

**South Staffordshire Local Plan Review 2023-2041
Publication Plan (Regulation 19)**

**Representations of
The Bradshaws Estate**

May 2024

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Prepared By: Jamie Wallace

Status: Final

Date: 31 May 2024

For and on behalf of Avison Young (UK) Limited

1. Background and Instructions

Background

- 1.1 Mr George and Mrs Sally Beard (“the client”) are the sole owners of the landholdings known as the Bradshaws Estate and have been promoting the land for housing development since 2014. The land to which these representations relate remain excluded from development within the emerging Local Plan Review (LPR). Despite this, the promotion of the land has continued, including through engagement with South Staffordshire Council (“the Council”), key stakeholders and potential developers. In addition, technical inputs relating to the suitability and availability of the site continue to be progressed following initial assessments in 2016-2018 as part of representations to the Site Allocations Documents (**Appendix 1**).
- 1.2 The total area of the land known as the Bradshaws Estate (**Appendix 2**) extends to some 400ha, although up to 60.7ha of that is included for development within these representations. The Bradshaws Estate is located in the West Midlands Green Belt. The land proposed for development is situated in a highly sustainable location on the edge of the West Midlands Conurbation. The proposed development plots lie directly to the west of the established settlement pattern of Perton which forms part of Wolverhampton. The land therefore benefits from access to the high level of services within the Wolverhampton City Centre and the more local Perton District Centre.
- 1.3 These representations bring forward four potential development options all within the single land ownership, providing a ‘sliding scale’ in potential housing delivery and associated infrastructure. This includes:
- Option 1 – 80 bed care home and associated infrastructure including allotments and recreational grounds (Location plan included in **Appendix 3**).
 - Option 2 – 166 residential units with policy compliant affordable housing, allotments, sports pitches, ‘community hub’ biodiversity enhancement, increased pedestrian linkages and potential shuttle bus service (Location plan included in **Appendix 4**).
 - Option 3 – 850 residential units with policy compliant affordable housing, a new school, spine road, sports pitches, children’s play areas, parkland, biodiversity enhancements and local retail provision (existing) (Location plan included in **Appendix 5**).

- Option 4 – 2000 residential units with policy compliant affordable housing, a new school, spine road, sports pitches, children’s play areas, parkland, biodiversity enhancements and local retail provision (existing) (Location plan included in **Appendix 6**).
- 1.4 Perton is well located to the strategic road network, with good access to the A41 and M54 and connection to the M6. The site is located within circa 2 miles of Codsall train station and 4 miles from Wolverhpton train station, providing connections to wider region. The existing services and key transport links make Perton a strong contributor to being able to meet housing needs from the immediate locality and beyond.
- 1.5 It is acknowledged that none of the land within the Bradshaws Estate is proposed to be allocated for development in the Local Plan. The Councils proposed development strategy only allocates Green Belt sites in Tier 1 settlements where they are within walking distance to a railway station.
- 1.6 The Councils proposed development strategy seeks to meet their housing needs in full. The Councils identified housing need of **227** dwellings per annum is considered to fall significantly short of what is truly required. As set out within the accompanying Housing Needs Assessment as prepared by Marrons (**Appendix 7**), it is concluded that the housing need is in fact between **586** and **663** dwellings per annum.
- 1.7 In this context the Council will need to find additional sites to meet its true housing requirement. The land at the Bradshaws Estate would help deliver a sustainable pattern of development, offering a range of potential quantum to meet the housing needs for the area.

Instructions

- 1.8 Avison Young (“AY”) is instructed by the Bradshaws Estate to examine the South Staffordshire Council Local Plan Review Publication Plan, and its evidence base, and to reach conclusions on whether the Plan as it currently stands is sound. If we conclude that it is not sound, we are instructed to offer views on the types of Modifications that are required in order to make it sound. Our findings are set out in these Representations.
- 1.9 It should be noted that these representations rely upon the findings of the Housing Needs Assessment undertaken by Marrons. This report, prepared on behalf of the Bradshaws Estate as part of a wider consortium, has informed the conclusions on Housing Needs matters.

Soundness

- 1.10 For the Local Plan to be sound it must be:

- a) **Positively prepared** – provide a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) **Justified** – that is, an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) **Effective** – it must be deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

1.11 For reasons that we explain in subsequent Sections of these Representations, the Publication Plan is not sound as currently prepared but it is capable of being made sound with modifications.

2. Housing Need and Housing Requirement

2.1 The NPPF states that:

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

- the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”* (NPPF paragraph 11)

2.2 It goes on to state that:

“Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans.”

“Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy.”

“In order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these.”

“In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.” (NPPF paragraphs 25 – 27 and 61)

2.3 Moreover, the NPPF makes it clear that, for the Local Plan to be sound, it must be *“deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred.”*. (our emphasis)

Local Housing Need

2.4 Our client is not satisfied that the Council has correctly calculated its local housing need applying the standard method. Furthermore, it is considered that there is strong evidence to support a higher need to allow for employment growth, as well as upward adjustments for economic and affordability factors.

The correct starting point in terms of housing need, is, therefore, 364 to 441 dwellings per annum (6,552 to 7,932 over the Plan period).

Greater Birmingham and Black Country Housing Market Area - Unmet Need

- 2.5 As per the findings of the Marrons Housing Needs Assessment, the outstanding unmet need beyond the provision of existing/emerging Local Plans is approximately 101,000 homes over 22 years. A very substantial number of new homes are going to have to be delivered in the associated local authority areas in order to address what would otherwise be unmet needs.
- 2.6 The proposed contribution of 640 dwellings by South Staffordshire Council to unmet need is not considered to be satisfactory. The previously proposed contribution of 4,000 dwellings set out in the November 2022 Draft Plan for South Staffordshire remains justified and this should be the minimum contribution considered.
- 2.7 It is considered that the currently proposed contribution would inevitably result in under-delivery in housing terms. Such under-delivery would have significant social and economic consequences. In a time when we continue to fail to deliver the number of homes that the Country needs, this is simply not acceptable planning practice.
- 2.8 Unless an appropriate quantum of unmet need is addressed within the emerging Local Plan Review, the Plan will not be sound and will not be legally compliant.

The Housing Requirement

- 2.9 Planning Practice Guidance (PPG) requires local planning authorities to undertake an assessment of housing need. This assessment of housing need should be unconstrained and undertaken before considering constraints and land availability and establishing a housing requirement.
- 2.10 It would appear that South Staffordshire Council's housing requirement comprises of their unconstrained need of 4,086 dwellings in addition to the 640 dwellings for unmet housing need from the Greater Birmingham & Black Country Housing Market Area (GB&BCHMA). This equates to a total of 4,726 units or 262 units per annum.
- 2.11 In accordance with the findings of the Marrons Housing Needs Assessment the housing requirement for the plan period is at least 10,552 to 11,932 dwellings or 586 to 693 dwellings per annum. In these terms the housing requirement as presented within the emerging plan does not provide an appropriate

level of housing and it would be necessary to make changes to the site allocations in order for the plan to be found sound to accommodate the true housing requirement.

3. Development Strategy

- 3.1 The development strategy articulated within the Local Plan is built primarily on the results of the Sustainability Appraisal (“SA”).
- 3.2 Following the updates to the National Planning Policy Framework in December 2023 the Council tested further spatial strategy options to accommodate housing growth across the district. This additional testing was directly in response to the amended wording of the NPPF in that there is no requirement for Green Belt boundaries to be reviewed or changed when Local Plans are being prepared.
- 3.3 The council’s preferred approach is Spatial Option 1 - a capacity-led approach focusing growth to sustainable non-Green Belt sites and limited Green Belt development in Tier 1 settlements well served by public transport. The main focus of the growth under this preferred strategy is on non-Green Belt land at suitable existing safeguarded land sites, sustainable Open Countryside sites, and limited brownfield sites available within settlement boundaries of sustainable settlements.
- 3.4 Following the assessment of reasonable alternatives in the SA and consideration of other evidence base documents, the Council has selected two strategic development sites for allocation in the emerging Plan as set out in Policies SA1 and SA2:
- SA1: Land East of Bilbrook (Site 519); and
 - SA2: Land North of Penkridge (Sites 420, 584 and 010). N56.
- 3.5 Furthermore, the Council has selected a further 30 residential sites as set out in Policy SA3, nine sites for Gypsy and Traveller pitches set out in Policy SA4, and five employment sites set out in Policy SA5.
- 3.6 Although we support the general approach identified within the SA there remain some issues within its application which mean that the Plan is proposing a strategy that is not entirely appropriate. This is evidenced by the fact that:
- a) the revised strategy is considered to prioritise avoiding Green Belt release at the expense of meeting the true housing requirement;
 - b) the strategy places an unnecessary reliance on two strategic development sites to deliver a significant proportion of the housing requirement when additional sustainable locations exist; and
 - c) the strategy will not, therefore, deliver a sustainable pattern of development in accordance with the provisions of the NPPF.

Issues with the SA

- 3.7 SAs are notoriously complex, high level (often having no regard to available technical evidence on sites or the ability of a site to mitigate potential adverse effects) and sensitive to (i) the inputs they receive and (ii) the judgements that the authors make when assessing how options and sites perform against the SA Framework. As a consequence, errors are common and what may appear, on the surface, to be relatively minor issues can skew the results of the SA quite considerably as their effects get compounded through the various stages of SA assessment. For example, an error in stage one of the assessment can follow through into subsequent stages and result in a wholly inappropriate course of action being taken. It is critical, therefore, that more detailed (non-SA) assessments of options and sites are undertaken at relevant stages and / or the outcomes of the SA are 'sense checked' at relevant points to ensure that the SA is not generating perverse outcomes.
- 3.8 So far as we can tell, there has been no sense checking undertaken by the Council whilst developing its spatial strategy and it is plain from an inspection of the SA that errors that have been made in respect of the way that land at the Bradshaws Estate has been categorised, and then assessed in the SA.
- 3.9 For example, within Appendix I of the SA part of the land holdings within the Bradshaws Estate was scored wrongly in the following respects:
- Landscape: scored major negative impacts – The assessment fails to fairly assess the site and take into account the existing level of built development on and adjacent to the site;
 - Green Belt: scored major negative impacts – the assessment fails to properly consider the locational factors of the site against the 5 purposes of the Green Belt which is further discussed in section 4; and
 - Education: scored major negative impacts – yet the development of land at the Bradshaws Estate could deliver such infrastructure.
- 3.10 The proposed strategic allocations at Bilbrook and Penkridge scored similarly in terms of landscape and green belt impacts. Furthermore, the safeguarded land in Perton (site ref 239) which is being brought forward for development in the emerging Plan, has the same major negative impact for education with no mitigation proposed.

Consequential Issues for Development Strategy

- 3.11 Ultimately as a result of the above erroneous scoring this resulted in the rejection of the land at the Bradshaws Estate. If these scoring issues were to be corrected, in combination of a wider review of sustainable sites, which could include tier 2 settlements in the absence of suitable sites in/around tier 1 settlements, the land at the Bradshaws Estate would be a suitable allocation in the emerging Plan.
- 3.12 The Council's decision not to include any allocations at tier 2 settlements, disproportionately distributes development within the District. A properly sustainable pattern of development could be achieved by including additional suitable sites in a wider range of locations. This would better address the local needs of areas within the district.

Conclusions on Development Strategy

- 3.13 The development strategy as currently articulated is not appropriate and is not sound. The evidence underpinning it is flawed and the resulting pattern of development would not appropriately plan for the true housing requirement.
- 3.14 The development strategy must be adjusted to generate a pattern of development that is genuinely sustainable. This means, as a minimum:
- a) increasing the amount of development proposed, including allocating additional sites in sustainable locations, such as land at the Bradshaws Estate, which can deliver significant levels of infrastructure; and
 - b) reducing over reliance upon tier 1 settlements to meet the housing requirement where appropriate alternatives exist.

4. Housing Site Selection

4.1 As aforementioned, included as part of these representations are four development options relating to land west of Wrottesley Park Road Roundabout. A description for each of the development option is provide below.

Option 1 – Care Home

4.2 As per the red line included at **Appendix 3** the proposals would deliver a new standalone care home capable of housing up to 80 beds. Integral to the delivery of the care home will be enhanced landscaping and recreational grounds which will form a major component of the 0.8ha site.

4.3 The proposal would make a significant contribution towards meeting the shortfall in care facilities within the district, specifically helping to address the undersupply of 1028 beds in the locality (Perton, Codsall and Pattingham).

Option 2 – Residential Scheme (166 units)

4.4 An indicative masterplan has been provided alongside this submission (**Appendix 4**) to illustrate how the site, of circa 8.85ha, is capable of accommodating up to 166 residential dwellings, which would comprise a mix of retirement homes and affordable housing, as well as a community hub. In addition, the indicative masterplan demonstrates how playing fields, biodiversity enhancements and allotments associated with development proposals, could be accommodated on adjacent land within the wider Bradshaws Estate ownership.

4.5 Improved footpath links providing dedicated pedestrian routes to the centre of Perton and the wider countryside, including the Staffordshire Way, could also be accommodated.

4.6 Previous discussions with the Highways team included the potential to deliver a left hand turn at the junction of Wrottesley Park Road and Holyhead Road, as well as a new access into the site from Wrottesley Park Road roundabout.

Option 3 – Garden Village (850 - Residential Units)

4.7 The proposed Garden Village would include 30.03 ha of land along Wottesley Park Road and would deliver up to 850 residential units. As per the submitted red line (**Appendix 5**) the land would also incorporate the existing farm shop providing a retail service to future residents.

- 4.8 In addition to 850 new homes and policy compliant affordable housing, the proposals would include with extensive areas of open space for the purpose of creating sports pitches, children's play areas, parkland and ecological enhancement areas.
- 4.9 As well as the necessary highways infrastructure including a new access junction off Holyhead Road, a new school is proposed within the development.

Option 4 – Garden Village (2000 Residential Units)

- 4.10 Option 4 would also deliver a Garden Village with increased levels of market housing (2000) and policy compliant affordable housing. The proposed development plot would extend up to Holyhead Road and include a new access junction. The site area extends to 60.7ha as shown on **Appendix 6**.
- 4.11 The associated infrastructure enhancements would be an extension of that proposed within option 3 including a new school. Increased areas of open space, sports pitches and ecological enhancements would also be delivered.

Deliverability

- 4.12 As stated within the NPPF:

To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years.

- 4.13 In accordance with the above and as outlined within previous representations, the land at the Bradshaws Estate is suitable, available and achievable. An assessment of which is provided below.

Available

- 4.14 The land is solely within the ownership of the Applicant (Bradshaws Estate) who are in discussions with developer partners to build out the land. The land is therefore capable of being brought forward immediately.

Suitable

- 4.15 The land is well situated on the edge of Perton and within walking distance of the centre and its associated amenities and facilities. Furthermore, the land is well serviced by sustainable modes of transport, providing key links to surrounding settlements without needing to rely upon the car.

Achievable

- 4.16 In promoting the land for the development the applicant has not encountered any known technical or viability constraints.

Housing Growth - Perton

- 4.17 The Housing Site Selection Topic Paper 2024 sets out the overall approach to housing growth within Perton over the plan period. The Council does not seek to allocate additional housing growth in Perton, other than the existing safeguarded land adjacent to the village. This differs from the strategy set out for the village in the 2019 Spatial Housing Strategy and Infrastructure Delivery consultation.
- 4.18 The Council's preferred spatial housing strategy does not include releasing Green Belt in Perton. The Council concluded that no sites performed so well as to warrant departing from the preferred strategy.
- 4.19 This conclusion is however contested, the land at the Bradshaws Estate is well contained and screened and as such the proposals would not necessarily result in substantial harm to the openness of the Green Belt. Each of the five purposes of the Green Belt, in context of the land, as relevant to each potential development option, is now considered in turn below.

To check unrestricted sprawl of large built-up areas

- 4.20 The largest development option (Garden Village) would extend the settlement boundary of Perton to the west and north as far as Holyhead Road. This is not considered to result in unrestricted sprawl given the physical boundaries of the woodland to the north of Perton as well as Holyhead Road and that a reinforced tree line, along the western boundary, would be created as part of any development.
- 4.21 Residential development to the west of Perton beyond Wrottesley Park Road has already occurred on safeguarded land to the south. The site is bound to the west by residential properties at Cranmoor Lodge Farm and to the east by Wrottesley Park Road. The proposed development area incorporates the existing farm shop constituting previously developed land.

To prevent neighbouring towns merging into one another

- 4.22 The development of the site would extend the settlement boundary of Perton to the north as far as Holyhead Road, maintaining the existing gap from Codsall. Any allocation or development proposals would not increase coalescence between settlements.

To assist in safeguarding the countryside from encroachment

- 4.23 As stated above, the development of the site would extend the settlement pattern of Perton to the west and north. This encroachment westwards has already taken place to the south on the safeguarded land.
- 4.24 The existing physical features of the woodland to the south, Wrottesley Park Road to the east and the residential properties of Cranmoor Lodge Farm to the west, enclose the site from the wider countryside.
- 4.25 Additional tree planting will further enclose the site and strengthen these boundaries.

To preserve the setting and special character of historic towns

- 4.26 There are no specific heritage designations within Perton which require protection from the Green Belt.

To assist urban regeneration, by encouraging the recycling of derelict and other urban land

- 4.27 Development options 3 and 4 include PDL in the form of the existing farm shop and would create a logical extension to the settlement pattern of Perton. Given its existing close proximity to the centre of Perton, any development proposals would be able to benefit from the existing services and infrastructure within Perton.
- 4.28 The above findings and assessment are further set out within the below table.

Green Belt Purpose	Assessment	Rating
P1: To check unrestricted sprawl of large built-up areas.	The Development of the land would not result in unrestricted sprawl given the physical boundaries of the woodland to the north of Perton and that a reinforced tree line would be created as part of the development.	Moderate
P2: To prevent neighbouring towns merging into one another	Land plays no significant role due to the distance between the West Midlands conurbation and Albrighton, the nearest town to the west.	Weak/No contribution

<p>P3: To assist in safeguarding the countryside from encroachment</p>	<p>The existing physical features of the ancient woodland to the south, Wrottesley Park Road to the east and the residential properties of Cranmoor Lodge Farm to the west, enclose the site from the wider countryside.</p>	<p>Weak/No contribution</p>
<p>P4: To preserve the setting and special character of historic towns</p>	<p>Land does not contribute to the setting or special character of a historic town.</p>	<p>Weak/No contribution</p>
<p>P5: To assist urban regeneration, by encouraging the recycling of derelict and other urban land</p>	<p>Not usually considered within Green Belt Studies.</p>	<p>Strong</p>

4.29 The Councils position that Exceptional Circumstances exist, due to a shortfall in housing provision, is supported. However, the applicant does not support the position of the Council not to review the boundaries or allocate further land for housing in Perton, especially given the current development that is underway on the west side of Wrottesley Park Road.

4.30 It is considered that some of the proposed allocations and sites released from the Green Belt will result in a higher level of harm, or the same, as that at the Bradshaws Estate. The land is also able to accommodate the infrastructure requirements in the locality (highways, education).

4.31 The following material benefits, discussed further in section 5 below, make up the Exceptional Circumstances case which justifies the release of land at the Bradshaws Estate from the Green Belt:

- Affordable Housing – The proposals would be capable of making a significant contribution to the delivery of affordable homes, for which there is an identified need and has historically been underprovided for as stipulated within the accompanying Marrons report.
- Location – The site is situated in a sustainable location, within close proximity to the centre of Perton and its associated services and facilities. The site is well located in terms of access to

sustainable modes of transport including bus routes and rail. The development of the site would deliver improved pedestrian links and footpaths.

- Economic Benefits – The proposals would deliver permanent jobs on site associated with the community hub and potentially in association with the retirement homes. The development would also deliver economic benefits in the locality associated with construction and supporting existing services post construction. The development of the site would also make a contribution to meeting infrastructure requirements associated with s106 contributions/obligations.

5. Housing Delivery

- 5.1 In order for the Local Plan to be sound it must provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period. Our client's main objection to the emerging plan is that it does not do this, having incorrectly calculated the housing requirement.
- 5.2 Our client agrees that the Council should identify specific sites to satisfy the entirety of its housing requirement. We agree that this is appropriate and necessary. However, there are issues with (i) the low number of sites that it has identified; (ii) the blend of sites that it is proposing to allocate.
- 5.3 The proposed development options at the Bradshaws Estate allow for a sliding scale of development which provides a trajectory for housing development throughout the plan period. In terms of housing delivery, the key benefits of allocating land at the Bradshaws Estate includes:
- a) An allocation would be both deliverable and developable. As such the land could make a positive contribution to housing delivery through the plan period;
 - b) Option 3 and 4 could be phased so as to deliver homes deep into the plan period. This would assist the Plan in being capable of supporting an appropriate (5 years') supply of deliverable housing sites throughout its life;
 - c) the blend of sites that the Council is proposing to allocate will result in a reliance upon two strategic development sites. It is considered additional strategic sites will be required to meet the true housing requirement. In order to correct this (and (b) above), the Plan should be identifying a number of additional, large housing sites that deliver homes over a longer period and into the final years of the Plan. This could include Tier 2 settlements if considered appropriate;
 - d) as aforementioned, the Council is relying on its two main strategic sites to deliver a large proportion of new homes. This risk in respect of housing delivery is a major soundness issue and must be addressed by allocating additional land in sustainable locations; and
 - e) on the basis of the analysis that we have conducted, the Plan will not give the Council a sufficient number of deliverable housing sites at the point of adoption. This is a major soundness issue which also needs to be addressed by allocating additional land for housing in sustainable locations.

6. Draft Policies

6.1 The following commentary provides our clients feedback to the emerging policies of the Local Plan Review. The basis for the objections and the specific policies to which they relate, expand upon the comments already made within the preceding sections.

Policy DS2: Green Belt Compensatory Improvements

6.2 Our client objects to the policy as drafted.

6.3 It is not considered that there is any justification for requiring compensatory land where sites, which have demonstrated Exceptional Circumstances or Very Special Circumstances, have been removed from the Green Belt. The assumption that land designated as Green Belt infers specific ecological, land or biodiversity value is not substantiated. Where the release of Green Belt land is supported and required to meet housing needs, a standard requirement for compensatory measures is unjustified.

Policy DS4: Development Needs

6.4 Our client objects to the policy as drafted.

6.5 The accompanying Housing Needs Assessment within Appendix 7 and as outlined in section 2, details why we consider the Councils approach in identifying their housing need and housing requirement is unsound. A large component of this is due to the Councils failure to sufficiently account for the Black Country's unmet housing needs and the Councils employment growth aspirations.

Policy DS5: The Spatial Strategy to 2041

6.6 Our client objects to the policy as drafted.

6.7 Although our client supports the settlement hierarchy, further growth should be allocated within tier 2 settlements, such as Perton, ensuring the true housing need figure can be met and to allow for greater flexibility in delivery across the District. As set out in section 5 above, additional sites are required in a range of locations to provide certainty that the housing requirement will be met.

6.8 The approach to the delivery of growth is supported in principle, notably the regeneration of previously developed and brownfield land, however the likely buildout rates from such sites need to be fully considered. Given the current uncertainty in market conditions in addition to the change in market demand, a variety of sites will be required including within tier 2 settlements such as Perton.

6.9 The Councils approach to meeting housing needs in rural areas is limited to committed development in the main. Additional sources of supply should be identified in order to safeguard supply in the event of sites not coming forward as anticipated. Allowing for the delivery of homes in tier 2 settlements such as Perton, provides a buffer and increased certainty in meeting the local needs of communities.

6.10 In these terms a greater level of development should be included within rural settlements and within tier 2 settlements.

Policy HC1: Housing Mix

6.11 Our client objects to the policy as drafted.

6.12 It is acknowledged that there is a need for new development to provide for a range of housing types, sizes and tenures to meet the housing needs of district. It is however considered that the policy should allow greater flexibility for variance on a site-by-site basis, allowing for changes in the market and in demand.

Policy HC4: Homes for older people and others with special housing requirements and Policy HC5: Specialist Housing

6.13 Our client supports the policy as drafted.

6.14 The need to provide housing for older people is recognised by the government as a critical issue. It is considered that opportunities which can deliver both care and extra care housing should be supported by the Council and land allocated for such facilities where possible.

6.15 In these terms the land at the Bradshaws Estate should be brought forward to meet the needs of the ageing population.

Policy HC15: Education

6.16 Our client supports the policy as drafted.

6.17 It is entirely appropriate to recognise that strategic development opportunities are able to play a significant role in delivering much needed infrastructure including new education facilities. Indeed, it must be acknowledged without such a contribution through strategic development the educational needs of communities would not otherwise be met in full.

6.18 Proposals which allow for the delivery of education facilities should be supported and carry substantial weight in the decision-making process. Given the projected population increase and identified housing

requirement over the plan period, allocations of land which provide such infrastructure should be supported, including land at the Bradshaws Estate which would deliver such a facility.

7. Conclusions and Modifications Required to Make the Plan Sound

7.1 When a Local Plan is submitted for Examination, the plan-making authority must be satisfied that it is sound. It must not submit a Plan for Examination that it knows to be unsound, in the hope or expectation that the Examination will highlight the modifications that need to be made to make it sound.

7.2 It is clear from the analysis that we have conducted that the Local Plan is not sound in its current form. It will, therefore, need to be amended before it is submitted for Examination. The changes that need to be made to the Plan, and the key elements of its evidence base, are as follows:

Housing Needs Assessment

7.3 As detailed within the appended Housing Needs Assessment prepared by Marrons, the Council have significantly under quantified their unconstrained need to meet the forecasted employment growth within their own evidence base.

7.4 An allowance for unmet need from the GB&BCHMA should also be added, and the analysis Marrons has provided on the extent of unmet need indicates that the previous draft Plan allocation of 4,000 homes to this unmet need is justified.

7.5 The emerging plan is therefore currently unsound within its current form, having failed to robustly identify an appropriate housing requirement, based upon need, and provide a sufficient supply of sites to deliver the quantum of housing required for the plan period.

The SA and Development Strategy Evidence

7.6 The Council must correct the errors in the SA that we have identified above, including: how land at the Bradshaws Estate has been reviewed.

7.7 There must be a sense-check applied to the proposed housing allocations, including by way of a cross-comparison which examines the relative sustainability credentials of sites in different settlements. This will highlight that additional sustainable sites are available for allocation within the emerging plan.

Housing Site Allocations

7.8 Our client's land at the Bradshaws Estate should be allocated for a housing. Allocating this site will adjust the balance of growth across the District.

Appendix 1

Representations to 2017 Site Allocations Document

South Staffordshire Site Allocations Document

Representations to SAD Publication Plan Consultation on Behalf of The Bradshaw Estate

Mrs Sally Beard, Bradshaws Estates and Peter Smith Farms Limited

27 February 2017

LICHFIELDS

LICHFIELDS

Lichfields is the pre-eminent planning and development consultancy in the UK

We've been helping create great spaces
for over 50 years.

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1.0 Introduction and Summary

- 1.1 These representations have been prepared by Lichfields on behalf of Mrs Sally Beard, Bradshaws Estates and Peter Smith Farms Limited in response to the South Staffordshire Site Allocations Document (SAD) Publication Plan (January 2017). We previously submitted representations on behalf of Mrs Beard in response to the SAD Preferred Options Document (February 2016) and, subsequently, met with two Planning Officers from South Staffordshire Council in July 2016 to discuss our comments.
- 1.2 Mrs Beard is **the landowner of site 246a/467 ('Perton Green')** and adjoining land which forms part of The Bradshaw Estate, Holyhead Road. Lichfields was initially appointed in 2013 as masterplanners in relation to the promotion of the site. More recently we have focused on advising on planning strategy and this has involved monitoring the preparation of the SAD and reviewing relevant consultation documents in the context of the proposed Green Belt release on the edge of the village of Perton.
- 1.3 The Publication Plan marks the final statutory phase of consultation and, therefore, we have carefully considered the document alongside its supporting evidence base and accompanying documents. As part of our review we have considered the extent to which the Council has addressed our previous comments. These representations draw upon our earlier concerns and reiterate where they have not been addressed, either directly or more generally. We maintain our concerns in relation to the **Council's approach to** site assessments and, subsequently, the identification of the preferred site for residential development in Perton. We also continue to object to the identified area of associated safeguarded land for future residential development which is allocated through the SAD Publication Plan.
- 1.4 These representations have been prepared with due regard to the test of **'legal compliance'** (under section 20(5) (a) and section 33A of the Planning Compulsory Purchase Act 2004) and **'soundness'**. Paragraph 182 of the National Planning Policy Framework (NPPF) states that for a **plan to be considered 'sound', it must be positively prepared**, justified, effective and consistent with national policy. **For completeness and in accordance with the South Staffordshire Council's** Guidance Note, the completed Site Allocations Publication Plan Response Forms are enclosed at Appendix 1.

2.0 **Background**

- 2.1 The Site Allocations Document (SAD) Publication Plan identifies sites and sets out associated policies for a range of uses to help deliver the vision and objectives of the adopted South Staffordshire Core Strategy, including allocations for housing development (some of which are Green Belt releases).
- 2.2 Land West of Wrottesley Park Road (site ref. 239) is allocated within the Publication Plan to deliver the identified housing requirement, initially 163 dwellings, for the village of Perton. This allocation maintains the approach proposed in the previous stage of consultation where the **Council regarded site ref. 239 as the 'preferred option' for Perton.**
- 2.3 The Plan identifies site ref. 239 in three parts under three policies:
- 1 The southern extent of the site for the delivery of 163 dwellings within this plan period in Perton is identified under Policy SAD2 (Housing Allocations);
 - 2 An area of land immediately to the south of the release is identified for the required provision of open space (with Policy SAD7 (Open Space Standards) relevant to this area) .
 - 3 An area north of the proposed housing allocation is identified to be safeguarded for housing delivery within the next plan period (2028-2038). Policy SAD3 (Safeguarded Land for Longer Term Development Needs) refers.
- 2.4 The Green Belt boundary changes are addressed under Policy SAD6. In line with the above, the entire site (ref. 239) has been identified under Policy SAD6 (Green Belt, Open Countryside and Development Boundary Amendments) for removal from the Green Belt. In addition, Policy SAD6 proposes the extension of the Perton development boundary to include the southern extent of site ref. 239 which is the first to come forward through Policy SAD2 (Housing Allocations).
- 2.5 These submissions therefore relate to all four draft SAD Policies (SAD2, 3, 6 and 7).
- 2.6 The Council conclude that site ref.239 is the most appropriate site for release from the Green Belt because it has a **lesser impact on Perton's landscape character and makes less of a** contribution to the Green Belt than all other sites in Perton (Site Proformas, Appendix 1 of the Publication Plan). It remains unclear, however, why this is the case based on the SAD and the associated evidence base.
- 2.7 A review of the consultation documents, with particular regard to the Preferred Options Consultation Statement prepared by the Council, confirms that the Council has not yet provided detailed responses to previous representations.
- 2.8 We therefore maintain the representations raised at the Preferred Options consultation stage and regard these concerns as relevant to the consideration of the soundness of the SAD.
- 2.9 With regard to **paragraph 182 of the NPPF and South Staffordshire Council's Guidance Note**, the next section comments on site ref. 239 as the proposed allocation for release from the Green Belt to meet housing need in Perton with reference to the tests of soundness.

3.0 **Response to Perton Housing Allocation on Land West of Wrottesley Park Road (south) (site ref. 239)**

3.1 Paragraph 182 of the NPPF states that “*a local planning authority should submit a plan for examination which it considered is ‘sound’*”. In considering whether a plan is ‘sound’ it must be:

- 1 Positively prepared;
- 2 Justified;
- 3 Effective; and
- 4 Consistent with national policy.

Have the Perton housing allocations and associated green belt boundary changes been positively prepared?

3.2 At the Preferred Options stage, detailed work on the accessibility of individual sites had not yet been undertaken by the Highway Authority and further assessment was expected. However, discussions with Staffordshire County Council Highways regarding highway improvements at the A41 junction outside Perton had taken place.

3.3 Following assessments undertaken by Hurlstone Partnership Limited, our previous representations (Section 4.0, from paragraph 4.18, at Appendix 2) **challenged the ‘yellow’ score for ‘Highway Accessibility’ awarded to Perton Green and noted** that Perton Green is the only site in Perton which benefits from an existing access. These arrangements are capable of accommodating existing needs and future development. Highway capacity constraints at the A41 junction were also identified with only the wider Bradshaw Estate land capable of delivering significant highway improvement works. This issue was discussed at a meeting with the Council in July 2016 and it was confirmed that any essential highway/junction improvement works, such as the A41 junction, would be addressed within Infrastructure Delivery Plan.

3.4 The ‘Highways/Accessibility’ scoring for Perton Green has been positively revised to green in the SAD Publication Plan and it is noted that the “*the site is considered to have relatively good vehicular and pedestrian access to the village centre*”. However, in addition to the above reasoning, the Council states “*on reassessment and after considering representations made it is considered that all sites that would access off Wrottesley Park Road should score the same, with light green considered the most appropriate*” (Appendix G of Publication Plan Site Assessment and Discounted Sites Paper). It is not however clear within the evidence base how this view has been reached.

3.5 The National Planning Policy Guidance (PPG) states that it is important for local planning authorities to “*...undertake an assessment of transport implications in developing their Local Plan...*” to reduce “*...delays to the delivery of new development...*” (paragraph 001 ref. ID: 54-001-201410100). This should “*consider the cumulative impacts of the existing and proposed development on transport networks...*” and “*assess the quality and capacity of infrastructure and its ability to meet forecasts...*” (paragraph 003 ref. 54-003-20141010).

3.6 The Council’s Preferred Options Consultation Statement acknowledges that a number of representations commented on the limited nature of the highways assessment. However, no further explanation is provided to demonstrate how these concerns have been addressed, other than to note that further correspondence/meetings were had with the County Highways. There is no reference to works to the A41 junction within the Infrastructure Delivery Plan published

alongside the Publication Plan, and very little information/infrastructure identified for development in Perton (other than allotments and that vehicular access will be required in association with the delivery of site ref. 239).

- 3.7 The SAD Publication Plan Site Assessment Criteria Topic Paper states that, in regard to ‘Highways/Accessibility’, *“securing safe and suitable access to the highway is an essential requirement to ensuring site deliverability”* (page 8). In turn, the Methodology Paper confirms that a *“lack of suitable access”* would qualify as a ‘showstopper’ *“that would render development of the site inappropriate”* (paragraph 3.4). It is unclear from the available County Council input how the assessment of suitable site access and the ability of the highway network to accommodate the cumulative traffic has been assessed. The SAD Publication Plan Site Assessment Criteria Topic Paper states that *“as part of the process of formulating potential development options, a detailed assessment of all potential development sites has been supplied by Staffordshire County Council’s Highway Department”* (page 8), but no documentation to support this statement or inform public consultation has been provided.
- 3.8 The NPPF is clear (at paragraph 182, first bullet point) that for a plan to be regarded as positively prepared it should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements. From the material made available as part of the Publication Plan consultation phase, there is not sufficient evidence that the Council has, in consultation with the County Council, considered the infrastructure improvements required in relation to Perton for the SAD to be regarded as sound in this regard.

Are the Perton housing allocations and associated green belt boundary changes justified?

- 3.9 The NPPF recognises the need to consider reasonable alternatives, based on a proportionate evidence base, when assessing whether or not a plan is justified in terms of the soundness test. The SAD relies on a number of key assessments as central elements on the evidence base to justify the proposed allocation and Green Belt boundary changes.

Green Belt Review

- 3.10 Our previous representations identified a number of errors in how the rankings from the Green Belt Review were transferred to the Site Assessment Matrix and, in light of this, provided a corrected ranking for all sites in Perton (please refer to Section 4.0, from paragraph 4.4. , at Appendix 2). This review concluded that there is only a marginal difference between three of the potential sites for release/allocation in Perton, and that it was therefore difficult to justify disregarding Perton Green in advance of the second tier assessment (which was limited to sites ref. 239 and 407).
- 3.11 An updated Green Belt Review has been published as part of the Publication Plan evidence base which it is suggested responds to representations to the Preferred Options consultation.
- 3.12 **The updated Green Belt Review states that all sites in Perton make an equal “considerable contribution” to the purposes of the Green Belt (for different reasons).** Perton Green has however **retained a scoring of ‘red’ on the RAG scoring system in relation to** the Green Belt and, as a result, has not been taken forward to Tier 2 assessment. Perton Green is located within **Parcel 6 of the Green Belt Review and it is noted that although the parcel “has significantly fewer +++ ratings, it is the significance of the contribution of parcel 6 to safeguarding the countryside from encroachment (purpose 3) that marks it out” (p.17).** There are a number of established physical features, such as woodland blocks, which could be used to establish a new Green Belt boundary and barrier to encroachment if some land at Perton Green was released for residential development. Site ref. 239 is located within Parcel 4 of the updated Green Belt

Review. The supporting commentary contained within the appendices demonstrates that Parcel 6 is largely rated between + and ++. The only +++ is given on the basis that the Site has not **been prone to encroachment to date and, therefore is considered 'open'. Parcels 3 and 4** (containing site ref. 239), are ranked similarly, the only +++ value is also given in regards to openness and encroachment. Therefore, as stated previously, there is little difference between the contribution of these sites to the Green Belt and yet they have been scored significantly differently. On this basis, the weighting given to purpose 3 (encroachment) in assessing the sites and, thereby, promotion of site ref. 239 is unclear in the evidence base and the Green Belt Review does not sufficiently justify the published site allocation.

Landscape Sensitivity Study

- 3.13 The Bradshaw Estate's representations to the Preferred Options Consultation also commented on inconsistencies between the Landscape Sensitivity Study and the conclusions reached in the site assessment matrix, and raised some concerns about the methodology used in the study itself. These are set out in Section 4.0 (from paragraph 4.6) and Appendix 4 at Appendix 2.
- 3.14 It was argued that the **'Landscape Sensitivity'** of site ref. 239 (part of PN4) should be revised from low (green) to medium (yellow) and that the Perton Green site should be revised from high (red) to medium (yellow) to take account of the built development already on and adjacent to the site, with both sites being considered of similar landscape sensitivity.
- 3.15 In the Publication Plan Site Assessment and Discounted Sites Paper, **the 'Landscape Sensitivity'** of site ref. 239 (PN4) has been revised from green to yellow in line with our previous representations but **the 'Landscape Sensitivity' of Perton Green** (PN5) remains unchanged (red) in the Landscape Sensitivity Study. This is noted as one of the two reasons why the Perton Green site was disregarded at the end of the Tier 1 Assessment stage.
- 3.16 In addition, the **'Impact on Natural Environment'** score of Perton Green (PN5) has been revised from green to yellow. Appendix B of the Site Assessment and Discounted Sites Paper states that this reflects the Public Right of Way (PRoW) running along the edge of the site as well as clusters of TPOs, but it is unclear why the location of a PRoW is relevant to the assessment of the Natural Environment criterion.
- 3.17 The updated Landscape Sensitivity Study 2017 continues to score Perton Green as **'high landscape sensitivity' as noted at the Preferred Options stage** and there is no clear explanation given as to why site ref. 239 has been revised other than that the previous scoring had been ***"incorrectly transported from the Landscape Sensitivity Study 2015"*** (Publication Plan Site Assessment and Discounted Sites Paper, Appendix G).
- 3.18 The size of the land parcels assessed and the sudden changes in sensitivity scores within them also continues to be a concern.
- 3.19 **Overall, the Updated Landscape Sensitivity Study and the Council's approach to interpreting its findings** within the Site Assessment raise questions as to whether or not the scoring and weight given to a number of Perton sites is justified and supported by the underlying evidence base study.
- 3.20 The Landscape Sensitivity Study does not therefore sufficiently justify the chosen site allocation nor does the update to it explain associated changes to the scoring in the Publication Plan Site Assessment and Discounted Sites Paper.

Site Assessment

- 3.21 Comments submitted to the Preferred Options stage regarding the methodology used by South Staffordshire Council in determining the Preferred Options remain relevant. These are set out in Section 3.0 at Appendix 2.
- 3.22 The Council acknowledges within the Preferred Options Consultation Statement that a number of respondents *“felt that [the methodology] was flawed; too simple; that the weight given to the issues should have been different...”* The Council has not however provided any detailed response to the specific concerns raised, and has continued to use the two tiered approach to support and justify the site selection process. From the material made available as part of the Publication Plan consultation, there is no evidence to demonstrate that our previous objections and concerns have been addressed.
- 3.23 The environmental considerations remain heavily weighted at Tier 1 and as a result sites have been prematurely discounted on these grounds, thereby limiting the more qualitative assessment and the ability to appreciate the full range of benefits (e.g. social and economic factors) which could be secured through sustainable development on the identified sites. This matters because the Council is required, under NPPF paragraph 84, to take **account of “the need to promote sustainable patterns of development”**.
- 3.24 Related to the above, the use of the RAG colour scoring has continued to inform the Publication Plan. There is no clear acknowledgment of, or response to, our previous concerns that the RAG system creates a lack of transparency and, thereby, prevents a clear understanding of the ranking of sites comparative to others.
- 3.25 **The Publication Plan Methodology Paper reiterates, in reference to the ‘Issues and Options’ stage, that the RAG system was chosen because it provides a “clear, easy to understand system”** (paragraph 3.18). However, paragraph 3.25 of the Methodology Paper then states that *“a number of representations received, questioned some judgements in the evidence base studies...that underpinned site selection”* and that, subsequently, discussions were held with relevant statutory consultees to *“confirm RAG site scoring for their respective criteria.”*
- 3.26 The Council states (at para 5.5 of the SAD) that *‘there is a deliberate decision to use colour rather than numbers [in the Site Selection Methodology], as the use of numbers often implies a relative measure, which does not exist...’* The Council goes on to suggest *‘The use of colours provides a fair and consistent comparison of a single topic across all sites within a village...’* We note that the Council refers to ‘Most Favourable’ and ‘Least Favourable’ sites when explaining the scoring in the Methodology Paper, thereby accepting there needs to be a relative measure. In terms of presentation, the RAG system may be clear and easy to understand, but to achieve transparency between the scores and the justifications, it needs to be underpinned by an objective basis of assessment. The decision not to adopt numerical scoring as a more objective measure cannot therefore be justified by the need to avoid relative scoring, which is accepted and necessary in any event, but does prevent a clear understanding based on an transparent, objective and replicable methodology.
- 3.27 The Site Allocations Assessment does not therefore justify the proposed allocations for immediate development or safeguarding.

Are the Perton housing allocations and associated green belt boundary changes effective?

- 3.28 The NPPF soundness test of plan effectiveness addresses both deliverability and effective joint working on cross boundary strategic priorities, with the former being most relevant to this SAD.

- 3.29 The SAD provides limited information to secure the delivery of the allocated sites and the planning requirements expected of developers. The Infrastructure Delivery Plan is similarly limited in the detail it contains.
- 3.30 Within the Site Proforma (Appendix 1 of the Publication Plan), **under “reason(s) for site 239 being identified as a Site Allocation”, the Council state that the site has good vehicular and pedestrian access, strong boundaries, good access to amenities, additional community benefit opportunities and no major flooding issues.** However, within the same proforma for site ref. 239, the planning requirements listed as necessary for the delivery of the site include vehicular access, pedestrian access, strong landscape boundaries, connectivity to open space, allotments and sustainable drainage scheme. This overlap demonstrates a lack of consistency between what the Council consider site ref 239 can provide and what will be required in order for the proposed allocation to be delivered, and the extent of the works necessary to bring forward development of the allocated site is unclear.
- 3.31 More information is needed to ensure the correct sites for both immediate release and safeguarding for future development have been chosen, the allocated sites are deliverable and the SAD is effective.

Are the Perton housing allocations and associated green belt boundary changes consistent with national policy?

National Planning Policy

- 3.32 The National Planning Policy Framework (NPPF) sets out policy to significantly boost the supply of housing at paragraphs 47 to 55. Green Belt policy most relevant to plan making is set out at NPPF paragraphs 79 to 86.
- 3.33 Paragraph 81 of the NPPF states that *“once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access, to provide opportunities for outdoor sport and recreation; to retain and enhance landscape, visual amenity and biodiversity...”*
- 3.34 Paragraph 83 states that, when altering Green Belt boundaries through the preparation of the **Local Plan (which includes the SAD)**, *‘authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.’*
- 3.35 Paragraph 84 states that *“When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development”*
- 3.36 Paragraph 85 states that local authorities should, inter alia, not include land within the Green Belt which it is unnecessary to keep permanently open and use physical features that are readily recognisable and likely to be permanent to define boundaries. The allocated and safeguarded sites do not provide the necessary boundaries, whereas existing landscape and physical features surrounding Perton Green (site 246a/467) offer the opportunity to establish clear boundaries and provide greater containment.
- 3.37 The approach taken in the SAD is not consistent with the NPPF, including the above policies. There is insufficient evidence that the Council has given due regard to establishing boundaries which are permanent and likely to endure, of the need to promote sustainable patterns of development. The Council recognises **that** “in order to provide the most sustainable development possible in our villages, the Core Strategy also supports the delivery of mixed use sites, where uses other than housing would be considered as part of the scheme of where

community benefit may be delivered on site” (paragraph 7.8 of the Publication Plan), but this approach does not appear to have been consistently adopted in the identified site allocations. In the case of Perton, a range of community benefits have been identified as deliverable at Perton Green (see below) but these appear to have been afforded relatively little weight, notwithstanding the fact that some of these, such as the farm shop and footpaths, are existing benefits already provided to the local community which will be enhanced as part of the proposals for the Parton Green site.

- 3.38 The allocation of site ref. 239 has not been shown to be consistent with national policy and the Council needs to demonstrate that its approach to the preparation of the SAD and the resulting draft document are consistent with national policy, both in terms of the allocation for development and the safeguarded area. Perton Green has been identified as a site which could deliver sustainable development and accommodate safeguarded land in a manner consistent with national policy. It therefore merits further detailed consideration.

4.0 **Changes Necessary for Soundness**

4.1 In order to progress a ‘sound’ SAD Publication Plan (in accordance with paragraph 182 of the NPPF), we conclude that the Council needs to address the following matters:

- 1 Infrastructure Delivery Plan – in consultation with the County Council, provide detail on the highway and access works/improvements and other infrastructure required to enable the delivery of housing in Perton and elsewhere, including costs to demonstrate the SAD is deliverable.
- 2 Green Belt Review – review the scoring based on a clear, transparent and objective approach to ensure the plan is justified by evidence.
- 3 Landscape Sensitivity Study – review the scorings provide a clear, transparent and objective approach to ensure the plan is justified by evidence.
- 4 Site Assessment Methodology – review the two tier approach and the weighting of criteria to ensure an effective and transparent approach, so that the plan is based on objective evidence.
- 5 Site Proforma – provide comprehensive planning requirements for site delivery.

The ‘Perton Green’ Site (246a/467) as an Alternative

4.2 The Bradshaw Estate maintains that Perton Green (site ref. 246a/467) is appropriate for development and should be the preferred site for release from the Green Belt for the delivery of housing within Perton, a view shared by Perton Parish Council. The Bradshaw Estate suggests that work to address the above soundness concerns will demonstrate, through the necessary objective analysis, that the Perton Green site should be allocated for residential development.

4.3 Perton Green offers the certainty of a number of benefits which can be provided both within the Plan period and the longer term. As the Council has not considered the site against tier two assessment criteria, these benefits have not been fully recognised in the preparation of the SAD. In summary:

- 1 An existing Class A1 shop operates on the site. This not only establishes built development on the site but also offers wider community benefits in the form of utilising an already locally frequented shop to create a community facilities hub for both existing and new residents.

- 2 The site benefits from an existing access off Wrottesley Park Road and, therefore, does not require significant investment in infrastructure for its delivery. It is also the only site within Perton which can directly contribute additional land for the delivery of highway improvement works at the A41 junction and improve local traffic congestion for the whole of Perton.
- 3 An existing public footpath runs along the edge of the site. This provides opportunities for improving access to both the Green Belt and links with Perton and miles of footpaths within the wider Countryside, including the Staffordshire Way.
- 4 The existing ancient woodland provides strong containment and screening which will ensure that the visual amenity of the Green Belt is retained. It similarly contributes to maintaining a high quality landscape in the interest of future residential amenity.
- 5 The physical landscape features within the site (existing woodland and historic hedgerows) can similarly be used to naturally define the Green Belt boundary.
- 6 The site can provide flood mitigation measures where required to manage any localised surface water flood risk.
- 7 There is significant capacity on the site to deliver up to 166 new homes and provide on-site open space and green infrastructure provision (playing fields and allotments).

4.4 In addition to the above and **as discussed with the Council in July 2016, the site's position** within the wider Bradshaw Estate means that the extent of land brought forward for development can be discussed in the interest of both the local community and the future delivery of South Staffordshire Council's housing requirements. In line with paragraph 84 of the NPPF and encouraging sustainable patterns of development, there is scope to deliver 163 dwellings within the Plan period and safeguard land for development beyond the plan period within a revised and identifiable Green Belt boundary which will endure.

5.0 Concluding Remarks

- 5.1 These representations identify a number of ongoing and unresolved concerns with the SAD which have not been addressed or explained in the Publication Plan and the supporting evidence base documents. These relate to both the overall methodology used by the Council and the specific assessment of the Perton sites (please refer to Section 5.0 at Appendix 2).
- 5.2 We have also identifies further inconsistencies despite the reassessment undertaken by the Council.
- 5.3 **We therefore conclude that further work is needed to ensure the SAD can be regarded as 'sound'** at Examination, including an objective review of the sites to be allocated for release for residential development in Perton.
- 5.4 We trust that the enclosed representations are clear and **look forward to receiving the Council's** response in due course. The Bradshaw Estate would welcome further discussions with the Council if these would assist the SAD preparation process.

Appendix 1: Representation Forms



South Staffordshire Council

Site Allocations Publication Plan Response Form

Part A: Your Details (Please Print)

Please ensure that we have an up to date email wherever possible, or postal address at which we can contact you.

	Your Details	Agent's Details (if applicable)
Title	Mrs	Mr
First Name	Sally	Nick
Last Name	Beard	Baker
E-mail Address		nick.baker@lichfields.uk
Job Title (if applicable)		Planning Director
Organisation (if applicable)	Bradshaws Estates and Peter Smith Farms Limited	Lichfields
Address	C/O Agent	14 Regent's Wharf All Saints Street London
Post Code		N1 9RL
Telephone Number		020 7837 4477

Please note the following:

- *Representations cannot be kept confidential and will be available for public scrutiny, however your contact details will not be published.*
- *Your details will be added to our Local Plans Consultation database.*

All comments made at the Preferred Options stage have been taken into account in the production of the Publication Plan and will be submitted to the Inspector. The Publication Plan is a regulatory stage and any representations should relate to the legal compliance and soundness of the document.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change as there will not normally be a subsequent opportunity to make further representations.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Part B: Please use a separate sheet for each representation

Please complete a new form for each representation you wish to make.

1. To which part of the Site Allocations (SAD) Publication Plan does this representation relate?

Paragraph	
Policy	SAD2 (HOUSING ALLOCATIONS)
Proposals Map	

2. Do you consider the Site Allocations Publication Plan is **Legally Compliant**?

Yes		No	
-----	--	----	--

Please give reasons for your answer. Please be as precise as possible:

3a. Do you consider the Site Allocations Publication Plan to be **Sound**?

Yes		No	
-----	--	----	--

3b. Do you consider the Publication Plan to be **unsound**, because it is not:

	<i>Tick</i>
Positively Prepared: The plan should be prepared based on a strategy, which seeks to meet objectively assessed development and infrastructure requirements.	
Justified: The plan should be the most appropriate strategy, when considered against the reasonable alternatives.	
Effective: The plan should be deliverable.	
Consistent with national policy: The plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.	

Please give reasons for your answer. Please be as precise as possible:

<p>PLEASE SEE ENCLOSED REPORT</p>

4. Please set out below what change(s) you consider necessary to make the Publication Plan sound or if you wish to support the legal compliance or soundness of the document.

<p>PLEASE ENCLOSED REPORT</p>

5. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

	<i>Tick</i>
No , I do not wish to participate at the oral examination	
Yes , I wish to participate at the oral examination	

6. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

<p>IN ORDER TO EXPLAIN THESE REPRESENTATIONS AND RESPOND TO COMMENTS AND QUESTIONS TO ASSIST THE INSPECTOR.</p>

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature		Date	27.02.17
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All comments should be made in writing using this form by email, or post or by letter.

Email:

sadconsultation@sstaffs.gov.uk

Post:

Local Plans Team
Planning and Strategic Services,
South Staffordshire Council Offices,
Wolverhampton Road,
Codsall,
South Staffordshire,
WV8 1PX

**Your completed representation must be received by
12 noon on Monday 27th February 2017**



South Staffordshire Council

Site Allocations Publication Plan Response Form

Part A: Your Details (Please Print)

Please ensure that we have an up to date email wherever possible, or postal address at which we can contact you.

	Your Details	Agent's Details (if applicable)
Title	Mrs	Mr
First Name	Sally	Nick
Last Name	Beard	Baker
E-mail Address		nick.baker@lichfields.uk
Job Title (if applicable)		Planning Director
Organisation (if applicable)	Bradshaws Estates and Peter Smith Farms Limited	Lichfields
Address	C/O Agent	14 Regent's Wharf All Saints Street London
Post Code		N1 9RL
Telephone Number		020 7837 4477

Please note the following:

- *Representations cannot be kept confidential and will be available for public scrutiny, however your contact details will not be published.*
- *Your details will be added to our Local Plans Consultation database.*

All comments made at the Preferred Options stage have been taken into account in the production of the Publication Plan and will be submitted to the Inspector. The Publication Plan is a regulatory stage and any representations should relate to the legal compliance and soundness of the document.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change as there will not normally be a subsequent opportunity to make further representations.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Part B: Please use a separate sheet for each representation

Please complete a new form for each representation you wish to make.

1. To which part of the Site Allocations (SAD) Publication Plan does this representation relate?

Paragraph	
Policy	SAD3 (Safeguarded Land for Longer Term Development Needs)
Proposals Map	

2. Do you consider the Site Allocations Publication Plan is **Legally Compliant**?

Yes		No	
-----	--	----	--

Please give reasons for your answer. Please be as precise as possible:

3a. Do you consider the Site Allocations Publication Plan to be **Sound**?

Yes		No	
-----	--	----	--

3b. Do you consider the Publication Plan to be **unsound**, because it is not:

	<i>Tick</i>
Positively Prepared: The plan should be prepared based on a strategy, which seeks to meet objectively assessed development and infrastructure requirements.	
Justified: The plan should be the most appropriate strategy, when considered against the reasonable alternatives.	
Effective: The plan should be deliverable.	
Consistent with national policy: The plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.	

Please give reasons for your answer. Please be as precise as possible:

<p>PLEASE SEE ENCLOSED REPORT</p>

4. Please set out below what change(s) you consider necessary to make the Publication Plan sound or if you wish to support the legal compliance or soundness of the document.

PLEASE ENCLOSED REPORT

5. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

	<i>Tick</i>
No , I do not wish to participate at the oral examination	
Yes , I wish to participate at the oral examination	

6. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

IN ORDER TO EXPLAIN THESE REPRESENTATIONS AND RESPOND TO COMMENTS AND QUESTIONS TO ASSIST THE INSPECTOR.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature		Date	27.02.17
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All comments should be made in writing using this form by email, or post or by letter.

Email:

sadconsultation@sstaffs.gov.uk

Post:

Local Plans Team
Planning and Strategic Services,
South Staffordshire Council Offices,
Wolverhampton Road,
Codsall,
South Staffordshire,
WV8 1PX

**Your completed representation must be received by
12 noon on Monday 27th February 2017**



South Staffordshire Council

Site Allocations Publication Plan Response Form

Part A: Your Details (Please Print)

Please ensure that we have an up to date email wherever possible, or postal address at which we can contact you.

	Your Details	Agent's Details (if applicable)
Title	Mrs	Mr
First Name	Sally	Nick
Last Name	Beard	Baker
E-mail Address		nick.baker@lichfields.uk
Job Title (if applicable)		Planning Director
Organisation (if applicable)	Bradshaws Estates and Peter Smith Farms Limited	Lichfields
Address	C/O Agent	14 Regent's Wharf All Saints Street London
Post Code		N1 9RL
Telephone Number		020 7837 4477

Please note the following:

- *Representations cannot be kept confidential and will be available for public scrutiny, however your contact details will not be published.*
- *Your details will be added to our Local Plans Consultation database.*

All comments made at the Preferred Options stage have been taken into account in the production of the Publication Plan and will be submitted to the Inspector. The Publication Plan is a regulatory stage and any representations should relate to the legal compliance and soundness of the document.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change as there will not normally be a subsequent opportunity to make further representations.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Part B: Please use a separate sheet for each representation

Please complete a new form for each representation you wish to make.

1. To which part of the Site Allocations (SAD) Publication Plan does this representation relate?

Paragraph	
Policy	SAD6 (Green Belt, Open Countryside and Development Boundary Amendments)
Proposals Map	

2. Do you consider the Site Allocations Publication Plan is **Legally Compliant**?

Yes		No	
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Please give reasons for your answer. Please be as precise as possible:

3a. Do you consider the Site Allocations Publication Plan to be **Sound**?

Yes		No	
-----	--	----	--

3b. Do you consider the Publication Plan to be **unsound**, because it is not:

	<i>Tick</i>
Positively Prepared: The plan should be prepared based on a strategy, which seeks to meet objectively assessed development and infrastructure requirements.	
Justified: The plan should be the most appropriate strategy, when considered against the reasonable alternatives.	
Effective: The plan should be deliverable.	
Consistent with national policy: The plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.	

Please give reasons for your answer. Please be as precise as possible:

<p>PLEASE SEE ENCLOSED REPORT</p>

4. Please set out below what change(s) you consider necessary to make the Publication Plan sound or if you wish to support the legal compliance or soundness of the document.

PLEASE ENCLOSED REPORT

5. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

	<i>Tick</i>
No , I do not wish to participate at the oral examination	
Yes , I wish to participate at the oral examination	

6. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

IN ORDER TO EXPLAIN THESE REPRESENTATIONS AND RESPOND TO COMMENTS AND QUESTIONS TO ASSIST THE INSPECTOR.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature		Date	27.02.17
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All comments should be made in writing using this form by email, or post or by letter.

Email:

sadconsultation@sstaffs.gov.uk

Post:

Local Plans Team
Planning and Strategic Services,
South Staffordshire Council Offices,
Wolverhampton Road,
Codsall,
South Staffordshire,
WV8 1PX

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South Staffordshire Council

Site Allocations Publication Plan Response Form

Part A: Your Details (Please Print)

Please ensure that we have an up to date email wherever possible, or postal address at which we can contact you.

	Your Details	Agent's Details (if applicable)
Title	Mrs	Mr
First Name	Sally	Nick
Last Name	Beard	Baker
E-mail Address		nick.baker@lichfields.uk
Job Title (if applicable)		Planning Director
Organisation (if applicable)	Bradshaws Estates and Peter Smith Farms Limited	Lichfields
Address	C/O Agent	14 Regent's Wharf All Saints Street London
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After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Part B: Please use a separate sheet for each representation

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Paragraph	
Policy	SAD7 (Open Space Standards)
Proposals Map	

2. Do you consider the Site Allocations Publication Plan is **Legally Compliant**?

Yes		No	
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3a. Do you consider the Site Allocations Publication Plan to be **Sound**?

Yes		No	
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3b. Do you consider the Publication Plan to be **unsound**, because it is not:

	<i>Tick</i>
Positively Prepared: The plan should be prepared based on a strategy, which seeks to meet objectively assessed development and infrastructure requirements.	
Justified: The plan should be the most appropriate strategy, when considered against the reasonable alternatives.	
Effective: The plan should be deliverable.	
Consistent with national policy: The plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.	

Please give reasons for your answer. Please be as precise as possible:

<p>PLEASE SEE ENCLOSED REPORT</p>

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	<i>Tick</i>
No , I do not wish to participate at the oral examination	
Yes , I wish to participate at the oral examination	

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Signature		Date	27.02.17
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All comments should be made in writing using this form by email, or post or by letter.

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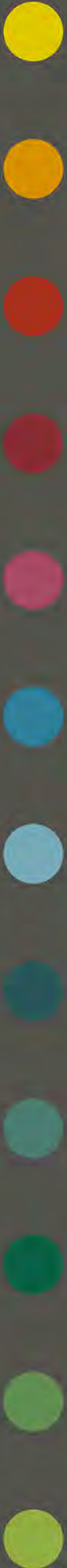
sadconsultation@sstaffs.gov.uk

Post:

Local Plans Team
Planning and Strategic Services,
South Staffordshire Council Offices,
Wolverhampton Road,
Codsall,
South Staffordshire,
WV8 1PX

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Appendix 2: Response to SAD Preferred Options Consultation (February 2016)



Nathaniel Lichfield
& Partners
Planning. Design. Economics.

**South Staffordshire Site Allocations
Document**

***Response to SAD Preferred Options
Consultation***

On behalf of:

Mrs Sally Beard, The Bradshaws Estate

11 February 2016

41194/NT/CC

Nathaniel Lichfield & Partners
14 Regent's Wharf
All Saints Street
London N1 9RL

nlplanning.com

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Registered Office:

14 Regent's Wharf

All Saints Street

London N1 9RL

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Executive Summary

These representations have been prepared by Nathaniel Lichfield & Partners on behalf of Mrs Sally Beard (landowner of site 246a/467 and The Bradshaws Estate) in response to the South Staffordshire Site Allocations Document (SAD) Preferred Options consultation.

NLP has considered the Site Allocations Document Preferred Options, alongside the accompanying Sustainability Appraisal. Our representations focus on the proposed green belt release of a site within Perton and include an assessment of the overall approach taken by the Council as well the detailed site assessments. We raise the following key points:

Methodology

- 1 The use of a two-tier site selection process is heavily weighted to the consideration of environmental constraints, especially in the first stage (Tier 1), rather than balancing environmental, social and economic matters. Consequently, the need to promote sustainable patterns of development (NPPF para 84) has not been adequately addressed.
- 2 The RAG scoring and relative weighing of the different site assessment criteria lacks transparency and robustness.

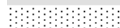
Tier 1 Site Assessment of site 246a/467 and other Perton sites

- 3 Significant ranking errors with the LUC Green Belt Review which overstate to the contribution of the Perton Green site to green belt purposes.
- 4 The Landscape Sensitivity Report fails to fairly assess the Perton Green site and take into account the existing level of built development on and adjacent to the site.
- 5 There are no flood risk or surface water drainage issues which justify a lower ranking of the Perton Green site in comparison to others.
- 6 The Perton Green site is uniquely able to deliver significant improvements to the A41 junction and in terms of highways access is not constrained.
- 7 The Perton Green site is of lower agricultural land value compared to others around Perton and this should be a key factor in assessing the 'impact on land use and loss of facilities' (rather than the 'loss of green belt land').
- 8 The significance of the Historic Environment Record is unclear and the 'potential' below ground consideration can be adequately addressed through further site investigation and should not be used as a basis to differentiate between the Perton sites

The updated Tier 1 assessment (below) takes account of these and other matters, and demonstrates the strengths and clear relative merits of the Perton Green site as a location for promoting "*sustainable patterns of development*" in

accordance with NPPF para 84. The high ranking of Perton Green at this Tier 1 stage justifies its consideration at the second (Tier 2) stage in order to fully understand and assess the overall contribution the Perton Green site will make to promoting sustainable patterns of development, as without the Tier 2 assessment the full range of social and economic benefits this site would deliver are not included in the Council’s assessment.

Corrected Perton Sites Tier 1 Scoring & Ranking

Perton Site ref	Sequ. Test	Green Belt	Landscape Sensitivity	Access to Amenities	Surface Water Flooding	Highways Access.	Impact on Land Use and Loss of Facilities	Natural Environ.	Environ. Quality	Impact on Historic Environ./ Heritage	Total	Ranking
238a		5	4	2	2	3	3	2	2	2	25	3
239		3	3	2	2	2	3	2	2	2	21	2
241		5	5	3	2	5	2	3	2	2	29	5
246a/467		4	3	2	2	1	2	2	2	2	20	1
402		5	5	5	1	4	2	2	2	2	28	4
407		2	4	2	2	2	2	3	2	2	21	2
454		5	5	3	2	5	2	3	2	2	29	5
Weighted Scores		Extr. High	High	High	High	High	High	Medium	Medium	Medium		
Weighting Factor		3	2	2	2	2	2	1	1	1		
238a		15	8	4	4	6	6	2	2	2	49	4
239		9	6	4	4	4	6	2	2	2	39	3
241		15	10	6	4	10	4	3	2	2	56	6
246a/467		12	6	4	4	2	4	2	2	2	38	2
402		15	10	10	2	8	4	2	2	2	55	5
407		6	8	4	4	4	4	3	2	2	37	1
454		15	10	6	4	10	4	3	2	2	56	6
 Score change from SSC Site Assessment (see Appendix 6 for details)												

Tier 2 Assessment of Perton Green (246a/467)

On the basis of this corrected Tier 1 scoring the site has been considered against the Council’s Tier 2 assessment criteria. The Perton Green site performs strongly in relation to:

- 1 Community Views, being the Parish Council’s preferred option and attracting significant local support at consultation events;
- 2 Community Infrastructure Opportunities, with the established Perton Farm Shop able to form part of a new community facilities hub to serve existing and new residents;
- 3 Economic Opportunities, with existing employment opportunities on the site and the early delivery of development offering additional local economic benefits and local authority revenue;
- 4 Opportunities for Open Space, Green Infrastructure and Recreation Facilities, in terms of both significant on-site provision and links to existing footpath and bridleway networks;
- 5 Use of Natural Boundaries, with the existing woodland and landowner-led advance planting providing strong containment and screening; and

- 6 Community Safety, with a range of proposed uses generating activity and natural surveillance and opportunities for highway works to provide safety benefits.

Perton Green Masterplan

The updated Masterplan for the site (Appendix 1) demonstrates the following sustainable development benefits:

- 1 Approximately 160 new homes for local people, including retirement homes and affordable housing. In addition, space for safeguarded land to provide housing in the long term future if needed.
- 2 Community hub and village green at the heart of the development.
- 3 Highway improvements to reduce congestion at the A41 junction resulting in wider environmental quality improvements.
- 4 Playing fields and allotments for residents to use.
- 5 On-site access to amenities, through the existing farm shop.
- 6 Improved footpath links with Perton and the wider countryside.
- 7 New planting and existing hedgerows to screen the development.
- 8 A high quality residential environment set in high quality landscaping and ensuring residential amenity is maintained.

Overall, on the basis of the key considerations identified by the Council (at Tier 1 and 2) and a fair assessment of the Perton sites against these matters, it is clear that the Perton Green site should be considered the 'preferred option' within the Site Allocation Document. The masterplan which accompanies these representations demonstrates a landowner commitment to securing an appropriate extension to Perton to meet urgent local housing needs. Perton Green (Site 246a/467) is capable of delivering of a sustainable pattern of development at an early stage in the plan period.

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- Appendix 1 Perton Green Masterplan
- Appendix 2 246a/467 Site Boundary Extracts
- Appendix 3 Green Belt Review
- Appendix 4 Landscape Quality
- Appendix 5 Hurlstone Partnership Letter (9 February 2016): Highways Review
- Appendix 6 Corrected Perton Sites Tier 1 Scoring & Ranking
- Appendix 7 Review of Community Consultation
- Appendix 8 Perton Parish Council Letter (16 May 2014)

1.0 Introduction

- 1.1 These representations have been prepared by Nathaniel Lichfield & Partners on behalf of Mrs Sally Beard in response to the South Staffordshire Site Allocations Preferred Options Document. Mrs Beard has previously submitted representations to earlier stages of work relating to the Site Allocations Document (SAD) and has been actively engaged in the work undertaken over the last year by the Local Plan team within South Staffordshire Council (SSC).
- 1.2 Mrs Beard is the landowner of site 246a/467 and adjoining land which forms part of The Bradshaws Estate, Holyhead Road. Since 2013 Nathaniel Lichfield & Partners (NLP) has been appointed as masterplanners in relation to the promotion of the site, whilst more recently we have been appointed to advise on planning strategy and undertake a review of the various elements of the evidence base underpinning the Site Allocations.
- 1.3 NLP has carefully considered the Site Allocations Document Preferred Options, alongside the accompanying Sustainability Appraisal and technical papers in the context of the proposed green belt release with respect to the village of Perton. Following a detailed review of the accompanying methodology papers and evidence base documents we have some comments on both the overall approach taken by the Council in determining the Preferred Options and the detailed Site Assessments of the Perton sites.
- 1.4 These representations also provide an alternative assessment of the Perton Green site (SSC site ref: 246a/467) against the Council's site assessment criteria, which it is considered should be used instead of that outlined in the Preferred Options and accompanying Site Assessment Matrix. This revised evaluation of the site addresses a number of inconsistencies in the assessment and should be considered prior to the submission of the document to the Secretary of State for Examination.
- 1.5 These representations have been prepared in the context of the National Planning Policy Framework (NPPF), including the soundness tests, which should form the basis for plan making, specified at para 182. i.e. positively prepared, justified, effective and consistent with national policy. These include making sure the plan is the most appropriate strategy, when considered against reasonable alternatives, based on proportionate evidence.

Report Structure

- 1.6 This Report is structured as follows:
- a Section 2.0 briefly describes the site and its context and confirms the site boundary for the Perton Green site;
 - b Section 3.0 comments on the overall methodology taken by SSC on identifying the site allocations;
 - c Section 4.0 considers the individual scoring of the Perton sites;

- d Section 5.0 provides an alternative site assessment of the site; and
- e Section 6.0 provides our conclusions on the key points which need to be addressed prior to the SAD submission to ensure soundness.

2.0 **Perton Green Site**

- 2.1 The Perton Green site is located to the northwest of Perton, approximately 8km from Wolverhampton. It is currently in agricultural use with an existing farm shop and associated development located on the northern part of the site. The farm shop includes a number of buildings and a large area of hardstanding used for car parking and servicing.
- 2.2 The eastern boundary of the site is formed by Wrottesley Park Road which runs north from Perton to the A41. The site is connected to the village centre, via the 'Parkway', which forms the eastern arm of the existing roundabout with Wrottesley Park Road, adjacent to the site. The site is approximately 1.5km from the village centre.
- 2.3 To the south west and west of the site is the Cranmoor Lodge development. This small settlement includes approximately 20 residential properties in a series of converted buildings.
- 2.4 The site is bounded by trees and existing hedgerows on a number of sides. To the south of the site is a small woodland coppice known as Stafford Rough. The site is relatively flat, rising gradually from east to west.
- 2.5 The Staffordshire Way and Monarch's Way public rights of way run along part of the western edge of the site.

Site Boundary Confirmation

- 2.6 Within the current and previous stages of consultation there appears to have been some confusion regarding the land within Mrs Beard's ownership which is being promoted for allocation. The parcel boundary for site 246a/467 has been subject to change during the SAD preparation process. The increased site boundary suggested in March 2014 (from 246a to 467) was suggested at the Council's invitation in response to the suggestion that further safeguarded land was needed to meet the long-term housing need, beyond the plan period. Mrs Beard has extensive land holdings in this area and was seeking to demonstrate that sufficient space is available to meet current and future need, should it be required.
- 2.7 For clarity, the relevant extracts from the previous SAD consultations are included at Appendix 2, which detail the parts of the site currently under consideration.
- 2.8 The latest masterplan for the site (drawing ref: IL41194-020-RevB; Appendix 1) demonstrates that the minimum housing number for Perton (163 dwellings) could be accommodated with the southern part of the Site Allocations parcel boundary (site 246a), with land to the north of Cranmoor Lodge (also within site 246a) safeguarded for the additional 175 dwellings required beyond the plan period. The additional land to the north, which forms part of the wider 467 site could accommodate green infrastructure, such as community allotments and

playing fields. These uses are appropriate for the Green Belt and therefore this part of the site could be retained within the Green Belt if required.

- 2.9 It is suggested therefore that the land identified by the Issues & Options consultation (site 246a) is broadly sufficient to accommodate the current housing requirement, including the safeguarded land. The extended area (site 467) would only be necessary to provide space for the community hub facilities and the access route from the existing farm shop.
- 2.10 The layout illustrated on the masterplan (excluding the safeguarded land and the land adjacent to the farm shop, proposed for playing fields and allotments) would accommodate 163 units at a broad average density of 25/30 dwellings per hectare (as suggested as the capacity average by the Site Allocations Issues and Options).

3.0 **SAD Methodology**

- 3.1 Overall, there are a number of significant concerns with regard to the methodology used by South Staffordshire to select the Preferred Options, including the following:
- a The use of a two-tier site selection process is heavily weighted to the consideration of environmental constraints, especially in the first stage (Tier 1), rather than balancing environmental, social and economic matters. Consequently, the need to promote sustainable patterns of development (NPPF para 84) has not been adequately addressed.
 - b The RAG scoring and relative weighing of the different site assessment criteria lacks transparency and robustness.

Two Tier Selection Process

- 3.2 Our client objects to the general approach taken in using a two tier selection process, which dismissed, at an early stage, sites which otherwise would score strongly overall. There is no justification provided for why more qualitative matters, such as community views, community infrastructure and opportunities for open space are only considered as part of the Tier 2 assessment which is limited to the higher performing sites only. These qualitative factors are important considerations and should have been taken into consideration as part of the main site assessment.
- 3.3 The NPPF para 84 notes that when drawing up or reviewing Green Belt boundaries “*local planning authorities should take account of the need to promote sustainable patterns of development*”. The three dimensions (economic, social and environmental) of sustainable development are noted at para. 7 of the NPPF. The Tier 1 site selection criteria appears to be heavily weighted towards ‘environmental’ matters, whereas social and economic considerations are only given significant weighting in the second tier of the selection process. On this basis the methodology used does not take account of “*sustainable patterns of development*” in accordance with para. 84 and the wider definition of sustainable development.
- 3.4 Given that only limited additional matters were considered as part of the Tier 2 assessment and it may only have been appropriate to consider green belt locations in more detail, only a small amount of further work would have been necessary to incorporate these matters into a single comprehensive assessment of each site in green belt locations such as Perton.
- 3.5 It is also noted that the Tier 2 assessment process does not appear to have been undertaken in a methodical or comprehensive way. The extent of the assessment is only a few brief high level comments against each of the sites being considered as part of Tier 2. Whilst these are qualitative matters it would still have been possible to score or rank the sites against the site selection

criteria to show how the judgement had been reached and how much weighting had been applied to each category.

RAG Scoring and Weighting

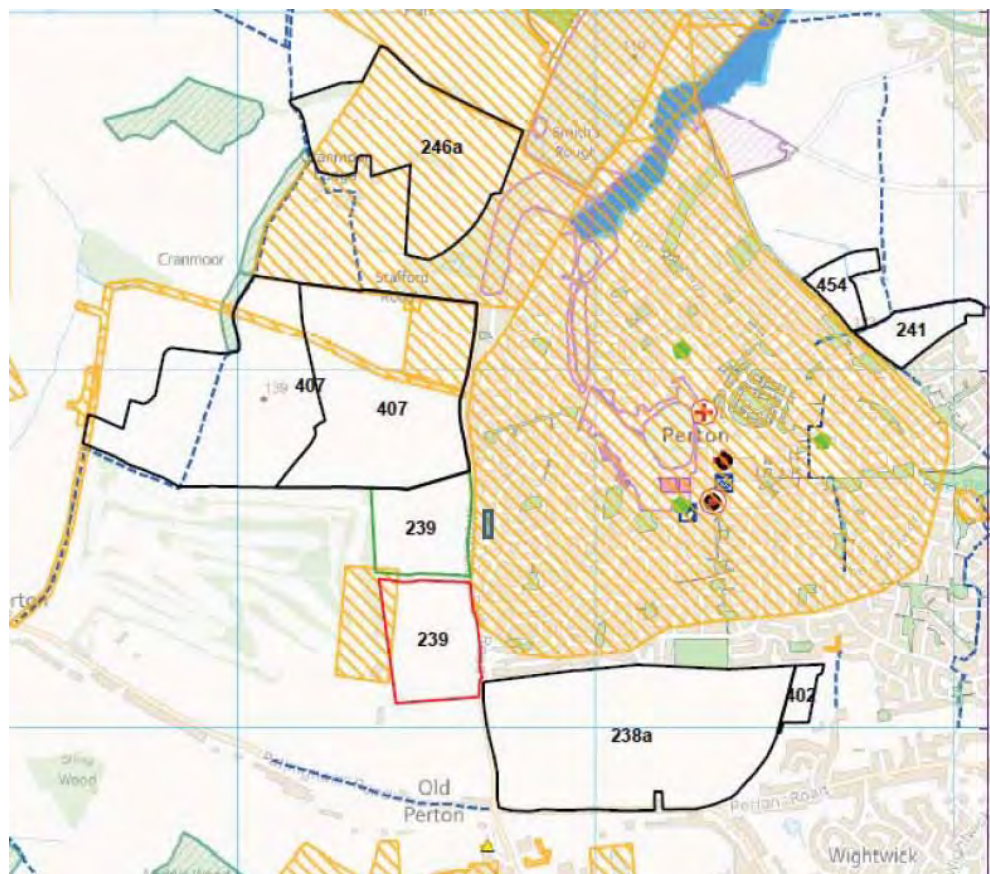
- 3.6 The RAG colour scoring is not an appropriate method for ranking the sites. The use of colours does not allow for clear and transparent overall ranking of the sites in comparison to each other. It is noted, at para 5.5 of the Site Allocations Document, that the Council made a deliberate decision to use colour rather than numbers, "*as the use of numbers was considered to imply a relative measure*". In these circumstances it would have been entirely appropriate for the sites to have been ranked relatively to each other, in order to allow for an accurate and transparent assessment of how each site performed and which performed best. The very purpose of the assessment process is to identify the judgements made against the sites and identify the preferred option in a clear and transparent way.
- 3.7 Furthermore, relative number scoring has been used elsewhere in the evidence base, for example by LUC in the Green Belt Review. If it was considered appropriate in relation to the Green Belt Review then why was it discounted as a method for the overall assessment of the sites?
- 3.8 The accompanying paper explaining the matrix assessment criteria (SAD Preferred Options Matrix Topic Paper) implies that relative weightings have been afforded to the individual topics under consideration. For example, it is noted on page 22 that the "historic environment" is weighted as being of medium significance in the overall assessment process. This matches the 'Impact' stated in the Tier 1 Assessment Criteria table following para 5.3 of SAD Consultation Document, however no explanation is provided on how these impacts are weighted relative to each other. This reduces the ability for sites to be easily compared.
- 3.9 Due to the combination of the colour coding and limited information on weighting, the site assessment process appears to have been based on subjective judgments and weightings of the categories, rather than being a transparent and easy to understand methodology. This ultimately undermines the judgements reached on each site and the robustness of the approach.

4.0 Perton Site Assessments

4.1 In the context of the concerns noted above with respect of the overall methodology used to assess the sites, a detailed review of the Council’s site assessments has been undertaken to consider whether the assessment of the Perton sites and the Council’s evidence has been undertaken reasonably and consistently. This review has highlighted a number of inaccuracies and mistakes which should be rectified in order for the Site Allocations to meet the NPPF soundness tests and the most sustainable options to be allocated.

4.2 It is noted that the published SAD Preferred Options and Discounted Sites Papers do not include plans illustrating all the detailed boundaries for the sites which have been considered. However, for ease of reference the following plan from the Sustainability Appraisal identifies various sites around Perton, excluding the wider site area for Perton Green (site 467). These boundaries correlate with those presented in the SAD Main Sites Consultation (March 2014) and the Additional Sites Consultation (July 2014). As noted previously, the relevant extracts from the previous SAD consultations for site 246a and 467 are included at Appendix 2.

Figure 4.1 Perton Sites



Source: SAD Preferred Options Sustainability Appraisal (Amec Foster Wheeler)

Sequential Test

- 4.3 The need to include the ‘Sequential Test’ criteria in the site selection process is questioned. The South Staffordshire Core Strategy is clear that 90% of housing growth should take place in the main service villages, including Perton. Furthermore, on the basis of Core Policy 6: Housing Delivery, a requirement for 166 houses within Perton was identified. On this basis the Core Strategy has already set the requirement for housing to be allocated to Perton. All the suggested sites around Perton are within the green belt and therefore on the Sequential Test category they all score the same (i.e. Green Belt land adjacent to a village) therefore, the sequential test approach is not helping to differentiate between sites within the site selection process. On this basis it is suggested that it is removed from the Site Assessment criteria.

Green Belt Review

- 4.4 The SAD Site Assessment RAG scores appear to be based on the Green Belt Review undertaken by LUC on behalf of the Council. Appendix 3 provides a detailed review of the LUC assessment, this has identified a number of errors in both how the rankings have been transferred to the Site Assessment matrix and with the Green Belt Review. The following table provides a corrected RAG score for the Site Assessment on the basis of this review.

Table 4.1 Green Belt Review - Summary of Scoring and Alternative Scoring

Perton Site ref	LUC Green Belt Review Parcel	LUC Green Belt Review Ranking	SAD Site Assessment Score	Corrected LUC Green Belt Review Ranking	Corrected SAD Assessment Score
238a	5	C	Yellow	D	Red
239	4	B	Yellow	B	Yellow
241	2	C	Yellow	D	Red
246a/467	6	D	Red	C	Yellow
402	1	D	Yellow	D	Red
407	3	A	Green	A	Green
454	2	D	Yellow	D	Red

- 4.5 With respect to the Perton Green site, our assessment of the Green Belt Review demonstrates there is very little difference between the contribution of the top three sites (407, 239 and 246a/647) to green belt purposes but only two were taken forward to the Tier 2 assessment. Perton Green scored only one point lower than the next ranking site (site 239). Given the subjective nature of the assessment and the marginal difference between the three highest performing sites, it is difficult to justify disregarding the Perton Green site from the next stage of the assessment in a process which should consider all reasonable alternatives balance factors beyond just the Green Belt designation/purposes if it is to accord with national planning policy.

Countryside/Landscape Quality

4.6 It is noted in the SSC ‘Methodology Sites Paper’ that consideration of Countryside/Landscape Quality has been directly informed by the Council’s Landscape Sensitivity Study 2015. However, as with the Green Belt Review noted above, there are a number of inconsistencies both with the Landscape Study itself and the correlation of its conclusions to the SAD Site Assessment matrix. The details of these inaccuracies are set out in further detail in Appendix 4.

4.7 Overall, as result of this review is considered that the landscape sensitivity of the Perton Green site (246a/467) should be revised from high to medium. Alongside the correct transfer of the Report’s findings in respect of the other sites, this leads to the following revised Site Assessment scores:

Table 4.2 Landscape Quality - Summary of Scoring and Alternative Scoring

Perton Site ref	Landscape Sensitivity Study (2015) Parcel Ref	Landscape Sensitivity Study (2015) Rating	SAD Site Assessment Score	Revised Landscape Sensitivity Rating	Revised SAD Assessment score
238a	PN3	High/low	Green	High/low	Yellow
239	PN4	Medium	Green	Medium	Yellow
241	PN1	High	Red	High	Red
246a/467	PN5	High	Red	Medium	Yellow
402	PN3	High	Red	High	Red
407	PN4	High/Medium	Green	High/Medium	Yellow
454	PN1	High	Yellow	High	Red

Access to Amenities

4.8 Table 4.3 summaries the access to amenities scores for Perton. In general, it is not clear from the documents accompanying the Preferred Options consultation how ‘access to amenities’ has been assessed. The accompanying topic paper which seeks to explain some (but not all) of the matrix assessment criteria states that “*an assessment has been made of the relative proximity of the alternative development sites options to the exiting range of services and facilities. This assessment has included an assessment of the existing or potential connectivity between each site and the range of local services and facilities*”. This is not a specific or transparent approach and the actual criteria used, and any weighting which has been applied, should be clearly explained.

Table 4.3 Access to Amenities Score

Perton Site ref	SAD Site Assessment Score
238a	Light Green
239	Light Green
241	Yellow
246a/467	Light Green
402	Red
407	Light Green
454	Yellow

- 4.9 It is noted that in the Methodology Paper reference is given to the Sustainability Appraisal considering accessibility more detail (page 20) and subsequently this does confirm a number of quantitative measures for assessing accessibility in terms of the distance of the site from health facilities, post office, schools and employment. However, it is not clear from the Council’s work if this same distance based criteria has been used for the overall SAD Site Assessment or how potential connectivity has been considered alongside this.
- 4.10 In relation to site 407 the Tier 2 comments for this site state that there are “*potential pedestrian safety concerns due to the lack of footpath along Wrottesley Park Road*”. Therefore it is surprising that the site is still ranked with a light green rating.
- 4.11 Another concern with the consideration of accessibility is why the RAG categorisation explanation refers to how accessible a site is on foot and car to local amenities “*comparative to other sites*”. The RAG scores should be based on the individual merits of each site rather than a comparison with each other.
- 4.12 One significant advantage of the Perton Green site is the inclusion of the existing Perton Farm Shop. This local shop provides an important facility for existing residents throughout the year and is recognised as such within the community. It will also serve any future development on the Perton Green site.

Surface Water Flooding

- 4.13 According to the Methodology Paper and accompanying topic paper, these scores are based on a detailed assessment of all potential development sites undertaken by Staffordshire County Council Flood Risk Team, in terms of considering the principle of development in relation to the potential for flood risk arising as a result of surface water drainage issues. However, details of the County Council’s assessment are not available online with the other consultation documents, therefore it is not possible to understand the extent of the assessment undertaken.
- 4.14 The Environment Agency mapping illustrates that none of the sites around Perton are located in a flood risk zone; therefore the starting point for assessment should be to assume that the flood risk is the same in relation to

each site. The Environment Agency surface water flooding mapping also illustrates that a number of the sites have areas of high, medium and low risk of flooding from surface water. These are typical of drainage details, commonly found in agricultural fields and appear to impact in some way all of the Perton sites (apart from 402). Such drainage issues can be address through further on-site investigation and militated against through appropriate sustainable urban drainage systems (SUDS).

4.15 Mrs Beard has previously commissioned detailed studies and supported discussions with the County Council, Wolverhampton City Council and Severn Trent Water which have sought to identify and address the existing local issues. It is evident from these studies, which have been shared with the Council, that the local surface water flood risk issues are focussed around the culvert and original river course through Perton village and not at The Bradshaws Estate (on Sites 246a/467).

4.16 On this basis it is unclear why site 246a/467 has been ranked lower than comparable sites located close by and as such is rated as having “*significant flood risk concerns*” (yellow). In comparison to Perton Green, sites 329 and 407 are also located off Wrottesley Park Road and comprise green field land with similar topographies to site 246a/467. There is no obvious reason why the site should be ranked differently and this is not explained within any of the supporting text.

4.17 Until further information is provided to justify the differences between the sites it is considered that all sites should be ranked the same as ‘acceptable in principle’ with no significant flood risk concerns (Table 4.4). Especially, on the basis that modest onsite mitigation could manage any localised surface water flood risks. The exception to this is site 402 which is not shown at any risk of surface water flooding according to the E mapping.

Table 4.4 Surface Water Flooding

Perton Site ref	SAD Site Assessment Score	Revised SAD Site Assessment Score
238a		
239		
241		
246a/467		
402		
407		
454		

Highway Accessibility

4.18 It has been confirmed by Staffordshire County Council Highway Authority that only a preliminary ‘high level’ review of all of the Perton sites has been undertaken to identify the potential constraints that may limit their suitability to accommodate further development in the future. It is understood that the

Highway Authority has not undertaken a detailed review of the individual sites or the associated transport implications as part of the SAD preparation process. The proposals for highway improvements at Perton Green (including the A41 junction works) have however been separately discussed and agreed with SCC Highways. This detailed work and agreement should be recognised in the SAD preparation process.

- 4.19 The Site Assessment places a significant amount of weight on the Highway Authority's comments, despite it comprising such a limited assessment of the site. In order to address this shortfall a review of the Perton sites has been undertaken by the Hurlstone Partnership Limited (Appendix 5) and the results summarised below. In particular, these comments focus on sites 239 and 407, in comparison to the Perton Green site, as all three sites lie to the west of Wrottesley Park Road. Other than the minor variations in terms of the traffic routes into/out of Perton, the same level of development on either would result in the same volume of traffic being generated and travelling along the same route to/from the A41.

Site 246a/467 Perton Green

- 4.20 Detailed assessments for the Perton Green site have already been undertaken in consultation with the Highways Authority, including a detailed assessment of the A41/Wrottesley Park Road signal controlled junction, which is currently severely constrained. The Wrottesley Park Road corridor is congested due to the capacity constraints at this junction. To address this our client is proposing improvements to the junction, using land within their ownership, to ensure that the proposal would not exacerbate existing queues and delays and to seek to reduce existing queue lengths at this junction.
- 4.21 The assessments undertaken by Hurlstone Partnership Limited indicate the proposed improvements would provide an overall level of betterment when compared with the current situation. To date, two improvement options for the A41 junction using land under the control of our client have been discussed with the Highways Authority and it has been confirmed that the proposed improvements are satisfactory to mitigate the impact of the development, subject to detailed design.
- 4.22 The Perton Green site is the only site which can deliver this significant highway improvement. The works would be funded by the applicant/landowner in connection with the development of the site through agreements under Section 106/278.

Site 239

- 4.23 A Technical Note on Transport Issues associated with site 239 (Land at Wrottesley Park Road (South)) prepared by TPA, was submitted with the previous SAD Main Sites consultation. Section 5 of the Technical Note describes the proposed access to the roundabout and a potential priority junction to the north to serve the further development. It confirms the proposal to increase the diameter of the existing roundabout to accommodate the

additional arm to provide access to the site. In terms of the northern access, the potential for a ghost island is considered, together with the requirement for associated carriageway widening and loss of hedgerow to achieve the required visibility splays. Another option is also identified which includes the realignment of Wrottesley Park Road.

- 4.24 In comparison, the Perton Green site 246a/467 would utilise an additional arm from the existing roundabout. The initial design indicates it would not be necessary to enlarge the ICD of the roundabout to accommodate the development. Further priority junctions to Wrottesley Park Road have also been identified, in the form of priority junctions with ghost-island right turning lanes. The comparable priority junctions between sites 246a/467 and 239 & 407 would be very similar in terms of their layout.

Site 407

- 4.25 In terms of site 407, it is already noted above that there is no apparent footway cycleway link along Wrottesley Park Road. However, this does not appear to have detracted from its ranking within the table both overall and when assessed in terms of transport matters. In comparison the Perton Green site benefits from a footway cycleway along the length of the site frontage on the east side of Wrottesley Park Road to which crossing points are proposed.

Sites 238a & 402

- 4.26 Site 238a is ranked in yellow, which is the same ranking given to site 246a/467. However, an access to site 238a via Edge Hill Drive would result in the majority of traffic travelling through the existing streets of Perton in order to access the wider highway network. As a result, its impact is likely to be greater than sites 239, 407 and 246a/467, which would benefit from direct access to Wrottesley Park Road and therefore avoid routing through traffic along the existing residential streets within Perton. The same conclusion is reached in respect of site 402 which can only be accessed with site 238a.

Highway Access Conclusions

- 4.27 In the context above it is therefore difficult to understand the Highway Authority's conclusion that for site 246a/467 "*...significant highways improvements likely to be required.*" Especially in comparison to sites 407 and 239 which both require access alterations to Wrottesley Park Road, which may be more substantial than those required for site 246a/467. This error has been recognised by the Highways Authority in further discussions with them regarding the site appraisal process. On this basis a revised ranking for the sites is suggested as follows:

Table 4.5 Highway Accessibility

Perton Site ref	SAD Site Assessment Score	Corrected SAD Site Assessment Score
238a	Yellow	Yellow
239	Green	Green
241	Red	Red
246a/467	Yellow	Green
402	Orange	Orange
407	Green	Green
454	Red	Red

Impact on Land Use and Loss of Facilities

4.28 Under this criterion all the sites around Perton have been scored as yellow. The Methodology Paper also notes that the “majority of sites being considered in the SAD are Greenfield sites (such as agricultural/grassland) and therefore are categorised as yellow, as they may see the loss of agricultural land/informal recreational space etc.” (pg 22). On this basis it is suggested that the key considerations for this criterion in relation to the majority of sites should be the quality of the agricultural land which may be lost as result of the development and secondly whether there is any use the land for recreational purposes which may be lost as result of its development. These considerations will also allow for further differentiation between green belt sites which otherwise score the same.

4.29 In terms of the agricultural land classification (ALC) this is a matter which appears to have been considered by the Council in relation to the ‘Natural Environment’ criterion below. However it would more appropriately sit within this category. The ALC for the various Perton sites are not clear from the background information provided in the topics paper. However, on the basis of the comments on the matrix it is noted that the Perton Green site (246a/467) is believed to be partly Grade 3 agricultural land, whereas sites 239 and 238a, include parts which are believed to be the more valuable Grade 2 agricultural land. In this context the following scoring for the Perton sites is considered appropriate:

Table 4.6 Revised Scoring for Impact on Land Use and Loss of Facilities

Perton Site ref	SAD Site Assessment Score	Revised SAD Site Assessment Score
238a		
239		
241		
246a/467		
402		
407		
454		

Impact on the Natural Environment

- 4.30 In terms of impact on the Natural Environment, a review of the Topic Paper and Site Assessment has not identified any particular issues on how the assessment was undertaken and the key considerations, apart from the relocation of the agricultural land classification consideration to the category above. Therefore, we have no further comments on the Site Assessment scores referenced below in table 5.8.

Table 4.7 Natural Environment

Perton Site ref	SAD Site Assessment Score
238a	
239	
241	
246a/467	
402	
407	
454	

Impact on Environmental Quality

- 4.31 In terms of Environmental Quality, all the Perton sites score 'light green' meaning that development is acceptable in principle with no environmental quality impacts. However, in reviewing the detailed comments on Environmental Quality in relation to other sites in the District is noted that a higher 'dark green' rating has been provided where the past or existing use of the site may have resulted in contaminated land and the development of the site may result in a positive benefit. However, it is considered the assessment should go a step further and consider the ways sites may deliver other positive environmental quality impacts.
- 4.32 In relation to Perton Green, it is noted above that it is the only site that can deliver the junction improvements to the A41/Wrottesley Park Road. These junction works will result in major improvements to traffic congestion around

Perton and as such improve air quality. On this basis the site offers a positive environmental quality benefit.

Table 4.8 Environmental Quality

Perton Site ref	SAD Site Assessment Score
238a	
239	
241	
246a/467	
402	
407	
454	

Impact on Historic Environment/Heritage

- 4.33 In relation to the last site assessment category, the detailed comments for each site demonstrate that site 239, 246a/467 and 407 are ranked lower than the other sites with a 'medium' impact on the historic environment due to the presence of a heritage asset based on a 'potential' HER (Historic Environment Record) on the site (see table 4.9).
- 4.34 From the historic mapping included in the topic paper it is difficult to accurately identify what the historic designations are which relate to these HER records and their potential significance. However, in relation to site 246a/467 it is assumed to be the potential for the Second World War Dutch army camp which existed on part of the site. This suggests there is a 'potential' below ground consideration which will need to be investigated in the future. However, this consideration should not be treated in the same way as an above ground heritage asset, where the impact of future development on its setting will need to be carefully assessed.
- 4.35 Downgrading the site on the basis of a potential HER record does not recognise that such a HER designation may be easily overcome by further investigation works and is not barrier to the development of the site.

Table 4.9 Impact on Historic Environment/Heritage

Perton Site ref	SAD Site Assessment Score	Revised SAD Site Assessment Score
238a		
239		
241		
246a/467		
402		
407		
454		

5.0

Revised Assessment of Perton Green

Tier 1 Criteria Summary

5.1

For the reasons explained in Section 4.0 it is considered that Perton Green site (246a/467) should score as follows against the Council's Site Assessment matrix.

Table 5.1 Summary of Corrected/Revised Tier 1 scoring for Perton Green site

Assessment Criteria	Site 246a/467 Existing Score	Site 246a/467 (combined) Revised Score	Comment / Summary of change
Sequential Test			Suggest this category is removed
Impact on the Green Belt			Correcting the ranking errors in the Green Belt Review significantly alters the scoring of the site
Countryside – Landscape Quality			Recognition of built development already existing on the site
Access to Amenities			No change
Surface Water Flooding			No flood risk issues identified to justify existing lower ranking
Highway Accessibility			Highway alterations will result in significant wider benefits, therefore higher ranking justified.
Impact on Land Use and Loss of Facilities			Revised category to consider Agricultural Land Classification
Natural Environment			No change
Impact on Environmental Quality			Other environmental benefits to be delivered from the site (A41 junction improvements) should be a consideration.
Impact on Historic Environment /Heritage			HER record is not a significant barrier to potential for development on the site therefore the site should not be ranked lower on this basis.

Comprehensive Perton Sites Assessment

- 5.2 In order to ensure a comprehensive assessment of the Perton Green site relative to the others in Perton, the revised scoring identified in Section 4.0 has been compiled in a composite table (Appendix 6). To address some of the earlier comments in Section 3.0 regarding the use of the RAG scoring a numerical value has also been given to each colour in order to clearly rank the sites. The following values have been used:

Table 5.2 Colour Values

RAG Colour	Score
Red	5
Orange	4
Yellow	3
Light Green	2
Dark Green	1

- 5.3 As a second stage, the Council's suggested weighing has then been applied to the scores for each criterion. Specifically, criteria noted by SSC as being of 'high' impact were doubled and those which were 'very high' were trebled. As result of this process the following ranking of the sites is identified:

Table 5.3 Overall Ranking of Sites Following Comprehensive Assessment of Sites

Perton Site Reference	Total Score	Overall Ranking
238a	49	4
239	39	3
241	56	6
246a/467	38	2
402	55	5
407	37	1
454	56	6

- 5.4 On this basis it is clear that the site performs strongly against the others in Perton across the Tier 1 criteria being considered by the Council. The site should have therefore been considered at both tiers of assessment before conclusions drawn about its suitability for development. The site has been dismissed at too early a stage, when, as demonstrated above, it forms a 'reasonable alternative' for development.
- 5.5 Without consideration of the site as part of the Tier 2 assessment the current Preferred Options SAD is not legally compliant and therefore fails to meet the NPPF soundness tests. Further consideration of the Perton Green site against the Tier 2 criteria is therefore necessary and set out in further detail below.

Assessment of Perton Green (246a/467) against Tier 2 Criteria

Community Views

- 5.6 The Core Strategy 2012 states that “*engagement with local communities and the effectiveness of the consultation processes will be an important part of the Site Allocations DPD*” (our emphasis). The Perton Green site has a significant level of public support which is identified in the Community Council of Staffordshire, Consultation Report. A detailed review of the Report (Appendix 7) has identified that a number of the conclusions it reaches with regard to the Perton Green site are potentially misleading, however, overall it still demonstrates significant public support for the development of this site in preference to others around Perton.
- 5.7 Furthermore, it is noted that the Perton Parish Council also identify site 246a as their first choice for green belt release (letter dated 16 May 2014; Appendix 8). They highlight the many unique benefits which the site can provide including improvements to local traffic congestion and access arrangements, good access to local schools, shops and facilities. Our client’s position that the site can best meet the needs of local people, is therefore supported by the Parish Council.

Community Infrastructure Opportunities

- 5.8 The Perton Green site provides significant opportunities for community infrastructure provision. Mrs Beard’s family and The Bradshaws Estate has a long connection with Perton and part of the aspiration for developing the site is to ensure the Bradshaw legacy is maintained through providing improved community facilities for the village. The Perton Farm Shop is well used by local residents and is a hub of activity throughout the year. The latest masterplan prepared for the site includes details of a potential further community hub to serve both the development itself and the wider area. In connection with the community hub at the centre of the site, there is also potential for wider community facilities, including sports pitches and allotments on the northern side of the site (i.e. within the wider site 467 area), as discussed in further detail below.

Economic Opportunities

- 5.9 The economic benefits that new housing on the Perton Green site can deliver should not be underestimated. This includes the provision of temporary construction jobs over the build period, plus further indirect and induced jobs through the supply chain and in local shops and services. It would result in a significant increase in local authority revenues from increased Council tax receipts and the New Homes Bonus. In addition, the site has the potential to provide access to existing employment opportunities in the local area.

- 5.10 Our client is committed to bringing forward the development at as earlier stage as possible, therefore its early delivery will help ensure these benefits are delivered promptly within the plan period.

Opportunities for Open Space, Green Infrastructure and Recreation Facilities

- 5.11 As identified on the latest masterplan for the site (Appendix 1), there is significant potential for the creation of new open spaces, green infrastructure and recreational facilities on the site, given the extensive land holdings in our client's ownership. From discussions with the Parish Council the need for new allotments for the Village has been identified as well as potential for recreational playing fields. Furthermore, the site has an additional advantage of being able to provide improved pedestrian connections with the wider footpath and bridleway network in the local area.

Use of Natural Boundaries

- 5.12 The Methodology Paper (Appendix D) notes that proposed schemes which *"use natural boundaries and protect residential amenity will be judged to have a lower impact when considered against this criterion"*. The proposed masterplan for Perton Green (Appendix 1) and accompanying photomontages included in the Green Belt review (Appendix 3) demonstrate that the existing woodland blocks that surround the site help to visually screen the site and residential amenity will continue to be protected as a result of the development.
- 5.13 There is potential for additional woodland planting along the existing hedgerow field boundaries to further contain the site. As a result the site would remain largely hidden and within the wider landscape and the development could be significantly contained and screened by woodland. The land for additional woodland planting lies within the ownership of Mrs Beard and could be 'advanced' planted ahead of future development to allow new landscaping areas to be established in advance of development.

Enhancing Community Safety

- 5.14 The initial master plan for the site demonstrates how the proposed Perton Green development would address the principles of secure design by providing a layout with good levels of natural surveillance, including active street frontages. The access route into the site and access improvement to the A41 Junction will also help reduce congestion and any associated community safety issues.

Summary of Perton Green Tier 2 Assessment

- 5.15 As demonstrated by the analysis above, the Perton Green site would score very strongly against the Tier 2 criteria, especially in relation to the strong local support for the sites as the preferred site allocation for Perton. In addition, the initial urban design analysis demonstrates that the site's existing vegetation

screening, especially when combined with advance planting, can help to create a strong boundary around the site which will help screen it from long distance views. Lastly, there also is significant potential for open space and recreational facilities which will benefit residents within the development itself as well those living in the wider area.

- 5.16 Overall, both tiers of assessment demonstrate that there are no significant barriers to development. On the basis of these assessments it is considered that the site should be identified as the 'preferred option' within the SAD. It has been demonstrated that it represents a sustainable location for new development, when considered against the Council's criteria and judged relatively to other sites around the Village and is strongly supported by local residents.
- 5.17 Further consideration of these matters is required by South Staffordshire Council prior to the submission of the Site Allocations Document. Otherwise, the SAD will fail to meet the NPPF soundness tests (para 182) on the basis that it is not justified i.e. representing the "*most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence*" and also fails to be consistent with national policy by considering the "*need to promote sustainable patterns of development*" (NPPF, para 85).

6.0

Conclusion

6.1

Our review has identified a number of issues with the SAD Preferred Options, both in terms of the overall methodology used by the Council and in relation to specific assessment of the sites around Perton, including concerns relating to the evidence base documents and the weight attached to other material considerations. In particular, corrections to the green belt review and landscape sensitivity report (as well as other corrections to the scoring) arising from the errors identified have confirmed that the Perton Green site performs strongly in comparison with the other sites in Perton. Perton Green should be ranked second out of the Perton sites at Tier 1 and should be considered as part of the Tier 2 assessment.

6.2

In undertaking this next stage, and assessing the site against the Tier 2 assessment, it is demonstrated that the site also performs strongly, especially in relation to the strong local support for the development and the potential for recreational open space and community facilities to be delivered as part of the proposals. When all these matters are taken into consideration and the potential to deliver sustainable pattern of development is fully considered, it is clear the Perton Green site should be taken forward as the 'preferred option' within the Site Allocations Document.

6.3

The corrected assessment of the Perton Green site, across both Tiers of the assessment, recognise it as an appropriate location for promoting sustainable patterns of development which the NPPF (para 84) requires local planning authorities to consider when reviewing Green Belt boundaries. In particular, the Perton Green site provides the following benefits:

- a Approximately 160 new homes for local people, including retirement homes and affordable housing. In addition, space for safeguarded land to provide housing in the long term future if needed.
- b Community hub and village green at the heart of the development,.
- c Highway improvements to reduce congestion at the A41 junction resulting in wider environmental quality improvements.
- d Playing fields and allotments for residents to use
- e On-site access to amenities, including the existing Perton Farm Shop, a valued local facility.
- f Improved footpath links with Perton and the wider countryside, including the Staffordshire Way.
- g New planting and existing hedgerows and woodland to contain and screen the development from the surrounding countryside.
- h A high quality residential environment set in high quality landscaping, ensuring residential amenity is provided and maintained.
- i Strong local support for the development, recognising the site is best placed to meet local people's needs.

- 6.4 Many of these benefits are demonstrated on the detailed Masterplan for the site which is enclosed at Appendix 1.
- 6.5 Overall, we conclude that the corrections to the site assessments set out in these representations must be taken in to consideration by the Council prior to the submission of the SAD for the document to be found sound.
- 6.6 The effect of these corrections leads to the conclusion that the Perton Green Site (246a/467) should be identified as the preferred option for sustainable development to meet the identified local housing needs in Perton on the site supported by Perton Parish Council and the local community.

Appendix 1 Perton Green Masterplan



Nathaniel Lichfield
& Partners
Planning, Design, Economics

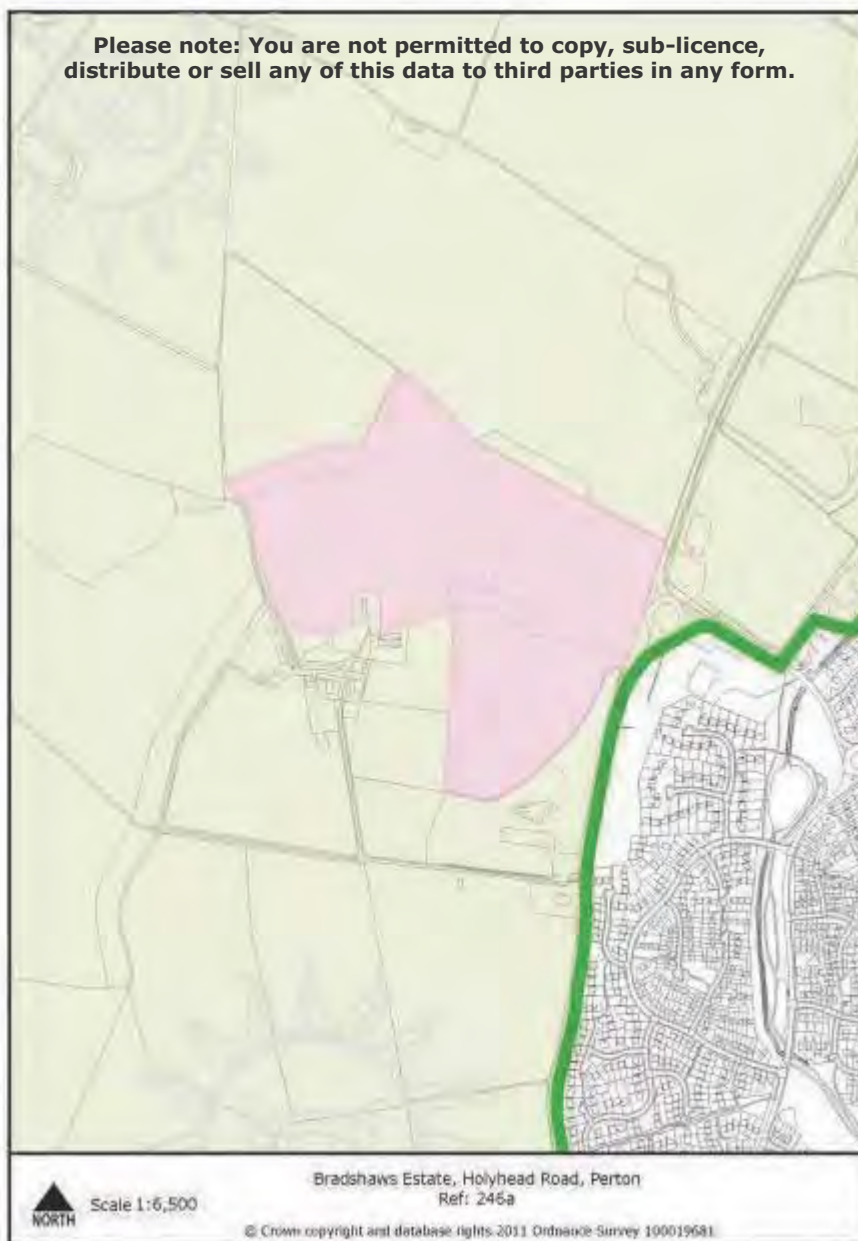
Project	Perton Green
Title	Indicative Masterplan

Client	Mrs S R Beard
Date	February 2016
Scale	NTS
Drawn by	CP
Dwg No	IL41194-020-Rev B
Scale	1:1000



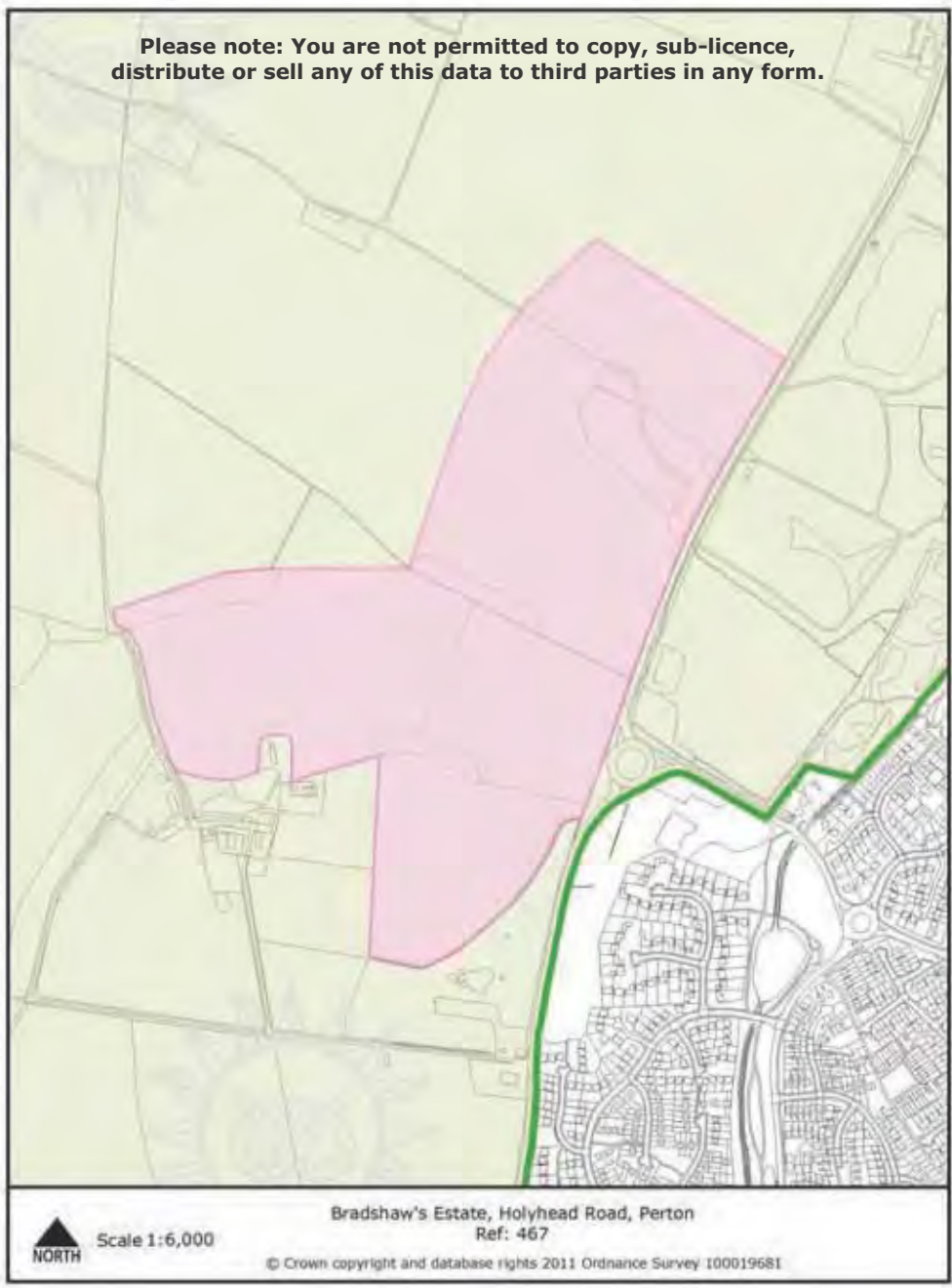
Appendix 2 246a/467 Site Boundary Extracts

Site Reference:	246a	Village:	Perton
Locality:	4	Cannock Chase SAC Zone of Influence:	No
Address:	Bradshaw's Estate, Holyhead Road	Sequential Approach Category:	4
Area (Hectares):	17.00	Grid Reference:	385712,300882
Proposed use:	Housing/Mixed use	Capacity average 20/25 per ha:	340-425 dwellings



Relevant Strategic Objective(s)	SO1, SO2, SO3, SO6, SO7, SO8, SO9, SO10, SO11, SO14
Constraints	Outside the Development Boundary in the Green Belt.
Current use(s)	Greenfield
Reason(s) for consideration	Part of the site could potentially provide all of the Core Strategy housing allocation for Perton. Potential for a sustainable mixed use development providing open space.
Potential planning requirements of this site	To deliver community benefit, potentially including: <ul style="list-style-type: none"> • affordable housing and specialist housing for the elderly • an appropriate housing mix • sustainable mixed use development • good sustainable design principles, SUDs and open space • to be accessible by various modes
Background	The Bradshaws estate is a large site to the north east of Perton. The site is approximately 1.2km away from Perton centre. The site is considered 'suitable' as it adjoins the Perton Development Boundary, however it is constrained by the degree to which it adjoins the boundary and this acts as a constraint to sustainable patterns of development. If the site was to come forward it would result in the irregular village boundary. A proportion of the site adjacent the Perton Development Boundary could be considered for housing.
Relevant Planning History	N/A
Current Land Designation	Green Belt

Site Reference:	467	Village:	Perton
Locality:	4	Cannock Chase SAC Zone of Influence:	No
Address:	Bradshaws Estate, Holyhead Road (extension to existing site 246a)	Sequential Approach Category:	4
Area (Hectares):	30.90	Grid Reference:	385644, 300749
Proposed use:	Housing/Mixed use	Capacity average 20/25 per ha:	618-772 dwellings
New site suggestion?	No	Amendment to existing site suggestion?	Yes



Relevant Strategic Objective(s)	SO1, SO2, SO3, SO6, SO7, SO8, SO9, SO10, SO11, SO12, SO13, SO14
Constraints	Outside the Development Boundary in the Green Belt. Part of the northern end of the site is part of a Historic Parkland, forming a public open space.
Current use(s)	Greenfield, although a small element of the site contains a farm shop.
Reason(s) for consideration	Could provide all of the Core Strategy housing allocation for Perton. Potential for a sustainable mixed use development providing open space.
Potential planning requirements of this site	To deliver community benefit, potentially including: <ul style="list-style-type: none"> • affordable housing and specialist housing for the elderly • an appropriate housing mix • sustainable mixed use development • good sustainable design principles, SUDs and open space • to be accessible by various modes
Background	The Bradshaws estate is a large site to the north east of Perton. The site is approximately 1.3km from the village centre and 1.8km from Perton Middle School. The southern section of this site was considered in the previous 'Issues and Options' consultation (site reference 246a). This consultation relates to the northern extension of that site.
Relevant Planning History	2006. Certificate of Lawfulness for use of farm shop for general retail sales within class A1 - 06/00396/LUE: APPROVED
Current Land Designation	Green Belt

Appendix 3 Green Belt Review

The LUC Green Belt Review Method Statement includes a plan (figure A.1) of the Parcels surrounding Perton which have been addressed as part of the Green Belt Review. The parcels are ranked on the plan by their relative suitability for release from the Green Belt. As noted on page 10 of the report, parcels which perform the purposes of the Green Belt less well are ranked (A), with the remaining parcels ranked in descending order. The Perton plan illustrates that the parcels have been ranked in the following order:

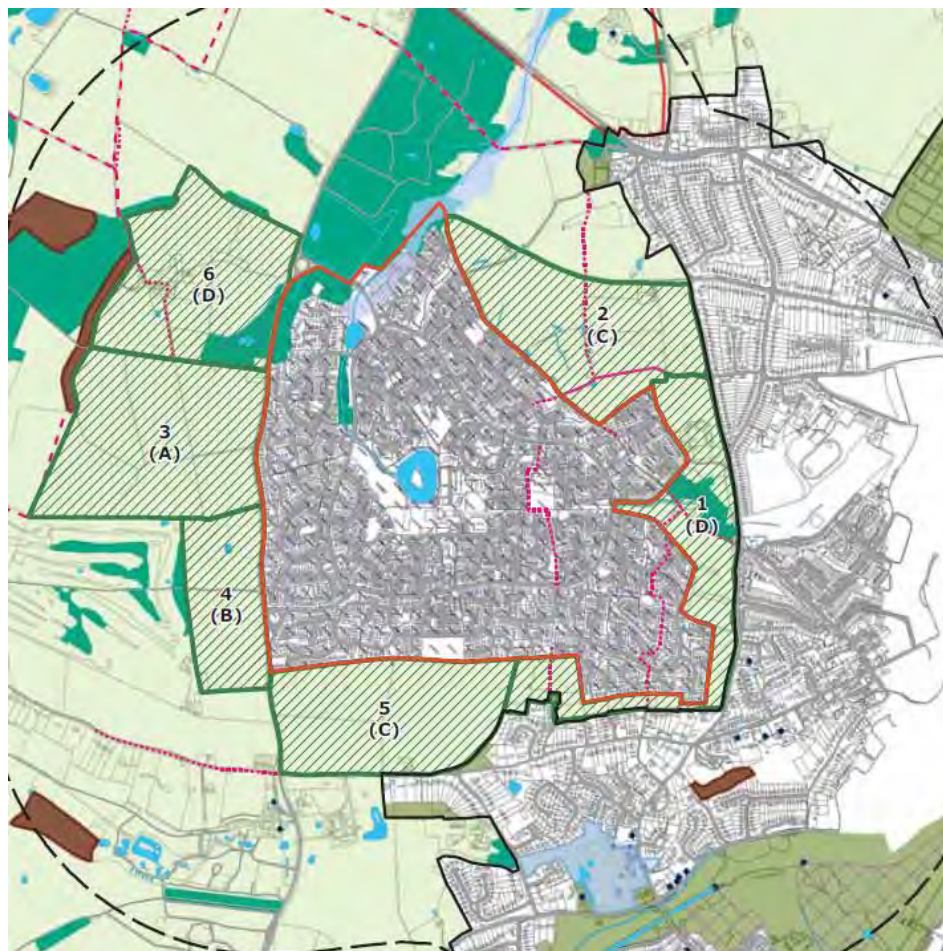
A - site 3 (SAD 407)

B - site 4 (SAD 239)

C - sites 2 (SAD 241/454) & 5 (SAD 238a/402)

D - sites 1&6 (SAD 246a)

Figure A.1 Green Belt Review: Perton Sites



Source: LUC

The following table compares the LUC Green Belt Review ranking and the corresponding SAD Site Assessment RAG colour score for each of the sites

(based upon which of the LUC parcel boundaries the sites fall into). From this it is clear that the LUC scoring has not accurately been transferred to the SAD Assessment and no explanation for the variation is provided. Specifically, on the basis of the LUC ranking parcels 1 & 6 were scored the lowest (D) rating. However, on the SSC RAG score the sites within these parcels have scored both Amber and Red. There is no justification provided as to why this is the case.

Table A.1 LUC Green Belt Review vs SAD Site Assessment

Perton Site ref	LUC Green Belt Review Parcel	LUC Green Belt Review Ranking	SAD Site Assessment RAG Colour Score
238a	5	C	Amber
239	4	B	Yellow
241	2	C	Amber
246a/467	6	D	Red
402	1	D	Amber
407	3	A	Green
454	2	D	Amber

A detailed review of LUC Green Belt Review suggests there are some significant inconsistencies with the LUC ranking, which have a potentially significant impact on the SAD Site Assessment.

Ranking Inconsistencies

As identified above the LUC Green Belt review shows that the parcels have been ranked in the following order:

- A - site 3 (SAD 407)
- B - site 4 (SAD 239)
- C - sites 2 (SAD 241/454) & 5 (SAD 238a/402)
- D - sites 1&6 (SAD 246a)

However, the detailed scoring of the Perton sites, obtained from the Council alongside the main report, illustrate a different result. The following table summarises the detailed scoring provided for each site against the five Green Belt purposes.

Table A.2 Green Belt Review Score for Perton Sites

Parcel	1) To check the unrestricted sprawl of large built up areas	2) To prevent neighbouring towns merging into one another	3) To assist in safeguarding the countryside from encroachment	4) Preserve the setting and special character of historic towns	5) To assist in urban regeneration	Total Score (+)
1	+++ , +	+++ , ++ , +++	+++ , ++ , ++	+	+	21
2	+++ , +	+++ , ++ , +++	+++ , +++ , ++	+	+	22
3	+, +	+, +, +	+++ , ++ , ++	+	+	13
4	+, +	+, +, ++	+++ , ++ , ++	+	+	14
5	+++ , +	+++ , ++ , +++	+++ , +++ , ++	+	+	22
6	+, +	+, +, ++	+++ , ++ , ++	+	+	15

Totalling the scores from the table above provides an accurate and transparent way of easily comparing the sites. On the basis of these total scores the ranking for sites in Perton should be:

A – site 3 (SAD 407)

B – site 4 (SAD 239)

C - site 6 (SAD 246a)

D - sites 1, 2 (SAD 241/454) & 5 (SAD 238a/402)

In terms of where the sites have scored ‘+++’ which suggest they are “*deemed to make a considerable contribution to the green belt*” (see para 3.18), alongside Parcels 3 and 4, the Perton Green site (Parcel 6) is only considered to meet this threshold in relation to one of the five criteria. Furthermore, this is the category where all the sites score the same. In contrast, on the basis of the methodology which LUC have used to rank the sites, there is no justification for Parcel 6 to rank the lowest on the overall plan.

The summary text at para. 4.32 of the report also suggests that incorrect ranking has been applied to the parcels. This states that “*Parcels 1 and 2 to the east and the eastern half of parcel 5 to the south were considered to be the parcels best perform the purposes of Green Belt. All three parcels are open and border Wolverhampton, playing an important role in separating the two settlements*”. On the basis that sites 1, 2, and 5 are considered by LUC to best perform the purposes of the Green Belt they should not be considered for release ahead of site 6 (246a).

Contribution of Parcel 6 (Site 246a)

The summary of the contribution which Parcel 6 makes to the Green Belt purposes is stated at para. 4.33 of the report:

“Parcel 6 to the north west was deemed to make a considerable contribution to the purposes of the Green Belt due to the presence of woodland along the

settlement edge within the parcel having an isolating effect on the countryside within it, which contributes to its openness”

This statement contradicts LUC’s detailed scoring of the site with respect to the assessment of boundaries and features which help to contain development, where they acknowledge that *“the woodland to the west and east, as well as partially to the south and north enclose the parcel...”* This is not consistent with the suggestion that the woodland along the settlement edge contributes to the ‘openness’ of the parcel. In the view of our client, and many local residents, the woodland belt around site is a major benefit as it helps contain the development and reduce its visual impact on the local area. It is typical of the character of other residential areas in Perton which are also bounded by woodland, such as the residential areas to the east and south east of the development.

Overall, the site ranking error identified above and the contradictory nature of the assessments made in relation to Parcel 6, suggest that the Green Belt Review cannot be relied upon as proportionate evidence to inform the preparation of the Site Allocations Document.

Defensible Boundary

The enclosed plans and accompanying photomontages have been prepared to demonstrate the extent of the existing natural boundaries around the site and how further planting along the hedgerows to the north would enhance this and contain the development in the long term. The NPPF advises, that in defining Green Belt boundaries local planning authorities, amongst other things, *“should define boundaries clearly, using physical features that readily recognisable and likely to be permanent”*. Furthermore, the review of the LUC Green Belt Review, discussed above identified that the ability of a site to provide *“existing or manmade features/boundaries to prevent encroachment of the countryside”* is a key area of distinction between the sites around Perton, especially in relation to parcels 3, 4 and 6 (the sites ranked the lowest on the basis of the ‘total’ scoring method).

Plan no. IL41194-0020 illustrates ‘Parcel 6’ of the Green Belt Review, on an aerial photographic base. The plan identifies a number of viewpoints (1-9) towards the Perton Green site and the principal areas of woodland planting (A-J). Pages 1-4 of the photographic montages (ref: ID41194-003) taken from the viewpoints identified on Plan IL41194-0020, highlight the woodland blocks and the approximate extent of Site 467. The plan and supporting pages illustrate the ‘woodland belt’ that visually contain the site.

Plan IL41194-0021 illustrates proposed areas of development and open space within the Perton Green site and the potential for additional woodland planting along an existing hedgerow field boundary between woodland blocks B and C that would help further contain the site and the adjoining Safeguarded Land. The area of additional woodland planting is illustrated on the photographic montages with new planting (ref: ID41194-004). These demonstrate that the site would remain largely hidden and that within the wider landscape, the

development could be significantly contained, and screened by woodland. The land for additional woodland planting lies within the ownership of Mrs Sally Beard and could be 'advanced' planted ahead of future development.

Alternative Green Belt Scoring

On the basis of our revised assessment above the following table provides an alternative RAG score for the Site Assessment on the basis of the corrected assessment.

Table A.3 Green Belt Review - Summary of Scoring and Alternative Scoring

Perton Site ref (SAD)	LUC Green Belt Review Parcel	LUC Green Belt Review Ranking	SAD Site Assessment Colour Score	Corrected LUC Green Belt Review Ranking	Corrected Suggested SAD Assessment Colour Score
238a	5	C	Orange	D	Red
239	4	B	Yellow	B	Yellow
241	2	C	Orange	D	Red
246a/467	6	D	Red	C	Orange
402	1	D	Orange	D	Red
407	3	A	Green	A	Green
454	2	D	Orange	D	Red

With respect to the Perton Green site, our assessment of the Green Belt Review demonstrates there is very little difference between the contribution of Parcel 6 to green belt purposes to that of Parcels 3 and 4 which were taken forward to Tier 2 assessment. On the relative scoring the site was only one point lower than the next ranking site (site 239). Given the subjective nature of the assessment and the marginal difference between the three highest performing sites, it is difficult to justify disregarding the Perton Green site from the next stage of the assessment, in a process which should consider all reasonable alternatives and which must consider and balance factors beyond the Green Belt designation/purposes.

KEY

- Area 6 boundary (SS Green Belt Review)
- Viewpoint location
- Woodland blocks



Nathaniel Lichfield & Partners
Planning, Design, Economics,

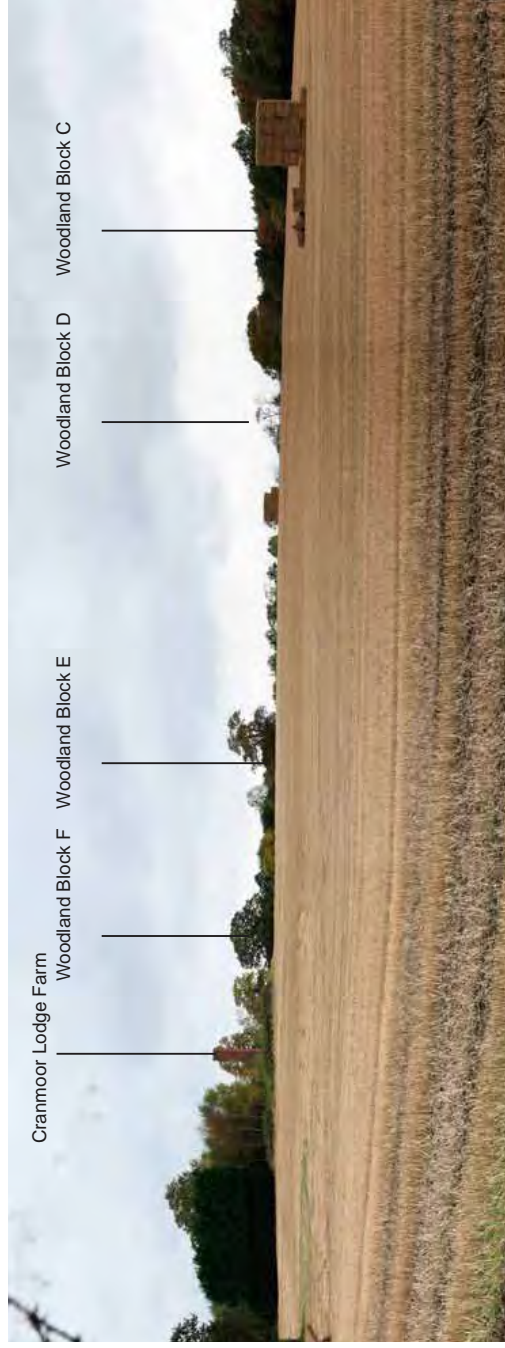
Project	Perton, Staffordshire
Title	Viewpoint Location Plan (Aerial base) South Staffordshire Green Belt Review Area 6
Client	Mrs S. Beard
Date	June 2015
Scale	N/S
Drawn by	CPU
Dwg. No	IL41194-0020



MAA41194
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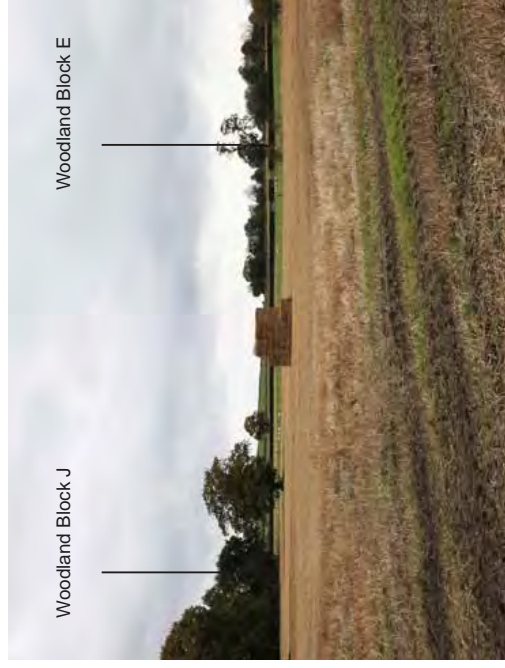


Viewpoint 1. From within proposed development area, looking south east from the western boundary of the site towards Wrottesley Park Road and Perton.



Viewpoint 2. From within proposed development area, looking south West from the western boundary of the site.

Refer to drawing IL41194-0020



Viewpoint 3. From within proposed development area, looking south west to the Staffordshire Way from within the southern field within the site.

Wrottesley Park Road



Viewpoint 4. From within proposed development area, looking south west from Bradshaw's Farm Shop car park.

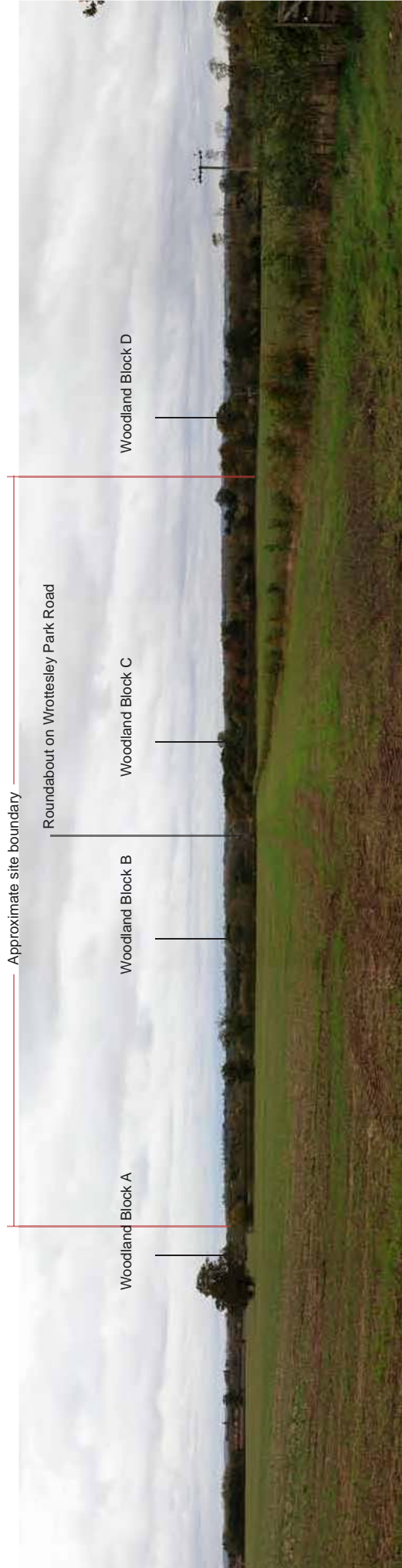


Viewpoint 5. Looking north east towards the site from the Staffordshire Way south of Cranmoor Lodge.

Refer to drawing IL41194-0020

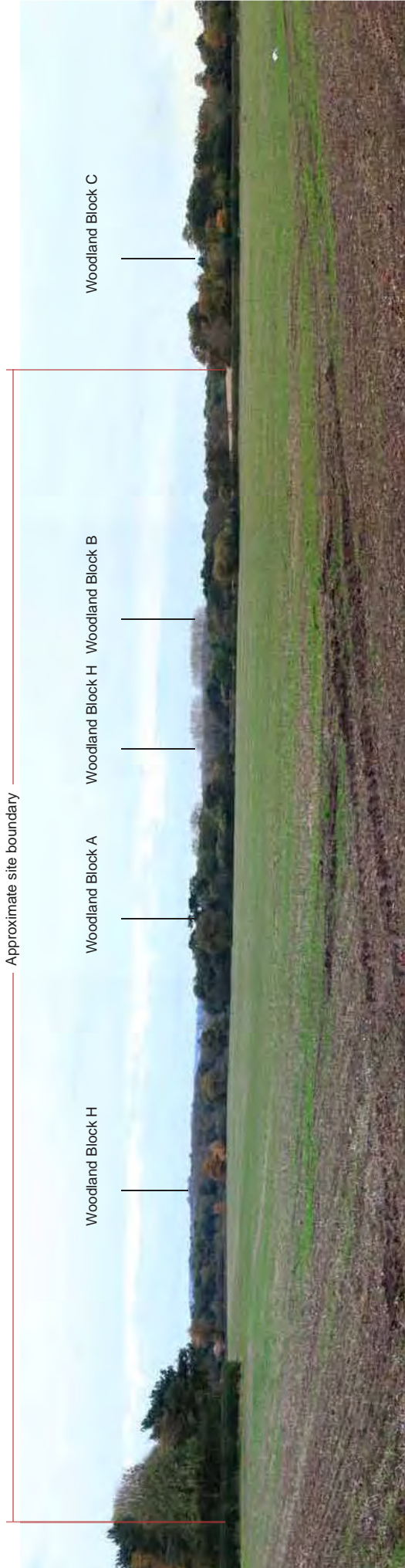


Viewpoint 6. Looking east towards the site from the Staffordshire Way and footpath north west to the Bradshaw's.



Viewpoint 7. Looking east towards the site. Traffic lights within Periton are just visible in the centre of the image.

Refer to drawing IL41194-0020









Viewpoint 8. Looking south east towards the site from the footpath connecting Wrottesley Park Road to the Staffordshire Way.



Viewpoint 9. Looking south east towards the site from public footpath south east of Wrottesley Hall.

Refer to drawing IL41194-0020

KEY

-  Area 6 boundary (SS Green Belt Review)
-  Viewpoint location
-  Indicative built development areas
-  Indicative areas of open space
-  Woodland blocks
-  Proposed woodland block between B & C



Nathaniel Lichfield & Partners
 Planning, Design, Economics.

Project	Perton, Staffordshire
Title	Indicative Development/Proposed Parkland Woodland Planting - Viewpoint Location Plan South Staffordshire Green Belt Review Area 6
Client	Mrs S. Beard
Date	June 2015
Scale	Nts
Drawn by	CPU
Dwg. No	IL41194-0021





Viewpoint 4. Looking south west from Bradshaw's Farm Shop car park.

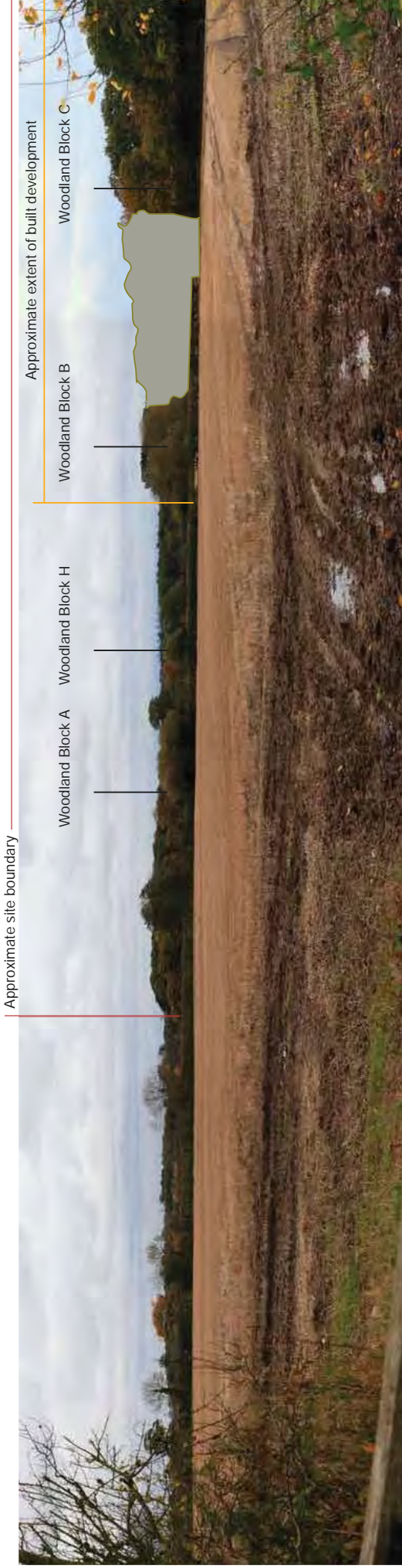


Viewpoint 5. Looking north east towards the site from the Staffordshire Way south of Cranmoor Lodge.

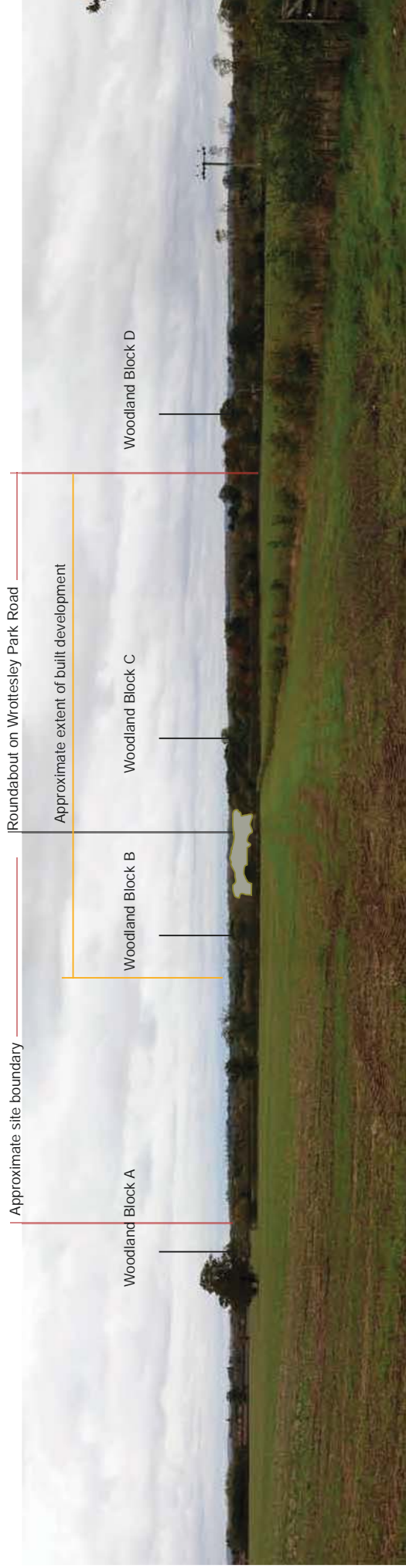
Refer to drawing IL41194-0021

KEY

Indicative location of proposed woodland planting between woodland blocks B and C



Viewpoint 6. Looking east towards the site from the Staffordshire Way and footpath north west to the Bradshaw's.

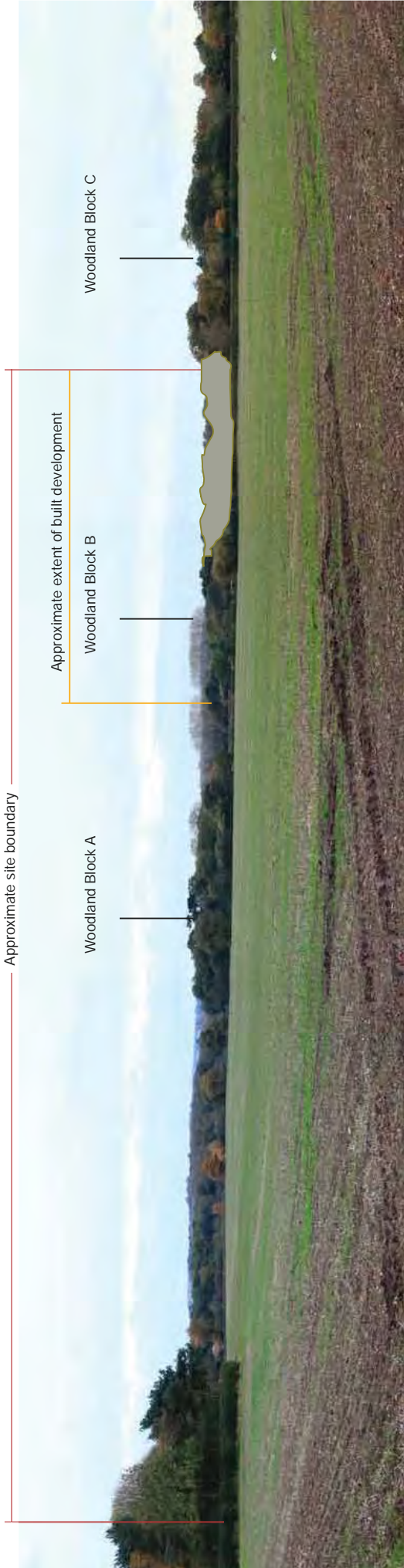


Viewpoint 7. Looking east towards the site. Traffic lights within Periton are just visible in the centre of the image.

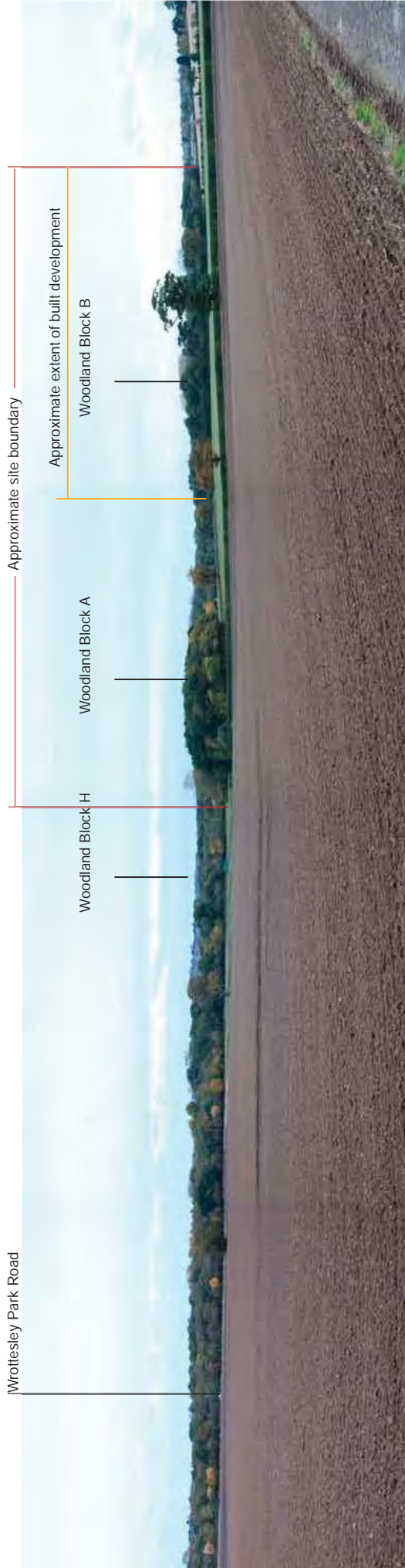
KEY

Refer to drawing IL41194-0021

Indicative location of proposed woodland planting between woodland blocks B and C



Viewpoint 8. Looking south east towards the site from the footpath connecting Wrottesley Park Road to the Staffordshire Way.



Viewpoint 9. Looking south east towards the site from public footpath south east of Wrottesley Hall.

KEY

Indicative location of proposed woodland planting between woodland blocks B and C

Refer to drawing IL41194-0021

Appendix 4 Landscape Quality

It is noted in the SSC 'Methodology Sites Paper' that consideration of Countryside/Landscape Sensitivity has been directly informed by the Council's Landscape Sensitivity Study 2015.

The Methodology Paper makes reference to how the Landscape Study parcels which have been identified as having more than one sensitivity rating have been colour coded. It states that "an Amber categorisation indicates that part of the site includes a highly sensitive landscape, with another part of the site including landscape categorised as medium sensitivity. Similarly a light green categorisation indicates that part of the site includes a landscape that is judged as low sensitivity". In summary, this approach would correspond to the following scoring:

Table A.4 Landscape Sensitivity Rating and Corresponding RAG Colour Score

Landscape Sensitivity Rating	Corresponding RAG Colour Score
High	Red
High/Medium	Orange
Medium	Yellow
Medium/Low	Light Green
Low	Dark Green
High/Low*	Dark Green

* Where low sensitivity adjacent to development boundary and large enough to accommodate entire allocation for village, so in effect development is contained within the low sensitivity area only.

However, when the Landscape Sensitivity Report ratings are compared with the equivalent SAD Site Assessment the RAG colour score in the Site Assessment does not accurately reflect the scores from the Landscape Sensitivity Report. The differences are summarised in the table below. For example, site 239 has a medium rating but the RAG colour score it has been given is "low impact". Alternatively, site 407 is rated as medium/high within the Landscape sensitivity report but again it is given a "low impact" dark green Site Assessment rating.

Table A.5 Landscape Sensitivity Ratings

Perton Site ref	Landscape Sensitivity Study (2015) Parcel Ref	Landscape Sensitivity Study (2015) Rating	SAD Site Assessment Score
238a	PN3	High/low	Dark Green
239	PN4	Medium	Dark Green
241	PN1	High	Red
246a/467	PN5	High	Red
402	PN3	High	Red
407	PN4	Medium/High	Dark Green
454	PN1	High	Orange

We also disagree with the approach taken in respect of site 238a categorised as high/low in the Landscape Sensitivity report and then correspondingly given a “Low impact” overall rating. The assessment should be undertaken purely on landscape terms without consideration to the site’s capacity for future development, especially as against the other site assessment criteria individual sites have not been subdivided for assessment in this way. If it is apparent that only part of a site is suitable for development, or merits dedicated consideration, the site option should be defined accordingly. In the case of Perton Green the opposite is true, with the Council assessing two options, which may otherwise score differently, under one site reference.

Landscape Sensitivity Report

A brief review of the Landscape Sensitivity Report has also identified a number of issues with the approach taken in assessing sites around Perton, including the following:

- a The site boundary for Parcel PN5 only includes part of site 246a/467 and does not include site 246a in full.
- b Parcel PN3 has been labelled as partly low and partly high in sensitivity. It is considered unlikely that the landscape sensitivity changes as dramatically as this between the two parts of the site, without in the very least a ‘medium’ zone in between. The scoring of Parcel PN2 which adjoins PN3 is ‘medium’ compared to the low/high rating of PN3, also raises concerns.
- c The assessment of sensitivity appears to be heavily weighted towards the influence of neighbouring areas of built development, whereby parts of the parcel adjacent to such areas are considered less sensitive than those further away (hence the broad subdivision of parcels PN4 and PN3).

With respect to the Perton Green site (which is labelled incorrectly as PN4 of the Perton Landscape Assessment map on page 20), there are a number of the comments on the site proforma for PN5 (page 435) which are incorrect. In particular, the site is not “*remote from any built form*” as it includes the Cranmoor Lodge development, which comprises approximately 22 residential dwellings. This is a significant area of built development on brownfield land within the green belt. The planning history for the site shows that it has been subject to a number of redevelopment and infill developments over the previous few years, including most recently the planning permission for conversion of a redundant agricultural building to provide 4 dwellings (LPA ref: 15/00181)

The Perton Green site also includes an existing farm shop and an extensive area of hard-standing in the form of its car park. This also represents a significant element of built development of urban character within the landscape.

Overall, it is considered that the existing land use should be identified as “agricultural and residential” and the land cover as “farmland and built development”. It is considered this would reduce the landscape sensitivity of the site from high to medium.

Revised Landscape Quality Site Assessment

A ‘medium’ rating for Perton Green (246a/467) and the correct transfer of the Report’s findings in respect of the other sites, leads to RAG Site Assessment scores for landscape quality which should read as follows:

Table A.6 Landscape Quality - Summary of Scoring and Alternative Scoring

Perton Site ref	Landscape Sensitivity Study (2015) Parcel Ref	Landscape Sensitivity Study (2015) Rating	SAD Site Assessment RAG Score	Revised Landscape Sensitivity Rating	Revised SAD Assessment RAG score
238a	PN3	High/low	Green	High/low	Yellow
239	PN4	Medium	Green	Medium	Yellow
241	PN1	High	Red	High	Red
246a/467	PN5	High	Red	Medium	Yellow
402	PN3	High	Red	High	Red
407	PN4	High/Medium	Green	High/Medium	Yellow
454	PN1	High	Yellow	High	Red

Appendix 5 Hurlstone Partnership Letter (9 February 2016): Highways Review

The Hurlstone Partnership

Seven Oaks Farm, Crew Green, Shrewsbury SY5 9AS

Tel: 01743 884849

e-mail: office@hurlstones.com

Fax: 01743 884947

Mrs S. Beard
Bradshaws Estates
The Bradshaws
Codsall
WV8 2HU

Our Ref: JPH/jph/140411

09 February 2016

Dear Mrs Beard

SOUTH STAFFORDSHIRE COUNCIL SITE ALLOCATIONS DOCUMENT (SAD) SITE ASSESSMENT AND DISCOUNTED SITES TOPIC PAPER

1. Further to your recent instructions, we are pleased to confirm the findings of my review of the above document and the investigations I have undertaken into the derivation of the ranking system adopted therein with respect to highway and transport matters.
2. I have spoken with Staffordshire County Council Highways to confirm the extent of the detailed assessment of all potential development sites supplied by the Highway Authority, as referenced in the Matrix Topic Paper under section 2 "*Evidence Base*".
3. The Highway Authority has confirmed it has only undertaken a preliminary 'high level' review of the sites and the potential constraints that may limit their suitability to accommodate further development in the future. I can confirm that the entirety of the Highway Authority's findings are presented in the colour keyed table entitled "*Staffordshire County Council – highway access comments*". I am advised that there is no further background documentation or report that has led to the production of that table by the Highway Authority.
4. The Highway Authority has not undertaken a detailed review of the sites or their associated transport implications, as has been assumed by South Staffordshire Council. The detailed review could only be undertaken once traffic flow information and capacity assessments have been carried out. In that regard, the submissions for the Perton Green site 246a/467 are more advanced than the alternative sites, in that we have provided details of baseline and development traffic volumes, together with a detailed assessment of the A41/Wrottesley Park Road signal controlled junction, which is the most constrained junction in the locality, to confirm that subject to the improvements proposed as part of our site, the residential development can be accommodated.
5. The level of assessment for the A41 junction submitted to the Highway Authority, which it has reviewed and approved, is consistent with that included within a Transport Assessment submitted as part of a planning application. Whilst we did not submit the capacity analyses for the roundabout and proposed priority junction access to the north of it, which provide the direct access to the site, it is our understanding that neither are likely to be a constraint to development, which is also a view taken by the consultants (TPA) acting for the promoter of site 239 when considering the direct access to that land.
6. Notwithstanding the limited detail included within the Highway Authority's review of the sites, the South Staffordshire County Council "*Site Allocations Document (SAD) Site Assessment and Discounted Sites Topic Paper*" appears to place a significant amount of weight on the Highway Authority's comments. I believe the weight the planning authority places on the Highway Authority's comments is misplaced and therefore its conclusions are

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misguided in terms of its appraisal of sites 238a, 239, 241, 246a/467, 402, 407 and 454 in terms of transport matters.

7. Reviewing pages 40 – 42 of the SAD document referred to above, reveals two sites have been taken forward for consideration against tier 2 criteria; those being sites 239 and 407. Site 239 is the site to the east of the golf course and west of Wrottesley Park Road and has development capacity of 340 – 425 dwellings. Site 407 is immediately to the north of it and has a development capacity of 482 - 602 dwellings (Figures taken from the Highway Authority's highway access comments table). I am not aware of any detailed assessments being undertaken for either of these sites, beyond the TPA Technical Note for site 239 which is considered below. I also note that the *Site Allocations Document (SAD) Site Assessment and Discounted Sites Topic Paper* does not provide consistent notes for the transport related sub-headings from site to site. Some of the sites have no comment under the topic of 'Accessibility' whereas others do, whilst all have comments related to 'Accessibility to amenities'. There does not appear to be any coherent reason for this inconsistency between the sites.
8. From my discussions with the Highway Authority, I understand that none of the promoters of the alternative sites have submitted any detailed submissions in terms of traffic generation or distribution. A *Technical Note on Transport Issues associated with site 239 (Land at Wrottesley Park Road (South))* has been prepared by TPA. The document dated May 2014 confirms traffic surveys at the roundabout with The Parkway, from which the site would be accessed, were undertaken in December 2011 to establish baseline traffic flows. Paragraph 2.13 of the document confirms the majority of vehicles head north towards the A41 in the morning and south during the evening peak hours. Section 4 of the development includes indicative trip generations for the site based on developments of 166 units plus an additional 175 units. No information is provided in terms of the traffic distribution, but it is suggested that the actual traffic generations may be lower due to the implementation of a Travel Plan. It concludes that the development would not result in a severe impact in the context of NPPF. However, it is apparent from the text immediately following that claim, within paragraph 4.3 *"This will be assessed in detail as part of the Transport Assessment prepared as part of the planning application, which will consider the need for off-site mitigation measures where deemed appropriate."*
9. It is therefore apparent that the information provided to the Highway Authority for site 239 has not considered the requirement for off-site mitigation measures at present. As a result, the Highway Authority is not in a position to consider the impact of the development on the network or the requirement for off-site improvements for site 239 at this stage. However, it is known that the Wrottesley Park Road corridor is congested due to the capacity constraints at the A41 signals, which is why you committed resources to undertaking detailed traffic counts, queue length surveys, development traffic calculations associated with 339 dwellings and 1500 m2 of employment use, calculation of its distribution and junction capacity assessments, in order to ensure that the proposal would not exacerbate existing queues and delays, which are a significant concern to local residents, as confirmed at the public exhibitions. The assessment undertaken indicates the proposed improvements would provide an overall level of betterment when compared with the current situation even with the additional development traffic added to the baseline flows. Two improvement options were provided at the A41 junction using land under your control.
10. Based on the improvement layout submitted and associated capacity analysis incorporating the development traffic from the Perton Green/Bradshaws site, the Highway Authority confirmed that the proposed improvements at the junction were satisfactory to mitigate the impact of the development, subject to detailed design, which would normally take place as part of a S278 package following the granting of planning permission.
11. Section 3 of the TPA Technical Note provides a review of the accessibility of site 239 to a range of services and facilities, including a description of the local footway/cycle infrastructure, which connects to the roundabout, which is also mentioned at section 7 in paragraph 7.4.
12. Section 5 of the TPA Technical Note describes the proposed access to the roundabout and a potential priority junction to the north to serve the further development. It confirms the proposal to increase the diameter of the

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existing roundabout to accommodate the additional arm to provide access to the site. In terms of the northern access, the potential for a ghost island is considered, together with the requirement for associated carriageway widening and loss of hedgerow to achieve the required visibility splays. Another option is also identified which includes the realignment of Wrottesley Park Road.

13. These improvements may be compared with those proposed for the Perton Green sites 246a (the initial residential development 340 – 425 dwellings) and 467, which includes 246a plus an additional area to the north. The access to site 246a would be an additional arm from the existing roundabout. Our initial design indicates it would not be necessary to enlarge the ICD of the roundabout to accommodate the development, which could accommodate up to 425 dwellings. When including the land to the north, further accesses to Wrottesley Park Road were identified, in the form of priority junctions with ghost-island right turning lanes. The design of the right turning lanes is based upon standards dictated by the design speed of the road. The 40 mph speed limit is consistent along Wrottesley Park Road and therefore the comparable priority junctions between sites 246a/467 and 239/407 would be very similar in terms of their geometric layout.
14. In terms of site 407, it is noted that there is no apparent footway cycleway link between the roundabout to the site from which site 239 would be accessed and the roundabout to the north from which site 246a/467 could be accessed. Therefore, unlike site 467, which benefits from a footway cycleway along the length of the site frontage on the east side of Wrottesley Park Road to which crossing points are proposed, unless an indirect route through the development to the south were proposed, additional infrastructure would be required to secure pedestrian/cycle access to site 407. It is noted that the *Site Allocations Document (SAD) Site Assessment and Discounted Sites Topic Paper* highlights the lack of a footway at site 407 in the following terms: "*Potential pedestrian safety concerns due to lack of footpath along the Wrottesley Park Road*". However, this does not appear to have detracted from its high ranking within the table; both overall and when assessed in terms of transport matters.
15. Given the distribution of traffic observed by TPA and derived from the later surveys undertaken on behalf of Bradshaws Estates, it is apparent that the majority of traffic heads to and from the A41 during the AM and PM peak hours respectively. As sites 246a/467 and 239/407 all lie to the west of Wrottesley Park Road and are relatively close to each other, beyond the minor variations in terms of the traffic routes into/out of Perton due to their relative juxtapositions to the roundabouts, the same level of development on either site would result in the same volume of traffic being generated and travelling along the same route to/from the A41.
16. It is therefore difficult to comprehend how the Highway Authority has concluded that for site 246a/467 the caveat of "*...although significant highways improvements likely to be required*." has been added to the access being "*Ok in principle with access off existing roundabout*"; noting that Site 239 is identified as being "*Ok in principle, access off existing roundabout to be considered*" and site 407 is identified as being "*Ok in principle for vehicles. Pedestrian accessibility to be considered further*." As indicated above, the access to site 239 requires the enlargement of the junction. The issue of pedestrian access is also a constraint at site 407 due to the absence of linkage along Wrottesley Park Road. Given the weight placed upon access by non-car modes, it is therefore surprising that site 407 is apparently ranked higher than site 246a/467 where no such constraint is identified.
17. It appears to me that site 246a/467 has been unjustifiably penalised within the transport/access rankings based upon the erroneous conclusion that it would be likely to require significant highway improvements. It would appear that by undertaking a more detailed appraisal of the off-site impact of development along the Wrottesley Park Road corridor on the A41 junction, and by providing a mitigating solution on land under Bradshaws Estates' control, your site has been unfairly penalised. As stated above, it does not matter from which site the traffic is generated, the impact for a comparable number of units on the highway corridor will be, to all intents and purposes, the same. The benefit that sites 246a/467 have over the alternative options is that the landowner also controls the land at the A41 junction, within which the improvements required in order to avoid increased delays and congestion, would be delivered. As a result, sites 246a/467 should fairly be placed at the top of the ranking in terms of Highways Accessibility within the Highway Authority's assessment.

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18. I understand that the concern regarding the significant highway improvements suggested for sites 246a/467 may be based upon an Officer's misunderstanding that the improvements would place an additional burden on the public purse. However, as you are aware, highway improvements associated with development sites such as these are generally funded by the development, with the developer being responsible for meeting costs associated with design, construction and local authority approvals. I understand that this will be the case for sites 246a/467, which would fully fund the potential improvement works proposed, which are illustrated on the enclosed plans, Figures 1 to 3 dated May 2014 and on the sketch of the potential Bridleway crossing of Wrottesley Park Road.
19. Of the sites considered in the *Site Allocations Document (SAD) Site Assessment and Discounted Sites Topic Paper*, in terms of "Accessibility to Amenities (incl Employment)", sites 238a, 239, 246a/467 and 407 are ranked equally with a light green rating. The test applied by the document is "How the site sits in relation to facilities such as schools, shopping, medical, community centres, allotments etc within the village". In terms of the distances from the sites to the various facilities within Perton, this would appear reasonable, as some will be closer to a given facility than others and vice-versa, leading to an overall balance when comparing them. However, in order to reach this equity, South Staffordshire Council must presumably assume that the question-mark as to whether site 238a can be accessed from Edge Hill Drive, and that the pedestrian access issue highlight with respect to site 407, which were highlighted in the Highway Authority's appraisal, can be overcome.
20. Sites 241 and 454 are ranked lower with a yellow rating, on the basis that vehicular access to the sites has not been confirmed. It is noted that these concerns raised a red (Unsuitable) rating in the Highway Authority's appraisal of the sites. The Highway Authority identifies concerns regarding the delivery of access to these sites, due to the obvious routes being via roads under Wolverhampton City Council's control; noting the long history of that Authority in terms of resisting the direct linking of development within Perton to the City Council's road network.
21. Site 402 has been rated as red by South Staffordshire Council on the basis that it is only accessible in conjunction with site 238a. Due to this constraint, the Highway Authority ranked site 402 as amber ("*concerns it is not achievable – detailed highways assessment required to demonstrate deliverability*"). It is not clear why the site has subsequently been downgraded to red by the Planning Authority.
22. The other transport related ranking within the *Site Allocations Document (SAD) Site Assessment and Discounted Sites Topic Paper* is "Highways (accessibility to the site)", which is described in the document as "How the site has been assessed by highways officers in terms of the access to the site". In this case, all of the colour coding reflects that provided by the Highway Authority. Sites 239 and 407 are ranked at the top of the sites in light green. Site 238a is ranked in yellow, which is the same ranking given to site 246a/467. As stated above, the Highway Authority sought to confirm access from Edge Hill Drive to site 238a. Even if this was confirmed, given there is a restriction on the right turn from Pattingham Road to Wrottesley Park Road and the left turn travelling in the opposite direction, when taking into account the distribution of traffic towards the A41 to the north, an access to site 238a via Edge Hill Drive would result in the majority of traffic travelling through the existing streets of Perton in order to access the wider highway network. As a result, its impact is likely to be greater than sites 239, 407 and 246a/467, which would benefit from direct access to Wrottesley Park Road and therefore avoid routing through traffic along the existing residential streets within Perton.
23. I have already compared the relative merits of sites 239, 407 and 246a/467 with reference to the apparent inequity in the suggestion that only the latter would trigger the potential need for significant highway improvements and the fact that only Bradshaws Estates holds the land required to implement the works, irrespective of which site(s) contains the dwellings. On this basis, I reiterate my earlier comments that I believe sites 246a/467 should be placed at the top of the rankings when considering these three sites.

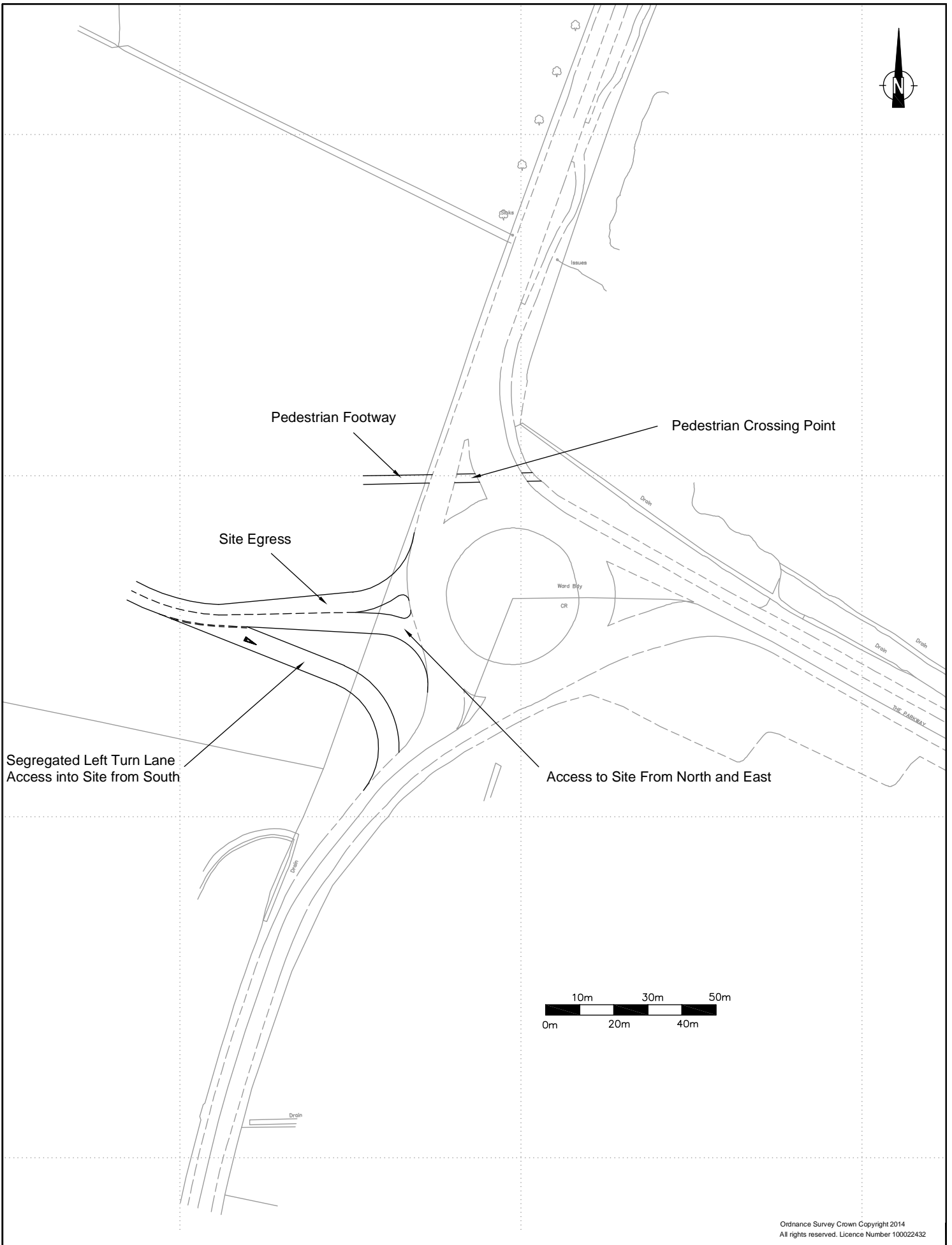
The Hurlstone Partnership

24. Site 402 could only be accessed with site 238a and is therefore subject to the same comments made above with respect to that site and routing traffic through the existing streets in order to access the wider highway network. As a result its amber rating is understandable. Sites 241 and 454 are ranked as red and were considered above.
25. In summary, there are significant and inexplicable inconsistencies within the assessments and rankings provided by both the Highway and Planning Authorities, which cast significant doubt upon the weight that can be given to the findings of the ranking system and conclusions reached from it.
26. I trust the foregoing is of assistance in your consideration of how best to respond to the Council. However, should you have any queries or require any further assistance, please do not hesitate to contact me on 01743 884849 or 07875 399325.

Yours sincerely

Jeremy Hurlstone
for THE HURLSTONE PARTNERSHIP

Encl.



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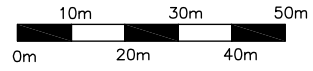
Tel: 01743 884849 Fax: 01743 884947

e-mail: office@hurlstones.com

Proposed Development at Perton Green, Wrottesley Park Road
Potential Access Arrangement to Site from Roundabout
Illustrative Layout

SCALE: 1:1000 @ A3 DATE: May 2014 DWG NO. Figure 1

Rev	Amendments	Date



Proposed Access to
Employment Development

Pedestrian Footway

Pedestrian Crossing Point

Existing Farm Shop

Proposed Access to
Shop & Development

Carriageway Widened to Provide
Ghost Island Right Turn Lanes at Accesses

Pedestrian Footway

Pedestrian Crossing Point

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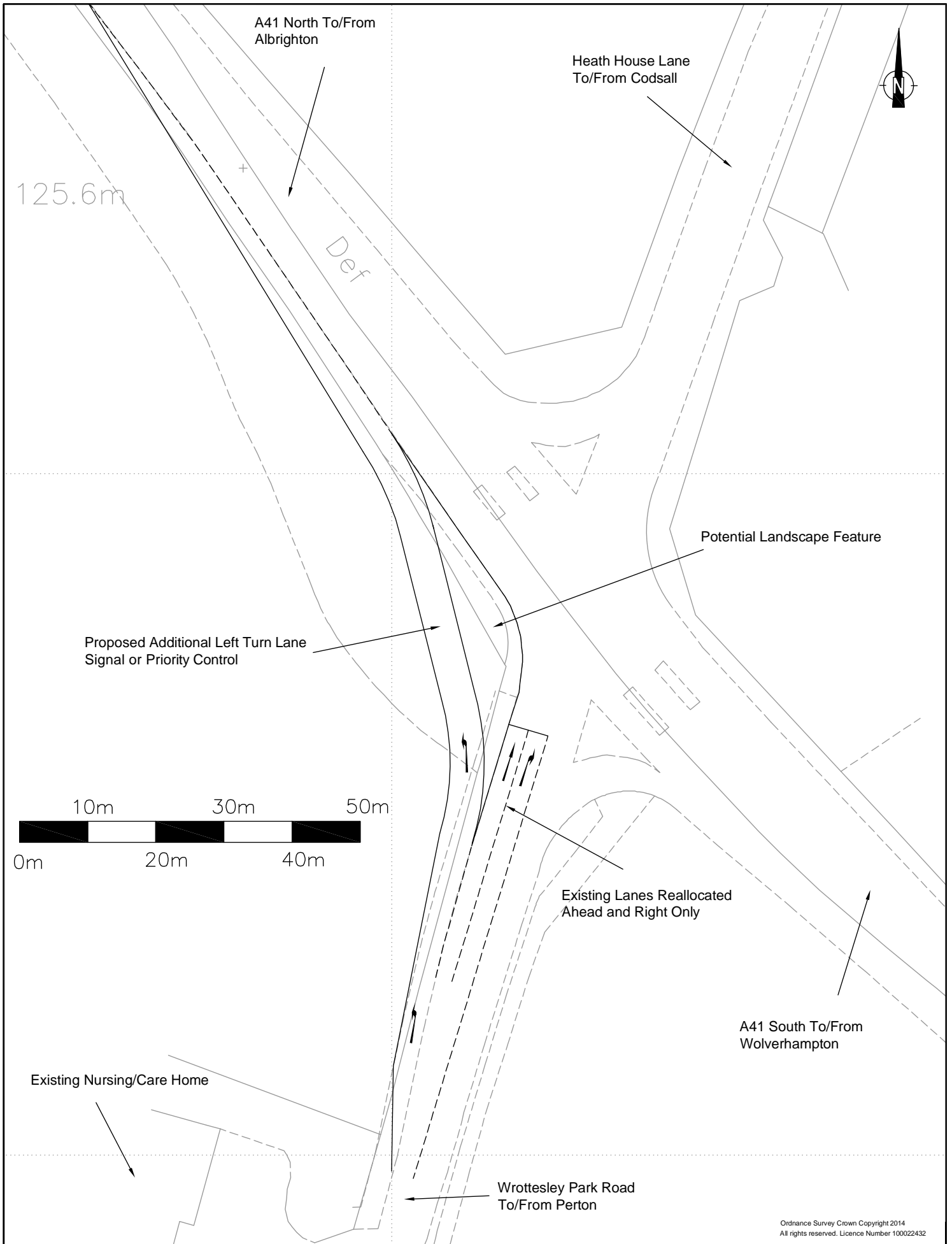
Proposed Development at Perton Green, Wrottesley Park Road
Potential Access Arrangement to Shop & Employment Land
Illustrative Layout

SCALE: 1:1000 @ A3

DATE: May 2014

DWG NO. Figure 2

Rev	Amendments	Date



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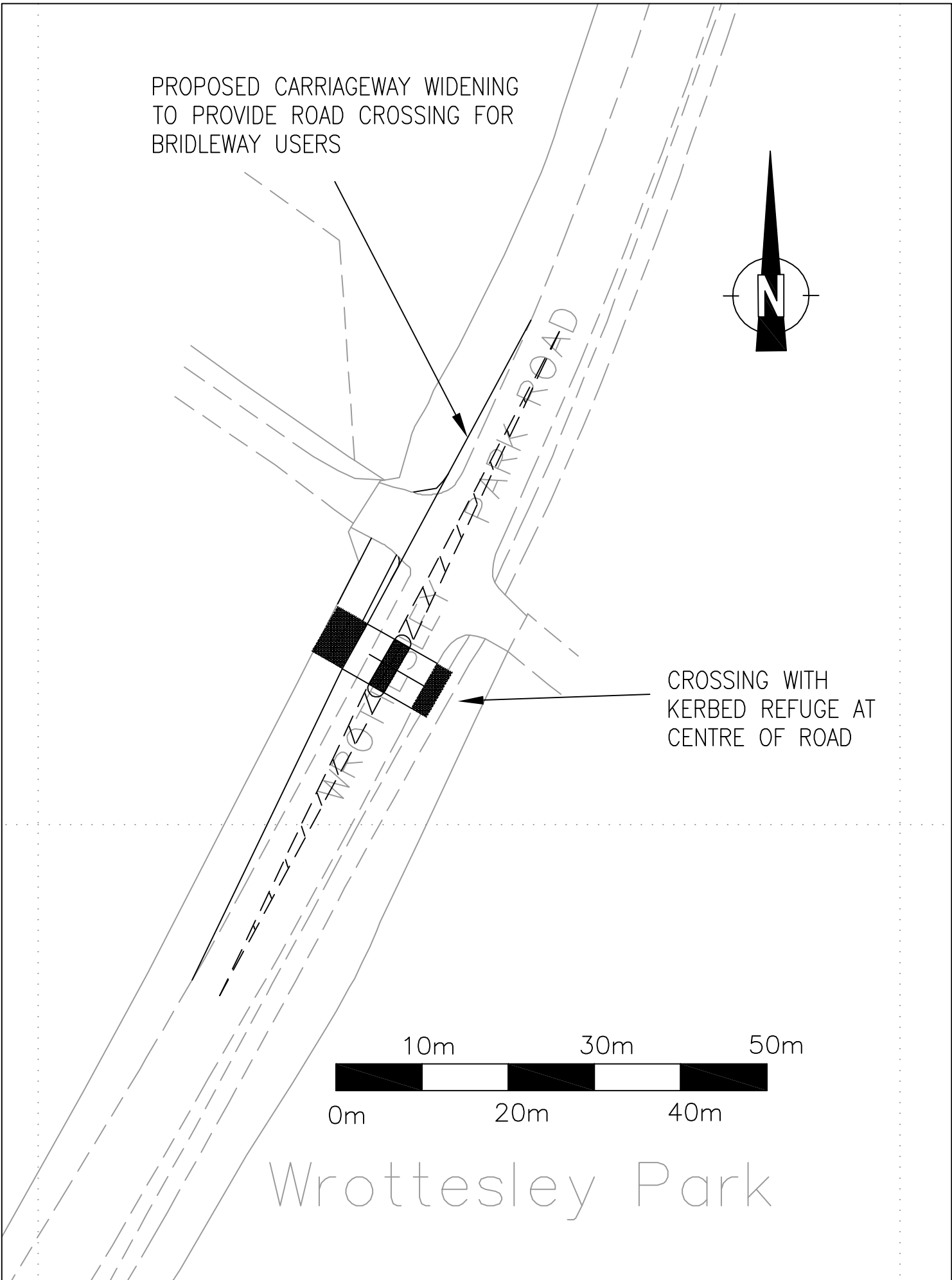
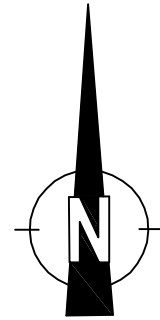
e-mail: office@hurlstones.com

Proposed Development at Perton Green, Wrottesley Park Road
Potential Improvement to A41 Traffic Lights
Illustrative Layout

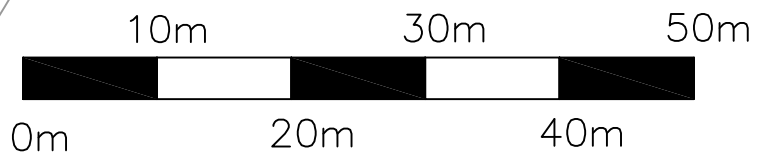
SCALE: 1:500 @ A3 DATE: May 2014 DWG NO. Figure 3

Rev	Amendments	Date

PROPOSED CARRIAGEWAY WIDENING
TO PROVIDE ROAD CROSSING FOR
BRIDLEWAY USERS



CROSSING WITH
KERBED REFUGE AT
CENTRE OF ROAD



Wrotesley Park

Appendix 6 Corrected Perton Sites Tier 1 Scoring & Ranking

Perton Site ref	Sequ. Test	Green Belt	Landscape Sensitivity	Access to Amenities	Surface Water Flooding	Highways Access.	Impact on Land Use and Loss of Facilities	Natural Environ.	Environ. Quality	Impact on Historic Environ./ Heritage	Total	Ranking
238a		5	4	2	2	3	3	2	2	2	25	3
239		3	3	2	2	2	3	2	2	2	21	2
241		5	5	3	2	5	2	3	2	2	29	5
246a/467		4	3	2	2	1	2	2	2	2	20	1
402		5	5	5	1	4	2	2	2	2	28	4
407		2	4	2	2	2	2	3	2	2	21	2
454		5	5	3	2	5	2	3	2	2	29	5
Weighted Scores		Extr. High	High	High	High	High	High	Medium	Medium	Medium		
Weighting Factor		3	2	2	2	2	2	1	1	1		
238a		15	8	4	4	6	6	2	2	2	49	4
239		9	6	4	4	4	6	2	2	2	39	3
241		15	10	6	4	10	4	3	2	2	56	6
246a/467		12	6	4	4	2	4	2	2	2	38	2
402		15	10	10	2	8	4	2	2	2	55	5
407		6	8	4	4	4	4	3	2	2	37	1
454		15	10	6	4	10	4	3	2	2	56	6
		Score change from SSC Site Assessment										

Note of changes

Green Belt	Corrected scores from review of LUC Green Belt Review
Landscape	Correct transfer of Landscape Sensitivity scores and consideration of existing built development on Perton Green site
Surface Water Flooding	Upgrade of 246a/467 and 454 as Environment Agency data shows no difference in flood risk or surface water drainage issues
Highways Accessibility	246a/467 upgraded due to significant junction improvements and ease of creating new access into the site
Impact on Land Use and Loss of Facilities	Sites with better agricultural land classifications upgraded to light green
Impact on Historic Environment/Heritage	Sites 239, 246a/467, 407 upgraded due to HER not restricting development of the site

Appendix 7 Review of Community Consultation

The NPPF (Annex 2) highlights that Local Plans, which in South Staffordshire includes the Site Allocations document, should be “*drawn up by the local planning authority in consultation with the community*”. Furthermore, the NPPF stresses the importance of early and meaningful engagement and collaboration with neighbourhoods so that plans reflect the vision and aspirations of local communities. The Core Strategy 2012 states that “*engagement with local communities and the effectiveness of the consultation processes will be an important part of the Site Allocations DPD*” (our emphasis).

It is understood that the Community Council of Staffordshire was appointed by SSC as part of the Local Plan Consultation Process to undertake an independent consultation exercise across the District. The results of the work were published in the “South Staffordshire Site Allocations Consultation Report” (dated November 2014). However, the conclusion of the Community Council’s Report on the consultation undertaken with respect to Perton is potentially misleading as it does not fully reflect the high level of local support for the Perton Green site.

To elaborate, within Perton the consultation was undertaken as a joint venture with the Parish Council in April 2014. Our client and her professional team also attended the event in order to gain local views on their emerging proposals for the Perton Green site and the feedback received has been valuable in shaping their future proposals for the site.

Our client and her team observed an extremely high level of public support for site 246a at the public consultation event. This is partly reflected in the Community Consultation Report, principally by the plan of the village (page 123) where visitors places ‘yes’ or ‘no’ dots on the various potential green belt release sites. The plan illustrate a clear cluster of predominantly green ‘yes’ dots on site 246a.

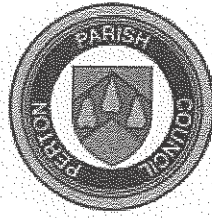
Within the accompanying analysis it is not clear how local people were asked which sites would be their preference for release although we understand each attendee was provided with the green dot and the red dot to indicate their preferences. Nevertheless, both sets of figures provided in the report (the ‘housing site preferences’ on page 15 and ‘initial feedback on-site preferences’, page 9) refer to high levels of support for site 246a which appears to be much higher, both in terms of overall percentage and actual numbers, than the next preferred option.

On this basis, it is considered that the conclusion in the report relating to Perton is incorrect in stating that sites “*246a and 239 were identified as the most favoured [sites] by those attending the meeting*”. The conclusion should more accurately identify 246a alone as the most preferred site.

In addition, we note that Perton Parish Council also identify site 246a as their first choice for green belt release (letter dated 16 May 2014, attached at Appendix 8). They highlight the many unique benefits which the site can provide including improvements to local traffic congestion and access arrangements, good access to local schools, shops and facilities. Our client's position that the site can best meet the needs of local people, is therefore supported by the Parish Council.

The NPPF, alongside the Government's Localism agenda, seeks to "*empower local people to shape their surroundings, including giving local communities greater control over local decisions*" (NPPF Core Planning Principle). Furthermore, it is noted that the SCC Statement of Community Consultation (dated April 2014) also identifies that the "*Council will publicly respond to the collective views of local communities and organisations, and ensure that these opinions taken into account as an integral part of the decision-making process.*" On this basis the high level of local support for Perton Green demonstrated above should be afforded significant weight in the Tier 2 assessment of sites

Appendix 8 Perton Parish Council Letter (16 May 2014)



PERTON PARISH COUNCIL

Your Ref: SAD

Our Ref: 160514

Tony Tappenden

PARISH CLERK

16th May 2014

Kelly Harris
Local Plans Team Leader
South Staffordshire Council
Council Offices
Wolverhampton Road
Codsall
South Staffordshire
WV8 1PX

Dear Kelly,

New Homes – Site Allocation, Perton

Further to the Perton public consultation event held at Perton Civic Centre on Friday 9th May 2014 we understand that, in due course, a full report will be submitted by the Community Council of Staffordshire who conducted the Site Allocations consultation at the session on our behalf.

Meanwhile, at the Parish Council Meeting on Monday 12th May 2014, the Members conducted a full review of the consultation event, the available sites and the needs of Perton residents. Accordingly we now formally present our comments and recommendations for consideration within your own consultation exercise.

Initial Findings & Comments

During our consultation event five of the six proposed Perton sites were represented and it was very apparent that the land owners and their respective agents are very committed to the future building programme and their presentations were both informative and, in the main, very professional. Both our Members and local parishioners found the session to be very worthwhile and helpful in determining the strengths and weakness of each location.

Accordingly, following formal review, Perton Parish Council initially dismissed three sites as being fundamentally unsuitable. These are Site 241; Land off Dippons Lane, Site 402; Land at rear of Winceby Road and Site 238a; Land at

former Perton Court Farm. In each case it is felt that these sites have significant issues associated with access, both pedestrian and vehicular, and also give rise to problems associated with coalescence or encroachment on other settlements noting that we would wish to protect the existing natural green buffer zone between South Staffordshire and Wolverhampton.

Recommendations

Perton Parish Council is of the opinion that the three sites to the west of Perton are the most obvious and appropriate choices for a number of reasons and place them in the following order of preference:

3rd Choice: Site 407; Land west of Wrottesley Park Road (north)

2nd Choice: Site 239; Land west of Wrottesley Park Road (south)

1st Choice: Site 246a; Bradshaws Estate, Holyhead Road

In all three cases there are no significant issues of coalescence or encroachment and each of the sites has in common a number of perceived benefits. Site 407 is positioned as our third choice since its location is not regarded as enabling best possible access for both pedestrian and vehicular traffic. Similarly Site 239, whilst potentially offering very good vehicular and pedestrian access via the existing roundabout close to the golf course entrance, does not provide any significant reduction to traffic congestion which is a current local issue in advance of the construction of additional dwellings. Our first choice location has unique characteristics that provide opportunities not available at any other site. Our justification is shown below.

Justification for Site 246a; Bradshaws Estate - Preferred Site

Site 246a has been chosen, on a conditional basis, as our preferred site for several significant reasons some of which are unique to the location:

- There are no significant issues of coalescence or encroachment.
- Access for both pedestrian and vehicular traffic is straightforward with good infrastructure in-situ at the Northern roundabout which is roughly central to the site access.
- Good access to Perton schools, central shops and facilities plus easy access to existing main inbound and outbound routes.
- The site is of sufficient size to cope with the full allocation of required housing with scope for further expansion if needed in the future.
- Road Traffic arriving / departing the site does not make demands to the on-village road network except when accessing village facilities.
- A proposed extra lane to filter left on to the A41 which, it is anticipated, will considerably reduce current congestion at Wrottesley Park Road junction lights at the A41. This is a current point of significant traffic congestion, particularly during rush hour periods, which will be exacerbated by the provision of new dwellings regardless of where they are located.

- A proposed extra lane to access the farm shop which, it is anticipated, will considerably reduce current congestion on Wrottesley Park Road.
- A significant proposal exists to identify the cause of flooding in Perton Village and establish solutions.

Housing & Ancillary Needs

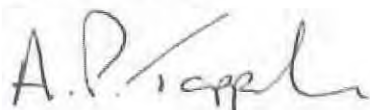
Perton Parish Council nominates Site 246a based upon the justification above, however we acknowledge that the site must be developed in an appropriate way in order that it merits our preference. The key deliverables are considered to be as follows:

- The housing mix should include a number of bungalows to meet the needs of our local ageing population. Similarly, but at the other end of the age spectrum, the housing mix should include a significant number of two bedroom homes. There is also a requirement for some larger detached homes.
- There is a significant waiting list for allotment gardens which is viewed, by the Parish Council, as a significant priority.
- It is hoped and expected that the chosen site will enable a significant contribution towards Youth provision. At the current time there is not a specific view as to what form this may take and it is envisaged that a financial contribution may be a possible option.
- There is a potential need for business provision but this is not likely to extend beyond the need for a small number of enterprise units / offices for small starter businesses.

Conditions of our Recommendation

Perton Parish Council has committed to Site 246a Bradshaws Estate as our preferred choice on a provisional basis. Our support is conditional upon the land owner making commitment to and delivering the significant elements listed above under 'Housing & Ancillary Needs' together with the traffic considerations and implementations also detailed above. These items are viewed as the key deliverables that were presented at our consultation event on 9th May 2014 and are fundamental to our decision. We attach a letter from The Bradshaws Estate, Sally Beard dated 29th April 2014, and whilst we recognise this as essentially a discussion paper we believe that it represents the spirit of the planned development at this site and would wish this document to be the starting point for future negotiations.

Yours sincerely,




Antony P Tappenden
Clerk to the Council



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0117 403 1980
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Cardiff
029 2043 5880
cardiff@lichfields.uk

Edinburgh
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edinburgh@lichfields.uk

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leeds@lichfields.uk

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london@lichfields.uk

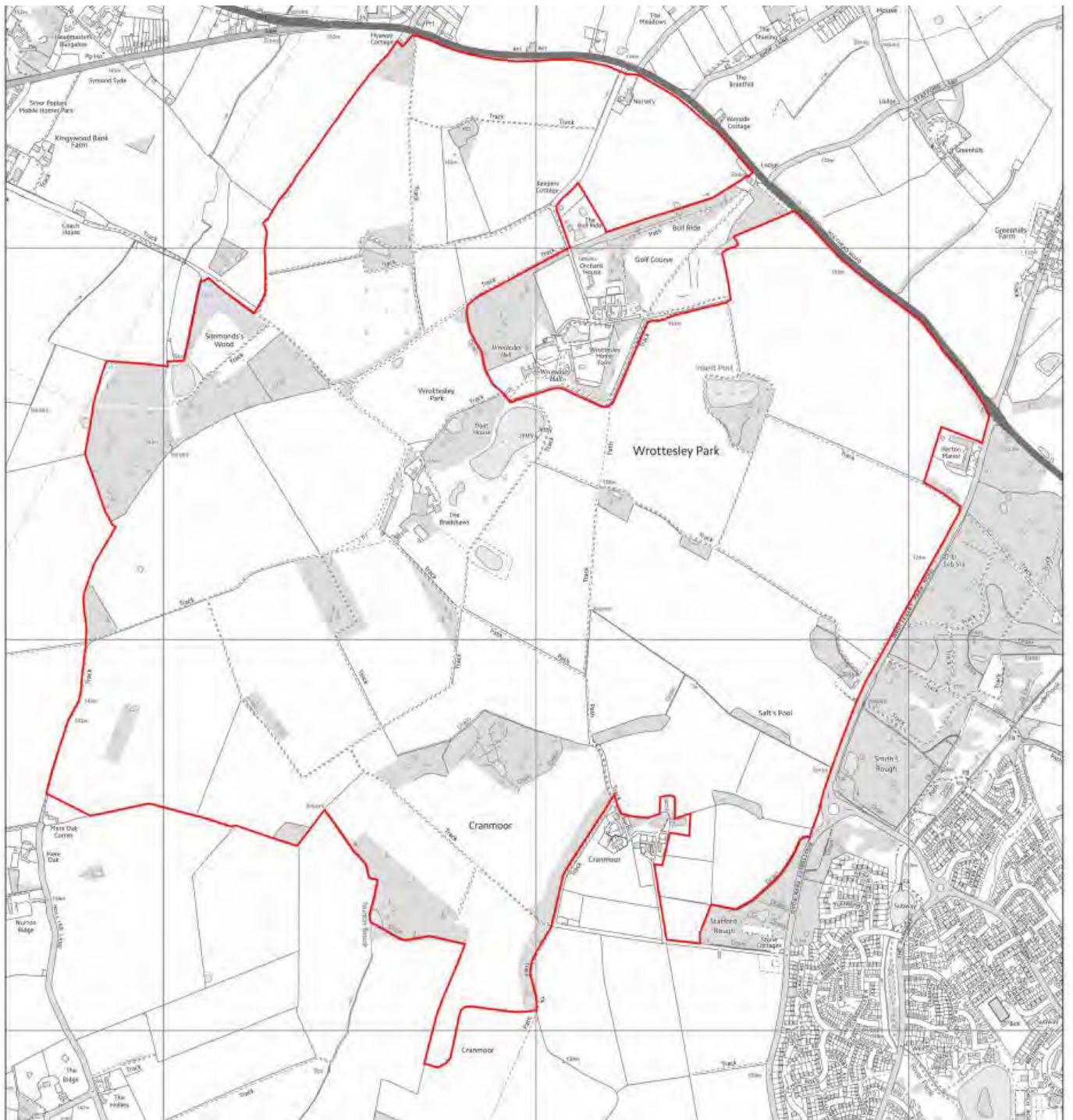
Manchester
0161 837 6130
manchester@lichfields.uk

Newcastle
0191 261 5685
newcastle@lichfields.uk

Thames Valley
0118 334 1920
thamesvalley@lichfields.uk

Appendix 2

Extent of Ownership Plan



Appendix 3

Red Line Plan – Care Home

Key

Site boundary



LICHFIELDS



Project: Penton
Title: Penton Green
Site Location Plan

Drawn: Mrs S B Board
Date: 27.10.2017
Scale: 1:2500 @ A2
Author: JH
Doc No: P-43194-03-023

Site location plan for Penton Green, Lichfields, Leicestershire. © Crown Copyright and National Mapping Agency. All rights reserved.



Appendix 4

Red Line Plan - 166



Key

Site boundary



Project **Perton**

Title **Perton Green
Site Location Plan**

Client **Mrs S R Beard**

Date **27.10.2017**

Scale **1:2500 @ A3**

Drawn by **LH**

Drg. No **PS41194-01-023**





Key

Site Boundary



Project **Perton Green**

Title **Indicative Masterplan**

Client **Mrs S R Beard**

Date **31.10.2017**

Scale **NTS**

Drawn by **PC**

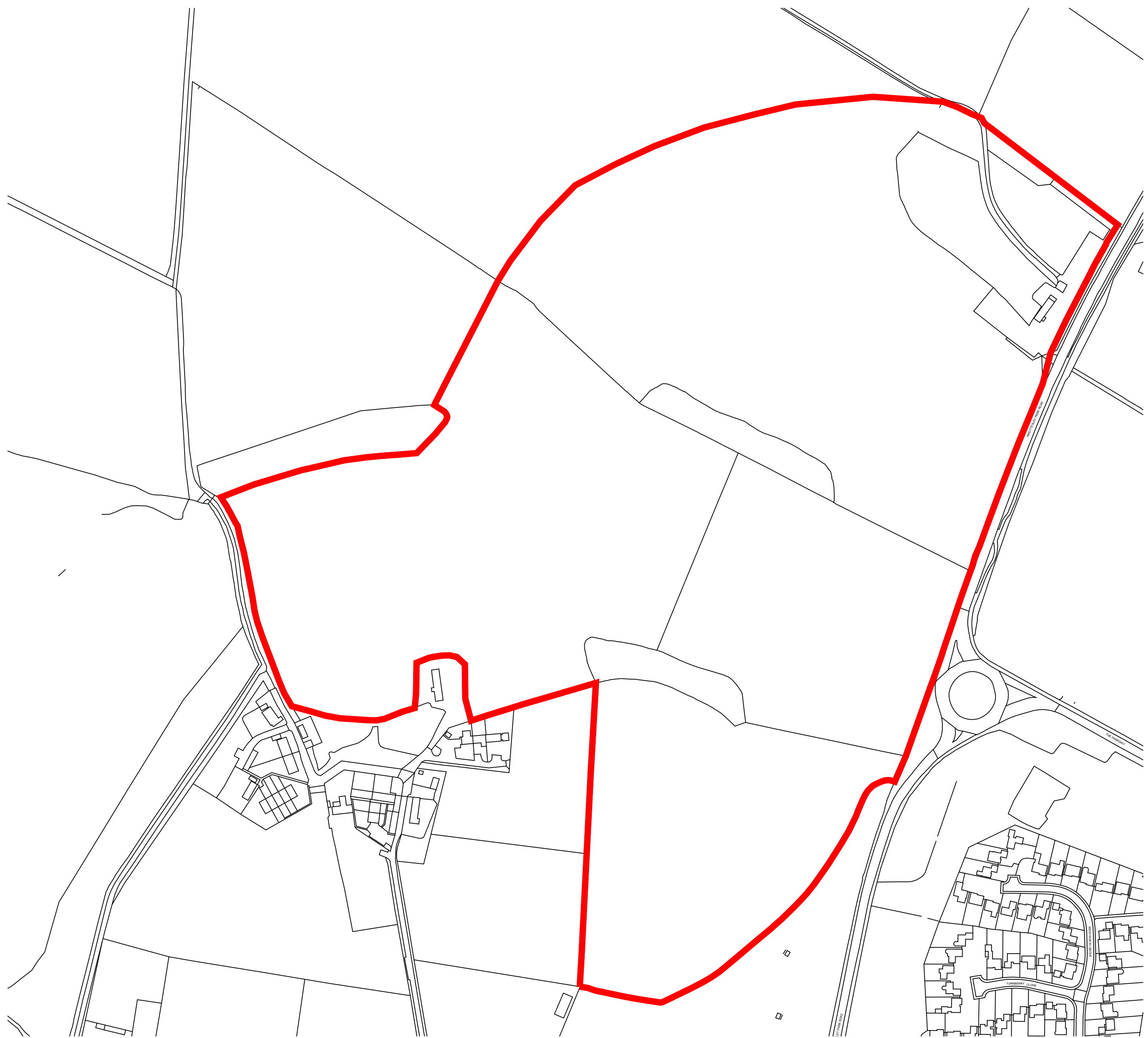
Drw. No **ID41194-01-020 RevC**



Appendix 5

Red Line Plan - 850

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 This drawing to be read in conjunction with the specification and other drawings
 Do not scale to ascertain dimensions
 All dimensions to be checked and verified on site by the responsible contractor prior to commencement of work



SITE AREA: 74.23 acres / 30.03 ha

revisions:

A	Site areas added to plan	W.L.	24.05.24

client
MR G. BEARD

project name
**PERTON GREEN,
 Wolverhampton,
 WV6 7XZ**

drawing name
**EXISTING
 Site Location Plan**

project no.	193-0624	scale	1:2500
drawing no.	01	revision	A
date	MAY '24	drawn by	W.L.

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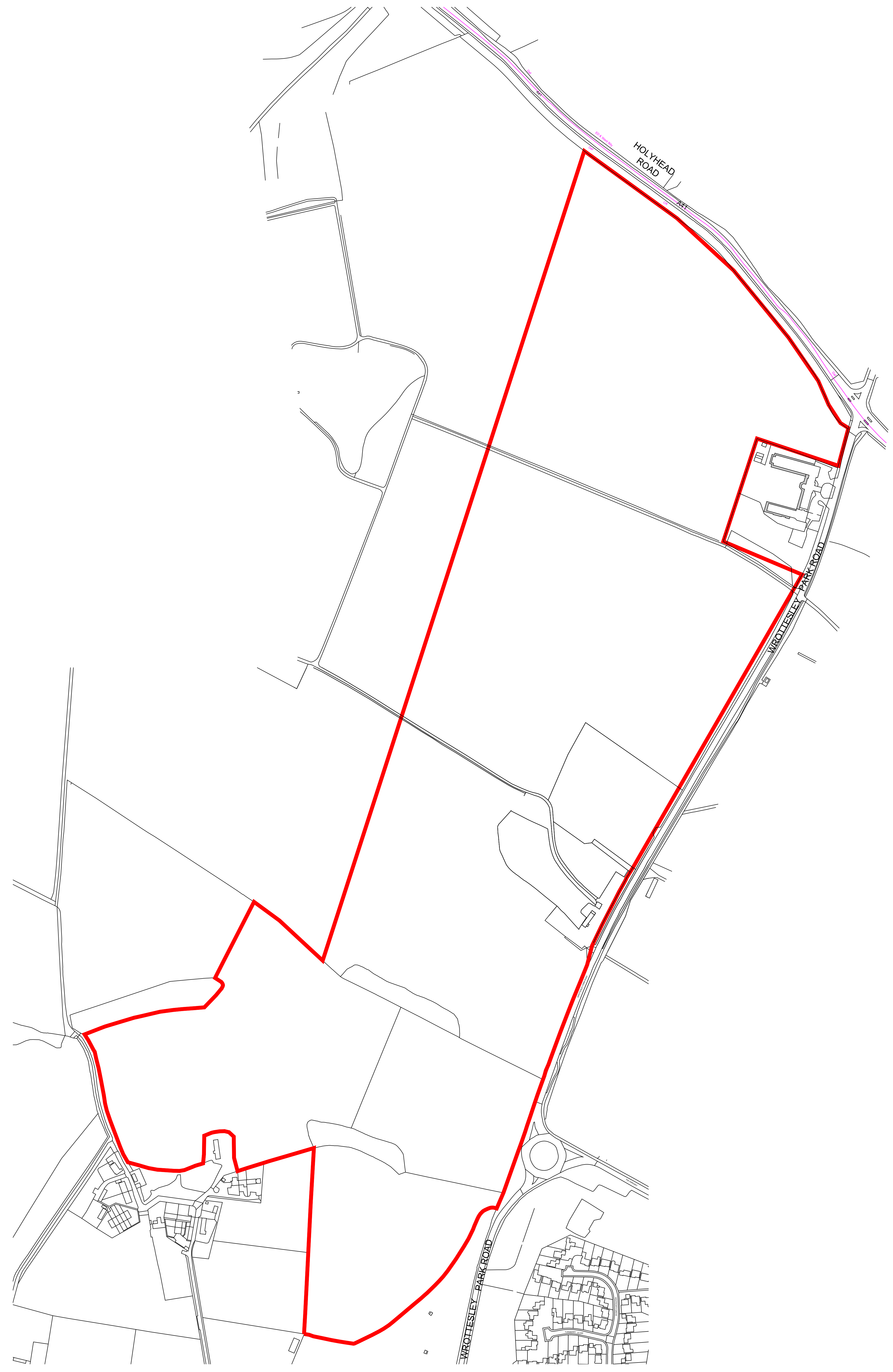


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Appendix 6

Red Line Plan - 2000



SITE AREA: 150.00 acres / 60.70 ha

revisions:			
no.	description	author	date
C	Site plan area decreased to be 150.00 acres following client's comments	W.L.	30.05.24
B	Site plan area increased following client's comments	W.L.	30.05.24
A	Site areas added to plan	W.L.	24.05.24

client
MR G. BEARD

project name
PERTON GREEN,
 Wolverhampton,
 WV6 7XZ

drawing name
EXISTING
 Site Location Plan

project no.	193-0624	scale	1:2500
drawing no.	01	revision	C
date	MAY '24	drawn by	W.L.

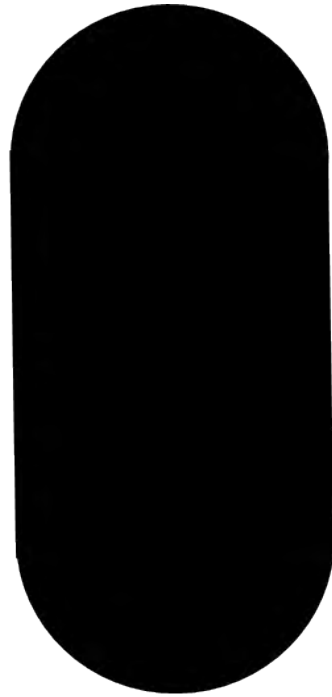
Appendix 7

Housing Needs Assessment prepared by Marrons



 Part of Shakespeare Martineau

**SOUTH STAFFORDSHIRE
HOUSING NEED ASSESSMENT**
PREPARED ON BEHALF OF BONINGDALE HOMES
MAY 2024



CONTENTS

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EXECUTIVE SUMMARY

- i. Planning Practice Guidance (PPG) requires local planning authorities to undertake an assessment of housing need. This assessment of housing *need* should be *unconstrained* and undertaken *before* considering constraints and land availability, and establishing a housing *requirement*.
- ii. The PPG provides a 'standard method' for calculating housing need. But the PPG is clear that the Standard Method provides a *minimum starting point* for assessing unconstrained housing need, and there could be circumstances which mean unconstrained housing need is higher. The National Planning Policy Framework (NPPF, December 2023) also states how the standard method is an 'advisory' starting point for assessing need, and is not compulsory.
- iii. The South Staffordshire Council (SSC) Publication Plan (Regulation 19) sets a housing requirement of 4,726 dwellings 2023-2041 (263 dwellings per annum – dpa). This is formed of South Staffordshire's requirement (4,086 dwellings, 227 dpa) and a contribution of 640 dwellings to the unmet housing need from the Greater Birmingham & Black Country Housing Market Area (GB&BCHMA) in which South Staffordshire is located.
- iv. The requirement for South Staffordshire (4,086 dwellings) corresponds with the NPPF's minimum calculation of housing need determined by the NPPF's standard method. This is set out in the Council's Strategic Housing Market Assessment Partial Update – February 2024 (2024 SHMA).
- v. Marrons analysis shows unconstrained housing need exceeds the standard method minimum.
- vi. The 2024 SHMA does not consider the level of housing need generated by the employment forecast (5,326 jobs 2020-2041) of the Council's March 2024 South Staffordshire Economic Development Needs Assessment Update (2024 EDNA).
- vii. Strategic Objective 6 of the Draft Plan emphasises the Draft Plan's commitment to economic growth, stating the Draft Plan *"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."*¹
- viii. It is therefore imperative to understand whether housing need in excess of the standard method minimum is required to support the labour force generated by the EDNA's job forecast. Marrons demographic modelling shows the standard method minimum will only support between 51 and 111 jobs 2023-2041.

¹ Page 22, South Staffordshire Publication Plan (Regulation 19), April 2024

- ix. To support the EDNA's job forecast and address household formation suppression, Marrons demographic modelling shows need of between 6,552 and 7,932 dwellings over the Plan period (364 dpa to 441 dpa).
 - x. Increasing affordable housing delivery is described as a key priority of the Council in the Draft Plan. The Council's 2022 SHMA determined affordable need to be 67 affordable dpa (adpa, 35% affordability threshold), 111 adpa (30% threshold), and 156 adpa (25% threshold). It also determined affordable need of 304 dpa if home ownership was the market access point.
 - xi. Net affordable delivery has been 67 adpa since 2011/12. Need appears to have been met based on a rent affordability threshold of 35%. However need increases to 111 adpa based on a 30% affordability ratio and delivery against need would be lacking on this basis.
 - xii. A housing waiting list which has increased by 73% since 2014 to 936 households, and the most recent monitoring year (2022/23) recording the highest number of households owed a relief duty for homelessness, indicates a 35% affordability threshold is too high.
 - xiii. South Staffordshire is one of the least affordable local authorities in the West Midlands. Its lower quartile affordability ratio in 2022 was the 4th highest in the region at 9.98. This means that the cheapest lower quartile market homes cost 9.98x the income of lower quartile
 - xiv. This deterioration in affordability has occurred despite the Council delivering their housing requirement between 2011 and 2023 indicating the requirement was too low to improve affordability, particularly for the lowest earners reflected by the lower quartile affordability.
 - xv. Outstanding unmet housing need from the Greater Birmingham & Black Country Housing Market Area (GB&BCHMA) is shown in this report to exceed 100,000 homes, despite what is planned in the local plans of the HMA authorities.
 - xvi. SSC's Draft Plan aims to contribute 640 homes to the unmet need in the GB&BCHMA, less than 1% of the need. This is a reduction from SSC's November 2022 Draft Plan which targeted the provision of 4,000 homes and is not considered justified on the basis of the need which Marrons have identified.
 - xvii. Marrons conclude that SSC's unconstrained housing need is at least 6,552 to 7,932 dwellings over the Plan period (364 dpa to 441 dpa) to meet forecast employment growth in the Council's evidence base. The reintroduction of the 4,000 home contribution unmet need from the GB&BCHMA increases this to between 586 and 663 dpa which is considered entirely realistic on the basis of the 2021/22 and 2022/23 monitoring years achieving delivery of 530 and 622 dwellings.
-

1. INTRODUCTION AND NATIONAL PLANNING POLICY CONTEXT

- 1.1 This Housing Need Assessment of South Staffordshire has been prepared by Marrons National Socio Economics Team on behalf of Boningdale Homes.
- 1.2 The assessment is made in response to the public consultation of the South Staffordshire Council Publication Plan: A New Development Strategy for South Staffordshire 2023-2041 (Regulation 19) April 2024 (hereafter referred to as the Draft Plan).
- 1.3 The objective of the report is to determine whether unconstrained housing need in South Staffordshire has been determined by the Council in the Draft Plan's supporting evidence base, and what unconstrained housing need is for the administrative area.
- 1.4 The policy and guidance which should be considered when assessing the housing need for local authorities is set out in the December 2023 National Planning Policy Framework (NPPF) and its accompanying Planning Practice Guidance (PPG).
- 1.5 The PPG's Housing and Economic Needs Assessment (HENA) section is very clear that the assessment of housing need should be unconstrained and undertaken prior to and independently from the consideration of constraints and the determination of a housing requirement. It is therefore important that full unconstrained housing need is established before the process of determining a requirement begins.
- 1.6 In this section we summarise the policies of the NPPF and PPG which cover the assessment.

National Planning Policy Framework (NPPF, December 2023)

- 1.7 At paragraph 11, the NPPF states how *"Plans and decisions should apply a presumption in favour of sustainable development."*
- 1.8 Paragraph 11 moves on to state *"For plan-making this means that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas."* (our emphasis)
- 1.9 Furthermore paragraph 35 a) states that Local Plans are 'sound' if they are *"positively prepared"*, i.e., *"providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development."* (our emphasis)

- 1.10 These policies make it clear that meeting objectively assessed needs is the minimum expectation of a Local Plan.
- 1.11 What this means for housing need is explained in section 5 of the NPPF, 'Delivering a sufficient supply of homes'.
- 1.12 Under this heading, paragraph 60 of the NPPF states, *"The overall aim should be to meet as much of an area's identified housing need as possible, including with an appropriate mix of housing types for the local community."* (our emphasis)
- 1.13 Paragraph 61 moves on to state how the minimum number of homes needed in an area should be determined. It states *"To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance."*
- 1.14 However paragraph 61 moves on to state *"The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area. There may be exceptional circumstances, including relating to the particular demographic characteristics of an area which justify an alternative approach to assessing housing need; in which case the alternative approach should also reflect current and future demographic trends and market signals."* (our emphasis)
- 1.15 Furthermore in respect of neighbouring areas which may not be able to meet their own need, paragraph 61 states *"In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for."* (our emphasis)
- 1.16 It is therefore clear that the assessment of need in any given area should include unmet need from neighbouring local authorities if it exists.
- 1.17 The December 2023 NPPF also introduces the link between economic growth aspirations and housing need, paragraph 67 stating *"Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment."* (our emphasis)
- 1.18 This is also reflected in section 6 of the NPPF, 'Building a strong, competitive economy' and specifically in paragraph 86 c) which states that planning policies should *"seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor*

environment.”

- 1.19 These policies relating to housing need are then addressed in more detail in the ‘Housing and Economic Needs Assessment’ (HENA) section of the Planning Practice Guidance (PPG) which is discussed below.

Planning Practice Guidance (PPG)

- 1.20 The method by which housing need should be established, and an explanation of the ‘Standard Method’ (SM) referred to in the NPPF is set out in detail in the HENA section of PPG (section ID2a).
- 1.21 At the outset the PPG states, *“Housing need is an unconstrained assessment of the number of homes needed in an area”* and goes on to state *“Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from assessing land availability, establishing a housing requirement figure and preparing policies to address this such as site allocations.”*² (Our emphasis).
- 1.22 The PPG is very clear that the assessment of need should be unconstrained and is an entirely separate exercise from establishing the housing requirement.
- 1.23 The PPG then moves on to explain what the SM provides. It states *“The standard method uses a formula to identify the minimum number of homes expected to be planned for. The standard method...identifies a minimum annual housing need figure. It does not produce a housing requirement figure.”*³ (Our emphasis).
- 1.24 This section emphasises how the SM provides the minimum housing need figure and highlights how the SM does not produce a housing requirement figure. A separate part of PPG addresses housing requirement.
- 1.25 The PPG also makes a very clear distinction as to the tests which will be applied if local authorities seek to justify housing need higher or lower than the SM minimum.
- 1.26 In respect of a housing need figure lower than the standard method minimum, the PPG states *“where an alternative approach results in a lower housing need figure than that identified using the standard method, the strategic policy-making authority will need to demonstrate, using robust evidence, that*

² Paragraph ID:2a-001, PPG, 2019

³ Paragraph ID:2a-001, PPG, 2019

the figure is based on realistic assumptions of demographic growth and that there are exceptional local circumstances that justify deviating from the standard method. This will be tested at examination.”⁴ (Our emphasis).

- 1.27 In contrast, in terms of establishing housing need which is above the Standard Method, PPG states “*Where a strategic policy-making authority can show that an alternative approach identifies a need higher than using the standard method, and that it adequately reflects current and future demographic trends and market signals, the approach can be considered sound as it will have exceeded the minimum starting point.*”⁵ (Our emphasis).
- 1.28 Having established that SM represents minimum need, and that actual housing need may be higher, the PPG moves to discuss when it might be appropriate to plan for a higher housing need figure than the SM indicates.
- 1.29 PPG therefore states that “*there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.”⁶ (Our emphasis)*
- 1.30 In discussing these circumstances PPG reiterates how the standard method only represents minimum need, stating “*The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour.”⁷ (Our emphasis)*
- 1.31 The PPG then moves on to discuss what circumstances might lead to an increase in housing need, but confirms at the outset that the circumstances it refers to are not exhaustive and there may be other reasons as to why overall housing need exceeds the Standard Method’s minimum calculation:

“Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:

- **growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g., Housing Deals);**
- **strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or**

⁴ Paragraph ID:2a-015, PPG, 2019

⁵ Paragraph ID:2a-015, PPG, 2019

⁶ Paragraph ID:2a-010, PPG, 2019

⁷ Paragraph ID:2a-010, PPG, 2019

- an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;

There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities are encouraged to make as much use as possible of previously-developed or brownfield land, and therefore cities and urban centres, not only those subject to the cities and urban centres uplift may strive to plan for more homes. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests.”⁸

- 1.32 The delivery of much needed affordable housing can also have an impact on the assessment of overall need. In this respect the Planning Practice Guidance (PPG) states *“An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.”*⁹
- 1.33 The PPG also reiterates that this assessment of need is separate to the process of establishing a housing requirement, stating that the circumstances which may lead to a higher need figure *“will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan)*¹⁰ (Our emphasis).

Summary

- 1.34 Therefore, to summarise, both the NPPF and PPG emphasise that the SM determines the minimum number of homes needed for each local authority. Consideration must be given to whether other circumstances warrant an increase to the minimum need, and in this context and to comply with PPG the assessment of need must be unconstrained as explained in PPG.
- 1.35 Furthermore the PPG emphasises throughout how the assessment of need must be carried out separately and prior to the determination of a housing requirement.
- 1.36 Furthermore, the PPG refers to exceptional circumstances being required to justify housing need which is below the Standard Method minimum.
- 1.37 In contrast the PPG states how a range of circumstances may justify the determination of housing need which exceeds the SM minimum, and that an assessment of need which establishes a figure

⁸ Ibid

⁹ Paragraph ID2a:024, PPG, 2019

¹⁰ Paragraph ID:2a-010, PPG, 2019

which is higher than the SM minimum will be considered sound if it *“adequately reflects current and future demographic trends and market signals.”*

- 1.38 It is therefore important to consider whether any factors justify an increase in the SM minimum when determining housing need, particularly growth related to economic growth ambitions and unmet need from neighbouring authorities as referred to in the December 2023 NPPF.

2.0 LOCAL PLANNING POLICY

Introduction

- 2.1 The previous section of this report outlined the national policy and guidance context for determining unconstrained housing need in a local authority area.
- 2.2 This section considers how the proposed planning policies for South Staffordshire Council (WNC) set out in the Draft Plan address this national policy and guidance.
- 2.3 We therefore summarise the relevant sections of the Draft Plan below.

South Staffordshire Council Publication Plan: A New Development Strategy for South Staffordshire 2023-2041 (Regulation 19) April 2024

- 2.4 The Draft Plan being consulted on is intended to 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.
- 2.5 The introduction to the Draft Plan states *“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.”*¹¹
- 2.6 The Draft Plan’s ‘Vision and strategic objectives’ section includes ‘Strategic Objective 2’ which states how the Draft Plan will *“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.”*¹²
- 2.7 The importance of the Draft Plan assisting in meeting unmet housing need from the wider housing market area is therefore acknowledged.
- 2.8 In terms of the economy, ‘Strategic Objective 6’ states how the Draft Plan’s vision is to *“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*

¹¹ Paragraph 1.2, page 2, South Staffordshire Publication Plan (Regulation 19), April 2024

¹² Page 21, South Staffordshire Publication Plan (Regulation 19), April 2024

providing the skills to enable residents to access these jobs.”¹³

Overall Housing Need

- 2.9 The Draft Plan outlines the housing target required to achieve these objectives as follows; *“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.”¹⁴*
- 2.10 As we have referred to above, the Draft Plan identifies unmet housing needs from the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) throughout the Draft Plan, and under the ‘Cross boundary Issues and the Duty to Cooperate’ section states *“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.”¹⁵*
- 2.11 The Draft Plan targets the provision of 640 homes 2023-2041 (36 per annum) towards the GBBCHMA’s unmet housing needs.
- 2.12 Draft Policy DS4: Development Needs subsequently states at point (a) that the council will promote the delivery of a minimum of *“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.”¹⁶*
- 2.13 However this should be considered in the context of the previous Regulation 19 Publication Plan (November 2022) which planned to accommodate 4,000 dwellings of the GBBCHMA’s unmet housing needs.
- 2.14 This significant reduction is based on the Council’s decision to follow *“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.”¹⁷*

¹³ Page 22, South Staffordshire Publication Plan (Regulation 19), April 2024

¹⁴ Paragraph 5.8, page 27, South Staffordshire Publication Plan (Regulation 19), April 2024

¹⁵ Paragraph 3.6, page 11, South Staffordshire Publication Plan (Regulation 19), April 2024

¹⁶ Policy DS4(a), page 46, South Staffordshire Publication Plan (Regulation 19), April 2024

¹⁷ Paragraph 5.14, page 28, South Staffordshire Publication Plan (Regulation 19), April 2024

- 2.15 The decision of the Council to follow this approach is two-fold. The first reason is set out in the Draft Plan as follows; *“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.”*¹⁸
- 2.16 The second reason stated is *“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.”*¹⁹
- 2.17 Marrons consider an updated assessment of unmet housing need in the GBBCHMA later in this report.

Affordable Housing

- 2.18 Paragraph 7.6 of the Draft Plan states *“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.”*²⁰ (our emphasis)
- 2.19 The Draft Plan refers to the 2024 Housing Market Assessment in respect of affordable housing, but does not set out the need determined by the assessment. We therefore consider affordable housing need in more depth later in this report.

Economic Growth and Employment Need

- 2.20 Policy DS4: Development Needs also sets out the employment need which is planned for between 2023-2041 as follows; *“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.”*²¹
- 2.21 The Policy goes on to state, *“18.8ha of West Midlands Interchange will contribute towards South*

¹⁸ Paragraph 5.12, page 28, South Staffordshire Publication Plan (Regulation 19), April 2024

¹⁹ Paragraph 5.12, page 28, South Staffordshire Publication Plan (Regulation 19), April 2024

²⁰ Paragraph 7.6, page 77, South Staffordshire Publication Plan (Regulation 19), April 2024

²¹ Policy DS4(b), page 46, South Staffordshire Publication Plan (Regulation 19), April 2024

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.”²²

- 2.22 Two of the documents included in the ‘key evidence’ for employment needs are the Economic Development Needs Assessment (EDNA) update 2024 and the 2022 EDNA.
- 2.23 Furthermore, Policy EC1 ‘Sustainable Economic Growth’ confirms South Staffordshire’s commitment to the Staffordshire and Stoke Local Enterprise Partnership, listing the Staffordshire and Stoke Local Enterprise Partnership: Strategic Economic Plan (2018) as key evidence. The Policy states *“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.”²³*
- 2.24 We consider these documents in more detail in terms of the number of jobs expected to be created in South Staffordshire over the Plan period, and how the housing target proposed in the Draft Plan aligns with this employment growth.
- 2.25 This is an important consideration in the context of the NPPF stating how a lack of homes should not create a barrier to investment.

Summary

- 2.26 This section of our report has summarised the policies of the Draft Plan relating to housing need being consulted on by South Staffordshire Council as part of their Draft Plan.
- 2.27 The Draft Plan has clear priorities to address affordable housing need and provide economic growth in line with the Staffordshire and Stoke Local Enterprise Partnership.
- 2.28 The Draft Plan is underpinned by the housing need calculated using the NPPF’s standard method. This provides minimum housing need of 4,086 dpa, 2023-2041. The following sections of this report consider whether this represents fully unconstrained housing need for South Staffordshire.

²² Policy DS4(b), page 46, South Staffordshire Publication Plan (Regulation 19), April 2024

²³ Policy EC1, page 109, South Staffordshire Publication Plan (Regulation 19), April 2024

3. ECONOMIC GROWTH AND HOUSING NEED

Introduction

- 3.1 The 2023 National Planning Policy Framework (NPPF) includes a section titled ‘Building a strong, competitive economy’ which states the following in its introduction:

“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential”²⁴ (our emphasis).

- 3.2 In this context the NPPF moves on to state *“Planning policies should seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment”²⁵ (our emphasis).*
- 3.3 An unconstrained assessment of need to establish how many homes would be needed to support economic growth aspirations in South Staffordshire is therefore imperative, particularly in the context of Policy EC1 ‘Sustainable Development’ of the Draft Plan which states how the Council will *“sustain and develop the local economy of South Staffordshire and encourage opportunities for inward investment and further economic development of the district.”*
- 3.4 In this section we review the key evidence base documents identified in the Draft Plan in terms of how they address economic growth and its links to housing need.

South Staffordshire Draft Plan Evidence Base

Strategic Housing Market Assessment (SHMA) – 2022 Update and 2024 Partial Update

- 3.5 The 2022 SHMA (October 2022) was based on the previous Regulation 19 Draft Plan (November 2022) approach to delivering 4,000 dwellings 2018-2040 for unmet need in the wider Greater Birmingham and Black Country Housing Market Area (GBBCHMA), alongside the National Planning

²⁴ Paragraph 85, page 24, National Planning Policy Framework, 2023

²⁵ Paragraph 86c, page 24, National Planning Policy Framework, 2023

Policy Framework's (NPPF's) calculation of minimum housing need for South Staffordshire District (241 dpa). This led to an overall requirement of 9,330 dwellings in the District, 2018-2040 (424 dpa).

- 3.6 In terms of how this aligned with employment growth, the 2022 SHMA referred to the June 2022 Economic Development Needs Assessment (EDNA) and its forecast of 4,824 new jobs, 2020-2040.²⁶
- 3.7 The 2022 SHMA determined that the housing requirement of 9,330 dwellings 2018-2040 would generate growth of 6,618 people aged 16-64, and that 4,877 would be economically active.²⁷ Furthermore based on commuting patterns the 2022 SHMA concluded only 1,640 working age residents would be needed to fill the jobs and there would be a surplus of additional labour force locally.²⁸
- 3.8 The 2022 SHMA therefore determined that there would be no requirement to exceed 9,330 dwellings 2018-2040 to support 4,824 new jobs 2020-2040.
- 3.9 However as we have identified in the previous section of this report the 2024 Draft Plan now being consulted on is based on a housing target of 4,726 dpa, approximately half the number of dwellings proposed in the November 2022 Draft Plan.
- 3.10 The 2024 SHMA Partial Update prepared to support the 2024 Draft Plan being consulted on determines there would be an increase of only 1,012 people of working age (18-64) between 2023 and 2041. However there is no consideration of whether this will support projected job growth, based either on the previous 2022 EDNA (as done so in the 2022 SHMA), or the 2024 EDNA Update.
- 3.11 Instead the 2024 SHMA Partial Update states *“The Economic Development Needs Assessment (EDNA) undertaken for South Staffordshire indicated that the District has a very low level of self-containment and high gross commuting flows as a proportion of the workforce total, and thus a very high commuting ratio. South Staffordshire is within a Functional Economic Market Area with the four Black Country areas and so significant cross-boundary flows are to be expected. The additional working age people projected to be resident in South Staffordshire are not necessarily likely to work in the District (based on current trends). The fact that additional housing does not have a good correlation with employment within the District means that providing further additional housing to try and achieve a balance with jobs would be inappropriate and would likely perpetuate the unsustainable current commuting patterns.”*²⁹ (Our emphasis)

²⁶ Paragraph 5.9, page 61, South Staffordshire District Council Strategic Housing Market Assessment – October 2022

²⁷ Paragraphs 5.10-5.11, pages 61-62, South Staffordshire District Council Strategic Housing Market Assessment – October 2022

²⁸ Paragraph 5.12, page 62, South Staffordshire District Council Strategic Housing Market Assessment – October 2022

²⁹ Paragraphs 5.9-5.10, pages 17-18, South Staffordshire Strategic Housing Market Assessment Partial Update – February 2024

- 3.12 Marrons consider that the number of jobs which the revised Draft Plan housing requirement is likely to support should be determined, to be consistent with the 2022 SHMA's approach. Marrons provide demographic modelling which determines this later in the report. Furthermore we use the 2011 Census commuting ratio and maintain it throughout the modelling period to ensure unsustainable commuting patterns are not exacerbated. This is a common approach used by a range of consultants when undertaking modelling scenarios and we do not agree with the statement of the 2024 SHMA set out above which contradicts evidence presented only two years before in the 2022 SHMA.
- 3.13 Marrons conclude that the 2024 SHMA Update's approach to employment-led housing need means that a full unconstrained assessment of housing need has not been undertaken.

South Staffordshire Economic Development Needs Assessment (EDNA) – 2022 and 2024 Update

- 3.14 As we have set out above, the 2022 SHMA considered whether the November 2022 Draft Plan housing requirement (9,330 dwellings 2018-2040) would support forecast employment growth from the 2022 EDNA (4,824 jobs 2020-2040).
- 3.15 However the 2024 SHMA Partial Update does not replicate the approach of the 2022 equivalent as we have also set out above.
- 3.16 The 2024 EDNA Update *“updates the evidence previously published in the EDNA 2022 by presenting an up-to-date position on the employment requirements of South Staffordshire District through to 2041. This update also reviews South Staffordshire’s potential contribution towards meeting the unmet employment land needs of the Black Country authorities.”*³⁰
- 3.17 The 2024 EDNA Update provides the analysis of employment land need, 2023-2041, which is then taken forward in proposed Policy DS4: Development Needs of the Draft Plan. The 2024 EDNA concludes as follows, *“The requirement for future provision for land and floorspace should provide for minimum gross residual objectively assessed needs of 62.4ha for the period 2023-2041”*³¹ which is then repeated in Policy DS4.
- 3.18 It therefore follows that the employment growth aligned with this objectively assessed need for employment land informs an assessment of the housing need required to support the requisite labour force growth.

³⁰ Paragraph 10.1, page 98, South Staffordshire Economic Development Needs Assessment Update, March 2024

³¹ Paragraph 0.61, page 13, South Staffordshire Economic Development Needs Assessment Update, March 2024

- 3.19 The 2024 EDNA acknowledges this as follows; *“Planning Practice Guidance continues to provide a non-exhaustive list of conditions that may indicate that actual housing need is higher than the standard method indicates and can include changing economic circumstances. Ambitions for economic development that may support identification of a housing requirement in excess of the standard method are also now recognised at Paragraph 67 of the NPPF 2023. Demographically derived assessments of current and future local labour supply (labour supply techniques) therefore remain relevant to assessing the implications of alternative economic scenarios that should be considered as part of market signals that may affect the forecast of future needs.”*³²
- 3.20 In this regard the 2024 EDNA Update concludes as follows; *“South Staffordshire’s future employment land needs are based on a labour demand Growth Scenario, which was developed using the same methodology as set out in the EDNA 2022. This includes an adjustment to account for trends in ‘working from home’. The updated Growth Scenario forecast shows an increase of **5,326 net additional jobs** in South Staffordshire over to period 2020 to 2041.”*³³
- 3.21 This level of employment growth represents annual growth of 0.60% per annum 2020-2041.³⁴ In the demographic forecasting section of this report we consider what housing need is in South Staffordshire to support this level of employment growth.

Summary

- 3.22 In summary, this section has identified how the most recent evidence base document assessing housing need (the 2024 SHMA Partial Update) does not assess whether its own conclusion on housing need for South Staffordshire (4,086 dwellings 2023-2041), or the need plus provision for unmet need from the wider housing market area (4,726 dwellings 2023-2041) will support the employment growth (5,326 jobs 2020-2041) determined by the Council’s 2024 EDNA Update.
- 3.23 This is considered to be inconsistent with the 2022 SHMA Update (undertaken by the same author as the 2024 Partial Update) which did consider this issue and concluded how the significantly higher housing target proposed in the November 2023 Regulation 19 Local Plan (9,330 dwellings 2018-2040) would support the employment growth of the 2022 EDNA.
- 3.24 Marrons therefore consider this issue in the demographic forecasting section of this report.

³² Paragraph 7.7, page 64, South Staffordshire Economic Development Needs Assessment Update, March 2024

³³ Paragraph 10.2, page 98, South Staffordshire Economic Development Needs Assessment Update, March 2024

³⁴ Table 19, page 41, South Staffordshire Economic Development Needs Assessment Update, March 2024

4. AFFORDABLE HOUSING NEED

Introduction

- 4.1 Planning Practice Guidance (PPG) states that *“an increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.”* Local authorities should therefore consider if the minimum housing need calculated using the standard method should be increased to accommodate more affordable housing.
- 4.2 Affordable housing need has become acute across the country as the affordability of housing has worsened over the past two decades.
- 4.3 The January 2022 House of Lords report ‘Meeting Housing Demand’ identified *“there were 1,187,641 households on local authority housing waiting lists in 2021”* and *“as of March 2021, 95,450 families had been placed into temporary accommodation by local authorities.”*³⁵
- 4.4 Research for the National Housing Federation (NHF) and Crisis in 2018 identified a need for 145,000 new affordable homes per year, of which 90,000 for the next 15 years should be for social rent, 30,000 for affordable rent and 25,000 shared ownership homes.³⁶
- 4.5 However to put this into context, only 63,605 new affordable homes were delivered across England in the most recent year for which data is available (2022/23), approximately 27.1% of all net completions (234,397).
- 4.6 However this a gross affordable delivery figure and the Government’s statistics show a loss of 27,500 affordable dwellings in 2022/23 to demolitions and sales.
- 4.7 Net affordable completions were therefore only 36,105 (i.e., 15.4% of all net completions).
- 4.8 Furthermore the House of Lords report stated, *“There has been a steady decline in social rent as a proportion of new supply, from over 75% in 1991/92 to 11% in 2019/20. In 50 local authorities, no homes for social rent were built over the five-year period from 2015/16 to 2019/20”*³⁷ (our emphasis). There is a severe lack of local authority housing

³⁵ Paragraph 69, page 36, Meeting housing demand, House of Lords Built Environment Committee, 10 January 2022

³⁶ Professor Glen Bramley, Crisis and National Housing Federation Housing supply requirements across Great Britain (November 2018)

³⁷ Paragraph 65, page 33, Meeting housing demand, House of Lords Built Environment Committee, 10 January 2022

as this statement summarises.

4.9 The Department for Levelling Up, Housing and Communities (DLUHC) publishes data on social housing lettings in England. In its latest publication, updated on 6 March 2024, the department reported that there were 1.29 million households on local authority waiting lists as of 31 March 2023. This represented an increase of 73,000 households (6 percent) compared to 31 March 2022. It also was the highest number of households on the waiting list since 2014 when the conditions for accessing the waiting list were changed.

4.10 The NHF also undertook research in late 2023 which concluded that unless politicians commit to a long-term plan to fix the housing crisis, an extra 1.7 million households will be living in unaffordable homes by 2030 compared with 2020 - an increase of more than a third (35%).

4.11 The NHF research also found that by 2030 there will be:

- 600,000 additional households living in unaffordable private rented homes, taking the total to 2.2 million;
- 1 million additional homeowners facing unaffordable mortgage costs, taking the total to 1.9 million - more than double current levels;
- 1.5 million Families will be on the waiting list for social housing, a rise of 350,000 or almost a third (32%);
- 150,000 children will be homeless and living in emergency accommodation like B&Bs and hostels by 2030 – an increase of 20,000. This is the equivalent of six children in every school in England. ³⁸

4.12 In April 2023 the NHF also found that more than 310,000 children were sharing a bed with their parents or siblings; and the number of homeless children stuck in temporary accommodation reached 130,000 in 2023, the highest number since records began. ³⁹

4.13 In this section of the report we consider the affordable housing position in South Staffordshire.

³⁸ The housing crisis: what will happen if we don't act? NHF, August 2023

³⁹ Overcrowding in England, NHF, April 2023

Affordable Housing Need in South Staffordshire

- 4.14 At the outset, Marrons do not advocate that affordable need necessarily be met in full, given the judgment of Mr Justice Dove in the Kings Lynn case (High Court Judgment)⁴⁰, which concluded that neither the NPPF nor the PPG suggest affordable housing need must be met in full.
- 4.15 However as we have stated in the introduction to this section the need should be considered in the context of PPG which states *“An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes”*⁴¹ (our emphasis).
- 4.16 This should be considered in the context of the 2022 South Staffordshire Strategic Housing Market Assessment (SHMA) which concludes there to be a net need for 67 affordable dwellings per annum (adpa) in the District.⁴²
- 4.17 However it is important to note how the 2022 SHMA considers this to be the need based on an affordability threshold whereby 35% of gross household income is spent on rent. The 2022 SHMA reports how affordable housing need increases to 111 adpa based on a 30% affordability threshold, and 156 adpa based on 25%.⁴³
- 4.18 As Table 6.4 of the SHMA indicates however, this is based on rent payable for housing. The same table assesses need based on owner-occupation and concludes *“If it was presumed that home ownership was the market access point, then there would be a need for 304 affordable homes per year.”*⁴⁴
- 4.19 Affordable housing need is clearly considered imperative in the District, as Paragraph 7.6 of the Draft Plan states *“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*

⁴⁰ Paragraphs 34-37, pages 10-11, High Court Judgment, Borough Council of Kings Lynn and West Norfolk v Secretary of State for Communities and Local Government, ELM Park Holdings Ltd, 09 July 2015

⁴¹ Paragraph: 024 Reference ID: 2a-024-20190220

⁴² Paragraph 0.61, page 13, South Staffordshire Economic Development Needs Assessment, 2022

⁴³ Table 6.4, page 74, South Staffordshire Economic Development Needs Assessment, 2022

⁴⁴ Table 6.4 and paragraph 5.33, page 74, South Staffordshire Economic Development Needs Assessment, 2022

Past affordable housing delivery in South Staffordshire

4.20 In this section of the report we have considered affordable housing delivery against the affordable housing need set out in the 2022 SHMA.

4.21 As we have set out above the 2022 SHMA determined affordable need of between 67 and 156 adpa based on 25% - 35% affordability threshold for rent, and 304 adpa based on home ownership.

4.22 Table 4.1 sets out gross affordable housing delivery as recorded by the Department for Levelling Up, Housing & Communities (DLUHC).

Table 4.1: Gross affordable housing delivery in South Staffordshire

2011-12	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2011-12 to 2022-23 (per annum)
72	26	29	157	71	69	88	134	85	26	212	156	1,125 (94)

Source: DLUHC live table 1008c

4.23 Since 2011/12 there have been 1,125 gross affordable completions, equating to 94 adpa. The 2022 SHMA considered the 2018-2040 period, and since 2018 the gross affordable delivery has been 123 adpa.

4.24 However this is based on gross affordable delivery, and losses to affordable housing stock need to be considered to determine what the net delivery has been.

Net Affordable Housing Delivery in South Staffordshire

4.25 To determine whether net affordable delivery is lower than the proportions set out above, we have consulted the Department for Levelling Up, Housing and Communities (DLUHC) live tables on social housing sales, and specifically the 'social housing sales open data'. This data is set out in Table 4.2 below.

Table 4.2: DLUHC figures on the disposal of social housing stock in South Staffordshire

Year	Demolition	LCHO Sales	Other Sales	Other sales to sitting tenants	Right to Buy	Sales to sitting tenants	Grand Total
2011-12	0	0	0	0	0	3	3
2012-13	22	2	1	0	0	13	38
2013-14	0	2	6	0	0	13	21
2014-15	0	5	0	0	0	47	52
2015-16	42	0	4	0	0	24	70
2016-17	0	7	0	0	0	12	19
2017-18	1	3	1	0	0	6	11
2018-19	0	5	2	0	0	3	10
2019-20	9	5	0	0	0	45	59
2020-21	0	8	0	0	0	6	14
2021-22	0	4	0	0	0	6	10
2022-23	0	10	2	0	0	6	18
Total	74	51	16	0	0	184	325

Source: DLUHC live tables

4.26 Table 4.2 shows that there have been 325 losses to affordable housing stock (local authority and private registered providers) since 2011/12.

4.27 This means that despite 1,125 affordable completions in South Staffordshire since 2011/12, net affordable housing delivery has been 800 affordable dwellings (67 adpa).

4.28 Since 2018/19 net delivery has been 502 affordable dwellings (100 adpa).

4.29 It is also useful to consider what the net affordable housing delivery has been as a proportion of all net housing completions of all tenures.

4.30 This analysis shows how 800 net affordable completions represent 23.3% of net completions of all tenures between 2011/12 and 2022/23. Since 2018/19 the figure has been 26.9%.

Overall Housing Need and Affordable Housing

4.31 The analysis set out above should be considered in the context of the housing targets put forward in the Draft Plan.

4.32 As the analysis has shown, net affordable completions have been 23.3% of all delivery since 2011/2 and 26.9% since 2018/19.

4.33 If delivery were to continue at this rate, Table 4.3 illustrates unconstrained housing need based on delivering affordable need in full based on the need identified against the 25% to 35% affordability thresholds in the 2022 SHMA.

Table 4.3: Overall housing need in South Staffordshire to meet affordable housing need based on past provision

Affordable Need based on affordability threshold of rent paid	Overall Housing Need required to meet affordable need in full (dwelling per annum)
67 adpa (35% affordability threshold)	249 – 288
111 adpa (30% affordability threshold)	413 – 476
156 adpa (25% affordability threshold)	580 – 670
Market entry based on owner-occupation	
304 adpa	1,130 – 1,305

4.34 As Table 4.3 illustrates, the overall housing need determined solely for South Staffordshire District (227 dwellings per annum) would not deliver affordable housing need in full whichever assumptions are assumed.

4.35 This is particularly the case if an affordability threshold of 30% is considered appropriate in South Staffordshire, as overall housing need would be between 413 and 476 dpa.

4.36 Need based on a 25% threshold and owner-occupation would result in further increases in overall housing need.

4.37 In the context of Planning Practice Guidance which states how “An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes”⁴⁵ it is considered that South Staffordshire should consider whether the housing *requirement* can be increased beyond the standard method minimum assessment of need to deliver more affordable housing which is clearly in need and which the Draft Plan lists as a priority over the Plan period.

Numbers of households on waiting lists

4.38 The number of households on local authority waiting lists can also provide context for the affordable need in an area, and we present the data for South Staffordshire in Table 4.4.

Table 4.4: South Staffordshire housing waiting list

2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
541	725	634	653	614	745	621	667	1,029	936

Source: DLUHC, Live Table 600

⁴⁵ Paragraph: 024 Reference ID: 2a-024-20190220

4.39 As Table 4.4 illustrates, the number of households on the Council's housing register has increased quite considerably since changes to waiting list criteria changed in 2013. As 2014 there were 541 households on the register but this increased by 90% to 1,029 households in 2022.

4.40 There has been some improvement in the most recent 12-month period, with a reduction to 936 households. However this remains a 73% increase since 2014 and emphasises how the affordability of the District has deteriorated during the recent past.

Homelessness

4.41 In respect of homelessness, Table 4.5 sets out the data collected by DLUHC for the last five financial years for which data is available.

Table 4.5: Homelessness in South Staffordshire, 2019/19 to 2021/22

Year	Number of households assessed	Total households owed a duty	Threatened with homelessness - Prevention duty owed	Homeless - Relief duty owed
2022/23	123	123	61	62
2021/22	55	55	39	16
2020/21	77	76	42	34
2019/20	128	128	94	34
2018/19	128	122	91	31

Source: DLUHC

4.42 Table 4.5 shows how the number of households assessed for homelessness and whether they are owed a prevention or relief duty had fallen quite significantly from 2019/20 to 2021/22.

4.43 However, 2022/23 has recorded the second highest number of households assessed, as well as the second highest being owed a duty.

4.44 Of those households owed a duty, 2022/23 has seen by far the highest number of households (62) who have been assessed and are homeless, double the figure of 2018/19.

Affordable Housing Summary

4.45 In summary, the key points to note from our analysis are as follows:

- The Draft Plan states *Increasing the provision of affordable housing is a key priority of the council;*
- The Council's 2022 SHMA determined affordable need to be 67 adpa (35%

affordability threshold), 111 adpa (30% threshold), and 156 adpa (25% threshold);

- Affordable need would 304 adpa if home ownership was the market access point;
- There has been net delivery of 800 affordable dwellings 2011/12 to 2022/23, or 502 since the start of the 2022 SHMA's housing need assessment period (2018-2040) which was based on the November 2022 Regulation 19 Draft Plan period;
- Net affordable completions account for 23.3% % of all net housing completions 2011/12 to 2022/23 and 26.9% 2018/19 to 2022/23;
- Continuing net affordable delivery at these rates would require overall housing need which exceeds the overall housing need for South Staffordshire (227 dpa) determined by the 2024 SHMA Partial Update;
- The housing waiting list has increased by 73% since 2014 to 936 households;
- The most recent year (2022/23) recorded the highest number of households owed a relief duty for homelessness.

4.46 This section has highlighted how overall housing need would have to be increased to deliver affordable housing need in full, particularly if an affordability threshold of less than 35% were to be applied.

4.47 As we have set out at the beginning of this section we do not advocate that the housing *requirement* be increased to unrealistic levels to meet affordable housing need in full.

4.48 However the evidence in this section suggests that unconstrained housing need (as required by PPG) exceeds the standard method minimum need being taken forward in the Draft Plan as a housing requirement.

4.49 This should also be considered in the context of the Draft Plan which lists affordable housing delivery as a key priority of the Council.

5. AFFORDABILITY ANALYSIS

- 5.1 As the January 2022 House of Lords report ‘Meeting Housing Demand’ states *“Affordability has worsened dramatically over the past 20 years: in England the ratio of median house prices to median earnings has almost doubled while in London it has more than doubled”*⁴⁶ (our emphasis).
- 5.2 In 1997, the median full-time worker in England could expect to pay about 3.5 times their annual earnings to buy a home; this had more than doubled by 2020 to 7.7. Homes in the private rented sector have become increasingly unaffordable. In 1980, the average working-age family renting privately spent 12% of its income on housing; in 2020 it spent almost three times this proportion (32%).⁴⁷
- 5.3 This trend has resulted in worsening living conditions and increases in overcrowding and the number of concealed households (where two or more households are living together) across the country.
- 5.4 Various actions are required to improve affordability, not least boosting supply across the country. The House of Lords report includes a statement from the UK Collaborative Centre for Housing Evidence which said *“It is certainly the case that large, sustained increases in housing supply are necessary if the objective is to improve affordability ... But, even then, it is most unlikely that increases in supply alone could bring house price to earnings ratios even close to a value of 4.0.”*⁴⁸
- 5.5 Furthermore, the National Planning Policy Framework’s (NPPF) standard method for calculating minimum housing need is set in the context of Government’s ambition to build 300,000 homes per annum by the mid-2020s. However, the House of Lords report includes evidence from Professor Glen Bramley. Professor Bramley’s analysis concludes that 340,000 homes per annum would be required to address *“future household projections, backlog of housing need and scale of homelessness.”*⁴⁹ This indicates a significant increase in need from that determined nationally under the standard method.
- 5.6 Below we consider the affordability position in South Staffordshire.

⁴⁶ Paragraph 1, page 11, Meeting housing demand, House of Lords Built Environment Committee, 10 January 2022

⁴⁷ Paragraph 52, page 29, Meeting housing demand, House of Lords Built Environment Committee, 10 January 2022

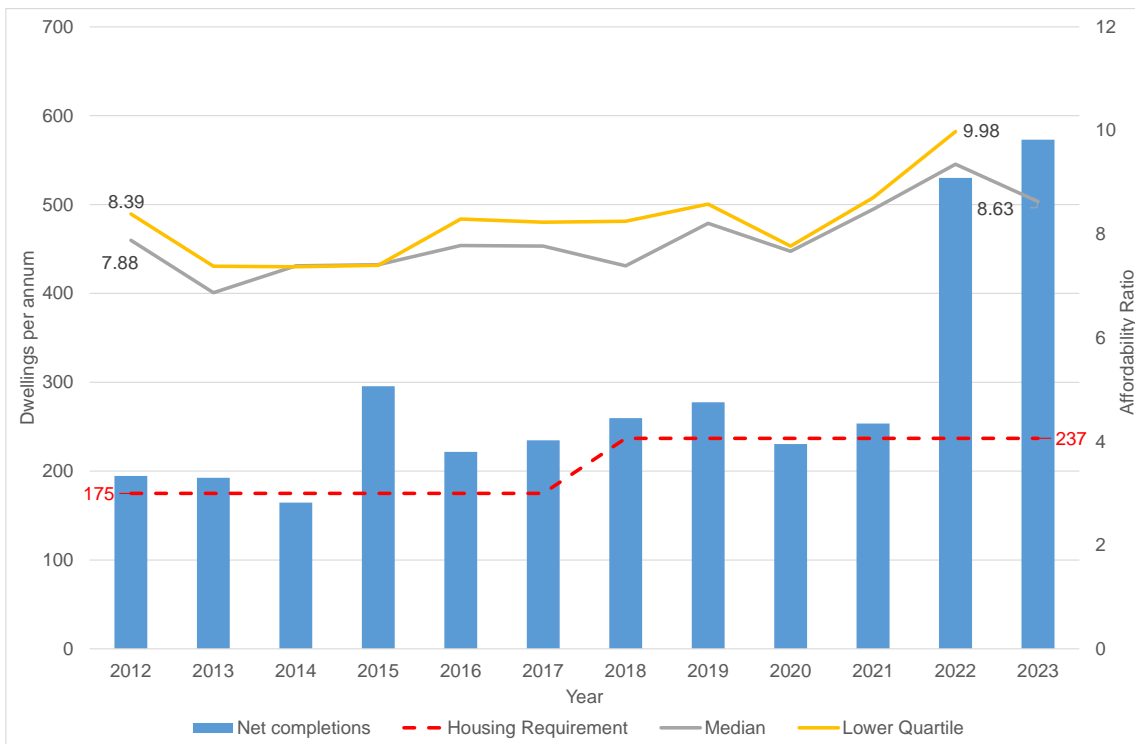
⁴⁸ Paragraph 31, page 20, Meeting housing demand, House of Lords Built Environment Committee, 10 January 2022

⁴⁹ Paragraph 30, page 19, Meeting housing demand, House of Lords Built Environment Committee, 10 January 2022

Housing delivery and affordability

- 5.7 The correlation between net completions and the affordability of housing in South Staffordshire reveals an important pattern, which is summarised below.
- 5.8 The lower quartile and median affordability ratios are published every 12 months by the Office for National Statistics (ONS) and the median ratio is used to calculate the National Planning Policy Framework's (NPPF) standard method of minimum housing need.
- 5.9 Figure 5.1 presents the change in the lower quartile and median affordability ratios for South Staffordshire since 2011/12, against the housing requirement of the adopted South Staffordshire Core Strategy (up to 2017) and the NPPF's standard method for calculating minimum housing need (2018 onwards). Net overall housing completions are also included to measure performance against the requirement/need.

Figure 5.1: Median affordability ratio and housing completions in South Staffordshire



Sources: ONS, South Staffordshire Annual Monitoring Reports

- 5.10 Figure 5.1 illustrates how the median affordability ratio has risen from 7.88 in 2012 to 8.63 in 2023 (10% increase), whereas the lower quartile affordability ratio has risen from 8.39 to 9.98 over the same period (19% increase).
- 5.11 These increases have occurred despite the Council's delivery remaining marginally ahead of the requirement/need up to 2021, and significantly exceeding need in 2022

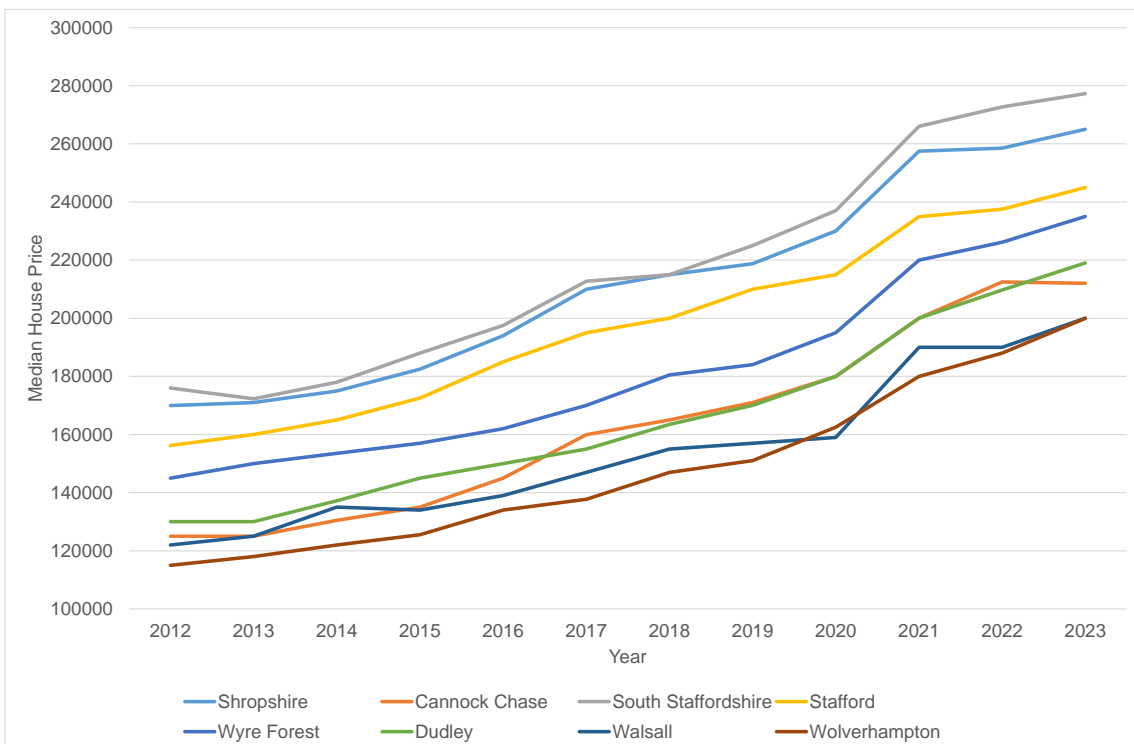
and 2023.

- 5.12 This indicates that this excess delivery above and beyond the need/requirement has failed to alleviate affordability issues in the District. Indeed, the 19% increase in the lower quartile ratio means South Staffordshire has experienced the 14th highest increase of 30 local authorities in the West Midlands.
- 5.13 The 2022 lower quartile ratio of 9.98 was the 4th highest ratio of the 30 authorities in the West Midlands, and significantly higher than the West Midlands average (7.05) and the England average (7.37).
- 5.14 The lower quartile ratio concerns those properties which are the most reasonable. The fact that residents on a lower quartile income would need 9.98x their income to afford a lower quartile priced home emphasises the affordability challenges faced by those who are most vulnerable in South Staffordshire.

House Prices in South Staffordshire

- 5.15 The increase in house prices across the country over the recent past has been significant. South Staffordshire has experienced a 51% increase in median house prices since 2011/12. We have compared this with the figures for the other authorities which share a boundary with South Staffordshire (see Figure 5.2).

Figure 5.2: Median House Price Change 2012-2023



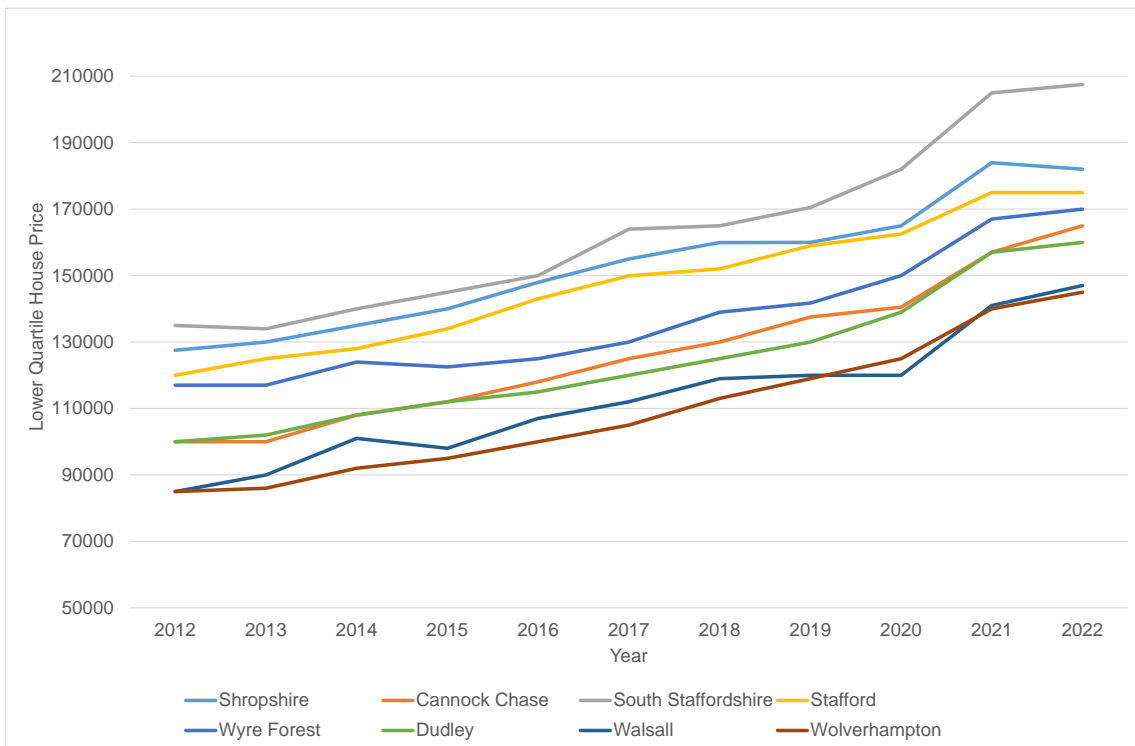
Source: ONS 2023 Median Affordability Ratios, 25 March 2024

5.16 This analysis shows how the increase of 58% in South Staffordshire has been higher than Shropshire (56%) and Stafford (57%), but lower than Cannock Chase (70%), Wyre Forest (62%), Dudley (68%), Walsall (64%), and Wolverhampton (74%) albeit some of these are broadly comparable with South Staffordshire.

5.17 However as of 2023 South Staffordshire's median house price is the highest of all eight local authorities at £277,250 and the only authority to have experienced an increase of £100,000 or more since 2012.

5.18 Table 5.3 (below) presents the lower quartile house price change over the 2012-2022 period (2023 is not yet available).

Figure 5.3: Lower Quartile House Price Change 2012-2022



Source: ONS 2022 Lower Quartile Affordability Ratios, March 2023

5.19 This analysis shows how the increase of 54% in South Staffordshire has been higher than Shropshire (43%), Stafford (46%), and Wyre Forest (45%), but lower than Cannock Chase (65%), Dudley (60%), Walsall (73%), and Wolverhampton (71%).

5.20 However similarly to the median house price, South Staffordshire's lower quartile house price is the highest as of 2022 at £207,500, and also experienced the highest absolute increase (£72,500) over the period analysed.

Summary

5.21 In summary the key points to note from this section are as follows:

- The lower quartile affordability ratio has risen in excess of the West Midlands average since 2012, and is the 4th highest in the West Midlands as of 2022;
- The median and lower quartile affordability ratios have risen over the 2012-2023 and 2012-2022 periods despite housing delivery exceeding Plan/need targets over the same period;
- Median and lower quartile house prices are higher in South Staffordshire than in any of the seven neighbouring authorities;
- The increase in lower quartile house price has exceeded £100,000 in South Staffordshire 2012-2022; the only authority of the eight analysed to increase by this much;
- South Staffordshire's median and lower quartile house prices are the highest of those eight authorities analysed.

5.22 This analysis shows South Staffordshire has acute affordability issues indicating a need for new housing to drive down prices and make housing more affordable for all. This is particularly acute in the lower quartile house price banding, those market properties which are supposed to be the cheapest and most accessible to prospective buyers.

6. DEMOGRAPHIC FORECASTING SCENARIOS

Introduction

- 6.1 As we have set out in the previous section of this report, Marrons consider that further demographic forecasting scenarios are required to provide an assessment of all possible scenarios of unconstrained housing need for South Staffordshire.
- 6.2 The Planning Practice Guidance (PPG) is clear that the assessment of need must be unconstrained and that unconstrained *need* must be determined before and separately from constraints then being considered to arrive at a housing *requirement*.
- 6.3 This section therefore sets out our approach to demographic modelling and the assumptions we have used.

PopGroup Demographic Forecasting Model

- 6.4 Marrons have used the PopGroup demographic forecasting model to undertake a number of scenarios for growth in South Staffordshire. This includes using a number of assumptions as set out below:
- Migration, fertility, and mortality rates from the 2018-based ONS SNPP principal projection;
 - A population base year of the 2022-based ONS Mid-Year Population Estimates;
 - Office for Budget Responsibility (OBR) economic activity rate projections (2018-based);
 - 2011 Census commuting ratio (in line with the 2024 EDNA Update which states how the 2021 data is too volatile owing to the Covid-19 pandemic's influence on working practices);
 - Unemployment (2.9%) taken from the Council's 2024 South Staffordshire Economic Development Needs Assessment (EDNA) Update;
 - Double jobbing (5%) taken from the Council's 2024 EDNA Update.
- 6.5 Notwithstanding the Draft Plan period starting in 2023, we have used 2020 as the base year of our modelling scenarios due to 2020 being the year from which employment growth is forecast in the 2024 EDNA Update. This also provides us with the same starting population for our scenarios.
- 6.6 Household Formation Rates (HFRs) also have to be added into the model by gender and five-year age group. The household formation rates published since the 2008-based

series are widely regarded to build in suppression in household formation in younger age groups due to worsening affordability since 2001.

6.7 In this context we have used the following approaches to household formation rates in our modelling scenarios.

1. **2014 HFRs all ages** – no adjustment to the HFRs used in the NPPF’s standard method, i.e. with suppression built in;
2. **2014 HFRs (50% return)** – 50% return to 2008-based HFRs over a 10-year period from 2023 in the 25-44 age groups. All other age groups as published in the 2014 HFRs;
3. **2014 HFRs (constant)** – where the projected HFRs decline from 2023 onwards in the 25-44 age groups, we have kept them constant at 2023 levels;
4. **2014 HFRs (return to 2001 rates)** – in this scenario we have returned the HFRs to 2001 levels (i.e., before the affordability of housing began to deteriorate rapidly) over a 10-year period in the 25-44 age group starting in 2023. We note how the 2024 SHMA Partial Update uses a similar approach in disaggregating the housing need to housing types.⁵⁰

Scenarios tested

6.8 In the context of previous analysis set out in this report, our scenarios test what housing need might be for South Staffordshire based on two different economic growth scenarios as follows:

1. **Dwelling-led scenario:** based on the 2024 Draft Plan’s housing requirement for South Staffordshire, i.e., 4,086 dwellings 2023-2041 (227 dwellings per annum). Mid-year population estimates recorded by the Office for National Statistics are used for 2020, 2021, and 2022 before the model is constrained to 227 dpa;
2. **Employment-led scenario:** based on growth of 5,326 net additional jobs as set out in the 2024 EDNA Update, adjusted for 5% double jobbing to 5,060 net additional jobs (241 jobs per annum).

⁵⁰ Page 16, Strategic Housing Market Assessment Partial Update – February 2024

Scenario results

6.9 The results of our scenarios are summarised in Tables 6.1 and 6.2 below:

Table 6.1: PopGroup scenario results – Dwelling-led (227 dpa 2023-2041)

Household Formation sensitivity	Population Growth (per annum)	Jobs Supported (per annum)
2014 HFRs all ages	8,897 (494)	2,650 (147)
2014 HFRs constant	7,887 (438)	2,283 (127)
2014 HFRs 50% return	7,057 (392)	1,994 (111)
2014 HFRs 2001 return	4,042 (225)	920 (51)

Table 6.2: PopGroup scenario results – Economic-led (5,326 jobs 2020-2041)

Household Formation sensitivity	Population Growth (per annum)	Housing Need (per annum)
2014 HFRs all ages	13,143 (730)	5,753 (320)
2014 HFRs constant		6,177 (343)
2014 HFRs 50% return		6,552 (364)
2014 HFRs 2001 return		7,932 (441)

6.10 Table 6.1 illustrates how the housing need determined by the Council for South Staffordshire (4,086 dwellings 2023-2041) would fail to support the 2024 EDNA's conclusion of future employment growth in the District (5,326 jobs 2020-2041, or 227 jobs per annum 2023-2041).

6.11 Furthermore the highest level of employment growth supported by the Council's assessment of need (147 jobs per annum 2023-2041) is predicated on the application of 2014 household formation rates which are accepted to build in household formation suppression in the 25-44 age group.

6.12 Assuming some recovery in household formation in the 25-44 age group would support less job growth (as low as 51 jobs per annum 2023-2041).

- 6.13 Table 6.2 illustrates how housing need would increase to a minimum of 5,753 dwellings, 2023-2041 (320 per annum) to support the 2024 EDNA job growth, albeit this would assume continued household formation suppression in the 25-44 age group.
- 6.14 The second scenario in Table 6.2 assumes that household formation will remain at the suppressed 2014-based rates in 2023 but won't deteriorate any further in the 25-44 age group. This would lead to higher need of 6,177 dwellings (343 per annum).
- 6.15 However some recovery in household formation in the latter two scenarios of Table 6.2 show there would be need of between 6,552 (364 per annum) and 7,932 (441 per annum) dwellings 2023-2041.

Evaluation of the results

- 6.16 Paragraph 67 of the National Planning Policy Framework (NPPF, December 2023) states *“Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment.”* (our emphasis)
- 6.17 As we have summarised earlier in this report, strategic objective 6 of the Draft Plan is to *“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”*⁵¹ and support the aspirations of the Staffordshire and Stoke Local Enterprise Partnership.
- 6.18 In this context Marrons view is that housing need is between 5,753 and 7,932 dwellings 2023-2041 in order to support the Council's own forecast of employment growth (227 jobs per annum). Assuming some recovery in household formation reduces this range to between 6,552 (364 per annum) and 7,932 (441 per annum) dwellings 2023-2041.
- 6.19 To support this further, the Housing and Economic Development Needs Assessment (HEDNA) section of Planning Practice Guidance (PPG) sets out circumstances where housing need might exceed the standard method minimum.

⁵¹ Page 22, South Staffordshire Publication Plan (Regulation 19), April 2024

- 6.20 Amongst other reasons as to why it may be higher than the minimum, PPG states one reason could be where “*growth strategies for the area are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals)*”.⁵²
- 6.21 The PPG also states “*There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests.*”⁵³ (our emphasis)
- 6.22 In this context, net housing delivery across South Staffordshire was 622 in 2022/23 and 530 dwellings in 2021/22. This illustrates how the economic-led need we have determined in this section of our report is entirely realistic for the Council to deliver.
- 6.23 In this context Marrons view is that housing need is between 6,552 (364 per annum) and 7,932 (441 per annum) dwellings 2023-2041 to support forecast job growth whilst addressing household formation suppression.

⁵² Paragraph: 010 Reference ID: 2a-010-20201216, Planning Practice Guidance, 16 December 2020

⁵³ Paragraph: 010 Reference ID: 2a-010-20201216, Planning Practice Guidance, 16 December 2020

7. UNMET HOUSING NEED IN THE GREATER BIRMINGHAM AND BLACK COUNTRY HOUSING MARKET AREA

- 7.1 Unmet housing need from the Greater Birmingham and Black Country Housing Market Area (GB&BCHMA) and how it may be delivered has been an ongoing issue for several years now, and it remains pertinent now.
- 7.2 It has long been established that Birmingham City Council (BCC) and the Black Country authorities have been unable to meet their housing needs due to restrictive amounts of land in their mainly urban boundaries, and that surrounding local authorities would need to collaborate to deliver these unmet needs.
- 7.3 South Staffordshire Council (SSC) is part of the GB&BCHMA and acknowledges its role in delivering some of the unmet need. The Regulation 19 Draft Local Plan currently being consulted on therefore commits to delivering 640 dwellings of the HMA's unmet need. This is a reduction from a contribution of 4,000 dwellings in previous iterations of the emerging Local Plan.
- 7.4 In this section we consider what the unmet need for the HMA currently is, and whether this indicates that SSC should be planning to deliver more than the 640 dwellings indicated in the Draft Plan.

South Staffordshire's proposed contribution to the GB&BCHMA's unmet need

- 7.5 The November 2022 iteration of the SSC Draft Plan proposed the delivery of 4,000 dwellings towards the GB&BCHMA's unmet housing need. This has been significantly reduced to 640 dwellings in the 2024 Draft Plan being consulted on.
- 7.6 The Council's reasoning for this is two-fold as follows:
1. *"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."*
 2. *"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.”⁵⁴

7.7 The Council have therefore applied a strategic approach listed as follows in their ‘Spatial Housing Strategy Topic Paper’ (April 2024):

- Meet the District’s own housing needs only, through sustainable non-Green Belt development and limited Green Belt development only to meet existing critical infrastructure needs;
- Meet the District’s own needs and provide a limited contribution towards the unmet needs of the GBBCHMA, through sustainable non-Green Belt development and limited Green Belt development in Tier 1 settlements well-served by public transport.⁵⁵

7.8 The Council therefore describe the approach as follows: *“the overall level of growth is determined by the capacity of the suitable sites that align with the strategic approaches outlined.”⁵⁶*

The extent of unmet housing need in the GB&BCHMA

7.9 When the BCC Local Plan was adopted in 2017, it stated that its unmet housing need equated to 37,900 homes between 2011 and 2031. In late 2022 BCC formally commenced the review of its plan and estimated a shortfall of 78,415 homes (2022-2042) in its Issues and Options document based on the Standard Method calculation of minimum housing need.

7.10 Furthermore, although progress on a joint Local Plan for the Black Country local authorities has now ceased, a Regulation 18 Draft Black Country Plan (2021) estimated a shortfall of 28,239 homes (2018-2039) based on the Standard Method’s minimum housing need.

7.11 This indicates an unmet need of 106,654 dwellings in the HMA before contributions of other local authorities are taken account of. This means that SSC’s contribution is now only 0.6% of the unmet need.

7.12 The most recent ‘*Greater Birmingham and Black Country Housing Market Area (GB&BCHMA) Position Statement Addendum, April 2023*’ stated that contributions from HMA authorities amount to 18,181 dwellings in total. This leaves a significant shortfall

⁵⁴ Paragraph 5.12, page 28, South Staffordshire Publication Plan, April 2024

⁵⁵ Paragraph 2.6, Spatial Housing Strategy Topic Paper, April 2024

⁵⁶ Paragraph 2.7, Spatial Housing Strategy Topic Paper, April 2024

of nearly 90,000 dwellings in unmet need up to circa 2040 in the HMA which the HMA local authorities should be helping to deliver.

7.13 In the context of the above, Marrons have undertaken their own analysis of unmet need for the 2020-2031 and 2031-2042 periods, as set out in Tables 7.1 and 7.2 below.

7.14 Our approach is based on a pro-rata calculation of the provision which the GB&BCHMA authorities plan to provide for the unmet need identified by Birmingham City Council and the Black Country authorities, over the respective local authorities Plan periods.

7.15 For example South Staffordshire intend to provide 640 dwellings towards the unmet need. Their proposed Plan period is 18 years, so $640/18=36$ dwellings per annum. The Plan starts in 2023, and 2023-2031 is 8 years, so $36 \times 8=288$ dwellings towards the unmet need up to 2031.

Table 7.1: Unmet need in the Greater Birmingham and Black Country Housing Market Area to 2031

GB&BCHMA Local authorities	Plan period	Standard Method Need per annum	Local Plan Housing Requirement/ Capacity per annum	Total unmet housing need over Plan period	Pro rata unmet need to 2031	Pro rata delivery of unmet need to 2031	Remaining unmet Need to 2031
Birmingham	2020-2042	7,174	3,221	-86,966	43,483	-	
Bromsgrove	2023-2040	386	398	-	-	-	
Cannock	2018-2040	248	287	-	-	295	
Lichfield	2018-2040	289	319	-	-	1,575	
Redditch	2011-2030	143	337	-	-	-	
Solihull	2020-2036	866	938	-	-	1,447	
Tamworth	2022-2043	123	141	-	-	-	
North Warwickshire	2014-2033	163	436	-	-	4,009	
Stratford-on-Avon	2011-2031	553	730	-	-	3,250	
Dudley	2023-2041	657	604	-954	479	-	
Sandwell	2022-2041	1,550	588	-18,278	8,373	-	
Walsall	n/a	906	907	-	-	-	
Wolverhampton	2022-2042	1,096	486	-12,200	5,395	-	
South Staffs	2023-2041	227	263	-	-	288	
OTHER AUTHORITIES							
Shropshire	2018-2036	n/a	n/a	n/a	-	1,083	
TOTAL		14,381	9,655	118,398	58,055	11,947	46,108

N.B. Lichfield Borough Council's contribution is under review through their emerging Local Plan. In the event that their contribution is removed the remaining unmet need would increase to 47,683 dwellings to 2031.

7.16 Table 7.1 illustrates how there would be a remaining unmet need of 46,108 dwellings in the GB&BCHMA up to 2031 if the local authorities planning to deliver some of the GB&BCHMA's unmet need do so on a pro rata basis.

7.17 Table 7.2 takes the same approach as Table 7.1 but looks further forward from 2031 to 2042, this being the final year of the emerging Birmingham Local Plan.

Table 5.2: Unmet need in the Greater Birmingham and Black Country Housing Market Area 2031-2042

GB&BCHMA Local authorities	Plan period	Standard Method Need per annum	Local Plan Housing Requirement/ Capacity per annum	Total unmet housing need over Plan period	Pro rata unmet need to 2031	Pro rata delivery of unmet need to 2031	Remaining unmet Need 2031-2042
Birmingham	2020-2042	7,070	3,221	-86,966	41,789	-	
Bromsgrove	2023-2040	398	398	-	-	-	
Cannock	2018-2040	252	287	-	-	207	
Lichfield	2018-2040	310	319	-	-	1,385	
Redditch	2011-2030	149	337	-	-	-	
Solihull	2020-2036	797	938	-	-	658	
Tamworth	2022-2043	122	141	-	-	-	
North Warwickshire	2014-2033	165	436	-	-	464	
Stratford-on-Avon	2011-2031	555	730	-	-	-	
Dudley	2023-2041	652	604	-954	599	-	
Sandwell	2022-2041	1,566	588	-18,278	10,233	-	
Walsall	n/a	907	907	-	-	-	
Wolverhampton	2022-2042	1,083	486	-12,200	6,593	-	
South Staffs	2022-2039	227	535	-	-	356	
OTHER AUTHORITIES							
Shropshire	2018-2036	n/a	n/a	n/a	-	417	
TOTAL		14,253	9,020	118,398	59,123	3,487	55,636

N.B. Lichfield Borough Council's contribution is under review through their emerging Local Plan. In the event that their contribution is removed the remaining unmet need would increase to 57,021 dwellings 2031-2042.

7.18 Our calculations in Table 7.2 indicate that at present, there would be an unmet need of 55,636 dwellings, 2031-2042.

7.19 This means that between 2020 and 2042 we have calculated there to be outstanding unmet need of 101,744 dwellings in the GB&BCHMA after the provision in emerging and existing Local Plans are taken account of.

7.20 As a constituent member of the GB&BCHMA it is questionable as to whether the 640 dwellings to meet unmet need proposed by SSC is adequate in the context of outstanding unmet need being circa 100,000 homes over the next 20 years.

7.21 In this context the Spatial Housing Strategy Topic Paper (April 2024) prepared to support the 2024 Draft Plan includes nine spatial housing strategies including the delivery of either 640 dwellings, 2,398 dwellings, or 4,000 dwellings as a contribution to the GB&BCHMA's unmet housing need. The analysis set out in this section justifies the provision of at least 4,000 dwellings to the unmet need, which would represent 3.9%

of all unmet need to 2031. At present the proposed contribution would represent 0.6% of the unmet need.

Summary

- 7.22 In summary, SSC has a responsibility to assist in addressing significant unmet housing need from the GB&BCHMA alongside the other local authorities of the HMA and this should come into the consideration of unconstrained housing need in line with PPG.
- 7.23 It is questionable whether a contribution of 640 dwellings to the significant unmet need we have identified is satisfactory. As we have summarised, we consider the outstanding unmet need beyond the provision of existing/emerging Local Plans is approximately 101,000 homes over 22 years although this will increase further if Lichfield Council remove their contribution through their emerging Plan.
- 7.24 The contribution of 4,000 dwellings set out in the November 2022 Draft Plan for South Staffordshire remains justified and Marrons consider this should be the minimum contribution considered.
- 7.25 A housing need formed of a 4,000 dwelling contribution to the GB&BCHMA, plus the 6,552 to 7,932 dwellings Marrons have determined to constitute economic-led housing need would equate to between 586 and 663 dwellings per annum over the Plan period.
- 7.26 This is considered realistic in the context of the Council delivering 622 net completions in 2022/23.

8. SUMMARY AND CONCLUSIONS

- 8.1 This report has considered the assessment of unconstrained housing need for South Staffordshire Council, in the context of Planning Practice Guidance (PPG) which states how the assessment of housing need should be unconstrained and could exceed the National Planning Policy Framework's (NPPF) standard method calculation of minimum housing need for a variety of reasons.
- 8.2 The assessment of housing need has been prepared to support representations to the South Staffordshire Council Publication Plan: A New Development Strategy for South Staffordshire 2023-2041 (Regulation 19) April 2024 (hereafter referred to as the Draft Plan).
- 8.3 The Draft Plan carries forward the Council's Strategic Housing Market Assessment Partial Update's (February 2024 SHMA) conclusion that housing need is 4,086 dwellings 2023-2041 for South Staffordshire, into the housing requirement of the Draft Plan. In addition the Draft Plan allocates an additional 640 dwellings for unmet housing need from the Greater Birmingham & Black Country Housing Market Area (GB&BCHMA).

Housing need and employment growth

- 8.4 Marrons analysis shows there to be a higher level of housing need in South Staffordshire if homes and jobs are to balance.
- 8.5 The Council's South Staffordshire Economic Development Needs Assessment Update (March 2024) forecasts an increase of 5,326 new jobs 2020-2041. However the February 2024 SHMA does not determine how many homes would be required to support this job growth, despite doing so in the 2022 SHMA which underpinned the 2022 version of the Draft Plan.
- 8.6 Marrons have therefore used demographic forecasting software to determine that the housing need determined by the Council (4,086 dwellings 2023-2041) will only serve to support between 51 and 111 jobs 2023-2041. This is based on some recovery to household formation suppression over the next decade.
- 8.7 Having established the Council's housing need will not support the Council's forecast job growth, we have determined there to be a need for between 364 and 441 dwellings per annum (dpa) to do so. This also assumes some recovery from suppressed household formation.

- 8.8 In the context of the Council delivering 530 and 622 net dpa in the past two monitoring years we consider this to be realistic.

Affordable housing need

- 8.8 The Draft Plan states that *“Increasing the provision of affordable housing is a key priority of the council”*.
- 8.9 The Council's 2022 SHMA determined affordable need to be 67 affordable dpa (adpa, 35% affordability threshold), 111 adpa (30% threshold), and 156 adpa (25% threshold). It also determined that affordable need would be 304 dpa if home ownership was the market access point.
- 8.10 There has been net delivery of 800 affordable dwellings 2011/12 to 2022/23, or 502 since the start of the 2022 SHMA's housing need assessment period (2018-2040) which was based on the November 2022 Regulation 19 Draft Plan period.
- 8.11 Net affordable completions therefore account for 23.3% % of all net housing completions 2011/12 to 2022/23 and 26.9% 2018/19 to 2022/23. Continuing net affordable delivery at these rates would require overall housing need which exceeds the overall housing need for South Staffordshire (227 dpa) determined by the 2024 SHMA Partial Update if affordable need were to be met in full.
- 8.12 The need for affordable housing is emphasised by the housing waiting list which has increased by 73% since 2014 to 936 households. In addition the most recent year (2022/23) recorded the highest number of households owed a relief duty for homelessness.
- 8.13 The PPG states *“an increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes”* and in the context of need and delivery set out above the Council should explore all options to deliver more than the standard method minimum it is promoting through the Draft Plan in order to deliver much needed affordable housing.

Market signals (affordability)

- 8.14 The affordability situation in South Staffordshire excludes many people from accessing the housing market, leading to the demand for affordable housing summarised above.
- 8.15 This is perhaps best represented by the lower quartile affordability ratio which has risen in excess of the West Midlands average since 2012, and is the 4th highest ratio of 30 local authorities in the West Midlands as of 2022. This means the most reasonable of

market housing is particularly unaffordable in South Staffordshire compared with other authorities in the region.

- 8.16 It is important to note how the median and lower quartile affordability ratios have risen over the 2012-2023 (median) and 2012-2022 (lower quartile) periods despite housing delivery exceeding Plan/need targets over the same period.
- 8.17 In the context of authorities with which it shares a boundary with, median and lower quartile house prices are higher in South Staffordshire than in any of the seven neighbouring authorities. Furthermore the increase in lower quartile house price has exceeded £100,000 in South Staffordshire 2012-2022; the only authority of the eight analysed to increase by this much. In addition South Staffordshire's median and lower quartile house prices are the highest of those eight authorities analysed.

Unmet need in the Greater Birmingham and Black Country Housing Market Area

- 8.18 Our analysis shows there to be an outstanding need of over 100,000 homes in the Greater Birmingham & Black Country Housing Market Area (GB&BCHMA) against minimum housing need, notwithstanding what is allocated by the HMA authorities to contribute to the unmet need.
- 8.19 South Staffordshire's decision to reduce their contribution to unmet need from 4,000 dwellings to only 640 dwellings is not considered to be justified on this basis.

Overall conclusions and way forward

- 8.20 Marrons consider that the evidence set out in this report provides robust analysis showing that unconstrained housing need in South Staffordshire exceeds the NPPF's standard method minimum.
- 8.21 Marrons conclude that unconstrained housing need for South Staffordshire is at least 6,552 to 7,932 dwellings over the Plan period (364 dpa to 441 dpa) to meet forecast employment growth in the Council's evidence base.
- 8.22 This is considered entirely realistic in the context of 530 and 622 net dwelling completions in the past two monitoring years.
- 8.23 An allowance for unmet need from the GB&BCHMA should also be added, and the analysis we have provided of the extent of unmet need indicates that the previous draft Plan allocation of 4,000 homes to this unmet need is justified. This would increase overall need to between 586 and 663 dpa which remains realistic in the context of the net completions previously referred to.

Contact Details

Enquiries

Jamie Wallace

0113 292 5500

Jamie.wallace@avisonyoung.com

Visit us online

avisonyoung.co.uk