

**Matter 2 – Action 2.2 List of Appendices**

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**Appendix A1 – Black Country and West Birmingham CCG Preferred Options Regulation 18 Rep.**

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**Document Element:** Question 1

**Respondent:** NHS

**Date received:** 10/12/2021 via Web

**Full text:**

I agree that the evidence base set out in Appendix A is appropriate to inform the new local plan, as the development close to the neighbouring Black Country considers the impact of development on the Health Care Infrastructure and health and wellbeing of local residents.

**Attachments:** None

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**Document Element:** Question 2

**Respondent:** NHS

**Date received:** 10/12/2021 via Web

**Full text:**

The Black Country & West Birmingham CCG have submitted separately a closed assessment of new housing development close the boundary of the Black Country and the affect that impact has on the Health Care Infrastructure of the Black Country and West Birmingham CCG.

**Attachments:** None

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**Document Element:** Question 3

**Respondent:** NHS

**Date received:** 10/12/2021 via Web

**Full text:**

The Black Country and West Birmingham CCG have been involved in providing information to inform the visions and strategic objectives of the Local plan.

**Attachments:** None

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**Document Element:** Question 5

**Respondent:** NHS

**Date received:** 10/12/2021 via Web

**Full text:**

We support the policy approach in Policy DS3, as the development close to the neighbouring Black Country considers the impact of development on the Health Care Infrastructure and health and wellbeing of local residents. The Black Country & West Birmingham CCG have submitted separately a closed assessment of new housing development close the boundary of the Black Country and the affect that impact has on the Health Care Infrastructure of the Black Country and West Birmingham CCG.

**Attachments:** None

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**Document Element:** Question 6

**Respondent:** NHS

**Date received:** 10/12/2021 via Web

**Full text:**

We support the policy approach in and Policy DS4 –Longer Term Growth Aspirations for a New Settlement. The Black Country and West Birmingham CCG have been involved in providing information to inform the visions and strategic objectives of the Local plan. The Black Country & West Birmingham CCG have submitted separately a closed assessment of new housing development close the boundary of the Black Country and the affect that impact has on the Health Care Infrastructure of the Black Country and West Birmingham CCG.

**Attachments:** None

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**Document Element:** Question 7

**Respondent:** NHS

**Date received:** 10/12/2021 via Web

**Full text:**

The Black Country & West Birmingham CCG have submitted information and assessment of new housing development close the boundary of the Black Country and the affect that impact has on the Health Care Infrastructure of the Black Country and West Birmingham CCG, relating to Policy SA1 – Strategic development location: Land East of Bilbrook, Policy SA2 – Strategic development location: Land at Cross Green, Policy SA3 – Strategic development location: Land North of Linthouse Lane.

**Attachments:** None



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**Document Element:** Question 8

**Respondent:** NHS

**Date received:** 10/12/2021 via Web

**Full text:**

The Black Country & West Birmingham CCG have considered where relevant those respective site allocations close to the BCWB CCG boundary and responded with the mitigation measures required to ensure a robust Health Care Infrastructure is in place through developer contribution and planning obligations where affected by cross border implication.

**Attachments:** None

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**Document Element:** Question 11

**Respondent:** NHS

**Date received:** 10/12/2021 via Web

**Full text:**

The Black Country & West Birmingham CCG agrees with the policy NB5 - Renewable and low carbon energy generation targets to improve the Health & Wellbeing of all citizens at a local and national level.

**Attachments:** None



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**Document Element:** Policy HC14: Health Infrastructure

**Respondent:** Black Country NHS Integrated Care Board

**Date received:** 29/05/2024 via Web

**Full text:**

In summarising the key health impacts identified through the Policy drafting process, the ICB is of the opinion that the Draft South Staffs Local Plan makes a positive contribution to addressing the identified health issues. Policy HC14 Healthcare Infrastructure in particular is supported for recognising the connection between housing development, local population change and their potential impact on the Primary and Secondary Healthcare Network.

**Change suggested by respondent:**


-


**Legally compliant:** Not specified


**Sound:** Not specified

**Comply with duty:** Not specified

**Attachments:**

 South Staffs Local Plan consultation Policy DLP Health Infrastructure.pdf - <https://sstaffs.oc2.uk/a/3sj>

 Draft Healthcare SPD Oct 23 v2.2.pdf - <https://sstaffs.oc2.uk/a/3sk>

*Please note:  files require a system login to access them.*



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## Representation on Draft South Staffs Local Plan consultation

### Policy HC14: Health Infrastructure

The ICB supports the Health Infrastructure section of the Local Plan in its expression of stakeholders committing to change at a whole systems level and to working together to achieve a sustainable and resilient South Staffs, with citizens involved at every level of governance for health and wellbeing. This can be achieved by determining the right proportion of resource that is committed to delivering prevention, treatment and care for health and wellbeing through the following:

- The first priority should be to addressing the integration of health and care systems. It includes harnessing the available information and intelligence into a more complete picture. This will strengthen the relationships between the organisations involved, to develop more seamless and co-ordinated responses to health and wellbeing needs. It will also ensure that the community gets the best value and outcomes possible from the local health care economy and infrastructure.
- A commitment to addressing improvements to the determinants of health within South Staffs such as housing, education, employment, active lifestyles and transport.
- Evolving a population that is equipped with the right skills to be informed about health, care and wellbeing and also be able to access and navigate systems to appropriate self-care or services for themselves and others.

In summarising the key health impacts identified through the Policy drafting process, the ICB is of the opinion that the Draft South Staffs Local Plan makes a positive contribution to addressing the identified health issues. Policy HC14 *Healthcare Infrastructure* in particular is supported for recognising the connection between housing development, local population change and their potential impact on the Primary and Secondary Healthcare Network.

It is acknowledged that developer contributions can affect the financial viability of certain developments and will therefore not always be appropriate or reasonable to apply. The ICB would not wish to support the imposition of a regime that would see the viability of development compromised by such contributions.

However, based on an independent viability assessment, the ICB suggests that developer contributions for Healthcare infrastructure could be deferred or discounted where this would not make the development unacceptable in planning terms. This would retain a degree of flexibility in applying the standard contributions/charges where affordability based on development viability is clearly demonstrated, without compromising the planning necessity for identified infrastructure and facilities.

Where developer contributions are deferred the ICB would support South Staffs Council potentially applying clauses in Planning Obligations relating to deferred contributions, which will seek to recover all or part of the discount in circumstances where the financial climate and economic viability of the development improves. Here, any recaptured discount will be limited to the full standard developer contributions for the Healthcare infrastructure applicable at the time the planning obligation for a development was signed.

The ICB also would support the emphasis in the first paragraph of Policy HC14 and its requirement for Applicants to consult the ICB in advance of the submission of a planning application where a significant amount of housing is to be provided.

The ICB also supports the intention to produce separate guidance as part of an SPD, on the methodology used for calculating the appropriate level of developer contributions. To this end, a draft SPD is attached for the Council's consideration.

# **Supplementary Planning Document**

# **Development and Healthcare Infrastructure in the Black Country**

*Much of what affects the population's health lies outside the domain of the health sector. Whether people are healthy or not is determined by a complex interaction of personal circumstances, lifestyle factors and the local environment.*

*The demands on health and care resources are rising year on year. People are living longer with ever more complex conditions. Continuing progress in treatments and medical techniques comes with additional costs and expectations, with modern lifestyle issues such as obesity causing increases in long-term health conditions.*

*The social role in achieving sustainable development is to support strong, vibrant and healthy communities, by providing the required supply of housing and, the creation of a high-quality built environment, with accessible local services enhancing, among other outcomes, optimal public health and social wellbeing.*

*Good planning can play a crucial role in developing healthier communities and improving lifestyle choices. By considering these factors and their distribution, planning policies and decisions can enhance the potential to influence health and wellbeing, and therefore reduce health inequalities.*

*A fundamental aspect of this approach is the provision an adequate healthcare infrastructure with the capacity to provide positive outcomes reflecting the changing dynamics of the local population.*

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## INTRODUCTION

This Supplementary Planning Document (SPD) was approved by X Council's Cabinet on X.

It was produced in collaboration by the Local Planning Authority (LPA) and Integrated Care Board (ICB). It incorporates changes made to the SPD in response to comments received during a public consultation from X to Y.

SPDs were introduced by the Planning and Compulsory Purchase Act 2004 (as amended under the Localism Act 2011) as part of the reforms to the planning system. Although not forming part of the statutory Development Plan, one of the functions of an SPD is to provide further detail on policies and proposals within the development plan. SPDs must be consistent with national and regional planning policies as well as the policies set out in the development plan.

This SPD was prepared in line with the statutory framework for planning obligations set out in:

- Section 106 of the Town and Country Planning Act 1995 and Regulations 122 and 123 of the Community Infrastructure Levy Regulations 2010 (as amended);
- Government policy on planning obligations and conditions as set out in the National Planning Policy Framework; and
- National Planning Practice Guidance.

The purpose of this SPD is to assist in interpreting the policy requirements of the Development Plan, providing supporting information and guidance for organisations and individuals involved in submitting a planning application, as well as those tasked with the determination and enforcement of planning applications for all proposed developments impacting upon the health of the population of the [relevant Council]. The SPD provides additional guidance on the delivery of the higher level Development Plan policies, and through following the key considerations in the SPD, planning will contribute positively towards improving health and support sustainable development.

This SPD is therefore a material consideration in the determination of planning applications. It should be read in conjunction with policy/ies of the insert relevant) Local Plan title. It is intended to expand on existing policies rather than duplicate other planning documents. The SPD does not (and cannot) create new policy in its own right.

Applicants are therefore strongly advised to have regard to this SPD when preparing planning applications and are also encouraged to seek pre-application advice before making a planning application. This provides an opportunity to enter into discussions with planning officers and relevant colleagues about the proposal. It also means that developer contributions that are likely to be required are made known to the developer as early as possible in the decision-making process. Please note that the provision of pre-application advice will involve a charge. Further information can be found on the Council's website at insert contact details).

It is recognised that the developer contributions towards primary healthcare facilities should not undermine the deliverability of the development. However, in line with paragraph 58 of the NPPF, where planning applications have complied with the policies in the Development Plan, they will be assumed to be viable as demonstrated through the Local Planning

Authority's viability assessment of the Local Plan. It is up to the applicant to demonstrate whether particular circumstances justify the reason for the non-compliance. In these instances, developers will be expected to provide a viability assessment at their own cost.

### **Scope and Status of the SPD**

This SPD is intended to:

- be taken into account during the preparation of proposals for residential development;
- promote healthy developments and be an important material consideration in the determination of planning applications, by providing key criteria against which to assess development proposals in support of X Local Plan Policies X & Y;
- briefly explain the funding mechanisms for providing or enhancing existing healthcare facilities;
- provide guidance about how the Council will secure healthcare infrastructure provision (including financial and 'Payment in Kind' contributions) to support proposed development and help deliver sustainable communities;

### **What is a Healthcare Facility?**

For the purposes of this SPD, a **healthcare facility** is a place from which NHS-commissioned healthcare services are delivered. Such services can include (but are not limited to):

- **Primary Care:** such as GP or nurse-led services.
- **Intermediate Care:** including day places and overnight accommodation.
- **Acute:** elective, non-elective (including emergency) care and day care beds; and
- **Mental Health:** inpatient and outpatient.

A healthcare facility may be owned by an NHS organisation, or owned by a third party but operated by an organisation delivering NHS services.

As technology, ways of working and people's needs continue to evolve, so too will healthcare facilities. In future, care and advice may be delivered from a wide range of locations and by a variety of means, such as by video. Innovations may require new types of facilities, for example community-based remote consultation suites for those who do not have access to the necessary technology at home, or in locations where a 'critical mass' of potential service users may justify such provision.

## **CONTEXT**

### ***Why Local Planning Authorities Engage in Health & Wellbeing***

Traditionally the impact of developments on health and wellbeing has not been an explicit consideration within the planning system. However, this is changing. There is increasing recognition that the environment is a major determinant of our health and wellbeing; and that the planning system has a major influence on the environment. LPAs will enlist the help of [the NHS Black Country Integrated Care Board \(ICB\)](#), [NHS England \(NHSE\)](#) -and [Directors of Public Health \(DPH\)](#) to enable the key planning principles in the NPPF in relation to health and wellbeing to be met. This will be beneficial in relation to the preparation or review of Local Plans as well as in reaching decisions on proposals where they affect public health and healthcare services.

Policies and proposals to deliver better housing, good design of the built environment, access to recreational and open space and the encouragement of physical activity can help bring about significant public health benefits.

Both the public health and planning sectors aim to create healthy sustainable communities; however, each sector employs different approaches and methods to achieve this aim. A process of knowledge exchange and cross-sector working needs to evolve to support the integration of health consideration with development management. This approach will provide for the creation of environments supporting and encouraging healthy lifestyles, and, taking into account the changing needs of the local population, identifying and securing the facilities needed for primary, secondary, and tertiary care.

Development plays a key role in this process of shaping environments through good design, with the aim of the Local Development Plan being to direct growth to the most sustainable locations, ensuring the most appropriate housing is provided in the right places for supporting wider health and wellbeing objectives. As part of this it is important that new development does not increase pressure on the healthcare system.

### ***Linking the Built Environment and Health***

Key Factors:

- A critical issue for Local Plans that impacts on the NHS is the scale and location of new developments, particularly residential development. This can impact directly on the level of healthcare services required and may overburden existing facilities if provision is not made to meet the increased demands from new residents.
- New planned housing should therefore be aligned with health infrastructure planning, and information should be exchanged on the scale of development and timeframe for delivery.
- Evaluating the ratio of new developments to healthcare services – and the additional requirements placed on the local authority to serve new and projected residents – shaped the planning obligations policy (insert Policy HWx) within the (name) Local Plan. This is augmented by this SPD, which provides guidelines on contributions required to provide for health and social care. This may embrace both CIL and S106 Agreements as potential delivery vehicles, depending on the circumstances within each local authority area.

### ***Policy Justification***

At the national level, the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) have brought about a greater integration of health and wellbeing in Plan making and decision taking. Under this framework, the Planning system can play an important role in facilitating social interaction and creating healthy inclusive communities. The NPPF provides Planners and NHS organisations with significant opportunities to engage with and promote this agenda. (See Appendix I).

Under relevant Local Plan Policy (insert), the Council requires applicants to mitigate against potentially significant negative health impacts. A core planning principle is to take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.

***Council-Specific Policies inserted here for reference***

### ***Planning Application Requirements***

The intention to consider development's impact on healthcare infrastructure should be raised early in the planning process. Consequently, as well as developments enabling new or enhanced healthcare facilities, early engagement by developers with the Local Planning Authority (LPA) is essential so that the local **Integrated Care Board (ICB)** can respond to the impact of development by preparing for that growth occurring.

ICBs can be effective consultees for development projects and can help identify potential health impacts and mitigating actions in relation to the demands on local health infrastructure and services.

Depending on the scale of the development project, it may be appropriate to consider healthcare infrastructure along with other assessments required as part of local information requirements for planning applications. The consideration of healthcare infrastructure issues is most effective when it is undertaken at the earliest stage to inform and shape a development project during the options appraisal and design stage (that is, before decisions are made and submitted as part of a planning application). It is essential that all infrastructure requirements are factored into the cost of a potential development when negotiating to buy or take an option on a site.

As infrastructure provision must be considered an integral part of any development proposal and planning application submission, developers should read the Council's most recent Infrastructure Delivery Plans for help in identifying the likely infrastructure requirements.

### ***HOW IS NEED IDENTIFIED BY THE NHS?***

Integrated Care Systems are a way for NHS organisations and local representatives to develop their own, locally appropriate proposals to improve health and care for residents. They work in partnership with local councils, drawing on the expertise of frontline staff and on conversations about priorities within the communities they serve.

One role of an ICB is to coordinate capital and revenue expenditure to ensure that capital investment is:

- coordinated between different NHS providers.
- reflective of local judgments about the balance between competing priorities for capital expenditure.
- prioritised to those investments which support the future sustainability of local services for future generations.

In this context, the ICB works with its partner local authorities to understand where growth is likely to occur and how best to serve needs arising from that growth.

Taking account of the Council's five-year housing land supply and longer-term Local Plan aspirations, the ICB produces and maintains a **Strategic Plan**. The evidence in the Strategic Plan which anticipates the impact of growth on healthcare services and the mechanisms for delivery (given that developer contributions alone are unlikely to be sufficient or proportionate) is a key tool in demonstrating the deliverability of sites and providing

assurances to local communities that healthcare needs will be met following the development.

### ***National Evidence - SHAPE Atlas***

The NHS assessment of need and trends in healthcare demand at the local level are underpinned by a real-time evidence system. Strategic Health Asset Planning and Evaluation (SHAPE) is available to NHS and Local Authority professionals with a role in Public Health or Social Care. It is an NHS dedicated, web enabled, evidence-based application that informs and supports the strategic planning of services and assets across a whole health economy. The application enables healthcare professional to review data at a national and local level, with main complex layers of evidence gathered data in real time. Its analytical and presentation features help service commissioners to evaluate the impact of service configuration on populations and assess the optimum location of services to provide the best affordable access to care.

SHAPE links national data sets, clinical analysis, public health, primary care, and demographic data with information on healthcare estates performance and facilities location. The application also includes a fully integrated Geographical Information System mapping tool which provides flexible geographies including ICS, ICB, LA, ward and Lower Layer Super Output Area (LSOA).

The ICB are able to use SHAPE to evaluate the impact from a potential new development by locating the closest GP practices and assessing each practice's clinical data, which includes number of registered patients and their age profile, practice workforce, catchment areas, Care Quality Commission (CQC) assessments and Primary Care Network (PCN) information. Travel time analysis for single or multiple sites and detailed demographic data are also assessed to support the ICB in establishing up to three priority practices which either have capacity or have the potential to be extended to accommodate the proposed patient impact.

### ***NHS Local Estates Strategies***

Over the past 10 years, the health sector has seen unprecedented requirements to improve both quality and efficiency, improve patient outcomes whilst facing increasing demand and respond to an ageing demographic with increasingly complex service needs. Nationally, we have a population expanding by eight million people by 2032; we now have almost three million people living with three or more long-term conditions; the number of people living with dementia will double over the next 30 years; and the rate of diabetes will increase by 30% by 2025, affecting some four million people.

The early years of health sector reform created some unpredictability, but the Five Year Forward view (2014) gave greater clarity on the direction and requirements to meet the quality, demand, and efficiency challenges. The General Practice Forward View, NHS England (April 2016) provided further direction for the future of primary care and The NHS Long Term Plan published in January 2019 now sets out the new service model for the 21st Century.

Primary Care is at the forefront of demand for services and will continue to be the bedrock of NHS care as part of an integrated care system. Primary Care is more than ever dependent on

the provision of a modern, fit for purpose and flexible premises (supported by digital systems) from which to operate.

The Black Country ICB Estates Strategy, approved in 2023, represents the Improvement and Development Plan for the Black Country ICB and the continuing evolution of the local and national drivers for change. These are live documents spanning the period 2023 to 2027 and are subject to regular review as strategies and plans continue to evolve in terms of – for example – implementation of the NHS GP Forward View and development of the Integrated Care System. The Black Country ICB Estates Strategy is evidence based and underpinned by 27 individual approved and adopted Primary Care Network (PCN) Estates Strategies. The PCN Estates Strategies and the ICB Estates Strategy form part of the wider Integrated Care System (ICS) Strategy, which combines the ICB Strategy and all of the Secondary Care Provider Trusts Strategies into the ICS Infrastructure Strategy.

These strategies key aims and objectives are listed below and are set out to support the providers of Primary Care Services and our partners in the wider Integrated Care System (ICS) by delivering the most cost effective and best value space from which high-quality services will be provided, supporting the wider communities that we serve. These are:

- Better service integration, driving improvements in service efficiency and better outcomes for our residents.
- Improved capability and capacity for Primary Care provision
- Reduced risk and improve service resilience at local and system levels.
- Supporting the delivery of new models of care
- Increased efficiencies, through the better use of high-quality community and central estate
- Rationalisation and disposal of surplus or unfit estate
- Improving the effective utilisation of the estate
- Maximising future estate flexibility through smart design
- Ensuring the Estate meets the demands of the clinical strategy.
- Improving the quality and condition of the estate
- Building a flexible Estate - Adoption of bookable systems
- Addressing population growth/housing developments and demographic change.

### ***Use of Healthcare Data***

Using available healthcare data from the SHAPE Atlas and Healthcare Strategies enables the NHS to assess the impact of local housing growth in the immediate vicinity of the existing healthcare estate infrastructure. The aim is to consider the volume of new housing being proposed in the locality and assess the impact of the growth upon each individual healthcare premises in the vicinity of impact. The existing premises accommodation, utilisation of space, patient list numbers, population growth capacity and workforce are all factors in the assessment process. Proposed investment is then prioritised according to the ability of the individual healthcare premises to accommodate the housing growth, their potential for expansion and the likelihood of delivery.

## **DEVELOPER CONTRIBUTIONS**

New residential development places additional demand for healthcare facilities and creates a need for new and/or improved services to accommodate this increased demand. The impact of proposed developments on health provision should be assessed and considered at an early stage in the planning process. In most cases, developers will make a financial contribution towards the provision of new or improved healthcare facilities.

### ***Planning Obligations and Funding***

A planning obligation is usually an agreement between interested parties, (e.g., a developer, landowner, and the Council). However, it can also be in the form of a unilateral undertaking (where the developer makes an unconditional promise) that is offered to the Council to make an application acceptable in planning terms.

The ICB secures developer contributions, both financial and non-financial, from development to mitigate the negative impacts of development, address infrastructure needs, contribute towards placemaking and meet Local Plan policy requirements.

The purpose of developer planning obligations is to assist in the provision of new, extended, or reconfigured Healthcare premises to respond to the demands of the additional housing growth and increase in patient demand on the existing Healthcare Infrastructure. The use of planning obligation funds provides a capital contribution towards the creation of additional capacity within the existing healthcare premises in the area of impact of the new development, by extension or reconfiguration of the existing building and site.

However, if this is not possible due to existing site constraints, then contributions should be made towards the provision of a new purpose-built healthcare premises on another site within the vicinity in order to accommodate the required additional capacity.

There are two main mechanisms<sup>1</sup> used to secure infrastructure funding and provision from developers:

- The Community Infrastructure Levy (CIL) (now Infrastructure Levy (LURA 2023))
- Planning obligations under Section 106 of the Town and Country Planning Act 1990 (as amended)

In some circumstances, planning conditions attached to planning permissions may also be used to secure non-financial mitigation, to define timing or apply standards.

### ***Community Infrastructure Levy***

CIL is charged on certain new development in the Borough, in accordance with the Council's CIL Charging Schedule and the CIL Regulations 2010 (as amended). The monies received from CIL are pooled together to help fund infrastructure to support development in the district. CIL has been set at a level that does not threaten the viability and delivery of development identified in the Local Plan.

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<sup>1</sup> As amended by the Levelling-up and Regeneration Act 2023



The Council publishes a CIL Spending Strategy, setting out how the spending of CIL funds will be prioritised and administered. The Council is required to spend CIL on infrastructure and the Council's adopted CIL Spending Strategy allocates funds to stakeholders. The Spending Strategy is regularly reviewed. There are several exemptions and reliefs to CIL that applicants can apply for to reduce or remove the amount of CIL payable.

### **S106 Agreements**

S106 agreements are used to secure the infrastructure required to mitigate the direct impact of a particular development and/or to meet specific planning policy requirements. Developer contributions via S106 can be: financial contributions; affordable housing provision; the provision of land or restriction on the use of land; or the direct delivery of facilities.

As set out in CIL Regulation 122, S106 obligations should only be used to secure infrastructure where:

- necessary to make a development acceptable in planning terms.
- directly related to a development
- fairly and reasonably related in scale and kind to the development.

Government's Planning Practice Guidance states that tariff-style S106 contributions cannot be sought from small-scale, self-build or starter homes developments.

### **Calculating Financial Contributions**

A consistent and fair approach is needed to provide clarity and certainty for developers, in consultation with local healthcare providers. Consequently, a four-stage process is set out below. This will ensure that relevant factors will be considered in a consistent way when determining the appropriate level and type of contribution that is needed.

This includes predicting the likely demands arising from new development, an assessment of how this can be addressed through existing provision, and, if necessary, the level of additional provision needed to meet additional demand. This relates to physical space, such as new build and physical changes to existing premises, rather than the provision of new or additional services, and to capital investment, not revenue costs.

The 4-stage process is as follows:

**Stage 1:** Predicting the level and type of demand the proposal will generate.

*This should be based on the number, size and type of homes proposed, as family housing will inevitably generate a different type and level of demand than say, student accommodation or care homes.*

**Stage 2:** Understanding the likely impact of the proposed development on health infrastructure capacity.

*Informed by existing health infrastructure capacity within the locality, developers should assess whether the level and type of demand could be met by existing provision or if it would likely result in a deficit.*

**Stage 3:** Considering the appropriate additional capacity solution.

*If a need for additional capacity is identified in Stage 2, the developer will need to agree with the Council, in liaison with the health sector, the most appropriate solution. This could be in the form of new health facilities, or extensions or modifications to existing provision.*

**Stage 4:** Considering the appropriate form of developer contribution.

*When required, the appropriate form of developer contribution will generally be either a financial contribution towards the cost of providing new or enhanced facilities; or the provision of land and/or new buildings.*

### **NHS Financing of Infrastructure - Worked Example**

A planning application for a proposed development of ten dwellings or more will require the ICB to carry out a healthcare infrastructure assessment.

The SHAPE database enables the ICB to establish the priority GP practices, which are selected based on current capacity or the potential to extend to accommodate the proposed increase in patient numbers. Establishing up to three options offers some flexibility to accommodate the potential change in landscape as schemes naturally progress through the NHS.

The patient impact number is determined based on an average household of 2.4 people (1.5 for care home facilities) and from this, the number of additional consulting rooms can be calculated using the following formula:

$$\frac{\text{Projected number of residents per development/number of patients}}{\text{per consulting room}} = \text{number of consulting rooms required}$$

The ICB have developed a template using an algebraic formula based on the Health Building Note 11-01 to establish the level of contributions towards healthcare infrastructure which would be sought from the developers.

A worked example of this template can be found below based on construction cost as of 2021 from the competitive tendering process carried out during that period and is subject to variation in accordance with the BCIS all-in *Tender Price Index for Health Centres, Clinics, Group practice and Surgeries* plus 15% for fit out and external costs:

### Calculating number of consulting/examination rooms required for general medical services:

Description/Activity	Calculation	Comments
Number of Dwellings Proposed by the Development	<b>166</b>	Insert number of units
Number of Persons Accommodated in the Proposed Development (=2.4 per dwelling x number of units)	398	
<b>Health Building Note 11-01: facilities for primary and community care services:</b>		
Catchment population: Created by Development	398	0.3984
Access rate: (=5,260 per 1,000 population)	5.26	
Anticipated annual contacts:	2,096	
Assume 100% patients use C/E room: Patients accessing a C/E room:	2,096	1
Assume open 50 weeks a year: (=52,600 / 50) Patients per week:	42	
Appointment duration	15 Minutes	
Patient appointment time per week: (=1,052 x 15 / 60)	10.47792	15
Assume Building Operational (hours per week)	60	
Rooms Available (hours per week)	36	
Number of Consulting Rooms Required: (=236/36)	0.29	
Area of Consulting Room including support areas and access etc, 16 msq plus 20%	19.2	
Build costs will be based on BCIS all-in Tender Price Index for Health Centres, Clinics, Group practice and Surgeries plus 15% for fit out and external costs	<b>£3,722.39</b>	Insert build costs based on recent tenders received
Cost per each Consulting Room	£71,469.89	
<b>Contribution towards Consulting Room Healthcare Development</b>	<b><u>£20,801.55</u></b>	

### Calculating number of treatment rooms required for general medical services:

Description/Activity	Calculation	Comments
Number of Dwellings Proposed by the Development	166	Insert number of units
Number of Persons Accommodated in the Proposed Development (=2.4 per dwelling x number of units)	398	
<b>Health Building Note 11-01: facilities for primary and community care services:</b>		
Catchment population: Created by Development	398	0.3984
Access rate: (=5,260 per 1,000 population)	5.26	
Anticipated annual contacts:	2,096	
Assume 20% patients use C/E room: Patients accessing a C/E room:	419	0.2
Assume open 50 weeks a year: (=52,600 / 50) Patients per week:	8	
Appointment duration	20 Minutes	
Patient appointment time per week: (=1,052 x 20 / 60)	2.79	20
Assume Building Operational (hours per week)	60	
Rooms Available (hours per week)	36	
Number of Treatment Rooms Required: (=236/36)	0.08	
Area of Treatment Room including support areas and access etc, 18 msq plus 20%	21.6	
Build costs will be based on BCIS all-in Tender Price Index for Health Centres, Clinics, Group practice and Surgeries plus 15% for fit out and external costs	£3,722.39	Insert build costs based on recent tenders received
Cost per each Treatment Room	£80,403.62	
<b>Contribution towards Treatment Room Healthcare Development</b>	<b><u>£6,240.46</u></b>	

### Calculating secondary/community healthcare medical services:

Description/Activity	Calculation	Comments
Number of Dwellings Proposed by the Development	166	Insert number of units
Number of Persons Accommodated in the Proposed Development (=2.4 per dwelling x number of units)	398	
<b>National NHS cost collection data for secondary/community care services:</b>		
Catchment population: Created by Development	398	0.3984
Development Activity Rate per head of population:	4.5	
Cost per Activity	73.91	
Total Cost to the Developer for NHS Secondary Care	<b><u>132,506</u></b>	
<b>Contribution towards Secondary/Community Healthcare Infrastructure</b>	<b>£159,547.86</b>	
Cost per Dwelling/Unit	£961.13	

Once the assessment is complete and the contribution requirement has been calculated, the ICB will then issue a formal consultation response to the relevant Local Planning Authority.

### ***Non-monetary Contribution/Payment in Kind***

Whilst in the majority of cases developers will be expected to pay a monetary contribution towards the provision or improvement of facilities, there may be circumstances where a new or expanded healthcare facility may be capable of being incorporated within a new development.

This is most likely to be the case where:

- a major development is being promoted in a location where new or improved healthcare facilities will be needed, as a consequence of that development. In such circumstances it may be expedient and more cost-efficient for the developer to deliver a healthcare facility; or
- the development includes the redevelopment of an existing healthcare facility, land adjoining an existing healthcare facility, other publicly owned land, or land allocated in the current development plan for a healthcare facility.

Given that such circumstances are likely to be exceptional, the developer should enter into discussions with the ICB prior to the grant of planning permission – and preferably at the earliest possible opportunity during the pre-application process.

In order to agree a S106 obligation that meets the relevant tests and the needs of the healthcare system, the ICB will have regard to a range of factors including:

- the monetary contribution that the development would have otherwise been liable for.
- public procurement requirements.
- whether a 'Payment in Kind' facility is capable of meeting the identified need and, if not, the availability of other funding to supplement the Payment in Kind.
- where freehold premises are not being delivered, the ability of the proposed site or facility to meet the longer-term needs of the ICB as well as any ongoing lease-related costs.
- any ongoing management or service charge costs; and
- the ability of the facility to be independently accessed by all members of the community, including provision of car parking for the mobility impaired and on-call staff, and the provision of satisfactory vehicular access and servicing arrangements according to the nature of the use.

Where agreement on a Payment in Kind cannot be reached, a monetary contribution will be sought using the worked Calculation.

Where a Payment in Kind healthcare facility is proposed, this should be clearly explained and illustrated in the Planning Application submission.

To secure delivery of the Payment in Kind healthcare facility the S106 Agreement should, as a minimum, include the following:

- a general development specification as agreed with the ICB.
- the time period from commencement of development by which the healthcare facility be delivered in accordance with the agreed development specification; and
- an agreed monetary contribution which will be paid along with indexation to the LPA in the event that the healthcare facility is not delivered within the agreed timescale.

**Monitoring and Reporting**

The Council will monitor compliance with legal agreements, to ensure payment of financial and/or delivery of non-financial contributions. The allocation and expenditure of developer contributions, together with the progress of works to increase healthcare capacity will be monitored.

Developers entering into agreements are required to pay a monitoring fee to cover costs incurred in monitoring developer contributions. The fee will depend on the nature and complexity of the contribution being monitored. All monitoring fees will be subject to indexation and payable at the commencement of the development.

If developers fail to comply, the Council will enforce developer contributions through the relevant legal channels once all reasonable approaches have been exhausted. In such cases, the Council will seek to retrieve the costs of taking action against the developer that is in breach of its legal agreement.

The Council is required to publish information on monies received and spent relating to new developments secured through s106 agreements. This information is published in a document known as an Infrastructure Funding Statement and can be found on the website

## GLOSSARY OF TERMS

**Care Quality Commission (CQC)** - regulates all health and social care services in England. The commission ensures the quality and safety of care in hospitals, dentists, ambulances, and care homes, and the care given in people's own homes.

**Directors of Public Health (DPH)** - a statutory chief officer of their authority, accountable for the delivery of public health responsibilities, and the principal adviser on all health matters to elected members and officers.

**Integrated Care Board (ICB)** - a statutory NHS organisation which is responsible for developing a plan for meeting the health needs of the population, managing the NHS budget and arranging for the provision of health services in a geographical area.

**Integrated Care Board (ICB) - Strategic Plan** - is to set the strategic direction and priorities for the provision of health and care services across the Integrated Care System.

**Integrated Care System (ICS)** - a statutory partnership of organisations who plan, buy, and provide health and care services in their geographical area. The organisations involved include the NHS, local authorities, voluntary and charity groups, and independent care providers.

**Lower Layer Super Output Area (LSOA)** - is a geographical area and are a geographic hierarchy designed to improve the reporting of small area statistics in England and Wales.

**Primary Care Network (PCN)** - is a structure which brings general practitioners together on an area basis, possibly with other clinicians, to address chronic disease management and prevention.

**Strategic Health Asset Planning and Evaluation (SHAPE)** - is a web enabled, evidence based application that informs and supports the strategic planning of services and assets across the public sector.



## APPENDIX I

# National Planning Policy & Practice for Healthcare

### *National Planning Policy Framework*

The NPPF (or ‘the Framework’) was first published on 27 March 2012 and updated on 24 July 2018, 19 February 2019, 21 July 2021 and most recently on 20 December 2023. This sets out the government’s planning policies for England and how these are expected to be applied. It provides a framework within which locally prepared plans for housing and other development can be produced.

Chapter 8 is entitled ‘Promoting healthy and safe communities’. It expects Planning policies and decisions to aim to achieve healthy, inclusive and safe places which ‘*enable and support healthy lifestyles, especially where this would address identified local health and well-being needs*’ (para 96(c)). Planning policies and decisions should ‘*take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community*’ (para 97 (b)).

The December 2023 version also contains this relevant paragraph:

**100.** *To ensure faster delivery of other public service infrastructure such as further education colleges, hospitals and criminal justice accommodation, local planning authorities should also work proactively and positively with promoters, delivery partners and statutory bodies to plan for required facilities and resolve key planning issues before applications are submitted.*

### *Planning Practice Guidance*

#### **Healthy and safe communities**

How can positive planning contribute to healthier communities?

The design and use of the built and natural environments, including green infrastructure are major determinants of health and wellbeing. Planning and health need to be considered together in two ways: in terms of creating environments that support and encourage healthy lifestyles, and in terms of identifying and securing the facilities needed for primary, secondary and tertiary care, and the wider health and care system (taking into account the changing needs of the population).

Public health organisations, health service organisations, commissioners, providers, and local communities can use this guidance to help them work effectively with local planning authorities to promote healthy and inclusive communities and support appropriate health infrastructure.

*Paragraph: 001 Reference ID:53-001-20190722*

*Revision date: 22 07 2019*

#### **What are the main health organisations that need to be involved in considering planning for health?**

Engagement between plan-making bodies and relevant organisations will help ensure that local strategies to improve health and wellbeing and the provision of the required health

infrastructure are supported and considered in plans (including in the preparation of strategic policies for community facilities). Where these comprise strategic cross-boundary matters, agreements, joint working and progress can be documented in statements of common ground.

The first point of contact on population health and wellbeing issues, including health inequalities, is the Director of Public Health for the local authority, or at the county council for two-tier areas.

Working with the advice and support of the Director of Public Health, plan-makers may also need to involve the following key groups in the local health and wellbeing system:

- Health and Wellbeing Boards encourage integrated working among commissioners of services and functions of local government (including planning) for the advancement of the health and wellbeing of people in their area. Each Board is responsible for producing a Health and Wellbeing Strategy which is underpinned by a Joint Strategic Needs Assessment. This will be a key strategy for a local planning authority to take into account to improve health and wellbeing. Other relevant strategies to note would cover issues such as obesity and healthy eating, physical activity, dementia care and health inequalities. Data and information from Public Health England is also useful as part of the evidence base for plan-making.
- NHS England and local Clinical Commissioning Groups are responsible for the planning and commissioning of high-quality healthcare services and facilities for their local area. These bodies are consultees for local plans. They can provide information on their current and future strategies to refurbish, expand, reduce or build new facilities to meet the health needs of the existing population as well as those arising as a result of new and future development.
- Sustainability and Transformation Partnerships are about redesigning services around the needs of whole areas, not just individual organisations. They bring together NHS providers, commissioners and local authorities and other health and care services to run services in a more coordinated way to agree system-wide priorities, and to plan collectively how to improve the health of local communities. They will evolve into Integrated Care Systems making faster progress across their areas, bringing together organisations to provide more seamless care for patients. They also produce strategic estates plans which should be the basis of health infrastructure engagement with plan-making bodies.
- Local Healthwatch organisations understand the needs, experiences and concerns of people who use health and social care services in their area. Engagement with the wider local community is also important.

*Paragraph: 002 Reference ID:53-002-20190722*

*Revision date: 22 07 2019*

### **What is a healthy place?**

A healthy place is one which supports and promotes healthy behaviours and environments and a reduction in health inequalities for people of all ages. It will provide the community with opportunities to improve their physical and mental health, and support community engagement and wellbeing.

It is a place which is inclusive and promotes social interaction. The National Design Guide sets out further detail on promoting social interaction through inclusive design including guidance on tenure neutral design and spaces that can be shared by all residents.

It meets the needs of children and young people to grow and develop, as well as being adaptable to the needs of an increasingly elderly population and those with dementia and other sensory or mobility impairments.

*Paragraph: 003 Reference ID:53-003-20191101*

*Revision date: 01 11 2019 See previous version*

**How can the need for health facilities and other health and wellbeing impacts be considered in making planning policies and decisions?**

Plan-making bodies will need to discuss their emerging strategy for development at an early stage with NHS England, local Clinical Commissioning Groups, Health and Wellbeing Boards, Sustainability and Transformation Partnerships/Integrated Care Systems (depending on local context), and the implications of development on health and care infrastructure.

It is helpful if the Director of Public Health is consulted on any planning applications (including at the pre-application stage) that are likely to have a significant impact on the health and wellbeing of the local population or particular groups within it. This would allow them to work together on any necessary mitigation measures. A health impact assessment is a useful tool to use where there are expected to be significant impacts.

Information gathered from this engagement will assist local planning authorities in considering whether the identified impact(s) could be addressed through planning conditions or obligations.

Alternatively, local planning authorities may decide the identified need could be funded through the Community Infrastructure Levy.

*Paragraph: 005 Reference ID:53-005-20190722*

*Revision date: 22 07 2019*

## **APPENDIX II**

### ***Explanation of the Worked Example***

The following is extracted from the Department of Health, Primary and Community Care, *Health Building Note 11-01: Facilities for Primary and Community Care Services*, and describes the process by which the spaces in primary and community care buildings (excluding community wards) are quantified, and from that, how a briefing schedule can be generated, and contributions can be calculated.

The briefing schedule will be used to produce an informed construction cost and hence to determine whether the scheme is viable or whether basic assumptions (such as functional content, opening hours etc) have to be adjusted to achieve affordability. It is vital that the briefing schedule is created very early in the development process to avoid abortive work being undertaken.

The briefing schedule can also be used to establish approximate car parking numbers to assist with site capacity planning and inform discussions with LPA, where relevant.

#### ***Primary and community care spaces***

This is the most complex element to define because, most primary and community care spaces will be shared by a variety of users on a timetabled basis.

Primary and community care spaces can be established using the following steps:

- establish the range of primary and community care services to be delivered.
- establish the anticipated activity levels for each service.
- establish the types of patient/clients contact space required for each service.
- state operational assumptions.
- calculate the number of patient/clients contact spaces required for each service.
- calculate the total number of patient/clients contact spaces required.
- establish the number of support spaces required.

These steps are discussed in more detail below.

#### ***Establish the range of primary and community care services to be delivered.***

The service brief will provide this information.

#### ***Establish the anticipated activity levels for each service.***

The number of patient/client contacts per annum for each service can be calculated using:

- access rates applied to the relevant catchment population; and/or
- outputs from service redesign pathways; and/or
- historical activity levels, modified to reflect planning assumptions on trends.

#### ***Establish the types of patient/clients contact space required for each service.***

The primary and community care room directory may aid this process. These spaces can be generic or specialist.

Most individual services will require access to more than one room type, for example general medical services require access to both consulting/examination and treatment rooms. Where an individual service requires access to more than one room type it is necessary to identify the percentage of patients/clients using each room type; for example, analysis may show that 100% of GMS patients/clients require access to a consulting/examination room but only 20% require access to a treatment room.

***State operational assumptions***

To enable patient/client contact spaces to be quantified, assumptions about the following operational issues will be required:

- number of weeks the building will be open per year.
- opening hours per week.
- average duration of each appointment by service and room type.
- average room utilisation rate.

The room utilisation rate allows for non-attendees, unplanned activity, and the complexity of scheduling a variety of staff. A utilisation rate of at least 60% should be achieved. However, the impact on room requirements of using a higher utilisation rate should be investigated.

***Calculate the number of patient/clients contact spaces required for each service.***

The examples below illustrate how this can be done for general medical services using the steps outlined above.

Requirements for specialist patient/client contact spaces should be determined in the same way. However, the decision to provide a specialist room will also depend on whether they can be delivered in a generic room.

**Appendix B1 – Natural England Issues & Options Rep.**

Date: 30 November 2018  
Our ref: 261098  
Your ref: Issues and Options



**South Staffordshire Council**

**BY EMAIL ONLY**

Customer Services  
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Dear Sir/Madam

**Planning consultation:** 261098 South Staffordshire Council Local Plan Review – Issues & Options  
October 2018

**Location:** South Staffordshire Council

Thank you for your consultation on the above dated 8 October 2018 which was received by Natural England on the same day.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England has reviewed the content of the report and we offer our comments on the various questions below. Please get in touch if you have any questions and we look forward to further dialogue with you over those aspects of the plan warranting further discussion.

Question 1:

Are there any other strengths, weaknesses, opportunities and threats to South Staffordshire that you feel should be identified in the Local Plan? If yes, then please provide details. Should anything be deleted?

Local Plan issues and challenges

**3.30 Protecting the Green Belt and understanding which areas of South Staffordshire's Green Belt make the most contribution to the purposes of Green Belt policy.**

We welcome and acknowledge that you raise this aspect of Green Belt policy at this point in the document and recognise that ecological assets afforded by the Green Belt are dealt with later on in the document in Chapter 9.

**3.32 Understanding the landscape character and, where possible, protecting the most sensitive areas is therefore a key issue for the Local Plan.**

We welcome and acknowledge that you raise the aspect of understanding landscape character at this point and recognise that landscape issues are dealt with later on in the document in Chapter 9.

### **3.33 Protecting, conserving and enhancing the district's rich natural environment and ecological and assets.**

We welcome and acknowledge that you raise the aspect of Protecting, conserving and enhancing the district's rich natural environment at this point.

The varied landscape in the district is also home to a rich biodiversity resource providing many types of habitats including Special Areas of Conservation (SACs), National Nature Reserve (NNR), Local Nature Reserves (LNRs), Sites of Biological Importance (SBIs), and Sites of Special Scientific Interest (SSSIs). There are also important areas of lowland heath such as Shoal Hill Common in Cannock Chase Area of Outstanding Natural Beauty (AONB). The western fringe of the Cannock Chase AONB lies within the district and is valued for its high landscape quality, wildlife and recreational value, and there is a statutory obligation to protect and manage the area. Within the AONB lies an area of lowland heath which is protected further by Special Area of Conservation (SAC) status.

The agricultural land within the district ranges from the best quality grade 1 down to grade 3b. The best and most versatile agricultural land is classified as grades 1 and 2. Conserving and protecting valued finite natural resources is a key issue to consider when planning new development

### **3.34 Ensuring sufficient good quality public open spaces and green infrastructure is available for residents and visitors to the district**

We welcome that you raise the aspect of provision of public open spaces and green infrastructure and recognise that related issues are dealt with later on in the document in Chapter 7 Health and Wellbeing.

Question 2:

Are there any other issues that the Local Plan can address in South Staffordshire? Are the issues and challenges appropriate and sufficient to inform the Local Plan? If not, what should be added or deleted?

Sustainability Appraisal

The reliance on the private car for transport will need to be considered in relation to Sustainability Appraisal e.g. with regard to air quality impacts from increased traffic generation.

Question 3:

Do you have any comments on the vision, and objectives to deliver the vision set out above? If yes, then please provide details.

We welcome the Vision for South Staffordshire and in particular welcome the vision statement under 'the natural environment'. However, in order to ensure that it takes account of the latest evidence and thinking in relation to the natural environment we would welcome the opportunity to discuss with the Council those themes and issues covered in the recently published government document 'A Green Future – Our 25 year plan to improve the environment' and how in practice these may result in any amendments to the vision for the district : link

[25-year-environment-plan](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf)

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/693158/25-year-environment-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf)

We welcome the following in particular welcome under 'environment'

11) Safeguard and enhance the district's landscape character, green infrastructure and natural



environment

12) Enhance the built environment including conserving and enhancing district's heritage assets.

13) Ensure that our communities are resilient to the effects of climate change ensuring development does not increase the risk of flooding to new and existing properties

10) We welcome the following comments under 'Green Belt'

- '....including improving access to the countryside and ecological and biodiversity enhancement, are made.'

Question 4:

Do you think that the key evidence set out in Table 3 is sufficient to support the preparation of the Local Plan review? If not, what additional evidence is required?

We offer the following comments on some of the detail on evidence:

European sites

General comment – Conservation objectives for European Sites are subject to review and the updated documents including 'supplementary advice packages' are available at:

Weblinks:

West Midlands sites - <http://publications.naturalengland.org.uk/category/5134123047845888>

East Midlands Sites - <http://publications.naturalengland.org.uk/category/6071598712881152>

Case law - Cannock Chase SAC – Appendix B refers to the Wealden Judgement<sup>1</sup> with specific respect to this SAC. We welcome the acknowledgment of this ruling but given its relevance to 'in combination assessment' as part of HRA in general we would encourage the Council to consider the implications of the ruling to any European Sites being considered as part of the HRA work for the local plan review.

We would also draw the Council's attention to the following rulings in relation to European Sites and HRA:

'Moorburg' –

*Judgment of the Court (Second Chamber) of 26 April 2017*

*European Commission v Federal Republic of Germany*

*Failure of a Member State to fulfil obligations — Environment — Directive 92/43/EEC — Article 6(3) —*

*Conservation of natural habitats — Construction of a coal-fired power plant in Moorburg (Germany) — Natura 2000 areas situated upstream of that coal-fired power plant on the corridor of the Elbe river — Assessment of the implications of a plan or project for a protected site - Case C-142/16*

Theme - Unregulated activities and historic consents, their influence on European Site condition and consideration during HRA of plans and projects.

'Sweetman2'

*Judgment of the Court (Seventh Chamber) of 12 April 2018*

*People Over Wind, Peter Sweetman v Coillte Teoranta,*

*Reference for a preliminary ruling — Environment — Directive 92/43/EEC — Conservation of natural habitats —*

*Special areas of conservation — Article 6(3) — Screening in order to determine whether or not it is necessary to carry out an assessment of the implications, for a special area of conservation, of a plan or project —*

*Measures that may be taken into account for that purpose) - Case C-323/17*

### Habitats Regulation Assessment (HRA)

#### 3.44

Please refer to our comments regarding the case law known as the Wealden judgement and implications for the assessment of 'in combination' effects upon European sites under the Habitats Regulations 2017. This may entail further cross border working with neighbouring planning authorities and stakeholders (e.g. highways authorities) in order to gather suitable evidence.

We welcome item 3.46 which states that 'A separate suite of joint studies are being updated with adjoining authorities in relation to Cannock Chase SAC to underpin the Local Plan review' and that further information on the HRA process and the mitigation required for Cannock Chase SAC is

available.

### Cannock Chase SAC

'Natural England notes and welcomes the Council's long standing, active participation in the Cannock Chase SAC Partnership. This partnership project has commissioned work to review the project evidence base in order to ensure that the agreed mitigation measures ('Strategic Access Management and Monitoring Measures') remain fit for purpose. This ongoing work may involve the identification of additional or different measures to reflect an increase in the scale of housing and/or changes in other relevant considerations such as the location of such development relative to, and road linkages with, the SAC

#### Question 5:

Is the information contained in the Infrastructure Delivery Plan October 2018 the most up to date? If not please provide details. Are there any other specific infrastructure issues that the Local Plan should look to address? If no, then what further evidence is required?

We welcome the proposed introduction of a Community Infrastructure Levy (CIL)

Natural England Supports the proposals for a Strategic Infrastructure Tariff, which presents opportunities to deliver strategic environmental projects that deliver environmental gains.

#### Question 6:

Do you agree that Option C represents an appropriate and proportionate housing target for the Local Plan review, having regard to the Council's own needs and the needs of the wider Greater Birmingham Housing Market Area?

We have no specific comments to offer on the district's role at this stage. We would be happy to discuss any relevant considerations arising from this at a later date.

Question 7: No comment

Question 8: No comment

#### Question 9:

The NPPF requires us to approach all neighbouring authorities before releasing Green Belt for unmet housing needs and to plan for cross-boundary needs over the most appropriate functional geography. In light of this, is the Greater Birmingham Housing Market Area the most appropriate geography over which to address unmet housing needs?

Safeguarded land/reserve housing sites

We have no specific comments to offer on the district's role at this stage. We would be happy to discuss any relevant considerations arising from this at a later date.

Question 10: No comment

Question 11: No comment

Question 12: No comment

Question 13: No comment

Question 14: No comment

Question 15: No comment

Retail – level of growth

Question 16:

Can the Council continue to rely on its existing approach to meeting the retail needs of the district in the existing village centres and the facilities in the adjacent urban area? Is any other evidence required to support the retail needs of future development areas in the district?

We have no specific comments to offer on the Council's role at this stage. We would be happy to discuss any relevant considerations arising from this at a later date.

Question 17: No comment

Question 18: No comment

Question 19: No comment

Question 20: No comment

Question 21: No comment

Question 22: No comment

Question 23: No comment

Question 24: No comment

Question 25: No comment

Question 26: No comment

Question 27: No comment

Question 28: No comment

Question 29: No comment

Question 30: No comment

Question 31: No comment

Question 32: No comment

Question 33: No comment

Question 34: No comment

Question 35: No comment

Question 36: No comment

Question 37:No comment

Question 38:No comment

Question 39:No comment

Question 40:No comment

Question 41:

Which of the option(s) do you think should be pursued? Are there any other options/design measures to consider?

We would welcome the Option C.

Question 42:

No comment

Question 43:

No comment

Question 44:

No comment

Question 45:

No comment

Health and wellbeing policy options

Question 46:

Which of the option(s) do you think should be pursued? Are there any other options/design measures to consider?

We would welcome Option A

Table 24: Leisure facilities policy options

Question 47:

No comment

Question 48:

No comment

Question 49:

Children's play and youth development

Natural England is actively promoting the health and educational benefits which are to be derived from access to play and learning opportunities in the natural environment. We welcome reference to this in the document as it recognises that contact with nature can play an important role in educational and social development.

7.77 Promote the connection between natural environments and children and young people to encourage 'nature play'.

Question 50:No comment

Question 51: No comment

Question 52: No comment

Question 53: No comment

Question 54: No comment

Question 55: No comment

Question 56: No comment

Question 57: No comment

Question 58: No comment

#### 8.10 **Promote policies which support the growth of the tourism sector.**

In relation to possible tourism opportunities these will need to be located away from protected and designated sites. Access needs careful consideration to ensure appropriate location and also consideration for historic environments.

#### 8.11 **Potential conflicts between e**

Question 59: No comment

Question 60: No comment

Question 61: No comment

Question 62: No Comment

Which of the option(s) do you think should be pursued? Are there any other options to consider?

Natural England welcomes 8.27 **A need to provide sufficient, physical, social and green infrastructure (GI) to directly support new development coming through the Local Plan.** This will allow for consideration of GI at an early stage in the planning process.

We also support the **need to ensure that mechanisms are in place for maximising new infrastructure** eg. through (8.28) Community Infrastructure Levy (CIL)

We would be happy to discuss any relevant considerations arising from this at a later date.

Question 63:

Which of the option(s) do you think should be pursued? Are there any other options to consider?

Option B would be supported by Natural England

Question 64: No Comment

Question 65: Option B

Question 66: No comment

Question 67: No comment

Question 68: No comment

Question 69: No comment

Chapter 9. Natural and Built Environment

Table 34: Green Belt policy options

Question 70:

Which of the option(s) do you think should be pursued? Are there any other options to consider?

Natural England welcomes the following approach

9.3. A range of potential uses has been identified including enhanced sport and recreation, support for biodiversity and green networks, improvements in accessibility and landscape enhancements. This approach will encourage a 'net gain' for biodiversity.

National policy has introduced the idea of natural capital into planning policy. The idea of natural capital is an attempt to capture the economic and social benefits that are derived from the natural environment, and should be recognised and enhanced within the planning system. One of the key objectives of the planning system is now identified as providing 'net gains' for biodiversity,

Question 71: No comment

Question 72:

Which of the option(s) do you think should be pursued? Are there any other options to consider?

We would welcome Option B:

In addition to Option A, undertake further landscape evidence to identify key strategic gaps/areas of restraint surrounding settlements that should be protected and enhanced.

We would welcome an approach that would look positively on key aspects of landscape and we would welcome Natural England input into this area.

Question 73:

**Landscape character policy options**

Which of the option(s) do you think should be pursued? Are there any other options to consider?

**Option B:**

**In addition to Option A, undertake further landscape evidence to identify key strategic gaps/areas of restraint surrounding settlements that should be protected and enhanced.**

Table 37: Natural environment policy options

Natural England welcomes 9.16 **Integrating designated nature conservation sites into a**

## **wider interconnected Green Network, planning on a landscape scale.**

Natural England strongly supports the net gain for biodiversity approach and wishes to support a Strategic approach to Green Infrastructure(G.I.) and net gain (NPPF 2018) There are clearly many benefits of G.I. and of ecological networks as referred to in the document and Natural England would take the opportunity to work with the Council and with the Partnerships on these themes.

Question 74:

### **Natural environment policy options**

Which of the option(s) do you think should be pursued? Are there any other options to consider?

### **Natural environment policy options**

Option B is strongly supported

#### **Option B:**

**Continuing the approach to protecting the hierarchy of designated sites however with a clearer and more positive approach to the development of a green/ecological network including measures for biodiversity offsetting.**

## **Cannock Chase AONB and SAC**

Question 75:

We believe that Core Strategy Policy EQ2 should be updated to accord with the emerging evidence for the SAC set out above; do you agree with this approach and are there any other options to consider?

*'Natural England notes and welcomes the Council's long standing, active participation in the Cannock Chase SAC Partnership. This partnership project has commissioned work to review the project evidence base in order to ensure that the agreed mitigation measures ('Strategic Access Management and Monitoring Measures') remain fit for purpose. This ongoing work may involve the identification of additional or different measures to reflect an increase in the scale of housing and/or changes in other relevant considerations such as the location of such development relative to, and road linkages with, the SAC. The local plan review should include clear reference to this important strand of work within the local plan's evidence base. Natural England remains committed to advising the Partnership on the identification and implementation of suitable measures into the future. We also draw your attention to our advice in relation to the revised NPPF (2018) on the subjects of a strategic approach to green infrastructure and environmental and biodiversity related 'net gain'.'*

The Core Strategy acknowledges that the highest status of protection of the landscape and scenic beauty should be afforded to sites within the AONB. The emphasis within policy EQ4 is on the conservation and enhancement of the landscape, nature conservation and recreation interests of the AONB area.

The South Staffordshire border adjoins the south-western edge of Cannock Chase AONB. The viewpoints from the western edge of the AONB need to be identified as part of local plan review work. This should be addressed as part of the plan's evidence base work through 'landscape sensitivity and capacity analysis'. We therefore would evidence gathering close to the AONB and use of Character Area information

ref.National Character Areas Cannock Chase AONB

[national-character-area-profiles-data-for-local-decision-making](#)

Question 76:

What are your views on the level and variety of open space provision in the district? Should there be a greater emphasis on a particular type of open space (e.g. incorporating natural and semi natural

elements)?

We welcome the approach of a 'Green Infrastructure' network -as described in the document.. These networks provides residents with easy access to green spaces and recreational and informal leisure opportunities that can support health and wellbeing.

Natural England would encourage incorporating more natural and semi-natural elements in open space provision. The ANGST standards are useful in assessing Access to Open Space provision and accessible natural greenspace, as defined in 9.3 of the document. [ANGST Standards](#)  
Natural England also promotes Green Flag Awards for greenspaces that have good community engagement and the environment.  
[Green Flag Awards for Greenspaces](#)

Question 77:

We welcome a Review the Open Spaces Standard

Question 78:No comment

9.45

**9.45 To ensure that new development take account of the effects of pollution.**

Air and water quality and the impacts of noise and light pollution are key considerations which can arise as a result of new development proposals.

-Sustainability Appraisal-

The reliance on the private car for transport will need to be considered in relation to Sustainability Appraisal e.g. with regard to air quality impacts from increased traffic generation.

Question 79:No comment

Question 80:No comment

Question 81:No comment

Question 82:No comment

Question 83:No comment

Question 84:No comment

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Kristina Cox on 07900608043. For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely





**Appendix B2 – Natural England Preferred Options Rep.**

Date: 22 December 2021  
Our ref: 371890  
Your ref: South Staffordshire Local Plan Review Preferred Options Consultation



Planning Policy Team,  
South Staffordshire Council

**BY EMAIL ONLY**

Hornbeam house  
Crewe Business Park  
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T 0300 060 3900

Dear Sir/Madam

**Subject: South Staffordshire Local Plan Review Preferred Options Consultation**

Thank you for your consultation dated and received by Natural England on 21 October 2021.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

**South Staffordshire Local Plan Review Preferred Options document**

**Question 1:**

***Do you agree that the evidence base set out in Appendix A is appropriate to inform the new Local Plan?***

No.

***Please provide comments on the content or use of the evidence base set out in Appendix A, referencing the document you are referring to.***

Natural England would advise that the evidence base is not complete and we refer you to Annex A below for advice on sources of local plan evidence on the natural environment.

**Question 2:**

**(a) Do you agree that the correct infrastructure to be delivered alongside proposed site allocations been identified in the IDP?**

Please see below.

**(b) Is there any other infrastructure not covered in this consultation document or the IDP that the Local Plan should seek to deliver?**

Yes. The Nature Recovery Network. The local plan evidence base includes the [South Staffordshire District Nature Recovery Network Mapping](#) but the IDP does not reflect this evidence. The IDP should include the [nature recovery network](#) and in line with the [25 Year Environment Plan](#) take into account opportunities for nature recovery identified in the South Staffordshire District Nature Recovery Network Mapping.

**Question 3:**

**a) Have the correct vision and strategic objectives been identified?**

Natural England advises that the Plan's vision and emerging development strategy should address

impacts on and opportunities for the natural environment and set out the environmental ambition for the plan area. The plan should take a strategic approach to the protection and enhancement of the natural environment, including providing a net gain for biodiversity, considering opportunities to enhance and improve connectivity. Where relevant there should be linkages with the Biodiversity Action Plan, Local Nature Partnership, Nature Recovery Network, Rights of Way Improvement Plans and Green Infrastructure Strategies.

**b) Do you agree that the draft policies (Chapters 4 and 5) and the policy directions (Chapter 6) will deliver these objectives? Yes/No**

Please see our comments below in relation to the relevant chapters.

**Question 4:**

**Do you support the policy approach in Policy DS1 – Green Belt and Policy DS2 – Open Countryside? Yes/No**

**If no, please explain how these policies should be amended?**

In relation to the aspects of the Policy DS1-Green Belt which are within Natural England's remit, we support the recognition of opportunities to enhance the beneficial use of the green belt. The green belt has the potential to deliver more positive benefits for the natural environment and people's enjoyment of it and to play a role in climate change adaptation. Opportunities should be taken to link into green infrastructure and ecological networks, both within the urban areas and with the open countryside.

Policy DS2 – Open Countryside. We have no comments to make about this policy.

**Question 5:**

**Do you support the policy approach in Policy DS3 – The Spatial Strategy to 2038? Yes/No**

**If no, please explain how this policy should be amended?**

We have no comments to make.

**Question 6:**

**Do you support the policy approach in and Policy DS4 – Longer Term Growth Aspirations for a New Settlement? Yes/No**

**If no, please explain how this policy should be amended?**

Any new proposed settlement would need to be located where it would not impact on designated sites. We welcome the green infrastructure and health section and the future proofed section. We would advise that you think about water quality, air quality and minimising impacts on soil and in line with paragraph 174e) of the [National Planning Policy Framework](#) look to "improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; ".The new settlement should be designed to minimise any environmental impacts including climate change emissions as well as contributing to the environment and ecological networks. Within the settlement there should be green /natural space equality. See the following for further information: [Green Space, equality, and fairness](#). We advise referring to Natural England's work on [Accessible Natural Greenspace Standard \(ANGSt\)](#) and [Accessible Natural Green Space Standards in Towns and Cities: A Review and Toolkit for their Implementation](#).

You may find it helpful to look at the [Eco-towns advice worksheets](#) which provide information on good practice in new development in terms of sustainable development.

**Question 7:**

**a) Do you support the proposed strategic housing allocations in policies SA1-SA4? Yes/No**

**If no, please explain your reasons for this.**

We provide the following advice on the proposed allocations:

- Strategic housing allocations in policies SA1-SA4 are within 15km of Cannock Chase SAC and will therefore have potential recreational impacts on Cannock Chase SAC.
- The allocations have the potential to have air quality impacts on designated sites and this should be assessed further to understand the impacts.
- We note that all the sites are within agricultural land classification (ALC) 2 and 3 as identified by the Agricultural Land Classification - Provisional (England) mapping available from Natural England. Best and most versatile land is considered to be ALC 1,2 and 3a. Best and most versatile land and soil generally should be safeguarded in line with paragraph 174 a) and b) of the [National Planning Policy Framework](#) or the government's [25 Year Environment Plan](#). See also relevant section in Additional comments/advice.
- The allocations should contribute to the nature recovery network.

**b) Do you agree that given the scale of the 4 sites detailed in policies SA1-SA4, these warrant their own policy to set the vision for the site, alongside a requirement for a detailed masterplan and design code?**

Yes.

#### **Question 8:**

**Do you support the proposed housing allocations in Policy SA5? Yes/No**

**Please reference the site reference number (e.g site 582) for the site you are commenting on in your response.**

We provide the following advice on the proposed allocations:

- Cannock Chase SAC and recreational impacts. Any sites within 15km of Cannock Chase SAC will have potential recreational impacts on Cannock Chase SAC.
- Air quality impacts. They are also potential air quality impacts on designated sites from the proposed allocations. A traffic assessment will be required to understand what the potential impacts of the allocations will be. See also our advice under Habitats Regulation Assessment.
- Soils (Including best and most versatile land - BMV). We note the high proportion proposed allocations taking place on greenfield land and the lack of comprehensive information on the where the best and most versatile land (ALC grades 1-3a) is within the district.

You may want to check the following links to establish whether they offer additional information you were not previously aware of:

The 1:250 000 ALC dataset can be downloaded from the Natural England website [http://www.gis.naturalengland.org.uk/pubs/gis/GIS\\_register.asp](http://www.gis.naturalengland.org.uk/pubs/gis/GIS_register.asp) (there is also a link from the Magic website ) .

The post 1988 ALC data layer (which shows a subdivision of Grade 3) can also be made available, by contacting [Naturalenglandgidatamanagers@naturalengland.org.uk](mailto:Naturalenglandgidatamanagers@naturalengland.org.uk) .

Both these data sets are also available to download from <http://www.geostore.com/environment-agency/> .

See also section relevant section in Additional comments/advice.

#### **Tier 1 Settlements**

Site 119a Land adjoining Saredon Road

Site 136 Land at Landywood Lane

Site 704 Land off Norton Lane

- Hydrologically connection to Stowe Pool and Walk Mill Clay Pit SSSI

Site 136 Land at Landywood Lane

- Likely hydrologically connection to Stowe Pool and Walk Mill Clay Pit SSSI due to proximity of water course.

#### Site 154a Walsall Road

- This site is a brownfield site. Brownfield sites can have a high biodiversity value. Has the biodiversity value of the site been assessed?

[National Planning Policy Framework](#) paragraph 120b):

*120. Planning policies and decisions should:*

*b) recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production;*

#### Tier 2 Settlements

##### Site 591 Land at Oaklands Farm (north of Limepit Lane)

- Site adjacent to Cannock Chase AONB and could have significant impacts. We advise referring to [Cannock Chase AONB views and setting guide](#) and consultation with the AONB Partnership.

##### Site 016 Land at Pear Tree Farm

- Within close proximity to Cannock Chase AONB and could have significant impacts.. We advise referring to [Cannock Chase AONB views and setting guide](#) and consultation with the AONB Partnership.

Wombourne sites all (416, 285, 562/415, 459, 463, 284, 286) are in close proximity to the two Local Nature Reserves, South Staffordshire Railway Walk and Wom Brook Walk, which cross Wombourne

#### Tier 3 Settlements

**Wheaton Aston site allocations:** Site 379 Land off Ivetsey Road, Site 426a Bridge Farm: 54 Long Street and Site 610 Land off Marston Road/ Fenton House Lane

These site allocations are in close proximity to [Mottey Meadows SAC](#), [Mottey Meadows SSSI](#) and Mottey Meadows National Nature Reserve. Mottey Meadows is one of the best examples in the UK of wildflower rich floodplain meadows. The site is made up of a series of alluvial flood meadows which have been managed as hay meadows for many centuries.

We have a number of concerns about the site allocations which we note that water quality and recreational impacts have been identified in the Habitats Regulation Assessment (HRA):

- [Water quality impacts.](#) Water pollution from surface water drainage and foul drainage (including combined sewer overflow if applicable), especially Site 610 Land off Marston Road/ Fenton House Lane.
- [Air quality impacts.](#) We note that Marston Road borders the top half of the SAC and traffic increases on this road could have an impact. We note that for ammonia the site is in exceedance and for nitrogen deposition the site is currently exceeding and close to exceeding the upper threshold (Source: [APIS](#)) .
- [Recreation impacts.](#) The proposed site allocations are likely to increase recreational pressure on the site. Alternative green and open space will need to be included as part of any mitigation measures.

Please note that the SAC has a maintain and restore objective for water quality and quality, air quality.

#### Other Sites Adjacent Neighbouring Towns and Cities

##### 036c Land at Weeping Cross (adjoining Stafford Borough)

- Potential significant impacts on Cannock Chase AONB due to location and size. We advise referring to [Cannock Chase AONB views and setting guide](#) and consultation with the AONB Partnership.

**Question 9:**

**A) Do you support the proposed pitch allocations in Policy SA6? Yes/No**

**Please reference the site reference number (e.g GT01) for the site you are commenting on in your response.**

We provide the following advice on the proposed allocations:

- Any sites within 15km of Cannock Chase SAC and will have potential recreational impacts on Cannock Chase SAC.
- They are also potential air quality impacts on designated sites from the proposed allocations. A traffic assessment will be required to understand what the potential impacts of the allocations will be.

Site GT32 Pool House Road, Wombourne

- Hydrologically connection to Stowe Pool and Walk Mill Clay Pit SSSI

Site GT35 122 Streets Lane, Great Wyrley

- Likely hydrologically connection to Stowe Pool and Walk Mill Clay Pit SSSI due to proximity of water course.

**B) Is there another option for meeting our gypsy and traveller needs, including any alternative site suggestions that could be considered? Yes/No**

**Please provide details, including a plan for new site suggestions**

We have no comments to make.

**Question 10:**

**Do you support the proposed allocation in Policy SA7? Yes/No**

- They are potential air quality impacts on designated sites from the proposed allocation.
- In close proximity to Four Ashes Pit SSSI and could have significant impacts.
- Loss of priority habitat- deciduous woodland.

**Question 11:**

**Do you agree with the proposed policy approaches set out in Chapter 6? Yes/No**

**If no, then please provide details setting out what changes are needed, referencing the Policy Reference number (e.g HC1 - Housing Mix).**

We provide the following advice on the proposed policy approaches:

HC13 - Health and Wellbeing

There is evidence to demonstrate the positive impact that the natural environment can have on health (see links below) and we would advise making reference to this in this policy. See links below for further information. Natural England is one of the partners involved in a project to test how to increase use and connectivity to [green social prescribing](#) in England to improve people's mental health.

[Improving health in cities using green infrastructure- a review](#)

[Links between natural environments and obesity](#)

[Links between natural environments and physical activity](#)

[Links between natural environments and physiological health](#)  
[Links between natural environments and mental health](#)  
[Good practice in social prescribing for mental health: the role of nature-based interventions \(NECR228\)](#)  
[Cities, green infrastructure and health](#)  
[NECR211 – Is it nice outside? – Consulting people living with dementia and their carers about engaging with the natural environment](#)  
[Connection to Nature](#)  
[POSTNOTE- Green space and health](#)

#### HC17 - Open Space

We welcome this policy direction, specifically the links to the green infrastructure. There is an opportunity to enhance and create green and blue infrastructure throughout the South Staffordshire area and to link in with geology and heritage assets, while providing climate change adaption and mitigation and improving ecological connectivity. When considering opportunities we would advise thinking about whether any existing designated sites or local wildlife sites are being affected by for example recreational impacts or water quality impacts and whether they are opportunities to mitigate these impacts through the creation and enhancement of green and blue infrastructure and open spaces. You may also wish to consider as part of your strategy the implications of the Covid pandemic and how the need for access to nature nearby has increased.

Natural England developed the [Accessible Natural Greenspace Standard \(ANGST\)](#) , which recommends that everyone, wherever they live, should have accessible natural greenspace of at least two hectares in size, no more than 300 metres (five minutes' walk) from home. Natural England is working with Defra to revise these standards and develop Green Infrastructure Standards that will feed into this piece of evidence. The following document is part of this development and you may find it useful: [A rapid scoping review of health and wellbeing evidence for the Framework of Green Infrastructure Standards](#).

#### HC19 - Wider green infrastructure design principles

We support the inclusion of this policy. The development plan should set out a clear strategy for how green infrastructure will be delivered. This could include green infrastructure targets, standards, requirements for development and opportunity areas. The strategy may be based on current green infrastructure strategies, upcoming green infrastructure strategies, other natural environment strategies or biodiversity opportunity/ecological network mapping. The plan should identify deficiencies in green infrastructure provision and opportunities for new green infrastructure. The green infrastructure policy should support and align with other natural environment and active travel policies (e.g., biodiversity net gain investment can support wider green infrastructure outcomes). We refer you to [Planning Policy Guidance -Green Infrastructure](#).

We are currently working on the green infrastructure standards. If you would like further information, please contact us. We are also aware of [Building with Nature](#), which provides a benchmark for the design and maintenance of green infrastructure in housing and commercial development.

You may find the following links useful:

[Natural England's Green Infrastructure Guidance](#)  
[Green Infrastructure Strategies: an introduction for local authorities and their partners](#)  
[Econets, landscape & people: Integrating people's values and cultural ecosystem services into the design of ecological networks and other landscape change proposals \(NECR180\)](#)  
[Climate Change Adaptation Manual](#)  
[EEA Technical report No 12 2015- Exploring nature-based solutions. The role of green infrastructure in mitigating the impacts of weather- and climate change-related natural hazards](#)  
[NECR175 - Research on the assessment of risks & opportunities for species in England as a result of climate change](#)



In urban areas there will be opportunities to: retrofit Sustainable Urban Drainage (SUDS) which can help with water management, plant trees which can provide shading and cooling -an important climate change adaptation and design in green and blue infrastructure into redevelopment. For information on opportunities, please see below:

[Greening the Grey: a framework for integrated green grey infrastructure](#)

[Designing Blue Green Infrastructure \(BGI\) for water management, human health, and wellbeing: summary of evidence and principles for design](#)

[Introducing England's urban forests](#)

[Forest Research- Urban Tree Manual](#)

[The Trees and Design Action Group \(TDAG\) Guides](#)

We are aware of the following tools which may be of interest to you:

Exeter Uni- ORVal: Outdoor Recreation Valuation Tool <http://Leep.exeter.ac.uk/orval/>

University of Liverpool – Condatis: A decision support tool to identify the best locations for habitat creation and restoration to enhance existing habitat networks and increase connectivity across landscapes.. <http://wordpress.condatis.org.uk/>

#### EC1 - Sustainable economic growth

We welcome the inclusion of creation and enhancement of multifunctional green spaces and enhancement of the green infrastructure network.

#### EC8 – Wolverhampton Halfpenny Green Airport

The Habitats Regulation Assessment has noted that this policy could lead to growth at the site and potential likely significant effects in combination for air quality impacts.

#### EC11 -Sustainable transport

The Habitats Regulation Assessment has identified that air pollution, in particular from traffic, could impact International and European designated sites. Due to a lack of evidence impacts have not been assessed and cannot be ruled out. Once evidence is provided and an assessment is made, changes may be required as the approach to dealing with air quality impacts on European designated sites is progressed.

#### NB1 - Protecting, enhancing and expanding natural assets

We support the policy direction. We advise that you ensure that you include European designated sites (ie. Special Area of Conservation (SAC) and Special Protection Area (SPA)) and make reference to green and blue infrastructure.

We would advise including within the policy the hierarchy of designated sites in line with paragraph 175 of the [National Planning Policy Framework](#) and ensuring any references made to designated sites reflects this hierarchy.

#### NB2 - Biodiversity

We support this policy and advise the following:

The plan's approach to biodiversity net gain should be compliant with the mitigation hierarchy, as outlined in paragraph 175 of the [National Planning Policy Framework](#). The policy should ensure that biodiversity net gain is not applied to irreplaceable habitats and should also make clear that any mitigation and/or compensation requirements for European sites should be dealt with separately from

biodiversity net gain provision.

Policies and decisions should first consider options to avoid adverse impacts on biodiversity from occurring. When avoidance is not possible impacts should be mitigated and finally, if there is no alternative, compensation provided for any remaining impacts. Biodiversity net gain should be additional to any habitat creation required to mitigate or compensate for impacts. It is also important to note that net gains can be delivered even if there are no losses through development.

The policy for net gain, or its supporting text, should highlight how losses and gains will be measured. [The Biodiversity Metric 3.0](#) can be used for this purpose as a fully tested metric that will ensure consistency across the plan-area and we would encourage its use. Alternatively your authority may choose to develop a bespoke metric, provided this is evidenced based.

The following may also be useful considerations in developing plan policies:

- Use of a map within the plan. Mapping biodiversity assets and opportunity areas ensures compliance with national planning policy and also helps to clearly demonstrate the relationship between development sites and opportunities for biodiversity net gain.
- Use of a biodiversity net gain target. Any target should be achievable and evidence based and may be best placed in lower tier documents or a Supplementary Planning Document, to allow for regular updates in line with policy and legislation.
- Consideration should be given to thresholds for different development types, locations or scales of development proposals and the justification for this. Setting out the scope and scale of expected biodiversity net gains within Infrastructure Delivery Plans can help net gain to be factored into viability appraisals and land values. Natural England considers that all development, even small scale proposals, can make a contribution to biodiversity. Your authority may wish to refer to Technical Note 2 of the [CIEEM guide](#) which provide useful advice on how to incorporate biodiversity net gain into small scale developments.
- Policy should set out how biodiversity net gain will be delivered and managed and the priorities for habitat creation or enhancement in different parts of the plan area. The plan policy should set out the approach to onsite and offsite delivery. Natural England advises that on-site provision should be preferred as it helps to provide gains close to where a loss may have taken place. Off-site contributions may, however, be required due to limitations on-site or where this best meets wider biodiversity objectives set in the development plan. Further detail could be set out in a supplementary planning document.
- The policy could also usefully link to any complementary strategies or objectives in the plan, such as green infrastructure.

### *Monitoring*

Your plan should include requirements to monitor biodiversity net gain. This should include indicators to demonstrate the amount and type of gain provided through development. The indicators should be as specific as possible to help build an evidence base to take forward for future reviews of the plan, for example the total number and type of biodiversity units created, the number of developments achieving biodiversity net gains and a record of on-site and off-site contributions.

Local Planning Authorities should work with local partners, including the Local Environmental Record Centre and wildlife trusts, to share data and consider requirements for long term habitat monitoring. Monitoring requirements should be clear on what is expected from landowners who may be delivering biodiversity net gains on behalf of developers. This will be particularly important for strategic housing allocations and providing as much up front information on monitoring will help to streamline the project stage.

### NB3 - Cannock Chase SAC

We support the policy direction but advise that as noted in the Habitats Regulation Assessment, any mitigation must be fully secured.

In terms of including a policy hook additionally for air quality for Cannock Chase SAC and other International and European sites, we would suggest that you may wish to have this as a separate policy.

### NB4 - Landscape Character

We would advise that reference should be made to Cannock Chase Area of Outstanding Natural Beauty (AONB), which is within the South Staffordshire local plan area, and to conserving and enhancing of its character. We suggest that you also make reference to the [Cannock Chase AONB Design Guide](#) and the [Cannock Chase AONB Management Plan](#).

Natural England would like to see the policy requiring new developments to minimise and mitigate the visual impacts that it has on the Character Areas and quality of its landscape setting. We would like to see visual impacts include light pollution and for noise pollution also to be included. Local Landscape Character Assessments will be essential here alongside the National Character Area Assessments as a source of evidence. (See Annex A)

Light pollution has negative impacts on local amenity, intrinsically dark landscapes and nature conservation (especially bats and invertebrates). Light pollution mapping is available from [CPRE](#).

The Local Plan should identify relevant areas of tranquillity and provide appropriate policy protection to such areas as identified in paragraph 102 and 185 of the [National Planning Policy Framework](#). Tranquillity is an important landscape attribute in certain areas. The CPRE have mapped areas of tranquillity which are available [here](#) and are a helpful source of evidence for the Local Plan and SEA/SA.

### NB5 - Renewable and low carbon energy generation and NB6 - Energy and water efficiency, energy and heat hierarchies and renewable energy in new development

We support the direction but advise that the Local Plan should consider climate change adaption and mitigation, as well as recognising the role of the natural environment to deliver measures to reduce the effects of climate change, for example tree planting to moderate heat island effects. In addition factors which may lead to exacerbate climate change (through more greenhouse gases- not just carbon) should be avoided (e.g. pollution, habitat fragmentation, loss of biodiversity) and the natural environment's resilience to change should be protected. Green Infrastructure and resilient ecological networks play an important role in aiding climate change adaptation. 'Nature-based solutions', are essential to achieve this. These involve the restoration of ecosystems for the long-term benefit of people and nature. Examples include:

- Expansion of tree and woodland cover - to strengthen woodland habitat networks, protect soils, provide shade whilst capturing additional carbon from the atmosphere.
- Restoration and creation of [priority habitats](#) such as lowland heathland, lowland meadows, lowland fens and rush pastures. This improves places where people live and recreate, protecting carbon stores and strengthening the nature recovery network.
- Natural floodplain management, through the use of tree planting, habitat creation and restoration, to alleviate flooding further downstream.
- Retrofitting of green and blue infrastructure such as trees and sustainable urban drainage systems (SUDS) in urban localities to address flood risk and heat island effects.

Within your Plan we suggest you consider including the following actions:

1. Set an ambitious climate-specific policy with targets for reducing greenhouse gas emissions. Plans should include a clear commitment to achieving the national statutory target of net zero

- emissions by 2050, with policies to secure significant reductions in greenhouse gas emissions over the Plan period;
2. Identify, protect and plan to restore all areas of peatland. Our mapping system shows that there are areas of peat in the Plan area south of Stafford, south of Penkridge/west of Cannock, near Trescott and near Beekbury. Ideally any plan to restore peatland, should wherever possible include management of the catchment areas that support the peatland. We would advise extending this approach to shallow peaty areas in addition to deep peats.
  3. Identify opportunities to increase tree and woodland cover consistent with the UK target. Wherever possible, this should provide multi-functional benefits. Planting on peatlands and other open habitats must be avoided.
  4. Identify areas where nature-based solutions can provide benefits to people whilst reducing climate change vulnerability in the natural environment.
  5. Identify habitats and protected sites that are particularly vulnerable to the impacts of climate change and consider how the planning system can work to reduce these vulnerabilities.

We advise that these actions are integrated into a strategic approach alongside green infrastructure, health and wellbeing, biodiversity net gain, natural flood management, air and water quality to deliver multifunctional benefits to people and wildlife. The Plan should make clear that development will be consistent with these policies, to ensure sustainable development is properly achieved across the Plan period. Meaningful targets should be set that can be appropriately monitored over the Plan period to demonstrate the effectiveness of the Plan/Policy in addressing climate change and to ensure appropriate remedial action can be taken as necessary.

Further information on climate change resources can be found in Annex 2. Natural England would be happy to advise further on this aspect of the Local Plan development.

#### NB7 - Managing flood risk, sustainable drainage systems & water quality

Natural England expects the Plan to consider the strategic impacts on water quality and resources as outlined in paragraph 170 of the NPPF. We would also expect the plan to address flood risk management in line with the paragraphs 155-165 of the NPPF.

The Local Plan should be based on an up to date evidence base on the water environment and as such the relevant River Basin Management Plans should inform the development proposed in the Local Plan. These Plans (available [here](#)) implement the EU Water Framework Directive and outline the main issues for the water environment and the actions needed to tackle them. Local Planning Authorities must in exercising their functions, have regard to these plans.

The Local Plan should contain policies which protect habitats from water related impacts and where appropriate seek enhancement. Priority for enhancements should be focussed on European sites, SSSIs and local sites which contribute to a wider ecological network.

Plans should positively contribute to reducing flood risk by working with natural processes and where possible use Green Infrastructure policies and the provision of SUDs to achieve this.

#### NB10 - Canal network

We support the measures to integrate the canal network into the wider green infrastructure network.

#### **Question 12:**

**a) It is proposed that the fully drafted policies in this document (Policies DS1-DS4 and SA1-SA7) are all strategic policies required by paragraph 21 of the NPPF. Do you agree these are strategic policies? Yes/No**

**b) Are there any other proposed policies in Chapter 6 that you consider should be identified as strategic policies? Yes/No**

**If yes, then please provide details including the Policy Reference (e.g HC1 – Housing Mix)**

We do not have any comments to make on this at this time.

**Additional comments/advice**

Strategic and cross boundary issues -Air quality

There will need to be an assessment of 'in combination' effects from air quality on designated sites. This will need to involve neighbouring Local Planning Authorities in respect of plans and projects which in combination may have significant effects on European Sites in the area.

Soil and Best and Most Versatile agricultural land.

Currently policies and supporting text are not adequately in line with paragraph 174 a) and b) of the [National Planning Policy Framework](#) or the government's [25 Year Environment Plan](#).

The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpin our well being and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver, for example:

- Safeguard the long term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future.
- To avoid development that would disturb or damage other soils of high environmental value (e.g. wetland and other specific soils contributing to ecological connectivity, carbon stores such as peatlands etc) and, where development is proposed.
- Ensure soil resources are conserved and managed in a sustainable way.
- The plan should also recognise the important role soil plays in carbon storage- see [Carbon Storage and Sequestration by Habitat](#) for further information.

The plan should include a clear and correct definition of best and most versatile (BMV) agricultural land and high quality agricultural land. (see page 22 of plan- best and most versatile agricultural land is identified incorrectly as only grades 1 and 2.) The Council may find it helpful to look at [Natural England's Technical Information Note 049 on Agricultural Land Classification \(ALC\)](#) which describes the ALC system including the definition of BMV land, existing ALC data sources and their relevance for site level assessment of land quality and the appropriate methodology for when detailed surveys are required.

We would advise that the plan refers to sources of ALC and BMV mapping and data which will include but not limited to: the [www.magic.gov.uk](http://www.magic.gov.uk) website and Natural England. For example [Agricultural Land Classification map West Midlands Region \(ALC004\)](#) and [Likelihood of Best and Most Versatile \(BMV\) Agricultural Land - Strategic scale map West Midlands Region \(ALC016\)](#).

To support plan allocations (and subsequent planning applications) relevant polities should refer to the [Defra Code of practice for the sustainable use of soils on construction sites](#) and sites (over 5ha agricultural land) should have a site-specific Soils Management Plan informed by a detailed Agricultural Land Classification (ALC) and soil resource survey, in line with best practice guidance.

Access and Rights of Way

Natural England advises that the Plan should include policies to ensure protection and enhancement of public rights of way and National Trails, as outlined in paragraph 100 of the [National Planning Policy Framework](#). Recognition should be given to the value of rights of way and access to the natural environment in relation to health and wellbeing and links to the wider green infrastructure network. The plan should seek to link existing rights of way where possible, and provides for new access opportunities.

The plan should avoid building on open space of public value as outlined in paragraph 99 of the [National Planning Policy Framework](#).

The plan should make provision for appropriate quantity and quality of green space to meet identified local needs as outlined in paragraph 98 of the NPPF. Natural England's work on [Accessible Natural Greenspace Standard \(ANGSt\)](#) may be of use in assessing current level of accessible natural greenspace and planning improved provision.

### **Habitats Regulation Assessment (HRA)**

We welcome the HRA and note that the assessment has concluded that further information is required.

We wish to provide the following advice:

#### **Air pollution**

- Motte Meadows SAC is adjacent to Marston Road. The SAC is in exceedance for ammonia and for nitrogen deposition the site is currently exceeding the lower threshold and is close to exceeding the upper threshold (Source: [APIS](#)).

Midland Mere & Mosses Phase 2 (Aqualate Mere SSSI) is adjacent or within 200m of several roads including Guild Lane and Walkley Bank. The site is in exceedance for ammonia and significantly exceeding for nitrogen deposition (Source: [APIS](#)).

Why have air quality impacts not been identified as a risk for the above sites? What is the justification for excluding this site? Do you have evidence? I.e. a traffic assessment/modelling?

- We advise you to refer to [Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations](#).

### **Sustainability Appraisal Report**

Having reviewed the above report we have a couple of queries:

- Having seen Table 6.1 assessment for Wheaton Aston, we would like to understand further how site 610 for example was selected when site 614 scored better.
- We note that the report has not been able to undertake a comprehensive assessment of impacts on best and most versatile land classed as grade 1,2,3a in the agricultural land classification due to a lack of site specific ALC studies. How is the Council justifying allocating on BMV land?

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Gillian Driver on 0208 02 60995. For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely

*Gillian Driver*

Ms Gillian Driver  
Lead Adviser  
Land use planning – West Midlands Area Team



## **Annex A**

### **Sources of local plan evidence on the natural environment**

The following sources of evidence may be useful in ensuring local plans are evidence based, in line with paragraph 31 of the National Planning Policy Framework (NPPF) and assist in meeting Strategic Environmental Assessment (SEA) requirements. A range of additional locally specific evidence is also likely to be needed to underpin plan preparation.

#### **General natural environmental evidence**

[National Character Areas](#) (NCAs) divide England into 159 distinct natural areas. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan.

Natural England has also published downloadable [natural capital maps](#). These are a suite of ten maps, of different aspects of natural capital, contributes to our understanding of where our natural capital is.

The [Magic](#) website will provide you with much of the **nationally held natural environment data** for your plan area in downloadable GIS format. Specific data sets are listed under the environmental topics below.

[Local environmental record centres](#) may hold a range of additional information on the natural environment, principally ecological.

The following local organizations may also hold environmental information where applicable: Local Nature Partnerships, Wildlife trusts, Areas of Outstanding Natural Beauty, and [Nature Improvement Areas](#).

Evidence relating to the **significant environmental effects of the current local plan** should be available (in line with SEA legislation), as should suitable biodiversity evidence for any plan adopted after the NPPF came into effect (27 March 2012), usually through the current plan's Annual Monitoring Report.

#### **Landscape**

The [Magic](#) website provides data on the extent of protected landscapes (**National Parks and Areas of Outstanding Natural Beauty**).

**National Park/Area of Outstanding Natural Beauty Management Plans** may also be a source of useful evidence. These are usually found on these organisations websites.

Most areas have local **landscape character assessments**. These are tools to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area.

Data on **tranquillity** is held by [CPRE](#). They also hold mapping data on [light pollution](#).

#### **Biodiversity and geodiversity**

The most relevant layers on [Magic](#) for you to consider are **Ancient Woodland, Local Nature Reserves, Priority Habitat Inventory, Sites of Special Scientific Interest** (including their **impact risk zones**), **Special Areas of Conservation, Special Protection Areas, and Ramsar Sites** (including, where relevant, marine designations).

You may also wish to draw on more detailed information on specific [Sites of Special Scientific Interest](#) and the [Conservation Objectives](#) and [Site Improvement Plans](#) for **Special Areas of Conservation** and **Special Protection Areas**.

[Priority habitats and species](#) are those listed under Section 41 of the Natural Environment and Rural Communities Act, 2006 and UK Biodiversity Action Plan (UK BAP). Larger areas of priority habitat will usually be mapped either as **Sites of Special Scientific Interest** on the Magic website or as **Local Wildlife Sites or Local Geological Sites**. **Local wildlife site** data is usually held by local planning authorities themselves as is **local geological site** data. Local Environmental Record Centres and local wildlife and geoconservation groups are also a source of information on Local Sites.

Natural England maintains the **Open Mosaic Habitat on Previously Developed Land Inventory** (a priority habitat dataset currently not integrated into the Priority Habitat Inventory on [Magic](#)) and is available on request from Natural England via email; [NaturalEnglandGIDataManagers@naturalengland.org.uk](mailto:NaturalEnglandGIDataManagers@naturalengland.org.uk).

**Local Biodiversity Action Plans** (LBAPs) identify the local action needed to deliver UK targets for habitats and species. They also identify targets for other habitats and species of local importance and can provide a useful blueprint for biodiversity enhancement in any particular area. Local Geodiversity Action Plans (LGAPs) identify agreed local action for geodiversity, a list of active LGAPs can be found at [UK Geodiversity Action Plan](#).

Some areas have identified **Biodiversity Opportunity Areas** or similar for spatially targeting biodiversity restoration work.

**Protected species** are those species protected under domestic or European law. [Local environmental record centres](#) are likely to hold much of the available data on such species.

### **Air Quality**

[APIS](#) holds data on air pollution in particular in relation to protected nature conservation sites.

### **Access**

The [Magic](#) website holds the following access related data: **National Trails, Public Rights of Way (on the Ordnance Survey base map), Open Access Land (the Countryside and Rights of Way Act 2000 layer), together with national and local nature reserves, country parks** and the [England Coast Path](#).

Locally held data will include the **definitive Public Rights of Way**, and may include **Rights of Way Improvement Plans** where they exist, and any locally mapped **open space audits or assessments**.

Natural England's work on [Accessible Natural Greenspace Standards \(ANGSt\)](#) may be of use in assessing current level of accessible natural greenspace and planning improved provision.

### **Green infrastructure**

Green infrastructure strategies may comprise or contain useful evidence sources where they exist.

The [England Green Infrastructure Mapping Database \(NERR105\)](#) is designed to provide technical evidence on the Green Infrastructure of England as an open data product under Open Government License (OGL) conditions.



## **Soils**

A provisional Agricultural Land Classification (ALC) map is on [Magic](#), and the GIS layer 'Likelihood of Best and Most Versatile Land' is available on request from Natural England via email; [NaturalEnglandGIDataManagers@naturalengland.org.uk](mailto:NaturalEnglandGIDataManagers@naturalengland.org.uk).

Some areas already have detailed ALC maps. The coverage of existing detailed MAFF post 1988 ALC surveys is shown on [Magic](#). The MAFF post 1988 ALC survey reports and maps themselves are available from [Natural England](#) or from [Gov.UK](#).

Our publication [Agricultural Land Classification: protecting the best and most versatile agricultural land](#) may also be of help.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](#) website and also from the [LandIS](#) website, which contains more information about obtaining soil data.

## **Climate change**

The [Climate Change Adaptation Manual](#) provides evidence to support nature conservation in a changing climate.

Landscape scale climate change assessment method (found in the Adaptation Manual) which is based on the [NCA method](#).

Natural England's [Nature Networks Evidence Handbook](#) identifies the principles of nature network design and describes the evidence that underpins the desirable features of nature networks.

The [Carbon Storage and Sequestration by Habitat](#) report provides evidence and support for nature-based solutions for net zero.

The [National Biodiversity Climate Change Vulnerability Assessment Model](#) provides a spatially explicit assessment of the relative vulnerability of priority habitats. The data files can be accessed here: [National Biodiversity Climate Change Vulnerability Assessment data](#).

The [LWEC Climate Change Impacts Report Cards](#) present the latest evidence on how climate change is affecting different aspects of our environment, economy and society

## **Water Quality and Resources and Flood Risk Management**

The Planning Practice Guidance provides guidance on [information sources for the water environment](#).

## **Annex 2**

### **Climate change – further resources**

Natural England has published a range of resources to help with the recommended actions. Please see below links to further resources that may be useful in developing local policy to address climate change within the local authority area.

- The [Climate Change Adaptation Manual](#) - provides extensive information on climate change adaptation for the natural environment. It considers the potential impacts of climate change on individual priority habitats and outlines possible adaptation responses. It includes the Landscape Scale Adaptation Assessment Method to assist those wanting to undertake a climate change vulnerability assessment for an area larger than an individual site or specific environmental feature, focussing on identifying vulnerabilities to climate change.

- The [National Biodiversity Climate Change Vulnerability Model](#) is a mapping tool that helps identify areas likely to be more vulnerable to the impacts of climate change.
- [Carbon Storage and Sequestration by Habitat 2021 \(NERR094\)](#) – a recently updated report that reviews and summarises the carbon storage and sequestration rates of different semi-natural habitats that can inform the design of nature-based solutions to achieve climate mitigation and adaptation.
- The [Nature Networks Evidence Handbook](#) – aims to help the designers of nature networks by identifying the principles of network design and describing the evidence that underpins the desirable features of nature networks. It builds on the Making Space for Nature report of Lawton et al. 2010), outlining some of the practical aspects of implementing a nature network plan, as well as describing the tools that are available to help in decision making.
- [Natural England Climate Change webinars](#) - a range of introductory climate change webinars available on YouTube.

In addition the following sources may prove useful:

[Net Zero- The UK's contribution to stopping global warming](#)

[Cities on the route to 2030 -Building a zero emissions, resilient planet for all](#)



Date: 22 December 2022  
Our ref: 412446  
Your ref: South Staffordshire Local Plan Review Regulation 19 Consultation



Strategic Planning Team  
South Staffordshire Council

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**BY EMAIL ONLY- [localplans@sstaffs.gov.uk](mailto:localplans@sstaffs.gov.uk)**

Dear Sir/Madam

**Subject: South Staffordshire Local Plan Review Regulation 19 Consultation**

Thank you for your consultation dated and received by Natural England on 11 November 2022.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

**South Staffordshire Council Publication Plan (Regulation 19) November 2022**

We are generally supportive of the plan, however, there are some issues that we feel need to be addressed. We have listed these within our submission. Natural England has adopted a robust precautionary approach within this plan response.

We recognise that this consultation focuses itself upon the need to preliminarily test the potential for soundness. With this in mind, it is Natural England's advice that the plan in its current guise is not sound or legally compliant for the reasons we have outlined immediately below.

In helping to make this plan sound and legally compliant, Natural England would be very happy to discuss these issues further, with a view to agreeing modifications.

**Question 4 (1). Do you consider the Local Plan is legally compliant?**

No. The Habitats Regulation Assessment has been unable to rule out impacts on Habitats Sites due to a lack of evidence.

**Question 4 (2). Do you consider the Local Plan is sound?**

No - Further evidence needs to be collected and the Habitats Regulation Assessment should assess potential air quality impacts.

**Question 4 (3). Do you consider the Local Plan complies with the duty to co-operate?**

In terms of Cannock Chase Special Area of Conservation and recreational impacts, the Local Plan does comply with the Duty to Co-operate.

Natural England has and continues to discuss air quality impacts on protected sites with the Cannock Chase Partnership which South Staffordshire Council is a member of. Natural England will continue dialogue with the Partnership including South Staffordshire Council and proposes to record progress on the air quality issues through a statement of common ground with the Council.

**5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.**

We agree with the conclusion of the Habitats Regulation Assessment that for those European sites in the area of search with features sensitive to air pollution, adverse effects on their integrity, alone or in combination, cannot be ruled out due to a lack of evidence.

**6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

***Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

***After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.***

We advise the following issues listed below need to be addressed:

**Table 4: Economic Prosperity – issues and challenges (page 19)**

In this paragraph it is stated that “The best and most versatile agricultural land is classified as grades 1 and 2.” This is not entirely correct and should be amended to the correct definition- i.e.:

The best and most versatile agricultural land is classified as grades 1, 2 and 3a.

**Sustainable transport (pages 142- 144 including Policy EC12)**

The HRA has identified that air pollution, in particular from traffic, could impact International and European designated sites. Due to a lack of evidence impacts have not been assessed and cannot be ruled out. Once evidence is provided and an assessment is made, changes may be required as the approach to dealing with air quality impacts on European designated sites is progressed.

**12. Protecting and enhancing the natural environment -Protecting, enhancing and expanding natural assets**

12.1 (page 147) This paragraph sets out the natural assets of the area but has missed out Motte Meadows Special Area of Conservation and we advise that the site should be added to the text to ensure that all assets are acknowledged.

**Policy NB3: Cannock Chase SAC (page 152)**

The first paragraph must be reworded as currently it will allow significant impacts on the SAC, we advise you reword it to the following:

Development will only be permitted where it can be demonstrated that proposal will have no adverse effect upon the integrity of the Cannock Chase Special Area of Conservation (SAC) either alone or in combination with other plans or projects.

**7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?**

No, we do not consider it necessary to participate at the oral part of the examination.

**8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:**

N/A.

For any queries relating to the specific advice in this letter only please contact Gillian Driver on 07771 844 523. For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk) .

Yours sincerely

*Phil Burton*

Mr Phil Burton  
Senior Adviser  
West Midlands Area Team – Planning and Connecting People with Nature



Date: 29 May 2024  
Our ref: 473290  
Your ref: South Staffordshire Local Plan Review Regulation 19 Consultation



Strategic Planning Team  
South Staffordshire Council

**BY EMAIL ONLY**

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Dear Strategic Planning Team,

**Planning consultation: South Staffordshire Local Plan Review Regulation 19 Publication Version Consultation**

Thank you for your consultation on the above dated 18 April 2024 which was received by Natural England on 18 April 2024. Officers from our organisations have discussed the content of our response below and you are aware of our views.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

**South Staffordshire Council Publication Version (Regulation 19)**

Natural England welcomes the opportunity to comment at this stage of the South Staffordshire Local Plan Review and particularly supports the inclusion of policies on green infrastructure, biodiversity net gain and supporting a greener future.

When considering the opportunities for nature recovery within the Staffordshire nature recovery network mapping work alongside the emerging Local Nature Recovery Strategy (LNRS); we would like to draw your attention to a Natural England led partnership project called Midlands Heathland Heartlands (MHH). The MHH partnership has a nature recovery aspiration for this area that aims to utilise Lawton Principles in recreating a mosaic of diverse habitats that will enable a long-term link-up between Cannock Chase and Sutton Park. MHH has a particular interest in re-establishing a network of heathland habitat in areas with substrates that can host Heathland. A cross-boundary partnership has come together to utilise the Biodiversity Net Gain opportunities offered through a developing LNRS in making this happen. The NE Midlands Heathland Heartland specialist team would very much welcome the opportunity to have more dialogue with the South Staffordshire Council on this matter.

We have reviewed the consultation documents and provide comments that relate to the soundness of the Local Plan and that are most relevant to our interest in the Natural Environment. Please also note that our advice within our previous response at Regulation 19 to you (22nd December 2022; Ref. 412446) still stands and should be reviewed alongside this follow-up Regulation 19 response.

Natural England has adopted a robust precautionary approach within this plan response and whilst we welcome the content of the Local Plan Review, Natural England advises that the Plan in its current form, is **not sound or legally compliant due to the impacts of Air Quality in relation to internationally designated nature conservation sites**.



**Question 4 (1). Do you consider the Local Plan is legally compliant?**

No. The Habitats Regulation Assessment has been unable to rule out impacts on Habitats Sites due to a lack of evidence regarding air quality.

**Question 4 (2). Do you consider the Local Plan is sound?**

No - Further evidence needs to be collected and the Habitats Regulation Assessment should then assess potential air quality impacts on any European Sites.

**Question 4 (3). Do you consider the Local Plan complies with the duty to co-operate?**

In terms of Cannock Chase Special Area of Conservation and recreational impacts, the Local Plan does comply with the Duty to Co-operate.

In terms of air quality, Natural England is currently in ongoing advisory discussions with South Staffordshire and their extra-local partner authorities in the mitigating of air quality impacts on protected sites linked to the Cannock Chase Partnership, of which South Staffordshire Council is a member. Natural England is continuing this Air Quality dialogue with this partnership. While the evidence base is still to emerge from the work commissioned by the partnership's appointed consultants, NE has during its earlier Reg. 19 response (22nd December 2022; Ref. 412446) proposed that a Statement of Common Ground is drawn up as an interim measure alongside this plan.

**Question 5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.**

The Local Plan's Habitat Regulations Assessment (HRA) concludes that there is no Annual Average Daily Traffic (AADT) modelling data and therefore, taking a precautionary approach, there is a need for a detailed evidence base to be completed. As per 4.(3) above, we are aware of progress towards addressing the need for evidence base which is currently ongoing.

We agree with the conclusion of the Habitats Regulation Assessment that for those European sites in the area of search with features sensitive to air pollution, adverse effects on their integrity, alone or in-combination, cannot be ruled out due to this lack of evidence.

It is noted that the evidence is due to be completed and an update provided by the end of May 2024, as stated below.

*"In August 2023 the partnership authorities appointed consultants Sweco to progress this work, with the first stage the modelling of likely traffic growth, including the in-combination assessment across the study area. This traffic modelling is currently being finalised and will then be passed to the air quality team at Sweco to model the air pollution. It is envisaged that the outputs from this air quality modelling will be available by the end of May 2024, and will inform a further HRA work and an update to this document, to accompany the submission of the Plan."*

Natural England look forward to seeing the updated evidence and being able to provide further, more detailed comments at that stage via a Statement of Common Ground.

**Question 6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

## **Sustainable transport (including Policy EC12)**

The HRA has identified that air pollution, in particular, from traffic, could impact International and European designated sites. Due to a lack of extant evidence to date, impacts upon these designations have been unable to be assessed appropriately, thus impacts cannot be ruled out. Once evidence is provided and an assessment is made, amendments are likely to be then required to reflect any new evidence informed approaches that deal with the air quality impacts upon these European designated sites is progressed. A statement of common ground between parties should reflect this.

For any queries regarding this letter, for new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely

A handwritten signature in black ink, appearing to read 'Emma Johnson', with a long horizontal flourish extending to the right.

Emma Johnson  
Midlands Deputy Director  
West Midlands Area Team



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**23/12/2022**

Dear Sir/Madam,

### **South Staffordshire Council – South Staffordshire Local Plan Review**

Thank you for the opportunity to comment on the above document. The following comments are submitted by NHS Property Services (NHSPS).

#### **Foreword**

NHSPS manages, maintains and improves NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable, modern healthcare and working environments. NHSPS has a clear mandate to provide a quality service to its tenants and minimise the cost of the NHS estate to those organisations using it. Any savings made are passed back to the NHS.

#### **Overview**

In April 2013, the Primary Care Trust and Strategic Health Authority estate transferred to NHSPS, Community Health Partnerships and NHS community health and hospital trusts. All organisations are looking to make more effective use of the health estate and support strategies to reconfigure healthcare services, improve the quality of care and ensure that the estate is managed sustainably and effectively.

NHSPS support NHS commissioners to deliver a local health and public estate that can be put to better use. This includes identifying opportunities to reconfigure the estate to meet commissioning needs, as well as opportunities for delivering new homes (and other appropriate land uses) on surplus sites.

The ability to continually review the healthcare estate, optimise land use, and deliver health services from modern facilities is crucial. The health estate must be allowed to develop, modernise or be protected in line with integrated NHS strategies. Planning policies should support this and be prepared in consultation with the NHS to ensure they help deliver estate transformation.

Our comments on the policies set out within the South Staffordshire Local Plan Review are as follows.

**Policy flexibility (enabling the NHS to be able to promptly evolve its estate)**

**Introduction**

Policy **EC9** seeks to protect existing community facilities including health. This is further reiterated in policy **H14**. NHSPS do not support these policies for the reasons outlined below.

**Context**

In order to enable the NHS to be able to promptly adapt its estate to changing healthcare requirements, it is essential that all planning policies enable flexibility within the NHS estate. On this basis, NHSPS would advise the Council that policies aimed at preventing the loss or change of use of community facilities and assets, where healthcare is included within this definition, can have a harmful impact on the NHS's ability to ensure the delivery of facilities and services for the community. Where such policies are overly restrictive, the disposal of surplus and unsuitable healthcare facilities for best value can be prevented or delayed, which in turn delays vital re-investment in the NHS estate.

The NPPF is clear in stating that Local Plans should adopt policies that “take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community” (Paragraph 93b).

It is important that policies consider that some public service providers, such as the NHS, routinely undertake strategic reviews of their estates. Reviews of the NHS estate are aimed at improving the provision of healthcare services by increasing efficiencies, including through the disposal of unneeded and unsuitable properties. This means that capital receipts from disposals, as well as revenue spending that is saved, can be used to improve facilities and services.

Where it can be demonstrated that health facilities will be changed as part of a wider NHS estate reorganisation programme it should be accepted that a facility is neither needed nor viable for its current use.

With this in mind, we are keen to encourage that flexibility be granted to the NHS via the wording of any planning policy. This will ensure that the NHS can promptly and efficiently respond to the healthcare requirements of residents through the evolution of its estate.

**Amended Wording**

Local Plans should align their policies to “take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;” (paragraph 93b). By considering that other appropriate forms of testing outside of marketing can be carried out to assess the suitability of premises there will be greater opportunity to facilitate/cooperate with NHS objectives to handle healthcare facilities strategically to provide the best services possible.

As such, the plan can be made sound through the inclusion of an additional supporting paragraph to Policy EC9 and H14.

The additional text should clarify that:

*Should a health site be declared surplus to requirements as part of a wider estate reorganisation programme to ensure the continued delivery of public services and related infrastructure, such as those being undertaken by the NHS then the loss or change of use of existing health facilities will be acceptable. Evidence of such a programme will be accepted as a clear demonstration that the facility under consideration is neither viable nor needed and that adequate facilities are or will be*

*made available to meet the ongoing needs of the local population. In such cases no marketing will be required.*

**Policy (developer contributions)**

Policy **H14** states that a financial contribution will be sought from development that will impact on health care facilities. NHSPS supports this part of the policy.

**Context**

The NHS, Council and other partners must work together to forecast the infrastructure and costs required to support the projected growth and development across the borough. A vital part of this is ensuring the NHS continues to receive a commensurate share of S106 and Community Infrastructure Levy (CIL) developer contributions to mitigate the impacts of growth and help deliver transformation plans.

Paragraph 34 of The NPPF is clear that ‘Plans should set out the contributions expected from development. This should include setting out... infrastructure (such as that needed for... health)’

The significant cumulative impacts of residential developments on healthcare requirements in the area should be recognised and, given their strategic importance, health facilities should be put on a level footing with affordable housing and public transport improvements when securing and allocating S106 and CIL funds, in order to enable the delivery of vital NHS projects. It is imperative that planning policies are positively prepared, in recognition of their statutory duty to help finance improved healthcare services and facilities through effective estate management.

We request that when setting planning obligation policies, the Council seek to address strategic as well as local priorities in planning obligations and engage the NHS in the process as early as possible.

NHSPS thanks you for the opportunity to comment on the South Staffordshire Local Plan Review and look forward to working with you to ensure that the needs of the health services are taken into consideration.

Yours faithfully,

Rebecca Marwood MRTPI

**Associate Town Planner  
NHS Property Services**



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29<sup>th</sup> May 2024

BY EMAIL ONLY

**RE: Consultation on South Staffordshire Publication Plan (Regulation 19)**

Thank you for the opportunity to comment on the above document. The following representations are submitted by NHS Property Services (NHSPS).

**NHS Property Services**

NHS Property Services (NHSPS) manages, maintains and improves NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable and modern healthcare environments. We partner with local NHS Integrated Care Boards (ICBs) and wider NHS organisations to help them plan and manage their estates to unlock greater value and ensure every patient can get the care they need in the right place and space for them. NHSPS is part of the NHS and is wholly owned by the Department of Health and Social Care (DHSC) – all surplus funds are reinvested directly into the NHS to tackle the biggest estates challenges including space utilisation, quality, and access with the core objective to enable excellent patient care.

**General Comments on Health Infrastructure to Support Housing Growth**

The delivery of new and improved healthcare infrastructure is significantly resource intensive. The NHS as a whole is facing significant constraints in terms of the funding needed to deliver healthcare services, and population growth from new housing development adds further pressure to the system. New development should make a proportionate contribution to funding the healthcare needs arising from new development. Health provision is an integral component of sustainable development – access to essential healthcare services promotes good health outcomes and supports the overall social and economic wellbeing of an area.

Residential developments often have very significant impacts in terms of the need for additional primary healthcare provision for future residents. Given health infrastructure's strategic importance to supporting housing growth and sustainable development, it should be considered at the forefront of priorities for infrastructure delivery. The ability to continually review the healthcare estate, optimise land use, and deliver health services from modern facilities is crucial. The health estate must be supported to develop, modernise, or be protected in line with integrated NHS strategies. Planning policies should enable the delivery of essential healthcare infrastructure and be prepared in consultation with the NHS to ensure they help deliver estate transformation.



## **Detailed Comments on Draft Local Plan Policies**

Our detailed comments set out below are focused on ensuring that the needs of the health service are embedded into the Local Plan in a way that supports sustainable growth. When developing any additional guidance to support implementation of Local Plan policies relevant to health, for example in relation to developer contributions or health impact assessments, we would request the Council engage the NHS in the process as early as possible.

### **Draft Policy HC3 Affordable Housing**

As part of preparing additional guidance to inform detailed delivery of this policy, we suggest the Council consider the need for affordable housing for NHS staff and those employed by other health and care providers in the local authority area. The sustainability of the NHS is largely dependent on the recruitment and retention of its workforce. Most NHS staff need to be anchored at a specific workplace or within a specific geography to carry out their role. When staff cannot afford to rent or purchase suitable accommodation within reasonable proximity to their workplace, this has an impact on the ability of the NHS to recruit and retain staff.

Housing affordability and availability can play a significant role in determining people's choices about where they work, and even the career paths they choose to follow. As the population grows in areas of new housing development, additional health services are required, meaning the NHS must grow its workforce to adequately serve population growth. Ensuring that NHS staff have access to suitable housing at an affordable price within reasonable commuting distance of the communities they serve is an important factor in supporting the delivery of high-quality local healthcare services. We recommend that the Council:

- Engage with local NHS partners such as the local Integrated Care Board (ICB), NHS Trusts and other relevant Integrated Care System (ICS) partners.
- Ensure that the local need for affordable housing for NHS staff is factored into housing needs assessments, and any other relevant evidence base studies that inform the local plan (for example employment or other economic policies).
- Consider site selection and site allocation policies in relation to any identified need for affordable housing for NHS staff, particularly where sites are near large healthcare employers.

### **Draft Policy HC10 Design Requirements**

Draft Policy HC10 sets out the Council's commitment to making sure that new developments obtain high standards of design to ensure places function to positively impact people's well-being. NHSPS supports the inclusion of policies which recognise the impact of well-designed places on well-being but would also recommend the recognition of the role of planning in delivering and addressing health outcomes. There is a well-established connection between planning and health, and the planning system has an important role in creating healthy communities. The planning system is critical not only to the provision of improved health services and infrastructure by enabling health providers to meet changing healthcare needs, but also to addressing the wider determinants of health.

Identifying and addressing the health requirements of existing and new development is a critical way of ensuring the delivery of healthy, safe, and inclusive communities. On this basis, we recommend the inclusion of the specific policy requirements of both health and wellbeing in the Local Plan and encourage the Council to engage with the NHS on this matter ahead of its adoption. Specific policy requirements to promote healthy developments should include:

- Proposals should consider local health outcomes, and where appropriate to the local context and/or size of the scheme include a Health Impact Assessment
- Design schemes should encourage active travel, including through providing safe and attractive walking and cycling routes, and ensuring developments are connected by these routes to local services, employment, leisure, and existing walking and cycling routes.
- Provide access to healthy foods, including through access to shops and food growing opportunities (allotments and/or providing sufficient garden space)
- Design schemes in a way that encourages social interaction, including through providing front gardens, and informal meeting spaces including street benches and neighbourhood squares and green spaces.
- Design schemes to be resilient and adaptable to climate change, including through SUDs, rainwater collection, and efficient design.
- Consider the impacts of pollution and microclimates, and design schemes to reduce any potential negative outcomes.
- Provide sufficient and high quality green and blue spaces within developments.

## Draft Policy HC14 Health Infrastructure and Policy EC9 Protecting community services and facilities

Draft Policy HC14 focuses on the provision of new healthcare infrastructure and redevelopment of existing healthcare infrastructure. NHSPS support the amended wording of draft Policy HC14 which specifically pertains to the loss of healthcare infrastructure and enables necessary NHS estate reorganisations to ensure continued delivery of public services and related infrastructure.

Draft Policy EC9 focuses on the broader provision and redevelopment of community facilities, of which health facilities also fall under. NHSPS supports the provision of sufficient, quality community facilities but in line with our previous response to the Submission (2022) consultation, we do not consider the proposed policy approach to be positively prepared or effective in its current form. Where healthcare facilities are included within the Local's Plan definition of community facilities, policies aimed at preventing the loss or change of use of community facilities and assets can potentially have a harmful impact on the NHS's ability to ensure the delivery of essential facilities and services for the community.

The NHS requires flexibility with regards to the use of its estate to deliver its core objective of enabling excellent patient care and support key healthcare strategies such as the NHS Long Term Plan. In particular, the disposal of sites and properties which are redundant or no longer suitable for healthcare for best value (open market value) is a critical component in helping to fund new or improved services within a local area. Requiring NHS disposal sites to explore the potential for alternative community uses and/or to retain a substantial proportion of community facility provision adds unjustified delay to vital reinvestment in facilities and services for the community.

All NHS land disposals must follow a rigorous process to ensure that levels of healthcare service provision in the locality of disposals are maintained or enhanced, and proceeds from land sales are re-invested in the provision of healthcare services locally and nationally. The decision about whether a property is surplus to NHS requirements is made by local health commissioners and NHS England. Sites can only be disposed of once the operational health requirement has ceased. This does not mean that the healthcare services are no longer needed in the area, rather it means that there are alternative provisions that are being invested in to modernise services. Where it can be demonstrated that health facilities are surplus to requirements or will be changed as part of wider

NHS estate reorganisation and service transformation programmes, it should be accepted that a facility is neither needed nor viable for its current use, and policies within the Local Plan should support the principle of alternative uses for NHS sites with no requirement for retention of a community facility use on the land. To ensure the Plan is positively prepared and effective, and to ensure Draft Policy EC9 is consistent with Policy HC14, NHSPS are seeking the following modification (*shown in italics*).

**Proposed Modification to Draft Policy EC9:**

“...Development proposals that would result in the loss of uses, buildings of land for community services and facilities will only be supported where ~~both of~~ the following criteria can be clearly demonstrated:

a) Appropriate alternative existing provision will remain of at least equivalent quality and accessibility to local residents served by the existing facility, particularly by active travel methods.

b) The use is no longer viable and is incapable of being made viable or adapted to retain a viable service or facility including as a community run enterprise. A marketing exercise for a minimum of 12 months at a realistic price will be required to demonstrate that the use or premises is unviable. This includes marketing the premises for an alternative community service and facility uses; *or*

*c) Where healthcare facilities are formally declared surplus to the operational requirements of the NHS or identified as surplus as part of a published estates strategy or transformation plan, the requirements listed under Parts a to b of the Policy will not apply.”*

## Draft Policy EC11 Infrastructure and Policy HC14 Health Infrastructure [Infrastructure Funding]

Draft Policy EC11 states that all new development will be required to provide for the necessary infrastructure requirements arising from the proposal, in line with other Local Plan policies. Specifically for health infrastructure, Draft Policy HC14 seeks contributions (financial or on-site provision) from proposals for major residential developments or specialist elderly accommodation. NHSPS welcome contributions being sought for health infrastructure but find that as drafted the policy does not sufficiently consider the likely level of healthcare infrastructure required to support all levels and sources of growth proposed by the plan.

As currently highlighted in Policy HC14, in areas of significant housing growth involving major proposals, appropriate funding must be consistently leveraged through developer contributions for health and care services to mitigate the direct impact of growing demand from new housing. In addition to this, we highlight the need to consider the required mitigation arising from the significant cumulative impact of smaller housing growth. As such, we request that the Council continue its engagement with the NHS to further refine the identified healthcare needs and to ensure proposed solutions consider all levels of growth proposed by the Local Plan, prior to submission.

Further to this, Draft Policy HC14 states that it will consider the expansion of the capacities of existing services within the relevant Primary Care Network in the first instance. NHSPS request the Council to consider the need for flexibility of healthcare providers in determining the most appropriate means of meeting the relevant healthcare needs arising from a new development.

Where new developments create a demand for health services that cannot be supported by incremental extension or internal modification of existing facilities, this means the provision of new purpose-built healthcare infrastructure will be required to provide sustainable health services. Options should enable financial contributions, new-on-site healthcare infrastructure, free land/infrastructure/property, or a combination of these. It should be clarified that the NHS and its partners will need to work with the council in the formulation of appropriate mitigation measures.

#### **Draft Policy NB6A Net zero new build residential development (operational energy)**

Draft Policy NB6A seeks to achieve net zero in new residential developments of 1 or more homes. The NHS requires all new development projects to be net zero carbon, and NHSPS fully support policies that promote carbon neutral development. In considering the implementation of policies related to net zero, we would highlight that NHS property could benefit from carbon offset funds collected where on-site carbon mitigation requirements cannot be met. This would support the NHS to reach the goal of becoming the world's first net zero healthcare provider.

#### **Evidence Base [Local Plan Viability Assessment]**

The draft policy requirements identified in the Plan are supported by the Local Plan Viability Assessment. Having reviewed the report, we note that where contributions towards healthcare have been identified in the policy requirements for site-specific testing, the assessment does not include a specific allowance for contributions towards healthcare.

Without prejudice to any future representations the NHS or its partners may make on specific planning applications or applications for CIL funding, in our view the S106 headroom identified as part of the site-specific testing is generally sufficient to enable financial contributions to be secured for healthcare, and therefore we consider that overall the assessment of plan-wide viability demonstrates that policy requirements in relation to healthcare infrastructure contributions are deliverable. However, we are concerned that without explicit mention of required healthcare mitigation in the viability assessment, healthcare mitigation will compete with other planning obligations or be ignored entirely, rendering development unsustainable and putting future residents' health at risk.

As noted in our general comments above, healthcare facilities are currently experiencing significant strain. Furthermore, if appropriate mitigation is not secured, the growth strategy outlined in the Plan is expected to exacerbate this situation. We would recommend that the viability assessment includes a separate cost input for typologies where a healthcare contribution is expected. This would ensure that healthcare mitigation is appropriately weighted when evaluating the potential planning obligations necessary to mitigate the full impact of a development.

A separate cost input for health would also mean that developers are adequately informed in advance, in accordance with ICB's estate strategy and the development's location and size, that they may be required to make on-site provision or off-site financial contributions to mitigate the impact on healthcare infrastructure resulting from their development. Such an approach would also support the effective implementation of Draft Policy EC11 in situations when a viability assessment demonstrates that development proposals are unable to fund the full range of infrastructure requirements. We would welcome further engagement with the Council to on this issue to determine a reasonable cost assumption that could be used in future viability assessments.

#### **Conclusion**

NHSPS thank South Staffordshire Council for the opportunity to comment on the draft Publication Plan. We trust our comments will be taken into consideration, and we look forward to reviewing future iterations of the Plan. Should you have any queries or require any further information, please do not hesitate to contact me.

NHSPS would be grateful to be kept informed of the progression of the Local Plan and any future consultations via our dedicated email address, [town.planning@property.nhs.uk](mailto:town.planning@property.nhs.uk).

Yours faithfully,

**Hyacynth Cabiles**

Town Planner

E: [hyacynth.cabiles@property.nhs.uk](mailto:hyacynth.cabiles@property.nhs.uk)

**For and on behalf of NHS Property Services Ltd**



South Staffordshire Council  
Wolverhampton Road  
Codsall  
South Staffordshire  
WV8 1PX

22<sup>nd</sup> December 2022

To whom it may concern,

**Letter of Objection: Proposed development at Linthouse Lane, Wolverhampton**

I am writing to formally object to the inclusion of the site at Linthouse Lane, Wolverhampton, in the South Staffordshire Local Plan. Given the recent changes relating to the Black Country Plan, I believe now is the most appropriate time to raise this objection.

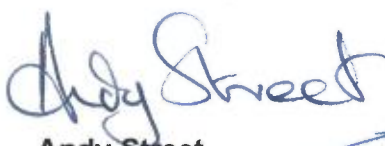
The site at Linthouse Lane is a precious piece of greenbelt land, providing access to green space to residents of both South Staffordshire and Wolverhampton. I am particularly concerned at this proposed development given that within the city boundary, only 11% of Wolverhampton is green space. The Linthouse Lane site therefore provides access to vital green space for the residents of Wolverhampton.

One of my important priorities as Mayor of the West Midlands is to do all I can to tackle health inequalities across our region. Sites like these are crucial to tackling such health inequalities, by providing residents with ready access to a space for exercise and recreation. These benefits are hugely significant in themselves, before one even considers the positive effect green spaces such as this one also have on air quality and biodiversity.

Alongside the clear negative consequences of the development in terms of access to green space, I am also concerned at the ability of local infrastructure in both council areas to cope with the increased demand. For example, junctions with Wood End Road, Kitchen Lane and Griffiths Drive will be directly affected by the increase in traffic flow such a development would bring – and indeed Linthouse Lane is already a particularly busy road.

For these reasons, I sincerely hope this site is removed from consideration and a more appropriate site found, to preserve this important piece of green space.

Yours sincerely,



**Andy Street**  
Mayor of the West Midlands

**Andy Street CBE**  
Mayor of the West Midlands

16 Summer Lane, Birmingham, B19 3SD

**Appendix E1 – Staffordshire County Council Issues & Options Rep.**



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Local Plans Team  
South Staffordshire Council  
Council Offices  
Wolverhampton Road  
Codsall  
South Staffordshire  
WV8 IPX

Via Email only

30<sup>th</sup> November 2018

Dear Kelly

**Re: Local Plan Review – Issues and Options Consultation**

Thank you for consulting Staffordshire County Council on your Local Plan Review Issues and Options document. We acknowledge that the Site Allocations Plan commits South Staffordshire to undertake a full Local Plan review and submit a new Local Plan for examination by 2021. It is acknowledged that because of recent changes to the planning system there is a requirement to consider the unmet needs of neighbouring authorities. The Plan is clear on this point and seeks to address the challenges that present as a consequence, which is to be commended.

This Issues and Options stage represents the first step in the process and we would wish to work alongside you throughout the process to help understand the issues; shape solutions; and the delivery of a sound plan. This process of engagement has already begun in relation to the Duty to Co-operate. We have discussed the high-level implications for the Plan across County Council functions and infrastructure. We hope and expect this co-working to continue throughout the Plan making process and therefore just summarise the key points at this juncture.

We have also extended co-operation across borders into the Black Country to understand the possible implications of growth on school places. As spatial



directions of growth begin to emerge we may also need to extend cross border consideration to other types of infrastructure.

Section Three of the Plan begins by setting out the issues that the Plan will need to address. We agree that these broadly cover all the relevant areas of interest.

We acknowledge that the issue of housing the ageing population of South Staffordshire and providing suitable specialist homes for other groups such as those with disabilities, which will be important. We have advised you that we have undertaken a Staffordshire wide assessment of the supply and demand for housing with care (Care homes and Extracare) and have committed to undertaking a locality analysis of existing provision in South Staffordshire alongside locations of GP surgeries, supermarkets, public transport links etc that help to provide for independent living. These two pieces of work alongside your SHMA should help inform and shape the provision of appropriate accommodation needs for an ageing population, whose needs can be quite diverse.

As noted earlier assessment of education infrastructure will be important in considering the spatial distribution and scale of growth in housing across the district. We will work closely with you and neighbouring authorities where relevant to ensure suitable provision is or can be made available for existing and new populations.

It is acknowledged that the Plan makes reference to understanding the implications of the West Midlands Interchange proposal if permitted. In accordance with the timeframes for assessment of Nationally Significant Infrastructure Projects a decision is expected within 12 months of the formal start of the examination. Whilst no date has been set yet it is anticipated that the examination will be during Quarter One of 2019 and therefore follows a decision being issued in Quarter One of 2020, which is just before the scheduled publication of your draft Plan.

The vision for the Plan is supported as are the main objectives, subject to minor points raised in the thematic sections below.

The proposed Evidence Base covers most of the relevant areas, though there will be a need to consider Education Impacts with the County given the scale of growth being considered.

Section 4 sets out the levels of growth proposed for the District. It is acknowledged that the District is seeking, through this plan, to meet some of the unmet needs arising out of the Greater Birmingham and Black Country Housing Market Area (HMA). Based on the evidence and current position across the HMA we would agree with South Staffordshire that Option C represents a proportionate and appropriate housing target of a minimum of 9,130 units for the District over the Plan period. It will be important as the Plan progresses for this target to not fluctuate significantly as this will affect infrastructure evidence and requirements that could consequently have implications for directions of growth.

The Plan period of 2018-2037 aligns appropriately with National Policy recommendations for strategic policies to extend over a period of 15 years from the point of adoption.

On the matter of safeguarded land this in the past has caused complications in relation to how and when it should be considered in regard to infrastructure delivery. With Government now requiring Local Plans to be reviewed every five years it would seem to make more sense to not include smaller parcels of safeguarded land as these could be picked up during a review and provide greater flexibility to address the issues at the time. In contrast if a large strategic site, because of its size, may be delivered over two plan periods in which case it may be prudent to consider safeguarding the proportion that will not come forward with in the current Plan period. This would provide longer term clarity on direction for growth and infrastructure requirements.

Section 5 sets out the locations for growth. Given the number of options and scale of County Council functions we will not comment on each in details at this stage but would seek to work with you as you refine the options to preferred locations for growth. We would note however that dispersed growth over a wide area will complicate the planning and subsequent delivery of the infrastructure required to support the level of growth proposed.

Set out below are comments on a thematic basis answering the consultation questions where relevant.

## **Economy**

### Employment – level of growth

#### Economic Development Needs Assessment (EDNA)

*Question 13: Which of the above option(s) do you think should be pursued? Are there any other options to consider?*

The only option that would appear to deliver a sound local plan is option C. The local plan will need to consider the likely undersupply of employment land in parts of the Functional Economic Market Area (FEMA) and consider this accordingly.

We believe that the amount of employment land allocated will need to consider the levels of distribution of housing growth. It does seem counterintuitive that the preferred option for housing need is far in excess of the current Core Strategy, whilst there is deemed to be a current oversupply of employment land. Of course, this is at least partly due to meeting the housing need of the GBBCHMA, whilst potentially allocating more employment land to meet the need across the FEMA will provide a closer match between housing and employment growth across the District. The distribution of housing will be a key consideration as we would expect the development of new settlements to include an element of employment provision, depending on their scale.

*Question 14: Do you agree that the EDNA (stage 1) has been undertaken in line with national guidance and is a robust starting point for planning for future employment needs?*

Agreed

*Question 15: If granted approval, what implications will the SRFI proposal at Four Ashes have for the Local Plan review?*

Through the development of the Employment, Skills and Training Plan (ESTP) for the SRFI proposal we expect the site developers to maximise the benefits of the scheme for residents within the locality. This includes employment support to target the long-term unemployed and economically inactive. The ultimate success of the ESTP, and the pace of build-out and occupation of the site, may influence the need for further housing within the area. There may be a need consider the SRFI, but this is likely to be in the medium to longer-term of the plan period.

*Question 20: Which of the above option(s) do you think should be pursued? Are there any other options to consider, including a strategy which aims to provide a mixture of the spatial options set out above?*

As per our response to Q13 we believe that the best spatial distribution of employment land will be very much dependent on the distribution of housing. A mixture of the spatial options is therefore likely to be the most appropriate strategy. The County Council continues to support the development of the freestanding employment sites and these have largely been very successful in creating high-value jobs within the area. These types of large employment sites continue to be vital in taking advantage of large-scale inward investment opportunities. The delivery of new settlements and/or urban extensions will also likely require an element of employment developments to maximise sustainability where possible.

*Question 21: If it is appropriate for the Council to consider the delivery of new freestanding strategic employment sites, what criteria should be used in identifying new strategic sites for employment growth?*

Deliverability will be vital, and we would therefore suggest the following criteria:

- Ownership
- Market interest
- Access
- Availability of utilities
  - Mains water supply
  - Mains sewerage
  - Electrical supply
  - Gas supply
  - Public highway
  - Landline telephone / broadband internet
  - Public Transport
- Suitability issues
  - Land in other ownership must be acquired to develop the site
  - Restrictive covenants exist
  - Current use needs to be relocated
  - Physical constraints (topography, trees, other)
  - Public Rights of Way cross or adjoin the site
  - Contamination / land stability
  - Conservation area / listed buildings
  - Nature conservation / ecology
  - Utilities (high pressure gas pipeline / electricity pylons / water infrastructure)
  - Green Belt
  - Flood plain
- Timescale for availability

*Question 52: Should we allocate new sites for specific employment use classes? What should the breakdown between the B1, B2 and B8 class uses be? Please provide evidence to support your response.*

We would expect the allocation of employment land to consider the need for specific use classes. This should be considered through the EDNA and review of relevant strategies. However, the need for B1 is likely to be minimal given office developments tend to be best placed with cities and larger towns, as acknowledged within the issues and options document, although it may be beneficial to consider another well-positioned office site development similar to Dunston Business Village elsewhere within the District.

Given the SFRI proposal, the delivery of land for B8 will also need to be considered in this context. If permission for the proposal is granted, it is very unlikely that there will be a need to allocate any further land for large logistics operations within the District, although smaller B8 developments may still need to be considered.

*Question 53: If we continue with a criteria-based policy that safeguards employment land for that use unless specific criteria can be met, are the criteria in the existing Core Strategy Policy EV1 still appropriate or should they be revised?*

The deliverability of employment sites needs to be considered if they are not coming forward and being developed. We believe that there should be a policy that reviews sites that do not come forward within a certain time-period and where there is no realistic prospect of a site progressing then it should be deallocated or reallocated for an alternative use.

*Question 54: Should we be looking to allocate office (B1a) use given their status as a town centre use and the lack of main towns in the district?*

See response to Q52.

*Question 55: Should the current approach of relying on neighbouring urban town and cities to meet our higher order office needs continue?*

See response to Q52.

## **Education**

Staffordshire County Council has a statutory duty to ensure that there are sufficient school places to meet the needs of the population. The School Organisation Team (SOT) acts on behalf of the Local Authority to carry out this duty and to ensure that resources are used efficiently.

The district of South Staffordshire is made up of four distinct areas when considering school place planning; Cheslyn Hay & Great Wyrley, Kinver & Wombourne, Codsall & Perton and Penkridge.

A two-tier education system, with Primary (4-11 years) and Secondary (11-18 years) schools, operates in Cheslyn Hay & Great Wyrley and Kinver & Wombourne, whilst in Codsall, Perton and Penkridge, a three-tier system with First (4-9 years), Middle (9-13 years) and High (13-18 years) schools, operates.

For the purpose of school place planning the district is broken down into smaller planning areas which are used to plan the number of school places required. These have been grouped based on the geographical location of schools, and by assessing pupil movement between schools and catchment areas.

Cheslyn Hay & Great Wyrley contains eight primary schools and two high schools which are divided into 2 primary school planning areas and 1 high school planning area.

Kinver & Wombourne contains eight primary schools plus one infant and one junior school and two high schools which are divided into 2 primary school planning areas and 1 high school planning area.

Codsall & Perton contains six first schools, one catholic primary school, three middle schools and one high school which are divided into 2 first school, 1 middle school and 1 high school planning area.

Penkridge contains eight first schools, one catholic primary school, two middle schools and one high school which are divided into 2 first school planning areas, 2 middle school planning areas and 1 high school planning area.

St Leonards CE (VC) First School at Dunston is its own planning area.

In addition, The Rural Enterprise Academy operates as a standalone education provider for year 9 to year 11 pupils.

Sixth form provision is offered on site at all secondary and high schools within the district. In addition, South Staffordshire College is a standalone higher education provider. With regards to Q49 - There is no requirement for a specific policy for South Staffordshire College as it is not the only provider of higher education within the district. (Q49 of Issues and Options consultation)

An initial desktop analysis has been completed for all school sites in South Staffordshire, in terms of potential expansion using the Department for Education Area Guidelines for Mainstream Schools Building Bulletin 103 (2014). This could help inform infrastructure options for testing any spatial distributions of growth. However, an extensive feasibility study and cost analysis would need to be undertaken to determine fully whether a school can be expanded to the size indicated on the desktop analyses.

There are many different options and scenarios being considered as part of Plan Issues and Options Consultation. It is noted that the preferred option is to deliver 9,130 houses. This number would influence what additional capacity would be needed and whether this would take the form of expanding existing local schools and/or the provision of new schools.

The Plan should help to ensure that there is sufficient education infrastructure available to meet the needs of the homes that are proposed to be delivered in a specific area. This could mean that land is allocated for educational infrastructure when considering areas for development. When considering provision of land that could be land a that is adjacent to existing schools that facilitates their growth or land within a large proposed development that could provide a new facility.

For clarity a development or a cluster of small developments of 750 dwellings may trigger the need for a new first/primary school; around 4,000 dwellings for a new middle school; and 5,000 dwellings for a new high/secondary school.

It should be made clear to prospective developers that large residential sites of 750 plus dwellings would likely be required to provide land for school site(s) in addition to education contributions to mitigate the development. Where development is proposed over several small to medium sized sites in an area that totalled 750+ dwellings it may be the case that land would be required for education provision. In such circumstances the Plan should be clear on the land to be allocated and how it would be provided and funded by development.

The preferred housing growth Option C of 9,132 dwellings is likely to yield a total of 1,370 first school places, 1,096 middle school places, 822 high school places and 274 post-16 places if all the dwellings were in the three-tier areas. If all the dwellings were in the two-tier areas a total of 1,918 primary school places and 1,370 secondary school places and 274 post-16 places would be required. It should be noted that if the developments are spread across the whole SSDC area then a combination of provision would be needed of three-tier and two-tier. This level of detail cannot be provided at this stage, where the location of all dwellings is not known. We are happy to work with the District Council during the sites selection process to help inform the process. It should be noted that these numbers do not include additional Nursery provision.

Any new first schools would need to be at least 1 Form Entry (FE) (150 places) and would require land of 7,635m<sup>2</sup> to be allocated to facilitate this. To deliver a new 1FE First (150 places + nursery provision) would cost in the region of £3.8 million (as at Q2-2018).

Any new primary schools would need to be at least 1FE (210 places) and require land of 11,415m<sup>2</sup> to be allocated to facilitate this. To deliver a new 1FE Primary (210 places+ nursery provision) would cost in the region of £4.9 million (as at Q2-2018).

Any new secondary schools would need to be at least 5FE (750 places) and require land to be allocated to facilitate this. (70,136m<sup>2</sup>- 86,076m<sup>2</sup>). To deliver a new secondary school of 5FE would cost in the region of £20 million plus.

A new school site would need to be of regular shape, level topography, without significant topographical features that would be considered incongruent with the site's use as a school. It would also need to be provided drained, free from contamination and other adverse ground conditions, serviced and suitable for the phase of education proposed.

There would need to be a vehicular access route from the adopted highway to the school site at least sufficient and suitable for construction vehicles and vehicles for the delivery of materials for the construction of the school on the school site until the school opens at which point the vehicular access needs to be of an adoptable standard.

Additional land adjacent to any new school may also need to be earmarked as education land to safeguard future growth.

As noted above we would wish to continue to work alongside the District Council whilst decisions are made as to the spatial direction of growth to ensure that there is adequate provision for education infrastructure. As the housing allocations are being considered, the school organisation team can consider the appropriate education infrastructure solutions required to mitigate the impact of the proposed new residential development, ensuring the best solution is found through continued liaison. For areas where there are pressure points consideration would be given for potential expansion of existing school sites and in the more rural areas we would also look to consider the implications on school transport.

We will continue to work alongside neighbouring Local Authorities to establish the impact of the Local Plan housing in South Staffordshire and their own Housing requirements on the potential impact on cross border pupil movement.

For accuracy, with regards to Bilbrook/Codsall the Plan states:

*“there is limited capacity to expand in Codsall school planning area It is confirmed that the safeguarded land coming forward in these areas will trigger the need for a new primary school”.*

Please note that this is a three-tier system, and should a new school be required this would be a first school, not primary. The allocated safeguarded land does not on its own trigger the need for a new first school as the total number of safeguarded houses is 576. This can be discussed further as part of our ongoing discussions.

## **Transport**

### What does the Local Plan need to consider?

*Question 3: Do you have any comments on the vision, and objectives to deliver the vision set out above? If yes, then please provide details.*

As well as supporting sustainable transport provision and highway infrastructure, the objectives should acknowledge the growing role of telecommunications in reducing the need to travel and the use of more energy efficient vehicles, including electric vehicles. The Department for Digital, Culture, Media and Sport is currently consulting on proposals to mandate that new build homes are able to access gigabit-capable connections. This consultation closes on 21 December 2018 and it will be necessary to consider the outcomes of this consultation and Government policy in shaping any future policy on Telecommunications.

*Question 4: Do you think that the key evidence set out in Table 3 is sufficient to support the preparation of the Local Plan review? If not, what additional evidence is required?*

It is recommended that the South Staffordshire District Integrated Transport Strategy, published October 2017 is included in the list of evidence. It informs the Infrastructure Delivery Plan and will be updated as necessary as part of the local plan process.

### Level of Growth

*Question 15: If granted approval, what implications will the SRFI proposal at Four Ashes have for the Local Plan review?*



The potential impact of the SRFI from a transport perspective is summarised in the District Integrated Transport Strategy. Due to its likely significant impact on traffic volumes on the local and strategic highway network, the implications of the SRFI need to be considered when appraising the cumulative traffic impact of housing and employment growth options.

#### Methodology - preferred spatial distribution and sites for development

The County Council will provide appropriate evidence to the District Council to help identify the potential highway and accessibility impact of strategic housing development locations set out in the Housing Market Area (HMA) Strategic Growth Study, together with any additional strategic locations within the six spatial options presented. Key considerations will include:

- Levels of sustainable transport accessibility, taking into account the requirements proposed in paragraph 5.18 of the District Integrated Transport Strategy. It will be essential that new developments are served by high quality rail and/or bus connections to new and existing jobs, education and services and, where possible, residents should be able to walk or cycle to local facilities. Assessments need to reflect the very limited funding available to support socially necessary bus services.
- The impact of traffic generated from proposed new development sites. This could be informed by existing traffic volume and journey time data, spreadsheet models (to be developed) and available strategic traffic models.

Cross-boundary discussions will be required to identify potential highway capacity issues in neighbouring authorities such as Stafford Borough and in the West Midlands conurbation, considering potential future travel to work patterns.

#### Homes and Communities

##### Parking provision

The County Council's priorities for car parking in South Staffordshire are outlined in the District Integrated Transport Strategy and the need for HGV parking is recognised in the Freight Strategy for the County of Staffordshire, due to be published in 2018.

*Question 43: Should we allocate new HGV parking and if so what evidence would need to be prepared to inform this? If a need for additional facilities were identified, should there be a focus on extending existing facilities, or should wholly new facilities be identified?*

There is an existing shortage of lorry parking in Staffordshire as identified by the DfT National Survey of Lorry Parking 2017, with existing facilities concentrated around the A5 and M6. The West Midlands region also has critically high usage of lorry parking facilities, so the County Council would support the provision of new facilities. It is also recommended that new development that will increase road based freight should consider where vehicles will park overnight and provide suitable facilities to accommodate deliveries and distribution vehicles.

## Travel to Education

The most sustainable housing developments will enable walking and cycling access to both primary and secondary school, however for many villages in South Staffordshire, walking access to a secondary school may not be possible. Children making journeys to education of beyond two miles for primary and three miles for secondary to their nearest or catchment school are eligible for free school transport generally. Also journeys that are not safe to walk are similarly eligible. This will create additional budgetary pressures for Staffordshire County Council and consideration should be given to the requirement for developers to contribute to school transport to offset this additional cost.

Developers of new housing sites that will generate school trips could also consider contributing to sustainable travel initiatives and road safety education and training in schools as part of their Travel Plan.

## Economic Vibrancy

### Employment Sites

The transport implications of currently proposed strategic employment sites are highlighted in the District Integrated Transport Strategy. The agreed access solution for the ROF Featherstone site will depend upon the land use mix for the site that emerges through the local plan process. The potential for the site to be served by a new rail station on the West Coast Mainline is being considered by Midlands Connect, and the County Council and Network Rail will be engaged in this feasibility work.

### Public transport and the highway network

*Question 66: Are there any areas where highway capacity is a concern where:*

- a) Development should be restricted; or*
- b) Where new development could facilitate road infrastructure improvements*

The potential mitigation of current highway capacity issues in South Staffordshire are discussed in the District Integrated Transport Strategy, including strategic highway infrastructure, local junction improvements and traffic management measures required to deliver the adopted Core Strategy. The County Council will work with the District Council to identify further highway improvements required to inform the spatial distribution of development in the emerging local plan. The assessment will assume completion of committed highway schemes such as the M54/M6 Link Road.

A priority will be to locate development within easy access to the rail network. The District Integrated Transport Strategy identifies the improvements to rail services and facilities that are considered necessary by the County Council. Further improvements may be required to accommodate growth in rail patronage that may result from the preferred spatial distribution of development.

*Question 67: Should the Local Plan include a policy that requires development to incorporate electric charging points? Should there be a threshold for the number of new dwellings on a new development where this would be required?*

Developers should be encouraged to install infrastructure to facilitate electric vehicle charging at employment locations and for designated parking spaces within residential developments. The County Council is planning to commission a study to consider the future need to develop a network of electric vehicle charging points and the outcome of the study will be shared with the District Council.

### Electronic communications

*Question 69: Should the new Local Plan include a policy that requires all new housing and employment developments to have a connection to fibre optic broadband?*

See comments in relation to Q3 above. In addition to encouraging sustainable travel, the provision of superfast broadband by developers will reduce the need to travel by car, making developments more sustainable. As stated in the District Integrated Transport Strategy, developers need to be strongly encouraged to make the necessary arrangements with the commercial providers for the provision of superfast broadband services.

## **Ecology**

### Local Plan Review Issues and Options paper

*Question 71: What compensatory improvements (to offset removing land from the Green Belt) to the environmental quality and accessibility of remaining Green Belt land should be considered and how should they be implemented?*

Compensatory improvements to offset removing land from the Green Belt should include habitat creation and creation of accessible natural greenspace. However most of this land is in private ownership and so in order to achieve this the cost of acquiring and / or taking lands out of mainstream production needs to be factored in. It is also important to acknowledge that a high proportion of green belt away from footpaths is currently inaccessible.

*Question 72: Which of the option(s) do you think should be pursued? Are there any other options to consider?*

Option 1 offers greater opportunities to include ecological features and connecting networks, however these would probably best be included in a separate policy covering all areas not only open countryside.

*Question 74: Which of the option(s) do you think should be pursued? Are there any other options to consider?*

Option B would better reflect the current aims of NPPF. It is important to retain a policy that protects the hierarchy of designated and local sites. These sites should be protected, but also be seen as building blocks for the development of ecological networks. The inclusion of an additional policy that paves the way for the development of ecological networks will be key to ensuring that these networks are recognised and developed.

Paragraphs 9.24 – 9.28 seem to switch between discussion of the Cannock Chase AONB as a landscape designation and the Cannock Chase and Motte Meadows SACs. It would be helpful to have a clear separation of these considerations

*Question 75: We believe that Core Strategy Policy EQ2 should be updated to accord with the emerging evidence for the SAC set out above; do you agree with this approach and are there any other options to consider?*

It is agreed that Policy EQ2 should be updated to reflect emerging evidence base.

*Question 76: What are your views on the level and variety of open space provision in the district? Should there be a greater emphasis on a particular type of open space (e.g. incorporating natural and semi natural elements)?*

There needs to be a strong emphasis on provision of large areas of natural greenspace because of the need to provide alternatives to protect Cannock Chase SAC and potentially other sites. While the original Accessible Natural Greenspace standard (English Nature 2003) may be difficult to achieve in some areas it would be worth revisiting the principles it outlines (defining sizes of greenspace and how close they should be to numbers of population) and how these might be defined for the District.

Paragraph 9.30 states that:

*'It has generally been considered that the rural nature of the district combined with an extensive network of public rights of way which connect settlements with the Open Countryside affords a good level of access to natural and semi natural spaces.'*

While many settlements do have good networks of paths, some do not, and most settlements are surrounded by arable land that cannot be described as natural or even semi-natural. The District's rivers are mainly steep-sided channels which lie well below the floodplain and have become largely invisible, while many of the woodlands are kept for game shooting.

*Question 77: Should we review the current Open Space Standards set out in Policy SAD7 of the Site Allocations Document (SAD) to reflect the findings of an updated Open Space Audit?*

The current Open Space Standards should be reviewed to reflect the findings of an updated Open Space Audit

### Habitats Regulations Assessment

Para 2.7 Should more appropriately read: South Staffordshire is situated on a watershed between the River Trent and River Severn Catchments and therefore the following European sites are included

Motte Meadows – recreational pressure should perhaps be included if local housing numbers are likely to rise significantly. The site is connected to Wheaton Aston by footpaths.

Pasturefields Salt Marsh – the qualifying feature is listed incorrectly as Great Crested Newt. The qualifying feature is actually:

1340 [Inland salt meadows](#) \* Priority feature

Sections 4 and 5 appear to confuse / join the Humber SAC and Severn SAC and their separate designations as 'Humber and Severn Trent SAC/SPA/Ramsar'

### LPR SA Scoping Report

References to NPPF are now out of date, and therefore underplay the role of net gain for biodiversity or importance of ecological networks. Paragraphs 5.1.4 and 5.2.11 refer.

5.2.10 would best be amended to read: Local Wildlife Sites (LWSs) are non-statutory designated sites, identified by local authorities in partnership with nature conservation charities, statutory agencies and ecologists, although they are mostly privately owned. In South Staffordshire, LWSs are comprised of Sites of Biological Importance (SBIs) and Natural Heritage Sites Biodiversity Alert Sites. Grade 1 SBIs are of a greater ecological value than Grade 2 SBIs BASs. There are a total of 69 LWSs spread throughout South Staffordshire.

## **Historic Environment**

### Local Plan Review Issues and Options paper

In relation to Table 3 Evidence Base. It is noted that the table includes the Extensive Urban Surveys, Conservation Area Appraisals and Conservation Area Management Plans, in addition there is also the Historic Environment Site Assessment (HESA). These documents are considered sufficient providing that the HESA in particular is up-to-date and has addressed all of the sites which are to be considered.

*Question 81: Which of the option(s) do you think should be pursued? Are there any other options to consider?*

Option B, which retains the current policy focus on the conservation and enhancement of heritage assets, including non-designated archaeological sites and monuments, with an SPD providing greater detail on achieving the aims of the policy is to be welcomed. Such an SPD would provide guidance to understand existing character and how this can inform new development as well as providing a benchmark for assessing success and, potentially, providing further informing best practice. The SPD could be used to strengthen consideration of the archaeological resource and the appropriate resources for consultation by developers.

### LPR SA Scoping Report

## **Chapter 9 Historic Environment**

The report (2017) has not consulted the Staffordshire Historic Environment Record (HER) for information on the non-designated archaeological resource. Paragraph 9.2.7 makes reference to the holdings of the Archaeology Data Service (ADS). It should be noted that the ADS does not provide a comprehensive record of the archaeological resource and should not have been consulted in isolation without consultation with the HER. Consequently, this chapter has failed to understand the full range of the historic environment resource of the District.

Box 9.1 on page 54 – bullet point 2 should more appropriately read “The known and unknown archaeological resource surviving as both below and above ground remains...”.

Box 9.2 on page 54 –Non-statutorily protected and non-designated heritage are included within the National Planning Policy Framework (NPPF) and so are afforded consideration beyond the LPR.

## **Public Rights of Way**

We welcome the inclusion of footpaths as part of the Design Principles set out in the SPD and the suggestions that footpaths should be considered as a necessity to link public areas, as enhancements to the setting of developments and as key connections between urban and rural areas. Footpaths come in many forms – as link routes within housing developments, as permissive footpaths and as public rights of way as described by the Definitive Map of Public Rights of Way.

When future sites are considered for development, some of them will be crossed by public rights of way which will need to be considered in full as part of any proposed development. We have recently published the 4th Review of the Definitive Map and Statement for South Staffordshire and the District Council have been provided with copies of the maps and Statement to indicate the alignment of all recorded routes. We encourage the planning authority to ensure that all public rights of way are protected and, where possible, enhanced in conjunction with any development. If any Public Path Orders are required to enable the development to take place these should be processed alongside the planning application by the District Council.

Many of the sites may be close to existing urban areas and it is likely that there are non-definitive routes across the sites which should be considered by any applicants. In many cases these routes could have become rights of way by virtue of established usage over many years and should be treated as public. There will also be sites where such usage or historic evidence has already resulted in applications being made to the County Council under Section 53 of the Wildlife and Countryside Act 1981 to add or modify the Definitive Map of Public Rights of Way, which affects the land in question.

Where development can enhance the existing path network this should follow Staffordshire County Council's Rights of Way Improvement Plan and could include:

- the creation of public bridleways or the upgrading of public footpaths to bridleways to improve provision for horse riders and cyclists across Staffordshire where there is currently a shortfall in available access routes.
- the creation and promotion of short circular walks to promote the health benefits of walking
- the replacement of stiles with gaps (where there are no stock) or gates (where there are) in line with Staffordshire County Council's Least Restrictive Principle for path furniture

The County Council expects to be consulted on any future applications in due course that would affect a right of way and is able to provide further advice and guidance as and when required.

## **Minerals and Waste**

*Question 22: Has the Council identified the key factors which should inform which of the Spatial Distribution Policy Option(s) is taken forward in the Local Plan review? If not, what other factors should inform the spatial distribution of development?*

It is noted that through the Sustainability Appraisal (SA) of policy options there is a reference to mineral safeguarding sites as an indicator for SA Objective 6 (Natural Resources) but in assessing site options for development, consideration should be given to the requirements of paragraph 206 of the [NPPF](#) and policy 3 (Safeguarding minerals of local and national importance and important infrastructure) of the [Minerals Local Plan for Staffordshire](#) (MLP). As well as assessing the effect on mineral resources, there is also a need to consider the implications of options on permitted and allocated mineral sites (refer to the [Policies and Proposal map](#) for the MLP showing safeguarded mineral/infrastructure sites) to ensure that proposals would not unduly restrict permitted/proposed mineral operations.

Within South Staffordshire District, there are two allocated sand and gravel sites but one of these sites would be directly affected by the current application for the West Midlands Interchange at Calf Heath. In the Cheslyn Hay area, there are permitted clay extraction operations which provide an important source of clay for a local brick works at Lodge Lane and at clay product works further afield.

The assessment of sites should also consider the requirements of paragraph 8 of the [National Planning Policy for Waste](#); and policy 2.4 (Strategic waste facilities to be safeguarded) and policy 2.5 (the location of development in the vicinity of waste management facilities) of the [Staffordshire and Stoke-on-Trent Waste Local Plan](#) (WLP) which aim to safeguard the efficient operation of waste management facilities including the strategic energy recovery facility at Four Ashes. The broad location of waste management facilities is shown on the [policy map](#) for the WLP but more detailed information on the location of facilities can be provided by the Waste Planning Authority.

## **Flood Risk**

On the Flooding and Pollution section of the Issues and Options document it would be useful to add reference to our SuDS Handbook, which should also be considered in policy formation for the Plan in due course.

The impact of development on water quality (section 9.45) can be mitigated through the use of a suitable SuDS management train approach. Whilst the national SuDS standards focus on water quantity (discharge rates and volumes), the SuDS Handbook includes local standards which aim to achieve water quality treatment and amenity value as well.

## **Housing for Older Persons**

Section 7 of the Plan sets out options for the mix of housing required to be provided for. As discussed above provided appropriate accommodation for an ageing population will be a key consideration for the Plan.

*Question 28: Which of the above option(s) do you think should be pursued? Are there any other options to consider?*

A combination of Options A and C would seem to offer the most coverage and would be suitably informed by the evidence. For some larger scale sites consideration could be given to extracare type development if the location, including surrounding amenities and services are suitable. In order to be viable extracare schemes need to include a minimum number of units so they could be suitable for larger scale sites. As discussed above the work we are preparing coupled with the SHMA should help inform decision making on sites and policy formation.

*Question 29: Which of the above option(s) do you think should be pursued? Are there any other options to consider?*

See response to Q28. In addition to numbers and location criteria homes for older persons need to be aspirational to create the desire/incentive to undertake move from the more traditional 'family home'.

## **Public Health**

We acknowledge that the Plan seeks to address health and wellbeing issues.

*Question 46: Which of the above option(s) do you think should be pursued? Are there any other options/design measures to consider?*

As Option B supports the 'Health in all Policies' agenda we would support following this approach. Our public health team would be happy to work with you to shape how policy around health and wellbeing evolves.

Yours sincerely

**James Chadwick**  
**Planning Policy Officer**



**Appendix E2 – Staffordshire County Council Spatial Housing Strategy and Infrastructure  
Delivery Plan Rep.**

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South Staffordshire  
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Via Email only

12 December 2019

Dear Kelly

**Re: Local Plan Review – Spatial Housing & Infrastructure Delivery**

Thank you for consulting Staffordshire County Council on your Local Plan Review Spatial Housing Strategy & Infrastructure Delivery document. We acknowledge that this consultation was discretionary on the part of South Staffordshire District Council and recognise the benefits of consulting on the approach to housing growth.

At the last round of consultation, we set out that it would be important for the housing target to not fluctuate significantly as it would affect infrastructure evidence and requirements. Section 2.4 of the Plan stipulates that if the extent of the housing shortfall from the wider Housing Market Area falls then the contribution South Staffordshire is making may reduce. Should this occur then there may be consequences for infrastructure requirements that could ultimately affect the scale of growth in certain locations.

We also noted that we have been liaising with the Black Country authorities to understand the possible implications of growth on school places. As the preferred Option G looks to deliver circa 40% of the housing growth via urban extensions to neighbouring urban areas, we can start to consider what areas will be affected in more detail as sites begin to emerge. It will be important to continue a dialogue



with the neighbouring authorities to understand any infrastructure issues and agree how any required schemes, if any, will be delivered and funded.

We acknowledge the search for a New Settlement and have a lot of experience around the Ministry for Housing Communities and Local Government garden settlement programme; sustainability appraisals; addressing deficit in existing infrastructure; and associated 'policy-off' process considerations. We would be able to help shape the thinking around the concept and would welcome the opportunity to engage in early discussions. Given the area of search defined in the preferred option it may also be worthwhile considering applying the Garden Settlement principles to the existing villages within the area of search to compare how they would perform against a standalone new settlement.

## **Transport**

The transport comments provided on the Issues & Options document are still applicable including:

- The need to assess sites in terms of all methods of sustainable transport and reducing the need to travel, informed by accessibility analysis
- Consideration of the cumulative traffic impact of committed sites and the preferred growth option, informed by existing traffic volume and journey time data, spreadsheet models (to be developed) and available strategic traffic models, taking into account committed transport schemes
- Working with the County Council and public transport providers to identify sustainable transport and highway mitigation required to accommodate the preferred growth option

In relation to moving the plan forward it is noted that Highways England have recommended that the larger scale housing allocations proposed in the preferred option should be assessed to determine their impact along the Strategic Highway Network. Where possible a strategic transport modelling approach should be followed to enable the impact on their network to be determined and for mitigation measures to be tested. SCC has requested access to Highways England's SATURN Model (prepared to support the case for the M54-M6 Link Road) for this purpose. Elsewhere in South Staffordshire where there is no available strategic model coverage, the impact of generated traffic on surrounding highway networks will be initially determined using other transport planning techniques supplemented by appropriate traffic modelling.

Consultants have been appointed by Staffordshire County and South Staffordshire Councils to examine the case for a new railway station with parking facilities to be provided at Brinsford. The first stage of the study will identify whether there are any insurmountable constraints in terms of engineering, timetabling and finance for the project.

### **Preferred Option – Spatial Housing Strategy Option G**

The Page 42 summary should emphasise that the A449 corridor has been chosen as a search for a new settlement due to its good connectivity to the M6, M54 and rail network at Penkridge, together with the highway capacity benefits associated with the proposed M54/M6 Link Road. However, traffic modelling will be required to ensure that a new settlement can be accommodated in transport terms.

The 'strategic infrastructure needs around the ROF Featherstone strategic employment site' requires definition, such as the M54/M6 Link Road and the desire for a new rail station. The ROF Featherstone access road, is solely required to serve the development site and does not have significant wider strategic traffic benefits

At Paragraph 5.3 it is recognised that the accommodation of the preferred growth strategy will need to be supported by new infrastructure, however in order to make the strategy sustainable and affordable, it is essential to make best use of existing infrastructure.

The preferred strategy focuses on sustainable accessibility by public transport. There also needs to be recognition of all methods of sustainable travel and opportunities to reduce the need to travel. It is acknowledged that the Sustainability Appraisal favours development sites that are accessible to the four rail stations in South Staffordshire and the need for sustainable transport options. It is expected that this will be carried through to policies and mitigation proposals.

### Glossary of Terms

The following amendments are required to the Glossary for future iterations of the Plan:

- Local Transport Plan – This is the South Staffordshire District Integrated Transport Strategy.
- Infrastructure – As well as roads, this should refer to rail and bus provision, walking and cycling routes and broadband.
- Green Infrastructure – This should refer to off-road walking and cycling routes.

### Appendix 3: Options for Growth and Rationale

Due to the proximity of Cannock Chase Special Area of Conservation (SAC) to potential development locations in Penkridge, Huntington and South of Stafford, consideration should be given to the potential for increased traffic flows within the SAC boundary.

The following high-level sustainable transport requirement at each main growth location should be acknowledged. Highway mitigation, generally in the form of junction improvements, is also expected to be required to accommodate residual traffic growth on the local highway network, to be determined through appropriate traffic modelling to inform the local plan and transport assessments submitted with planning applications.

Bilbrook / Codsall - Recently enhanced rail services at Codsall will support growth at this location. Significant enhancements to Bilbrook and Codsall rail station facilities including growth in car parking will be required and the establishment of Community Rail Partnerships, will be desirable. In the longer term, improved frequency of rail services to Bilbrook will be beneficial, together with electrification

of the Wolverhampton to Shrewsbury line, re-signalling and an increase in line speed.

It will be important to improve bus accessibility to the conurbation, particularly to Wolverhampton, and integrate new development sites with the existing settlement, particularly in terms of walking and cycling permeability.

Cheslyn Hay / Great Wyrley / North of Black Country conurbation – Recently enhanced rail services at Landywood will support growth at this location. Significant enhancements to Landywood rail station facilities, including growth in car parking will be required and the establishment of a Community Rail Partnership, will be desirable. In the longer term, direct services on the Chase Line to Stafford and beyond would be beneficial.

Opportunities to enhance bus accessibility north towards Cannock and south to the conurbation would be supported and integration with existing settlements, particularly in terms of walking and cycling permeability, will be important.

Wombourne / Western Edge of Black Country urban area - As recognised in Appendix 5, Wombourne receives a lower score in terms of public transport accessibility to employment compared to other locations served by rail. In order to minimise vehicle trip generation, new residents will need to rely on high quality and frequent bus services, particularly to the conurbation. Local accessibility and integration with the existing settlement will be essential, particularly in terms of walking and cycling permeability.

Perton – As recognised in Appendix 5, Perton receives a lower score in terms of public transport accessibility to employment compared to other locations served by rail. In order to minimise vehicle trip generation, new residents will need to rely on improved accessibility to Codsall and Bilbrook rail stations, and high quality and frequent bus services to the conurbation and Shropshire. Local accessibility and integration with the existing settlement will be essential, particularly in terms of walking and cycling permeability. Junction improvements will also be required in Perton where there is likely to be highway capacity concerns particularly at the junction with the A41 and local access onto Wrottesley Park Road.

ROF Featherstone – It is essential that the development site is served by high quality public transport, preferably a new rail station that could provide rail accessibility for new residents and employees and parking facilities that could cater for a rail park and ride facility. The current wording in Appendix 3 (Option G) refers to a 'Park and Ride along the A449' which could incorrectly imply a bus park and ride.

South of Stafford – Public transport accessibility will rely on high quality and frequent bus services to Stafford town centre. Local accessibility and integration with the existing settlement will be essential, particularly in terms of walking and cycling permeability, together with consideration of highway capacity improvements.

#### Infrastructure Delivery Plan 2019

The County Council provided an update on the IDP in August 2019. Since then there has been progress on the delivery of schemes, particularly the rail service

enhancements. When work has progressed on the identification of mitigation measures to support the preferred option, the County Council will feed into an update of the IDP which will also be reflected in an updated version of the South Staffordshire District Integrated Transport Strategy.

Paragraph 5.2 – The wording should clarify the importance of making best use of existing infrastructure and should recognise all forms of sustainable transport, not just public transport.

Paragraph 5.3 – The acknowledgement that making the most of existing infrastructure provision when setting levels of housing growth is supported.

Paragraph 5.10 – Additional parking at Penkridge should also serve the rail station, as well as local retail.

## **Education**

Staffordshire County Council has a statutory duty to ensure that there are sufficient school places to meet the needs of the population. The School Organisation Team (SOT) acts on behalf of the Local Authority to carry out this duty and to ensure that resources are used efficiently.

The district of South Staffordshire is made up of four distinct areas for the purpose of school place planning; 1) Cheslyn Hay & Great Wyrley, 2) Kinver & Wombourne, 3) Codsall & Perton and 4) Penkridge. These areas are broken down into smaller planning areas and are used to plan the number of school places required. These smaller planning areas have been grouped based on the geographical location of schools, and by assessing pupil movement between schools and catchment areas.

A two-tier education system, with Primary (4-11 years) and Secondary (11-18 years) schools, operates in Cheslyn Hay & Great Wyrley and Kinver & Wombourne, whilst in Codsall, Perton and Penkridge, a three-tier system with First (4-9 years), Middle (9-13 years) and High (13-18 years) schools, operates.

Sixth form provision is offered on site at all secondary and high schools within the district.

There are many different options and scenarios being considered as part of South Staffordshire District Council's (SSDC) Local Plan SHSID Consultation. It is noted that the preferred option is to deliver 8,845 houses. This number would influence what additional capacity would be needed and whether this would take the form of expanding existing local schools and/or the provision of new schools.

The Local Plan should help to ensure that there is sufficient education infrastructure available to meet the needs of the homes that are proposed to be delivered in a local area. Where additional capacity is required developer contributions will be necessary to cover the cost of any works. In addition, there may be instances where additional land is required to deliver the requisite places. The Plan should ensure that, where necessary, adequate land is allocated for educational infrastructure when considering areas for development. This maybe land adjacent to existing schools, land within a large proposed development or separate land to cover the cumulative needs of several proposed developments.

To mitigate the preferred dwelling number of 8,845 a total of 1,327 first school places, 1,061 middle school places, 796 high school places and 265 post 16 places are required if all the dwellings were in the three-tier areas. If all the dwellings were in the two-tier areas a total of 1,857 primary school places and 1,327 secondary school places and 265 post 16 places are required. It should be noted that if the developments are spread across the whole SSDC area then a combination of provision would be needed of three-tier and two-tier. This level of detail cannot be provided at this stage, where the location and number of new dwellings in any one location is not known. It is appreciated that the accompanying appendices to the Plan set out indicative levels of growth in each and we have sought to provide some commentary on the locations for growth at the end of this section. We will continue to work with SSDC throughout the site selection process. It should be noted that these numbers do not include additional Nursery provision, additional SEND provision and home to school transport costs. Provided below are some general principles that should be considered in the site selection process when determining scale of growth, location of sites and potential policy considerations.

When considering school sizes these can be referred to in relation to Forms of Entry (FE), which are multiples of 30 relating to class size e.g. a 2FE school would have 2 classes (30 pupils in each) in every year group. It is also possible for schools to operate at half forms of entry i.e. 1.5FE equals 45 children per year group. From an educational perspective some schools and governing bodies believe that teaching children from two age groups in one class (mixed age teaching) is beneficial to the pupils. However, there are many educators who don't believe this is the most appropriate method to organise and teach pupils, as it can present challenges due to the differences in ages and abilities which can affect learning outcomes. As you are aware there is a forever changing outlook on education provision, and more academies are being established through new schools, or maintained schools converting or being sponsored. It is therefore important that the views of schools and governing bodies need to be considered when proposing expansions, or new schools which may require a different class organisation than currently being used or preferred. Currently we believe that any options that require a school to organise into mixed age teaching would not be the preferred option by the majority of schools.

For clarity a development or a cluster of small developments of 750 dwellings may trigger the need for a new first/primary school, 4,000 dwellings for a new middle school, 5000 dwellings for a new high/secondary school. A 0.5FE (15 places per year group) expansion to an existing school would require a development of at least 330 dwellings.

It should be made clear to prospective developers that large residential sites of 750 plus dwellings would be required to provide land for school site(s) in addition to education contributions to mitigate the development. Where cumulatively a number of proposed developments in one area totalled 750+ dwellings land would need to be allocated/safeguarded for education provision and that the developers contribute proportionally to the cost of buying the land, which should be understood and agreed as part of the plan making process.

Any new first schools would need to be at least 1FE (150 places) and would require land of 7,635m<sup>2</sup> to be allocated to facilitate this. To deliver a new 1FE First

(150 places + nursery provision) would cost in the region of £4.6 million pounds. (as at Q3-2019). A 2FE (300 places + nursery provision) would require land of 12,870m<sup>2</sup> to be allocated to facilitate this and would cost in the region of £6.7 million pounds.

Any new primary schools would need to be at least 1FE (210 places) and require land of 11,415m<sup>2</sup> to be allocated to facilitate this. To deliver a new 1FE Primary (210 places+ nursery provision) would cost in the region of £5.2 million pounds. (as at Q3-2019)

Any new secondary schools would need to be at least 5FE (750 places) and require land of 86,076m<sup>2</sup> to be allocated to facilitate this. To deliver a new secondary school of 5FE would cost in the region of £20 million pounds plus.

Where new schools are required the sites would need to be of regular shape, level topography, without significant topographical features that would be considered incongruent with the site's use as a school, free from contamination and other adverse ground conditions, and suitable for the phase of education proposed. Other site requirements will also be required such as (but not exhausted to) drainage and vehicular access and will be detailed and discussed when appropriate.

Where existing schools have insufficient land to expand on their current site consideration may be given to allocating additional land adjacent to the school to facilitate growth if this is achievable. In addition, any new school proposed may also need to have additional land safeguarded to allow for future growth.

As noted above we will continue to work alongside SSDC whilst decisions are made as to where the housing will be located to ensure that there is adequate provision for education infrastructure, which is best found through continued liaison. For areas where there are pressure points consideration would be given for potential expansion of existing school sites and in the more rural areas, we would also look to consider the implications on school transport.

Children in the villages without schools would be entitled to home to school transport where the catchment or nearest school is over two miles walking distance at primary age or three miles at secondary age so there would be additional implications in terms of transport costs, logistics and highway constraints around school sites. This could involve education contributions being sought towards additional school places, transport costs and highway improvements such as crossing points. However, consideration needs to be given before to whether growth in such areas is sustainable as ultimately the public purse will pick up the cost of school transport when any developer subsidy ends.

As the preferred options proposed growth along the border of the West Midlands conurbation there will need to be joint working and agreement with neighbouring authorities on the likely impact on education infrastructure and the possible solutions if required. This should culminate in a Statement of Common Ground between the relevant authorities for the Local Plan examination. We have already begun conversation across the border, which have helpfully included officers from SSDC, we will need to continue this joint approach to working alongside neighbouring Local Authorities to establish the impact of the Local Plan housing in SSDC and their own Housing requirements and the potential impact on cross border pupil movement.



An initial desktop analysis has been completed for all school sites in South Staffordshire in terms of potential expansion within their existing site boundary using the Department for Education Area Guidelines for Mainstream Schools Building Bulletin 103 (2014). This is presented via a RAG (red, amber, Green) rating for expansion potential Green being the highest potential and Red lowest or none.

It should be noted though that an extensive feasibility study & cost analysis would need to be undertaken to determine fully whether a school can be expanded to the size indicated on the desktop analyses, but the desktop analyses provide a useful starting point for considering site allocations and new infrastructure requirements. School Organisation Team comments on the SSDC preferred areas of growth are as follows:

Preferred Areas of Growth: Penkridge, Wheaton Aston & Brewood

Penkridge operates a three-tier system with First (4-9 years), Middle (9-13 years) and High (13-18 years) schools.

Penkridge contains eight first schools, one catholic primary school, two middle schools and one high school which are divided into 2 first school planning areas, 2 middle school planning areas and 1 high school planning area.

St Leonards CE (VC) First School at Dunston is its own planning area.

In addition, The Rural Enterprise Academy operates as a standalone education provider for year 9 – year 11.

Name of School	Education Phase	PAN (Published Admission Number)	RAG rating
St Michael's CE (A) First School, Penkridge	FIR (First)	30	Red
Marshbrook First School	FIR	30	Green
Princefield First School	FIR	45	Green
St John's CE (VC) First School, Bishops Wood	FIR	15	Amber
St Mary & St Chad's CE (VC) First School, Brewood	FIR	30	Red
St Mary's Catholic Primary School, Brewood	PRI (Primary)	15	Green
St Mary's CE First Academy, Wheaton Aston	FIR	25	Green
St Paul's CE (VC) First School, Coven	FIR	30	Red
St Leonard's C of E (C) First School, Dunston	FIR	15	Red
Penkridge Middle School	MID (Middle)	100	Green
Brewood C of E Middle School	MID	120	Red

Wolgarston High School	HIG (High)	220	
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**Summary:**

Penkridge Town has room for some growth at all phases of education subject to proposed numbers of housing.

There is room for growth in Wheaton Aston at primary phase but there is limited room for growth in Brewood. The first school is unable to increase capacity at its existing site, the Catholic Primary can increase but this will complicate education provision in Brewood as the primary school is the only Primary in a two-tier education model, which provides catholic provision to the wider community. The remainder of schools in this area operate a three-tier education model.

Brewood C of E Middle has limited growth available dependent on the proposed number of housing.

Any housing proposed in the rural areas would also require school transport to middle and to high school.

**Preferred Areas of Growth: Codsall, Perton & Pattingham**

Codsall & Perton operate a three-tier system with First (4-9 years), Middle (9-13 years) and High (13-18 years) schools.

Codsall & Perton contains six first schools, one catholic primary school, three middle schools and one high school which are divided into 2 first school, 1 middle school and 1 high school planning area.

Name of school	Education Phase	PAN	RAG rating
St Nicholas CE (VC) First School, Codsall	FIR	60	
Lane Green First School	FIR	30	
Birches First School	FIR	30	
St Christopher's Catholic Primary School	PRI	30	
Perton First School	FIR	60	
Perton Primary Academy	FIR	60	
St Chad's CE (VC) First School, Pattingham	FIR	30	
Codsall Middle School	MID	120	
Perton Middle School	MID	120	
Bilbrook CE(VC) Middle School	MID	50	
Codsall Community High School	HIG	250	

**Summary:**

Codsall First planning area has very limited room for growth and is a priority school place planning area as the schools are currently full. The Plan identifies a potential need for a new 2FE first school. It will be important to ensure that the scale of growth directed to this area is commensurate with the proposed education infrastructure and that any new school is appropriately located. We will need to work collaboratively to ensure all issues are understood and to agree future infrastructure requirements.

Perton First have room for growth subject to proposed numbers of housing.  
There is room available for growth at both middle school and high school phase subject to the proposed number of housing.

Discussions with colleagues in Wolverhampton Local Authority are ongoing as there are a number of children being educated in Codsall from Wolverhampton. Wolverhampton are also reviewing their Local Plan and it is important that cross border school place planning is continued to be considered.  
Any housing proposed in Perton would also require school transport to high school

#### Preferred Areas of Growth: Wombourne, Kinver & Swindon

A two-tier education system, with Primary (4-11 years) and Secondary (11-18 years) schools, operates in Kinver & Wombourne.

Kinver & Wombourne contains eight primary schools plus one infant and one junior school and two high schools which are divided into 2 primary school planning areas and 1 high school planning area.

Name	Education Phase	PAN	RAG rating
Brindley Heath Junior School	JUN	60	
Foley Infant School	INF	60	
Bhylls Acre Primary School	PRI	30	
All Saints CE (VC) Primary School, Trysull	PRI	15	
Corbett CE (VA) Primary School, Bobbington	PRI	14	
St Benedict Biscop CE Primary School	PRI	30	
St Bernadette's Catholic Primary School, Wombourne	PRI	15	
Blakeley Heath Primary School	PRI	50	
Westfield Community Primary School	PRI	60	
St John's CE (VC) Primary School, Swindon	PRI	15	
Kinver High School and Sixth Form	HIG	120	
Wombourne High	HIG	192	

#### Summary:

There is room for growth at most of the primary schools in Kinver and Wombourne subject to the proposed number of housing. It should be noted that in the area of Foley Infants and Brindley Heath Juniors both schools would need to be expanded as the schools cover one primary phase.

There is room for growth at Kinver High School, but further investigation would be needed to ascertain if Wombourne High School could grow subject to proposed number of housing.

Discussions with colleagues in Dudley Local Authority need to commence as there are a number of children being educated in Kinver and Wombourne from Dudley. Dudley are also reviewing their Local Plan and it is important that cross border school place planning is considered.

Some areas in Kinver and Wombourne High School catchments would also require school transport to high school

Areas of search Urban extension: Essington, ROF, Dunston, edge of Wolverhampton from Perton, through Kinver to Wombourne.

Cheslyn Hay and Great Wyrley- Essington and ROF

Cheslyn Hay & Great Wyrley contains eight primary schools and two high schools which are divided into 2 primary school planning areas and 1 high school planning area.

Name of school	Education Phase	PAN	RAG rating
Glenthorne Community Primary School	PRI	45	
Cheslyn Hay Primary School	PRI	60	
Landywood Primary School	PRI	60	
Moat Hall Primary	PRI	60	
St Thomas More Catholic Primary School	PRI	25	
St John's Primary Academy, Essington	PRI	60	
Featherstone Academy	PRI	30	
Haverгал CE Primary Academy	PRI	30	
Cheslyn Hay Academy	HIG	224	
Great Wyrley Academy	HIG	195	

Summary:

St Leonards CE (VC) First School at Dunston is its own planning area and is unable to expand using its current capacity. (Noted in table as this is part of the Penkridge Town First School Place Planning Area)

St John's Primary Academy, Essington and Featherstone Academy are currently full, but both have room for growth subject to the proposed number of housing.

There is limited growth available at Cheslyn Hay Academy and Great Wyrley Academy dependent on the proposed number of housing.

Discussions with colleagues in Wolverhampton and Walsall Local Authorities are ongoing as there are a number of children being educated in the Cheslyn Hay and Great Wyrley School Place Planning Areas from Wolverhampton and Walsall. Wolverhampton and Walsall are also reviewing their Local Plan and it is important that cross border school place planning continues to be considered.

New settlement Area of search –Dunston and Penkridge to Wolverhampton (A449 corridor)

The Spatial Housing Options has identified an area of search for a new settlement of circa 10,000 dwellings, along the A449 corridor between Dunston and Gailey, due to existing good transport links.

A new settlement of this size would need its own education infrastructure across all phases. It would also allow for the locations of the new schools to be carefully considered and planned to give greater opportunity for children to walk, cycle to school whilst encouraging families to be healthy and independent. In addition, through careful master planning of street layout, pedestrian routes and other facilities/amenities around the school etc it should be possible to design out issues

that present at start/end of the school day at existing schools across the country. We would welcome the opportunity to work with SSDC to develop education infrastructure ideas for a new settlement.

## Landscape

From a landscape perspective we support the approach to and content of the evidence base for the South Staffordshire local plan review - and have reviewed the following documents in order to make strategic landscape comments:

- Local Plan Spatial Housing Strategy and Infrastructure Delivery Oct. 2019 and Executive Summary
- Green Belt Study Stage 1 & 2 report July 2019
- Landscape Sensitivity Assessment July 2019
- Landscape Sensitivity Assessment Appendix 1
- Appendix 5 Policy and Physical Constraints
- Appendix 6 Site Selection Method

We agree in principle that the preferred option G has the potential to satisfy the strategic housing needs whilst minimising harm to landscape character, the green belt and designated historic landscapes.

Where relevant, the policies of the National Planning Policy Framework 2019 (NPPF) should inform the preparation of the Preferred Option. In particular, regard should be paid to:

- first considering the release of Green Belt which is *previously developed or well-served by public transport* (138)
- considering the *implications for sustainable development for channelling development* past the Green Belt (138)
- supporting *housing developments that reflect local needs* (77)
- locating housing *where it will enhance or maintain the vitality of rural communities. allowing villages to grow and thrive, especially where this will support local services* (78)
- *focusing significant development on locations which are or can be made sustainable through limiting the need to travel and offering a genuine choice of transport modes*, whilst recognising that sustainable transport solutions will vary between urban and rural areas (103)
- *directing growth towards areas with the least environmental or amenity value* (171)

Proposals should take into account, and avoid detrimental effects on, landscape and historic character including key characteristics, local distinctiveness, visual amenity, key views and tranquillity. The cumulative impact of development proposals on landscape character should be considered. Opportunities should be taken to enhance landscape character where possible and should be read in conjunction with the Green Infrastructure and other Natural Environment policies to achieve this.

In relation to the locally distinctive raised, domed landform of Cannock Chase Area of Outstanding Natural Beauty (CCAONB), we feel that more emphasis should be placed on the impact of development on views to and views from the AONB as highlighted in the CCAONB 2019 Management Plan (Policy LCP8 and Associated

Action A15) as the plan progresses. The two areas particularly affected by this Policy are the M6/ A449 corridor between Penkridge and Stafford, and the possible urban extension to the south of Stafford.

We concur with the summary conclusions of the Landscape Sensitivity Study and have reproduced extracts from the report below in italics to give them more emphasis as part of our consultation response.

*Areas within South Staffordshire located alongside the West Midlands conurbation (Dudley, Wolverhampton and Walsall) often have a lower sensitivity to development than the rural villages within the district, due to the urbanising influences of the adjacent conurbation. Generally, the visual influence of adjacent development and infrastructure extending from the urban area, as well as development beyond the settlement edge, semi-rural land uses, and the consequent erosion of field patterns, landscape features and loss of strong rural perceptual qualities, all combine to lower landscape sensitivity to further development.*

However, the sensitivity of these landscapes are sometimes increased due to their role in providing a perceived gap and preventing coalescence between the wider conurbation and individual villages such as Wombourne, Perton, Codsall or between different settlements within the conurbation such as Penn and Sedgley.

*Many areas, particularly along the northern settlement edge of Wolverhampton are also located in close proximity to major transport corridors, particularly those along the M54 between its junctions with the A449, A460 and the M6 or to the south of Cannock along the M6/M6 Toll and are often of the lowest sensitivity. These areas are often degraded both physically and perceptually, with little public access and limited natural features or are influenced by their proximity to large scale modern development typically found near major road junctions.*

This conclusion should emphasise the potential impact of new or improved road infrastructure such as the M6- M54 link road currently in preparation.

*The influence of adjacent historic landscapes and areas with a strong time-depth can increase sensitivity to development such as the areas west of Dudley adjacent to Himley Hall Registered Park and Garden the designed parkland at Wrottesley Hall, the historic parkland between Oaken and Codsall or the many areas with intact small scale historic field patterns.*

The Spatial Strategy should make more reference to the context and setting of such historic landscapes and views to and from the parklands.

*The landscape areas north of the M54, in the corridor between the M6 and the A449 are often of lower sensitivity due to the impact of modern infrastructure, including the motorways and busy trunk roads, the prevalence of prominent power lines, industrial estates and on-going mineral extraction. This is particularly apparent north and south of the busy A5 where the landscape contains areas of strongly contrasting character with large scale industry neighbouring small scale mixed farming and further north adjacent to J13 of the M6 near Dunston.*

However, sensitivity increases rapidly away from the motorway corridor, due to the intact rural character, particularly where the landscape to the west of the motorway

is separated by the north-south running railway line or to the east on the elevated landscape at Acton Hill.

*Landscapes adjoining the rural South Staffordshire villages generally have the highest sensitivity to development, due to their strong sense of rural character, tranquillity and lack of larger scale modern development. The Conservation Areas of these historic settlements often extend into the surrounding countryside, and development in these areas would adversely affect the settlement edge. The historic cores of these villages are often positioned along river corridors, or in hilltop positions where the surrounding countryside provides a distinctive element in views that are key to the character of the settlement.*

Areas within the Cannock Chase AONB are of higher sensitivity, due to their natural and recreational character and consideration of the impact of development on the special qualities of the landscape as part of a nationally designated landscape.

Landscape Sensitivity Criteria selection was based on *the attributes of the landscape most likely to be affected by development and considered both 'landscape' and 'visual' aspects of sensitivity.* The criteria used were:

- *Scale (the scale of the landscape);*
- *Landform (the topographical complexity of the landscape);*
- *Landscape pattern and time depth (the complexity of landscape pattern and the extent to which the landscape has 'time depth' – a sense of being a historic landscape);*
- *Natural character (the presence of natural or semi-natural features that are important to landscape character);*
- *Built character (the extent that built character contributes to landscape character);*
- *Recreational value (the value of the area for recreation in which experience of the landscape is important);*
- *Perceptual aspects (qualities such as rurality, traditional land uses with few modern, human influences, sense of remoteness or tranquillity);*
- *Settlement setting (the extent to which the area relates or contributes to the form and pattern of existing adjacent settlement, and the character of the adjacent settlement edge);*
- *Visual prominence (visual prominence of the area and the character of skylines); and*
- *Inter-visibility (the degree of inter-visibility with surrounding designated landscapes and the role the area plays in contributing to valued views).*

In each Landscape Character Area within the District, the relative significance of the above criteria should be ranked according to their different key characteristics and the Study should acknowledge this in some way.

It is considered that the following evidence would be of use in taking the Plan forward:

- **Green Infrastructure Report:** Some areas along the urban conurbation edges could make a significant contribution to the identity of the adjacent settlement edge. New, well planned landscape features could provide valuable boundary features separating urban areas from the surrounding countryside, such as strong woodland belts. The Spatial Strategy could include an innovative Green

Infrastructure Evidence report which could investigate the feasibility of such a strategy to be undertaken hand in hand with site selection options on a strategic level. Such a report could take an overarching view on climate change, habitat loss and replacement over the whole District. The precedent for this approach is the Forest of Mercia and National Forest. Large scale woodland creation could be seen in the context of the wealth of historic designed parklands throughout South Staffordshire.

- Topography: A strategic topographical analysis of the Green Belt may assist in refining the Spatial Strategy and it could be readily undertaken as a digital terrain model or series of models highlighting for example the areas of significant visual impact in relation to the existing urban edge and or other key historic landscape features.
- Dark Skies evidence: A strategic review of Dark Skies in the district may assist in refining the potential harm to Green Belt and open countryside in less disturbed areas. There is an existing dark skies database undertaken by Land Use Consultants on behalf of CPRE.

## Ecology

In the Policy and Physical Constraints paper sections 5.20 -5.23 are welcomed. Regarding 5.22 biodiversity opportunity areas while these remain helpful in terms of characterising biodiversity priorities in the District, they are somewhat outdated. We are aware that SSDC is hoping to work with partners to refine this approach in line with other districts; this would form an important part of the Local Plan evidence base.

There is no mention of locally designated sites - these include Local Wildlife Sites and Biodiversity Alert Sites. The conclusions (p34) refer to nationally and internationally designated sites. Those nearby but across boundaries in Shropshire and the West Midlands should also be included in the evidence base (for example Fenns Pool, Dudley)

In Appendix 6 – Section 8 ‘Other known Site Constraints’ refers to designated and non-designated wildlife sites. It is noted that the natural environment is not considered in a separate section which could be interpreted that the natural environment is not considered as important, or as much of a constraint, as historic environment or landscape sensitivity. Natural habitats such as woodlands, open water and populations of species should be considered important. Similarly, this section does not mention geological or geomorphological sites or features.

Irreplaceable habitats include Ancient Woodland and veteran trees, which are referenced in NPPF 175 (c). They may also include other habitats such as species-rich grassland with a strong history of management. Where veteran trees are concerned, the setting, nearby trees of future veteran status, and how management of the trees will be secured should also be considered.

For all natural environmental considerations, the mitigation hierarchy should be applied (NPPF 175 (a) refers:

*When determining planning applications, local planning authorities should apply the following principles:*

*a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts),*



*adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*

Although this reference is to planning permission, rather than strategic processes, it would be illogical to not apply this principle at an early stage, thus avoiding conflicts later. The hierarchy is now enshrined in best practice and is a keystone of the move towards mandatory net gain for biodiversity.

## **Archaeology / Historic Environment**

It is welcomed that South Staffordshire Council has acknowledged (section 3.6) that historic environment constraints, such as Conservation Areas may constrain the level of growth in an area and that it may be appropriate to consider a lesser amount of growth in some locations. This is particularly pertinent given that the District Council's preferred Spatial Housing Option (Option G) will result in settlement growth in some of the district's historic rural villages, which comprise or are in the vicinity of a number of historic environment constraints such as designated heritage assets such as conservation areas, listed buildings, scheduled monuments, and registered parks and gardens. Furthermore, it is noted that the District Council specifically identifies such growth in the Penkridge area (a historic settlement with conservation area) as a disadvantage of the preferred option. Ensuring that the process of selecting sites that minimise the impact on the special historic character of Penkridge and other historic settlements in the District will be key, and, as the District Council have outlined (Appendix 6), a robust and consistent methodology for doing this is required.

The key criteria for the identification of sites, in terms of the Historic Environment/Archaeology, appears to be comprehensive in nature and there seems to be a good outline understanding of the historic environment and heritage sensitivities (informed by the Historic Environment Character Assessments and Extensive Urban Surveys) of the district's historic villages and proposed urban extension areas (Appendix 5 provides a useful summary of the key designated heritage assets in these areas). In terms of the methodology proposed for assessing the impact on the historic environment as part of the site selection process (Appendix 6), what is proposed is supported, and it is welcomed that this will be carried out with full regard to relevant Historic England guidance. Staffordshire County Council's Historic Environment Team have had an opportunity to review and comment on the proposed assessment methodology and, in general, are supportive of the proposed approach, however we would strongly recommend that Historic England's recent comments and suggested amendments, which largely focus on the setting and significance of heritage assets, are reflected in the final methodology.

## **Rights of Way**

We welcome the inclusion of footpaths as part of the Design Principles set out in the SPD and the suggestions that footpaths and bridleways should be considered as a necessity to link public areas; as enhancements to the setting of developments; and as key connections between urban and rural areas.

We have recently published the 4th Review of the Definitive Map and Statement for South Staffordshire and the District Council have been provided with copies of the maps and Statement to indicate the alignment of all recorded routes. We expect

this to be used as evidence in planning sites to ensure that all public rights of way are protected and, where possible, enhanced in conjunction with any development.

At this stage in the Plan making process it is too early to consider specific paths. However, there are also a number of historic paths in some of the areas proposed for growth, including the Monarch's Way and these should be retained on their original lines where possible.

## **Flood Risk**

At this stage in the preparation of the Local Plan there is not much to add from a Flood Risk perspective. We would expect more involvement when it comes to assessment of specific sites. However, the Spatial Housing Strategy – 3.6 Environmental Constraints, could add 'Flood Zone 3 and areas at risk from surface water flooding'. In addition, Appendix 6 – Section 9 Other Site-Specific Opportunities' could add 'opportunities to reduce existing flood risk where development allows'.

## **Adult Social Care**

In relation Affordable housing and housing mix SPD references to specialist housing for older people could be extended to include the housing needs of people with disabilities and limited mobility. We support the approach of offering certain amounts of affordable housing to these groups which recognises that social housing needs may change as people move through the different age brackets.

With regards to paragraphs 14.2 and 14.3 when determining housing options for older people and people with disabilities, consideration should be given to mechanisms other than single story dwellings (which usually increase land use) which are accessible and meet peoples' needs. Other housing offers which could meet the needs of older or disabled people and enable them to age in place include lifetime housing in appropriately adapted or adaptable property which does not need to be single storey, for instance in adaptable accommodation a lift would give access to other floors.

On the Rural services audit document, sections 3.6 and 3.13, the acceptable walking distance for older, frail people and the mobility impaired is much lower (we use a return walking distance of 360m when we consider accessibility of services) so the impact on this group will be much greater and should be borne in mind when considering accessibility to services and amenities.

## **Minerals and Waste**

We have reviewed the consultation documents with a view to assessing consistency with the mineral safeguarding policies within the Minerals Local Plan (Policy 3) and the NPPF (Chapter 17, esp. Para. 204(c)). Given the strategic nature of the alternatives under consideration, there are no specific comments to make now. It is, however, important to note that mineral safeguarding should be considered at some point in the Plan development process. There is a recent guide produced by the Mineral Products Association and the Planning Officers' Society which advises on how this can best be achieved -

[https://mineralproducts.org/documents/MPA\\_POS\\_Minerals\\_Safeguarding\\_Guidance\\_Document.pdf](https://mineralproducts.org/documents/MPA_POS_Minerals_Safeguarding_Guidance_Document.pdf) .

Much of South Staffordshire falls within a Mineral Safeguarding Area (MSA), and whilst this should be recognised in the emerging Plan as a constraint, it would not be appropriate to eliminate all such land from consideration for development. Most of the MSAs relate to sand and gravel (Superficial Sand and Gravel or Bedrock Sand), and the widespread nature of the resource, both within the District and beyond, means that the loss of some areas is unlikely to be significant.

The situation for Brick Clay, however, is rather different. Etruria Marl is a nationally scarce resource, which is essential to support brick and tile production in the region. The MSA occupies a relatively small area to the south of Cheslyn Hay, so the emerging Plan should take care to avoid the sterilisation of this resource.

It is noted that the various options under consideration do vary in the amount of development they plan to direct towards the area south of Cheslyn Hay, so it might be reasonable to assume that those that direct less development in this area would most easily be able to avoid sterilisation of clay resources. The preferred option does not appear to be among the options which direct less development into this area.

The Minerals Planning Team will be happy to provide ongoing advice and support to South Staffordshire as the Plan evolves.

Yours sincerely

**James Chadwick**  
**Planning Policy Officer**

**Enc. – Consultation Questions**

**Question 1: Do you agree that the evidence base used to inform Spatial Housing Options is robust and proportionate? If not, what else should we consider?**

The evidence base broadly covers the main areas that are to be expected for the Housing Options at this stage in the process.

Further data on Green Infrastructure may be required. Some areas along the urban conurbation edges could make a significant contribution to the identity of the adjacent settlement edge. New, well planned landscape features could provide valuable boundary features separating urban areas from the surrounding countryside, such as strong woodland belts. Such data could assist site selection options and policy formation on a strategic level.

A strategic topographical analysis of the Green Belt may assist in refining the Spatial Strategy and it could be readily undertaken as a digital terrain model or series of models highlighting for example the areas of significant visual impact in relation to the existing urban edge and or other key historic landscape features.

A strategic review of Dark Skies in the district may assist in refining the potential harm to Green Belt and open countryside in less disturbed areas. There is an existing dark skies database undertaken by Land Use Consultants on behalf of CPRE.

Regarding 5.22 biodiversity opportunity areas – these remain helpful in terms of characterising biodiversity priorities in the District but are somewhat outdated. We are aware that SSDC is hoping to work with partners to refine this approach in line with other districts; this would form an important part of the Local Plan evidence base moving forward.

There is no mention of locally designated sites - these include Local Wildlife Sites and Biodiversity Alert Sites.

The conclusions (p34) refer to nationally and internationally designated sites. Those nearby but across boundaries in Shropshire and the West Midlands should also be included in the evidence base (for example Fenns Pool, Dudley)

**Question 2: Do you agree that taking account of housing land supply from the start of the new plan period (1 April 2018) is the correct approach?**

As there is potential for some of this supply to be delivered ahead of adoption of the Plan this approach is acceptable.

**Question 3: Do you agree that all Safeguarded Land identified in the SAD should be released as a priority and should be delivered at an average density of 35 dwelling per hectare?**

Where Safeguarded Land aligns with the preferred option it should be released. A blanket approach to density may not provide for design and housing types that reflect the location and local needs. A refined site by site approach would perhaps be more applicable

**Question 4: Are there any other options we should consider?**

**Question 5: Do you agree that the 7 Spatial Housing Options set out above are appropriate options to consider? Are there any alternative options we have not considered?**

Whilst there is a level of duplication across some of the 7 options, they are considered appropriate.

**Question 6: Do you agree that Spatial Housing Option G is a robust approach to meet needs in the district and to make a contribution towards unmet needs in the GBHMA?**

In the absence of strategic agreement across the HMA on how to allocate the unmet needs Option G is considered appropriate.

**Question 7: Do you agree that we should continue to explore options for a new settlement?**

Yes, we would be keen to explore this with you in detail.

**Question 8: What other information (if any) should we consider before concluding that Green Belt release is justified?**

Given the level of Green Belt coverage in the District and the housing needs the information included to date and proposed is considered appropriate for Plan making.

**Question 9: Have we identified the key criteria for the identification of sites (as set out in Appendix 6)? Are there any other factors we should consider?**

The site selection criteria in Appendix 6 broadly covers the relevant areas. In relation to section 4 the NPPF sets out at paragraph 138 criteria for consideration of greenbelt boundaries where it has been concluded necessary to release green belt. In this it refers to previously developed land and/or areas well served by public transport. On the latter point around public transport it may be useful for Appendix 6 to provide some further clarity. It may be useful to qualify what 'well served' means for example villages with train stations should be considered to be better served by public transport than those without. It may be the case that a particular Green Belt location is not currently well served by public transport simply because there is not enough there to serve. However, the development of an area may facilitate the provision of public transport where it previously was poor or didn't exist.

In Section 8 'Other known Site Constraints' refers to designated and non-designated wildlife sites. It is noted that the natural environment is not considered in a separate section which could be interpreted as the natural environment is not considered as important, or as much of a constraint, as historic environment or landscape sensitivity. Natural habitats such as woodlands, open water and populations of species should be considered important. Similarly, this section does not mention geological or geomorphological sites or features.

**Question 10: Do you agree that, when selecting sites to deliver the preferred spatial housing strategy, the Council should seek to avoid allocating housing sites that would result in very high Green Belt harm wherever possible?**

This approach is acceptable as it allows sensible consideration of all potential sites against the objectives of the strategy and doesn't impose a blanket restriction that may result in less effective delivery of objectives.



Local Plans Team  
South Staffordshire Council  
Council Offices  
Wolverhampton Road  
Codsall  
South Staffordshire  
WV8 IPX

Date 13 December 2021

Via Email only

## **Re: Local Plan Review – Preferred Options**

Dear Kelly

Thank you for consulting Staffordshire County Council (SCC) on your Local Plan Review Preferred Options Consultation. It is clear from the evolution of the Plan that advice and recommendations given by SCC in previous rounds of consultation and during our regular meetings have been taken on board.

It is acknowledged that sections 1.8 to 1.10 set out the significance of Climate Change for the Local Plan and that climate change measures will be a consistent thread that will run through the plan. However, the Vision for the Plan makes no reference to Climate Change. Given the significance should the Vision also include reference to Climate change mitigation and adaptation.

The Issues and Challenges to be considered by the Plan are well covered and the Strategic Objectives are supported.

It is acknowledged that the Plan makes a significant contribution towards the wider Greater Birmingham Housing Market Area (GBHMA) needs. Early consideration of this has allowed us to assess the associated infrastructure requirements for the planned growth.

The Longer Term Growth Aspirations for a New Settlement will allow for consideration of accommodating further unmet housing need in a Planned manner and informed by the likely infrastructure requirements. In considering the area of search set out in Appendix F it is considered that limiting the search to an independent/freestanding new settlement may limit options. It is therefore suggested that Policy DC4 should also provide for consideration of expanded settlements within the area of search following the same criteria as a new settlement.

## Transport

We have the following comments to make from a Transport Planning perspective.

Pp 15 Question 1 Do you agree that the evidence base set out in Appendix A is appropriate to inform the new Local Plan ?

From a transport perspective, the following documents should be considered for inclusion within the evidence base:

1. South Staffordshire District Integrated Transport Strategy, rather than the Staffordshire Local Transport Plan 2011. The District Integrated Transport Strategy will be updated to reflect the emerging Publication Plan and will inform the next revision to the Infrastructure Delivery Plan.
2. Brinsford Parkway Station Strategic Outline Business Case
3. Staffordshire Freight Strategy 2019
4. Transport Impacts (with Staffordshire County Council) 2022 – Note that this document has yet to be completed and published. It will contain transport modelling assessments relating to the impacts of sites covered by policies SA1-SA4, accessibility mapping and connectivity proposals for sites within SA1-SA5.

PP 17 Question 1 b) The South Staffordshire District Integrated Transport Strategy will be updated to reflect the emerging Publication Plan and will inform the next revision to the Infrastructure Delivery Plan.

Pp25 Question 3 a) Yes, but Table 4 could include a reference to the support for new rail-based parkway at Brinsford and this should be echoed in Strategic

Pp 29 Housing

Pp 31 para 4.16 talks about *'limiting new (housing) allocations at Perton to the existing safeguarded land reflecting the lack of a finalised junction improvement scheme at the A41 and the remoteness of Greenbelt Site options from education facilities'*

SCC has undertaken work that demonstrates that additional housing could be accommodated by implementing an identified improvement scheme at the A41/Wrotesley Park Junction. Furthermore, there are options to improve connectivity / provide transport that could make development acceptable from a school transport perspective.

Pp 46 Policy DS3 – The Spatial Strategy

SCC has assisted SSDC by providing the transport evidence to support its Spatial Strategy to 2038, providing high level transport modelling, accessibility and connectivity advice. This will help in identifying and addressing infrastructure issues from housing development with cumulative and cross boundary impacts. SCC supports the provision of a rail-based parkway at land at Cross Green development and is working in partnership with City of Wolverhampton Council and SSDC to assist with delivery. Similarly, SCC have helped with the development of several of the district's freestanding employment sites (e.g. I54, ROF Featherstone Brinsford and Four Ashes)



and following the WMI decision, support their continued development, subject to appropriate mitigation where necessary.

Pp 49 Policy DS4 – Longer Term Growth Aspirations for a New Settlement  
Policy DS4 Question 6.

The wording should mention that a range of technical studies will need to be undertaken to justify the proposal and evidence how the new settlement will be delivered in a way that achieves the objectives.

Pp 51 Site Allocations  
Housing

For this consultation response, SCC is providing detailed transport comments and observations on each of the four proposed strategic housing allocations included within Policies SA1-SA4 and the smaller housing sites included within Policy SA5. These comments derive from technical work undertaken in partnership with SSDC to help inform plan-making.

SCC commentary covers the following themes:

- Site accessibility
- Connectivity (active modes – walking and cycling and public transport)
- Potential highway Impact

#### Site accessibility

TRACC analysis has been undertaken by SCC to help identify the most sustainable locations across South Staffordshire and provide a basis for establishing the relative sustainability of settlements based on existing service provision.

TRACC calculates journey times based upon public transport timetable data, road network information and a range of user-defined parameters.

The following calculations have been undertaken:

- PT Access to Employment AM Peak 07:30 to 09:30
- PT Access to Hospitals Wed 08:00 to 10:00
- Bus Access to Supermarkets Wed 10:00 to 13:00
- Bus Access to Supermarkets Sat 10:00 to 13:00
- Walk Access to Middle Schools
- Walk Access to Primary & First Schools
- Walk Access to GP Surgeries

A maximum journey time threshold of 60 minutes was set for the PT and Bus calculations. This includes the initial walk time to the stop, and interchange time plus the final walk from the stop to the destination. The software computes a journey time for every 10-minute interval within the defined time period to the nearest destination point and the shortest journey times are returned. Therefore, the accessibility contour maps represent the best journey time that can be achieved within the defined time period. This is via the road and footpath network, so better simulates an actual journey rather than just a straight line distance from origin to first stop or from the final stop to the destination point. The maximum walk distance to access a public transport stop has been set at 350m.

The bus timetables used are the most up to date including known service changes at the time of calculation (valid to September 2021) but also reflecting the likely provision to key employment sites such as West Midlands Rail Freight Interchange as per the S106 requirements for these sites.

The rail timetable used is valid from January 2020 so prior to the Covid pandemic. The rail services have changed so frequently over the past 18 months it is not possible to know if the service level at present will continue or whether services will increase back to previous levels. Service levels at Landywood and Penkridge stations are at present roughly the same as they were in terms of frequency back in 2020, but at Codsall and Bilbrook stations the frequency is still reduced compared to January 2020 service levels.

The proposed development site plans were geo-referenced in ArcGIS to provide an indicative site layout which was loaded into TRACC to provide a road/footpath layout allowing the demonstration of accessibility where applicable.

For the access to employment calculation, a revised methodology has been used for some of the job numbers, particularly the job totals in town centres where revised numbers have been provided where known from data supplied by the Economic Development team.

Extra locations such as hospitals have been included as destinations in their own right. Where available, job numbers provided by hospital trusts have been used, or splits between hospital sites used where we have information provided directly by the trust. Where hospital trusts operate more than one site (such as New Cross and Cannock Chase Hospitals) and staff numbers cannot be split, a proportion has been used based on the split supplied for County Hospital in Stafford and Royal Stoke University Hospital.

Other locations which could be accessed via the Midland Metro from Wolverhampton such as West Bromwich, Bilston and Wednesbury have also been included. Job numbers for these towns have been sourced via the Black Country Consortium at MSOA level for each town. These provide additional centres where residents of South Staffordshire could be employed and are able to reach within a journey time of 60 minutes.

For some destination types, such as employment, it is not appropriate to calculate accessibility to the nearest destination point; as the nearest point of employment may not be suitable i.e. lack of job choice. For employment destinations a Hansen score was calculated. This combines the number of destinations that can be accessed within a 60-minute journey time with the disbenefits of travel in terms of journey time and the total number of jobs available at the destination. The higher the score, the greater the level of access and choice. Due to the change in job figures, the data is displayed in six bands rather than quartiles as done previously, to help distinguish the difference in access to the range and number of jobs.

For the supermarket calculations, a review of the destinations used in the previous calculation was done and certain supermarkets have been removed and others added in. This has been done to reflect the change over the previous 18 months due to the

Covid pandemic how people have changed their food shopping habits. Some smaller branches of the Co-op have been included where they might not have been previously.

It is not possible to confirm the pedestrian facilities available on each road and in rural areas it is likely that some walking routes particularly between settlements would not be considered safe for pedestrians and children in particular.

For primary school accessibility calculations; it is more appropriate to calculate accessibility on foot as children who live beyond 2 miles to their nearest primary school are entitled to free transport. This calculation uses the road network and applies an average walk speed of 4.8kph.

Accessibility assessments are presented as a separate enclosure and allow a comparison of the merits of each location, to inform later work should the site(s) be allocated within the plan.

### Connectivity

Cycling and walking routes are an important element of any new housing development to help avoid over reliance on journeys by car, particularly for shorter trips. It is important that the proposed Preferred Option developments within South Staffordshire's Local Plan provide good well-planned walking and cycling routes to key attractions within settlements such as schools, village centres and public transport hubs. In addition, it is important that new developments create pleasant environments for their residents to live in and the provision of nearby attractive leisure routes can help facilitate this. Any new facilities should, where possible, be designed to LTN1/20 standards although the use of lightly trafficked and low speed roads can be acceptable.

Recommended walking and cycling proposals are presented in the enclosed plans to help make the identified sites acceptable from a connectivity standpoint. These have been informed by site inspections (personal and remote), GIS analysis and professional opinion.

Public transport provision is also very important to ensure all residents have access to services and alternatives to private car travel. In some areas it will also be vital to ensuring children can get to their allocated schools.

### Highway Impact (Strategic Housing Site Assessments)

In order to assess the high-level traffic impacts of the large strategic housing sites included within Policies SA1 – SA4, SCC acquired National Highways' (NH), formerly Highways England, SATURN traffic model. This was recently updated to inform their bid for funding for the M54-M6 link and inform scheme design. SCC has further updated this model to include the proposed development at the four strategic housing sites; specifically, **1,329** new homes (including **200** already consented) to the north of Penkridge; **1,200** at Cross Green; **1,200** at Linthouse Lane; and **848** at Bilbrook together with **317** planned for Codsall, making a total of **1,165**. In addition, the proposal for Brinsford Parkway railway station (with around 500 car park spaces) was included in the model, given its close links with the strategic housing site at Cross Green.

In order to represent each development in the model, an existing trip distribution from similar adjacent zones was replicated and factored by the number of peak hour development trips that each development is likely to generate. This trip rate was derived from recent extensive surveys and Transport Assessments in various areas of South Staffordshire, namely Perton (2 no.), Penkridge and Cheslyn Hay. This was considered to provide a representative trip rate for these large strategic site proposals. To put this into perspective, it would be expected that for every 1000 new houses built there would be around 450 to 500 new trips on the road network. Trip distribution and rates for the Parkway Station car park at Brinsford were estimated with the help of data within the Strategic Outline Business Case which has been prepared to demonstrate the need for a station in this area.

It is important to understand the history of the SATURN model and its potential limitations, none of which are considered to affect its appropriateness for the purposes of this exercise which is to provide an overview of highway impacts to determine if there are likely to be any insurmountable problems should the development sites come forward. The original SATURN model is the Midlands Regional Transport Model (MRTM), which was then partially updated to support the bid for funding for the M54-M6 Link Road. SCC were provided with a cordoned version of this model, covering the South Staffordshire and Wolverhampton areas. Due to its strategic nature, some of the network coding is coarse, with some generalisation of the local road network. For example, only one route through Penkridge village, accessed via the A449, is included where there are actually a few route options. In reality, any vehicles on this route are likely to be split over the available routes.

In order to provide cumulative and individual assessments of the likely traffic impacts from all four strategic housing locations across Staffordshire's road network, the updated SATURN model has been interrogated to determine where the introduction of the proposed developments cause a change in traffic of more than 100 2-way trips in the modelled peak hours (0800-0900 hours and 1700-1800 hours). SCC has also provided model results to the City of Wolverhampton Council (CWC) for them to understand the impacts on their network. It is important to note that changes to traffic levels do not only occur due to the proposed development trips loading onto the network; existing trips also re-route as the new trips are accommodated. For example, some existing trips on the A449 (north of Penkridge) appear to switch to the M6 as the A449 becomes more heavily trafficked with 1,329 new homes accessing directly onto it.

#### Cumulative Assessment of the Highway Impact of the Proposed Strategic Housing Sites

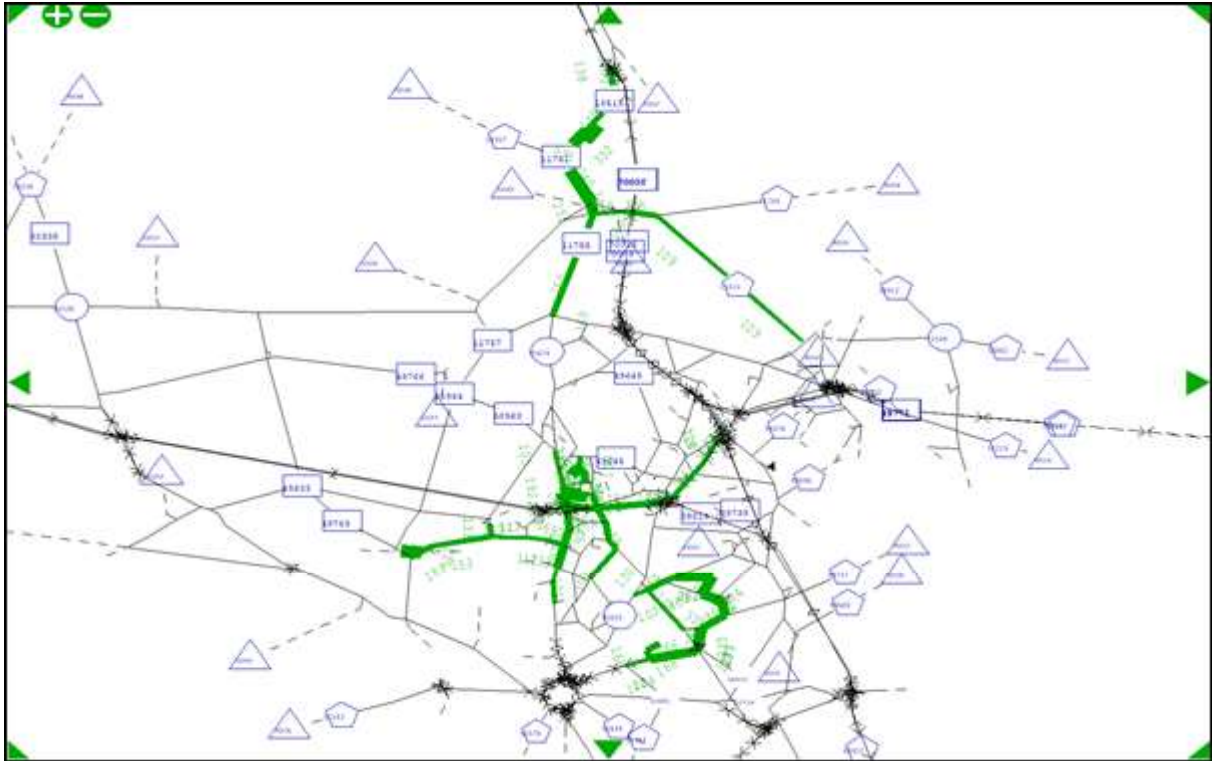
SCC has applied the updated model to provide an overview assessment of the cumulative impact of the four strategic housing sites (1,329 new homes, including the 200 already consented, to the north of Penkridge; 1,200 at Cross Green (plus the 500 space Parkway railway station); 1,200 at Linthouse Lane; and 1,165 in Codsall and Bilbrook.

The cumulative assessment shows there are reasonably consistent effects across both the AM and PM peaks. On the whole, changes in traffic levels greater than 100 trips occur in reasonably close proximity to each of the proposed developments, with less impact further away as vehicles disperse through the network. Screenshots from the

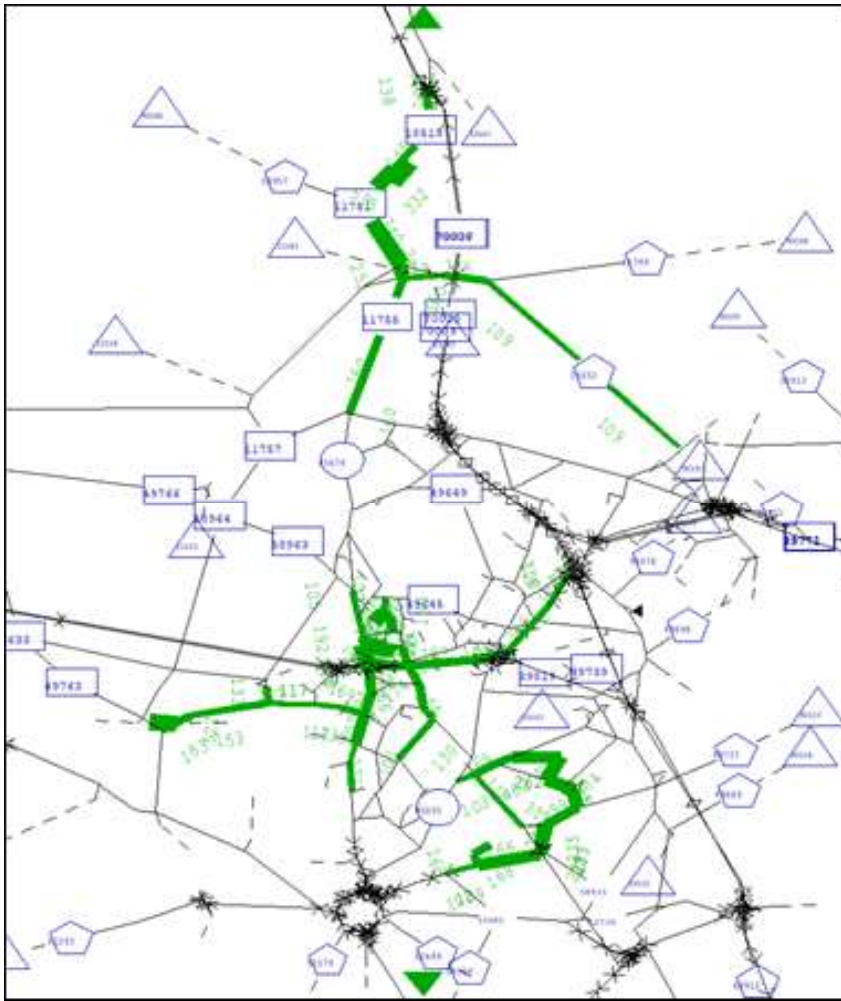
model shown below demonstrate this, highlighting the changes in traffic near to Penkridge, Codsall/Bilbrook, Brinsford and Linthouse Lane:

Screenshots Showing Changes in Peak Hour Traffic Levels Along Impacted Routes

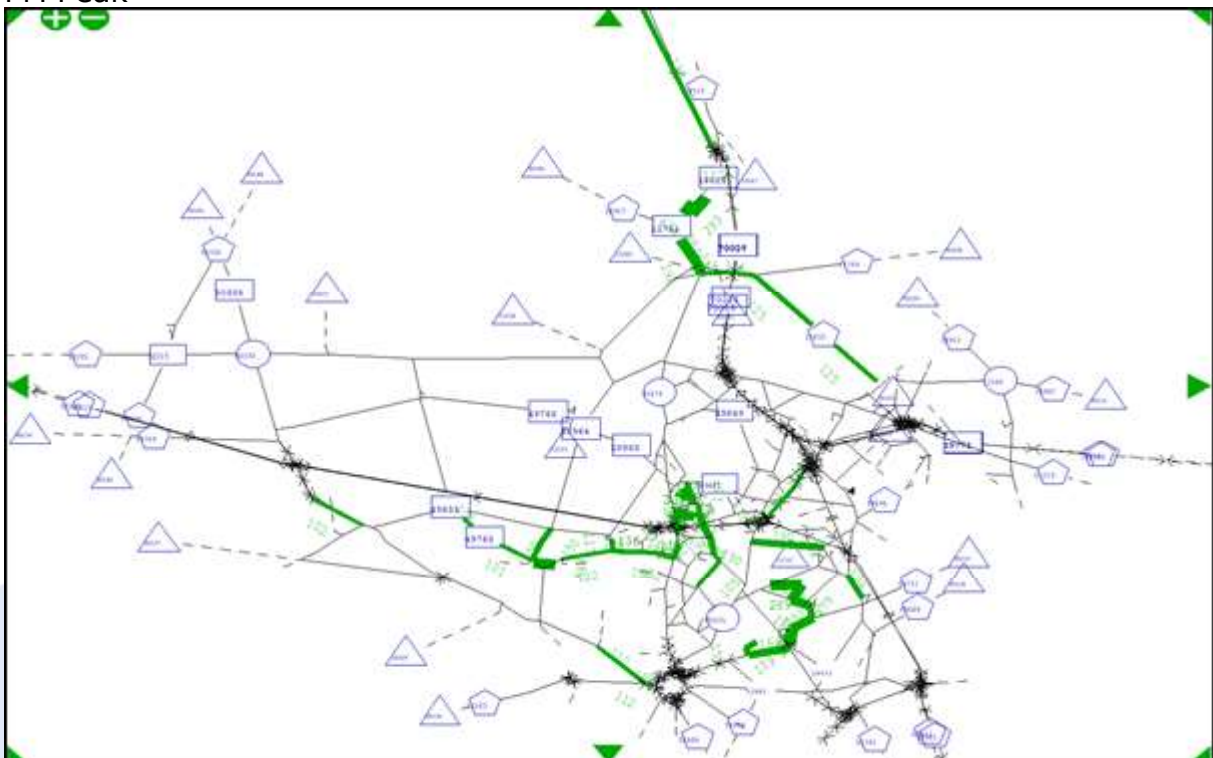
AM Peak

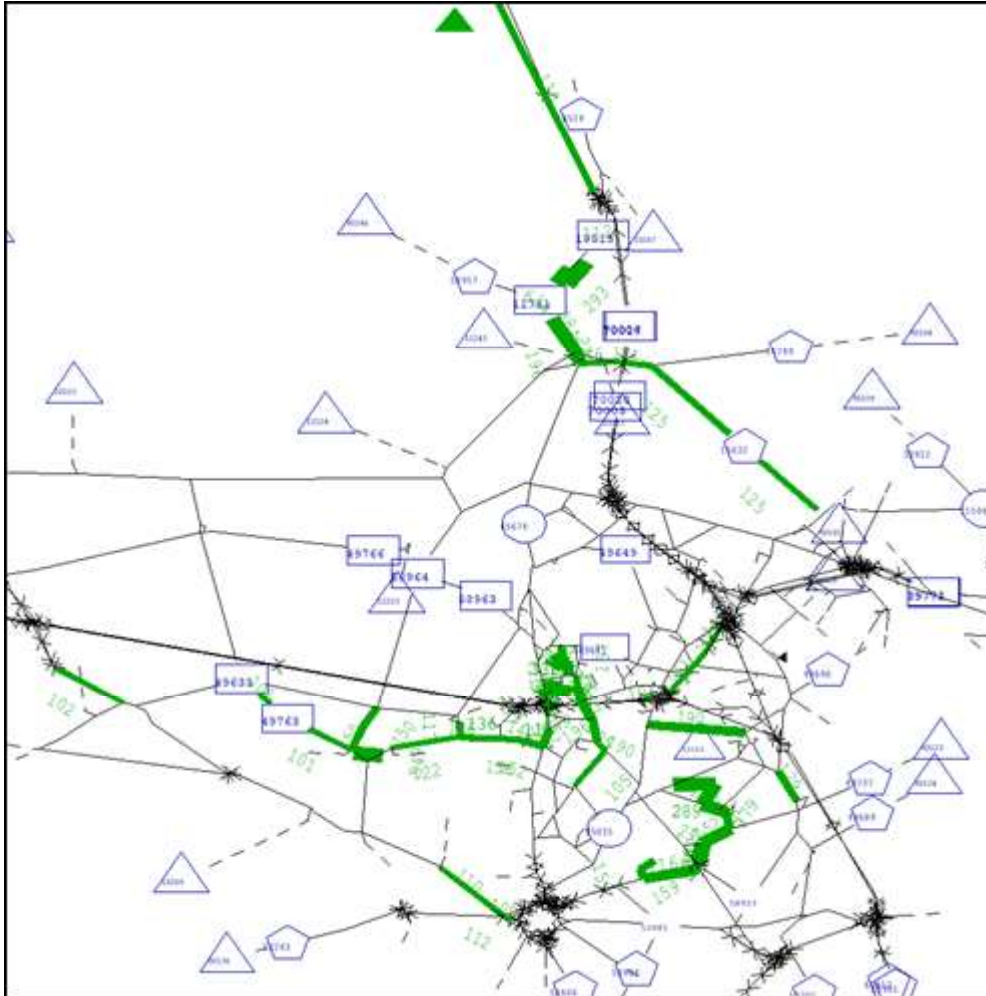






PM Peak





As can be seen, there are significant changes on the following parts of the road network:

AM Peak (0800 – 0900 hours)

- A449 between M6J13 and Gailey;
- Through Penkridge to Cannock via the B5012;
- A449 between Coven (double roundabouts) and the Oxley area of Wolverhampton;
- M54J2 to M6 (via new link road);
- Cat and Kittens Lane and Bushbury Lane (into Wolverhampton);
- Wobaston Road and Pendeford Mill Lane (into Bilbrook); and
- Blackhalve Lane, B4484 Long Knowle Lane, Lichfield Road and Wednesfield Way (all within Wolverhampton's boundary).

PM Peak (1700 – 1800 hours)

- M6J13 northbound;
- A449 between M6J13 and Penkridge centre;
- Through Penkridge to Cannock via the B5012;
- A449 between Brinsford and the Wobaston Road area of Wolverhampton;
- Bognop Road (from A460 to Essington village);
- Cat and Kittens Lane and Bushbury Lane (into Wolverhampton);

- Wobaston Road and Pendeford Mill Lane (into Bilbrook);
- Wood Road (between Codsall and Codsall Wood);
- Albrighton Bypass (south of M54J3);
- A41 as it approaches Wolverhampton ring road; and
- Blackhalve Lane, Lichfield Road, Wednesfield Way and a small section of A462 to the south of Sneyd Lane to Lichfield Road (all within Wolverhampton's boundary).

Land East of Bilbrook and Land at Keepers Lane and Wergs Hall Road, Codsall (Total of 1,165 dwellings)

Staffordshire County Council has the following comments and observations in response to the strategic site and other proposed allocation(s) in the Bilbrook and Codsall areas. These include 848 new homes on Land East of Bilbrook (covered by Policy SA1) and also 317 homes at Keepers Lane and Wergs Hall Road.

Accessibility

Please refer to the accessibility plans in the enclosures. None of the sites are within 350 metres of an existing bus service or rail station and consequently do not have access to supermarkets, employment or hospitals by public transport. The whole of both sites are within a 20-minute walk of GP services. The Bilbrook site is within a 10-minute walk of a new first school whilst the Codsall site is within 20 minutes of an existing first school. Both sites are within a 20-minute walk of existing middle schools.

Walking and Cycling Proposals

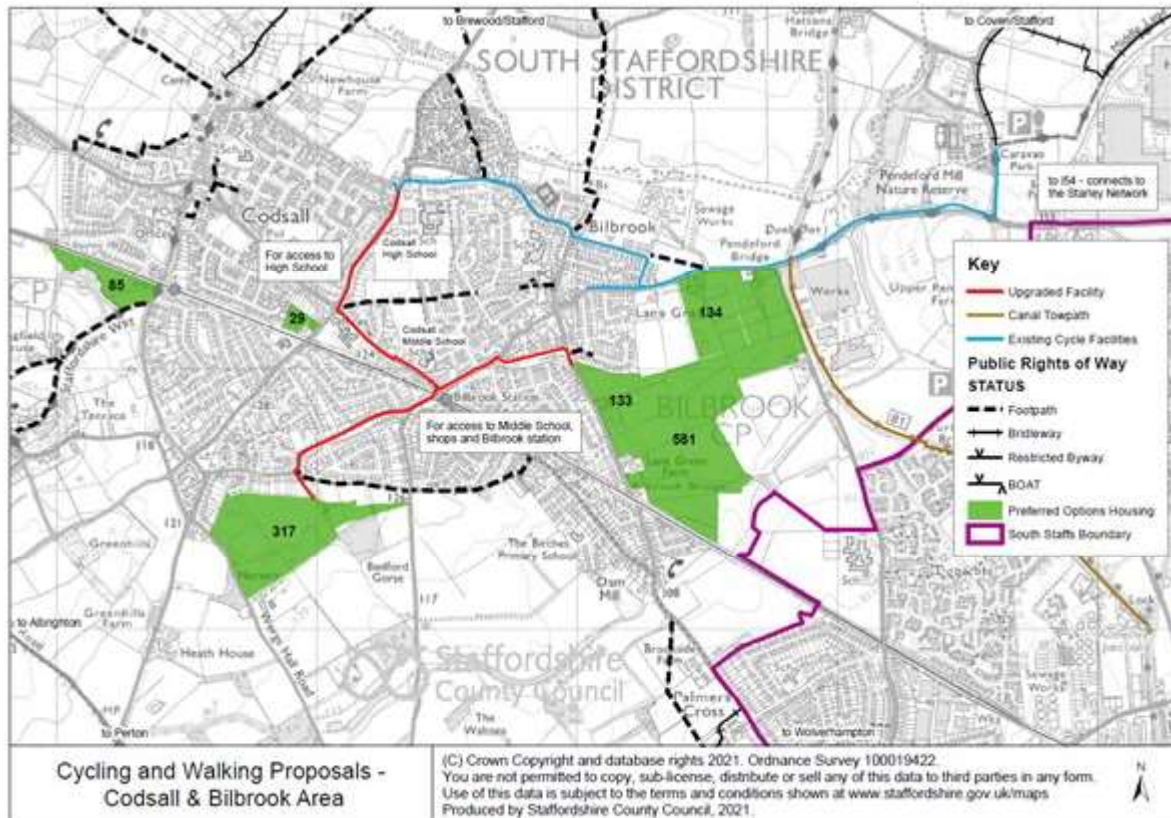
The Preferred Option development proposals are for 1,165 new homes in the Bilbrook and Codsall area, spread over the two largest sites. The developers will need to ensure that their sites are well connected to key attractions within the vicinity of the developments including the Middle and High schools, the railway stations and village centres. There may also be opportunities to provide or connect into more attractive leisure routes.

The Cycling and Walking Proposals Plan for Codsall and Bilbrook Area shows the active travel routes that SCC would like to see come forward in support of the proposed new developments. These include:

- Provision or enhancement of a cycling and walking facilities from the southern site onto Suckling Green Lane heading in a north-easterly direction onto Keepers Lane and through the double mini roundabout junction to Wolverhampton Road / Duck Lane. Depending on traffic flows, this could require just signage. The route will provide access from the new housing to Bilbrook train station and the local amenities available here. In addition, in conjunction with the routes below, it will also provide access to the middle and high schools.
- Continuing from above, in a north-westerly direction along Wolverhampton Road, passed Codsall Middle School and the council offices, to Histons Hill traffic lights and then northbound to Codsall High School. A suitable crossing facility will be required as the route switches from the north side of the road to the south.



- Continuation of the route to Bilbrook railway station, heading north-easterly along Duck Lane to Brookfield Road, then along Brookfield Road to Lane Green Road and connecting into the northern site in Bilbrook. A suitable standard crossing facility will be required in the vicinity of Duck Lane / Brookfield Road.
- Connections will be required from the northern site into the existing facilities along Pendeford Mill Lane and beyond.



## Highway Impact

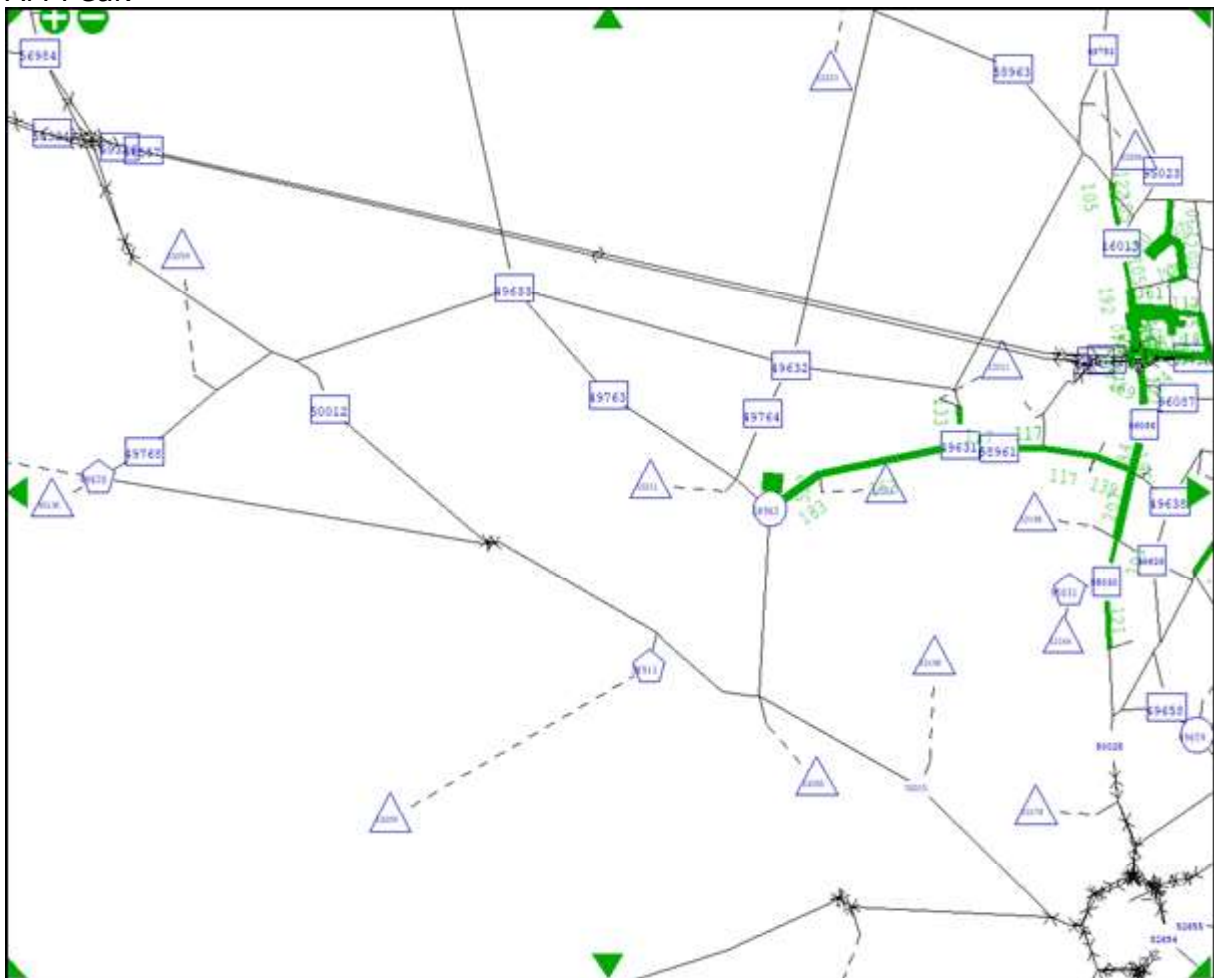
One of the limitations of the SATURN model is that some parts of the network, due to its strategic nature, have been coded 'coarsely' with some generalisation of the local road network. This becomes more prevalent the further away from the A road and Strategic Road Network locations are. As can be seen in the screenshots below, the model network through Codsall and Bilbrook does have a level of coarseness and generalisation. For example, only one route is modelled to the A41, which is intended to represent several potential routes including via Hists Hill, Wergs Hall Road and Keepers Lane. However, the model outputs do give information on the directions of travel that trips from the new developments wish to take so allowances can be made for this. In this case, the impacts on the A41 junctions will be shared rather than accruing at the one place and should therefore be less problematic.

Focussing on the Codsall and Bilbrook areas in more detail, in practice two larger sites make up the majority of the strategic allocation - 848 new homes on Land East of Bilbrook and 317 homes at Keepers Lane and Wergs Hall Road.

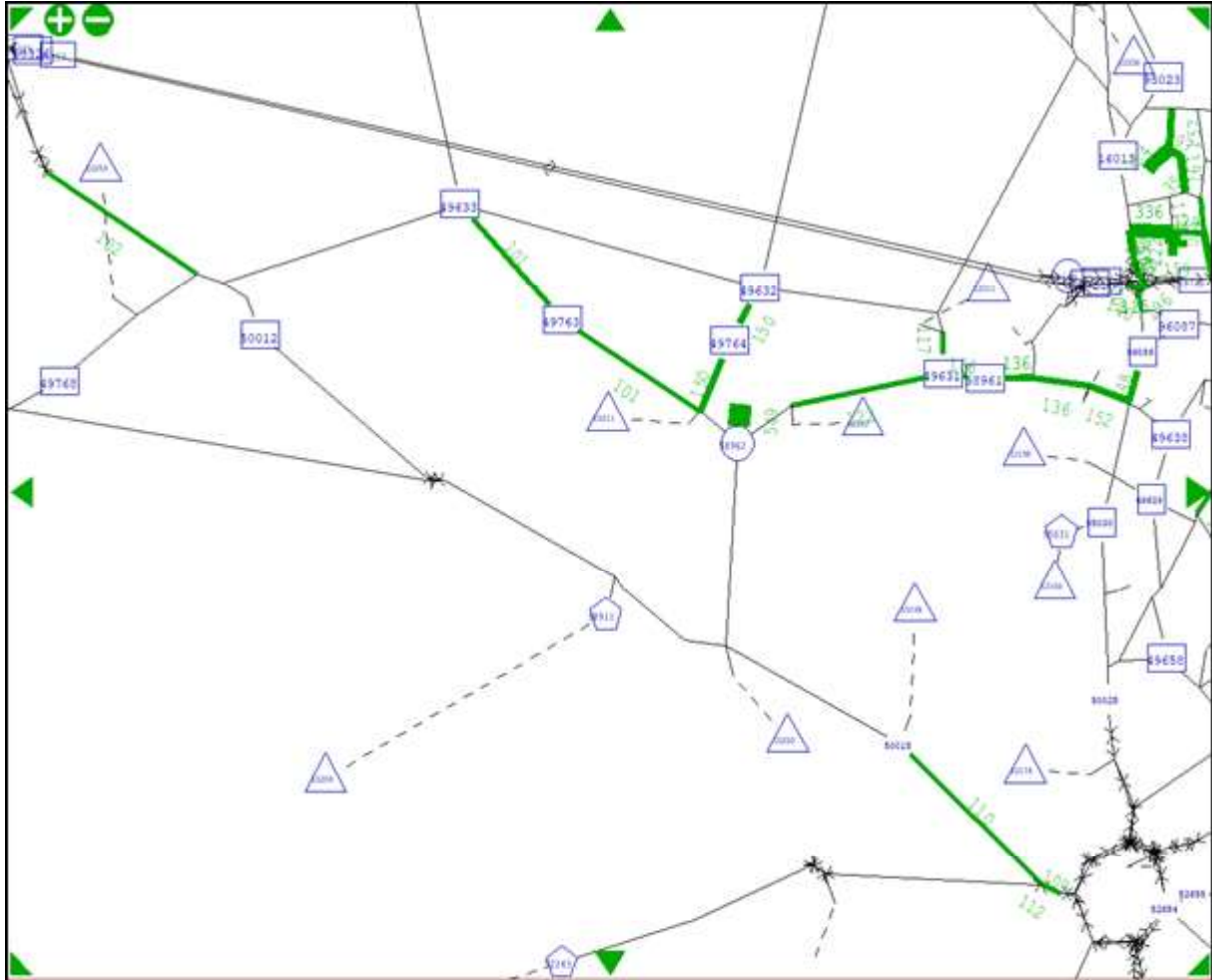
Analysis of the traffic model has shown that there are increases in trips (i.e. greater than 100 2-way trips) in the modelled peak hours (0800-0900 hours and 1700-1800 hours) in the following nearby locations. These are also displayed on the ensuing screenshots:

- A449 between Coven (double roundabouts) and the Oxley area of Wolverhampton;
- M54J2 to M6 (via new link road);
- Wobaston Road and Pendeford Mill Lane (into Bilbrook); and
- Wood Road (between Codsall and Codsall Wood);
- Albrighton Bypass (south of M54J3); and
- A41 as it approaches Wolverhampton ring road.

#### AM Peak



PM Peak



While the impacts of this development will affect SCC's road network, much of it will be on CWC and NH (National Highways) networks. All three authorities will need to advise on the scope of any Transport Assessments that the developer is required to undertake to ensure that mitigation is provided where necessary.

Increases on the A449 between Wobaston Road and M54 J2, and additional flows on M54 between J2 and the M6 are partly from the sites in Codsall and Bilbrook, but also from Cross Green site and to a lesser extent the Linthouse Lane site.

In terms of Staffordshire's network, it is considered unlikely that there are any impacted locations that could not be mitigated to ensure the network continues to operate satisfactorily.

The developer will need to assess (and mitigate where necessary) the impact of trips at junctions onto the A41, and also several junctions on the route making up Pendeford Mill Lane, Duck Lane, Wolverhampton Road and Histons Hill. Whilst any assessment requirements won't be limited to these, the junctions of Duck Lane / Wolverhampton Road / Keepers Lane / Birches Road and Histons Hill / Elliots Lane / Wolverhampton Road are known to be congested at peak times and are likely to require improvement.



The intention is that the traffic flow information derived from this model is used to inform the scope of the more detailed transport assessment work being prepared by the developers promoting these sites. It is possible to use the model information to estimate the relative contributions towards mitigation where several developments are impacting in a given location.

#### Land at Cross Green (1,200 dwellings and Proposed Brinsford Parkway Railway Station)

SCC has the following comments and observations in response to the strategic site at Cross Green (circa. 1,200 new homes, with a Parkway railway station).

#### Accessibility

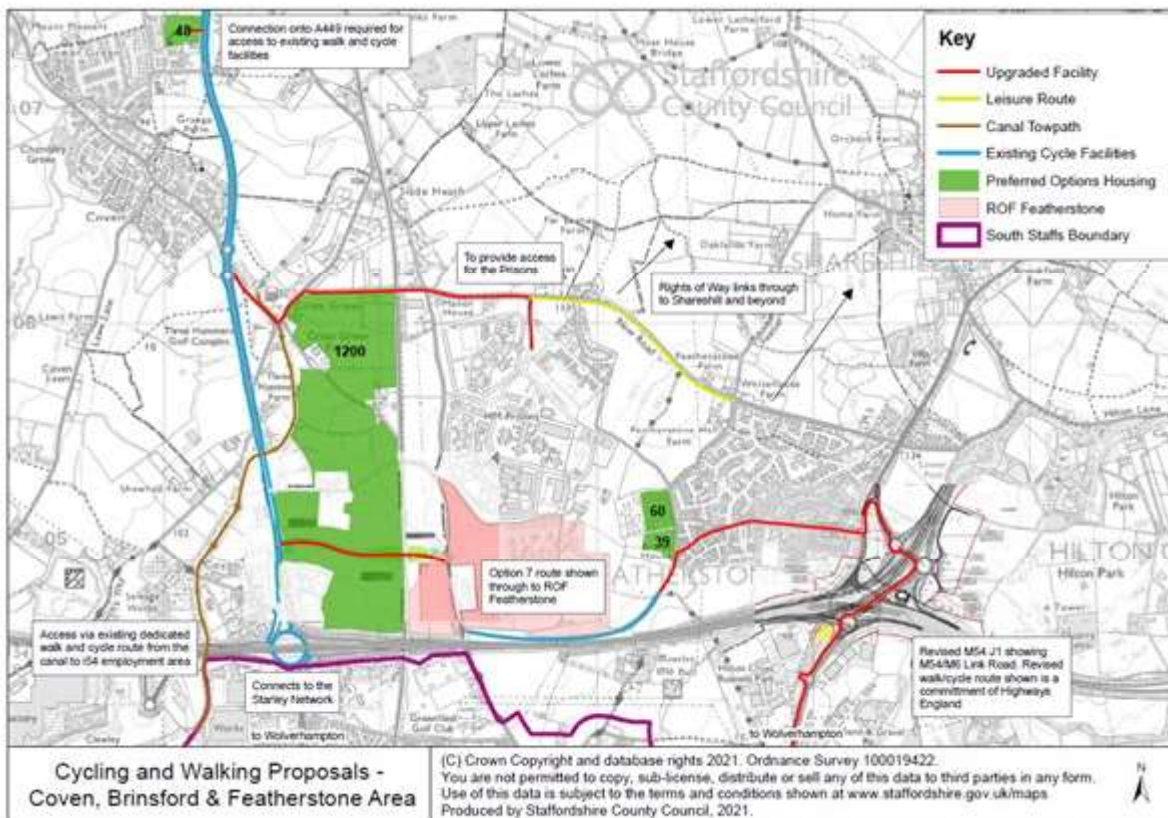
Please refer to the accessibility plans in the attached 'Accessibility Plans.zip' file. Virtually none of the site is within 350 metres of an existing bus service or rail station and consequently does not have access to supermarkets, employment or hospitals by public transport. The whole site is within a 30-minute walk of GP services. Approximately two thirds of the site is within a 10-minute walk of a new first / primary school whilst the remainder is within 20 minutes. It needs to be established whether two tier or three tier education will be operated.

#### Walking and Cycling Proposals

The developer will need to ensure that their sites are well connected to key attractions within the vicinity of the development including schools, the railway station and other nearby local amenities. There may also be opportunities to provide and connect into more attractive leisure routes via the canal and existing footpaths and bridleways.

The plan below (Cycling and Walking Proposals - Coven, Brinsford and Featherstone Area) shows the active travel routes that SCC would like to see come forward in support of the proposed new developments. These include:

- Footway / cycleway provision along Brewood Road, connecting into the existing facilities on the A449 with an improved LTN 1/20 standard junction;
- Footway / cycleway provision along New Road, connecting into the existing employment destinations at and near to the prisons at Oaks Drive;
- Continue footway and cycle provision along New Road, between Oaks Drive and Featherstone Lane (approximately 1km) to provide linkages to various leisure routes which can be accessed to the north of New Road in the vicinity of Featherstone Lane. Providing access to leisure routes will help with placemaking and provide a quality living environment for new residents; and
- Improved access to the Canal towpath at the Dark Lane / Old Stafford Road / Brewood Road junction combined with enhancements to the canal towpath (where required) between The Anchor Inn and I54 employment area. providing connectivity to jobs and the conurbation, taking into account environmental constraints.
- The proposed new road linking the A449 to ROF Featherstone and providing the main access to the Cross Green site, is currently designed with a 3.0m shared footway cycleway facility. To comply with LTN 1/20 this should be redesigned and delivered with a segregated facility



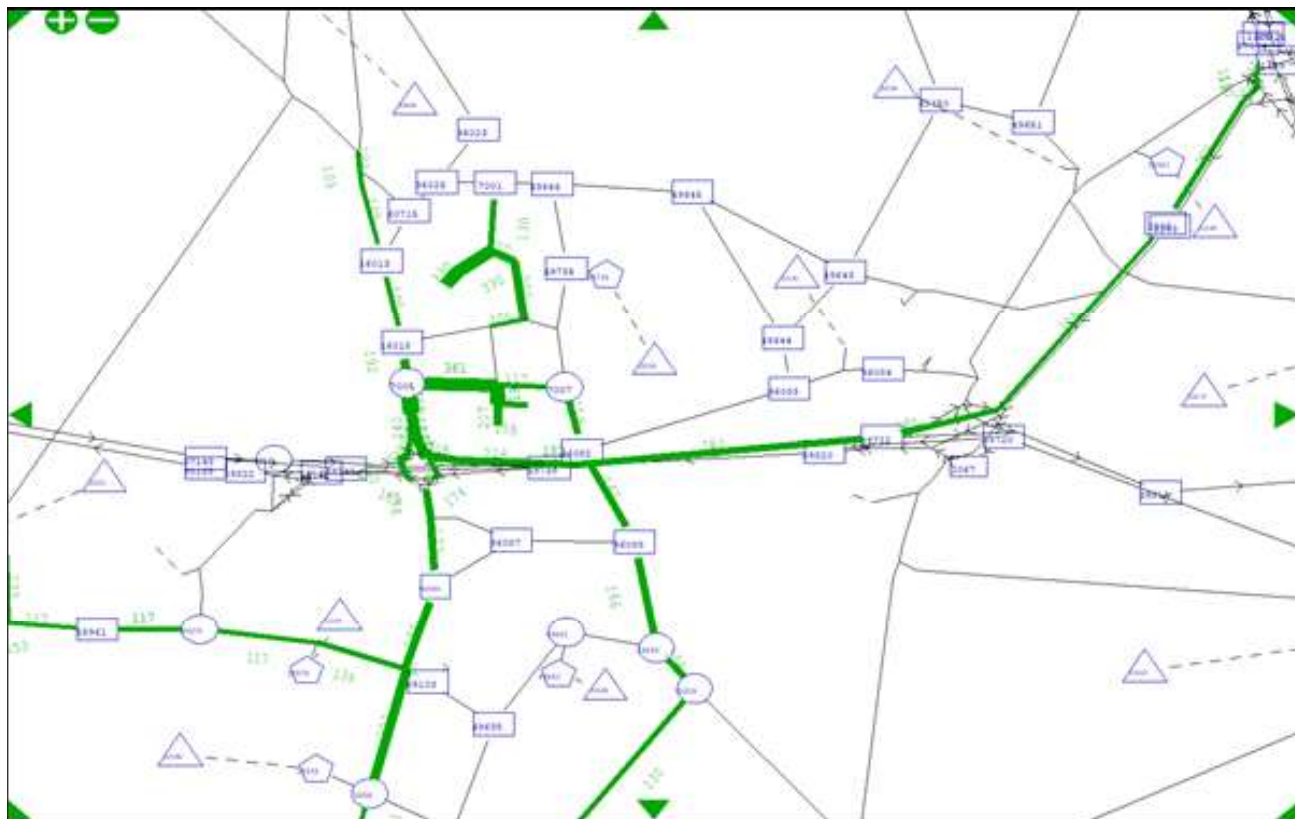
## Highway Impact

Focussing on the Cross Green area, 1,200 proposed new homes and 500 car park spaces at the Brinsford Parkway station have been included within the SATURN traffic model. Trips from this development will have the choice to access the existing road network via A449, New Road or Cat and Kittens Lane.

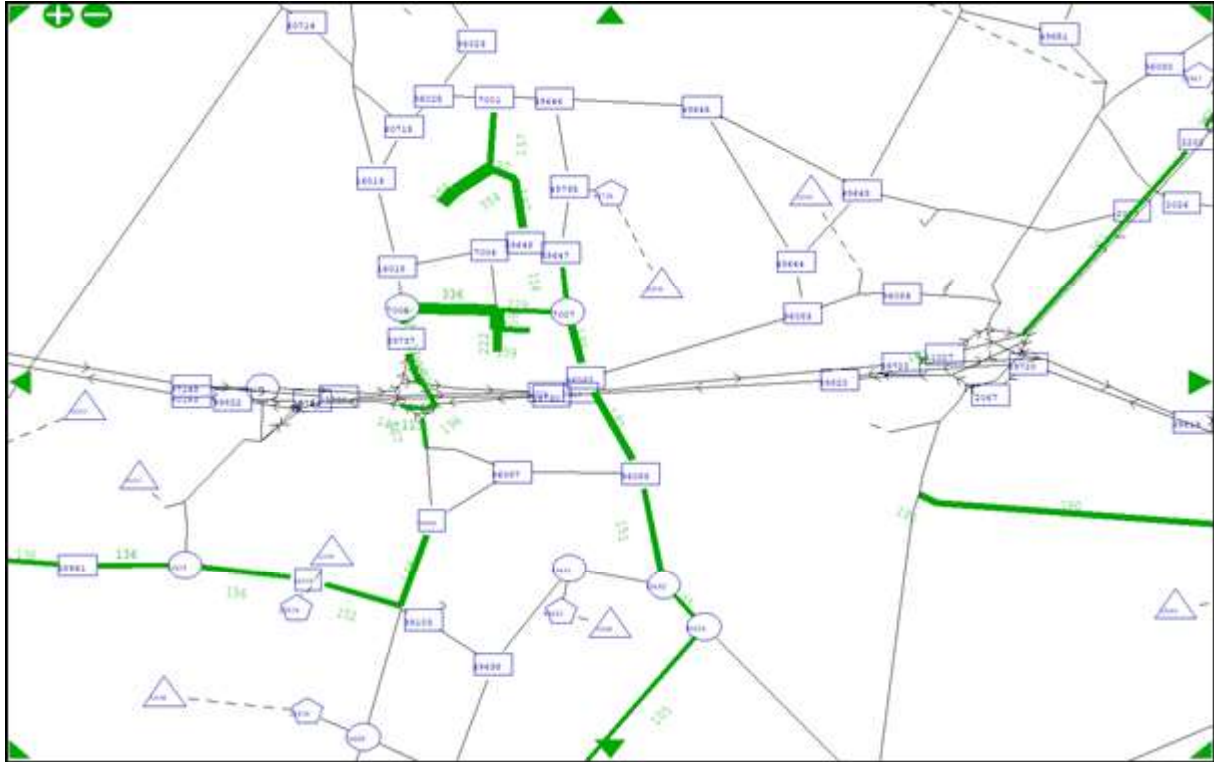
There are two new committed road schemes in the area that will affect future route choices and traffic flows. These are a link through this housing proposal from Cat and Kittens Lane to the A449 (to be provided by the developers of ROF Featherstone) and the M54-M6 link, providing relief to the A460 to the east of this development. These are both included within the traffic modelling.

Analysis of the traffic model has shown that there are increases in trips (i.e. greater than 100 2-way trips) in the modelled peak hours (0800-0900 hours and 1700-1800 hours) in the following nearby locations - also displayed on the following screenshots:

- A449 between Coven (double roundabouts) and the Oxley area of Wolverhampton;
- M54J2 to M6 (via new link road); and
- Cat and Kittens Lane and Bushbury Lane (into Wolverhampton).



PM Peak



As well as the locations listed above, the screenshots show impacts on Wobaston Road and Bognop Road. However, further investigation of increases on Wobaston Road and Pendeford Mill Lane (into Bilbrook) have shown that this is mainly due to the strategic sites within Codsall and Bilbrook. Increases on Bognop Road are mainly associated with traffic from the Linthouse Lane strategic site.

Increases on the A449 between Wobaston Road and M54J2, and additional flows on M54 between J2 and the M6 are from this site and the Codsall / Bilbrook sites. There is also a smaller impact on the M54 from the Linthouse Lane site.

While some of the impacts of this development will affect SCC's road network, the majority will be on CWC and NH (National Highways) networks. All three authorities will need to advise on the scope of any Transport Assessments that the developer is required to undertake to ensure that mitigation is provided where necessary. In terms of Staffordshire's network it is considered unlikely that there are any impacted locations that could not be mitigated to ensure the network continues to operate satisfactorily.

The intention is that the traffic flow information derived from this model is used to inform the scope of the more detailed transport assessment work being prepared by the developers promoting these sites. It is possible to use the model information to estimate the relative contributions towards mitigation where several developments are impacting in a given location.

Land off Linthouse Lane (1,200 dwellings)



Staffordshire County Council has the following comments and observations in response to the strategic site off Linthouse Lane.

This site is situated on the edge of the administrative boundary and many of the impacts and proposals may be witnessed in the City of Wolverhampton Council's (CWC) area.

### Accessibility

Please refer to the accessibility plans in the attached 'Accessibility Plans.zip' file. The western and southern edges of the site are within 350 metres of a bus service and hence between 11 and 20 minutes access by bus to supermarkets on a weekday and Saturday; have access to a limited choice of employment via bus; and are within 11 to 30 minutes access to hospital by bus. The remainder of the site has no access. The whole site is within a 20-minute walk of GP services and a 10-minute walk of a new primary school.

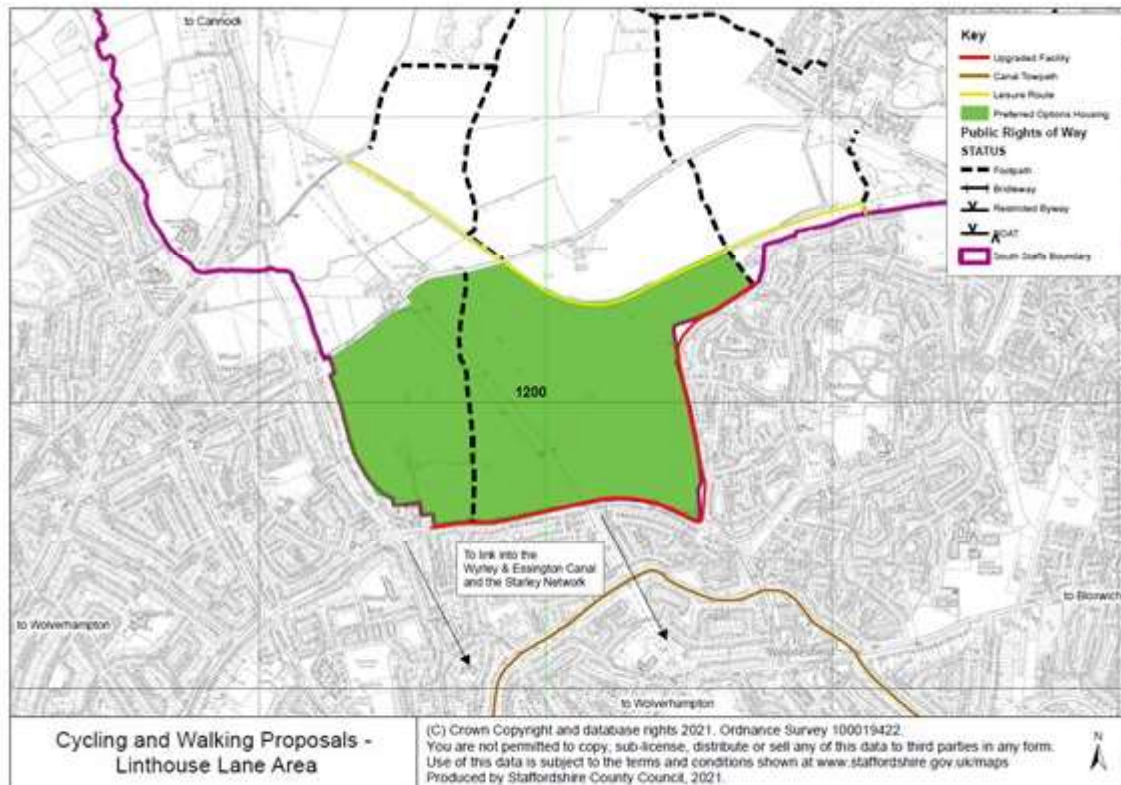
### Walking and Cycling Proposals

This Preferred Option development proposal is for 1,200 new homes within South Staffordshire but on the edge of Wolverhampton. Most of the impacts of the development will be within the CWC boundary, as will most of the local facilities and amenities used by its residents. The developer will need to ensure that the site is well connected to key attractions within the vicinity of the development and should also consider opportunities to provide or connect into more attractive leisure routes.

Cycling and walking opportunities for this site will largely need to be determined by City of Wolverhampton Council. However, the plan below (Cycling and Walking Proposals – Linthouse Lane Area) shows the active travel routes that SCC thinks should come forward in support of this development. These include:

- Consideration of a segregated cycle/footway on Linthouse Lane and Kitchen Lane and LTN 1/20 crossing provision providing access to residential areas to the west, south and east;
- Good connections to the canal and the Starley Network in the south; and
- Good connections to Staffordshire Railway Walk in the north, taking into account potential land ownership issues.



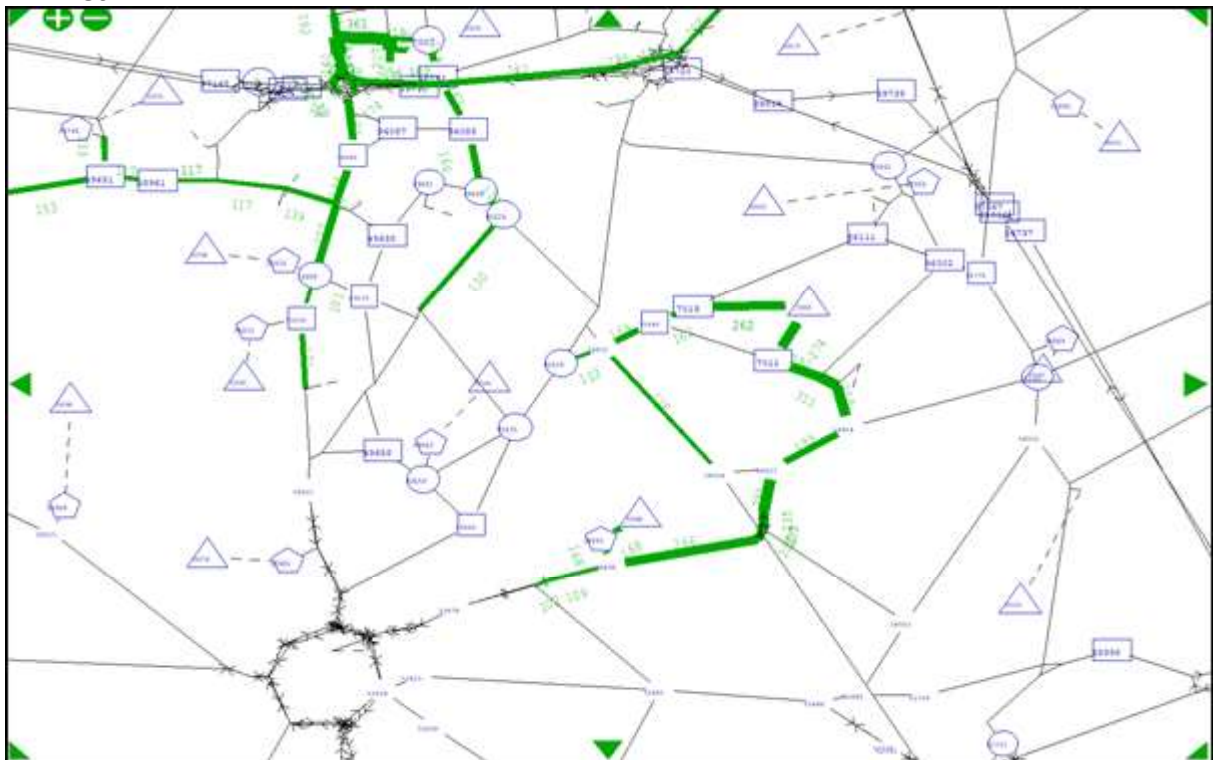


### Highway Impact

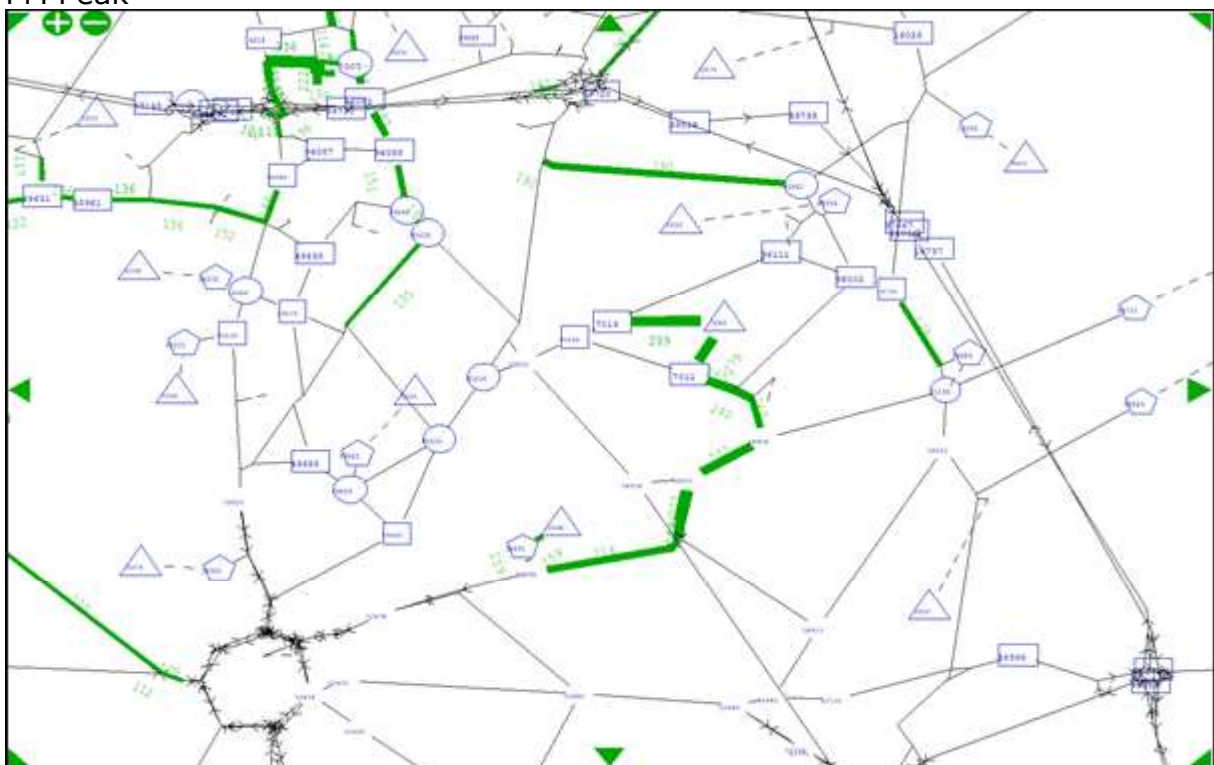
Focusing on the Linthouse Lane site in more detail, 1,200 new homes were modelled in the SATURN traffic model with access to the existing road network via Blackhalve Lane and Linthouse Lane.

Analysis of the model has shown that there are increases in trips (i.e. greater than 100 2-way trips) in the modelled peak hours (0800-0900 hours and 1700-1800 hours) in the following nearby locations. These are also displayed on the ensuing screenshots:

- M54J2 to M6 (via new link road);
- Blackhalve Lane, B4484 Long Knowle Lane, Lichfield Road and Wednesfield Way and a small section of A462 to the south of Sneyd Lane to Lichfield Road (all within Wolverhampton's boundary); and
- Bognop Road (from A460 to Essington village).



PM Peak



INVESTORS  
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on the scope of any Transport Assessments that the developer is required to undertake to ensure that mitigation is provided where necessary.

SCC has shared outputs from the SATURN model with CWC for them to consider the impacts on their network. Please refer to CWC's consultation response for more information.

The traffic Model indicates that increases in traffic flows on the M54 between J2 and the M6 are in some part due to this development, though most of the cumulative impact is from the sites at Cross Green and in Codsall and Bilbrook. In terms of Staffordshire's network it is considered unlikely that there are any impacted locations that could not be mitigated to ensure the network continues to operate satisfactorily.

The developer will need to assess (and mitigate where necessary) the impact of trips on the A460, Bognop Road and travelling through Essington.

The intention is that the traffic flow information derived from this model is used to inform the scope of the more detailed transport assessment work being prepared by the developers promoting these sites. It is possible to use the model information to estimate the relative contributions towards mitigation where several developments are impacting in a given location.

#### Penkridge Area (Penkridge North 1,129 dwellings)

SCC has the following comments and observations in response to the strategic site at Penkridge which includes a site to the north of the village for 1,129 dwellings, accessed directly off the A449. There is also an existing consent in this location for 200 new homes, bringing the overall number of dwellings in this area to 1,329 units.

#### Accessibility

Please refer to the accessibility plans in the attached 'Accessibility Plans.zip' file. Approximately 50% of the site is within a 350 metre walk of a bus stop. This proportion of the site is within a 10-minute bus journey to a supermarket on a weekday and a Saturday; has access to a limited choice of employment via bus and rail; and is within a 40-minute bus journey to a hospital. Most of the site is within a 30-minute walk distance of GP services. Most of the site is within a 10-minute walk of a new first school and a 40-minute walk of Penkridge Middle School.

#### Walking and Cycling Proposals

The developer will need to ensure that the site is well connected to key attractions within the village such as the Middle and High Schools, the village centre and the railway station. There are also opportunities to provide more attractive leisure routes from the site to the village via the canal and existing footpaths and bridleways.

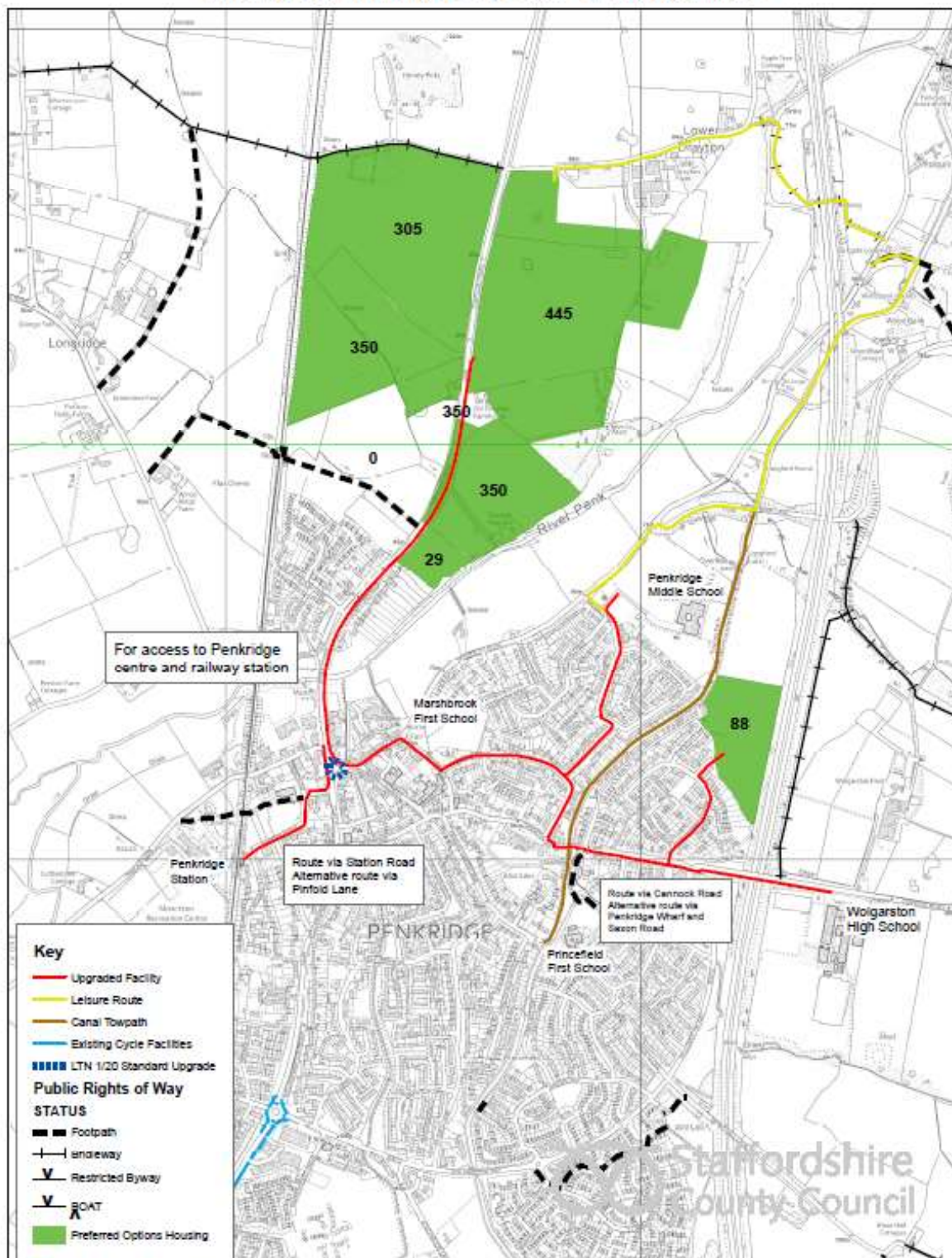
The plan below (Cycling and Walking Proposals – Penkridge Area) shows the active travel routes that SCC would like to see come forward in support of the proposed new developments. These include:

- Shared footway / cycle provision along the A449 from a crossing facility at the southern parcel of the development to Crown Bridge junction;

- Connections from Crown Bridge to the railway station, via St. Michael's Square and Station Road;
- Connections from Crown Bridge to the Middle School, via Mill Street, Bell Brook, Haling Road and Marsh Lane; and
- Connections to the High School from Haling Road and Cannock Road.
- The more attractive leisure route would head east out of the northern site, under the M6 via an existing crossing and joining the canal near Teddesley and heading south towards the village, with a spur off to the Middle school. Upgrades to towpaths and footpaths/bridleways would be required.



## Cycling and Walking Proposals - Penkridge Area



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## Highway Impact

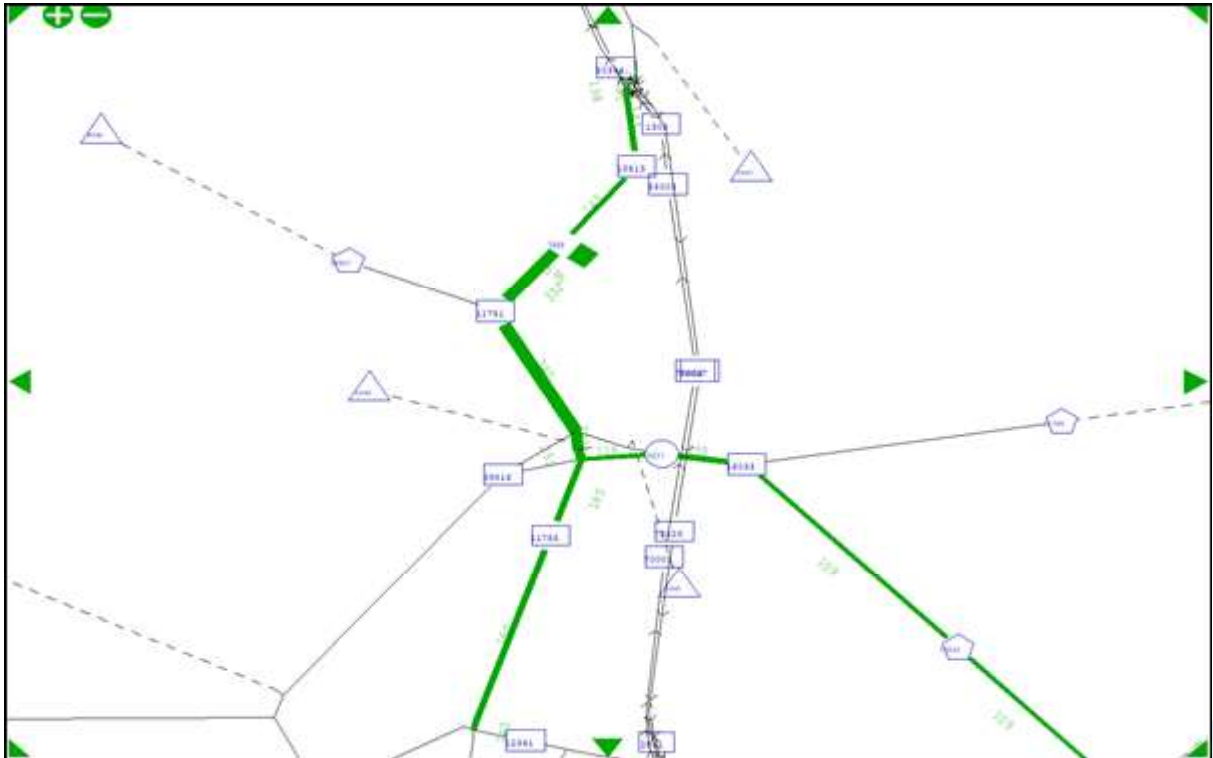
Focussing on the Penkridge area, 1,329 new homes have been included in the traffic model, loading directly off the A449 to the north of the village centre. This includes an allocation of 1,129 new homes plus 200 which already have consent but were not included in the existing traffic model. A smaller site for 88 dwellings (Land at Cherrybrook) has not been included in this strategic modelling exercise.

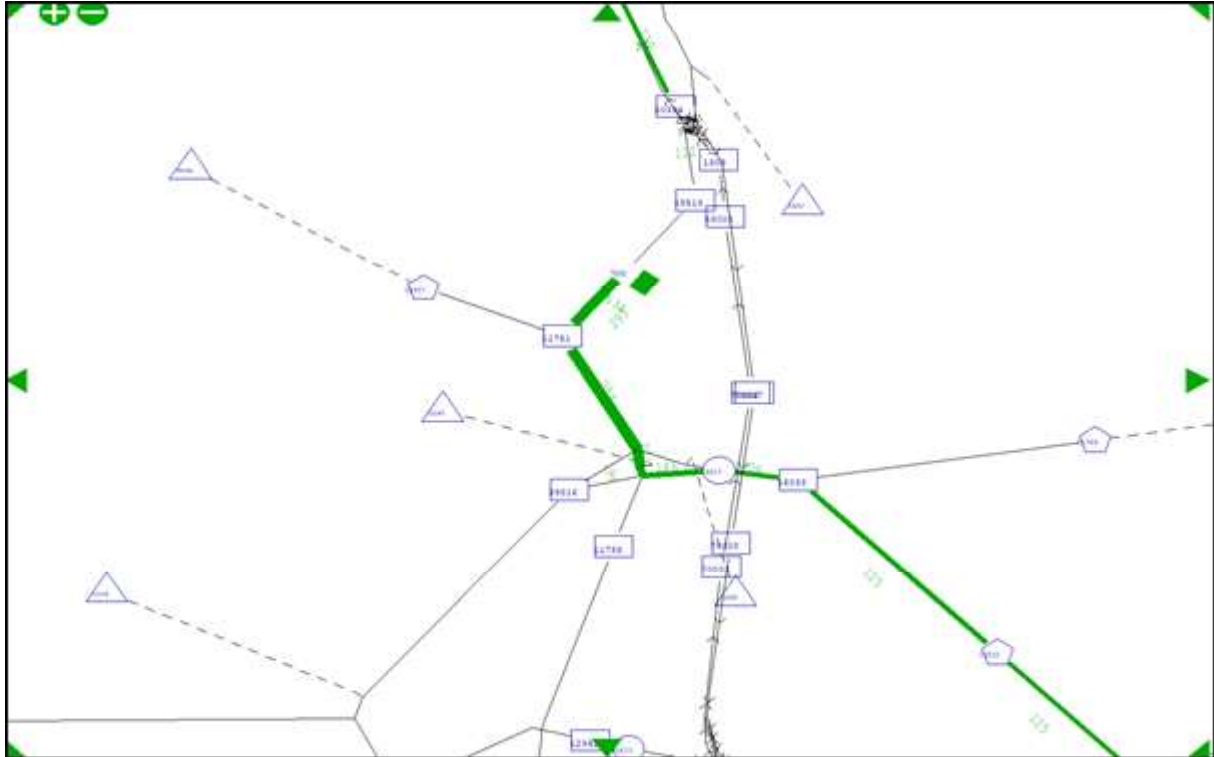
Analysis of the traffic model has shown that there are increases in trips (i.e. greater than 100 2-way trips) in the modelled peak hours (0800-0900 hours and 1700-1800 hours) at the following locations. These are also displayed on the screenshots below:

- M6;
- A449 (from M6J13 to Gailey); and
- through Penkridge towards Cannock.

Most of these increases will be due to trips from the Penkridge site, although a small number of them will have originated from the other strategic sites contained within the model.

### AM Peak





To the south on the A449, there are around 300 to 350 additional 2-way trips between the development and the centre of the village. The traffic disperses as it leaves the village, with some trips terminating within the village, some travelling to and from Cannock (around 150 2-way trips in each peak hour) and some heading towards Gailey (just over 150 2-way trips in the AM peak, much less in the PM).

This additional traffic on the A449 will put pressure on the side roads and the ability for vehicles to exit from them. The developer will need to assess the capacity of various junctions along the route through the village. The main junction in the centre of Penkridge at Stone Cross is highly likely to require an improvement, and potentially other junctions such as the A449 / New Road. In addition, routes through the village towards Cannock will need to be assessed. Gailey island has been problematic for many years and will require an assessment. The proposed nearby freight depot will also add traffic at this location. However, the introduction of the new M54-M6 link road should relieve some pressure at the roundabout and the additional trips are unlikely to cause any unsurmountable problems.



INVESTORS  
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possible to use the model information to estimate the relative contributions towards mitigation where several developments are impacting in a given location.

Pp 53 Policy SA1 – Strategic Development Location : Land East of Bilbrook.

Pp 54 Policy SA2 – Strategic Development Location : Land Cross Green.

Pp 55 Policy SA3 – Strategic Development Location : Land North of Linthouse Lane.

Pp 56 Policy SA4 – Strategic Development Location : Land North of Penkridge.

SCC welcomes the preparation of Supplementary Planning Documents (SPD) and Infrastructure Delivery Strategies (IDS) to inform the release and phasing of these strategic sites. As referred to above, Staffordshire County Council has been working in partnership with SSDC, undertaking technical work to help show how these large housing allocations could be made acceptable in transport terms and this information can help inform the SPD and IDS.

Pp 57 Q7 SCC supports the proposed housing allocations in policies SA1-SA4 as long as they are supported by a robust evidence base that demonstrates how they can be made acceptable in transport terms. SCC has been working with SSDC to provide high level assessment work to help identify any showstoppers from a capacity, accessibility and connectivity perspective. This work will be presented in the 'Transport Impacts (with SCC) 2022' report.

b) Do you agree that given the scale of the 4 sites detailed in policies SA1-SA4, these warrant their own policy to set the vision for the site, alongside a requirement for a detailed masterplan and design code. Yes – from a transport acceptability perspective, the policy, vision and master planning needs to be developed at the earliest opportunity informed by the technical work referred to, supplemented by evidence provided by site promoters.

#### Pp58 Housing Allocations

pp 58 – pp 59 - Policy SA5 proposes housing allocations for settlements in Tiers 1-4 and other sites adjacent to neighbouring towns and cities (Stafford – Weeping Cross – 168 units and CWC Langleigh – 390 units). Appendix C contains housing allocation maps and proformas. It is noted that all of the proposed accesses just refer to vehicles and pedestrians, with no reference cycle access.

Pp 60 Q 8. SCC has reviewed the sites within Policy SA5 from a development management perspective and provided comments already regarding their potential to be served from the highway. Plans showing relative accessibility have also been produced for the majority of these sites.

Plans showing recommended and potential walking and cycling improvements to provide necessary connectivity have also been produced and are enclosed. These should be used to guide further assessment work should the sites be allocated.



SCC will expect each developer to engage with our Development Management section to scope out a Transport Assessment and identify any mitigation that is required to make the developments acceptable in transport terms. It is not envisaged at this stage that there would be any unsurmountable problems that would stop these sites coming forward through the Local Plan process.

#### Pp 63 Employment

Policy SA7 concerns the Employment Allocation – West Midlands Interchange.

Pp 65 Q 10 - SCC was an active participant in the Development Consent Order (DCO) process leading to the grant of planning consent and supports the proposed allocation having agreed the necessary mitigation to make development here acceptable in transport terms.

#### Pp 66 Development Management Policies.

Pp 66 para 6.4. It is noted that policies do not reflect the final wording but highlight key requirements, aims and measures that the final submitted policies will deliver.

#### Pp 71 HC9 – Design requirements

South Staffordshire Design Guide 2018 requires updating to reflect Cycle Infrastructure Design (Local Transport Note 1/20), Department for Transport, 2020, as advised by the National Model Design Code that refers to LTN 1/20 as detailed guidance that should inform local design codes. The five core design principles in LTN 1/20 are essential requirements that developers need to take into account. Based on best practice, routes should be Coherent; Direct; Safe; Comfortable and Attractive. By encompassing LTN 1/20 standards within South Staffordshire's Design Guide, developers will be aware of what is expected in Design and Access Statements and site-specific masterplans. This will ensure that high quality pedestrian and cycle facilities are regarded as an essential component of all site access and off-site highway works.

Pp 72 HC12 Parking Standards – the approach to electric vehicle charging for new development is welcomed to help reduce the impacts of climate change.

Pp 76 HC19 Wider green infrastructure design principles – the approach is welcomed to promote active travel.

Policy HC19 recognises the need to ensure that active travel opportunities are met within green infrastructure. It should be reflected in the Green Infrastructure SPD that delivery of this policy may require the upgrade of bridleways, footpaths and canals to provide high quality off-road provision for both pedestrians and cyclists to improve connectivity between development sites and local facilities/schools.

#### Pp78 Economic Vibrancy, Building a strong local Economy

EC1 Sustainable economic growth. The approach regards the promotion of active travel measures and multifunctional green spaces is welcomed but the policy needs to mention the requirement for public transport access to employment land.

SCC is concerned that the importance of Freight Infrastructure has not been sufficiently recognised.

SCC agrees that South Staffordshire is an attractive location for commercial development with a diverse range of small, medium, and large businesses and firms and its potential role in meeting the unmet employment needs of neighbouring authorities. We recognise the ambition to continue support and development of strategic employment sites including at i54 South Staffordshire, ROF Featherstone and West Midlands Interchange leading to greater inward investment and prosperity. We also note the concerns relating to the concentration of large scale developments, such as the West Midland Interchange (WMI) strategic rail freight interchange, which may pose a threat to the district in terms of the cumulative impact on the surrounding infrastructure.

We also recognise the importance of considering growth options in relation to their impacts on the highway network and how these are mitigated including the impacts of increased HGV usage and ability to park safely and securely.

HGV parking should be included as an example within policy EC1 – Sustainable Economic Growth which identifies support for provision of necessary infrastructure.

Pp 81 Community Services Facilities and Infrastructure

Policy EC9 - Infrastructure also identifies SSDCs willingness to work with partners to enable, support and co-ordinate delivery of infrastructure to support growth and infrastructure requirements within the Infrastructure Delivery Plan.

It is suggested that the Staffordshire Freight Strategy 2019 is referred to as a key evidence document within the Preferred Options report it can be found via the following link:

<https://www.staffordshire.gov.uk/Transport/transportplanning/localtransportplan/Documents/Staffordshire-Freight-Strategy-June-2019-final-version.pdf>

We are aware of critical shortages of HGV parking and driver welfare facilities across Staffordshire including South Staffordshire District. The Department for Transport National Survey of Lorry Parking 2017 identified that this HGV parking shortage is experienced across the region. Government too has recognised the critical importance of infrastructure to support hauliers and the logistics sector. In a ministerial statement of 8<sup>th</sup> November 2021 Government stated the planning system should play its part in meeting the needs of hauliers and addressing current deficiencies. Setting out proposals for short term measures and commitment to update both the National Lorry Parking Survey and Highways Circular 02/2013 The Strategic Road Network and the delivery of sustainable development.

Planning policies and decisions should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance. Proposals for new or expanded distribution centres should make provision for sufficient lorry parking to cater for their anticipated use.

The National Planning Policy Framework (NPPF) identifies two specific matters in relation to HGV parking:

1. the provision of overnight lorry parking facilities through planning policies, which should either propose sites or provide a supportive policy framework for anyone wanting to develop a lorry park. Key here is 'local shortages' where the highway authority will liaise with LPAs to ensure their plans make provision for lorry parks;
2. logistics sites should have adequate parking provision –existing sites may have parking but it is mostly operational i.e. part of the loading/unloading process. Other provision may be needed, similar to that proposed at the West Midlands Interchange not simply based on spaces per sq. m.

HGV parking areas are an important element of the logistics network and provide vital rest areas for drivers, help ensure safety for all road users and provide much needed security for transported goods, vehicles and drivers. These should be considered for inclusion within the reviewed Infrastructure Delivery Plan as they can be considered essential to support growth proposals.

HGV parking and driver welfare facilities are not specifically identified within the Preferred Options Plan and we feel this is an omission given the National Policy and the recent Ministerial Statement. Options for provision of facilities for HGV should be considered and identified for the next iteration of the Local Plan. We would be happy to provide support where required.

Pp 81 EC11 Sustainable transport – approach generally welcomed but the policy needs to support the delivery of Staffordshire's Bus Service Improvement Plan (BSIP) which also needs to be listed as key evidence.

#### Note on SCC LCWIP Process

Staffordshire's Local Cycling and Walking Infrastructure Plan (LCWIP) 2021 covers Burton upon Trent, Cannock, Lichfield, Newcastle-under-Lyme, Stafford and Tamworth. In 2021/22 the LCWIP is being expanded to include other medium-sized towns including Cheslyn Hay/Great Wyrley/Landywood. The LCWIP appraisals follow the methodology outlined by Department for Transport guidance. GIS analysis determines the routes that are likely to have the highest demand for cycling by mapping origin and destination points for commuter, school trips and forecast trips to/from development sites. These routes are further prioritised based on proximity to employment (including town centres), rail stations and accident data. The routes identified through the analysis are audited to determine a proposed coherent cycle network. Core walking zones focused on town centres are also assessed in terms of attractiveness, comfort, directness, safety and coherence. The outcome of the 2021/22 appraisals will be reported in an updated LCWIP due to be approved and published in 2022/23 and further updates will be made as resources permit.

#### Pp83 Under Key Evidence:

- add 'Brinsford Parkway Station Strategic Outline Business Case'.
- Delete Staffordshire Local Transport Plan 2011 and replace with South Staffordshire District Integrated Transport Strategy (to 2038) #

- Add Staffordshire Freight Strategy 2019
- Add Staffordshire's Bus Service Improvement Plan (BSIP) 2021

#The District Integrated Transport Strategy will be updated to reflect the emerging Publication Plan and will inform the next revision to the Infrastructure Delivery Plan.

Pp 92 Q 11 - do you agree with the proposed policy approaches set out in Ch 6?

Please see transport comments provided.

Q12

Do you agree that DS1-DS4 and SA1 – SA7 are strategic policies a) yes  
b) are there any other policies in Ch 6 that need to be identified as strategic policies?  
No.

Pp 96 Appendix B Strategic Masterplanning Location Proformas Land East of Bilbrook

The proforma plan should show the proposed link road between Pendeford Mill Lane, Barnhurst Lane and Lane Green Road.

## **Education**

Staffordshire County Council (SCC) has a statutory duty to ensure that there are sufficient school places to meet the needs of the population. The School Organisation Team (SOT) acts on behalf of the Local Authority to carry out this duty and to ensure that resources are used efficiently.

The district of South Staffordshire is made up of four distinct areas for the purpose of school place planning: 1) Cheslyn Hay & Great Wyrley, 2) Kinver & Wombourne, 3) Codsall & Perton and 4) Penkridge. These areas are broken down into smaller 'school place planning areas' and are used to plan the number of school places required. These school place planning areas have been grouped based on the geographical location of schools, and by assessing pupil movement between schools and catchment areas in line with Department for Education guidance.

A two-tier education system, with Primary (4-11 years) and Secondary (11-18 years) schools, operates in Cheslyn Hay & Great Wyrley and Kinver & Wombourne, whilst in Codsall, Perton and Penkridge, a three-tier system with First (4-9 years), Middle (9-13 years) and High (13-18 years) schools, operates.

Sixth form provision is offered on site at all secondary and high schools within the district.

SOT has been working with South Staffordshire District Council to devise a strategy to aid their Local Plan aspirations. We expect that this will continue as the Local Plan progresses.

There has already been a total of 750 dwellings that have been delivered from 2018 to 2021. It is noted that SSDC are proposing to make provision for at least 4,131 dwellings between 2021 and 2038 which will equate to an annual requirement of around 243 dwellings. SSDC are also looking to deliver a proportion of the unmet

need of the Greater Birmingham Housing Market Area (GBHMA) which is an additional 4,000 dwellings. The number of dwellings proposed influences what additional school places would be necessary and whether this would take the form of expanding existing local schools and/or the provision of new schools.

The Local Plan should help to ensure that there is sufficient education infrastructure available to mitigate the impact of the proposed new homes in the right place at the right time. SCC would request that land is allocated for educational infrastructure when considering areas for development. Whether this is land adjacent to existing schools, land within a large, proposed development or land within a number of proposed developments.

To mitigate the indicative minimum dwelling numbers in tiers 1-3 villages (including the areas adjacent to neighbouring towns and cities) a total of 632 first school places, 1,067 primary school places, 506 middle school places, 762 secondary school places, 379 high school places and 279 post 16 places are required.

There are a further 288 sites in rural and tier 4 -5 settlements and 450 windfall sites: a total of 738 dwellings. Dependent on location a total of 111 first school places, 155 primary school places, 89 middle school places, 111 secondary school places, 66 high school places and 22 post 16 places are required.

It is appreciated that the Local Plan Review document sets out indicative levels of growth in each area, some mitigation for existing sites has already taken place and we have sought to provide some commentary on the locations for proposed growth at the end of this section. It should be noted that the numbers given above do not include additional Nursery provision or additional SEND provision. Provided below are some general principles that should be considered in the site selection process when determining scale of growth, location of sites and potential policy considerations.

School sizes are referred to in as Forms of Entry (FE), which are the number of classes of 30 per school year group. For example, a 2FE school would have 2 classes of 30 pupils in every year group (60 pupils per school year group). It is also possible for schools to operate at half forms of entry for example 1.5FE equals 45 children per year group, and in these instances, schools operate with classes that are mixed across year groups.

From an educational perspective some schools and governing bodies believe that teaching children from two age groups in one class (mixed age teaching) is beneficial to the pupils. However, there are many educators who don't believe this is the most appropriate method to organise and teach pupils, as it can present challenges due to the differences in ages and abilities which can affect learning outcomes.

Within the district 28 of the 46 schools physically located in the area are Academies or Free Schools, and this number is growing all the time as new free schools open, or maintained schools convert to or become sponsored academies. Academies and Free Schools are independent from the local authority and the Academy Trust would be the decision makers for any proposed expansions.



Irrespective of school governance it is important that the views of schools, Trusts and governing bodies are considered when proposing expansions or new schools, especially where this would require a different class organisation than currently being used. Currently we believe that any options that require a school to organise into mixed age teaching would not be the preferred option by the majority of schools.

A development or a combination of small developments of 750+ dwellings in an area may trigger the need for a new first/primary school and a development of around 5,000 dwellings a new secondary school. A 0.5FE (15 places per year group) expansion to an existing school could be considered for developments of up to 500 dwellings.

Any new first school(s) would need to be at least 1FE (150 places) plus nursery provision and would require land of 7,635m<sup>2</sup> to be provided and allocated within the local plan to facilitate this. To deliver a new 1FE First School (150 places + nursery provision) would cost in the region of £5 million pounds (as at Q4-2020). A 2FE First School (300 places + nursery provision) would require land of 12,870m<sup>2</sup> to be provided and allocated within the local plan to facilitate this and would cost in the region of £6.9 million pounds (as at Q4-2020).

Any new primary schools would need to be at least 1FE (210 places) plus nursery provision and require land of 11,415m<sup>2</sup> to be provided and allocated within the local plan to facilitate this. To deliver a new 1FE Primary School (210 places + nursery provision) would cost in the region of £6,045,195 million pounds (as at Q4-2020). A 2FE Primary School (420 places + nursery provision) would require land of 20,430m<sup>2</sup> to be provided and allocated within the local plan to facilitate this and would cost in the region of £9.5 million pounds (as at Q4-2020).

Any new secondary schools would need to be at least 5FE (750 places) and require land of 86,076m<sup>2</sup> to be provided and allocated within the local plan to facilitate this. To deliver a new secondary school of 5FE would cost in the region of £20 million pounds plus (as at Q4-2020).

The costs above are based on estimated new school costs as at Q4 2020. The building cost multiplier and new school costs are due to be updated and it is anticipated that the estimated cost could increase significantly due to current market conditions. This is a **minimum cost to deliver any new school** and will need to be updated as and when any new school is required.

Where new schools are required the sites would need to be of regular shape, level topography, without significant topographical features that would be considered incongruent with the site's use as a school, free from contamination and other adverse ground conditions, and suitable for the phase of education proposed. Other site requirements will also be required such as (but not limited to) drainage and vehicular access and will be detailed and discussed when appropriate.

Where existing schools have insufficient land to expand on their current site consideration may be given to allocating additional land adjacent to the school to facilitate growth if this is achievable. In addition, any new school proposed may also need to have additional land safeguarded to allow for future growth.

As noted above we will continue to work alongside SSDC to identify the required mitigation for education infrastructure for proposed local plan housing through continued liaison.

Consideration is also required of the implications of proposed housing developments on school transport. Children in the villages/settlements without local schools may be entitled to home to school transport where the catchment or nearest school is over two miles walking distance at primary age or three miles at secondary age, or where there is no available walking route to school. Therefore, there would be additional implications in terms of transport costs, logistics and highway constraints around school sites.

Any proposed development where the catchment and nearest schools are in excess of the walking distances noted above, or where there is no available walking route to access schools, may increase the cost to the public purse for school transport. Consideration must be given to the ongoing costs both to the developer and the public purse of transport costs for pupils living on such developments, and the sustainability and environmental impacts of the site(s). S106 contributions may be required to offset any additional transport costs related to new development. However, SSDC should consider whether growth in such areas is sustainable as ultimately the public purse will pick up the cost of school transport when any developer subsidy ends.

In relation to the preferred areas of growth and the housing allocations for other areas we comment as follows:

#### Proposed Housing Growth – Locality 1

##### Penkridge Town

Provision for 1,217 dwellings, 88 dwellings through allocation of existing safeguarded land and a further 1,129 dwellings as part of the preferred new housing sites in Penkridge.

Penkridge operates a three-tier education system and contains three first schools, one middle school and one high school; the high school serves Penkridge Centre and the wider rural area.

There are 563 dwellings in Penkridge that have been/are being built out or have planning approval. This has resulted in a 0.5FE (75 places) expansion at Princefield First School which is in the process of being completed and a 0.5FE (60 places) expansion at Penkridge Middle which was completed in September 2020.

To mitigate the proposed new housing further educational infrastructure would be required. The new site has a new 1FE (150 places plus nursery provision) First School allocated. This land would need to be at least 7,635m<sup>2</sup>; the costs and details on the requirements for the land are detailed above.

Penkridge Middle School and Wolgarston High School would both require up to 1FE of additional school infrastructure to mitigate the impact of the proposed developments (an additional 120 and 90 places respectively).

#### Southern Edge of Stafford – (A34 corridor)

Provision for 168 dwellings as part of the preferred new housing sites around the southern edge of Stafford along the A34.

For school place planning purposes this site, due to its geographical location fall into Stafford South Primary Cluster and Stafford High School Cluster. Stafford operates a two-tier education system.

The catchment schools are All Saints CE (VA) Primary School (located within the South Staffordshire District boundary) and Walton High School.

Whilst it is expected that the proposed development may be able to be accommodated within the existing school infrastructure at both primary and secondary schools within the local area, further work will need to be undertaken to understand the impact of the combined infrastructure requirements of SSDC's Local Plan and Stafford Borough Council's Local Plan Review

Developer contributions may be required to mitigate the impact of the development.

#### Huntington

Provision for 83 dwellings, 39 dwellings through allocation of existing safeguarded land and a further 44 dwellings as part of the preferred new housing sites in Huntington.

For school place planning purposes these sites, due to their geographical location fall into Cannock 1 Primary Cluster and Cannock High School Cluster. Cannock operates a two-tier education system. The catchment schools are Littleton Green Primary School (located within South Staffordshire District boundary) and Cannock Chase High School.

It is expected that the proposed developments can be accommodated within the existing primary and secondary school infrastructure in Cannock.

#### Proposed Housing Growth – Locality 2

##### Land at Cross Green

Provision for 1,200 dwellings as part of the preferred new housing sites located in Cross Green.

The site at Cross Green has land allocated to provide a new 1FE (210 places plus nursery provision) school at primary phase. This land should be at least 11,415m<sup>2</sup> to facilitate this. However, there may be a requirement for additional infrastructure at primary phase due to the total number of proposed dwellings being built (1,200),



which is higher than the 1,000 dwellings which could be accommodated within a new 1FE school. A site should be safeguarded to facilitate delivery of up to a 1.5FE new school (15,923m<sup>2</sup>) to ensure that the impact of the development can be fully mitigated.

The costs and details for the requirements of the land are detailed above.

Further discussions will need to be held with SCC, SSDC and proposed developers to outline the masterplan for the site so it can inform how the school would be built/opened.

It is expected that this development could be accommodated within existing infrastructure at middle/secondary phase, but further work needs to be completed and additional education infrastructure may still be required.

Transport to secondary education would be required from this site.

#### Brewood

Provision for 106 dwellings, 63 dwellings through allocation of existing safeguarded land and a further 43 dwellings as part of the preferred new housing sites in Brewood. Brewood operates a three-tier education system and contains one first school, one catholic primary and a middle school which serves the wider rural area. Brewood falls into the catchment area of Wolgarston High.

It is expected that the proposed developments can be accommodated within the existing first and middle school infrastructure, but additional infrastructure may be required at Wolgarston High School to mitigate the cumulative impact of the Local Plan dwellings proposed within the school's catchment.

Transport to high school education would be required from these sites.

#### Coven

Provision for 48 dwellings through allocation of existing safeguarded land in Coven. Coven operates a three-tier education system and contains one first school. For Middle and High provision Coven falls into the catchment areas of Brewood Middle and Wolgarston High.

It is expected that the proposed developments can be accommodated within the existing first and middle school infrastructure, but additional infrastructure may be required at Wolgarston High School to mitigate the cumulative impact of the Local Plan dwellings proposed within the school's catchment.

Transport to middle/high school education would be required from this site.

#### Wheaton Aston

Provision for 54 dwellings, 17 dwellings through re-allocated SAD housing allocations and a further 37 dwellings as part of the preferred new housing sites in Wheaton Aston. Wheaton Aston operates a three-tier education system and

contains one first school. For Middle and High provision Wheaton Aston falls into the catchment areas of Brewood Middle and Wolgarston High.

It is expected that the proposed developments can be accommodated within the existing first and middle school infrastructure, but additional infrastructure may be required at Wolgarston High School to mitigate the cumulative impact of the Local Plan dwellings proposed within the school's catchment

Transport to middle/high school education would be required from this site.

### Proposed Housing Growth – Locality 3

#### Cheslyn Hay/Great Wyrley

Provision for 484 dwellings, 153 dwellings through re-allocated SAD housing allocations, 218 dwellings through allocation of existing safeguarded land and a further 113 dwellings as part of the preferred new housing sites in Cheslyn Hay/Great Wyrley.

Cheslyn Hay/Great Wyrley operates a two-tier education system and contains eight primary schools and two secondary schools.

It is expected that the proposed developments can be accommodated within the existing primary and secondary school infrastructure within the Cheslyn Hay/Great Wyrley high school place planning area.

#### Northern Edge of the Black Country (Linthouse Lane)

Provision for 1,976 dwellings as part of the preferred new housing sites located in Cross Green of which 1,200 houses would be delivered within this plan period at land north of Linthouse Lane.

The site at Linthouse Lane has land allocated to provide a new 2FE (420 places plus nursery provision) school at primary phase. This land should be at least 20,430m<sup>2</sup> to facilitate this. The costs and details for the requirements of the land are detailed above.

Further discussions will need to be held with SCC, SSDC and proposed developers to outline the masterplan for the site so it can inform how the school would be built/opened e.g. phased opening up to 2FE.

It is expected that the proposed development can be accommodated within the existing secondary school infrastructure within the Cheslyn Hay/Great Wyrley high school cluster.

Transport to secondary education would be required from this site.

#### Featherstone and Shareshill

Provision for 49 dwellings through allocation of existing safeguarded land in Featherstone. Featherstone operates a two-tier education system and includes two

primary schools and the area falls into the Cheslyn Hay/Great Wyrley High school place planning area.

The proposed development may require additional educational infrastructure at primary phase, but it is expected it can be accommodated with the existing infrastructure at secondary phase.

Transport to secondary education would be required from this site.

#### Proposed Housing Growth – Locality 4

##### Codsall/Bilbrook 1279 dwellings

Provision for 1279 dwellings, 29 dwellings through re-allocated SAD housing allocations, 317 dwellings through allocation of existing safeguarded land and a further 933 dwellings as part of the preferred new housing sites in Codsall/Bilbrook. Codsall/Bilbrook operates a three-tier education system and contains three first schools, one catholic primary, two middle schools and one high school.

There are 421 dwellings in Codsall/Bilbrook that have been/are being built out or have planning approval.

The new site has a new 2FE (300 places plus nursery provision) First School allocated. This land would need to be at least 12,870m<sup>2</sup>, the costs and details on the requirements for the land are detailed above.

Further discussions will need to be held with SCC, SSDC and proposed developers to outline the masterplan for the site so it can inform how the school would be built/opened.

It is expected that the proposed developments can be accommodated within the existing middle school infrastructure within Codsall/Bilbrook but Codsall High School would require additional school infrastructure to mitigate the cumulative impact of the proposed developments within the school's catchment in Codsall/Bilbrook, Perton and Pattingham.

##### Perton

Provision for 150 dwellings through allocation of existing safeguarded land in Perton. Perton operates a three-tier education system and contains two first schools, one middle school and falls into the catchment area of Codsall High School.

It is expected that the proposed developments can be accommodated within the existing first and middle school infrastructure, but additional infrastructure may be required at Codsall High School to mitigate the cumulative impact of the proposed developments within the school's catchment in Codsall/Bilbrook, Perton and Pattingham.

Transport to high school education would be required from this site.

##### Pattingham – 40 dwellings

Provision for 40 dwellings, 18 dwellings through allocation of existing safeguarded land and a further 22 dwellings as part of the preferred new housing sites in Pattingham. Pattingham operates a three-tier education system contains one first schools, and pupils in Pattingham access Codsall Middle Schools and Codsall High School.

It is expected that the proposed developments can be accommodated within the existing first and middle school infrastructure, but additional infrastructure may be required at Codsall High School to mitigate the cumulative impact of the proposed developments within the school's catchment in Codsall/Bilbrook, Perton and Pattingham.

Transport to middle/high school education would be required from these sites.

#### Proposed Housing Growth – Locality 5

##### Wombourne

Provision for 514 dwellings, 275 dwellings through allocation of existing safeguarded land and a further 239 dwellings as part of the preferred new housing sites in Wombourne. Wombourne operates a two-tier education system and contains four primary schools and one secondary school.

The primary schools and secondary school in the area are reaching capacity and additional infrastructure may be required dependent on the timing of future development in this area. SOT would welcome further discussions with SSDC to discuss future housing trajectory expected in this area.

##### Western Edge of the Black Country (Langley Road)

Provision for 390 dwellings as part of the preferred new housing site around the southern edge of Stafford along the A34.

The catchment schools are Bhylls Acre Primary School (located within the City of Wolverhampton boundary) and Wombourne High School.

It is expected that the proposed development can be accommodated within the existing primary school based on expected build out rates of the proposed development. Additional infrastructure may be required at secondary school dependent on the timing of future developments in the school catchment. SOT would welcome further discussions with SSDC to discuss future housing trajectory expected in this area.

Transport to secondary school education may be required from this site.

##### Kinver

Provision for 162 dwellings, 36 dwellings through re-allocated SAD housing allocations, 82 dwellings through allocation of existing safeguarded land and a further 44 dwellings as part of the preferred new housing sites in Kinver. Kinver

operates a two-tier education system contains one infant, one junior school and one secondary school.

It is expected that the proposed development can be accommodated within the existing primary and secondary school infrastructure.

#### Swindon

Provision for 22 dwellings, 11 dwellings through allocation of existing safeguarded land and a further 11 dwellings as part of the preferred new housing sites in Swindon. Swindon operates a two-tier education system and has one primary school and pupils in Swindon can access secondary education at Wombourne/Kinver High School cluster.

It is expected that the proposed development can be accommodated within the existing primary and secondary school infrastructure.

Transport to secondary school education may be required from this site.

#### Proposed Housing Growth - other settlements/tier 5 settlements/windfall sites

There are a further 288 sites in rural and tier 5 settlements and 450 windfall sites: a total of 738 dwellings. Dependent on location a total of 111 first school places, 155 primary school places, 89 middle school places, 111 secondary school places, 66 high school places and 22 post 16 places are required.

As the location and numbers are not known at this time, we would assess the required mitigation (if any) on a site-by-site basis in conjunction with any cumulative impact with other proposed Local Plan sites in the same school place planning area.

#### Aspirations for a new settlement A449/Westcoast mainline (Wolverhampton - Stafford)

Further discussions will need to be held with SSDC and proposed developers to outline the masterplan for the site so it can inform how the schools would be built/opened.

It should be noted that it is unlikely existing secondary education infrastructure can accommodate a large settlement. Careful consideration will therefore need to be given to the impact on secondary education infrastructure, including how any potential new school could be funded, delivered and sustained.

### **Public Health and Care**

The following response has been developed to highlight the Public Health and Wellbeing implications of the local South Staffordshire Preferred Option plan. In addition, we have prepared a 'South Staffs Health Needs Outcomes' document, which is enclosed with this letter. This document should assist in ensuring key health issues are captured and evidenced in the Local Plan.



Theme	Planning issue	Health and wellbeing issue	South Staffordshire Plan Response
<b>Healthy housing</b>	<ul style="list-style-type: none"> <li>• Housing design</li> <li>• Accessible housing</li> <li>• Healthy living</li> <li>• Housing mix and affordability</li> </ul>	<ul style="list-style-type: none"> <li>• Lack of living space - overcrowding</li> <li>• Unhealthy living environment – daylight, ventilation, noise</li> <li>• Excess deaths due to cold / overheating</li> <li>• Injuries in the home</li> <li>• Mental illness from social isolation and fear of crime</li> </ul>	<p>The provision of affordable housing can create mixed and socially inclusive communities. The provision of affordable family sized homes can have a positive impact on the physical and mental health of those living in overcrowded, unsuitable or temporary accommodation. Both affordable and private housing should be designed to this high standard.</p> <p><b>Response:</b> <i>The proposal highlights a clear requirement and tenure split for affordable housing.</i></p>
<b>2. Active travel</b>	<ul style="list-style-type: none"> <li>• Promoting walking and cycling</li> <li>• Safety</li> <li>• Connectivity</li> <li>• Minimising car use</li> </ul>	<ul style="list-style-type: none"> <li>• Physical inactivity, cardiovascular disease and obesity</li> <li>• Road and traffic injuries</li> <li>• Mental illness from social isolation</li> <li>• Noise and air pollution from traffic</li> </ul>	<p>A travel plan can address the environmental and health impacts of development by promoting sustainable transport, including walking and cycling.</p> <p><b>Response:</b> <i>Although the document does not clearly identify an Active Travel Plan, there is identified opportunities for active travel, such as cycling and walking, being planned effectively to support healthy and active lifestyles amongst all sections of the community.</i></p> <p>Traffic management and calming measures and safe crossings can reduce road accidents involving cyclists and pedestrians and increase levels of walking and cycling.</p> <p>Developments should prioritise the access needs of cyclists and pedestrians. Routes should be safe, direct and convenient and barriers</p>

			<p>and gated communities should be avoided. Developments should be accessible by public transport. Space for pedestrians and cyclists should be given priority over commercial and private vehicles. Maximum car parking levels allows for provision to be reduced as far as practicable. Car clubs can be effective in reducing car use and parking demand at new residential developments.</p> <p><b>Response:</b> Opportunities for active travel, such as cycling and walking, are being planned effectively to support healthy and active lifestyles amongst all sections of the community.</p>
<b>3. Healthy environment</b>	<ul style="list-style-type: none"> <li>• Construction</li> <li>• Air quality</li> <li>• Noise</li> <li>• Contaminated land</li> <li>• Open space</li> <li>• Play space</li> <li>• Biodiversity</li> <li>• Local food growing</li> <li>• Flood risk</li> <li>• Overheating</li> </ul>	<ul style="list-style-type: none"> <li>• Disturbance and stress caused by construction activity</li> <li>• Poor air quality - lung and heart disease</li> <li>• Disturbance from noisy activities and uses of equipment</li> <li>• Health risks from toxicity of contaminated land</li> <li>• Physical inactivity, cardiovascular disease and obesity</li> <li>• Mental health benefits from access to nature and green space and water</li> <li>• Opportunities for food growing – active</li> </ul>	<p>Construction activity can cause disturbance and stress, which can have an adverse effect on physical and mental health. Mechanisms should be put in place to control hours of construction, vehicle movements and pollution. Community engagement before and during construction can help alleviate fears and concerns.</p> <p>The long-term impact of poor air quality has also been linked to life-shortening lung and heart conditions, cancer and diabetes which currently has a rate of 81.1% slightly below the UK rate (86.3%) but above the regional rate (78.0%)</p> <p>Reducing noise pollution helps improve the quality of urban life.</p>

		<p>lifestyles, healthy diet and tackling food poverty</p> <ul style="list-style-type: none"> <li>• Excess summer deaths due to overheating</li> </ul>	<p>Access to open space has a positive impact on health and wellbeing. Living close to areas of green space, parks, woodland and other open space can improve physical and mental health regardless of social background.</p> <p>Access to nature and biodiversity contributes to mental health and wellbeing. New development can improve existing, or create new, habitats or use design solutions (green roofs, living walls) to enhance biodiversity.</p> <p><b>Response:</b> <i>The plan proposes to create/enhance multifunctional green spaces and the enhancement of the Green Infrastructure Network, however there is no detail that illustrates how this proposal will address physical inactivity, reduce obesity and use the spaces effectively to reduce Mental Health. There is also no detail in the proposal relating to providing space for local food growing/allotment space, which also helps promote more active lifestyles, better diets and social benefits.</i></p> <p>Regular participation in physical activity among children and young people is vital for healthy growth and development. The location of play spaces should be accessible by walking and cycling routes that are suitable for children to use.</p> <p>South Staffordshire has a higher-than-average prevalence for excess weight in Reception aged school children.</p>
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			<p><b>Response:</b> <i>The Local Plan proposes to provide opportunities to promote a healthy weight environment supporting a Whole System Approach (WSA) to obesity in South Staffordshire and in addition are working as part of a WSA, when planning forms part of a wider approach to addressing obesity.</i></p> <p>Flooding can result in risks to physical and mental health. The stress of being flooded and cleaning up can have a significant impact on mental health and wellbeing. It is likely that increasing development densities and building coverage coupled with more frequent extreme weather events will increase urban flood risk.</p> <p>Parts of Southern Staffordshire are at risk from the following sources: fluvial, surface water, groundwater, sewers, reservoir inundation and canal overtopping/breaches. This study has shown that the most significant sources of flood risk in Southern Staffordshire are fluvial and surface water, (<a href="#">Southern Staffordshire ,Councils Level 1 Strategic Flood Risk Assessment Final Report October 2019</a>)</p> <p><b>Response:</b> <i>The proposal supports radical reductions in greenhouse gas emissions through the community's design, whilst also allowing for changing</i></p>
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			<p>demographics, future growth, and the impacts of climate change including flooding risk. However, it is not clear what the proposed plan is to reduce the risk of fluvial and surface water.</p> <p>Climate change with higher average summer temperatures is likely to intensify the urban heat island effect and result in discomfort and excess summer deaths amongst vulnerable people. Urban greening - tree planting, green roofs and walls and soft landscaping can help prevent summer overheating.</p> <p><b>Response:</b> Although the document does not clearly identify how air quality and climate change will be addressed there does appear to be some planning for the impact of climate change.</p>
<b>4.Vibrant neighbourhood</b>	<ul style="list-style-type: none"> <li>• Healthcare services</li> <li>• Education</li> <li>• Access to social infrastructure</li> <li>• Local employment and healthy workplaces</li> <li>• Access to local food shops</li> <li>• Public buildings and spaces</li> </ul>	<ul style="list-style-type: none"> <li>• Access to services and health inequalities</li> <li>• Mental illness and poor self-esteem associated with unemployment and poverty</li> <li>• Limited access to healthy food linked to obesity and related diseases</li> <li>• Poor environment leading to physical inactivity</li> <li>• Ill health exacerbated through isolation, lack of social contact and fear of crime</li> </ul>	<p>Poor access and quality of healthcare services exacerbates ill health, making effective treatment more difficult. The provision of support services and advice on healthy living can prevent ill health.</p> <p>Access to a range of primary, secondary, and post-19 education improves self-esteem, job opportunities and earning capacity. In South Staffordshire, based on school location, for KS4 English &amp; Maths Grades 9-5 (2019), South Staffordshire did not perform significantly above national and is</p>

		<p>statistically lower than the national average (37%).</p> <p>Good access to local services is a key element of a lifetime neighbourhood and additional services will be required to support new development. Not doing so will place pressure on existing services.</p> <p><b>Response:</b> <i>Since lower educational attainment is linked to areas facing multiple socio-economic inequalities and includes South Staffordshire. It is good to see that the Local Plan Preferred Options document acknowledges some of the key health inequalities such as access to a good range of health services. However, at point "3.2 The strategic policies for an area should include policies and site allocations to address key issues" does not identify 'Health and Wellbeing/Preventative Health measures' as key issues to considered or addressed, as we know that the environment, we live in has a huge impact on our health. Further the evidence base detailed in "Promoting successful and sustainable communities" does not consider this either, particularly as 20.8% of 16+ have a limiting long-term illness (which is above England rate) and 49.4% of 65+ also have limiting long-term illness (above the England rate) that are primarily preventable and could be improved by addressing some of the most significant wider determinants</i></p>
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			<p>of health – those of the built and natural environment. The following evidence could have been considered –</p> <ul style="list-style-type: none"> <li>• Marmot has recently reported on inequalities, and the environment was cited as a key determinant of health and wellbeing. (8) Marmot M. et al. Health equity in England: The Marmot Review 10 years on. London: Institute of Health Equity, 2020.) The report stated that the evidence of the relationships between health and the environment has grown and that the role the environment plays in influencing health is now better understood. Important areas that were covered included: air quality, transport, and housing.</li> <li>• <a href="#">Spatial planning for health: evidence review</a></li> </ul> <p>Unemployment generally leads to poverty, illness and a reduction in personal and social esteem. Employment can aid recovery from physical and mental illnesses. Creating healthier workplaces can reduce ill health and employee sickness absence.</p> <p><b>Response:</b> No evidence seen of how this will be addressed, these issues evident in the proposed plan.</p> <p>Data from <a href="#">NOMIS official Labour Market Profile</a> shows that although the unemployment rate in South Staffordshire of 4.6% is below the West Midlands rate</p>
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			<p>of 5.4% and UK rate of 5.0%. There should be some consideration given to the impact of unemployment as in some neighbourhoods a link can be drawn between the overlap of the spatial patterns of unemployment with the spatial distribution of social housing and socioeconomic problems (<a href="#">The Patterns of Unemployment and the Geography of Social Housing</a>)</p> <p>The public realm has an important role to play in promoting walking and cycling, activity and social interaction. It also affects people's sense of place, security and belonging. It is a key component of a lifetime neighbourhood. Shelter, landscaping, street lighting and seating can make spaces attractive and inviting. Implementing inclusive design principles effectively creates an accessible environment, in particular for disabled and older people.</p> <p><b>Response:</b> <i>The Local Plan Preferred Options document acknowledges inequalities in attainment levels within the district. However, other key health inequalities such as race inequality in housing and disadvantaged communities, are more likely to have less access to good quality open space, easy walking and cycling routes, well located services and good housing mix and design. They are also more likely to experience environmental burdens such as pollution, crime and social isolation which are not clearly addressed.</i></p>
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Staffordshire County Council's Children and Families, Health and Wellbeing Team work closely with partners to drive forward improvements in health outcomes for children, young people and families across Staffordshire.

The County Council's Children and Families Health and Wellbeing Team have three priorities that focus our work: obesity, infant mortality, and mental health.

These priorities are shared within the [Staffordshire Health and Wellbeing Board's Staffordshire Health & Wellbeing Strategy 2018-2023](#).

These priorities are also included in the [Staffordshire Families Strategic Partnership – Staffordshire's Children, Young People and Families Strategy 2018-2028](#). Under the high-level priority 'Happy and Healthy' – *'improve children and families' mental health and emotional wellbeing'* and *'encourage communities to be more active and live healthier lifestyles'* and included. Under the high-level priority 'Safe and Belong' – *'Reduce infant and child mortality rates'* is included.

Appendix 1 contains an evidence base around the key priorities of the County Council's Children & Families, Health & Wellbeing Team (obesity, infant mortality, and mental health).

The County Council and partners have recently commenced work to establish and implement a whole systems approach (WSA) to address obesity and promote a healthy weight, called 'Better Health Staffordshire'. Obesity is a complex problem with multiple causes and significant implications for health and beyond. Tackling such an ingrained problem requires a long-term, system-wide approach that makes obesity everybody's business, tailored to local needs and works across the life course.

The use of the planning system to promote health and reduce inequalities is well established<sup>1</sup>. The Local Plan provides opportunities to promote a healthy weight environment supporting the WSA to obesity in South Staffordshire and Staffordshire. The Local Plan provides opportunity to demonstrate how South Staffordshire District Council, along with the County Council, are working as part of a whole system approach, where planning forms part of a wider approach to addressing obesity.

The Local Plan 'Preferred Options' document includes eight Strategic Objectives, all of which have some relevance to the health and wellbeing of the community.

### Policies

In relation to the policies within the Plan the County Council welcomes the inclusion of Policy HC13 – Health and Wellbeing. This policy should provide the mechanism to address and promote health and wellbeing needs and support healthy communities. It is noted that the precise wording of the Policy is not included in the Preferred Options Plan just a direction of travel. We would be happy to assist in reviewing any draft

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<sup>1</sup> [Using the planning system to promote healthy weight environments \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)



wording ahead of the Publication Plan to ensure Health and Well-Being aspects are well considered.

The requirement for Design and Access Statements for large development (over 150+ dwellings) to demonstrate how specific measures have been designed to have a positive impact on the health and wellbeing of residents is welcome and supported.

The inclusion of a policy hook for a health and wellbeing Supplementary Planning Document (SPD) to provide further detailed guidance on how health and wellbeing benefits will be delivered through specific design interventions is also welcome and to be encouraged. We would be willing to support you in the production of the SPD.

The County Council appreciates the inclusion of Policy DS4 – Longer Term Growth Aspirations for a New Settlement. This sets the parameters for what a new settlement to be delivered would need to incorporate. The inclusion of 'green infrastructure and health' within this framework, where the settlement should be designed to provide choices and changes for all to live a healthy life, offers further opportunity to improve the health and wellbeing needs and opportunities for healthy lifestyles for residents.

### **Adult Social Care**

It is acknowledged that the Plan identifies at Page 18 that meeting the housing needs of the ageing population is an issue to consider. It is also recognised in the same section that it is identified that the Local Plan will need to support the provision of specialist housing requirements of other groups, such as those with disabilities.

Policy HC4 - Homes for Older People sets out the requirements for new development to meet the needs of an ageing population and is supported. It is noted that the examples of general needs properties refer to single floor accommodation. There may be other options that facilitate two-storey accommodation such as through ceiling lifts, well designed stairs with stair lifts. The Plan should also make reference to housing for Older People also needing to be aspirational to encourage older persons to move from existing stock to new housing. Consideration of design and quality also needs to be a factor as well as numbers of units.

Policy HC5 - Specialist Housing Schemes provides support for proposals for specialist housing of all tenures. However, the examples listed in the plan lean towards specialist accommodation for older person e.g. extracare. Whilst this is needed and supported Policy HC5 doesn't appear to address providing for the wider population needs for people with disabilities across all age groups as identified on page 18. In preparing the detailed wording for Policy HC5 it is suggested that consideration is given to the following key Government documents published in late July 2021, which have a bearing on local planning across the full spectrum of disabilities:

- [National Disability Strategy - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/national-disability-strategy) – addressing key barriers faced by disabled people including transport, housing and access to buildings and places.
- [National strategy for autistic children, young people and adults: 2021 to 2026 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/national-strategy-for-autistic-children-young-people-and-adults-2021-to-2026) – Stipulating commitments with regard to supported housing built by the new affordable homes programme

- [Supported housing: national statement of expectations - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/supported-housing-national-statement-of-expectations) - Please also be aware of the following recent publication in relation to Supported Housing provision which covers supported housing provision for all needs:

The National Disability Strategy potentially provides advice and guidance that could be applied wider than Policy HC5 in terms of master planning, site layouts and design.

We may be able to assist later in the Plan period with local data but for now, a good source of data: [Projecting Adult Needs and Service Information System \(pansi.org.uk\)](https://pansi.org.uk/). There is also a link to Poppi data from this which covers the needs of older people and produces forward projections. This will cover a range of disabilities and needs and it generates data by district.

## Ecology

In relation to Q1 the evidence base for the natural environment is appropriate.

Several allocations adjoin designated Biodiversity Alert Sites (BAS) and these will need to ensure the BAS's are buffered / protected and ideally enhanced.

The allocations sites are:

- Adjacent to Merry Hill, Wolverhampton
- Large site to east of Codsall / Bilbrook
- Small site to west of Codsall Station
- Site to west of Brewood

In addition the following site will need to consider onsite habitats:

- Adjacent to Merry Hill, Wolverhampton (onsite ponds and scrub / woodland)

## Landscape

Question 4: Do you support the policy approach in Policy DS1 – Green Belt and Policy DS2 – Open Countryside?

Generally, the policy approach should protect and enhance the Green Belt and Open Countryside. In addition, the policy could consider compensation or carbon offsetting of new development by well-designed tree and woodland planting in the green belt and open countryside where it fits the local landscape character guidelines.

Some areas along the urban conurbation edges could make a significant contribution to the identity of the adjacent settlement edge. New, well planned landscape features could provide valuable boundary features separating urban areas from the surrounding countryside, such as strong woodland belts. The Spatial Strategy could include an innovative Green Infrastructure policy which could be considered hand in hand with site selection options on a strategic level. Such a policy could take an overarching view on climate change, habitat loss and replacement over the whole District. The precedents for this multifunctional approach include the Forest of Mercia and National Forest. Large scale woodland creation could also be seen in the context of the wealth of historic designed parklands throughout South Staffordshire.

Question 5: Do you support the policy approach in Policy DS3 – The Spatial Strategy to 2038?



The 5-tier classification for settlements is appropriate and it appears to achieve the necessary growth in housing and employment needs for the District.

Although it is mentioned in the report, the impact of the planned M6-M54 link road on the District infrastructure and settlements does not seem to have been considered. Additional landscape enhancement of the existing District highway infrastructure could offset the impact of the additional road travel as a result of expanding the Tier 1 and 2 settlements in particular.

The District is unusual in that whilst 80% of the area is in Green Belt and 14% is open countryside; there are significant historic major rural highways such as the A5, A34, A41, A449, A454, A458 and modern motorways including the M6, M54, and the M6Toll. All these roads will experience increased traffic throughout the plan period, and a strategic plan to enhance the setting of the roads by means of tree and woodland planting would help to integrate new development into the changing landscape. Where practical, the new landscape features should be multifunctional and should incorporate measures for active travel such as segregated cycleways, longer distance walking routes, new recreational opportunities, and linked ecological corridors.

The proposed radical changes to farming policies and the effects of the Environment Bill could also be considered in the Preferred Options. The farmed landscape is likely to undergo significant changes during the plan period, and the plan should embrace the change which should benefit both residents and the farming population, as well as the wider environment.

Question 6: Do you support the policy approach in and Policy DS4 – Longer Term Growth Aspirations for a New Settlement?

The Criteria for the siting and design of a new settlement adjacent to the A449 and West Coast Main line are aspirational at this stage it will be necessary to ensure that the settlement fits into the local landscape character in the way that most other settlements in the district have evolved over hundreds of years.

## **Historic Environment**

In general the approach taken with regards to archaeology and the historic environment is supported.

Q1 Do you agree that the evidence base set out in Appendix A is appropriate to inform the new Local Plan? Yes - the evidence based with regards to archaeology and the historic environment, which comprises the existing South Staffordshire Historic Environment Assessment and a Stage 1 Historic Environment Site Assessment (HESA) is considered to be a robust and sufficient evidence base at this stage. The methodology of the HESA, which has been underpinned by a search of the Staffordshire Historic Environment Record (HER), has been developed in consultation with Historic England and the Staffordshire County Council Historic Environment Team, and is sufficiently detailed, and the HESA appears to be mostly (see Q8 below) accurate and well-considered.

Q3 a) Have the correct vision and strategic objectives been identified? Yes- Strategic Objective 13, which relates to 'Enhancing the Historic Environment' is supported and it is welcomed that specific mention is made of the district's canal network

3b) - Do you agree that the draft policies (Chapters 4 and 5) and the policy directions (Chapter 6) will deliver these objectives? AND Q11 Do you agree with the proposed policy approaches set out in Chapter 6?

Yes - The policy directions outlined in Chapter 6 (in particular NB9 and NB10) appear to be sufficiently comprehensive to sustainably deliver these objectives.

Q8 Do you support the proposed housing allocations in Policy SA5? The HESA (and subsequent updates) has done a very useful job in assessing the potential historic environment/archaeological issues for each application. However, it must be noted here that subsequent to the production of the HESA, the Staffordshire Historic Environment Record (HER) has been made aware of a potential Second World War gun battery within part of Site 582 'West of Wolverhampton'. The evidence that has been provided is compelling and it is strongly recommended that the Stage 2 HESA for this site is enhanced to also include an assessment of the significance of this site, preferably with the input of a relevant specialist in this field, and in line with the guidance provided in Historic England's Military Structures Listing Selection Guide (Historic England 2017).

### **Public Rights of Way**

The plan acknowledges that there are *Challenges around increasing cycle and footpath provision for leisure or commuting, including connecting to established routes* (p. 21). Ultimately sustainable travel should be a key element of the plan when looking at sites and should form a primary consideration of decision making when looking at sites and how access to and from them can be improved. There needs to be an aspiration to improve accessibility on the walking and cycling networks (including towpath links) throughout the District.

It is essential that the plan should strive to increase the levels of physical activity and the public rights of way network should be integral to any schemes that are developed to promote this.

The Plan Policies should recognise that any development needs to take appropriate mitigation to ensure the public path network is protected. In addition it should be recognised that there are likely to be many non-definitive routes across proposed development sites which should be considered by any applicants. In many cases these routes could have become rights of way by virtue of established usage over many years and should be treated as public. There will also be sites where such usage or historic evidence has already resulted in applications being made to the County Council under Section 53 of the Wildlife and Countryside Act 1981 to add or modify the Definitive Map of Public Rights of Way, which affects the land in question.

Where development is likely to affect the path network, either directly or indirectly, then section 106 funding and/or appropriate planning conditions improve the path network should be considered and provided for by Plan Policy. Where such instances occur developers should be encouraged to enhance the existing path network where possible in line with Staffordshire County Council's Rights of Way Improvement Plan.

This could include:

- the creation of public bridleways or the upgrading of public footpaths to bridleways to improve provision for horse riders and cyclists across Staffordshire where there is currently a shortfall in available access routes.
- the creation and promotion of short circular walks to promote the health benefits of walking
- the replacement of stiles with gaps (where there are no stock) or gates (where there are) in line with Staffordshire County Council's Least Restrictive Principle for path furniture

## **Flooding and Drainage**

We have provided technical commentary on the sites being considered for allocation during the selection process so will not repeat those comments here.

Policy NB7 - Managing flood risk, sustainable drainage systems & water quality is supported and recognises the previous engagement with SCC in its role as Lead Local Flood Authority. We acknowledge reference in the Plan to the SCC SUDS Handbook in relation to drainage design. We'd like to ensure that this follows through into the final Policy wording to ensure that the SUDS Handbook is a material consideration in Planning decision making to ensure SUDS design, delivery and maintenance is properly addressed in new development.

In addition it would be useful if the supporting text could advise developer that SCC offer a Pre-App advice service and we encourage this practice to be used and has proven extremely useful in recent developments.

## **Digital Connectivity**

It is noted that improving access to suitable broadband and digital communication networks is listed as an Issue/challenge for the Plan. However, thereafter there is no mention of broadband or digital network in the Plan Policies.

Staffordshire County Council, and all the district councils have collaborated for the last eight years in ensuring Staffordshire reaches a high level of superfast broadband coverage. This has enabled 97% of premises to date, to be able to access this increasingly vital service.

Over that period we have seen Local Plans and Neighbourhood Plans with various different policy approaches to ensure new development delivered Superfast Broadband connectivity from the outset. However, during that time we have seen examples of development being built out without digital infrastructure being provided as part of construction and frustrated occupiers not being able to connect to a service. Where such instances occur, the problem is exacerbated by section 58 of the New Roads and Street Works Act 1991. This protects a street from any new excavations following any major surfacing works and can be in place for up to five. So, for newly adopted roads the restriction is in place from the outset meaning broadband providers cannot come in and lay cabling unless they are prepared to undertake full-width reinstatement of the footway, which is cost prohibitive. Hence the importance of installing digital connectivity infrastructure during build out.

Technology does not stand still. As internet applications expand in scale and volume, internet traffic is doubling every two years, meaning that the current limitations of digital connectivity will cease to be fit for purpose within the next ten years i.e. we need to move on from Superfast Broadband. Government is now talking about 'Gigabit Broadband' through the Industrial Strategy. This is delivered by gigabit-capable connections that can provide speeds of over 1000 megabits per second (Mbps). Gigabit-capable connections are often, but not always, delivered by full fibre connections and can also be delivered via technologies such as cable (DOCSIS 3.1) and fixed wireless access. Government approach is technology neutral and does not prescribe the type of technology that must be used, provided that it can provide speeds of over 1000 Mbps. However, for most instances full fibre will be the preferred means of delivery.

Government is clear that the provision of gigabit-capable connectivity to new build developments is crucial. A consultation in 2018 proposed to change building regulations to legislate for all new builds to have gigabit connectivity. However, subsequently the Government has secured commitments from network operators, outlining their commitment to work with housing developers on providing gigabit-capable connections to all new build developments across the UK. Although the exact mix of commercial delivery and publicly subsidised coverage is yet to be defined, results from an Open Market Review (OMR) from DCMS are expected by end of 2021, a common requirement will be facilitating (red carpet approach) wherever possible and practical, the means of operational delivery.

Given the uncertainty over where and when Government may head with Legislative changes what we'd like to work with you and agree suitable Policy drafting to ensure development is catered for by gigabit-capable connectivity. We can also provide signposting to Government and supplier guidance that could feature in the supporting text.

## **Climate Change**

As noted earlier it is acknowledged that climate change is a key theme running through the Plan and is incorporated into a number of policies.

In relation to Policy NB5 - Renewable and low carbon energy generation. It is noted support is given for renewable energy schemes, such as wind and solar. Bullet point 3 provides for general support for on-shore wind and proposes removal of the areas of search set out in the core strategy. Given National Policy for on-shore wind implying sites need to be allocated in a Local Plan to be considered, is it the intention of Policy NB5 that whole of the District is to be considered potentially suitable for wind farm development subject to a criteria based assessment?

It is recognised that Policy NB5 confirms that renewable energy schemes in the green belt may be justified, where very special circumstances can be demonstrated. Given the extent of the Green Belt in the District and the limited location of connection points to the electricity grid will the Plan provide further guidance and/or clarity on what may constitute very special circumstances for Renewable Energy Development?

Yours sincerely

**James Chadwick**

Digitally signed by James  
Chadwick

Date: 2021.12.13 10:01:02 Z

**James Chadwick**  
**Principal Planning Policy Officer**

**Enclosures:**

- Walking & Cycling Proposals (x 11)
- Accessibility Plans (x 7)
- APPENDIX 1 - Evidence Base: Children and Families Health and Wellbeing, Staffordshire County Council
- South Staffs Health Needs Outcomes Nov21



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**Document Element:** Question 1

**Respondent:** South West CCG

**Date received:** 09/12/2021 via Web

**Full text:**

 I agree that the evidence base is set out

**Attachments:** None



**Document Element:** Question 5

**Respondent:** South West CCG

**Date received:** 09/12/2021 via Web

**Full text:**

**Penkridge**

The proposed number of dwellings within Penkridge has the potential to see an additional 1,218 dwellings which could see an additional 3,045 patients (using an average 2.5 people per house calculation). There is one Staffordshire and Stoke on Trent GP Practices located within the area.

Penkridge Medical Practice currently has a patient population of over 10,000 patients. With the potential increase within the local plan this would have significant impact on the practice.

**Cheslyn Hay and Great Wyrley**

The proposed number of dwellings within Cheslyn Hay and Great Wyrley has the potential to see an additional 484 dwellings which could see an additional 1,210 patients (using an average 2.5 people per house calculation). There are five Staffordshire and Stoke on Trent GP Practices located within the area.

High Street Surgery is located within Cheslyn Hay and has a branch surgery within Great Wyrley. The practice is currently struggling from an estates perspective they have limited capacity at both sites and have been looking to extend their Cheslyn Hay site to support with current demand therefore an increase to patient numbers would be difficult for them to manage.

The Nile Practice is located within Cheslyn Hay and has a branch surgery in Cannock Town centre and another in Hednesford. The total registered patient population is over 10,000, the practice work across three small sites and manage current clinical room capacity but any increase would be difficult for them to manage.

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The proposed number of dwellings within Essington has the potential to see an additional 1,976 dwellings which could see an additional 4,940 patients (using an average 2.5 people per house calculation). There is one Staffordshire and Stoke on Trent GP Practices located within the area.

Essington Medical Centre is located within the boundary of this development. While the site is situated on the edge of the Black Country border and patients will flow across the border any additional increase to Essington Medical Centre's patient list will impact on the practice. The practice currently have a patient list size of approx. 2,300 therefore even half of the new patient registrations would double their list therefore requiring additional workforce and additional clinical space.

**Codsall and Bilbrook**

The proposed number of dwellings within Codsall and Bilbrook has the potential to see an additional 1,279 dwellings which could see an additional 3,197 patients (using an average 2.5 people per house calculation). There are two Staffordshire and Stoke on Trent GP Practices located within the area.

The CCG are supportive of the population growth and would like to provide some further detail below on each practice and would ask that the council consult further with the CCG if any of the dwellings within Codsall and Bilbrook area are confirmed so that any funding can be made available to health services.

Bilbrook Medical Centre has seen an increase of patients over the years and from 2019 to date they have seen an additional 550 patients register. The practice and CCG have concerns that if these patient numbers continue to increase that the practice will struggle to meet population needs. At present the practice don't have the clinical capacity within their current building to meet the potential increase of patients.

Russell House Surgery will be moving into the new Codsall Community Centre from February 2022. While this provides the surgery with a new building it does not increase the number of clinical rooms available. Therefore if the practice were to see a high increase of patient numbers they will struggle to meet the demand.

**Wombourne**

The proposed numbers of dwellings within Wombourne has the potential to see an impact on general practice services. There are two Staffordshire and Stoke on Trent CCG GP Practices within the Wombourne area. The local plan outlines a potential for 926 dwellings within the Wombourne area which could see an additional 2,315 patients (using an average 2.5 people per house calculation). Gravel Hill Surgery and Dale Medical Practice are both situated within Wombourne and these sites sit within the catchment boundary of both practices. We do take into consideration that some patients may register cross border into Wolverhampton having an impact on practices.

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Gravel Hill are within a building that is no longer fit for purpose. All clinical capacity is fully utilised whereby the practice are having to ask staff to work off site remotely to free up rooms. This isn't ideal and not the way the practice would like to operate. They have to considered converting a waiting room area into additional clinical rooms in the past but this hasn't been possible to a number of factors.


The practice and CCG do have concerns that if patient numbers continue to increase for Gravel Hill that the practice will be at risk. The



practice now have a registered patient list size of 8,299. The current workforce within the practice are struggling to deliver services and while they are working incredibly hard to do so any further increase will be stretching them too far.

Dale Medical Practice are situated in a building whereby they don't have much scope to create additional clinical capacity within the building. If the practice was to see an increase in patients this would have an impact on their workforce and the practice would need to employ additional staff which would then require the additional space to house these staff.

**Attachments:**  South Staffs Local Plan CCG comments.docx - <https://sstaffs.oc2.uk/a/s4>

*Please note:  files require a system login to access them.*

**Document Element:** Question 8

**Respondent:** South West CCG

**Date received:** 09/12/2021 via Web

**Full text:**

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#### **Attachments:**

 South Staffs Local Plan CCG comments.docx - <https://sstaffs.oc2.uk/a/s5>

Please note:  files require a system login to access them.

## Staffordshire and Stoke on Trent CCGs comments to South Staffs Local Plan

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**Document Element:** Policy MA1 – Masterplanning Strategic Sites

**Respondent:** Staffordshire and Stoke-on-Trent Integrated Care Board

**Date received:** 22/12/2022 via Web

**Full text:**

Sub-paragraph h refers to 'Community facilities' and it would be useful to qualify this with the inclusion of 'healthcare estate' in order that this form of infrastructure is explicitly referenced and considers the potential for on and offsite provision in the same vein as education facilities.

The approach taken in respect of the healthcare estate is to be informed by the ICB's Strategic Estates Plans, which in respect of the primary care network, are scheduled to be updated by June 2023, thereafter capable of informing the masterplanning process for these strategic sites.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Attachments:** None

**Document Element:** Policy HC4: Homes for older people and others with special housing requirements

**Respondent:** Staffordshire and Stoke-on-Trent Integrated Care Board

**Date received:** 22/12/2022 via Web

**Full text:**

Falls are a common, but often overlooked injury and can have huge consequences for the health and wellbeing of older age groups. Statistics suggest that 1 in 3 adults over 65 and half of people over 80 will have at least one fall a year.

The delivery of more accessible and adaptable dwellings will of course go some way to preventing falls within the home and provide a greater degree of independence for an ageing population.

Whilst there is no objection in principle to the objective of supporting specialist forms of accommodation, it should be understood that delivering healthcare within settings such as care homes and extracare facilities requires a collaborative approach between health, social care, voluntary, community and social enterprise sector and care home partners. Research within primary care networks (PCNs) has shown the increased rate of access to care required in such settings is significant.

The NHS Long Term Plan commits to rolling out a model of Enhanced Health in Care Homes across England by 2024, with it starting in 2020 following preparatory requirements, which included every care home being aligned to a PCN, every care home having a named clinical lead. The service requires a weekly 'home round' or 'check in' with residents prioritised for review based on multidisciplinary team clinical judgement and care home advice and requirements for holistic health assessments, personalised care and support plan(s). The model seeks to move away from traditional reactive models of care delivery towards proactive care that is centred on the needs of individual residents, their families and care home staff.

It should be noted that to deliver such services within concentrated locations there will be, in some cases, the need to consider expansion of primary care estate capacity (infrastructure) to accommodate the series of additional roles required to provide the multi-disciplinary team support needed for this service.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Attachments:** None



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**Document Element:** Policy HC14: Health Infrastructure

**Respondent:** Staffordshire and Stoke-on-Trent Integrated Care Board

**Date received:** 22/12/2022 via Web

**Full text:**

Staffordshire and Stoke-on-Trent Integrated Care Board (ICB) would wish to highlight that the term health should not be seen as a closed list restricted to simply primary care infrastructure (GPs) as may be the case by some audiences.

As of the 1 July 2022 the Staffordshire and Stoke-on-Trent Integrated Care System (ICS) was established and formalised as a legal entity with statutory powers and responsibilities. Statutory ICSs are comprised of two key components: integrated care boards and integrated care partnerships. ICSs depend on collaboration and have a focus on places and local populations as the driving forces for improvement.

From the 1 July 2022, the partners of Staffordshire and Stoke-on-Trent's ICS include, inter alia, 25 primary care networks (containing 145 GP practices working across them), 2 major acute hospital trusts, 1 community trust, 2 mental health trusts, 1 ambulance trust and 2 voluntary sector networks.

To deliver the joined-up support required to meet the needs of the local population, it should be noted that infrastructural requirements can span across these partner services and therefore the term health should be understood in this context from both a policy and decision-making perspective.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Attachments:** None

**Appendix G1 – Staffordshire Wildlife Trust Spatial Housing Strategy and Infrastructure  
Delivery Plan Rep.**

12 December 2019

# South Staffordshire Spatial Housing Strategy & Infrastructure Delivery Plan Consultation

## Staffordshire Wildlife Trust

Staffordshire Wildlife Trust is the leading local wildlife charity working to protect and restore wildlife and natural areas in Staffordshire. Our mission is 'To protect and enhance the wildlife and wild places of Staffordshire and to promote understanding, enjoyment and involvement in the natural world by putting wildlife at the heart of everything we do.'

We engage with the planning process at many levels, from strategic plans and large infrastructure projects to individual development sites. Planning for wildlife is a vital part of ensuring that developments are sustainable, liveable and contribute to the restoration of nature and the environment we rely on.

We will comment in the main on biodiversity, but also the wider issues that link to this, such as the 'ecosystem services' provided by natural and other green areas such as: flood management, soil conservation, urban cooling, access to nature and landscape value. These elements can be referred to under the label of 'green infrastructure' or GI. In addition, the methods used for calculating housing numbers required will impact on the areas of land needed for development and future allocations.

## South Staffordshire Spatial Housing Strategy & Infrastructure Delivery document October 2019

### Question 1:

**Do you agree that the evidence base used to inform Spatial Housing Options is robust and proportionate? If not, what else should we consider?**

### Biodiversity and Green Infrastructure Evidence Base

Staffordshire Wildlife Trust does not agree that the evidence base used is robust, with regards to conserving and enhancing biodiversity and green infrastructure.

The National Planning Policy Framework (NPPF) February 2019, and the Planning Practice Guidance (PPG), set out how the natural environment should be considered in plan making and gathering a robust evidence base.

The NPPF paragraphs most relevant to biodiversity in South Staffordshire district include:



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#### Chairman

Richard Higgs

#### Chief Executive

Julian Woolford

Registered Charity No. 259558

Limited Company No. 959609

Registered Office: The Wolseley Centre

Wolseley Bridge, Stafford, ST17 0WT

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170. Planning policies and decisions should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

171. Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

174. To protect and enhance biodiversity and geodiversity, plans should:

- a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
- b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

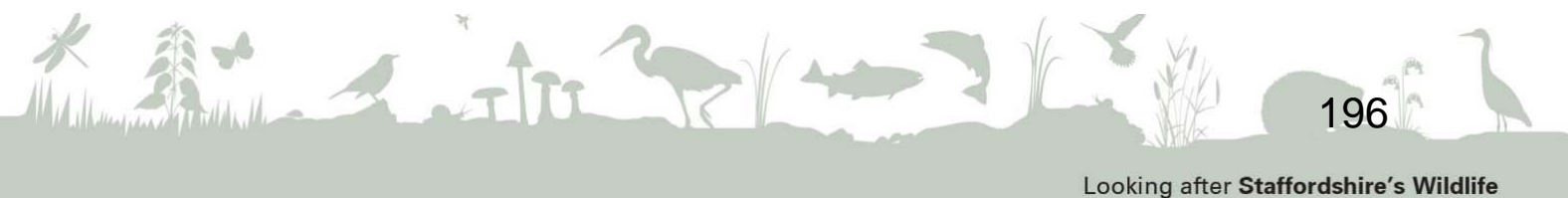
This guidance can be summarised broadly into the need to:

1. Identify, map and safeguard wildlife-rich sites and networks, including the environmental value of potential allocation sites.
2. Recognise natural capital and ecosystem services
3. Minimise impacts to, restore and enhance priority habitats, species and ecological networks.
4. Plan for coherent ecological networks and green infrastructure at a large scale
5. Secure measurable net gains for biodiversity.

The Planning Practice Guidance further sets out the evidence that needs to be taken into account in identifying and mapping local ecological networks. Paragraph: 011 Reference ID: 8-011-20190721 provides a list of relevant evidence, which includes: the location and extent of internationally, nationally and locally designated sites, areas of irreplaceable habitats, distribution of protected and priority habitats and species, landscape features that support species migration such as corridors, areas with potential for habitat enhancement or restoration, audits of green infrastructure, biodiversity and geodiversity value of previously developed land, and areas of geological value.

Paragraph: 013 Reference ID: 8-013-20190721 deals specifically with identifying and safeguarding Local Wildlife Sites, and states that national planning policy expects plans to identify and map these sites. We take this to mean that, as part of preparing a local plan, a planning authority should ensure that LWS are adequately identified and mapped. Other local authorities have undertaken studies to this end, which have updated and increased the number of LWS found and designated.

The evidence base gathered so far to inform the Local Plan does not appear to fulfil the above requirements in the NPPF and Planning Practice Guidance.



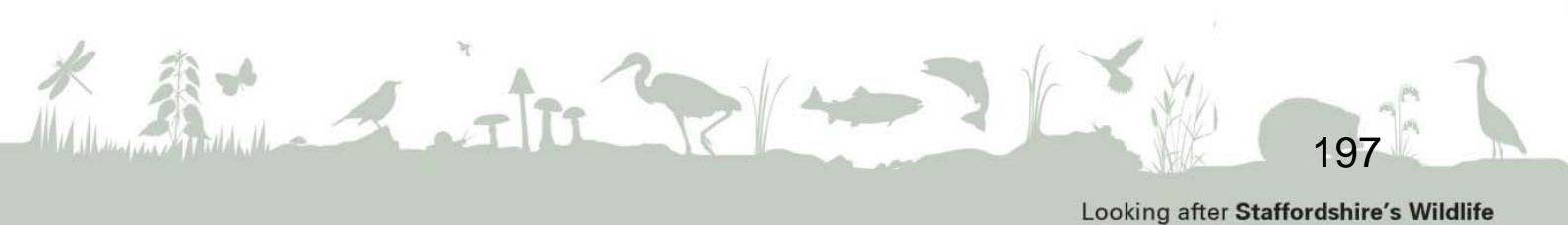
Unfortunately, existing data on Local Wildlife Sites (LWS), irreplaceable and priority habitats for most districts in Staffordshire is substantially out-of-date and is not comprehensive. Every year across the county new LWS are discovered and designated; often due to being threatened by development. Existing sites are often expanded or their designation status changed as survey information is updated. The Ancient Woodland Inventory for England, held by Natural England is only provisional, as most woods under 2 hectares in size have never been assessed, meaning that many small ancient woods have yet to be mapped. To give an example, due to surveys by HS2 Ltd. several newly discovered ancient woodlands have been added to the inventory just within Staffordshire along the line of the proposed rail route, and there are likely to be many more across the county. Habitat survey coverage in South Staffordshire stands at just over 56%. This means that there are many areas of land that have never been assessed but may qualify to be designated as Local Wildlife Sites, or other important habitats.

One example site in the district is Wolverhampton Halfpenny Green Airport, which is thought to be important for breeding and wintering priority birds, particularly breeding snipe – one of the very few breeding sites for this declining bird outside of the moorland areas of Staffordshire. However there is not as yet sufficient data to assess the site for potential designation. Heathland is an important habitat within the district, and there is a need to link isolated sites such as Highgate Common and Kinver Edge to other sites to the north and south. New development could either block, or enable, creation of potential habitat corridors depending where it is located and where/ if corridors are recognised.

If ecological features have not been identified and recognised with adequate baseline data, it is difficult to map the ecological networks and corridors that link these areas. It is then difficult to recognise their value and services, protect, restore or enhance them, or to plan positively for ecological networks at a large scale across and beyond the district. Without a mechanism for measuring losses and gains for biodiversity, it is not easy to secure net gains.

In order to form a robust evidence base and plan for nature at a strategic level, we would recommend that:

1. Where there are gaps in data, Local Wildlife Sites, important habitats and key areas for priority species are identified, mapped and designated where appropriate, in areas where development is likely to take place. For example; safeguarded land and greenbelt potentially to be released, areas of search for significant urban extensions, and area of search for a new settlement.
2. Potential allocation sites are surveyed for ecological and geological constraints to inform site selection at an appropriate stage in the sifting process – this to be specified in the site selection methodology.
3. Brownfield sites are assessed for their environmental value.
4. A local ecological network map or Nature Recovery Network plan is produced to show the current network, and opportunities to create, restore or enhance habitats and connectivity.
5. A Green Infrastructure Strategy be produced, informed by the ecological networks plan and other ecosystem services evidence such as Flood risk and the South Staffordshire Open Space Strategy 2014-2028, to plan where new multifunctional green areas can fill gaps in the existing resources. Costed projects can then be fed into the Infrastructure Delivery Strategy.
6. The council considers adopting policies and methods for securing measurable net gain for biodiversity. These might take the form of biodiversity offsetting as used in Lichfield District, or requirements for habitat creation as adopted in the National Forest to deliver specific habitat targets.



## **Policy and Physical Constraints Paper (Appendix 5)**

We do not feel that natural environment constraints have been fully considered, due to the lack of ecology evidence base and a strategic plan for nature restoration.

The Natural Environment section of the document mentions only statutorily designated wildlife sites such as SSSIs and LNRS –there is no mention of Local Wildlife Sites or ancient woodlands in the district, the distribution of priority habitats and species, or important corridors. No map is provided to show the natural environment constraints. Reference is made to the Staffordshire Biodiversity Action Plan, but not how this would feed into objectives for biodiversity or nature enhancement areas that could be considered in site selection.

As previously stated, the ecology evidence base is not complete, and so further work would be needed in order to consider biodiversity constraints when making site selections. A Nature Recovery Network plan would assist in planning for biodiversity in a strategic way.

## **Sustainability Appraisal**

### **2.7 SEA Topic methodologies and assumptions Objective 3: Biodiversity and Geodiversity**

We are pleased to see that designated sites and priority habitats have been considered, although ancient woodland is the only irreplaceable habitat mentioned- others such as ancient hedges and veteran trees are not included. However, the data for Local Wildlife Sites and other habitats, as we know, is patchy and incomplete. Impacts on priority habitats have been considered using Natural England's publicly available Priority Habitat Inventory database, although it is acknowledged this may not reflect current local site conditions. This database is very incomplete – more data is available from Staffordshire Ecological Record. However as previously stated, there is not comprehensive coverage of habitat data across the district.

The assessment also does not identify or consider key wildlife corridors, or areas for enhancement.

Protected and priority species information has not been obtained from Staffordshire Ecological Record. Even though this is incomplete and skewed in terms of recording effort, it is possible to model and predict species distributions from the habitats present. The report notes that no detailed ecological surveys have been completed by the consultants to inform the assessments made

### **10.1 Overview of spatial options**

The report concludes that all of the 7 spatial options would likely result in a minor negative impact on local biodiversity, pre- mitigation. Without knowing the nature of the land to be impacted, and whether there may be important habitats within these areas that have not yet been identified, it is difficult to see how the spatial options may differ in their impacts.





The recommendations for Biodiversity and Geodiversity are as follows:

- SSDC should implement policies to help avoid adverse impacts associated with development on Motte Meadows SAC and other nearby European designated sites.
- Policies should aim to conserve and enhance the natural environment, protected habitats and species.
- Biodiversity net gain across the plan area should be promoted and at the heart of development.
- SSDC should not promote development which coincides with or is located adjacent to the designated biodiversity asset. Development proposals should not be promoted where adverse impacts on biodiversity assets cannot be mitigated.
- SSDC should develop policies to encourage development to contribute towards the retention and provision of the multifunctional green and blue infrastructure network.
- The findings and conclusion of the Habitats Regulation Assessment (HRA) of the LPR should be incorporated into policies.

We support these recommendations; however they will only be able to be achieved with an adequate baseline data on biodiversity assets, and a green/ blue infrastructure plan.

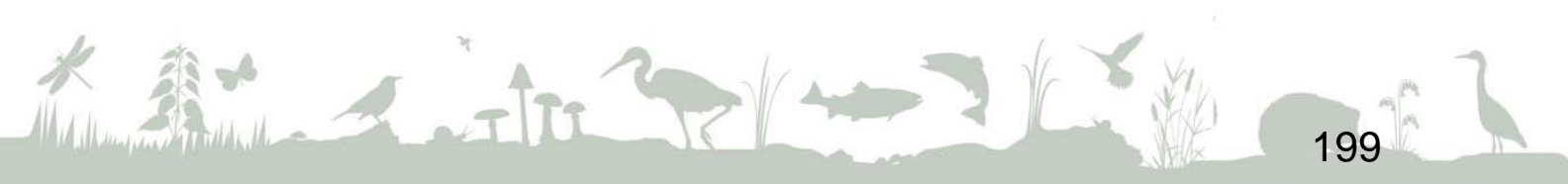
### **Housing Need Figures**

The evidence base used will impact on the Local Plan's housing target, the spatial strategy, as well as the scale of any future release of land from the Green Belt. The following broad themes can be identified:

- (a) Scale of unmet housing need – Is the extent of the unmet cross-boundary housing need justified?
- (b) Future rate of household growth – Latest evidence from the ONS, as well as evidence provided to the Birmingham plan examination, calls into question the robustness of the SHMA's housing growth evidence.
- (c) Economic barriers to migration – When many households are struggling to get onto the housing ladder, how does providing more land where houses are expensive address a housing shortage where houses are cheap?
- (d) An ageing population – Is it a sustainable strategy to allocate 60% of the housing target

There are a number of reasons why the Council's evidence base tends to overstate the unmet housing need across the Greater Birmingham Housing Market Area<sup>1</sup> (GBHMA), thereby creating pressure to set an aggressive housing target to assist neighbouring authorities. These are:

- (a) The 2017 Strategic Housing Needs Assessment (SHMA)<sup>2</sup> [study area: South Staffordshire and the Black Country], highlights a substantial increase in unmet housing needs across the Black County sub-HMA without noting an off-setting fall in the Birmingham sub-HMA. In reality the Black Country HMA's unmet need is part of, not in addition too, the 37,500 homes shortfall, as determined during the Birmingham plan's examination.
- (b) A number of other local authorities have since adopted development plans which set housing targets in excess of the needs set out at the Birmingham plan's examination<sup>3</sup>.
- (c) Latest evidence from the ONS is that household growth is slowing because population growth, which had previously created more households, is now increasingly being absorbed by an increase in household size.



(d) Additional sites have come forward through change of use (to residential), e.g. Rugeley power station, and through successful planning appeals. This has boosted residential land availability. Recent trends in house prices, both in absolute terms and relative to earnings, are shown in Figure 2 below. It is clear that housing is much more expensive in shire authorities like Lichfield and South Staffordshire than it is in Birmingham and the Black Country. Both Lichfield and South Staffordshire have rapidly ageing populations (refer Table 2 above) due to a dramatic reduction in migration from the metropolitan authorities. This is because first time buyers and young families are struggling to afford a mortgage and developers are reluctant to build homes at a faster rate than the market can absorb. Unsurprising migratory pressures have increased in the Black Country – housing is cheaper and public transport is better. This explains why the standardised housing need assessment for Birmingham has fallen while that for the Black Country Authorities have risen. In Lichfield a substantially higher housing target increased land allocated but housing completions fell, compared to the previous decade. It is likely that South Staffordshire will also fail to boost housing deliveries if acceleration land allocations remains the principal policy tool.

South Staffordshire is experiencing a fundamental shift in its demographic. Over the development plan period (2018–2037) the district needs to cater for a substantial increase in the number of pensioners, combined with a fall in the working age population, with the number of school children being broadly stable. The Local Plan needs to address the challenges of an ageing population and high house prices (relative to the Black Country) which is deterring inward migration. This will cause the working age population to contract because there are not enough inwards migrants to offset current residents who will retire over the plan period.

#### **Question 2:**

**Do you agree that taking account of housing land supply from the start of the new plan period (1 April 2018) is the correct approach?**

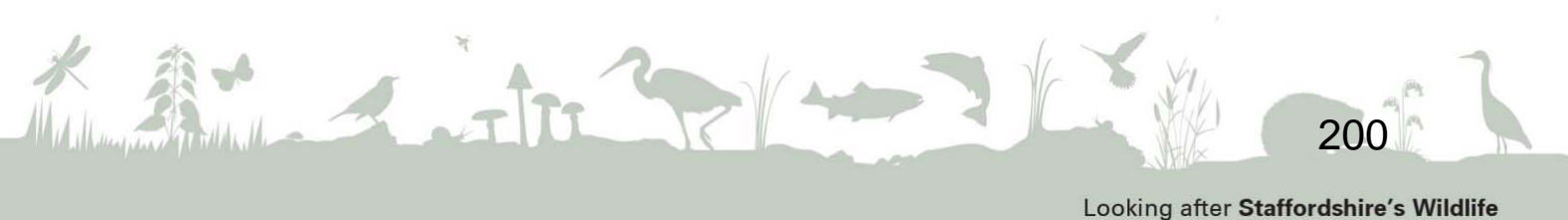
It is likely that the Council will be required to demonstrate a five year housing land supply at the point of adoption. Assuming a plan period of 19 years (2018–2037), a housing target of 480dpa, an adoption date of 2022 and an under historic delivery of homes (2018–2022) of 200dpa, then (using the Liverpool method) the evidence base would have to demonstrate a deliverable housing land supply of around 3,000 homes at adoption, if a 20% buffer was applied. This is quite onerous given that the available land supply per the evidence base was only 1,535 homes at April/2019.

Taking account of housing land supply from the start of the plan period is probably unavoidable. However if a stepped housing trajectory was adopted with a higher housing target during the latter stages of the plan, then it would be easier to pass the housing land supply test at adoption.

#### **Question 4:**

**Are there any other options we should consider?**

The Council could consider a more realistic (deliverable) housing target, combined with a stepped housing trajectory which increases housing targets towards the latter stages of the plan. This would reduce the extent of residential land allocated at the point of adoption and could reduce the release of land from the Green Belt.





#### Question 5:

**Do you agree that the 7 Spatial Housing Options are appropriate options to consider? Are there any alternative options we have not considered?**

We suggest that the appropriateness of the Spatial Housing Options be reconsidered in the light of the additional information (refer Question 1) which we suggest should be added to the evidence base. This is extensive.

We think the plan should address the following specific issues, which may indicate that the Council's preferred strategy (Spatial Housing Option G) is not sustainable:

- (I) Meeting the needs of an **ageing population**. It is generally accepted that ensuring older residents have access to services (GP surgeries, social care, shops, public transport, etc.) is more easily delivered in larger settlements. This calls into question the appropriateness of meeting 60% of the housing target in villages when 80% of the population growth will be persons aged 65+.
- (II) If private sector house building is to be the principal mechanism to meet housing needs, then the plan should address **the limited capacity of supply side policies** (e.g. increased residential land allocations) to boost housing delivery, when economic factors (falling real wages, highly indebted consumers) are restricting demand and capping the capacity of the market to absorb new homes.
- (III) If more inward migration is to be encouraged, especially to help address unmet cross boundary housing needs, then the plan should address the feasibility of **delivering new homes at reasonable prices relative to household incomes** (of inward migrants), i.e. at a substantial discount to prevailing market prices.

#### Question 6:

**Do you agree that Spatial Housing Option G is a robust approach to meet needs in the district and to make a contribution towards unmet needs in the GBHMA?**

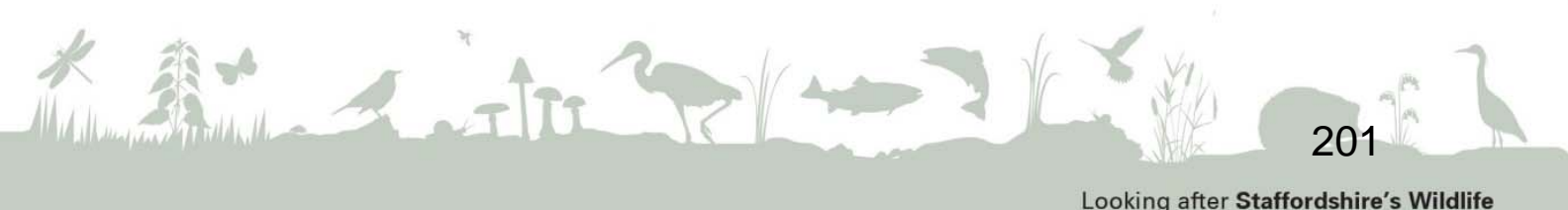
No. Please refer to our responses to question 1 (omissions from the evidence base) and question 5 (appropriate spatial housing options).

- (a) The housing target appears over stated and undeliverable over the plan period;
- (b) The extent of releases of land from the Green Belt may be excessive and are a consequence of the high housing target; and
- (c) The proportion of homes to be delivered in villages is inappropriate given the ageing population.

#### Question 7:

**Do you agree that we should continue to explore options for a new settlement?**

If a sustainable location can be found that has lesser environmental impact and greater opportunities for restoring natural networks than other locations in the district, we feel options for a new settlement should be explored. The environmental constraints of any area or site would need to be adequately considered through the gathering of sufficient evidence, as outlined above.



### Question 8:

#### **What other information (if any) should we consider before concluding that Green Belt release is justified?**

While the Green Belt is a policy measure to prevent urban sprawl by establishing permanent settlement boundaries, it does have an ancillary benefit of protecting habitats within the Green Belt from environmental harm arising from development.

It is national policy that green belt boundaries should only be modified in exceptional circumstances, and that any changes to Green Belt boundaries are capable of enduring beyond the plan period (NPPF). Given comments made elsewhere in this consultation response it is clear that the Wildlife Trust has reservations about both the housing target and the spatial strategy. It follows that we think it will be hard to demonstrate exceptional circumstances for the full extent of the Green Belt land releases that are proposed, although smaller scale land releases are probably inevitable. We hope that once the ecological evidence that is missing from the evidence base (see Question 1) is available, it will play a role in selecting which land areas are released from the Green Belt.

### **Ecology evidence base**

Ecological network information as specified in the NPPF and Planning Practice Guidance needs to be considered. Unless key information on the status of an area is known, such as its designation status, irreplaceability or importance as part of an ecological corridor, it is not possible to judge whether the need for Green Belt release outweighs its importance for wildlife, or for provision of green infrastructure services. Without an adequate evidence base, robust decisions cannot be made, and could undermine the delivery of sustainable development by causing greater impacts than predicted. As well as avoiding potential problems, a good plan for nature and green infrastructure would ensure key opportunities to enhance areas and solve existing issues are not missed.

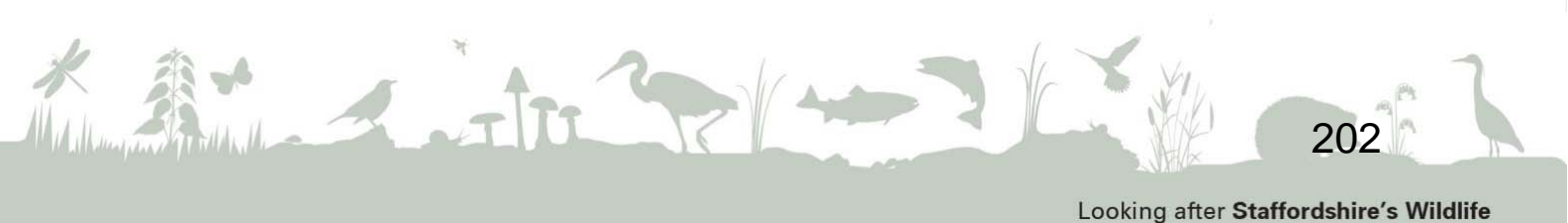
### **Brownfield Sites**

National planning policy requires Green Belt to be released for development only where exceptional circumstances can be demonstrated to justify this approach. This test includes demonstrating that as much use as possible has been made of suitable brownfield sites. We do not feel that the council's Brownfield Register has been informed by adequate assessment of the environmental value of brownfield land, as there is no evidence that we can find which shows any environmental assessments.

*Planning Practice Guidance Paragraph: 003 Reference ID: 8-003-20190721*

#### **How can brownfield land of high environmental value be taken into account?**

*Some previously developed or 'brownfield' land is of high environmental value, providing habitats for protected or priority species and other environmental and amenity benefits. When allocating land for development or determining a planning application, the biodiversity or geodiversity value of the land and its environmental sensitivity will need to be taken into account so that any harm can be avoided, mitigated or compensated for in a way which is appropriate given the site's identified value.*



Regulation 4 of the Town and Country Planning (Brownfield Land Register) Regulations 2017 sets out the criteria against which sites should be assessed. One criteria is that sites must be “suitable for residential development”, which means that the land at the entry date meets a number of conditions. One is that the land is, in the opinion of the local planning authority, appropriate for residential development, having regard to any adverse impact on the natural environment. It is not clear whether impact to the natural environment have been considered.

Some sites on the register also appear to include greenfield land, such as the site at Boulton Lane, Saredon.

#### **Question 9:**

**Have we identified the key criteria for the identification of sites (as set out in Appendix 6)? Are there any other factors we should consider?**

#### **Site Selection Methodology for Preferred Options (Appendix 6)**

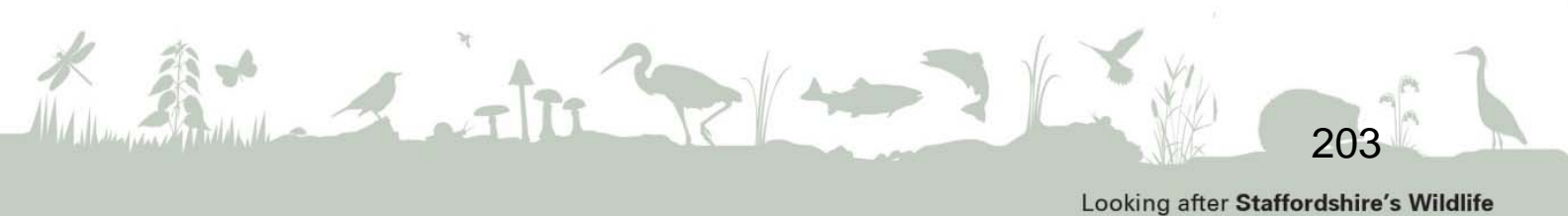
This document states that a number of factors may influence how suitable a site is to accommodate a planned level of growth and that the Council will consider any site constraints including:

Natural environment constraints (e.g. designated or non-designated wildlife sites, agricultural land classification, AONB, SAC)

As outlined above, baseline data for designated wildlife Sites, important habitats and ecological networks is not complete. Therefore the environmental constraints for any given site may not be fully known or considered during site selection, unless up-to-date information is gathered.

Natural environment constraints should, however, also include factors other than designated sites. In order to achieve a net gain for biodiversity, a development must balance impacts to all habitats and species affected, by adequately avoiding, mitigating and compensating for biodiversity loss at the site scale. This must be done either by retaining enough natural areas within the site that can be improved, or by providing mitigation elsewhere off-site. Any avoidance, mitigation or compensation required may reduce the capacity of a site to be developed, or its viability when the costs of mitigation are included. Therefore the presence of irreplaceable and priority habitats, important species and critical wildlife corridors need to be factored in as potential constraints. Without this information, sites may be wrongly selected as sustainable, or their capacity for housing over-estimated. This would affect both the accuracy of predicted housing numbers supplied, and the deliverability of a site at application stage.

We therefore recommend that all ecological and geological constraints likely to impact on the housing capacity of sites are identified as part of the site selection process



**Do you agree that, when selecting sites to deliver the preferred spatial housing strategy, the Council should seek to avoid allocating housing sites that would result in very high Green Belt harm wherever possible?**

## Infrastructure Delivery Plan (IDP) 2019

Biodiversity offsetting methods are another way that biodiversity mitigation and enhancement can be funded. Other sources, such as carbon offsetting or habitat recovery funding could also be investigated. Partnership projects are often a good way to draw in various funding sources to deliver green infrastructure. Producing a nature recovery network map and green infrastructure strategy would be essential to steer and inform the delivery of green infrastructure.

This section is relatively short, and does not appear to be supported by any up-to-date studies into biodiversity assets or whether the current situation is adequate in terms of a healthy functioning ecological network. However we welcome the mention that mechanisms for biodiversity offsetting and environmental net gain will need to be explored through the Local Plan.



## Appendix A - Baseline infrastructure projects

The number of green infrastructure projects is very much dwarfed by the number of school, highways, transport and drainage projects. Given the demographic evidence regarding the high proportion of the population growth which will be represented by people aged 65+ , we feel it is doubtful whether the extent of proposed spending on schools and highways is justified. GI outcomes could also be incorporated into many of these projects, especially natural flood and drainage management methods.

Specific green infrastructure projects listed are limited to council owned Local Nature Reserves, two large development sites, allotments and canals. Most of these are to provide better access and amenities for people – very little biodiversity enhancement is mentioned. Principles within national guidance to establish coherent ecological networks that increase, enhance, expand and link nature conservation sites and are not considered. No GI or biodiversity projects are included in Appendix B – Other infrastructure concerns requiring further investigation.

Due to the lack of an overarching nature recovery network plan or GI strategy that considers the needs and opportunities at a district and wider scale, key GI issues have not been included for delivery. We feel that the district would benefit from a wider and more holistic integration of GI into its infrastructure plans.

**Kate Dewey BSc (Hons) MCIEEM**

## Senior Planning Officer





**Document Element:** Question 1**Respondent:** Staffordshire Wildlife Trust**Date received:** 13/12/2021 via Web**Full text:**

There are a number of additional elements that would enable the plan to deliver the requirements of national policy, and better achieve environmental net gain.

A Local Nature Recovery Strategy would build on the Nature Recovery Network mapping evidence base to provide policy and firm actions to deliver biodiversity enhancements in key locations, where they will also provide nature-based solutions and benefits for people. Currently, the plan does not fully 'take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.' as advised by the National Planning Policy Framework and Planning Practice Guidance.

A Green Infrastructure Strategy would also be very useful to bring together a range of issues such as biodiversity, flood management, access to nature, recreation, landscape and heritage into an integrated multi-functional plan, which could then be delivered through the IDP.

Access to nature, on the doorstep and further afield, is central to our wellbeing both mentally and physically. An audit and mapping of Accessible Natural Greenspace, in line with standards published by Natural England, should be undertaken to show where deficits or opportunities lie. This would aid site allocation decisions and green infrastructure planning.

Further work is needed to identify site-specific ecological constraints and opportunities, as information on allocation sites is currently not sufficient to make informed and accurate decisions on site selection, net developable area achievable, and viability.

**Ecology Evidence Base**

While the current evidence base displays the primary ecology evidence available to date, new requirements in national policy, progress in mapping analysis and the need for site-specific decision making means that ongoing work is required to build on the current evidence. required for strategic policy, and to inform local allocations. We have considered the NPPF and Planning Practice Guidance, as well as the recently passed Environment Bill in forming our comments.

**Wildlife corridors and stepping stones connecting designated sites**

The South Staffordshire Nature Recovery Network Mapping Report 2020 opportunity maps show large scale corridors and stepping stones, and strategic habitat creation areas. However, clearer key corridors, that could be a focus for specific policies, could be drawn out by producing a Habitat Corridors Map. This would also enable site-specific decisions to be informed by potential impacts, or benefits to, important corridors.

**Distribution of protected and priority habitats and species**

Known priority habitats have been mapped; however data is not necessarily complete for the whole district, and where this information is critical to site-specific or policy decisions, further survey is advised to ensure all priority habitats have been identified.

Priority species are part of the NRN mapping, and are included in some habitat distinctiveness definitions; however it may be valuable to use species data further, to highlight areas of special significance e.g. for priority farmland birds, reptiles and invertebrates which are all key features of the district.

**Irreplaceable habitats**

Not all irreplaceable habitats (IH) have yet been identified across Staffordshire, for example work is ongoing to update data on smaller ancient woodlands that are not yet recorded on the national register. Veteran trees are also not comprehensively mapped, but could be included in the evidence base. Other habitats such as lowland fen and peatlands would potentially also qualify as irreplaceable, and could be highlighted more strongly within the mapping. Updated guidance from Natural England on how to define, and therefore identify, irreplaceable habitats is expected in 2022, and the LPA should be prepared that additional data collection may be needed to ensure these habitats are recognised and avoided in critical locations. This is particularly important as IH cannot be included in biodiversity net gain.

**Areas of geological value which would benefit from enhancement and management**

Important geological sites are not covered specifically within the NRN mapping, or within the landscape or historic evidence base, although some may overlap with designated wildlife sites. Geodiversity is an important element in understanding the landscape and history of an area, and can coincide with important habitats, so gathering an appropriate evidence base should be considered.

**Areas identified by national and local partnerships for habitat management, enhancement, restoration or creation**

The evidence base would benefit from including local partnership projects e.g. Heathland/ Sandland project area connecting Kinver Edge SSSI with Highgate Common SSSI, involving SWT, the National Trust and Natural England. The River Penk corridor is also an area of focus for natural flood management. There are likely to be many initiatives ongoing of varying size amongst partners. As part of a Local Nature Recovery Strategy, such areas could be and supported via plan policies and infrastructure delivery.



### Allocate land with the least environmental or amenity value

While the current evidence base gives some indication of the value of specific sites within the nature network, and known/ likely distinctiveness, this mapping was designed to identify broad priorities and areas for BNG. It can help inform site selection, but does not provide sufficient evidence for specific sites. Not all priority habitats or sites worthy of designation have been identified across the district, and so further data on specific site constraints is required in order that decisions are fully informed.

### Measureable Net Biodiversity Gain (BNG)

Current national guidance sets out a number of aspects required to achieve BNG; this will also be updated in light of the Environment Bill. This means that evidence base to enable BNG will need to be extended and further detail added.

Plans should: Set out which areas have best opportunities to deliver gains; consider local sites including where communities could benefit from improved access to nature; identify and pursue opportunities for securing measurable net gains for biodiversity.

Strategic habitat creation areas have been broadly identified, but could be further honed to select priority areas for enhancement. Some feasible sites have been identified (Tier 1 and 2 sites), but while good potential opportunities, the local wildlife sites listed in Tier 3 list have not been pursued in terms of securing permission/ agreement.

A register of available and suitable sites for BNG is needed. To engage landowners and find available sites we would recommend the LPA carry out a call for nature sites. The South Downs National Park Authority is a good example.

<https://www.southdowns.gov.uk/nature-recovery-information-for-delivery-partners/call-for-nature-sites/>

Land between and around designated sites would be another priority for most gain and connectivity. Potential peatland restoration sites would also be a high priority as offsetting sites, and carbon capture. A register would also need to measure the biodiversity units potentially provided by sites.

### Open Space Assessment and Standards Paper (LP)

Open space provision is assessed against Fields In Trust guidance (2015), which recommends that everyone should live within 720m of a natural or semi-natural greenspace and that there are a minimum of 1.8 hectares of natural or semi-natural greenspace per 1,000 population.

The report finds that South Staffs has 5.08 hectares of accessible natural and semi-natural greenspace per 1,000 population.

A map has been produced (Fig 5.1) highlighting the areas which meet the recommended 720m accessibility guideline.

The map appears to show that a significant proportion of the urban population are not within the 720m threshold for access to natural and semi-natural greenspace. However, in the Open Space Standards Paper, these shortfalls are not acknowledged. In the Accessibility Summary tables, the report states that there are largely no gaps in provision, which does not seem to tally up with the evidence in the map.

Each natural and semi-natural greenspace has been audited and rated using a 'quality' and 'value' measurement. Quality has been assessed on Green Flag criteria, which may not be relevant to assessing natural greenspaces.

The information on how value is assessed is quite broad - for example, 'ecological benefits' is listed as one of the factors for assessing value. However, there is little information on how ecological benefits are measured/quantified. It is not clear how Green corridors have been identified.

There is no mention of the NRN mapping being used in the site audits for natural and semi natural greenspaces.

In conclusion, we feel that the current open space evidence base has not fully investigated access to nature, or used this information to inform policy or strategic decisions. We recommend that Natural England's Accessible Natural Greenspace Standards are more robust guidelines, and that an audit of the resource should be undertaken to highlight any deficits in provision. Actions to remedy this, such as improving access to inaccessible natural areas, naturalising existing green sites, and creating new green spaces, should be part of a nature recover or GI strategy and delivered through an updated IDP.

### Local Green Spaces Topic Paper 2021 (LP)

The assessment criteria could be improved for deciding on whether to designate a Local Green Space, by also considering: whether the site meets any gaps in accessible natural greenspace provision in line with Natural England guidelines; whether the site could be a potential offsetting site to provide BNG, and whether it is in a wildlife corridor.

### Housing Site Selection Topic Paper 2021

The paper does not provide clear information to ensure understanding of development impacts on nature and on local communities. There is no section on nature recovery or impact on natural environment under 3. 'How housing site options were assessed' - ecology has been dealt with as a site constraint, without considering strategic objectives such as the potential impact of allocation sites relative to NRN opportunities or key habitat corridors.

The Council has considered a variety of site constraints through the site survey process that may shape or prevent the delivery of employment land on a site.-

Natural environment constraints (e.g. contains or is adjacent to designated or non-designated wildlife sites, AONB, SAC). Identified areas of high or very high habitat distinctiveness in the 2020 South Staffordshire District Nature Recovery Network (NRN) Mapping, which this document indicates should be a priority for protection and expansion within the local plan.

The use of the habitat distinctiveness map in the NRN report is not appropriate, as this mapping is to show patterns only and highlight areas that may need further investigation. The selection process assumes that all areas of high value have been identified, which does not consider the constraints of the data and whether data is up to date or accurate for specific sites. Some site-specific elements are considered but only 'known constraints'- no new habitat information has to our knowledge been gathered for allocation sites.



The assessment methodology needs sufficient environmental evidence on site-specific constraints to determine the scale of development possible. The following could impact on the viability of the site, or constrain the net developable area/numbers of homes deliverable, and therefore would need consideration prior to allocation:

1. Whether any parts of the site are priority or irreplaceable habitats, or meet criteria for Local Wildlife Site designation, and therefore require avoidance / retention in situ in the first instance.
2. The need to provide adequate buffers and links to existing LWS/ priority habitats adjacent.
3. The presence of protected and priority species that may need areas retained for mitigation
4. Sufficient space outside of floodplains for effective SuDs
5. Sufficient greenspace in the right location to address any deficits in the area.
6. Availability and cost of land on or off-site to achieve at least 10% biodiversity net gain.

Proposed allocation sites where biodiversity issues are not fully clear require a more detailed targeted 'Stage 2' assessment to ensure all constraints are recognised.

#### Brownfield Land Register

This lists brownfield sites in the district and their status in terms of development, but we cannot find any evidence as to their environmental value. Many previously developed sites have high wildlife value. The NPPF advises that relevant evidence that needs to be taken into account in identifying and mapping local ecological networks includes 'information on the biodiversity and geodiversity value of previously developed land and the opportunities for incorporating this in developments'. We recommend therefore that all brownfield sites are assessed for their environmental value.

**Attachments:** None

**Document Element:** Question 2

**Respondent:** Staffordshire Wildlife Trust

**Date received:** 13/12/2021 via Web

**Full text:**

We do not agree that all appropriate infrastructure has been identified in the IDP. Local Wildlife Sites are not mentioned under the Green Infrastructure section of the report. Although biodiversity net gain is mentioned, there is no quantification of the amount of land needed to be provided as green space, or offsetting sites, to provide 10% net gain for the predicted allocation sites. Without information on the current value of habitats and predicted impacts, it is not possible to tell whether enough GI or habitat areas would be provided, and the cost of these.

The table of Baseline infrastructure projects does not include any of the new GI areas proposed alongside development allocations, or the Tier 1 and 2 sites indicated in the NRN mapping report as available for biodiversity offsetting.

The IDP needs to deliver a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

**Attachments:** None

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**Document Element:** Question 2

**Respondent:** Staffordshire Wildlife Trust

**Date received:** 13/12/2021 via Web

**Full text:**

Yes, other infrastructure is needed. Flood management proposals need to consider catchment-based approaches that spread and slow water higher in the system, rather than just costly flood mitigation schemes. There is no mention of sustainable drainage, or retrofitting nature-based solutions to tackle flooding or the issue of combined sewer overflows

**Attachments:** None

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**Document Element:** Question 3

**Respondent:** Staffordshire Wildlife Trust

**Date received:** 13/12/2021 via Web

**Full text:**

Strategic Objective 11- Protecting and enhancing the natural environment

This should also mention strengthening ecological networks and environmental capital/ ecosystem services.

A Local Nature Recovery Strategy and Green infrastructure Strategy would more clearly set out strategic aims.

Strategic Objective 12- Climate Change and sustainable development

This should also include measures to sequester carbon through nature-based solutions such as habitat restoration and increasing soil carbon.

**Attachments:** None

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**Document Element:** Question 4

**Respondent:** Staffordshire Wildlife Trust

**Date received:** 13/12/2021 via Web

**Full text:**

**Policy DS1 – Green Belt**

Greenbelt, as a primarily landscape designation, is not concerned with biodiversity, and does not necessarily align with wildlife-rich habitats; the ecology network crosses town and countryside. Impacts, and benefits, to nature can occur on green and brownfield sites, and the key is where a site sits in the ecological network. However the green belt is important for access to nature and can play a role in linking wildlife sites.

We welcome the statement that any Green belt release would include compensatory improvements to the environmental quality and accessibility of remaining Green Belt, including improving access to the countryside and ecological and biodiversity enhancement.

However, any decision to release a site needs to be informed by environmental constraints and opportunities in that area, including any deficit or barriers existing currently with regards to access to nature. Therefore we recommend that further studies are carried out to establish an accessible natural greenspace baseline, and any site-specific GI needs for these areas.

**Policy DS2 – Open Countryside**

We support efforts to maintain the character and sensitive assets of rural areas.

While the above policies seek to protect areas largely in terms of their landscape, there are no policies for particular areas to be protected and enhanced for nature's recovery. The plan should consider selecting key nature recovery areas, 'Wildbelts', as part of a Local Nature Recovery Strategy, where specific policies are applied to prevent harm and deliver higher enhancement and particular objectives. For example, a river corridor, or a new wooded zone could be designated, to achieve outcomes over the plan period, such as wetland creation and flood management, or a % increase in tree cover.

Good access is key for those living, working and visiting the green belt and rural areas. The plans should consider how footpaths, bridleways and cycle routes, as well as adequate parking, can be improved in rural areas to enable sustainable access and recreation.

**Attachments:** None

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**Document Element:** Question 5

**Respondent:** Staffordshire Wildlife Trust

**Date received:** 13/12/2021 via Web

**Full text:**

The current policy approach is infrastructure lead, focussing new development in settlements with more 'hard' infrastructure and facilities. This does not consider environmental limits, such as landscape boundaries, flooding, water scarcity, best and most versatile agricultural soils, ecological sensitivity or other factors relevant to the capacity of the environment to cope with increased development.

Thought should be given to the sustainability of smaller settlements in terms of the 'critical mass' of residents required to sustain shops and services, and the potential opportunities for carefully designed development to improve facilities in rural areas, rather than overloading already large villages and towns.

**Attachments:** None

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**Document Element:** Question 6

**Respondent:** Staffordshire Wildlife Trust

**Date received:** 13/12/2021 via Web

**Full text:**

This would depend where a new settlement were to be located within a nature recovery network and whether it would enhance it and contribute to biodiversity objectives. A new settlement could provide opportunities to create new habitats and achieve net gain, if located on less environmentally valuable land.

Potential sites should be checked against the NRN map to see whether they fall within critical habitat corridors, and whether this would be an issue, or opportunity, for the network. Appropriate survey of sites for ecological constraints should be carried out before decisions are made as to capacity and suitability for development.

**Attachments:** None

**Document Element:** Question 7

**Respondent:** Staffordshire Wildlife Trust

**Date received:** 13/12/2021 via Web

**Full text:**

We neither support nor object to the strategic housing allocations, as the impacts to biodiversity are not currently known. It is not clear that all important wildlife habitats have been identified for avoidance, that 10% BNG would be achievable, or that sites are appropriate in terms of protecting or enhancing key habitat corridors.

It is not clear whether the green infrastructure allocations are sufficient to address any deficits in accessible natural greenspace, in line with Natural England's standards. Or, whether these areas are in the best locations, to effectively enhance ecological networks. All sites need further assessment for ecological constraints and against the NRN map to determine how they would interact with the nature recovery network.

**SA1- Land East of Bilbrook**

SWT welcomes the aim to provide good GI and biodiversity net gain. It is hard to judge whether this would be possible within the site as there is no information on the current habitat value, or whether sufficient green areas would be retained for required enhancement. The proposed off-site GI is on land that appears to already support semi-natural habitats. While its location in an obvious habitat corridor is good, it may not provide much uplift in biodiversity value if it is already of high diversity. More land may be needed to deliver all the GI provisions required.

**SA2 – Land at Cross Green**

The sites appear to be largely low-diversity grassland. The proposed green infrastructure includes areas of what appears to be more species-rich damp grassland. The GI areas do not look large enough to provide BNG for the allocation sites; more habitat will be needed within the sites themselves and the capacity should be estimated before allocation.

**SA3 – Land North of Linthouse Lane**

This site is arable land, and the GI area proposed, as well as GI within the site, would likely be able to deliver BNG. A local wildlife site runs through the area along the disused railway line forming a habitat corridor. Farmland priority birds may require mitigation for loss of open habitat.

**SA4 – Land North of Penkridge**

Welcome proposed country park along River Penk. It is not clear how much GI would be needed to deliver BNG.

Yes, we agree that any strategic allocation site should have its own policy. This needs to be informed by sufficient information on ecology constraints and opportunities, to enable key assets to be protected, net gain to be provided and existing nature networks strengthened in line with the Nature Recovery Network map.

**Attachments:** None



**Document Element:** Question 8**Respondent:** Staffordshire Wildlife Trust**Date received:** 13/12/2021 via Web**Full text:**

We neither support nor object to the proposed housing allocations, as it is not currently possible to determine the impact to biodiversity, whether 10% net gain can be delivered, or whether the sites are appropriate in terms of protecting or enhancing key habitat corridors.

No green infrastructure is proposed alongside these smaller sites. Some settlements, for example Wombourne, have several proposed allocations which add up to large areas of land. New GI will be necessary in many areas to achieve BNG and will either require greenspace on the sites, or offsite- this needs to be factored in to the housing capacity and viability. It is not clear whether current open spaces in these settlements are sufficient to meet Natural England's accessible natural greenspace standards, and how additional proposed allocations will affect this.

Biodiversity or environmental net gain is not mentioned in the proformas under Key infrastructure requirements.

Due to potential allocation sites having been assessed against current habitat distinctiveness mapping only, and this map having clear constraints in terms of the accuracy of data for specific sites due to it being based on available desk-based and no up-to-date ground survey of sites, some sites are of higher distinctiveness than currently recorded. Therefore, a number of sites which could have significant impacts to biodiversity have been selected. We do not have the capacity to assess every proposed allocation, but wish to highlight some examples where we feel that biodiversity needs further consideration, and where additional information is required to inform decision making. This could apply to other allocation sites. Accurate information on the value of the site for wildlife is important to ensure accurate housing numbers are proposed, and avoid future issues with delivery or viability.

We recommend that a further 'layer' of assessment is carried out, to identify sites that need additional more detailed targeted 'Stage 2' assessment of the ecology baseline, and that this is carried out before final allocations are made.

**Codsall - 224 Land adjacent to Station Road**

Much of the site, around two thirds, experiences surface water flooding, which may limit the areas available for development. SuDs will be needed. The site is within a wetland opportunity area in the NRN map. A Local Wildlife Site lies adjacent to the south, which will require a buffer. The western end of the site links this site with another Local Wildlife Site to the north- this area is also the most flood-prone and contains two watercourses. Allocation of green infrastructure is advisable on this part of the site to help link existing habitats and manage surface water, as well as help deliver net gain. The site should be subject to further assessment of environmental constraints, as it appears unlikely that the stated minimum capacity of 85 dwellings could be sustainably delivered.

**Kinver- 274 Land South of White Hill**

The site is next to a key heathland opportunity area/habitat corridor linking Kinver Edge SSSI with Highgate Common SSSI, which is narrow at this location and which the plan should seek to strengthen and enhance. Part of the allocation site is recorded as an historic Local Wildlife Site, which also extends adjacent the site to the west. The habitats were assessed as valuable in the 80's but have not been assessed to the current LWS criteria. Having recently visited the site however, remnants of heathland and acid grassland habitats are present. Parts of the site support priority habitats and are likely to qualify as a LWS, so require up-to-date survey. This area could be categorised as High Distinctiveness after further assessment. Protected species are also present and would require mitigation. An adequate buffer to LWS areas, provision for biodiversity net gain, sustainable drainage and natural green space all need consideration, and could affect the layout and capacity of the site. Further information should be gathered to inform a decision on allocation, and housing numbers.

**Huntington- 591 Land at Oaklands Farm (north of Limepit Lane)**

This site appears to be semi-natural habitat and will require further survey to determine its value. It would require a significant proportion of the site to be retained to achieve BNG, or an compensation area offsite. This would need to be factored into the delivery of the proposed 44 houses.

**582 - North of Langley Road (adjoining City of Wolverhampton boundary)**

Around a third of this site appears to be potential semi-natural habitat, which was previously designated as a local wildlife site, but has not been assessed to current criteria. There are also natural waterbodies. Priority habitats could be present. The site needs more detailed assessment before allocation, as habitats may need to be avoided and overall, the site would need areas of GI or off-site habitat compensation to achieve BNG.

**Attachments:** None


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**Document Element:** Question 9

**Respondent:** Staffordshire Wildlife Trust

**Date received:** 13/12/2021 via Web

**Full text:**

 Please see comments for Q8- more ecology evidence is needed to check sites are appropriate.

**Attachments:** None

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**Document Element:** Question 10

**Respondent:** Staffordshire Wildlife Trust

**Date received:** 13/12/2021 via Web

**Full text:**

The Secretary of State has granted development consent for the West Midlands Interchange, and the area includes green infrastructure. The project, however, has not been assessed in terms of biodiversity net gain, which will be mandatory for all sites including major infrastructure projects. We would recommend that before allocation, it should be determined whether the proposals would provide a 10% net gain, and whether any additional provisions may be required alongside the allocation to achieve this.

**Attachments:** None

**Document Element:** Question 11

**Respondent:** Staffordshire Wildlife Trust

**Date received:** 13/12/2021 via Web

**Full text:**

We welcome the policies on protecting and enhancing the natural environment, including biodiversity net gain and following the mitigation hierarchy. However, further steps are needed to ensure the plan complies with the Environment Bill and plans positively for nature's recovery.

**NB1 - Protecting, enhancing and expanding natural assets**

Not all high distinctiveness habitats have been identified and mapped across the district, as some areas have not been surveyed on the ground, or current data is of a significant age. We would recommend that any semi-natural habitats in critical locations, such as within or adjacent settlements, should be further surveyed in order that those meeting Local Wildlife Site or priority habitat criteria can be designated/ recorded and therefore protected in policy. Otherwise, protection could take the form of designating strategic areas or corridors for enhancement, (perhaps as 'Wildbelts') which have specific policy and objectives applied to them.

The Wildlife Trusts nationally are promoting the objective that 30% of land will be protected and in recovery for nature by 2030. The local plan could support this by establishing the current baseline for the district, and adopting a policy to achieve this target in South Staffordshire.

**NB2 - Biodiversity**

We welcome the proposed policy on BNG, however this needs to be updated to reflect the requirements of the updated NPPF and Environment Bill. Net gain would need to be delivered on all sites, not just major applications. A more detailed policy would assist developers in providing the relevant information and designing biodiversity into proposals at an early stage. There is potential for the LPA to require a higher % gain in key areas, e.g. areas identified as a priority for enhancement.

Consideration may be needed towards facilitating net gain on smaller or less viable sites, and advanced habitat creation to speed up the process. A register of sites available and suitable for BNG should be set up to facilitate developers accessing the required offsets. This should 'consider whether provisions for biodiversity net gain will be resilient to future pressures from further development or climate change'. The deliverability of net gain also needs to be considered as part of site allocations, to ensure the scale of development and green infrastructure is realistic.

**Climate Change and sustainable development**

We support the current policies, but feel that more should be added.

The Climate Change Adaptation & Mitigation report published by Staffordshire County Council in 2020 makes a number of recommendations, that the local plan should consider adopting. One of which is that 'Local Authorities may also wish to consider establishing a Carbon Offset Fund that developers can contribute to in lieu of on-site CO2 savings. This fund would be used to deliver carbon offsetting and reduction projects such as large-scale LZC installations and / or installations on existing built infrastructure (e.g. solar car parks), afforestation, and peatland restoration'. We would support proactive measures within the local plan seeking to deliver and fund such projects.

There are a number of areas where peat deposits are present in the district- these present opportunities to restore active peatlands, and thereby sequester carbon as well as provide biodiversity gains. The sites should be surveyed and protected, and be prioritised for restoration, possibly through biodiversity offsetting or carbon credits.

Increasing soil carbon should also be a key aim for carbon sequestration and soil conservation. Innovative projects such as biochar production and anaerobic digestion of vegetation could diversify farm businesses and contribute to soil health. The creation of carbon-storing habitats such as woodland, heathland, wetlands and grasslands especially on acidic soils would also have carbon benefits.

Using nature-based solutions to tackle issues such as flooding, air pollution and the need for urban cooling should be facilitated by policies in the plan.

Ensuring new buildings are orientated to maximise solar power generation and requiring solar panels on new developments should be considered. Provision of electric car charging points should be delivered through all new developments.

**Attachments:** None

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**Document Element:** Question 12

**Respondent:** Staffordshire Wildlife Trust

**Date received:** 13/12/2021 via Web

**Full text:**

We feel that NB1 and 2 should be strategic policies. The NPPF advocates that plans should have 'a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.'

**Attachments:** None