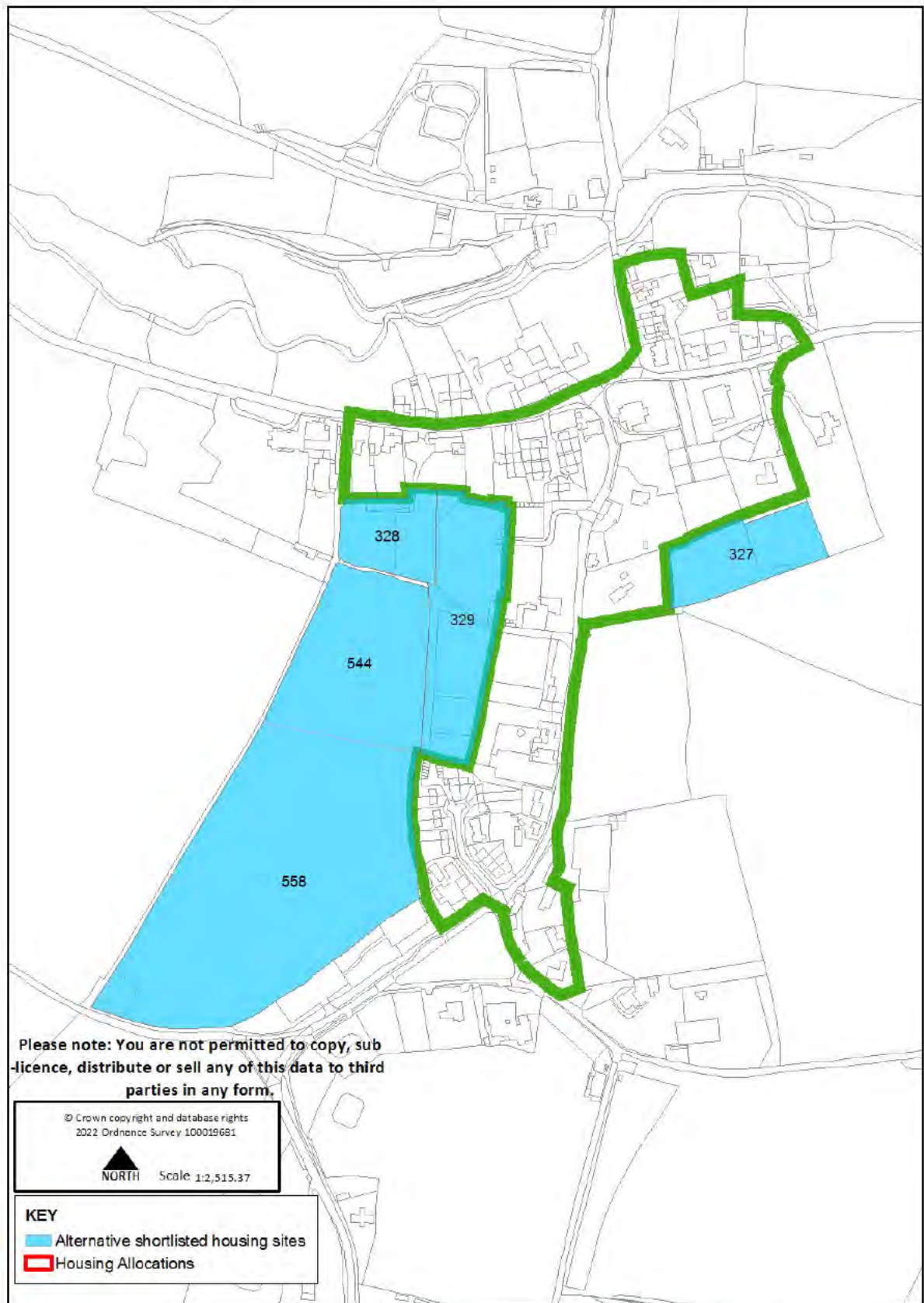
5.21.4 No large site suggestions with capacity to accommodate residential growth have been identified within the development boundary. Therefore, no development boundary locations are proposed for new housing allocations.

Reasons for lack of safeguarded land allocations

5.21.5 No safeguarded land exists adjacent to Trysull village. Therefore, no safeguarded land locations are proposed for new housing allocations.

Reasons for lack of additional Green Belt allocations

5.21.6 All Green Belt site options are affected by constraints, specifically initial concerns from the Highways Authority and unmitigable major negative employment impacts in the Sustainability Appraisal. Current monitoring evidence also suggests that the Council can deliver 10% of its housing allocations on small sites in Tier 1-3 villages, without requiring additional allocations in less sustainable Tier 4 settlements. Therefore, none of the sites are considered to perform so well as to warrant a Green Belt allocation.



5.22 Seisdon

- 5.22.1 Seisdon is a Tier 4 village in the Council's settlement hierarchy. The Council's preferred Spatial Housing Strategy, as previously set out in the Council's 2019 Spatial Housing Strategy and Infrastructure Delivery (SHSID), sought opportunities to deliver sites of up to 1 hectare at the District's Tier 4 villages, where suitable sites can be identified. At a strategic level, the limited level of growth in Tier 4 villages recognised the more limited level of facilities and public transport links in these settlements, but also that such settlements may also have a role in contributing to the requirement for 10% of new allocations on sites of 1 hectare or less and that limited development may support local infrastructure opportunities.
- 5.22.2 Existing planning permissions, existing housing allocations without planning permission and dwellings completed after 1 April 2018 in Seisdon can deliver approximately 5 dwellings during the plan period. Key sites contributing towards this figure are set out in Table 15 below. Please note this table does not include all small planning permissions in and around this location, focusing on large sites only (10+ dwellings).

Table 15			
Site reference	Site address	Planning approval reference	Dwelling delivery 2018 - 2039
Existing planning permissions			
TS/89	Lower Lanes Farm, Fox Road	13/01014/FUL	3*

**Full site capacity is 16 dwellings, but the majority of this was completed prior to 1st April 2018*

- 5.22.3 Summary conclusions from the site assessment process for housing allocations are set out below. The Council has had regard to the relative merits of all sites in selecting its preferred sites, which are summarised in full in the proformas set out in Appendix 3. The conclusions set out below are only intended as a narrative summary of key points and should be read alongside the full site assessment pro-formas and the wider evidence base that has informed the Council's site selection.

Reasons for development boundary allocations

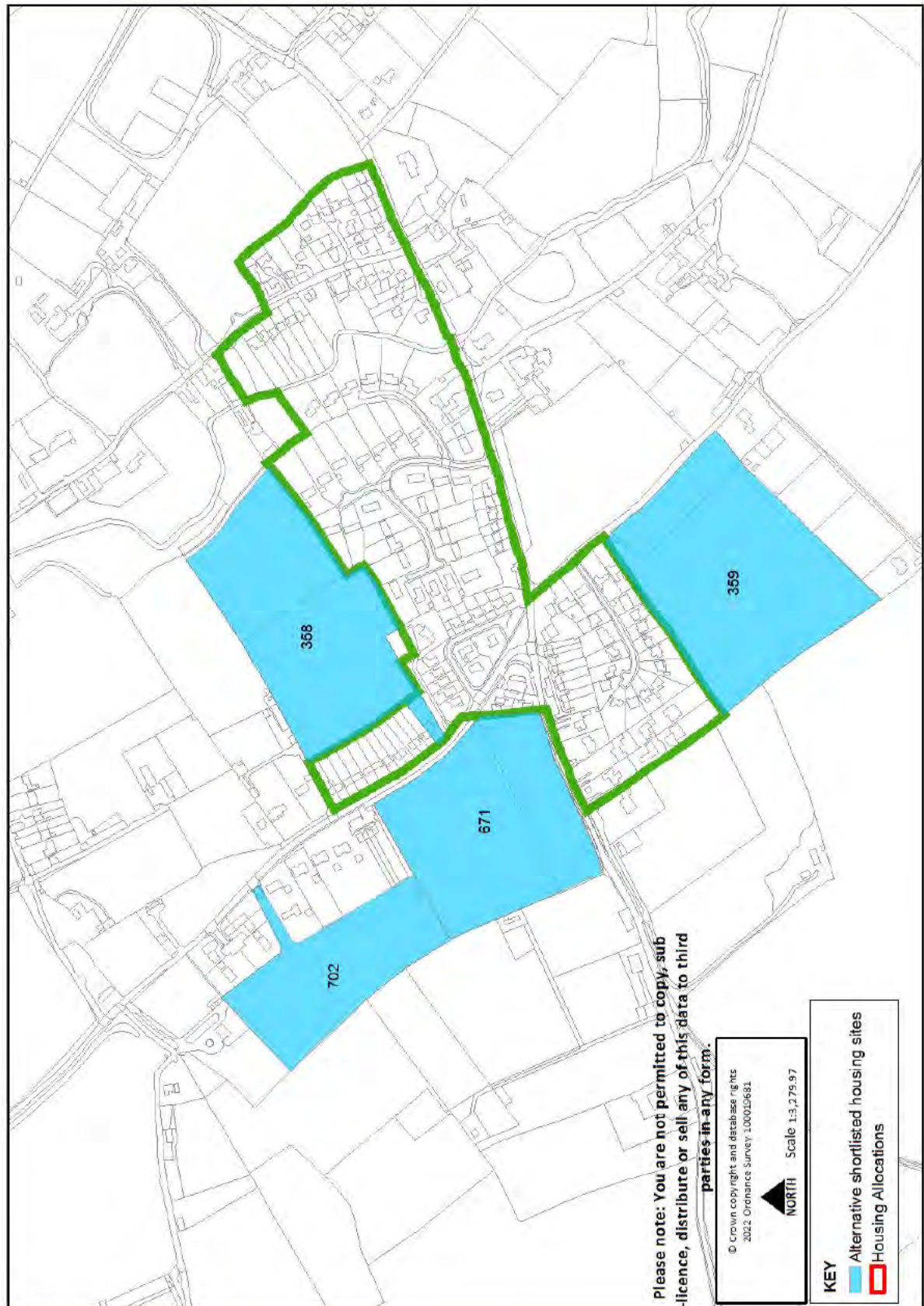
- 5.22.4 No large site suggestions with capacity to accommodate residential growth have been identified within the development boundary. Therefore, no development boundary locations are proposed for new housing allocations.

Reasons for lack of safeguarded land allocations

- 5.22.5 No safeguarded land exists adjacent to Seisdon village. Therefore, no safeguarded land locations are proposed for new housing allocations.

Reasons for lack of additional Green Belt allocations

- 5.22.6 All Green Belt site options are affected by constraints, specifically initial concerns from the Highways Authority and unmitigable major negative education impacts in the Sustainability Appraisal. Current monitoring evidence also suggests that the Council can deliver 10% of its housing allocations on small sites in Tier 1-3 villages, without requiring additional allocations in less sustainable Tier 4 settlements. Therefore, none of the sites are considered to perform so well as to warrant a Green Belt allocation.



5.23 Himley

- 5.23.1 Himley is a Tier 4 village in the Council's settlement hierarchy. The Council's preferred Spatial Housing Strategy, as previously set out in the Council's 2019 Spatial Housing Strategy and Infrastructure Delivery (SHSID), sought opportunities to deliver sites of up to 1 hectare at the District's Tier 4 villages, where suitable sites can be identified. At a strategic level, the limited level of growth in Tier 4 villages recognised the more limited level of facilities and public transport links in these settlements, but also that such settlements may also have a role in contributing to the requirement for 10% of new allocations on sites of 1 hectare or less and that limited development may support local infrastructure opportunities.
- 5.23.2 Existing planning permissions, existing housing allocations without planning permission and dwellings completed after 1 April 2018 in Himley can deliver approximately 3 dwellings during the plan period.
- 5.23.3 Summary conclusions from the site assessment process for housing allocations are set out below. The Council has had regard to the relative merits of all sites in selecting its preferred sites, which are summarised in full in the proformas set out in Appendix 3. The conclusions set out below are only intended as a narrative summary of key points and should be read alongside the full site assessment pro-formas and the wider evidence base that has informed the Council's site selection.

Reasons for development boundary allocations

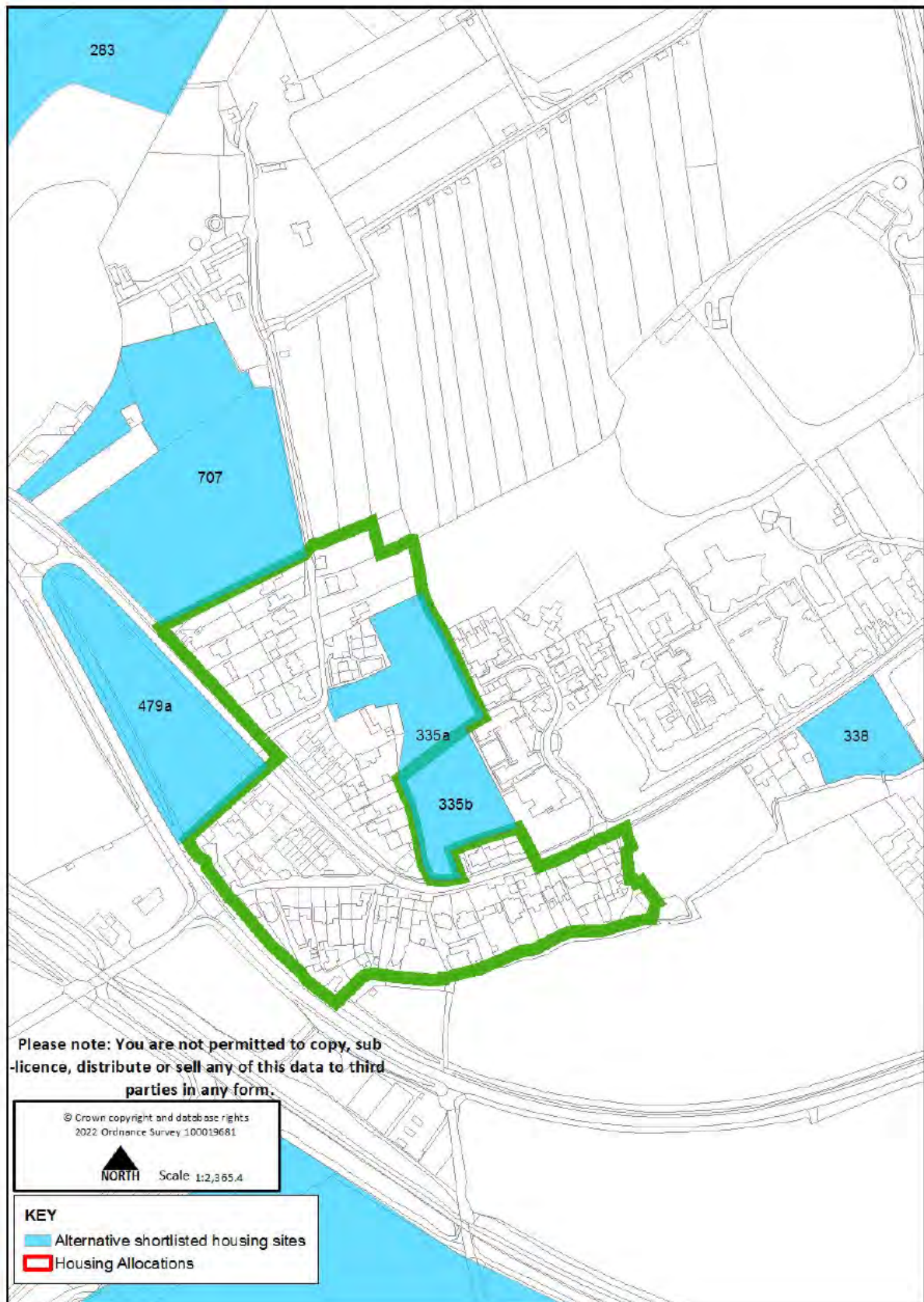
- 5.23.4 One site suggestion with capacity to accommodate residential growth has been identified within the development boundary of Himley (Site 335a). However, based on the initial views of the Highways Authority the site does not appear to have a suitable access and would also be predicted to result in unmitigable major negative effects in the Sustainability Appraisal if allocated. Therefore, on balance, the site is not proposed for a housing allocation.

Reasons for lack of safeguarded land allocations

- 5.23.5 No safeguarded land exists adjacent to Himley village. Therefore, no safeguarded land locations are proposed for new housing allocations.

Reasons for lack of additional Green Belt allocations

- 5.23.6 All Green Belt site options are affected by constraints, specifically initial concerns from the Highways Authority and unmitigable major negative education impacts in the Sustainability Appraisal. Current monitoring evidence also suggests that the Council can deliver 10% of its housing allocations on small sites in Tier 1-3 villages, without requiring additional allocations in less sustainable Tier 4 settlements. Therefore, none of the sites are considered to perform so well as to warrant a Green Belt allocation.



5.24 Northern Edge of the Black Country

- 5.24.1 The Council's preferred Spatial Housing Strategy, as set out in the Council's Local Plan Review – Publication Plan consultation, seeks to deliver a level of growth equivalent to two sustainable urban extensions over the plan period 2018 to 2039, with one of these being an employment-led development at Coven Heath west of ROF Featherstone.
- 5.24.2 At a strategic level, seeking to identify sustainable urban extensions adjacent to the Black Country's northern edge recognises a number of factors. This broad location includes large sections of land in close proximity to the Black Country's towns and cities, which generate much of the GHBMA's unmet needs. The area also provides options to deliver residential growth in areas with better access to services and employment in the adjacent Black Country's higher order settlements than many other areas within the District. There are also a significant number of large-scale site suggestions which could deliver housing alongside other uses in this area.
- 5.24.3 In addition to these more general benefits, the employment-led urban extension option west of ROF Featherstone also has the specific strategic benefits of being within the area of search 'North of Wolverhampton, in the vicinity of i54 South Staffordshire (M54, J2)', which was identified as a strategic recommendation for large-scale growth in the GBHMA Strategic Growth Study¹². It also aligns with the delivery of the Council's preferred access route to ROF Featherstone Strategic Employment Site and could deliver land to be safeguarded for a potential rail-based park and ride site, reflecting an existing Core Strategy policy priority¹³.
- 5.24.4 This broad location has not historically been suggested for growth by the Council in previous Local Plans. As such there are no large-scale (10+ dwelling) housing sites in this broad location and any new growth to deliver the preferred spatial strategy would have to be delivered through additional housing allocations.
- 5.24.5 Summary conclusions from the site assessment process for housing allocations are set out below. The Council has had regard to the relative merits of all sites in selecting its preferred sites, which are summarised in full in the proformas set out in Appendix 3. The conclusions set out below are only intended as a narrative summary of key points and should be read alongside the full site assessment pro-formas and the wider evidence base that has informed the Council's site selection.

Summary of proposed allocations along the Northern Edge of the Black Country

New development boundary sites and existing allocations being re-confirmed as suitable
- n/a

Allocations on existing safeguarded land
- n/a

New allocations Green Belt adjacent the Northern Edge of the Black Country
- **Site 646 a&b (Land at Cross Green)** – minimum delivery of approximately 1,200 dwellings
- **Site 486c (land off Linthouse Lane, Wednesfield)** – minimum delivery of approximately 1,200 dwellings during the plan period*

¹² Table 47 of the GBHMA Strategic Growth Study 2018

¹³ See Core Policy 11: Sustainable Transport in the 2012 South Staffordshire Core Strategy DPD

**1,200 dwelling figure reflects likely lead-in time and build rate of site, the full site could deliver around 776 additional dwellings beyond the end of the plan period*

- 5.24.6 To assist in explaining the Council's reasons for allocation narrative reasons for the selection of the sites are also summarised below. These should be read alongside the site assessment pro-formas in Appendix 3, which have been considered in full by the Council before reaching any decisions regarding new allocations.

Reasons for additional Green Belt allocations

- 5.24.7 The Council's site selection process has not revealed any additional deliverable non-Green Belt sites in this location. Given this and the potential for this broad location to deliver additional large-scale growth, it is clear that additional Green Belt release will be required in this broad location to realise the Council's preferred Spatial Housing Strategy. Having regard to the full site assessment findings for this broad location, as set out in Appendix 3, **Green Belt land in Site 646 a&b and Site 486c is considered the most appropriate option for delivering the Council's Spatial Housing Strategy.** Reasons for the selection of the sites are also summarised below.

Site 646 a&b (Land at Cross Green)

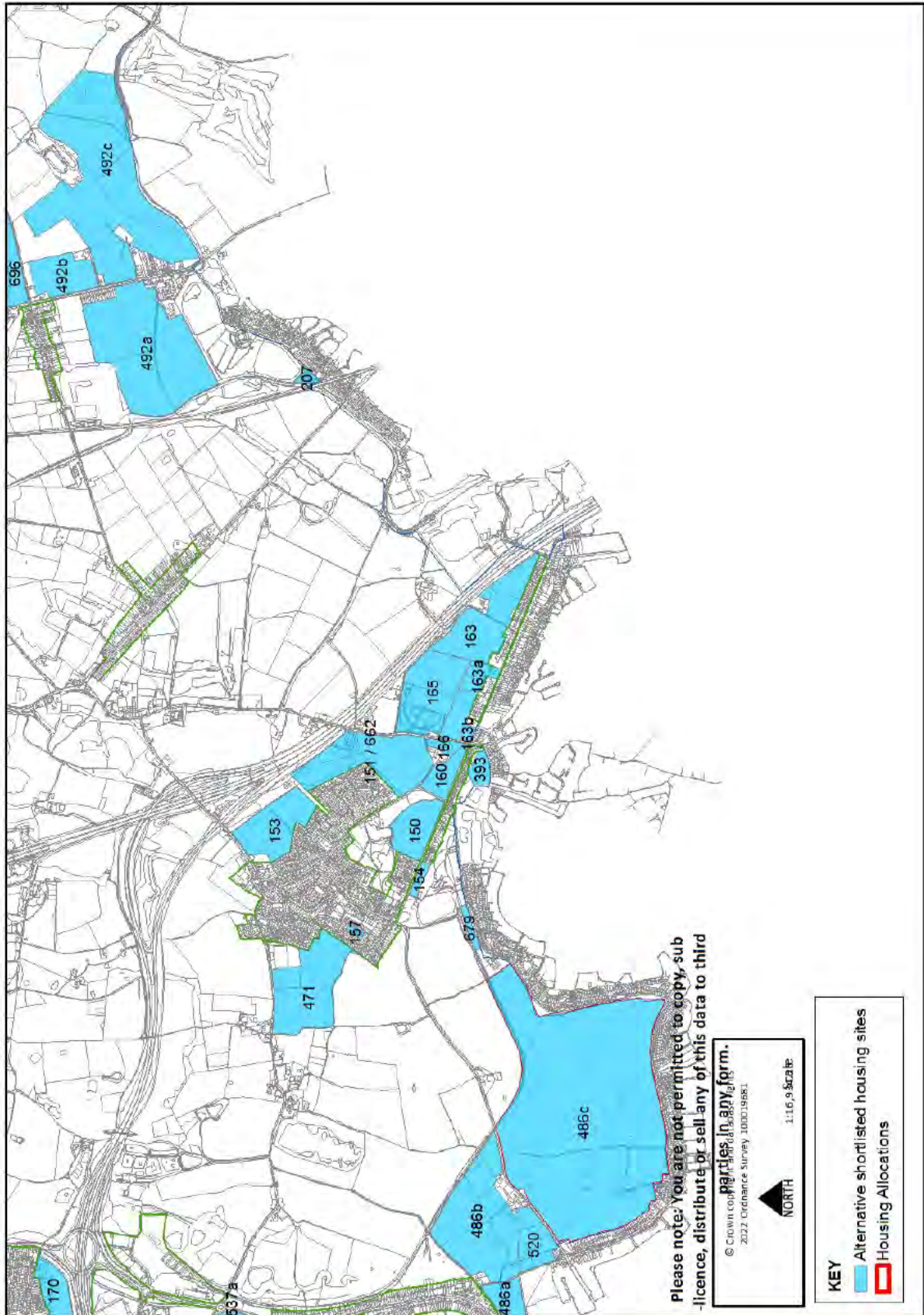
- 5.24.8 Site 646a&b is proposed for allocation to meet the Council's ambition to deliver employment-led growth to the west of ROF Featherstone. The site is on land that is a mixture of very high and high harm Green Belt, meaning part of the site is more sensitive than other sites North of the Black Country. There is an area of Flood Zones 2 and 3 running through the site, but the site appears capable of accommodating 1,200 dwellings without locating dwellings within these Flood Zones. The site is identified as being of moderate landscape sensitivity, which is a higher landscape sensitivity than other land along the northern edge of the Black Country.
- 5.24.9 Despite these increased sensitivities, the site offers a unique opportunity to align growth to the ROF and i54 strategic employment sites and the Council's preferred access route to ROF Featherstone, whilst delivering a mixed-use development with on-site retail and first/primary education facilities. The site is also considered the option which most closely aligns the Council's housing growth to the strategic recommendations of the GBHMA Strategic Growth Study, which recommended an employment-led housing growth on a mixed-use scheme, adjacent to, or in the vicinity of, junction 2 of the M54. The site may also deliver land to be safeguarded for a potential rail-based park and ride site, which is an adopted infrastructure requirement in South Staffordshire's existing Core Strategy.
- 5.24.10 Whilst there are numerous sites along the northern edge of the Black Country, only three others are considered to be large enough to accommodate a mixed use strategic housing development of a similar scale (Site 537 & 537a, Site 486c and Site 492a,b&c). None of them are considered better options to meet the requirement from the Council's preferred strategy for employment-led growth west of ROF Featherstone, nor are they considered to perform so markedly better to warrant a departure from this strategy. Site 537 & 537a has similar Green Belt harm but greater areas of landscape sensitivity and significant heritage concerns in the Historic Environment Site Assessment. Site 486c is of lesser Green Belt and landscape harm but does not align growth to the recommendation for an employment-led development in the GBHMA Strategic Growth Study. Site 492a,b&c has similar Green Belt

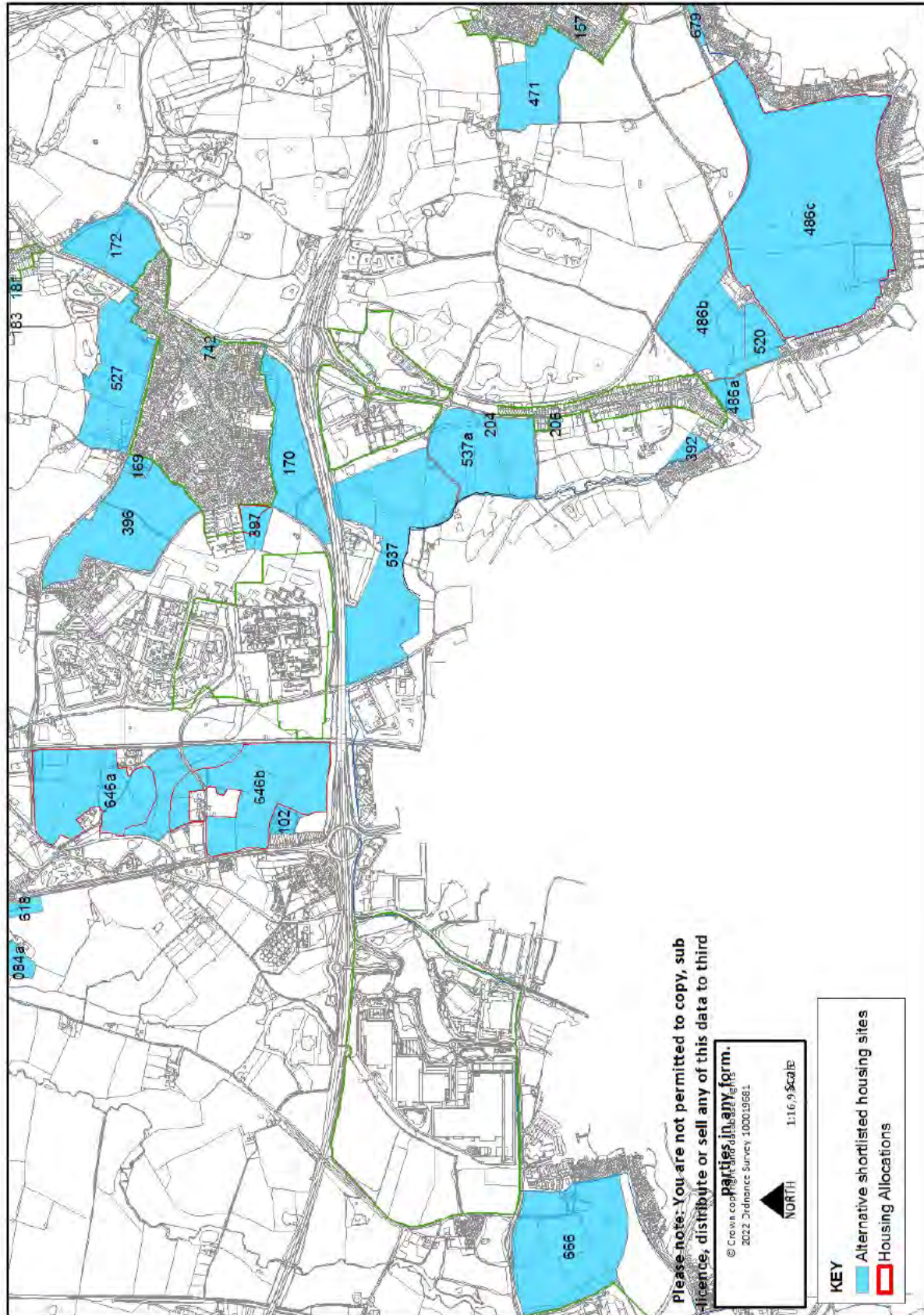
sensitivities (including areas of very high and high harm) and has areas of similar landscape sensitivity, but also fails to align growth to the recommendation for an employment-led development in the GBHMA Strategic Growth Study.

Site 486c (Land off Linthouse Lane, adjacent Wednesfield)

5.24.11 Site 486c is proposed for allocation to deliver the second mixed-use urban extension sought north of the Black Country. The site is entirely on land considered to be of high harm to the Green Belt, making it less harmful than other large scale site options adjacent to the northern edge of the Black Country (492a,b&c and Site 537 & 537a). The site is entirely within an area of moderate-low landscape sensitivity, which is also less sensitive than other large scale site options in this area. The site offers a chance to deliver a mixed-use scheme with on-site retail, local centres and primary education directly adjacent to the neighbouring city of Wolverhampton and in close proximity of nearby bus routes, aligning well with the Council's preferred strategy. Whilst another large scale option in this area (Site 492a,b&c) has similar bus access and is nearer to a rail link than the proposed site, it is still approximately 2.2km walk from the centre of the site to the nearest rail link along pedestrian footways.

5.24.12 The majority of other land adjacent to the north of the Black Country is also of similar Green Belt harm to Site 486c, with the exception of a cluster of smaller sites east of Essington. No land in this area is of lower landscape harm and a large number of the smaller sites in this area are affected but significant constraints (e.g. Highways Authority concerns, potential significant heritage impacts, major negative impacts on education in the Sustainability Appraisal). None of these smaller sites are considered capable of meeting the SHSID's aspiration for larger scale mixed-use urban extension north of the Black Country, nor are they considered to perform so markedly better to warrant a departure from this strategy.





5.25 Western Edge of the Black Country

- 5.25.1 The Council's preferred Spatial Housing Strategy, as set out in the Council's Local Plan Review – Publication Plan consultation, seeks to deliver an urban extension in the Green Belt along the Black Country's western edge. At a strategic level, this approach recognises this area's proximity to the Black Country's towns and cities (which generate much of the GHBMA's unmet needs) and the recommendations of the GBHMA Strategic Growth Study, which indicated this area could be a broad location capable of accommodating dispersed housing growth. However, unlike the northern edge of the Black Country, the broad location contains fewer options for large scale mixed-use urban extensions, contains greater areas of land that would cause both higher harm to the Green Belt and are of higher landscape sensitivity and has poorer access to employment via sustainable transport measures. Much of the land in this area is also adjacent to a Black Country authority with significant Green Belt opportunities within its own administrative area and a significantly smaller unmet need according to the latest Urban Capacity Review (Dudley). Given the need to release Green Belt only in exceptional circumstances, the Council is seeking an urban extension of a smaller scale in this broad location.
- 5.25.2 The western edge of the Black Country has not historically been suggested for growth by the Council in previous Local Plans. As such there are no large-scale (10+ dwelling) housing sites adjacent to the Black Country's western edge and any new growth to deliver the preferred spatial strategy would have to be delivered through additional housing allocations.
- 5.25.3 Summary conclusions from the site assessment process for housing allocations are set out below. The Council has had regard to the relative merits of all sites in selecting its preferred sites, which are summarised in full in the proformas set out in Appendix 3. The conclusions set out below are only intended as a narrative summary of key points and should be read alongside the full site assessment pro-formas and the wider evidence base that has informed the Council's site selection.

Summary of proposed allocations along the Western Edge of the Black Country

New development boundary sites and existing allocations being re-confirmed as suitable
- n/a

Allocations on existing safeguarded land
- n/a

New allocations Green Belt adjacent the Western Edge of the Black Country
- **Site 582 (Land off Langley Road)** – minimum delivery of approximately 390 dwellings

- 5.25.4 To assist in explaining the Council's reasons for allocation narrative reasons for the selection of the site is also summarised below. These should be read alongside the site assessment pro-formas in Appendix 3, which have been considered in full by the Council before reaching any decisions regarding new allocations.

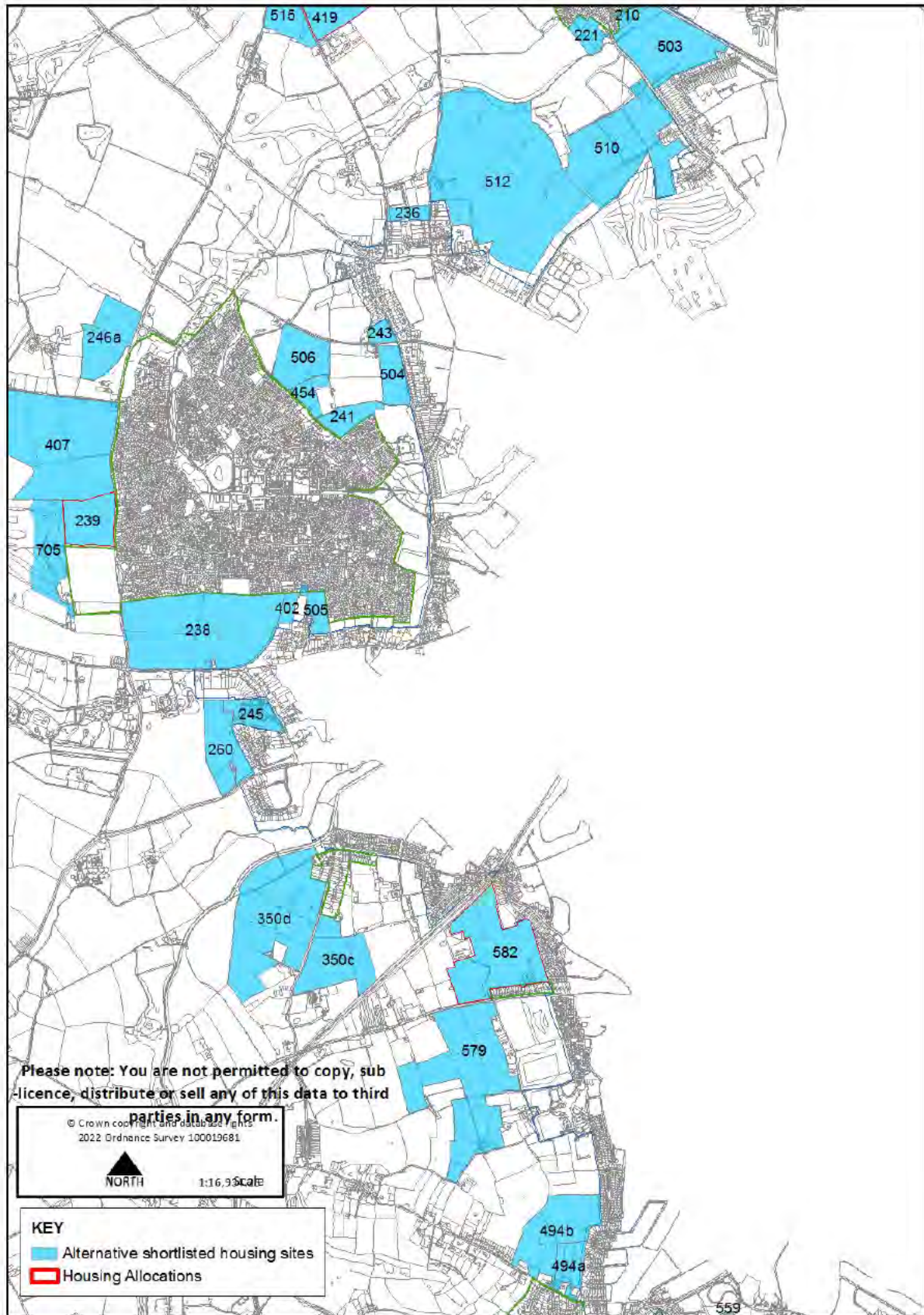
Reasons for additional Green Belt allocations

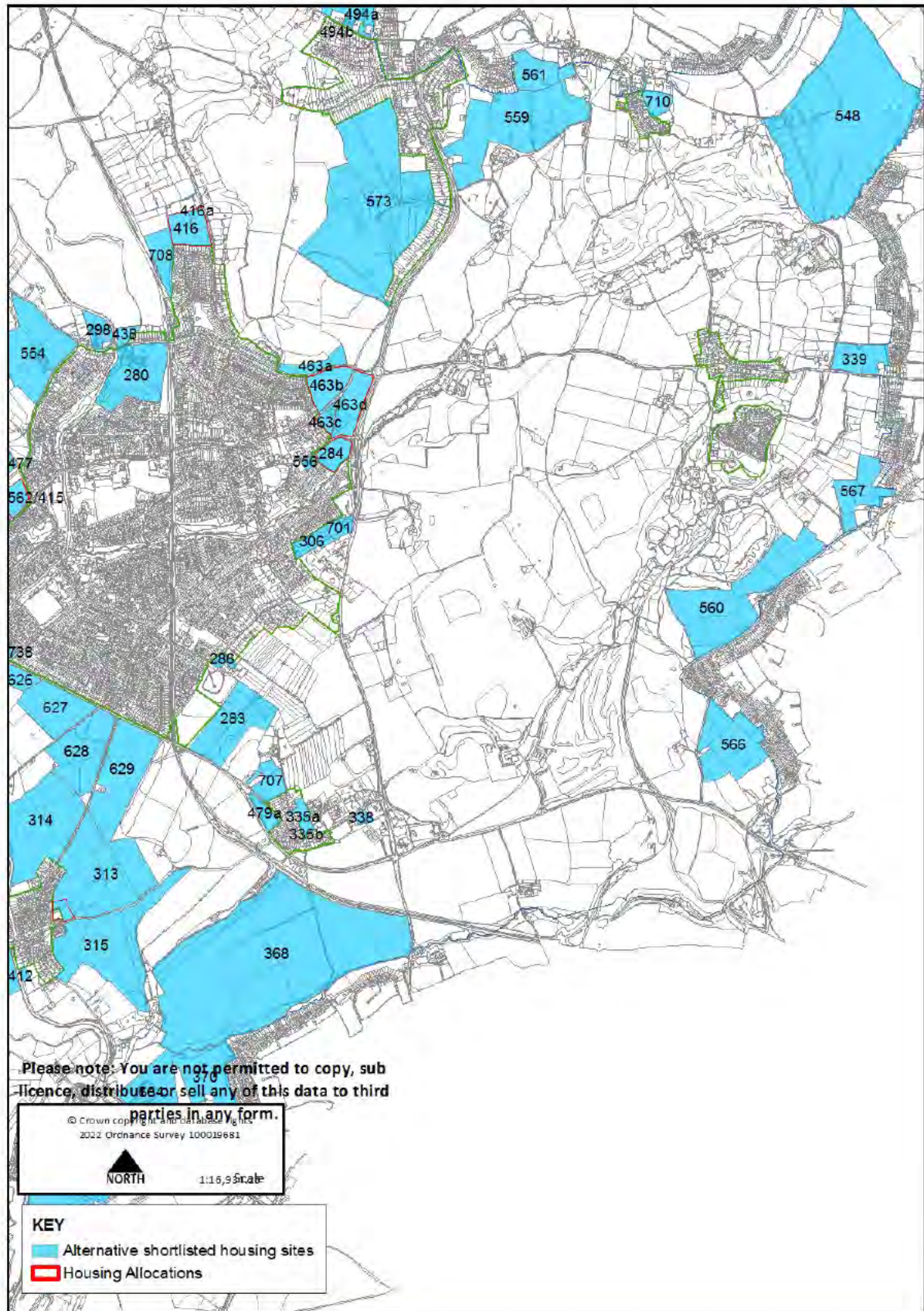
- 5.25.5 The Council's site selection process has not revealed any additional deliverable non-Green Belt sites in this location. Given this and the potential for this broad location to deliver

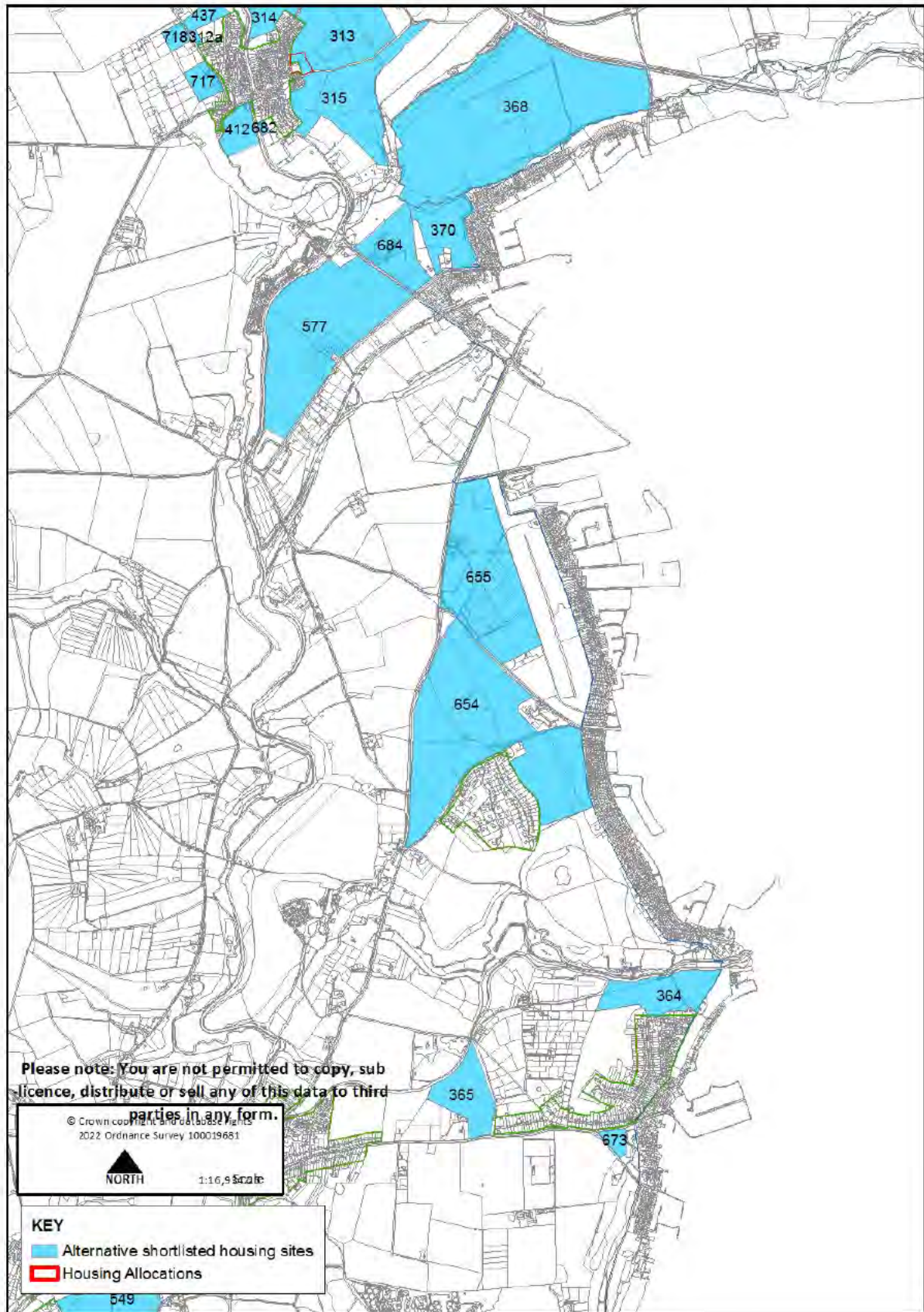
additional large-scale growth, it is clear that additional Green Belt release will be required in this broad location to realise the Council's preferred Spatial Housing Strategy. Having regard to the full site assessment findings in this broad location, as set out in Appendix 3, **Green Belt land in Site 582 is considered the most appropriate option for delivering the Council's Spatial Housing Strategy.** Reasons for the selection of the site are also summarised below.

Site 582 (Land off Langley Road)

- 5.25.6 The majority of Site 582 is in an area of lower Green Belt harm than the majority of other land adjacent to the western edge of the Black Country and the whole site is of similar landscape sensitivity to the majority of other land in this broad location. The site also raises a major positive effect against the Education criteria in the Sustainability Appraisal (SA), reflecting its close proximity to facilities in the Black Country urban area.
- 5.25.7 In contrast, many other sites in this broad location have a range of constraints. These include initial concerns raised from the Highways Authority, unmitigable major adverse education effects in the Sustainability Appraisal, significant heritage concerns in the Historic Environment Site Assessment, TPOs that may be affected by establishing site access or areas of both 'Very High' harm Green Belt and 'Moderate-High' sensitivity landscape. Numerous other sites also fail to score a major positive impact in the Sustainability Appraisal, unlike Site 582. Correspondence with the education authority also suggests that any further housing growth in the Codsall school cluster will create unmitigable capacity issues at middle schools in the Codsall/Bilbrook area.
- 5.25.8 There are other sites adjacent to the western edge of the Black Country that are free from these issues and, like Site 582, also score a major positive against the education criteria in the SA. None of these are considered to perform better than Site 582 when considering all factors in the round. Site 503 is entirely in high harm Green Belt land and would coalesce Wolverhampton with Bilbrook, whilst Site 510 is similarly entirely in high harm Green Belt land. Both sites are also in the Codsall school cluster and their allocation alongside other planned growth in that area could create unmitigable middle school capacity issues. Site 560 is within a similar area of Green Belt harm but is in an area of higher landscape sensitivity. Site 673 is also within a similar area of Green Belt harm and landscape sensitivity to Site 582 but unlike that site is adjacent to Dudley Metropolitan Borough which has a relatively limited unmet housing need and greater Green Belt opportunities within its own administrative area to address any unmet needs.
- 5.25.9 Given the above, none of these sites are considered to be a more appropriate option for accommodating housing growth adjacent to the western edge of the Black Country than Site 582.





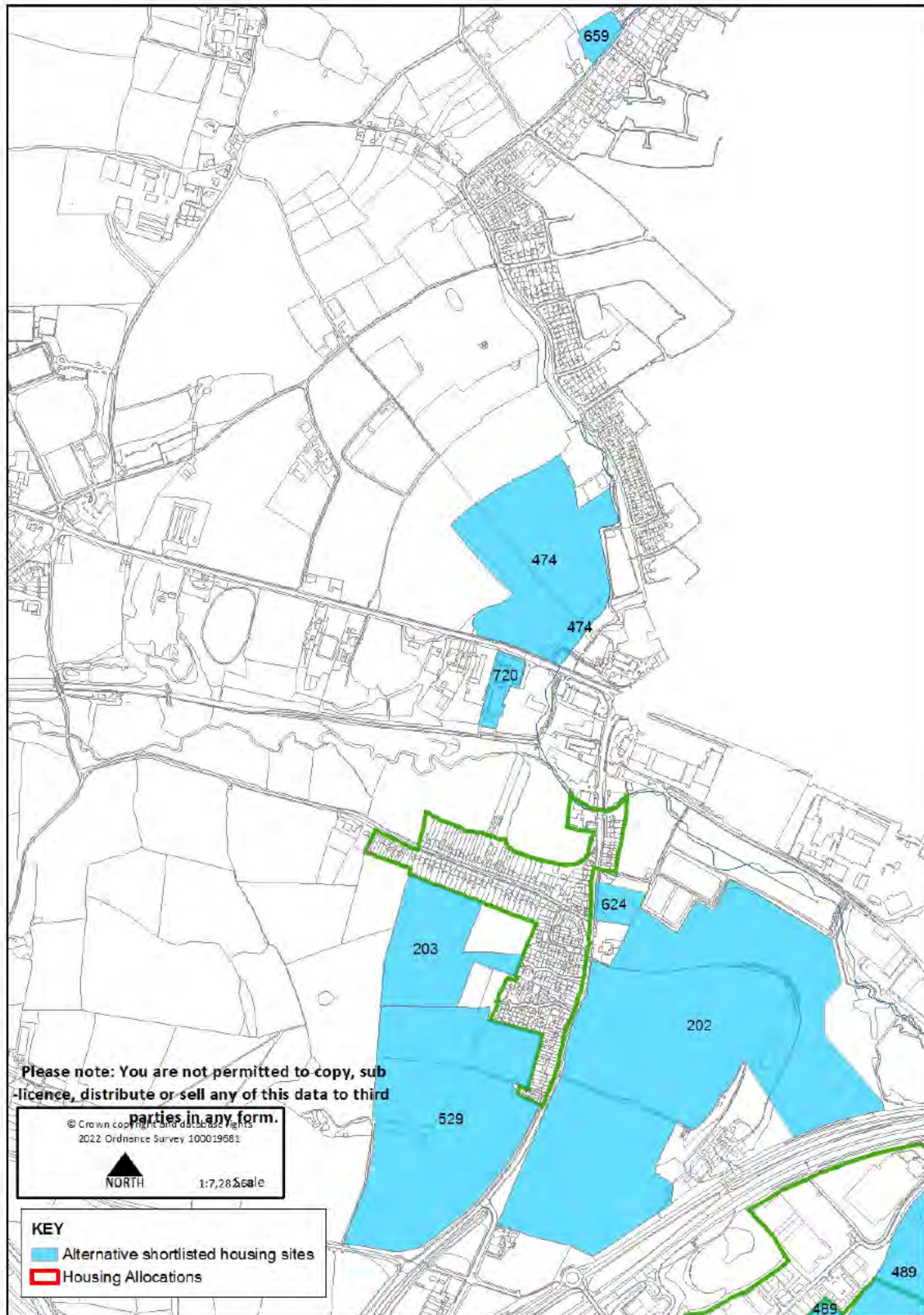


5.26 Cannock's Western Edge

- 5.26.1 The Council's preferred Spatial Housing Strategy, as set out in the Council's Local Plan Review – Publication Plan consultation, does not seek to deliver any additional growth in the Green Belt along Cannock town's edge. At a strategic level, the lack of growth in this broad location recognises the recommendations of the GBHMA Strategic Growth Study (did not identify this area as a strategic location for growth) and Cannock's lack of unmet housing need.
- 5.26.2 The western edge of Cannock has not historically been allocated for growth by the Council in previous Local Plans. As such there are no large-scale (10+ dwelling) housing sites in this area and any new growth to deliver the preferred spatial strategy would have to be delivered through additional housing allocations.
- 5.26.3 Summary conclusions from the site assessment process for housing allocations are set out below. The Council has had regard to the relative merits of all sites in selecting its preferred sites, which are summarised in full in the proformas set out in Appendix 3. The conclusions set out below are only intended as a narrative summary of key points and should be read alongside the full site assessment pro-formas and the wider evidence base that has informed the Council's site selection.

Reasons for lack of additional allocations

- 5.26.4 Most sites in this broad location are in some of the highest areas of Green Belt harm in the District ('very high' harm). In addition to this, a large number of sites are affected by constraints. These include unmitigable major negative education or landscape effects in the Sustainability Appraisal, due to many sites' distance from education facilities and land sitting within the AONB. There are also concerns from the Highways Authority regarding access or pedestrian connectivity and large amounts of land which would affect brick clay mineral safeguarding areas. Unlike some sites in growth locations next to other adjacent towns and cities, many of the sites are also relatively remote from services and facilities in the neighbouring town. Therefore, having considered all reasonable alternative sites on the western edge of Cannock, no site is considered to perform so well as to change the Council's preferred spatial housing strategy.



5.27 Southern Edge of Stafford

- 5.27.1 The Council's preferred Spatial Housing Strategy seeks to deliver a small urban extension in the Open Countryside along Stafford's southern edge. At a strategic level, this smaller level of growth balances the lack of Green Belt in this broad location against the recommendations of the GBHMA Strategic Growth Study (which discounted this broad location for large scale growth) and Stafford's lack of unmet housing need and separate housing market area. The southern edge of Stafford has not historically been allocated for growth by the Council in previous Local Plans. As such there are no large-scale (10+ dwelling) housing sites in this area and any new growth to deliver the preferred spatial strategy would have to be delivered through additional housing allocations.
- 5.27.2 Summary conclusions from the site assessment process for housing allocations are set out below. The Council has had regard to the relative merits of all sites in selecting its preferred sites, which are summarised in full in the proformas set out in Appendix 3. The conclusions set out below are only intended as a narrative summary of key points and should be read alongside the full site assessment pro-formas and the wider evidence base that has informed the Council's site selection.

Summary of proposed allocations along the Southern Edge of Stafford

New development boundary sites and existing allocations being re-confirmed as suitable
- n/a

Allocations on existing safeguarded land
- n/a

New allocations on Open Countryside land adjacent the Southern Edge of Stafford
- **Site 036c (Land at Weeping Cross)** – minimum delivery of approximately 81 dwellings

- 5.27.3 To assist in explaining the Council's reasons for allocation narrative reasons for the selection of the site is also summarised below. These should be read alongside the site assessment pro-formas in Appendix 3, which have been considered in full by the Council before reaching any decisions regarding new allocations.

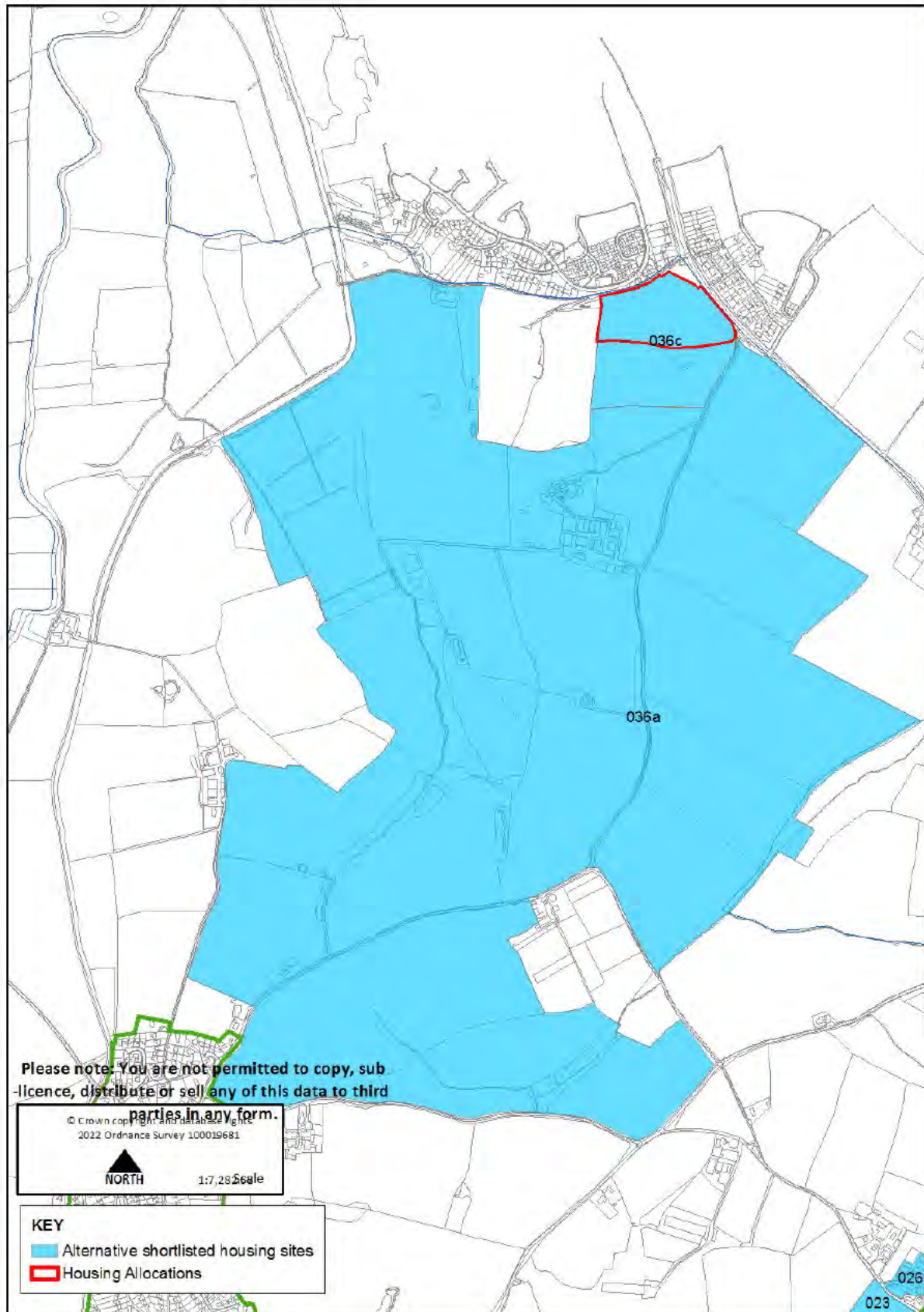
Reasons for additional Open Countryside allocations

- 5.27.4 The Council's site selection process has not revealed any additional deliverable non-Open Countryside sites in this location. Given this and the potential for this broad location to deliver additional growth, it is clear that additional Open Countryside release will be required in this broad location to realise the Council's preferred Spatial Housing Strategy. Having regard to the full site assessment findings in this broad location, as set out in Appendix 3, **Open Countryside land in Site 036c is considered the most appropriate option for delivering the Council's Spatial Housing Strategy.** Reasons for the selection of the sites are also summarised below.

Site 036c (Land at Weeping Cross)

- 5.27.5 Site 036c is an area of similar landscape sensitivity to wider land in this broad location, sitting in an area of 'high' sensitivity and the site's release is also assessed as having major

positive impacts against education, due to the site's proximity to local schools. Unlike the wider site suggestion in this broad location (Site 036a), the site is free from any Highways Authority concerns or any unmitigable major adverse impacts highlighted in the Sustainability Appraisal with regards to education. However, to ensure that no unmitigable significant effects are caused by the site, the Historic Environment Site Assessment (Stage 2) indicates that the allocation should be contained to the lower ground to the north of the site. This recommendation has been reflected in the final allocation boundary and the reduced site capacity figure for Site 036c.



5.28 New settlement area of search - A449/West Coast Mainline corridor between Wolverhampton and Stafford

- 5.28.1 The Council's previous 2019 Spatial Housing Strategy and Infrastructure Delivery (SHSID) consultation indicated that the Council would look for a freestanding new settlement along the transport corridor formed by the West Coast Mainline/A449. However, it did not propose to identify a site to assist in meeting the housing target set within the plan period, instead recognising that any such site would likely need to come forward through future Local Plan Reviews. This is reflected in the Council's preferred Spatial Housing Strategy, as set out in Section 4 of the Council's Local Plan Review – Preferred Options consultation, which identifies an area of search for a new settlement to deliver growth beyond the plan period (i.e. beyond 2039).
- 5.28.2 At a strategic level, this approach primarily reflects the findings of the GBHMA Strategic Growth Study. This study identified two areas of search¹⁴ for a new settlement along the A449/West Coast Mainline corridor, recognising the potential of the strategic road network and rail links to support new development in this area. However, despite identifying this area of search, the study assessed these strategic locations as being less suitable for accommodating housing growth than other strategic options within the District and wider HMA and did not recommend they were taken forward. The previous 2019 SHSID consultation also recognised that there was limited evidence that these locations were capable of delivering effective public transport infrastructure or secondary/high school provision due to the size of the current freestanding site suggestions within the area of search.
- 5.28.3 At a site-specific level, it is still necessary to test the potential deliverability of a new settlement proposal as an alternative location for housing growth in the District, as a check on the Council's preferred spatial strategy and the strategic regional evidence offered by the GBHMA Strategic Growth Study. Summary conclusions from the site assessment process for housing allocations are set out below. The Council has had regard to the relative merits of all sites in selecting its preferred sites, which are summarised in full in the proformas set out in Appendix 3. The conclusions set out below are only intended as a summary of key points and should be read alongside the full site assessment pro-formas and the wider evidence base that has informed the Council's site selection.

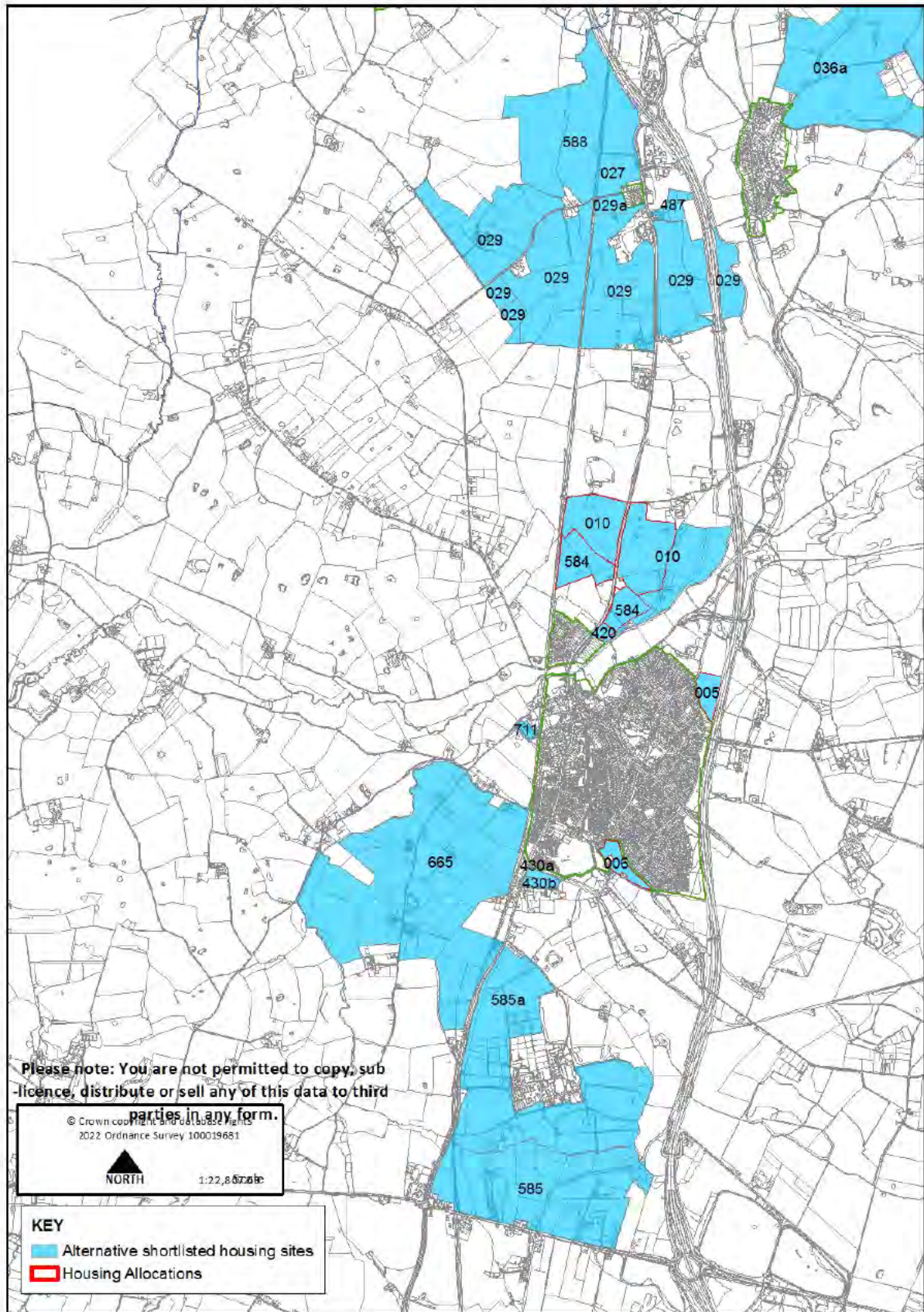
Reasons for lack of additional allocations

- 5.28.4 Three of the four sites in this broad location lie within areas of high Green Belt harm to the south of Penkridge. The remaining site lies to the north of Dunston in the Open Countryside. All sites are subject to Highways Authority concerns, due to the feasibility of establishing multiple accesses and potential impacts on junctions in the surrounding highways network. All of the potential sites are either not directly adjacent to an existing settlement's higher order services and facilities or have poor access to them (in the case of Site 665). Despite their proximity to the West Coast Main Line, none of the submitted site suggestions are in a location with a recognised rail opportunity, nor have any of the proposals submitted evidence to demonstrate that a new rail link would be feasible within their land control. Equally, none of the potential site options are of sufficient size to deliver the scale of growth envisaged by the GBHMA Strategic Growth Study in this corridor, which also means that no

¹⁴ 'Between Wolverhampton and Penkridge' and 'Around Dunston'

site is likely to accommodate significant on-site facilities beyond local retail centres and primary/first education facilities.

- 5.28.5 Given the above factors and the wider site assessment findings set out in the site proformas, no potential new settlement site in this broad location is considered to perform so well as to change the Council's preferred spatial housing strategy. This strategy instead focuses larger scale sites in locations adjacent to Tier 1 settlements or the Black Country urban area, allowing greater access to the higher order facilities in those locations and providing for housing needs in closer proximity to adjacent authorities with unmet housing needs.



5.29 Tier 5 settlements and the wider rural area

- 5.29.1 The Council's preferred Spatial Housing Strategy, as set out in Section 4 of the Council's Local Plan Review – Preferred Options consultation, does not seek to allocate new housing sites for additional growth in the District's least sustainable settlements (Tier 5 settlements) or isolated parts of the wider rural area. This recognises the District's settlement hierarchy, as set out in the Rural Services and Facilities Audit 2021, which identifies a lack of suitable facilities to support communities in such locations
- 5.29.2 Given this context, new site suggestions for allocation in such areas have not been assessed, as set out in paragraph 2.6 of this paper. However, small scale planning permissions which have already been granted under existing planning policies will contribute towards the District's land supply. These sources are currently estimated to provide around 293 dwellings towards supply during the plan period (2018 – 2039), primarily on small scale planning permissions. For completeness, planning permissions which make up this source of supply are set out in Appendix 4 of this document.

APPENDICES 1-3 Published separately

- 1. Sites discounted due to Spatial Strategy (Tier 5/New Settlement) and site size threshold**
- 2. Highways Authority Comments**
- 3. Site proformas**

Appendix 2 Green Belt Exceptional Circumstances Topic Paper (2022)

Green Belt
Exceptional Circumstances
Topic Paper
November 2022

EVIDENCE BASE DOCUMENT
DRAFT LOCAL PLAN REVIEW 2018-2039
(Regulation 19)

Contents

1 Introduction

2 Policy Background

3 Exceptional Circumstances – Strategic Considerations

4 Exceptional Circumstances – Site-specific Considerations

5 West Midlands Interchange

1. Introduction

- 1.1. This Topic Paper forms part of the evidence base for South Staffordshire District Council's new Local Plan for the period 2018 – 2039. It has been produced to support the Plan process and seeks to justify and outline the exceptional circumstances for the release of Green Belt land for housing, as well as for the West Midlands Interchange which has been approved through the Development Consent Order (DCO) process.
- 1.2. In South Staffordshire around 80% of the district is designated as Green Belt, which has broadly prevented the outward spread of the West Midlands conurbation to the northwest. The 20% of the district's countryside which is not designated as Green Belt is concentrated in the north of the district.
- 1.3. Due to this, the district has previously removed and allocated sites within the Green Belt through the Local Plan process to meet its housing needs. This included through the 1996 Local Plan and more recently through the 2018 Site Allocations DPD, several which are being carried forward to this Plan. It is therefore unsurprising that a similar approach is required as part of this review of the Local Plan and that additional sites within the Green Belt are required to meet the districts housing need (and contributions to other authorities' unmet needs) up until 2039.
- 1.4. Section 2 of this Topic Paper sets out the policy background. Section 3 sets out the overall exceptional circumstances case for Green Belt release in the district with section 4 focusing on the specific sites proposed for allocation. Section 5 then provides details of the West Midlands Interchange proposal which has been granted through the Development Consent Order (DCO) process.
- 1.5. This Topic Paper should be read alongside other evidence base documents such as the Housing Site Assessment Topic Paper (2022), Economic Strategy and Employment Sites Topic Paper (2022), Duty to Cooperate Topic Paper (2022) Strategic Housing and Economic Land Availability Assessment (2022) and the South Staffordshire Green Belt Study (2019). In addition, the Issues and Options consultation 2018, Spatial Housing Strategy and Infrastructure Delivery consultation 2019 and the Preferred Options consultation 2021 are all relevant and provide background to the Council's exceptional circumstances case.

2. Policy Background

- 2.1. National planning policy, including Green Belt policy, is primarily set out in the National Planning Policy Framework 2021 (NPPF), the Planning Policy for Traveller Sites 2015 and the national Planning Practice Guidance.
- 2.2. At the heart of the NPPF is a presumption in favour of sustainable development (paragraph 11). There are three pillars of sustainable development: economic, social and environmental matters. Paragraph 11 states that for plan-making this means that:

a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change

b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas¹, unless:

i the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area²; or

ii any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

- 2.3. The NPPF also makes clear the importance attached to the Green Belt. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open, and its essential characteristics are its openness and permanence (paragraph 137). National policy makes provision for alterations to the Green Belt and its boundary, be it by releasing land or by inseting settlements as detailed in paragraphs 140 to 144 of the NPPF. It is only through the preparation or review of Local Plans that boundaries of the Green Belt can be changed and this can only be done in exceptional circumstances.

- 2.4. Paragraph 140 of the NPPF sets out that:

“Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.”

- 2.5. The 2021 NPPF (paragraph 141) sets out the process that should occur before determining that exceptional circumstances exist:

“Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:

a) makes as much use as possible of suitable brownfield sites and underutilised land;

¹ As established through statements of common ground

² The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 181) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 63); and areas at risk of flooding or coastal change

b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and

c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground". (NPPF paragraph 141).

2.6. Paragraph 142 of the NPPF states:

'When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policymaking authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land'.

2.7. Whilst neither the NPPF nor NPPG provide guidance on how to undertake Green Belt reviews, the Planning Advisory Service (PAS) has published an advice note that discusses some of the key issues associated with assessing Green Belt.

2.8. The PAS Guidance³ considers the way in which the five purposes of Green Belt should be addressed, as follows:

- *Purpose 1: To Check the Unrestricted Sprawl of large built-up areas – this should consider the meaning of the term 'sprawl' and how this has changed from the 1930s when Green Belt was conceived.*
- *Purpose 2: To Prevent Neighbouring Towns from merging into one another – assessment of this purpose will be different in each case and a 'scale rule' approach should be avoided. The identity of a settlement is not determined just by the distance to another settlement; instead the character of the place and the land between settlements must be acknowledged.*
- *Purpose 3: To assist in safeguarding the countryside from encroachment – the most useful approach for this purpose is to look at the difference between the urban fringe and open countryside. As all Green Belt has a role in achieving this purpose, it is difficult to apply this purpose and distinguish the contribution of different areas.*
- *Purpose 4: Preserving the Setting and Special Character of Historic Towns – this applies to very few places within the country and very few settlements in practice. In most towns, there is already more recent development between the historic core and the countryside.*

³ <https://www.local.gov.uk/sites/default/files/documents/green-belt-244.pdf>

- *Purpose 5: To assist in urban regeneration by encouraging the recycling of derelict and other urban land – the amount of land within urban areas that could be developed will already have been factored in before identifying Green Belt land. The value of various land parcels is unlikely to be distinguished by the application of this purpose.*

2.9. Further relevant guidance and case law can be found within Section 2 of the South Staffordshire Green Belt Study⁴ dated July 2019.

3. Exceptional Circumstances – Strategic Considerations

Housing Need

- 3.1. As set out within the emerging Local Plan, the Plan seeks to promote the minimum delivery of 9,089 homes over the period 2018-2039 to meet the district's housing target, whilst providing approximately 13% additional homes to ensure plan flexibility.
- 3.2. The district's future housing need is calculated at 5,089 dwellings across the plan period using the government's standard method. Taking into account the 992 dwellings already delivered in the district between 2018-2022, this currently requires the district to deliver a minimum annual average of 241 dwellings per annum, starting from the current year (2022) and running to the end of the plan period (2039).
- 3.3. In addition to the district's own housing needs, there is emerging evidence of unmet needs from the wider Great Birmingham and Black Country Housing Market Area (GBBCHMA), within which South Staffordshire sits. The two most significant sources of potential unmet needs are currently Birmingham City and the Black Country authorities. The adopted Birmingham Development Plan and emerging urban capacity evidence from Birmingham and the Black Country suggests that a significant unmet need is arising across the GBBCHMA, driven by limited housing land in these urban areas.
- 3.4. Recognising the existing and emerging shortfalls, the GBBCHMA local authorities⁵ jointly prepared the GBBCHMA Strategic Growth Study in 2018. This drew together existing evidence on housing supply and need across the entire housing market area, estimating that at that time the unmet needs of the GBBCHMA sat at around 28,000 dwellings up to 2031, rising to nearly 61,000 dwellings by 2036.
- 3.5. In light of these unmet needs, the study recommended a series of strategic growth locations across the housing market area, including a number of locations in South Staffordshire, many of which were within the Green Belt. Using this evidence, it was proposed to test a contribution of 4,000 dwellings to the unmet housing needs of the GBBCHMA in the council's Local Plan review. This amount was based on the scale of growth implied in the district by the

⁴ <https://www.sstaffs.gov.uk/planning/local-plan-review-3.cfm>

⁵ Cannock Chase District Council, Wolverhampton City Council, Dudley Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Walsall Metropolitan Borough Council, Tamworth Borough Council, Birmingham City Council, South Staffordshire District Council, North Warwickshire District Council, Redditch Borough Council, Lichfield District Council, Bromsgrove District Council, Solihull Metropolitan Borough Council and Stratford on Avon District Council.

four strategic locations identified in South Staffordshire within the GBBCHMA Strategic Growth Study, three of which were in Green Belt locations. The GBBCHMA Strategic Growth Study concluded that if the recommended locations (in South Staffordshire and elsewhere within the GBBCHMA) were taken forward the GBBCHMA's shortfall could theoretically be met⁶. Alternative levels of growth have also been tested through the Sustainability Appraisal process. The district's proposed contribution to wider unmet housing needs was initially proposed in the previous 2018 Issues and Options consultation. This was done to ensure that the level of growth capable of being accommodated in South Staffordshire was based on a consistent HMA evidence base that consistently considered the sustainability, deliverability and infrastructure of strategic locations across the GBBCHMA (i.e. the GBBCHMA Strategic Growth Study). It also ensured that the issue of unmet housing needs was considered from the earliest stage possible in the plan's preparation and to provide Duty to Cooperate partners with the chance to comment on the approach from the earliest stage of the plan-making process.

- 3.6. Since it was proposed to accommodate this level of growth in 2018, updated land supply statements produced by the GBBCHMA local authorities have indicated the extent of the housing shortfall up to 2031 appears to have fallen significantly, primarily due to additional urban capacity being identified within Birmingham's local authority area, whilst also indicating that the Black Country's urban capacity evidence shows a significant level of housing need arising into the later 2030s⁷. However, in October 2022 Birmingham City Council started the process of agreeing an Issues and Options consultation for their new Local Plan which includes an early indication of a 78,415 home and 73.6ha employment land shortfall. These figures are based on current land availability before considering potential Green Belt release in Birmingham, but even if additional land supply can be identified, it is still likely that a significant shortfall from Birmingham will remain. At this point, the GBBCHMA Strategic Growth Study has not been updated to reflect these changing and emerging shortfalls, though South Staffordshire has led on a Statement of Common Ground across the GBBCHMA and related authorities to agree a broad work programme and governance structure to update to this piece of work and implement any new recommendations.
- 3.7. Reflecting these issues, South Staffordshire is proposing to plan for a housing target of 9,089 dwellings between 2018 and 2039. This will allow the district to meet its own housing needs over the plan period, whilst also making a proportionate and justified contribution to the unmet needs of the GBBCHMA. There is clearly some uncertainty around the exact extent of housing shortfalls within the GBBCHMA at this point in time, given the dated nature of the last examined plan to establish a shortfall⁸. However, the most recent urban capacity evidence from Birmingham and the Black Country suggests that it is highly unlikely that shortfalls will fall significantly below the levels set out in the 2018 Strategic Growth Study, particularly in the period beyond 2031. Therefore, the District has proposed to continue with its housing target of 9,089 dwellings between 2018 and 2039, which includes the 4,000 dwelling contribution to HMA unmet needs. As this 4,000 dwelling contribution is based upon the recommendations

⁶ Paragraph 10.48 of the GBBCHMA Strategic Growth Study 2018

⁷ Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Housing Need and Housing Land Supply Position Statement (July 2020)

⁸ 2017 Birmingham Development Plan

for Green Belt release in the 2018 Strategic Growth Study, it is highly likely to require Green Belt release to be met.

Spatial Strategy for Housing

3.8. To consider how this level of housing growth could be accommodated, the district previously consulted on a Spatial Housing Strategy and Infrastructure Delivery (SHSID) consultation in October 2019. This looked at how the proposed housing target (i.e. the district's own needs + 4,000 to HMA unmet needs) could be distributed between different settlements and other broad locations within the district. It set out 7 Spatial Housing Options being considered by the Council as reasonable alternatives for the distribution of new housing growth in the Local Plan review. In forming and assessing these spatial strategy options the Council considered a number of factors⁹ including:

- The level of Green Belt harm of land options to address each strategy, as set out in the Green Belt Study 2019
- Conformity with the GBBCHMA Strategic Growth Study findings
- Access to employment centres and jobs
- Local housing need indicators
- Flood risk, natural and historic environment constraints
- Conformity with spatial options tested in the Sustainability Appraisal – Issues and Options 2018

3.9. Spatial Housing Strategy Option A: 'Maximise Open Countryside release' considered a strategy of meeting the districts housing need through directing development away from the Green Belt. In summary, this option involved 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).

3.10. Under Option A, even if all non-Green Belt land supply options could be maximised and had no deliverability issues the district would only deliver approximately 7,876 dwellings within the plan period, falling short of the preferred housing target. This strategy would also include significant development at relatively unsustainable tier 3 (Wheaton Aston) and tier 4 (Dunston) settlements. There were also a number of other disadvantages associated with this spatial strategy as set out in the document and the Sustainability Appraisal recognised that all of the best performing spatial strategies (Options D-G) involved growth in locations which required Green Belt release.

3.11. The report concluded that Spatial Housing Strategy Option G 'Infrastructure-led development with a garden village area of search beyond the plan period' would be the most appropriate for South Staffordshire. This strategy prioritises growth on strategic sites in locations where it could help to meet local infrastructure needs and opportunities, with smaller allocations being

⁹ See South Staffordshire Council Local Plan Review - Spatial Housing Strategy & Infrastructure Delivery October 2019 - Appendix 5: Policy and Physical Constraints Paper

made in other broad locations having regard to their local environmental constraints. 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. It was acknowledged that Option G would require Green Belt release to deliver the strategy but it still remained the favoured option.

- 3.12. On the matter of Green Belt release, it was considered highly likely that some degree of Green Belt release within the district would be required, with Option A failing to deliver sufficient dwellings to meet the Council's own needs and to contribute up to 4,000 dwellings towards the GBBCHMA's unmet needs, and involving some development in relatively less sustainable locations. All other options assessed in the SHSID (Option B-G) involved some Green Belt release. The Council has also ensured that all growth options assume that safeguarded land is released at an average density of 35 dwellings per hectare¹⁰, thereby ensuring the need for further Green Belt release is kept to a minimum.
- 3.13. The Council has therefore concluded that further Green Belt release will likely be required in the district in order to ensure the District provides enough homes for both its own needs and a proportionate contribution to the unmet needs of the GBBCHMA. This still remains the case.
- 3.14. Despite this, the Council has sort to maximise suitable and sustainable non-Green Belt options. Green Belt sites were only allocated after these options were exhausted, including land within village boundaries, previously developed land and suitable sites within the Open Countryside (while still conforming to the spatial strategy). Previously developed land within the Green Belt was also prioritised over greenfield options in the site selection process¹¹.
- 3.15. With only 20% of the district's countryside not designated as Green Belt and concentrated in the north of the District, the District is at risk from development 'leapfrogging' to sites immediately beyond the Green Belt boundary. This can result in unsustainable patterns of housing, public services or employment land. As stated in section 2 of this Topic Paper, NPPF paragraph 142 recognises this challenge. Parts of the settlements of Penkridge and Wheaton Aston lie just outside the northern boundary of the Green Belt, which makes them vulnerable to development pressures. A strategic site is planned to the north of Penkridge outside of the Green Belt, with Penkridge currently planned to take the highest proportion of growth of any village (17.8%). Amongst other factors this recognises the district's role as a Tier 1 settlement, recognising it has some of the best services and public transport provision available to the District's rural settlements, and the recommendation for strategic growth in this location in the GBBCHMA Strategic Growth Study 2018. Wheaton Aston is identified as third tier village in the spatial strategy and therefore suitable for limited growth. Other settlements outside of the Green Belt are identified as Tier 4 or 5 and therefore only suitable for limited windfall housing growth in line with the spatial strategy. Development locations outside of the Green Belt have therefore been maximised in a manner consistent with the spatial strategy and sustainable patterns of development.

¹⁰ The density recommended in the GBBCHMA Strategic Growth Study 2018 to make efficient use of land prior to Green Belt release. For further information on the district's emerging density policy approach see the Housing Density Topic Paper 2022

¹¹ For further information see the Housing Site Selection Topic Paper 2022

3.16. The Council also consider that it has followed the process set out in paragraph 141 of the NPPF before concluding that exceptional circumstances exist. It has done this through prioritising suitable brownfield sites and underutilised land where possible, optimising the density of development and undertaking discussions with partner authorities through the Duty to Cooperate. This included writing to HMA and neighbouring authorities to understand if supply on non-Green Belt land would allow the District to reduce its housing target to avoid Green Belt release. The letter sent to other local authorities is set out in Appendix 1, but this did not elicit any responses which suggested the District would be able to reduce its housing target. Therefore, it was still clear that the Council was required to assess Green Belt site options in the 2021 Preferred Options and 2022 Publication Plan consultations in order to address a housing target which both met its own needs and delivered a proportionate contribution to the unmet needs of the GBBCHMA.

4. Exceptional Circumstances – Site Specific Considerations

- 4.1. Having concluded that exceptional circumstances exist to justify consideration of the realisation of Green Belt land to meet housing need at a strategic level, each site allocated within the Plan which is proposed to be removed from the Green Belt must be considered in turn.
- 4.2. A Green Belt Review dated 2019 was carried out to assess the sensitivities of Green Belt parcels within the district and the contribution they make towards the key aims of the Green Belt. This Study has been used as part of the site assessment work when selecting sites for development. This site should also be read alongside the site assessment topic paper¹² which considers issues other than Green Belt in more detail.
- 4.3. Whilst the contribution and harm rating of land within the Green Belt is an important factor when considering allocation, it is one of several factors which must be taken into account. It is also important to note that as shown in table 7.4 (provided below) of the 2019 Green Belt Study, the vast majority of land promoted had a harm rating of 'moderate – high' or above. Only 7.8% of land put forward had a harm rating of 'moderate' or below. This resulted in some settlements having very few Green Belt release options which had low harm ratings.

Table 7.4: Total area of land within promoted sites assessed at each harm rating (excluding absolute constraints)

Harm Rating	Total Area of Land within Promoted Sites (ha) ⁵²	Percentage of land ⁵²
Very High	985.30	27.2
High	1,571.40	43.4
Moderate - High	779.00	21.5
Moderate	197.10	5.4
Low - Moderate	81.00	2.2
Low	7.00	0.2
Very Low	0.60	0.0

¹² Housing Site Selection Topic Paper 2022

Source: South Staffordshire Green Belt Study 2019

Sites being removed from the Green Belt

- 4.4. Set out below are the sites proposed for removal from the Green Belt, alongside a summary of their site-specific exceptional circumstances. Factors behind choosing each site are only summarised in brief, for further details on the justification for the selection of each site please see the Housing Site Selection Topic Paper 2022 and its appendices.

Strategic Site: Land North of Linthouse Lane (Policy SA3)

- 4.5. In line with the spatial strategy, this proposed strategic allocation has been identified adjacent to the Black Country's urban area north of Linthouse Lane. The site benefits from the area's proximity to public transport links towards employment opportunities and the Black Country urban area and the potential for land parcels to accommodate a large mixed-use development in this location.
- 4.6. The site has the potential to deliver a minimum of 1200 homes by the end of the plan period with an estimated total capacity of 1,976 homes running beyond the plan period.
- 4.7. The site is within parcel 'S20Fs1' within the 2019 Green Belt Study. This parcel is classed as having a high level of sensitivity.
- 4.8. There are insufficient non green belt sites within close proximity to the Black Country combination to meet the spatial strategy requirements, especially taking into account the contribution of 4000 homes the plan is seeking to make towards the unmet housing needs of the GBBCHMA. There are no non-Green Belt land options in this broad location that could accommodate a similar level of development and the site is in an area of lesser Green Belt harm and landscape sensitivity than other large site options in this broad location, whilst many other smaller site options are affected by significant constraints. Therefore, the release of Green Belt land on the northern edge of the Black Country is required. Land North of Linthouse Lane has been demonstrated to be the most appropriate site option through the site assessment process.

Strategic Site: Land at Cross Green (Policy SA2)

- 4.9. In line with the spatial strategy Land at Cross Green has been identified as an employment-led growth opportunity and strategic housing site to deliver a minimum of 1,200 homes. The site benefits from the area's proximity to strategic employment sites (ROF Featherstone and i54) and the potential for land parcels to accommodate a large mixed-use development in this location.
- 4.10. The site is within parcels 'S44As1' and 'S20Ds1' within the 2019 Green Belt Study. These parcels have high and very high harm ratings.
- 4.11. There are insufficient non green belt site within close proximity to the Black Country combination to meet the spatial strategy requirements, especially taking into account the contribution of 4000 homes the plan is seeking to make towards the unmet housing needs of the GBBCHMA. Whilst the site has some areas of higher Green Belt harm and landscape sensitivity than other land on the northern edge of the Black Country, it offers a unique

opportunity to align housing growth with the strategic employment sites at i54 and ROF Featherstone and can accommodate safeguarded land for a potential rail-based park and ride site. Therefore, the release of Green Belt land on the northern edge of the Black Country is required. Land at Cross Green has been demonstrated to be the most appropriate site option through the site assessment process.

Strategic Site: Land East of Bilbrook (Policy SA1)

- 4.12. Land East of Bilbrook has been identified as a strategic housing site and is proposed for allocation to deliver a minimum of 848 new homes. Bilbrook / Codsall is identified as a Tier 1 village and therefore one of the most sustainable locations for development within the district. It is also one of the strategic areas recommended for growth in the GBBCHMA Strategic Growth Study and requires new development to deliver a new first school and station car parking identified in the IDP. Because of these factors, Bilbrook / Codsall was identified for a significant proportion of the district's housing growth.
- 4.13. The majority of the site is within parcel 'S46Cs2' within the 2019 Green Belt Study. This parcel is identified as having a high level of harm rating. A small proportion is within 'S46Cs1' which has a very high harm rating, but is not proposed for a housing allocation.
- 4.14. There are insufficient non green belt sites within close proximity Bilbrook to meet the spatial strategy requirements. The site is in an area of high Green Belt harm, similar to the majority of land around Codsall/Bilbrook, and is in an area of lesser landscape sensitivity. The site is able to accommodate the required first school for the villages and also has better active travel links to a nearby strategic employment site (i54). Therefore, the release of Green Belt land on the edge Bilbrook required. Land East of Bilbrook has been demonstrated to be the most appropriate site option through the site assessment process.

Site 582: Land north of Langley Road

- 4.15. Land north of Langley Road is a proposed housing allocation to deliver a minimum of 390 new homes. Being located on the western edge of the Black Country the site benefits from the area's proximity to services and facilities in the adjacent Black Country urban area
- 4.16. The site is within parcels 'S59Bs1' and 'S59Bs2' within the 2019 Green Belt Study. These parcels are identified as 'high' and 'medium – high' harm respectively, with the site being primarily contained to the 'medium-high' part of the parcel.
- 4.17. There are insufficient non green belt sites within close proximity to the Black Country combination to meet the spatial strategy requirements, especially taking into account the contribution of 4000 homes the plan is seeking to make towards the unmet housing needs of the GBBCHMA. The site is in an area of lower Green Belt harm than the majority of other site options on the western edge of the Black Country. It also scores well in the Sustainability Appraisal due to its proximity to local education facilities. Therefore, the release of Green Belt land on the western edge of the Black Country is required. Land north of Langley Road has been demonstrated to be the most appropriate site option through the site assessment process.

Site 079: Land south of Kiddemore Green Road, Brewood

- 4.18. Land south of Kiddemore Green Road is a proposed housing allocation to deliver a minimum of 43 new homes. Brewood is identified as a Tier 2 village and is therefore a sustainable location to accommodate a proportionate scale of housing growth.
- 4.19. The vast majority of the site is within parcel 'S36As1' within the 2019 Green Belt Study. The parcel has a moderate harm rating.
- 4.20. There are insufficient non green belt sites within close proximity to Brewood to meet the spatial strategy requirements. The site is of similar landscape sensitivity to other land around Brewood but is of lesser Green Belt harm and also lies closer to the village's centre than most other options. It also offers an opportunity to deliver specialist elderly retirement living in a location close to village centre and local health facilities. Therefore, the release of Green Belt land on the edge Brewood required. Land south of Kiddemore Green Road has been demonstrated to be the most appropriate site option through the site assessment process.

Site 704: Land off Norton Lane, Great Wyrley

- 4.21. Land off Norton Lane, Great Wyrley is a proposed housing allocation to deliver a minimum of 31 new homes. Whilst the settlements are not identified as recommended strategic locations for growth in the GBBCHMA Strategic Growth Study 2018, Cheslyn Hay/Great Wyrley are still identified as Tier 1 settlements and therefore` some of the more sustainable locations for development within the district. In line with this classification, Tier 1 villages including Cheslyn Hay/Great Wyrley were identified for a significant proportion of the district's housing growth.
- 4.22. The site is within parcels 'S11A' and 'S12A' within the 2019 Green Belt Study. Both parcels have a moderate harm rating.
- 4.23. There are insufficient non green belt sites within close proximity to Great Wyrley to meet the spatial strategy requirements. The site is in an area of low Green Belt harm, scores well in terms of its proximity to education and is on previously developed land within the Green Belt. Therefore, the release of Green Belt land on the edge Great Wyrley is required. Land off Norton Lane has been demonstrated to be one of the most appropriate site options through the site assessment process.

Site 730: Fishers Farm, Great Wyrley

- 4.24. Fishers Farm, Great Wyrley is a proposed housing allocation to deliver a minimum of 10 new homes. Whilst the settlements are not identified as recommended strategic locations for growth in the GBBCHMA Strategic Growth Study 2018, Cheslyn Hay/Great Wyrley are still identified as Tier 1 settlements and therefore` some of the more sustainable locations for development within the district. In line with this classification, Tier 1 villages including Cheslyn Hay/Great Wyrley were identified for a significant proportion of the district's housing growth.
- 4.25. The site is within parcel 'S21A' within the 2019 Green Belt Study. The parcel identified the site as having a moderate harm rating.
- 4.26. There are insufficient non green belt sites within close proximity to Great Wyrley to meet the spatial strategy requirements. It is in an area of lesser Green Belt harm than most land in the area and scores well in terms of its proximity to schools in the Sustainability Appraisal. It is also on previously developed land in the Green Belt. Therefore, the release of Green Belt land

on the edge Great Wyrley is required. Fishers Farm has been demonstrated to be the most appropriate site option through the site assessment process.

Site 536a: Land off Holly Lane, Cheslyn Hay

- 4.27. Land off Holly Lane, Cheslyn Hay is a proposed housing allocation to deliver a minimum of 84 new homes. Whilst the settlements are not identified as recommended strategic locations for growth in the GBBCHMA Strategic Growth Study 2018, Cheslyn Hay/Great Wyrley are still identified as Tier 1 settlements and therefore some of the more sustainable locations for development within the district. In line with this classification, Tier 1 villages including Cheslyn Hay/Great Wyrley were identified for a significant proportion of the district's housing growth.
- 4.28. The site is within parcel 'S16D' within the 2019 Green Belt Study. The parcel identified the site as having a high harm rating.
- 4.29. There are insufficient non green belt sites within close proximity to Cheslyn Hay to meet the spatial strategy requirements. The site is on land which is of similar Green Belt harm to the majority of other Green Belt land around the village and offers an opportunity to provide drop off parking for the adjacent school. Its size and proximity to local shops and public transport means it may also be a suitable opportunity to address the acute need for specialist elderly housing in Cheslyn Hay/Great Wyrley. Therefore, the release of Green Belt land on the edge Cheslyn Hay is required. Land off Holly Lane has been demonstrated to be the most appropriate site option through the site assessment process.

Site 224: Land adjacent to 44 Station Road, Codsall

- 4.30. Land adjacent to 44 Station Road, Codsall is a proposed housing allocation to deliver a minimum of 85 new homes. Bilbrook / Codsall is identified as a Tier 1 village and therefore one of the most sustainable locations for development within the district. Codsall also requires new development to deliver station car parking identified in the IDP. Bilbrook / Codsall was identified for a significant proportion of the district's housing growth along with the other two Tier 1 villages.
- 4.31. The site is within parcel 'S53Hs2' within the 2019 Green Belt Study. The parcel identified the site as having a moderate - high harm rating.
- 4.32. There are insufficient non green belt sites within close proximity to Codsall to meet the spatial strategy requirements. Whilst the site is in an area of higher landscape sensitivity than some other sites around the settlement, it is in an area of lower Green Belt harm than other site options. It is also in very close proximity to Codsall rail station and is a very short distance from a Large Village Centre, whilst also offering a unique opportunity to deliver additional car parking for users of Codsall station. Therefore, the release of Green Belt land on the edge Codsall is required. Land adjacent to 44 Station Road has been demonstrated to be the most appropriate site option through the site assessment process.

Site 463 & 284: Land off Billy Buns Lane & Gilbert Lane, Wombourne

- 4.33. Land off Billy Buns Lane & Gilbert Lane, Wombourne is a proposed housing allocation to deliver a minimum of 223 new homes. Wombourne is identified as a Tier 2 village although it

is the largest of the five Tier 2 villages, containing the only Large Village Centre in this tier of the settlement hierarchy, as well as the largest settlement in the south of the district. Wombourne is therefore a sustainable location to accommodate a proportionate scale of housing growth.

- 4.34. The majority of the site is within parcels 'S72Bs3' within the 2019 Green Belt Study. The parcel identified the site as having a low - moderate harm rating.
- 4.35. There are insufficient non green belt sites within close proximity to Wombourne to meet the spatial strategy requirements and the large area of previously developed land to the south-west of the village (Sites 310a & 310b) is in active employment use and currently unavailable. Land off Billy Buns Lane & Gilbert Lane has a far lower harm rating than most land around both Wombourne and most other villages in South Staffordshire. It also scores well in the Sustainability Appraisal due to its access to education, is close to a regular bus route into the Black Country and sits within a short walk of one of the district's three Large Village Centres. Therefore, the release of Green Belt land on the edge Wombourne is required. Land off Billy Buns Lane (463) & Gilbert Lane (284), Wombourne has been demonstrated to be the most appropriate site option through the site assessment process.

Site 416a: Land off Orton Lane, Wombourne

- 4.36. Land off Orton Lane, Wombourne is a proposed housing allocation to deliver a minimum of 79 new homes. However, a large proportion of the site has already been removed from the Green Belt through the 2012 Core Strategy and 2018 Site Allocations Document. Only the northeast section of the site is currently within the Green Belt and is being proposed for release. Wombourne is identified as a Tier 2 village although it is the largest of the five Tier 2 villages, containing the only Large Village Centre in this tier of the settlement hierarchy, as well as the largest settlement in the south of the district. Wombourne is therefore a sustainable location to accommodate a proportionate scale of housing growth.
- 4.37. The site falls within parcel 'S53Cs1' within the 2019 Green Belt Study. The parcel identified the site as having a moderate – high harm rating.
- 4.38. There are insufficient non green belt sites within close proximity to Wombourne to meet the spatial strategy requirements and the large area of previously developed land to the south-west of the village (Sites 310a & 310b) is in active employment use and currently unavailable. The removal of the northeast section of the site from the Greenbelt and allocation for housing represents a logical extension to the existing allocation / Safeguarded Land and will ensure that the land is delivered comprehensively as a single site.

Site 576: Land off Hyde Lane, Kinver

- 4.39. Land off Hyde Lane, Kinver is a proposed housing allocation to deliver a minimum of 44 new homes. Kinver is identified as a Tier 2 village in the spatial strategy and is therefore a sustainable location to accommodate a proportionate scale of housing growth.
- 4.40. The site is within parcel 'S64Gs2' within the 2019 Green Belt Study. The parcel identified the site as having a moderate harm rating.

- 4.41. There are insufficient non green belt sites within close proximity to Kinver to meet the spatial strategy requirements and Land off Hyde Lane has a lesser Green Belt harm rating than other alternative sites in this area. Therefore, the release of Green Belt land on the edge Kinver is required. Land off Hyde Lane, Kinver has been demonstrated to be the most appropriate site option through the site assessment process.

Site 006: Land at Boscomoor Lane, Penkridge

- 4.42. Land at Boscomoor Lane, Penkridge is a proposed housing allocation to deliver a minimum of 80 new homes. Penkridge is identified as a Tier 1 village and therefore one of the most sustainable locations for development within the District. In line with this classification, Tier 1 villages including Penkridge were identified for a significant proportion of the district's housing growth.
- 4.43. The site is within parcel 'S32Fs3' within the 2019 Green Belt Study. The parcel identified the site as having a low-moderate harm rating.
- 4.44. Although land is being allocated to the north of Penkridge outside of the Green Belt, this site has also been selected for allocation reflecting its lower Green Belt harm and sustainable location. The site is within walking distance of a rail station and has good access to a nearby local centre, whilst also being on land of significantly less Green Belt harm than most other sites in both Penkridge and other Tier 1 and 2 villages. Therefore, given the need to release Green Belt at a strategic level and the merits of the site in relation to other Green Belt options in the district, the release of this Green Belt site is required to meet the housing target.

Site 313: Land off Himley Lane, Swindon

- 4.45. Land off Himley Lane, Swindon is a proposed housing allocation to deliver a minimum of 22 new homes. Swindon is identified as a Tier 3 village within the spatial strategy. The village is therefore suitable for limited planned growth due to its smaller range of services and facilities than Tier 1 and 2 settlements.
- 4.46. The site is within parcel 'S72As2' within the 2019 Green Belt Study. The parcel identified the site as having a moderate harm rating.
- 4.47. There are insufficient non green belt sites within close proximity to Swindon to meet the spatial strategy requirements. It is also unlikely that the adjacent safeguarded land and development boundary allocation can accommodate sufficient growth to deliver affordable housing (10+ dwellings) without additional land to create a regular site layout. Therefore, the release of Green Belt land on the edge Swindon is required. Land off Himley Lane has been demonstrated to be the most appropriate site option through the site assessment process.

5. West Midlands Interchange

- 5.1. The West Midlands Interchange (WMI) is a proposed Strategic Rail Freight Interchange (SRFI) on land west of Junction 12 of the M6, which was granted approval via the Development Consent Order (DCO) process on 4 May 2020. This consent provides for a significant amount of new B8 employment land to be provided within the district's Green Belt. The DCO allows for

an intermodal freight terminal, up to 743,200sqm of warehousing and ancillary buildings, new road infrastructure and landscaping into a large tract of land south of the A5 and east of the A449, essentially urbanising a large area of isolated Green Belt.

- 5.2. The DCO was granted by the Planning Inspectorate recognising the strategic benefits it would bring to an expanded network of SRFIs, facilitating the model shift of freight from road to rail. The examination also recognised¹³ that the emerging unmet employment land need from the Black Country formed part of the justification for permitting this scheme, based upon the findings of the Black Country EDNA at that time. Since the examination's conclusion, work undertaken by Stantec for the Black Country authorities¹⁴ has identified that 67ha of land from WMI is directly attributable to the Black Country authorities' employment land shortfalls, which stood at 210ha as of the 2021 Black Country Draft Plan (Reg 18) consultation. The latest available evidence therefore suggests there is still a substantial need for WMI to contribute towards the unmet needs of the Black Country authorities, which are a significant cross-boundary matter for the local plan to address.
- 5.3. The 2022 Employment Site Selection Topic Paper recommends the WMI site for allocation. This recognised the site scores significantly better than other sites in the EDNA2, that it could make a contribution to unmet needs within the FEMA in a more sustainable manner than other sites (due to the proposed rail link) and that the principle of B8 development on the site has already been established by the DCO. To provide assurance to Duty to Cooperate partners regarding the site's delivery and to reflect the largely urbanising effect of the DCO on the developable area of the site, it is proposed that the developable area of WMI (232.5ha) be removed from the Green Belt, with the areas identified for green infrastructure on the consented plans to be retained within the Green Belt.

¹³ Para 5.3.69. of the WEST MIDLANDS RAIL FREIGHT INTERCHANGE Examining Authority's Report of Findings and Conclusions and Recommendation to the Secretary of State for Transport

¹⁴ West Midlands Strategic Rail Freight Interchange Employment Issues Response Paper – Whose need will the SRFI serve? February 2021

Appendix 1: Duty to Cooperate exceptional circumstances letter



Please ask for: [REDACTED]

Direct Dial: [REDACTED]

Email: [REDACTED]

8th January 2021

Sent via email

Dear Sir/Madam,

South Staffordshire Council Local Plan Review – Review of Green Belt

As you will be aware South Staffordshire is currently undertaking a review of its Local Plan. One of the key reasons for this is an existing Local Plan Review policy (Policy SAD1) which was adopted by the Council in its Site Allocations Document 2018. This requires the District to review housing supply options to meet both the District's own housing needs and potentially unmet cross-boundary needs from the Greater Birmingham Housing Market Area (GBHMA), including from the Black Country.

As a result of these pressures, the District is currently considering meeting ambitious housing targets through its emerging Local Plan Review, proposing to accommodate approximately 8,845 dwellings in the 2018 to 2037 period as set out in the 2019 Spatial Housing Strategy and Infrastructure Delivery consultation. This level of growth includes what the District believes to be a proportionate contribution of 4,000 dwellings to the unmet needs of the GBHMA, based on the current evidence of unmet needs in the GBHMA up to 2038¹ and the GBHMA-wide evidence base provided by the GBHMA Strategic Growth Study 2018. However, even if South Staffordshire delivered all current housing allocations, permissions and safeguarded sites for housing land, the District's most recent consultation suggests that only around 3,800 dwellings would be delivered in the District between 2018 – 2037. This is evidently well short of the level of growth the District is seeking to achieve in the Local Plan Review.

¹ As set out in the 'Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Housing Need and Housing Land Supply Position Statement (July 2020)' and the 'Black Country Urban Capacity Review December 2019'





The Council will continue to review its housing land supply to inform its 2020 Preferred Options consultation. However, due to the District's rural nature and the lack of any towns or cities in South Staffordshire, it is unlikely that achievable density uplifts to existing suitable land supply will significantly alter the capacity on existing sites. Whilst there are some areas of land beyond the Green Belt in the District, the Council's 2019 Spatial Housing Strategy and Infrastructure Delivery consultation and the GBHMA Strategic Growth Study both suggest that it is unlikely to be sustainable or deliverable to focus all new housing allocations in the District on the limited area of Open Countryside in South Staffordshire. The District therefore considers that evidence to date suggests it is highly likely that South Staffordshire will need to release further Green Belt land through the Local Plan Review in order to meet its own needs and to make a proportionate contribution to the GBHMA's unmet housing needs.

Given the above, and in order to ensure the District meets its duties under paragraph 137 of the NPPF, would welcome your Council's latest position on the following matters, acknowledging that this may be subject to change through emerging national changes to strategic housing matters (the Planning for the Future White Paper);

- Whether or not your authority is able to assist with the unmet housing needs of the GBHMA, in particular those arising from the Black Country
- Whether or not your authority is able to provide sufficient additional housing supply to enable South Staffordshire District Council to reduce its proposed Local Plan Review housing target
- What your authority would be prepared to agree with South Staffordshire District Council in a statement of common ground covering strategic housing needs in the District and GBHMA

To ensure we can progress these discussions in a timely manner, we would welcome a response from yourselves on the above by no later than 26th February 2021. If you would like to meet the Council's officers to discuss this further before this date, then please get in touch.

We look forward to hearing from you on this matter.

Yours faithfully,



[Redacted Name]

Lead Planning Manager



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