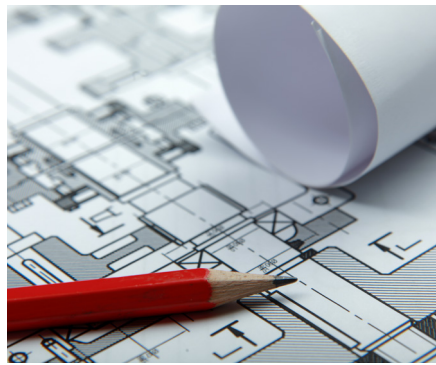




South Staffordshire Council

Publication Plan (Regulation 19) April 2024



Further information can be found at
www.sstaffs.gov.uk



A New Development Strategy for South Staffordshire 2023-2041

The Local Plan Review

Publication Plan

(Regulation 19 consultation)

April 2024

Foreword

It is vitally important that we set out a robust planning framework to enable much needed housing and employment development to come forward for our local communities in South Staffordshire. We know that our residents care about the communities in which they live and shaping our villages for future generations is a high priority.

This is the second Regulation 19 consultation we have carried out on the review of the Local Plan. This is due to the amendments made by the government late in 2023 to the National Planning Policy Framework (NPPF). To reflect these national changes, there are now fewer Green Belt sites in the plan.

Our Local Plan is based on robust planning evidence with infrastructure at its heart. The Local Plan also has a critical role in balancing growth with protecting the natural environment, including playing a key role in mitigating the effects of climate change. Whilst there are significant challenges in meeting national requirements, and providing new homes for our local communities, we are committed to protecting the Green Belt whilst ensuring high quality development.

The Local Plan is very much member led and it sets out sites for housing and employment and pitches for our Gypsy and Traveller community. The plan covers the period from 2023 up to 2041 and aims to provide for the needs of our own residents here in South Staffordshire and identifies two strategic sites that will deliver schools and other community facilities.

We appreciate your views which have been taken on board as we develop the final plan. This revised strategy means we can build on our strong track record of providing affordable homes and jobs and will bring about new or improved local services and facilities and public open spaces.

We are clear that having an adopted Plan in place is the best way of planning positively for South Staffordshire, will help us to resist unplanned development, and will put strong policies in place to deal with planning applications across the district.



Councillor Victoria Wilson
Cabinet Member for Business Enterprise and Community Infrastructure

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Development Strategy	Strategic or non-strategic policy
DS1: Green Belt	Strategic
DS2: Green Belt compensatory improvements	Strategic
DS3: Open Countryside	Strategic
DS4: Development needs	Strategic
DS5: Spatial Strategy to 2041	Strategic
Site Allocations	
MA1: Master planning Strategic Sites	Strategic
SA1: Strategic masterplanning location: Land East of Bilbrook	Strategic
SA2: Strategic masterplanning location: Land north of Penkridge	Strategic
SA3: Housing allocations	Strategic
SA4: Gypsy and Traveller allocations	Strategic
SA5: Employment allocations	Strategic
Delivering the right homes	
HC1: Housing Mix	Strategic
HC2: Housing Density	Non-strategic
HC3: Affordable Housing	Strategic
HC4: Homes for Older People	Strategic
HC5: Specialist Housing Schemes	Non-strategic
HC6: Rural Exception Sites	Non-strategic
HC7: First Homes Exception Sites	Non-strategic
HC8: Self & Custom Build Housing	Non-strategic
HC9: Gypsy, Traveller and Travelling Showpeople	Non-strategic
Design and space standards	
HC10: Design requirements	Strategic
HC11: Protecting amenity	Non-strategic
HC12: Space about dwellings and internal space standards	Non-strategic
HC13: Parking Provision	Non-strategic
Promoting successful and sustainable communities	
HC14: Health Infrastructure	Strategic
HC15: Education	Strategic
HC16: South Staffordshire College	Non-strategic
HC17: Open Space	Strategic
HC18: Sports Facilities and Playing Pitches	Strategic
HC19: Green Infrastructure	Non-strategic
Building a strong local economy	
EC1: Sustainable economic growth	Strategic
EC2: Retention of employment sites	Strategic
EC3: Employment & Skills	Non-strategic
EC4: Rural economy	Strategic
EC5: Tourism	Non-strategic
EC6: Rural workers dwellings	Non-strategic

EC7: Equine related development	Non-strategic
Community services, facilities and infrastructure	
EC8: Retail	Strategic
EC9: Protecting community services and facilities	Strategic
EC10: Wolverhampton Halfpenny Green Business Airport	Non-strategic
EC11: Infrastructure	Strategic
EC12: Sustainable transport	Strategic
EC13: Broadband	Non-strategic
Protecting and enhancing the natural environment	
NB1: Protecting, enhancing and expanding natural assets	Strategic
NB2: Biodiversity	Strategic
NB3: Cannock Chase SAC	Strategic
NB4: Landscape Character	Strategic
Climate Change and sustainable development	
NB5: Renewable and low carbon energy generation	Strategic
NB6A: Net zero new build residential development (operational energy)	Strategic
NB6B: New build non-residential development (operational energy)	Strategic
NB6C: Embodied carbon and waste	Strategic
NB7: Managing flood risk, sustainable drainage systems & water quality	Strategic
Enhancing the Historic Environment	
NB8: Protection and enhancement of the historic environment and heritage assets	Strategic
NB9: Canal network	Non-strategic

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Table 9: South Staffordshire Employment stock

Table 10: Recommended parking standards for developments

Table 11: Electric vehicle (EV) charging standards for new developments

Part A: Context and development strategy

Introduction

What is the Local Plan?

- 1.1 All planning authorities are required to have a strategic plan which provides a framework for the future planning of their area. This is known as a Local Plan and it provides the blueprint for future development in the district. This plan has been prepared in line with the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG).
- 1.2 This Local Plan will replace the Core Strategy which was adopted in 2012 and accompanying Site Allocations Document (SAD) which was adopted in 2018 as the Local Plan for the district. The SAD committed us to review our Local Plan to respond to the increasing need for development, both within South Staffordshire and in our neighbouring authorities, and it helped frame some of the key issues that this Local Plan needs to consider. The plan period for this Local Plan will be 2023-2041, although national policy requires the plan to be reviewed in whole or part every five years.

The role of the new Local Plan

- 1.3 The new Local Plan sets out how much development is required in the district up until 2041 and allocates the sites required to deliver the identified level of development needed. This includes residential (including Gypsy, Traveller and Travelling Showpeople accommodation) and employment uses. The Local Plan sets out the overall spatial strategy for growth and guides where development will in principle be supported, and where it will be restricted.
- 1.4 The previous Local Plan (Core Strategy and SAD) looked forward to 2028 and includes a number of sites which are allocated but have not yet been developed; these allocations are carried forward to this plan where they are assessed as still suitable. There are also a number of Safeguarded Land sites. This is land that was removed from the Green Belt in the SAD and earmarked for future consideration to meet some of the development needs in this Local Plan. On top of this, additional sites are allocated through this plan in order to meet our development needs.
- 1.5 This Local Plan sets out policies to guide the determination of planning applications and cover a lot of the same issues as those in the previous Core Strategy, such as promoting sustainable development, protecting and providing open spaces, design quality and protecting and enhancing the natural and historic environment. However, consideration has been given to what changes have been made to national policy since the previous Local Plan and how we should respond to these locally.
- 1.6 It is important that we have an up-to-date Local Plan and enough land to meet our housing requirements for a rolling 5 year timeframe. Without this, South Staffordshire will be vulnerable to speculative planning applications, resulting in a piecemeal

approach to new development and potentially sites that do not relate well to existing settlements.

The Local Plan in tackling Climate Change

- 1.7 Climate change has been recognised internationally as the most important environmental challenge that we face and has a direct impact on the council's activities and how we meet the needs of all residents in the district. The council has declared a climate emergency and following on from this has prepared a Climate Change Strategy that sets out our commitment to local action on climate change. One of the key strands of the council's Climate Change Strategy relates to our strategic planning responsibilities and sets out how we will use the planning system and the new Local Plan as a vehicle to encourage sustainable patterns of development, promote carbon resilient design, and protect the natural environment.
- 1.8 Local Planning Authorities have a legal duty to mitigate and adapt to climate change (Planning and Compulsory Purchase Act 2004, section 19). It is in this context that national planning policy is also placing much greater emphasis on the role of the planning system in tackling climate change with the latest NPPF (December 2023) placing climate change, and mitigating its impacts, front and centre when setting out what the presumption in favour of sustainable development means for plan making. In addition, the National Model Design Code makes it clear the use of natural features in scheme design can play a part in mitigating climate change. It is clear that the use of features such as tree lined streets can have multiple benefits, not only relating to climate change, but also improving the appearance and the ecological value of developments.
- 1.9 Given this, it is critical that the new Local Plan provides greater ambition and measures for mitigating and adapting to climate change than previous Local Plans. As a result, climate change measures are a consistent thread that will run through the plan. This goes beyond the more obvious climate change policies relating to renewable energy generation and energy efficiency measures for new buildings. The overall spatial strategy, in focusing greater levels of development in the larger villages with greater access to facilities and public transport, thus reducing car dependency, is key to achieving sustainable development and tackling climate change. A plethora of other policies relating to open space provision, design (including a requirement for tree lined streets), parking standards (and a requirement for electric vehicle charging points), sustainable transport/active travel measures, biodiversity net gain, Green Belt compensatory measures and reducing flood risk will all play their part as a package of environmentally focused policies.

Will the new Local Plan affect me?

- 1.10 The Local Plan will result in new development, with the plan detailing how future development will be distributed across the district and on which sites. This is based on the evidence gathered, comments made to previous consultations, site assessments

and the Sustainability Appraisal, land that is available and taking on board the requirements of national planning policy and guidance.

1.11 The changes that take place may affect you in a variety of ways. You may be able to see new homes or employment development near to where you live; new facilities may be provided close to you such as new shops, schools, or open spaces; new roads or cycle ways could be built to make journeys shorter or easier; and new employers may provide new job opportunities. Planning affects many aspects of our lives, and it is important that we get the balance right.

The plan making process

1.12 Preparation of the Local Plan has taken a number of years involving extensive public consultation with the key stages outlined in Table 1.

Main Stages		Date
Evidence Gathering	<ul style="list-style-type: none"> • Identification of main planning issues for the district. • Development of Strategy Options • Call for Sites • Sustainability Appraisal (SA) Scoping Report 	2016-present
Issues and Options	<ul style="list-style-type: none"> • Public consultation on whether the correct issues were identified and potential strategies and policies to meet different development needs • Additional Call for Sites • Initial SA Report 	October 2018
Spatial Housing Strategy & Infrastructure Delivery Consultation	<ul style="list-style-type: none"> • Public consultation on strategic approach to new housing development, including broad locations but not specific sites • SA of spatial growth options 	October 2019
Preferred Options Plan	<ul style="list-style-type: none"> • Public consultation on the council's preferred options for sites and policy directions of travel • Draft SA Report 	November 2021
Publication Plan (i) (superseded)	<ul style="list-style-type: none"> • Sets out the final Local Plan for submission to the Secretary of State (SoS)/Government • Public consultation on legal compliance and 'soundness' • Final draft SA Report 	November 2022
Publication Plan (ii)	<ul style="list-style-type: none"> • Sets out the final Local Plan for submission to the Secretary of State (SoS)/Government • Public consultation on legal compliance and 'soundness' • Final draft SA Report 	April 2024
Submission and Examination	<ul style="list-style-type: none"> • Local Plan submitted to Government (Planning Inspectorate) with all the comments received 	January 2025

	<p>during the Publication Plan consultation</p> <ul style="list-style-type: none"> • Independent Examination carried out in public by a Planning Inspector • Final SA Report 	
Adoption	<ul style="list-style-type: none"> • Council formally adopts Local Plan • SA Adoption Statement 	Estimated February 2026
Monitoring and Review	<ul style="list-style-type: none"> • Each year, identified targets and planning applications are monitored to assess delivery of the Local Plan 	Ongoing

Table 1: Stages of Plan-making

Issues and Options 2018

- 1.13 The [Issues and Options](#) in October 2018 was the first consultation on the new Local Plan. The council sought views on the appropriate level of growth to plan for and high-level scoping options for where new growth could be located. Development Management policy options covering issues such as affordable housing, climate change mitigation and sustainable transport were also consulted on, with the preferred policy options covering the different policy areas set out in Parts C-E of this document.

Spatial Housing Strategy and Infrastructure Delivery 2019

- 1.14 In October 2019 the [Spatial Housing Strategy and Infrastructure Delivery](#) (SHSID) consultation set out the council's preferred spatial strategy for distributing growth. This proposed a level of housing development that would meet South Staffordshire's housing needs plus a 4,000-home contribution towards unmet needs of the wider Greater Birmingham and Black Country Housing Market Area (GBBCHMA). The council's initial preferred spatial option for distributing growth was Option G – which proposed infrastructure-led development with a garden village area of search beyond the plan period. The preferred spatial option was not site specific and sought to focus growth on large strategic sites that would deliver new and improved infrastructure, including in areas near to the source of unmet housing needs in the Black Country; as well as limited growth in smaller villages. In addition, 6 reasonable alternative options for distributing growth were consulted on in the SHSID.

Preferred Options 2021

- 1.15 The [Preferred Options](#) was the third stage of public consultation, building upon previous consultations and taking on board all representations received in arriving at an amended infrastructure-led strategy. This consultation set out the proposed site allocations to meet the preferred strategy, and where known, detailed what additional infrastructure sites may require, or be able to realise. It also sought feedback on fully drafted Development Strategy and site-specific policies and set out our direction of

travel for Development Management policies, such as the percentage of affordable housing required on future development sites and asked for views on these.

Publication Plan (i) 2022

- 1.16 The council undertook consultation on a Publication Plan (Regulation 19) in November 2022 with the intention being that this would be the final draft Local Plan consulted on prior to submission of the Local Plan to the Secretary of State, for independent examination. However, significant proposed changes to national planning policy published in December 2022, specifically in relation to Green Belt policy, led the council to pause preparation of the Local Plan in January 2023 in order to await clarity on the government's intentions which had been earmarked for Spring 2023.

Publication Plan (ii) 2024

- 1.17 Conscious of the need to have an up to date plan in place, the decision was taken in July 2023 to start revisiting some of the evidence for the Local Plan and in September 2023 it was agreed that a further Regulation 19 consultation would be prepared for consultation in April 2024 which would supersede the previous Publication Plan, and ultimately be the version progressed to submission. Following publication of an updated NPPF in December 2023 work on a Publication Plan for consultation was finalised that reflected changes to national policy, most notably relating to Green Belt. This stage of Local Plan consultation is known as a Regulation 19 consultation and representations at this stage must focus on whether the plan meets the tests of soundness set out in the NPPF. This is the plan that will be submitted for independent examination.

Policies Map

- 1.18 This plan is accompanied by a policies map that replaces the previous policies map that accompanied the SAD 2018. The policies map is set on an Ordnance Survey background and illustrates geographically the policies in the plan. Included are a number of inset plans that focus on the areas and settlements that are the focus of growth. An interactive version of the policies map is available on the council's website.

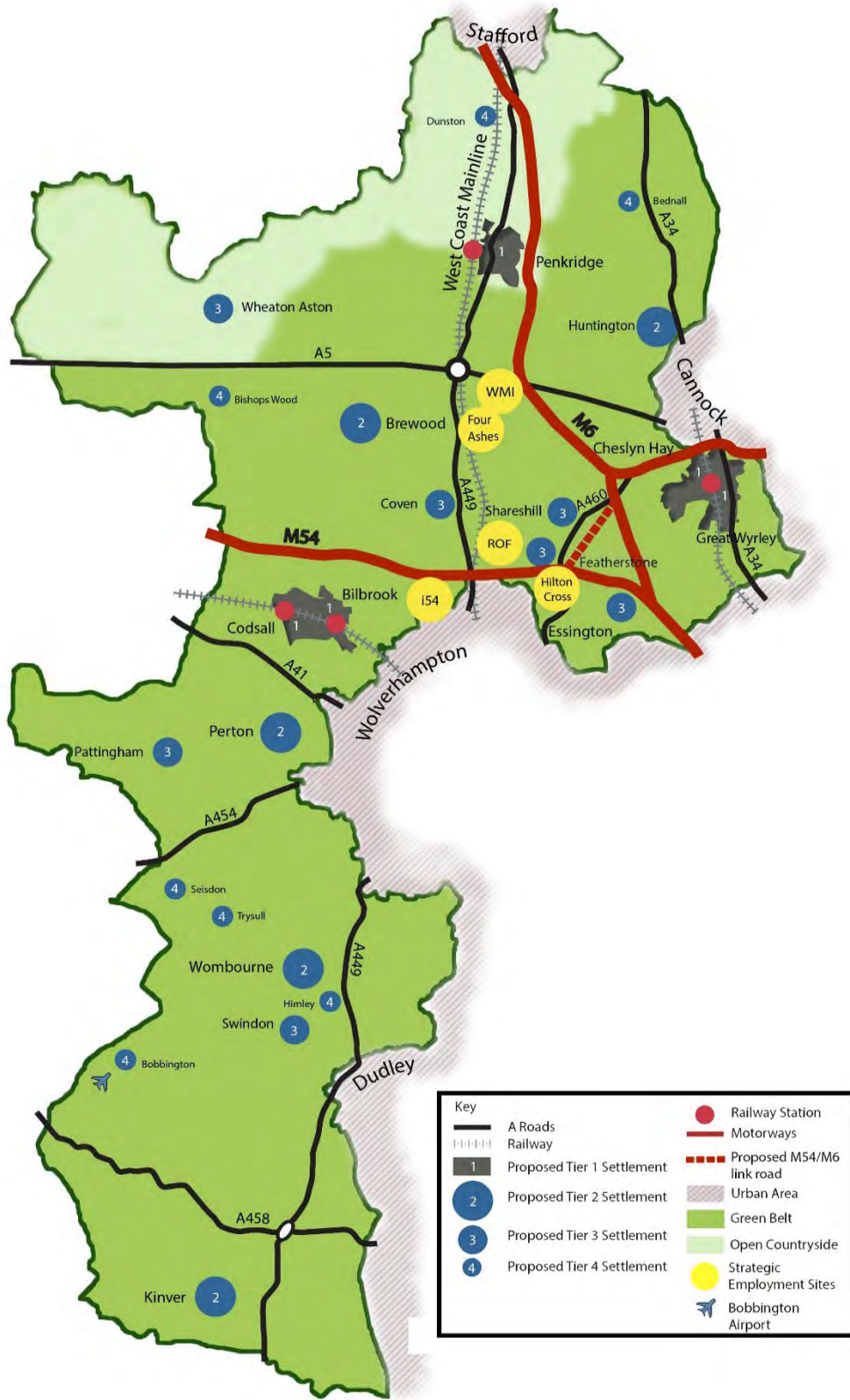
2. South Staffordshire: Setting the scene

- 2.1 South Staffordshire is a rural district on the north-western edge of the West Midlands Conurbation. It has an area of 101,000 acres (40,400 hectares) and a population of around 111,200 residents. Much of South Staffordshire (80%) lies within the West Midlands Green Belt (32,113 hectares), with the area beyond the Green Belt to the northwest of the district defined as 'Open Countryside'.



- 2.2 South Staffordshire is the southernmost of the nine Staffordshire authorities in the County. The district adjoins the major urban area of the West Midlands Conurbation including the Black Country boroughs of Dudley, Walsall and the City of Wolverhampton. The district also shares its boundaries with Shropshire and Telford to the west and Stafford to the north, with the County of Worcestershire to the south.

- 2.3 South Staffordshire has previously been a focus for inward investment resulting in substantial economic growth in the district in recent years. i54 South Staffordshire in particular has attracted internationally significant businesses such as Jaguar Land Rover, and the consent via a Development Consent Order (DCO) of the WMI Strategic Rail Freight Interchange is likely to see continued strong investment in the district. South Staffordshire is part of the Staffordshire and Stoke Local Growth Hub with the Strategic Economic Plan (2018) highlighting auto-aero as a priority sector of particular relevance to South Staffordshire.
- 2.4 South Staffordshire has a rich legacy of historic villages, buildings and landscapes with conservation areas, historic parklands and gardens, and buildings of local importance. These define the local identity and distinctive character of the historic environment of the district. The varied landscapes in the district are also home to a rich biodiversity resource, providing many types of habitats including areas of international, national and local nature conservation importance.
- 2.5 South Staffordshire has historically proven to be an attractive location for people to live. It has been a destination for people moving from the West Midlands major urban area and other nearby towns. Pressure for housing growth over and above the needs arising purely from within the district has continued.
- 2.6 South Staffordshire is made up of 27 parishes with a dispersed and diverse settlement pattern of villages, ranging from small hamlets to large villages with over 14,000 residents, each with their own distinctive character set in attractive countryside. The district has no cities or towns and no single dominant settlement.
- 2.7 Larger villages such as Bilbrook, Brewood, Cheslyn Hay, Codsall, Great Wyrley, Kinver, Penkridge, Perton and Wombourne contain a wide range of community facilities and services. These include libraries, sport and recreation including leisure centres, shopping, commercial and employment areas, and serve the smaller outlying villages and hamlets. However, local residents rely on the services provided within towns and cities outside of the district to meet some of their higher order needs, such as hospitals, certain types of retail needs and some employment opportunities.
- 2.8 Due to the nature of the district and the dispersed settlement pattern, a settlement hierarchy approach has been devised to reflect the level of service provision at each settlement. This has been informed by the council’s Rural Services and Facilities Audit (RSFA) 2021. The RSFA does not specifically determine how much growth should be attributed to settlements but does offer a guide by helping determine their comparative level of sustainability, and as such, their potential suitability for accommodating additional growth. Tier 1 villages are assessed as having the greatest access to services and facilities relative to other settlements, with Tier 4 settlements the lowest. The proposed settlement hierarchy is detailed on Map 1 below.



Map 1: South Staffordshire context map and proposed settlement hierarchy

3. What does the Local Plan need to consider?

National context

National requirements for plan-making

- 3.1 National policy requires that plans set out a vision and a framework for future development and seek to address the strategic priorities for the area. South Staffordshire is not within a Combined Authority area (or under the remit of an elected Mayor) and therefore strategic planning is the responsibility of the local planning authority. The strategic priorities for South Staffordshire will be set out in the Local Plan, which along with any potential Neighbourhood Plans, will form the Development Plan for the area.
- 3.2 The strategic policies for an area should include policies and site allocations to address key issues such as:
- an overall strategy for growth
 - housing (including affordable housing)
 - commercial development
 - retail and leisure
 - infrastructure
 - community facilities
 - climate change
 - conservation and enhancement of the natural and built environment
- 3.3 Plans should be clear in identifying strategic policies. They should form a starting point for local non-strategic policies which can include more detailed development management policies. Strategic policies should include a clear spatial strategy for bringing forward enough land to address housing needs over the plan period and be underpinned by relevant and up to date evidence. It is now a legal requirement to have completed a review of the Local Plan within 5 years of its adoption to take account of changing circumstances affecting the area.
- 3.4 The NPPF sets out that Local Plans should be prepared in line with procedural and legal requirements and will be assessed on whether they are considered ‘sound’. Plans are considered sound if they are: positively prepared, justified, effective, and consistent with national policy.

Neighbourhood Planning

- 3.5 South Staffordshire currently only has one adopted Neighbourhood Plan, the Kinver Neighbourhood Plan, which was made in September 2023. In addition, a number of other local groups have begun to advance plans for their area. The latest progress of these documents is available in the council’s Local Development Scheme. Codsall,

Bilbrook and Penkridge parishes have been designated Neighbourhood Plan areas and are currently undertaking scoping in advance of preparing Neighbourhood Plans. The role of Neighbourhood Plans is to promote a shared vision and identify local policies for the neighbourhood area, rather than strategic policies. Crucially, neighbourhood plans must be in general conformity with the area's strategic policies and cannot provide for less development than is set out in the Local Plan. Where a Neighbourhood Plan has been produced, then the local policies in it would take precedence over the local policies in the Local Plan if the Neighbourhood Plan has been adopted more recently.

Cross boundary Issues and the Duty to Cooperate

- 3.6 Local Planning Authorities have a legal duty to cooperate with neighbouring authorities and other prescribed bodies on strategic matters that cross administrative boundaries. Strategic matters can include housing, employment, infrastructure, and the Green Belt. The council has been working collaboratively with neighbouring authorities on cross boundary issues for a number of years. A clear example of this is how unmet employment needs from the Black Country helped support new employment allocations at i54 and ROF Featherstone in the adopted SAD (2018). Unmet housing need across the GBBCHMA, our own unmet needs for Gypsy and Traveller pitches and unmet employment land needs from the Black Country authorities are key cross boundary issue to be considered with neighbouring authorities through plan preparation.
- 3.7 The NPPF presumption in favour of sustainable development makes it explicit that authorities should plan for their own objectively assessed needs for housing and other development, as well as any needs that cannot be met in neighbouring areas unless NPPF policies provide a strong reason for restricting development or the adverse impacts of doing so would significantly and demonstrably outweigh the benefits. Agreements through Statements of Common Ground are now a necessity and will document the cross-boundary matters that need to be addressed and what progress has been made in dealing with them.

Evidence base

- 3.8 The new Local Plan must be based on a wide variety of up to date and robust evidence, providing technical information specific to South Staffordshire. Appendix A sets out the range of studies and topic papers that have been prepared and these are available on the council's website. After each policy in this document there is a bullet point list of the key evidence that has helped shape that policy.
- 3.9 A number of the evidence studies are iterative which means that an updated version will sit alongside each stage of the Local Plan. These are discussed in further detail below.

Sustainability Appraisal (SA)

- 3.10 The Local Plan must contribute to achieving sustainable development, aiming to achieve a better quality of life for all, both now and for future generations. A Sustainability Appraisal (SA) is a statutory requirement, which ensures that the environmental, social and economic effects of a plan and reasonable alternatives to the plan are being considered. A separate SA was prepared to appraise proposals at each stage of Local Plan preparation and was subject to consultation. The SA assesses the sustainability of the strategic approach, proposed allocations and reasonable alternatives, and the content of the policies contained in the plan. The SA findings have been used to help refine policy choices and site options through to the final proposals set out in the Local Plan.

Habitats Regulation Assessment (HRA)

- 3.11 The Habitats Directive establishes an ecological network of protected European Sites (Natura 2000 Network) and requires consideration of whether or not an Appropriate Assessment needs to be undertaken during the preparation of a Local Plan. The purpose is to assess what effects, if any, the plan might have on protected European sites. A Habitats Regulations Assessment (HRA) will be undertaken as required by Regulation 61 of the Conservation of Habitats and Species Regulations 2010 (as amended) in order to see whether the plan could have the potential to result in likely significant effects upon protected European sites and sites of international importance for nature conservation.
- 3.12 Motte Meadows Special Area of Conservation (SAC) near Wheaton Aston is located entirely within South Staffordshire. There are also three SACs in close proximity to the district boundary; Cannock Chase SAC, Cannock Extension Canal SAC and Fens Pools SAC, which must be considered when preparing any plans or proposals, to ensure they have no adverse impact on these sites.
- 3.13 Further information on the HRA process and the mitigation required for Cannock Chase SAC, can be found in the HRA documentation and on our website.

Infrastructure Delivery Plan (IDP)

- 3.14 A refreshed Infrastructure Delivery Plan (IDP) has been prepared to support the new Local Plan to ensure the required infrastructure and investment needed to deliver the plan effectively is identified. The IDP includes the specific infrastructure projects needed to deliver planned growth as well as details of indicative costs, delivery mechanisms and the phasing on infrastructure where known. This is particularly important for the large strategic site allocations, which by their nature involve more complex infrastructure requirements and have been informed by extensive ongoing engagement with relevant infrastructure providers.

Issues and Challenges for South Staffordshire

3.15 Community engagement throughout plan preparation confirmed a number of issues and challenges in South Staffordshire that should be addressed by the new Local Plan and are set out in Tables 3-5. These issues and challenges are informed by the SWOT analysis in Table 2 below:

Strengths	Weaknesses
<ul style="list-style-type: none"> • Natural assets including natural green spaces, parks and gardens and designated wildlife sites. • Built assets including attractive characterful villages, listed buildings, conservation areas and tourist attractions. • Very well served (particularly in the north) by national railway and highway transport corridors, with good access to nearby major conurbations. • Low levels of unemployment. • High life expectancy for residents. 	<ul style="list-style-type: none"> • Demographic imbalance with higher than average proportion of residents aged 65+, and a projected decline in families and working age residents, with resultant threat to some service provision. • Reliance on neighbouring areas for higher order services and a dependency on their economic health for access to employment. • Poor public transport connectivity in parts of the district.
Opportunities	Threats
<ul style="list-style-type: none"> • Continued development of the strategic employment sites including at i54 South Staffordshire, ROF Featherstone and West Midlands Interchange leading to greater inward investment and prosperity. • Plan positively to meet future housing needs in a way that improves infrastructure, services and facilities for existing and new households. • Build on the tourism offer of the built and natural environment. • Enhance the natural environment through sympathetic new development and by measures such as biodiversity net gain and Green Belt compensatory measures. • Role in meeting cross boundary unmet needs and opportunities to masterplan strategic site allocations creating sustainable new communities. 	<ul style="list-style-type: none"> • Increasing pressure for development on land within the Green Belt to meet our own housing needs and the needs of adjoining areas, which if not properly managed, could threaten the quality and character of the district. • Lack of available brownfield land in the district. • A concentration of large scale developments, such as the West Midland Interchange (WMI) strategic rail freight interchange, poses a threat to the district in terms of the cumulative impact on the surrounding infrastructure.

Table 2: SWOT analysis

Homes and Communities - Issues and Challenges

Issue / Challenge	Explanation
<p>Level of growth needed to meet South Staffordshire’s housing needs and unmet housing needs of the wider housing market area.</p>	<ul style="list-style-type: none"> • South Staffordshire is within Greater Birmingham and Black Country Housing Market Area (GBBCHMA), which is made up of fourteen diverse local authorities, including Birmingham and the four Black Country authorities. • South Staffordshire’s local housing need (LHN) is currently 227 dwellings per annum. • Through the Duty to Cooperate, South Staffordshire should consider its role in providing additional homes to meet needs of the GBBCHMA through a Statement of Common Ground, having regard to national policy. • Pressure on South Staffordshire to release land for housing in the Open Countryside and outside the Green Belt will be particularly acute.
<p>Levels of growth needed to meet South Staffordshire’s Gypsy and Traveller needs.</p>	<ul style="list-style-type: none"> • Need to provide additional Gypsy and Traveller pitches to meet as far as possible the need identified in the Gypsy and Traveller Accommodation Assessment (GTAA) 2024 • Gypsy and Traveller sites within the district are often in rural locations, with a large proportion concentrated in north of district close to the strategic transport network. • Existing sites are privately owned and located in Green Belt. Strong preference for permanent residential pitches over new public sites from the traveller community. • Principle issues for meeting pitch needs include delivering new pitches in the right location for the right people, having regard to existing sites and family need, and recognising the constraints that impact the district.
<p>Delivering a variety of homes, to meet the needs of all groups of the community and better balance the local housing market.</p>	<ul style="list-style-type: none"> • Currently, there is a mismatch between existing stock and future housing needs. • Providing smaller residential units for young families and older people wishing to downsize will free up family sized accommodation elsewhere in community. • The Housing Market Assessment 2022 and partial update (2024) considers the type of housing and mix of tenures needed and will guide policies to support an appropriate mix of market and affordable housing.
<p>Meeting the housing needs of the ageing population and providing specialist housing.</p>	<ul style="list-style-type: none"> • District has an increasingly ageing population, considerably higher than the national average. • Major challenge in meeting needs of older people includes development of new and improved services, and the provision of the right mix of specialist housing, including bungalows. • The Local Plan will need to support the provision of specialist housing requirements of other groups, such as those with disabilities.

<p>Delivering affordable housing to meet local needs.</p>	<ul style="list-style-type: none"> • House prices in the district have increased, with villages attracting those who are prepared to travel to work in nearby major urban areas. The ratio of house prices to incomes is high in regional terms. • Challenge of maintaining adequate and suitable supply of affordable housing for those on low incomes and first-time buyers. • A significant proportion of affordable housing is delivered through development contributions via Section 106 agreements.
<p>Delivering decent homes of a high-quality design that reflect and maintain the local distinctiveness, character and quality of the countryside and villages.</p>	<ul style="list-style-type: none"> • Key challenge of providing a variety of well-designed homes through working with a variety of small and large housebuilders, meeting need for Self and Custom Build Housing, working with Registered Providers (RPs) and adopting a flexible approach to conversions and reallocation of undelivered sites. • Cost effective design measures can be undertaken to create well designed, energy efficient homes with appropriate levels of internal and external space which leads to wider health and wellbeing benefits for residents. • Use of masterplans and design codes to provide a framework for creating beautiful sustainable developments.
<p>Ensuring access to a good range of health services as well as sport, leisure and recreational facilities, making a positive contribution to health and wellbeing of residents.</p>	<ul style="list-style-type: none"> • Issues including obesity affecting some areas of the district, and only just over half of South Staffordshire adults meet recommended levels of physical activity. • One in four adults are physically inactive in the district, similar to the national average. • Planning has an important role in facilitating healthy lifestyles changes, such as encouraging exercise. • Sport, leisure, and recreational facilities should be accessible to residents and be of a suitable quality to be attractive to users. • Active travel, such as cycling and walking, should be facilitated through scheme design and off-site financial contributions. • Key challenge is ensuring sufficient access to GP/health centres to accommodate residents from new developments.
<p>Meeting the needs of children and young people, including the provision of good education and play spaces.</p>	<ul style="list-style-type: none"> • Issue of ensuring new developments incorporate play provision that parents and children in existing communities can access. • Education attainment in South Staffordshire for GCSEs is similar to England average however there are inequalities in attainment levels within the district. • Key challenge of ensuring there is adequate school provision to accommodate increased pupil numbers due to new development.
<p>Reduction of crime and anti-social behaviour and fear of crime.</p>	<ul style="list-style-type: none"> • Planning for new development should include measures that limit crime and deter anti-social behaviour therefore promotion of natural surveillance and feeling of security for residents important.

Table 3: Homes & Communities – issues and challenges

Economic Prosperity - Issues and Challenges

Issue / Challenge	Explanation
<p>Levels and types of growth needed to meet South Staffordshire’s employment land needs and ensuring that local people have good access to a range of employment opportunities.</p>	<ul style="list-style-type: none"> • South Staffordshire is an attractive location for commercial development with a diverse range of small, medium, and large businesses and firms. • Key challenge of providing a mixed portfolio of employment in terms of quality, size and use classes. • Retaining existing businesses, diversifying the economy, creating more skilled jobs and increasing the retention of young, educated residents will strengthen the local economy and see local people have access to a range of employment opportunities. • Economic Development Needs Assessment (EDNA) 2024 identifies a pipeline of sites to meet our own needs and a potential contribution in meeting unmet needs of neighbouring authorities. • Regional need for more strategic employment identified through the West Midlands Strategic Employment Sites Study (2021).
<p>Supporting the economies of adjoining areas and pressure to release land to meet a proportion of their unmet employment needs.</p>	<ul style="list-style-type: none"> • Significant proportion of South Staffordshire’s population travels to work outside the district. The Black Country and other adjoining authorities’ economies are an important source of employment for residents and an important factor in the prosperity of the district. • Over recent years South Staffordshire has aspired to provide more local jobs, reduce levels of out commuting and provide employment for our residents and those of neighbouring areas, such as through i54 South Staffordshire. • South Staffordshire EDNA (2022) identifies South Staffordshire as being in the same FEMA (Functional Economic Market Area) as Cannock Chase, Dudley, Stafford, Walsall and Wolverhampton. The Black Country FEMA has a significant unmet need for employment land for the period to 2041 • As South Staffordshire is in the same FEMA as three of the Black Country authorities the Local Plan needs to consider South Staffordshire’s role in meeting any cross-boundary needs.
<p>Supporting the aims and ambitions of the Staffordshire and Stoke-on-Trent Local Enterprise Partnership (SSLEP).</p>	<ul style="list-style-type: none"> • Including expansion in large and small businesses in a number of priority sectors. • Incorporates development of advanced manufacturing industries in aerospace and automobile sectors and capitalising on supply chain opportunities from global businesses such as Jaguar Land Rover.
<p>Managing the impact</p>	<ul style="list-style-type: none"> • Ensuring a policy framework is in place to manage the local

of West Midlands Interchange (WMI).	environmental impacts and pressure on local infrastructure as effectively as possible.
Supporting our existing employment sites, including strategic sites at i54 South Staffordshire, ROF Featherstone, Hilton Cross, Four Ashes and West Midlands Interchange.	<ul style="list-style-type: none"> • Safeguarding delivery of strategic employment sites which provide important job opportunities for residents of South Staffordshire and neighbouring areas. • Inward investment opportunities should be fully harnessed at the strategic sites, including opportunities for further expansion of the sites where appropriate and feasible.
Supporting higher education attainment, the development of skills and access to training and employment opportunities	<ul style="list-style-type: none"> • District is relatively prosperous – the number of those employed within the top 3 professional and managerial sectors exceeds national average and the number of adults with no qualifications below national average. • There are pockets of deprivation within district with higher levels of unemployment. • Supporting development of skills, access to education and local training opportunities are key issues for the Local Plan to ensure residents can benefit from economic growth.
Provide opportunities for sustainable rural economic growth whilst protecting the environment, including supporting farm diversification and tourism.	<ul style="list-style-type: none"> • Need to diversify the rural economy whilst enabling farmers to continue to manage the rural landscape. • Farm complexes can offer scope for alternative local employment uses for residents that support the rural economy and reduce the need for travel. • Conversions of agricultural buildings to employment uses, such as tourism, are preferred to conversions to residential uses, which may be less sustainable. • Need to proactively support and encourage improvement of tourist facilities and attractions to promote South Staffordshire as a place to visit and as a base to access a wide range of tourist attractions within the West Midlands and beyond.
Ensuring local people have access to retail and a good range of essential community facilities and services, supporting the continued role of village and neighbourhood centres as a focus for delivery of these.	<ul style="list-style-type: none"> • The larger villages in South Staffordshire contain a range of community facilities including retail centres, libraries, sport and recreation and serve smaller outlying villages and hamlets. • Local residents also rely on services provided within towns and cities outside of district to meet higher order needs. • Loss of facilities and services in smaller villages is an ongoing trend. • Protecting village shops and community facilities and providing accessible services to meet needs of all sectors of the community are key priorities.
Ensuring impact on the road network is	<ul style="list-style-type: none"> • Important when considering growth options that impact on road network is fully considered and proposals limit impact on

<p>fully considered during plan-making.</p>	<p>network and mitigation measures are secured where appropriate.</p> <ul style="list-style-type: none"> • Understanding the effect of the M54/M6 link road.
<p>Ensuring provision of suitable public transport services with appropriate facilities (such as adequate parking) at transport hubs.</p>	<ul style="list-style-type: none"> • Proximity to strategic road and rail links, particularly in north, connects the district to the West Midlands and beyond, attracting commuters and creating pressure on housing and employment. • West Coast Main Line railway runs through the northern part of the district between Wolverhampton and Stafford, stopping at Penkridge. • Rail services provided on Shrewsbury to Wolverhampton line, with stations at Codsall and Bilbrook. • Walsall to Rugeley line with station at Landywood (Great Wyrley). • Challenge for car and bicycle parking at all stations, with commuters parking on surrounding residential roads. • Parking an issue in some village centres for residents accessing shops and other services. • High level of car ownership and improving access to public and community transport for those without a car remains an issue. • Challenges around increasing cycle and footpath provision for leisure or commuting, including connecting to established routes. • Effective rural public transport services are key for ensuring people have sustainable access to facilities and employment opportunities inside and outside the district.
<p>Improving access to suitable broadband and digital communication networks.</p>	<ul style="list-style-type: none"> • Access to digital networks and high-speed broadband remains inconsistent. • Home working is becoming an increasing feature in rural areas, which has been further accelerated as an effect of the Covid-19 pandemic. • The expansion of broadband internet and other technologies are important to support sustainable forms of employment and will help encourage the development of small and medium sized enterprises (SMEs) in the district.

Table 4: Economic Prosperity – issues and challenges

The Natural and Built Environment - Issues and Challenges

Issue/Challenge	Explanation
Protecting the Green Belt and understanding which areas of South Staffordshire’s Green Belt make the most contribution to the five national purposes of the Green Belt.	<ul style="list-style-type: none"> • 80% of South Staffordshire is designated Green Belt. • There is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated, although authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified. • The Black Country and South Staffordshire’s Green Belt Study (2019) is a key piece of evidence when considering this issue, identifying the least to the most sensitive parcels of Green Belt.
Protecting sensitive areas of Open Countryside beyond the Green Belt.	<ul style="list-style-type: none"> • Around 14% of district is Open Countryside. • Much of the character of countryside beyond the Green Belt is of high landscape quality, ecological, historical, archaeological, agricultural and recreational value. • Protecting the most sensitive areas of Open Countryside is a key issue.
Understanding South Staffordshire’s landscape character and areas sensitive to change.	<ul style="list-style-type: none"> • Landscape character and structure of South Staffordshire has changed significantly over time, including the removal of trees and hedgerows and increased agricultural activity. • Key issue for Local Plan is understanding landscape character and where possible, protecting the most sensitive areas.
Protecting, conserving and enhancing the district’s rich natural environment and ecological assets	<ul style="list-style-type: none"> • Varied landscape in the district and home to a rich biodiversity providing many types of habitats including Special Areas of Conservation (SACs), Special Protection Areas (SPAs), National Nature Reserve (NNR), Local Nature Reserves (LNRs), Sites of Biological Importance (SBIs) and Sites of Special Scientific Interest (SSSIs). • Western fringe of Cannock Chase Area of Outstanding Natural Beauty (AONB) lies within the district and there is a statutory obligation to protect and manage the area. Within the AONB lies an area of lowland heath, protected by SAC status. • Agricultural land within the district ranges from best quality grade 1 down to grade 3b. The best and most versatile agricultural land is classified as grades 1 and 2 & 3a. • Conserving and protecting valued finite resources is a key issue to consider when planning new development. • Hatherton Canal Restoration Project could contribute to tourism and flood risk alleviation.
Ensuring sufficient good quality public open spaces and green infrastructure is available for residents	<ul style="list-style-type: none"> • Extensive areas of attractive open land within the district for public recreational uses. • These public open spaces provide informal leisure opportunities as well as enjoyment of the natural environment.

<p>and visitors to the district.</p>	<ul style="list-style-type: none"> • Key challenge of conserving and protecting open space for use by generations to come.
<p>Protecting and conserving the district’s historic asset.</p>	<ul style="list-style-type: none"> • Over 640 listed buildings and 19 Conservation Areas within the district with many other locally important buildings and structures. • The district’s archaeological resource is rich and varied and includes scheduled ancient monuments. • Ensuring development is sensitive to these irreplaceable assets and their settings and appropriate mitigation is applied where harm is unavoidable is a key challenge.
<p>Planning for the impact of climate change and protecting existing and new communities from flood risk through flood resilience measures.</p>	<ul style="list-style-type: none"> • South Staffordshire Council declared a climate emergency in 2019. • Major challenge of ensuring new development is sustainable, addressing the implications of climate change and the reduction of Co2 emissions, encouraging renewable energy and the promotion of energy efficiency. • Challenge of ensuring a sufficient amount of electric vehicle charging points are provided throughout the district, with increased demand and in preparation for the ban on the sale of petrol and diesel cars. • South Staffordshire is covered by two river catchments: Smestow Brook within the River Severn Catchment; and the River Penk within the Trent catchment. Many additional tributaries flow into the main rivers contributing to the flood risk within the district. Penkridge, Wombourne and Kinver, and a number of other settlements, are affected by fluvial flooding. • Surface water flooding an issue in certain hotspots. The Lead Local Flood Authority identifies Brewood as one of the top 10 ‘rural’ areas and Perton one of the top 10 ‘urban’ areas with properties at risk from surface water and small water courses in Staffordshire. • Key challenge in ensuring future growth does not exacerbate these issues and where possible can contribute to reduction in flood risk.

Table 5: Natural and Built Environment – issues and challenges

4. Vision and strategic objectives

- 4.1 Based on the issues and challenges outlined in chapter 3, it is crucial that the Local Plan sets out a vision for the district to cover the plan period (2023-2041) and identifies clear objectives for aspects such as housing, infrastructure, economic growth and environmental protection. Collectively, the policies in the plan should help enable the strategic objectives to be achieved and to deliver the vision and strategic priorities for the district.

The vision - what will South Staffordshire be like in 2041?

South Staffordshire will strive to protect & enhance its distinctive rural character, communities, and landscape, whilst playing its part in addressing the climate emergency and creating beautiful and thriving new places in which people can live, work, and enjoy leisure activities.

Strategic objectives - to deliver the vision

Development Strategy
Strategic Objective 1: Protect the Green Belt and Open Countryside, ensuring that where Green Belt release is proposed, mechanisms are in place to secure compensatory improvements to the environmental quality and accessibility of the remaining Green Belt.
Strategic Objective 2: Meet the housing and employment needs of the district whilst making a proportionate contribution towards the unmet needs of Greater Birmingham and Black Country Housing Market Area and wider Functional Economic Market Area. New housing will be focused on sustainable locations within the district, with a particular focus on the district’s most sustainable Tier 1 settlements.
Homes and Communities
Delivering the right homes
Strategic Objective 3: Provide housing to meet the needs of different groups in the community, including a good range of market and affordable housing of varying sizes and housing that meets the needs of an ageing population and people with specialist housing needs, as well as the needs of people wishing to build their own home and members of the gypsy and traveller community.
Design and space standards
Strategic Objective 4: Develop a built environment that is of high-quality design, respects the character of our existing settlements, reflects local vernacular and creates beautiful and sustainable places where people want to live, work and enjoy leisure activities.
Promoting successful and sustainable communities
Strategic Objective 5: Encourage healthy communities through the provision of good

access to health and education infrastructure, open space, sport and leisure and children’s play and youth development facilities.
Economic Prosperity
Building a strong local economy
Strategic Objective 6: Develop an economic strategy that seeks to retain existing employment and fosters sustainable economic growth, encouraging inward investment and job creation in key sectors such as advanced manufacturing and providing the skills to enable residents to access these jobs.
Strategic Objective 7: Support the vitality of rural areas by enabling the sustainable growth and diversification of rural businesses, including supporting tourism and agriculture.
Community services, facilities and infrastructure
Strategic Objective 8: Protect and enhance sustainable village centres, retaining the existing retail offer and ensuring good access to community services and facilities.
Strategic Objective 9: Ensure that new development is served by appropriate infrastructure such as road improvements, health, recreation, and education facilities.
Strategic Objective 10: Support the development of sustainable transport networks including ensuring that where possible existing and new development is well served by various public transport modes and active travel options such as walking and cycling.
The Natural and Built Environmental
Protecting and enhancing the natural environment
Strategic Objective 11: Protect and enhance the district’s natural environment including the district’s landscape character and key natural assets such as the Cannock Chase Special Area of Conservation, whilst ensuring that biodiversity net gain is delivered across the district.
Climate Change and sustainable development
Strategic Objective 12: Ensure that our communities are resilient and adaptable to the effects of climate change. Deliver appropriate climate change mitigation through renewable energy generation and ensure that developments are designed and located in a way that delivers greater energy conservation and reduces carbon emissions.
Enhancing the Historic Environment
Strategic Objective 13: Enhance the built environment, conserving and enhancing the district’s heritage assets including the district’s canal network.

Table 6: Strategic Objectives

Relationship between strategic objectives and policies

4.2 The objectives take forward the planning vision for the district and set out in more detail what the Local Plan is seeking to do. Whilst the principle aim of the plan is to seek to achieve sustainable development, the above plan objectives set the framework for developing the policies in more detail. The plan’s policies are the means of achieving the vision and objectives through the development management process. In relation to certain cross cutting issues such as climate change, there may be policies which work towards a number of the plan’s objectives.

5. Development Strategy

Green Belt

- 5.1 The distinctive character of South Staffordshire is directly influenced by the fact that approximately 80% of the district is Green Belt. This contributes to the district's rural character and helps distinguish the district from neighbouring urban areas such as the Black Country. Protecting the Green Belt from unplanned development as far as possible is therefore a key objective (Strategic Objective 1) of the Local Plan.
- 5.2 National Policy confirms that there is no requirement for Green Belt boundaries to be reviewed or changed when Local Plans are being prepared and that it is within authorities' gift to choose to review Green Belt boundaries through the Local Plan where they feel that exceptional circumstances for doing so exist and these can be fully evidenced and justified. The Local Plan review does confirm limited Green Belt boundary amendments and therefore a policy detailing where the council's development strategy requires such Green Belt amendments is necessary, as well as ensuring a strong policy framework for resisting planning applications that would result in inappropriate development in the Green Belt.
- 5.3 Wherever possible, the council has looked to allocate suitable brownfield sites first and foremost, to reduce pressure on the district's Green Belt, however these are very limited due to the largely rural nature of the district. Most large-scale site options on brownfield land are either in isolated rural locations or form part of the district's employment land supply and need to be retained to ensure the district can meet its employment land needs. Previous Local Plans also identified large brownfield sites in the Green Belt (known as major developed sites in the Green Belt) but all of these have now been developed. There is an area of brownfield land adjacent to the south-western edge of Wombourne, which is mainly occupied by the car storage company Copart. This site has been assessed as an option for housing, however it is not proposed for allocation due to uncertainty over the relocation of the existing business. Elsewhere, brownfield opportunities in sustainable locations tend to be small scale (e.g. garage sites, small infill plots, changes of use under permitted development) and if unconstrained have historically come forward through the Development Management process and outside of the Local Plan, as the principle of such schemes is generally considered acceptable. The council has included a windfall allowance for these smaller site opportunities within the housing trajectory to ensure this is accounted for in future supply.
- 5.4 In order to deliver the vision for the district over the plan period it is essential that there is a strong policy position for protecting the Green Belt and this is set out in Policy DS1 below.

Policy DS1 – Green Belt

Within the West Midlands Green Belt, as defined on the policies map, opportunities to enhance the beneficial use of the Green Belt will be supported. This may include opportunities to provide access, for outdoor sport and recreation, to retain and enhance landscapes, visual amenity and biodiversity, or to improve damaged and derelict land.

Inappropriate development is, by definition, harmful to the Green Belt and will not be supported except in very special circumstances. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and other harm, is clearly outweighed by other considerations.

The construction of new buildings within the Green Belt should be regarded as inappropriate, unless it is for one of the exceptions listed within the NPPF. A separate Green Belt Supplementary Planning Document (SPD) will be prepared for further guidance.

Limited affordable housing for local community needs in the Green Belt will be supported on small rural exceptions sites where the development complies with Policy HC6.

The Green Belt boundary is altered through this Plan to accommodate development allocations set out in Policies SA1, SA3, and SA5. The boundaries of the reviewed Green Belt sites are identified in Appendices B-E of this document and on the policies map.

Development proposals should be consistent with other Local Plan policies.

Green Belt compensatory improvements

- 5.5 The NPPF requires local plans releasing Green Belt to set out ways in which the impact of altering Green Belt boundaries can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. It is therefore important that this Local Plan provides a mechanism to secure such improvements for any sites released from the Green Belt.
- 5.6 The district has a large rural area enclosing its numerous villages, the majority of which is covered by Green Belt. There are therefore a significant number of options available to sites in improving the environmental quality and accessibility of remaining Green Belt, many of which are set out in the district's Open Space Strategy and Nature Recovery Network mapping. Policy DS2 intends to offer a mechanism for delivering these improvements, offering a stepped approach to ensure that any compensatory improvements offer the greatest benefit to communities in closest proximity to land released from the Green Belt where possible.

Policy DS2: Green Belt Compensatory Improvements

Planning permission will not be granted for development of sites removed from the Green Belt through the Local Plan unless and until appropriate additional compensatory improvements to environmental quality and accessibility of remaining Green Belt are incorporated into a Section 106 agreement. As a starting point any compensatory improvements should be in addition to other local plan policy standards.

Where compensatory improvements have been identified in the Local Plan on remaining Green Belt land adjacent to an allocated site, such improvements must be secured through planning applications for these developments. Where areas of land for compensatory improvements have not been identified adjacent to a site through the Local Plan, applicants must demonstrate proportionate compensatory improvements to remaining Green Belt land in accordance with the following hierarchy:

- a) Compensatory improvements to remaining Green Belt land adjacent to, or in close proximity to the development site;
- b) Compensatory improvements to remaining Green Belt land within the wider locality accommodating the development;
- c) Compensatory improvements to remaining Green Belt land in an area identified through the council's latest Nature Recovery Network mapping or Open Space Strategy.

In the event that it is robustly demonstrated that none of the above options can be satisfied (e.g. as land is demonstrably not available) then the council will accept a commuted sum that it will use to undertake compensatory improvements.

Development proposals should be consistent with other Local Plan policies.

Open Countryside

- 5.7 Equally important to maintaining the special character of South Staffordshire is having a policy framework for protecting the Open Countryside located to the northwest of the district beyond the Green Belt. Whilst not having the same level of national protection as Green Belt designation, the land designated in the Local Plan as Open Countryside is still much valued countryside particularly for its landscape and ecological qualities. It is therefore important as part of the district's wider development strategy, that a clear policy approach on what type of development is explicitly permitted in the Open Countryside is set out in this Local Plan. Equally, it will need to set out what policy factors proposals will need to be consistent with for development in the Open Countryside to be acceptable in principle.

Policy DS3 – Open Countryside

The district's Open Countryside is defined as the area in the district which is both beyond the West Midlands Green Belt and outside of individual settlements' development boundaries, as indicated on the Policies Map.

The Open Countryside contains many sensitive areas, including its landscapes and areas of ecological, historic, archaeological, economic, agricultural and recreational value. The council will protect the intrinsic character and beauty of the Open Countryside whilst supporting development proposals which:

- a) Assist in delivering diverse and sustainable farming enterprises;
- b) Deliver/assist in delivering other countryside-based enterprises and activities, including those which promote the recreation and enjoyment of the countryside, such as forestry, horticulture, fishing and equestrian activities;
- c) Provide for the sensitive use of renewable energy resources (in conjunction with Policy NB5); or
- d) Enable the re-use of an existing building, providing that the proposed use of any building (taking into account the size of any extensions, rebuilding or required alterations), would not harm the intrinsic character and beauty of the Open Countryside.

The policy provisions set out above indicate the types of development which will, in principle, be supported within the Open Countryside. In addition to the requirements set out in this policy, any proposed scheme must also be consistent with any relevant policies set out elsewhere within the Local Plan in order to be supported.

All types of development in the Open Countryside which are not explicitly supported by Policy DS3 will be considered on a case-by-case basis. Such proposals will only be permitted where they are not located on best and most versatile agricultural land and are fully consistent with any other relevant policies set out elsewhere in the Local Plan. These include, but are not limited to, policies which relate to the district's:

- overall development strategy
- design standards
- landscape character and assets
- heritage assets
- ecological assets and biodiversity
- recreational assets
- housing mix requirements (where applicable)
- sustainable travel requirements

The Open Countryside boundary will be altered through this Plan to accommodate the relevant development allocations set out in Policies SA2, SA3 and SA5. The boundaries of the reviewed Open Countryside sites are identified in Appendices B, C and E of this document.

Development proposals should be consistent with other Local Plan policies.

Housing

The district's housing needs

- 5.8 The government requires that Local Plans cover a 15 year period post adoption of the plan and will cover the period 2023-2041. The district's future housing need is then calculated using the government's standard method. This currently requires the district to deliver a minimum annual average of **227 dwellings per annum** starting from the 2023/24 monitoring year until the end of the plan period (2041). This equates to 4086 new homes over the plan period.

Unmet housing needs from the wider housing market area

- 5.9 In addition to the district's own housing needs, there is emerging evidence of unmet needs from the wider GBBCHMA, within which South Staffordshire is located. The two most significant sources of potential unmet needs are currently Birmingham City and the four Black Country authorities. The adopted Birmingham Development Plan¹ and urban capacity evidence from the Black Country² authorities suggests that a significant unmet need is arising across the GBBCHMA, driven by limited housing land in these urban areas.
- 5.10 Recognising the existing and emerging shortfalls, the fourteen GBBCHMA local authorities³ jointly prepared the GBBCHMA Strategic Growth Study in 2018. This drew together existing evidence on housing supply and need across the entire housing market area, estimating that at that time the unmet needs of the GBBCHMA sat at around 28,000 dwellings up to 2031, rising to nearly 61,000 dwellings by 2036. Subsequently consultation by the Black Country authorities in 2021 and Birmingham City Council in 2022 indicated a potential shortfall of 28,239 and 78,415 homes respectively, indicating that the shortfall is likely increasing.
- 5.11 In light of unmet needs, the 2018 Strategic Growth Study recommended a series of strategic growth locations across the housing market area, including a number of locations in South Staffordshire. Using this evidence, it was proposed to test an additional contribution of 4,000 dwellings to the unmet housing needs of the GBBCHMA in the council's Local Plan review, based on the scale of growth implied in the district by the strategic locations identified in the GBBCHMA Strategic Growth

¹ 37,900 homes as of the 2017 Birmingham Development Plan

² The Black Country Urban Capacity Review (2021)

³ Cannock Chase District Council, Wolverhampton City Council, Dudley Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Walsall Metropolitan Borough Council, Tamworth Borough Council, Birmingham City Council, South Staffordshire District Council, North Warwickshire District Council, Redditch Borough Council, Lichfield District Council, Bromsgrove District Council, Solihull Metropolitan Borough Council and Stratford on Avon District Council

Study. Alternative levels of growth were tested through the Sustainability Appraisal process.

Spatial strategy for housing

- 5.12 The district’s proposed 4000 contribution to wider unmet housing needs was included in the superseded November 2022 Publication Plan (Regulation 19) consultation following testing through plan preparation. However, following proposed changes to the NPPF published in December 2022, progress on the previous iteration of the plan was paused. In December 2023 the updated NPPF was published and confirmed that there is no requirement for Green Belt boundaries to be reviewed or changed when Local Plans are being prepared and that it is within authorities’ gift to choose to review Green Belt boundaries through the Local Plan where they feel that exceptional circumstances for doing so exist and these can be fully evidenced and justified. Furthermore, the delay to preparation of the Local Plan means that the Strategic Growth Study (2018) on which the previous 4,000 home contribution was based is no longer up to date. Proposals for updated evidence considering the housing market area shortfalls and potential growth locations are currently in discussion across the West Midlands Development Needs Group and South Staffordshire is committed to participating in updating the evidence base and considering its findings through future plan-making.
- 5.13 Given the change in circumstances, the council tested further spatial strategy options considering the ways in which housing growth could be distributed across the district, as detailed in the council’s Spatial Housing Strategy Topic Paper 2024. Unlike the majority of previous options tested that sought to deliver a 4000 home contribution derived from the 2018 Strategic Growth Study, the new options tested (Options H and I) considered different levels of growth based upon capacity led approaches that further limited Green Belt release compared to other options tested, and with a greater focus on the district’s most sustainable locations.
- 5.14 Having considered all of these different approaches previously tested in earlier iterations of the Local Plan, and their relative merits in the round, the council’s preferred approach is Spatial Option I - **a capacity-led approach focusing growth to sustainable non-Green Belt sites and limited Green Belt development in Tier 1 settlements well served by public transport.**
- 5.15 The main focus of the growth under this preferred strategy is on non-Green Belt land at suitable existing safeguarded land sites, sustainable Open Countryside sites, and limited brownfield sites available within settlement boundaries of sustainable settlements. The release of land within the wider Open Countryside has regard to *“the consequences for sustainable development of channelling development ... towards locations beyond the outer Green Belt boundary”*, in accordance with the NPPF. New allocations in the Open Countryside are therefore focused into suitable and potentially deliverable land adjacent to Tier 1 settlements and neighbouring towns.

- 5.16 Spatial Option I does not avoid Green Belt release, despite national policy allowing for such an approach and indicating any Green Belt release is solely the choice of the council. However, Spatial Option I does propose to limit Green Belt allocations to suitable sites in areas of the district best served by public transport, which the NPPF specifies are to be given first consideration for Green Belt release. Local evidence shows the district's Tier 1 settlements are the areas best served by public transport in the district, particularly where these transport links offer sustainable commuting patterns into the neighbouring Black Country and Birmingham conurbation. Given this, at the strategic level, it is concluded that exceptional circumstances exist to release Green Belt for housing at the Tier 1 settlements well served by public transport. This is expanded on further in the council's Green Belt Exceptional Circumstances Topic Paper 2024.
- 5.17 In summary Spatial Option I represents a sound and sustainable strategy for accommodating the required amount of housing in the district by 2041 that best balances the district's growth opportunities with national policy and the district's constraints. The strategy recognises the pressing need to deliver additional housing, whilst balancing this against the constraint that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.

Site Assessment

- 5.18 Previous spatial strategy options tested through plan preparation sought to find sites to meet a 'top down' housing requirement (i.e. own needs + 4000 homes). However, under the preferred strategy (Option I) based on a capacity led approach of limiting Green Belt to the most sustainable settlements, the housing target is derived through the determination of the most sustainable housing sites through the council's Housing Site Assessment Topic Paper 2024.
- 5.19 These site assessments reflect the preferred spatial strategy of proposing sustainable non-Green Belt development (i.e. sustainable Open Countryside sites, safeguarded land and brownfield sites) and limited Green Belt release at suitable sites at the Tier 1 settlement, where these sites are free from significant constraints and are in walking distance of these settlements train stations. However, these site assessments also include assessment of reasonable alternative Green Belt site options in other areas of the district (i.e. Tier 2-4 settlements and areas of search for urban extensions). This ensures that the site-specific merits of reasonable alternatives to the council's preferred strategy have been fully considered before final decisions are made on proposed allocations.
- 5.20 Following the site assessment process, the council has concluded that the exceptional circumstances for Green Belt boundary changes exist at the site-specific level for the Green Belt allocations at the Tier 1 settlements, based on the strategic approach taken and their individual merits, as they are assessed as the most suitable options. Exceptional circumstances do not exist for other reasonable alternative Green Belt site options assessed through the site assessment topic paper.

The housing target

5.21 The outcome of this site assessment process confirmed that there were suitable sites available to deliver the spatial strategy (spatial option I). The capacity of these sites is sufficient to meet our own need plus a proportionate 640 dwelling contribution towards unmet needs of the GBBCHMA. The specific elements of the housing target are set out below:

South Staffordshire’s own housing need using the government’s standard method (2023-2041)	4086
Additional housing to contribute towards the unmet needs of the GBBCHMA (2023-2041)	640
Total number of dwellings to be planned for	4726

Table 7: Housing Target

5.22 The council’s final preferred strategy seeks to deliver a balance of housing sites across the district, balancing the need for housing growth early in the plan period and for 10% of housing growth to be delivered on sites of less than 1 hectare, with the need for larger sites to deliver growth later in the plan period. The distribution of housing by settlement/area is set out below.

Spatial Housing Strategy 2023 - 2041		Indicative minimum dwelling numbers 2023-2041 ⁴		
Location	Total proportion of housing delivery	Existing planning permissions and allocations	Safeguarded land	New allocations
The district's rural area				
Tier 1 villages	60.6%	419	890	1844
Penkridge	24.8%	93	88	1109
Codsall/Bilbrook	24.5%	110	584	581
Cheslyn Hay/Great Wyrley	11.3%	216	218	154
Tier 2 villages	17.6%	299	614	0
Wombourne	5.7%	16	280	0
Brewood	1.2%	1	63	0
Kinver	2.8%	61	82	0
Perton	7.1%	220	150	0
Huntington	0.8%	2	39	0
Tier 3 villages	4.4%	128	100	0
Essington	1.2%	60	0	0
Coven	1.0%	3	48	0
Featherstone	0.8%	8	35	0
Shareshill	0.0%	2	0	0
Wheaton Aston	0.6%	30	0	0
Pattingham	0.5%	9	17	0
Swindon	0.3%	16	0	0
Tier 4 villages	0.6%	30	0	0
Growth in other rural locations and Tier 5 settlements	3.7%	194	0	0
Areas adjacent to neighbouring towns and cities				
South of Stafford at Land at Weeping Cross (Penkridge North East and Acton Trussell Ward) (A34 corridor)	1.6%	0	0	81
Other sources of supply				
Windfall development on small sites	11.5%	600	0	0

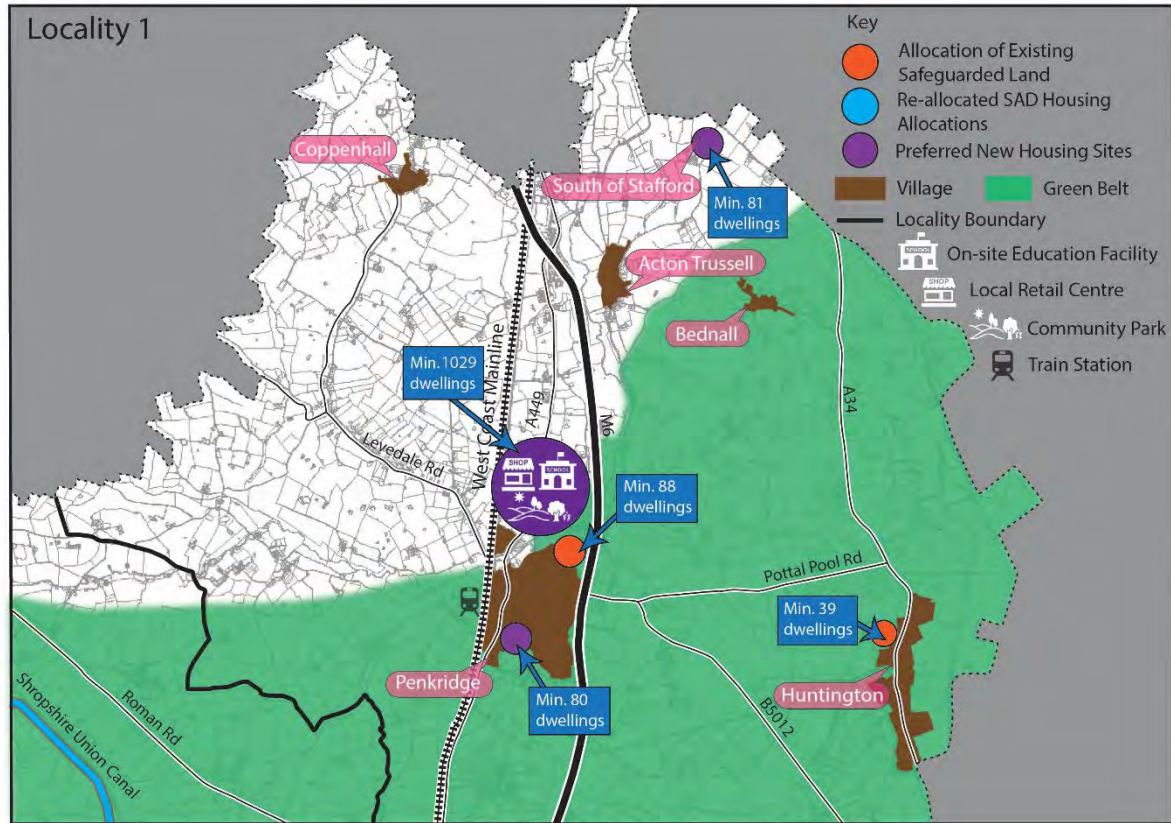
Table 8: How housing growth will be distributed across the district

⁴ These figures incorporate planning permissions granted since 2023 as well as allocations and safeguarded land from the council's adopted Site Allocations Document (2018) that have yet to come forward

- 5.23 In total, **this distribution of growth exceeds the minimum amount of land release required to meet the district’s 4726 dwellings housing target.** This will help the plan to meet the national policy requirement to respond to changing circumstances in the plan period and demonstrate plan flexibility. The housing numbers for each village/broad location are influenced by the capacity of sites considered suitable for allocation, as determined through the housing site assessment topic paper.
- 5.24 The sections that follow set out the strategy for delivering our housing growth in different areas of the district. The diagrams and descriptions that follow summarise only the locations that will be the focus for housing allocations. They do not include existing planning permissions within the district, which make up the remainder of the housing growth for the plan period up to 2041, as set out in Table 8.

Housing growth in Locality 1

- 5.25 The diagram below summarises where new housing growth will be delivered in Locality 1 (the north of the district).



Penkridge

- 5.26 Housing growth in this part of the district will be driven by a large-scale extension in the Open Countryside to the north of Penkridge. This larger scale development will deliver significant housing growth alongside a mix of other uses, including a new first school, local retail and a country park. This recognises the recommendations for a large-scale extension north of Penkridge in the GBBCHMA Strategic Growth Study, the non-Green Belt land available in this area of the village and the greater level of services and facilities in Penkridge compared to other villages in the district, including access to a railway station. The council has also proposed an additional amount of limited Green Belt release to the south of the village, recognising Penkridge's status as a Tier 1 settlement and the sustainability of this location compared to other areas of the district.
- 5.27 The delivery of the existing non-Green Belt safeguarded land in the village will also be brought forward, to ensure that sustainable non-Green Belt sites in the district are delivered.

Southern Edge of Stafford (A34 corridor)

- 5.28 This location will not be a focus for larger-scale housing growth. This recognises the sensitive landscape and potential highways concerns that larger scale growth in this location could cause, as well as the lack of unmet housing needs in Stafford and the location’s remoteness from areas where unmet needs are generated. Instead, a smaller scale extension to the adjacent town of Stafford will be delivered in this area, which will ensure the sustainable delivery of non-Green Belt housing land in the district.

Huntington

- 5.29 Housing growth in the village will be limited to existing planning permissions and the safeguarded land previously identified adjacent to the village. This approach recognises that Huntington is a Tier 2 settlement and therefore Green Belt release would not align with the spatial strategy which focuses Green Belt release only on the most sustainable Tier 1 settlements. This also recognises the relative level of services and facilities in Huntington compared to some other settlements in the district and potential for impacts on the nearby Cannock Chase AONB.

Housing growth in Locality 2

- 5.30 The diagram below summarises where new housing growth will be delivered in Locality 2 (the north-west of the district).



Brewood

- 5.31 Housing growth in the village will be limited to existing planning permissions and the safeguarded land previously identified adjacent to the village. This approach recognises that Brewood is a Tier 2 settlement and therefore Green Belt release would not align with the spatial strategy which focuses Green Belt release only on the most sustainable Tier 1 settlements. This also recognises the historic character of the village and relative level of services and facilities in Brewood compared to some other settlements in the district.

Coven

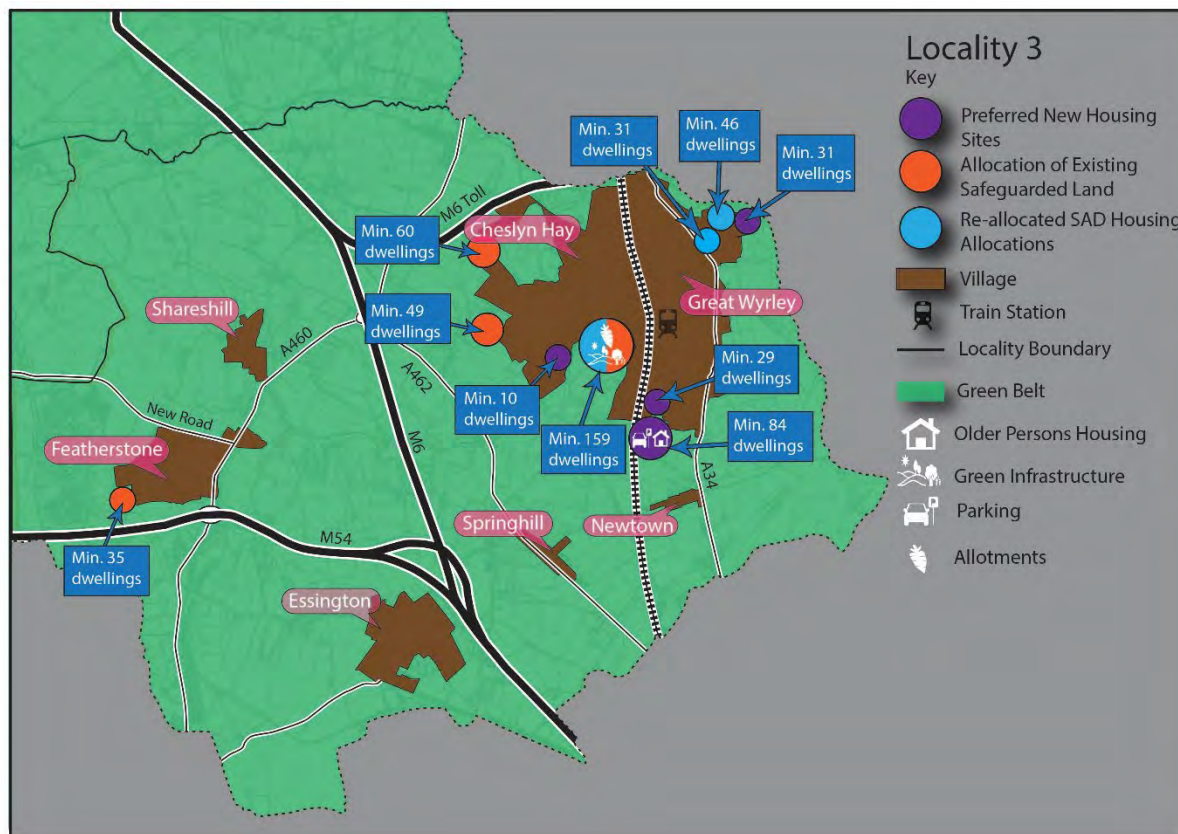
- 5.32 Housing growth in the village will be limited to existing planning permissions and the delivery of the safeguarded land adjacent to the village. This approach recognises that Coven is a Tier 3 settlement and therefore Green Belt release would not align with the spatial strategy which focuses Green Belt release only on the most sustainable Tier 1 settlements. This also recognises the limited level of services and facilities in Coven compared to some other settlements in the district.

Wheaton Aston

- 5.33 Housing growth in the village will be delivered through limited land release to deliver an allocation of an existing allocated site to the south of the village. This approach recognises the village’s relatively limited services and facilities, concerns raised by a statutory body and a lack of additional suitable non Green Belt options when considering sites through the site assessment process.

Housing growth in Locality 3

5.34 The diagram below summarises where new housing growth will be delivered in Locality 3 (the north-east of the district).



Cheslyn Hay/Great Wyrley

5.35 New housing growth in this area will be increased through the delivery of new allocations, which will be directed to less constrained site options around the two villages. These will be delivered alongside the existing allocated and safeguarded housing sites dispersed around the two villages.

5.36 The delivery of new housing allocations in Cheslyn Hay/Great Wyrley recognises the greater level of services and facilities to support local growth in these villages and the potential for additional allocations to be made to address the acute local need for specialist elderly housing in this location. Unlike other Tier 1 settlements (Penkrigde & Codsall/Bilbrook), growth in Cheslyn Hay/ Great Wyrley is tempered by the site-specific constraints affecting numerous site options in this area.

Featherstone & Shareshill

5.37 Housing growth around the village will be limited to existing planning permissions, and the delivery of the safeguarded land adjacent to Featherstone. Green Belt release is not proposed in this area, recognising the villages Tier 3 status and that

this would not align with the spatial strategy which focuses Green Belt release only on the most sustainable Tier 1 settlements.

Housing growth in Locality 4

- 5.38 The diagram below summarises where new housing growth will be delivered in Locality 4 (the central area of the district).



Codsall/Bilbrook

- 5.39 Housing growth in this part of the district will be largely focused on Codsall/Bilbrook. Increased allocations around the village will deliver housing growth alongside a mix of other uses, including a new first school, local retail and strategic green infrastructure. This recognises the recommendations for proportionate dispersal around Codsall/Bilbrook in the GBBCHMA Strategic Growth Study and the greater level of services and facilities in this area compared to other villages in the district, including access to two railway stations. The level of growth to be delivered is also aligned to the level of growth advised by the Education Authority to deliver an appropriately sized First School in this location whilst avoiding creating capacity issues at the Middle and High School level. It also offers opportunities to deliver additional station car parking at Codsall.

Perton

- 5.40 Housing growth in the village will be limited to existing planning permissions and the safeguarded land previously identified adjacent to the village, with no additional Green Belt release proposed. This approach recognises that Perton is a Tier 2 settlement and therefore Green Belt release would not align with the spatial

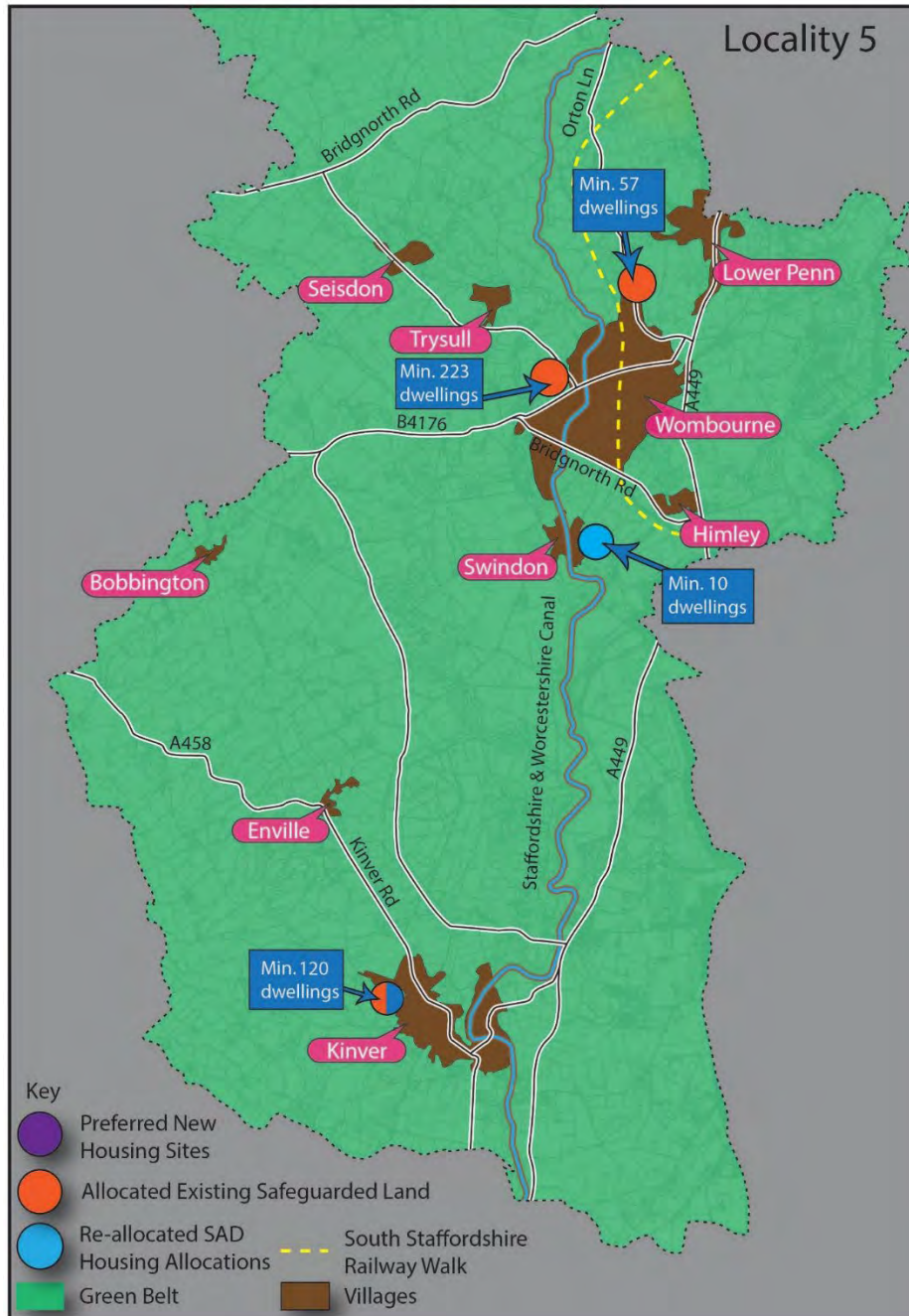
strategy which focuses Green Belt release only on the most sustainable Tier 1 settlements. It is also recognised that highways concerns and proximity to education are also factors that limit suitable site options.

Pattingham

- 5.41 Housing growth in the village will be delivered through the delivery of the safeguarded land identified adjacent to the village, with no additional Green Belt release proposed. This approach recognises that Pattingham is a Tier 3 settlement and therefore Green Belt release would not align with the spatial strategy which focuses Green Belt release only on the most sustainable Tier 1 settlements. This also recognises the limited level of services and facilities in Pattingham compared to some other settlements in the district.

Housing growth in Locality 5

5.42 The diagram below summarises where new housing growth will be delivered in Locality 5 (the south of the district).



Wombourne

5.43 Housing growth in the village will be delivered through the delivery of the safeguarded land identified adjacent to the village, with no additional Green Belt release proposed. This approach recognises that Wombourne is a Tier 2 settlement and therefore Green Belt release would not align with the spatial strategy which

focuses Green Belt release only on the most sustainable Tier 1 settlements. This recognises that unlike the Tier 1 settlements, Wombourne does not have rail access in walking distance that can offer greater sustainable access to employment and services.

Kinver

- 5.44 Housing growth in the village will be delivered through the delivery of the safeguarded land identified adjacent to the village, with no additional Green Belt release proposed. This approach recognises that Kinver is a Tier 2 settlement and therefore Green Belt release here would not align with the spatial strategy which focuses Green Belt release only on the most sustainable Tier 1 settlements. This also recognises the historic character of the village and relative level of services and facilities in Kinver compared to some other settlements in the district.

Swindon

- 5.45 Housing growth in the village will be delivered through a small existing site allocation. The safeguarded land in the village is not proposed for allocation as following its re-examination through our housing site assessment topic paper, is not considered suitable to accommodate a well designed scheme layout. This approach also recognises that Swindon is a Tier 3 settlement and therefore Green Belt release here would not align with the spatial strategy which focuses Green Belt release only on the most sustainable Tier 1 settlements.

Gypsies and Travellers

- 5.46 It is also a requirement of the Local Plan to assess and plan to meet the housing needs of different groups of the community, including Gypsies, Travellers and Travelling Showpeople. The government's Planning Policy for Traveller Sites (PPTS) 2015 details how travellers' housing needs should be assessed for those covered by the definition in Annex 1 of the 2012 PPTS. The focus of Gypsy, Traveller and Travelling Showpeople policies in this plan is therefore to make provision for those traveller families that meet the definition, with the housing needs of those not falling within this definition met through general needs housing policies.
- 5.47 In line with national policy, the needs for families have been assessed through the Gypsy and Traveller Accommodation Assessment (GTAA) update 2024 and Pitch Deliverability Study (2021). This evidence demonstrates that need is being generated by existing families. Some of this is current need as a result of being on an unauthorised pitch and overcrowding. However, the vast majority of need is generated through household formation derived from the demographics of residents and teenagers on sites needing a pitch of their own within the next five years.
- 5.48 Due to this, the council's strategy for new Gypsy, Traveller and Travelling Showperson provision will be to continue to deliver privately owned sites/pitches to meet the needs of existing families. The evidence supports an approach therefore of

looking to allocate existing temporary or unauthorised sites to permanent (subject to other planning considerations) and looking to intensify and extend existing sites to meet identified family need, rather than allocating wholly new sites that may have been suggested by landowners without any connection or agreement to meet local needs, and where deliverability is more uncertain. This approach will see the continued concentration of traveller pitches where sites have historically been consented on appeal in the north of the district predominantly along the A449 and A5 transport corridors. It is currently not possible to test an alternative distribution of traveller pitches that would disperse pitches more widely across the district due to a lack of deliverable alternative pitch options elsewhere in the district.

- 5.49 The GTAA update (2024) has identified a need for 142 pitches to 2042 from families that meet the definition of a Gypsy and Traveller. However, assuming that 84% of ‘undetermined household’ (where interviews were not secured) would need a pitch, then this requirement could rise to 162 pitches up to 2042. The GTAA update identified a 5-year need (2024-2028) of 92 pitches.

Employment

The district’s employment needs

- 5.50 It is the role of the Local Plan to consider the district’s employment needs and plan for employment growth over the plan period, taking account of the evidence of need and the existing pipeline of employment land. A partial update of the Economic Development Needs Assessment (EDNA) was published in 2024 to inform the emerging Local Plan and was an update to a previous EDNA published in 2022.
- 5.51 The EDNA 2022 and 2024 update, in accordance with the PPG, analysed the socio-economic landscape of the district (including around employment, business development, demographics and labour markets) and concluded that the local economy in South Staffordshire was healthy and was still benefiting from investment particularly as a result of strategic site delivery in the district. The EDNA also analysed which authorities South Staffordshire had the strongest economic links with, and from this identified a Functional Economic Market Area (FEMA) comprising of South Staffordshire, Cannock, Dudley, Stafford, Walsall and Wolverhampton.
- 5.52 The study’s main focus was to draw together the market intelligence, economic forecasts and other relevant data to conclude on the employment land needs of the district up until 2041. The study included detailed analysis of employment projections on a sector-by-sector basis utilising data from the three main forecasting houses. The study adjusted the Experian forecast to arrive at a ‘LEP based Growth Scenario’ and following a series of further adjustments (e.g. building in plan flexibility such as projected employment losses and an increased margin for frictional vacancy), arrived at an objectively assessed employment land need figure of 62.4ha up to 2041.

- 5.53 The study also undertook analysis on the impact of West Midlands Interchange (WMI) on the district, including on the demand for employment, as well as considering the proportion of WMI that could contribute towards the supply of employment land for South Staffordshire given the strategic nature of the site. This concluded that 18.8ha of WMI would contribute towards the district’s supply of employment land to meet the projected demand.
- 5.54 The EDNA undertook further analysis by examining the supply/demand balance for the district, in order to inform the amount of employment land that would need to be allocated through the Local Plan. It considered the supply of employment land at the base date of April 2023 (circa 90ha, excluding WMI) and explored how this would likely be split between strategic and non-strategic employment land supply. Following consideration of the supply/demand balance specifically for strategic sites, it was concluded what proportion of the surplus strategic employment land could be attributed to providing towards sub regional supply and what proportion could be considered providing towards South Staffordshire’s supply, informed by the labour demand forecasts. It concluded that in terms of strategic employment land, 27.6ha of surplus land (excluding WMI) could reasonably be attributed to cross boundary unmet needs in the Black Country FEMA. This increases further to 45.2ha when factoring in an additional strategic allocation at M6 Junction 13, Dunston (17.6ha) that boosts the supply pipeline to ensure plan flexibility and that the pipeline of sites more closely reflect recent take up. Meanwhile, the supply-demand balancing exercise that could be attributed to South Staffordshire, taking on board both strategic and non-strategic employment land, concluded there is sufficient supply to meet the council’s employment needs based on South Staffordshire’s forecast labour demand, with supply/demand broadly in balance. Overall, the district can meet its own employment land needs, together with making a proportionate contribution to unmet needs in the Black Country.

Unmet employment needs from the wider functional economic area

- 5.55 National planning practice guidance requires authorities consider the ‘most appropriate geography’ to prepare policies for employment and require authorities to define their ‘best fit’ Functional Economic Market Area. Given this, it is over the South Staffordshire FEMA geography that it is considered the most appropriate basis for considering our role in meeting cross boundary employment needs.
- 5.56 Of the other authorities within the South Staffordshire FEMA, Cannock Chase District Council (CCDC) are also in the process of preparing their new Local Plan. In February 2024 they consulted on their Pre-Submission (Regulation 19) consultation which indicated that up to 74ha of employment land will be provided over the plan period up to 2040 to meet Cannock’s employment needs. There is currently no indication that Cannock are unable to meet this need within their administrative boundary, with the exception being confirmation that they require 10ha from WMI. Stafford Brough consulted on their Preferred Options document in October 2022 which confirmed around 156ha of employment land supply over their emerging plan

period. There is no indication to date that Stafford will not be able to meet its own development needs.

- 5.57 The Black Country authorities of Dudley, Sandwell and Wolverhampton are also currently preparing their Local Plans and their employment evidence has identified a self-contained Black Country FEMA covering the four Black Country authorities, albeit with strong and moderate links to a number of neighbouring authorities, including strong links with South Staffordshire. The Black Country authorities latest Employment Land Needs Assessment (October 2023) identifies a shortfall of 153ha of employment land. That study recommends that the Black Country local authorities should continue to engage through the Duty to Cooperate with neighbouring authorities that have a strong or moderate functional economic relationship with the Black Country to consider this shortfall.
- 5.58 Site assessment of employment site options (existing sites with available land parcels and new site options) have been undertaken, which has re-confirmed that those sites assessed as part of the supply/demand exercise in the EDNA update (2024) and that did not have full or reserved matters planning permission at the base date of April 2023 are suitable for allocation. As such, the findings of the supply/demand exercise and the conclusion in the EDNA update (2024) that 27.6ha (excluding WMI and M6 Junction 13, Dunston) of strategic employment land is available for unmet cross boundary needs has been confirmed. In addition, WMI represents a significant supply of employment land within the district that will come forward within the plan period. As confirmed through the EDNA 2022 and 2024 update, South Staffordshire requires 18.8ha of WMI within our supply to meet our forecast labour demand, leaving a considerable proportion of the site available to meet cross boundary needs. The Black Country authorities commissioned a report considering the proportion of WMI that could be considered towards their needs based upon projected population change. This identified a minimum 67ha ‘claim’ from WMI for the Black Country authorities, which when taken alongside the 45.2ha⁵ surplus of strategic employment land means that 112.2ha of employment land in South Staffordshire is available for strategic cross boundary unmet needs from the Black Country (circa 153ha shortfall), subject to agreement through a Statement of Common Ground.

Strategic Employment Sites

- 5.59 The issue of strategic employment delivery across the wider West Midlands region has started to be explored most recently through the West Midlands Strategic Employment Sites Study (WMSESS) 2021. The WMSESS 2021 was commissioned by Staffordshire County Council, Black Country LEP, Greater Birmingham and Solihull LEP and Coventry and Warwickshire LEP with local planning authorities in the region not directly involved in the study. In this context, the study’s primary focus was around engagement with the private sector to gauge market demand for new strategic employment sites, to examine recent take up, and to identify broad areas of market demand. It did not provide a full assessment of need (in terms of

⁵ 27.6ha (identified as surplus in the EDNA update) + 17.6ha (M6 Junction 13, Dunston) = 45.2ha.

floorspace) that could be attributable across the study area, however it did conclude that there was considerable demand for strategic employment site opportunities across the region and identified a number of broad locations around key junctions, including junctions on the M6 and M54 in South Staffordshire.

Development Needs & Spatial Strategy to 2041

- 5.60 The development needs set out in Policy DS4, and spatial strategy set out in Policy DS5, describe how the district will meet its housing, Gypsy and Travellers and employment needs up to 2041; whilst sensitively managing other uses such as retail, agriculture and tourism. These are key strategic policies that set the framework for delivering growth through the Local Plan and provide details of how windfall developments will be considered that are proposed outside the Local Plan allocations process.

Policy DS4: Development Needs

During the plan period up to 2041, the council will promote the delivery of a minimum of:

- a) 4,726 homes over the period 2023-2041 to meet the district's housing target, whilst providing approximately 10% additional homes to ensure plan flexibility. This housing target includes the district's own housing requirement of 4,086 homes, plus a 640-home contribution towards unmet housing needs of the Greater Birmingham and Black Country Housing Market Area. The council will seek to demonstrate a 5 year housing land supply upon adoption of the plan.
- b) 107.45ha of employment land over the period 2023-2041 to ensure that South Staffordshire's identified need for employment land of 62.4ha is met, as well as making available a potential contribution of 45.2ha to the unmet employment land needs of the Black Country authorities.

18.8ha of West Midlands Interchange will contribute towards South Staffordshire's employment land supply with an additional minimum 67ha available towards the unmet employment land needs of the Black Country authorities, and which may increase depending on the employment land position of other local authorities in the site's market area. 10ha at WMI will also contribute towards Cannock Chase council meeting their employment land needs. The remaining land supply of West Midlands Interchange (WMI) will be considered with related authorities through the Duty to Co-operate.

- c) 37 new Gypsy and Traveller pitches. This is the number of pitch options that have been assessed as deliverable against a larger need of 162 pitches, primarily to meet the future needs of existing families within the district. The council has explored numerous options to meet this unmet need, including through ongoing Duty to Co-operate engagement with neighbouring authorities and promoters of

residential site allocations, as well as assessing the suitability of publicly owned land. The council will continue to work with Duty to Cooperate bodies to explore options for new or expanded public sites to meet this unmet need and will respond positively to windfall proposals that accord with Policy HC9.

Policies DS5, MA1, SA1, SA2, SA3, SA4 and SA5 set out how the above development needs will be delivered in a sustainable way that enhances the vitality of communities across South Staffordshire, supports economic growth, and which conserves and enhances the district's environmental assets. Delivery of new development will be monitored in line with the monitoring framework and the development needs set out above will be kept under review to inform whether a review of the Local Plan is required.

- 5.61 The spatial strategy and distribution the growth outlined in Policy DS4 is based upon a capacity led approach that focuses the majority of growth on the district's most sustainable settlements, with Green Belt release limited to these Tier 1 settlements. Non-Green Belt options have been maximised in line with national policy requirements with the limited number of suitable and deliverable brownfield site options in the district proposed for allocation as well as the reassessment of existing safeguarded land sites to confirm their suitability for allocation. Suitable sites in sustainable locations in the Open Countryside to the north of district are allocated, specifically adjacent the sustainable settlements of Penkridge and neighbouring Stafford. The spatial strategy also facilitates the delivery of key infrastructure where opportunities are presented (e.g. a new First School at Bilbrook).

Policy DS5 – The Spatial Strategy to 2041

During the plan period to 2041, the council will deliver a minimum of 4,726 dwellings

The aim will be to meet needs in a manner which builds on the district's existing infrastructure and environmental capacity, whilst recognising opportunities to deliver local infrastructure opportunities identified within the district. Throughout the district, growth will be located at the most accessible and sustainable locations in accordance with the settlement hierarchy set out below. The council will work with partners to deliver the infrastructure, facilities and services required to support this growth.

An integral part of the Strategy will be to ensure that growth is distributed to the district's most sustainable locations, avoiding a disproportionate level of growth in the district's less sustainable settlements, whilst also recognising that very limited growth in less sustainable areas may be appropriate in limited circumstances set out in the settlement hierarchy below. It will also seek to maintain and enhance the natural and historic environment and the local distinctiveness of the district and retain and reinforce the current settlement pattern.

Tier 1 settlements

The district's Tier 1 settlements are Penkridge, Codsall/Bilbrook and Cheslyn Hay/Great Wyrley. These settlements hold a wider range of services and facilities and have access to key rail corridors into the adjacent towns and cities upon which the district relies for its higher order services and employment. The sustainable growth of these larger rural settlements will be delivered through appropriate allocations made in the Local Plan, consisting of sustainable and deliverable non-Green Belt land and suitable Green Belt site allocations.

These Tier 1 settlements will continue to support windfall housing growth, employment development and service provision, where it is consistent with other Local Plan policies. Proposals for retail and small-scale office development should be directed into the centres identified in Policy EC8, in a manner which reflects their role and function.

Tier 2 settlements

The district's Tier 2 settlements are Wombourne, Brewood, Kinver, Perton and Huntington. These settlements hold a wider range of services and facilities than other smaller settlements in the district's rural area. The sustainable growth of these larger rural settlements will be delivered through appropriate allocations made in the Local Plan, consisting of suitable and deliverable non-Green Belt site allocations.

These Tier 2 settlements will continue to support windfall housing growth, employment development and service provision, where it is consistent with other Local Plan policies. Proposals for retail and small-scale office development should be directed into the centres identified in Policy EC8, in a manner which reflects their role and function.

Tier 3 settlements

The district's Tier 3 settlements are Essington, Coven, Featherstone, Shareshill, Wheaton Aston, Pattingham and Swindon. These settlements hold a smaller range of services and facilities than Tier 1 and 2 settlements and as such are given a lesser level of growth. Limited growth in these smaller rural settlements will be delivered through appropriate allocations made in the Local Plan, consisting of suitable and deliverable non-Green Belt site allocations.

The district's Tier 3 settlements will continue to support limited windfall housing and employment growth to assist in meeting local needs, where it is consistent with other Local Plan policies. Employment development will be small in scale and aim to maintain the vitality and viability of these communities. Proposals for retail and small-scale office development should be directed into the centres identified in Policy EC8, in a manner which reflects their role and function.

Tier 4 settlements

The district's Tier 4 settlements are Bednall, Bishops Wood, Bobbington, Dunston, Himley, Seisdon and Trysull. These settlements will continue to support very limited windfall housing growth to assist in safeguarding the limited services and facilities in

each village and to address local housing needs. Limited windfall housing growth will be supported only where it is consistent with other Local Plan policies.

Tier 5 settlements

The district's Tier 5 settlements are set out in the Rural Services and Facilities Audit 2021. These settlements are not intended to experience further housing or employment growth, owing to their poorer sustainability credentials, poorer public transport links and lack of services and facilities relative to other settlements within the district. New development in these locations will be limited to the conversion and re-use of redundant rural buildings to appropriate uses, in accordance with other development plan policies. On a case-by-case basis, the very limited redevelopment of previously developed land for housing may also be supported within these settlements where this would not increase unsustainable transport movements from the settlement in question and would not conflict with other Local Plan policies. Limited affordable housing to meet specified local needs in accordance with relevant Local Plan policies may also be supported.

The district's wider rural area

In the rural area outside of the district's existing settlements, the objective of the Spatial Strategy is to protect the attractive rural character of the countryside. To deliver this, new development will be restricted to particular types of development to support biodiversity, carbon sequestration, renewable and low carbon technologies, tourism, sport and recreation and the local rural economy and rural diversification, where this is consistent with other Local Plan policies. Other than the forms of residential development identified as being acceptable in rural areas in the NPPF, isolated housing growth away from the district's settlements will not be supported.

Growth adjacent to the town of Stafford

Housing growth will be located at the strategic allocation made adjacent to Stafford through this Local Plan, in order to facilitate sustainable growth at a non-Green Belt location. This is:

- *Land at Weeping Cross, west of the A34*

The district's freestanding strategic employment sites

Outside of the district's rural settlements, support will continue to be given for employment and economic development at the district's six freestanding strategic employment sites (West Midlands Interchange, i54 South Staffordshire, Hilton Cross, ROF Featherstone/Brinsford, Four Ashes and M6 Junction 13, Dunston). Existing and proposed employment sites throughout the district will be safeguarded for their respective uses, in accordance with other Local Plan policies.

Gypsy, Travellers and Travelling Showpeople sites

The district will seek to meet existing Gypsy, Travellers and Travelling Showpeople needs as far as possible, pursuing a strategy of meeting evidenced needs where they arise throughout the district. To deliver this strategy, allocations in the Local Plan will

be used to allow for the sustainable intensification, extension and regularisation of suitable existing sites, in a manner consistent with other development plan policies and local evidence on pitch deliverability. Windfall proposals for additional pitches will be considered on a case-by-case basis against the criteria in Policy HC9 and other relevant Local Plan policies.

Delivering the Strategy

The Spatial Strategy will be delivered through allocations made in this Local Plan and associated planning policies, ensuring development is sustainable, enhances the environment and provides any necessary mitigating or compensatory measures to address harmful implications. In all cases development should not conflict with the policies of the development plan.

Part B: Site Allocations

6. Site Allocations

Housing

- 6.1 Following consultation on the Spatial Housing Strategy and Infrastructure Delivery (SHSID) consultation in October 2019, site assessments were undertaken using the site assessment criteria consulted on. Following the 2022 Publication Plan (Regulation 19) consultation these site assessments were revisited, with all ‘suitable’ and ‘potentially suitable’ sites in the 2024 Strategic Housing Land Availability Assessment subject to more detailed assessment against a range of planning considerations. This resulted in all sites at Tier 1-4 settlement and urban edge locations being assessed against a range of planning considerations, and this ‘long list’ of sites were also those subject to Sustainability Appraisal as ‘reasonable alternative’ sites for assessment. The assessment entailed considering a balance of top-down strategic factors (e.g. conformity with the spatial strategy) and bottom-up site-specific factors (e.g. heritage impacts). The full methodology, factors considered, and results of the site assessment process for all site options can be found in our Housing Site Assessment Topic Paper 2024.
- 6.2 This site selection process identified the suitable sites to deliver our revised constraints-led strategy between 2023-41. This entails limiting growth to suitable and deliverable non-Green Belt land and suitable Green Belt sites at tier 1 settlements. The assessment and identification of suitable allocations led to the council’s housing target of **4,726 dwellings** between 2023 and 2041, whilst providing extra land to ensure the plan is flexible to changing circumstances.
- 6.3 Where possible, the likely infrastructure requirements for both large scale and smaller housing sites have been identified through engagement with infrastructure providers and site promoters. These are set out in Policies SA1-SA2 and Appendix B for the district’s largest site allocations, and in Policy SA3 and Appendix C for the small to medium sized site allocations. Further details on the delivery of these infrastructure items (e.g. estimated costs, timescales for delivery) are set out in the Infrastructure Delivery Plan (2024).
- 6.4 Where more non-standard infrastructure requirements are proposed and are not reflected in the standard site typologies in the Local Plan Viability Study (2024) then these sites have been subject to site specific viability assessments to confirm the necessary infrastructure is deliverable alongside policy requirements with an associated cost set out in this Local Plan.

Strategic Master Plan Locations

- 6.5 A significant amount of housing growth in South Staffordshire up to 2041 will be delivered by two key strategic sites, which have been identified through the site selection process. It is important to properly master plan sites of this scale, which

need to be supported by appropriate new infrastructure and will influence the character of the area for years to come. To support this, the council has prepared an indicative concept plan, vision and objectives for both sites, which have been prepared in collaboration with the site promoters, stakeholders and infrastructure providers. These will form the basis for more comprehensive masterplans and design codes required as part of the planning process.

- 6.6 These strategic master plans will need to be developed for each site in line with the requirements set out in Policy MA1. The plan also includes site specific policies (SA1-SA2) for both strategic sites that detail a number of site-specific requirements that will need to be incorporated through the iterative process of developing the strategic master plans. It will be a requirement that the council signs off the strategic master plans, and this will be done by the council's Corporate Director of Place and Communities, through consultation with the relevant Cabinet Member and Chairman of Planning Committee.

Policy MA1 – Masterplanning Strategic Sites

The council considers high quality design to be a key component of achieving sustainable development and will support new development where it is well designed, located and responsive to local context.

A comprehensive and deliverable site-wide Strategic Master Plan (SMP) for the two strategic sites set out in Policies SA1 and SA2 will be prepared by the landowners/promoters, in collaboration with and to be approved by the council. This policy shall also apply to large scale or complex applications on sites not allocated in the plan.

To ensure strategic sites are comprehensively planned and delivered, planning applications should be preceded by and consistent with a Strategic Master Plan which has been agreed in writing by the council's Corporate Director of Place and Communities. Where applications have been submitted to the council prior to the adoption of this Plan, a Strategic Master Plan should be agreed with the council prior to or as part of the grant of planning permission.

The scope and contents of the site-wide Master Plans will be confirmed by the council in pre-application discussions and will be based upon and informed by community and stakeholder engagement (the exact nature will be agreed as part of pre-application discussions) and the relevant site-specific vision, objectives and concept plan as set out in Policies SA1 and SA2, to ensure that development for the whole site is delivered in a comprehensive and co-ordinated manner and is of sufficient quality. The site-wide Master Plans will be a material consideration in the determination of future planning applications related to the relevant site(s) and adherence to it/them will be secured through relevant planning conditions and/or legal agreement. The SMP will include the following:

- a) **Vision and Objectives** based on the content of the relevant strategic site policy as set out below, with any further iteration/update following further consultation and technical evidence
- b) **Baseline Evidence** setting out the key constraints and opportunities in relation to the site and reference to relevant supporting technical documentation.
- c) **Land Use Framework** addressing the key broad extent, type and mix of development uses across the site (including any public open space)
- d) **Movement Framework and Access Strategy** including:
 - a clear route hierarchy of primary and secondary streets, pedestrian and cycle routes which plug into existing and proposed networks and key destinations within and beyond the site boundary
 - potential bus circulation routes and bus stops (including service diversion where appropriate and infrastructure considerations for electric bus provision)
- e) **Green Infrastructure Framework** including:
 - A clear hierarchy of public open space throughout the site, including indicative roles and functions of different spaces (e.g. play, biodiversity/natural capital, SuDS, recreation)
 - Indicative ecological mitigation and opportunities for delivering biodiversity net gain on the site
 - Opportunities to integrate SuDS within the site's green infrastructure
 - Details of open space typologies in accordance with the most up-to-date evidence and standards and informed by engagement with the local community/Parish Council (including allotments/community gardens/forest schools etc., if required)
 - Utilisation and retention of existing landscape features and key views into and out of the site to create a distinctive and visually sensitive character to the development that links into the green infrastructure network beyond the site's boundaries
- f) **Urban Design Framework** creating a cohesive urban structure for the site including:
 - Character areas
 - Gateways, landmarks, key views and nodes
 - Community hubs
 - Important frontages
 - Sensitive areas
- g) **Comprehensive Spatial Framework Plan** drawing together the above frameworks to demonstrate the overall placemaking strategy for the site
- h) **Development Phasing, Planning and Infrastructure Delivery Strategy** collating information regarding the phasing and delivery of the following items:
 - On and offsite highways mitigation

- Public transport provision
- Active travel links
- On and offsite education provision
- Open space, biodiversity / habitat mitigation and enhancement and other green infrastructure (e.g. playing fields/allotments)
- Flood risk mitigation, drainage and SuDS infrastructure
- Sports and recreation facilities
- Community facilities
- Utilities
- Affordable housing provision
- Healthcare (onsite or offsite)

In addition, this should set out the expectations for future planning applications and the broad timing and triggers for the delivery of critical infrastructure to deliver comprehensive and co-ordinated placemaking.

- i) **A strategy for site wide Design Coding:** setting out the approach to formulating provably popular site wide and area (as appropriate) design coding, in keeping with the requirements of the National Model Design Code and accompanying National Model Design Guidance.
- j) **Community and key stakeholder consultation/engagement strategy and outcomes for the site** setting out who has been engaged, in what way and how this has informed the SMP

Development proposals should be consistent with other Local Plan policies.

Implementation

Local/national Funding	Development Management	Partners	Section 106/278 agreement	Masterplan framework
	✓	✓	✓	✓

Land East of Bilbrook

- 6.7 A strategic site has been identified to the East of Bilbrook, reflecting the area’s public transport infrastructure, proximity to employment opportunities and the services and facilities available in the wider Codsall/Bilbrook area. Policy SA1 and the Vision and Objectives for the site aim to respond to the site’s context and key requirements to ensure a high quality, sustainable new neighbourhood is created.

Policy SA1 – Strategic development location: Land East of Bilbrook

A strategic site for major housing growth is identified at Land East of Bilbrook in the location shown in Appendix B of this document. The key spatial principles for delivering this level of housing growth at Land East of Bilbrook are illustrated through the indicative Concept Plan for the site shown in Appendix F. The development should be delivered in accordance with the requirements of other policies in this Local Plan and an approved site wide Strategic Master Plan as required under Policy MA1, informed by the Concept Plan, vision and objectives for the site contained within this document and requirements set out within the Infrastructure Delivery Plan. The site-specific requirements should include:

- a) A minimum of 750 new homes, including affordable housing and a specialist elderly housing element (e.g. sheltered or extra care) of at least 40 units in accordance with other policies within the local plan;
- b) A Community Hub focused around a central area of communal green space, well connected to the site wide green infrastructure network, to contain:
 - Small local convenience retail to serve the day to day needs of the neighbourhood
 - Flexible community space
 - A new first school (1.3ha)
- c) Vehicular accesses onto Pendeford Mill Lane, Lane Green Road and Barnhurst Lane and appropriate public transport provision to support sustainable travel from the scheme;
- d) High quality active travel links through and beyond the site, including to the recreational green space to the north, local shops and rail station in Bilbrook and the Sustrans network to the east;
- e) An integrated and connected network of accessible green and blue infrastructure informed by the indicative layout on the Concept Plan, in accordance with the most up-to-date evidence and standards and informed by engagement with the local community/Parish Council, providing for high quality Sustainable Drainage Systems, open space, play, biodiversity net gain and active travel, including a large central green space at the heart of the development and additional compensatory

Green Belt improvements on the land identified as off-site green infrastructure to the south of the site in accordance with Policy DS2;

- f) Enhancement of and provision of additional playing pitches and associated facilities in the existing recreational open space to the north of Pendeford Mill Lane, including improved active travel links from the new neighbourhood;
- g) Any necessary historic environment mitigation for the site, as identified in the council's Historic Environment Site Assessment Stage 2 (2022), including setting back development from the site's eastern edge and reinforcing planting within that boundary and any mitigation required as a result of archaeological investigations;
- h) Necessary contributions towards offsite infrastructure, including highways and active travel mitigation measures, education, leisure and health provision;
- i) Development of the site should be in accordance with the recommendations set out in the Level 2 Strategic Flood Risk Assessment detailed site summary table and should provide a site-specific Flood Risk Assessment which shows development laid out as to avoid the floodplain and finished floor levels 600mm above the 1 in 100 plus climate change flood level; and
- j) Consideration of potential amenity issues and any mitigation requirements as a result of proximity to existing commercial units to the east of the site.

Vision

- 6.8 Land East of Bilbrook will create the new arrival point into the existing settlement of Bilbrook, providing a distinctive and attractive gateway and sensitive edge to the countryside. It will be a sustainable, well-connected neighbourhood for Bilbrook, centred around a new first school together with flexible community/employment space, potential convenience shopping and a central green, with residents having excellent sustainable links to existing facilities and employment opportunities, such as the shops/amenities on Bilbrook Road, the nearby train station, the enhanced Bilbrook playing fields and i54. The new neighbourhood will have a diverse character, focussed around new and existing green and blue infrastructure, with green corridors and effective flood management creating a network of multi-functional communal space. The homes will be highly energy efficient and sustainable, providing a variety of styles and accommodation to suit a range of established needs. The development will focus on achieving high environmental standards, energy efficiency and a net zero carbon community.

Objectives

6.9 Environmental

Transport & Movement

- The new neighbourhood will contain a network of connected tree-lined streets, with strong cycling and walking routes within the site. This network will be well-connected through multiple access points to the surrounding area, including convenient access to sustainable travel infrastructure and key off site walking/cycling routes, such as the i54 Sustrans route 81 (A National Cycling Network protected route) and nearby Bilbrook train station.

Housing & Built Environment

- The new neighbourhood will contain a number of character areas, drawing inspiration from relevant smaller historic village cores in the surrounding area and responding positively and relating well to the site surroundings, such as the canal corridor, street hierarchy, greenspace to the south, countryside edge to the north and existing urban grain of Lane Green Road etc. There will be a variety and mix of house types to accommodate a range of people including first time buyers, young families and elderly persons, with a focus on high environmental standards, energy efficiency and a move towards a net zero carbon community.

Active, Inclusive and Safe

- A range of suitable homes will be provided to meet established needs in respect of size, type, tenure and affordability in order to realise a balanced community.

Environmentally Sensitive

- New safe and attractive walking and cycling routes will be provided that link to existing, nearby green and sustainable routes, such as the canal corridor, and the Sustrans route 81 and to the existing Bilbrook playing fields. Existing ecological features such as hedgerows will be maintained and wildlife habitat enhanced as part of the creation of high-quality Sustainable Drainage Systems (SuDS), that align with the new greenspace and green routes to create multi-functional amenity spaces and biodiversity corridors. A central green space will be created to form the heart of the neighbourhood and tree lined boulevards will create and attractive main route and promote biodiversity.

6.10 Social and Economic

Well served

- A new first school will be provided in a central location, adjacent the green space and accessible by walking and cycling as well as by motor vehicles. This will create a focal point for the neighbourhood, where other flexible space for community/local employment uses could be introduced. Local convenience retail will be provided in the new neighbourhood to cater for those local needs, with good walking and cycling links provided to Pendeford Mill Lane and Lane Green Road, enabling access to Bilbrook village centre.

Thriving:

- The new neighbourhood is located within easy reach of local businesses, i54 and Wolverhampton City Centre, where employment opportunities exist. The scheme will connect with and contribute towards the improvement of sustainable transport links to both key employment locations.

Well run:

- The existing and new residents within the community should be engaged to consider the future stewardship of the place and in particular the design, delivery and future management of the new facilities such as the neighbourhood centre/community space and green infrastructure network, including the potential for a future Community Trust to be established.

Implementation

Local/national Funding	Development Management	Partners	Section 106/278 agreement	Masterplan framework
	✓	✓	✓	✓

Land North of Penkridge

- 6.11 A strategic site has been identified to the North of Penkridge, reflecting the area’s public transport infrastructure, non-Green Belt location and the services and facilities available in the Penkridge area. Policy SA2 and the Visions and Objectives for the site aim to respond to the site’s context and key requirements to ensure a sustainable new neighbourhood is created.

Policy SA2 – Strategic development location: Land North of Penkridge

A strategic site for major housing growth is identified at Land North of Penkridge in the location shown in Appendix B of this document. The key spatial principles for delivering this level of housing growth at Land North of Penkridge are illustrated through the indicative Concept Plan for the site shown in Appendix F. The development should be delivered in accordance with the requirements of other policies in this Local Plan and an approved site wide Strategic Master Plan, as required under Policy MA1, informed by the Concept Plan, vision and objectives for the site contained within this document and the requirements of the Infrastructure Delivery Plan. The site-specific requirements should include:

- a) A minimum of 1,029 homes, including affordable housing and a specialist elderly housing element (e.g. sheltered or extra care) of at least 40 units in accordance with other policies within the local plan;
- b) A Community Hub focussed around community uses/provision with a strong relationship with primary movement through and within the site, well connected to the site wide green infrastructure network to contain:
 - A new first school (1.5ha)
 - Local convenience retail to serve the new neighbourhood
 - Other commercial floorspace to serve the day to day needs of the neighbourhood
 - Flexible community space
- c) A Community Park on the eastern side of the development.
- d) A transport strategy which includes consideration of accesses onto the A449, a gateway feature to the village on the site’s northern edge and appropriate public transport provision to support sustainable travel from the scheme;
- e) The provision of full-size sports pitches to national standard along with associated facilities to meet identified need.
- f) High quality active travel links through and beyond the site, including a north-south cycle link through the development and into the existing village centre and rail facilities to the south;

- g) An integrated and connected network of accessible green and blue infrastructure informed by the indicative layout on the Concept Plan, in accordance with the most up-to-date evidence and standards and informed by engagement with the local community/Parish Council, providing for high quality Sustainable Drainage Systems, open space, sport, biodiversity net gain and active travel, including an accessible central green space or spaces at the heart of the development and a riverside linear community park on the land identified to the east of the site;
- h) Any necessary historic environment mitigation for the site, as identified in the council's Historic Environment Site Assessment Stage 2 (2022), including retention of tree and hedgerow boundaries bordering the site and any mitigation required as a result of archaeological investigations;
- i) Necessary contributions towards offsite infrastructure, including highways and active travel mitigation measures, education, leisure and health provision ;
- j) Provide a site-specific Flood Risk Assessment which shows development laid out as to avoid the floodplain and finished floor levels 600mm above the 1 in 100 plus climate change flood level;
- k) Consideration of potential impacts on views from the Cannock Chase Area of Natural Beauty (AONB) and any necessary mitigation requirements; and,
- l) Consideration of potential amenity issues and any mitigation requirements as a result of proximity to the Anaerobic Digestion facility to the north of the site.

Vision

- 6.12 The Land North of Penkridge will provide a new northern edge to the settlement and be a sustainable extension and new neighbourhood in the village, delivering high quality, distinctive development integrated within a strong landscape setting, including a new Community Park area, providing a range of formal and informal open space and uses, respecting and enhancing the area's natural assets and key views.
- 6.13 The development will have a strong environmental, economic and social relationship with the existing settlement, complementing the existing village centre and facilities, building on its existing/future education opportunities, and delivering new centrally located space for community, retail and local business/employment, including a new first school and a local convenience store. The new homes and facilities will increase the range of opportunities for existing and future residents, including bungalows/single storey homes.
- 6.14 Land north of Penkridge will be well-connected to the existing settlement and surrounding countryside with excellent public transport, cycling and walking links. The

connections will enhance the development's integration with the existing settlement, encouraging active travel to services and facilities, including the rail station, education and the new Community Park.

- 6.15 High quality, distinctive design, set within a green and blue infrastructure framework, extending throughout and beyond the new development, will provide a new framework of greenways and deliver a strong sense of place identity. The development will focus upon achieving high environmental standards, energy efficiency and achieving a regulated zero carbon community.

Objectives

6.16 Environmental

Transport & Movement

- There will be a clear hierarchy of connected streets and routes which will be safe, active and secure, including a reduction in traffic speed along this part of the A449 as it passes through the village, which will enable suitable crossing points, shorter routes and improved environmental quality.
- There will be enhanced walking/cycling connections within the new development and to established destinations within the existing village centre to the south, including routes to education, community facilities and the railway station. The new routes on site will include greenways.

Housing & Built Environment

- Relevant character areas will be incorporated within the site to reflect the surrounding context, landscape led approach, sensitive edges and the movement framework/hierarchy.
- The northern part of the site could provide a new gateway to the wider settlement along with responding positively to the countryside edge.
- High quality, distinctive and well-designed housing and built form will be provided that embraces sustainable and energy efficiency and creates a balanced community and accommodate a range of people, including first time buyers, young families and the elderly.

Environmentally Sensitive

- There will be integrated SuDS as part of an overall green infrastructure framework and public realm to mitigate risk from the floodplain whilst enhancing the overall quality of place.
- The community park should provide a range of open space uses and activities for all ages, including, for example, community food production and formal/informal areas for play/recreation and in which to linger, informed by early community engagement. It will connect with the wider green infrastructure framework and will positively reflect the linear nature of the site.
- The extensive green infrastructure network will provide movement corridors through and around the development, linking in with opportunities to access the

wider countryside. It will provide a buffer from the railway line and existing ecological features such as trees and hedgerows will be maintained and wildlife habitat enhanced to create multi-functional amenity spaces and biodiversity corridors.

- Street trees will be provided along suitable routes/spaces. In addition, trees and green infrastructure will be required to help mitigate noise and vibration from the railway.

6.17 **Economic**

Well Served and Thriving

- The provision of community infrastructure and education facilities will be centrally located to ensure good access/active travel for all residents, particularly seeking to reduce the perception of segregation (i.e. the A449 as a potential barrier).
- Convenience retail and local community/employment space (flexible) should be provided as part of the neighbourhood centre to reduce the number of trips required by residents. Flexible and adaptable spaces within the centre should be provided to ensure long term resilience so that the development can evolve over time to meet the changing needs of the community.

6.18 **Social**

Active, inclusive & safe

- The inclusion of communal gardens and informal spaces will help to promote a sense of community and social inclusion.
- Active travel will be prioritised to encourage walking/cycling, whilst also reducing the risk of air pollution from traffic within the site.
- A range of suitable homes will be provided to meet established needs in respect of size, type, tenure and affordability.

Well run

- The existing and new residents within the community should be engaged to consider the future stewardship of the place and in particular the design, delivery and future management of the new facilities such as the local centre/community space and green infrastructure network, including the potential for a future Community Trust to be established.

Implementation

Local/national Funding	Development Management	Partners	Section 106/278 agreement	Masterplan framework
	✓	✓	✓	✓

Housing Allocations

6.19 Housing allocations to deliver growth over the plan period in accordance with the council’s Spatial Strategy (Policy DS5) are set out in Policy SA3 below. Details of the methodology for filtering site options and the assessments of allocated sites and reasonable alternatives can be found in the accompanying Housing Site Assessment Topic Paper 2024.

Policy SA3: Housing Allocations

Alongside the strategic development locations identified in Policies SA1 and SA2, the following housing allocations will be delivered to meet the district’s housing target up to 2041. The site boundaries are set out in the relevant site proforma in Appendix C.

Village/ Town	Site Ref No.	Use	Site location	Minimum Capacity (dwellings)	Proforma Page Number
Tier 1 Settlements					
Bilbrook	213	Residential	Bilbrook House	13	169
Codsall	419a&b	Residential	Land at Keepers Lane and Wergs Hall Rd	317	173
Codsall	224	Residential and station parking	Land adjacent to Station Road	85	170
Codsall	228	Residential	Former Adult Training Centre off Histons Hill	29	172
Cheslyn Hay	523	Residential	Land east of Wolverhampton Road	49	178
Cheslyn Hay	119a	Residential	Land adjoining Saredon Road	60	176
Great Wyrley	141	Residential	154a Walsall Road	31	180
Great Wyrley	136	Residential, country park and allotments	Land at Landywood Lane	159	182
Great Wyrley	139	Residential	Pool View, Churchbridge	46	184
Great Wyrley	638	Residential	Loades Plc	29	192

Great Wyrley	704	Residential	Land off Norton Lane	31	186
Great Wyrley	536a	Residential (including specialist housing and school parking)	Land off Holly Lane	84	190
Great Wyrley	730	Residential	Fishers Farm	10	188
Penkridge	005	Residential	Land at Cherrybrook	88	195
Penkridge	006	Residential	Land at Boscomoor Lane	80	197
Tier 2 Settlements					
Brewood	617	Residential	Four Ashes Road	63	200
Huntington	016	Residential	Land at Pear Tree Farm	39	203
Kinver	274	Residential	Land south of White Hill	120	206
Perton	239	Residential	Land west of Wrottesley Park Road (south)	150	209
Wombourne	416	Residential	Land off Orton Lane	57	212
Wombourne	285, 562/415, 459	Residential	Pool House Road	223	214-218
Tier 3 Settlements					
Coven	082	Residential	Land between A449 Stafford Rd & School Lane	48	221
Featherstone	397	Residential	Land adjacent to Brookhouse Lane	35	224
Pattingham	251	Residential	Hall End Farm	17	227
Swindon	313	Residential	Land off Himley Lane	10	230
Wheaton Aston	379	Residential	Land off Ivetsey Road	18	233

Other Sites Adjacent Neighbouring Towns and Cities					
South of Stafford	036c	Residential	Land at Weeping Cross (adjoining Stafford Borough)	81	235

All site allocations will be delivered in accordance with the individual site planning requirements set out in Appendix C and any other mitigation which is deemed necessary, through the development management process. Proposals should be consistent with other Development Management policies in the Local Plan.

Gypsy and Travellers

- 6.36 As detailed in Chapter 5, the strategy for new Gypsy, Traveller and Travelling Showperson provision is to meet the needs of existing families as far as possible, that meet the Planning Policy for Travellers Sites (PPTS) planning definition by continuing to deliver privately owned sites/pitches. The evidence supports an approach therefore of looking to allocate existing temporary or unauthorised sites to permanent (subject to other planning considerations) and looking to intensify and extend existing sites.
- 6.37 The latest GTAA update (2024) identified a need for 142 pitches up to 2042 for those families that meet the planning definition of Gypsies and Travellers. When assuming that 84% of ‘undetermined’ households in the district will also require a pitch then this need increases to 162 pitches to 2042. A need of 18 pitches for those not meeting the planning definition was identified to 2042.
- 6.38 Where suitable options for new pitches exist, the Local Plan proposes to allocate pitches to meet the district’s existing families’ (who meet the planning definition) 5 year need, as informed by the GTAA update. It is acknowledged that there may be additional 5 year need from ‘undermined’ households⁶ (i.e. where interviews were not secured), however the uncertain nature of this need means that it cannot be accurately addressed through specific allocations, and therefore will be addressed through a criteria based policy (Policy HC9).
- 6.39 Equally, future pitch needs beyond the 5 year requirement (including Travelling Showperson needs) will come through the Development Management process with proposals considered against Policy HC9. It is anticipated that this need will be met on or as extensions to existing sites with an emerging need, and these sites, subject to conformity with Policy HC9, are the broad locations anticipated to meet a proportion of future growth and are identified on the policies map. Policy HC9 and any other relevant policies (e.g. DS1: Green Belt) will also be the mechanism through the Development Management process for considering those families/individuals with an identified need but do not meet the planning definition of a Gypsy, Traveller or Travelling Showperson.
- 6.40 Proposed allocations are informed by the council’s Pitch Deliverability Study (PDS) 2021 and site assessment process, which engaged with families with a need on existing sites to explore what options they have to expand, including amendments to site layout. Due to site constraints identified in the study, the current 5 year need (92 pitches) for families that meet the planning definition cannot be met on all existing sites. The PDS identified 42 deliverable pitch options to meet the 5 year need, however following consideration of responses to the Preferred Options consultation it was concluded that the proposed allocation at 122 Streets Lane, Great Wyrley was unsuitable for allocation. This assessment was taken based on reviewing a previous Planning Inspector’s decision relating to this site, and in particular, the impact the

⁶ Approximately 12 pitches (84% of 14 pitches estimated to be required to meet the 5 year need of ‘undetermined households’).

proposal would have on the openness of the Green Belt. This resulted in the identification of 37 suitable pitch options for allocation. Through the 2024 GTAA update, the five year needs of families were reassessed, including the families on sites assessed as suitable for expansion, with the number of pitches proposed reflecting this latest evidence. Overall, it remains the case that 37 suitable pitch options for allocation are identified.

6.41 As a result of the shortfall of pitch provision against the 5 year need further options to identify sites have been explored. Given that the needs are generated from specific family members already living in the district, the focus has been to identify options for a new public site, so it would be possible to ensure pitches were reserved for those family members in need of a pitch. This could not be guaranteed if privately owned sites were allocated where there would not be the same level of control on who the pitches went to. In the process of exploring options for a public site, an assessment of district council owned land was undertaken, but this process demonstrated that no council owned sites were suitable mainly due to significant constraints, such as being in use for open space or sports facilities. In addition, site promoters for allocated housing sites were contacted to enquire whether a proportion of their site could be made available for a publicly run traveller site, however a willing landowner for this use could not be identified. Finally, an assessment of Staffordshire County Council owned land was undertaken. Through this process one land parcel was identified as potentially suitable through the site assessment process. However, it was subsequently confirmed by Staffordshire County Council that they are unwilling to run the site as a public site themselves or gift the land to be run by the district council or other public body, and as such deliverability cannot be demonstrated. Further details of how the needs for gypsies and travellers have been considered can be found in the Gypsies, Travellers and Travelling Showpeople Topic Paper.

6.42 The red line boundaries of the sites for allocation have been informed by an assessment of capacity, considering site licencing requirements and the land needed for access/turning and amenity buildings. Proposed allocations are set out in Policy SA4 below:

Policy SA4: Gypsy and Traveller Allocations

Gypsy and Traveller pitches are allocated at the locations set out in the table below to meet identified family needs.

The new pitch allocations must be located within the red line boundary of the site as shown in Appendix D.

Site	Site ref no.	Total no. pitch allocations	Proforma page number
New Acre Stables, Penkridge	GT01	4	237

The Spinney, Slade Heath	GT06	2	238
The Bungalow, Coven	GT07	3	239
Brinsford Bridge, Coven Heath	GT08	7	240
Brickyard Cottage, Essington	GT14	4	241
The Stables, Upper Landywood	GT17	3	242
Park Lodge, Wombourne	GT18	2	243
Glenside, Slade Heath	GT23	3	244
Kingswood Colliery, Great Wyrley	GT32	9	245

All sites are existing established sites or direct extensions to these and are often in remote rural locations and washed over by the West Midlands Green Belt. As an exception to the planning policies relating to the location of Gypsy and Traveller pitch provision in the Green Belt, pitches identified in the Green Belt through the Local Plan will be acceptable in principle where planning applications are submitted for the specified number of additional pitches allocated in the Local Plan.

Planning applications on these sites will need to be in accordance with the criteria in Policy HC9, any site-specific planning requirements set out in Appendix D, and any other mitigation which is deemed necessary through the development management process.

Proposals should be consistent with other policies in the Local Plan.

Employment

- 6.43 Employment land should be identified to meet the needs of all employment uses; offices, research and development, light/general industrial, and storage/distribution. The level of employment sites and premises required to meet South Staffordshire requirements over the plan period was calculated in the council's Economic Development Needs Assessment (EDNA) update 2024, which identified an objectively assessed need for employment land for South Staffordshire over the period 2023-2041 of 62.4ha.
- 6.44 As confirmed through the EDNA update, the pipeline supply of employment land over the plan period is sufficient to meet South Staffordshire's needs as well as provide surplus available to contribute towards cross boundary unmet needs. The district's main employment areas are set out in Table 9 below which details and the amount of employment land available (in hectares gross) for the period 2023-2041 on a site-specific basis (excluding supply from smaller windfall developments). This includes

proposed allocated sites and sites with planning permission that are not started or under construction at April 2023.

	Site Name	Parish(es)	Site Area (Ha)	Available Land for Employment Development 2023-2041 - site areas(Ha)
Strategic Employment Site	Four Ashes Industrial Estate, Four Ashes (inc. Bericote)	Penkridge. Brewood & Coven	72.0	0.6
	Hilton Cross Business Park	Featherstone	18.0	0.0
	ROF Featherstone.	Featherstone	36.0	36.0
	West Midlands Interchange	Penkridge. Brewood & Coven	297.0	*297
	i54, Wobaston Road	Bilbrook	90.5	4.8
	I54 Western Extension	Bilbrook	40.0	40.0
	M6, Junction 13, Dunston	Dunston	17.6	17.6
Other main Employment areas	Acton Gate	Dunston	13.7	0.0
	Balliol Business Park	Bilbrook	6.6	0.0
	Coppice Lane, Cheslyn Hay	Cheslyn Hay	7.3	0.0
	Dunston Business Village	Dunston	2.1	0.1
	Essington Light Industrial Estate	Essington	0.8	0.0
	Hobnock Road	Essington	5.2	**5.2
	Hawkins Drive Industrial Estate	Cheslyn Hay	12.0	0.0
	Hepworth Site, Warstones Road	Essington	3.8	0.0
	Heathmill Road Industrial Estate	Wombourne	19.3	0.0
	Hilton Main Industrial Estate	Featherstone	7.1	0.0
	Vernon Park	Featherstone	5.7	2.8
	Huntington Industrial Estate	Huntington	1.1	0.0
	Kingswood Business Park	Perton	1.0	0.0
	Landywood Enterprise Park	Great Wyrley	3.4	0.0
	Landywood Lane Industrial Estate	Cheslyn Hay	6.5	0.0
	Littleton Business Park	Huntington	2.7	0.0
	Loades plc., Gorse Lane	Great Wyrley	1.1	0.0
	Owens Trading Estate	Bilbrook	7.1	0.0
	Paradise Lane, Slade Heath	Featherstone	3.1	0.0
	Former Sandvik Site, Brinsford	Featherstone	2.2	0.0
Smestow Bridge Industrial Estate	Wombourne	21.1	0.0	

Wolverhampton Business Airport	Bobbington	1.7	0.0
Wombourne Enterprise Park	Wombourne	3.9	0.8
		TOTAL	399.7
		less WMI	102.7

*18.8ha of site required to meet South Staffordshire’s labour demand plus additional allowance

** This land has benefited from a certificate of lawful use for B2 use for over 10 years , however is in the Green Belt and therefore as a precautionary measure is not included in the supply total.

Table 9: South Staffordshire Employment stock (district’s main employment areas)

6.45 The figure for the available land at WMI reflects the gross site area as consented through the Development Consent Order (DCO) process. Initial applications in accordance with the DCO consent have now started to be determined, and the site will continue to be built out over the majority of the plan period. WMI is therefore allocated for employment development in line with the DCO consent, however, will remain washed over by Green Belt. This will provide certainty that the site will come forward in accordance with the DCO, reducing the risk that alternative forms of development could come forward. The council will continue to work positively with the developers on WMI to ensure the site comes forward in accordance with the DCO and delivers the best scheme possible. It is recognised that WMI meets a wider than local need. Our EDNA 2022 and EDNA Update 2024 has considered this issue and concluded that 18.8ha of the site is needed to meet the district’s labour demand requirements for logistics, including an additional allowance to correspond with expectations for job creation identified via the DCO process.

6.46 The plan also allocates an additional strategic employment site at M6 Junction 13, Dunston. This site has the advantage of being non-Green Belt land and is strategically well located adjacent the motorway junction. Whilst this site is not needed to increase the district’s supply of employment land to meet our own objectively assessed needs for employment land (62.4ha), allocating this site ensures plan flexibility and ensures a very healthy pipeline of sites in the district. This recognises that allocating additional land will increase the pipeline of sites to more closely reflect recent take up (albeit with a sub-regional component ‘built in’ due to recent large-scale completions, predominantly at i54). Furthermore, the site’s location aligns with a potential broad location for strategic employment land in the West Midlands Strategic Employment Sites Study (2021). Whilst it is slightly under the optimum site size for strategic employment envisaged in the WMSESS 2021, it is still of a scale capable of delivering strategic scale employment units, and given its location, is deemed suitable for allocation, and will be subject to further detailed scrutiny through the Development Management process.

6.47 Allocating WMI and M6 Junction 13, Dunston helps strengthen the portfolio of employment land in the district over the plan period, including a mix of land for strategic warehousing (WMI), advanced manufacturing (i54) and general high-quality employment (ROF Featherstone). These are balanced by land for smaller scale employment opportunities in the pipeline and further complemented by smaller scale employment land availability in the wider FEMA. No windfall allowance has been

applied to estimate future supply, but the EDNA update (2024) does illustrate that in terms of past take up and market signals, non-strategic sites represent an important source of demand. The plan's policies outside of allocated pipeline sites seek to support suitable and appropriate schemes such as those that might provide for redevelopment or intensification of existing employment uses or to assist with rural enterprise. Contributions to land and floorspace supported by the application of these policies will help ensure additional choice and flexibility.

- 6.48 In addition to allocating WMI and M6 Junction 13, Dunston, Policy SA5 takes the approach of allocating sites where there was available employment land at 1 April 2023 and where the site did not have a full/reserved matters permission at this base date.

Policy SA5 - Employment Allocations

The following sites will be allocated to ensure that the district's employment land requirements identified in Policy DS4 is met.

Site Reference	Site Name	Area (Ha) of employment site for allocation	Employment Type (Use Class ¹)
E18	ROF Featherstone	36	E(g); B2; B8
E24	I54	2.4	E(g); B2
E30	M6 Junction 13, Dunston	17.6	E(g); B2; B8
E44	I54 western extension (north)	16.7	E(g); B2
E33	West Midlands Interchange (WMI).	297	B8

¹ As defined by the [Town and Country Planning \(Use Classes\) Order 1987 \(as amended\)](#).

The above sites represent those within the district's pipeline supply of sites as at April 2023 without a full or reserved matters planning permission, in addition to West Midlands Interchange.

West Midlands Interchange (E33)

The WMI employment site allocation (E33) is for a Strategic Rail Freight Interchange (SRFI) and will be progressed in-line with the [Development Consent Order](#) (DCO) that granted permission on 4 May 2020. WMI remains washed over by Green Belt.

Development proposals should be consistent with other Local Plan policies.

Part C: Homes and Communities

7. Delivering the right homes

Housing Mix

- 7.1 There is a significant mismatch between the district’s existing housing stock and future housing need. The 2021 Census identified that 70% of homes in the district have 3 bedrooms or more, and almost 80% of the stock is detached or semi-detached. However, the Housing Market Assessment 2022 indicates that household sizes are decreasing, with the emergence of many more single person households, but also those with lone parents and couples with no children. South Staffordshire also has a rapidly ageing population, creating a pressing need to provide homes more suitable to meet the needs of older people. The council’s housing mix policy must address this imbalance in the market. According to the Housing Market Assessment 2024, in the market sector specifically, 80% of overall need up to 2041 is for properties with 1, 2 or 3 bedrooms. There is also a large need for affordable housing to meet a range of needs, for those unable to access a property on the open market. The Assessment and other local data such as the council’s housing register, demonstrate that a variety of property sizes are required, and this varies between tenures as well as localities of the district.
- 7.2 The NPPF confirms that having established an overall housing figure for delivery, the council must then assess the size, type and tenure of housing needed for different groups in the community and reflect this in planning policies. The provision of a variety of homes to suit all needs and ages is also referenced in the National Design Guide as a key aspect of well designed, diverse neighbourhoods.
- 7.3 The council’s housing mix policy offers a good balance between providing enough certainty to ensure the right types of homes are provided and development is viable, whilst also maintaining some flexibility to take site circumstances, local housing need and market changes into consideration. The latest Housing Market Assessment will be the primary piece of evidence used to guide the detail of housing mix on new developments, supported with other data from the council’s housing register, parish need surveys and local Registered Providers.

Policy HC1: Housing Mix

The council will support development that creates mixed, sustainable and inclusive communities, and contributes to the objectives of the adopted Housing and Homelessness Strategy.

All new housing developments should provide a mixture of property sizes, types and tenures in order to meet the needs of different groups in the community. Proposals must contribute to better balancing the district’s housing market, particularly by increasing the supply of 2 and 3 bedroom homes in all areas, especially on the open market.

On major development housing sites (excluding sites exclusively provided for self-build or custom housebuilding), the market housing must include a minimum of 70% of properties with 3 bedrooms or less, with the specific mix breakdown to be determined on a site-by-site basis and reflective of need identified in the council’s latest Housing Market Assessment.

All major development must also contribute to meeting the needs of the district’s ageing population in accordance with Policy HC4.

The provision of affordable housing will be required in accordance with Policy HC3. Affordable housing should provide a range of property sizes, with the specific mix to be determined on a site-by-site basis and reflective of need identified in the council’s latest Housing Market Assessment, the council’s housing waiting list, parish need surveys and information from local Registered Providers.

The housing mix of all major development sites will be secured via appropriate means e.g. condition or Section 106 agreement for outline applications, to provide a clear indication of the council’s expectations at an early stage.

Sites of less than 10 dwellings should provide a mixture of property sizes and reflect the need identified in the council’s latest Housing Market Assessment, where consistent with other local plan policies.

Any development that fails to make efficient use of land by providing a disproportionate amount of large, 4+ bedroom homes compared with local housing need will be refused, in accordance with the requirements of this policy and Policy HC2.

Development proposals should be consistent with other Local Plan policies.

Key Evidence

- Housing Market Assessment
- Housing and Homelessness Strategy
- Parish Need Surveys
- Housing Register
- Affordable Housing and Housing Mix Topic Paper

Implementation

Local/national Funding	Development Management	Partners	Section 106 agreement	Supplementary Planning Document
	✓		✓	✓

Housing Density

- 7.4 National planning policy is clear that Local Plans should contain policies that optimise the use of land and should set out minimum density standards for locations well served by public transport. This is particularly key for a district like South Staffordshire which is 80% Green Belt. A joint study across the housing market area (the GBBCHMA Strategic Growth Study 2018) also recommended that all authorities achieved a minimum density of 35 dwellings per hectare on their land supply, to maximise housing supply and minimise the amount of land necessary to meet housing needs.
- 7.5 In response to this, Policy HC2 aims to ensure that the greater housing delivery can be achieved in more sustainable locations, a minimum density standard is proposed in the district's larger settlements and infill locations. Elsewhere, the council will require housing developments to make an efficient use of land, whilst recognising that some flexibility in densities may be required to reflect matters such as the character and infrastructure capacity within the surrounding area. This allows the council to address its housing needs and strike a balance between reducing the need to release more land and reflect the district's rural character and infrastructure capacity issues.

Policy HC2: Housing Density

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

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

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

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

Development proposals should be consistent with other Local Plan policies.

Key Evidence

- Housing Density Topic Paper

Implementation

Local/national Funding	Development Management	Partners	Section 106 agreement	Supplementary Planning Document
	✓			✓

Affordable Housing

- 7.6 Increasing the provision of affordable housing is a key priority of the council, as expressed in the adopted Housing and Homelessness Strategy. South Staffordshire’s housing market is characterised by rising house prices, with the average lower quartile priced house costing over 9.8 times the average lower quartile income (Hometrack, 2024). This leaves home ownership out of reach for many residents, and with private rental prices also increasing, this means there is a substantial need for affordable homes throughout the district which must be addressed through the council’s affordable housing policy.
- 7.7 Taking into account both South Staffordshire’s need and the contribution to meeting unmet needs in the wider Housing Market Area, the Housing Market Assessment 2024 recommends approximately 29% of new housing delivered up to 2041 should be provided as affordable housing. Just over half of this need is for rented homes, with the remainder split almost equally between First Homes and shared ownership.
- 7.8 The NPPF requires the council to assess the need for affordable housing and reflect this in planning policies, including the type of properties required. Affordable housing can only be required on major developments, and must be provided onsite unless an offsite/financial contribution can be robustly justified and contributes to the creation of mixed and balanced communities. From a design perspective, different tenures must be well integrated and designed to the same high quality, creating tenure neutral homes and spaces (National Design Guide).
- 7.9 The affordable housing requirements in this policy have been tested through the Local Plan Viability Study, and have been demonstrated to be viable. Schemes that comply with this policy are therefore assumed to be viable in line with the PPG. An Affordable Housing SPD will be adopted to provide further detail on the council’s requirements for First Homes, integration of affordable housing, implementation of Vacant Building Credit, the calculation of financial contributions and any other matters requiring additional information.

Policy HC3: Affordable Housing

All proposals for major housing development will be required to provide 30% affordable housing. This includes any development which provides self-contained units for day-to-day private domestic use, regardless of use class and whether care is provided to residents.

The affordable housing should then be broken down by tenure as follows:

- 25% First Homes
- 50% Social Rent
- 25% Shared Ownership

The council will consider what local eligibility criteria should be implemented for the delivery of First Homes and detail these in the Affordable Housing SPD. The mix of property sizes and types of affordable housing will be determined in accordance with Policies HC1 and HC4.

The council will apply a Vacant Building Credit and reduce the affordable housing requirement as required, in accordance with national policy and the Affordable Housing SPD.

Applications may be refused where a single site has been subdivided into smaller parcels in order to circumvent the affordable housing threshold. Where permission has been granted for a scheme and a subsequent application is made which clearly forms part of a single development, then the full affordable housing requirement will be required for the total number of dwellings proposed across all relevant applications.

The council requires new development to contribute towards mixed and sustainable communities, therefore affordable housing should be provided on site and fully integrated with market housing. This should be achieved by suitably pepper potting the affordable housing across the site, ensuring it is materially indistinguishable from market housing in both siting and design and otherwise provided in accordance with the Affordable Housing SPD.

Affordable housing will be secured in perpetuity and monitored via an appropriate legal means e.g. Section 106 agreement, subject to Right to Buy/Acquire, staircasing and mortgagee in possession provisions. Delivery must be phased with the market housing on site in accordance with triggers specified in the Section 106 agreement.

Shared ownership housing will be subject to staircasing restrictions in Designated Protected Areas in accordance with the relevant legislation, in order to safeguard new provision.

Offsite and/or financial contributions in lieu of onsite provision of affordable housing will only be acceptable in exceptional circumstances. In such cases, the applicant will

be required to provide clear justification for not providing affordable homes on site, and demonstrate how an offsite contribution will contribute to mixed and sustainable communities.

Planning applications that comply with up-to-date policies in this plan will be assumed to be viable. Consideration will not be given to reducing the affordable housing contribution on the grounds of viability unless the applicant can first demonstrate to the satisfaction of the council that particular circumstances justify a viability assessment at application stage, as per the PPG.

Further guidance on the requirements of implementing this policy will be provided in the adopted Affordable Housing SPD.

Development proposals should be consistent with other Local Plan policies.

Key Evidence

- Housing Market Assessment
- Housing and Homelessness Strategy
- Local Plan Viability Study
- Affordable Housing and Housing Mix Topic Paper

Implementation

Local/national Funding	Development Management	Partners	Section 106 agreement	Supplementary Planning Document
	✓	✓	✓	✓

Homes for older people and others with special housing requirements

- 7.10 The district has an increasingly ageing population, which is set to continue through the plan period. The Housing Market Assessment 2024 indicates approximately one third (36.5%) of the population will be aged 60 or over in 2041. This equates to a 16% increase on 2023 figures. The Housing Market Assessment 2022 confirmed that in the years up to 2040, the number of people with health issues and disabilities is also expected to increase. An 8% increase in people aged 18-64 with impaired mobility is projected, as well as a 47% increase in people aged 65+ that are unable to manage at least one mobility activity on their own. The Assessment also confirms that 7.2% of the district's total housing stock should meet Building Regulations Part M4(2) by 2040. This amounts to 3,978 accessible and adaptable homes. The council is therefore seeking to provide a range of housing options for older and disabled people, in order to maintain the safety and independence of residents, allow them to stay in their own size appropriate home for longer and reduce pressure on health and social care

services. This will include both specialist and general housing types, as well as higher technical standards for accessibility.

- 7.11 The NPPF requires the council to assess and plan to meet the housing needs of older people and people with disabilities. The PPG goes on to confirm how the diverse range of needs of these groups must be considered. Authorities should make provision for specialist housing where a need exists (ranging from age restricted to extra care and care homes), alongside general housing options such as bungalows which are already suitable, and easily adaptable, futureproofed properties.
- 7.12 Policy HC4 provides flexibility for developments to provide a range of types of home for older and disabled people dependent on-site circumstances. In terms of general (i.e. non-specialist) housing for these groups, the council's preference and expectation will be for contributions to be made in the form of bungalows in the first instance. This reflects the council's targets within the adopted Housing and Homelessness Strategy, their intrinsic suitability for older and disabled people, and the high demand for this form of property in South Staffordshire. The suitability of other single storey accommodation such as flats and maisonettes will be carefully considered by the council on a case-by-case basis. The requirements for higher access standards have been tested and shown to be viable through the Local Plan Viability Study.

Policy HC4: Homes for older people and others with special housing requirements

The council will continue to work with Registered Providers, developers and other stakeholders to secure homes which meet the needs of older people and other groups with specialist requirements.

All major housing developments will be required to demonstrate how the proposal clearly contributes to meeting the needs of older and disabled people. The council will expect housing, as part of the wider mix on the site, to be provided in the following forms, in order to provide a range of general and specialist housing options and meet the objectives of the adopted Housing and Homelessness Strategy:

- Bungalows
- Other age restricted single storey accommodation such as flats and maisonettes
- Sheltered/retirement living
- Extra care/housing with care and other supported living

Homes suitable for older and disabled people should be provided within both the market and affordable sectors, with the specific mix further guided by the council's latest Housing Market Assessment, local housing need surveys and the Housing Register.

All major developments will also be required to ensure 100% of both the market and affordable housing meets the higher access standards Part M4(2) Category 2: Accessible and adaptable dwellings of Building Regulations. Additional weight will be given to the provision of properties also accessible for wheelchair users.

Development proposals should be consistent with other Local Plan policies.

Key Evidence

- Housing Market Assessment
- Housing and Homelessness Strategy
- Housing Need Surveys
- Local Plan Viability Study
- Homes for Older and Disabled People Topic Paper

Implementation

Local/national Funding	Development Management	Partners	Section 106 agreement	Supplementary Planning Document
	✓	✓	✓	

Specialist Housing

- 7.13 The district has a rapidly ageing population and several other groups of the community in need of specialist accommodation to provide them with a comfortable and affordable home. The Housing Market Assessment 2024 indicates a need for 1,198 additional specialist homes up to 2041, including 1,000 sheltered homes, and 198 extra care units. A further 153 additional registered care spaces may also be required. In order to meet this need, the council will encourage provision of specialist housing and registered care schemes in sustainable locations to provide suitable homes for those that can no longer remain in their own property. It is important that schemes allow residents to feel a part of their community still, located close to services and their existing family, friends and support networks. Protecting existing provision will also be vital to safeguard against any increased shortfall of specialist housing.
- 7.14 The PPG sets out a range of types of specialist housing for councils to consider and confirms that authorities should ensure provision of specialist housing where a need exists. It is up to the council to decide on the most appropriate approach for this, including whether allocating sites for specialist housing is required. Considerations should include access to public transport, health services and other amenities. A positive approach to decision making should be taken where a specialist need has been identified.
- 7.15 The provision of specialist housing will be strongly supported in line with Policy HC5. Alongside this, a number of site allocations including a requirement for specialist housing provision have been made as set out in Policies SA1-SA3, to provide certainty of provision over the plan period.

Policy HC5: Specialist Housing

The council will enable and strongly support proposals for the provision of specialist housing of all tenures, particularly those that will contribute to meeting the needs of the district's ageing population, subject to the proposed development meeting all of the following criteria:

- a) Suitable in size and scale in relation to the existing settlement
- b) Well integrated with the settlement (in terms of siting and design) in order to promote and encourage interaction with existing communities
- c) Situated in a sustainable location within safe walking distance of key services, facilities and public transport links
- d) Suitable provision is made of attractive landscaping and high quality outdoor recreational spaces
- e) Suitable and safe parking provision for residents, staff, visitors and emergency services

Specialist housing may be in the form of age-restricted accommodation, retirement, sheltered, extra-care, housing with care, nursing/residential homes or other forms of supported living.

The loss of specialist accommodation will not be supported unless required to increase the overall quantity of specialist homes in the local area, or improve quality where existing provision is no longer fit for purpose (e.g. through redevelopment or relocation).

The council will work with Staffordshire County Council and registered providers in order to identify specific opportunities and sites for specialist housing.

Development proposals should be consistent with other Local Plan policies.

Key Evidence

- Housing Market Assessment
- Housing and Homelessness Strategy
- Homes for Older and Disabled People Topic Paper

Implementation

Local/national Funding	Development Management	Partners	Section 106 agreement	Supplementary Planning Document
✓	✓	✓	✓	

Rural Exception Sites

- 7.16 Housing affordability is a significant issue across the district and in many places is forcing young people away from the villages they grew up in because they are unable to find a home they can afford in their local area. Site allocations in this plan will deliver much needed affordable housing for South Staffordshire, but rural exception sites provide an opportunity to secure new affordable homes for local people and add to stock in areas not receiving significant allocations. They also play a crucial role in helping to maintain the vitality of villages and sustain existing local services and facilities such as pubs, schools and shops.
- 7.17 The PPG confirms that councils should work proactively with landowners, parish councils, housing associations, community land trusts and other relevant bodies to bring forward exception sites. Sites should address the housing need of local communities and any form of affordable housing is permitted, provided there is specific evidence to support the proposed tenures. Market housing can be provided where essential for viability purposes and authorities are encouraged to set policies that specify a specific proportion in further detail.
- 7.18 A number of rural exception sites have been successfully developed in the past in South Staffordshire, none of which have required the provision of market housing in order to secure viability of the site. The council is therefore limiting the provision of market housing to rural exception sites developed on land outside the Green Belt, and up to a maximum of 10% of dwellings. Evidence must also be provided to demonstrate the market housing is necessary for viability purposes. Further detail is also provided in the policy on requirements for the process to ensure local communities are engaged and evidence is sufficiently robust to justify local need.

Policy HC6: Rural Exception Sites

As an exception to planning policies relating to the location of housing development in the district, small rural exception sites of 100% affordable housing to meet the identified needs of local people will be supported where all of the following criteria are met:

- a) The site lies immediately adjacent to the development boundary of the settlement
- b) An affordable housing need has been identified in the parish through a robust housing need survey, which considers all tenures of affordable housing identified

in the NPPF definition, for the type, tenure and scale of development proposed. In parishes with more than one settlement, the survey should include data or be supplemented with additional information to demonstrate the housing need specifically in the settlement in which the development is proposed.

- c) The proposed development is proportionate in size and scale in relation to the existing settlement, having regard to its role in the settlement hierarchy
- d) The initial and subsequent occupancy is controlled through planning conditions and/or legal agreements to ensure the accommodation remains affordable and for local people in housing need in perpetuity.
- e) The proposed development respects the scale, character and local distinctiveness of its surroundings.

The council will work proactively with Registered Providers and community organisations to identify opportunities for rural exception sites to deliver affordable housing over and above the housing supply set out in this plan. The council will require Parish Councils to be engaged in the process and a Rural Housing Enabler commissioned to consult with local communities and provide an independent assessment of local need. Any housing need survey and supporting information submitted to evidence local housing need should be no more than 3 years old, at the point of application submission, to be considered an up-to-date, robust assessment.

In exceptional circumstances in areas outside the Green Belt, a maximum of 10% market housing may be permitted at the council’s discretion, where it can be robustly demonstrated to be essential to the viability of the scheme. In such cases, the market housing must be fully integrated with, and of a consistent standard and design as, the affordable homes in accordance with the adopted Affordable Housing SPD.

Development proposals should be consistent with other Local Plan policies.

Key Evidence

- Housing Need Surveys
- Housing Register
- Housing and Homelessness Strategy

Implementation

Local/national Funding	Development Management	Partners	Section 106 agreement	Supplementary Planning Document
✓	✓	✓	✓	✓

First Homes Exception Sites

- 7.19 First Homes were introduced as a new form of affordable housing in 2021, designed to assist first time buyers in taking their first step onto the housing ladder, by allowing properties to be purchased at a minimum 30% discount. South Staffordshire’s Housing Market Assessment 2022 identifies a need for a range of affordable housing tenures, which does include a small requirement for First Homes. The council must ensure that any First Homes exception sites that do come forward integrate well with the existing settlement and provide an appropriate mix of tenures alongside First Homes to reflect affordable need in the district.
- 7.20 The detailed definition, eligibility and other criteria related to First Homes is set out in the PPG. Increased discount levels are permitted where evidence suggests this is required. Other local eligibility criteria can also be implemented, and the council will consider this further and detail this in the Affordable Housing SPD. First Homes exception sites primarily deliver First Homes alongside other forms of affordable housing and market housing where evidence justifies it. Sites should be proportionate in size to the existing settlement and councils are encouraged to set policies which specify their approach to determining this.

Policy HC7: First Homes Exception Sites

As an exception to planning policies relating to the location of housing development in the district, small exception sites of primarily First Homes to meet the needs of local people will be supported where all of the following criteria are met:

- a) An evidenced need for First Homes exists within the district which is not already being met within the local authority area
- b) The site lies outside the Green Belt and is immediately adjacent to the development boundary of the settlement
- c) The proposed development is of a proportionate size and scale in relation to the existing village, taking into account the size of the settlement having regard to its role in the settlement hierarchy
- d) No more than 10% of the site is provided as market housing and the applicant has sufficiently demonstrated this is required for the viability of the development where grant funding is unavailable and/or there are abnormal site costs
- e) The need for other affordable tenures has been considered and limited provision has been made on the site accordingly to reflect the significant need in the district
- f) The initial and subsequent occupancy of properties is controlled through planning conditions and/or legal agreements to ensure the accommodation remains affordable and for local people in housing need in perpetuity

g) The proposed development respects the scale, character and local distinctiveness of its surroundings, and complies with any other local design policies and guidance

The council will consider what local eligibility criteria should be implemented for the delivery of First Homes and detail these in the Affordable Housing SPD.

In cases where a mixture of tenures is provided, all properties must be fully integrated and of a consistent standard and design, in accordance with the adopted Affordable Housing SPD.

Development proposals should be consistent with other Local Plan policies.

Key Evidence

- Housing Market Assessment
- Housing and Homelessness Strategy

Implementation

Local/national Funding	Development Management	Partners	Section 106 agreement	Supplementary Planning Document
✓	✓		✓	✓

Self-build and Custom Housebuilding

7.20 Data held by the council suggests a modest need for self-build and custom housebuilding plots in the district. As of February 2024, there were 36 entries on the council’s Self-build and Custom Housebuilding Register. Whilst the need is currently relatively low, the council is taking a positive approach to this form of housing in order to provide a range of housing options for residents and ensure sufficient plots are provided. The authority is seeking to respond positively to dedicated schemes, as well as working with housebuilders of major developments to reflect the need on the register within the mix of the scheme.

7.21 The NPPF confirms that authorities must assess the need for people that wish to commission or build their own home, and reflect this accordingly in policy. The PPG sets out further guidance on the council’s legal requirements to keep a register of those looking to build or commission their own home and have regard to this register in plan-making. Authorities are permitted to apply a local connection test to entry to the register, and in these cases, the register will be split into Parts 1 and 2 to reflect this. The council are then bound by a duty to grant enough planning permissions to meet the need on Part 1 of the register only.

7.22 The council has implemented a local connection test since 2017, meaning therefore that the register is split into two parts. The level of need will be kept under review to ensure sufficient plots continue to be provided over the plan period. Plots identified as self or custom build at planning application stage may be secured via an appropriate means, such as through planning condition or Section 106 agreement.

Policy HC8: Self-build and Custom Housebuilding

The council will support the provision of self-build and custom housebuilding schemes and plots throughout the district, where in conformity with other Local Plan policies, in order to ensure a wide range of housing options are available to residents and to meet bespoke needs. The council will work positively with developers, Registered Providers, self and custom build associations and other community groups to bring forward schemes in order to meet demand as evidenced on the self-build register.

Major developments will be required to have regard to the need on the council’s self-build register, and make provision of self and custom build plots to reflect this. The council may require a design code to be agreed with the applicant and implemented for development of the plots.

Developers will be required to actively market plots at a reasonable price for a minimum of 12 months from the date the relevant planning permission is issued. If after this period, the plot has not been sold, the developer will be permitted to build out the plot as a standard property type, for the same tenure as was first approved. Requirements for marketing and notifying the council will be secured through a Section 106 agreement.

Development proposals should be consistent with other Local Plan policies.

Key Evidence

- Self-build and Custom Housebuilding register
- Housing Market Assessment

Implementation

Local/national Funding	Development Management	Partners	Section 106 agreement	Supplementary Planning Document
✓	✓		✓	✓

Gypsies, Travellers and Travelling Showpeople

- 7.23 The Government’s Planning Policy for Traveller Sites (PPTS) - August 2015 details that Local Plans should set criteria-based policies for guiding allocations that have been proposed to meet an identified need; as well as well as for decisions on planning applications that are proposed on unallocated sites (e.g. windfall developments). The definition of Gypsies, Travellers and Travelling Showpeople is set out in the 2012 PPTS.
- 7.24 The council is unable to meet its full 5-year requirement (92 pitches) for gypsy and traveller pitches due to a lack of suitable site options to meet evidenced locally generated needs, with an assessment of site options through the Pitch Deliverability Study 2021 identifying 42 suitable pitch options towards this 5 year requirement. However, based on representations to our Preferred Options consultation in 2021, the decision was taken to delete Land at 122 Streets Lane (GT35) when taking account of a planning inspector’s conclusions on the unsuitability of the site at a previous Section 78 Appeal. Through the 2024 GTAA update, the five year needs of families were reassessed, including the families on sites assessed as suitable for expansion, with the number of pitches proposed reflecting this latest evidence. As a result, the Local Plan has suitable sites to allocate 37 pitches towards the 5 year identified needs of families, with further provision likely to come through windfall developments that will be considered against this policy. The council will respond positively to windfall proposals that accord with Policy HC9, including intensification or expansion of existing sites where there is a proven existing family need.
- 7.25 The PPTS confirms that criteria-based policies should be fair and should facilitate traditional and nomadic life of travellers while respecting the interests of the settled community. This policy is therefore needed to ensure that the new sites/pitches are located in the right areas, are well designed, function effectively, and meet the needs of our Gypsy, Traveller and Travelling Showpeople communities’, whilst also protecting the amenity of neighbouring residential areas.

Policy HC9: Gypsies Travellers and Travelling Showpeople

Applications for Gypsy, Traveller and Travelling Showpeople pitches or plots will only be supported where all of the following criteria are met:

- a) Essential services such as power, water, drainage, sewage disposal and refuse/waste disposal are provided on site.
- b) The site is well designed and landscaped with clearly demarcated site and pitch boundaries using appropriate boundary treatment and landscaping sympathetic to, and in keeping with, the surrounding area. Where tree and hedgerow boundaries border the site these should be retained and where possible strengthened.
- c) A minimum 10% biodiversity net gain is demonstrated in accordance with Policy NB2.

- d) The amenity of the site's occupiers and neighbouring residential properties is protected in accordance with Policy HC11. Sites must be designed to ensure privacy between pitches and between the site and adjacent users, including residential canal side moorings. Proposals for caravans in residential gardens will be refused where they have an adverse impact on the amenity of neighbouring properties.
- e) The site can be safely and adequately accessed by vehicles towing caravans, is well related to the highway network, and provides adequate space within the site to accommodate vehicle parking and turning space to accommodate the occupants of the site.
- f) The proposal, either in itself or cumulatively having regard to existing neighbouring sites, is of an appropriate scale so as to not put unacceptable strain on infrastructure or dominate the nearest settled communities, to avoid problems of community safety arising from poor social cohesion with existing families.
- g) Pitches are of an appropriate scale for the size and number of caravans to be accommodated, without over-crowding or unnecessary sprawl. Site intensification or extensions resulting in additional pitches may be considered acceptable in principle, subject to it being for a proven existing local family need, and acceptable in terms of other planning policies and licencing requirements. A single pitch to accommodate immediate family should only consist of one static caravan and one tourer caravan unless it can be demonstrated that additional caravans are necessary on the pitch to avoid overcrowding.
- h) Built development in the countryside outside the development boundaries is kept to the minimum required, in order to minimise the visual impact on the surrounding area. Where proposals are in the Green Belt, proposals will only be acceptable where they conform to Policy DS1. The proposed allocations of new pitches in the Green Belt set out in Policy SA4 will be acceptable in principle, subject to conformity with Policy SA4 and all criteria in this policy.
- i) Any amenity buildings proposed are of an appropriate scale and reasonably related to the size of the pitch or pitches they serve.
- j) Proposals are not located in areas at high risk of flooding.
- k) Where the proposal is for travelling showperson provision, the site is large enough for the storage, maintenance and testing of items of mobile equipment, and does not have an unacceptable impact on the amenity of neighbouring residential properties, including canal side residential moorings.
- l) Where the proposal is for a transit site, proposals avoid locations that are accessed via narrow country lanes and are in locations with good access to the strategic highway network.

Applications for pitches from individuals that do not meet the planning definition set out in Annex 1 of Planning Policy for Traveller Sites will also be considered in line with this criteria-based policy and other relevant policies on a case-by-case basis.

Development proposals should be consistent with other Local Plan policies.

Key Evidence

- Gypsy and Traveller Accommodation Assessment - update (2024)
- Gypsy and Traveller Accommodation Assessment (2021)
- Pitch Deliverability Study (2021)
- Gypsies, Travellers and Travelling Showpeople Topic Paper

Implementation

Local/national Funding	Development Management	Partners	Section 106 agreement	Supplementary Planning Document
	✓			

8. Design and space standards

Design Requirements

- 8.1 The council is committed to ensuring high standards of planning, design and layout in the district, recognising that where people live has a major effect on their life. If the places where people live are well-planned, appropriately designed and effectively managed, their environmental quality of life is more likely to be of a good standard.
- 8.2 Chapter 12 of the NPPF ‘achieving well-designed places’ states that creating ‘high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve’. Reports from the Building Better, Building Beautiful Commission such as ‘living with beauty’ report published January 2020 advocates all development should be beautiful and well designed.
- 8.3 Policy HC10 sets out a number of requirements to ensure development proposals are well designed and will function as attractive places which have a positive impact on peoples’ well-being.

Policy HC10: Design Requirements

The council will require the design of all developments to be of a high quality.

All development proposals must achieve creative and sustainable design from the outset and throughout the lifetime of the development, which takes into account local character and distinctiveness and ensures all of the following:

- a) Reflects any relevant requirements in the latest South Staffordshire Design Guide SPD, relevant national and local design codes and Conservation Area Management Plans relevant to the site.
- b) Reflects the positive features that make up the character of the local area, enhancing and complementing the site’s surroundings.
- c) Incorporates tree lined streets, particularly along primary highway routes through the site.
- d) Positively responds to and respects the existing landform, layout, building orientation, massing and landscaping.
- e) Ensures attractive and distinctive development with use of a variety of materials that will remain attractive through the lifetime of the development, and uses bespoke house types to avoid a monotonous visual appearance.
- f) Well-designed buildings to reflect local vernacular, including historical building typologies where appropriate.

- g) Ensures land is used efficiently whilst respecting existing landscape and settlement character
- h) Provides a clear and permeable hierarchy of streets, routes and spaces which incorporate a variety of green infrastructure through the development.
- i) Ensures buildings can be entered, used and exited safely, easily and with dignity by all; are convenient and welcoming with no disabling barriers.
- j) Gives safe and convenient ease of movement to all users prioritising pedestrians and cycle users.
- k) Provides access to local services and facilities via sustainable modes of transport.
- l) Provides a range of house sizes, types and tenures in accordance with Policy HC1.
- m) Delivers socially inclusive, tenure-neutral housing for market and affordable properties where no tenure is disadvantaged, including the surrounding landscaping and public realm, in accordance with Policy HC3 and the Affordable Housing SPD.
- n) Ensures all public and private spaces are easily identifiable.
- o) Ensures that streets and other public spaces are well overlooked, whilst seeking to deliver wider Secure by Design principles, where practicable and consistent with other design objectives.
- p) Accommodates car and cycle parking, and bin storage using imaginative solutions that do not detract from the streetscene.
- q) Delivers a high quality and well-managed public realm that supports biodiversity, recreation, heritage and active travel.
- r) Is proactive and adaptive in responding to social and technological conditions particularly in relation to climate change.
- s) Minimises adverse impact on natural resources and maximises the restoration and enhancement of biodiversity.

Where infilling is proposed, it will only be permitted where it does not result in the unacceptable intensification of the area and is sensitively integrated into its immediate setting, townscape and landscape and wider settlement pattern.

Developments proposed to come forward alongside other adjacent or closely related sites with similar delivery timescales must prepare a framework plan to show how a

comprehensive and integrated layout could be achieved alongside other sites in the area.

Development proposals should be consistent with other Local Plan policies.

Key Evidence

- National Model Design Guide
- South Staffordshire Design Guide SPD.

Implementation

Local/national Funding	Development Management	Partners	Section 106 agreement	Supplementary Planning Document
	✓			✓

Protecting Amenity

- 8.4 Policy HC11 sets out the general principles relating to local amenity particularly in respect of important issues such as privacy, noise and disturbance and pollution including the amenity of residents living adjacent to buildings in agricultural use. The policy also considers reasonable levels of private amenity space and seeks to safeguard the amenity of neighbours and the natural environment. This policy is important for ensuring that new development does not have an adverse impact on the wellbeing of residents because of amenity issues.

Policy HC11: Protecting Amenity

All development proposals should take into account the amenity of any nearby residents, particularly with regard to privacy, security, noise and disturbance, pollution (including light pollution), odours and daylight.

Noise sensitive developments such as housing development will not be permitted in the vicinity of established noise generating uses where potential for harmful noise levels is known to exist unless measures to suppress noise sources can be provided through condition or legal agreement.

Development likely to generate harmful noise levels will be directed to appropriate locations away from known noise sensitive locations and noise sensitive habitats unless measures to suppress noise can be provided for the life of the development through legal agreement.

Sensitive developments such as housing will not be permitted in the vicinity of established sources of pollution which may give rise to harm to the amenity of

occupants. Proposals involving the re-use of agricultural buildings to residential use should not take place where agricultural use involving the keeping of animals or associated waste is to be retained in nearby buildings.

Development likely to harm amenity will be directed to appropriate locations away from known sensitive locations or the natural environment.

Development must not unacceptably reduce the existing level of amenity space about buildings, particularly dwellings, and not unacceptably affect the amenity of residents or occupants.

Development proposals should be consistent with other Local Plan policies.

Implementation

Local/national Funding	Development Management	Partners	Section 106 agreement	Supplementary Planning Document
	✓	✓	✓	

Space about dwellings and internal space

- 8.5 The council is committed to ensuring that homes are well designed and offer suitable living conditions to future occupiers. With increases in the amount of home working this is more important to achieve than ever before.
- 8.6 Chapter 12 ‘achieving well-designed and beautiful places’ of the NPPF sets out how *‘The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve’*.
- 8.7 The creation of the Building Better, Building Beautiful Commission and well as the publication of the National Model Design Code also highlights the government’s commitment and focus on creating well designed places.
- 8.8 The density of a new development will depend on several factors, including the location of the site, access points, local road network and characteristics of the surrounding area. The council recognises that each site has its own individual character and that any standards should not be so inflexible that they inhibit the creation of interesting and attractive housing layouts and design, having regard to the need to optimise overall development densities.
- 8.9 In 2015 the government introduced technical housing standards which are a nationally described internal space standard. All new development should be in accordance with these standards.

Policy HC12: Space about dwellings and internal space

The design of new housing should improve the overall quality of development in South Staffordshire, to create a place that people find attractive to live and work in. New development should be designed to take account of individual buildings, their inter-relationships and the character of its surroundings.

Consideration should be given to the layout and design of new housing development, so that a satisfactory standard of spacing around dwellings is achieved, considering outlook, privacy, safety, crime prevention and energy conservation.

Through appropriate design and layout, development proposals must ensure all of the following:

- a) Maximised daylight and sunlight to internal accommodation and private amenity areas. As far as is practicable, habitable room windows, especially lounge windows, should not face north.
- b) Reasonable privacy for dwellings within the layout and protection of the privacy of existing dwellings.
- c) A satisfactory outlook, both within the new development and in relation to the existing development.
- d) A reasonable area of outdoor private amenity space to allow such uses as drying, washing, gardening and children's play space and with space for garden storage. A reasonable area of communal open space must be provided for flats and specialist housing.

Internal Space and layout

All new residential developments must meet or exceed the government's Technical Housing Standards – Nationally Described Space Standard (2015) or subsequent editions.

External Space

All private amenity space should be a minimum of 10 metres in length and the total area of the garden should be a minimum of:

- 45 square metres for dwellings with 2 or less bedrooms;
- 65 square metres for dwellings with 3 and 4 bedrooms;
- 100 square metres for dwellings with 5 or more bedrooms;
- 10 square metres per unit for flats/apartments provided in shared amenity areas.

Flexibility may be applied in relation to the above standard, depending upon the site orientation and the individual merits of the development proposal.

Distances between Dwellings

Dwellings should be designed and sited so as to ensure that all of the following are met:

- a) There is a minimum distance of 21 metres between facing principal windows.*
- b) There is a minimum distance of 14 metres from a principal window when it faces the wall of another dwelling with no principal window.
- c) There is a minimum distance of 10.5 metres from a principal window when the facing wall forms part of a single storey structure.

Flexibility may be applied in relation to the above garden length standard, depending upon the site orientation and the individual merits of the development proposal.

Development proposals should be consistent with other Local Plan policies.

* Principal windows are considered the main or largest glazed area of a room.

Key Evidence

- Housing and Homelessness Strategy
- Internal Space Standards Topic Paper

Implementation

Local/national Funding	Development Management	Partners	Section 106 agreement	Supplementary Planning Document
	✓			

Parking Provision

8.10 It is important that the plan responds positively to shape the way parking is accommodated in new development. The NPPF seeks to encourage a reduction in car usage by promoting sustainable transport choices but also seeks to remove maximum parking standards and encourage local authorities and local communities to set parking standards at a level which best reflect the needs and requirements of their area. The form and amount of parking provided is also crucial to achieving high quality design within a scheme and can affect the amount of construction materials required in building a scheme, whilst provision of electric vehicle charging points can help to play a part in decarbonising the district’s transport infrastructure.

8.11 The aim of Policy HC13 is to ensure that parking provision is carefully considered within new developments, ensuring that the right level of provision is achieved on a scheme-by-scheme basis. This policy approach in the detailed standards which sit behind it, aim to balance to the need to avoid under-provision of parking and creating

a cluttered unattractive streetscene, alongside the increased embodied carbon footprint, inefficient use of land and lack of space for landscaping that could result from over-provision of parking spaces.

Policy HC13: Parking Provision

The council will require appropriate provision to be made for parking in development proposals in accordance with adopted parking standards. The council's recommended parking standards are set out in Appendix I. These should be considered the starting point for the level of cycle and car parking required to support a scheme, but in considering the final level of provision the council will have regard to all of the following:

- a) The anticipated demand for parking arising from the use proposed, or other uses to which the development may be put without needing planning permission.
- b) The scope for encouraging alternative means of travel to the development that would reduce the need for on-site car parking. This will be particularly relevant in areas well-served by public transport.
- c) The impact on highway safety from potential on-street car parking and the scope for measures to overcome any problems.
- d) The need to make adequate and convenient parking provision for disabled people.
- e) Requirements for electric vehicle charging facilities as set out in Appendix I, including infrastructure to support electric public transport where appropriate.
- f) The design quality of the scheme and the embodied emissions associated with the scheme's materials and construction.

Any required cycle storage must be safe, weatherproof, convenient and secure to assist in promoting cycle use. In addition to the electric vehicle charging standards, the provision of other emerging vehicular charging technologies (e.g. hydrogen) will also be supported where it can be demonstrated these will support the transition to zero carbon travel.

Development proposals should be consistent with other Local Plan policies.

Key Evidence

- 2021 Census: Car or van availability, local authorities in England and Wales
- Infrastructure Delivery Plan

Implementation

Local/national Funding	Development Management	Partners	Section 106 agreement	Supplementary Planning Document
	✓	✓		

9. Promoting successful and sustainable communities

Health Infrastructure

- 9.1 Primary health provision such as GP Services and health centres are a vital community services that need protecting and where possible, enhancing. Infrastructure requirements can span across partner services including community, voluntary and secondary care. Increased patient numbers resulting from new development can have an adverse effect on service delivery and therefore it is important that new development mitigates its impact on local health infrastructure. Policy HC14 is therefore needed to ensure that proportionate financial contributions are sought where it is demonstrated that new development will lead to strain on existing facilities.

Policy HC14: Health Infrastructure

Proposals for major residential developments or specialist elderly accommodation must be assessed against the capacity of existing healthcare facilities through engagement with the relevant Integrated Care Board ICB (formally Clinical Commissioning Groups - CCGs). Where it is demonstrated that existing facilities do not have capacity to accommodate patients from new development and that the development will result in an unacceptable impact on these existing local facilities, then a proportionate financial contribution or on-site provision will be sought and agreed through engagement with the ICS. In the first instance, any infrastructure contributions will be sought for expanding the capacity of existing services in the relevant Primary Care Network and secured through planning obligations.

Existing healthcare infrastructure will be protected unless it can be clearly demonstrated that its loss would not have an adverse impact on healthcare delivery, such as where a GP practice is relocating to new premises serving the same community, or where an NHS estate reorganisation programme is needed to ensure the continued delivery of public services and related infrastructure.

New facilities should be well served by public transport infrastructure and good access via legible walking and cycling routes. Where possible, new facilities should be located in local centres. Support will be given for co-location of compatible community services on one site.

Development proposals should be consistent with other Local Plan policies.

Key Evidence

- Infrastructure Delivery Plan

- CCG Estates Plans
- Public Health England: Spatial Planning for Health (2017)

Implementation

Local/national Funding	Development Management	Partners	Section 106 agreement	Supplementary Planning Document
	✓	✓	✓	✓

Education

- 9.2 As part of an infrastructure led approach, it is critical that existing social infrastructure such as education facilities are retained, and that new development facilitates improvements to existing education facilities or delivers new schools where population growth from the new development warrants this. It is important that new schools are of high-quality design with modern facilities and are central to new communities and something the community can feel proud of.
- 9.3 National policy confirms that planning policies ensure sufficient choice of school places are provided and that plans should set out the education contributions that are expected. Policy HC15 seeks to protect existing education facilities as well as provide contributions towards new and/or facilities where required, and ensure they are in sustainable and accessible locations.

Policy HC15: Education

Support will be provided for the expansion and/or improvement of educational facilities or the construction of new schools to meet demand generated by children in new development or to deliver necessary improvements and updates to education infrastructure. New education infrastructure will be required from new development in line with the latest Staffordshire Education Infrastructure Contributions Policy, which may include safeguarding of land for future school expansion. Proposals that do not provide contributions towards education infrastructure where it has been determined that these are necessary will be refused.

Existing Infant, Junior, First, Primary, Middle and Secondary school infrastructure will be protected unless a clearly demonstrated that the loss of the facility is supported by a robust business case and will not adversely impact education provision. New facilities should be well served by public transport infrastructure with good access via legible walking and cycling routes. Where feasible the council will aim to co-locate new facilities with local centres and will support the co-location of compatible community facilities with school provision.

Development proposals should be consistent with other Local Plan policies.

Key Evidence

- Infrastructure Delivery Plan

Implementation

Local/national Funding	Development Management	Partners	Section 106 agreement	Supplementary Planning Document
	✓	✓	✓	

South Staffordshire College (Rodbaston)

- 9.4 South Staffordshire College (Rodbaston) lies in the Green Belt to the south of Penkridge and to the east of the A449 Stafford Road. There has been an established agricultural college on the site for over 100 years and the college estate covers an area of 160 hectares. The area of the college complex is well defined by existing boundaries and internal access roads and there is an established wooded area close to Rodbaston Hall.
- 9.5 South Staffordshire College specialises in providing further and higher education courses for construction related industries and land-based activities such as fisheries and aquaculture, animal care and equestrian pursuits. It also offers a range of training services that support land-based businesses and in recent years has introduced an animal zone which has proved a popular visitor attraction. Extensive investment in recent years has enabled the development of a broad range of state-of-the-art learning centre facilities, equipment and buildings. It includes a working farm, animal care unit, veterinary nursing centre, indoor and outdoor equine centres, floristry centre, gardens and hot houses, a fisheries centre, visitors centre and animal zone. Some residential accommodation is also provided on the site.
- 9.6 The College supports 1,200 full time students, is an important local employer and provides opportunities locally for training and development in sectors such as agriculture, horticulture, animal care, veterinary care, equine and countryside management.

Policy HC16: South Staffordshire College (Rodbaston)

Within the Special Policy Area defined on the Policies Map, proposals for new development associated with the use of South Staffordshire College (Rodbaston) as an education and training establishment will be supported.

Proposals should demonstrate all of the following:

- a) That the development proposed is for education and training uses directly related to the activities of the College and can include business start up activities to support people into work in areas of employment related to College Curriculum subjects.
- b) That the development is of a scale and massing appropriate to its location.
- c) That the design and external appearance of the development is of a high standard and uses high quality materials which relate well to the development’s setting.
- d) where appropriate, re-use of existing buildings for uses which support the existing uses at South Staffordshire College.
- e) The provision of satisfactory access and vehicle parking.
- f) The incorporation of a satisfactory landscaping scheme, which complements and enhances the development and the local environment.
- g) That the development is located outside Flood Zones 2 and 3.
- h) That the development will not lead to the loss of sports facilities or, if it does, then compensatory provision/investment in sports facilities can be found in a suitable location elsewhere within the college estate. Any replacement sports provision must be equivalent if not better than that being replaced in terms of quality, quantity and accessibility.

Development proposals should be consistent with other Local Plan policies.

Key Evidence

- Staffordshire and Stoke Local Enterprise Partnership: Strategic Economic Plan (2018)

Implementation

Local/national Funding	Development Management	Partners	Section 106 agreement	Supplementary Planning Document
	✓			

Open Space

9.7 South Staffordshire is a community of communities, containing a dispersed settlement pattern of rural villages of a variety of sizes. These communities rely on a variety green infrastructure scattered throughout the district for a variety of social and

environmental benefits and contribute to their sense of identity. These green spaces range from large centrally located village greens and freestanding country parks through to incidental greenspaces within housing developments. It is vital that the local plan offers sufficient protection to such spaces and ensures new development delivers high quality spaces for the future.

- 9.8 The NPPF requires existing open spaces to be protected and emphasises the importance of access to a high-quality network of open spaces, highlighting the health and well-being, climate change and wider benefits for nature such spaces bring. It requires planning policies to be based on robust and up-to-date assessment of the need for open space, both in terms of quantitative and qualitative factors. To address these requirements this policy reviews the council’s existing open space standards, providing appropriate protections for existing open space and clear standards for open space quantity and design in new open spaces in residential development. It draws on the recommendations of the council’s open space evidence base and good urban design principles in setting new standards, ensuring that any new open space provided is both sufficient in quantity and is of a high quality.
- 9.9 Further guidance on the procedure for determining provision required from new development, offsite provision and maintenance arrangements will be set out in an Open Space, Sport and Recreation SPD. The council will also use best practice guidance documents (for example Fields in Trust’s ‘Guidance for Outdoor Sport and Play: Beyond the Six Acre Standard’) to inform open space delivery.
- 9.10 Once open space has been provided, arrangements for the ongoing maintenance of site will then need to be agreed with the council, with the current preference that the developer set up a management company for this purpose.

Policy HC17: Open Space

Existing open space should not be built on unless the conditions set out in paragraph 103 of the NPPF (or subsequent revisions) are met. This protection extends to all land performing an open space function, including, but is not limited to, all open space identified in the latest Open Space Audit.

The council will require 0.006 hectares of multi-functional publicly accessible open space per dwelling as standard. Development which would generate a need for 0.2ha of open space or more (i.e. sites of 33 dwellings or above) should provide this as on-site open space. Smaller areas of incidental green infrastructure without a clear recreational purpose (e.g. landscape buffers, highways verges) and areas without public access will not count towards meeting the quantitative on-site open space standard. Development requiring on-site open space should also include equipped high quality play provision that is accessible to all as a default, unless an alternative play provision strategy is agreed with the council.

On-site open space must be designed and located within development so as to maximise its recreational use and multifunctionality whilst benefiting from natural

surveillance. In doing so it should have regard to the wider roles that open space can play in supporting health and wellbeing, sustainable food production, biodiversity, public art, local heritage and climate change mitigation and adaptation. A landscaped approach should be used to provide a hierarchy of open spaces throughout any development layouts and designs which fail to adopt this approach to on-site open space design will not be supported. Opportunities to connect into existing green infrastructure networks will also be supported in line with Policy HC19. Developers must ensure that appropriate maintenance arrangements are agreed with the council and monitored post completion for any open space provided, having regard to the scale and function of such spaces.

Sites of between and including 10 and 32 dwellings will be required to provide an offsite financial contribution equivalent to the amount of open space that would otherwise be required on-site. This amount will be calculated having regard to both the costs of providing and maintaining off-site multi-functional open space.

Development proposals should be consistent with other Local Plan policies.

Key Evidence

- Open Space Strategy and Audit 2019
- Infrastructure Delivery Plan

Implementation

Local/national Funding	Development Management	Partners	Section 106 agreement	Supplementary Planning Document
	✓	✓	✓	✓

Sports Facilities and Playing Pitches

9.11 The opportunity for regular exercise is essential for people to live a healthy and fulfilling life into old age. Research shows that physical activity can also boost self-esteem, mood, sleep quality and energy, as well as reducing risk of stress. It is therefore important that current and future residents of South Staffordshire have access to sports facilities and playing pitches in order to participate in sporting activities.

9.12 Chapter 8 ‘Promoting healthy and safe communities’ of the NPPF states that ‘*access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities*’. The Framework goes on to state that plans should promote opportunities for new provision where there is an evidenced need as well as seek to protect existing facilities.

- 9.13 The policy approach is informed by the playing pitch and sport facilities assessments produced by specialists in 2020.
- 9.14 This policy seeks to prevent the loss of sports facilities and playing pitches within the district unless it is demonstrated that they are no longer needed or alternative provision is provided. In doing so applicants are encouraged to undertake an assessment in line with Sport England’s need assessment guidance for playing pitches and sports facilities. The policy also sets out how new residential development will contribute to the provision of new facilities or improvements to existing facilities to ensure there is capacity to cope with demand generated from new residents.

Policy HC18: Sports Facilities and Playing Pitches

There should be no loss of existing facilities or land used for sport, including playing fields, unless:

- a) an assessment has been undertaken which has clearly demonstrated that the land or facilities are surplus to requirement

OR

- b) alternative provision is made of at least equivalent quantity, quality and accessibility to local residents served by the existing facility, particularly by active travel methods, prior to any loss taking place

OR

- c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

All new major residential development will make a contribution towards sports facilities and playing pitches which will be secured through a S106 agreement and informed by the latest Sport Facilities and Playing Pitch Strategies.

The development or improvement of new playing fields and sports facilities will be supported in accordance with the latest Sport Facilities and Playing Pitch Strategies.

The council will prepare an Open Space, Sport and Recreation Supplementary Planning Document.

Development proposals should be consistent with other Local Plan policies.

Key Evidence

- Indoor Sports Facilities Strategy February 2020
- Indoor Sports Facilities Needs Assessment January 2020

- Playing Pitch Assessment Report January 2020
- Playing Pitch Strategy and Action Plan Sept 2020
- Infrastructure Delivery Plan
- Playing Pitch Requirements Topic Paper

Implementation

Local/national Funding	Development Management	Partners	Section 106 agreement	Supplementary Planning Document
	✓	✓	✓	✓

Green Infrastructure

9.15 Green and blue infrastructure is a network of integrated multi-functional spaces and features, not just individual elements, and comprises a number of different types of space including:

- Parks and Gardens (public and private).
- Natural and semi-natural greenspaces
- Green Corridors
- Outdoor sports facilities
- Amenity Green Space
- Play provision for children and teenagers
- Allotments
- Cemeteries and churchyard
- Accessible countryside in urban fringe areas
- River corridors, waterways, SuDS (blue infrastructure)
- Green roofs and walls
- Street-level greening

9.16 Benefits derived from this network include the promotion of a healthy and thriving natural environment, support for climate change resilience, personal health and well-being benefits and supporting prosperous communities. To deliver these benefits it is imperative that opportunities are taken to protect, strengthen and enhance the different elements of the green and blue infrastructure network and to promote the linkages which help to maximise the benefits which it can deliver. In addition to seeking the provision of on-site elements of multifunctional green infrastructure on development sites, opportunities to utilise biodiversity gains on site and off site will be supported particularly where this contributes to meeting objectives within the Nature Recovery Network plans.

9.17 The government recently produced a 25 year Environment Plan which highlighted the value of the green infrastructure in delivering a wide range of environmental, social and economic benefits. The NPPF identifies the key role which green infrastructure

can play in supporting and enabling healthy lifestyles and in mitigating environmental harms such as poor air quality.

- 9.18 The provision of green infrastructure will be actively sought on all development sites and will form a key element in the masterplanning and design of the strategic development site proposals in the Local Plan. Further strategic guidance on green infrastructure provision will be set out in a Green Infrastructure SPD.

Policy HC19: Green Infrastructure

The council will support the protection, maintenance and enhancement of a network of interconnected, multi-functional and accessible green and blue spaces.

All development proposals should seek to maximise on-site green infrastructure. Where suitable opportunities exist, taking into account local circumstances and priorities, development must demonstrate it has sought to strengthen and promote connectivity with the existing green infrastructure network by:

- Providing interlinked multifunctional publicly accessible open space within new development schemes including public open spaces, attractive cycle and walkways, street trees, green roofs and walls, pocket parks, allotments, play areas and new wetland habitats.
- Identifying and strengthening potential linkages with green and blue spaces within adjoining developed areas to promote interconnected urban green infrastructure.
- Connecting together and enriching biodiversity and wildlife habitats.
- Strengthening green linkages with the wider countryside and major areas of open space such as country parks.

Development proposals must make adequate provision for the long term management and maintenance of the green infrastructure network.

Development proposals should be consistent with other Local Plan policies.

Key Evidence

- A Green Future: Our 25 Year Plan to Improve the Environment (2018)
- Infrastructure Delivery Plan

Implementation

Local/national Funding	Development Management	Partners	Section 106 agreement	Supplementary Planning Document
	✓	✓	✓	✓

Part D: Economic Prosperity

10. Building a strong local economy

Sustainable Economic Growth

- 10.1 South Staffordshire currently contains four existing freestanding strategic employment sites at i54, ROF Featherstone/Logic 54, Hilton Cross and Four Ashes, which accommodate a large proportion of the district’s employment land supply and have good access to the strategic road network. The employment offer on the larger freestanding sites is complemented by a number of smaller industrial estates located both within some of the district’s existing settlements, and in the wider functional economic market area (e.g. the urban area of the Black Country). Within the wider rural area, employment, tourism and recreation opportunities are driven by appropriate rural diversification and small-scale start-up businesses.
- 10.2 Recognising the range of employment opportunities across the district, multiple policy approaches are proposed in Policy EC1 to allow for sustainable employment growth within the district. This is in line with the NPPF requirement for Local Plans to set out an area’s economic vision and strategy over the plan period.
- 10.3 A sustainable economic growth policy is set out, indicating how the council will encourage growth including inward investment in key growth sectors such as Auto-Aero and Agri-Tech. The policy identifies the types of locations that new employment growth will be permitted within, and how this will be done in an environmentally sensitive manner. As part of this policy the newly consented strategic rail freight interchange known as West Midlands Interchange (WMI) is recognised as a new freestanding strategic employment site, recognising the scale and strategic location of the site, alongside the additional employment land it contributes to the council’s, and wider regions, supply. A sixth freestanding strategic employment site is also proposed through the allocation of a new employment site at M6 Junction 13, Dunston. A corresponding policy approach (in Policy EC2) will protect existing sources of employment, unless specific tests are met.

Policy EC1: Sustainable Economic Growth

The council, working in partnership with businesses, Staffordshire County Council, the Staffordshire and Stoke Local Enterprise Partnership and other key stakeholders, will support measures to sustain and develop the local economy of South Staffordshire and encourage opportunities for inward investment and further economic development of the district. Inward investment that accords with the spatial strategy in potential growth sectors such as advanced manufacturing will be supported, along with business growth that supports decarbonisation and the district’s journey to net zero.

Through the existing supply of available employment land and allocations in this plan the council will ensure there is sufficient supply of employment land to meet the

needs of the district over the plan period, as well as contributing towards the employment needs of our wider functional economic market area arising from the Black Country authorities.

Live/work units and proposals that support home working that reduce commuting journeys will be supported, subject to complying with other development plan policies.

Employment proposals should be accessible via sustainable travel modes, including clear and legible walking and cycling routes. Employment proposals will only be supported where the necessary on and off-site infrastructure is provided, including the necessary highways mitigation measures.

Where B8 use logistics/warehousing is proposed, the council will support proposals to deliver adequate overnight HGV parking to deliver economic growth. It will also support proposals for new or expanded HGV parking in a manner consistent with the latest Freight Strategy for Staffordshire.

Preference will be given to the use of sustainable previously developed land for employment development having regard to factors such as biodiversity and sustainable transport links.

Economic growth will be primarily focused on the district's six strategic employment sites:

- Four Ashes
- Hilton Cross
- i54 South Staffordshire
- M6 Junction 13, Dunston
- ROF Featherstone/Logic 54
- West Midlands Interchange (WMI)

There will be strong in principle support for employment development within the development boundaries of these sites that is in line with their allocation and/or substantive planning permission and that result in significant job creation. At i54 (including the i54 western extension) only proposals that fall within use class E(g) and B2 will be supported. Development at the strategic employment sites should be of high quality and facilitate the creation/enhancement of multifunctional green spaces and the enhancement of the Green Infrastructure Network.

There is also support for employment development within existing employment areas and within the Tier 1 and Tier 2 villages identified within the settlement hierarchy subject to other policy requirements including ensuring proposals do not have an unacceptable impact on local amenity.

Elsewhere in the district diversification of the rural economy will be supported in line with Policy EC4, particularly where proposals would contribute towards climate

change mitigation and other environmental benefits where compatible with other planning policies.

Development proposals should be consistent with other Local Plan policies.

Key Evidence

- Economic Development Needs Assessment – update 2024
- Economic Development Needs Assessment 2022
- Economic Development Needs Assessment – Employment Land Availability Assessment (2021)
- West Midlands Strategic Employment Sites Study 2021
- Staffordshire and Stoke Local Enterprise Partnership: Strategic Economic Plan (2018)
- Infrastructure Delivery Plan

Implementation

Local/national Funding	Development Management	Partners	Section 106 agreement	Supplementary Planning Document
✓	✓			

Retention of employment sites

- 10.4 Having a varied portfolio of employment sites – from small local premises in our villages to large standalone strategic employment sites – is a key aspect of supporting the local economy and providing job opportunities to local residents. It is therefore essential that there are local policies that guard against the loss of valued business premises and employment land.
- 10.5 It is acknowledged that there may be specific circumstances where an existing business premises has been left unoccupied and is unviable, or where an employment allocation or permission has not come forward where an alternative use may be appropriate. It is important that the Local Plan sets out where this could be the case.
- 10.6 The lack of viability of an existing business may lead to proposals to find an alternative use, in which case, the applicant will be expected provide full details of at least 12 months marketing of the site/premises for employment use. Experience has demonstrated that even well-located plots in high quality employment area (e.g. i54 South Staffordshire) can be on the market for a number of years before an end user is secured. Therefore, it is essential that the 12 months marketing period is recognised as a minimum, and a longer marketing period may be warranted for employment premises/sites that play – or have the potential to play – a greater role in supporting the local economy.

Policy EC2: Retention of employment sites

Development that would result in the loss of an existing designated employment area (as defined on the policies maps) in whole or part; or a site/premises which is currently, or was last, used for industrial or commercial purposes (classes E(g), B2, B8 or related sui generis) will not be permitted unless it can be demonstrated that:

- a) The retention of the site or premises for use classes E(g), B2 or B8 use has been fully explored without success. Proposed development that would see the loss of sites or premises should be subject to a period of marketing, with detailed evidence of the marketing undertaken submitted with the planning application. The length and extent of the marketing should be proportionate to the sites or premises importance to the local economy and should typically be for a minimum 12 month period on terms that reflect the lawful use and condition of the premises

OR

- b) The redevelopment would result in significant economic benefits to the area, for example by facilitating the relocation of a business to a more appropriate site in the district.

Proposals for alternative uses must not prejudice the continued operation and viability of existing or allocated employment areas and any other neighbouring uses.

If an existing employment use in a designated employment area is considered to be unviable and the applicant is seeking a change of use to an alternative employment use class, then a period of marketing must be evidenced with the planning application.

There is a strong presumption that the strategic employment sites at i54 South Staffordshire; Hilton Cross, ROF Featherstone, Four Ashes, West Midlands Interchange and M6 Junction 13, Dunston are retained for employment use and used for employment purposes that accord with their allocation and/or substantive planning permissions and their strategic planning and economic objectives.

Development proposals should be consistent with other Local Plan policies.

Key Evidence

- Economic Development Needs Assessment - update (2024)
- Economic Development Needs Assessment (2022)
- Economic Development Needs Assessment – – Employment Land Availability Assessment (2021)
- Stoke and Staffordshire LEP Strategic Economic Plan (SEP)

Implementation

Local/national Funding	Development Management	Partners	Section 106 agreement	Supplementary Planning Document
	✓	✓		

Employment and Skills

- 10.7 Future development within South Staffordshire should provide opportunities for employment and training for residents. It is important that local people should have the opportunity to directly benefit from the construction of new development within their area. Such opportunities will encourage existing local communities to engage with the new development and enable them to directly take advantage of the associated economic and social benefits.
- 10.8 Maximising use of the local workforce will reduce the distance construction workers, other employees and end occupiers will need to travel to work, with local people also being more likely to use sustainable modes of transport. This will reduce the number and/or length of private motor vehicle journeys, reducing carbon emissions.
- 10.9 An Employment and Skills Plan (ESP) will therefore be required for developments of 100 or more residential units or 5000sqm of commercial floorspace. This will ensure that local communities benefit from the larger development which provide greatest employment opportunities whilst not placing disproportionate requirements on smaller scale developments. It is also considered that commercial developments of less than 5000sqm down to 1000sqm may also require an ESP, however this will depend on the nature of the proposal.
- 10.10 Whilst the strategies vary from scheme to scheme, the EPS will typically set out the steps that will be taken to deliver on agreements, including:
- construction apprenticeships
 - local employment during the construction phase
 - construction work experience opportunities
 - end use apprenticeships
 - local procurement opportunities
- 10.11 Early engagement with the council’s Enterprise Team is required to ensure that a full range of opportunities are identified.

Policy EC3: Employment and Skills

An Employment and Skills Plan (ESP) will be required for developments of 100 or more residential units or 5000sqm of commercial floorspace. For commercial developments of less than 5000sqm down to 1000sqm, applicants are required to undertake early

discussions with the council’s Enterprise Team to determine if an ESP is required, informed by the number of jobs the development will support.

The ESP should outline exactly what the development will provide in terms of employment and training opportunities to local residents. This will be secured by a legal agreement or planning condition.

The Plan must clearly outline how the developer will deliver the ESP in cooperation with the local authority. This will include reference to specific and measurable outputs, key delivery partners and details on the timeframe within which each output will be delivered.

Development proposals should be consistent with other Local Plan policies.

Key Evidence

- ONS/NEET datasets

Implementation

Local/national Funding	Development Management	Partners	Section 106 agreement	Supplementary Planning Document
	✓	✓	✓	

Rural Economy

10.12 South Staffordshire is a largely rural district, and it is therefore important that the Local Plan sets put a policy approach that strikes the correct balance between supporting rural businesses whilst protecting the rural character and natural environment. There is recognition of the need to diversify the rural economy whilst enabling farmers to continue managing the rural landscape. Often such diversification can have dual benefits of supporting the primary agricultural activity of the farm and local economy whilst also having wider environment benefits. However, often there can be competing interest in rural area and so a balance between food production and other uses that have a positive impact, e.g. solar farms, is needed.

10.13 Farm complexes, with a range of different sized buildings, can offer scope for alternative employment uses that support the rural economy in preference to other uses which may be less sustainable, such as conversions to residential uses. The re-use of rural buildings for employment uses could provide opportunities for residents to gain employment locally, reducing the need to travel. Rural employment proposals outside of development boundaries will need to be supported by a business case that will be independently verified by an expert which will be paid for by the applicant.

- 10.14 For the purposes of Policy EC4, rural employment is not restricted to E(g), B2, B8 employment use classes but includes other employment generating use classes including proposals for non-accommodation tourism businesses. Proposals for tourist accommodation will be assessed against Policy EC5.

Policy EC4: Rural Economy

1. Rural employment within villages

To support sustainable economic growth in rural areas proposals that create new employment generating uses or support the sustainable growth and expansion of existing businesses within village development boundaries as defined in this plan will be supported in principle where the scale of development would be in-keeping with the tier and scale of the village and be in character and scale with the location.

2. Rural employment outside development boundaries

Rural employment proposals for employment development in locations outside development boundaries will only be supported where all of the following criteria are satisfied:

- a) It is small in scale.
- b) It comprises the conversion and reuse of rural buildings.
- c) The development is not capable of being located within the development boundaries of a village, by reason of the nature of the operation or the absence of suitable sites.
- d) It is supported by an appropriate business case which demonstrates that the proposal will support the local economy, which in turn would help sustain rural communities. Additional guidance on the nature of the business case requirements will be provided through a Rural Development SPD.
- e) The development is accessible by a choice of means of transport including walking, cycling and public transport.
- f) The local highway network is capable of accommodating the traffic generated by the proposed development.

3. Conversion and re-use of rural agricultural buildings

The sustainable re-use of rural agricultural buildings will be supported with the preference for re-use for rural employment uses. Proposals for non-employment generating uses will only be supported where it can be demonstrated through marketing at a realistic price for at least 12 months, and on terms reflecting the

condition of the premises, that an appropriate employment use is not viable. The loss of employment uses in rural areas will need to conform to Policy EC2.

Proposals for the conversion and re-use of rural agricultural buildings must demonstrate all of the following:

- a) That the building is structurally sound and in a condition capable of conversion without demolition and rebuilding, or substantial reconstruction.
- b) That the building is no longer needed for the overall agricultural activity of the farm holding.
- c) That the building is capable of conversion without detrimental alterations affecting its character, appearance, significance, general setting and immediate surroundings.
- d) High quality design and use of materials that respect the rural character and local distinctiveness of the area.

4. Farm Diversification

Farm diversification such as those that support the engagement of communities with land management, rural crafts and the development of local produce markets will be supported in principle provided that all of the following criteria are met:

- a) The development will not cause significant or unacceptable harm to the character and appearance of the landscape and avoids the loss of large areas of higher quality agricultural land.
- b) There is no adverse impact upon amenity or the historic environment. Historic farmsteads must be appropriately and sensitively re-used where appropriate, whilst ensuring the form, scale and layout of the site respects the historic farmstead and its relationship with the surrounding landscape within which it is situated.
- c) The proposals contribute positively to the maintenance of biodiversity, climate change and food security.
- d) The proposal makes use of existing buildings wherever possible. Where new or replacement buildings are required they are closely related to the existing group and their siting, form, scale, design and external materials are in harmony with existing traditional buildings.
- e) The proposal forms part of a comprehensive diversification scheme and is operated as a subsidiary to a sustainable farming business or appropriate land-based enterprise and will contribute to making the existing business viable.

- f) The approach roads and access to the site have the capacity to cater for the type and levels of traffic likely to be generated by the development.
- g) The proposal will benefit the local rural economy.

Proposals which generate high levels of traffic or increased public use will only be permitted where they can be easily accessed by public transport, foot and cycle modes.

Development proposals should be consistent with other Local Plan policies.

Implementation

Local/national Funding	Development Management	Partners	Section 106 agreement	Supplementary Planning Document
	✓			✓

Tourist accommodation

- 10.15 The district is predominantly rural with attractive villages and picturesque countryside making many parts of the district attractive to the visitor economy. The tourism and visitor economy sector is an important employer within the district whilst also bringing economic benefits.
- 10.16 However, in rural locations, a balance should be achieved between supporting the rural economy and protecting the rural areas from inappropriate development, as stated in the NPPF.
- 10.17 To maximise the benefits of tourism to rural economies, tourist development should be proportionate and located where visitors can access local shops, pubs and other services.
- 10.18 Camping and caravan sites contribute in an important way to tourism and to the supply of tourist accommodation supporting the rural economy. However, they should be located appropriately and sufficiently screened to avoid any harmful impact on the setting and character of the countryside.
- 10.19 To ensure that the district's countryside is protected from inappropriate conversions of new tourist accommodation, a reasonable business plan - i.e. costings and business model, will be required for new tourist accommodation proposals to ensure the long-term viability of such proposals. The business plan will be independently verified by an expert which will be paid for by the applicant.

EC5: Tourist accommodation

Proposals for tourist accommodation within development boundaries will be supported subject to compliance with other policies within this plan. Proposals should be proportionate, relative to the size of the settlement.

Proposals for small scale or expansion of tourist accommodation outside of development boundaries, will be permitted provided that all of the following criteria are met:

- a) The demand for the development has been clearly demonstrated.
- b) The proposal is connected to and associated with existing facilities or located at a site that relates well to defined settlements in the area and is accessible to adequate public transport, cycling and walking links.
- c) The proposal would not materially adversely affect the character, appearance and amenity of the surrounding area, any heritage assets and their setting and include appropriate mitigation where necessary to ensure this.
- d) Where applicable, proposals should conserve and, where possible, enhance the significance of heritage assets, including their setting
- e) Appropriate, convenient and safe vehicular access can be gained to/from the public highway and appropriate parking is provided.
- f) The proposal would not use the best and most versatile agricultural land.
- g) The development will be served by adequate water, sewerage and waste storage and disposal systems.
- h) The proposal includes a high-quality landscaping scheme.

In addition, tourist accommodation proposals will be required to include a business plan that will demonstrate the long-term viability of the scheme.

Proposals for large scale standalone tourist accommodation outside of development boundaries will not normally be supported.

The occupation of new tourist accommodation will be restricted via condition or legal agreement to ensure a tourist use solely and not permanent residential occupation.

The change of use from tourist accommodation to residential will not normally be permitted unless it is demonstrated that its continued use as tourist accommodation is no longer viable.

Development proposals should be consistent with other Local Plan policies.

Implementation

Local/national Funding	Development Management	Partners	Section 106 agreement	Supplementary Planning Document
	✓		✓	

Rural workers dwellings

- 10.20 Paragraph 84 of the 2023 NPPF makes clear that Local Planning Authorities should avoid isolated new homes in the countryside unless there are special circumstances. One of these circumstances are if 'there is an essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside'.
- 10.21 Rural workers are normally those involved in the agricultural or forestry industries. It will often be more convenient and sustainable for such workers to live in nearby settlements, or suitable existing dwellings, so avoiding new and potentially intrusive development in the countryside.
- 10.22 However, there will be some cases where the nature and demand of work in agriculture, forestry or other rural industries makes it essential for one or more people engaged in the enterprise to live at, or very close to, the site of their work.
- 10.23 The council will assess all applications for planning permission for new rural workers dwellings in the countryside in detail, to ensure that these are genuine proposals, which are reasonably likely to materialise and are capable of being sustained long term. Therefore, any application for a rural workers dwelling will need to be accompanied by an appraisal setting out the need for the dwelling and that the enterprise the dwelling is serving will be long term financially viable. The appraisal which will be independently verified by an expert which will be paid for by the applicant.
- 10.24 The council will also consider removing certain permitted development rights for any dwelling permitted under this policy, to ensure that the dwelling remains at a size which can be justified by the functional need and can be supported by the income from the agricultural unit.

Policy EC6: Rural workers dwellings

1. Proposals for new rural workers dwellings

New isolated dwellings in the countryside intended for occupation by rural workers will not be permitted unless it can be shown that there is an essential need for a rural worker to live permanently at or near their place of work within the countryside. If a new dwelling is essential to support a new farming activity, whether on a newly-

created agricultural unit or an established one, it should be a temporary dwelling for the first three years. New rural workers dwellings will only be supported where all of the following criteria are met:

- a) There is a clearly established existing functional need.
- b) The need relates to a full-time worker, or one who is primarily employed in rural employment and does not relate to a part-time requirement.
- c) The unit and the rural employment activity concerned have been established for at least three years, have been financially sound for at least one of them, are currently financially sound, and have a clear prospect of remaining so.
- d) The functional need could not be fulfilled by another existing dwelling on the unit, or any other existing accommodation in the area which is suitable for occupation by the workers concerned or by converting existing redundant buildings on site.
- e) Other planning requirements, e.g. in relation to access, or the impact on the countryside are satisfied.

An assessment setting out the need for the dwelling should be submitted with any application which will be verified by an independent expert.

2. Removal of Conditions

Where agricultural or forestry dwellings are permitted, appropriate conditions will be used to retain the dwelling for rural worker occupation. Applications to remove these conditions will not be permitted unless all of the following criteria are met:

- a) The dwelling is no longer needed on that unit for the purposes of agriculture or forestry.
- b) There is no current demand for dwellings for rural workers in the locality.
- c) The dwelling cannot be sold or let at a price which reflects its occupancy condition within a reasonable period.

Development proposals should be consistent with other Local Plan policies.

Implementation

Local/national Funding	Development Management	Partners	Section 106 agreement	Supplementary Planning Document
	✓			✓

Equine related development

- 10.25 Equine-related development refers to all horse-related facilities including commercial and householder development of stables, manèges and ancillary buildings. Whilst it is recognised that equestrian development is a rural use, development needs to be carefully managed to ensure that it does not have a detrimental impact on the countryside character or other rural uses.
- 10.26 The availability of suitable off-road routes will need to be considered, providing a safe and traffic free route for horse riders to use.
- 10.27 Proposals for larger scale equine enterprises should be supported by a business case demonstrating that the enterprises will be viable in the long term. The business case will be independently verified by an expert which will be paid for by the applicant.

Policy EC7: Equine related development

Horse related facilities and equine enterprises in the Green Belt and Open Countryside will be supported provided that all of the following criteria are met:

- a) New buildings in association with equine development such as stables and field shelters are sited within close proximity to any existing rural buildings or settlement pattern to reduce the impact on the local landscape.
- b) The scale, design and external materials should be sympathetic to the rural character of the area in which the building(s) are situated.
- c) The number of stables is proportionate to the reasonable equestrian leisure needs of the applicant balanced against the need to protect the countryside and character of the landscape whilst according with The British Horse Standards.
- d) The proposal does not have an adverse impact on the natural environment and the integrity of designated protected sites.
- e) Any associated developments such as menages are sympathetic to the character of the area.
- f) The proposal is located close to the bridleway network and is located so as to reduce conflict between road users due to the transportation of horses, deliveries and horses using narrow lanes.

Proposals for larger scale equine enterprises will be considered on whether they will be beneficial to the local rural economy through a business case demonstrating sound financial planning and should be consistent with other local planning policies.

Development proposals should be consistent with other Local Plan policies.

Implementation

Local/national Funding	Development Management	Partners	Section 106 agreement	Supplementary Planning Document
	✓			✓

11. Community services, facilities and infrastructure

Retail

- 11.1 The role and function of town centres nationally is changing as people shop and undertake leisure activities in different ways than they have done in the past, particularly within a post-Covid-19 context. As such, retail centres are adapting to accommodate the increasing pressures being placed upon retail services with this squeeze being felt in all locations. The Local Plan seeks to support and enhance the respective role of each centre, including – where appropriate – diversifying the range of uses in-centre that do not compromise its primary shopping function by remaining attractive, diverse, and accessible to those wishing to use them. This is especially important in South Staffordshire as the retail offer is localised and concise, reflecting the rural, village-based nature of the district.
- 11.2 It is for these reasons that this plan will support new retail and town centre developments across the district that accord with the NPPF’s ‘centres first’ approach. Furthermore, the NPPF supports the identification of a centre’s hierarchy as well as designated centres so as to require main town centre uses to be appropriately located. The centres hierarchy in South Staffordshire is refreshed through this Local Plan due to the need to promote a vibrant and viable centres hierarchy that is able to respond to the changing needs of local communities. As such, a centres hierarchy along with updated retail impact assessment and sequential test thresholds, have been established thorough the commission of a Retail Centres Study.
- 11.3 Qualitative rather than quantitative improvements should be encouraged within designated centres. This will assist in ensuring the proper protection and recognition of retail facilities and services within the district, enhance their character, attractiveness, preserve their heritage conservation, and lead to the centre becoming more economically successful. This includes provision for other town centre uses, as healthy centres usually have a good mix of higher and lower order shops and a balance between provision that ensures flexibility. Expanding centres beyond their more traditional retail roles is considered a key mechanism by which to survive and flourish. This was reflected through the government’s decision to amend the Use Class Order in September 2020. Nevertheless, the retention of majority E class use will be

an important element of supporting the longevity of centres, ensuring that units are occupied, and the retail function remains primal.

Policy EC8: Retail

Proposals will maintain and enhance the vitality and viability of South Staffordshire’s network of centres in line with national policy, taking into account any local regeneration strategies where appropriate as well as the requirements of this policy and other settlement specific policies/guidance. This includes proposals being accessible by a choice of means of transport including walking, cycling and public transport.

The council will seek to support and deliver public realm enhancement schemes, parking provision, highways measures and sustainable transport infrastructure as defined in the Infrastructure Delivery Plan (IDP).

Proposals should be appropriate in scale and type to the role of centres, respect their (historic) character, environment, and local distinctiveness. Proposed uses will make a demonstrable positive contribution to the overall role and functionality of the centre by maintaining/enhancing the centre’s retail, cultural and/or community offer.

Proposals should be of a high-quality design and accord with the design policies of this plan alongside any design SPDs and the NPPF.

Development proposals must accord with all other relevant plan policies.

Designated Centres

The council will designate, protect, and where possible enhance, a network of centres consisting of Large Village Centres, Village Centres, and Neighbourhood Centres. The Retail Centres Hierarchy, or network of centres for South Staffordshire is set out below. The boundary of each designated centre has been produced within the Local Plan Policies Map. These boundaries will be kept under review.

	Centre	Location
Large Village Centres	Codsall	The Square, Station Road
	Penkridge	Market Street
	Wombourne	High Street
Village Centres	Brewood	Market Place
	Codsall	Birches Bridge
	Coven	Brewood Road
	Cheslyn Hay	High Street
	Great Wyrley	Quinton Court
	Kinver	High Street
	Pattingham	The Square
	Perton	Anders Square
Neighbourhood	Bilbrook	Duck Lane, Bilbrook Road, Lane Green Road

Centres	Cheslyn Hay	Glenthorne Drive
	Essington	Hill Street
	Featherstone	The Avenue
	Great Wyrley	Tower View Road
	Great Wyrley	Walsall Road North
	Great Wyrley	Walsall Road South
	Huntington	Stafford Road
	Kinver	Potters Cross
	Penkridge	Boscomoor Shopping Centre
	Shareshill	Church Road
	Swindon	High Street
	Wheaton Aston	High Street
	Wombourne	Bull Lane
	Wombourne – Blakeley	Common Road, Giggetty Lane
	Wombourne	Planks Lane

There is a presumption in favour of accommodating E class uses and other Main Town Centre uses within the Large Village Centres. Such uses will be supported as complementary offers in Village Centres where their function is to primarily to serve the village and in Neighbourhood Centres where their function is to primarily serve the day-to-day needs of immediate local residents.

A small quantity of retail provision is to be delivered on each of the SUEs as described in Policies SA1 and SA2 to support the existing Retail Centres Hierarchy. Each of which will be reviewed for inclusion on the Retail Centres Hierarchy as part of the next Local Plan review process.

Other Town Centre Uses

Proposals that reduce the concentration of E-class uses within a centre will not be supported, unless it is demonstrated that it supports wider significant regeneration of the centre and does not impose undue dominance of non-Main Town Centre uses. Consideration will be had to the number, proximity and continuance of other non-E class uses, and the compatibility of the proposal with nearby uses.

Proposals for other uses, including residential, will be assessed on a case-by-case basis, subject to the creation/preservation of a satisfactory residential environment and ensuring the functionality of the centre is not undermined.

Residential uses will not be permitted at ground floor level (except for the provision of access arrangements). Changes to residential use on the first floor or above will be supported as long as they do not compromise the ability of the ground floor unit to operate either as existing or by making future retail accommodation impractical. For example, consideration will be given to loss of storage space, preparation areas and delivery areas.

Proposals for hot food takeaways are expected to:

- a) not result in significant harm to the amenity of nearby residents or highways safety; and
- b) not result in harmful cumulative impacts due to the location of existing or consented proposed outlets.

Out-of-Centre Proposals

The council will not permit proposals in edge-of, or out-of-centre locations for retail and other Main Town Centre uses unless they satisfy the sequential test and impact assessment. This includes proposals for the expansion of existing uses and applications to vary existing conditions.

A sequential test will be required for new Main Town Centre uses outside of a designated centre in line with national policy and guidance.

An impact assessment will be required for all retail uses that exceed the following **net** floorspace thresholds both in, edge-of, and out-of-centre:

- Convenience floorspace – 500m²
- Comparison floorspace - 300m²

The impact assessment must be prepared in line with national policy and guidance.

Catchment areas for both sequential tests and impact assessments will be considered on a case-by-case basis to reflect the application/site specific circumstances under consideration.

Development proposals should be consistent with other Local Plan policies.

Key Evidence

- South Staffordshire Retail Centres Study (2021)
- Rural Services and Facilities Audit (2021)

Implementation

Local/national Funding	Development Management	Partners	Section 106 agreement	Supplementary Planning Document
	✓			

Protecting community services and facilities

- 11.4 The presence of community facilities within our villages is key to maintaining community cohesion, quality of life and reducing the need to travel. Community services and facilities are often the cornerstone of villages and include pubs, shops, post offices, banks and building societies, community buildings and meeting places, sports venues, cultural buildings, places of worship and health facilities. Having a policy that protect against the loss of community services and facilities is therefore critical. This policy ensures that specific criteria must be met for development that would result in the loss of a community facility to be supported, including a robust marketing exercise confirming that the use is no longer viable and ensuring that alternative provision is accessible.

Policy EC9: Protecting community services and facilities

The council will support the development and retention of local services and community facilities to meet local needs and to promote social wellbeing, interests, interaction, and healthy inclusive communities. Development proposals that would result in the loss of uses, buildings or 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.

Development for the relocation of community services and facilities will only be permitted where alternative provision is made of at least equivalent quality and accessibility to local residents served by the existing facility, particularly by active travel methods, prior to the loss of the existing facility.

Development proposals should be consistent with other Local Plan policies.

Key Evidence

- Rural Services and Facilities Audit 2021
- Assets of Community Value
- Open Space Standards Paper 2019

Implementation

Local/national Funding	Development Management	Partners	Section 106 agreement	Supplementary Planning Document
	✓			

Wolverhampton Halfpenny Green Airport

- 11.5 Wolverhampton Halfpenny Green Airport is situated within the Green Belt in a quiet rural area surrounded by attractive countryside. The site is served by rural roads as there is a lack of strategic road access or public transport services. The council supports the existing General Aviation role of the airport and also recognises the importance of the existing non-aviation uses on the site for the viability of the airport. The council considers that continuing the current general aviation role of the Airport with a ‘gentle evolution’ within the existing defined role and boundaries to be the right balance to supporting adaptation, where necessary, whilst respecting the character of the surrounding rural environment.
- 11.6 The government’s General Aviation Strategy (2015) identified the importance of General Aviation as a flourishing, wealth generating and job producing sector of the economy. National planning policy identifies the importance of maintaining a national network of General Aviation airfields and recognising the need for adaptation to meet changing circumstances.
- 11.7 The council will continue to work with the Airport owners and operators to deliver a sustainable future for the airport. The replacement of obsolete wartime buildings with new high-quality development will generally be supported, subject to being consistent with other Local Plan policies. The existing non-aviation uses on the site are accepted but the overall aim is that existing buildings should be used for aviation uses related to the General Aviation role of the airport.

Policy EC10: Wolverhampton Halfpenny Green Airport

The council supports the role of Wolverhampton Halfpenny Green Airport as a General Aviation airport.

Development proposals, including the replacement of existing outdated buildings and high-quality infill development directly related to the General Aviation role of the airport and situated within the developed area of the site (as defined on the policies map) will be supported. New development unrelated to this role will not be supported.

The council will support the continued occupation of the site by existing non-aviation businesses that play an important role in ensuring the viability of the airport.

The council will resist development proposals that would have a detrimental impact on the environment and the amenity of nearby residents including the physical expansion of the site, extensions to runways and the operation of commercial passenger and freight services. Development proposals relating to the existing uses required for safe and efficient operation of the airport will be supported.

Development proposals should be consistent with other Local Plan policies.

Key Evidence

- Department for Transport – General Aviation Strategy (2015)

Implementation

Local/national Funding	Development Management	Partners	Section 106 agreement	Supplementary Planning Document
	✓			

Infrastructure

- 11.8 The council and its partners will ensure that development within the district contributes towards the creation of sustainable communities, and where appropriate infrastructure is provided. Infrastructure can be very large schemes such as a new road, or much smaller such as a piece of play equipment or signage.
- 11.9 Other infrastructure requirements of new development include the availability of utilities such as telecommunications, electricity, gas, water and wastewater treatment facilities. The council will work with the organisations responsible for delivering this essential infrastructure in the district.
- 11.10 The council have produced an Infrastructure Delivery Plan (IDP) which sets out the infrastructure requirements across the district and how it will be delivered and will inform what infrastructure is required for planning applications to comply with Policy EC11. This will range from larger infrastructure requirements such as on site parking, through to financial contributions towards household waste and recycling equipment such as bins. The council, alongside its partners, will work towards ensuring the delivery of the infrastructure requirements set out in the Plan.

EC11: Infrastructure

Planning permission will only be granted for proposals that have made suitable arrangements for the improvement or provision of infrastructure necessary to make the scheme acceptable in planning terms.

The council will work with infrastructure providers, agencies, organisations and funding bodies to enable, support and co-ordinate the delivery of infrastructure to support the delivery of the growth identified within this Plan.

Developers and landowners must work positively with the council, neighbouring authorities and other infrastructure providers throughout the planning process to ensure that the cumulative impact of development is considered and then mitigated, at the appropriate time, in line with their published policies and guidance.

New development will be required to deliver or contribute towards the timely provision of essential supporting infrastructure either directly as part of the development, or through an appropriate financial contribution.

The infrastructure requirements for the strategic sites allocated within this Plan will be set out via their corresponding policies, master planning process and IDP.

Development proposals should be consistent with other Local Plan policies.

Key Evidence

- Infrastructure Delivery Plan

Implementation

Local/national Funding	Development Management	Partners	Section 106 agreement	Supplementary Planning Document
✓	✓	✓	✓	

Sustainable transport

- 11.11 Active travel gives people an opportunity to be physically active as part of their daily routine, which can contribute to improved health and help to prevent or manage a range of chronic diseases. Using active travel also incorporates physical activity into everyday tasks, which can reduce the need to find extra time or money to exercise specifically for the health benefits.
- 11.12 Making shorter journeys using active means of travel can contribute to reducing congestion by fewer motorised vehicles on the road, also reducing pollution and carbon emissions. In urban areas, journey times can often shorter when walking or cycling as users are able to take advantage of paths not accessible to motor vehicles.
- 11.13 The internal design of new developments should prioritise walking and cycling, as well as public transport, over private vehicle movements, to ensure that they encourage shorter internal journeys to take place by these modes.

- 11.14 In 2022 the government launched a new executive agency called Active Travel England. The agency builds on the government’s commitment towards boosting cycling and walking and deliver a healthy, safe and carbon-neutral transport system.
- 11.15 Chapter 9 of the NPPF ‘promoting sustainable transport’ describes how planning policies should consider the potential impacts of development on transport networks as well as promote more sustainable modes of transport.
- 11.16 Staffordshire County Council is responsible for roads and public transport in the district. National Highways are responsible for the motorways and a number of major A roads within the district. The council will continue to work with partners including Staffordshire County Council, neighbouring highways authorities, National Highways, Network Rail, Bus and rail providers and Active Travel England to promote sustainable transport schemes and new infrastructure across the district.

EC12: Sustainable transport

The council will work proactively with partners to promote sustainable transport measures and deliver high quality transport infrastructure and links across the district. This includes opportunities to improve bus and rail services and connections including making provision from increased demand from new development within the district.

The Local authority will work with Staffordshire County Council to prepare a Local Walking & Cycling Infrastructure Plan to identify strategic opportunities for walking and cycling improvements throughout the district.

Developers of major developments or where a proposal is likely to have significant transport implications will be required to demonstrate they have maximised opportunities for sustainable travel and will make adequate provision to mitigate the likely impacts through provision of a Transport Assessment and Travel Plan. All other developments will be required to submit a Transport Statement where appropriate.

All new developments will be required to demonstrate all of the following:

- a) Designed to maximise opportunities for walking, cycling and the use of public transport, ensure the safe movement of vehicles and minimise the impact of parked and moving vehicles on residents, business and the environment. Developments should adhere to the standards set out within LTN 120 or subsequent additions.
- b) Safe access and an acceptable degree of impact on the local highway network.
- c) Provision of safe, direct routes within permeable layouts that facilitate and encourage short distance trips by walking and cycling between home and nearby centres of attraction, and to bus stops or railway stations, to provide real travel

choice for some or all of the journey. Travel routes should link into existing travel networks beyond the development site where possible. The long-term management of the public realm including transport infrastructure must be ensured.

- d) Protection of existing rights of way, cycling and equestrian routes (including both designated and non-designated routes and, where there is evidence of regular public usage, informal provision). If it is demonstrated that the loss of such as route is unavoidable, the development should provide suitable, more appealing or at least equal replacement routes.
- e) Adequate provision to mitigate the likely impacts (including cumulative impacts) of their proposal including environmental impacts (such as noise and pollution) and impact on amenity and health. This will be achieved through direct improvements and Section 106 contributions.

Development proposals should be consistent with other Local Plan policies.

Key Evidence

- Infrastructure Delivery Plan
- Local Cycling and Walking Infrastructure Plan 2021-2031
- Staffordshire Bus Service Improvement Plan 2021
- South Staffordshire Integrated Transport Strategy 2017
- Cycle Infrastructure Design (LTN1/20)

Implementation

Local/national Funding	Development Management	Partners	Section 106 agreement	Supplementary Planning Document
	✓	✓	✓	

Broadband

11.17 The availability of fast and reliable broadband is now an essential component of everyday life and as such will be a requirement for all new residential and commercial development in South Staffordshire. This will allow residents and businesses to have the most up to date speeds, improve commercial opportunities, facilitate working from home and improve residents' connections to essential online services and online social connections.

11.18 The NPPF sets out how Local Plans should support high quality communications including full fibre broadband connections. In the wider national context, Building Digital UK (an executive government agency) is tasked with driving the expansion of

gigabit connectivity to all parts of the country. The council will work with partners including Staffordshire County Council and network providers to promote the roll out of a gigabit-capable broadband (or the next fastest possible) network across the district.

- 11.19 Providing broadband infrastructure at the development stage will ensure that residents and businesses are able to access high speed broadband when they move into new developments. It will also avoid the cost and disruption to future occupiers of retrofitting if the infrastructure is not fit for purpose.

EC13: Broadband

New developments in South Staffordshire District must provide gigabit-capable connectivity through the developer installing full fibre connectivity. If this is not achievable, it must be demonstrated as such through a connectivity statement, in which case the next best alternative technology should be applied. As a minimum the developer should be required to provide appropriate ducting within the highway to facilitate a provider delivering a service at a later date.

Support will be given to proposals which involve community groups or organisations seeking to improve broadband infrastructure within their area.

Development proposals should be consistent with other Local Plan policies.

Key Evidence

- Infrastructure Delivery Plan

Implementation

Local/national Funding	Development Management	Partners	Section 106 agreement	Supplementary Planning Document
✓	✓	✓		

Part E: The natural and built environment

12. Protecting and enhancing the natural environment

Protecting, enhancing and expanding natural assets

- 12.1 The council is committed to supporting and enhancing the quality of the natural environment and the species which it supports. South Staffordshire has a diverse range of biodiversity and geodiversity habitats, including sites and species of national regional and local importance. There are currently 11 Sites of Special Scientific Interest (SSSI) in the district including Motte Meadows, Kinver Edge and Highgate Common. Motte Meadows is also a National Nature Reserve (NNR). Staffordshire County Council have identified a number of Sites of Biological Importance (SBI's) across the district and contain most of the best remaining areas of semi-natural habitat in Staffordshire. There are also 5 Local Nature Reserves (LNR's) in the district including Shoal Hill Common and Wom Brook Walk.
- 12.2 National legislation and policy are promoting an integrated approach to nature conservation to develop a National Recovery Network (NRN) of habitats with the aim of reversing the long-established trends of habitat and species loss. In addition to protecting designated sites, new development will be expected to contribute a biodiversity net gain (Policy NB2) as a means of compensating for losses arising from new development schemes. In addition, the protection and creation of multi-functional Green Infrastructure (Policy HC19) has the potential to support the creation of green linkages to sustain an expanding and robust interconnected network of habitats.

Policy NB1: Protecting, enhancing and expanding natural assets

Support will be given for proposals which protect and enhance the quality of the natural environment. The restoration, enhancement and creation of habitats and ecological connectivity will be supported, particularly where these contribute to the Local Nature Recovery Strategy, the Nature Recovery Network and the conservation of species and habitats of principal importance, as well as those listed on the Staffordshire Biodiversity Action Plan.

When determining planning applications, the council will apply the principles relevant to habitats and species protection as set out in national legislation and policy. Development proposals which are likely to affect any designated site or habitat, species or geological feature must be supported by adequate information to ensure that the impact of the proposal can be fully assessed.

National Site Network (SACs and SPAs) and Ramsar sites

Where a proposed development is likely to have an adverse impact on a site that forms part of the National Sites Network or Ramsar site (either alone or in-

combination with other plans or projects), permissions will not be granted unless there is due compliance with the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended). Where likely significant adverse effects are identified, measures must be put in place to avoid or, if this is not possible, mitigate those impacts. Significant adverse effects that cannot be avoided or adequately mitigated will not be permitted except where there are imperative reasons of overriding public interest. It is the responsibility of the applicant to provide the Local Planning Authority with sufficient information to progress a Habitat Regulations Assessment.

Nationally Designated Sites (SSSI and NNR)

Development proposals which directly or indirectly cause harm to sites of national importance (whether individually or in combination with other developments) will not be permitted. The only exception is where satisfactory mitigation or compensation is provided, and the benefits of the proposed development clearly outweigh both the likely impacts on the features of the site that make it of national importance and any impacts on the wider national network of sites.

Locally Designated Sites (SBIs and LNRs)

Local sites will be safeguarded from development through the use of the mitigation hierarchy with avoidance as the preferred approach. Where impact is unavoidable, developers must provide mitigation or, as a last resort, compensation in the form of replacement habitat in a suitable location to ensure there is a net gain of biodiversity and that the coherence and resilience of any local ecological network is maintained.

Sites that lie outside of a formal designation but which meet the criteria for designation whether that be statutory or non-statutory site designation will be afforded the same protection as if it were to be designated, and applications affecting such sites must assess the site against the Local Wildlife Site Assessment Criteria.

The loss or deterioration of irreplaceable habitats including ancient woodland and ancient or veteran trees will not be acceptable unless there are wholly exceptional reasons, and a suitable compensation strategy is agreed. Areas of very high, high or medium habitat distinctiveness identified in the District's Nature Recovery Network Mapping (or subsequent survey work) and as detailed on the Secretary of State's biodiversity metric should be avoided in the first instance.

Valued soils will be protected and enhanced, including the best and most versatile agricultural land, and development should not contribute to unacceptable levels of soil pollution.

Where there is a confirmed presence or reasonable likelihood of legally protected species, species of principal importance, or species of local conservation concern (i.e. Birds of Conservation Concern, species on the Staffordshire rare plant register, species on the edge of its range, red data book species etc.) and a reasonable

likelihood of the protected species being affected, the developer will be required to undertake appropriate ecological surveys prior to determination.

Where impacts to the species are likely, the developer must demonstrate compliance with the mitigation hierarchy by first avoiding, then mitigating and finally compensating for any adverse effects. All mitigation and/or compensation measures must be detailed in ecological reports submitted with the application.

The developer must demonstrate through submission of documents that where a protected species mitigation licence is required from Natural England, that Natural England would be reasonably likely to grant this, and that the three tests under Regulation 55 sub-paragraphs (2)(e-g), and (9)(a-b) of the Conservation of Habitats and Species Regulations 2017 (as amended) would be met.

Further guidance will be provided in the Natural Environment and Biodiversity SPD.

Development proposals should be consistent with other Local Plan policies.

Key Evidence

- South Staffordshire District Nature Recovery Network Mapping (2020)
- Staffordshire Ecological Records
- Evidence Base relating to Cannock Chase SAC (see policy NB3)
- Habitats Regulations Assessment

Implementation

Local/national Funding	Development Management	Partners	Section 106 agreement	Supplementary Planning Document
	✓	✓	✓	✓

Biodiversity

12.3 The term biodiversity is used to describe the variety of different types of life found on the planet and the variations within species. Biodiversity is fundamentally important to conserve for its own sake and it also offers significant social, environmental and economic benefits which are essential to life as we know it.

12.4 The State of Nature Report published in 2023 describes how the United Kingdom is one of the most nature-depleted countries in the world, experiencing significant loss of biodiversity. Declines have been noted in the abundance of terrestrial and freshwater species by 19% since 1970, invertebrate species have suffered a 13% decline, flowering plants have declined by 54% and bryophytes by 59%. There is

therefore a clear need to respond to these biodiversity declines by ensuring sufficient consideration is given to biodiversity as part of the decision making process.

- 12.5 The Environment Bill received Royal Assent on 9 November 2021 and is now an Act of Parliament. The Act is designed to *‘improve air and water quality, tackle waste, increase recycling, halt the decline of species, and improve our natural environment’*. The Act requires that developments and projects will now need to ensure there is at least a 10% net gain to biodiversity.
- 12.6 Paragraphs 180 – 188 of the NPPF sets out the frameworks approach towards biodiversity and protected habitats.
- 12.7 The South Staffordshire District Nature Recovery Network Mapping was undertaken by Staffordshire Wildlife Trust and published in 2020. It forms a strategic assessment of the district’s biodiversity and habitat networks. The document outlines the existing picture of the district’s nature network and describes key locations where habitats may be created or enhanced to contribute to nature’s recovery.
- 12.8 The Local Nature Recovery Strategy (LNRS) will be informed by the Nature Recovery Network Mapping exercise and will be published by Staffordshire County Council in due course (expected March 2025). This document will provide a strategic view of the importance of various habitat types throughout Staffordshire on a spatial basis, as well as highlighting priorities for nature recovery.
- 12.9 The LNRS will be used to inform the strategic importance of habitats in the Secretary of State’s biodiversity metric, the LNRS is expected to be completed in March 2025. In the interim period between biodiversity net gain becoming mandatory and the LNRS being published, interim guidance on the strategic importance of habitats will be published to ensure applicants apply this metric criterion appropriately.
- 12.10 Applications for development affecting, or with the potential to affect a nationally or locally designated site, legally protected species, species or habitats of principal importance, or other species of conservation concern will need to be accompanied by an ecological impact assessment report. The ecological surveys and reports shall be undertaken in accordance with the most relevant published survey and reporting guidelines for the ecological feature(s) being surveyed or assessed, such as those detailed within Good Practice Guidance for Habitats and Species as issued by the Chartered Institute for Ecology and Environmental Management (or subsequent updated versions), and BS42020:2013 unless otherwise agreed with the district council’s ecologist.

Policy NB2: Biodiversity

All new developments must consider biodiversity as part of any proposal, and professional ecological reports must be provided where impacts to biodiversity are anticipated. Development must demonstrate how the mitigation hierarchy has been

applied to the application by first avoiding impacts, then mitigating impacts which cannot be avoided, and finally by providing proportionate compensation where impacts cannot be avoided or mitigated.

The form and design of development must consider how positive outcomes for biodiversity can be achieved through the creation and/or enhancement of native habitats to maintain and enhance ecological connectivity. The built environment should be viewed as an opportunity to fully integrate biodiversity within new development through innovation. Features including green walls and roofs and sustainable urban drainage systems designed for biodiversity will be supported on new developments where appropriate.

Previously developed land (brownfield sites) will not be considered to be vacant of biodiversity. The reuse of such sites must be undertaken carefully with regard to existing features of biodiversity interest. Development proposals on such sites will be expected to include measures that maintain and enhance important features and appropriately incorporate them within any development of the site.

All new development must also include measures to assist with halting the decline of species and to address biodiversity loss by including site-specific enhancements for species such as bat and bird boxes, hedgehog highways, planting of native floral species, and the inclusion of features beneficial for invertebrates such as sand banks, bee bricks, retaining dead-wood on site, and other beneficial measures.

Biodiversity net-gain

All new development must provide a minimum of 10% biodiversity net gain, measured using the Secretary of State's biodiversity metric or other metric as required for the purposes of measuring biodiversity net gain in the Environment Act 2021. Proposals must meet all of the following criteria:

- a) Delivery of the biodiversity net-gain on-site wherever possible, in a manner consistent with national requirements, ensuring that existing habitats on site are maintained and enhanced as a priority. Where it is demonstrated that this cannot be achieved on site, the required level of off-site biodiversity net-gain must be provided, prioritising biodiversity units near the site, unless doing otherwise would better align with the objectives of the Local Nature Recovery Strategy. As a last resort, statutory biodiversity credits may be acceptable.
- b) Measurement against the latest Natural England Biodiversity Metric. Measurement of biodiversity net gain must be demonstrated through the submission of the Secretary of State's biodiversity metric or other metrics as may be required by subsequent legislative amendments.
- c) Securing of the habitat in perpetuity. Where it is demonstrated that this is not possible, the habitat must be secured for at least 30 years. This will be achieved via a S106 agreement or planning conditions.

Where new habitats are created the council will seek opportunities for habitat creation that mitigates the effect of climate change on species, enhances links between habitats and facilitates the movement of species through the landscape. Consideration must be given to the aims and objectives of the Local Nature Recovery Strategy, and to addressing the decline of both species and habitats.

Further guidance will be provided in the Natural Environment and Biodiversity SPD.

Development proposals should be consistent with other Local Plan policies.

Key Evidence

- The South Staffordshire District Nature Recovery Network Mapping 2020
- Infrastructure Delivery Plan

Implementation

Local/national Funding	Development Management	Partners	Section 106 agreement	Supplementary Planning Document
	✓	✓	✓	✓

Cannock Chase SAC

- 12.13 The main heathland areas of the Cannock Chase Area of Outstanding Natural Beauty (AONB) are designated as a Special Area of Conservation (SAC) and are protected under the European Directive 92/43/EEC (The Habitats Directive). In 2007, a cross boundary partnership comprising statutory bodies with planning and land use responsibilities was formed to oversee work relating to the SAC. The partnership commissioned a number of evidence base studies which highlighted a range of impacts on the SAC arising from high visitor numbers. The studies also indicated that the increase in visitor numbers resulting from proposed new housing growth identified in local plans within a 15km radius of the SAC is likely to have a significant effect unless measures are taken to prevent harm. These impacts include fragmentation of habitat from new paths and tracks, track and path widening through erosion, trampling and compaction and soil enrichment as a consequence of dog fouling. To address these potential impacts the SAC partnership has developed a range of mitigation measures to ensure that new residential development does not adversely affect the Cannock Chase SAC. Funding to support the delivery of these management measures is derived from a per dwelling contribution paid by each net new dwelling built within the Zone of Influence. The Zone of Influence is currently 15km, which is justified by the evidence base. Over the plan period, the evidence base will be continually updated to ensure that the SAC is not being adversely impacted. As

such, the Zone of Influence may change, and the most up to date position can be found in the separate Guidance Note.

- 12.14 The protection afforded to the SAC by international and national directives mean that there is a legal duty on Local Planning Authorities when determining planning applications and producing plans to take account of the potential impacts of any new development on the integrity of the SAC. If any potential negative impacts are identified, the council must either refuse development, or ensure that appropriate mitigation measures are in place to enable the proposed development to proceed.
- 12.15 Further details on the per dwelling financial contribution and the range of proposed mitigation measures are provided in a separate Guidance Note. Governance of the SAC partnership and details of funding arrangements for mitigation measures are outlined in a joint Memorandum of Understanding and associated Financial Agreement. Funds are collected by the member authorities including South Staffordshire and remitted to Stafford Borough Council who act as the financially accountable body.

Policy NB3: Cannock Chase SAC

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. In addition to any other likely significant effects identified all development that leads to a net increase in dwellings within the Zone of Influence around Cannock Chase SAC has the potential to have an adverse impact upon Cannock Chase SAC and must mitigate for such effects. Mitigation can be secured through developer contributions as outlined in the Guidance to Mitigation Note.

The effective avoidance of, and/or mitigation for, any identified adverse effects on the Cannock Chase SAC must be demonstrated to the council as the Competent Authority and Natural England and secured prior to the council giving approval for development. This policy has jurisdiction over developments within South Staffordshire only; however, it will be implemented jointly with neighbouring authorities via the application of complementary policies in partner Local Plans.

Development proposals should be consistent with other Local Plan policies.

Key Evidence

- Planning Evidence Base Review Stage 1 (2017)
- Planning Evidence Base Review Stage 2 (2021)
- Cannock Chase SAC Partnership MOU and Financial Agreement (2022)

Implementation

Local/national Funding	Development Management	Partners	Section 106 agreement	Supplementary Planning Document
	✓	✓	✓	

Landscape Character

- 12.16 The district contains a variety of landscape character areas and designated and undesignated assets that contribute to what the district is today. At a high level the district is split into three broad character areas. The flat or gently undulating, lush, pastoral farmland of the Shropshire and Staffordshire Plain dominates the north-west of the district, with the predominantly rural Mid Severn Sandstone Plateau covering the district’s southern extent. In contrast, the former coalfields and protected heathlands of the Cannock Chase and Cank Wood area cover the district’s north-western extent. Within each of these areas are more localised areas that positively contribute to the district’s landscape character, most notably the Cannock Chase Area of Outstanding Natural Beauty (AONB) in the north-east and the numerous Historic Landscape Areas and pockets of Ancient Woodland scattered throughout the district.
- 12.17 National policy requires all areas to protect and enhance valued landscapes, recognise the intrinsic character and beauty of the countryside and to give significant weight to the protection and enhancement of areas of outstanding natural beauty. Policy NB4 seeks to offer an appropriate response to these issues, providing clarity on how the district will manage development so that it responds positively to the district’s distinctive landscape character, whilst ensuring existing landscape guidance is followed and informs proposals.

Policy NB4: Landscape Character

The intrinsic rural character and local distinctiveness of the South Staffordshire landscape should be maintained and where possible enhanced. Throughout the district, the design and location of new development should take account of the characteristics and sensitivity of the landscape and its surroundings, and not have a detrimental effect on the immediate environment and on any important medium and long-distance views. Proposals must consider the County Council Landscape Character Assessment and Historic Landscape Characterisation in assessing their impacts upon landscape character and should also (where applicable) have regard to the findings of the latest Landscape Sensitivity Study prepared by the council.

All trees, woodland, and hedgerows should be protected and retained. Where any loss of these assets is demonstrably necessary or would facilitate increased biodiversity appropriate mitigation must be delivered by the applicant and appropriate maintenance arrangements established. New and replacement planting should seek to maximise biodiversity in a manner that complements the habitats within and character of the surrounding area.

Proposals within the Historic Landscape Areas (HLA) defined on the Policies Map should have special regard to the desirability of conserving and enhancing the historic landscape character, important landscape features and the setting of the HLA.

All proposals within the Cannock Chase Area of Outstanding Natural Beauty (AONB) and its setting must conserve and enhance the landscape and scenic beauty of the area. In assessing proposals within the AONB or its setting regard must be had to the Cannock Chase AONB Design Guide 2020 and Cannock Chase AONB Views and Setting Guide 2020, or subsequent updates of these documents. Proposals that contribute to the objectives of the Cannock Chase AONB Management Plan, the Forest of Mercia and other local initiatives that will contribute to enhancing landscape character will be supported.

Development proposals should be consistent with other Local Plan policies.

Key Evidence

- Landscape Sensitivity Study 2019
- Planning for Landscape Change - Staffordshire County Council
- Cannock Chase AONB Design Guide 2020
- Cannock Chase AONB Views and Setting Guide 2020
- Cannock Chase AONB Management Plan
- Historic Landscape Characterisation

Implementation

Local/national Funding	Development Management	Partners	Section 106 agreement	Supplementary Planning Document
	✓	✓		

13. Climate change and sustainable development

Renewable and low carbon energy

- 13.1 The council declared a Climate Emergency in 2019, recognising the urgency and scale of the climate crisis. The Local Plan Review needs to play its part in achieving the rapid reductions in greenhouse gas emissions required to provide a liveable future for residents in the district and beyond. Currently Staffordshire’s demand for electricity is around ten times greater than the County’s renewable energy generation capacity, with this gap only set to increase with the increasing reliance on electricity for transport and low carbon heating. Local evidence suggests that bridging this gap will require both decentralised renewable energy generation and large-scale increases in renewable technology, particularly wind and solar energy.
- 13.2 Providing a policy framework for rapid growth in these technologies will be crucial to ensuring that South Staffordshire plays its part in decarbonising the grid by 2035. Policies NB6a, NB6b and NB6c are designed to drive decentralised renewable provision on new development sites. However there has been limited growth in large scale renewable schemes within South Staffordshire during the previous plan period. Specifically, there has been no new large-scale onshore wind schemes consented and limited growth in large scale solar farms. Evidence suggests this needs to be addressed quickly if the government’s ambition to increase growth in onshore wind and solar through the 2020s is to be realised.
- 13.3 To provide a policy framework to deliver growth in renewable energy generation, Policy NB5 indicates support for such schemes within the district. It also provides clear criteria to guide solar and wind schemes to less sensitive areas of the district. These are designed to help balance the rapid growth required in these technologies with the need to protect the amenity of the district’s residents, safeguard its valuable agricultural land resources and address specific issues relevant to wind technologies in particular. It also recognises that many of the opportunity areas for renewable schemes within the district are in the Green Belt, addressing this issue to provide clarity to applicants.

Policy NB5: Renewable and low carbon energy generation

The development of renewable or sustainable energy technologies and complementary infrastructure will be supported throughout the district, subject to conformity with other local plan policies. Such technologies include solar, wind, district heating, hydroelectricity, ground source heat and complementary battery storage schemes. In considering the impacts of a scheme the cumulative impact of the proposed development will be considered along with other planned, committed or completed development.

In addition to conformity with other local plan policies, solar energy proposals and associated infrastructure must also demonstrate that:

- a) The use of agricultural land is necessary and no alternative available and suitable previously developed site within the district can accommodate a scheme of similar scale. The area of search considered should have regard to a viable connection (in distance) to the National Grid;
- b) If (a) is satisfied but the scheme is on Best and Most Versatile Agricultural Land, that there are no alternative sites on lower grade agricultural land that could accommodate the scheme; and
- c) That the proposal has considered opportunities for continued agricultural use (where feasible) and will maximise biodiversity benefits around arrays.

In the case of wind energy proposals, the whole of the district is designated as an area of search suitable in principle for wind energy development. In addition to conformity with other local plan policies, wind proposals must also demonstrate all of the following:

- a) The development does not create a potential hazard to the public, including users of highways, footpaths, bridleways or other public rights of way.
- b) The development does not interfere with telecommunication paths or air traffic services including those associated with the military.
- c) They do not have an overshadowing or overbearing effect on nearby residents.
- d) The development avoids or adequately mitigates shadow, flicker, noise and any other adverse impact on amenity.
- e) Following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed.

Within the district's Green Belt, elements of many renewable energy schemes may comprise inappropriate development and in all such cases schemes must demonstrate very special circumstances in order to be granted permission. Benefits of schemes relevant in considering whether very special circumstances exist may include (but are not limited to) the wider environmental benefits associated with increased production of energy from renewable sources.

Development proposals should be consistent with other Local Plan policies.

Key Evidence

- Staffordshire Climate Change Adaptation & Mitigation - Baseline
- Staffordshire Climate Change Adaptation & Mitigation - Final Report

Implementation

Local/national Funding	Partnerships	Section 106/278	Development Management	Supplementary Planning Document
	✓		✓	

Sustainable Construction

Addressing the Climate Emergency – new development

- 13.4 Emissions from buildings are the district’s biggest source of emissions aside from surface transport. New development needs to avoid worsening this issue and can play a part in encouraging widespread use of the technologies needed to decarbonise the wider built stock in the district. The Local Plan Review anticipates significant residential and employment growth, and it is important that emissions associated with the energy needs and construction of this growth are minimised as far and as quickly as possible.
- 13.5 It is also vital that decentralised renewable energy generation is delivered wherever possible and that increased monitoring of new development occurs to ensure that ‘as built’ outcomes match those proposed at the design stage. If these issues aren’t addressed, the district will fail to play its part in decarbonising Staffordshire’s energy demands and there will continue to be a performance gap in building standards. The district is in an area of serious water stress, and the effects of climate change will only serve to worsen this issue in future.
- 13.6 To address these issues the suite of policies draws on existing national assessment frameworks to set carbon reduction targets for energy use in both residential and non-residential developments, whilst increasing monitoring of ‘as built’ outcomes to offer greater assurance that the required reductions are actually achieved on the ground. It also requires larger developments to robustly assess and seek opportunities to reduce their embodied carbon footprint.

New build residential development

Policy NB6A: Net zero new build residential development (operational energy)

A1. Overarching carbon reduction

New residential development of 1 or more homes shall achieve **net zero regulated and unregulated carbon emissions**, through the application of requirements A2 – A4 laid out below.

Regulated carbon emissions should be calculated with **SAP10.2 or any more recent replacement methodology**

The **regulated carbon reduction should be achieved through on-site measures**, unless this is demonstrated to the council's satisfaction that it is unviable or unfeasible with reference to site-specific factors.

A2. Energy efficiency

A 63% reduction on the Part L 2021 TER (regulated carbon emissions), is to be achieved through energy efficiency features.

Alternatively, where Passivhaus certification is proposed (or a space heat demand of $\leq 20\text{kWh/m}^2/\text{year}$ and a total energy use intensity of $\leq 45\text{kWh/m}^2/\text{year}$) and the proposal is fossil fuel free, the applicant will not need to submit SAP calculations. In that case the applicant's Energy Statement should instead cite their PHPP calculations, and a condition will be set requiring evidence of fulfilment on completion.

A3. Renewable energy supply

Subsequent to point A2, a **further reduction to net zero regulated carbon emissions is to be achieved through on-site renewable energy generation** and/or connection to a certified renewable or low-carbon (fossil-free) local energy network.

Where it is proven unfeasible or unviable to include enough on-site renewable energy to achieve a 100% reduction in TER in this way, and this can be demonstrated to the council's satisfaction with reference to site-specific factors, the applicant will first demonstrate inclusion of as much renewable energy as feasible and viable, then address the remaining regulated carbon emissions by offsetting as per point A4.

Large-scale development (50 residential units or more) should demonstrate that opportunities for on-site renewable energy infrastructure (on-site but not on or attached to individual dwellings), such as solar PV canopies on car parks, have been explored.

Proposals are encouraged to demonstrate that the amount of on-site renewable energy generation equates to $\geq 120\text{kWh/m}^2$ projected building footprint/year.

A4. Offsetting

Only in exceptional circumstances and as a last resort where it is demonstrably unfeasible to achieve the requirements of A3 above, any residual carbon emissions from regulated and unregulated energy are to be offset via a **Section 106 financial contribution reflecting 30 years of the building's operation.**

A5. Reduced performance gap

Applicants are encouraged to submit, alongside their SAP figures, a set of total energy performance predictive calculations using Passivhaus Planning Package (PHPP), CIBSE

TM54, or other method demonstrably proven to produce accurate predictions of total in-use energy.

An assured performance method must be implemented throughout all phases of construction to ensure operational energy in practice performs to predicted levels at the design stage.

A6. Smart energy systems

Proposals should demonstrate how they have considered the difference (in scale and time) of renewable energy generation and the on-site energy demand, with a view to maximising on-site consumption of energy generated on site and minimising the need for wider grid infrastructure reinforcement.

Where the on-site renewable energy generation peak is not expected to coincide with sufficient energy demand, resulting in a need to export or waste significant amounts of energy, proposals should demonstrate how they have explored scope for (and where appropriate implemented) energy storage and/or smart distribution systems.

A7. Post-occupancy evaluation

Large-scale development (over 50 homes) should monitor and report total energy use and renewable energy generation values on an annual basis for 5 years from first occupation. An outline plan for the implementation of this should be submitted with the application. Monitored data are to be reported to the local planning authority.

Development proposals should be consistent with other Local Plan policies.

- 13.7 Policy NB6A sets out the requirements for new homes' carbon performance with seven different policy elements (A1-A7) to be addressed. A1 – A7 are to be demonstrated at the planning application stage through the submission of an energy statement (or sufficiently detailed energy chapter within a wider sustainability statement), alongside associated output reports from energy modelling software. Policy elements A1, A2 and A3 are to be addressed at design and post-completion stages, to ensure that the development has been built to the intended standards. Post-completion resubmission of the original energy statement including energy performance calculations, informed by the relevant tests to systems and fabric, should be required as a condition as part of the planning application process. A5 and A7 compliance should also be demonstrated post-completion through planning condition.
- 13.8 As part of the requirement under A1 for a calculation of regulated carbon emissions, these calculations must reflect the same specification and performance that are submitted for Building Control. Unregulated energy use should be calculated using either SAP Appendix L, BREDEM, TM54, PHPP or any accurate predictive energy model, and shall be converted using SAP carbon factors.

- 13.9 When considering the energy efficiency requirements under A2, 'Energy efficiency' includes any feature that reduces the energy demand of a building compared to the equivalent feature specified in the Part L notional dwelling, regardless of whether the energy supply is conventional or renewable. This includes not only fabric, lighting, other efficient equipment and heat-recovery, but also heat pumps or any other heating system more efficient than the notional building heating system specified in Part L. Renewable energy generation is not an energy efficiency feature.
- 13.10 Policy element A3 sets out that subsequent to energy efficiency measures under A2, further reduction to net zero emissions is to be achieved through renewable energy generation. Where the applicant seeks flexibility in policy compliance on the basis of feasibility or viability, this claim will need to be demonstrated to the satisfaction of the council with reference to site-specific and use-specific factors, and, if the council deems it necessary, an open-book viability/cost assessment. Where a building in a multi-building development cannot individually achieve the requirements of A3, this shortfall is to be made up across other units on-site before offsetting (A4) is considered.
- 13.11 Where offsetting is required, the Section 106 financial contribution should reflect 30 years of the building operation. The price per tonne of carbon will be £256 or the latest year's central value set by the Treasury Green Book Valuation of Energy and Carbon at the time of application, whichever is higher. The calculation can include the nationally projected electrical grid decarbonisation across that 30-year period from the date of application. Grid decarbonisation figures are to reflect those found in the Treasury Green Book or future national equivalent. Carbon offsetting projects delivered through this policy could include but are not limited to: offsite renewable energy generation; retrofitting in existing buildings; large-scale tree planting. Projects will be delivered within South Staffordshire wherever possible but could include neighbouring authorities and cross-border initiatives where there is a benefit to doing so (e.g. deliverability; economies of scale; social benefits). The council will prepare and maintain supplementary planning guidance setting out how contributions to the Carbon Offset Fund will be utilised to enable net-zero carbon, and how the council's discretion will be exercised with regards to assessing the acceptability of any alternative off-site offsetting solutions that may be proposed by developers. This will include a list of projects to be funded and regularly reviewed in line with the council's Climate Emergency Action Programme to ensure that there is transparency throughout the process.
- 13.12 Under policy element A6, Smart energy systems may include any combination of smart local grids, energy sharing, energy storage, demand-side response. The purpose is to optimise on-site or local consumption of the renewable energy that is generated by the site. Where appropriate, proposals should demonstrate that they have integrated such smart energy system features to optimise these carbon- and energy-saving benefits and minimise the need for grid reinforcements.

New build non-residential development

Policy NB6B: New build non-residential development (operational energy)

B1. BREEAM

Major non-residential development is to **demonstrate compliance with the most recent applicable BREEAM Excellent standard**. BREEAM Outstanding should be targeted and the proposal will be afforded weight in favour where this is achieved. Maximum credits under BREEAM criteria Ene01 should be achieved.

B2. Energy efficiency

New non-residential development proposals are expected to achieve a **15% improvement in Part L 2021 TER through energy efficiency features** unless demonstrated unfeasible or unviable to the satisfaction of the council with references to site-specific and/or use-class specific characteristics. Where this target is not met, applications must demonstrate that energy efficiency measures (and TER reductions from these) have been pursued to the greatest extent feasible and viable, in comparison to the notional standards set by Building Regulations Part L. This is to be demonstrated using the latest non-residential National Calculation Methodology (currently SBEM).

Additionally, proposals are **encouraged** to meet the following targets:

- Warehouses: ≤ 35 kWh/m²/year total energy use
- Offices: ≤ 55 kWh/m²/year total energy use
- Schools: ≤ 55 kWh/m²/year total energy use
- Retail: ≤ 35 kWh/m²/year total energy use
- Other building types: 30 kWh/m²/year regulated energy uses
- All typologies: Space heat demand: ≤ 15 kWh/m²/year.

Where accurate energy modelling (PHPP, CIBSE TM54 or equivalent subject to council approval) demonstrates that the proposal will achieve the relevant one of the above optional targets or Passivhaus certification, this benefit will be afforded weight in favour of the proposal and it will not be necessary to also submit evidence of the 15% TER reduction cited above.

B3. On-site renewable energy

Non-residential development must **demonstrate the fullest feasible and viable use of on-site renewable energy generation and/or connection** to local renewable and low carbon energy network, with the aim to annually match operational energy use. All non-residential buildings are **encouraged** to demonstrate that the amount of on-site renewable energy generation equates to ≥ 120 kWh/m² projected building footprint/year. Where this is fulfilled, the sustainability benefit of this will be recognised and afforded weight in favour of the proposal. Large-scale development

(5000m² non-residential floorspace or more) should demonstrate that opportunities for on-site renewable energy infrastructure (on-site but not on or attached to individual buildings), such as solar PV canopies on car parks, have been explored. In new developments, the use of fossil fuels and connection to the gas grid will not be considered acceptable.

B4. Reduced performance gap

Proposals are encouraged to take the following steps, and planning decisions will recognise the sustainability benefits where these are demonstrated to have been fulfilled:

- Produce accurate energy use predictions using Passivhaus Planning Package, CIBSE TM54, or other method demonstrably proven to produce accurate predictions of total in-use energy (subject to local authority approval of the method).
- Implement an assured performance process throughout design and construction to ensure operational energy in practice performs to predicted levels at the design stage.

B5. Smart energy systems

Proposals should demonstrate how they have considered the difference (in scale and time) of renewable energy generation and the on-site energy demand, with a view to maximising on-site consumption of energy generated on site and minimising the need for wider grid infrastructure reinforcement.

Where the on-site renewable energy generation peak is not expected to coincide with sufficient energy demand, resulting in a need to export or waste significant amounts of energy, proposals should demonstrate how they have explored scope for (and where appropriate implemented) energy storage and/or smart distribution systems.

B6. Post-occupancy evaluation

Large-scale development (5,000m² floor space or more) should monitor and report total energy use and renewable energy generation values on an annual basis for 5 years from first occupation. An outline plan for the implementation of this should be submitted with the application. Monitored data are to be reported to the local planning authority.

Development proposals should be consistent with other Local Plan policies.

- 13.13 The principal requirement on Policy NB6B is for non-residential development to achieve BREEAM Excellent certification which is something that many existing non-residential developments in the district are already achieving. To achieve BREEAM

Excellent and maximise credits under BREEAM criteria Ene01: reduction of energy use and carbon emissions, will likely be achieved through energy efficiency measures. As such, these measures will contribute towards meeting both policy elements B1 and B2. Further measures set out in the policy mirror those requirements for residential developments including maximising opportunities for energy generation and energy storage and/or smart distribution systems.

- 13.14 B1 – B6 are to be demonstrated at the planning application stage through the submission of an energy statement (or suitably detailed energy chapter within a wider sustainability statement), alongside associated output reports from the relevant energy modelling software in the case of B2-B3. Policy element B1 – B4 are to be addressed at design and post-completion stages, to ensure that the development has been built to intended standards. Post-completion resubmission of the original energy statement including energy performance calculations, informed by the relevant tests to systems and fabric, should be required as a condition as part of the planning application process. B5 and B6 compliance should also be demonstrated post-completion as a planning condition.

Embodied Carbon

Policy NB6C: Embodied carbon and waste

C1. Embodied carbon reporting

All new residential and non-residential developments are encouraged to complete a whole-life carbon assessment in accordance with RICS Whole Life Carbon Assessment guidance.

C2. Limiting embodied carbon

Large-scale new residential (50 and above units) and non-residential (5000m² commercial floorspace) development to limit embodied carbon (RICS modules A1 – A5) to 550 kgCO₂/m² GIA.

C3. Building end-of-life

All new buildings are to be designed to enable easy material re-use and disassembly, subsequently reducing the need for end-of-life demolition.

C4. Demolition audits

All major development that contains existing buildings/structures to carry out a pre-redevelopment and/or pre-demolition audit, following a well-established industry best practice method (e.g. BRE).

Development proposals should be consistent with other Local Plan policies.

- 13.15 The approach to assessing and limiting carbon in Policy NB6C recognises that embodied emissions are as significant a source of emissions as a building’s energy needs. Information demonstrating compliance with C2 is to be submitted at the planning application stage and post-completion stage (submitted as a planning condition) to verify that as-built embodied carbon quantities remain compliant. Compliance with C1, C2 and C3 are to be demonstrated within an energy statement. If applicable, output reports for C4 should be submitted alongside an energy statement.
- 13.16 Further guidance on how to achieve compliance with this policy and the operation of any carbon offsetting fund will be set out in a Sustainable Construction and Climate Change SPD.

Key Evidence

- Staffordshire Climate Change Adaptation & Mitigation - Baseline
- Staffordshire Climate Change Adaptation & Mitigation - Final Report
- Water Cycle Study 2020
- Sustainable Construction Policy NB6 review (2023)
- Sustainable Construction Policy NB6 review - addendum (2024)

Implementation

Local/national Funding	Partnerships	Section 106/278	Development Management	Supplementary Planning Document
	✓	✓	✓	✓

Managing flood risk, sustainable drainage systems & water quality

- 13.17 The Environment Agency retains a strategic overview of flood risk management relating to main rivers and is a statutory consultee for development within Floodzones 2 and 3 as well as development within the riverbed or within 20m of a main river.
- 13.18 Flood risk arises from several sources; River Flooding (fluvial), Surface Water, groundwater, sewers and where ordinary watercourses become overwhelmed. These sources have been examined in the Strategic Flood Risk Assessment (SFRA) which informs this plan. Developers should refer to the SFRA when preparing proposals and their approach should reflect and take into account its contents.
- 13.19 The NPPF requires the Local Plan to reduce and manage flood risk by firstly assessing that risk and applying the sequential test, to allocating or developing land to avoid locating development in areas of higher risk and where that is not possible managing and mitigating that risk taking into account the vulnerability of site users.

- 13.20 Any proposed development within 8m of a main river watercourse will require an environmental permit from the Environment Agency, and any development that could impact the flow within an ordinary watercourse will require consent from Staffordshire County Council as Lead Local Flood Authority (LLFA).
- 13.21 Sustainable Drainage Systems (SuDS) are designed to reduce the potential impact of surface water drainage discharges from both new and existing developments. SuDS aim to replicate natural systems of surface water runoff through collection, storage and cleaning before releasing water slowly and reducing the possible risk of flooding. Existing conventional drainage systems can bring about rapid runoff which may result in flooding, pollution and potential contamination of groundwater sources. Climate change is expected to result in more episodes of shorter rainfall duration and greater water volume for which some existing infrastructure is likely to be inadequate. Examples of the type of system that can be provided for large-scale developments are reed beds and other wetland habitats that collect, store and improve water quality along with providing a habitat for wildlife. For smaller developments SuDS might include green roofs or rainwater harvesting techniques.
- 13.22 SuDS potentially have such an important influence on the layout of new development schemes that early engagement with the LLFA, Local Planning Authority and other relevant authorities are considered crucial to their success.
- 13.23 In the site-by-site consideration of land that can be counted towards open space, quite often SuDS features e.g. ditches or steep sided open water retention ponds, cannot be included as being useable open space for public use. Where for example, such features have steep sides, or are likely to be soggy on a regular basis or for long time periods their function as public open space may be compromised. There may be instances where public use of open spaces would harm the effective functioning of the SuDS and where maintenance requirements would necessitate a lack of public access e.g. land being fenced off, it should not be classed as public open space. Where there is a clear conflict between both roles, SuDS should not be counted as open space provision.
- 13.24 The protection of groundwater is one of the important considerations in dealing with contaminated sites. The Local Planning Authority have a duty to maintain and protect the quality and quantity of groundwater resources for current and future abstraction, for dependent ecosystems and indirect uses.

Policy NB7: Managing flood risk, Sustainable urban Drainage Systems (SuDS) & water quality

1. Managing flood risk

New development shall be located on Flood Zone 1 or areas with the lowest probability of flooding, taking climate change into account, and will not increase flood risk elsewhere. Any proposals for new development (except water compatible uses)

within Flood Zones 2 and 3 will be required to provide sufficient evidence for the council to assess whether the requirements of the sequential test and exception test have been satisfied, taking climate change into account. Where development meets the sequential test in an area of higher flood risk, it must be designed to be flood resilient and safe for its users for the lifetime of the development, taking climate change and the vulnerability of any residents or users into account.

For developments within Flood Zones 2 and 3, and for developments elsewhere involving sites of 1ha or more, development proposals must be accompanied by a site-specific Flood Risk Assessment which meets the requirements of the NPPF and Planning Practice Guidance. Flood Risk Assessments submitted must take into account an assessment of flood risk across the life of the development taking climate change into account in accordance with the latest Environment Agency guidance.

All more Vulnerable and Highly Vulnerable development within Flood Zone 2 and 3 should set finished floor levels 600mm above the known or modelled at 1% and 3.3% annual exceedance probability (AEP) flood level, including an allowance for climate change in accordance with the latest National guidance. All new development in Flood Zones 2 and 3 should not adversely affect flood routing or result in a net loss of flood storage capacity that would increase flood risk elsewhere.

For developments located in areas at risk of fluvial flooding, safe access/egress must be provided in the form of a safe dry route for people as a minimum and vehicles wherever possible.

Developments should, where possible naturalise urban watercourses (by reinstating a natural, sinuous river channel and restoring the functional floodplain) and open up underground culverts, to provide biodiversity net gain as well as amenity improvements. Development should not take place over or within 8m of culverted watercourses.

Where it is not always possible to direct development to sites with the lowest probability of flooding, the development should seek to minimise risk to the site and make the development resistant to any residual risk and make the development flood resilient. Opportunities should also be sought to reduce the overall level of flood risk through the layout and form of development. Development should be designed to be safe throughout its lifetime, taking account of the potential impacts of climate change. Provision for emergency access and egress must also be included.

All developments should seek to provide wider betterment by demonstrating in site-specific flood risk assessments and surface water drainage strategies (where required) what measures can be put in place to contribute to a reduction in overall flood risk downstream. This may be by provision of additional storage on site e.g. through oversized SuDS, natural flood management techniques, green infrastructure and green-blue corridors and / or by providing a partnership funding contribution towards wider community schemes. The developer should consult with the relevant authority at the earliest opportunity

For all developments (excluding minor developments and change of use) proposed in Flood Zone 2 or 3, a Flood Warning and Evacuation Plan should be prepared.

Where the development site would benefit from the construction of Flood Management Infrastructure such as Flood Alleviation Schemes, appropriate financial contributions will be sought.

2. Sustainable urban Drainage Systems (SuDS)

All new major development or developments involving large areas of hard standing (e.g. car parks) will incorporate SuDS appropriate to the nature of the site. Such systems shall provide optimum water runoff rates and volumes taking into account relevant local or national standards and the impact of the Water Framework Directive on flood risk issues, unless it can be clearly demonstrated that they are impracticable.

Sustainable drainage systems will be expected to reflect the design requirements and drainage hierarchy set out in the Staffordshire County Council Sustainable Drainage Systems (SuDS) Handbook - February 2017, or subsequent updates.

SuDS design should be an integral part of the design and clear details of proposed SuDS together with how they will be managed and maintained will be required as part of any planning application.

Only proposals which clearly demonstrate that a satisfactory SuDS layout with appropriate maintenance is possible, or compelling justification as to why SuDS should not be incorporated into a scheme, or are unviable, are likely to be successful. SuDS systems should be designed to ensure that it can be accessed for maintenance and operation requirements and that ongoing maintenance costs are economically proportionate.

The dual use of land for SuDS and Open Space can be supported where neither use is compromised by the other. It may be supported in circumstances where land is safely usable by the public as open space and where SuDS will contribute towards an attractive and well landscaped environment where use as open space does not compromise the efficient and effective functioning of the SuDS in the short or longer term.

Discharge should not be made into the combined sewer system and early engagement by the developer with Severn Trent Water Ltd will be required to ensure sustainably drained development.

3. Water quality

Development should not adversely affect the quality or quantity of water, either directly through pollution of surface or ground water, or indirectly through the treatments of wastewater.

In order to protect and enhance water quality, all development proposals must demonstrate all of the following:

- a) There are adequate water supply, sewerage and land drainage systems (including water sources, water and wastewater infrastructure) to serve the whole development, or an agreement with the relevant service provider to ensure the provision of the necessary infrastructure prior to the occupation of the development. Where development is being phased, each phase must demonstrate sufficient water supply and wastewater conveyance, treatment and discharge capacity.
- b) The quality of ground, surface or water bodies will not be harmed, and opportunities have been explored and taken for improvements to water quality, including denaturalisation of river morphology, and ecology.
- c) Appropriate consideration is given to sources of pollution, and appropriate SuDS measures incorporated to protect water quality from polluted surface water runoff.

Foul drainage to a public sewer should be provided wherever possible, but where it is demonstrated that it is not feasible, alternative facilities must not pose unacceptable risk to water quality or quantity.

Development proposals should be consistent with other Local Plan policies.

Key Evidence

- Strategic Flood Risk Assessment Level 1
- Strategic Flood Risk Assessment Level 2

Implementation

Local/national Funding	Development Management	Partners	Section 106 agreement	Supplementary Planning Document
	✓	✓	✓	

14. Enhancing the historic environment

Protection and enhancement of the historic environment and heritage assets

- 14.1 South Staffordshire’s historic environment is a rich and varied, finite and vulnerable resource. Heritage assets are defined as a building, monument, site, place, area, or landscape identified as having a degree of significance meriting consideration in planning decisions because of its heritage interest. Reference to heritage assets includes both designated and non-designated assets. The inevitable and continuous process of change and development create pressures on this resource and a policy response is required to ensure its continued conservation.
- 14.2 National planning policy seeks to promote a positive approach towards the conservation and enjoyment of the historic environment. There is a focus on the conservation of heritage assets in a manner which is appropriate to their significance with a view to ensuring their continuing enjoyment for existing and future generations. In planning for new development, the NPPF identifies the need to consider the potential interaction between new development and the historic environment, and the ability of the new to take influences from and contribute to the existing character of an area.
- 14.3 A Conservation Area Management Plan has been published for the majority of Conservation Areas in the district. These plans provide valuable guidance on matters such as structures and views of importance and should be treated as a material planning consideration when determining planning applications. The council has also produced a local list of locally significant buildings and structures which will also be taken into account when assessing development proposals.
- 14.4 Where a heritage statement is required, this should be: proportionate; include a description of the significance of the affected asset(s); assess the impact of the proposed development; indicate how the proposal would conserve or enhance the asset(s) and indicate how development proposals have sought to avoid, minimise or mitigate any harm to the asset(s) significance. Consideration should be given to the asset(s) setting where that setting is part of an asset(s) significance. It is expected that heritage statements are prepared by a qualified profession using information from the Historic Environment Record (HER).

Policy NB8: Protection and enhancement of the historic environment and heritage assets

The historic environment will be conserved and enhanced, and heritage assets will be protected in a manner appropriate to their significance. Development proposals should demonstrate how they conserve or enhance the character, appearance and

function of heritage assets and their settings and respect the significance of the historic environment.

Development proposals should seek to avoid, and then minimise harm to heritage assets in the first instance. Development proposals which would cause harm to the significance of a heritage asset, or its setting, will not be permitted without a clear justification in accordance with legislation and national policy.

Proposals which could impact on the significance of a heritage asset, including its setting, should be accompanied by a heritage statement which is proportionate to the importance of the asset and its setting.

Where there is the potential for areas of archaeological interest to be affected, an archaeological assessment should be prepared by a suitably qualified professional and informed by available evidence including desk-based assessments and where appropriate field evaluation to establish the significance of known or potential heritage assets.

The loss of heritage assets will be resisted. Where this is not possible, development consent which would result in the loss of all, or part of, the significance of a heritage asset, a historic building record and/or archaeological excavation will be required. Results should be published and made publicly available and added onto the Historic Environment Record.

The council will support measures which secure the improved maintenance, management and sustainable reuse of heritage assets (where appropriate), particularly those which are identified nationally or locally as being at risk.

Development proposals should be consistent with other Local Plan policies.

Key Evidence

- Conservation Area Appraisals and Management Plans 2010
- Buildings of Special Local Interest
- Historic Environment Site Assessment 2022
- Historic Environment Character Assessment 2011
- West Midlands Farmsteads and Landscape Project 2010

Implementation

Local/national Funding	Development Management	Partners	Section 106 agreement	Supplementary Planning Document
	✓			

Canal Network

- 14.5 The council will continue to work with the Canal and River Trust and other partners to safeguard and enhance the canal network in the district. Sensitive development which respects the heritage value of the network and offer the opportunity for enhancing the tourism, leisure, recreation and cultural value will be supported. Any development should be located within close proximity to existing settlements particularly where this can support rural services and act as a catalyst to assist rural regeneration. The role of the canal network as a key element of the green/blue infrastructure network will be supported. This has the potential to deliver multiple benefits including support for active travel, tourism and leisure opportunities and linkages into a network of wildlife corridors and stepping stones which can support the restoration and preservation of biodiversity.
- 14.6 The canals within the district are protected as designated heritage assets (canal conservation areas) and a significant number of the associated canal structures such as bridges are nationally listed. National policy identifies such assets as an irreplaceable resource and promotes their conservation in a manner appropriate to their significance.
- 14.7 The restoration of the Hatherton Branch Canal is being promoted by the Lichfield and Hatherton Canals Restoration Trust. The aim is to restore the route from Hatherton Junction at Calf Heath to connect through the disused Lord Hayes Branch with the Wyrley and Essington Canal on the Birmingham Canal Navigations network. The project is in various phases of restoration, however in the absence of the full canal route being completely restored, the intention is to safeguard the route and implement it in sections as green infrastructure and a public walkway, known as the Heritage Towpath Trail.

Policy NB9: Canal Network

The development of new, or the expansion of existing, canal side facilities such as mooring, service facilities and marinas should be located within or in close proximity to existing settlements. Developers will be required to demonstrate their commitment to integrating proposals within the local community to become part of the ‘public realm’ of the settlement.

Proposals will be supported where they meet all of the following criteria:

- a) Conserve and enhance the heritage, scenic and wildlife value of canals.
- b) Are sensitively designed and enhance the setting of the waterways particularly in relation to scale, layout, character, massing, form, materials and landscaping.
- c) Enhance the recreation and tourism value of the canal network.

d) Contribute positively to the function and appearance of canals, and wherever possible provide new life for redundant buildings.

The recreational value of canals for walking cycling and canoeing will be encouraged and promoted for their contribution to the health and wellbeing of residents and visitors. Opportunities will be sought to improve the accessibility of the canal network through the provision of improved surfacing, access points and wayfinding as a recognition of their important role as a key element of the green/blue infrastructure network.

Proposals for the environmental improvement and restoration of canals, including the Hatherton Branch Canal (either fully or as a Heritage Towpath Trail), will be supported having regard to the benefits to the canal system and rural regeneration provided there will be no adverse impact on the natural and historic environment including designated sites and habitats. Prior to any canal being restored to a navigable condition, evidence will need to be provided to the Environment Agency to demonstrate that the abstraction of water to feed the canal is sustainable.

The route of the Hatherton Canal as shown on the Policies Map will be safeguarded from any development which would prejudice the restoration of the canal.

Development proposals should be consistent with other Local Plan policies.

Key Evidence

- Canal and Rivers Trust Planning Policy Advice Note
- Hatherton Canal Restoration Feasibility Report 2006
- Hatherton Canal Restoration Supplementary Feasibility Report 2009

Implementation

Local/national Funding	Development Management	Partners	Section 106 agreement	Supplementary Planning Document
	✓	✓		

Part F: Monitoring

15. Monitoring the plan

- 15.1 Having set out a clear direction for how the district will develop over the next 15 years, after the Local Plan is adopted, it is important that the implementation of policies is monitored to ensure they remain applicable and practical over time. Furthermore, the planning system continues to place great importance on the process of monitoring Local Plan performance in order to identify a need for plan review. Therefore, the council will measure this plan performance each year through the monitoring framework and the identified targets therein, by monitoring planning applications to assess the delivery of the Local Plan.
- 15.2 The main mechanism for reporting this will be via the Authority Monitoring Report (AMR) published annually. The council will prepare this which will contain an assessment of progress against identified milestones, the extent to which objectives are being achieved, and targets are being met. Appendix J identifies a range of monitoring requirements, targets and objectives linked to the Local Plan policies. These assessments, through the AMR, will test the delivery and performance of the Local Plan and supporting documents. As such, the Monitoring Framework will play an integral role in providing an understanding of whether a review of the plan is needed. Should the monitoring data indicate that objectives or targets are not being met, policies are not performing as intended, or circumstances have changed locally and/or nationally, this may give rise to a review of the local plan either in part or in full. To facilitate this, it is considered that the best approach is to use the Strategic Objectives as a structure, and – where it is appropriate – monitor the strategic policies within those to provide a more granular basis of measurement.
- 15.3 The Monitoring Framework has been appended to the Local Plan to reflect the fact it is a ‘living document’. Many of the Local Plan policies will require assessment over time to understand appropriate trends and impacts on development. This reflects the changing nature of planning policy, and the increasing need to consider the impacts of climate change and sustainable development in particular. Therefore, the Monitoring Framework will be regularly reviewed and kept up to date through the AMR process. At this moment in time, the framework contains a series of performance indicators that are reflective, and will measure the success of, the strategic objectives and the effectiveness of policies in the Local Plan. This will form the basis of the AMR in future. It is also recognised that the assistance of various implementation agencies and partner organisations that will be involved in implementing the policies and the proposals in the plan will be important in collecting data and measuring performance.

Appendix A

Key evidence base and topic papers

Housing

- Housing and Homelessness Strategy 2023-2027 (2022)
- Greater Birmingham and Black Country Housing Market Area Strategic Growth Study (2018)
- Strategic Housing and Economic Land Availability Assessment (SHELAA)
- Housing Market Assessment - Update (2022)
- Housing Market Assessment Partial Update (2024)
- Housing Site Selection Topic Paper (2024)
- Homes for Older and Disabled People Topic Paper (2024)
- Housing Density Topic Paper (2024)
- Affordable Housing and Housing Mix Topic Paper (2024)
- Internal Space Standards Topic Paper (2024)
- Gypsy and Traveller Accommodation Assessment – update (2024)
- Gypsy and Traveller Accommodation Assessment (2021)
- Gypsy and Travellers: Pitch Deliverability Study (2021)
- Gypsy and Traveller Site Assessment: Staffordshire County Council owned land (2022)
- Gypsies, travellers and travelling showpeople Topic Paper (2024)

Economic

- Stoke on Trent and Staffordshire LEP Strategic Economic Plan (2018)
- Economic Development Needs Assessment – update (2024)
- Economic Development Needs Assessment (2022)
- EDNA Part 2; Economic Land Availability Assessment (2020)
- West Midlands Strategic Rail Freight Interchange – Employment Issues Response Paper – Labour Supply (2020)
- West Midlands Strategic Rail Freight Interchange – Employment Issues Response Paper - Whose need will the SRFI serve? (2021)
- West Midlands Strategic Employment Sites Study (2021)
- Economic Strategy and Employment Site Assessment Topic Paper (2024)
- Retail Centres Study (2021)

Environmental/Sustainability

- Sustainability Appraisal
- Rural Services and Facilities Audit (2021)

- Habitats Regulation Assessment
- Black Country and South Staffordshire Green Belt Study (2019)
- South Staffordshire Green Belt Study Addendum (2022)
- Green Belt Exceptional Circumstances Topic Paper (2024)
- Black Country and South Staffordshire Landscape Sensitivity Study (2019)
- South Staffordshire Landscape Sensitivity Study Addendum (2022)
- Staffordshire Climate Change and Adaptation and Mitigation Study (2020)
- Sustainable Construction Policy NB6 review (2023)
- Sustainable Construction Policy NB6 review - addendum (2024)
- South Staffordshire Nature Recovery Network Mapping (2020)
- Strategic Flood Risk Assessment – Level 1 (2019)
- Strategic Flood Risk Assessment – Level 2 (2022)
- Water Cycle Study (2020)

Historic Environment

- Historic Environment Site Assessment – stage 1 (2020)
- Historic Environment Site Assessment – stage 2 (2022)
- Historic Environment Site Assessment – stage 1 addendum (2023)
- Conservation Area Appraisals and Management Plans

Infrastructure

- Infrastructure Delivery Plan (IDP)
- Open Space Assessment and Standards Paper (2019)
- Local Green Spaces Topic Paper (2022)
- Indoor Sports Needs Assessment and Strategy (2020)
- Playing Pitch Needs Assessment and Strategy (2020)
- Playing Pitch Requirements Topic Paper (2022)
- Local Plan Viability Study – stage 1 report (2021)
- Local Plan Viability Study – stage 2 report (2022)
- Local Plan Viability Study (update report) (2024)
- Strategic Transport Assessment (2022) – prepared by site promoters of strategic sites
- Staffordshire County Council representation to Preferred Options consultation (2021) (includes highways modelling evidence)
- Staffordshire County Council Active Travel recommendations
- Local Cycling and Walking Infrastructure Plan 2021-2031
- Staffordshire Bus Service Improvement Plan (2021)
- South Staffordshire Integrated Transport Strategy (2024)
- Cycle Infrastructure Design (LTN1/20)

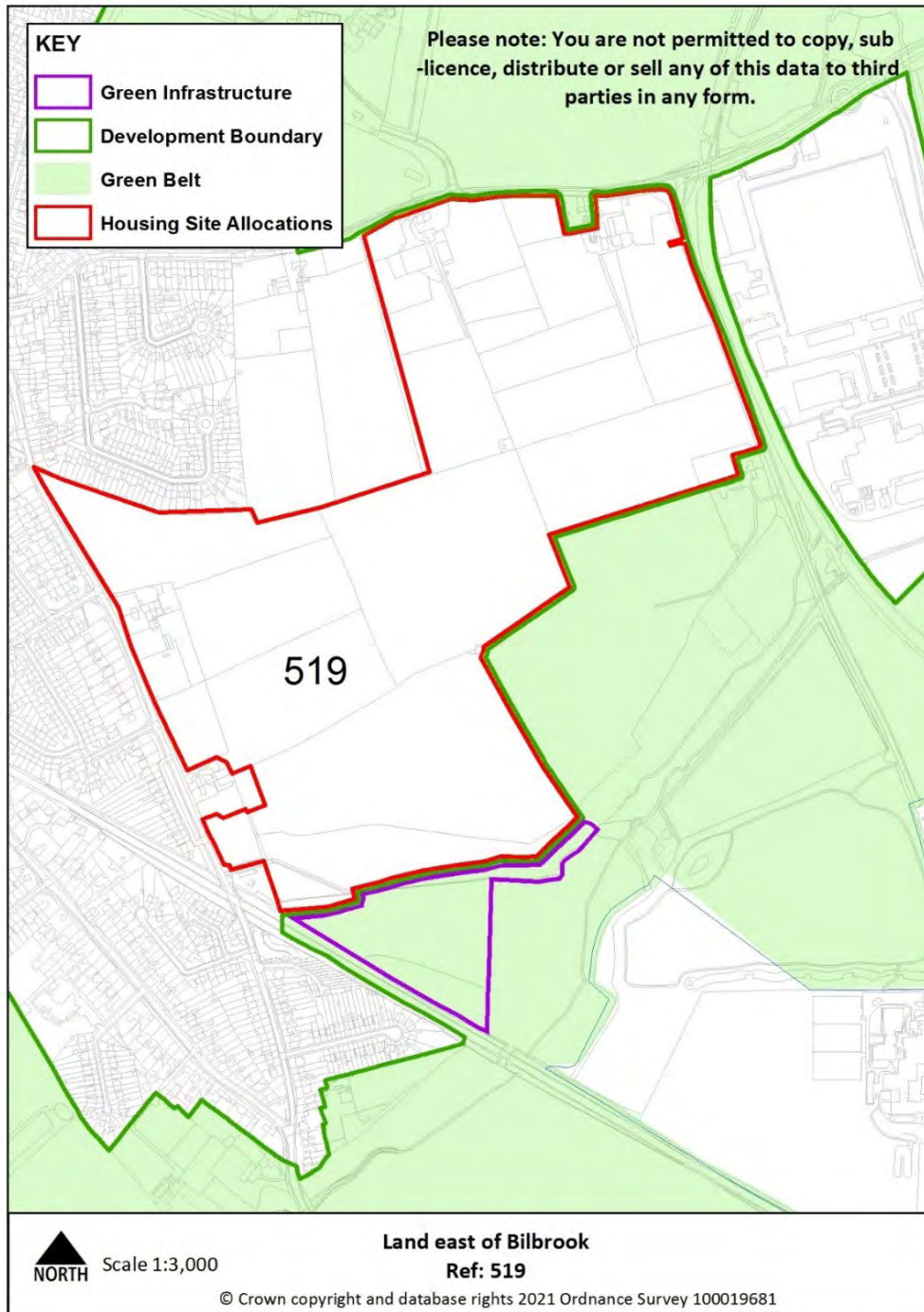
Duty to Cooperate

- Duty to Cooperate Topic Paper (2024)

Appendix B

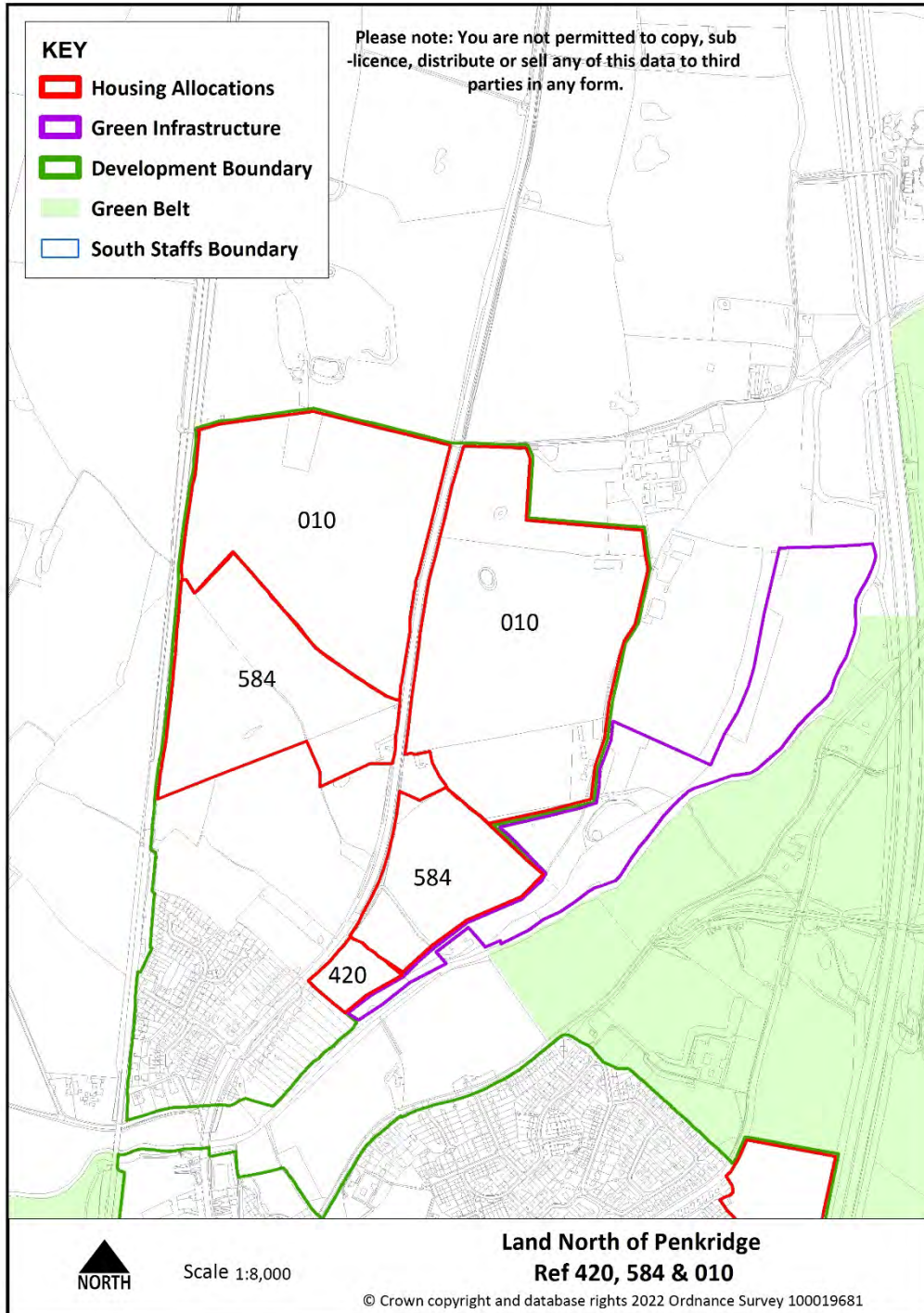
Strategic masterplanning location proformas

Site reference	519	Village	Bilbrook
Minimum capacity	750 dwellings	Address	Land east of Bilbrook
Site area	39.6 ha	Proposed use	Housing-led mixed use



Site infrastructure and access requirements	To deliver site in accordance with site specific requirements and master plan process set out in Policies MA1 and SA1.
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Site reference	420, 584 & 010	Village	Penkridge
Minimum capacity	1029 dwellings	Address	Land north of Penkridge off A449 and Lower Drayton Farm
Site area	51 ha	Proposed use	Housing-led mixed use

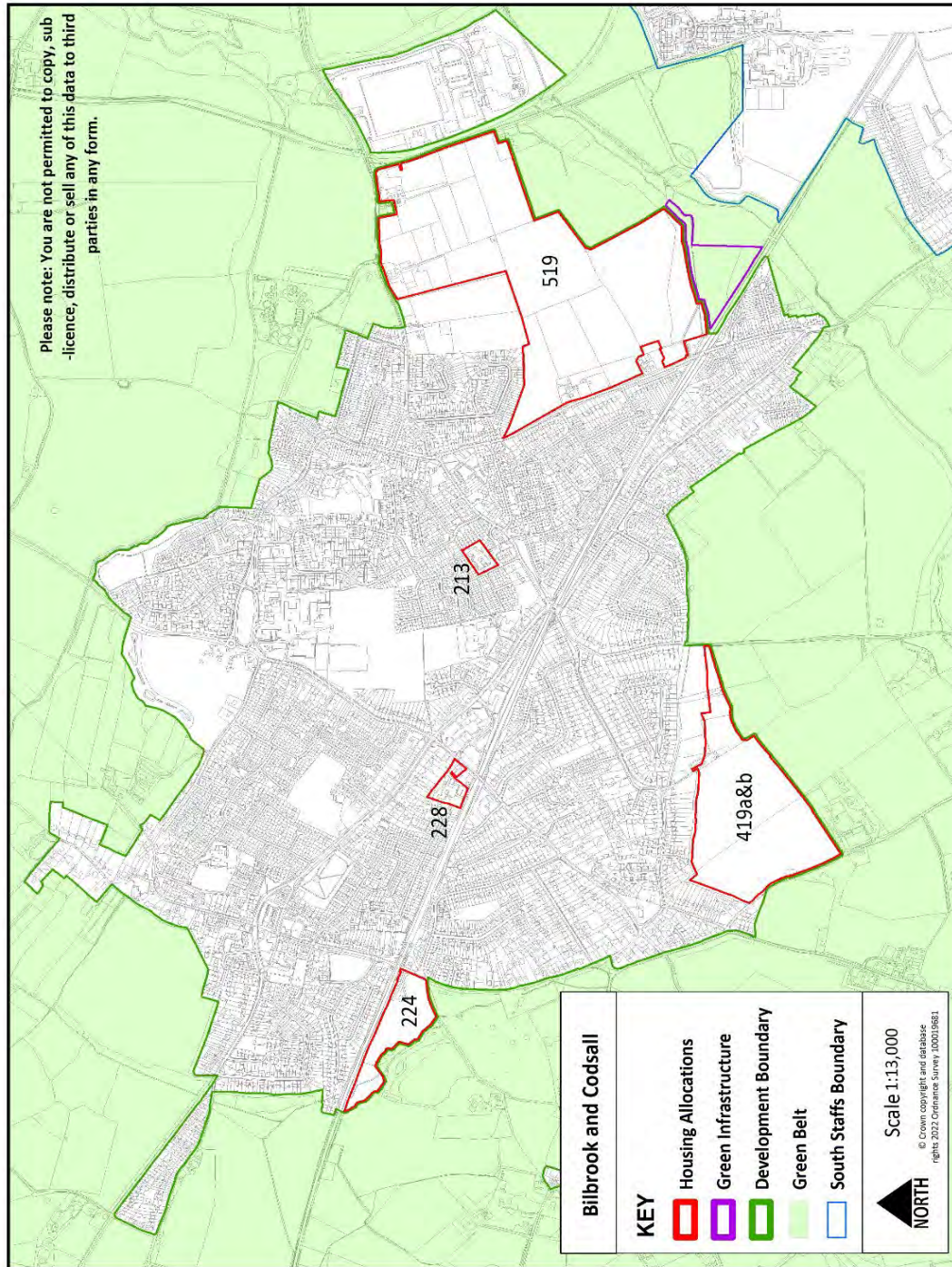


Site infrastructure and access requirements	To deliver site in accordance with site specific requirements and master plan process set out in Policy MA1 and SA2.
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Appendix C

Housing allocation maps and proformas

Tier 1 Bilbrook & Codsall

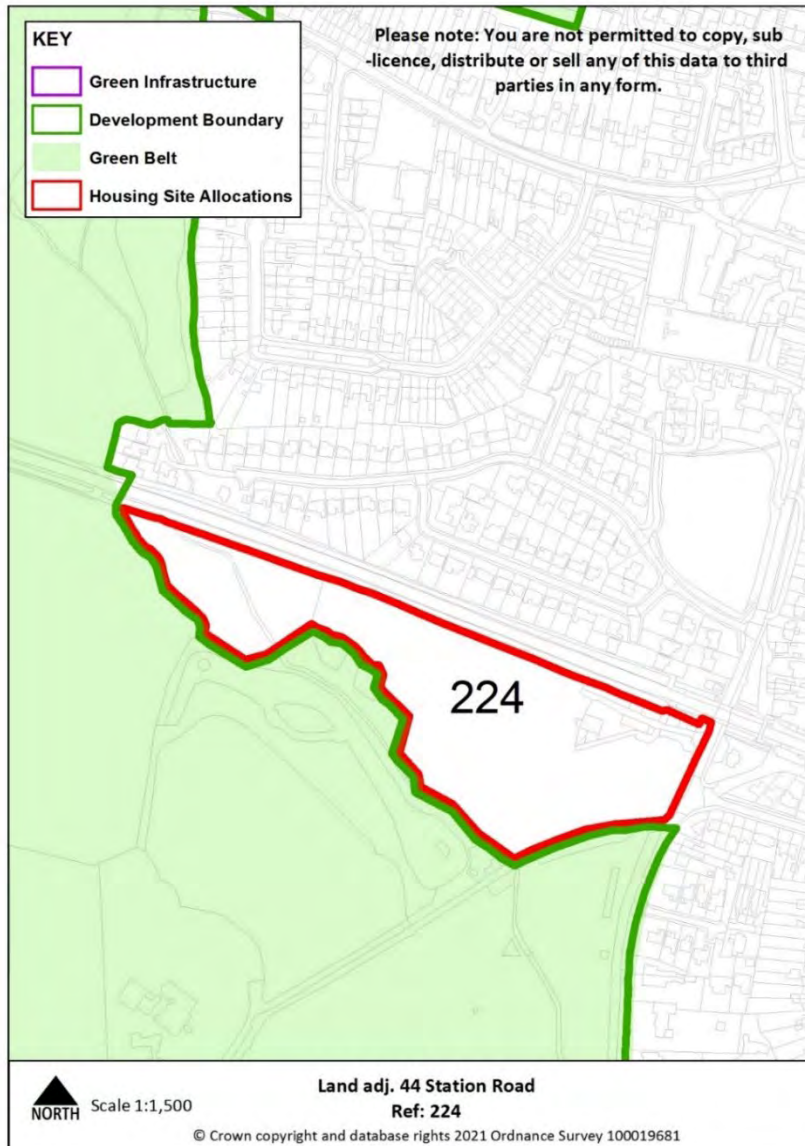


Site reference	213	Village	Bilbrook
Minimum capacity	13 dwellings	Address	Bilbrook House
Site area	0.5 ha	Proposed use	Housing



Key requirements	Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.
Proposed access/active travel measures	Provide vehicular and pedestrian access via Carter Avenue

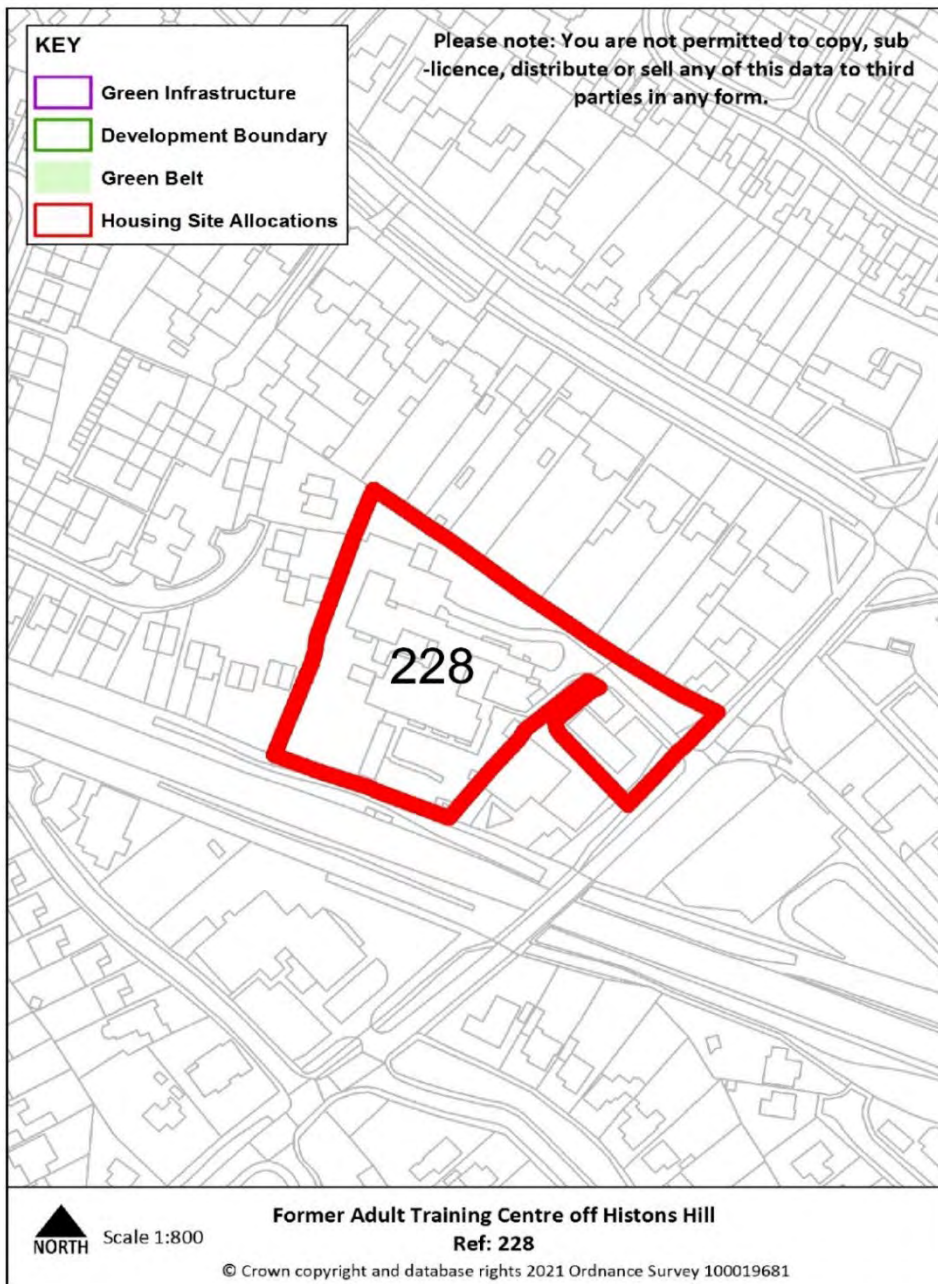
Site reference	224	Village	Codsall
Minimum capacity	85 dwellings	Address	Land adjacent to Station Road
Site area	4 ha	Proposed use	Housing



Key requirements	<ul style="list-style-type: none"> To deliver a 30 space car park for Codsall railway station Any historic environment mitigation for the site, as identified in the council’s Historic Environment Site Assessment Stage 2 (2022), including retention and enhancement of tree and hedgerow boundaries and additional planting to mitigate harm to the Conservation Area and protect existing historic character. In particular, the north -western border of the site should be retained and strengthened to clearly denote the former landscape and current parkland area” Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan
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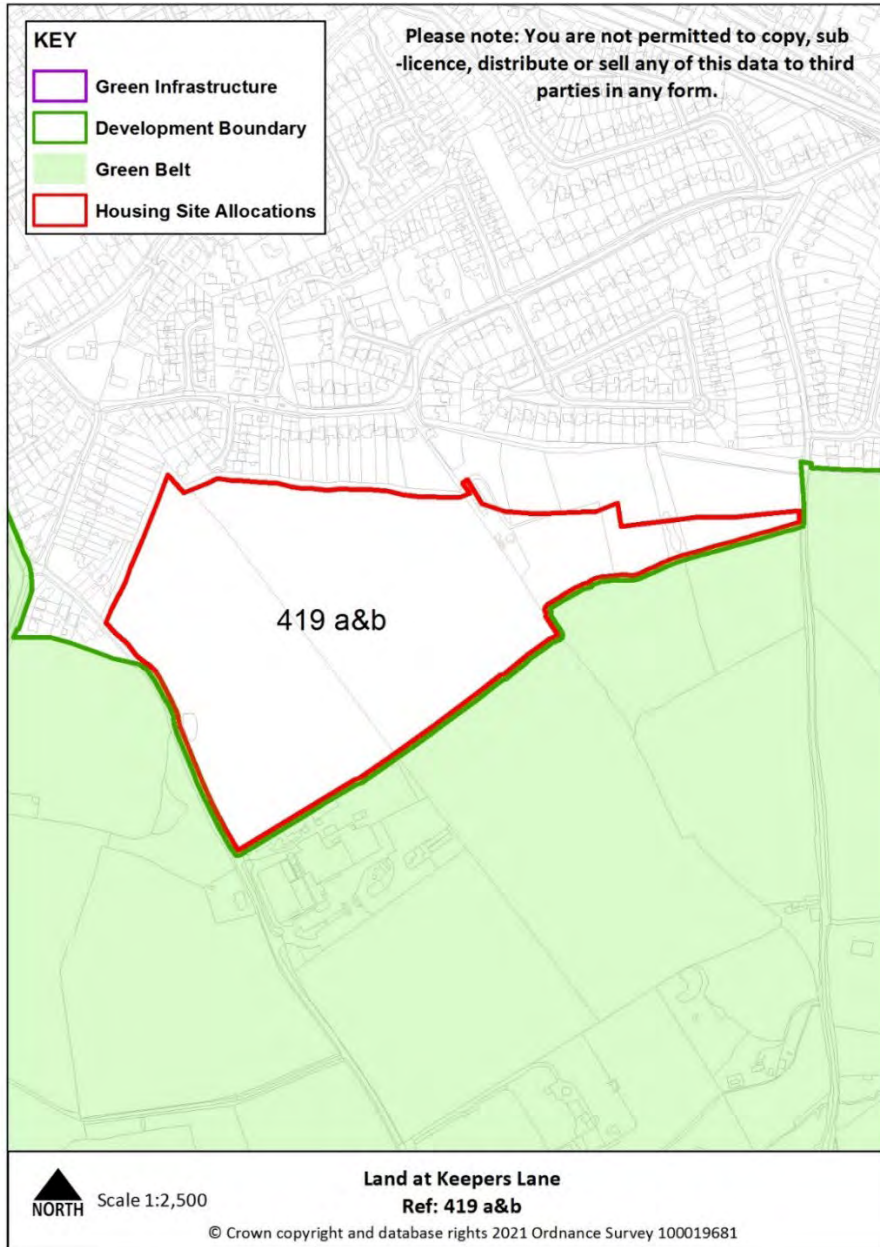
	policy standards.
Proposed access/active travel measures	Provide vehicular and pedestrian access via Station Road

Site reference	228	Village	Codsall
Minimum capacity	29 dwellings	Address	Former Adult Training Centre off Histsons Hill
Site area	0.8 ha	Proposed use	Housing



Key requirements	Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.
Proposed access/active travel measures	Provide vehicular and pedestrian access via Histsons Hill

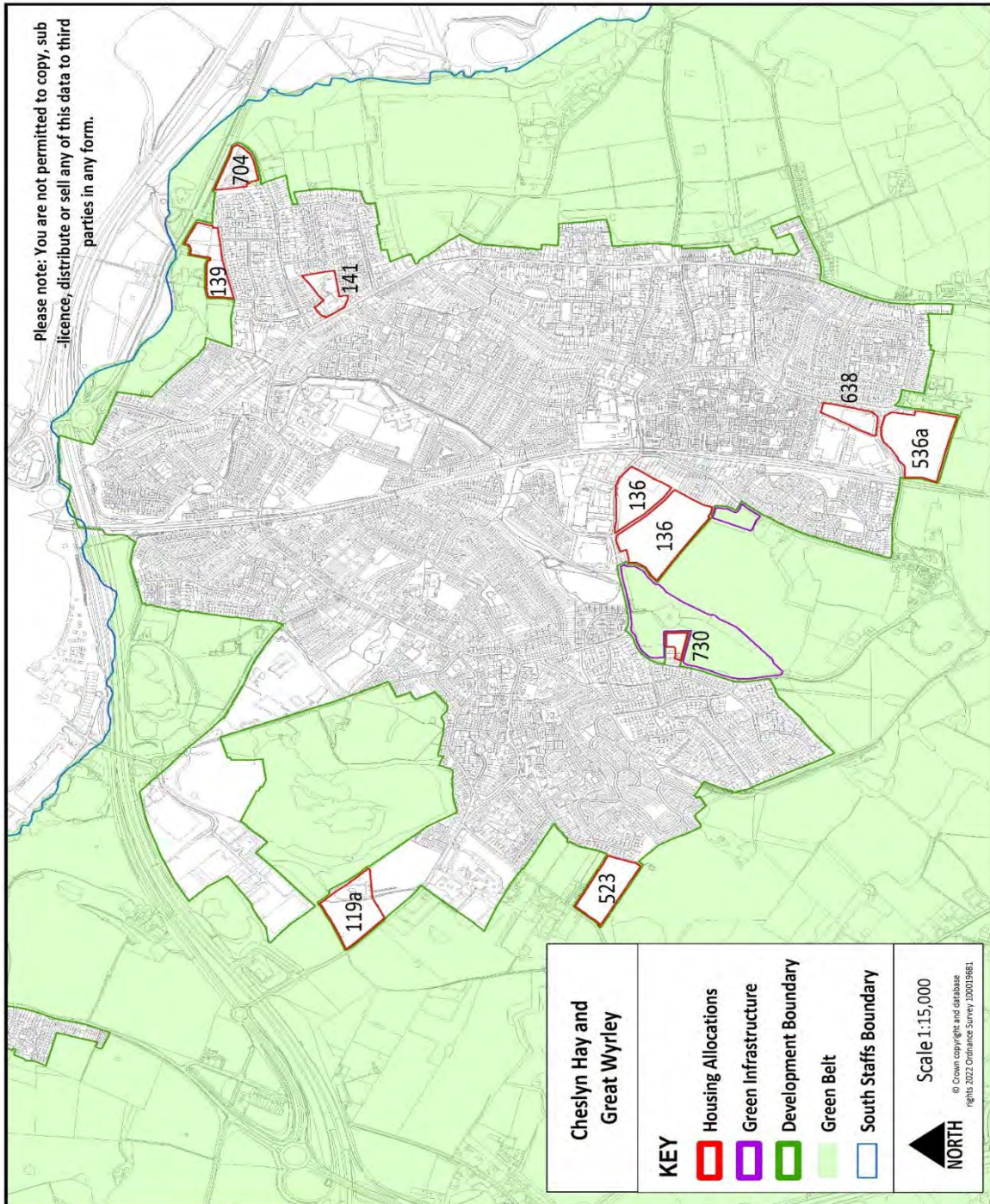
Site reference	419 a&b	Village	Codsall
Minimum capacity	317 dwellings	Address	Land at Keepers Lane & Wergs Hall Rd
Site area	15.1 ha	Proposed use	Housing



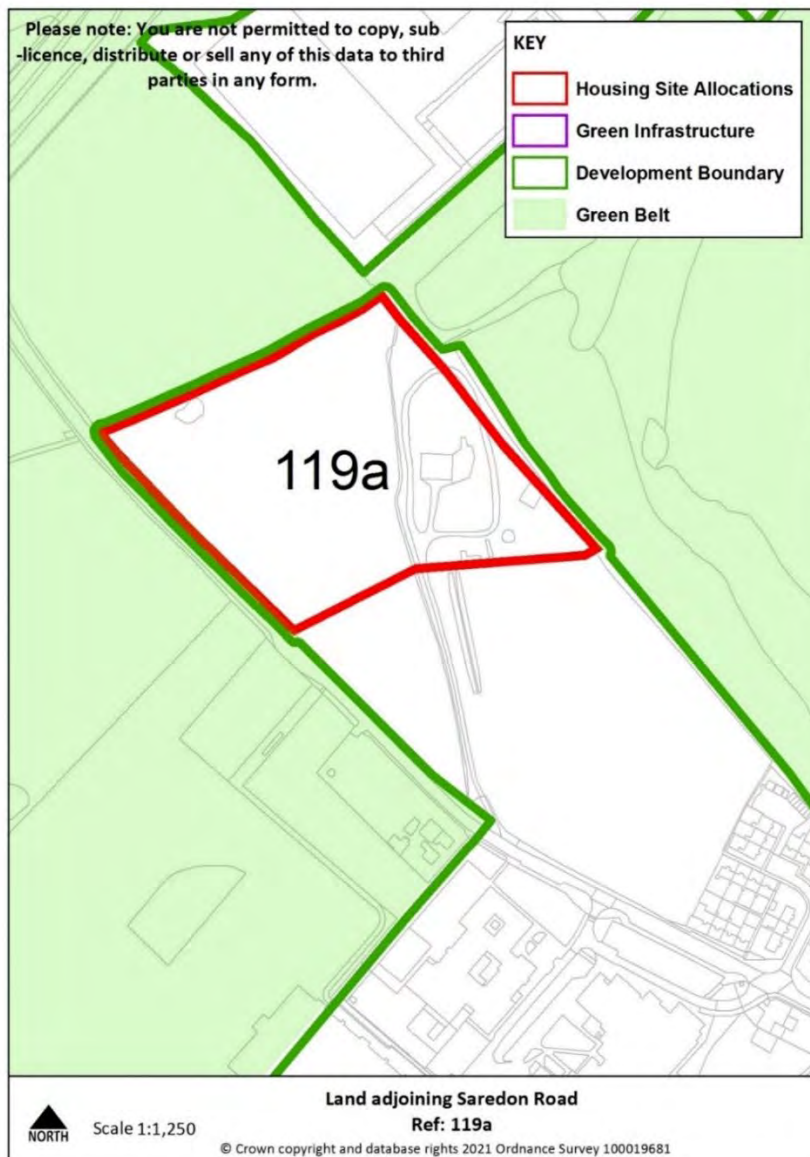
Key requirements	<ul style="list-style-type: none"> • Any historic environment mitigation for the site, as identified in the council’s Historic Environment Site Assessment Stage 2 (2022), including retention and enhancement of tree and hedgerow boundaries bordering the site and any mitigation required as a result of archaeological investigations • Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant
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	development plan policy standards.
Proposed access/active travel measures	Provide vehicular and pedestrian access via Wergs Hall Road and into the adjacent allocated housing site, including provision of a through road from Keepers Lane to Wergs Hall Road and extension of existing footway.

Cheslyn Hay & Great Wyrley



Site reference	119a	Village	Cheslyn Hay
Minimum capacity	60	Address	Land adjoining Saredon Road
Site area	2.9 ha	Proposed use	Housing



Key requirements

- The tree and hedgerow boundaries that border the site should be retained.
- Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.
- Development of the site should be in accordance with the recommendations set out in the Level 2 Strategic Flood Risk Assessment detailed site summary table.
- Provide a site-specific Flood Risk Assessment which shows development laid out as to avoid the floodplain and finished floor

	<p>levels 600mm above the 1 in 100 plus climate change flood level.</p> <ul style="list-style-type: none"> • Site layout and design to be based on an environmental assessment that takes into account permitted mineral operations and avoids additional restrictions being imposed on those operations. • Any historic environment mitigation for the site, as identified in the council’s Historic Environment Site Assessment Stage 2 (2022), including retention and enhancement of tree and hedgerow boundaries bordering the site and any mitigation required as a result of archaeological investigations.
<p>Proposed access/active travel measures</p>	<p>Provide vehicular, walking, wheeling and cycle access onto Saredon Road, including extension of footway and contribute to Staffordshire County Council’s Local Walking and Cycling Infrastructure Plan (LCWIP) for Cheslyn Hay/Great Wyrley. Dropped crossing and tactile paving should be provided at all side roads on all routes directly accessing the development.</p>

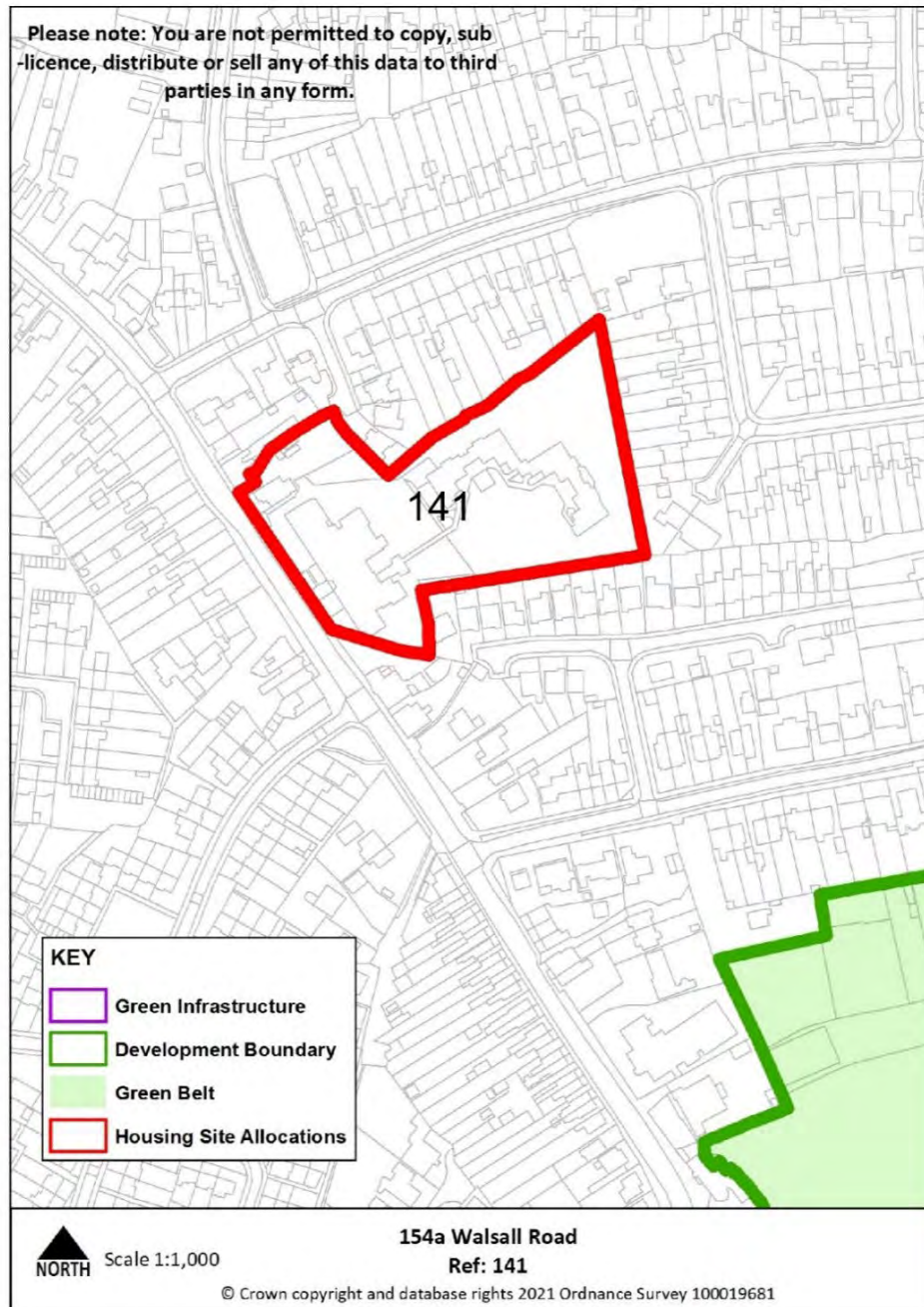
Site reference	523	Village	Cheslyn Hay
Minimum capacity	49	Address	Land east of Wolverhampton Road
Site area	2.4 ha	Proposed use	Housing



Key requirements	<ul style="list-style-type: none"> • The tree and hedgerow boundaries that border the site should be retained • Site layout and design to be based on an environmental assessment that takes into account permitted mineral operations and avoids additional restrictions being imposed on those operations • Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.
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Proposed access/active travel measures	Provide vehicular, walking, wheeling and cycling access onto Wolverhampton Road, and contribute to Staffordshire County Council's Local Walking and Cycling Infrastructure Plan (LCWIP) for Cheslyn Hay/Great Wyrley. Additionally, walking and cycling access to Pinfold Lane should be explored. Dropped crossing and tactile paving should be provided at all side roads on all routes directly accessing the development.
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Site reference	141	Village	Great Wyrley
Minimum capacity	31 dwellings	Address	154a Walsall Road
Site area	1.2 ha	Proposed use	Housing

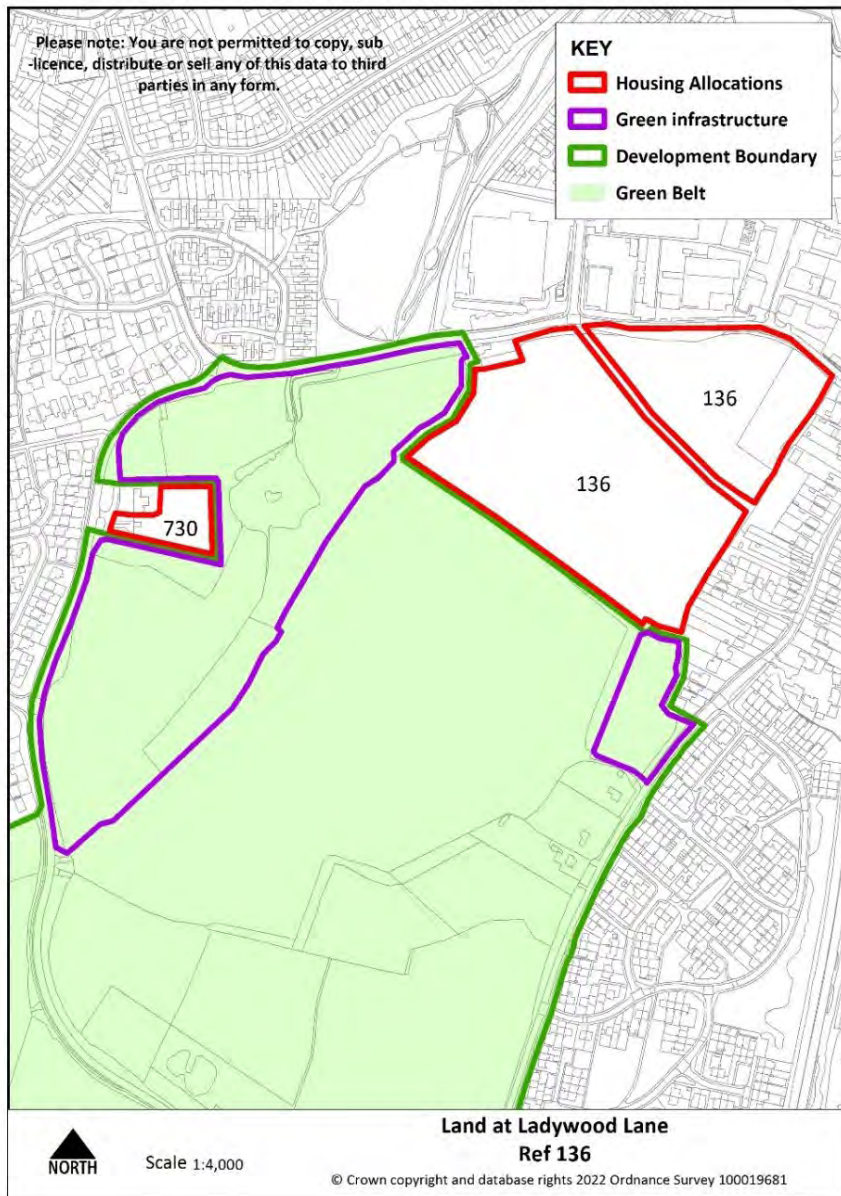


Key infrastructure requirements

- Any historic environment mitigation for the site, as identified in the council’s Historic Environment Site Assessment Stage 2 (2022), including any mitigation required as a result of archaeological investigations
- Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development

	plan policy standards.
Proposed access/active travel measures	Provide vehicular and pedestrian access via Walsall Road.

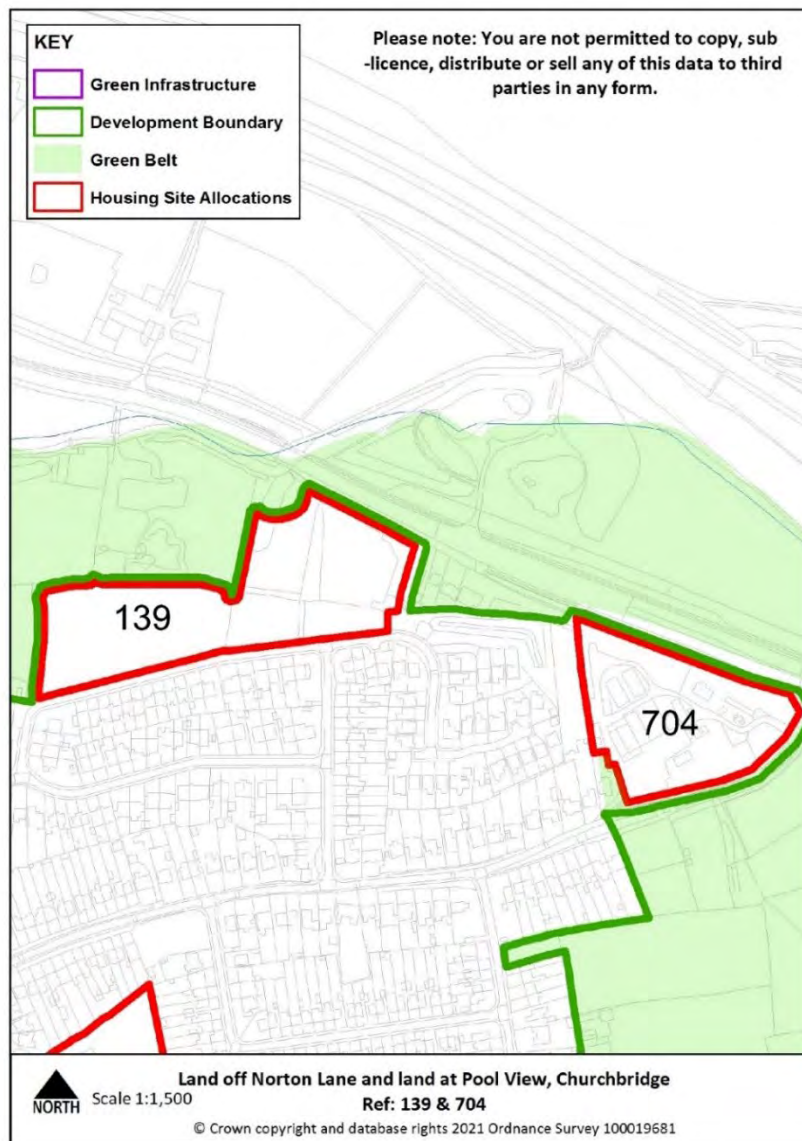
Site reference	136	Village	Great Wyrley
Minimum capacity	50 dwellings consented on allocated site (21/00631/FUL) alongside minimum 109 dwellings on safeguarded land	Address	Land at Ladywood Lane
Site area	7.4 ha	Proposed use	Housing



Key infrastructure requirements	<ul style="list-style-type: none"> To deliver an off-site country park and land for allotments on the adjacent land parcels on the policies map identified as green infrastructure, including display board highlighting the sites mining heritage. Any historic environment mitigation for the site, as identified in the
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	<p>council’s Historic Environment Site Assessment Stage 2 (2022), including any mitigation required as a result of archaeological investigations</p> <ul style="list-style-type: none"> • To deliver parking for Landywood Station • Create a strong defensible boundary along the south-west edge of the site • Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.
<p>Proposed access/active travel measures</p>	<p>Provide vehicular and pedestrian access via Landywood Lane and Upper Landywood Lane, alongside pedestrian access into new country park. Walking, wheeling and cycling access onto Landywood Lane should be provided to contribute to active travel improvements along Landywood Lane.</p>

Site reference	139	Village	Great Wyrley
Minimum capacity	46 dwellings	Address	Pool View, Churchbridge
Site area	2.2 ha	Proposed use	Housing

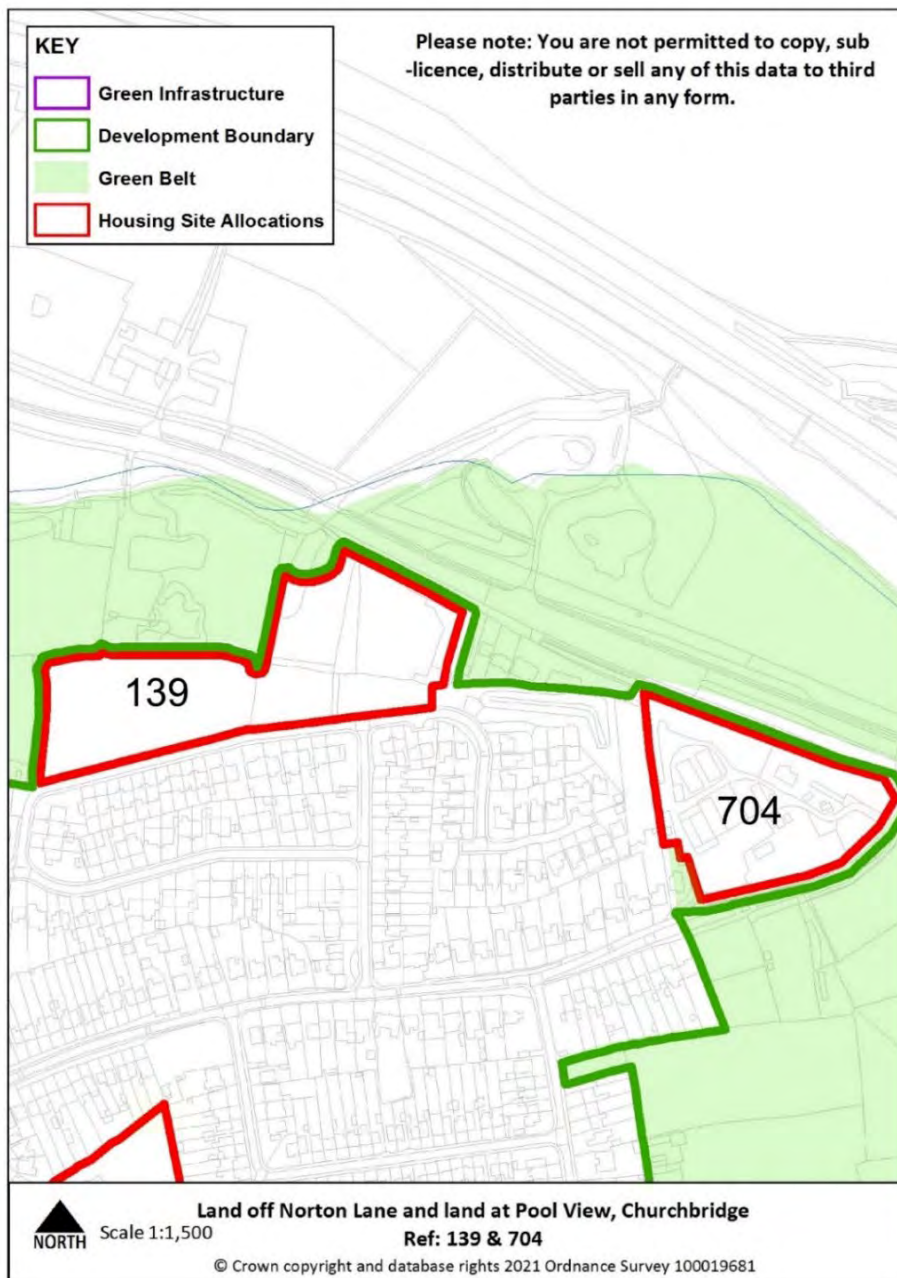


Key infrastructure requirements

- Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.
- Development of the site should be in accordance with the recommendations set out in the Level 2 Strategic Flood Risk Assessment detailed site summary table.
- Provide a site-specific Flood Risk Assessment which shows development laid out as to avoid the floodplain and finished floor levels 600mm above the 1 in 100 plus climate change flood level.

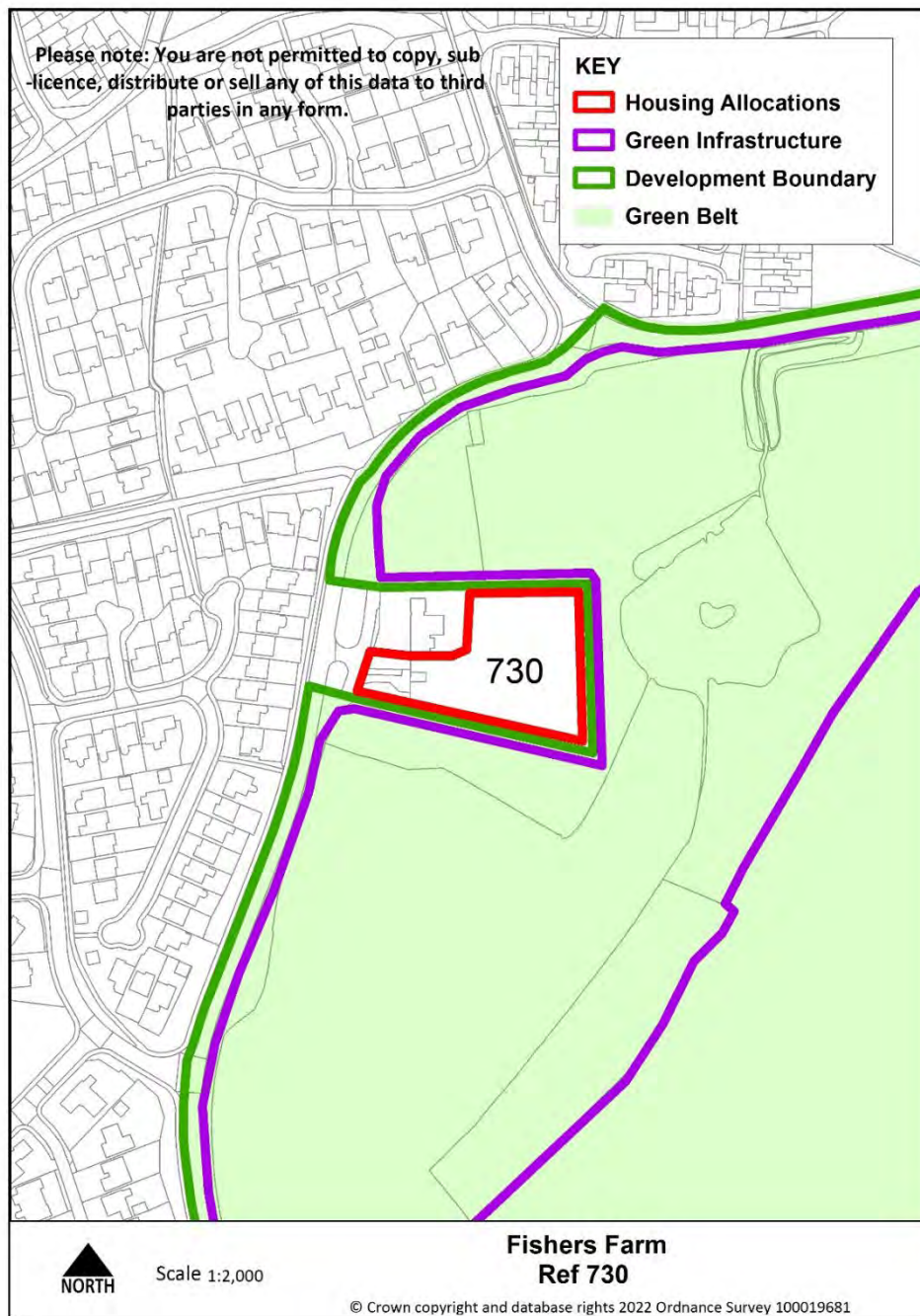
	<ul style="list-style-type: none">Any historic environment mitigation for the site, as identified in the council’s Historic Environment Site Assessment Stage 2 (2022), including retaining and enhancing tree and hedgerow planting as far as possible throughout the site and delivering any mitigation required as a result of archaeological investigations.
Proposed access/active travel measures	Provide vehicular and pedestrian access via Pool View.

Site Reference	704	Village	Great Wyrley
Minimum capacity	31 dwellings	Address	Land off Norton Lane
Site area	1.3 ha	Proposed Use	Housing



Key requirements	<ul style="list-style-type: none"> • Any historic environment mitigation for the site, as identified in the council’s Historic Environment Site Assessment Stage 2 (2022), including any mitigation required as a result of archaeological investigations. • Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.
Proposed access	Provide vehicular and pedestrian access via Norton Lane, including pedestrian crossing.

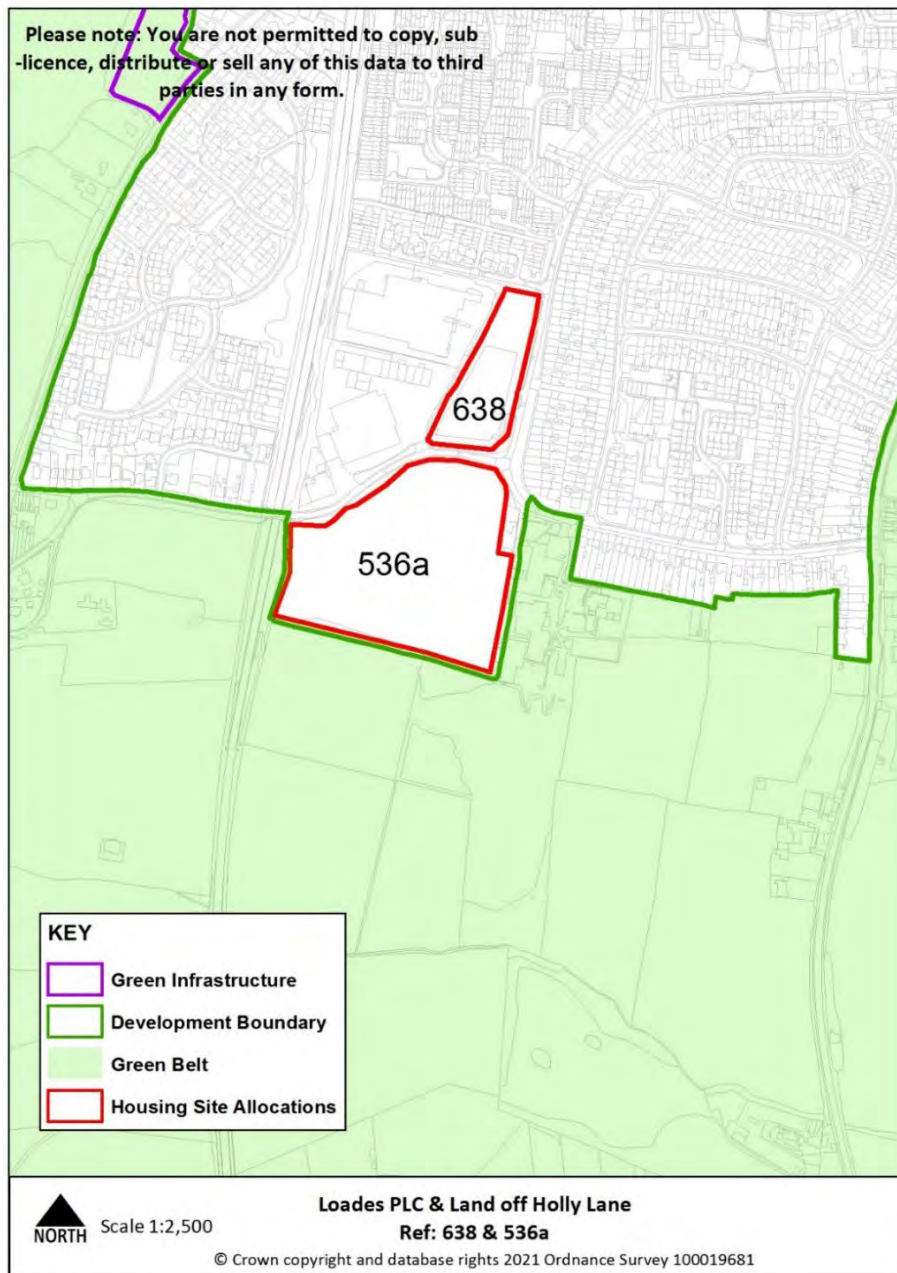
Site Reference	730	Village	Great Wyrley
Minimum capacity	10 dwellings	Address	Fishers Farm
Site area	0.3 ha	Proposed Use	Housing



Key requirements	<ul style="list-style-type: none"> • The boundary to the south of the site should be strengthened through additional planting. • Any historic environment mitigation for the site, as identified in the council’s Historic Environment Site Assessment Stage 2 (2022), including any mitigation required as a result of archaeological investigations. • Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport,
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	housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.
Proposed access/active travel measures	Provide vehicular and pedestrian access via Upper Landywood Lane.

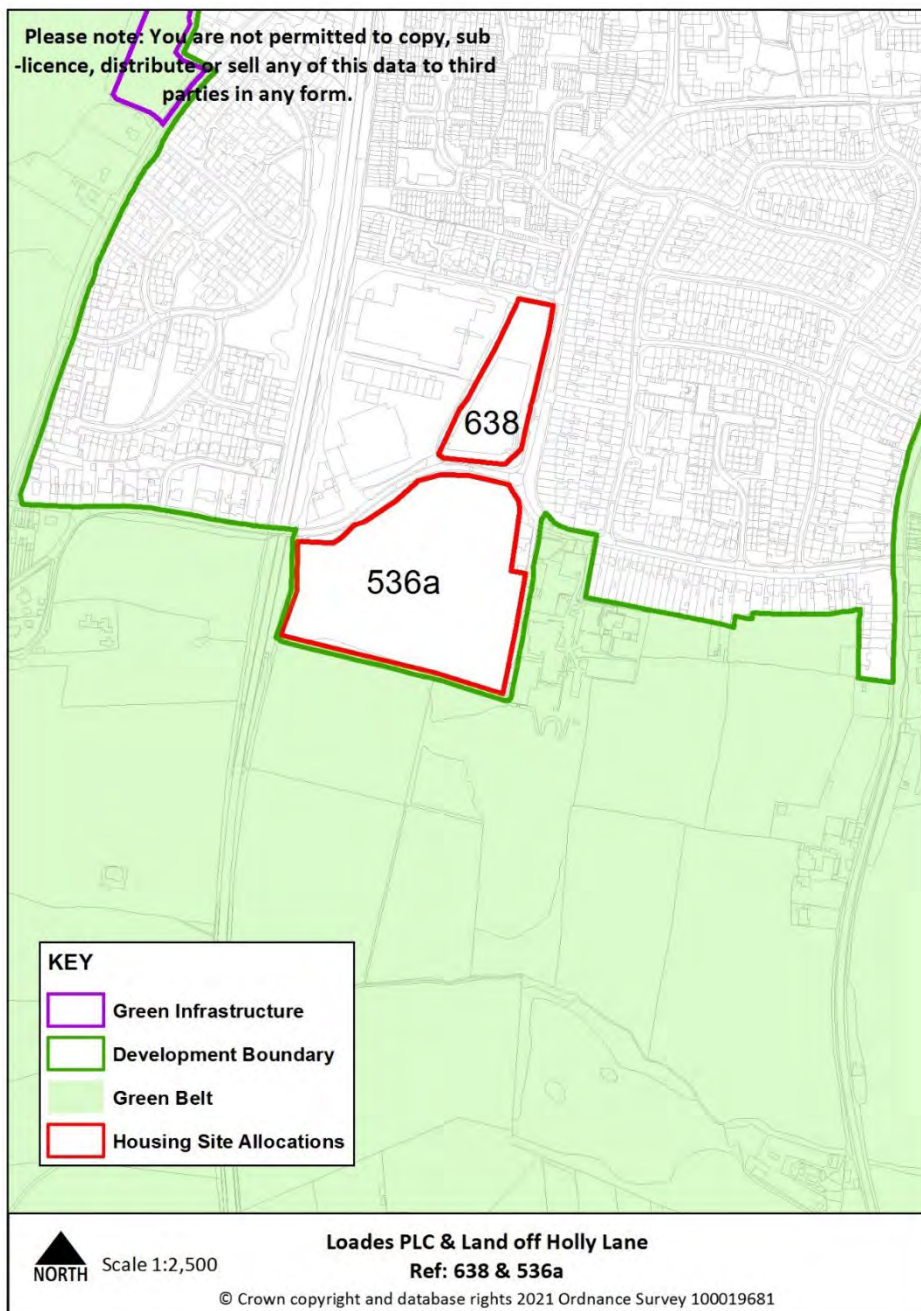
Site Reference	536a	Village	Great Wyrley
Minimum capacity	84 dwellings	Address	Land off Holly Lane
Site area	4 ha	Proposed Use	Housing



Key requirements	<ul style="list-style-type: none"> • Deliver on site drop off parking to serve Landywood Primary School • Deliver on site specialist older persons housing • Any historic environment mitigation for the site, as identified in the council’s Historic Environment Site Assessment Stage 2 (2022), including retention and enhancement of tree and hedgerow boundaries bordering the site and any mitigation required as a result of archaeological investigations. • Reinforce landscaping on southern site edge to provide a defensible boundary. • Any relevant policy requirements including affordable housing, open
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	space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.
Proposed access/active travel measures	Provide vehicular and pedestrian access via Holly Lane.

Site Reference	638	Village	Great Wyrley
Minimum capacity	29 dwellings	Address	Loades Plc
Site area	1.1ha	Proposed Use	Housing

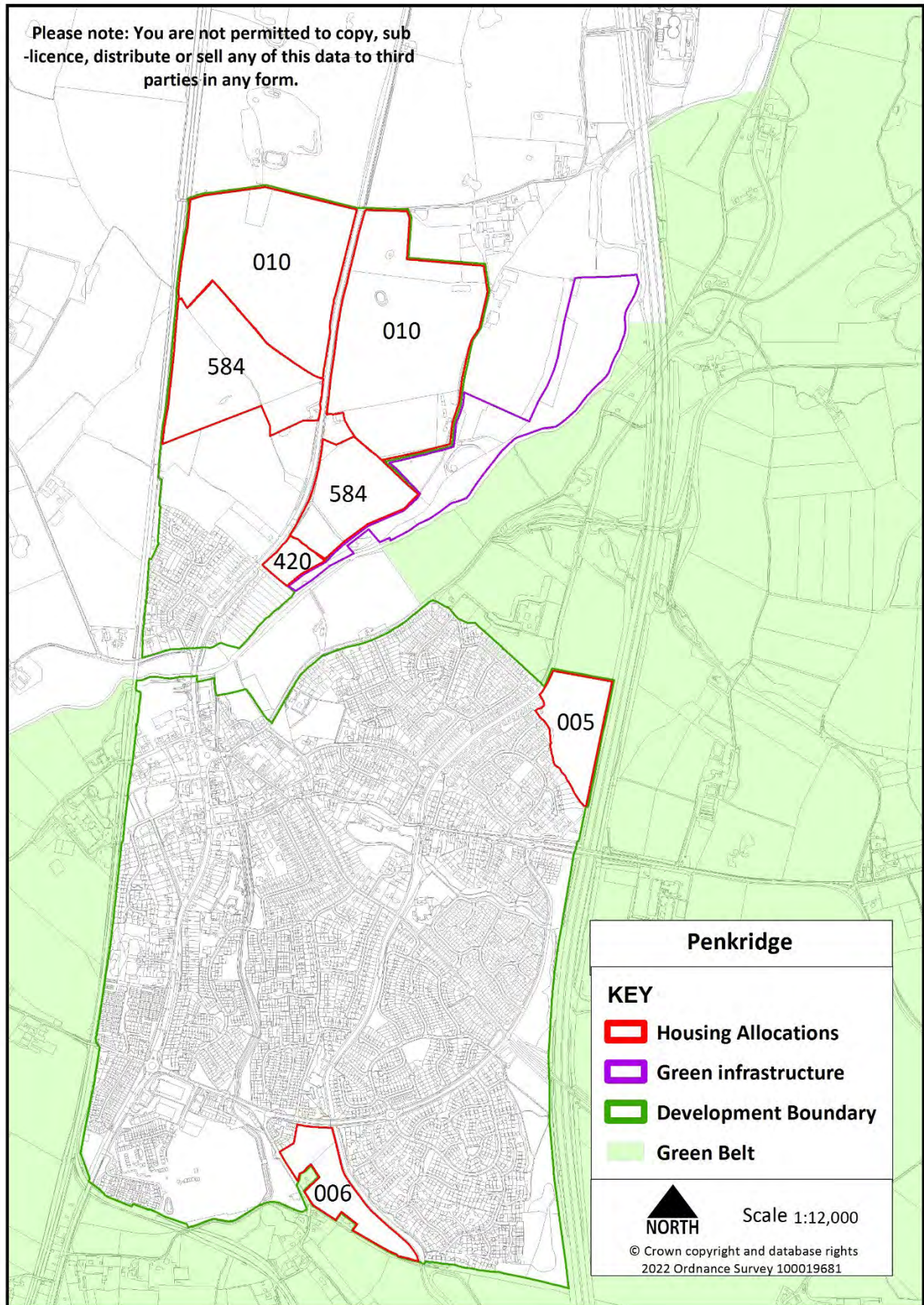


Key requirements

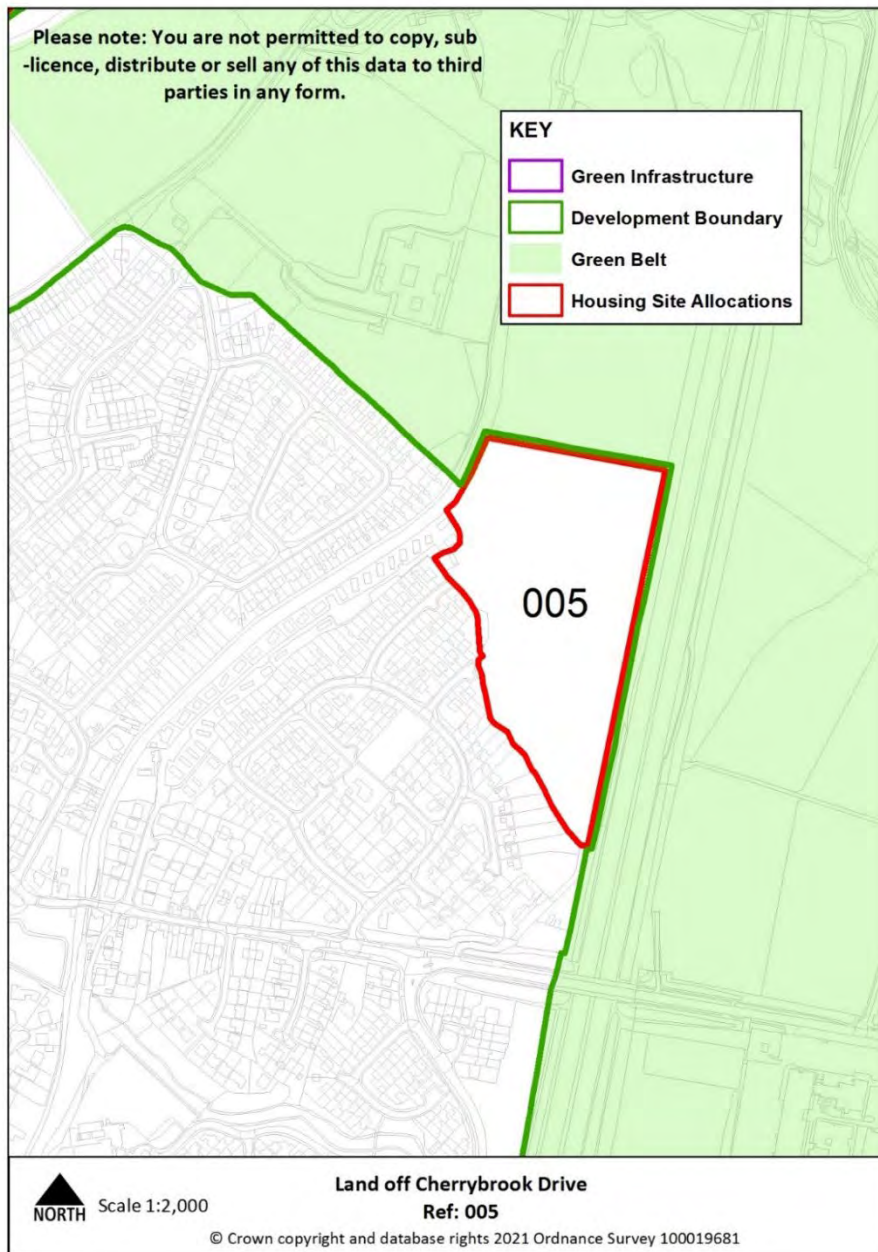
- Any historic environment mitigation for the site, as identified in the council’s Historic Environment Site Assessment Stage 2 (2022), including retention and enhancement of tree and hedgerow boundaries bordering the site and any mitigation required as a result of archaeological investigations
- Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant

	development plan policy standards.
Proposed access/active travel measures	Provide vehicular and pedestrian access via Gorsey Lane

Penkridge



Site reference	005	Village	Penkridge
Minimum capacity	88 dwellings	Address	Land at Cherrybrook
Site area	4.2 ha	Proposed use	Housing



Key requirements	<ul style="list-style-type: none"> Any historic environment mitigation for the site, as identified in the council’s Historic Environment Site Assessment Stage 2 (2022), including retention and enhancement of tree and hedgerow boundaries, a buffer of additional planting along the north-western boundary to protect the existing character of the Canal Conservation Area and any mitigation required as a result of archaeological investigations Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure,
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	delivered in line with the relevant development plan policy standards.
Proposed access/active travel measures	Provide, vehicle walking, wheeling and cycling access onto Cannock Road, through the existing Cherrybrook estate, and contribute towards Staffordshire County Council’s proposed walking, wheeling and cycling improvements along Cannock Road.

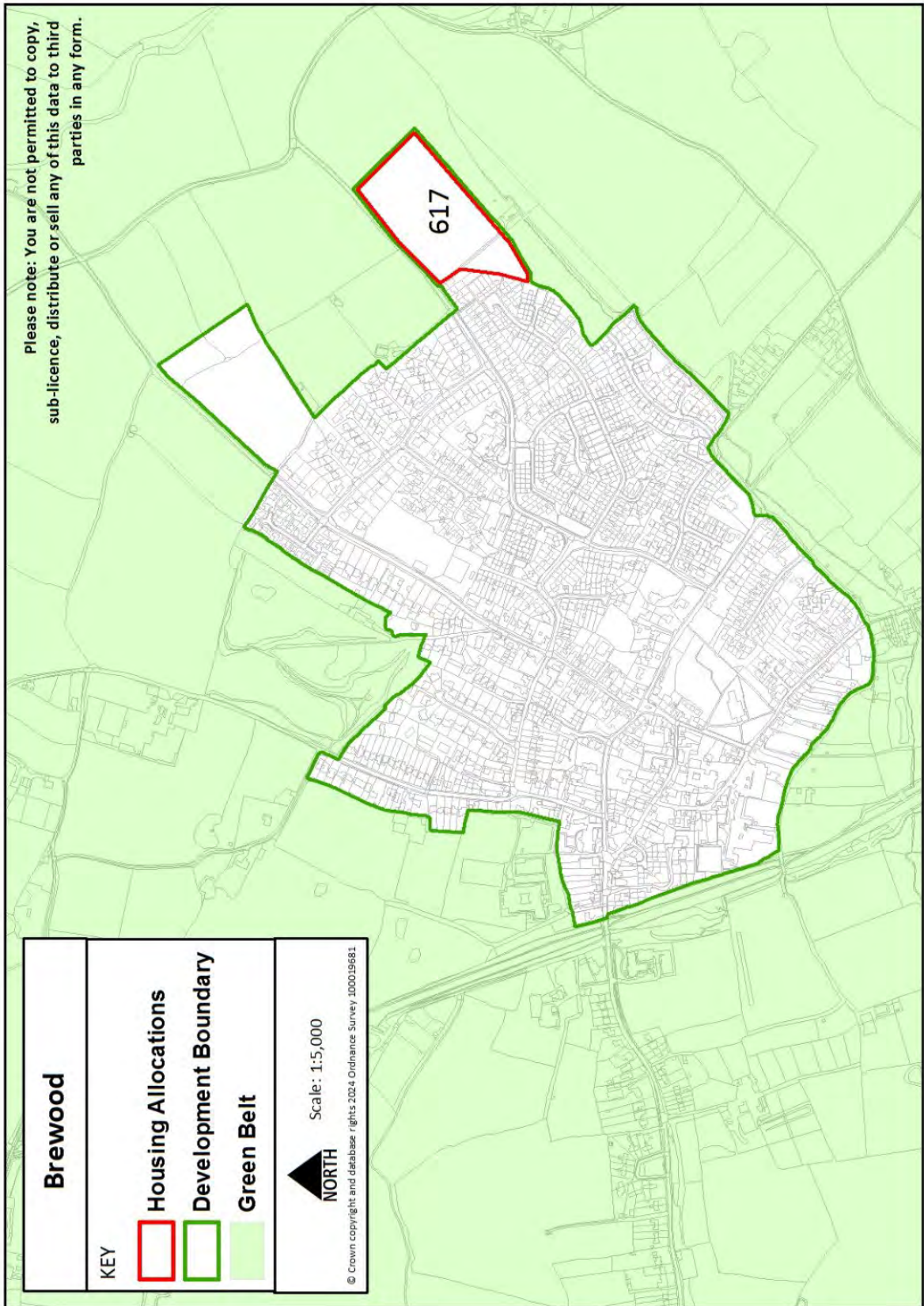
Site reference	006	Village	Penkridge
Minimum capacity	80 dwellings	Address	Land at Boscomoor Lane
Site area	3.8ha	Proposed use	Housing



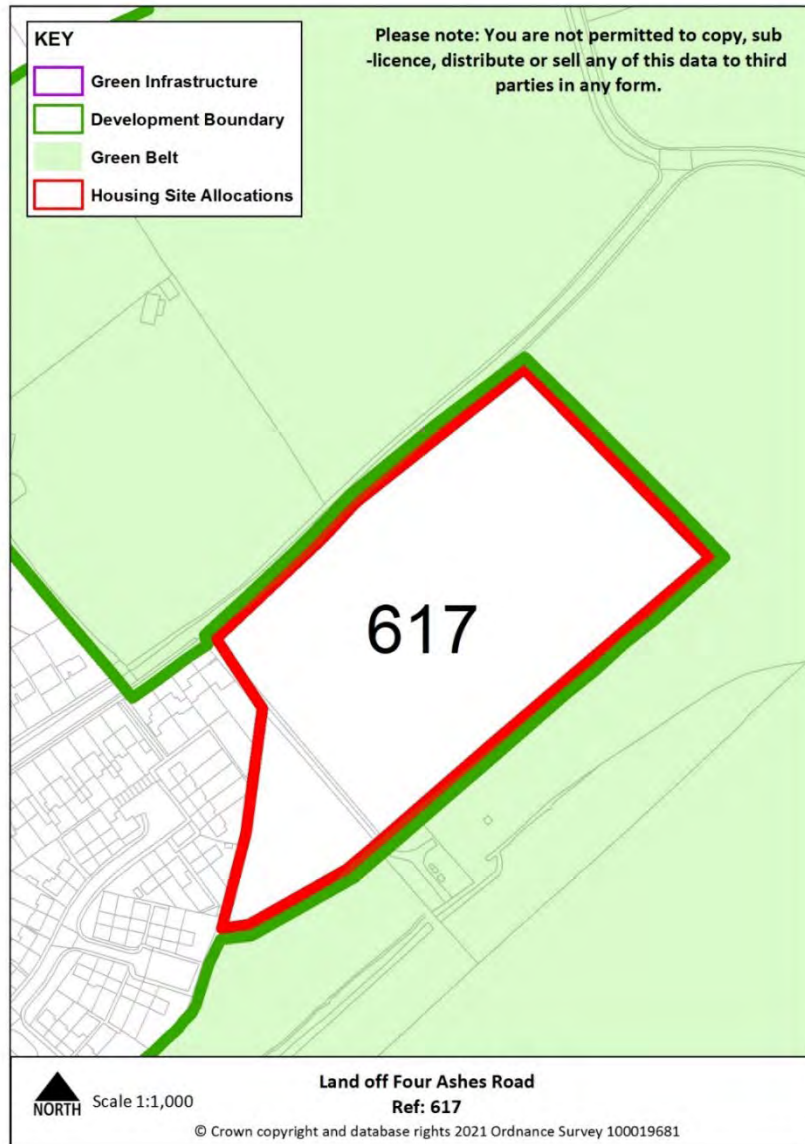
Key requirements	<ul style="list-style-type: none"> Any historic environment mitigation for the site, as identified in the council’s Historic Environment Site Assessment Stage 2 (2022), including retention and enhancement of tree and hedgerow boundaries, reinforcement of planting on the site’s southern and eastern boundaries and consideration of setbacks to limit visibility from the towpath. Consider opportunities for pedestrian connections onto the towpath from the northern and southern end of the site and deliver any mitigation required as a result of archaeological investigations
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	<ul style="list-style-type: none"> Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.
Proposed access/active travel measures	Provide vehicular and pedestrian access via Boscomoor Lane ensuring continuous pedestrian links between the site and Wolgarston Way and active travel links onto the canal towpath along the eastern edge of the site, as well as improvements to the canal towpath surface.

Tier 2 Brewood



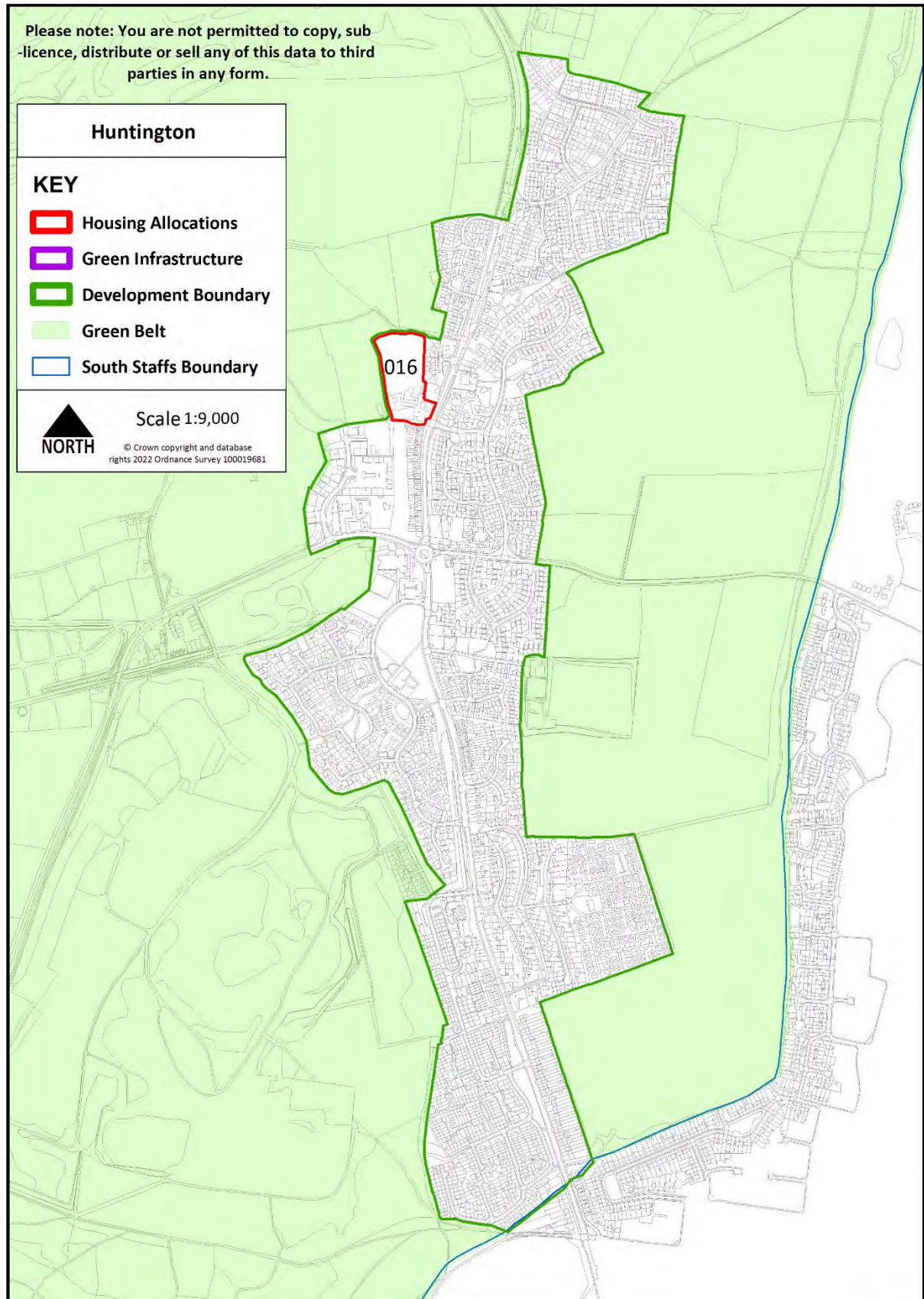
Site reference	617	Village	Brewood
Minimum capacity	63 dwellings	Address	Land at Four Ashes Road
Site area	3 ha	Proposed use	Housing



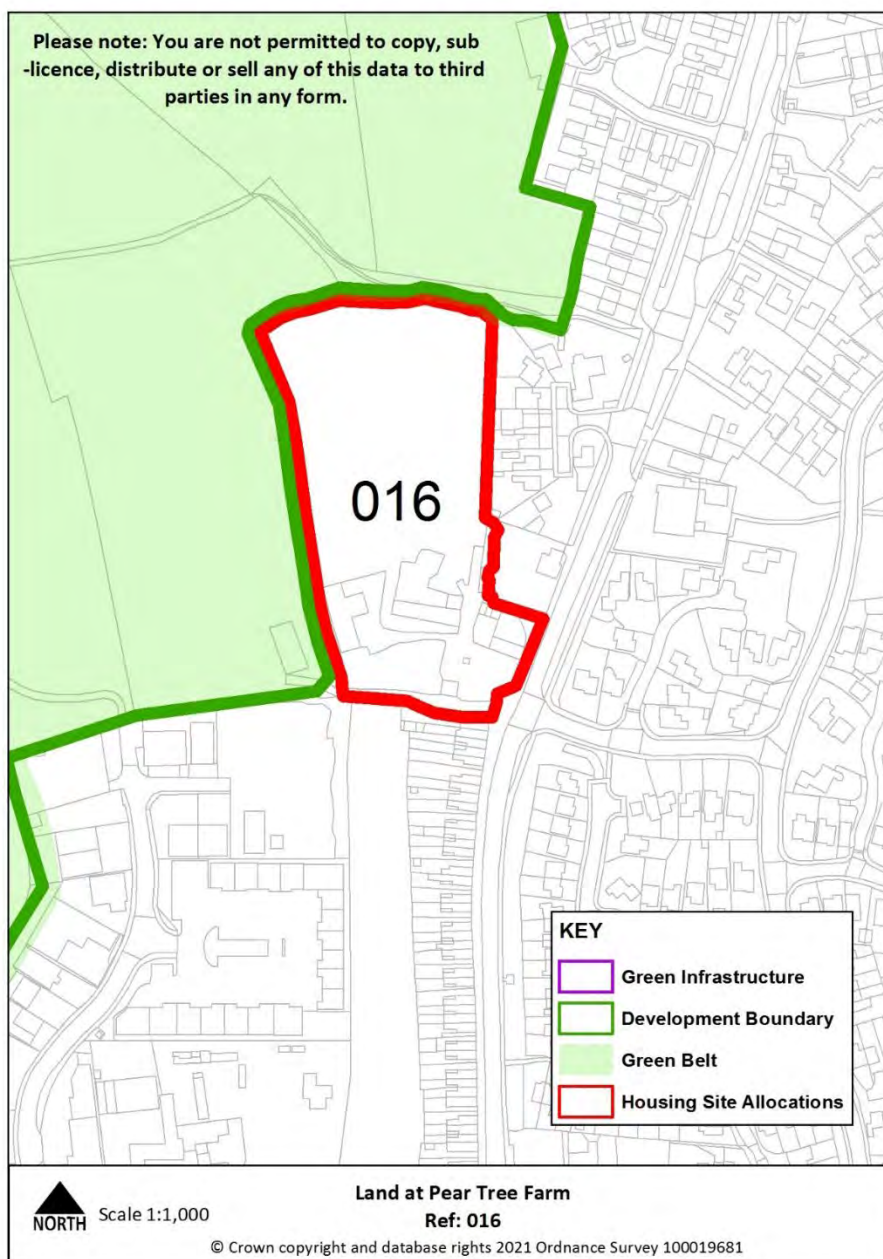
Key requirements	<ul style="list-style-type: none"> Any historic environment mitigation for the site, as identified in the council’s Historic Environment Site Assessment Stage 2 (2022), including retention and enhancement of tree and hedgerow boundaries bordering the site and any mitigation required as a result of archaeological investigations Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards. Development of the site should be in accordance with the
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	<p>recommendations set out in the Level 2 Strategic Flood Risk Assessment detailed site summary table.</p> <ul style="list-style-type: none">• Provide a site-specific Flood Risk Assessment which shows development laid out as to avoid the floodplain and finished floor levels 600mm above the 1 in 100 plus climate change flood level.
Proposed access/active travel measures	Provide vehicular and pedestrian access via Four Ashes Road including extension of existing footway. Walking, wheeling and cycling access through to Stonebridge Road should be explored and provided if feasible.

Huntington



Site Reference	016	Village	Huntington
Minimum capacity	39	Address	Land at Pear Tree Farm
Site area	1.6 ha	Proposed Use	Housing

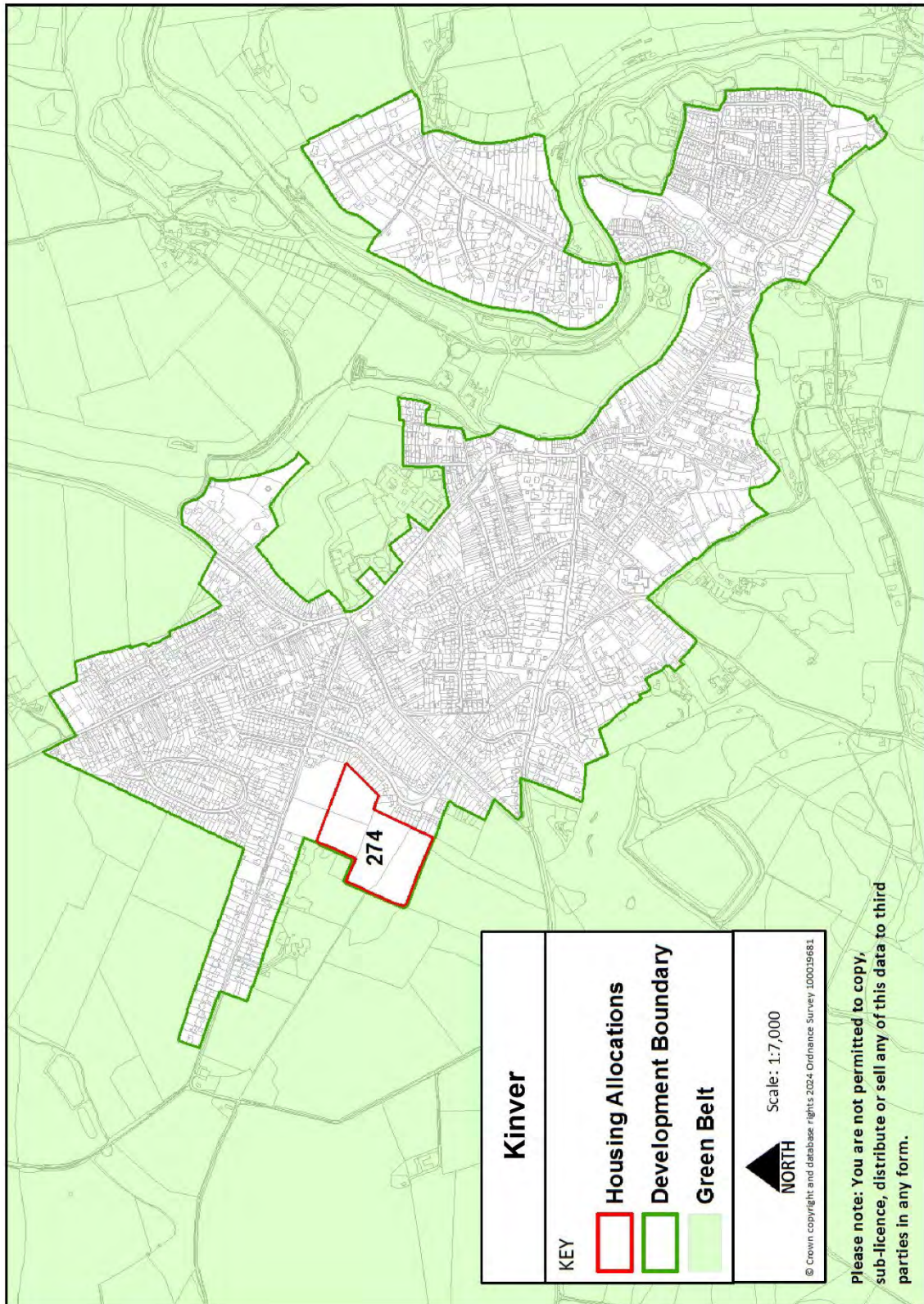


Key requirements

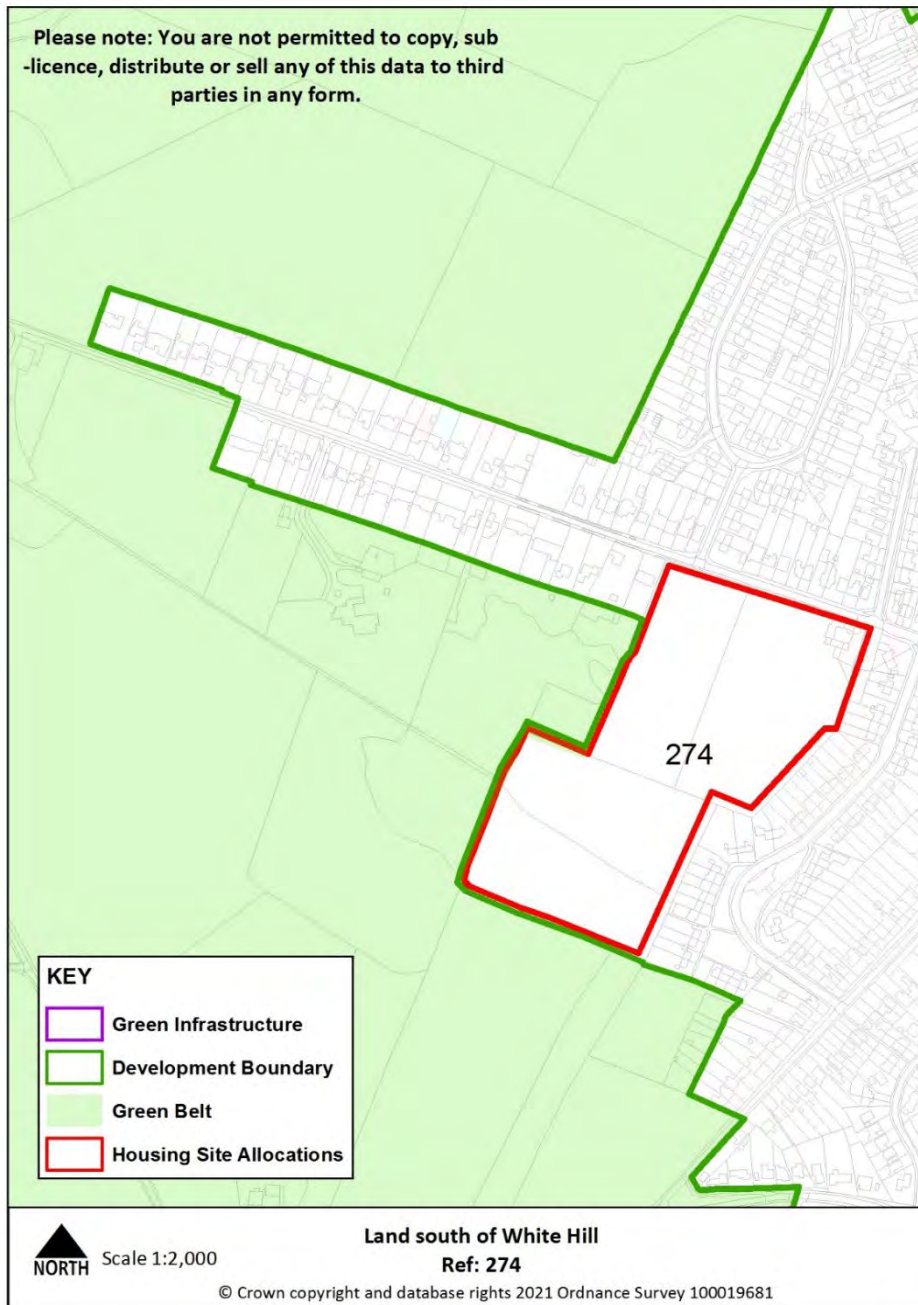
- Any historic environment mitigation for the site as identified in the council’s Historic Environment Site Assessment Stage 2 (2022), including retention and enhancement of tree and hedgerow boundaries bordering the site to conserve the setting of the Grade II listed farmhouse and any mitigation required as a result of archaeological investigations.
- Development must not prejudice use of the adjacent playing field site and must ensure that any proposed layout retains an access to this facility.
- Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing

	mix and green infrastructure, delivered in line with the relevant development plan policy standards.
Proposed access/active travel measures	Provide vehicular, walking, wheeling and cycling access onto and across A34 Stafford Road, and contribute towards Staffordshire County Council’s proposed walking, wheeling and cycling improvements along A34 Stafford Road.

Kinver



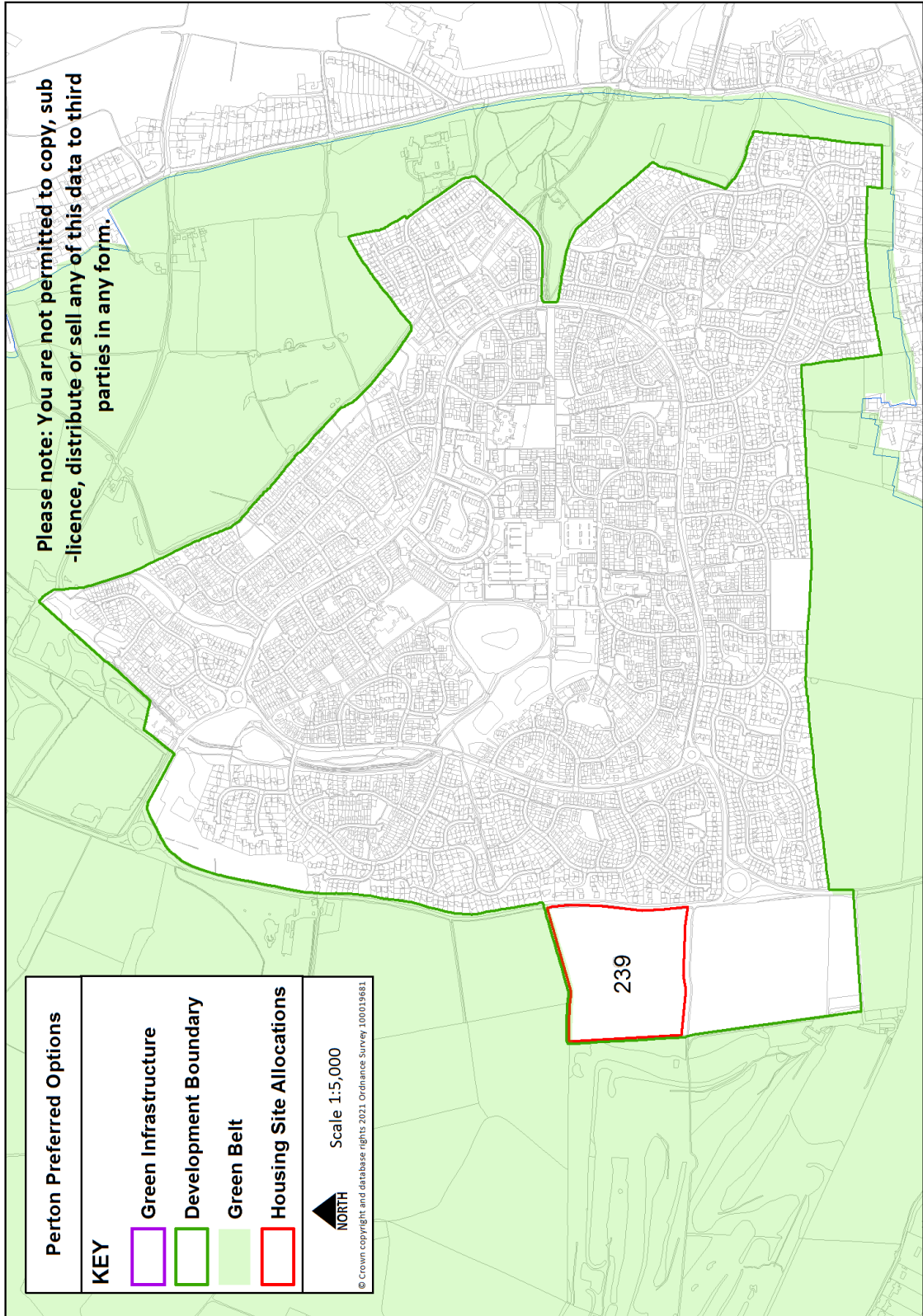
Site reference	274	Village	Kinver
Minimum capacity	38 dwellings consented on allocated site (20/00621/OUT) alongside minimum 82 dwellings on safeguarded land	Address	Land south of White Hill
Site area	5.5 ha	Proposed use	Housing



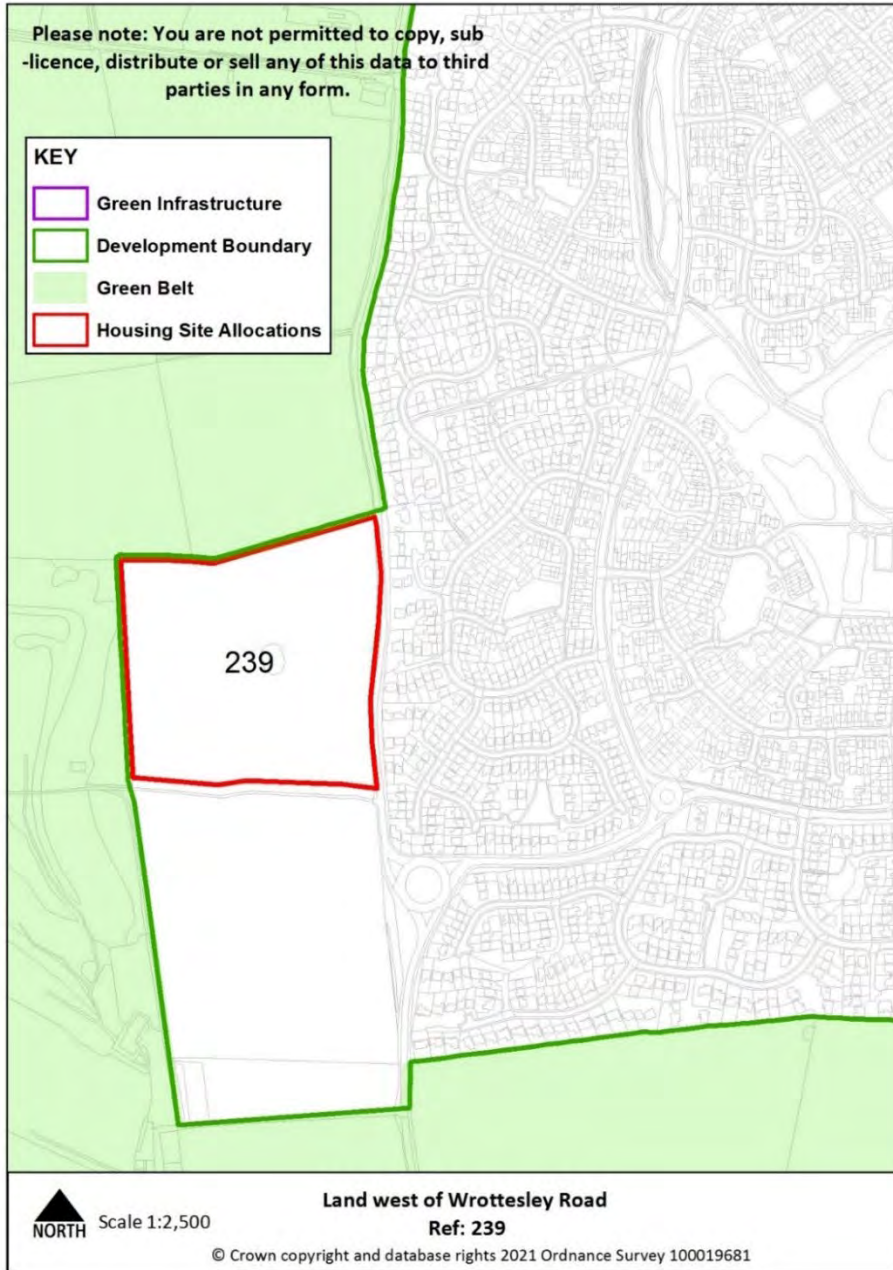
Key requirements	<ul style="list-style-type: none"> • Retention and integration of existing Public Rights of Way • Any historic environment mitigation for the site, as identified in the council’s Historic Environment Site Assessment Stage 2 (2022), including maintaining key views of Kinver Edge and Holy Austin Rock from the north-east corner of the site adjacent to White Hill and any mitigation required as a result of archaeological investigations • Any relevant policy requirements including affordable housing, open space,
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	education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.
Proposed access/active Travel measures	Provide vehicular and pedestrian access via White Hill.

Perton



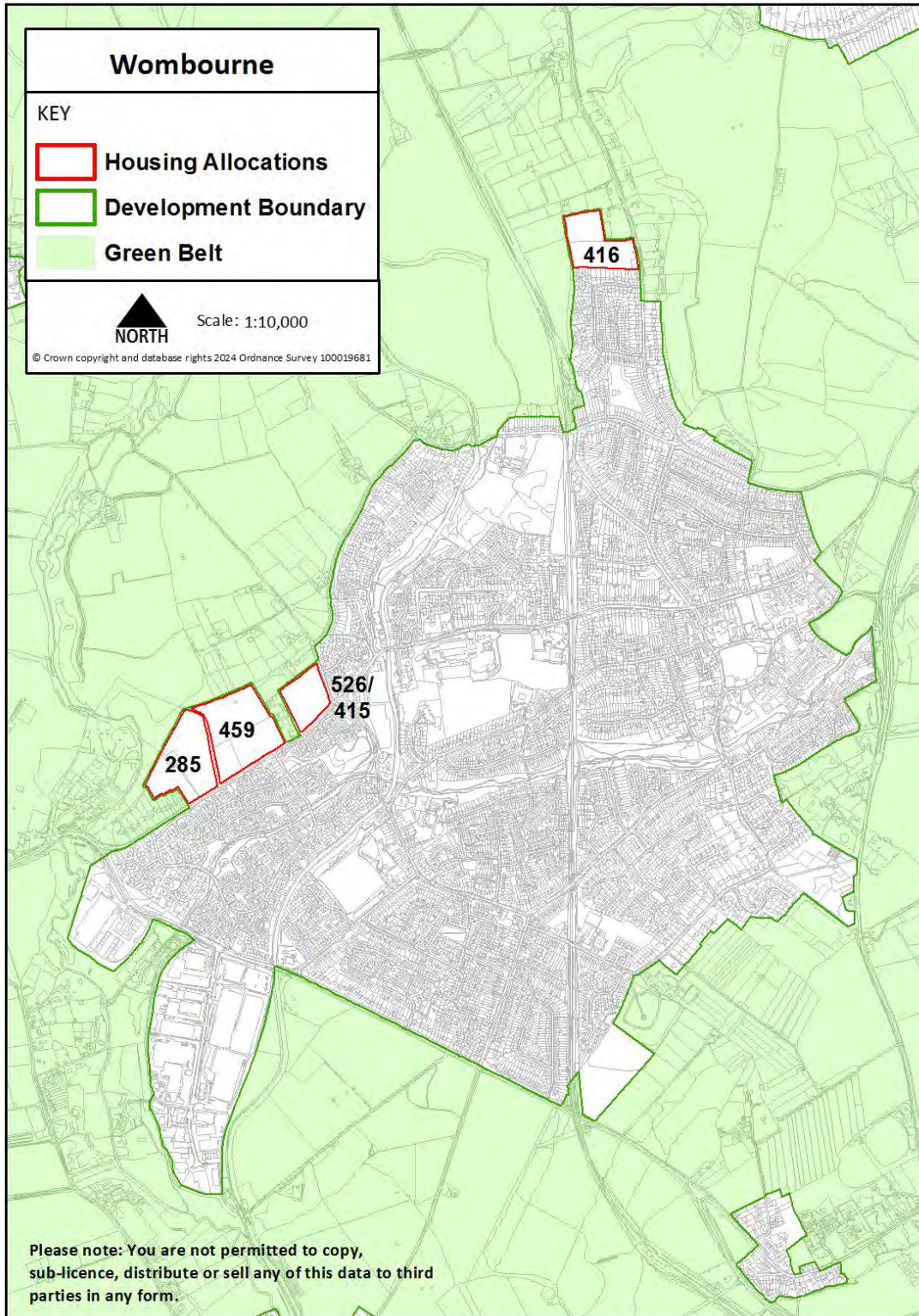
Site reference	239	Village	Perton
Minimum capacity	150 dwellings	Address	Land west of Wrottesley Park Road (south)
Site area	7.2 ha	Proposed use	Housing



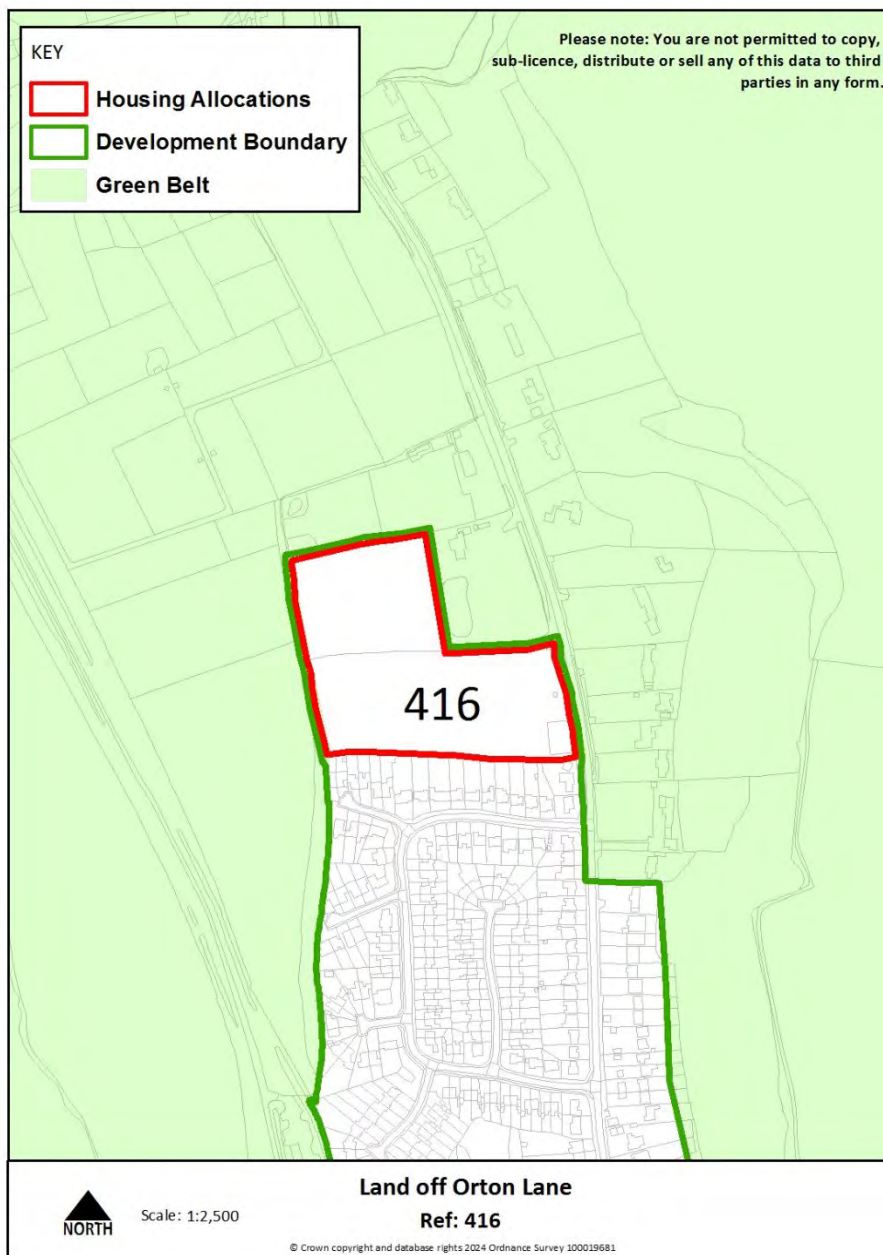
Key requirements	<ul style="list-style-type: none"> The tree and hedgerow boundaries that border the site should be retained with the boundary on the northern edge of the site strengthened Any historic environment mitigation for the site, as identified in the council’s Historic Environment Site Assessment Stage 2 (2022), including mitigation required as a result of archaeological investigations In addition to any other sustainable transport mitigation, delivery any necessary junction improvements to A41/Wrottesley Park Road
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	<ul style="list-style-type: none">Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.
Proposed access/active travel measures	Provide vehicular and pedestrian access via Wrottesley Park Road and pedestrian access into neighbouring allocated site.

Wombourne



Site Reference	416	Village	Wombourne
Minimum capacity	57 dwellings	Address	Land off Orton Lane
Site area	2.8ha	Proposed Use	Housing

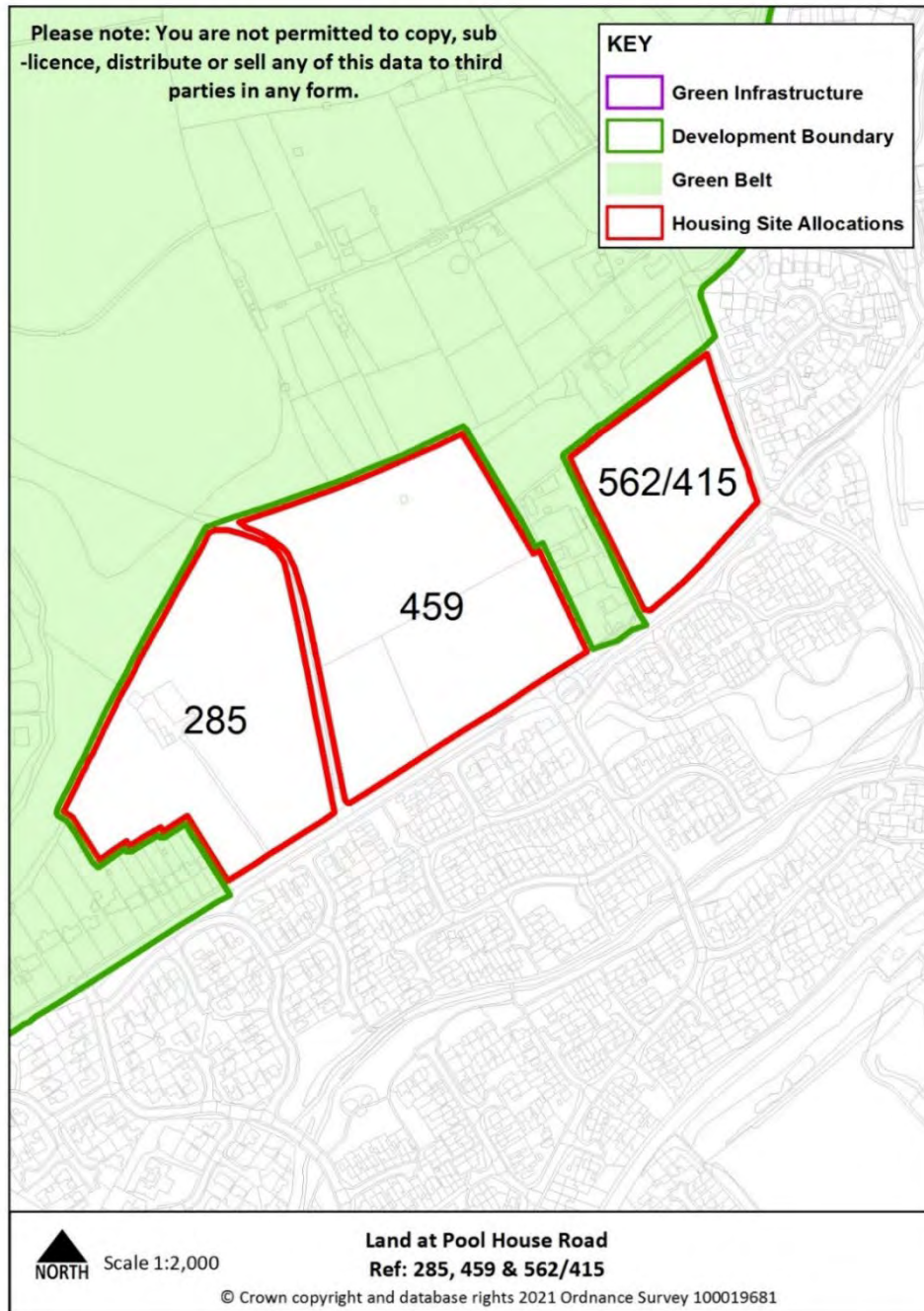


Key requirements

- Any historic environment mitigation for the site, as identified in the council’s Historic Environment Site Assessment Stage 2 (2022), including retaining and enhancing tree and hedgerow planting as far as possible throughout the site and designing the development to protect the character of the Canal Conservation Area and the Listed Buildings and Structures which sit along it. Also deliver any mitigation required as a result of archaeological investigations.
- Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate

	change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.
Proposed access/active travel measures	Provide vehicular and pedestrian access via Orton Lane, including extension of existing footway.

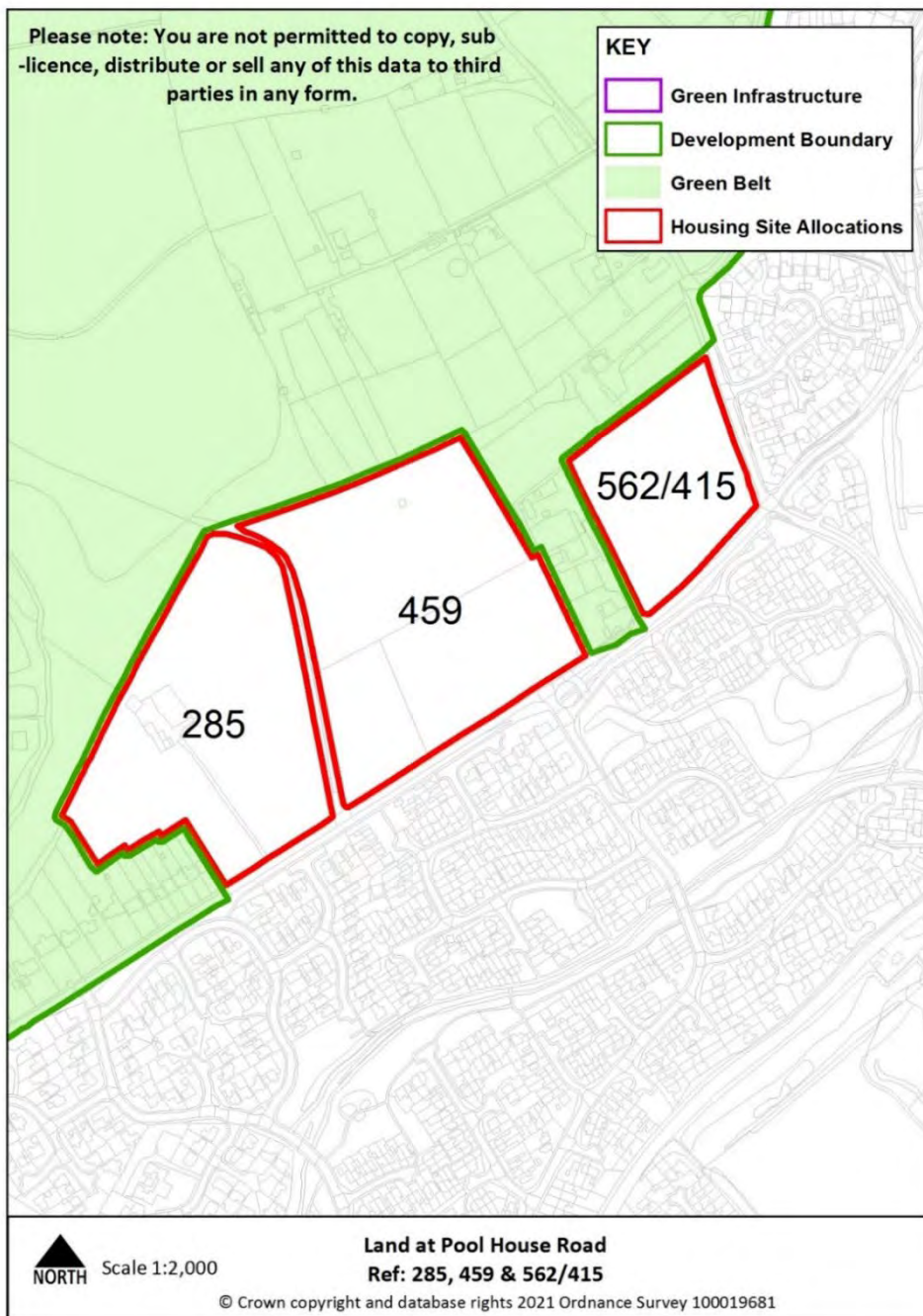
Site Reference	285	Village	Wombourne
Minimum capacity	82 dwellings	Address	Land off Pool House Road
Site area	3.9ha	Proposed Use	Housing



Key requirements	<ul style="list-style-type: none"> • Provide highway and pedestrian connectivity to site 459. • Any historic environment mitigation for the site, as identified in the council's Historic Environment Site Assessment Stage 2 (2022), including retention and enhancement of tree and hedgerow boundaries bordering the site and any mitigation required as a result of archaeological investigations.
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	<ul style="list-style-type: none">• Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.
Proposed access/active travel measures	Provide vehicular access via Pool House Road. Provide walking, wheeling and cycling access onto and across Pool House Road, and contribute towards Staffordshire County Council’s proposed walking, wheeling and cycling improvements along Pool House Road and Ounsdale Road which will link this area to Wombourne village centre.

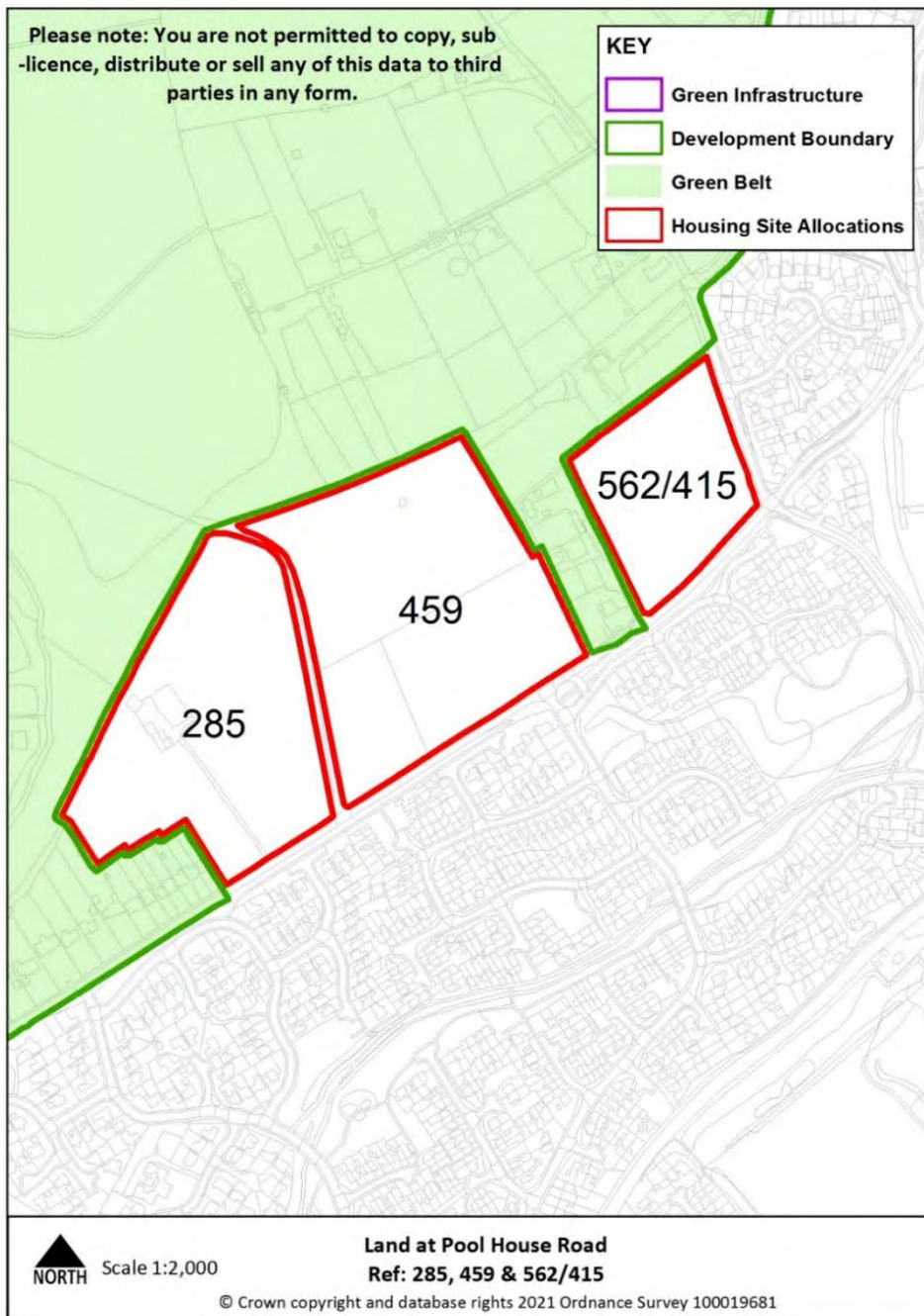
Site Reference	562/415	Village	Wombourne
Minimum capacity	44 dwellings	Address	Land off Pool House Road
Site area	1.9ha	Proposed Use	Housing



Key requirements	<ul style="list-style-type: none"> Any historic environment mitigation for the site, as identified in the council’s Historic Environment Site Assessment Stage 2 (2022), including retention and enhancement of tree and hedgerow boundaries bordering the site and any mitigation required as a result of archaeological investigations. Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport,
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	housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.
Proposed access/active travel measures	Provide vehicular access via Pool House Road. Provide walking, wheeling and cycling access onto and across Pool House Road, and contribute towards Staffordshire County Council’s proposed walking, wheeling and cycling improvements along Pool House Road and Ounsdale Road which will link this area to Wombourne village centre.

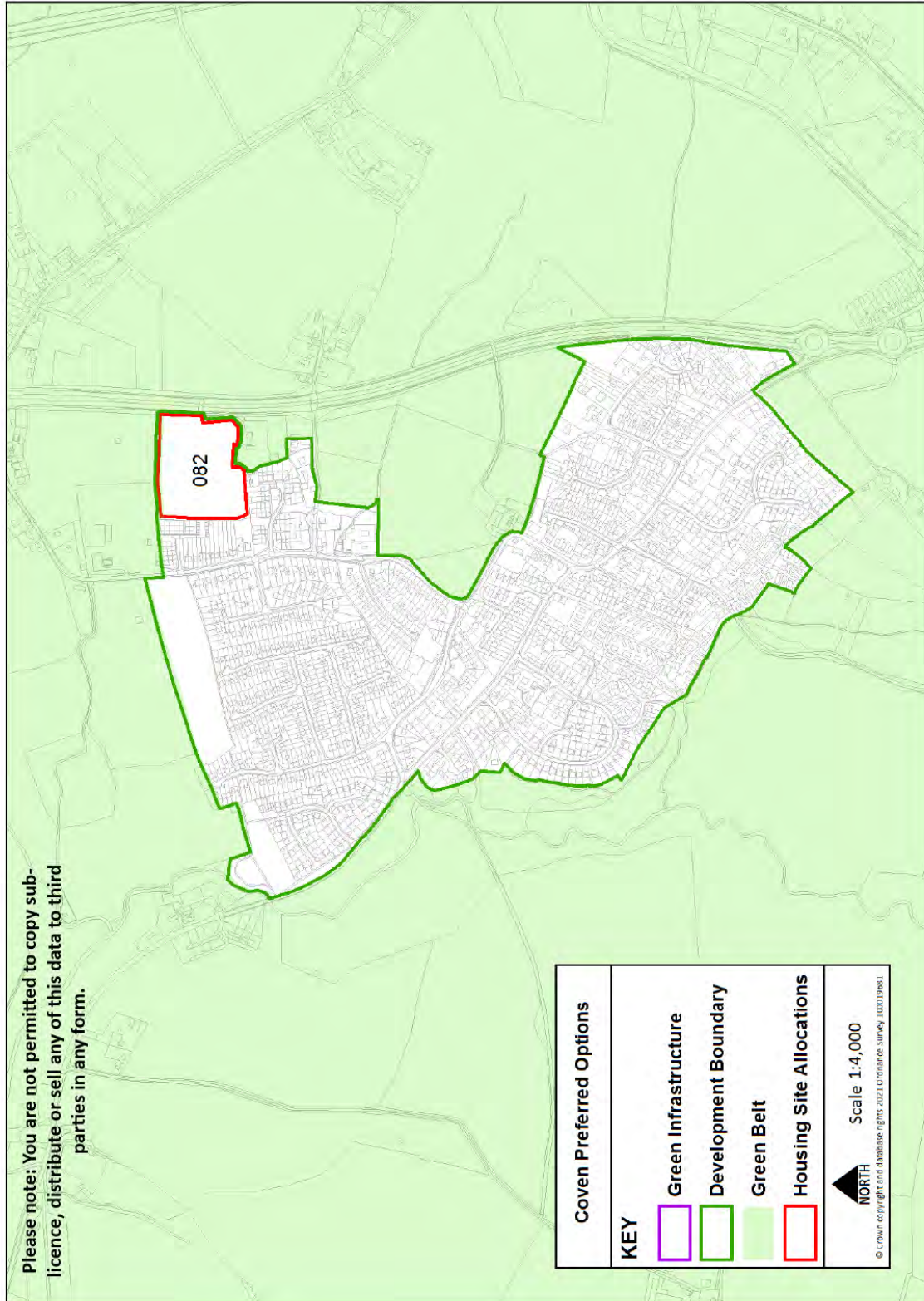
Site Reference	459	Village	Wombourne
Minimum capacity	97 dwellings	Address	Land off Pool House Road
Site area	4.6ha	Proposed Use	Housing



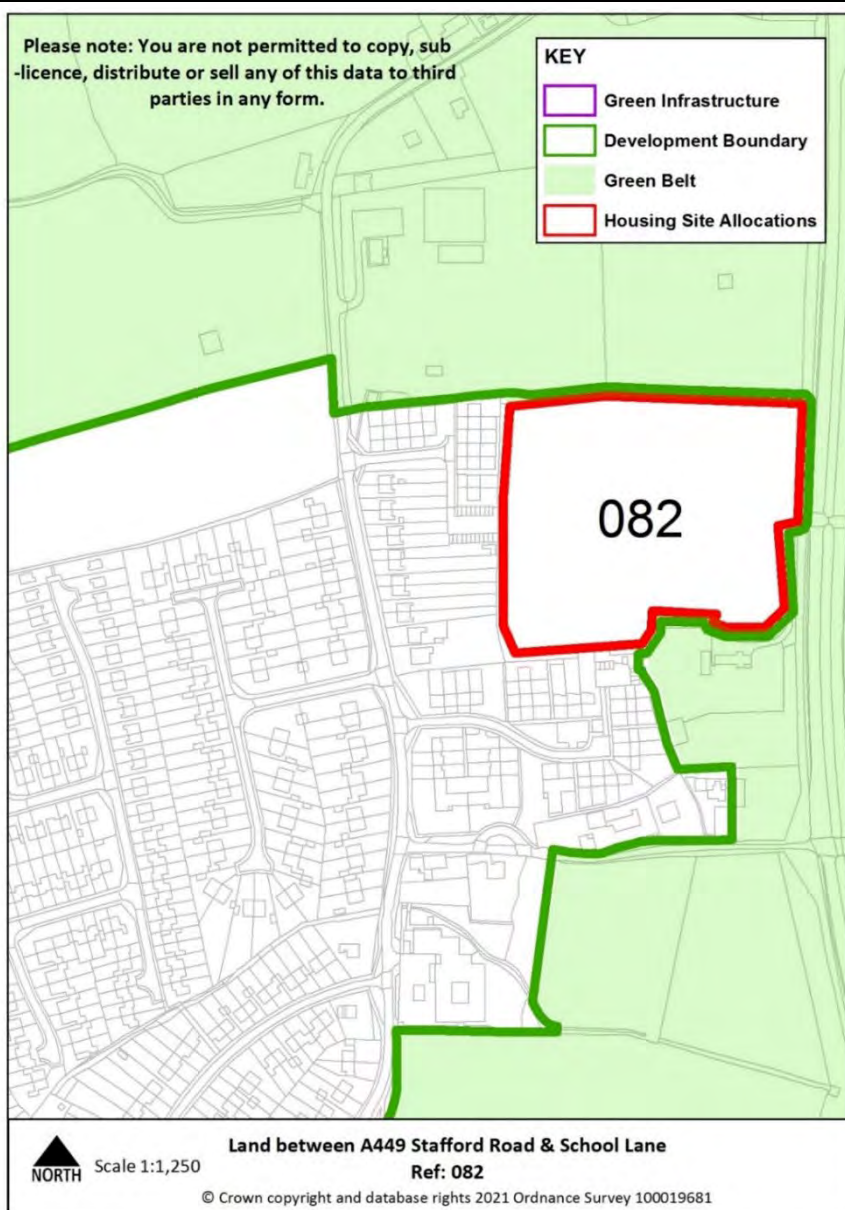
Key requirements	<ul style="list-style-type: none"> • Provide highway and pedestrian connectivity to site 285. • Any historic environment mitigation for the site, as identified in the council’s Historic Environment Site Assessment Stage 2 (2022), including retention and enhancement of tree and hedgerow boundaries bordering the site and any mitigation required as a result of archaeological
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	<p>investigations.</p> <ul style="list-style-type: none"> • Strengthen the landscape boundary on the northern edge of the site • Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.
Proposed access/active travel measures	Provide vehicular access via Pool House Road. Provide walking, wheeling and cycling access onto and across Pool House Road, and contribute towards Staffordshire County Council’s proposed walking, wheeling and cycling improvements along Pool House Road and Ounsdale Road which will link this area to Wombourne village centre.

Tier 3 Coven



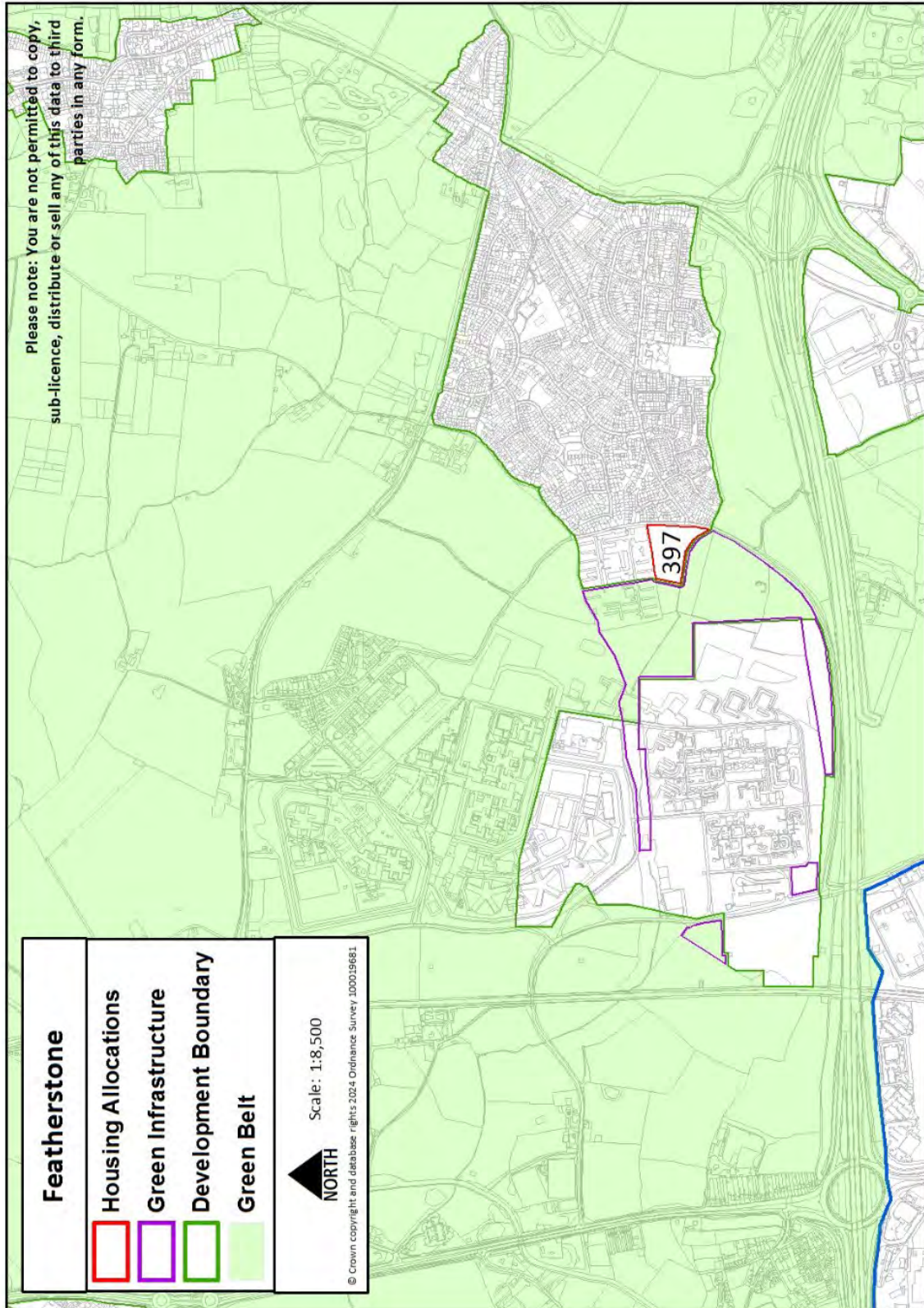
Site reference	082	Village	Coven
Minimum capacity	48 dwellings	Address	Land between A449 Stafford Road & School Lane
Site area	2.3 ha	Proposed use	Housing



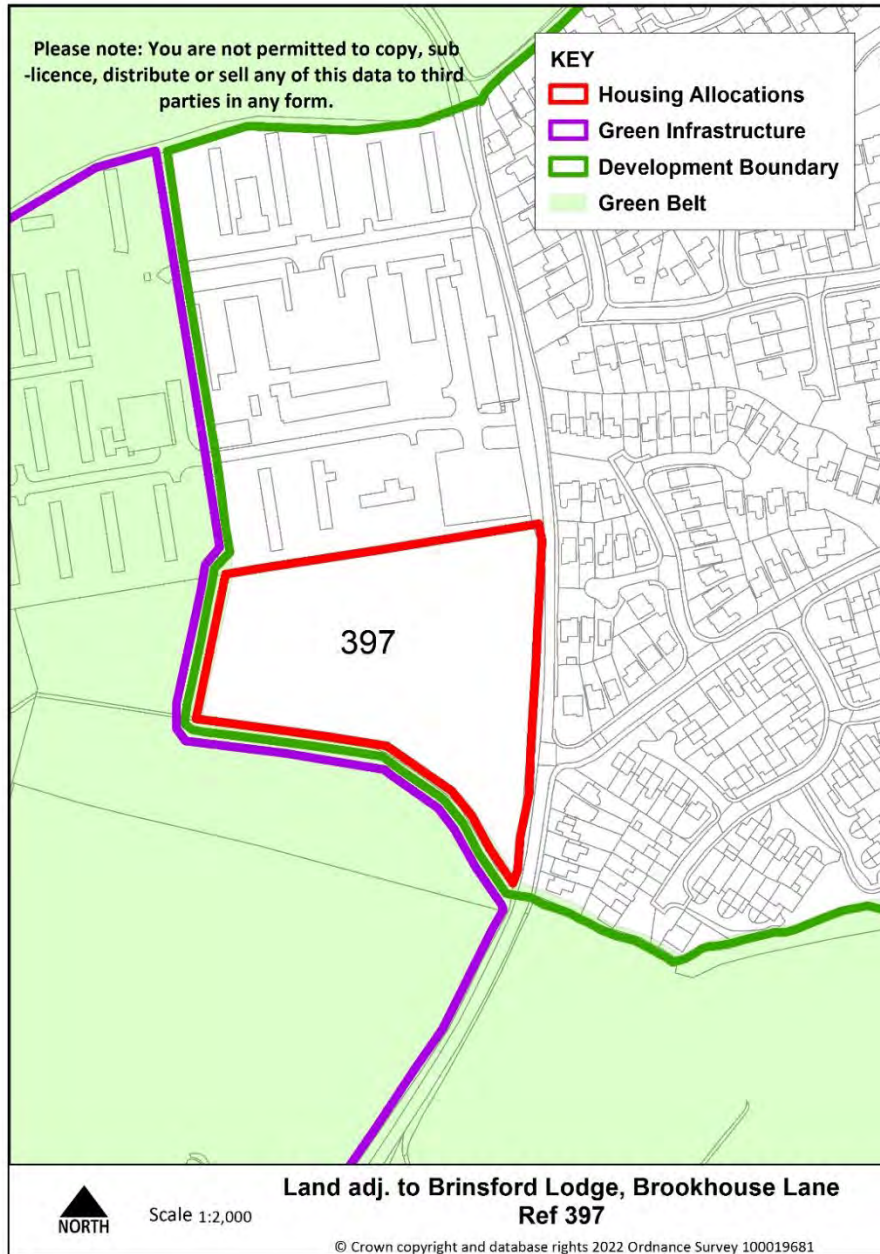
Key infrastructure requirements	<ul style="list-style-type: none"> • Provision to be made for replacement playing field land to ensure development results in no net loss of pitch provision • Any historic environment mitigation for the site, as identified in the council's Historic Environment Site Assessment Stage 2 (2022), including retention and enhancement of tree and hedgerow boundaries bordering the site to protect the historic landscape character and setting of heritage assets and any mitigation required as a result of archaeological investigations • Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure,
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	delivered in line with the relevant development plan policy standards.
Proposed access/active travel measures	Provide vehicular and pedestrian access via the playing fields off School Lane.

Featherstone



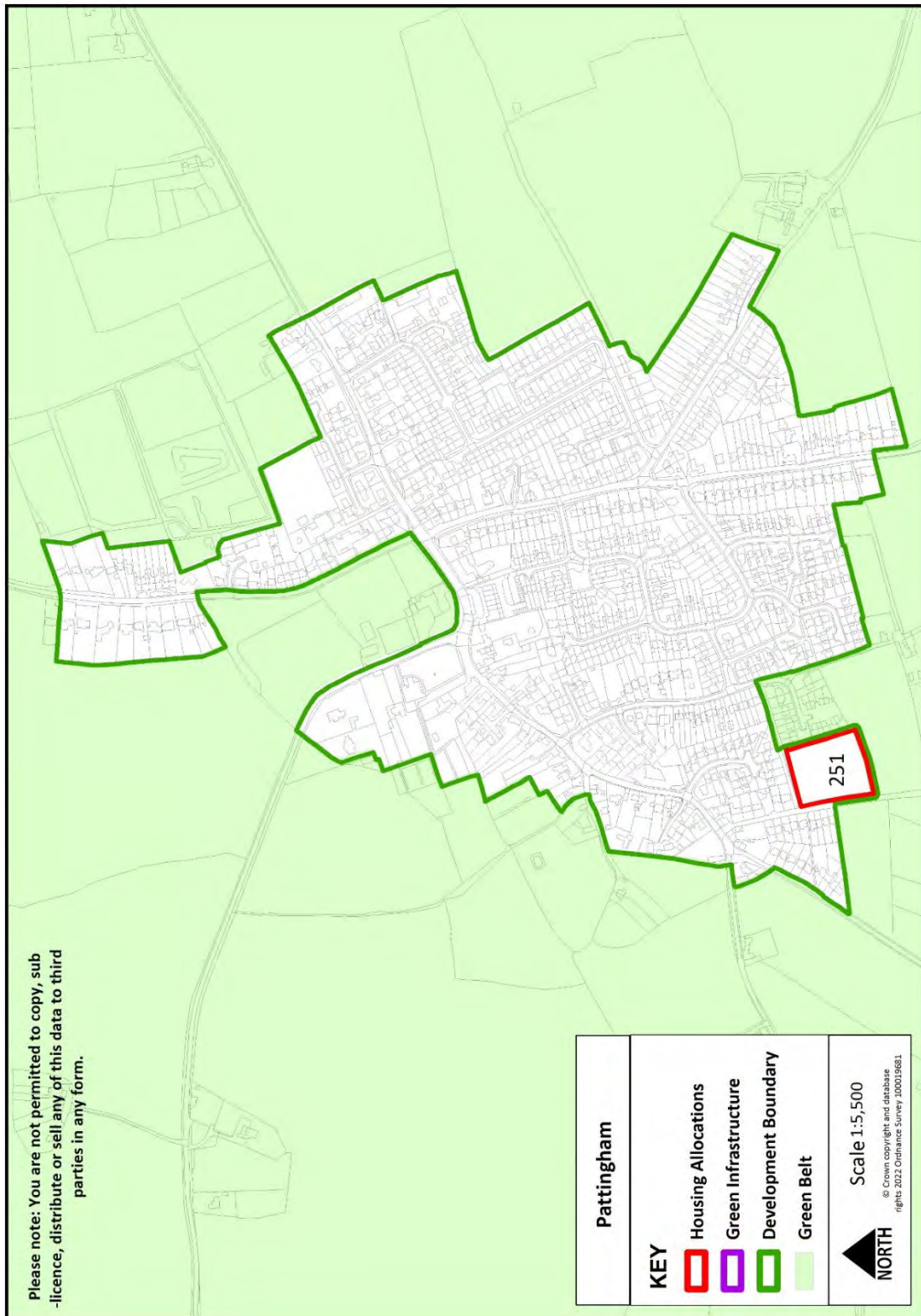
Site Reference	397	Village	Featherstone
Minimum capacity	35 dwellings	Address	Land adj. to Brookhouse Lane
Site area	1.6 ha	Proposed Use	Housing



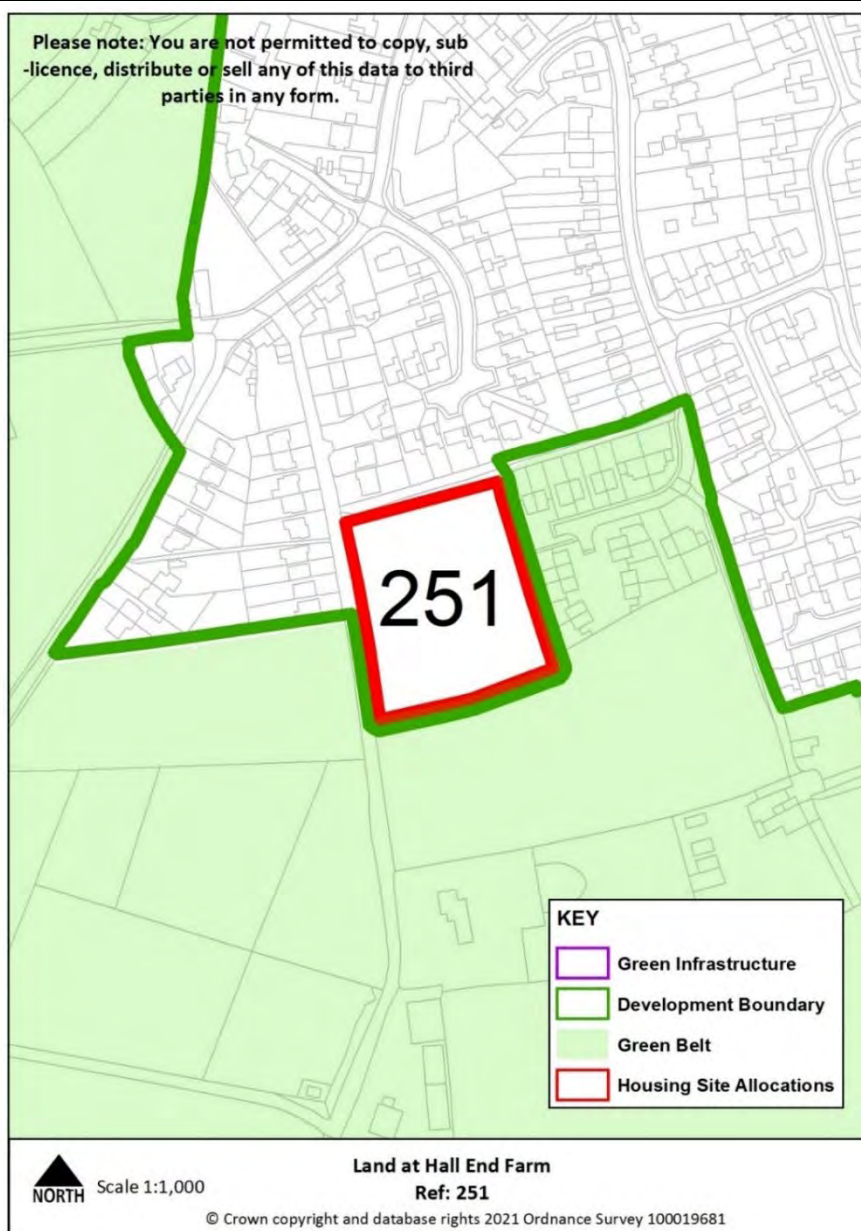
Key requirements	<ul style="list-style-type: none"> • Landscaping along the sites southern boundary to enhance the landscape character of the stream. • Any historic environment mitigation for the site, as identified in the council’s Historic Environment Site Assessment Stage 2 (2022), including any mitigation required as a result of archaeological investigations. • Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant
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	development plan policy standards.
Proposed access/active travel measures	Provide vehicular and pedestrian access via Malayan Way and into allocated site to the north.

Pattingham



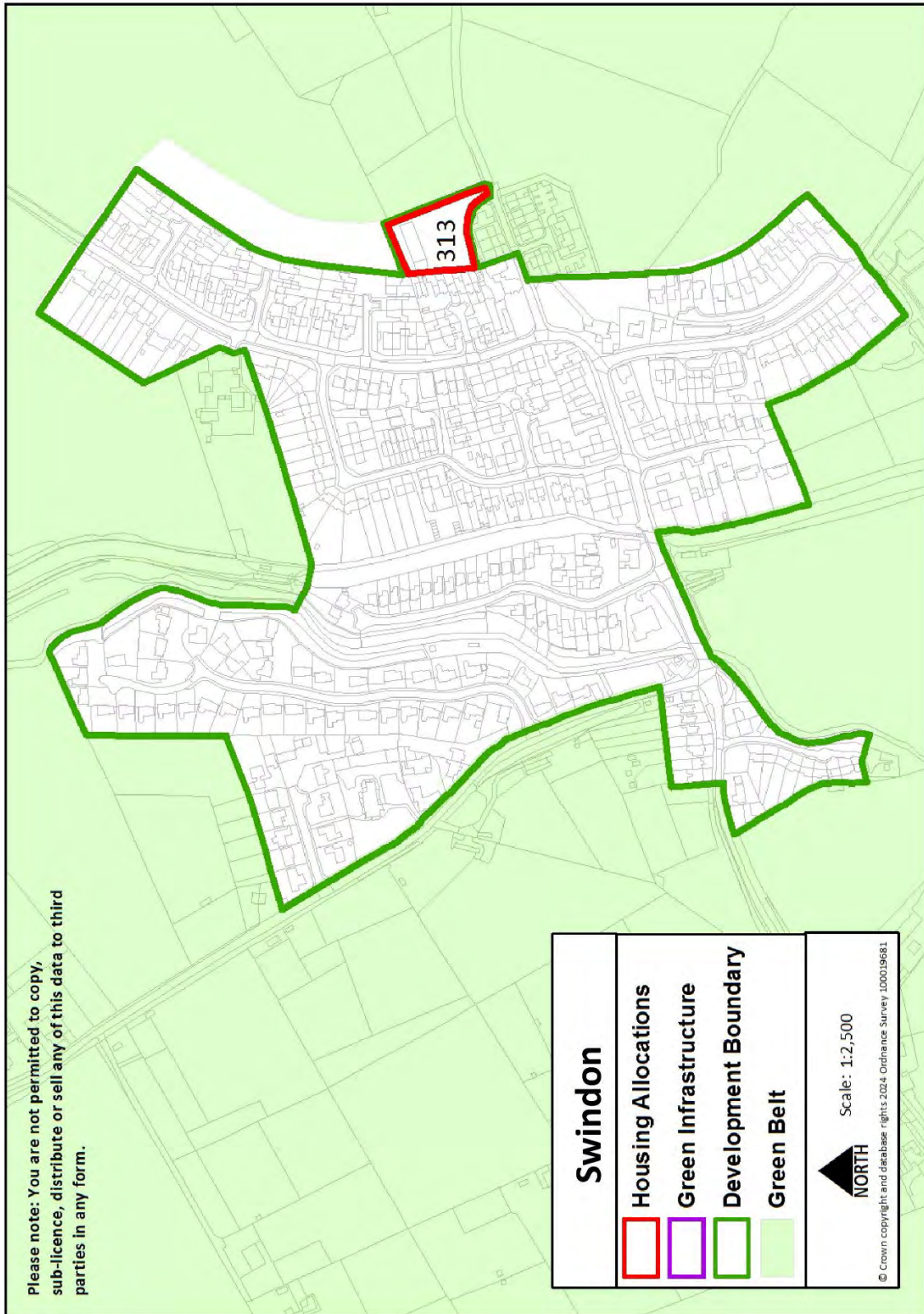
Site Reference	251	Village	Pattingham
Minimum capacity	17 dwellings	Address	Hall End Farm
Site area	0.8 ha	Proposed Use	Housing



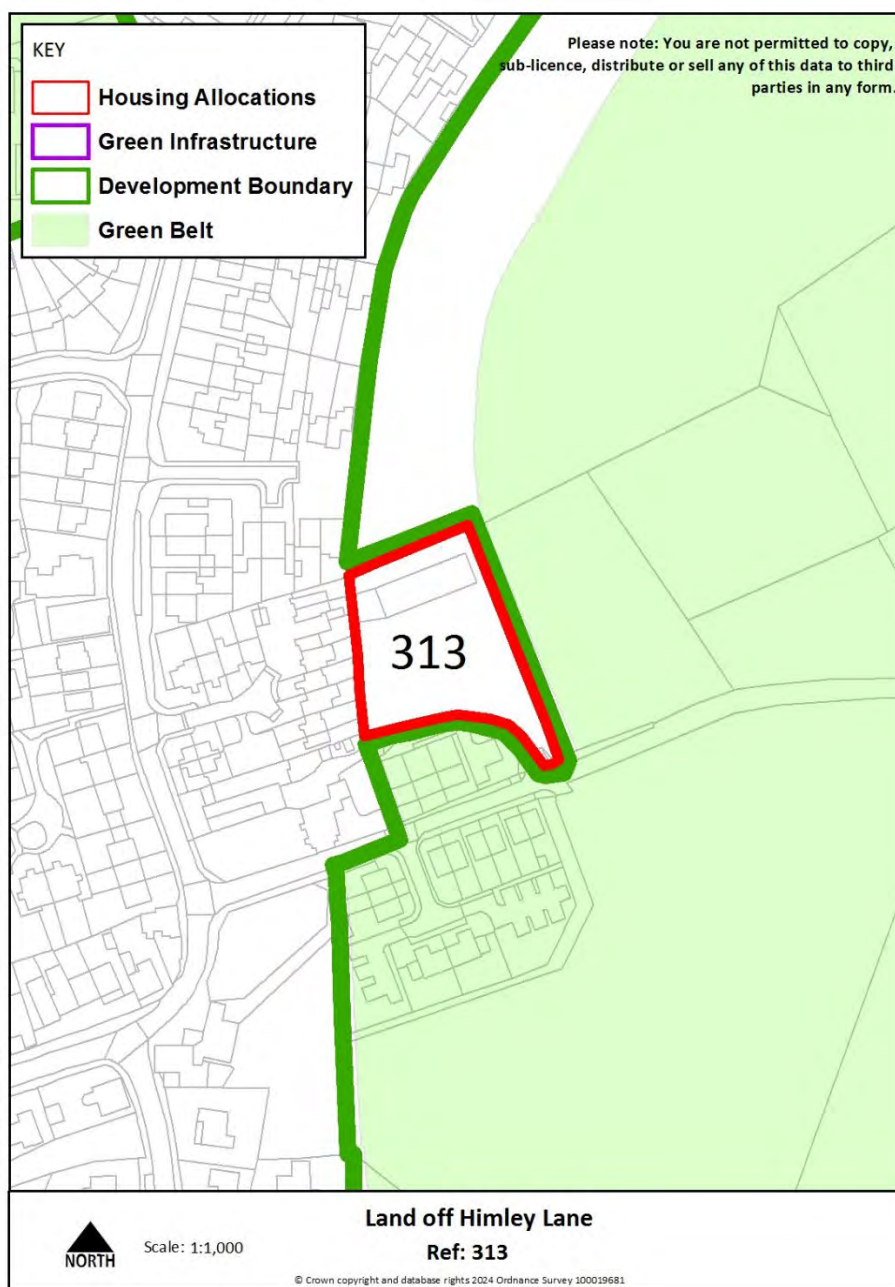
Key requirements	<ul style="list-style-type: none"> Any historic environment mitigation for the site, as identified in the council’s Historic Environment Site Assessment Stage 2 (2022), including retention and enhancement of tree and hedgerow boundaries bordering the site and any mitigation required as a result of archaeological investigations. Provide additional planting to enhance historic environment Any relevant development plan policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.
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Proposed access	Provide vehicular and pedestrian access to public highway via the adjacent rural exception site to the east
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Swindon



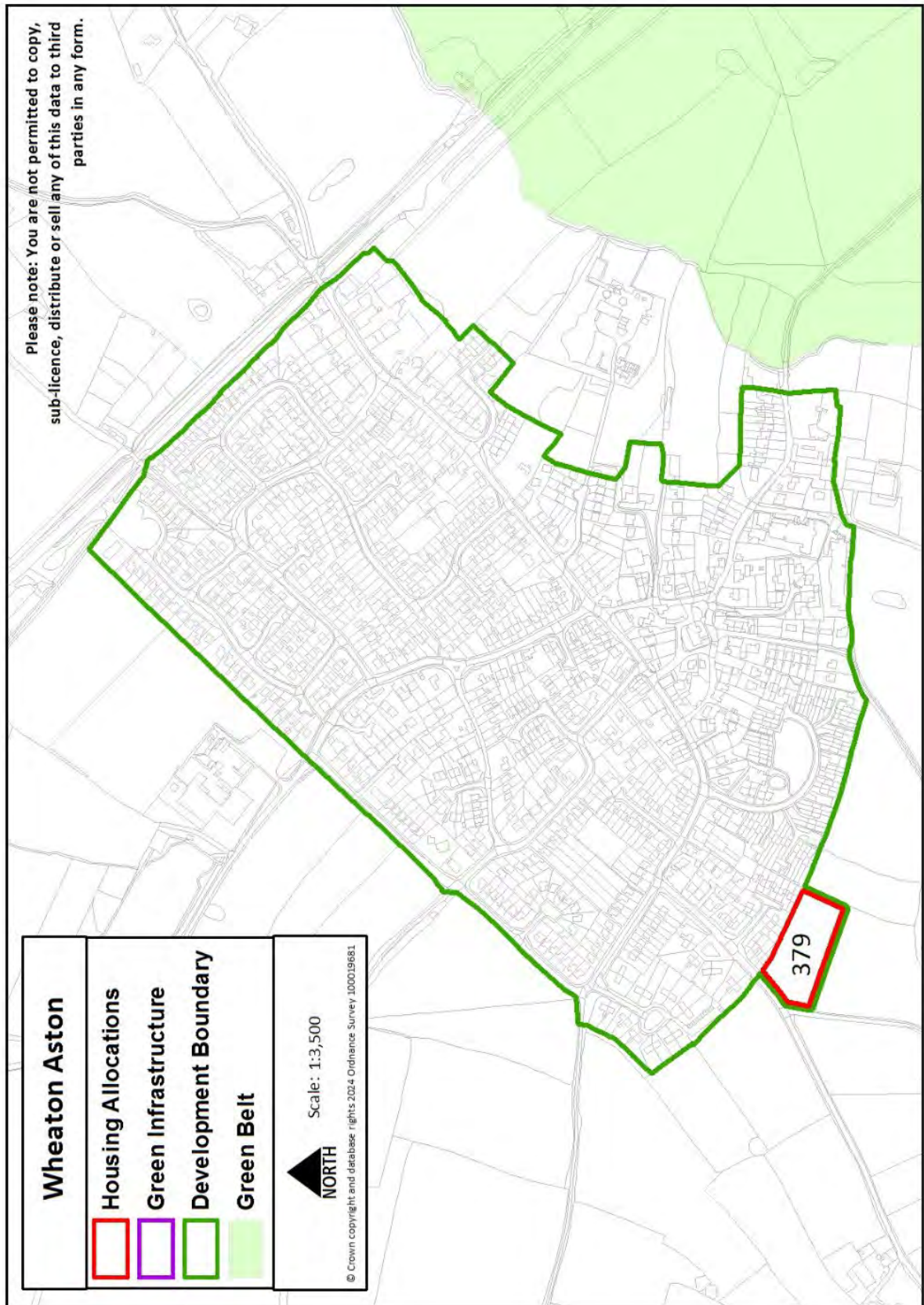
Site Reference	313	Village	Swindon
Approximate capacity	10 dwellings	Address	Land off Himley Lane
Site area	0.3ha	Proposed Use	Housing



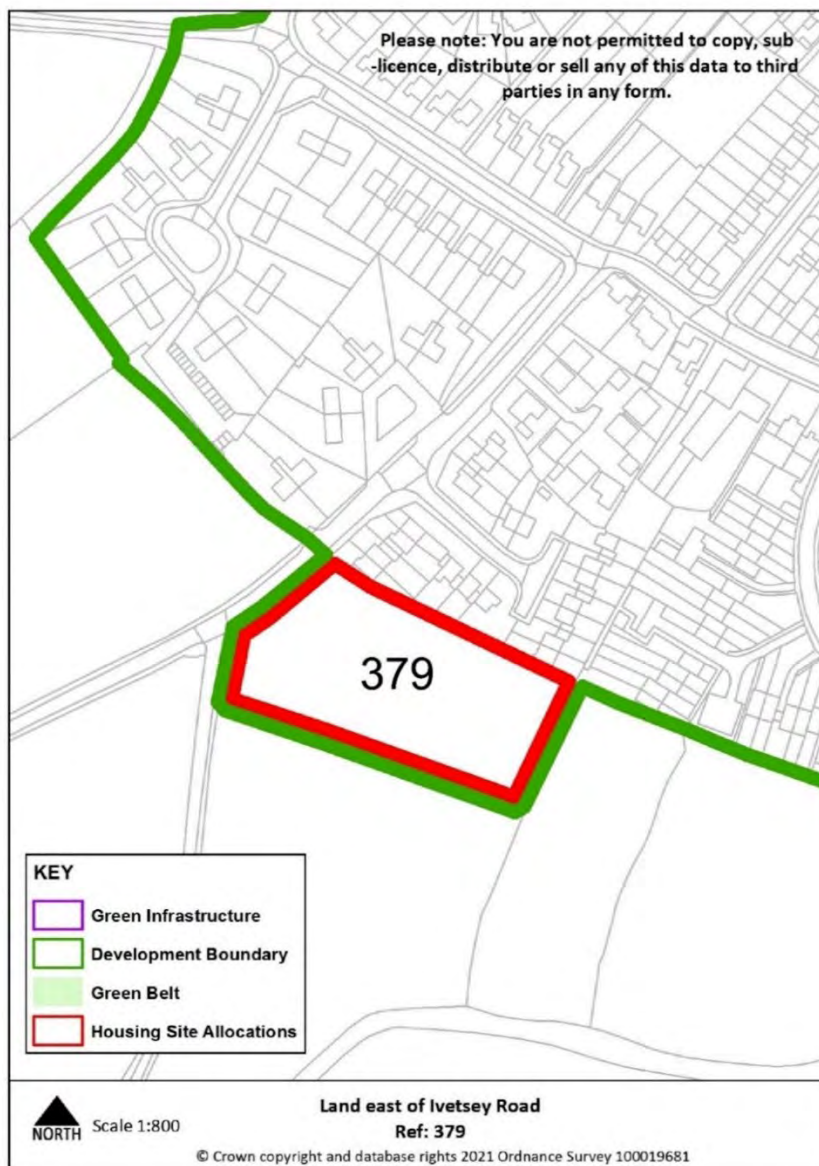
Key requirements	<ul style="list-style-type: none"> Any historic environment mitigation for the site, as identified in the council’s Historic Environment Site Assessment Stage 2 (2022), including retention and enhancement of tree and hedgerow boundaries bordering the site and any mitigation required as a result of archaeological investigations. Provide additional planting to enhance historic environment Any relevant development plan policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in
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	line with the relevant development plan policy standards.
Proposed access/active travel measures	Provide vehicular and pedestrian access via Himley Lane, including footway link to wider village.

Wheaton Aston



Site reference	379	Village	Wheaton Aston
Minimum capacity	18 dwellings	Address	Land off Ivetsey Road
Site area	0.8 ha	Proposed use	Housing



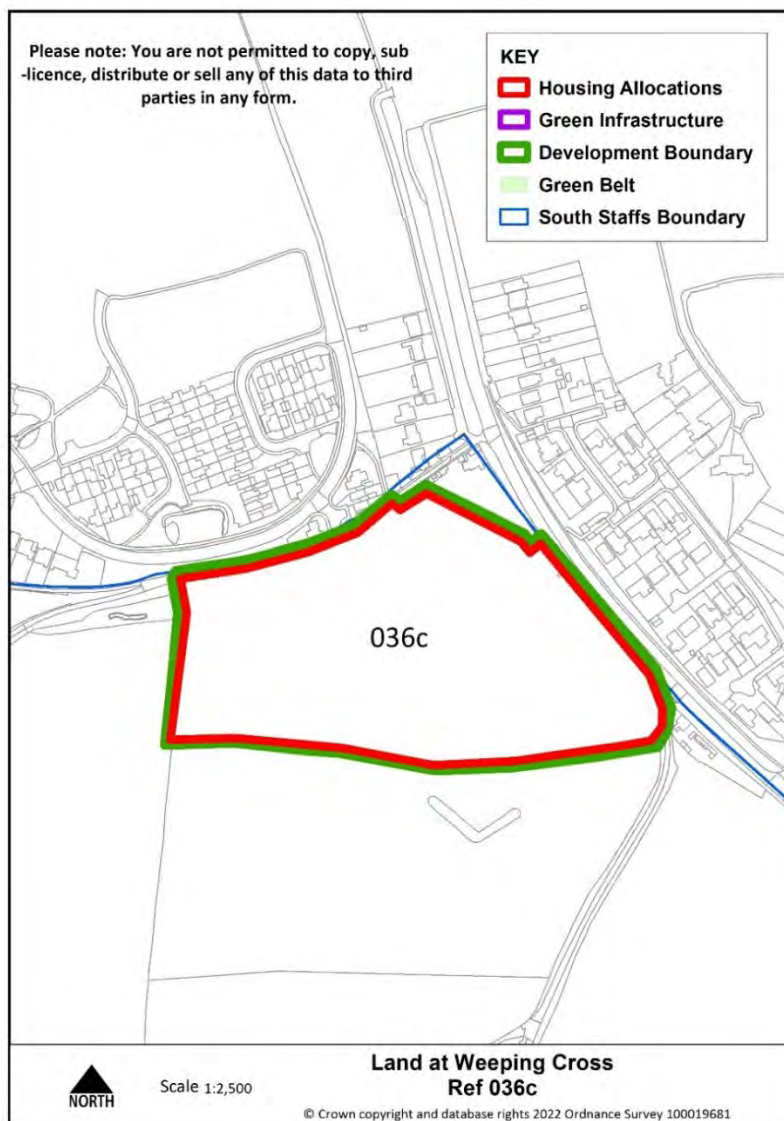
Key requirements

- A strong defensible boundary should be established along the southern edge of the site through additional planting.
- Any mitigation required as a result of archaeological investigations as identified in the council’s Historic Environment Site Assessment Stage 2 (2022).
- The hedge boundaries on the site should be retained as far as possible in line with the HESA - stage 2 (2022) requirements as they contribute positively to its local distinctiveness and in historic environment terms, reflect its former pastoral identity
- Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.

Proposed access/active travel measures	Provide vehicular and pedestrian access via Ivetsey Road, including extension of existing footway.
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Urban Extensions to Neighbouring Towns

Site reference	036c	Village	South of Stafford
Minimum capacity	81 dwellings	Address	Land at Weeping Cross (adjoining Stafford Borough boundary)
Site area	3.85 ha	Proposed use	Housing



Site requirements

- Any mitigation required in the council's Historic Environment Site Assessment Stage 2 (2022), including requirements regarding archaeological investigations, trees and hedgerows and the need for development to avoid higher elevations to the south of the site's southern border
- The tree and hedgerow boundaries that border the site should be retained with the boundaries to the west and south of the site, particularly on the southern elevation where a vegetated buffer must be provided to filter views of the development.
- Demonstrate measures taken to minimise light spillage to help conserve the darker skies of the AONB and reduce impacts on wildlife.
- Any relevant policy requirements including affordable housing, open

	space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.
Proposed access/active travel measures	Provide vehicular and pedestrian access via Cannock Road (A34) and deliver additional pedestrian and cycling links through to the existing Wildwood housing area.

Appendix D

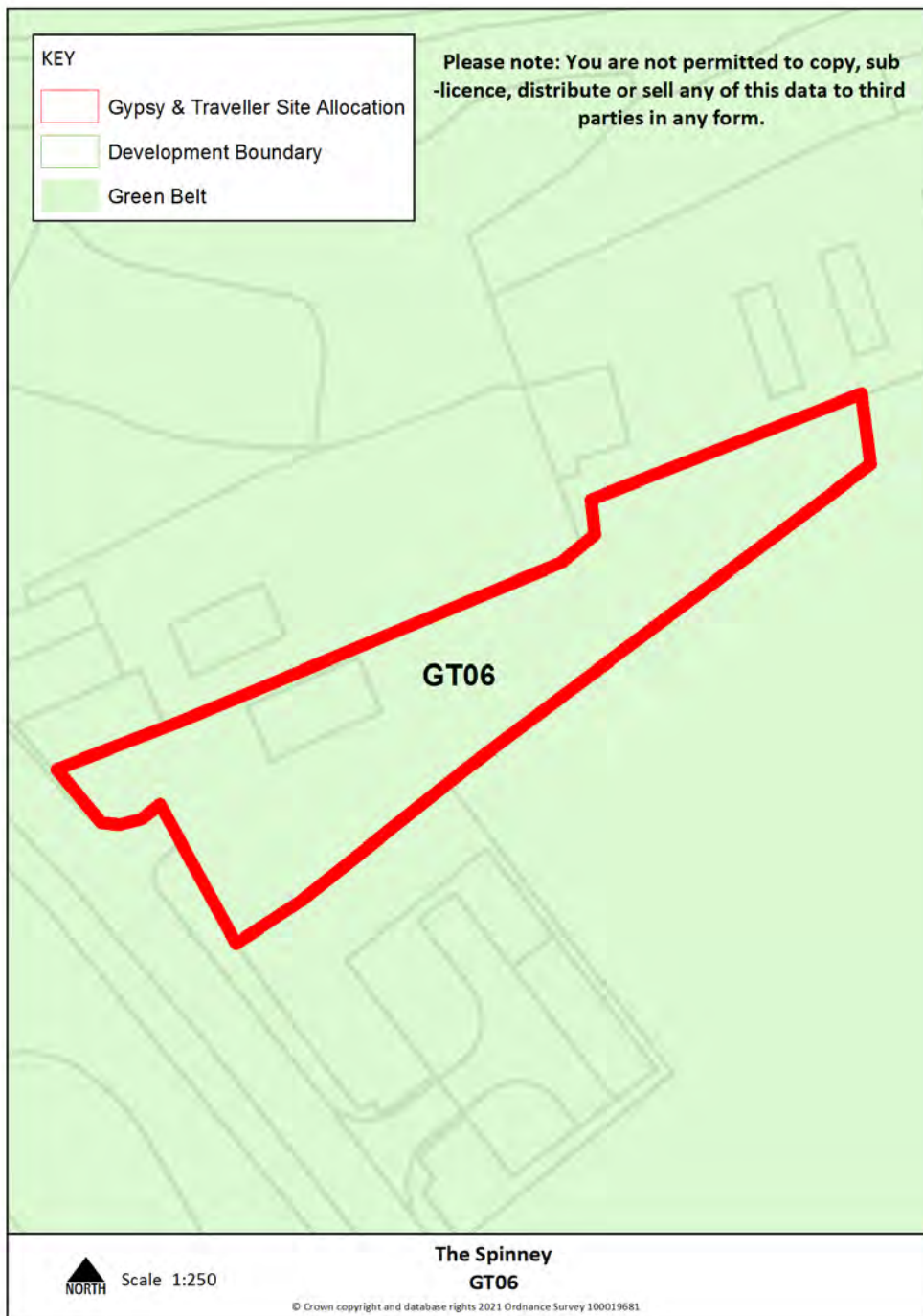
Gypsy and Traveller allocation maps and proformas

Site reference	GT01	Site name	New Acre Stables
No. authorised pitches (May/June 2021)	0	Address	Wolverhampton Road, Penkridge
Proposed allocation	4	Pitch need (2024-2028)	4
Site area (m2)	8280	Proposed use	Gypsy and traveller sites



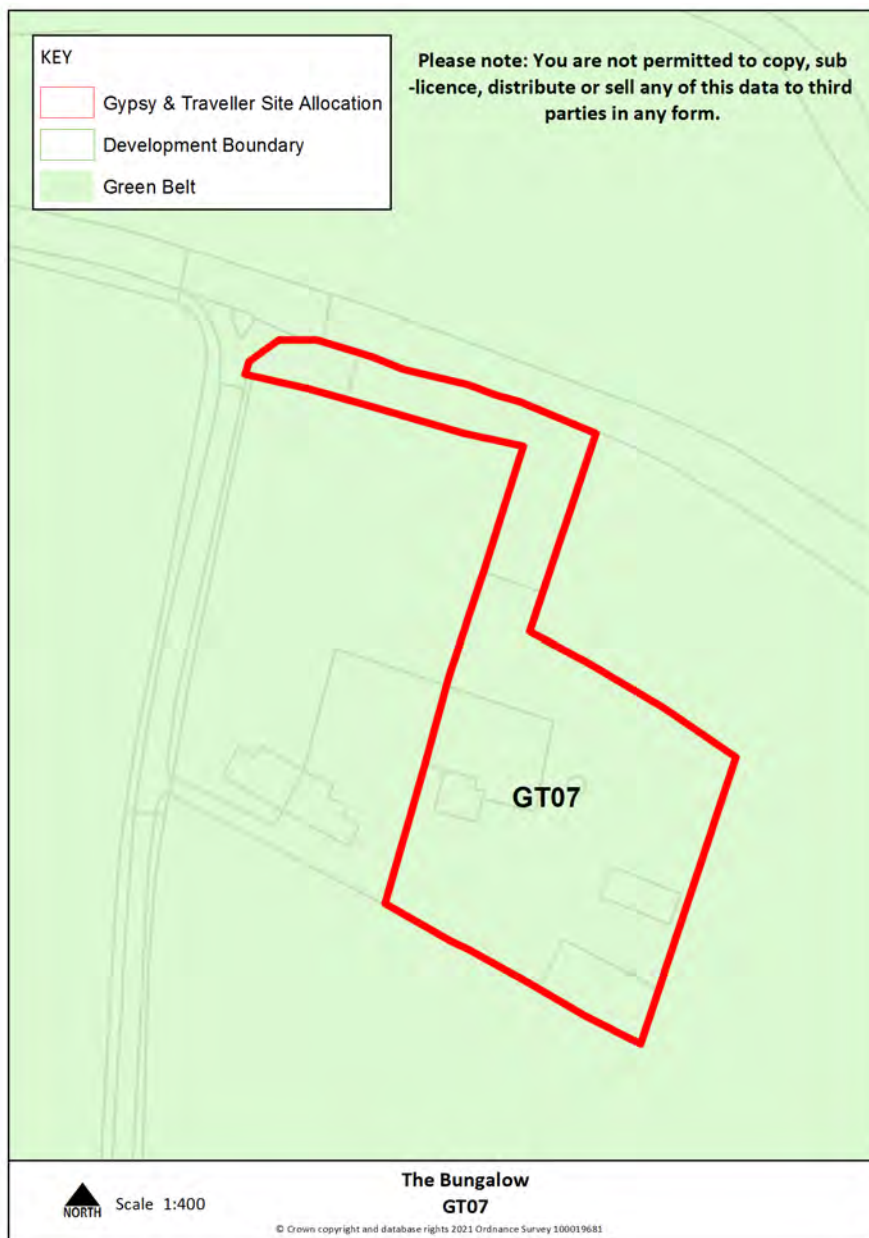
Key requirements	<ul style="list-style-type: none"> • The allocation should come forward in accordance with Policies SA4 and HC9 • The tree and hedgerow boundaries that border the site should be retained.
Proposed access	Provide vehicular and pedestrian access via Wolverhampton Road.

Site reference	GT06	Site name	The Spinney
No. authorised pitches	1	Address	Old Stafford Road, Slade Heath
Proposed allocation	2	Pitch need (2024-2028)	2
Site area (m2)	1365	Proposed use	Gypsy and traveller site



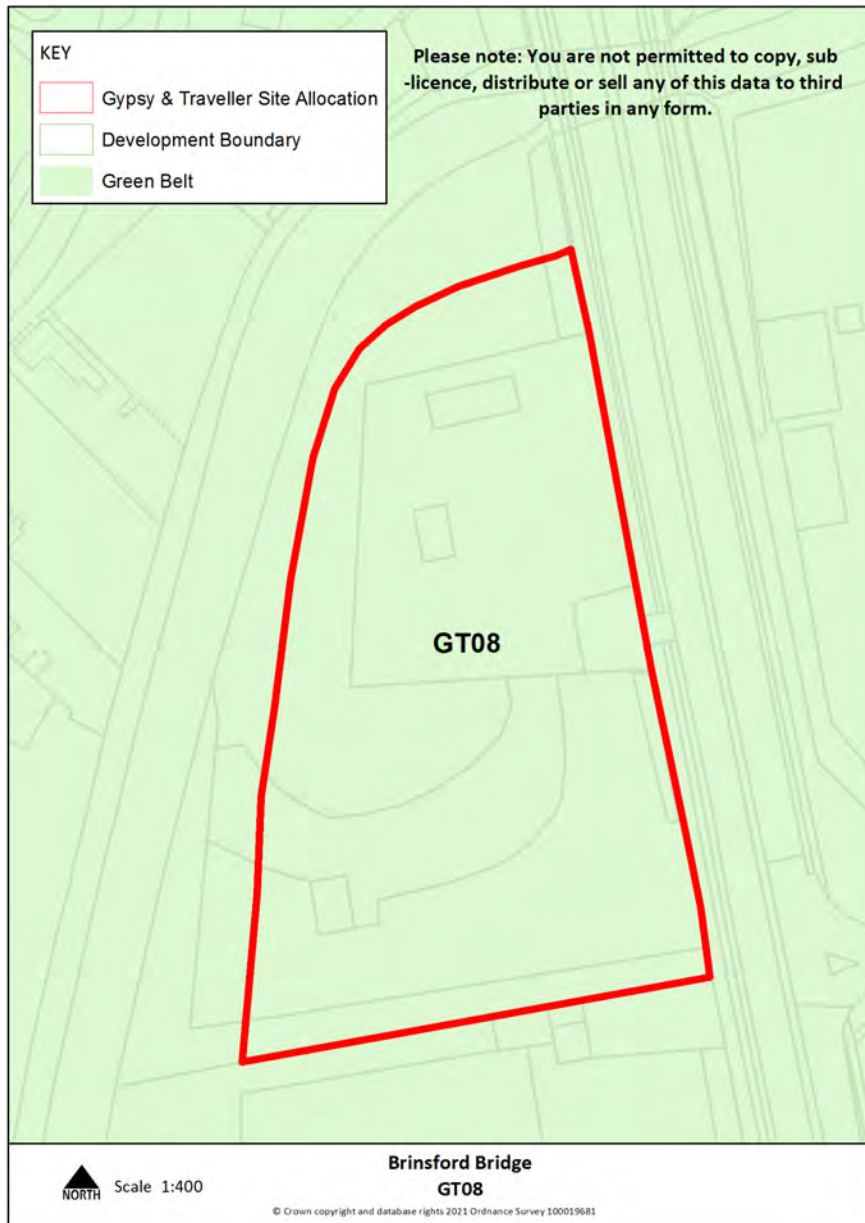
Key requirements	<ul style="list-style-type: none"> The allocation should come forward in accordance with Policies SA4 and HC9 The hedge around the site should be retained as far as possible
Proposed access	Provide vehicular and pedestrian access via Old Stafford Road.

Site reference	GT07	Site name	The Bungalow
No. authorised pitches	6	Address	Brewood Road, Rock Bank, Coven
Proposed allocation	3 additional pitches within site boundary. NB: 2 of these pitches have permission but are unimplemented	Pitch need (2024-2028)	5
Site area (m2)	3895	Proposed use	Gypsy and traveller sites



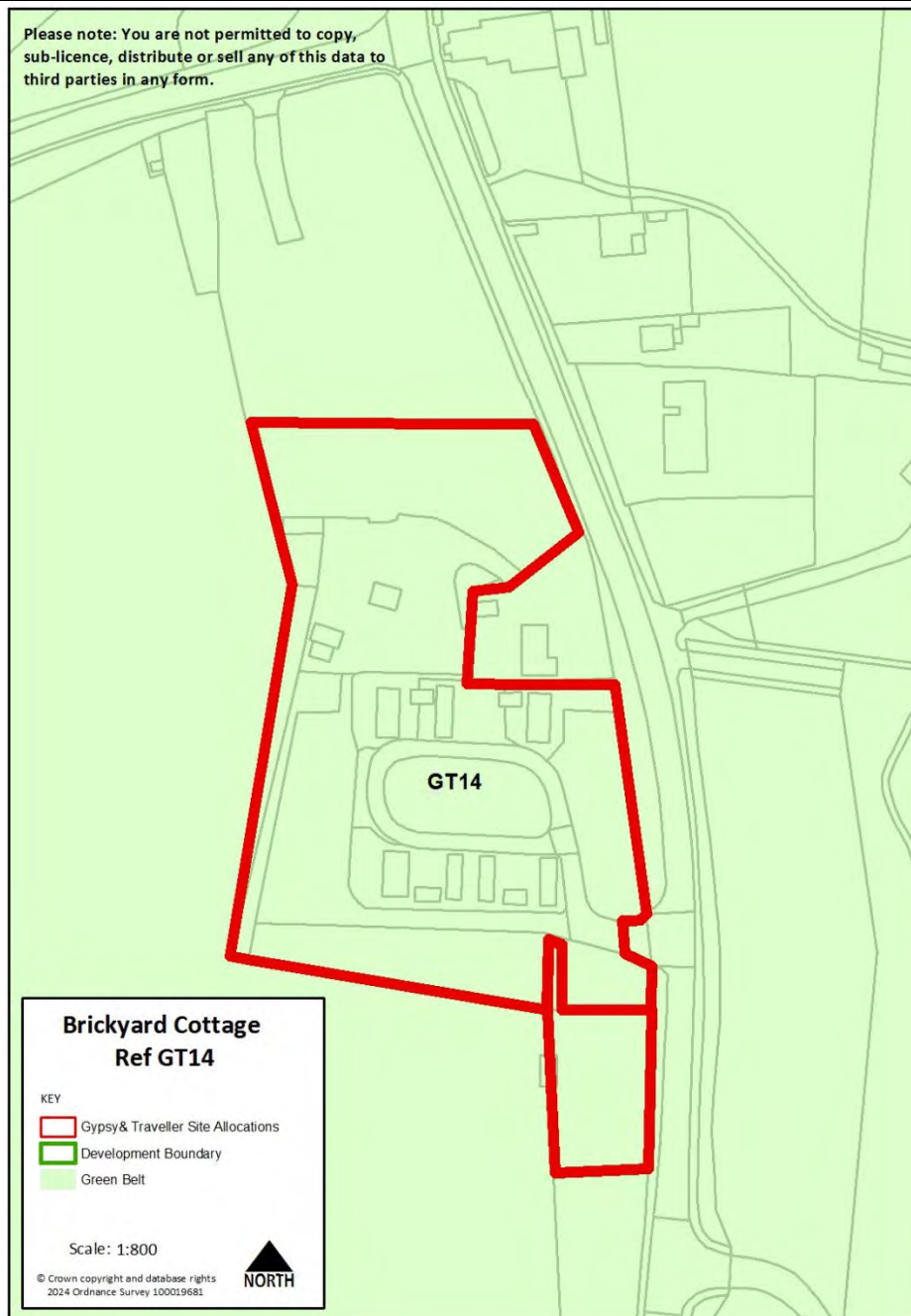
Key requirements	<ul style="list-style-type: none"> The allocation should come forward in accordance with Policies SA4 and HC9 The tree and hedgerow boundaries that border the site should be retained.
Proposed access	Provide vehicular and pedestrian access via Brewood Road.

Site reference	GT08	Site name	Brinsford Bridge
No. authorised pitches	2	Address	Stafford Road, Coven Heath
Proposed allocation	7	Pitch need (2024-2028)	7
Site area (m2)	8,695 (authorised), 2,870 (unauthorised)	Proposed use	Gypsy and traveller sites



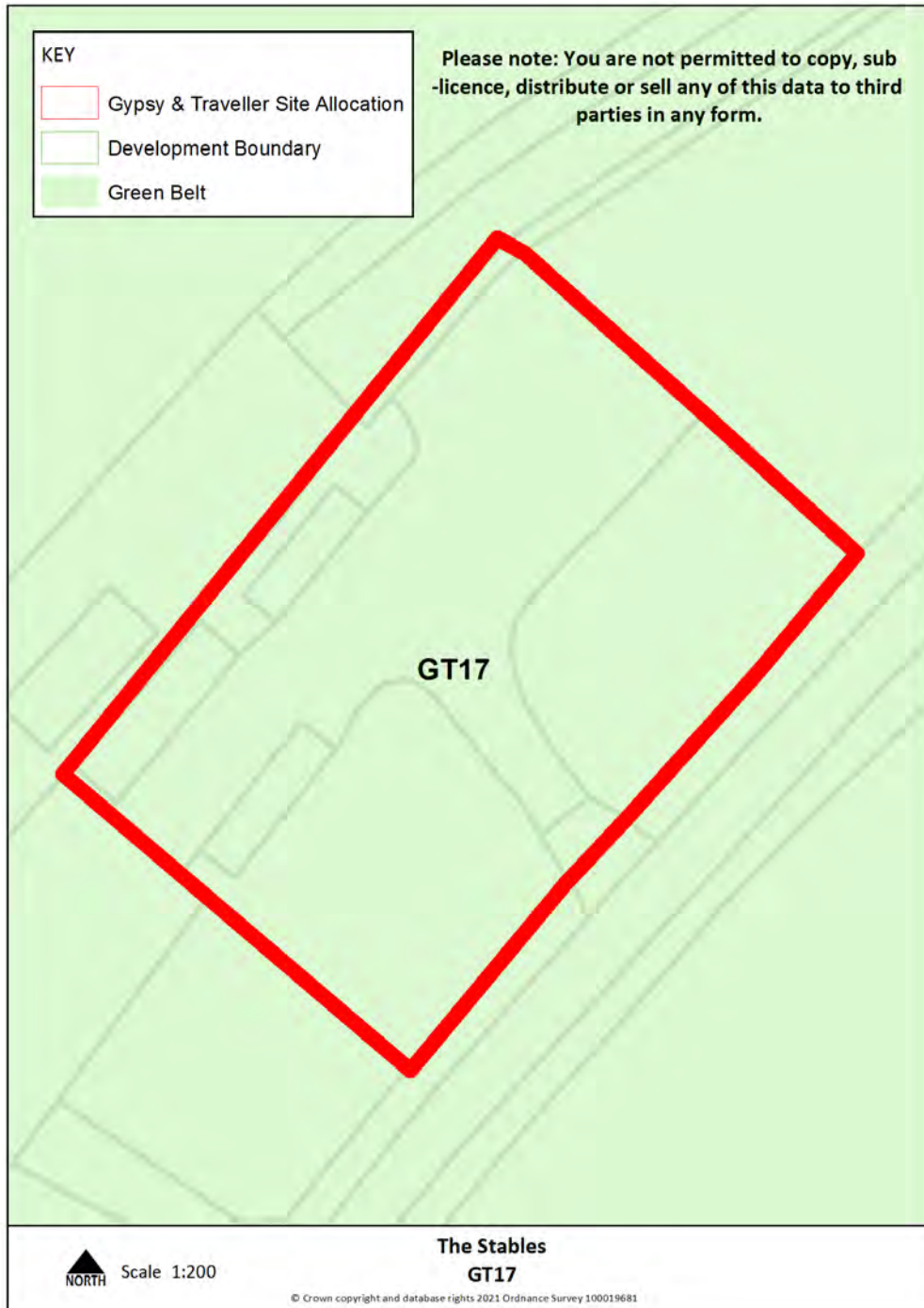
Key requirements	<ul style="list-style-type: none"> The allocation should come forward in accordance with Policies SA4 and HC9 A hedged boundary should be established along the canal bank to shield the site from the Canal Conservation Area in line with the HESA – stage 2 (2022) recommendations for the site. Additionally, the hedge boundary to the south of the site should be retained and enhanced.
Proposed access	Provide vehicular and pedestrian access via Stafford Road

Site reference	GT14	Site name	Brickyard Cottage
No. authorised pitches	10	Address	Land at Bursnips Road, Essington
Proposed allocation	4	Pitch need (2024-2028)	4
Site area (m2)	8530	Proposed use	Gypsy and traveller site



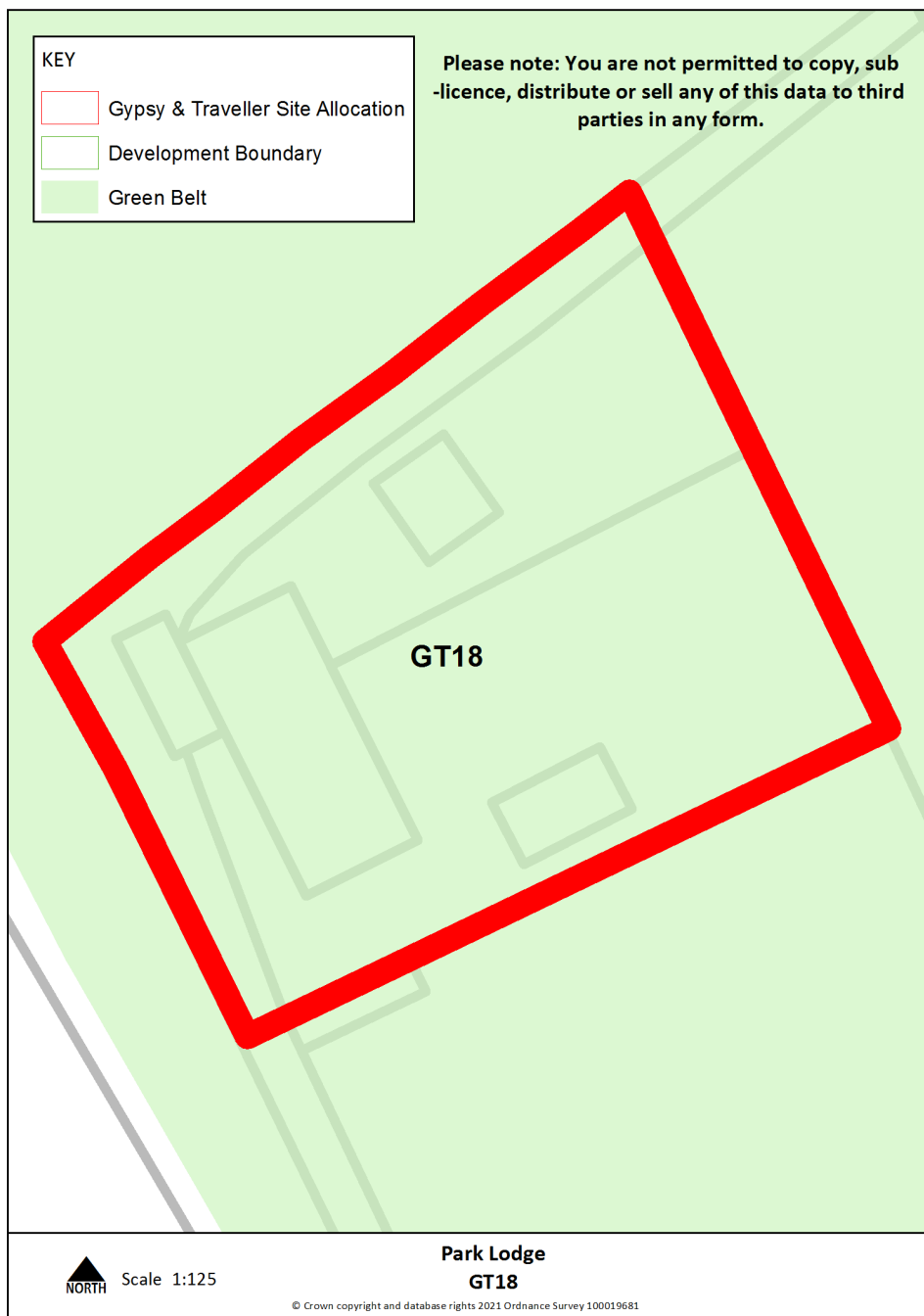
Key requirements	<ul style="list-style-type: none"> • The allocation should come forward in accordance with Policies SA4 and HC9 • The tree and hedgerow boundaries that border the site to be retained and enhanced
Proposed access	Provide vehicular and pedestrian access via Bursnips Road through Brickyard Cottage.

Site reference	GT17	Site name	The Stables
No. authorised pitches	4	Address	Old Landywood Lane, Upper Landywood,
Proposed allocation	3	Pitch need (2024-2028)	3
Site area (m2)	2375	Proposed use	Gypsy and traveller sites



Key requirements	<ul style="list-style-type: none"> The allocation should come forward in accordance with Policies SA4 and HC9 The hedgerow boundaries that border the site should be retained and enhanced, particularly the north-east boundary of the site.
Proposed access	Provide vehicular and pedestrian access via Old Landywood Lane.

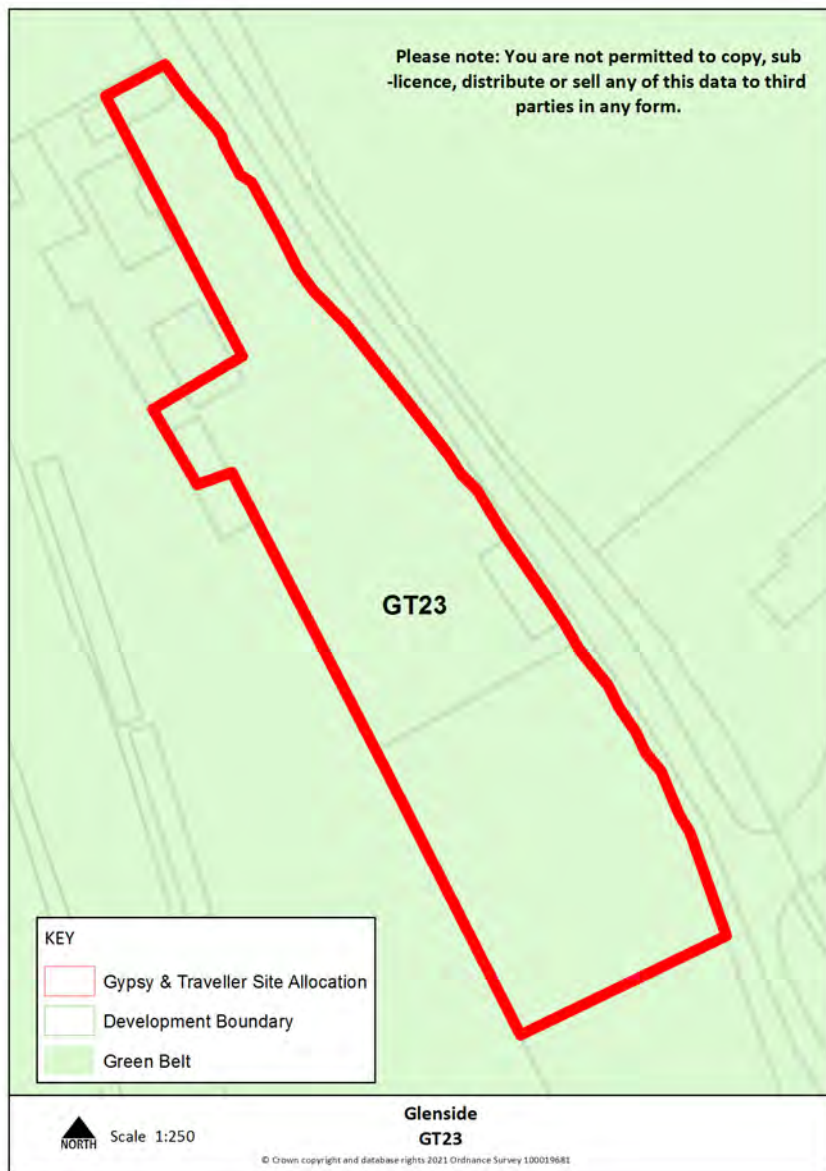
Site reference	GT18	Site name	Park Lodge
No. authorised pitches	0	Address	Pool House Road, Wombourne
Proposed allocation	2	Pitch need (2024-2028)	2
Site area (m2)	875	Proposed use	Gypsy and Traveller Site



Key requirements

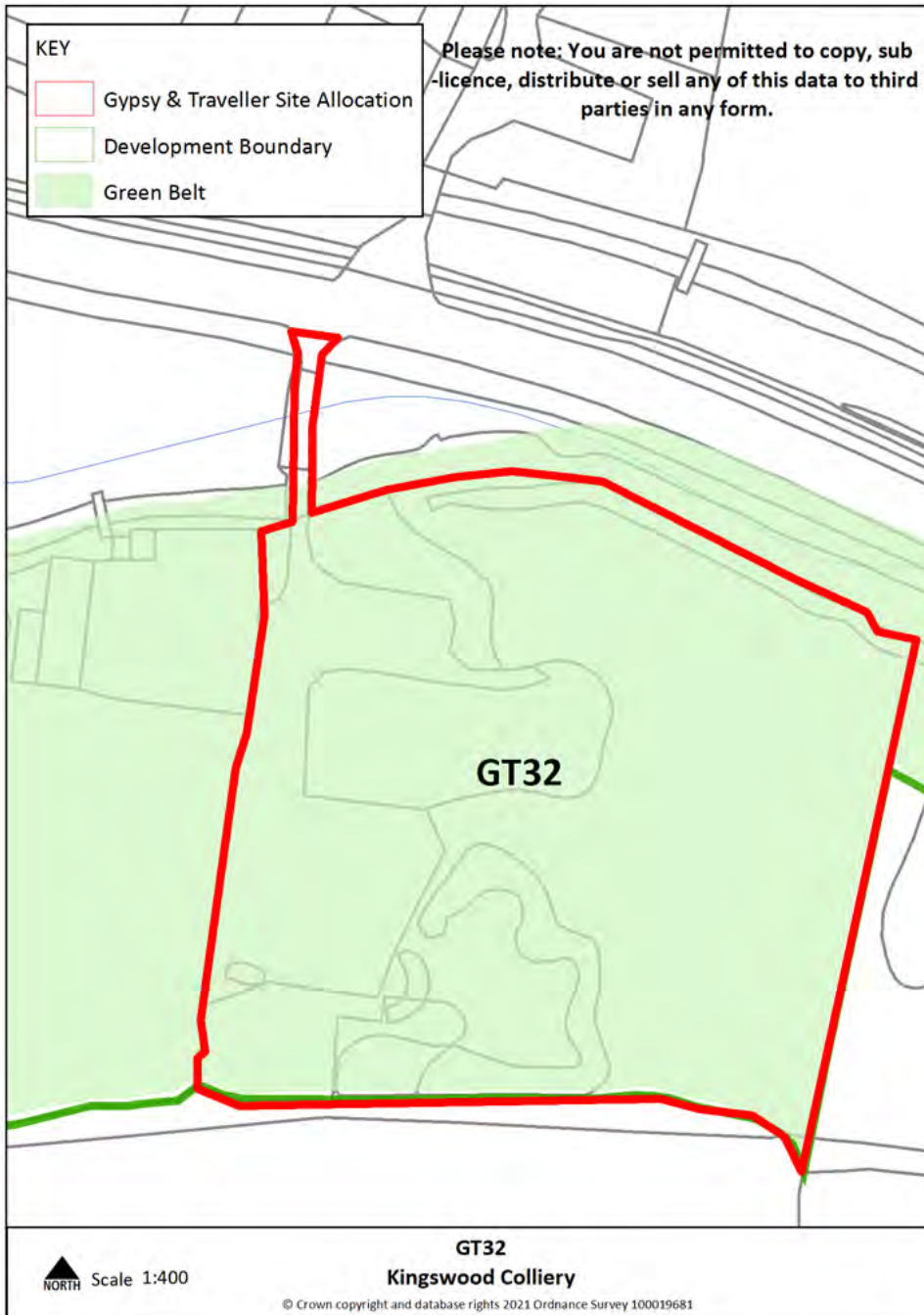
- The allocation should come forward in accordance with Policies SA4 and HC9
- The tree and hedgerow boundaries that border the site should be retained and strengthened where possible.

Site reference	GT23	Site name	Glenside
No. authorised pitches	2	Address	Dark Lane, Slade Heath
Proposed allocation	3	Pitch need (2024-2028)	3
Site area (m2)	2,725	Proposed use	Gypsy and traveller site



Key requirements	<ul style="list-style-type: none"> • The allocation should come forward in accordance with Policies SA4 and HC9 • Retain and reinforce existing tree and hedge boundaries, particularly to the west and south of the site, to protect the character of the Canal Conservation Area and other historic assets in line with the HESA - stage 2 (2022) recommendations for the site
Proposed access	Provide vehicular and pedestrian access via Dark Lane.

Site reference	GT32	Site name	Kingswood Colliery
No. authorised pitches (May/June 2021)	14	Address	Watling Street, Great Wyrley
Proposed allocation	9	Pitch need (2024-2028)	9
Site area (m2)	10,400	Proposed use	Gypsy and traveller sites

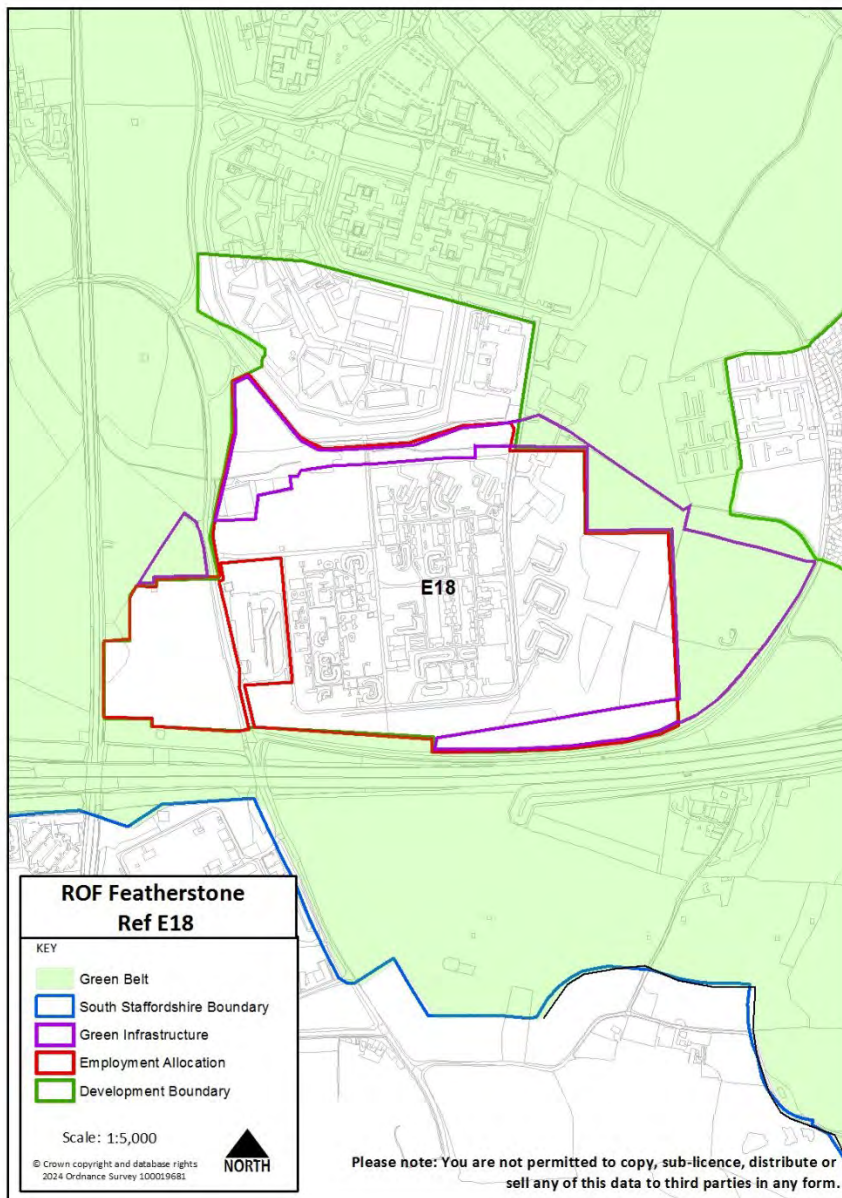


Key requirements	<ul style="list-style-type: none"> The allocation should come forward in accordance with Policies SA4 and HC9. Hedge and tree boundaries that border the site should be retained and strengthen particularly along the sites western and southern edge.
Proposed access	Provide vehicular and pedestrian access via Watling Street.

Appendix E

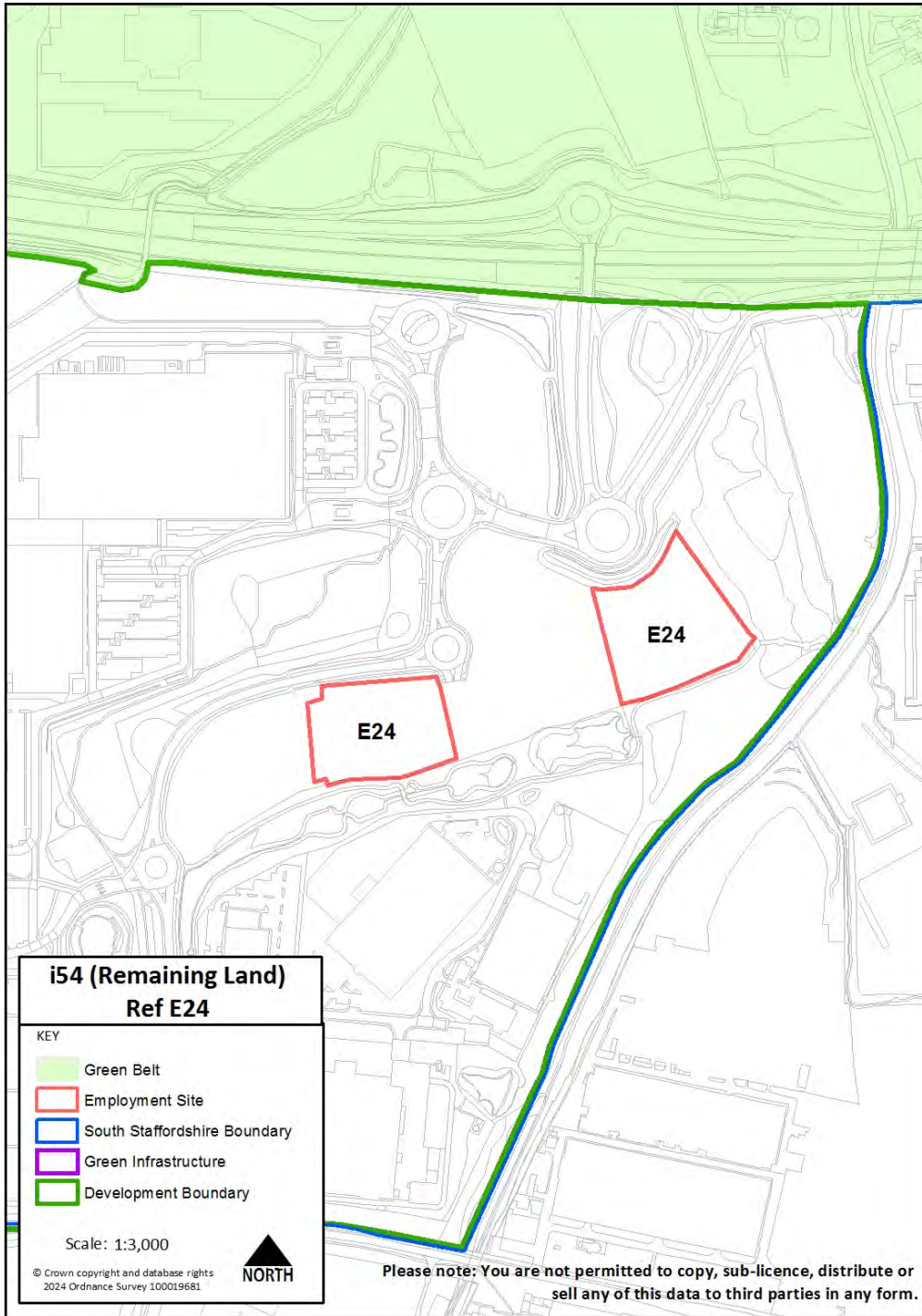
Employment allocation maps and proformas

Site reference	E18	Address	ROF Featherstone
Location	Featherstone		
Site size	36	Proposed use	E(g); B2, B8



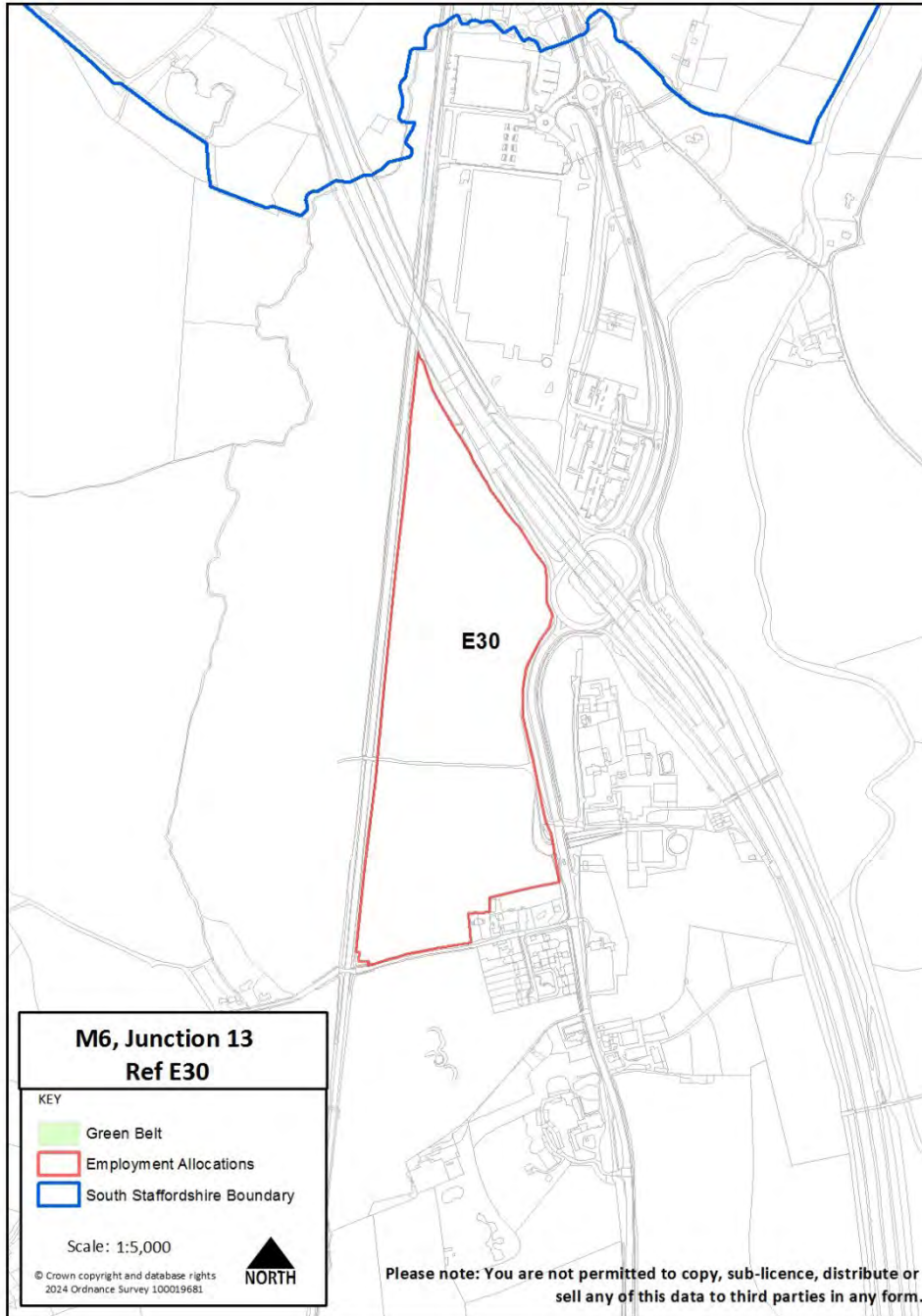
Site access requirements	Access utilising road permitted through previous outline consent (20/01131/OUT).
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Site reference	E24	Address	I54 (remaining land)
Location	Bilbrook		
Site size	2.4ha	Proposed use	E(g); B2;



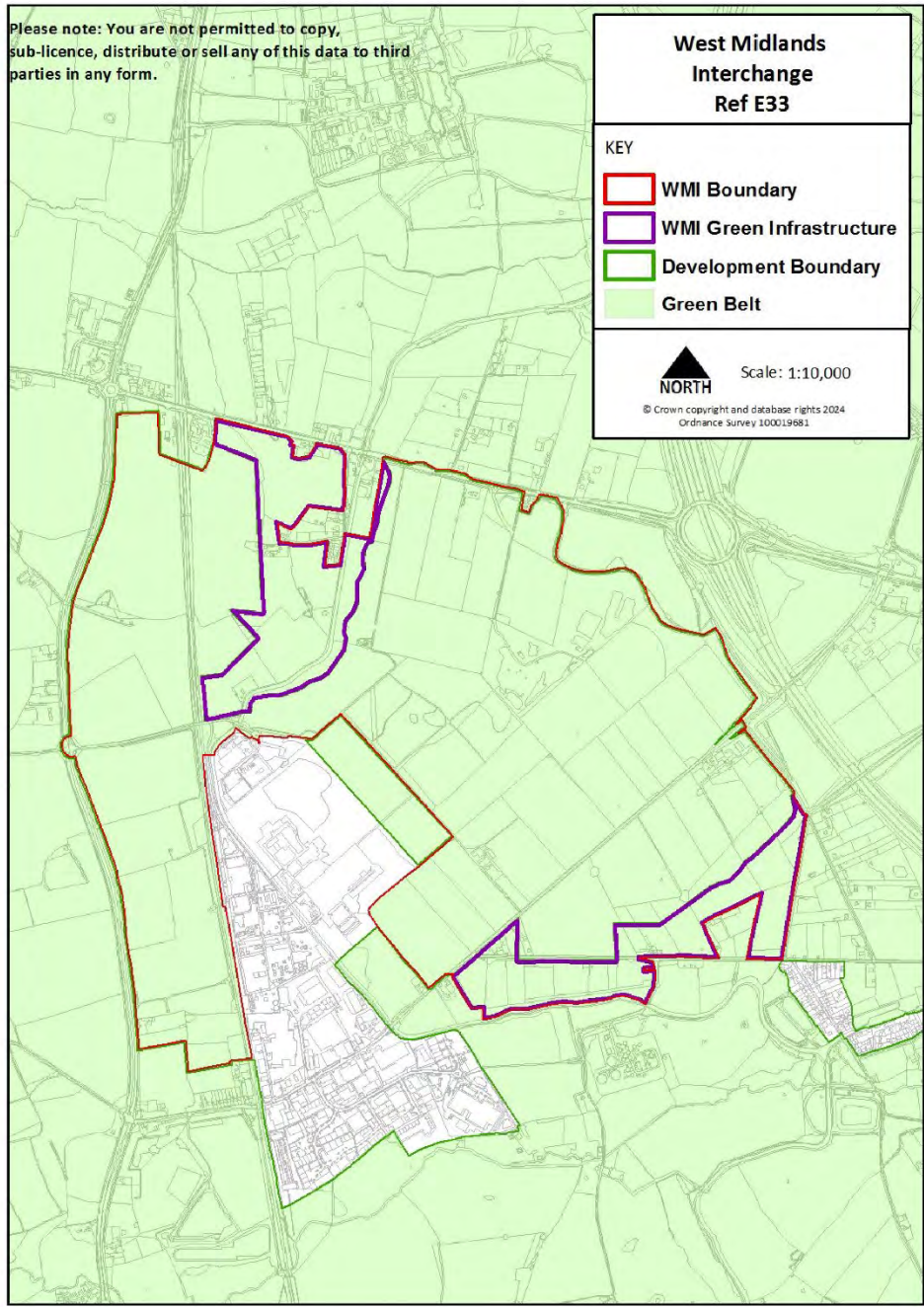
Site access requirements	Access through the existing business park (Innovation Drive).
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Site reference	E30	Address	M6 Junction 13, Dunston
Location	Dunston		
Site size	17.6ha	Proposed use	E(g); B2; B8



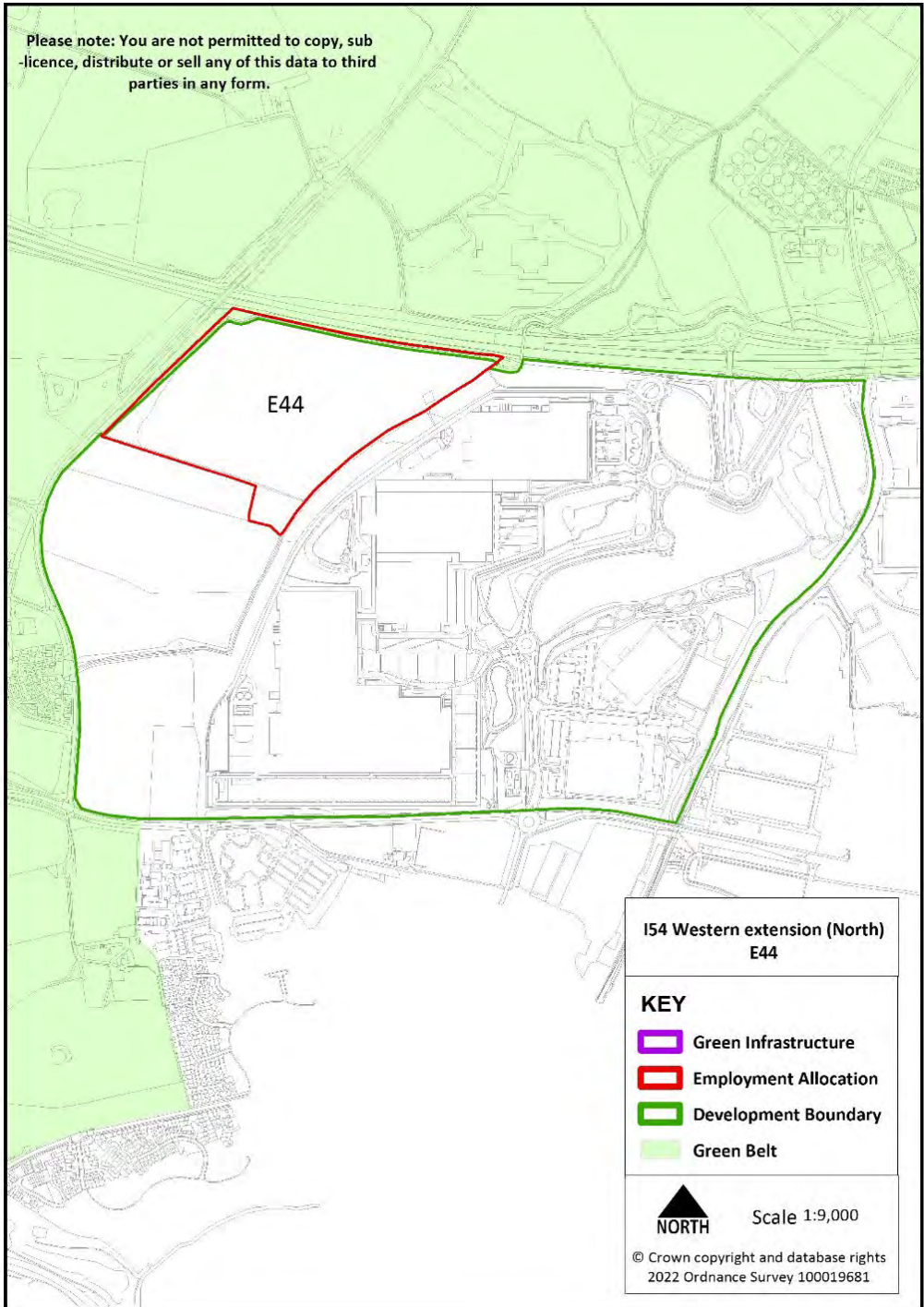
Site access requirements	Access via the A449
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Site reference	E33	Address	West Midlands Interchange
Location	Gailey		
Site size	297ha	Proposed use	B8



Site access requirements	The sites infrastructure and access requirements are set out in the Development Consent Order (DCO) for the site.
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Site reference	E44	Address	I54 western extension (north)
Location	Bilbrook		
Site size	16.7	Proposed use	E(g); B2














Site access requirements	Access through existing i54 business park utilising access permitted through previous outline consent (18/00637/OUT).
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Appendix F

Strategic Masterplanning Locations – Concept Plans

East of Bilbrook Indicative Concept Plan

- Key** Note: SUDs will need to be designed in.
-  School site at the heart
 -  Community hub
 -  Development area
 -  Vehicular, pedestrian and cycle connections
 -  Pedestrian and cycle connections
 -  Primary routes (hierarchy of route sizes not shown)
 -  New arrival point
 -  Cycleway: Sustrans route 81 linking to route i54
 -  Access to existing local rail
 -  Walking & cycling linking homes to central green space
 -  Access route to local shops and rail



North of Penkridge Indicative Concept Plan

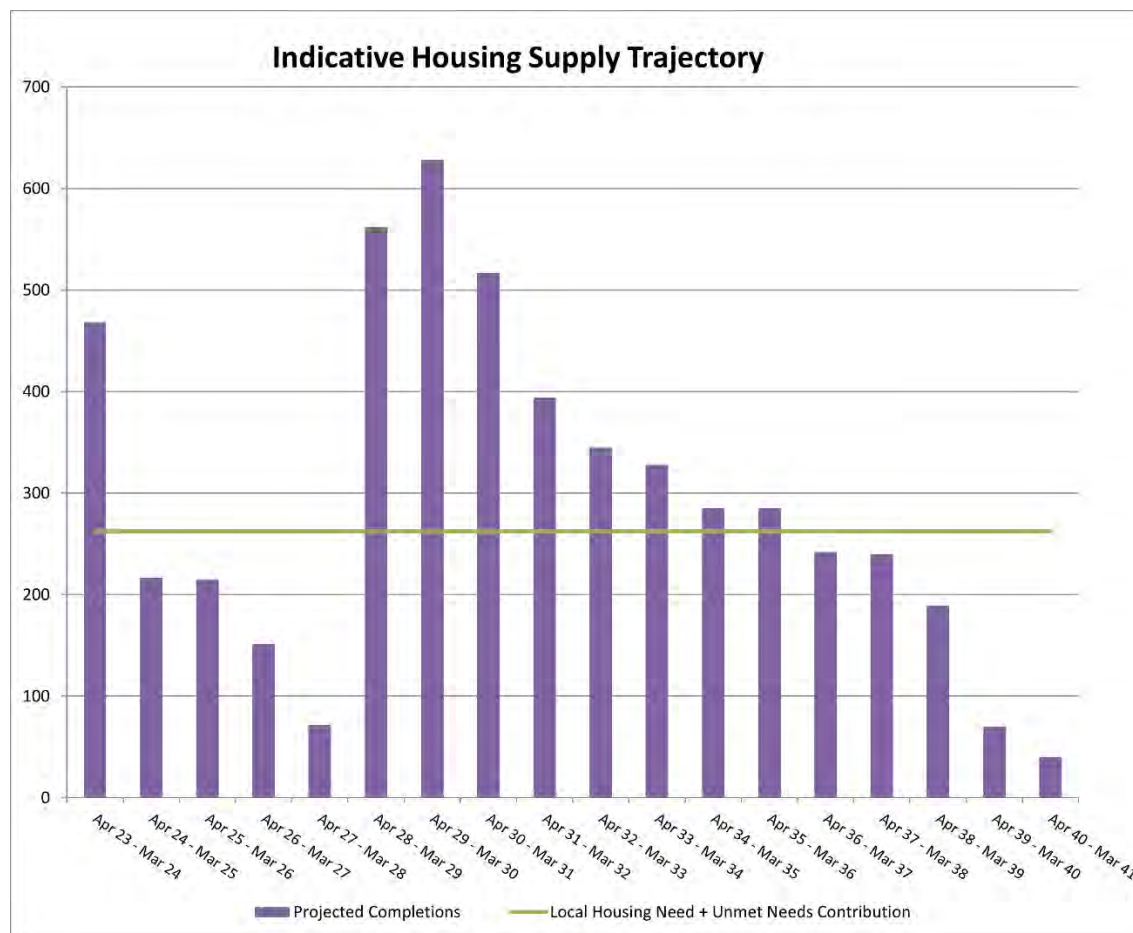
Key Note: SUDs will need to be designed in.

-  School
-  Community hub
-  Development area
-  Primary Routes (hierarchy of route sizes not shown)
-  Central access point
-  Key gateway on northern edge
-  Cycleway
-  Main existing vehicular routes
-  Public Right of Way and Bridleways
-  Access route to local shops and local rail
-  Access to existing local rail
-  Potential development area or location for sports pitches
-  Anaerobic Digestion Plant
-  Linear community park with a variety of green spaces
-  Sustainable links linking homes to central green space & CP



Appendix G

Indicative Housing Trajectory (as at 1st April 2023)



Appendix H

Parking Standards

This Appendix sets down the current recommended parking and electric vehicle charging standards for new developments within the district.

Parking standards are an important element of the council's land use/transportation policy. Many of the numerous development applications made to the council include proposals for parking space adjacent to the development and it is therefore essential for the council to have a parking policy.

The NPPF seeks to encourage a reduction in car usage by promoting sustainable transport choices but also seeks to remove maximum parking standards and encourage local authorities and local communities to set parking standards at a level which best reflect the needs and requirements of their area. In this context, the standards set out below are to be used as a starting point for scheme design, but ultimately the appropriate level of parking will need to have regard to the specific factors set out in Policy HC13.

The parking standards below reflect the number of spaces anticipated to be required for different land uses, but ultimately they should be used in a positive and, in appropriate circumstances, flexible manner as an aid to development. The standards have been reviewed through comparison to similar local authorities in terms of levels of car ownership and urban/rural classification. Residential parking standards in particular have been revised to balance the need to reduce embodied carbon and provide attractive landscaping within a scheme with the need to provide sufficient car parking, offering developers greater flexibility to respond to these policy requirements. This recognises that avoiding unnecessary over-provision of parking spaces is one of the key ways in which residential schemes can reduce their embodied carbon footprint⁷.

Required cycle parking standards are included within these, recognising that has the potential to be a substitute for short car trips, particularly those under 5km and to form part of a longer journey by public transport. In most cases the provision for cycle parking should be made within developments, although in some cases there may be scope for communal cycle parking area e.g. within village/town centres.

⁷ UK Green Building Council – Building the Case for Net Zero: A case study for low carbon residential developments (February 2022)

Table 10: Recommended parking standards for developments

Use class	Car parking	Cycle parking and storage
<i>B2 Industry</i>	1 space per 25 sq.m. up to 250 sq.m., then 1 space per 50 sq.m. (all gross floor space)	1 space per 300 sq.m. gross floor area, secure weatherproof shelter
<i>B8 Warehouses</i>	1 space per 80 sq.m. gross floor space, plus adequate HGV parking and manoeuvring areas to serve the development, having regard to a typical end-user's requirements for HGV usage.	1 space per 300 sq.m. gross floor area, secure weatherproof shelter
<i>C1 Hotels</i>	1 space per 3 employees employed at busiest time plus 1 space per resident staff Guests: 1 space per bedroom Additional spaces may be required for facilities open to non-guests (e.g. spas or conference facilities)	1 space per 5 staff 1 space per 10 guest rooms 1 space per 60 sq.m. for restaurant/entertainment area, secure weatherproof shelter
<i>C3 Traditional Housing</i>	Per dwelling: 5 bed plus - 3 spaces within the curtilage 3 & 4 bed: 2 spaces within the curtilage 1 & 2 bed: 1 space within the curtilage plus 1 space per 3 dwellings for visitors	Minimum 1 secure space per unit ⁸
<i>C3 Sheltered housing, elderly persons homes</i>	Other Residents/Visitors: 1 car space per 3 dwellings/units of accommodation/bedroom Non-resident care staff: 1 space per 3 staff present at busiest time Visitors: 1 space per 4 flats	Minimum 1 secure space per resident staff, secure weatherproof shelter
<i>C3 Self-contained flats/apartments</i>	Residents: 1 space per flat Visitors: 1 space per 4 flats	Minimum 1 secure space per unit, secure weatherproof shelter (internal or external)
<i>E.(a) Retail</i>	Staff: 1 space per 95 sqm gross floor space Customers: 1 space per 20sqm gross floor space	1 space per 200 sq.m. gross floor area, secure weatherproof shelter
<i>E.(b) Restaurants/cafe</i>	Staff: 1 space per 85 sq.m. gross floor space Diners: 1 space per 5 sq.m. of dining area or 1 lorry space (artic) per 3sq.m. dining area in the case of transport cafes	1 space per 60 sq.m. gross floor area (excluding associated residential accommodation), secure weatherproof shelter
<i>E.(c) Offices (financial & professional services)</i>	Staff & Visitors: 1 space per 20 sq.m. gross floor space	1 space per 200 sq.m. gross floor area, secure weatherproof shelter

⁸ Dwellings with garages that have the minimum internal dimensions stated under 'Car Parking Design Specifications' can be considered to have a secure space. If no garage is to be provided, the development will need to include, and demonstrate on plans, a garden shed or bespoke cycle storage.

<i>E.(d) Sports centres</i>	Staff and visitors:1 space per 2 persons staffing and using the premises at the busiest time	1 space per 10 car parking spaces, secure weatherproof shelter
<i>E.(e) Clinics/ GP practices /Health Centres</i>	Staff: 1 space per GP. 1 space for each other medical member of staff employed at busiest time 1 space for each 2.5 non-medical member of staff employed at busiest time Visitors: 3 spaces per consulting room	1 space per 3 consulting rooms, secure weatherproof shelter
<i>E.(f) Nursery Schools</i>	1 space per member of teaching staff 1 drop-off space per 10 children	1 space per 5 staff plus 1 space per 200 sq.m. for visitors, secure weatherproof shelter
<i>E.(g) Offices</i>	1 space per 20 sq.m. up to 200 sq.m., then 1 space per 30 sq.m. (all gross floor space)	1 space per 300 sq.m. gross floor area, secure weatherproof shelter
<i>F.1(a) Primary/ Secondary schools</i>	1 space per member of teaching staff 1 space per 3 member of non-teaching staff A suitable part of the hard play area to be allocated and suitably constructed so it can be used by cars on school open days, etc Suitable space should be identified for buses to manoeuvre to allow for pupil drop off and pick up	1 space per 5 staff plus 1 space per 3 students, secure weatherproof shelter
<i>F.1(a) Colleges/ adult training centres</i>	1 space per member of teaching staff 1 space per 10 full-time equivalent students	1 space per 5 staff plus 1 space per 3 students, weatherproof shelter
<i>F.1(d) Libraries</i>	Staff: 2 spaces up to 300 sq.m. gross floor area, 6 spaces above 300 sq.m. gross floor area Visitors: 1 space per 50 sq.m. gross floor area	1 space per 15 staff plus 1 space per 60 sq.m, weatherproof shelter
<i>F.1(e) Assembly Halls</i>	Staff: 1 space per 2.5 employees employed at busiest time 1 space per 5 sq.m. public floor space	1 space per 10 car parking spaces, weatherproof shelter
<i>F.1(f) Churches</i>	1 space per 5 seats	-
<i>F.2(c) Tennis/ golf/ bowling (greens)</i>	1 space per 3 sq.m. of indoor public floor area 2 spaces per court 1 space per lane of any driving range 2 spaces per golf hole	1 space per 10 car parking spaces, weatherproof shelter
<i>F.2(c) Cricket, football, rugby</i>	1 space per 3 sq.m. of public floor area of buildings 12 spaces and 1 space for a coach per pitch Suitable space should be identified for	1 space per 10 car parking spaces, weatherproof shelter

	coaches to manoeuvre to allow for player drop off and pick up	
<i>Public Houses</i>	Staff: 1 space per 85 m ² gross floor space Bar customers: 1 space per 2.5 sq.m. of public drinking area Food customers: 1 space per 3 sq.m. of public dining area	1 space per 60 sq.m. gross floor area (excluding associated residential accommodation), weatherproof shelter
<i>Day care and adult training centres</i>	In particular centres for physically handicapped will require accommodation for special passenger vehicles with tail lift, etc. 1 space per member of staff at busiest time Visitors: 1 space for a unit of 5 persons	1 space per 5 staff, weatherproof shelter
<i>Vehicle service, tyre, exhaust garage</i>	3 vehicle spaces per each service/repair bay 1 car space for every 40 sq.m. of gross floor area	-
<i>Car sales</i>	Staff: 1 space per 25 sq.m. Customers: 1 space per 40 sq.m. of gross sales floor area plus 1 space per 10 outside display places For ancillary workshop/storage areas and parts departments: 3 vehicle spaces per each service/repair bay 1 car space for every 40 sq.m. of gross floor area	-
<i>Car wash facilities</i>	5 queuing spaces	-
<i>Caravan sites</i>	Occupiers: 1 space per caravan Visitors: 1 space per 5 caravans	-
<i>Garden centres</i>	Staff and customers: 1 space per 50 sq.m. sales area For café apply E.(b) standards	-
<i>Marinas</i>	1 space per 2 mooring berths	-
<i>Hot food takeaway</i>	1 space per 2 staff 1 space per 3 sq.m. of waiting area. These standards may be relaxed or waived where public parking is readily available nearby.	-

Using the standards

The standards apply to new development, extensions and changes of use. When considering an extension to an existing use, the standard will be applied only to the extension and any shortfall in parking provision for the existing building will not be required to be met. When considering a redevelopment or change of use, the level of parking provision will relate to the requirements of the development as a whole.

Mixed uses will be assessed as a sum of the parking requirements of the individual elements of the scheme based on the standards, unless the timing of demand associated with individual uses can be shown to allow dual use of spaces. In mixed developments where the main parking demands take place at different times e.g. daytime and evening, an element of dual use of parking spaces will be acceptable.

Cycle Parking Design Specifications

With the exception of traditional houses where cycle storage can be provided internally, all cycle parking should be provided in a secure weatherproof shelters in the first instance. Storage facilities should provide the ability to secure both wheels and the frame of a bike (unless lockers are used), should be protected from the elements and should be accompanied by clear signage. Cycle parking should be situated as close as possible to the destination that they serve, should benefit from good lighting and natural surveillance and should be at least as accessible (if not more so) than car parking provided by a scheme.

Car Parking Design Specifications

The dimensions of a car parking space to be used in new development is 2.4m x 4.8m. Where a parking space has a restriction either side (e.g. a fence or side wall) then a width of 3m should be used. An aisle between parking bays set at 90 degrees to it shall have a width of 6m. Alternatively, an aisle between parking bays set at 45 degrees to the traffic flow may have a minimum width of 3m. Where garage frontages face the public highway, there should be a minimum distance of 6.0m between the garage and the highway boundary, to allow vehicles to stand clear of the highway whilst the garage door is being opened. For single garages the minimum internal dimensions should be 6.0m x 3.0m. For double garages the minimum internal dimensions of 6.0m x 6.0m.

With regard to disabled parking, the dimensions should be 2.4m x 4.8m plus a 1.2m accessibility zone between and a 1.2m safety zone on the vehicular side of the parking bays, with a dropped kerb when there is a pedestrian route on the other side of the parking bay. The Building Regulations requirements specify that parking spaces for people with disabilities should be at least 3.6m wide and 6.0m long in order to allow occupants of vehicles to get in and out of vehicles safely and to provide access to the rear of the vehicle for wheelchair storage. Disabled parking should be provided on firm and level ground and as close as feasible to the main entrance of the buildings.

Where the provision of lorry parking spaces is involved in any development proposal, they should range between 13.5m x 3.6m to 17.5m x 4.7m depending on the type of vehicles anticipated. All new employment uses and extensions to existing premises will be required to provide adequate on-site parking for employees, visitors and deliveries, together with manoeuvring in accordance with these standards.

Parent and child parking should be provided for all E.(a) (and other similar sui generis) retail over 1,000 sq.m.

Surface parking must be designed so as to not detract from the streetscene and wider public realm, ensuring that concentrations of parking are appropriately landscaped within and around the car parking area to avoid unattractive and sterile areas. Safe, legible and attractive pedestrian routes through parking areas should be clearly defined through use of surface treatments and landscaping.

Electric Vehicle Charging Points

South Staffordshire has a higher level of car ownership per household than the West Midlands region and national averages. It is also heavily reliant on car journeys to provide access to employment, with high proportions of the district’s residents commuting out of the area to jobs in neighbouring urban authorities. The district’s largest source of carbon emissions is also from surface transport and this must be addressed if local plan is to play its part in delivering the rapid reductions in emissions necessary to achieve the government’s carbon reduction targets.

As part of achieving these aims it is vitally important that the local plan facilitates a rapid transition to electric vehicles within the plan period. To provide the charging infrastructure necessary to support this transition, the following minimum electric vehicle charging requirements will be required from new development.

Table 11: Electric vehicle (EV) charging standards for new developments

Residential development	EV charging requirement	Minimum charge point specification
<i>Houses</i>	1 fast charge socket per house, located on a parking space within the property’s curtilage	7kw
<i>Flats/Apartments</i>	1 fast charge socket per dwelling, using both allocated and unallocated spaces where necessary	7kw
Non-residential development	EV charging requirement	Minimum charge point specification
<i>B2 Industry (>500sqm)</i> <i>B8 Warehouses (>1000sqm)</i> <i>C1 Hotels</i> <i>C2 Care/Nursing Home</i> <i>E.(a) Retail (500 – 1,849sqm)</i> <i>E.(c) Offices (financial & professional services) (>500sqm)</i> <i>E.(d) Sports centres (>500sqm)</i> <i>E.(e) Clinics/ GP practices /Health Centres</i> <i>E.(g) Offices (>500sqm)</i>	20% of available spaces to be fitted with a fast charge socket plus A further 20% of available spaces to be provided with power	7kw Feeder pillar or equivalent permitting future connection

<i>F.1(a) Primary/ Secondary schools F.1(a) Colleges/ adult training centres F.1(e) Assembly Halls (>500sqm)</i>	supply to provide additional fast charge socket	
High demand, short stay land uses	EV charging requirement	Minimum charge point specification
<i>Development with high demand and short stay trips in strategic locations, including (but not limited to) - Motorway/ Strategic Service Stations, - Large petrol filling stations - Large scale (1,850sqm or more) retail</i>	20% of available spaces to be fitted with a fast charge socket	7kw
	A further 10% of available spaces to be provided with power supply to provide additional fast charge sockets	Feeder pillar or equivalent permitting future connection
	1 or more rapid charge sockets	50kw Mode 4 (DC) multi-standard charge point. 400v AC 100Amp Triple Phase dedicated power supply.

Unless otherwise specified, all electric vehicle charge points delivered to meet these standards must be fitted with a universal socket and be a minimum of a Mode 3 specialised system for electric vehicle charging running from a dedicated circuit, or equivalent. It is the responsibility of the developer to ensure that the electricity supply is sufficient to meet future demands and that any power balancing technology is in place if required.

Appendix I

Monitoring Framework

Indicator	Target	Relevant policies
Strategic Objective 1		
(i) Unidentified Green Belt compensatory improvements adjacent to allocated sites should be in the closest proximity to the site in question.	<p>(i) Percentage of applications with compensatory Green Belt improvements directly adjacent or in close proximity to the site.</p> <p>(i) Percentage of applications with compensatory Green Belt improvements in the wider locality of the site.</p> <p>(i) Percentage of applications with compensatory Green Belt improvements on land identified in the latest Nature Recovery Network Mapping or Open Space Strategy.</p>	DS2
Strategic Objective 2		
<p>(i) Monitor the net number of housing completions.</p> <p>(ii) Monitor the net quantity of employment land delivered.</p> <p>(iii) Monitor the net number of Gypsy and Traveller pitches delivered.</p>	<p>(i) Meet an annualised requirement, and be on course towards meeting, the total housing number for the district (4,726).</p> <p>(ii) Be on course towards meeting the total employment land being planned for in the district (107.4ha).</p> <p>(iii) Be on course towards meeting, the total Gypsy and Traveller pitches planned for in the district (37).</p> <p>(iii) Record the number of Gypsy and Traveller pitches delivered through the DtC, or through windfall permissions, that contribute towards the district's under-supply.</p>	DS4
(i) Monitor the supply and delivery of the two strategic residential sites.	(i) Annual reporting to identify the delivery progress of each respective site.	SA1 SA2
(i) Monitor the supply and delivery of the other allocated residential sites.	(i) Annual reporting to identify the delivery progress of each respective site.	SA3
(i) Monitor the supply and	(i) Annual reporting to identify the delivery	SA4

delivery of the allocated Gypsy and Traveller pitches.	progress of each respective site.	
(i) Monitor the supply and delivery of the allocated employment land.	(i) Annual reporting to identify the delivery progress of each respective site.	SA5
Strategic Objective 3		
(i) Monitor the delivery of dwelling sizes by number of bedrooms.	(i) 70% of new market properties to have 3 bedrooms or less. (i) Housing mixes of all residential sites should generally reflect the most up to date Housing Market Assessment.	HC1
(i) Monitor the delivery of affordable housing by type and tenure.	(i) 30% of all new dwellings on major developments to be an affordable product. (i) 25% of affordable housing to be delivered as first homes. (i) 50% of affordable housing to be delivered as social rent product. (i) 25% (or the remaining units) of affordable housing to be delivered as shared ownership product.	HC3
(i) Monitor the delivery of dwellings suitable for older people and others with special housing requirements. (ii) Monitor the delivery of homes meeting enhanced accessibility standards	(i) All major residential proposals to make a contribution to accommodation needs of older people and others with special housing requirements. (ii) 100% of all new dwellings on major development to meet Part M4(2) of Building Regulations	HC4
(i) Monitor the delivery of self-build and custom housebuilding plots	(i) Sufficient number of plots delivered to reflect the need identified on Part 1 of the council's Self-build and Custom Housebuilding Register	HC8
Strategic Objective 4		
(i) Monitor the delivery of homes meeting the Nationally Described Space Standard	(i) All new dwellings to meet the nationally described space standard	HC12
Strategic Objective 5		
(i) Monitor the loss of healthcare infrastructure.	(i) No healthcare infrastructure to be lost without adequate alternative provision available.	HC14
(i) Monitor the loss of education infrastructure.	(i) No education infrastructure to be lost without adequate alternative provision	HC15

	available.	
(i) Monitor the loss of open spaces.	(i) No open space to be lost.	HC17
(ii) Monitor the quantity of open space delivered on qualifying new residential developments.	(ii) All sites delivering a minimum of 33 dwellings should be providing on site open space.	
(i) Monitor the loss of sports facilities and playing pitches.	(i) No sports facilities or playing pitches to be lost.	HC18
Strategic Objective 6 & 7		
(i) Monitor the location of employment land development, including the quantity developed on PDL.	(ii) Employment land to be primarily brought forward on identified strategic and allocated employment sites. Tier 1 and Tier 2 settlements to supplement.	EC1
(ii) Monitor the delivery of the remaining available land for employment use at the Strategic Employment Sites.		
(i) Monitor and record the loss of employment land (by use class) to alternative uses.	(i) No losses of strategic, allocated or other identified employment land sites (as set out in Table 9).	EC2
(i) Monitor the number of planning permissions granted for employment uses (by use class) outside of defined development boundaries.	(i) Monitor only.	EC4
Strategic Objective 8,9 &10		
(i) Monitor applications granted for retail use outside of defined local centres.	(i) No applications to be approved without satisfying sequential test and impact assessment	EC8
(i) Monitor the delivery and quantity of EV charging points on all new developments.	(i) 20% of available parking spaces on major residential accommodation (other than houses and residential apartments), and commercial development to be fitted with minimum 7kW charge point. A further 20% of parking spaces to be fitted with power supply for future conversion.	EC11
(ii) Monitor the provision of offsite contributions towards infrastructure	(ii) Monitor financial contributions received for infrastructure provision including education, highways, health and sports facilities.	
Strategic Objective 11		
(i) Record the Biodiversity Net Gain improvements by	(i) All developments to meet a minimum of 10% Biodiversity Net Gain.	NB2

percentage.		
Strategic Objective 12		
(i) Record the quantity and type of low carbon / renewable energy generation schemes in the district.	(i) Monitor only.	NB5
(i) Monitor the operational carbon reduction percentage achieved on residential developments and BREEAM compliance on major non-residential development. (ii) Monitor the amount of lifecycle carbon emissions on schemes of 50 dwellings or 5,000 sqm or more. (iii) Post occupancy evaluation on schemes of over 50 homes and non-residential developments of 5,000m2 floorspace or more.	(i) All residential development to achieve a minimum 63% reduction on the Part L 2021 TER (regulated carbon emissions) through energy efficiency features. (i) All major non-residential development to achieve BREEAM 'Excellent' or better. (i) Non residential development to achieve 15% improvement on Part L 2021 TER through energy efficiency features (ii) 100% of schemes of 50 dwellings or more or 5,000 sqm or more to deliver a whole lifecycle carbon assessment using RICs Whole Life Carbon Assessment Guidance and limit embodied carbon to 550 kgCO2/m2 GIA. (iii) Monitor only	NB6A NB6B NB6C
Strategic Objective 13		
(i) Record annually the number of listed buildings on Historic England's buildings at risk register	(i) Monitor only.	NB8

Appendix J

Glossary

Active Travel - Modes of travel that involve a level of activity. The term is often used interchangeably with walking and cycling, but active travel can also include trips made by wheelchair, mobility scooters, adapted cycles, e-cycles, scooters, as well as cycle sharing schemes.

Adoption – The final stage of the plan making process. The plan is adopted by resolution of a full meeting of the Local Planning Authority (LPA). This formally confirms the plan as council policy.

Affordable Housing – As per the Government NPPF definition: housing for sale or rent, for those whose needs are not met by the market. This includes: affordable housing for rent (such as social rent, affordable rent or at least 20% below local market rents), starter homes, discounted market sales housing, and other affordable routes to home ownership (such as shared ownership).

Authority Monitoring Report (AMR) – A report produced by the LPA to show how the Authority is performing against all agreed targets.

Appropriate Assessment (AA) – An assessment of the potential effects of a proposed plan – in combination with other plans and projects – on sites designated as part of a European network of designated nature conservation areas including Special Areas of Conservation (SACs). The Assessment itself is a statement that says whether the plan does, or does not, affect the integrity of the European site. The appropriate assessment forms part of the Habitats Regulations Appraisal (HRA) process.

Area of Outstanding Natural Beauty (AONB) - An area with statutory national landscape designation, the primary purpose of which is to conserve and enhance natural beauty.

Biodiversity - The whole variety of life encompassing all genetics, species and ecosystem variations, including plants and animals.

Brownfield Land and Sites - See 'Previously Developed Land'.

Climate Change - Long-term changes in temperature, precipitation, wind and all other aspects of the Earth's climate, primarily considered to be the consequence of human activity and fossil fuel consumption.

Community Facilities

Community facilities provide for the health, welfare, social, educational, spiritual, recreational, leisure and cultural needs of the community.

Community Forest - A large area of land transformed into a wooded landscape by a partnership of local authorities, national agencies and private, voluntary and community

organisations to support employment, recreation, education and wildlife. The Forest of Mercia is a Community Forest.

Conservation Area - Areas of special architectural or historic interest, the character, appearance or setting of which it is desirable to preserve or enhance.

Cycle Network - An integrated network of both on and off road routes to facilitate an easier and safer journey for cyclists.

Density - In the case of residential development, a measurement of either the number of habitable rooms per hectare or the number of dwellings per hectare.

Department for Levelling Up, Housing and Communities (DLUHC) – The government department responsible for planning, housing, homelessness and levelling up. It supports communities across the UK to thrive, making them great places to live and work.

Design code - A set of illustrated design requirements that provide specific, detailed parameters for the physical development of a site or area. The graphic and written components of the code should build upon a design vision, such as a masterplan or other design and development framework for a site or area.

Design guide - A document providing guidance on how development can be carried out in accordance with good design practice, often produced by a local authority.

Development - Development is defined under the 1990 Town and Country Planning Act as "the carrying out of building, engineering, mining or other operation in, on, over or under land, or the making of any material change in the use of any building or other land." Most forms of development require planning permission (see also "permitted development").

Development Management - The process whereby a local planning authority manages, shapes, and considers the merits of a planning application and whether it should be given permission having regard to the development plan.

Development Plan – Also known as the Local Plan, the term given to the documents setting out the adopted planning policies to guide development within the district. Decisions on planning applications are to be taken in accordance with the Development Plan unless material considerations indicate otherwise.

Development Plan Documents (DPDs) – Spatial planning documents prepared by the LPA and subject to Independent Examination. For South Staffordshire, they include the Local Plan, the Policies Map and any adopted Neighbourhood Plans. DPDs are required to have a Sustainability Appraisal (SA).

Economic Development Needs Assessment (EDNA) - An objective assessment of the quantity and type of employment space required within the Local Planning Authority area or Functional Economic Market Area.

Embodied carbon/lifecycle emissions – The carbon emissions associated with the extraction and processing of materials and the energy and water consumption used by the factory in producing products and constructing the building. It also includes the ‘in-use’ stage (maintenance, replacement, and emissions associated with refrigerant leakage) and ‘end of life’ stage (demolition, disassembly, and disposal of any parts of product or building) and any transportation relating to the above.

European Site - Nature conservation sites afforded the highest level of protection in the UK through European legislation. They include Special Areas of Conservation (SAC), candidate (cSAC), Special Protection Areas (SPA), proposed (pSPA), European offshore Marine Sites and Ramsar.

Evidence Base – The researched, documented, analysed and verified basis for all the components of a Local Plan. The work used to create the Local Plan can be published in the form of background papers.

First Homes Exception Site – An exception site (that is, a housing development that comes forward outside of local or neighbourhood plan allocations to deliver affordable housing) that delivers primarily First Homes.

Flood Risk Assessment - An assessment of the likelihood of flooding in a particular area so that development needs and mitigation measures can be carefully considered.

Fossil fuel - A natural fuel such as petroleum, coal or gas, formed in the geological past from the remains of living organisms. The burning of fossil fuels by humans is the largest source of emissions of carbon dioxide, which is one of the greenhouse gases that allows radiative forcing and contributes to global warming.

Green Belt (not to be confused with the term ‘greenfield’) – A statutory planning designation for open land around certain cities and large built-up areas, which aims to keep land permanently open or largely undeveloped. The purposes of Green Belt are to:

- check the unrestricted sprawl of large built up areas;
- prevent neighbouring towns from merging;
- safeguard the countryside from encroachment;
- preserve the setting and special character of historic towns; and
- assist urban regeneration by encouraging the recycling of derelict and other urban land.

Greenfield Land or Site - Land (or a defined site) which has never been built on before or where the remains of any structure or activity have blended into the landscape over time.

Green Infrastructure - a network of green spaces and other environmental features including street trees, gardens, green roofs, community forests, parks, rivers, canals and wetlands. Green Infrastructure includes established green spaces and new sites and should thread through and surround the built environment and connect the urban area to its wider rural hinterland.

Gypsy and Travellers – The Government defines Gypsies and Travellers for planning purposes as ‘Persons of a nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family’s or dependants’ educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such’.

Gypsy and Traveller Accommodation Needs Assessment (GTAA) – An assessment of the accommodation needs of Gypsies and Travellers which establishes the pitch requirements over the lifetime of the plan period.

Habitat – An area of nature conservation interest.

Habitat Regulations Assessment (HRA) – An assessment of the potential impacts of plans and programmes on sites designated as of European Importance for their nature conservation value.

Heritage Asset – A building, monument, site, place, area or landscape identified as have a degree of merit because of its heritage interest.

Historic Environment Record (HER) – A comprehensive resource of the historic environment of Staffordshire. It provides information about archaeological sites, historic buildings, historic landscape and other heritage features within Staffordshire. The baseline historic environment data contained in the HER underpins a wide range of work undertaken for the Historic Environment and decision making.

Historic Landscape Characterisation (HLC) – seeks to identify, and as far as possible, understand the historic development of today's landscape. It places emphasis on the contribution that past historic processes make to the character of the landscape as a whole, not just selected 'special sites' and can contribute to a wider landscape assessment.

Historic Parks and Gardens - A park or garden of special historic interest. Graded I (highest quality), II* or II. Designated by Historic England.

Housing Market Assessment – An objective assessment of the quantity and type of housing required within the Local Planning Authority area. This assessment incorporates the requirement within the NPPF to produce a local housing need assessment.

Independent Examination – An examination held in public by an Inspector appointed by the Secretary of State into the policies and proposals within a Development Plan Document (DPDs). The examination will consider the “soundness” of the document. Following the inspection, the Inspector will, where relevant, submit a report to the Local Planning Authority proposing possible amendments to the submitted plan.

Issues and Options – a non-statutory stage of the plan making process during which different site and policy options may be considered and issued for consultation.

Infrastructure – A broad term to define all the requirements that are needed to make places function efficiently and effectively. Infrastructure can range from large physical infrastructure such as roads and utilities; social infrastructure like health, educational and cultural programs, projects, networks and facilities; through to Green Infrastructure such as open spaces and allotments.

Landscape Character - The distinct and recognisable pattern of elements that occur consistently in a particular type of landscape. It reflects particular combinations of geology, landform, soils, vegetation, land use and human settlement.

Large Village Centre - The largest retail centres in the district, with the greatest number and range of Main Town Centre uses. Has more of a convenience store presence, as well as comparison goods shops and community, and other professional services which serve the needs of the settlement, with a catchment extending outside of the village.

Listed Building - A building of special architectural or historic interest. Graded I (highest quality), II* or II.

Local Development Document (LDD) – A local planning document which can be either a statutory Development Plan Document (DPD) or a non-statutory Supplementary Planning Document (SPD).

Local Development Scheme (LDS) – A document setting out the LPA’s programme for the preparation of the Local Plan and any SPDs within a three-year period and a timetable for their production and review. It will also state which policies will be saved from the existing Local Plan.

Local Nature Reserve (LNR) – Sites of importance for wildlife, geology, education or public enjoyment.

Local Plan – A collection of statutory Development Plan Documents (DPDs) prepared by the LPA that sets out policies and allocations for delivering the economic, environmental and social aims of the area. A number of SPDs will also provide additional guidance to the policies contained in the Local Plan.

Local Planning Authority (LPA) - The local authority or council that is empowered by law to exercise planning functions. Often the local borough or district council.

Local Transport Plan – A five-year integrated transport strategy, prepared by local authorities in partnership with the community, seeking funding to help provide local transport projects. The plan sets out the resources predicted for delivery of the targets identified in the strategy.

Major Development – For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional floorspace of 1,000m² or more, or a site of 1 hectare or more, or as otherwise

provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015.

Material Consideration – A matter that should be taken into account in formulating planning policy and when determining a planning application.

Mixed Use (or mixed use development) - Provision of a mix of complementary uses, such as residential, community and leisure uses, on a site or within a particular area.

Monitoring (and review) – The process of measuring (in terms of quantity and quality) the changes in conditions and trends, impact of policies, performance of the plan against its objectives and targets, and progress in delivering outputs. Please also refer to Authority Monitoring Report (AMR).

National Planning Policy Framework (NPPF) - The NPPF sets out the Government’s planning policies for England and how these are expected to be applied. It sets out the Government’s requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.

Nature Conservation - The protection, management and promotion of wildlife habitats for the benefit of wild species, as well as the communities that use and enjoy them.

Neighbourhood Centre - The smallest defined retail centres in the district, with a limited range and scale of facilities. The offer largely provides for a day-to-day convenience goods need, occasionally offering minor services for a very localised area. The majority of stores are the focus for ‘top-up’ shopping.

Neighbourhood Plan - A plan prepared by a parish council or neighbourhood forum for a designated neighbourhood area. In law this is described as a neighbourhood development plan in the Planning and Compulsory Purchase Act 2004.

Offsetting - Offsetting is the process of compensating for the remaining carbon emissions balance by contributing, usually financially, towards solutions to reduce emissions elsewhere.

Open Space - All space of public value, including not just land, but also areas of water such as rivers, canals, lakes and reservoirs, which can offer opportunities for sport and recreation. They can also act as a visual amenity and a haven for wildlife.

Open Space Audit – An audit of the open spaces within the district including an assessment of facilities and character.

Out-of-Centre - In retail terms, a location that is clearly separate from the primary shopping area of a town centre but not necessarily outside the urban area.

Plan-led System - The principle that decisions upon planning applications should be made in accordance with adopted development plans (and DPDs), unless there are other material considerations that may indicate otherwise.

Planning & Compulsory Purchase Act 2004 - The Act updates elements of the 1990 Town & Country Planning Act. The Planning and Compulsory Purchase Act 2004 introduced a statutory system for regional planning; and a system for local planning known as Local Development Frameworks (LDFs). The local planning system has since been subject to government reforms and the details of which were set out in the Localism Act 2011 and the National Planning Policy Framework (NPPF).

Planning Practice Guidance - National online planning guidance which gives greater detail to the national planning policy framework.

Pitch/plot – An area of land on a site/development generally home to one licensed household. They can be of varying sizes and have varying caravan occupancy levels. Often also referred to as a plot, particularly in relation to Travelling Showpeople. There is no agreed definition as to the size of a pitch.

Planning Obligations/S106 Agreements – Contributions secured by the council to help provide or fund infrastructure items or services that will help to make development acceptable in planning terms.

Preferred Options – During formal public consultation on a Development Plan Document (DPD), the LPA will offer preferred options and proposals. The council will offer those options, which are reasoned to be the most appropriate.

Previously Developed Land (PDL) or ‘Brownfield’ Land - Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds 71 and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.

Policies Map – The component of a local plan showing the location of proposals in the plan, on an Ordnance Survey base map.

Public Open Space - Urban space, designated by a council, where public access may or may not be formally established, but which fulfils or can fulfil a recreational or non-recreational role (for example, amenity, ecological, educational, social or cultural usages).

Renewable Energy – Renewable energy technologies use natural energy sources to generate electricity and/or heating/cooling. Sources include solar, wind, wave, marine, hydro, etc.

Registered Provider – An organisation (such as a housing association) that provides social housing, and is registered with the Regulator of Social Housing. The organisation is required to meet specific standards to protect tenants and ensure they remain financially viable and properly governed.

Regulated carbon emissions – Emissions measured through the Building Regulations Standard Assessment Procedure, which are typically associated with a building’s fixed installations for heating, hot water, cooling, ventilation, and lighting systems.

Rural Diversification - The expansion, enlargement or variation of the range of products or fields of operation of a rural business (branching out from traditional farming activities, for example new income generating enterprise like renewable energy).

Rural Exception Site – A small site used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection.

Safeguarded Land – A term to describe land that has been removed from the Green Belt to meet possible longer term development needs, beyond the current plan period.

Sequential approach/sequential test - A planning principle that seeks to identify, allocate or development certain types or locations of land before the consideration of others. For example, Brownfield housing sites before Greenfield sites, or town centre retail sites before out-of-centre sites.

Site Allocations – Sites that are proposed for development to meet the LPA’s requirements set out in the Local Plan. Policies will identify any specific requirements for individual proposals.

Soundness - A term referring to the justification of a Development Plan Document. A DPD is considered “sound” and based upon good evidence unless it can be shown to be unsound.

Spatial Development - Changes in the distribution of activities in space and the linkages between them in terms of the use and development of land.

Spatial Planning - Spatial planning goes beyond traditional land use planning to bring together and integrate policies for the development and use of land with other policies and programmes which influence the nature of places and how they function. That will include policies which can impact on land use, for example by influencing the demands on, or needs for, development, but which are not capable of being delivered solely or mainly through the granting or refusal of planning permission and which may be implemented by other means.

Special Area of Conservation (SAC) – A site designated under the EC Habitats Directive and protected for its significant nature conservation value.

Specialist Housing – Homes designed to meet specialist needs of older people and other groups, including: age restricted general market housing, retirement living or sheltered housing, extra care housing or housing with care and residential care homes and nursing homes.

Stakeholders – People who have an interest in the activities and achievements of the council, including residents, local communities of interest, partners, employees, customers, shareholders, suppliers, opinion leaders, regulators and “hard to reach” groups.

Statement of Community Involvement (SCI) – A Local Development Document (LDD) that sets out the standards which the LPA intends to achieve in relation to involving the community in the preparation, alteration and continuing review of all Local Development Documents (LDDs) and in significant development control decisions, and also how the local planning authority intends to achieve those standards.

Strategic Environmental Assessment (SEA) - A generic term used internationally to describe environmental assessment as applied to policies, plans and programmes. The SEA will form an integral part of the preparation process for all Local Development Documents (LDDs) and will be used to explain the environmental implications of policies and development as part of a Sustainability Appraisal (SA).

Strategic Flood Risk Assessment (SFRA) – Strategic Flood Risk Assessment is a tool used by the Local Planning Authority to assess flood risk for spatial planning, producing development briefs, setting constraints, informing sustainability appraisals, identifying locations of emergency planning measures and requirements for flood risk assessments.

Strategic Housing and Economic Land Availability Assessment (SHELAA) – Strategic Housing and Economic Land Availability Assessments are a key component of the evidence base to support the delivery of sufficient land for housing and employment to meet an identified need. These assessments are required by national policy set out in the National Planning Policy Framework (NPPF).

Submission Stage – The formal passing of the Development Plan Document to the Government for their assessment and examination.

Sustainable Drainage Systems (SuDS) – Measures to increase the permeability of surfaces therefore allowing a slower release of water.

Supplementary Planning Documents (SPDs) – A guidance document that supplements policies and proposals in the Local Plan. It will be subject to public consultation, but will not form part of the Development Plan or be subject to Independent Examination.

Sustainability Appraisal (SA) – The examination of a Local Development Document (LDDs) to ascertain whether its policies and proposals accord with the principles of sustainable development. The Sustainability Appraisal will incorporate a Strategic Environmental Assessment (SEA).

Sustainable Development - A widely used definition drawn up by the World Commission on Environment and Development in 1987: "development that meets the needs of the present without compromising the ability of future generations to meet their own needs". The Government has set out four aims for sustainable development in its strategy "A Better Quality of Life, a Strategy for Sustainable Development in the UK". The four aims, to be achieved at the same time, are: social progress which recognises the needs of everyone; effective protection of the environment; the prudent use of natural resources; and maintenance of high and stable levels of economic growth and employment.

Sustainable Transport - Public transport such as bus and rail, which is considered to be less damaging to the environment and which contributes less to traffic congestion than one-person car journeys.

Transit site – Gypsy/Traveller Site intended for short stays. Such sites are usually permanent, but there is a limit on the length of time residents can stay.

Travel Plan (sometimes called a 'green travel' or 'commuter' plan) - A travel plan aims to promote sustainable travel choices (for example cycling) as an alternative to single occupancy car journeys that may impact negatively on the environment, congestion and road safety. Travel Plans can be required when granting planning permission for new developments.

Travelling Showpeople - Commonly referred to as Showmen, these are a group of occupational Travellers who work on travelling shows and fairs across the UK and abroad.

Unregulated carbon emissions – Emissions generated by a building that are outside of the scope of Building Regulations, e.g. through use of energy associated with equipment such as fridges, washing machines, TVs, computers, lifts, and cooking.

Village Centre - The offer and range of facilities and services are generally the same as Large Village Centres. The difference being the catchment area is more limited by either the size of the centre, or the location of one or more centres nearby.

Vision - A brief description of how the area will be changed at the end of the plan period.

Whole Life Carbon Assessment – A full assessment of the carbon emissions resulting from the materials, construction and the use of a building over its entire life, including its demolition and disposal.

Windfall Site - A site not specifically identified in the planning process, but which unexpectedly becomes available for development during the lifetime of a plan. Most "windfalls" are referred to in a housing context.

Written Representations - A procedure by which representations on development plans and DPDs can be dealt with without the need for a full public inquiry or independent examination.

Strategic Planning Team



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