

**South Staffordshire Council**

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# **South Staffordshire Local Plan 2023 - 2041**

## **Local Plan Review**

Pre-Submission  
Consultation Statement  
Parts 1 & 2

Regulation 22 (1) (c) (i)-(v) (d)

December 2024

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South Staffordshire  
Pre-Submission Consultation Statement

Part 1

Regulation 22 (1) (c) (i)-(ii)

Publication Plan 2024 Publicity and Procedures

## 1. Introduction

- 1.1 All planning authorities have a strategic plan which provides a framework for the future planning of their area and contains policies for the determination of planning applications. South Staffordshire’s current Local Plan is made up of two main documents, the Core Strategy (2012) and the Site Allocations Document (SAD 2018).
- 1.2 We have now begun a review of the Core Strategy/SAD and aim to prepare a single Local Plan which will replace these two documents. The new plan will run from 2023 until 2041, and we began the process in 2018 by collecting evidence and undertaking a number of public consultations as part of the review process. The most recent consultation was a pre-submission Regulation 19 consultation held in April/May 2024.
- 1.3 The Consultation Statement relates to the Local Plan 2023 – 2041 **pre-submission (Publication Plan 2024)** and is set out in 3 separate parts:
- Part 1 outlines the consultation methods used by the council and identifies the local communities and organisations that were consulted. [Reg 22(1) (c) (i)-(ii)]
  - Part 2 summarises the main issues raised through the Publication Plan consultations, and identifies the number and type of responses received. [Reg 22(1) (c) (iii)-(v) (d)]
  - Part 3 is a Schedule of Representations and Responses which summarises the issues raised by respondents together with the council’s response and includes reference to any minor modifications that have been proposed as a result of the representation. [Reg 22(1) (c) (iii)-(iv)]
- 1.4 The Publication Plan 2024 consultation was carried out to meet the requirements set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. The regulations set out the legal requirements that LPAs must comply with in relation to early engagement. This is set out in **Regulation 18 – Publication of a Local Plan** and requires the Council to:
- (a) make a copy of each of the proposed submission documents and a statement of the representations procedure available in accordance with regulation 35, and
  - (b) ensure that a statement of the representations procedure and a statement of the fact that the proposed submission documents are available for inspection and of the places and times at which they can be inspected, is sent to each of the general consultation bodies and each of the specific consultation bodies invited to make representations under regulation 18(1).



- 1.5 The Council has an adopted [Statement of Community Involvement](#), or SCI, which sets out how we aim to engage with local communities and stakeholders in plan preparation as well as when determining planning applications. The SCI contains a list of the types of organisations, individuals and statutory bodies that are consulted in preparing a plan. A list of the main bodies/organisations we consulted can be found in Appendix A.
- 1.6 This Consultation Statement is Part 1 and has been prepared to meet the requirements of **Regulation 22 – Submission of documents and information to the Secretary of State (1) (c)**:
- (i) which bodies and persons the local planning authority invited to make representations under regulation 18
  - (ii) how those bodies and persons were invited to make representations under regulation 18

### **Duty to Co-operate**

- 1.7 The Localism Act 2011 brought in the Duty to Co-operate which requires planning authorities and other public bodies to actively engage and consider joint approaches to plan making where appropriate. Meetings have been held throughout the development of the Local Plan with infrastructure and service providers and neighbouring authorities, and the information received has informed the site selection process. It has also been used to keep the Infrastructure Delivery Plan up to date and details of the IDP, Duty to Cooperate Topic Papers and Statements of Common Ground can be found on the council's [Local Plan Review Evidence Base](#) page.

### **Consultation**

- 1.8 The council is committed to involving local communities and stakeholders in the preparation of the Local Plan and sees consultation as an ongoing activity, which feeds the views of residents and consultees into the plan process.
- 1.9 We have an online consultation system which contains a database of people or organisations that have expressed an interest in the Local Plan or have made comments to previous Local Plan consultations. Some of the organisations are statutory consultees such as adjoining local authorities, Natural England, highways etc and others include community groups, parish councils and residents. A full list of the types of individual and bodies we consult can be found in the SCI.
- 1.10 Anyone who makes representations to any Local Plan consultation is automatically added to the database. There is also an opportunity for people to sign up directly by registering on the consultation system.

## Consultation System

- 1.11 Our bespoke online consultation system allows people to register themselves, manage their own responses and view those of other people or organisations, once moderated and published. Individual representors or organisations can monitor their own responses to each of the stages of the review of the Plan going forward. The 2024 Regulation 19 document was uploaded to the system where it could be viewed, and comments made direct online. The document was also published as a pdf on to the council website and copies were made available at deposit locations at parish councils, libraries in South Staffordshire and the Council Offices in Codsall.
- 1.12 All individuals and organisations on the database were notified of the consultation by email or letter.
- 1.13 Respondents could also send their representations in by email or letter if they did not want to use the online system. All duly made responses, however received, were uploaded onto the system which allows for reports to be generated, and responses anonymised and summarised for publication.

## Consultation Approach

- 1.14 Changes in online and digital approaches to consultation, partly in response initially to Covid restrictions, but also to move towards the Government’s digitalisation of planning agenda, meant we continued with our successful hybrid approach to consultation. This approach was established in our Preferred Options consultation, was very well received and led to the council receiving a Certificate of Excellence in the iESE Public Transformation Awards 2022.
- 1.15 The more traditional methods of meetings in village halls, posters, deposit copies at parish councils and libraries, and putting information in our Review magazine, were supplemented by Locality based online Question and Answer sessions and in person appointments, plus increased use of social media, Gov Delivery and council weekly news round up emails sent to parish councils and residents.

## Local Plan review previous consultations

- 1.16 The council carried out 4 separate consultations between 2018 and 2022:
- [Issues and Options](#) - Monday, October 8 until Friday, November 30, 2018
  - [Spatial Housing Strategy and Infrastructure Delivery](#) - Thursday, October 17 until Thursday, December 12, 2019
  - [Preferred Options](#) - Monday, November 1 to Monday, December 11, 2021
  - [Pre-submission 2022 \(Regulation 19\)](#) – Friday, November 11 to Friday, December 23, 2022.

## Local Plan Publication Plan (pre-submission) Consultations 2022 and 2024

- 1.17 Paragraph 35 of the National Planning Policy Framework (NPPF) 2023 states that local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Soundness of the plan is defined as whether it is:
- a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs<sup>19</sup>; 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 – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
  - c) Effective – 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.
- 1.18 The purpose of the Local Plan Publication Plan consultation exercises was to gain views on the soundness and legal compliance of the final Local Plan that was to be submitted to the Secretary of State. The policies and sites contained in the Local Plan were developed as a result of site assessment and evaluation and taking on board information from continuous consultation with stakeholders and statutory bodies, and representations from all previous Local Plan consultations.
- 1.19 The council consulted at Regulation 19 on a pre-submission plan on two occasions. Firstly in November/December 2022, see documents here: [Publication Plan 2022](#). In the 2022 public consultation, the council proposed to plan for a housing target of 9,089 dwellings between 2018 and 2039. This was made up of just over 4,000 dwellings to meet our own housing needs over the plan period (plus completions to date), whilst also making a proportionate and justified contribution to the unmet needs of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) of approximately 4,000 dwellings. It also considered the principle and set out policy direction for a search for a new settlement which would be explored in the preparation of the next plan.
- 1.20 However, the government made changes to the National Planning Policy Framework (NPPF) in late 2022 which meant that the council had to reevaluate its strategy and as a result a revised plan was developed covering the period 2023 –

2041. This plan was consulted on in April/May 2024 and this consultation statement provides the information and context for the consultation.

**Publication Plan 2024: Public Consultation 18<sup>th</sup> April 2024 – 31<sup>st</sup> May 2024.**

- 1.21 Consultation on the Publication Plan 2024 was carried out for 6 weeks beginning Thursday 18<sup>th</sup> April and ending at midday on Friday 31<sup>st</sup> May 2024. The Publication Plan 2024 contained those sites, which after evaluation and assessment, were considered the most suitable to be taken forward for allocation at each of the villages identified for development. The strategy for housing sites took 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; this includes two strategic sites at Bilbrook and Penkridge. New strategic employment sites at WMI and Junction 13 add to the 4 existing strategic employment sites in South Staffordshire. Additional Gypsy and Traveller pitches are also identified.
- 1.22 The final sites were selected to meet the adjusted housing numbers which had been revised through the review process to take account of development new to supply since the adoption of the SAD and to take account of the revised plan period
- 1.23 We published the main consultation document and a number of supporting documents which were:
- [Publication Plan 2024](#)
  - [Publication Plan 2024 FAQs](#)
  - [Publication Plan 2024 Summary](#)
  - [Publication Plan 2024 Policy Maps](#)
- 1.24 Supporting and Evidence Base Documents including the Sustainability Appraisal, Habitats Regulations Assessment, Duty to Cooperate Paper, and Updated Infrastructure Delivery Plan can be seen on the [Evidence Base](#) page.
- 1.25 The Publication Plan 2024 contained the Council's final proposed sites for new housing development; strategic employment; pitch options for Gypsies and Travellers; and amendments to Green Belt/Development boundaries.

**Publicity and Procedures**

- 1.26 We wrote to everyone on our Local Plan Register, by email or letter, to advise them the consultation was starting and where the documents were available to view. The documents were made available online on the council's website prior to the official start of the consultation on 18<sup>th</sup> April 2024 at [Publication Plan 2024](#). There was a banner on the main page of the council website which linked directly to the Publication Plan consultation page, and a link direct to the document via the consultation system.
- 1.27 Hard copies were also provided at:

- Council Offices, Community Hub, Wolverhampton Road, Codsall
- All 27 South Staffordshire Parish Councils
- Local libraries in South Staffordshire

#### Media - Newspapers and South Staffordshire Review

- 1.28 A public notice was placed in the Express and Star and Chronicle newspapers covering the district on 18 April 2024.
- 1.29 Articles are published in each edition of the council’s Review newspaper to keep residents up to date about progress with the Local Plan review. Editions 81-84 are relevant to the 2024 Publication Plan.

#### Media – Social Media and Mailshots

- 1.30 We used frequent social media posts to provide information, respond to questions, provide links for online meetings and in person appointments, and to alert people to the consultation dates and deadlines for responses. We were made aware that the consultation also featured and was discussed and shared on local Facebook groups such as Perton Residents’ Page, Essington Live, Wombourne Online, Penkridge Matters, Bilbrook Codsall and Surrounding Areas and Kinver Past and Present and by various action groups. Parish councils also shared the information widely on their own Facebook pages and websites.
- 1.31 The council uses GovDelivery which is a web-based e-mail subscription management system that allows members of the public/organisation to subscribe to news and information. This takes the form of a weekly news roundup which is sent to subscribers and was shared on social media.

#### Digital and In Person Meetings

- 1.32 Following on from the success of our in-person events and online Q&A sessions established for the Preferred Options consultation, we tailored the events on a locality basis, but anyone from any area within or outside South Staffordshire could attend and pose questions.
- 1.33 We held separate in person appointment days for members of the public at five locations:
- Locality 1 Penkridge, Haling Dene Centre – Tuesday 7 May 2024
  - Locality 2 Brewood Library – Wednesday 15 May 2024
  - Locality 3 Essington Community Centre – Tuesday 23 April 2024
  - Locality 4 Codsall Community Hub – Monday 20 May 2024
  - Locality 5 Wombourne Civic Centre – Wednesday 1 May 2024

These took place between 10.30am – 7.00pm with senior planning officers, with up to six people attending each slot. This helped focus discussions on the concerns of the attendees, and a far more personalised approach. Although they were Locality based locations, anyone could attend from any part of, or from outside of, the district.

- 1.34 Microsoft Teams virtual online Q&A sessions were programmed into the public engagement schedule. Links were made available to the sessions via Facebook, council website, parish councils, and direct mailshots, with no need to register so that as many people as possible had the opportunity to join in, from any location. There were 2 two-hour, evening online sessions undertaken during the consultation period, plus a bespoke session for parish councils. They took the form of an initial presentation by officers about the Publication Plan, followed by an open forum, where people could pose questions in the chat box to senior planning officers.
- 1.35 Council officers were also available at the Council Offices in Codsall to discuss the Publication Plan documents during normal working hours (8.45am – 5pm, Monday - Friday) in person by appointment, or Microsoft Teams meetings could be arranged, or via telephone call for the whole 6-week consultation period. Copies of the documents relating to publicity and procedures can be seen in Appendix B.

South Staffordshire  
Pre-Submission Consultation Statement

Part 2

Regulation 22 (1) (c) (iii)-(v) (d)

Publication Plan 2024 – Analysis of Responses  
& Key Issues Raised

## 2. Publication Plan 2024 Consultation

2.1 **Part 2** of this Consultation Statement has been prepared to meet the requirements of **Regulation 22 – Submission of documents and information to the Secretary of State (1) (c)**:

- (iii) a summary of the main issues raised by the representations made pursuant to regulation 9
- (iv) how any representations made pursuant to regulation 19 have been taken into account
- (v) if representations were made pursuant to regulation 20, the number of representations made and a summary of the main issues raised in those representations

### **Responses to the Publication Plan 2024 Consultations**

2.2 Responses were received from a number of organisations, statutory bodies, planning agents, developers, and interested parties, including residents. Some respondents completed individual response forms highlighting specific policies and/or text within the Publication Plan 2024 and the reasons for their objections/support; others responded by way of letter or email and many of the agents/developers included additional documents/evidence to support their responses. Where no issues of soundness or legal compliance relating to a specific policy were explicitly stated, the council has sought to categorise the substance of the response to the most relevant policy or issue.

2.3 All responses are available on the council's website and on the council's [examination webpages](#). The council has also prepared a separate table of representations and responses which summarises the main issues raised by respondents together with the Council's response along with a reference to any minor modifications that have been proposed as a result of the representation. This **Schedule of Publication Plan Representations and Responses** is **Part 3** of the Consultation Statement.

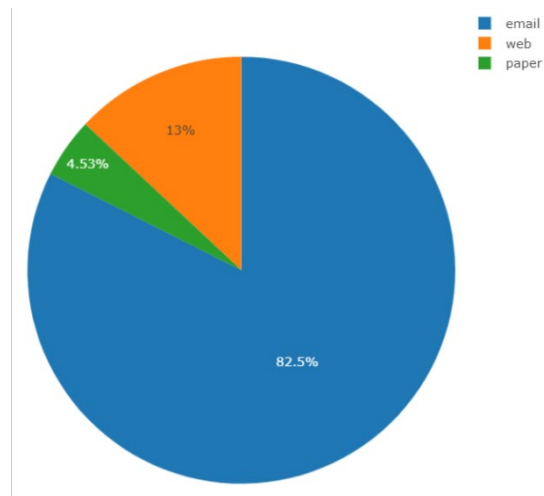
### **Analysis of Responses**

#### **Making Representations**

2.4 In line with the government's digitalisation of planning agenda, we encouraged people to make representations electronically using the consultation system, where there was an opportunity to make comments directly onto the Publication Plan document specific to the requirements of Regulation 19. People could also email [localplans@sstaffs.gov.uk](mailto:localplans@sstaffs.gov.uk) or send by post to the Council Offices. We



provided a guidance note and response form based on the template issued by PINS. A significant number of responses (82.5%) were received via email.



Together with the online consultation system, over 95% of responses were received electronically.

### Responses to the Consultation

- 2.6 There were 385 unique respondents, and detailed analysis of the comments led to 1620 representations. Responses can be broken down into 3 different general response types plus petitions:
- Responses from statutory bodies and stakeholders, such as Natural England, Environment Agency, Parish Councils etc
  - Responses from agents representing sites and/or landowners
  - Responses from general public and others
  - Petitions
- 2.7 In the Publication Plan document people could comment against any paragraph, so there were extensive opportunities to comment. The majority of residents gave their own views, particularly, on site allocations, or used standard wording provided by actions groups as the basis for their comments. Most respondents did not make comments on soundness or legal compliance and the main issues raised by residents related to specific sites. Many respondents also signed petitions and action group forms in addition to any responses they had made as individuals. There was support from residents in favour of the 2024 plan, which contained fewer housing sites than the Publication Plan 2022.

2.8 The top five areas for comment were:

<b>Topic</b>	<b>Total Respondents</b>	<b>Support</b>	<b>Object</b>	<b>Comment</b>
<b>SA3 Housing Allocations</b>	191	29	212	52
<b>DS5 Spatial Strategy to 2041</b>	136	81	89	25
<b>DS4 Development Needs</b>	56	11	69	36
<b>DS1 Green Belt</b>	37	11	28	14
<b>HC3 Affordable Housing</b>	36	9	17	17

- 2.9 Each response was read, and comments were assigned by respondent against each element of the Plan. It is possible that a resident may have sent us an email, followed by a duplicate letter, and completed pro-forma produced by a local action group.
- 2.10 Where people used the consultation system direct, they were able to choose to respond to the soundness and legal compliance questions. Where the representations were uploaded from emails and letters, the assessment of support or object was not definitive, but rather more indicative of an overall sentiment from the full representation.
- 2.11 Planning Agents and developers varied in how they submitted responses, some sending an email per client, others sending one email covering a number of clients. In the same way, the comments have been recorded by agent, against each client separately before objections/supporting comments were attributed to each question.
- 2.12 It is important to note that it is not the volume of responses which is given weight, but the substance of the representations as they relate to material local planning considerations. For example, Site A with 500 objections will not be discounted against Site B with 50 objections just because Site A received a higher number of objections. This is because the level of responses made does not mean the planning issues raised in the comments have more significance. Equally, if one person has raised an issue, say on the impact of development on, or loss of Green Belt, that is taken no less seriously than if 500 people make the same point. It is not 500 times more serious, because more people have objected on that issue.
- 2.13 The table below shows how many individual or organisations made responses.

Unique Respondents

<b>Publication Plan 2024 Consultation</b>	<b>Duly Made</b>	<b>Late/Invalid Responses</b>
<b>Number of Respondents</b>	385	9

2.14 The table below shows the percentage split of representations made.

Summary of Comments

<b>Publication Plan 2024 Consultation Representations</b>	<b>Support</b>	<b>Objections</b>	<b>Comment</b>	<b>Total</b>
<b>Representations</b>	20%	50%	30%	100%

2.15 Paras 2.20-2.23 give a general breakdown of key issues raised The council has taken into account the issues raised in the full response from each contributor before responses were redacted and summarised for publication online here: [South Staffordshire - Login \(oc2.uk\)](#)

**Summary**

2.16 The Council undertook wide ranging public consultation with stakeholders, landowners, developers, statutory bodies and local communities in line with the requirements set out in the Town and Country Planning (Local Planning) (England) Regulations 2012, our adopted Statement of Community Involvement (SCI) and under the Duty to Co-operate. This resulted in a 6-week period of public consultation in early 2024.

2.17 The consultation was widely publicised through a variety of means including online, posters, public exhibitions, the council’s Review newspaper, and social media including Twitter and Facebook. Officers were available throughout the consultations to answer queries and discuss the proposals in person, by telephone and through email.

2.18 The responses to the consultations have been read and recorded and the information in them has been used to take the Publication Plan 2024 forward to submission to the Secretary of State. This has resulted in a number of modifications to the plan and these detailed in a separate modification document.

2.19 All responses received to the Publication Plan 2024 consultation are available on the council’s website examination pages at: [Responses to Regulation 19 Consultations- 2024 | South Staffordshire District Council](#) A summary of the representations received, the Council’s response and any modifications proposed can be found in Part 3 of this Consultation Statement.

## Key Issues Raised

### 2.20 Publication Plan 2024

- There was general support from the development industry for the proposed allocated sites, but the overall view was that the council had not allocated sufficient sites and that the housing target should be increased to at least the level set out in the Publication Plan 2022.
- Generally strong support from many residents for the reduction in Green Belt sites allocated since the previous version of the plan.
- Objection from many developers and some Duty to Cooperate partners for the reduction our housing requirement, including lower contribution to unmet needs of the wider Greater Birmingham and Black Country Housing Market Area. Many developers arguing that further Green Belt release through the plan is required.
- Some developers felt that South Staffordshire’s Local Housing Need should be uplifted to reflect economic growth proposals and level of affordability.
- Some developers felt it would be more appropriate for the Local Plan to be examined under the previous 2021 NPPF.
- Conflicting views on the 10% plan flexibility for housing numbers (i.e ‘over allocation) proposed, with developers often arguing it should be higher and some residents suggesting that this buffer is not required.
- Some objections from employment omission sites to our employment land requirement, with some arguing that our proposed approach, and evidence underpinning it, underestimate the district’s employment land needs.
- A number of site-specific objections from residents, with by far the greatest volume of objection to the proposed allocation of Site 036c Land at Weeping Cross. Numerous reasons cited including impact on Stafford Borough’s infrastructure, impact on the landscape and historic environment and its location isolated from other South Staffordshire villages and away from neighbouring areas where unmet need is originating.
- A number of site-specific objections from developers promoting omission sites.
- Objection from some developers to policies that are an added cost to development and viewed as too restrictive, including policies on housing mix, affordable housing, sustainable construction and space standards
- Issues raised by other statutory bodies, including from Natural England in relation to air quality, and National Highways regarding assessing impacts on the Strategic Road Network.

### 2.21 Supporting Documents

- Some objections to the SA objectives, including the consideration of Green Belt under SA Objective 4 ‘Landscape and Townscape’ as well as other sites specific objections to SA scoring.

- Viability implications of some policies that represent a cost to the developer (e.g NB6A: sustainable construction).

2.22 Policies with no representations

- HC9: Gypsy, Traveller and Travelling Showpeople
- EC6: Rural workers dwellings
- EC7: Equine related development
- NB9: Canal network

2.23 The full summaries of points raised, and the council's response can be seen in Part 3 of this consultation statement.



**South Staffordshire Council**

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South Staffordshire  
Pre-Submission Consultation Statement

Part 2b

Regulation 22 (1) (c) (i)-(ii)

Publication Plan 2024 – Schedule of Publication Plan 2024  
Publicity and Procedures Appendices

December 2024

## **Appendix A**

### **List of Main Consultation Bodies/Organisations**

- Parish Councils

As community representatives, the 27 parish councils within South Staffordshire and those parish councils adjoining the district are consulted as part of the Local Plan consultation process

- Local residents and communities

All residents, whether those living within the districts or in areas adjoining it, that have previously made comments at any stage of the plan review, or who have registered on the council's Local Plan database are automatically contacted and invited to make comments at each stage of plan review. The council uses a variety of means to engage with its residents throughout the development of the plan.

- Neighbouring Authorities

This includes adjoining councils/planning authorities, those within the wider housing and employment market areas, and those with which we have a Duty to Cooperate. Various services within Staffordshire County Council, particularly those with responsibility for highways, education, flood risk, mineral and waste, in addition to County Councillors are engaged throughout the process.

- National, Regional and Local Organisations

The council ensures that statutory bodies are consulted as required and that other existing stakeholder bodies that have requested to be on the council's Local Plan Database are contacted. This includes local schools, GP surgeries, businesses, community and civic groups, Housing Associations, utility and service providers and stakeholders and partners.

- Agents/Developers/Landowners

Many of these organisations and individuals are already proactively involved the Local Plan process through site submissions (SHELAA) and are registered on the council's database.

- Members of Parliament and Local Members

Government representatives of South Staffordshire and adjoining areas, plus councillors from adjoining councillors where they have requested to be kept informed are engaged in the plan process.

## Appendix B

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**Please ask for:** Strategic Planning Team  
**Direct Dial:** (01902) 696423  
**Email:** [localplans@sstaffs.gov.uk](mailto:localplans@sstaffs.gov.uk)

Date: 17 April 2024

## **SOUTH STAFFORDSHIRE LOCAL PLAN REVIEW** **REGULATION 19 PUBLICATION PLAN CONSULTATION 2024**

We are writing to you because you have made comments previously or asked to be kept updated about the Local Plan, and we are now beginning the final stage of public consultation before the plan is submitted to the Secretary of State.

The Publication Plan 2024 contains the final sites for housing and employment, pitches for Gypsies and Travellers, and new and updated policies which will be used to decide planning applications when it is adopted. Sites have been chosen taking on board responses to consultations over the past 4 years, including the previous Publication Plan consultation held in 2022, and drawing on a great deal of information and evidence from planning specialists, stakeholders, statutory bodies, agents, residents, and community groups.

This is a revised strategy, taking account of changes in the government's national planning policy published in late 2023, and in light of updated evidence. The sites are based on robust planning evidence, and to meet current national planning policy and our legal Duty to Cooperate.

This stage of consultation is different to earlier stages because it is about the legal soundness of the plan. Has the council prepared the plan positively? Is it justified and effective? Does it comply with national planning policy? Any comments you make should relate to these issues and they will be sent to the independent Planning Inspector who will be appointed to conduct a formal Examination into the plan, which will include public hearing sessions. We will also send the comments we received to the consultation held in 2022 to the Inspector.

Our consultation runs for 6 weeks from **Thursday, April 18 until 12 noon Friday, May 31, 2024**. To help you we have produced a FAQ Sheet and a Guidance Note to help explain the process for this consultation.

Comments must be made in writing and the simplest way to do this is by using our online consultation system. You can make comments on a specific policy or area of the plan, and they will be uploaded straight into the system. If you have made comments previously, you can log in as we will already hold your details.

The Publication Plan and supporting evidence are available to view online at [www.sstaffs.gov.uk](http://www.sstaffs.gov.uk) and there will be hard copies of the plan at the Community Hub in Codsall, your local parish council office and libraries in South Staffordshire.

All comments made will be submitted with the Plan to the Secretary of State who will appoint an independent Planning Inspector to hold a Public Examination into the Local Plan review. Dates for the Examination will be set by the Planning Inspectorate (PINS). The Inspector will decide whether or not the plan can be adopted or if any changes need to be made. If you make comments to this consultation, you will be notified of the Examination timetable.

If you wish to speak to someone from the Strategic Planning Team about the consultation, there are many ways you can do this. We have some in-person public consultation events (by appointment only), online Q&A sessions, virtual appointments or you can telephone on 01902 696423 to speak to us direct. See the information below about how to take part in the events.

We hope you will take the time to be involved and respond to our consultation, but if you have any queries, please contact a member of the Strategic Planning Team.

## Strategic Planning Team

**Sessions are planned in each Locality, however you can attend any session, whether you live in South Staffordshire or elsewhere.**

### **Online Q&A Sessions: 6pm – 8pm**

To join a meeting please look on our website for the meeting link.

Wednesday, 8<sup>th</sup> May Localities 1,2 and 3

Monday, 13<sup>th</sup> May Localities 4 and 5

### **In Person Locality Sessions: 10.30am – 6.30pm**

**by appointment only** (maximum of 6 people per appointment) call 01902 696423 to make an appointment

Tuesday 23 April	Essington Community Centre
Wednesday 1 May	Wombourne Civic Centre, Council Chamber
Tuesday 7 May	Haling Dene Centre, Penkridge
Wednesday 15 May	Brewood Library
Monday 20 May	Codsall Community Hub

**Virtual Appointments (Microsoft Teams):** by arrangement call 01902 696423

**Telephone:** 01902 696423 between 9am and 5pm Monday – Friday

Comments can also be sent to [localplans@sstaffs.gov.uk](mailto:localplans@sstaffs.gov.uk) or by post to South Staffordshire Council, Community Hub, Wolverhampton Road, Codsall, South Staffordshire WV8 1PX.



## Proposed Submission Plan (Regulation 19 Publication Stage)

# Representations Form Guidance Note April 2024

This **Guidance Note** has been prepared to assist you in responding to the **Proposed Submission Version Local Plan** (Publication plan).

- The note is based upon the model Guidance Note prepared by the Planning Inspectorate around Local Plans and Examination.
- The consultation runs for 6 weeks from Thursday 18 April until 12 noon on Friday 31 May 2024. **All representations must be received in writing by 12 noon on Friday 31 May 2024.** Only representations received within the consultation period have a statutory right to be considered by the Inspector at the future Local Plan Examination.
- Please read our [Data Protection & Privacy](#) before submitting a response.
- The Local Plan, all supporting documents, and further help can be found at: [Local Plan Review | South Staffordshire District Council \(sstaffs.gov.uk\)](#)

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## Introduction

Before a council can adopt a Local Plan, it must first publish a final draft version and invite representations (comments) on it. The Plan must then be submitted to the Secretary of State, with supporting documents and all representations received on the final draft.

The Secretary of State will appoint an independent Planning Inspector to conduct an [Examination in Public](#). The Inspector's role is to consider whether the Plan is **'sound' and 'legally compliant'** (including the [Duty to Cooperate](#)). In doing this they will consider any representations received on the final draft and hold a public hearing where the main matters and issues raised in the representations can be discussed in person.

Following the Examination, the Inspector will publish a report setting out whether the Plan is sound or unsound. We will consult on any proposed modifications recommended by the Inspector. If found to be sound, the council can adopt the Plan. Once adopted the Plan will replace the existing Core Strategy and Site Allocations document (SAD) which currently make up the Development Plan for the district.

The scope of the examination is set by The Planning and Compulsory Purchase Act 2004 (PCPA) which states that the purpose of the examination is to consider whether the Plan complies with the relevant legal requirements, including the Duty to Cooperate, and is sound. The Planning Inspector will consider all representations made within the consultation period which runs until **12 noon on Friday 31 May 2024**.

## Soundness

The tests of soundness are set out in paragraph 35 of the National Planning Policy Framework (NPPF). Plans are sound if they are:

- a) **Positively prepared** - 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.
- b) **Justified** - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.
- c) **Effective** - 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.
- d) **Consistent with national policy** - enabling the delivery of sustainable development in accordance with the policies in the Framework and other statements of national planning policy, where relevant.

If you think the content of the Plan is not sound because it does not include a policy on a particular issue, you should go through the following steps before making representations:

- a) Is the issue with which you are concerned already covered specifically by national planning policy?
- b) Is the issue with which you are concerned already covered by another policy in this Plan?
- c) If the policy is not covered elsewhere, in what way is the Plan unsound without the policy?
- d) If the Plan is unsound without the policy, what should the policy say?

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## Legal Compliance and Duty to Cooperate

You should consider the following before making a representation on legal compliance:

- a) The Plan should be included in the current Local Development Scheme (LDS) and the key stages should have been followed. The LDS is a programme of work prepared by the Local Planning Authority for the Preparation of the Local Development Plan and other key

documents. The current LDS was updated in September 2023 and is available at: [LDS Sept 2023.pdf \(sstaffs.gov.uk\)](#)

- b) The process of community involvement for the Plan in question should be in general accordance with the Council's Statement of Community Involvement (SCI). The SCI sets out the Council's strategy for involving the community in the preparation and revision of plans and the consideration of planning applications. The Council's SCI can be found at: [Adopted Statement of Community Involvement 2019 \(sstaffs.gov.uk\)](#)
- c) The Council is required to provide a Sustainability Appraisal (SA) report when it publishes a plan. This should identify the process by which SA has been carried out, the baseline information used to inform the process, and the outcomes of that process. SA is a tool for assessing the extent to which the Plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. The Sustainability Appraisal can be viewed at: [Local Plan Review Evidence Base \(sstaffs.gov.uk\)](#) *The Plan should also comply with all other relevant requirements of the PCPA and the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended.*

**The following matters should be considered before making a representation on compliance with the Duty to Cooperate:**

- Section 33A of the Planning & Compulsory Purchase Act requires the Council to engage constructively, actively, and on an ongoing basis with neighbouring authorities and certain other bodies over strategic matters during the preparation of the Plan.
- The Council is expected to provide evidence of how they have complied with the Duty. Non-compliance with the Duty to Cooperate cannot be rectified after the submission of the Plan. Therefore, the Inspector has no power to recommend modifications in this regard.
- Where the Duty has not been complied with, the Inspector cannot recommend adoption of the Plan.

More information and a copy of the South Staffordshire Local Plan review document can be obtained at: [Local Plan Review | South Staffordshire District Council \(sstaffs.gov.uk\)](#)

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## General Advice

If you wish to make a representation seeking a modification to the Plan or part of the Plan you should set out clearly in what way you consider the Plan or part of the Plan is legally non-compliant or unsound, having regard as appropriate to the soundness tests above.

**Your representation should be supported by evidence** wherever possible. It will be helpful if you also say precisely how you think the Plan should be modified.

You should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification. You should not assume that you will have a further opportunity to make submissions. Any further submissions after the Plan has been submitted for examination may only be made if invited by the Inspector, based on the matters and issues they identify.

## Group Submissions

Where groups or individuals share a common view on the Plan, it would be very helpful if they would make a single representation which represents that view, rather than many separate representations repeating the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

Please consider carefully how you would like your representation to be dealt with in the examination: whether you are content to rely on your written representation(s), or whether you wish to take part in hearing session(s). Only representors who are seeking a change to the Plan have a right to be heard at the hearing (if they make a request).

In considering this, please note that **written and oral representations carry the same weight** and will be given equal consideration in the examination process.

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## Data Protection & Privacy

Personal data processed by the Council through the submission of representations is necessary to perform a task in the public interest and has a clear basis in law.

To ensure an effective and fair examination, it is important that the Inspector and all other participants in the examination process know who has made representations on the Plan. Therefore, any representations you submit will be treated as public.

We cannot accept anonymous representations; you must provide us with your name and contact details. The Council will publish names, organisations and the content of representations on its website. Other personal information including email and property address details will not be published or made available for public inspection. However, all representations including all submitted personal information will be provided to the Local Plan Examination Programme Officer, the Planning Inspectorate, and the person appointed by the Secretary of State to conduct the examination.

Representations are submitted on the basis that you consent to the use of your data including for the purpose of keeping you informed of Local Plan progress. Your contact details will be held on the Local Plan Consultation Database. Relevant notifications will be sent to you at appropriate stages.

The Planning Inspectorate has published a Privacy Statement on how they manage personal information which can be accessed through the published procedural guide for Local Plan examinations, available at:

<https://www.gov.uk/government/publications/examining-local-plans-procedural-practice>

For more information on how South Staffordshire Council processes your data please see our [Data Protection \(Strategic Planning\) | South Staffordshire District Council \(sstaffs.gov.uk\)](#)



**Local Plan**  
Publication Stage  
Representation Form

Ref:

(For  
official  
use only)

**Name of the Local Plan to which this  
representation relates:**

**South Staffordshire Council  
Local Plan 2023 - 2041**

**Please return to South Staffordshire Council by 12 noon Friday 31 May 2024**

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

## Part A

### 1. Personal Details\*

*\*If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

### 2. Agent's Details (if applicable)

Title	<input type="text"/>	<input type="text"/>
First Name	<input type="text"/>	<input type="text"/>
Last Name	<input type="text"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text"/>	<input type="text"/>
Line 2	<input type="text"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text"/>	<input type="text"/>



## Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph  Policy  Policies Map

4. Do you consider the Local Plan is :

(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
(2) Sound	Yes	<input type="text"/>	No	<input type="text"/>
(3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text"/>

Please tick as appropriate

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

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

(Continue on a separate sheet /expand box if necessary)

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

(Continue on a separate sheet /expand box if necessary)

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

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

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

**No**, I do not wish to participate in hearing session(s)

**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

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

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

**Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However, your contact details will not be published.**

**Data Protection**

Your details will be added to our Local Plans Consultation database so that we can contact you as the review progresses. South Staffordshire Council will process your personal data in accordance with the Data Protection Act 2018 and the General Data Protection Regulations (GDPR). Our Privacy Notice can be viewed at [Data Protection \(Strategic Planning\) | South Staffordshire District Council \(sstaffs.gov.uk\)](#)

Please return the form via email to [localplans@sstaffs.gov.uk](mailto:localplans@sstaffs.gov.uk) or by post to South Staffordshire Council, Community Hub, Wolverhampton Road, Codsall, South Staffordshire WV8 1PX

**TOWN AND COUNTRY PLANNING (LOCAL) (ENGLAND) REGULATIONS 2012**

**SOUTH STAFFORDSHIRE COUNCIL**

**LOCAL PLAN REVIEW**

- **PUBLICATION (PRE SUBMISSION) PLAN 2023 - 2041**

The Council has published a Publication Plan document for public consultation, together with supporting documents.

There is a 6 week period during which you can make comments on the documents, and they are available to view on our website at [Local Plan Review | South Staffordshire District Council \(sstaffs.gov.uk\)](https://sstaffs.gov.uk)

The documents, response forms and a frequently asked questions sheet are also available at the following locations:

- South Staffordshire Community Hub, Wolverhampton Road, Codsall WV8 1PX on Mondays – Fridays 8.45am to 5.00pm.
- Parish Council offices in the district during their normal opening hours.
- Libraries in South Staffordshire

If you would like to make any comments, you must do so in writing online at <https://sstaffs.oc2.uk/login> or by email direct to [localplans@sstaffs.gov.uk](mailto:localplans@sstaffs.gov.uk) or to the address above.

**Consultation Period:** Thursday 18 April until 12 noon Friday 31 May 2024.

For further information please contact the Local Plans Team on 01902 696423 or see our website at [Local Plan Review | South Staffordshire District Council \(sstaffs.gov.uk\)](https://sstaffs.gov.uk)

**South Staffordshire District Council** - Regulation 19: Town and Country Planning (Local Planning) (England) Regulations 2012. The pre-submission Publication Plan was published on Thursday 18 April 2024 for a six-week period of public consultation. The documents can be viewed at [Local Plan Review | South Staffordshire District Council \(sstaffs.gov.uk\)](https://www.sstaffs.gov.uk) or at the Council Offices, Wolverhampton Road, Codsall, South Staffordshire, WV8 1PX between 8.45am – 5.00pm (Mon-Fri). Copies of the main documents are also deposited with parish councils and libraries in South Staffordshire. Representations must be made in writing by 12 noon on Friday 31 May 2024.

From webpages Publication Plan 2024

## **Consultation Events**

We are holding two online Question and Answer sessions, and five in-person consultation events, to give you the opportunity to find out about the Publication Plan, and put questions to the strategic planning team. These events are open to anyone, within and outside South Staffordshire.

### **Online Q&As**

Evening sessions run between 6pm and 8pm. There will be a short presentation based on [Localities](#) at the beginning of the session, followed by a chance to ask questions live in the chat. Questions do not need to be locality based, you can ask about any part of the district at either meeting. You can also submit questions in advance to [localplans@sstaffs.gov.uk](mailto:localplans@sstaffs.gov.uk) There is no need to register, just click on the links to join the meeting.

- Wednesday, May 8th (Localities 1, 2, and 3) [Meeting Link1](#)
- Monday, May 13th (Localities 4 and 5) [Meeting Link2](#)

### **In Person Appointments**

You can talk to members of the strategic planning team about the Publication Plan consultation at five locations across the district. This is strictly by appointment only, and slots can be booked between 10.30am and 6.30pm by calling 01902 696423. Appointments will be for up to 6 people at a time. Anyone can attend, at any of the locations, you are not restricted to the locality where the meeting is being held.

- Essington Community Centre on Tuesday, April 23rd
- Wombourne Civic Centre (Council Chamber) on Wednesday, May 1st
- Haling Dene Centre, Penkridge on Tuesday, May 7th
- Brewood Library on Wednesday, May 15th
- Council Chamber, Codsall on Monday, May 20th

You can also arrange a personal Teams meeting, or speak with members of the team by phone, call 01902 696423.

## **Making Representations, Forms and Guidance**

Representations must be made in writing and during the formal consultation period, Thursday 18 April until 12 noon Friday 31 May, 2024. Comments made outside this period will not be accepted. Please note representations cannot be kept confidential

and will be available for public scrutiny, including your name and/or organisation (if applicable). However, your contact details will not be published.

The simplest way to make representations is to use our online consultation system: [South Staffordshire - Consultations \(oc2.uk\)](https://www.oc2.uk)

A model representation form can be downloaded, and to request a word version please email [localplans@sstaffs.gov.uk](mailto:localplans@sstaffs.gov.uk) or call 01902 696423.

- [Representation Form](#)
- [Regulation 19 Guidance Note](#)
- [Legal Notice](#)
- [EqIA](#)



## Local Plan Review Publication Plan 2024 Frequently Asked Questions

The Publication Plan (also known as a pre-submission plan) is published for consultation under Regulation 19 which is about the legal soundness of the plan.

This is the time in the plan process that residents, statutory bodies and other organisations, have the chance to put their views forward to the independent planning inspector who will be appointed by the government to examine the plan. People will also have the opportunity to ask to be heard at the public examination sessions.

There will be full examination of the evidence, and how the council has developed the plan in the context of national planning policy, and whether the proposed sites and policies can be justified.

The examination is a democratic process, taking account of the views of all participants which will be heard by an independent planning professional. After the examination process and subject to the plan being found sound, the final decision with whether to adopt the plan rests with the council.

This is the second Publication Plan consultation; the first was held in late 2022. Following changes to the National Planning Policy Framework (NPPF) made by the government in late 2023 and more up to date evidence, we have prepared a revised strategy which will cover the period 2023 to 2041.

### What is a Local Plan?

Every local planning authority must produce a Local Plan which sets out the planning framework for their area. It contains the amount of housing and employment growth being planned for in the next few years and where that growth will be located. It also contains policies which will be used to decide planning applications. The Local Plan is just that, local to the area it covers, so the policies in our Local Plan will be tailored to South Staffordshire.

### Why are we reviewing our current Local Plan?

All councils must review their Local Plans at least every 5 years to take on board updated information. The government has made it very clear that plans should be put in place without delay and having a new, up to date adopted plan will put us in a very strong position to resist developer led, unplanned development in locations outside of our control, or planning by appeal and we believe this is in the best interests of our residents.





## What stage is the Review at?

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We carried out an Issues and Options consultation in 2018, a Spatial Housing Strategy consultation in 2019, a Preferred Options in 2021 and a Publication Plan consultation in 2022. As a result of changes to national planning policy and updated evidence, we are carrying out a further **Publication, or pre-submission**, consultation. This is the version of the plan we want to be adopted, based on the planning evidence we have collected.

## What is a Regulation 19 Consultation, why is it different to previous consultations?

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The process for preparing and adopting a local plan is set out in law under planning regulations. Regulation 19 is different because it is about the legal soundness of the plan. Has the council prepared the plan positively? Is it justified and effective? Does it comply with national planning policy? Any comments you make should relate to these issues and they will be sent to the independent Planning Inspector who will be appointed to conduct a formal Examination into the plan, which will include public hearing sessions. We have prepared a guidance note to explain more. We will also send the representations we received to the 2022 Regulation 19 consultation to the Inspector.

## What is the council's approach?

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We have used non-Green Belt land already earmarked for development in our current plan, with new growth focussed in villages with the most facilities and services and where there are infrastructure opportunities. We have worked hard to bring forward brownfield options first, but there is very little available brownfield land in South Staffordshire. We have contained Green Belt release to our Tier 1 villages which are the most sustainable and have access to the rail network, and this will help us to meet our own housing need in the district. We know there are very difficult decisions to be made in providing new homes and protecting the Green Belt as much as we can, which is why less than **0.2%** is being proposed to be released through the plan.

## What about the Duty to Cooperate?

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All councils must meet a legal test known as Duty to Cooperate. This means we have to engage 'constructively, actively and on an ongoing basis' with our neighbouring authorities over matters which cut across administrative boundaries. In this Publication Plan we are proposing a small level of development towards the unmet housing need of the wider housing market area. We are also providing a contribution to the unmet economic needs of our wider Functional Economic Market Area (FEMA).

## Housing Numbers

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The overall level of development of just over 4,700 homes between 2023 and 2041 is made up of our own district's local housing need, which is set by the government, and a contribution towards the wider housing market area shortfalls. The Inspector will decide if our approach is sound, but we believe the evidence supports our approach.



## Is 'no development' an option?

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The simple answer is no. The government is clear that housing growth is fundamental to revitalising the economy and the thrust of national planning guidance (NPPF) is to significantly boost the supply of homes. The need for housing is not just a national issue, but a local one too. If we don't plan to deliver this growth ourselves, we will lose significant control over where it might go. Having a local plan in place which sets out firm locations and guidelines for development puts us in a much stronger position to defend the district from ad hoc applications.

## What evidence has been used to guide development?

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Preparing a Local Plan is not a simple process. The Plan is supported by a robust **Evidence Base** [www.sstaffs.gov.uk/planning/planning-policy/local-plan-review-evidence-base](http://www.sstaffs.gov.uk/planning/planning-policy/local-plan-review-evidence-base) which has looked at sustainability, the importance of the historic and natural environment, protecting and enhancing our landscapes, access to jobs and services and many other issues, including impact on the Green Belt. Our evidence has been published at each stage of the process so that you can see how the Plan has been developed.

## Green Belt and Landscape Studies

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We have asked specialist consultants to look at what impact development might have on our Green Belt and the landscape of the district. The studies have helped us to see where the most sensitive areas of landscape in the district are and which areas of Green Belt would be most affected by development.

## Why isn't Green Belt land protected from new development?

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The council is committed to the protection of the Green Belt, and we know there are very difficult decisions to be made when we are looking for new sites. Where we have proposed limited Green Belt release, it is in our most sustainable Tier 1 settlements and is supported by infrastructure and community benefits where opportunities exist. We will have to show the Inspector, who decides if the Plan is sound, the reasons why we have chosen to release some Green Belt land.

## How much Green Belt will be released?

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Sites for housing and employment development proposed to be released from the Green Belt amount to less than 0.2% of the Green Belt in the district.

## Are Green Belt and Greenfield the same?

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No, greenfield sites are those which have not previously been built on, or where previous development has blended back into the landscape. Brownfield land is previously developed land, although this excludes agricultural buildings. Green Belt is a planning, not environmental, designation and the Green Belt can include land that is both greenfield and brownfield.

## Climate Change

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The Local Plan contains policies to achieve (regulated) Net Zero on new housing sites and large sites will have whole life carbon assessments. There is a suite of renewable energy policies, including electric charging points on new homes, and there will be a 10% biodiversity net gain on major sites through good design principles.





## Consultation

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The Publication Plan consultation is carried out under formal planning regulations. There is a 6 week public consultation period for comments to be made. Comments must be made in writing between 18 April and 12 noon on 31 May 2024. **Comments made before or after these dates cannot be considered.**

## Community Engagement

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There will be opportunities to discuss the plan with the Local Plans Team throughout the consultation period. We will be holding online Question and Answer Sessions where officers will explain the proposals and you will be able to submit questions for the team to answer. We will also be holding face to face sessions at the Council Offices and in the 5 localities, by appointment, plus online appointments via Teams and telephone.

## Consultation System

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Our consultation system allows you to read the plan and make your comments direct. You can manage your own account and response and see details of other responses when they are published. It's very simple, all you need is your email address to register. Go to <https://sstaffs.oc2.uk/login>

If you made comments on previous consultations and we have your email address, you will already be on the system.

## Stay Informed

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We will keep our website and Facebook page updated with details of the consultation. We will write to everyone who has made comments previously, or who has registered on our database, to let them know about the consultation, where to find the documents and how to submit a response.

## Next Steps

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The Secretary of State will appoint an independent Planning Inspector to conduct an **Examination in Public** [www.gov.uk/guidance/plan-making#plan-examinations](http://www.gov.uk/guidance/plan-making#plan-examinations). The Inspector's role is to consider whether the Plan is **sound and legally compliant** (including the **Duty to Cooperate** [www.gov.uk/guidance/plan-making#duty-to-cooperate](http://www.gov.uk/guidance/plan-making#duty-to-cooperate)). In doing this they will consider any representations received on the final draft and hold public hearing sessions where the main matters and issues raised in the representations can be discussed in person.

All the information on the Local Plan review to date and the supporting documents are available online at [www.sstaffs.gov.uk/planning/planning-policy/local-plan-review](http://www.sstaffs.gov.uk/planning/planning-policy/local-plan-review)



**South Staffordshire Council**

**[www.sstaffs.gov.uk](http://www.sstaffs.gov.uk)**

Council Offices  
Codsall  
South Staffordshire  
WV8 1PX

Tel: **01902 696000**  
or email **[localplans@sstaffs.gov.uk](mailto:localplans@sstaffs.gov.uk)**



# South Staffordshire Local Plan Review

## Planning positively for the future of South Staffordshire

### The Plan

- Plan period now 2023 - 2041
- Avoiding a policy vacuum - existing plan policies run to 2028
- We need to submit the plan by June 2025

### Climate Change and Environment

- All new homes to be (regulated) Net Zero and large sites to have whole lifecycle carbon assessments
- Suite of renewable energy policies
- All developments to result in a biodiversity gain of 10%

### Homes

- The new Local Plan will deliver around 1,400 affordable homes
- 100% of homes built to higher accessibility standards
- Good mix of house types – across all age ranges, from young families to older people
- High quality design
- Less than 0.2% Green Belt to be released for housing development

### People and Communities

- Village centre services and community facilities protected
- Financial contributions towards health infrastructure, where required
- Keep jobs in the district by protecting employment land

### Infrastructure

- Financial contributions towards education infrastructure where schools need expansion
- New first/primary schools and additional retail offer on two strategic sites at Bilbrook and Penkrige
- Highways and active travel infrastructure
- Contributions towards sustainable transport, where required

### Work and Play

- Employment and skills policy would create opportunities for local people
- Full fibre broadband in new homes where possible, to future proof home working and recreational accessibility
- All major housing sites will make contribution towards sports facilities/playing pitches
- Larger sites to provide on-site multi-functional public open space, including children's equipped play areas
- Smaller sites will make a financial contribution towards existing open space



# PLANNING

## Building strong foundations for housing success

**The council recently reaffirmed its commitment to improving the housing offer in South Staffordshire, by formally adopting a new Housing and Homelessness Strategy 2023-2027 in December 2022.**

This updated strategy seeks to ensure that everyone in South Staffordshire is able to afford a home that is suitable for them, whether it be on the open market, or through a local registered provider. In its key priorities, the strategy also recognises the important role the district's housing stock plays in the environment, and in particular, the climate change agenda.

We will continue to build on the strong track record of the previous strategy, which includes completion of over 450 affordable homes, 100 bungalows and three specialist housing schemes. What's more, over 400 properties were adapted through the Disabled Facilities Grant programme and over 1,000 residents were supported through the Warmer Homes South Staffordshire advice line.

***Partnership working remains at the heart of the strategy, recognising the important work that local housing providers, stakeholders, statutory bodies and residents do to improve housing outcomes in South Staffordshire.***

The full strategy is available on the council's website [www.sstaffs.gov.uk](http://www.sstaffs.gov.uk)



## Local Plan update

Consultation on the final stage of the review of the Local Plan took place for six weeks from November 11th, 2022.

We are currently reading through all the responses, and considering the impact of the changes the Government is proposing to national planning policy in their consultation which closes in March.

Cabinet Member for Planning and Business Enterprise, Councillor Terry Mason, said: "We will be seeking clarity on the new national proposals and until we fully understand the potential implications, we will not be submitting the Local Plan to the Inspectorate for examination.

"These are particularly pertinent policies for areas such as South Staffordshire.

"While we await further information, we will continue working on the responses and representations made in response to our Local Plan consultation.

"The council believes the best way to stop unplanned development is to have a sound Local Plan in place, and the plan recently consulted on was in conformity with national planning policy."

For updates on the Local Plan, see [www.sstaffs.gov.uk](http://www.sstaffs.gov.uk)

## Neighbourhood planning power

A Neighbourhood Plan is a way of helping local communities shape the planning of their area.

In South Staffordshire, Neighbourhood Plans can be made by parish councils.

These plans are led and written by the community, not the district council.

Neighbourhood plans must be in line with national policy and the district's Local Plan.

This means they cannot stop development but can influence where development might go.

Neighbourhood Plans cover topics such as housing and development, environmental, landscape and heritage protection, public open spaces and highways issues.

Four Neighbourhood Plans are currently being developed by Bilbrook, Codsall, Kinver and Penkridge parish councils, each of which are at different stages of production.





# PLANNING

## A first for Kinver - and the district

**Kinver parish has the first neighbourhood plan in the district, following a resounding 'yes' vote at the referendum held in August.**

Councillor Victoria Wilson, deputy leader and cabinet member for business enterprise and community infrastructure, said: "The parish council must be very proud to be the first in the district to get their neighbourhood plan across the line. It shows that local communities can have a real say in the planning for their area."

Neighbourhood plans are led and written by the community and are a way of helping local communities influence the planning in their area. Now that the Kinver neighbourhood plan is in place, it will be used when planning applications for the parish are determined.

***Hot on the heels of Kinver are Bilbrook and Penkridge Parish Councils, who are in the early stages of progressing their plans.***

We have produced neighbourhood plan FAQs explaining who is involved and at what stage. [www.sstaffs.gov.uk/planning/planning-policy/neighbourhood-plans](http://www.sstaffs.gov.uk/planning/planning-policy/neighbourhood-plans)



## Local Plan update

Following the council's decision to pause work on its emerging Local Plan in January 2023 to await clarity on proposed changes to national planning policy by the government, we are now aiming for a new public consultation in spring 2024.

Work has begun to refresh the evidence base and look at strategy options, so that when changes to the national planning policy framework are announced, we will be in a strong position to get our new plan in place as quickly as possible.

***No decisions have yet been made about what changes will be made to the previously published plan.***

However, we are now working proactively to put us in a strong position to resist unwanted and unplanned development - and a sound Local Plan is the best way to ensure this.

Keep up to date with news about the review at [www.sstaffs.gov.uk/localplanreview](http://www.sstaffs.gov.uk/localplanreview)

## The Crooked House

Since the devastating fire and demolition of The Crooked House pub in Himley occurred in August, council officers have been working very hard behind the scenes to deal with planning breaches at the site.

This is a multiagency investigation - and we continue to work with partner agencies such as the police, Historic England, building control and the Health and Safety Executive.

***We are building up robust evidence and information about the building, which we know has a huge community following.***

We remain in discussions with the owners about a way forward and were very pleased that they agreed to store bricks on site while investigations continue.

For the most up to date information visit [www.sstaffs.gov.uk/planning/crooked-house](http://www.sstaffs.gov.uk/planning/crooked-house)

# PLANNING

## Rural homes for local people

**A new, high-quality development of five houses and five bungalows is now complete and ready for occupation in Oaken, near Codsall.**

The scheme was developed by Housing Plus Group under South Staffordshire Council's Rural Exceptions Policy.

A local parish survey of housing needs fed into deciding the type and tenure of homes most needed in the area.

The much-needed homes, which are a mixture of social rent and shared ownership, are restricted to people with a local connection to the village.

Leader of South Staffordshire Council, Councillor Roger Lees BEM, said: "South Staffordshire has a strong track record of delivering affordable homes and this scheme is very welcome.

"It is the result of close liaison and partnership working between the council and Housing Plus Group."

South Staffordshire Council chairman and local member for Codsall, Councillor Meg Barrow, added: "We know that staying within the community in which they were born and brought up is very important to many local residents."

Sepp Sargeant, head of development at Housing Plus Group, said: "We are delighted that these attractive, high-quality homes have been completed for local people to rent, as well as to help them get onto the housing ladder through shared ownership.

"These homes will help us to make a positive difference to homes, lives and communities for many years to come, by providing affordable housing for local people."



*L-R: Cllr Roger Lees BEM, Sepp Sargeant, Cllr Val Chapman, Mike Harvey, Cllr Meg Barrow, Grant Mitchell, Lesley Birch and Nick Bates. Pic: Housing Plus Group*

## Local Plan update

Work on our plan was paused last year, awaiting changes by the government to national planning policy.

These changes were announced in late December 2023 and work towards a new public consultation is now taking shape.

The revised strategy taking account of the changes, and details of the next consultation, will be published on the council's website when members have discussed and agreed a way forward.

Find out more via: [www.sstaffs.gov.uk/planning/planning-policy/local-plan-review](http://www.sstaffs.gov.uk/planning/planning-policy/local-plan-review)

In the meantime, ensure you are signed up for automatic alerts so you can give your views when the consultation starts. You can register, manage preferences, and read responses to previous consultations via: <https://sstaffs.oc2.uk/>

## Planning know-how

There are three main areas of planning in South Staffordshire covering applications and appeals, planning policy for local and neighbourhood plans, and planning enforcement.

There is a wealth of information on our website which can help you make a planning application, get copies of planning documents, view planning applications and make comments, access our planning advice service, report a breach of planning, see conservation areas and plans, or find out more about permissions needed for works to trees and hedges.

Visit: [www.sstaffs.gov.uk/planning](http://www.sstaffs.gov.uk/planning)



# HOMES AND PLANNING FOR THE FUTURE

## Bringing a new home back to life

Whilst we appreciate there are many reasons why a property is left empty, we are keen to help owners to bring their properties back into use rather than sitting empty by offering advice on renovating, selling or renting out the property privately.

A recent example of this was the council's involvement in the transformation of one of our longest standing and most problematic empty properties at Hall Lane in Great Wyrley. It was sold last year at the Bond Wolfe auction following the acquisition of an order for sale for unpaid council tax. Councillor Mark Evans, Cabinet Member for Planning and Enterprise Services, said: "Taking this action was only possible after all other avenues had been explored, but it is nevertheless great news for the local community".

However, despite considerable efforts to engage with the owners, the neglected house, which had a collapsed ceiling and overgrown garden, sold for £120,000 to the highest bidder in May 2023.

We are very pleased that the property has now been renovated and it is hoped to bring it back into use to provide an additional family home for local people.

To find out more information on empty properties please visit:

[www.sstaffs.gov.uk/housing/housing-and-homelessness-strategy](http://www.sstaffs.gov.uk/housing/housing-and-homelessness-strategy)



## Keep warm this winter!

The South Staffordshire Warmer Homes scheme, which has received £200,000 from the UK government through the UK Shared Prosperity Fund, can provide residents with free insulation, air source heat pumps, solar panels, boilers and so much more through access to government funding schemes.

Since March 2024, in partnership with Community Home Solutions, we have delivered over £300,000 worth of sustainable retrofit measures to households across South Staffordshire. This resulted in lower energy bills, increased energy performance and helped residents stay warm in their homes.

Community Home Solutions offer free energy advice and support you through the application to access free retrofit measures either through home visits, over the phone or via email.

Contact Community Home Solutions on **0115 718 1822** or visit: [www.sstaffs.gov.uk/environment-and-climate/climate-change/warmer-homes-scheme](http://www.sstaffs.gov.uk/environment-and-climate/climate-change/warmer-homes-scheme)



## Local Plan update



As a result of changes to national planning policy in late 2023, a second Publication Plan consultation was held in April and May this year. The responses to the consultation have been analysed by the planning team with a view to submitting the new Local Plan to the Planning Inspectorate before the end of 2024.

To keep up to date with progress visit:

[www.sstaffs.gov.uk/planning/planning-policy/local-plan-review](http://www.sstaffs.gov.uk/planning/planning-policy/local-plan-review)



## Details of Engagement with Residents – Local Plan Review 2018 to Date

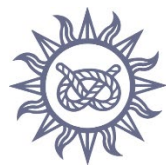
Date	Medium	Method
Autumn 2018	South Staffordshire Review Issue 71	Hard copy delivered to every household in South Staffordshire; copy on Council website
8 October – 30 November 2018	Issues and Options Consultation (Regulation 18)	<ul style="list-style-type: none"> <li>• Hard copies at Council Offices; 27 parish councils; 9 libraries in South Staffs</li> <li>• Council website</li> <li>• Direct mailshot LP Database letters and emails</li> <li>• Social Media incl video</li> <li>• Public Notice E&amp;S</li> <li>• Articles in E&amp;S</li> <li>• Posters at Council Offices and parish council offices</li> <li>• 3 Face to face drop in sessions at Codsall, Penkridge and Wombourne</li> <li>• Council Officers available for appointments at Council Offices or by telephone</li> </ul>
Spring 2019	South Staffordshire Review Issue 72	Hard copy delivered to every household in South Staffordshire; copy on Council website
Summer 2019	South Staffordshire Review Issue 73	Hard copy delivered to every household in South Staffordshire; copy on Council website
17 October – 12 December 2019	Spatial Housing Strategy and Infrastructure Delivery Consultation (Regulation 18)	<ul style="list-style-type: none"> <li>• Hard copies at Council Offices; 27 parish councils; 9 libraries in South Staffs</li> <li>• Council website</li> <li>• Direct mailshot LP Database letters and emails</li> <li>• GovDelivery</li> <li>• Social Media incl video</li> <li>• Public Notice E&amp;S</li> <li>• Articles in E&amp;S</li> <li>• Posters at Council Offices and parish council offices</li> <li>• Council Officers available for appointments at Council Offices or by telephone</li> </ul>
Winter 2019/20	South Staffordshire Review Issue 74	Hard copy delivered to every household in South Staffordshire;

		copy on Council website
Spring 2020	South Staffordshire Review Issue 75	Hard copy delivered to every household in South Staffordshire; copy on Council website
March 2020	A5 Leaflet regarding Local Plan Review	Hard copy sent out to every household with annual Council Tax bills.
Autumn 2020	South Staffordshire Review Issue 76	Hard copy delivered to every household in South Staffordshire; copy on Council website
Winter/Spring 2021	South Staffordshire Review Issue 77	Hard copy delivered to every household in South Staffordshire; copy on Council website
Summer 2021	South Staffordshire Review Issue 78	Hard copy delivered to every household in South Staffordshire; copy on Council website
August/Sept 2021	Pre-preferred Options FAQs	Social media and GovDelivery
1 November - 11 December 2021	Preferred Options Consultation (Regulation 18)	<ul style="list-style-type: none"> <li>• Hard copies at Council Offices; 27 parish councils; 9 libraries in South Staffs</li> <li>• Council website</li> <li>• Direct mailshot LP Database letters and emails</li> <li>• GovDelivery</li> <li>• Social Media incl video</li> <li>• Public Notice E&amp;S</li> <li>• Articles in E&amp;S</li> <li>• Posters at Council Offices and parish council offices</li> <li>• Podcast</li> <li>• Parish Council evening Q&amp;A</li> <li>• 5 Locality online evening Q&amp;A sessions</li> <li>• 5 Locality face to face appointment days 10am-7.30pm</li> <li>• 2 Development Industry face to face appointment days</li> <li>• Council Officers available for appointments at Council Offices or by telephone</li> </ul>
Winter 2021	South Staffordshire Review Issue 79	• Hard copy delivered to every household in South Staffordshire; copy on Council website
Winter 2022	South Staffordshire Review Issue 80	• Hard copies available at council Offices and in community locations; copy on Council website

11 November – 23 December 2022	Publication Plan Consultation (Regulation 19)	<ul style="list-style-type: none"> <li>• Hard copies at Council Offices; 27 parish councils; 9 libraries in South Staffs</li> <li>• Council website</li> <li>• Direct mailshot LP Database letters and emails</li> <li>• GovDelivery</li> <li>• Social Media, council’s own posts and information on local community groups and parish councils</li> <li>• Public Notice E&amp;S</li> <li>• Articles in E&amp;S</li> <li>• TV Screen and posters at Council Offices and parish council offices</li> <li>• Parish Council evening Q&amp;A</li> <li>• 5 Locality online evening Q&amp;A sessions</li> <li>• 5 Locality face to face appointment days 10am-7.30pm</li> <li>• Council Officers available for appointments at Council Offices or by telephone</li> </ul>
Spring 2023	South Staffordshire Review Issue 81	<ul style="list-style-type: none"> <li>• Hard copies available at council Offices and in community locations; copy on Council website</li> </ul>
Winter 2023	South Staffordshire Review Issue 82	<ul style="list-style-type: none"> <li>• Hard copies available at council Offices and in community locations; copy on Council website</li> </ul>
18 April – 31 May 2024	Publication Plan Consultation (Regulation 19)	<ul style="list-style-type: none"> <li>• Hard copies at Council Offices; 27 parish councils; 9 libraries in South Staffs</li> <li>• Council website</li> <li>• Direct mailshot LP Database letters and emails</li> <li>• GovDelivery</li> <li>• Social Media, council’s own posts and information on local community groups and parish councils</li> <li>• Public Notice E&amp;S</li> <li>• Articles in E&amp;S</li> <li>• TV Screen at Council Offices</li> <li>• Parish Council evening Q&amp;A</li> <li>• 2 Locality online evening Q&amp;A sessions</li> <li>• 5 Locality face to face</li> </ul>

		<p>appointment days 10am-7.30pm</p> <ul style="list-style-type: none"> <li>• Council Officers available for appointments at Council Offices or by telephone</li> </ul>
Winter 2024	South Staffordshire Review Issue 84	<ul style="list-style-type: none"> <li>• Hard copies available at council Offices and in community locations; copy on Council website</li> </ul>

Above all accords with the Council's adopted Statement of Community Involvement (SCI)  
Council website updated at every stage of Local Plan review process.



**South Staffordshire Council**

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Pre-Submission Consultation Statement

## Part 3

Regulation 22 (1) (c) (iii)-(v)

Publication Plan 2024 – Schedule of Publication Plan 2024  
Representations & Responses

December 2024

Submission Local Plan Review  
Schedule of Publication Plan 2024 Representations and Responses

**CHAPTERS 1-4 INTRODUCTORY CHAPTERS AND SUPPORTING TEXT**

Respondent	Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Council's Proposed Action/Response
<b>CHAPTER 1: INTRODUCTION</b>							
Jordan, B.D	RES24-126-01	1.1	Plan should reflect the revised NPPF to reflect climate change and Green belt protection	Yes	Yes	Yes	The Local Plan does align with the December 2023 NPPF.  No change proposed.
Cashmore, P & R	RES24-036-01 RES24-036-02	1.1	Have been unfairly able to comment on the land at Dunston M6 J13 the Local Plan being earmarked as potential employment land. On the Preferred Options Plan Nov 2021 and Publication Plan (i) (superseded) Nov 22, this land was not marked on the plans. The plan in 2021 was the actual public consultation, however as the land specified was not identified on this plan there was no need to comment. At this stage, we are now able to only comment on the SSC local plan as a whole.  Site E30, M6 Junction 13 should be removed from then.	No	No	No	The proposed employment allocation at M6, Junction 13 was a site option considered through previous Regulation 18 and Regulation 19 iterations of the Local Plan and assessed through the employment site assessment topic paper 2021 and the 2022 update, as well as through the SA process, allowing consultees to submit representations relating to the site.  The evidence to support our employment land needs was updated in 2024 through the EDNA update 2024. This supported the decision to allocate additional employment land to closely align with median past trends.  The proposed allocation at M6, Junction 13 has been proposed for allocation based on a balanced judgement having regard to a number of considerations and covered in our Economic Strategy and Site Assessment Topic Paper 2024. These include site specific credentials and that it is the only significant site that has been put forward at a key motorway junction in the district on land outside of the Green Belt; shortfalls of employment land in the wider FEMA; and regional evidence of strong demand. Allocating M6 Junction to compliment other sites in the pipeline ensures a strategy that positively and proactively encourages sustainable economic growth.
Smiles, J	RES24-218-01	1.1	Support the plan.	Not stated	Not stated	Not stated	Comments noted.
Szalapski, S	RES24-227-01	1.1	Support the Local Plan as it represents a robust protection of the Green Belt around villages. The Plan prevents urban sprawl and safeguards the character and uniqueness of the rural villages whilst still taking into account of the need for additional housing. The Plan supports national policy by promoting sustainable development near sound transportation routes and adequate infrastructure.  Preserving the natural habitats is vital, supporting biodiversity, ecological health, community environment and ultimately sustainable farming.	Not stated	Not stated	Not stated	Comments and support noted.

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**CHAPTERS 1-4 INTRODUCTORY CHAPTERS AND SUPPORTING TEXT**

Respondent	Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Council's Proposed Action/Response
			The Plan is consistent with National Policy. It enables the delivery of sustainable development in accordance with the policies in the NPPF.				
Brazenell, K	RES24-022-01	1.1	I support the new local plan consultation with the removal of any new greenbelt housing development.	Not stated	Not stated	Not stated	Comments noted.
Bishops Wood Action Group (Dean, C)	RES24-015-01	1.1	No comments.	Yes	Yes	Yes	Comments noted.
Bishops Wood Action Group (Brown, C)	RES24-014-01	1.1	No comments.	Yes	Yes	Yes	Comments noted.
PlanIT Planning & Development for Messer's Jenks and Letts	AGT24-034-03-01	1.2	Satisfied that the Plan period presently meets the test of soundness. However, the plan period should be kept under review in case there is slippage to the expected timescales for plan adoption. If the Plan period does need to be extended, the Council could explore the potential for increasing the size and the capacity of the proposed housing allocation at Keepers Lane/Wergs Hall Road.	Yes	Yes	Yes	The Council considers that adoption by early 2026 is ambitious but realistic. It is accepted that if this is not the case then it will impact on the end of the plan period.
PlanIT Planning & Development for Amadis Holdings Ltd	AGT24-034-01-01	1.2	We are satisfied that the Plan period presently meets the test of soundness. However, if there are delays in the adoption of the Plan then it may be necessary to extend the plan period. In that scenario, the Council may need to allocate additional housing sites to address any increase in the housing requirement.	Yes	Yes	Yes	The Council considers that adoption by early 2026 is ambitious but realistic. It is accepted that if this is not the case then it will impact on the end of the plan period.
PlanIT Planning & Development for Hampton Oak Developments Ltd	AGT24-034-02-01	1.2	Satisfied that the Plan period presently meets the test of soundness. However, the plan period should be kept under review in case there is slippage to the expected timescales for plan adoption. If the Plan period does need to be extended, the Council should explore the potential for increasing the capacity of the allocated sites to address any increase in the housing requirement.	Yes	Yes	Yes	The Council considers that adoption by early 2026 is ambitious but realistic. It is accepted that if this is not the case then it will impact on the end of the plan period.
O'Hara, P	RES24-162-01	1.2	I support the local plan as we need to move forward and provide affordable housing in the area. It needs to be completed though in keeping with local community needs and through consultation all of the way through.	Not stated	Not stated	Not stated	Comment noted.  The plan will meet our affordable housing needs by requiring 30% affordable housing on all major sites.
PlanIT Planning & Development for Miller Homes	AGT24-034-04-01	1.2	Table 1 advises that it is expected the Plan will be adopted in February 2026. In our experience the plan making process is often delayed and there is a real danger that the emerging plan will not have a minimum 15-year plan period. There is a strong possibility of a change in Government which is likely to result in further changes to the plan system and the reversal of the December 2023 NPPF amendments. The plan period should be kept under review and if the plan period does need to be extended, the Council could explore the potential for increasing	Yes	Yes	Yes	The Council considers that adoption by early 2026 is ambitious but realistic. It is accepted that if this is not the case then it will impact on the end of the plan period.



Submission Local Plan Review  
Schedule of Publication Plan 2024 Representations and Responses

**CHAPTERS 1-4 INTRODUCTORY CHAPTERS AND SUPPORTING TEXT**

Respondent	Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Council's Proposed Action/Response
			the capacity of proposed housing allocations. Land at Keepers Lane / Wergs Hall Road has potential for increased completions.				
Home Builders Federation	STA24-024-02	1.2	HBF believe that for the plan to be positively prepared and in line with national guidance, the plan period needs extending to ensure that the Plan has a 15-year timeframe post adoption. As such para 1.2 needs amending to reflect an extended time period. It will be importance the evidence also covers the whole plan period.	No	No	No	The Council considers that adoption by early 2026 is ambitious but realistic. It is accepted that if this is not the case then it will impact on the end of the plan period.
Webb, L	RES24-248-01	1.2	For the plan to be positively prepared and in line with national guidance, the plan period needs extending to ensure that the Plan has a 15-year timeframe post adoption.	Not stated	Not stated	Not stated	The Council considers that adoption by early 2026 is ambitious but realistic. It is accepted that if this is not the case then it will impact on the end of the plan period.
Allan, W	RES24-003-01	1.2	I agree.	Not stated	Not stated	Not stated	Comments noted.
Allan, W	RES24-003-02	1.3	Whilst no extra development preferable, under the circumstances the proposal is best option.	Not stated	Not stated	Not stated	Comments noted.
Allan, W	RES24-003-03	1.4	I support.	Not stated	Not stated	Not stated	Comments noted.
Cain, S	RES24-033-01	1.4	Land south of Wildwood is not an option that should be considered for housing and should remain as Open Countryside.  Existing developments that are coming/recently have come forward are having a negative impact on doctors and schools.	No	No	No	Engagement throughout plan preparation has taken place with the School Organisation Team (SOT) at Staffordshire County Council. They have not indicated that the impact of the proposed allocation is incapable of being mitigated through financial contributions in line with Policy HC15.  Engagement throughout plan preparation has taken place with Staffordshire and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical Commissioning Group). They have not indicated that the impact of the proposed allocation is incapable of being mitigated through financial contributions in line with Policy HC14.  No change proposed.
Goldfinch Town Planning Services	AGT24-020-01-01	1.5	The emerging set of Development Management (DM) policies contained within Publication Stage Report (2024) appear to be of a poor quality (poorly written, lengthy and unclear) and are therefore unlikely to assist colleagues in the Council's Development Management (DM) Team.	No	No	No	The plans Development Management (DM) policies have been developed with input from DM colleagues, and the Council consider these will deliver the vision and strategic objectives of the plan.  No changes proposed.
Allan, W	RES24-003-04	1.5	Best plan available.	Not stated	Not stated	Not stated	Comments noted.

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**CHAPTERS 1-4 INTRODUCTORY CHAPTERS AND SUPPORTING TEXT**

<b>Respondent</b>	<b>Ref</b>	<b>Para No.</b>	<b>Summary of Issue Raised</b>	<b>Legally compliant</b>	<b>Sound</b>	<b>Compliant with Duty to Cooperate</b>	<b>Council's Proposed Action/Response</b>
Blackadder-Weinstein, D	RES24-017-01	1.6	Protecting against unplanned and speculative development is the foundation of support for this plan.	Not stated	Not stated	Not stated	Comments noted.
Carter, M	RES24-034-01	1.7	Agree with approach to tackling climate change.	Not stated	Not stated	Not stated	Comments noted.
Smith, K	RES24-219-01	1.7	Important to preserve green spaces and to mitigate climate change.	Not stated	Not stated	Not stated	Comments noted.
McEwen, S	RES24-148-01	1.7	Agree that the Climate Change Strategy should relate to strategic planning responsibilities and that the Local Plan is a vehicle to encourage sustainable patterns of development, promote carbon resilient design, and protect the natural environment.	Not stated	Not stated	Not stated	Comments noted.
Brazenell, K	RES24-022-02	1.7	It is very important to encourage sustainable patterns of development that promote carbon resilient design and protect the natural environment.	Not stated	Not stated	Not stated	Comments noted.
Taft, R	RES24-228-01	1.7	The expanse of hedgerow which will be lost along Poolhouse Road is huge, the loss of this along with greenspace in Wombourne is contrary to climate change ambitions. Trees will be cut down and animals' habitats will be lost forever.  There is not the infrastructure to sustain the number of houses being proposed.  Disagree with the requirement of 'duty to co-operate' as this has now been repealed and so is no longer necessary.	No	No	No	The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact on habitats sites.
Langford-Rotton, K	RES24-135-01	1.7	In this section flooding needs to be integral to the protection of land. The local areas are already flooding due to over development and unsustainable drainage	Not stated	Not stated	Not stated	Flood risk will be appropriately considered in line with Policy NB7 and national policy.  No change proposed.
Moore, S	RES24-153-01	1.7	Agree that the Climate Change Strategy should relate to strategic planning responsibilities and that the Local Plan is a vehicle to encourage sustainable patterns of development, promote carbon resilient design, and protect the natural environment.	Yes	Yes	Yes	Comments noted.
Moore, S	RES24-153-01	1.8	Agree the Council should follow the NPPF Dec 2023 and place climate change at the centre of policy favouring sustainable development.	Yes	Yes	Yes	Comments noted.
McEwen, S	RES24-148-01	1.8	Agree the Council should follow the NPPF Dec 2023 and place climate change at the centre of policy favouring sustainable development.	Not stated	Not stated	Not stated	Comments noted.
Carter, M	RES24-034-01	1.8	Agree that climate change at centre of policy favouring sustainable development.	Not stated	Not stated	Not stated	Comments noted.
Carter, M	RES24-034-01	1.9	Agree with growth being focussed on Tier 1 villages.	Not stated	Not stated	Not stated	Comments noted.

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**CHAPTERS 1-4 INTRODUCTORY CHAPTERS AND SUPPORTING TEXT**

<b>Respondent</b>	<b>Ref</b>	<b>Para No.</b>	<b>Summary of Issue Raised</b>	<b>Legally compliant</b>	<b>Sound</b>	<b>Compliant with Duty to Cooperate</b>	<b>Council's Proposed Action/Response</b>
McEwen, S	RES24-148-01	1.9	Agree the focus of development should be in the larger villages with greater access to facilities and public transport.	Not stated	Not stated	Not stated	Comments noted.
Moore, S	RES24-153-01	1.9	Agree the focus of development should be in the larger villages with greater access to facilities and public transport.	Yes	Yes	Yes	Comments noted.
Brazenell, K	RES24-022-03	1.9	I agree that the focus for development should be placed in larger villages which have greater access to facilities and public transport. this will help to reduce car dependency. These villages must be provided with the resources to ensure that existing residents aren't negatively affected by these developments.	Not stated	Not stated	Not stated	Comments noted.
Gravel Hill GP	STA24-020-01	1.11	<p>Significant concerns around population expansion and access to primary care at Gravel Hill Surgery in Wombourne. At present there is limited ability to expand to accommodate this. Ask that this is taken into consideration with future planning.</p> <p>Would welcome the ability to work with South Staffordshire Council, the local ICB and Seisdon PCN in order to ensure that the Primary Care health needs of the growing population of our surgery are met. Trust that healthcare provision is taken into account when building development levies are considered by the council.</p>	Not stated	Not stated	Not stated	<p>The Council has engaged with the Integrated Care Board (ICB) through plan preparation whose responsibility it is to consider healthcare provision at the strategic scale.</p> <p>Policy HC14: Health Infrastructure will ensure that where it is demonstrated that existing health facilities do not have capacity to accommodate patients from new development and the new development will result in an unacceptable impact on the existing local facilities, then a proportionate financial contribution or on-site provision will be sought and agreed through engagement with the ICB.</p>
Blackadder-Weinstein, D	RES24-017-02	1.11	Support for a plan-led approach to development is based on the commitment and expectation that it confers on associated planning applications. Without a made plan, applications defer to the lowest common denominator required to pass through via the appeals process.	Not stated	Not stated	Not stated	Comments noted.
Home Builders Federation	STA24-024-02	1.11	HBF believe that this is currently unsound as it fails to plan positively for the future development needs of South Staffordshire. This is illustrated by the wording of para 1.11 which disappointing fails to fully set out the benefits of planning system. These benefits have not been fully captured as there is no mention of positive benefits of new development to current residents and businesses with South Staffordshire who stand to benefit from getting to live in a new home, benefiting from new sustainable development, accessing new affordable housing, securing employment within new employment sites or benefitting from a more energy efficient new home. This paragraph should be revised to show the positive benefits of plan-making and house building. As currently drafted it fails to show the plan has been positively prepared.	No	No	No	<p>This paragraph is predominantly directed at residents and clearly identifies that it is the role of the local plan to deliver new housing, employment land and new facilities.</p> <p>It is not considered that this paragraph needs revising in order for the plan to be positively prepared.</p> <p>No change proposed.</p>
Higgins, T	RES24-105-01	1.11	Concerns relate to the proposed sites in Wombourne, all of which are a long walk to the village centre & local shops especially if you intend to carry heavy bags on your return. If people in the new houses use their cars there is insufficient parking space	No	No	No	Site specific factors have been considered through the Housing Site Assessment Topic Paper 2024. The level of growth for Wombourne reflects suitable non-Green Belt opportunities in and

Submission Local Plan Review  
Schedule of Publication Plan 2024 Representations and Responses

**CHAPTERS 1-4 INTRODUCTORY CHAPTERS AND SUPPORTING TEXT**

Respondent	Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Council's Proposed Action/Response
			available at the moment & the ancient layout & widths of carriageway will not take any more congestion. There is no mention in the plan about providing a shuttle bus service to take residents to local shops.				around the village.  Engagement with Staffordshire County Council highways team has taken place throughout plan preparation. Provision of a shuttle bus is not considered necessary to make the proposed allocations in Wombourne acceptable in planning terms.
JMS Planning for Wolverhampton Halfpenny Green Airport	AGT24-023-01-01	1.12	JMS Planning supports the way in which South Staffordshire has clearly outlined local plan process to date from paragraph 1.12 onwards, including explaining the differences between the current and former publication drafts of the Local Plan. JMS Planning notes that the key distinction between the publication drafts is the change in the amount of Green Belt released (and sites safeguarded) given the removal of the requirement for LPAs to review the Green Belt (paragraph 145). While premature, it would be remiss of JMS Planning to advocate caution based upon the upcoming general election and potential changes to planning policy. With submission to the Secretary of State is likely to take place in January 2025 (Table 1 on pages 4-5) and the general election in July 2024, South Staffordshire must allow for flexibility in its policies to respond to any national policy changes to the NPPF that may occur in the six months prior to submission of the Local Plan.	Not stated	Not stated	Not stated	The Local Plan is being submitted under the proposed transitional arrangements in the July 2024 draft NPPF public consultation, and therefore will be examined under the December 2023 NPPF.  No change proposed.
Goldfinch Town Planning Services	AGT24-020-01-01	1.12	Continue to have concerns in relation to the use of the Consultation Portal (Opus Consult) Local Plan consultation system. The Council has also deliberately obstructed local community groups, members of the public, rural landowners, local businesses, private sector town planning consultants, housing developers, environmental groups and other key stakeholders from the Local Plan-making process by deliberately keeping previous Representations made to earlier rounds of public consultation out of the public domain. The level of unreasonable obstruction referred to above, continuing to withhold critically important Representations previously made to earlier stages of the Local Plan from public view, strongly conflicts with guidance reinforced within the Local Government Ethical Standards.	No	No	No	The Council does not accept this critique. Consultees have been able to respond to the consultation via the council's consultation portal as well as more traditional methods such as email and letter.  All the legislative and procedural requirements for consultation as set out in the Council's Statement of Community Involvement (SCI) have been complied with.
Lower Penn Parish Council	STA24-028-01	1.12	LATE SUBMISSION An ongoing observation regarding all of the public consultations undertaken in this cycle of the Local Plan has been the lack of direct community engagement and poor accessibility of information and/or documents. Too much reliance has been placed on using the council's own website and social media (requiring login) to promote the local plan. This is unsuitable for residents unfamiliar with digital resources. We feel that paper communication received by residents annually ie Council Tax	Not stated	Yes	Not stated	The Council does not accept this critique. Consultees have been able to respond to the consultation via the council's consultation portal as well as more traditional methods such as email and letter.  All the legislative and procedural requirements for consultation as set out in the Council's Statement of Community Involvement (SCI) have been



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			Bills, could have also contained information regarding the Local Plan and subsequent consultations.				complied with.
Home Builders Federation	STA24-024-02	1.12	<p>HBF is disappointed that the Council has rowed back from the level of housing being proposed in the previous Reg 19 consultation, which sought to do much more to help meet the wider housing needs of the HMA and deliver the benefits of growth. We are very disappointed to see the Council's change in direction, and do not agree that the changes to the NPPF require the Council to take this approach. A positively prepared Local Plan for South Staffordshire would require consequential amendments to this section. In addition, HBF request that additional information be providing in the monitoring and review section of the Table One. The Council needs to monitor other things and not just planning applications if they are to use monitoring effectively to ensure that the new Local Plan for South Staffordshire is delivering. It will be important for the Council to also monitor the progress of ongoing discussions with neighbouring authorities and other regional partners. In particular the Council should monitor the policy making and evidence gathering activities around the issue of unmet need within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA).</p> <p>This should include both the level of that need, and how this could/should/is be re-distributed across the HMA. HBF have also commented on the need for an early Plan Review policy to be an essential component of this plan. This will also need to be detailed in this section.</p>	No	No	No	<p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>Work is ongoing with Duty to Cooperate partners across the GBBCHMA to monitor housing delivery and update the 2018 Strategic Growth Study.</p> <p>It is not considered necessary to specifically commit to an early review of the plan as a review of the plan to ensure it is kept up to date is already a requirement of national guidance.</p>
Blackadder-Weinstein, D	RES24-017-03	Table 1	Concerned that the political context could set the district up for future conflict with central government or wider regional bodies like the WMCA which may be making significant changes to the planning system while controlled by a different political party from SSDC.	Not stated	Not stated	Not stated	<p>Comments noted.</p> <p>No change proposed.</p>
Watt, J	RES24-246-02	1.14	<p>Further housing not necessary as Stafford already has several new large housing developments near site 036c, land south of Stafford with more yet to be completed. Any new residents would need to travel for employment and use Stafford Borough facilities but not make any contribution to Stafford.</p> <p>Site 036c should remain as agricultural land.</p>	No	No	No	<p>The justification for proposing site 036c is set out in the Housing Site Assessment Topic Paper 2024. Crucially, the site is a sustainable non-Green Belt opportunity that national policy requires us to consider prior to considering green belt release. Taking all the different considerations together, site 036c has been identified as suitable to contribute to meeting South Staffordshire's housing requirement. Any oversupply that may have been delivered by Stafford is not a relevant consideration when preparing the plan for South Staffordshire as it is a different HMA.</p> <p>No change proposed.</p>

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Webb, L	RES24-248-02	1.16	This version of the South Staffordshire plan seems to be a deliberate attempt to scale back on the delivery of housing that the Council had already accepted was needed and sustainable in the previous Regulation 19 consultation. Failure to address the wider housing needs of the HMA and the refusal to consider further Green Belt release serves to show the Council is failing to positively plan for the future of its area, as national planning policy and guidance requires it to do.	Not stated	Not stated	Not stated	Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.  The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).  No change proposed.
McEwen, S	RES24-148-01	1.17	Agree the Council should update the Local Plan in line with the revised NPPF Dec 2023 to reflect changes to national policy, most notably the protection of the Green Belt.	Not stated	Not stated	Not stated	Comments noted.
City Wolverhampton Council	STA24-012-01	1.17	The SSLP proposes a housing requirement of 4,726 homes over the period 2023-2041, which includes a 640 homes contribution towards unmet needs of the GBBCHMA. This is significantly reduced from that set out in the previous Regulation 19 Plan which identified areas of green belt release to provide land for housing development on the edge of Wolverhampton as the primary source of this contribution. We note the inclusion of land north of Penkrigde on non-green belt land as a housing allocation in this version of the Local Plan, this being consistent with the recommendations of the 2018 HMA Growth Study. This change in approach, moving away from a strategy based on significant green belt release to meet needs arising in neighbouring areas, is made in the context of the current NPPF which post-dates the publication of the previous Regulation 19 Plan. We consider that the revised approach is in principle in accordance with the updated NPPF and therefore sound.	Yes	No	Yes	Comments noted.
City Wolverhampton Council	STA24-012-01	1.17	There are a number of issues which must and can be resolved. Some of these issues will require additional evidence, and changes to the relevant documents including the Local Plan. We are confident that these issues are capable of being addressed.	Yes	No	Yes	Comments noted.  Engagement with City of Wolverhampton Council has continued with our latest positions reflected in a number of Statements of Common Ground which form part of the submission documents.
Hughes, P	RES24-115-01	1.17	Consider the plan to be unsound.  The M6 has since widened since this was last reviewed by the planning inspector, therefore more noise and air pollution,	No	No	No	Site 055 off Cherrybrook Drive, Penkrigde is safeguarded land first established in the 1996 Local Plan.

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			<p>having both an environmental impact and physical impact on residents in the area already.</p> <p>This land is close to a canal and natural habitat, therefore having an impact in these areas also. Concerns over emergency services access already, without the additional housing estate.</p>				Whilst the Council needs to prioritise non-Green Belt land such as site 005 as part of demonstrating exceptional circumstances, the site has been fully reassessed through the Housing Site Assessment Topic Paper 2024 and identified as remaining suitable for allocation. Consultation with infrastructure and service providers has not identified any 'showstopper' constraints which cannot be addressed through appropriate mitigation.
Moore, S	RES24-115-01	1.17	Agree the Council should update the Local Plan in line with the revised NPPF Dec 2023 to reflect changes to national policy, most notably the protection of the Green Belt.	Yes	Yes	Yes	Comments noted.
Brazenell, K	RES24-022-04	1.17	The updated NPPF gives greater protection to the greenbelt which is very relevant to South Staffs. It is important to preserve green spaces for future generations and to mitigate climate change.	Not stated	Not stated	Not stated	Comments noted.
Taylor, R	RES24-234-01	1.17	Approve with caveats.	Not stated	Not stated	Not stated	Comments noted.
Blackadder-Weinstein, D	RES24-017-04	1.17	Support having an up-to-date plan in place.	Not stated	Not stated	Not stated	Comments noted.  No change proposed.
Sutton, M	RES24-226-01	1.17	As the Dunston Junc13 site has only been added at this stage then the residents in that area have not had the same opportunity as other to comments and as per the Statement of Community Involvement (SCI) June 2019 and thus influence and shape future development and to have community involvement from the outset of Local Plan preparation. The Council has not placed a strong enough emphasise as per the Localism Act 2011 to enable them to shape the place where they live. the Council has not complied with the NPPF framework on early, proportionate and effective engagement.	Not stated	Not stated	Not stated	<p>The proposed employment allocation at M6, Junction 13 was a site option considered through previous Regulation 18 and Regulation 19 iterations of the Local Plan and assessed through the employment site assessment topic paper 2021 and the 2022 update, as well as through the SA process, allowing consultees to submit representations relating to the site.</p> <p>The evidence to support our employment land needs was updated in 2024 through the EDNA update 2024. This supported the decision to allocate additional employment land to closely align with median past trends.</p> <p>The proposed allocation at M6, Junction 13 has been proposed for allocation based on a balanced judgement having regard to a number of considerations and covered in our Economic Strategy and Site Assessment Topic Paper 2024. These include site specific credentials and that it is the only significant site that has been put forward at a key motorway junction in the district on land outside of the Green Belt; shortfalls of</p>

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							employment land in the wider FEMA; and regional evidence of strong demand. Allocating M6 Junction to compliment other sites in the pipeline ensures a strategy that positively and proactively encourages sustainable economic growth.  All legislative and procedural requirements for consultation as set out in the Council's Statement of Community Involvement (SCI) have been complied with.
WSP UK Ltd for Seddon Homes	AGT24-045-01-01	1.18 Inset Plan 11	Inset Plan 11 - a main modification is required to Policy Inset Map 11 to include 'Land adjacent to M6 off Ash Flats Lane' (site reference 034) as a cross-boundary housing allocation.	Not stated	No	No	Site Ref 034 is not proposed for allocation as it has been identified as unsuitable in the SHELAA 2024, and therefore a change to the inset plan is not required.  No change proposed.
Brodie, S	RES24-023-01	1.18	The new local plan. Has highlighted the importance of Brownfield first. Saving Green Belts is so important to the climate and to our food chain. Food security should be protected.	Not stated	Not stated	Not stated	Comments noted.
Home Builders Federation	STA24-024-02	1.18	Consequential changes will be needed to the policies map to reflect the HBF's comment on this plan and to make it sound, most notably additional housing allocations.	No	No	No	Comments noted.
<b>CHAPTER 2: SOUTH STAFFORDSHIRE – SETTING THE SCENE</b>							
Home Builders Federation	STA24-024-02	2.3	HBF note the importance of investment and economic growth in the district. In HBF's view this necessitates a higher housing number to support ongoing inward investment as envisaged in the Plan. Additional wording should be added to this paragraph to explain the importance of new housing in supporting economic growth.	No	No	No	The purpose of this paragraph is to provide background on economic growth in the district.  No additional wording is considered necessary.
Blackadder-Weinstein, D	RES24-017-05	2.4	More thought needs to be given in future plans as to how our historic villages adapt to realities of modern life and how the necessary changes can be funded by well-planned and considered development in and around the villages themselves.	Not stated	Not stated	Not stated	Comments noted.
Watt, J	RES24-246-03	2.5	I find this local plan unsound because more houses not needed at site 036c, land south of Stafford as there are already several new large developments in Stafford and more currently under construction.  Site 036c should remain as agricultural land.	No	No	No	The justification for proposing site 036c is set out in the Housing Site Assessment Topic Paper 2024. Crucially, the site is a sustainable non-Green Belt opportunity that national policy requires us to consider prior to considering green belt release. Taking all the different considerations together, site 036c has been identified as suitable to contribute to meeting South Staffordshire's housing requirement. Any oversupply that may have been delivered by Stafford is not a relevant consideration when preparing the plan for South Staffordshire as it is a different HMA.



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							No change proposed.
Fisher, R	RES24-070-01	2.5	It is an attractive place to live because of its rural setting. Providing overflow housing for the West Midlands is not conducive to preserving this character and is not fair to the people who already call it home.	Not stated	Not stated	Not stated	Comments noted.
Johnston, E	RES24-120-01	2.7	Brewood needs to stay as a small village and does not require too many properties and your plan appears to be correct. Roads are small and therefore limits the vehicles on the roads.	Not stated	Not stated	Not stated	Comments noted.
McEwen, S	RES24-148-01	2.8	Agree that Tier 1 villages are assessed as having the greatest access to services and facilities. Tier 5, including Lower Penn, have no access to services and are therefore unsuitable for development.	Not stated	Not stated	Not stated	Comments noted.
Moore, S	RES24-153-01	2.8	Agree that Tier 1 villages are assessed as having the greatest access to services and facilities. Lawnswood and Friars Gorse are not villages or settlements and therefore are unsuitable for development.	Yes	Yes	Yes	Comments noted.
Chapman, J	RES24-040-01	2.8	Agree that Tier 1 villages are the most sustainable. Lawnswood and Friars Gorse are not villages and are not suitable for development.	Yes	Yes	Yes	Comments noted.
Lower Penn Parish Council	STA24-028-01	2.8	LATE SUBMISSION Lower Penn has been classed as a tier 5 village in the SSDC key evidence document The Rural Services and Facilities Audit 2021. This is because of poor sustainability and infrastructure issues. SSDC have now identified that these tier 5 villages do not fulfil the criteria set out in the NPPF for sustainable development and have decided to concentrate on delivering houses in areas where sustainability and infrastructure issues can be met or mitigated. Lower Penn Parish Council agrees with this strategy and finds it sound as it aligns with NPPF guidelines.	Not stated	Yes	Not stated	Comments and support noted.
Brazenell, K	RES24-022-05	2.8	Housing developments should be built in sustainable locations. Tier 4 and 5 villages have poor or no public transport and are in unsustainable developments and therefore should only allow infill type development.	Not stated	Not stated	Not stated	Comments noted.
Blackadder-Weinstein, D	RES24-017-06	Map 1	The settlement tier hierarchy seems slightly opaque and perhaps not nuanced enough. For example, although Wombourne doesn't have a railway station that doesn't mean it is the same as Brewood which is much smaller and has many fewer services and facilities.  At the other end of the scale, bishops wood may be very small in terms of house numbers, but with a primary school, pub and village hall may benefit in the long term from a local plan which could help it sustain vitality and a breadth of demographics.	Not stated	Not stated	Not stated	It is acknowledged that there may be some variation between access to services and facilities for villages within the same tier, however they have been grouped based upon broadly similar characteristics in the Rural Services and Facilities Audit 2021.  No change proposed.

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JMS Planning for Wolverhampton Halfpenny Green Airport	AGT24-023-01-01	Map 1	It is noted the 'Bobbington Airport' or Wolverhampton Halfpenny Green Airport is located in the incorrect location on Map 1 (page 9). The Airport should be located to the east of Bobbington, whereas Map 1 shows the airport to be to the southwest of the settlement.	Not stated	Not stated	Not stated	Minor modification 001: amend Map 1 to more accurately reflect location of Halfpenny Green Airport.
<b>CHAPTER 3: WHAT DOES THE LOCAL PLAN NEED TO CONSIDER</b>							
Turley Associates for Bellway Homes	AGT24-042-01-02	3.1	Kinver - Paragraphs 2.1 – 2.8 set detail the recent history of the Plan and NPPF changes. Wombourne - Paragraphs 2.1 – 2.7 set detail the recent history of the Plan and NPPF changes.	No	No	No	Site details noted.  No changes required.
Blackadder-Weinstein, D	RES24-017-07	3.1	Changes in national and regional politics both likely before the next local plan starts to be put together	Not stated	Not stated	Not stated	Comments noted.  No change proposed.
Lapley, Stretton and Wheaton Aston Parish Council	STA24-026-01	3.6	The plan is effective in joint and cross boundary working on the East but the West side requires further consideration. The reduction in cross boundary allocation is a fair and appropriate approach and protects the green belt, which should be a planning priority.  Wheaton Aston is on the border with Shropshire who are undertaking consultation to allocate land on the South Staffs border and it is requested that officers consider that allocation of Shropshire and the effect on the border to the West.	Yes	Yes	Yes	Effective joint working has taken place with Shropshire Council in the preparation of their emerging Local Plan with a Statement of Common Ground to support their plan agreed.  SoCG between the Council and Shropshire Council has been agreed.  No change proposed.
CPRE Staffordshire	STA24-013-01	3.6	Question the degree to which the Duty to Cooperate has been fulfilled in relation to Stafford Borough Council particularly with respect to site 036c (South of Stafford). Stafford Borough has previously raised significant concerns to this proposal, the role it would play in sustainably meeting Birmingham's housing needs and the lack of evidence on how to mitigate impacts on local infrastructure.	Not stated	No	No	Stafford Borough Council and SSDC have an agreed SoCG that addresses Duty to Cooperate matters.  No change proposed.
Walsall Council	STA24-049-01	3.6	Note that the duty to cooperate paper submitted as part of the evidence base for the local plan includes a statement of common ground with Walsall. It is marked as draft but it has not been endorsed either by Walsall's officers or members.	Not stated	Not stated	Not stated	SoCG between the Council and Walsall Council has been agreed.
City Wolverhampton Council	STA24-012-01	3.6	Engagement with the Plan process has taken place on an individual basis, and through the Association of Black Country Authorities (ABCA), in the context of the Council's involvement in the Black Country Plan (BCP). Following the dissolution of the BCP each Black Country authority agreed to prepare individual Local Plans. The Wolverhampton LDS was brought into effect in February 2024, confirming the commitment of the Council to continue to prepare an up-to-date Local Plan in a robust and timely manner. It remains the case that there is a significant level of unmet housing and employment land need arising in Wolverhampton which the South Staffordshire Local Plan should	Yes	No	Yes	Comments noted.

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			<p>seek to respond to in a positive manner.</p> <p>CWC welcome the opportunity to comment on the Plan and confirm our active and positive engagement in the various stages of preparation of the Local Plan. We also welcome the cooperative engagement with South Staffordshire Council throughout. The strategic approach set out in the Plan towards meeting unmet housing and employment needs arising in Wolverhampton is supported, and we consider that the Duty to Cooperate has been met.</p>				
Sandwell Council	STA24-038-01	3.6	<p>LATE SUBMISSION</p> <p>Acknowledge that Sandwell MBC (SMBC) and South Staffordshire District Council (SSDC) have been working together constructively on planning issues of mutual interest and that this is expected to continue. Expectation that, as the Sandwell Local Plan (SLP) moves towards Regulation 19 consultation and the South Staffordshire Local Plan (SSLP) moves towards Submission, SMBC and SSDC will aim to reach agreement on all relevant issues and reflect this agreement in complementary Statements of Common Ground to support each Submission Plan;</p>	Yes	No	Yes	<p>Comment noted.</p> <p>SoCG between the Council and Sandwell Council now agreed.</p>
Lower Penn Parish Council	STA24-028-01	3.6	<p>LATE SUBMISSION</p> <p>LPPC do not consider that having to accommodate neighbouring authorities' unmet housing need, due to the Duty to Cooperate, amounts to the 'Exceptional Circumstances' required to justify development in the Green Belt. The NPPF now supports this, stating there is no need for greenbelt boundaries to be reviewed or changed when plans are being prepared.</p> <p>We would also like to state that we do not think that the Black Country Authorities have demonstrated that they have examined fully all other reasonable options for meeting its identified need. The Black Country Authorities, in particular Wolverhampton, our neighbour, have not even assessed their city centre where many derelict and disused buildings lie empty. All neighbouring counties' brownfield sites need to be utilised before greenbelt land is released both in their own areas and in South Staffs. The CPRE brownfield report identified 99,600 dwellings that could be built in the West Midlands on brownfield sites in 2021.</p>	Not stated	Yes	Not stated	<p>The justification for exceptional circumstances is set out in the Council's Exceptional Circumstances Topic Paper 2024.</p> <p>The Council has not seen any compelling evidence to suggest that the Black Country councils have not taken a robust approach to considering their land supply; and it is therefore evident that a sizable shortfall remains.</p> <p>No change proposed.</p>
Marrons Planning for Boningale Homes	AGT24-027-02-01	3.6	<p>South Staffordshire must be able to demonstrate that it has engaged and worked with neighbouring authorities, alongside their existing joint working arrangements, to satisfactorily address cross-boundary strategic issues, and the requirement to meet any unmet housing needs. This is not simply an issue of consultation but a question of effective cooperation. We consider that the Council, on the available evidence have failed to demonstrate sufficient cross-boundary working.</p>	No	No	No	<p>A contribution to unmet needs of authorities in the Housing Market Area is being provided in addition to meeting our own housing needs, in accordance with what the council considers to be an appropriate strategy. Ongoing cooperation with Duty to Cooperate bodies has taken place and informed the plans strategic approach, as detailed in our Duty to Cooperate Topic Paper.</p>

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							Emerging Statements of Common Ground are being prepared with all neighbouring and HMA authorities to reflect the cooperation to date and our respective positions.
CPRE West Midlands Regional Group	STA24-014-02	3.6	The housing study (see attached) identifies a surplus supply of 2,292 compared to requirements. This surplus could be used to reduce the level of housing identified on greenfield sites or reassess the scale of housing available to meet the needs arising in the Black Country.	Not stated	Not stated	Not stated	The Council does not recognise the supply figures quoted. The supply position with proposed allocations is set out in Table 8 of the Local Plan.
National Highways	STA24-032-01	3.6	For any developments which have an impact on neighbouring local authorities, we advise a joined-up approach in which National Highways, South Staffordshire Council and the other local authorities attend joint meetings with the future developer or applicants. This will ensure that the interests of all parties are protected, and a combined solution is derived. National Highways would like to work to develop and draft a Statement of Common Ground (SoCG) to summarise the ongoing discussions and co-operation between the South Staffordshire Council and National Highways. The document would include details of how the Councils have responded positively to comments and representations made by National Highways as part of the Local Plan review process, the approach to collaborative joint working on the preparation of additional evidence, and agreement on where future collaborative work will focus.	Not stated	Not stated	Not stated	Comments noted.
Home Builders Federation	STA24-024-02	3.6	<p>HBF is disappointed that the DTC statement simply sets out what has happened but gives no explanation of what has been agreed upon and why. Merely noting that there is an unmet need, does nothing to address it. HBF is supportive of the need for the Council to have an up-to-date Local Plan which is why it is so disappointing that there is a total lack of collective thinking around how the unmet need of the whole Housing Market Area will be addressed.</p> <p>The Plan is rowing back on the housing numbers planned for in the earlier Regulation 19 consultation. The result is a plan to deliver less housing than was already being planned for, which itself was not enough. HBF is very disappointed that in the midst of a Housing Crisis the Council is changing direction in this way. We do not agree with the Council's characterisation of the changes resulting from the changes to the NPPF or the Council's response to it. There is nothing in the changed NPPF that would force the Council to change tack in this way. If the Council remained committed to meeting their own housing needs and contributing to wider growth agenda of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) there is nothing in the NPPF changes that would prevent them from continuing on the path proposed in the original Reg 19</p>	No	No	No	<p>A contribution to unmet needs of authorities in the Housing Market Area is being provided in addition to meeting our own housing needs, in accordance with what the council considers to be an appropriate strategy. Ongoing cooperation with Duty to Cooperate bodies has taken place and informed the plans strategic approach, as detailed in our Duty to Cooperate Topic Paper. Emerging Statements of Common Ground are being prepared with all neighbouring and HMA authorities to reflect the cooperation to date and our respective positions.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p>

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			<p>consultation.</p> <p>The change of tack proposed in the new Reg 19 consultation fails to take the longer-term view needed on the future growth in South Staffordshire. The failure of the joint-working and cross-boundary collaboration between the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) LPAs including South Staffordshire failing to recognise and address the scale of housing need, does not result in the housing need disappearing, it simply makes the situation worse as the unmet housing needs of the region continue to grow. The Plan does not help to address the national housing crisis.</p>				The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).
Marsh, T	RES24-141-02	3.6	<p>There is a clear need to support neighbouring authorities, however the way in which this is conducted is not clear. Do the authorities identify what they have done themselves to find locations for housing? Do they publish their findings in detail? What sites have they identified as not suitable and for what reasons? Is South Staffordshire able to do their own research into areas that those authorities may have missed and propose further sites that should be considered?</p>	Not stated	Not stated	Not stated	The Council has not seen any compelling evidence to suggest that other authorities in the Housing Market Area have not taken a robust approach to considering their land supply; and it is therefore evident that a sizable shortfall remains.
Stantec for L&Q Estates Limited	AGT24-041-01-04	3.6	<p>The Council's Duty to Cooperate Topic Paper 2024 refers to the GBBCHMA Development Needs Group Draft Statement of Common Ground dated August 2022, but the SoCG includes information that is no longer correct, including referring to the Council's 4,000 home contribution and does not consider evidence from the emerging Birmingham Local Plan so has not been kept up to date, in line with national requirements. It is evident that not all authorities are in agreement with the matters set out in the SoCG, given it was drafted nearly two years ago and only half of the constituent members have signed it. It can therefore only ever hold limited weight as a document.</p> <p>It is therefore irrational that South Staffordshire Council can suggest the SoCG constitutes evidence that the Strategic Growth Study requires updating. Furthermore, if the Council is of the view that the Strategic Growth Study is out of date, it should have produced updated evidence to support this position, rather than pursuing an unevidenced Local Plan.</p> <p>The DtC Topic Paper references an October 2023 setting out that SSDC was considering revising its strategy however these appear absent - these letters must be published in advance of the Local Plan EIP. Without this evidence, it cannot be said that the Council has demonstrated that it has passed the duty to cooperate.</p>	Not stated	Not stated	No	<p>The Duty to Cooperate Topic Paper 2024 sets out a record of cross boundary working including establishing the 2022 GBBCHMA development needs group SoCG. It is acknowledged that our April 2024 Regulation 19 consultation post-dates that August 2022 SoCG so some of the information may be superseded, however SoCGs can only ever reflect a snapshot in time.</p> <p>The Strategic Growth Study (SGS) 2018 quantified the shortfall and made spatial recommendations based on this in 2017/18, and so is now 6 years old and so it is the council's position that this is out of date evidence. This is supported by the fact that there is a commitment to update the SGS across the HMA, including from South Staffordshire Council.</p> <p>The Council is committed to updating the Strategic Growth Study and is currently progressing this with members of the GBBCHMA Development Needs Group to inform future plan making across the market area. It is not considered that this could have been done to inform this current emerging Local Plan without significant delay to plan progress.</p>



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							Statements of Common Ground with neighbouring authorities have continued to be progressed and are set out in an addendum to the Duty to Cooperate Topic Paper which form part of the submission documents. The Duty to Cooperate Topic Paper 2024 omitted the Council's October 2023 Duty to Cooperate letter and responses, however provided a summary. The full letter and responses have now been incorporated into the Duty to Cooperate Topic Paper addendum which forms part of the submission documents.
Turley Associates for Bellway Homes	AGT24-042-01-02  AGT24-042-01-04	3.6	Please refer to our previous representations made in December 2022 on this matter at Appendix 1. It is not clear how the HMA authorities intending to submit before June 2025 can meet the duty to cooperate when leaving such a significant scale of unmet need. The previous Publication Plan demonstrates that South Staffordshire has suitable and deliverable capacity to deliver at least 4,000 dwellings towards the unmet need. The reduced contribution is not reflective of the functional links between SS and the Black Country. SS is encouraged to revisit the contributions proposed and reengage with the wider HMA authorities.	No	No	No	<p>A contribution to unmet needs of authorities in the Housing Market Area is being provided in addition to meeting our own housing needs, in accordance with what the council considers to be an appropriate strategy. Ongoing cooperation with Duty to Cooperate bodies has taken place and informed the plans strategic approach, as detailed in our Duty to Cooperate Topic Paper. Emerging Statements of Common Ground are being prepared with all neighbouring and HMA authorities to reflect the cooperation to date and our respective positions.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p>
Lichfields for St Philips	AGT24-026-02-01	3.6	Unmet housing needs – St Philips welcomes the Council's commitment to addressing part of the GBBCHMA unmet need through the Local Plan review. Despite the changes within the NPPF it remains entirely appropriate and in accordance with the NPPF to make provision for the cross-boundary needs. St Philips has significant concerns regarding the proposed contribution to the unmet need following the reduction in the contribution. The Council does not propose to address Birmingham's needs at all,	No	No	No	Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the

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			or meaningfully contribute to the BCAs. St Philips considers that the Council is seeking to defer rather than deal with the issue, and it is critical that the Council makes an appropriate contribution towards the unmet need now as the needs are acute. There are sites throughout the District that could sustainably contribute to addressing more of the unmet need – with the site at Wolverhampton Road, Wedges Mills being one.				<p>plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>Wedges Mills is a Tier 5 settlement in the Rural Services and Facilities Audit 2021, indicating poor access to services and facilities, and therefore is not a sustainable location for growth.</p>
Lichfields for Taylor Wimpey	AGT24-026-03-01	3.6	Welcomes the Council's commitment to addressing part of the GBBCHMA unmet need through the Local Plan review. Despite the changes within the NPPF it remains appropriate and in accordance with the NPPF to make provision for the cross-boundary needs. Taylor Wimpey has significant concerns regarding the proposed contribution to the unmet need following the reduction in the contribution. The Council has suggested that there is not sufficient evidence regarding the quantum of unmet needs and this uncertainty provides adequate justification to defer this issue to a future Local Plan review – this is fundamentally incorrect. Taylor Wimpey considers the planned contribution is insufficient in the context of the severeness of the unmet needs. We are concerned the Council is planning to defer dealing with this issue when it should be addressed immediately. We encourage utilising a functional relationship-based approach which would result in a contribution of c.8,650 dwellings and could be sustainably accommodated in South Staffordshire.	Not stated	No	Not stated	<p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>Considering the shortfall across the HMA through coordinated joint evidence base it the preferable approach. The Council is committed to updating the Strategic Growth Study and is currently progressing this with members of the GBBCHMA Development Needs Group to inform future plan making across the market area. It is not considered that this could have been done to inform this current emerging Local Plan without significant delay to plan progress.</p>
Savills UK Ltd for St Modwen & JM Holt	AGT24-038-04-01	3.6-3.7	Consider that Sandwell MBC is included when assessing the needs of the FEMA due to location on the M6M5 corridor. We recommend that the priority is to seek an agreement to the SoCG by all of the relevant local planning authorities, to provide certainty in relation to both employment and housing requirements for the plan period. Suggest SoCG is updated to reflect outcome of the 2024 WMSESS once published.	Yes	No	No	<p>A SoCG between South Staffordshire FEMA authorities and Sandwell MBC is now agreed and forms one of the submission documents.</p> <p>The updated West Midland Strategic Employment Sites Study (2024) was only published in September 2024, following the April 2024 consultation on the Council's Regulation 19 plan.</p>

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							In the FEMA SoCG it was agreed by all parties that given the stage of plan making the authorities subject to the Statement are at, it is considered appropriate that the findings of the study will be considered through future Local Plan Reviews.
WSP UK Ltd for Seddon Homes	AGT24-045-01-02	3.6 - 3.7	<p>Previous representations to the Local Plan Publication Stage in 2022, submitted by WSP on behalf of Seddon Homes, raised concerns about the lack of cross-boundary working and the failure to account for cross-boundary sites. Whilst there is an acknowledgement in paragraphs 3.6 and 3.7 that the Council has been working collaboratively with neighbouring authorities on cross-boundary issues, it seems like this has been focused on meeting unmet needs from the Greater Birmingham Housing Market Area (GBHMA) or unmet employment needs. However, the GBHMA doesn't include Stafford and there is no reference to any cross-boundary working with Stafford with regards to the delivery of housing.</p> <p>The suggestion isn't that South Staffordshire take on additional housing numbers as part of the Ash Flats site coming forward for development, just that there is a joined-up approach which enables housing to be maximised on the land within Stafford with the ability to then deliver open space, landscaping and ecological enhancements across the remainder of the site. The Ash Flats site forms a logical extension to Stafford Town with defensible boundaries that would not result in urban sprawl across the open countryside. These physical boundaries extend into South Staffordshire, therefore, containing the development of the site.</p> <p>Having part of the site allocated for housing and the remainder in the open countryside would be at odds with one another and therefore Until all cross-boundary issues such as this have been considered and addressed, the Duty to Cooperate cannot be said to have been fully complied with.</p>	Not stated	No	No	<p>Stafford Borough Council and SSDC have an agreed SoCG that addresses Duty to Cooperate matters.</p> <p>It is understood that Seddon Homes are promoting a site largely in Stafford Borough however with a small part of the landholding in South Staffordshire within the floodplain. It is understood that Seddon Homes wish to have this piece land in South Staffordshire allocated so that it can form part of the open space to serve the proposed residential scheme in Stafford Borough. This is not considered necessary in order for the South Staffordshire Local Plan to be sound. The site is of a scale that open space can be delivered in the Stafford Borough site, outside of the floodplain, and the Council has received no requests for the council to allocate this site to support the delivery of the land in Stafford Borough.</p> <p>No change proposed.</p>
RPS Group for Persimmon Homes	AGT24-037-02-01	3.6-3.7; Table 2; 5.9-5.11	<p>The Council accepts that addressing the unmet housing needs of the wider housing market area is a 'challenge' (Table 2). The Council also acknowledged that the scale of this problem is 'increasing' (para 5.10). The contribution is being reduced from 4,000 to just 640 dwellings out of a total unmet need or shortfall of 106,654 dwellings from the Black Country and Birmingham covering the period up to 2039 (para 5.10).</p> <p>RPS has reviewed the DTC TP and would draw the Inspector to the following on matters relating to unmet housing need:</p>	Not stated	Not stated	No	<p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home</p>



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			<ul style="list-style-type: none"> <li>• South Staffordshire District Council (SSDC) had accepted and planned to accommodate a proposed contribution of 4,000 dwellings and had consulted on this in their Publication (Pre-Submission) Plan in autumn 2022.</li> <li>• However, in October 2023 SSDC wrote to all other authorities within the GBBCHMA setting out that South Staffordshire was revising its strategy and asked for their initial views on this revised approach</li> <li>• Neither the letters sent to it neighbours in the wider HMA in October 2023 nor any correspondence, if it exists, has been appended to the DTC TP.</li> <li>• The evidence presented by SSDC points to a Statement of Common Ground dated August 2022 across GBBCHMA, however SSDC has effectively reneged on this previous commitment.</li> <li>• Appendix C of the DTC TP provides a draft South Staffordshire Functional Economic Market Area Draft Statement of Common Ground Position at April 2024. This SOCG has no signatories.</li> <li>• Appendix D of the DTC TP includes a number of draft Statements of Common Ground with individual adjoining and HMA local authorities. None of these more recent draft SOCGs have been formally agreed at Member level within those authorities.</li> </ul> <p>Based on this review, it is clear that limited progress has been made across the GBBCHMA on how the shortfall in housing need emanating from Birmingham and Black Country will be addressed. Progress on formal sign off of the statements of common ground (dealing with both housing and employment) remain outstanding with no clear timetable for when these will be signed.</p> <p>SSDC's shift away from their previously agreed position on the shortfall undermines the previous progress made to that point. Substantial reduction in the scale of contribution towards the unmet need from the GBBCHMA (which SSDC accept is increasing) at such a late stage in the plan review process does not represent 'constructive' engagement as required under the Duty.</p> <p>On this basis, it cannot be said that engagement to date on addressing the unmet housing need matter has been effective and undermines the need for a positively prepared and justified strategy, contrary to national policy. The approach to addressing unmet housing need is not soundly-based and does not meet the duty to cooperate.</p>				<p>contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>Statements of Common Ground with neighbouring authorities have continued to be progressed and are set out in an addendum to the Duty to Cooperate Topic Paper which form part of the submission documents. The Duty to Cooperate Topic Paper 2024 omitted the Council's October 2023 Duty to Cooperate letter and responses, however provided a summary. The full letter and responses have now been incorporated into the Duty to Cooperate Topic Paper addendum which forms part of the submission documents.</p>
Emery Planning for Wain Estates	AGT24-016-02-01	3.6-3.7	Whilst the Strategic Growth Study may require updating, the Council acknowledges that there is a very significant shortfall, and furthermore that the extent of the unmet need is only increasing. In that context it is totally illogical to arrive at a	Not stated	No	No	A contribution to unmet needs of authorities in the Housing Market Area is being provided in addition to meeting our own housing needs, in accordance with what the council considers to be

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			<p>reduced contribution of 640 dwellings. If the Strategic Growth Study needs updating then the onus is on the Council to do that immediately, given the context of the Local Plan Review which is to grapple with this issue. Our client is promoting an omission site that lies outside of the Green Belt. These non-Green Belt options have not been maximised in the chosen strategy.</p> <p>The SoCG has only been signed by 9 out of 17 parties despite being prepared almost two years ago and retains the reference to a contribution of 4,000 dwellings from the Council. The proposed contribution towards meeting GBBCHMA's housing needs is wholly unjustified and does not demonstrate effective cooperation. We therefore do not consider that the Publication Local Plan complies with the Duty to Cooperate and further work must be undertaken to resolve this.</p>				<p>an appropriate strategy. Ongoing cooperation with Duty to Cooperate bodies has taken place and informed the plans strategic approach, as detailed in our Duty to Cooperate Topic Paper. Emerging Statements of Common Ground are being prepared with all neighbouring and HMA authorities to reflect the cooperation to date and our respective positions.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>It is acknowledged that our April 2024 Regulation 19 consultation post-dates that August 2022 SoCG so some of the information may be superseded, however SoCGs can only ever reflect a snapshot in time.</p> <p>The Council is committed to updating the Strategic Growth Study and is currently progressing this with members of the GBBCHMA Development Needs Group to inform future plan making across the market area. It is not considered that this could have been done to inform this current emerging Local Plan without significant delay to plan progress.</p>
Stansgate Planning for Payne Hicks Beach Trust Corporation Ltd	AGT24-040-01-01	3.6-3.7	<p>The level of housing need across the GBBCHMA has not reduced in the time between the two versions of the Publication Plan. The current Publication Plan April 2024 will not therefore deliver anywhere near the level of new homes required to address the unmet need and this need for housing will remain unaddressed.</p> <p>This does not represent a positive approach to plan making or effective joint working on this important strategic matter. South Staffordshire are seeking to bypass the allocation of sufficient</p>	No	No	No	<p>A contribution to unmet needs of authorities in the Housing Market Area is being provided in addition to meeting our own housing needs, in accordance with what the council considers to be an appropriate strategy. Ongoing cooperation with Duty to Cooperate bodies has taken place and informed the plans strategic approach, as detailed in our Duty to Cooperate Topic Paper. Emerging Statements of Common Ground are</p>

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			<p>sites to deliver their proportionate level of additional housing need arising within the GBBCHMA and do not therefore meet the legal compliance with the Duty to Co-operate.</p> <p>The draft SoCG does not provide an agreed position in respect of housing supply within the South Staffordshire District or the level of unmet housing need arising from the GBBCHMA that should be addressed within the South Staffordshire District.</p> <p>Whilst there has been engagement with surrounding local planning authorities in the preparation of the revised Publication Plan it is not evidenced that this has produced a positively prepared and effective plan that meets the requirements of the Duty to Co-operate and therefore the tests of soundness.</p>				<p>being prepared with all neighbouring and HMA authorities to reflect the cooperation to date and our respective positions.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p>
Rapleys LLP for Vistry Group	AGT24-035-01-07	3.6-3.7	<p>The 640 unmet need provision is acknowledged. However, it does not in any way negate the fact that the 640 is a considerable reduction from the 4,000 previously proposed and at time when housing need and the unmet need from neighbouring authorities has only increased. Vistry is supportive of the principle and sentiment of providing for unmet need, but not the level of provision. This is because the quantum of housing for which the Council is planning is wholly insufficient at least as far as the unmet need is concerned. The need does not disappear because of changes in the NPPF. There has been no movement or published update to the GBBCHMA Housing Supply and Need Position Paper despite increasing shortfalls of delivery, collaboration on the Black Country Plan has broken down and each of the three BC authorities is 'going it alone'.</p> <p>Fundamentally, paragraphs in the NPPF on DTC and protection of Green Belt effectively produce a conflicting position that Council's like South Staffordshire have to navigate.</p> <p>Notwithstanding this, Paragraph 27 of the NPPF still requires the SoCG to be agreed, to be produced and publicly made available. This is still outstanding and therefore, Vistry consider that the Plan is unsound on the basis that it is not 'positively prepared,' which paragraph 35 (a) of the NPPF</p>	Not stated	No	No	<p>A contribution to unmet needs of authorities in the Housing Market Area is being provided in addition to meeting our own housing needs, in accordance with what the council considers to be an appropriate strategy. Ongoing cooperation with Duty to Cooperate bodies has taken place and informed the plans strategic approach, as detailed in our Duty to Cooperate Topic Paper. Emerging Statements of Common Ground are being prepared with all neighbouring and HMA authorities to reflect the cooperation to date and our respective positions.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p>

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Brazenell, K	RES24-022-06	3.7	South Staffs can only meet the needs of its neighbours if it doesn't build on greenbelt land.	Not stated	Not stated	Not stated	Comments noted.
Carter, M	RES24-034-01	3.7	Agree with meeting OAN and supporting neighbouring areas where this does not result in Green Belt release.	Not stated	Not stated	Not stated	Comments noted.
McEwen, S	RES24-148-01	3.7	Agree that the district should plan for its own objectively assessed need for housing and contribute to the needs of neighbouring areas as long as that does not result in Green Belt release.	Not stated	Not stated	Not stated	Comments noted.
Moore, S	RES24-153-01	3.7	Agree that the district should plan for its own objectively assessed need for housing and contribute to the needs of neighbouring areas as long as that does not result in Green Belt release.	Yes	Yes	Yes	Comments noted.
Home Builders Federation	STA24-024-02	3.7	<p>Paragraph 22 of the NPPF requires that "strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger-scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery". HBF would wish to see the South Staffordshire Plan take this approach, and it is very disappointing it does not.</p> <p>This version of the South Staffordshire plan seems to be a deliberate attempt to scale back on the delivery of housing that the Council had already accepted was needed and sustainable in the previous Regulation 19 consultation. Failure to address the wider housing needs of the HMA and the refusal to consider further Green Belt release serves to show the Council is failing to positively plan for the future of its area, as national planning policy and guidance requires it to do.</p> <p>HBF cannot see how adopting a constraint-based approach to plan-making for South Staffordshire in the midst of a housing crisis is appropriate. We have made the same comments to all of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) LPAs whose individualistic approach to plan-making means that the wider housing needs of the region continue to grow.</p>	No	No	No	<p>It is not considered necessary for the plan to look further ahead by at least 30 years as all sites can be delivered within the proposed plan period to 2041.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p>
Goldfinch Town Planning Services	AGT24-020-01-01	3.8	We object to the continued poor quality of the evidence base being used to support Local Plan preparation.	No	No	No	The council consider its evidence base to be proportionate and robust.
Home Builders Federation	STA24-024-02	3.8	HFB cannot see how the evidence under pinning the previous Reg 19 plan has changed to an extent that failing to meet the already identified housing needs is a reasonable approach or	No	No	No	The previous spatial strategy set out in the 2022 version of the plan included a 4000-home contribution to unmet needs, with the findings of

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			<p>represents a positively prepared plan for South Staffordshire. In adopting a new "local need" approach to housing, with a minimal contribution to the wider housing needs of the area, the Plan seems to be in conflict with itself. The evidence base behind the previous Reg 19 consultation remains, and this was supportive of the previous approach where South Staffordshire was able to make a greater contribution to the wider housing needs of the HMA, enabling it to benefit from the value of current and future inward investment, attract new jobs and provide a range of employment land to ensure a range and choice of sites for that sector.</p> <p>It will be essential for the deliverability of the Plan for the Council to demonstrate that the infrastructure needed to support new development remains viable with the new significant lower levels of housing growth now being planned for in this new Reg 19 consultation.</p>				<p>the 2018 Strategic Growth Study (SGS) the evidential basis for this approach. The SGS 2018 quantified the shortfall and made spatial recommendations based on this in 2017/18, and so is now 6 years old and so it is the council's position that this is out of date evidence. This is supported by the fact that there is a commitment to update the SGS across the HMA, including from South Staffordshire Council.</p> <p>The vast majority of sites in the plan are unconstrained greenfield sites. The two largest sites with the most significant infrastructure requirements have been subject to site specific viability testing and are subject to live planning applications, and therefore policy complaint deliverability is not a concern.</p>
Savills UK Ltd for St Modwen & JM Holt	AGT24-038-04-01	3.8-3.9	<p>Still consider that the employment need identified in the Publication Plan is an underestimation as evidenced by the Savills Industrial and Logistics (I&amp;L) Needs Assessment – Addendum Note (May 2024) (Appendix 2) and the Savills Industrial and Logistics Needs Assessment (February 2024) (Appendix 1) accompanying these representations.</p> <p>SSDC Updated EDNA has limited regard to current day market drivers which we consider has led to an underestimation of 'true' market demand for I&amp;L uses in South Staffordshire and has limited regard to market signals. EDNA update also does not take account of demand lost due to supply constraints.</p>	Yes	No	No	<p>The Council's 2022 Economic Development Needs Assessment (EDNA) and 2024 EDNA update form the evidence base for determining our employment land needs. The EDNA does consider both labour demand and past trends when arriving at a robust objectively assessed need figure for the district.</p> <p>The EDNA uses the 'Growth Scenario' as a basis for the district's future employment needs, and the EDNA demonstrates that the objectively assessed need identified is broadly aligned with sustaining a reasonable assessment of recent past trends in delivery including the pattern of supply achieved across strategic and non-strategic locations for economic development.</p> <p>The EDNA evidence represents an appropriate basis for plan-making in accordance with national policy and guidance. The Council's evidence base provides outputs directly applicable to the Plan Area for the purposes of undertaking the supply/demand balance and calculating potential contributions towards neighbours' unmet needs while recognising the wider context for economic development in the district.</p> <p>The EDNA Update is supported by a benchmarking exercise which demonstrates that its recommendations on need provide a robust measure of local labour demand and components of gross needs (including margins for flexibility</p>



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							accounting for increased take-up on strategic sites and frictional vacancy) to support the future supply of land and floorspace.
Goldfinch Town Planning Services	AGT24-020-01-01	3.10	The Sustainability Appraisal (SA) process is not fit-for-purpose and sufficiently robust and is clearly unsound and is not legally compliant. The SA therefore fails various tests of 'Soundness' for Local Plan preparation as reinforced within paragraph 35 (indents b, c and d) of the Revised NPPF (December 2023).	No	No	No	The council consider its Sustainability Appraisal to be proportionate and robust and meets its legal requirements.
Marrons Planning for Boningale Homes	AGT24-027-02-01	3.10	<p>While we endorse the overall strategy found in the SA, there are still certain problems with its implementation, including an identified inconsistent approach to site selection that has arisen as a result of multiple iterations of the SA having being produced.</p> <p>Concerns relating to the legal compliance and soundness of the Plan overall are as follows: The revised strategy is considered to prioritise avoiding Green Belt release over fulfilling a justified housing requirement When there are other sustainable development opportunities available, the approach unnecessarily relies on two key development sites to provide a sizable amount of the housing requirement the strategy will not, therefore, deliver a sustainable pattern of development in accordance with the provisions of the NPPF.</p> <p>Areas of noncompliance are as follows: The assessment of proposed allocations and scoring of reasonable alternatives has been inconsistent. For there to be compliance with Article 5 of the SEA Directive, the public must be presented with an accurate picture of what reasonable alternatives there were to the proposed policies and why they were not considered to be the best option. Given that there have been multiple iterations of the SA, we do not consider that the public will have a clear understanding of the reasonable alternatives both in terms of strategy and specific sites.</p>	No	No	No	<p>The council consider its Sustainability Appraisal to be proportionate and robust and meets its legal requirements. The SA is intentionally an iterative process with options tested as the plan is developed. The final SA to accompany the Regulation 19 consultation draws together all these options/reasonable alternatives and clearly references back to earlier iterations where necessary.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>The identification of the two strategic site allocations reflects their sustainable location and the villages capacity to accommodate a significant level of growth. This is balanced with more limited growth in less sustainable locations as set on in Policy DS5.</p>
Fisher, R	RES24-070-02	3.10	<p>No one on the estate wants this development as it will cause congestion and reduce quality of life, as well as ruining the character of the village.</p> <p>More consultation should be undertaken. Brownfield should be used and not countryside. Use other sites that don't cause</p>	No	No	No	<p>Comments noted.</p> <p>Throughout plan preparation the council has consulted in line with its statement of community involvement, considerably exceeding the minimum level of consultation required.</p>

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			congestion in an already overdeveloped village.				Suitable brownfield sites have been prioritised where they have been assessed as suitable through the housing site assessment topic paper. The apportionment of growth is set out in Policy DS5 and supported by evidence set out in the Spatial Strategy Topic Paper 2024.
Historic England	STA24-023-01	3.10	<p>We are supportive of a specific indicator for cultural heritage and an assessment of the key issues that heritage faces as a result of the development pressure within the Borough. We welcome a section on the consideration of reasonable alternatives within the report.</p> <p>We note the comments in Table N.11 on page N37 in the SEA Volume I Report and consider that ensuring that appropriate mitigation measures that have been identified throughout the HESA Reports, are stated within the Plan under relevant site policies to minimise the harm to heritage both individually and cumulatively.</p> <p>Table 6.5 from page 46 cites a '0' effect for heritage for all sites bar 036c. It is disappointing that there are no sites which have incurred a 'positive' for the historic environment. Given the comments in the HESA 2022 Report are in the SA/SEA Report Volume I we consider it is likely that there are residual negative effects for the historic environment, which makes the appropriate mitigation measures necessary.</p>	Not stated	Not stated	Not stated	<p>Comments noted.</p> <p>Recommended mitigation measures from the Historic Environment Site Assessment (HESA) 2022 are summarised in the site specific proformas (e.g. Appendix C) under 'key requirements', with cross reference to a requirement to meeting the mitigation requirements of the HESA 2022. Given the length of some of these mitigation measures, it was not considered appropriate to include them verbatim in the plan.</p>
RPS Group for Persimmon Homes	AGT24-037-02-07	3.10	<p>RPS does not consider the findings against a number of SA objectives to be soundly based.</p> <p>Under SA Objective 4, RPS would question the relevance of including consideration of Green Belt under this objective, given the fact that Green Belt is a strategic designation based on five purposes, none of which relate to landscape factors. RPS does not consider the Council's conclusion that development on this site would cause 'moderate harm' to the Green Belt purposes soundly based. In relation to landscape sensitivity, a previous Planning Inspector for application 06/00638/OUT concluded that the site would not have a material effect on the landscape character of the area.</p> <p>Under SA Objective 5, the effects are overstated when taking into account the potential for mitigation. Air and noise effects from the M54 were considered in the earlier planning application where both the Planning Inspector and the Secretary of State concluded that this would not represent a barrier to development. The assessment has also not taken account of the decision made the Government in April 2022 to allow the</p>	No	No	Not stated	<p>The SA scoring is considered correct in line its proposed methodology, reflecting the fact that the SA forms a high-level assessment.</p> <p>The SA does not in itself identify proposed allocations but is a consideration in site selection alongside other planning consideration as detailed in the Council's Housing Site Assessment Topic Paper (2024).</p> <p>Lepus Response –</p> <p>All reasonable alternative sites, including Site 170, have been evaluated in the SA pre- and post-mitigation using the same methodology and scoring system.</p> <p>The precautionary principle has been applied, for example where ALC Grade 3 has potential to be classified as Grade 3a without specific soil survey data.</p>

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Respondent	Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Council's Proposed Action/Response
			<p>construction of a new M54/M6/M6 Toll/ A460 link road that will reduce traffic flows. For water, RPS highlights that the illustrative masterplan shows that any built development would set back from existing watercourses in the vicinity and within the site and, notably, a sustainable urban drainage system will be designed and installed as part of development on the site.</p> <p>Under SA Objective 6, RPS disputes the score given for the site. Firstly, the site has been used for cultivation more many years and so, for the vast majority of the site, it is disputed whether the soils are, in fact, of 'ecologically valuable' given its current use. No evidence is presented by the Council which shows the site to be of Grade 3a value, and thus classed as 'BMV' land. In light of the above, RPS contends that the site should not be scored 'minor negative' under this objective without sufficient evidence to support the Council's claim.</p> <p>Under SA Objective 10, RPS disputes the assertion that the site would have a minor negative impact with respect to access to bus stops. 800 meter threshold is used in Manual for Streets and there are a number of bus services within this distance. Furthermore, the use of a 400m threshold differs from those used by the Council as part of its rural services audit. Specifically, the Rural Services and Facilities Audit (RSFA), which applies a proximity 'range' of between 800 to 2,000m (see paragraph 3.17 of that report). RPS contends the SA methodology for this objective is not fit for purpose as a reasonable measure of significant effects. Consequently, when applying the national standards and those used elsewhere in the Council's evidence base, as a measure of access to local services, site 170 would clearly score 'minor positive'. RPS also disputes the Council's suggestion that site 170 is located beyond 2km of a convenience store, and thus would score 'minor negative'. RPS contends that site 170 would, in overall terms, have a 'minor positive' impact on access to transport and accessibility.</p> <p>Under SA Objective 11 RPS disputes the basis for the criteria identified in the SA methodology for distance to education. The 1.5km threshold applied under this objective equates to a distance of less than one mile (0.9 miles). However, both national and local guidance applies a wider distance threshold (3 miles) in measuring appropriate distances between home and school locations. RPS considers the distance thresholds applied under this SA objective to be arbitrary in nature and are not based on any local assessment of what would constitute an appropriate distance. Consequently, the score for Site 170 under this objective should be adjusted to 'minor positive'.</p>				<p>Site-specific details, such as current and anticipated traffic flows to and from sites, or additional masterplan information, have not been factored into the high-level SA assessments, as these details are not available on a consistent basis across all reasonable alternatives and may introduce bias.</p> <p>The SA is an iterative process; the findings at each stage have been fed back to the Council to aid their decision-making and selection/rejection of sites, in line with the SEA Regulations.</p>



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			<p>Under SA Objective 12, it is wrong to suggest the site has unreasonable access to local employment opportunities when the RSFA using the same Hansen scores identified site 170 as having 'medium access to employment'. RPS contends that the SA has wrongly applied the findings of the RSFA in light of Featherstone's accessibility to local employment. Accordingly, the Council should identify the correct effect consistent with the SA methodology. The correct score in RPS' view, as defined in the methodology, is 'minor positive'.</p> <p>It is unclear how the SA has informed the site selection process given that the reasons for why sites have been rejected have been inserted into the SA from elsewhere in the evidence base. This approach is therefore contrary to the approach required in national policy. The SA should therefore be updated in response to the issues raised and Site 170 (Land east of Brookhouse Lane) allocated.</p>				
Marrons Planning for Bloor Homes	AGT24-027-01-04	3.10	For Site 283, the key determinant in the Sustainability Appraisal and Site Assessment is the potential for major negative impacts in relation to landscape criteria due to Green Belt harm. It is not appropriate for the Green Belt Study to have been used as a criteria for the Sustainability Appraisal rather than the Landscape Sensitivity assessment only, which would conclude differently in relation to the assessment of Sites. The SA should be amended to be consistent with the Housing Site Selection Topic Paper and vice versa.	No	Yes	No	<p>The Housing Site Assessment Topic Paper does already take account of the findings of the Sustainability Appraisal's assessment of sites, and records where major positive or negative effects are predicted.</p> <p>Lepus Response – The Landscape Sensitivity Assessment and the Green Belt Assessment are two distinct landscape evaluations and cannot be used interchangeably, but both are relevant criteria to consider within the wider topic of landscape as set out in SA Objective 4.</p> <p>All reasonable alternative sites have been evaluated in the SA using the same methodology, including against all criteria used for the appraisal within SA Objective 4 (landscape). The SA findings have been fed back to the Council and taken into account in the Housing Site Assessment Topic Paper, which highlights in particular the identified major positive and negative impacts.</p>
Avison Young for Beard, G	AGT24-004-01-02	3.10	Appendix I of the SA part of the land holdings within the Bradshaws Estate was scored wrongly in respect to landscape, Green Belt and education. The proposed strategic allocations at Bilbrook and Penkrige 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.	No	No	No	<p>The SA scoring is considered correct in line its proposed methodology, reflecting the fact that the SA forms a high-level assessment.</p> <p>Whilst it is accepted that the allocation at Perton (site ref 239) is outside the ideal catchment of education, the fact that it is non-Green Belt land means that the site is in accordance with the</p>

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							Council's spatial strategy and on balance is considered suitable for allocation.
RPS Group for IM Land	AGT24-037-01-06	3.10 (Appendix A)	<p>RPS has reviewed this latest SA and has a number of soundness concerns.</p> <p>Our first concern is that the selection of Option G is based on discounting Options A and H on the ground that delivering a suitable housing mix would be challenging under these options (SA report, para 5.3.8 / E.3.3.4). Such an approach is spurious because more homes would be deliverable under Options B (7,030 dwellings) and Option C (9,130 dwellings) which the SA concludes are the 'best performing options' (SA report, para 5.3.9).</p> <p>The selection of Option G would clearly undermine this objective, and so its preference is confusing and illogical.</p> <p>The second concern is that Option G also includes reference to consideration of locational specific factors, no other residential growth option includes such a specific location-based criteria, instead they simply focus on overall scale options (for local and wider HMA needs).</p> <p>This would suggest the preference for Option G (4,726 dwellings) has been skewed in order to fit with the preferred strategy, rather than being an appraisal carried out in a 'policy off' context, contrary to the regulations. Given the lack of consistency evident here, RPS would question whether the SA, and the preference for Option G, has in fact been carried out in a fair and transparent process.</p> <p>SA, Appendix F provides details of the assessment of Spatial Options. The Council has selected Option I as it's preferred spatial option.</p> <p>Our soundness concern with this approach is that the SA favours 'Option H' as best performing against the SA objectives overall (SA, Appendix F, F11.14.5). Nonetheless, the SA discounts Option H because it does not include any contribution towards unmet need from GBBCHMA. On this basis, Option I is favoured instead because it does include a contribution and so performs better under SAO 7 (Housing).</p> <p>RPS would agree that option H should be discounted for the reasons given by the Council. However, all the other discounted options include higher housing contributions towards the wider unmet need from the BBCHMA than proposed under Option I (SHSTP 2024, section 4.14 The Spatial Housing Options A – I).</p>	Not stated	No	Not stated	<p>It is not the role of the SA to determine the appropriate level of growth to plan for, but just to inform it. No growth options have been discounted through the SA process.</p> <p>It is clear that the distinction in the SA scoring for Option A and H is down to the fact that both options would not include any provisions to meet other authorities' needs within the HMA.</p> <p>Option G is described in Table 5.1 of the March 2024 Regulation SA report (volume 2) and simply describes the level of growth proposed 'A minimum requirement of 4,726 dwellings between 2023-2041'.</p> <p>It is not the role of the SA to determine the appropriate spatial strategy but just to inform it. No spatial options have been discounted through the SA process. It is evident that most spatial options perform broadly similar against the SA objectives, however on the whole, the SA concluded that Option I could be identified as the preferable option. Spatial Options have been considered in more detail through the Spatial Housing Strategy Topic Paper, where the justification for proceeding with Option I is set out.</p>

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			Revisit SA in light of the soundness concerns set out in this submission, then reconsult prior to submission of the second Reg 19 Plan for examination.				
Natural England	STA24-033-01	3.11	The Habitat Regulation Assessment has been unable to rule out impacts on Habitats Sites due to a lack of evidence so the plan is not legally compliant. Further evidence needs to be collected and the Habitats Regulation Assessment should assess potential air quality impacts. Natural England will continue dialogue with the Partnership including South Staffordshire Council and proposes to record progress on the air quality issues through a statement of common ground with the Council. Agree with the conclusion of the Habitat Regulation Assessment that adverse effects on their integrity, alone or in-combination, cannot be ruled out due to lack of evidence.	No	No	Yes	The Council has prepared an air quality evidence base and agreed a Statement of Common Ground with Natural England which is currently in the process of being signed. This confirms the ongoing cooperation on this issue and confirms we can now rule out adverse effects on site integrity of all relevant designated sites. An update to our HRA has been produced to confirm this.
Stafford Borough Council	STA24-043-01	3.11 (Appendix A)	The Habitat Regulations Assessment of future housing growth in South Staffordshire District will need to be addressed in order to provide mitigation measures for the Cannock Chase Special Area of Conservation (SAC) together with other relevant SACs / Ramsar sites in the locality. The Borough Council will continue to work alongside South Staffordshire District through the Cannock Chase SAC Partnership on suitable measures.	Yes	No	Yes	Mitigation measures for the Cannock Chase SAC are secured through Policy NB6, and is an approach agreed with the SAC partnership, including Natural England.  In relation to air quality, the Council has prepared an air quality evidence base and agreed a Statement of Common Ground with Natural England which is currently in the process of being signed. This confirms the ongoing cooperation on this issue and confirms we can now rule out adverse effects on site integrity of all relevant designated sites. An update to our HRA has been produced to confirm this.
City Wolverhampton Council	STA24-012-01	3.14	The SSLP is supported by an updated Infrastructure Delivery Plan (IDP) addressing a range of infrastructure issues including transport, schools, health facilities, community services, open space and retail. This has been developed through consultation with infrastructure providers and neighbouring authorities, including the City Council. Strategic infrastructure opportunities are identified, including a First School to serve Codsall / Bilbrook and A41 junction improvements at Perton to alleviate congestion. If these opportunities are delivered as planned, and the City Council is appropriately involved in all cross-boundary transport planning, it is considered that the three allocations listed in our representation are themselves unlikely to have a negative impact on Wolverhampton infrastructure.	Yes	No	Yes	Comments noted.
Goldfinch Town Planning Services	AGT24-020-01-01	3.14	We have continued concerns that the Infrastructure Delivery Plan (IDP) which is being used to heavily influence and provide the critically important supporting planning policy foundations to underpin Local Plan Review policy preparation, is still continuing to take forward highly questionable and undeliverable proposals	No	No	No	The IDP clearly identifies infrastructure necessary to mitigate proposed allocations. Its role is also to identify infrastructure projects that are coming forward outside the Local Plan process (e.g. some highway schemes) and potential projects that

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			and projects which have no realistic prospect or likelihood of ever being delivered.				may reflect a community aspiration.
National Highways	STA24-032-01	3.14	Paragraph 5.6 of the Infrastructure Delivery Plan (IDP) cites the discussions held between National Highways and South Staffordshire Council (SSC) with regards to the transport evidence base. Whilst the principle of the approach in assessing the traffic impacts has been agreed, there remain technical details to discuss and agree. We are committed to ongoing engagement with SSC and the local highways authority in order to finalise the technical details of this methodology. We appreciate that the IDP will be updated regularly to accommodate the infrastructure schemes in the pipeline. In terms of any mitigation identified as being necessary to maintain the free flow and safety of the SRN, we will seek to enter into Section 278 agreements with developers to deliver specific improvement schemes on the SRN where they are found to be necessary.	Not stated	Not stated	Not stated	Comments noted.  A transport SoCG between National Highways, Staffordshire County Council highways and City of Wolverhampton highways is in the process of being agreed.
PlanIT Planning & Development for Messer's Jenks and Letts	AGT24-034-03-02	3.15	Mismatch between the pool of employment opportunities in the District and the working age population. There is also a mismatch between existing housing stock and future housing need.  'The Issues and Challenges for South Staffordshire' section of the Plan should be re-drafted to reflect the fact that the housing and employment requirements are an opportunity for the local economy.	Yes	Yes	Yes	The issue is noted, and the balance of housing and employment has been considered through the Council's Housing Market Assessment and Economic Development Needs Assessment. Table 3 and 4 of the Issues and Challenges already acknowledges the positive impacts of delivering a variety of homes to meet the needs of the local community and the need to plan to provide employment opportunities and meet identified needs.  No change proposed.
PlanIT Planning & Development for Amadis Holdings Ltd	AGT24-034-01-02	3.15	Mismatch between the pool of employment opportunities in the District and the working age population. There is also a mismatch between existing housing stock and future housing need.  'The Issues and Challenges for South Staffordshire' section of the Plan should be re-drafted to reflect the fact that the housing and employment requirements are an opportunity for the local economy.	Yes	Yes	Yes	The issue is noted, and the balance of housing and employment has been considered through the Council's Housing Market Assessment and Economic Development Needs Assessment. Table 3 and 4 of the Issues and Challenges already acknowledges the positive impacts of delivering a variety of homes to meet the needs of the local community and the need to plan to provide employment opportunities and meet identified needs.  No change proposed.
PlanIT Planning & Development for Hampton Oak Developments Ltd	AGT24-034-02-02	3.15	Mismatch between the pool of employment opportunities in the District and the working age population. There is also a mismatch between existing housing stock and future housing need.  'The Issues and Challenges for South Staffordshire' section of	Yes	Yes	Yes	The issue is noted, and the balance of housing and employment has been considered through the Council's Housing Market Assessment and Economic Development Needs Assessment. Table 3 and 4 of the Issues and Challenges already acknowledges the positive impacts of delivering a

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			the Plan should be re-drafted to reflect the fact that the housing and employment requirements are an opportunity for the local economy.				variety of homes to meet the needs of the local community and the need to plan to provide employment opportunities and meet identified needs.  No change proposed.
Home Builders Federation	STA24-024-02	3.15	<p>As the SWOT analysis in Table 2 in para 3.15 acknowledges South Staffordshire faces an ageing demographic, reliance on neighbouring areas for its economic health and access to employment. However, the opportunities for growth to generate inward investment and prosperity is noted.</p> <p>In HBF's view this should lead to a positive plan seeking to deliver housing and employment to ensure South Staffordshire can benefit from these opportunities. It is therefore disappointing that this version of the plan is rowing back on previous ambitions, which in HBF's view were in themselves already not ambitious enough.</p> <p>HBF acknowledge the changes to the NPPF have removed the "requirement" for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated. However, as this section of the Plan notes authorities may still choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified. HBF believes the current housing crisis, the scale of unmet need within the GBBCHMA and the failure of joined up strategic planning in both Birmingham and the Black Country provide just such exceptional circumstances that justify further green belt releases. We would request the Council revisits its approach to this matter in order to an enable the South Staffordshire new Local Plan to be positively prepared, justified and effective.</p> <p>HBF would request changes are made to this section to join the different elements of spatial planning together. In order to be positively prepared, effective and justified, it is important that the plan views South Staffordshire in the round, considering housing and employment, growth and jobs together. These factors are inextricably linked and the failure to proactively plan for more housing will impact negatively on the area's ambitions for growth. Similarly, the failure to do more to contribute to meeting the wider housing needs of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA), will negatively impact on the economic aspirations of the wider area.</p>	No	No	No	<p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>Our EDNA 2024 considered the relationship between labour supply and employment growth and found that the strong evidence for labour demand, alongside any additional flexibility in supply, means that growth in the workplace population is likely to be proportionally high relative to the current total for persons living and working in South Staffordshire. There is presently very weak evidence that these characteristics would be changed by a specific increase in housing provision to support future jobs growth.</p>
PlanIT Planning & Development for Miller Homes	AGT24-034-04-02	3.15	Table 2 confirms there is a demographic in-balance which will lead to a decrease in the size of the employment pool from residents in South Staffordshire. There is an identified mismatch between the potential size of the employment pool and the new job opportunities which will be created.	Yes	Yes	Yes	Our EDNA 2024 considered the relationship between labour supply and employment growth and found that the strong evidence for labour demand, alongside any additional flexibility in supply, means that growth in the workplace



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			Table 3 advises there is a mismatch between existing housing stock and future housing need. There is a requirement to provide smaller residential properties for younger families and older people wishing to downsize and free up family sized accommodation. The housing pressures and need to support economic growth should be recognised as an opportunity for the local economy.				population is likely to be proportionally high relative to the current total for persons living and working in South Staffordshire. There is presently very weak evidence that these characteristics would be changed by a specific increase in housing provision to support future jobs growth.
Pegasus Group for Persimmon Homes	AGT24-032-04-01	Table 2	Whilst the importance of brownfield sites is recognised, this balanced alongside strategic growth within open countryside and through Green Belt release is necessary to overcome those weaknesses identified by SSDC. It is important that emphasis is placed within the strategic objectives to deliver previously safeguarded sites such as Land at Cherrybrook Drive.	Not stated	No	Not stated	The preferred strategy does deliver all suitable and suitable and sustainable brownfield sites and allocates all suitable safeguarded land sites as allocations. This delivers a balanced strategy that prioritising non-Green Belt land, whilst not avoiding Green Belt release altogether, as allowed for by national policy. The Council has chosen to limit Green Belt release to its most sustainable Tier 1 settlements within walking distance of railway station, which the Council considers to be a justified approach.  It is not considered necessary to refer to delivering safeguarded land in the strategic objectives.
Pegasus Group for Taylor Wimpey	AGT24-032-08-02	Table 2	Whilst the importance of brownfield sites is recognised, this balanced alongside strategic growth within open countryside and through Green Belt release is necessary to overcome those weaknesses identified by SSDC.	Not stated	No	Not stated	The preferred strategy does deliver all suitable and suitable and sustainable brownfield sites and allocates all suitable safeguarded land sites as allocations. This delivers a balanced strategy that prioritising non-Green Belt land, whilst not avoiding Green Belt release altogether, as allowed for by national policy. The Council has chosen to limit Green Belt release to its most sustainable Tier 1 settlements within walking distance of railway station, which the Council considers to be a justified approach.
Marsh, T	RES24-141-03	Table 2	The strengths are generic; however the weaknesses will have a greater impact should further houses be built without the correct infrastructure.  The demographic imbalance is due to the nature of the village (Wombourne) and the residents it caters for. The job opportunities are not great enough to attract a younger demographic. The transport services are very poor, there are very few reasonably priced or free social services that a younger person would require. That could assist with health, child, youth care and entertainment.	Yes	No	No	The plan will deliver the necessary infrastructure to support growth in line with Policy EC11 in the Local Plan. Access to employment and public transport access have been considered through the Rural Services and Facilities Audit 2021 in arriving at the conclusion that Wombourne should be identified as a Tier 2 settlement.
Pegasus Group for Clowes Developments	AGT24-031-02-01	Table 2	Despite acknowledging a higher-than-average aging population and decline in families and working age residents, SSDC does not seek to directly address this issue by prioritizing the delivery	Not stated	No	No	The NPPF and PPG confirm that authorities should first determine the number of homes required over the plan period, and then consider the extent

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			of family homes and ensuring the housing needs of the working age population are met across the Plan period. Contributing a larger proportion of homes to the HMA would assist in addressing this issue, improving affordability of homes.				to which the identified needs of specific groups can be addressed in the area. To this end, the Housing Market Assessment has modelled the future population profile and assessed what housing types are needed to meet the needs of this population. There is no requirement within national policy or guidance to rebalance the projected population in any way.  The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).  No change proposed.
Pegasus Group for St Philips	AGT24-032-07-02	Table 2	Despite acknowledging a higher-than-average aging population and decline in families and working age residents, SSDC does not seek to directly address this issue by prioritizing the delivery of family homes and ensuring the housing needs of the working age population are met across the Plan period. Contributing a larger proportion of homes to the HMA would assist in addressing this issue, improving affordability of homes.	Yes	No	Not stated	The NPPF and PPG confirm that authorities should first determine the number of homes required over the plan period, and then consider the extent to which the identified needs of specific groups can be addressed in the area. To this end, the Housing Market Assessment has modelled the future population profile and assessed what housing types are needed to meet the needs of this population. There is no requirement within national policy or guidance to rebalance the projected population in any way.  The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).  No change proposed.
Pegasus Group for Richborough Estates	AGT24-032-05-02	Table 2	Despite acknowledging a higher-than-average aging population and decline in families and working age residents, SSDC does not seek to directly address this issue by prioritizing the delivery of family homes and ensuring the housing needs of the working age population are met across the Plan period. Contributing a larger proportion of homes to the HMA would assist in addressing this issue, improving affordability of homes.	Yes	No	Yes	The NPPF and PPG confirm that authorities should first determine the number of homes required over the plan period, and then consider the extent to which the identified needs of specific groups can be addressed in the area. To this end, the Housing Market Assessment has modelled the future population profile and assessed what housing types are needed to meet the needs of this population. There is no requirement within national policy or guidance to rebalance the projected population in any way.

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Respondent	Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Council's Proposed Action/Response
							The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).  No change proposed.
Marsh, T	RES24-141-04	Table 3	Agree that there needs to be smaller, more affordable housing, and those that can assist the elderly and disabled. However house prices are clearly going up and generally remain that way. If an elderly person moves out of their home to a smaller one, the only person who will be able to afford their house is someone on a high wage. Which defeats the purpose of building these homes in the first place.	No	No	No	The Council has assessed the types of housing needed over the plan period to address these issues through the Housing Market Assessment. Policy HC1 requires the provision of smaller properties, particularly within the market housing mix to meet the needs of smaller and younger households. Policy HC3 (and HC6 and HC7) will also secure the provision of affordable housing for those that are unable to access housing on the open market.  No change proposed.
Savills UK Ltd for St Modwen & JM Holt	AGT24-038-04-01	Table 4	A windfall employment policy should be added to the Plan, to allow other employment sites to come forward if the market supports them. This should be in the form of a separate policy or additional wording to an existing policy. Please refer to our responses to Policy DS3 and EC3.	Yes	No	No	The plan already makes provision to meet our own employment land needs as well as a contribution to unmet needs of the wider Functional Economic Market Area (FEMA). Given this, it is not considered necessary to amend the plan to include an additional policy that explicitly supports unallocated employment windfall development, as such development could still be acceptable, subject to being in accordance with relevant policies in the plan.  No change proposed.
Watt, J	RES24-246-04	Table 4	Lack of jobs around Site 036c, land south of Stafford forces people to commute. More residents will only increase traffic on already congested roads.  Site 036c should remain as agricultural land.	No	No	No	Engagement throughout plan preparation has taken place with Local Highways Authority (Staffordshire County Council). They have not indicated that the impact of the proposed allocation would not generate any significant impacts on the transport network or highway safety that cannot be mitigated in line with paragraph 114 d of the NPPF.  No change proposed.
Fisher, R	RES24-070-03	Table 4	To preserve an areas distinctiveness, stop building on it. This is a rural community and like it this way. There is a beautiful variety of nature and walks and this development will undoubtedly detract from this character.	No	No	No	Comments noted.  Throughout plan preparation the council has consulted in line with its statement of community



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Respondent	Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Council's Proposed Action/Response
			Residents should be made aware of consultation and able to comment offline. Brownfield should be used and not countryside.				involvement, considerably exceeding the minimum level of consultation required. Consultation is widely publicised, and residents are able to put representations in writing via a letter.
Terry-Short, S	RES24-235-01	Table 4	Recent timetable changes now severely reduce the frequency of peak services and introduces a longer journey time on the Shrewsbury to B'ham rail line. How can this reduced service support current needs let alone future housing expansion.	Not stated	Not stated	Not stated	Trains times and frequency are regularly subject to change, however, there remains regular services from the districts tier 1 settlements allowing access via sustainable transport to neighbouring urban areas.
<b>CHAPTER 4: VISION AND OBJECTIVES</b>							
RPS Group for Persimmon Homes	AGT24-037-02-02	4.1	<p>Strategic Objective 2 sets the commitment to meet the housing needs of the district whilst making a proportionate contribution towards the unmet needs of Greater Birmingham and Black Country (GBBC) HMA. In principle, RPS has no fundamental objection with this approach.</p> <p>RPS notes the plan period is now 2018-2039, or 21 years; it was 2018-2028 or 20 years in the Regulation 18 Preferred Options document consulted on previously. By extending the plan period forward by one year, the local housing need for South Staffordshire has increased by one year's growth (at least 241 dwellings) the contribution towards the unmet needs of the Black Country has not increased in the same way. RPS sees no reason why the proportionate contribution to the unmet need should not be extended forward by one year in line with the local housing need increase.</p>	Yes	No	Not stated	<p>This representation appears to be referring to the 2022 Regulation 19 Publication with reference to a 2018-2039 plan period.</p> <p>The Council considers that adoption by early 2026 is ambitious but realistic. It is accepted that if this is not the case then it will impact on the end of the plan period.</p>
Harris Lamb for Folkes	AGT24-022-01-01	4.1	Strategic Objective 2 seeks to meet housing and employment needs of the District whilst making a proportionate contribution towards the unmet needs of Greater Birmingham. What is meant by a 'proportionate' contribution in the context of picture across the HMA is not clear, but 640 dwellings does not begin to scratch the surface.	Not stated	No	No	<p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p>
Harris Lamb for Heyfield Developments	AGT24-022-02-01	4.1	Strategic Objective 2 seeks to meet housing and employment needs of the District whilst making a proportionate contribution towards the unmet needs of Greater Birmingham. What is meant	Not stated	No	No	Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in

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Respondent	Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Council's Proposed Action/Response
Ltd			by a 'proportionate' contribution in the context of picture across the HMA is not clear, but 640 dwellings does not begin to scratch the surface.				our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.  The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).
Pegasus Group for Richborough Estates	AGT24-032-05-02	4.1	The Plan's vision and objectives should be amended to reflect the need to meet both the present and future housing requirements, including those pressures arising through the Duty to Cooperate with neighbouring authorities, in particular the GBBCHMA.	Yes	No	Yes	The plans vision is an intentionally succinct statement that answers what the district will look like at the end of the plan period, including providing thriving new places where people can live.  The policies in the plan will enable the strategic objectives to be achieved to deliver this overarching vision.  Meeting development needs (including unmet needs of neighbouring areas) already forms part of Strategic Objective 2.  No change proposed.
Pegasus Group for Clowes Developments	AGT24-031-02-01	4.1	The Plan's vision and objectives should be amended to reflect the need to meet both the present and future housing requirements, including those pressures arising through the Duty to Cooperate with neighbouring authorities, in particular the GBBCHMA.	Not stated	No	No	The plans vision is an intentionally succinct statement that answers what the district will look like at the end of the plan period, including providing thriving new places where people can live.  The policies in the plan will enable the strategic objectives to be achieved to deliver this overarching vision.  Meeting development needs (including unmet needs of neighbouring areas) already forms part of Strategic Objective 2.  No change proposed.
Pegasus Group for St Philips	AGT24-032-07-02	4.1	The Plan's vision and objectives should be amended to reflect the need to meet both the present and future housing requirements, including those pressures arising through the Duty to Cooperate with neighbouring authorities, in particular the	Yes	No	Not stated	The plans vision is an intentionally succinct statement that answers what the district will look like at the end of the plan period, including providing thriving new places where people can

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Respondent	Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Council's Proposed Action/Response
			GBBCHMA.				live.  The policies in the plan will enable the strategic objectives to be achieved to deliver this overarching vision.  Meeting development needs (including unmet needs of neighbouring areas) already forms part of Strategic Objective 2.  No change proposed.
Pegasus Group for Persimmon Homes	AGT24-032-04-01	4.1	It is noted that the Vision remains broadly the same as that presented in the Core Strategy – it remains relevant and is broadly supported. However, the Plan's vision and objectives should be amended to reflect the need to meet both the present and future housing requirements, including those pressures arising through the Duty to Cooperate with neighbouring authorities, in particular the GBBCHMA. There needs to be greater emphasis placed on a Vision which is locally relevant and picks up the key issues and challenges.	Not stated	No	Not stated	The plans vision is an intentionally succinct statement that answers what the district will look like at the end of the plan period, including providing thriving new places where people can live.  The policies in the plan will enable the strategic objectives to be achieved to deliver this overarching vision.  Meeting development needs (including unmet needs of neighbouring areas) already forms part of Strategic Objective 2.  No change proposed.
Pegasus Group for Taylor Wimpey	AGT24-032-08-02	4.1	It is noted that the Vision remains broadly the same as that presented in the Core Strategy – it remains relevant and is broadly supported. However, the Plan's vision and objectives should be amended to reflect the need to meet both the present and future housing requirements, including those pressures arising through the Duty to Cooperate with neighbouring authorities, in particular the GBBCHMA. There needs to be greater emphasis placed on a Vision which is locally relevant and picks up the key issues and challenges.	Not stated	No	Not stated	The plans vision is an intentionally succinct statement that answers what the district will look like at the end of the plan period, including providing thriving new places where people can live.  The policies in the plan will enable the strategic objectives to be achieved to deliver this overarching vision.  Meeting development needs (including unmet needs of neighbouring areas) already forms part of Strategic Objective 2.  No change proposed.
Clewley, G & M	RES24-042-03 RES24-042-04	4.1	Education Site 036c Not legally compliant to the NPPF as it will not promote healthy and safe communities due to a lack of school places to meet the needs of new or existing people. Plan makes no mention of education provision for this site and	No	No	No	Engagement throughout plan preparation has taken place with the School Organisation Team (SOT) at Staffordshire County Council. They have not indicated that the impact of the proposed allocation is incapable of being mitigated through financial contributions in line with Policy HC15.

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			<p>only identifies two other schemes across the district Contravenes the councils own policy of cooperation by proposing the scheme in a reduced form than the one it opposed in 2017. School places are under even greater strain now as they were then</p> <p>Health Services for site 036c Fails in legal duty to cooperate with other local planning authorities and the county council on strategic matters Plan makes no reference to ensuring sufficient access to GPs and health centres for the new development SSDC contravening its own policy of cooperation by now promoting a scheme it opposed in 2017</p>				<p>Engagement throughout plan preparation has taken place with Staffordshire and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical Commissioning Group). They have not indicated that the impact of the proposed allocation is incapable of being mitigated through financial contributions in line with Policy HC14.</p> <p>Ongoing cooperation with Duty to Cooperate bodies has taken place and informed the plans strategic approach, as detailed in our Duty to Cooperate Topic Paper. Emerging Statements of Common Ground are being prepared with all neighbouring and HMA authorities to reflect our respective positions.</p> <p>No change proposed.</p>
Lichfields for St Philips	AGT24-026-02-01	4.1	<p>Vision – details on the vision in paragraphs 2.25 – 2.28 of the full representation (Wedges Mills). St Philips strongly contends that a higher housing requirement reflecting the critical need for a larger contribution to the unmet need will deliver the Council's priorities. Details on loss of economic growth, environmental enhancements and social inclusion as a result of the reduction in housing allocations are detailed in paragraph 2.29 of the full representation. Significantly reducing the number of homes delivered is not the long-term solution to addressing issues such as social infrastructure, climate change and inclusive economic growth.</p>	No	No	No	<p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p>
National Highways	STA24-032-01	4.1	<p>National Highways agree in principle to the vision and objectives of the draft Local Plan.</p>	Not stated	Not stated	Not stated	<p>Comments noted.</p>
Home Builders Federation	STA24-024-02	4.1	<p>The vision is unsound as it is not positively prepared HBF believes the vision for South Staffordshire should explicitly refer to the need for new development and growth and meeting the housing needs of the area in full.</p>	No	No	No	<p>The plans vision is an intentionally succinct statement that answers what the district will look like at the end of the plan period, including providing thriving new places where people can live.</p> <p>The policies in the plan will enable the strategic objectives to be achieved to deliver this overarching vision.</p> <p>Meeting development needs (including unmet</p>

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Respondent	Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Council's Proposed Action/Response
							needs of neighbouring areas) already forms part of Strategic Objective 2.  No change proposed.
Adams, M	RES24-002-01	4.1	The stated vision will not be apparent in the village. Land that was Green Belt has been released for housing, giving the message that land is only classified as Green Belt until the authority decides to re-classify it.	Not stated	Not stated	Not stated	Comments noted.
JMS Planning for Wolverhampton Halfpenny Green Airport	AGT24-023-01-01	4.1	JMS Planning supports the overall vision of the Local Plan, especially in supporting the rural communities that play an important role in the socio-economic development of the LPA. This is set out further in strategic objective 7, which again is fully supported; the diversification of rural businesses is vital to ensure that the vision is executed across the plan period.	Not stated	Not stated	Not stated	Comments noted.
Savills UK Ltd for St Modwen & JM Holt	AGT24-038-04-02	Table 6	Strategic Objective 6 is supported. The additional allocation at Junction 13, M6 will assist in meeting this objective and is strongly supported.	Yes	No	No	Comments noted.
Knight Frank for Pland Estates Ltd	AGT24-024-01-01	Table 6	Strategic Objective 1 - To contribute to making the Local Plan sound Strategic Objective 1 should be reworded to "Protect the Green Belt and Open Countryside ensuring that where Green Belt release is proposed in sustainable locations, mechanisms are in place to secure compensatory improvements to the environmental quality and accessibility of the remaining Green Belt."  Strategic Objective 2 - the last part of the last sentence that currently reads "with a particular focus on the district's most sustainable Tier 1 settlements' should be removed to contribute to making the plan sound and to reflect that there are further sustainable locations in lower tier settlements.	Yes	No	Yes	Green Belt release through the Local Plan is limited to sustainable locations (around Tier 1 settlement), and it is not considered necessary to clarify that Green Belt release is limited to sustainable locations in the Strategic Objective.  Under the preferred strategy there is a particular focus on Tier 1 settlements to deliver new housing growth as these are the districts most sustainable settlements as evidenced by the Rural Services and Facilities Audit 2021.
RCA Regeneration for Barberry Developments	AGT24-036-01-02	Table 6	Disagree with Strategic Objective 1 in its aim to require "compensatory improvement to the environmental quality and accessibility of the remaining Green Belt". We question how this will be mandated and what level of viability testing has been undertaken to ensure that development is not stymied due to the requirement.  Agree with Strategic Objectives 2, 3, 4, 5, 6, 7, 8 and 13. Agree with Strategic Objective 9 and 10 However, it is also here that meeting the Duty to Cooperate is essential in identifying and delivering cross-boundary infrastructure which would facilitate unmet housing need from neighbouring authorities.  Strategic Objective 11 and 12 are laudable, however it is our view that the building regulations regime is the best way to set	No	No	No	The NPPF is clear that compensatory improvements are required where Green Belt release is proposed. It is therefore considered that Policy DS2 is necessary, and without it, could render Green Belt allocations non-compliant with the NPPF. Strategic Objective 1 reflects this and is considered appropriate.  The Climate Change Topic Paper 2024 and The Sustainable Construction Policy 2024 documents set out the justification for the policy approach to meeting Strategic Objectives 11 and 12.



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Respondent	Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Council's Proposed Action/Response
			standards for energy performance in new buildings.				
RCA Regeneration for Seven Capital	AGT24-036-03-02	Table 6	<p>Disagree with Strategic Objective 1 in its aim to require "compensatory improvement to the environmental quality and accessibility of the remaining Green Belt". We question how this will be mandated and what level of viability testing has been undertaken to ensure that development is not stymied due to the requirement.</p> <p>Agree with Strategic Objectives 2, 3, 4, 5, 6, 7, 8 and 13. Agree with Strategic Objective 9 and 10 However, it is also here that meeting the Duty to Cooperate is essential in identifying and delivering cross-boundary infrastructure which would facilitate unmet housing need from neighbouring authorities.</p> <p>Strategic Objective 11 and 12 are laudable, however it is our view that the building regulations regime is the best way to set standards for energy performance in new buildings.</p>	Not stated	No	No	<p>The NPPF is clear that compensatory improvements are required where Green Belt release is proposed. It is therefore considered that Policy DS2 is necessary, and without it, could render Green Belt allocations non-compliant with the NPPF. Strategic Objective 1 reflects this and is considered appropriate.</p> <p>The Climate Change Topic Paper 2024 and The Sustainable Construction Policy 2024 documents set out the justification for the policy approach to meeting Strategic Objectives 11 and 12.</p>
RCA Regeneration for St Philips	AGT24-036-04-02	Table 6	<p>Disagree with Strategic Objective 1 in its aim to require "compensatory improvement to the environmental quality and accessibility of the remaining Green Belt". We question how this will be mandated and what level of viability testing has been undertaken to ensure that development is not stymied due to the requirement.</p> <p>Agree with Strategic Objectives 2, 3, 4, 5, 6, 7, 8 and 13. Agree with Strategic Objective 9 and 10 However, it is also here that meeting the Duty to Cooperate is essential in identifying and delivering cross-boundary infrastructure which would facilitate unmet housing need from neighbouring authorities.</p> <p>Strategic Objective 11 and 12 are laudable, however it is our view that the building regulations regime is the best way to set standards for energy performance in new buildings.</p>	Not stated	No	No	<p>The NPPF is clear that compensatory improvements are required where Green Belt release is proposed. It is therefore considered that Policy DS2 is necessary, and without it, could render Green Belt allocations non-compliant with the NPPF. Strategic Objective 1 reflects this and is considered appropriate.</p> <p>The Climate Change Topic Paper 2024 and The Sustainable Construction Policy 2024 documents set out the justification for the policy approach to meeting Strategic Objectives 11 and 12.</p>
RCA Regeneration for Richborough Estates	AGT24-036-02-02	Table 6	<p>Agree with Strategic Objectives 2, 3, 4, 5, 6, 7, 8 and 13. Agree with Strategic Objective 9 and 10 However, it is also here that meeting the Duty to Cooperate is essential in identifying and delivering cross-boundary infrastructure which would facilitate unmet housing need from neighbouring authorities.</p> <p>Strategic Objective 11 and 12 are laudable, however it is our view that the building regulations regime is the best way to set standards for energy performance in new buildings.</p>	Not stated	No	No	<p>The Climate Change Topic Paper 2024 and The Sustainable Construction Policy 2024 documents set out the justification for the policy approach to meeting Strategic Objectives 11 and 12.</p>
CBRE	AGT24-009-01-01	Table 6	<p>Strategic Objective 6: to reflect logistics as one of SSDC's key sectors:</p> <p>'Strategic Objective 6 sets out a strategy for economic</p>	Yes	No	Yes	<p>Agree that with WMI coming forward in the district reference to logistics as a key sector is appropriate.</p>

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			development. The strategy seeks to retain existing employment and fosters sustainable economic growth, encouraging inward investment and job creation in key sectors such as advanced manufacturing and logistics and providing the skills to enable residents to access these jobs.'				Proposed minor modification 002: "Strategic Objective 6: Develop an economic strategy that seeks to retain existing employment and fosters sustainable economic growth, encouraging inward investment and job creation in key sectors such as advanced manufacturing and logistics and providing the skills to enable residents to access these jobs."
Harris Lamb for Redrow Homes	AGT24-022-03-01	Table 6	RH generally support the vision set out in terms of addressing the climate emergency and creating beautiful and thriving new places in which people can live, work and enjoy leisure activities. We support Strategic Objective 3 that seeks to provide housing to meet the needs of different groups in the community, including a good range of market and affordable housing of varying sizes and tenures to meet different requirements.	Yes	Yes	Not stated	Support noted.
Pland Estates Ltd	AGT24-033-01-01	Table 6	Recommended to include 'in sustainable locations' in Strategic Objective 1 to read:  "Protect the Green Belt and Open Countryside ensuring that where Green Belt release is proposed in sustainable location....' Recommend removing 'with a particular focus on the district's most sustainable Tier 1 settlements' from Strategic Objective 2 as it should not be generalised within the Strategic Objective 2, as sustainable locations can vary within Tier 1 settlements.	Yes	No	Yes	Green Belt release through the Local Plan is limited to sustainable locations (around Tier 1 settlement), and it is not considered necessary to clarify that Green Belt release is limited to sustainable locations in the Strategic Objective.  No change proposed.
Pegasus Group for Richborough Estates	AGT24-032-05-02	Table 6	Strategic Objective 1 lacks clarity and does not define the exceptional circumstances for release of Green Belt land as part of its strategy. It should be made clear that the need to identify land for growth and development over the Plan period, and beyond, means that there are exceptional circumstances arising which have required a full & detailed Green Belt boundary review.  Strategic Objective 2 could be strengthened in meeting the needs of both existing and new residents of the District and GBBCHMA. In determining what is considered to be a proportionate contribution to the HMA's unmet housing needs, SSDC must ensure specific consideration has been given to the district's ability to make a substantially larger contribution, and greater recognition should be given to Tier 2 and 3 settlements.	Yes	No	Yes	Exceptional Circumstances for Green Belt release are set out in the Council Exceptional Circumstances Topic Paper 2024 and it is not possible to define these succinctly within Strategic Objective 1.  Strategic Objective 2 already sets out the approach of meeting our own needs plus a proportionate contribution to wider unmet needs.  Justification for the preferred spatial strategy, including the level of growth at Tier 2 and 3 settlements is detailed in the Rural Services and Facilities Audit 2021.  No change proposed.
Pegasus Group for Clowes Developments	AGT24-031-02-01	Table 6	Strategic Objective 1 lacks clarity and does not define the exceptional circumstances for release of Green Belt land as part of its strategy. It should be made clear that the need to identify land for growth and development over the Plan period, and beyond, means that there are exceptional circumstances arising which have required a full & detailed Green Belt boundary review.	Not stated	No	No	Exceptional Circumstances for Green Belt release are set out in the Council Exceptional Circumstances Topic Paper 2024 and it is not possible to define these succinctly within Strategic Objective 1.  Strategic Objective 2 already sets out the

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Respondent	Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Council's Proposed Action/Response
			Strategic Objective 2 could be strengthened in meeting the needs of both existing and new residents of the District and GBBCHMA. In determining what is considered to be a proportionate contribution to the HMA's unmet housing needs, SSDC must ensure specific consideration has been given to the district's ability to make a substantially larger contribution, and greater recognition should be given to Tier 2 and 3 settlements.				<p>approach of meeting our own needs plus a proportionate contribution to wider unmet needs.</p> <p>Justification for the preferred spatial strategy, including the level of growth at Tier 2 and 3 settlements is detailed in the Rural Services and Facilities Audit 2021.</p> <p>No change proposed.</p>
Pegasus Group for St Philips	AGT24-032-07-02	Table 6	<p>Strategic Objective 1 lacks clarity and does not define the exceptional circumstances for release of Green Belt land as part of its strategy. It should be made clear that the need to identify land for growth and development over the Plan period, and beyond, means that there are exceptional circumstances arising which have required a full &amp; detailed Green Belt boundary review.</p> <p>Strategic Objective 2 could be strengthened in meeting the needs of both existing and new residents of the District and GBBCHMA. In determining what is considered to be a proportionate contribution to the HMA's unmet housing needs, SSDC must ensure specific consideration has been given to the district's ability to make a substantially larger contribution, and greater recognition should be given to Tier 2 and 3 settlements.</p>	Yes	No	Not stated	<p>Exceptional Circumstances for Green Belt release are set out in the Council Exceptional Circumstances Topic Paper 2024 and it is not possible to define these succinctly within Strategic Objective 1.</p> <p>Strategic Objective 2 already sets out the approach of meeting our own needs plus a proportionate contribution to wider unmet needs.</p> <p>Justification for the preferred spatial strategy, including the level of growth at Tier 2 and 3 settlements is detailed in the Rural Services and Facilities Audit 2021.</p> <p>No change proposed.</p>
Pegasus Group for Persimmon Homes	AGT24-032-04-01	Table 6	It is recognised that the Strategic Objectives are refined versions of those in the Core Strategy. This approach is broadly supported, and it is recognised that these remain relevant. Strategic Objective 2 could be strengthened in meeting the needs of both existing and new residents of the district.	Not stated	No	Not stated	<p>The plans vision is an intentionally succinct statement that answers what the district will look like at the end of the plan period, including providing thriving new places where people can live.</p> <p>The policies in the plan will enable the strategic objectives to be achieved to deliver this overarching vision.</p> <p>Meeting development needs (including unmet needs of neighbouring areas) already forms part of Strategic Objective 2.</p> <p>No change proposed.</p>
Pegasus Group for Taylor Wimpey	AGT24-032-08-02	Table 6	Strategic Objective 2 could be strengthened in meeting the needs of both existing and new residents of the District and GBBCHMA. In determining what is considered to be a proportionate contribution to the HMA's unmet housing needs, SSDC must ensure specific consideration has been given to the district's ability to make a substantially larger contribution, and greater recognition should be given to Tier 2 and 3 settlements.	Not stated	No	Not stated	<p>Strategic Objective 2 already sets out the approach of meeting our own needs plus a proportionate contribution to wider unmet needs.</p> <p>Justification for the preferred spatial strategy, including the level of growth at Tier 2 and 3 settlements is detailed in the Rural Services and</p>



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<b>Respondent</b>	<b>Ref</b>	<b>Para No.</b>	<b>Summary of Issue Raised</b>	<b>Legally compliant</b>	<b>Sound</b>	<b>Compliant with Duty to Cooperate</b>	<b>Council's Proposed Action/Response</b>
							Facilities Audit 2021. No change proposed.
Hagley Parish Council	STA24-021-01	Table 6	Hagley Parish Council welcomes the decision not to take substantial areas out of the Green Belt. It is noted that South Staffordshire proposes to provide for 640 houses beyond its own needs, contributing to modest unmet needs in Dudley and Wolverhampton.	Not stated	Not stated	Not stated	Comments noted.
Brewood Civic Society	STA24-008-02	Table 6	Brewood Civic Society supports all of the Strategic Objectives. Particularly the following: 1. Protecting the Green Belt and Open Countryside. 3. Provide housing to meet the needs of different groups in the community, 8. Protect and enhance sustainable village centres. 11. Protect and enhance the district's natural environment. 12. Ensure that our communities are resilient and adaptable to the effects of climate change. 13. Enhance the built environment, conserving and enhancing the district's heritage assets including the district's canal network.	Not stated	Not stated	Not stated	Support noted.

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**CHAPTER 5 & POLICIES DS1-DS5: DEVELOPMENT STRATEGY AND SUPPORTING TEXT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
<b>GENERAL ISSUES: CHAPTER 5 (inc specific paras references)</b>							
Clews, M	RES24-043-01	5.1	As a resident of Brewood, I wholeheartedly support the Local Plan. It's a comprehensive strategy that balances growth with environmental conservation, ensuring our town remains vibrant while preserving its unique character."	Not stated	Not stated	Not stated	Comment noted.
Darling, S	RES24-051-01	5.1	Fully in agreement.	Not stated	Not stated	Not stated	Comments noted.
Quince, J	RES24-190-01	5.1	Support this.	Not stated	Not stated	Not stated	Comments noted.
Danby, P	RES24-049-01	5.1	The protection of our green belt is key to South Staffordshire and it's why people want to live in our villages, our village life is supported by the local plan and this development is needed. Brewood has a need for affordable homes and the local plan supports that without overwhelming or over development. Recent building consultation by Boningale homes in Brewood to build 200+ homes and a care home on the green belt is not what the village needs, the overstretched doctors surgery and full schools are struggling now, anything outside our local plan now I would not support.	Not stated	Not stated	Not stated	Comments noted.
Seagrove, R	RES24-205-01	5.1	Green belt must be protected and Brewood has no capacity for extra houses and associated vehicles. It is already unsafe on the roads and pavements for all but especially children.	Not stated	Not stated	Not stated	The level of growth proposed for Brewood is considered proportionate for its status as a Tier 2 settlement. Engagement has taken place with the highway authority at Staffordshire County Council throughout plan preparation and no specific highways safety issues have been identified for Brewood.
Mullett, D	RES24-156-01	5.1	Important to have a plan, so it is understood where the village development is going, and to ensure, if not included in the plan, then no "extra" unauthorised plans can be successfully submitted.	Not stated	Not stated	Not stated	Comments noted.
Oakes, J	RES24-161-02	5.1	Protecting the Green Belt is vitally important, not only to maintain the rural character of the area but to support and nurture the environment and wildlife for future generations. So much has already been lost to WMI and housing development and we are now seeing the consequences from continued flooding and loss of wildlife in the area.	Not stated	Not stated	Not stated	Comments noted.  The preferred strategy balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.
Lower Penn Parish Council	STA24-028-01	5.1-5.4	LATE SUBMISSION Lower Penn is in essence the purpose of what greenbelt was set up to do. It checks the unrestricted sprawl of large built up areas, mainly Wolverhampton. It helps prevent neighbouring towns merging and it assists in safeguarding the countryside from encroachment. The particular area of Lower Penn Greenbelt is of vital importance in preventing urban sprawl and the retention of	Not stated	Yes	Not stated	Comments noted.

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			Greenbelt status in in this area which has three borders with the development area of Wolverhampton. In other locations, Greenbelt delivers important benefits, but in Lower Penn in particular, all five functions of the Greenbelt are delivered. Green belt in Lower Penn therefore holds significant value and land here should be retained as green belt in every possible circumstance  LPPC agree that our small hamlet and the surrounding countryside should not be included in the Local Plan because of the above reasons.				
Darling, S	RES24-051-02	5.2	Our green belt should remain protected.	Not stated	Not stated	Not stated	Comments noted.
Quince, J	RES24-190-02	5.2	Support this.	Not stated	Not stated	Not stated	Comments noted.
Carter, M	RES24-034-01	5.3	Agree council should allocated brownfield sites first.	Not stated	Not stated	Not stated	Comments noted.
Smith, K	RES24-219-01	5.3	Support the allocation of suitable brownfield sites first and push back to neighbouring authorities to do the same.	Not stated	Not stated	Not stated	Comments noted.
McEwen, S	RES24-148-01	5.3	Agree the Council should allocate suitable brownfield sites first, and push back to neighbouring authorities to do the same.	Not stated	Not stated	Not stated	Comments noted.
Moore, S	RES24-153-01	5.3	Agree the Council should allocate suitable brownfield sites first, and push back to neighbouring authorities to do the same.	Yes	Yes	Yes	Comments noted.
Chapman, J	RES24-040-01	5.3	Agree the Council should allocate brownfield sites first and should ensure that neighbouring authorities do the same.	Yes	Yes	Yes	Comments noted.
Quince, J	RES24-190-03	5.3	Support this.	Not stated	Not stated	Not stated	Comments noted.
Brazenell, K	RES24-022-07	5.3	I agree that brownfield sites should be used first both in South Staffs and in neighbouring counties before greenbelt is even considered.	Not stated	Not stated	Not stated	Comments noted.
Smith, K	RES24-219-01	5.3	Support the allocation of suitable brownfield sites first and push back to neighbouring authorities to do the same.	Not stated	Not stated	Not stated	Comments noted.
Claremont Planning Consultancy for Noakes, J	AGT24-012-01-01	5.8-5.11-5.21-5.22	The housing requirement and strategy for meeting these housing needs is flawed and does not represent an appropriate or sustainable strategy when taking into consideration the Plan-making requirements of the NPPF. Cross boundary contribution is now a token gesture. Whilst changes to NPPF were made to Green Belt (para 145), notably it did not change the tests of soundness and the requirement for plans to be positively prepared and the Council has failed to plan positively to assist in meeting cross boundary needs.  The Council's approach of focusing limited Green Belt	Yes	No	No	Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.  The housing target (incorporating the 640-home

**CHAPTER 5 & POLICIES DS1-DS5: DEVELOPMENT STRATEGY AND SUPPORTING TEXT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>development in Tier 1 locations well served by public transport is appropriate in principle, however this does not recognise opportunities on the edge of urban areas such as Wolverhampton that are also well served by public transport with good access to services. Essington Road site was dismissed previously as it was not consistent with the strategy of cross boundary growth on SUEs. As this is no longer the strategy this site should be reconsidered. it is important that this housing need figure is sufficient to appropriately accommodate the unmet needs. This must be remedied before the Plan is submitted for examination, in order to ensure that it can be demonstrated that the Plan complies with the Duty to Co-Operate and the tests of soundness.</p>				<p>contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>All urban fringe locations on the edge of the Black Country are Green Belt locations. The strategy focuses Green Belt release on the districts most sustainable Tier 1 settlement within walking distance of rail access. The broad location of the urban fringe of the Black Country does not offer the level of public transport, particularly to employment centres in the district and surrounding areas, which are present in the District's Tier 1 settlements and are therefore not considered to be well served by public transport, relying on limited bus services to access higher order services.</p>
Harris Lamb for Folkes	AGT24-022-01-01	5.9 - 5.17	<p>We do not consider that the Council has met the Duty to Cooperate and do not consider that the Publication Plan is sound. It is noted in the Council's Duty to Cooperate paper a list of Council's that South Staffordshire intends to engage with. However, a number of authorities in the HMA are excluded – Sandwell, Birmingham, Solihull, Lichfield and Stratford-upon-Avon. To meet the DtC it is imperative that these authorities are engaged to ensure a coordinated response to meeting the shortfall. Details on the HMA authorities &amp; their housing capacity can be found in the full representation.</p> <p>Previously South Staffordshire was a signatory to a Statement of Common Ground in 2022, however, South Staffordshire have reduced their contribution to the unmet need following the publication of the updated NPPF. There have been other notable changes since the signing of the SoCG including a significant increase in unmet need.</p> <p>Whilst we acknowledge the challenging position the Council finds itself in with the sensitivity to releasing Green Belt, the provision of just 640 dwellings towards meeting the identified shortfall is woefully inadequate and the level of contribution is not supported by any evidence. The shortfall represents 110,000 families/households who will go without adequate accommodation if meaningful steps are not taken to address the shortfall.</p>	Not stated	No	No	<p>A contribution to unmet needs of authorities in the Housing Market Area is being provided in addition to meeting our own housing needs, in accordance with what the council considers to be an appropriate strategy. Ongoing cooperation with Duty to Cooperate bodies has taken place and informed the plans strategic approach, as detailed in our Duty to Cooperate Topic Paper. Emerging Statements of Common Ground are being prepared with all neighbouring and HMA authorities to reflect the cooperation to date and our respective positions.</p> <p>Engagement has taken place on an ongoing basis with all GBBCHMA and neighbouring authorities.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper,</p>

**CHAPTER 5 & POLICIES DS1-DS5: DEVELOPMENT STRATEGY AND SUPPORTING TEXT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							that conformed with the preferred spatial strategy (spatial option I).
Harris Lamb for Heyfield Developments Ltd	AGT24-022-02-01	5.9 - 5.17	<p>We do not consider that the Council has met the Duty to Cooperate and do not consider that the Publication Plan is sound. It is noted in the Council's Duty to Cooperate paper a list of Council's that South Staffordshire intends to engage with. However, a number of authorities in the HMA are excluded – Sandwell, Birmingham, Solihull, Lichfield and Stratford-upon-Avon. To meet the DtC it is imperative that these authorities are engaged to ensure a coordinated response to meeting the shortfall. Details on the HMA authorities &amp; their housing capacity can be found in the full representation.</p> <p>Previously South Staffordshire was a signatory to a Statement of Common Ground in 2022, however, South Staffordshire have reduced their contribution to the unmet need following the publication of the updated NPPF. There have been other notable changes since the signing of the SoCG including a significant increase in unmet need.</p> <p>Whilst we acknowledge the challenging position the Council finds itself in with the sensitivity to releasing Green Belt, the provision of just 640 dwellings towards meeting the identified shortfall is woefully inadequate and the level of contribution is not supported by any evidence. The shortfall represents 110,000 families/households who will go without adequate accommodation if meaningful steps are not taken to address the shortfall.</p>	Not stated	No	No	<p>A contribution to unmet needs of authorities in the Housing Market Area is being provided in addition to meeting our own housing needs, in accordance with what the council considers to be an appropriate strategy. Ongoing cooperation with Duty to Cooperate bodies has taken place and informed the plans strategic approach, as detailed in our Duty to Cooperate Topic Paper. Emerging Statements of Common Ground are being prepared with all neighbouring and HMA authorities to reflect the cooperation to date and our respective positions.</p> <p>Engagement has taken place on an ongoing basis with all GBBCHMA and neighbouring authorities.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p>
Harris Lamb for Redrow Homes	AGT24-022-03-03	5.9	<p>It is noted that in the Council's Duty to Cooperate paper (April 2024) which other Councils the Council confirm it intends to engage with through the plan-making process. This includes both Dudley and Wolverhampton Councils although Sandwell is omitted. The list also excludes other Councils that are in the same HMA, of which there are 13 in total, such as Birmingham, Solihull, Lichfield and Stratford-upon-Avon. We consider it imperative that the Council seeks to engage with these other authorities in the same HMA as the Council if the housing need is going to be met. Furthermore, the Council should not be selective about which houses or need in the HMA is chosen to assist with meeting.</p> <p>The Council confirms that in the First Publication Plan it had</p>	No	No	Not stated	<p>A contribution to unmet needs of authorities in the Housing Market Area is being provided in addition to meeting our own housing needs, in accordance with what the council considers to be an appropriate strategy. Ongoing cooperation with Duty to Cooperate bodies has taken place and informed the plans strategic approach, as detailed in our Duty to Cooperate Topic Paper. Emerging Statements of Common Ground are being prepared with all neighbouring and HMA authorities to reflect the cooperation to date and our respective positions.</p> <p>Engagement has taken place on an ongoing basis</p>



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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>proposed to make 4,000 dwellings available to contribute to meeting the unmet need arising in the wider HMA, which Redrow considered was insufficient at the previous Regulation 19 consultation. However, the Council has now changed its Local Plan strategy and is now only proposing to make a contribution of 640 dwellings to meet the needs arising in the wider HMA. It is not clear whether the Council proposes to maintain its signature to the Statement of Common Ground that it signed previously. Since it was signed in 2022, the Black Country authorities have abandoned the preparation of the Black Country Plan and proceeded to prepare individual Local Plans. Notwithstanding that a token of contribution to meeting this unmet of the wider HMA is proposed, this will make no difference in addressing the 110,000 dwelling shortfall that exists. As it stands, we do not consider that the Duty to Cooperate has been fully discharged and that an appropriate strategy or level of agreement has been reached between the HMA authorities as to how the level of unmet will be met across the HMA.</p>				<p>with all GBBCHMA and neighbouring authorities.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p>
Hancher, R	RES24-095-03	5.9	<p>The duty to co-operate should only be used as a reason to meet unmet needs where the local authorities in question support South Staffordshire to mitigate the impact of the additional development, for example improving public transport to mitigate the impact of development.</p> <p>It is noteworthy that rail services in South Staffordshire are being reduced to prioritise services within the WMCA area.</p>	No	No	No	<p>Appropriate mitigation for development coming forward will be secured via planning obligations.</p> <p>No change proposed.</p>
RPS Group for IM Land	AGT24-037-01-01	5.9-5.12	<p>RPS has reviewed the DTC TP and would draw the Inspector to the following on matters relating to unmet housing need:</p> <ul style="list-style-type: none"> <li>South Staffordshire District Council (SSDC) had accepted a proposed contribution of 4,000 dwellings and had consulted on this in their Publication (Pre-Submission) Plan in autumn 2022.</li> <li>However, in October 2023 SSDC wrote to all authorities within the GBBCHMA setting out that South Staffordshire was revising its strategy and asked for their initial views on this revised approach. The DTC TP says that 'These letters and responses can be found in Appendix.'</li> <li>Neither the letters sent to its neighbours in the wider HMA in October 2023 nor any correspondence, if it exists, has been appended to the DTC TP.</li> <li>The evidence relied upon by the SSDC to demonstrate they have met the duty to cooperate is provided in the DTC TP (at Appendix A). However, this largely relates to various officer working group meetings, email correspondence between parties, and local plan consultation responses.</li> <li>The evidence does point to a Statement of Common Ground dated August 2022 across GBBCHMA and key related authorities (Appendix B of the DTC TP). This SOCG refers to the 4,000-dwelling contribution from South Staffordshire. However,</li> </ul>	Not stated	Not stated	No	<p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>Statements of Common Ground with neighbouring authorities have continued to be progressed and are set out in an addendum to the Duty to Cooperate Topic Paper which form part of the submission documents. The Duty to</p>



**CHAPTER 5 & POLICIES DS1-DS5: DEVELOPMENT STRATEGY AND SUPPORTING TEXT**

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			<p>as highlighted above, SSDC has now effectively reneged on their previous commitment and so the value of this SOCG of evidence that SSDC has met the duty must be in question. In any event, the SOCG was only signed by 9 of out 17 signatories, and so cannot be taken to formally represent a pan-HMA agreed position.</p> <ul style="list-style-type: none"> <li>• Appendix C of the DTC TP provides a draft South Staffordshire Functional Economic Market Area Draft Statement of Common Ground Position at April 2024. This SOCG has no signatories.</li> <li>• Appendix D of the DTC TP includes a number of draft Statements of Common Ground with individual adjoining and HMA local authorities, and which include commentary on strategic matters relating to the wider strategic housing and employment shortfalls. Notably, the DTC TP indicates that Wolverhampton, Dudley, Sandwell and Walsall Councils have responded to say that they are not currently in a position to agree officer drafts. None of the draft SOCGs have been formally agreed at Member level.</li> </ul> <p>Progress on formal sign off of the statements of common ground (dealing with both housing and employment) remain outstanding with no clear timetable for when these will be signed.</p> <p>SSDC's shift away from their previously agreed position on the shortfall undermines the previous progress made to that point. On this basis, it cannot be said that engagement to date on addressing the unmet housing need matter has been effective and undermines the need for a positively prepared and justified strategy, contrary to national policy. The issues set out above cannot be addressed through main modifications. If the Inspector agrees with this, the second Reg 19 Plan must be withdrawn and return to the Reg 18 stage.</p>				Cooperate Topic Paper 2024 omitted the Council's October 2023 Duty to Cooperate letter and responses, however provided a summary. The full letter and responses have now been incorporated into the Duty to Cooperate Topic Paper addendum which forms part of the submission documents.
Harris Lamb for Redrow Homes	AGT24-022-03-03	5.12	<p>The Council consider that there are exceptional circumstances to amend the Green Belt boundaries in order to meet its own needs but that these exceptional circumstances do not extend to meeting the needs in the wider HMA. RH consider that there is also sufficient justification for reviewing the wider Green Belt boundaries in order to meet additional development needs arising elsewhere.</p> <p>Green Belt land is being released to meet employment land requirements arising both in South Staffordshire but also the wider HMA. The review of Green Belt boundaries is, therefore, being selectively applied notwithstanding that there are considered to be exceptional circumstances in doing so to meet the District's own needs.</p>	Yes	No	Not stated	<p>Green Belt release is not being proposed to meet the districts employment land requirements, including the contribution to neighbouring areas, and therefore exceptional circumstances do not need to be demonstrated.</p> <p>The Council has demonstrated exceptional circumstances for Green Belt release around its most sustainable Tier 1 settlements as detailed in the Exceptional Circumstances Topic Paper 2024.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial</p>

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			<p>The Council has, therefore, undertaken a review of the Green Belt proposing to amend boundaries to meet its development needs. The extent of the Green Belt changes are such that are only intended to assist with meeting the housing needs of the District and do not extend to the unmet housing needs arising in the HMA.</p> <p>RH object to the selective application of exceptional circumstances to justify a partial review of Green Belt boundaries where they meet the Council's needs only and not those of the wider HMA notwithstanding that the scale of unmet need is significant.</p>				strategy (spatial option I).
Claremont Planning Consultancy for Noakes, J	AGT24-012-01-02	5.12-5.17	<p>Whilst the rationale for focusing new allocations at the Tier 1 settlements is understood, it is considered that this is undermined by the decision to reduce the level of growth being planned for substantially, and limiting new allocations to three settlements within the District. It is therefore considered that the spatial strategy advanced through the Plan is not robust or consistent with the requirements of the Framework to plan for sustainable patterns of development.</p> <p>In order to sustainably plan for higher levels of housing the council should revise the spatial housing distribution set out in Table 8 to include allocating a wider range of sites including small and medium sites. This should include allocations on the edge of the Black Country including land at Essington Road.</p>	Yes	No	No	<p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>The Council consider there to be a good mix of site sizes proposed for allocation from the large strategic housing allocations to small sites providing a minimum of 10 dwellings.</p>
Sandwell Council	STA24-038-01	5.12	<p>LATE SUBMISSION</p> <p>Support for the reference in the SSLP to updating the 2018 Growth Study and considering its findings through future plan-making and the Duty to Cooperate, given the evidenced housing shortfall arising in Sandwell and across the wider Greater Birmingham and Black Country Housing Market Area.</p>	Yes	No	Yes	Comments noted.
Penkridge Parish Council	STA24-036-01	5.12	<p>Are South Staffordshire Council considering following the example set by the 23 District Councils nationally and delay submission to the Secretary of State and revise the Local Plan, specifically addressing total housing and duty to cooperate numbers based on these updates.</p>	Not stated	Not stated	Not stated	Following the April 2024 Publication plan (Regulation 19) consultation the Council are proceeding to submission in line with its published Local Development Scheme (September 2023).
Birmingham City Council	STA24-004-01	5.12	<p>LATE SUBMISSION</p> <p>In consideration of changes to the NPPF which first emerged in December 2022 and adopted in December 2023, and the fact</p>	Not stated	Not stated	Not stated	<p>Comments noted.</p> <p>Justification for the council's spatial strategy and</p>

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			that the Strategic Growth Study (2018) is now out of date, options for housing growth have now been reappraised within the South Staffs Local Plan and set out in Chapter 5. Option I has resulted in the identification of sufficient land to meet South Staffs' own housing need plus a contribution of 640 dwellings towards any unmet needs of the GBBCHMA representing more than a 15% increase on the District Council's own housing needs. It is appreciated that the Local Plan Review is still seeking to contribute towards the unmet needs of the GBBCHMA through a sustainable and balanced approach which continues to support the growth of the West Midlands Conurbation which is supported. This includes release of Green Belt land, and we welcome the recognition in the Local Plan that this situation constitutes exceptional circumstances to do this, consistent with the provisions of the NPPF. However, it is disappointing that this contribution is significantly reduced compared to the previous 4,000 dwelling figure, meaning that opportunities to help meet housing shortfalls elsewhere in the HMA have been lost.				approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.  The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).
Cannock Chase District Council	STA24-010-01	5.12	Cannock Chase District Council consider the Local Plan to be sound and legally compliant and consider it has been produced in compliance with the Duty to Cooperate however, the Council has some concerns with regard to the wording around the validity of the joint evidence base. The Council have produced detailed comments on the strategy and cross boundary issues.	Not stated	Not stated	Not stated	Comments noted.
Lower Penn Parish Council	STA24-028-01	5.14	LATE SUBMISSION As a Parish Council we are and were against building on strategically important greenbelt land that helps protect against climate change and we wish this to be preserved for future generations to enjoy and have the benefit of it. We also agree with the capacity led approach (Spatial Option I) focusing growth to sustainable non-greenbelt sites and limited greenbelt development in tier 1 settlements well served by public transport.	Not stated	Yes	Not stated	Comments noted.
Brazenell, K	RES24-022-08	5.14	I agree that housing should be sited in villages with public transport links and other infrastructure.	Not stated	Not stated	Not stated	Comments noted.
Smith, K	RES24-219-01	5.14	Tier 5 villages, including Lower Penn, have no access to services and are therefore unsuitable for development.	Not stated	Not stated	Not stated	Comments noted.  Lower Penn does not include any proposed allocations.
Staffordshire County Council	STA24-044-02	5.16	The council's preferred approach to housing is Spatial Option I - a capacity-led approach focusing growth to sustainable non-Green Belt sites and limited Green Belt development in Tier 1 settlements well served by public transport. However, at paragraph 5.16 the Plan states 'Spatial Option I does not avoid Green Belt release...Spatial Option I does propose to limit Green	Yes	No	Yes	All suitable sites that align with the preferred spatial strategy (Spatial Option I) have been identified, including sites at the Tier 1 settlements. The rationale for discounting the site west of Penkrudge is set out in our Housing Site Assessment Topic Paper (2024).

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>Belt allocations to suitable sites in areas of the district best served by public transport... Local evidence shows the district's Tier 1 settlements are the areas best served by public transport in the district, particularly where these transport links offer sustainable commuting patterns into the neighbouring Black Country and Birmingham conurbation...This is expanded on further in the council's Green Belt Exceptional Circumstances Topic Paper 2024.'</p> <p>Whilst this approach only provides for a relatively small contribution to the GBHMA unmet need it does show alignment with the West of Penkridge proposal at a strategic level. Penkridge is a Tier 1 settlement; it includes a railway station and regular bus services; and 'the council has also proposed an additional amount of limited Green Belt release to the south of the village, recognising Penkridge's status as a Tier 1 settlement and the sustainability of this location compared to other areas of the district.' The West of Penkridge proposal is adjacent to the Village, potentially offers improvements to the railway station, and could therefore be seen to align with the SSDC strategic approach and offer opportunity to consider the longer term housing growth of the District and wider HMA unmet need.</p>				
Harris Lamb for Redrow Homes	AGT24-022-03-16	5.16	<p>The supporting text at paragraph 5.16 indicates that Tier 1 settlements are capable of accommodating new development as they would help facilitate sustainable commuting. In light of this point, RH note that the land at Castlecroft Farm is well located to the existing built-up edge of Wolverhampton City which would provide convenient access for residents who work in the City Centre to access opportunities present there. In terms of meeting any overspill or unmet need that arises in the conurbation RH contend that locations that immediately abut the edge of Wolverhampton should be the preferred location to direct new housing development.</p>	Yes	No	Not stated	All urban fringe locations on the edge of the Black Country are Green Belt locations. The strategy focuses Green Belt release on the districts most sustainable Tier 1 settlement within walking distance of rail access. The broad location of the urban fringe of the Black Country does not offer the level of public transport, particularly to employment centres in the district and surrounding areas, which are present in the District's Tier 1 settlements and are therefore not considered to be well served by public transport, relying on limited bus services to access higher order services.
Shropshire Council	STA24-039-01	5.21	<p>LATE SUBMISSION A proposed contribution of 640 dwellings towards the unmet housing needs of the GBBCHMA is supported. The extent of the contribution is a matter for the duty to cooperate process but would note -</p> <p>SSDC forms part of the GBBCHMA within which the unmet housing need is forecast to arise. It is most sustainable to meet housing needs within the LA area the needs arise. The proposed contribution is substantially lower than previously proposed. NPPF states 'authorities may choose to review and alter Green</p>	Not stated	Not stated	Not stated	Comments noted.



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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>Belt boundaries where exceptional circumstances are fully evidenced and justified'. Shropshire are proposing a contribution of 1,500 dwellings towards the unmet need of the Black Country.</p> <p>The principle of meeting the entirety of the local housing need for South Staffordshire is supported.</p>				
PlanIT Planning & Development for Amadis Holdings Ltd	AGT24-034-01-03	5.21	<p>We are concerned that the suggested housing requirement of 4,726 dwellings fails to meet the housing need of the Greater Birmingham and Black Country. The SSHMA fails to correctly factor in affordable housing need. The draft plan seeks to rely upon affordable housing delivery from the 640 dwellings proposed to meet the growth requirements of the conurbation to support the South Staffordshire affordable housing need. This is inappropriate given that these 640 dwellings are proposed to meet the growth requirements of the conurbation which has its own affordable housing needs. No consideration has been given to increasing the minimum Standard Method housing figure to reflect the local authority's economic growth aspirations and the fact that the age profile of South Staffordshire is increasing resulting in a decrease in the 'pool' of working age demographic. Housing shortfalls across the HMA are significant as evidenced by the emerging Birmingham Plan and the now aborted Black Country Plan and we are therefore concerned the plan target is too low. It is important that the Council makes the best use of the sites which the Plan allocates for housing development. If additional sites are required for allocation, then there is an opportunity to allocate land at Yew Tree Lane, nr Wolverhampton.</p>	Yes	No	No	<p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>The Council has used the standard method formula to determine our housing need and does not consider that exceptional circumstances exist to deviate from its use. The Council considers that the use of the standard method as the basis of our housing requirement is justified and an appropriate strategy.</p> <p>The Housing Market Assessment indicates 29% of housing delivered through the plan should be affordable. This incorporates need from South Staffordshire and the 640 contribution to unmet needs. The Council is confident Policy HC3 will ensure sufficient affordable housing to meet this need will be provided.</p>
PlanIT Planning & Development for Messer's Jenks and Letts	AGT24-034-03-03	5.21	<p>We are concerned that the suggested housing requirement of 4,726 dwellings fails to meet the housing need of the Greater Birmingham and Black Country. The SSHMA fails to correctly factor in affordable housing need. The draft plan seeks to rely upon affordable housing delivery from the 640 dwellings proposed to meet the growth requirements of the conurbation to support the South Staffordshire affordable housing need. This is inappropriate given that these 640 dwellings are proposed to meet the growth requirements of the conurbation which has its</p>	Yes	No	No	<p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			own affordable housing needs. No consideration has been given to increasing the minimum Standard Method housing figure to reflect the local authority's economic growth aspirations and the fact that the age profile of South Staffordshire is increasing resulting in a decrease in the 'pool' of working age demographic. Housing shortfalls across the HMA are significant as evidenced by the emerging Birmingham Plan and the now aborted Black Country Plan and we are therefore concerned the plan target is too low. it is important that the Council makes the best use of the sites which the Plan allocates for housing development. If additional sites are required for allocation, then there is an opportunity to enlarge site 419A and B by including land which is within our client's ownership at Keepers Lane.				<p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>The Council has used the standard method formula to determine our housing need and does not consider that exceptional circumstances exist to deviate from its use. The Council considers that the use of the standard method as the basis of our housing requirement is justified and an appropriate strategy.</p> <p>The Housing Market Assessment indicates 29% of housing delivered through the plan should be affordable. This incorporates need from South Staffordshire and the 640 contribution to unmet needs. The Council is confident Policy HC3 will ensure sufficient affordable housing to meet this need will be provided.</p>
CPRE Staffordshire	STA24-013-03	5.21	Housing Target. Oppose to the provision of overspill housing, however if deemed necessary such provision should prioritise development on brownfield sites, only be allocated post 2028 at a controlled rate under the Duty to Cooperate. Overspill requirement should be separated from South Staffordshire requirement and it should be clear that the five year supply test is only applied to South Staffordshire's requirement.	Not stated	Not stated	No	<p>The plan has prioritised all suitable brownfield sites (i.e. that conform to the preferred spatial strategy) as evidenced by our SHELAA 2024, Spatial Strategy Topic Paper 2024 and Exceptional Circumstances Topic Paper 2024.</p> <p>The Council consider it is appropriate to include the contribution (currently proposed 640) to the unmet needs of the Birmingham and Black Country within South Staffordshire's housing target and will form part of the five-year housing land supply requirement.</p>
Pland Estates Ltd	AGT24-033-01-01	Table 7	As Penkridge is a large urban extension the plan needs to look forward to 2053 (i.e at least 30 years) in order to comply with NPPF para 22.	Yes	No	Yes	It is not considered necessary for the plan to look further ahead by at least 30 years as all sites, including land north of Penkridge can be delivered within the proposed plan period to 2041.
Talbot, R	RES24-230-03	Table 7	This a more realistic number - the contribution of 640 is far fairer.	Not stated	Not stated	Not stated	Comments noted.
PlanIT Planning & Development for Amadis Holdings Ltd	AGT24-034-01-05	Table 8	Spatial Housing Strategy is flawed. Whilst we have no particular concern with the majority of development being directed to the larger settlements, a significant increase to the overall housing requirement is required Additional development should be directed to the district's settlements and adjacent to	Yes	No	Yes	Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper



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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			the urban edge of Wolverhampton to meet the increased housing target.				<p>2024.This balances the district’s growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan’s ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council’s Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>All urban fringe locations on the edge of the Black Country are Green Belt locations. The strategy focuses Green Belt release on the districts most sustainable Tier 1 settlements within walking distance of rail access. The broad location of the urban fringe of the Black Country does not offer the level of public transport, particularly to employment centres in the district and surrounding areas, which are present in the District’s Tier 1 settlements and are therefore not considered to be well served by public transport, relying on limited bus services to access higher order services.</p>
PlanIT Planning & Development for Messer’s Jenks and Letts	AGT24-034-03-05	Table 8	We support the Spatial Housing Strategy’s emphasis on directing the majority of development to the larger settlements. Codsall has many services and facilities compared to other villages in the district, including access to two railway stations and a functional relationship with the conurbation. This location is therefore well placed to accommodate additional growth.	Yes	Yes	Yes	Comments noted.
AJ Carter Consulting for Jeavons	AGT24-003-01-02	Table 8	It shows the proportion split across the settlements; and for Pattingham as one of the Tier 3 village this is only 0.5% (26 homes). Other tier 3 locations are afforded much greater housing delivery; namely Essington (1.2%) Coven (1%) and Featherstone (0.8%).	Yes	No	Yes	<p>The level of growth for Tier 3 settlements has been determined ‘bottom up’ by the capacity of suitable sites (assessed through the Housing Site Assessment Topic Paper) that accord with the preferred spatial strategy (Spatial Option i), as opposed to a ‘top down’ figure for each village being provided. Taking this approach will lead to a variation in levels of growth between settlements within the same tier, but this reflects both village and site-specific constraints and therefore is considered an appropriate approach.</p> <p>No change proposed.</p>
CPRE Staffordshire	STA24-013-02	Table 8	CPRE have added together proposed housing totals in Table 8 which indicate a total provision of 5005 dwellings. This is 919 dwellings in excess of South Staffordshire need and 289 in	Not stated	No	No	Ensuring plans can respond to changing circumstances is a key requirement of Local Plans and the principle of ‘over allocation’ to ensure the

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			<p>excess of need plus overspill contribution. South Staffordshire has a history of over delivery there is therefore no justification for this level of flexibility allowance.</p> <p>On the basis of both historic and current data the windfall allowance is unjustifiably low resulting in a need for excessive allocation of green belt and greenfield sites.</p>				<p>plan is flexible in this regard has been long established. Given the mix of sites proposed in the plan, the Council consider the 10% plan flexibility to be appropriate.</p> <p>The windfall allowance of 40 dwellings per annum is evidenced and justified in the SHELAA (2024), with a conservative approach taken to setting this allowance. Taking this approach to the windfall allowance is considered appropriate and avoids making overly optimistic assumptions.</p> <p>No change proposed.</p>
PlanIT Planning & Development for Hampton Oak Developments Ltd	AGT24-034-02-03	Table 8	The Spatial Housing Strategy identified in Table 8 is flawed. May need to increase housing requirement with additional development required across the settlement hierarchy to meet the increased housing target. Additional development should be directed towards Pattingham.	Yes	No	Yes	<p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>Focusing green belt release at the most sustainable Tier 1 locations is consistent with the NPPF requirement to give first consideration to land which is well served by public transport, and therefore representing an appropriate strategy. The level of growth attributed to Pattingham is considered proportionate considering its level of services and facilities and its location surrounded by Green Belt.</p>
PlanIT Planning & Development for Miller Homes	AGT24-034-04-04	Table 8	We support the Spatial Housing Strategy's emphasis on directing the majority of development to the larger settlements. Our client's land interests are in Codsall/Bilbrook which is one of the largest and most sustainable locations for development in the plan area. Codsall and Bilbrook have many services and facilities compared to other villages in the District, including access to two railway stations and a functional relationship with the conurbation.	Yes	Yes	Yes	Comments noted.

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
Hancher, R	RES24-095-02	Table 8	<p>The split of housing delivery is logical. However, this appears to be underpinned in many cases on the assumption of good public transport connectivity.</p> <p>There is a concern that as public transport services are reduced then the logic for this distribution will become invalid. The policy should be more heavily predicated on public transport services being protected or improved. And where services are cut there should be grounds for this distribution to be revisited and adjusted accordingly.</p>	Not stated	Not stated	Not stated	Trains times and frequency are regularly subject to change, however, there remains regular services from the districts tier 1 settlements allowing access via sustainable transport to neighbouring urban areas. This justifies growth being predominantly focused on Tier 1 settlements.
Talbot, R	RES24-230-01	Table 8	I believe this is a good distribution with the focus on the tier one villages. The protection of green belt in favour of alternative sites is extremely positive.	Not stated	Not stated	Not stated	Comments noted.
Cain, S	RES24-033-02	Table 8	<p>Stafford is already suffering with housing developments and more houses at Wildwood will add traffic to the A34, add pressure onto schools and doctors surgeries.</p> <p>Site 036c land south of Stafford should be removed from the plan and be retained as Open Countryside.</p>	No	No	No	<p>Any supply that may have been delivered by Stafford is not a relevant consideration when preparing the plan for South Staffordshire.</p> <p>Engagement throughout plan preparation has taken place with Local Highways Authority, School Organisation Team (SOT) (both Staffordshire County Council), and Staffordshire and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical Commissioning Group). None of which have indicated that the impact of the proposed development would have significant or unmitigable impacts on their respective infrastructure responsibilities, or addressed through proposed Policies HC14, and HC15.</p> <p>No changes proposed.</p>
Cain, S	RES24-033-03	5.28	<p>The "sensitive landscape" is not being recognised with the proposed allocation of site 036c, land south of Stafford, impacting local residents.</p> <p>Site 036c should be removed from the plan.</p>	No	No	No	Landscape sensitivity has been assessed through the Landscape Sensitivity Study. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that better perform as sustainable allocations. Any future planning application would be expected to address Policy NB4 – which the council has included as a proposed policy in the plan – insofar as the design and location of new development should take account of the characteristics and sensitivity of the landscape and its surroundings, including not having a detrimental impact upon any medium or long-distance views.

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							No change proposed.
Watt, J	RES24-246-01	5.28	<p>Already serious congestion on local roads around site 036c – land south of Stafford, particularly when M6 closed for accident. The A34 is a regular route for emergency ambulances which will be severely impacted with more residents. This cannot be considered an extension to Stafford as it will not be within Stafford’s boundary and therefore no financial benefit to Stafford Borough. Any new residents will be using Stafford’s facilities with no financial contribution.</p> <p>Site 036c should remain as agricultural land.</p>	No	No	No	<p>Engagement throughout plan preparation has taken place with Local Highways Authority (Staffordshire County Council). They have not indicated that the impact of the proposed allocation would not generate any significant impacts on the transport network or highway safety that cannot be mitigated in line with paragraph 114 d of the NPPF. Financial contributes will be sought and secured at a future planning application stage and used to secure necessary compensatory improvements as deemed appropriate.</p> <p>No change proposed.</p>
Head, S	RES24-102-01	5.31	Fully Support this Local Plan and the vision that is set out for the future for Brewood. This seems to be following the national housing policy and particularly pleased to see no further safeguarding of land for the next local plan (2028) too - This protects the village from speculative planning applications.	Not stated	Not stated	Not stated	<p>Comment noted.</p> <p>No change proposed.</p>
Danby, P	RES24-049-02	5.31	<p>I support the local plan for the pre planned homes in Brewood. I do not support the major planning applications being made across two green belt areas in Brewood, Bonningale homes proposed care home is not required in Brewood and is simply for financial gain.</p> <p>We have limited infrastructure to support the proposed 100’s of homes, we have full schools and limited public transport, our shops are very limited with only 2 general shops remaining. Our roads can’t take more traffic especially at school times, our village comes to a standstill at school times.</p>	Not stated	Not stated	Not stated	Comments relate to planning applications that sit outside of the Local Plan.
Hancher, R	RES24-095-04	5.31	Development in the village of Brewood should be conditional on the delivery of public transport improvements. At present the bus services is inadequate and does not meet the needs of residents. Rail connectivity at commuter stations at Codsall / Bilbrook and Penkridge is being reduced. Without improved public transport connectivity road usage will continue to increase and will become dangerous.	Yes	No	No	The plan includes a sustainable transport policy (Policy EC12) that will deliver sustainable transport measure, whilst acknowledging that these will need to be proportionate to development and in accordance with the planning obligation tests in paragraph 57 of the NPPF.
Oakes, J	RES24-161-01	5.31	The historic character of Brewood will be lost if surrounding Green Belt is released for any further housing growth. Housing development that has already taken place within the village has put an added strain on local services and facilities. The drainage system is not coping, rainwater is now causing flooding on a regular basis. The roads are narrow and some do not have pavements, additional housing in the village has considerably increased traffic flow. Walking to the village centre can be	Not stated	Not stated	Not stated	<p>Comments noted. Housing development proposed for individual villages in the plan is considered proportionate to their services and facilities.</p> <p>Severn Trent Water have a statutory responsibility to ensure that appropriate drainage infrastructure is in place to serve new</p>

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			dangerous as cars travel at speed ignoring pedestrians on the narrow roads.				developments. Impact on highways and active travel links will be considered in line with the plans sustainable transport policy (Policy EC12).
Talbot, R	RES24-230-02	5.31	A realistic approach to housing development in the village of Brewood has been taken. The site off Four Ashes is in the right location and the correct size for the village, its amenities and infrastructure.	Not stated	Not stated	Not stated	Comments noted.
Duncan, R & S (Cllrs)	STA24-016-01	5.35	<p>The Plan is unsound.</p> <p>Receiving many objections from our constituents with regards to the Local Plan proposed developments for Cheslyn Hay, Site Reference Numbers 523, 119a, 730 &amp; 136, which we fully understand, and appreciate. We fully endorse and totally agree with the comments and objections we have personally received to date.</p> <p>Cheslyn Hay as a village is being slowly destroyed by the over development under the pretext of our supposed 'super infrastructure and communication links to the motorway and train services. Both are at the best mediocre. Our infrastructure is unable to successfully cope with the immense stress they are continually being subjected to. With our motorway links congested at Junction 11 and beyond in the mornings and at all peak times. Our Local Roads are too small and in desperate need of repair and resurfacing. Our railway service and the associated 'small' carpark are both poor and both in need of urgent improvement. It is important to note the Cheslyn Hay Railway Carpark is used by many nearby communities including, Cheslyn Hay, Great Wyrley, Essington, Shareshill, and Cannock to name but a few. This adds further burden on our already congested roads / infrastructure. As a consequence, this puts additional stress on many of the local roads &amp; streets in the vicinity of the railway carpark, belonging to South Staffordshire District Council (SSDC) and know they are considering charging for the privilege, which will have an adverse effect.</p>	Yes	No	No	<p>The identification of Cheslyn Hay and Great Wyrley as a Tier 1 settlement is supported by the Rural Services and Facilities Audit 2021. Engagement with infrastructure providers has taken place throughout plan preparation to ensure there is the required infrastructure to support growth proposed, or proposals can be made acceptable through planning obligations. The highways authority has also fed into site assessment to ensure site are in principle acceptable in highways terms.</p> <p>No change proposed.</p>
PlanIT Planning & Development for Messer's Jenks and Letts	AGT24-034-03-04	5.39	We support that housing in Locality 4 should be focused in and around Codsall/Bilbrook. The Council should encourage densities to ensure that the best use is made of those sites which are proposed as allocations.	Yes	Yes	Yes	<p>Comments noted.</p> <p>The plan includes a density policy (Policy HC2) that proposes a minimum of 35 dwellings per net developable hectare for developments on the edge of Tier 1 settlements like Codsall. The approach in the policy is justified in the Housing Density Topic Paper 2024.</p>
PlanIT Planning & Development for Miller Homes	AGT24-034-04-03	5.39	We support the recognition that housing in Locality 4 should be focused in and around Codsall and Bilbrook. The settlement benefits from a range of services and facilities including two railway stations. It is one of the most sustainable locations for	Yes	Yes	Yes	<p>Comments noted.</p> <p>All suitable sites around Codsall/Bilbrook have been identified for allocation, evidenced by the</p>



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			development in the plan area. It is ideally located to accommodate additional development and the number of dwellings proposed should be maximised to take advantage of the sustainable location.				Housing Site Assessment Topic Paper 2024.  To ensure efficient use of land around Tier 1 settlements, densities are set at a minimum of 35 dwellings per hectare as set in Policy HC2: Housing Density.
AJ Carter Consulting for Jeavons	AGT24-003-01-02	5.41	Pattingham has been classified as a Tier 3 settlement suggesting a limited number of services and facilities compared to some other settlements in the district. The village has a population of 1,800 people supported by a variety of services including a range of shops, pubs and restaurants. There is also the St Chad's First School and Nursery providing education for Early Years, Key Stage 1 & 2. In terms of connectivity the village has excellent links via public transport to both Wolverhampton and Bridgnorth. The 10A service links the village to Wolverhampton, whilst the 9 service connects the village with Bridgnorth. We consider that Pattingham should be designated a Tier 2A settlement, recognising that the village is not of the scale of a Tier 2 settlement but that it is strategically more important than the other Tier 3 settlements identified in the Plan, while at the same time meeting the aims of para 128 of the NPPF.	Yes	No	Yes	The level of growth for Tier 3 settlements has been determined 'bottom up' by the capacity of suitable sites (assessed through the Housing Site Assessment Topic Paper) that accord with the preferred spatial strategy (Spatial Option i), as opposed to a 'top down' figure for each village being provided. Taking this approach will lead to a variation in levels of growth between settlements within the same tier, but this reflects both village and site-specific constraints and therefore is considered an appropriate approach.  It is acknowledged that there may be some variation between access to services and facilities for villages within the same tier, however they have been grouped based upon broadly similar characteristics in the Rural Services and Facilities Audit 2021.  No change proposed.
Marsh, T	RES24-141-01	5.43	The plan from the housing developer is thin on information. What types of homes will be built, how it will tackle sustainability and use of green materials? There are facilities for young children, but due to where we are this is not required, as there is green space. How will they address the destruction of wildlife? How will they address the constant flooding along the Poolhouse Road? How is the issue of transport to be tackled, as there are no bus stops around that area. The nearest train station is up to 30 minutes away.	Yes	No	No	The plan includes policies detailing the type and tenure of homes that will be required including affordable housing, as well as policies relating to sustainable transport, the natural environment and provision of open space, including children's play.  No change proposed.
Birmingham City Council	STA24-004-01	5.46	LATE SUBMISSION The Publication document indicates that there is an identified need for 162 pitches for Gypsy and Traveller households in South Staffordshire over the plan period, whilst currently the District Council can only deliver 37 pitches. This leaves a significant shortfall which is to be explored through continuing Duty to Cooperate engagement with neighbouring authorities. To this effect, South Staffs has previously written to Birmingham City Council, along with other local authorities within the HMA, to request if sites could be found for this unmet need. The City Council responded in September 2022 to say that Birmingham	Not stated	Not stated	Not stated	Comments noted.



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			also has an identified a requirement to provide additional sites for gypsy and traveller provision and, alongside the significant potential unmet need for wider housing provision within Birmingham, is unlikely to be able to identify sites for gypsy and traveller provision over and above its own requirements. This position remains and the City Council continues to be unable to help South Staffs in this matter for the foreseeable future.				
Shropshire Council	STA24-039-01	5.46-5.49	LATE SUBMISSION A number of sites were previously identified as suitable to be released from the Green Belt and allocated to provide for housing needs. Many of these sites are no longer considered necessary to achieve the proposed strategy. It is unclear what consideration has been given to the potential for these sites to accommodate Gypsy and Traveller pitches to meet the identified need.	Not stated	Not stated	Not stated	Site promoters of preferred housing sites (prior to the 2022 Regulation 19 consultation) were contacted to see if their sites could accommodate a traveller site, however this process failed to identify additional supply. See Gypsy and Traveller Topic Paper 2024 for further details.
Birmingham City Council	STA24-004-01	5.50	LATE SUBMISSION The Economic Development Needs Assessment (EDNA), carried out on behalf of South Staffs as part of the evidence base for the Local Plan review, suggests that South Staffs has an objectively assessed employment land need of 62.4 hectares. However, a minimum of 107.45 hectares of employment land has been identified over the plan period and so the District Council is therefore able to make available a potential contribution of 45.2 hectares towards shortfalls experienced in Dudley, Walsall and Wolverhampton. This is welcome in helping to reduce potential employment land shortfalls and pressures within the conurbation.  In addition, 232ha of Green Belt land has been released in South Staffs to deliver a large-scale strategic rail freight interchange - West Midlands Interchange (WMI) which is of regional significance. The EDNA indicates that only 18.8ha of WMI is attributable to South Staffordshire's needs, indicating that the rest may be able to contribute to unmet needs in the wider WMI travel to work area. Supporting work by Stantec, commissioned to examine the apportionment of WMI, suggests it can provide additional surplus B8 employment land to a wider travel to work area including the Black Country authorities, equating to 67ha of B8 land to the four Black Country planning authorities and 53ha to Birmingham (taken from the Stantec report). Again, this is welcome and fully supported by the City Council in directly supporting employment land shortages in Birmingham as well as alleviating pressures elsewhere in the West Midlands as the conurbation does not have the land capacity or the locations to support strategic sites of this size.	Not stated	Not stated	Not stated	Comments noted.
Savills UK Ltd for St Modwen & JM	AGT24-038-04-	5.50-5.58	We do not agree with the wording of paragraph 5.54, which suggests that M6 Junction 13, Dunston (E30) is only required to	Yes	No	No	The additional employment land at M6 Junction 13 (17.6) was added to the 27.6ha of surplus

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Holt	03		<p>address the unmet needs in the Black Country FEMA and not South Staffordshire's own need. The site is capable of meeting the demand arising in South Staffordshire as well as the FEMA, and should not be categorised into meeting unmet needs of neighbouring authorities only. Indeed, the Savills Addendum Note concludes that, regardless of what demand scenario you consider, the Site is needed to accommodate South Staffordshire's demand.</p> <p>It recommended that paragraph 5.54 is amended as follows: "It concluded that in terms of strategic employment land, 27.6ha of surplus land (excluding WMI) could reasonably be attributed to cross boundary unmet needs in the Black Country FEMA. The allocation of land at M6 Junction 13, Dunston (17.6ha) is required to boost the supply pipeline to ensure plan flexibility and that the pipeline of sites more closely reflect recent take up."</p>				<p>strategic employment land identified in the EDNA (2024) update to arrive at the 45.2ha contribution to the Black Country FEMA as referenced in Policy DS4. Therefore, the wording is considered accurate and does not need amending. The EDNA update 2024 did not identify a shortfall in employment land originating from South Staffordshire that the allocation at M6, Junction 13 would address.</p> <p>No change proposed.</p>
Powell, D	RES24-185-01	5.54	We are already oversubscribed.	No	No	No	Comments noted.
Shropshire Council	STA24-039-01	5.55-5.58	<p>LATE SUBMISSION</p> <p>The principle of meeting the entirety of employment land needs for South Staffordshire is supported.</p> <p>10ha of employment land on WMI is 'required' by Cannock Chase District Council to support the achievement of their employment land needs.</p> <p>112.2ha of surplus strategic employment land in South Staffordshire is available to the Black Country Authorities to support the achievement of their employment land needs.</p> <p>These are supported.</p>	Not stated	Not stated	Not stated	Comments noted.
<b>POLICY DS1: GREEN BELT</b>							
Carter, M	RES24-034-01	Policy DS1	Support the protection of the Green Belt	Not stated	Not stated	Not stated	Comments noted.
Jordan, G	RES24-127-01	Policy DS1	Fully support the protection of Green Belt. Lawnswood and Friars Gorse Green Belt is important for wellbeing for residents. Local plan should be in line with revised NPPF.	Yes	Yes	Yes	Comments noted.
Chapman, J	RES24-040-01	Policy DS1	Support the protection of the Green Belt.	Yes	Yes	Yes	Comments noted.
PlanIT Planning & Development for Messer's Jenks and Letts	AGT24-034-03-06	Policy DS1	The Local Plan fails to remove land from the Green Belt and safeguard it for development in order to ensure that the Green Belt is not continually reviewed through each Local Plan review. Policy DS1 should confirm that safeguarded land has been identified for future development to ensure that Green Belt	Yes	No	Yes	The Council considers that it would be inappropriate to release additional land from the Green Belt for safeguarded land through this Local Plan, given the need for any such release to be justified by exceptional circumstances.

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			boundaries endure beyond the plan period in accordance with provisions of paragraph 148 of the Framework. Additional sites should be safeguarded accordingly for this purpose. Our client's land adjoining Site 419 A and B could be included within the list of safeguarded sites.				It is acknowledged that the approach to future Green Belt release will be considered through an updated Strategic Growth Study across the GBBCHMA which South Staffordshire will be an active partner in, and it is right to consider this issue strategically across this wider functional geography. To date, no GBBCHMA authority has requested that South Staffordshire provide additional safeguarded land for longer term unmet needs, nor has this been required in recent examinations in the GBBCHMA. Given these factors and the requirement in national policy to review the plan in whole or in part every 5 years, it is not considered appropriate or necessary to release safeguarded land at this stage.  No change proposed.
PlanIT Planning & Development for Amadis Holdings Ltd	AGT24-034-01-06	Policy DS1	The Local Plan fails to remove land from the Green Belt and safeguard it for development in order to ensure that the Green Belt is not continually reviewed through each Local Plan review. Policy DS1 should confirm that safeguarded land has been identified for future development to ensure that Green Belt boundaries endure beyond the plan period in accordance with provisions of paragraph 148 of the Framework. Additional sites should be safeguarded accordingly for this purpose. Our client's land adjoining Yew Tree Lane, nr Wolverhampton could be included within the list of safeguarded sites.	Yes	No	Yes	The Council considers that it would be inappropriate to release additional land from the Green Belt for safeguarded land through this Local Plan, given the need for any such release to be justified by exceptional circumstances. It is acknowledged that the approach to future Green Belt release will be considered through an updated Strategic Growth Study across the GBBCHMA which South Staffordshire will be an active partner in, and it is right to consider this issue strategically across this wider functional geography. To date, no GBBCHMA authority has requested that South Staffordshire provide additional safeguarded land for longer term unmet needs, nor has this been required in recent examinations in the GBBCHMA. Given these factors and the requirement in national policy to review the plan in whole or in part every 5 years, it is not considered appropriate or necessary to release safeguarded land at this stage.  No change proposed.
PlanIT Planning & Development for Hampton Oak Developments	AGT24-034-02-04	Policy DS1	The Local Plan fails to remove land from the Green Belt and safeguard it for development in order to ensure that the Green Belt is not continually reviewed through each Local Plan review. Policy DS1 should confirm that safeguarded land has been identified for future development to ensure that Green Belt boundaries endure beyond the plan period in accordance with provisions of paragraph 148 of the Framework. Additional sites	Yes	No	Yes	The Council considers that it would be inappropriate to release additional land from the Green Belt for safeguarded land through this Local Plan, given the need for any such release to be justified by exceptional circumstances.  It is acknowledged that the approach to future

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			should be safeguarded accordingly for this purpose. Our client's land at Pattingham could be included within the list of safeguarded sites.				Green Belt release will be considered through an updated Strategic Growth Study across the GBBCHMA which South Staffordshire will be an active partner in, and it is right to consider this issue strategically across this wider functional geography. To date, no GBBCHMA authority has requested that South Staffordshire provide additional safeguarded land for longer term unmet needs, nor has this been required in recent examinations in the GBBCHMA. Given these factors and the requirement in national policy to review the plan in whole or in part every 5 years, it is not considered appropriate or necessary to release safeguarded land at this stage.  No change proposed.
Claremont Planning Consultancy for Noakes, J	AGT24-012-01-04	Policy DS1	Whilst the plan concludes there are exceptional circumstances for some limited amendments to Green Belt boundaries, insufficient consideration has been given to the District's housing requirement or unmet needs from neighbouring authorities and the need to provide an appropriate buffer to demonstrate Green Belt boundaries will not need to be altered at the end of the plan period. This version of the plan fails to appropriately plan for cross boundary needs and consideration to further sites on the edge of the Black Country well related to existing urban areas should be given. This should include smaller parcels of land to deliver housing in sustainable locations including land at Essington Road.	Yes	No	No	Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.  A contribution to unmet needs of authorities in the Housing Market Area is being provided in addition to meeting our own housing needs, in accordance with what the council considers to be an appropriate strategy. Ongoing cooperation with Duty to Cooperate bodies has taken place and informed the plans strategic approach, as detailed in our Duty to Cooperate Topic Paper. Emerging Statements of Common Ground are being prepared with all neighbouring and HMA authorities to reflect our respective positions.  Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.  No change proposed.
Everett, D	RES24-065-01	Policy DS1	Support the protection of the Greenbelt.	Not stated	Not stated	Not stated	Comments noted.

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
Hill, S.M	RES24-106-01	Policy DS1	Support the protection of the Greenbelt	Not stated	Not stated	Not stated	Comments noted.
Jordan, B.D	RES24-126-01	Policy DS1	Support the protection of the Green belt which is necessary for community well being.	Yes	Yes	Yes	Comments noted.
Lichfield District Council	STA24-027-01	Policy DS1	LDC supports the position in policy DS1 whereby SSDC is making releases from the Green Belt to meet its own and wider area housing need. The deletion of the previous Green Belt site allocations SA2 and SA7 and the resultant fall in HMA contribution will need to be fully and robustly justified in the context of the significant scale of the HMA housing shortfall, particularly given South Staffordshire's geographical and transport links with the Black Country and Birmingham.	Yes	Yes	Yes	The rationale for the council's capacity led approach and revised housing target (4726 dwellings) and resultant reduced HMA contribution is set out in the Council's Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024.
Walsall Council	STA24-049-01	Policy DS1	<p>The new plan will replace rather than alter the previous local plan. The penultimate sentence which begins "The Green Belt boundary is altered" should therefore form part of the supporting text rather than be part of the policy itself. The revised Green Belt boundary will be defined on the amended policies map as referred to in the first sentence of the policy.</p> <p>It is considered that an alternative to the term "damaged and derelict land" should be used as it could provide justification for development on land that has been damaged intentionally. It might be preferable to use the term "previously developed land" as this is defined in national policy.</p> <p>"The Green Belt boundary is altered through this Plan to accommodate development allocations set out in Policies SA1, SA3, and SA5. The boundaries of the reviewed Green Belt sites are identified in Appendices B-E of this document and on the policies map." This should be supporting text rather than part of the policy.</p> <p>"Damaged and derelict land" amended to "previously developed land".</p>	Not stated	Not stated	Not stated	<p>The council consider that as the penultimate paragraph refers to where Green Belt boundaries have been altered then this warrants inclusion within the policy itself rather than being relegated to the supporting text.</p> <p>Think that the suggested reference to previously developed land instead of damaged and derelict land may be too broad as this could include any building in the Green Belt. This paragraph is around enhancing the beneficial uses of the Green Belt and improvement to damaged and derelict land is considered more in line with achieving this enhancement.</p>
Cheslyn Hay Parish Council	STA24-011-01	Policy DS1	The Parish Council believe that all green belt land should be protected and object to any green belt land being used in Cheslyn Hay when there are still brown field sites available which could be allocated. We emphasise the importance of protecting the limited remaining green belt space in Cheslyn Hay.	Not stated	No	Not stated	<p>The Council considers that its approach to Green Belt land is consistent with national planning policy, demonstrating exceptional circumstances in a manner consistent with NPPF requirements. See the Green Belt Exceptional Circumstances Topic Paper 2024 for these.</p> <p>No change proposed.</p>
First City for St Mary's Presbytery and The Archdiocese of Birmingham	AGT24-018-01-01	Policy DS1	<p>The NPPF clearly sets out the role of the Green Belt and what type of development should be allowed.</p> <p>We do not consider the Local Plan should include any Green Belt related policy that would result in increased restrictions on the</p>	No	No	No	The council considers Policy DS1 to be consistent with national policy and does not impose increased restrictions on the Green Belt over and above national policy.



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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			Green Belt in excess of national policy requirements.  Further guidance on acceptable types of development in the Green Belt is welcome.				No change proposed.
Marrons Planning for Bloor Homes	AGT24-027-01-01	Policy DS1	In order to achieve a sustainable pattern of development for Wombourne, Site 283 Land North of Bridgnorth Road should be allocated in the Plan. Green Belt position paper prepared for Bloor Homes confirms that the site affords less of a contribution to the Green Belt than the wider land parcel in the Council Green Belt Study. The site is well enclosed and unlikely to have a harm effect on the visual openness of the Green Belt. The release of the Site from the Green Belt would afford an opportunity for a consistent boundary treatment for Wombourne, and better integrate the southern edge of the village into the landscape. The site could deliver Green Belt compensatory benefits as well as ecological benefits.  The Plan should be amended to identify safeguarded land to meet longer term development needs in sustainable locations.	Yes	No	No	Allocating site 283 would not be consistent with the council's spatial strategy that limits Green Belt release to our most sustainable tier 1 settlements. The council's Green Belt Study (2019) takes a strategic view for considering the harm of releasing land from the Green Belt. Its methodology ensures that if there are variations to the harm of releasing land from the green belt within the wider land parcel, then this is reflected in the assessment results.  The Council considers that it would be inappropriate to release additional land from the Green Belt for safeguarded land through this Local Plan, given the need for any such release to be justified by exceptional circumstances. It is acknowledged that the approach to future Green Belt release will be considered through an updated Strategic Growth Study across the GBBCHMA which South Staffordshire will be an active partner in, and it is right to consider this issue strategically across this wider functional geography. To date, no GBBCHMA authority has requested that South Staffordshire provide additional safeguarded land for longer term unmet needs, nor has this been required in recent examinations in the GBBCHMA. Given these factors and the requirement in national policy to review the plan in whole or in part every 5 years, it is not considered appropriate or necessary to release safeguarded land at this stage.  No change proposed.
Groom, J	RES24-090-01	Policy DS1	The plan protects Green Belt and aligns with national policy. It supports the preservation of biodiversity and commits to involving local communities in planning decisions.	Yes	Yes	Yes	Comments noted.
Acres Land and Planning for Hallam Land Management	AGT24-001-01-01	Policy DS1	Object to the application of Policy DS1 to include land which borders the edge of the conurbation of Wolverhampton and the Black Country and specifically the proposal to accommodate Policy SA1 'Land East of Bilbrook', on these grounds since there is a clear danger of 'coalescence' with the urban area. On the other hand, we consider that the site at Sandy Lane, Codsall	Not stated	No	Not stated	Land east of Bilbrook does not adjoin Wolverhampton and includes defensible boundaries to avoid risk of coalescence.  Whilst site 222 is to the north of Codsall reflecting a broad potential area for future



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			(area 222) is consistent with the area which was recommended for future growth within the 2018 Strategic Sites Study (north of Codsall/Bilbrook) could logically meet the exceptional circumstances				growth in the 2018 Strategic Growth Study, this does not override the results of a consistent site assessment against a number of planning criteria, as set out in our Housing Site Assessment Topic Paper 2024.  No change proposed.
RPS Group for Persimmon Homes	AGT24-037-02-03	Policy DS1	<p>RPS agrees that exceptional circumstances exist to justify the release of green belt land for housing. This is because, as stated at paragraph 5.3 of the SSLP, opportunities to locate development on brownfield sites is 'very limited' due to the largely rural nature of the District. However, RPS considers that the Council can, and should, go much further than its current proposals for altering the Green Belt. RPS contend that Land east of Brookhouse Lane (site 170) is an appropriate site to be released for this purpose.</p> <p>The assessment of site 170 as moderate harm in the Green Belt Study is incorrect as this assessment relates to the sub parcel rather than specifically site 170. Furthermore, the GBS does not take into account the emerging proposals for the Site set out in the illustrative masterplan in the Vision Document, which shows that a significant proportion of the Site will remain open and undeveloped as part of development.</p> <p>The assessment does not reflect on all available and relevant information submitted in support of Site 170. On this basis, the assessment of contribution and harm applied by the Council to Site 170 is not robust and so is not soundly based.</p> <p>A site-specific Green Belt assessment has been undertaken on behalf of Persimmon Homes by Pleydell Smithyman Ltd (PSL) against the five purposes of Green Belt demonstrates that the site has a low harm rating. On this basis, land east of Brookhouse Lane should be released from the Green Belt and allocated for housing in the SSLP.</p> <p>As an alternative, RPS contend that it would be logical to identify site 170 for safeguarding in this local plan. The evidence presented in this submission shows that Site 170 would cause the least harm to the wider Green Belt than any other Green Belt site option considered at Featherstone.</p>	Not stated	No	Not stated	<p>Representation appears to relate to the Council's 2022 Regulation 19 Publication Plan, rather than the 2024 Publication Plan.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>Allocating site 170 would not be consistent with the council's spatial strategy that limits Green Belt release to our most sustainable tier 1 settlements. The council's Green Belt Study (2019) takes a strategic view for considering the harm of releasing land from the Green Belt. Its methodology ensures that if there are variations to the harm of releasing land from the green belt within the wider land parcel, then this is reflected in the assessment results.</p> <p>The Council considers that it would be inappropriate to release additional land from the Green Belt for safeguarded land through this Local Plan, given the need for any such release to be justified by exceptional circumstances. It is acknowledged that the approach to future Green Belt release will be considered through an updated Strategic Growth Study across the GBBCHMA which South Staffordshire will be an active partner in, and it is right to consider this issue strategically across this wider functional geography. To date, no GBBCHMA authority has requested that South Staffordshire provide additional safeguarded land for longer term unmet needs, nor has this been required in recent examinations in the GBBCHMA. Given these factors and the requirement in national</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							policy to review the plan in whole or in part every 5 years, it is not considered appropriate or necessary to release safeguarded land at this stage.  No change proposed.
RCA Regeneration for Barberry Developments	AGT24-036-01-02	Policy DS1	<p>We agree that Green Belt development should enhance access to outdoor sport and recreation, enhance landscape, visual amenity and biodiversity – as indeed many proposals within the Green Belt are capable of (including the subject site). We also agree with DS1 that where Very Special Circumstances can be demonstrated with regards to inappropriateness, planning permission should be granted. However, this is a difficult hurdle to get over and the most appropriate way to deliver large scale new housing is through a positively prepared local plan.</p> <p>We do not agree that affordable housing to meet local community needs should be “limited”, considering the significant and worsening affordable housing shortage within South Staffordshire, as demonstrated by the c.1,500 households on its social housing waiting list. South Staffordshire should look to encourage as many forms of affordable housing delivery as possible, including via Rural Exception Sites.</p>	No	No	No	<p>The Council does and will continue to work positively and proactively to enable the delivery of affordable housing in the district. This includes through the policies in this plan, but also in partnership with registered providers and Homes England.</p> <p>The need for rural exception sites to be ‘limited’ reflects criteria c) of Policy HC6 that requires that “the proposed development is proportionate in size and scale in relation to the existing settlement, having regard to its role in the settlement hierarchy”. This is considered appropriate to ensure the creation of mixed communities and to avoid large developments dominated by one tenure.</p> <p>No change proposed.</p>
RCA Regeneration for Seven Capital	AGT24-036-03-02	Policy DS1	<p>We agree that Green Belt development should enhance access to outdoor sport and recreation, enhance landscape, visual amenity and biodiversity – as indeed many proposals within the Green Belt are capable of (including the subject site). We also agree with DS1 that where Very Special Circumstances can be demonstrated with regards to inappropriateness, planning permission should be granted. However, this is a difficult hurdle to get over and the most appropriate way to deliver large scale new housing is through a positively prepared local plan.</p> <p>We do not agree that affordable housing to meet local community needs should be “limited”, considering the significant and worsening affordable housing shortage within South Staffordshire, as demonstrated by the c.1,500 households on its social housing waiting list. South Staffordshire should look to encourage as many forms of affordable housing delivery as possible, including via Rural Exception Sites.</p>	Not stated	No	No	<p>The Council does and will continue to work positively and proactively to enable the delivery of affordable housing in the district. This includes through the policies in this plan, but also in partnership with registered providers and Homes England.</p> <p>The need for rural exception sites to be ‘limited’ reflects criteria c) of Policy HC6 that requires that “the proposed development is proportionate in size and scale in relation to the existing settlement, having regard to its role in the settlement hierarchy”. This is considered appropriate to ensure the creation of mixed communities and to avoid large developments dominated by one tenure.</p> <p>No change proposed.</p>
RCA Regeneration for St Phillips	AGT24-036-04-02	Policy DS1	<p>We agree that Green Belt development should enhance access to outdoor sport and recreation, enhance landscape, visual amenity and biodiversity – as indeed many proposals within the Green Belt are capable of (including the subject site). We also agree with DS1 that where Very Special Circumstances can be</p>	Not stated	No	No	<p>The need for rural exception sites to be ‘limited’ reflects criteria c) of Policy HC6 that requires that “the proposed development is proportionate in size and scale in relation to the existing settlement, having regard to its role in the</p>

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			<p>demonstrated with regards to inappropriateness, planning permission should be granted. However, this is a difficult hurdle to get over and the most appropriate way to deliver large scale new housing is through a positively prepared local plan.</p> <p>We do not agree that affordable housing to meet local community needs should be "limited", considering the significant and worsening affordable housing shortage within South Staffordshire, as demonstrated by the c.1,500 households on its social housing waiting list. South Staffordshire should look to encourage as many forms of affordable housing delivery as possible, including via Rural Exception Sites.</p>				<p>settlement hierarchy". This is considered appropriate to ensure the creation of mixed communities and to avoid large developments dominated by one tenure.</p> <p>No change proposed.</p>
RCA Regeneration for Richborough Estates	AGT24-036-02-02	Policy DS1	<p>We agree that Green Belt development should enhance access to outdoor sport and recreation, enhance landscape, visual amenity and biodiversity – as indeed many proposals within the Green Belt are capable of (including the subject site). We also agree with DS1 that where Very Special Circumstances can be demonstrated with regards to inappropriateness, planning permission should be granted. However, this is a difficult hurdle to get over and the most appropriate way to deliver large scale new housing is through a positively prepared local plan.</p> <p>We do not agree that affordable housing to meet local community needs should be "limited", considering the significant and worsening affordable housing shortage within South Staffordshire, as demonstrated by the c.1,500 households on its social housing waiting list. South Staffordshire should look to encourage as many forms of affordable housing delivery as possible, including via Rural Exception Sites.</p>	Not stated	No	No	<p>The need for rural exception sites to be 'limited' reflects criteria c) of Policy HC6 that requires that "the proposed development is proportionate in size and scale in relation to the existing settlement, having regard to its role in the settlement hierarchy". This is considered appropriate to ensure the creation of mixed communities and to avoid large developments dominated by one tenure.</p> <p>No change proposed.</p>
Evolve Planning & Design for Bloor Homes	AGT24-017-01-03	Policy DS1	<p>It is agreed that Green Belt release is necessary to deliver a sustainable spatial strategy. Bloor Homes agrees that exceptional circumstances exist for this release.</p>	Not stated	Not stated	Not stated	Comments noted.
Berrys for John Davies Farms Ltd	AGT24-006-02-05	Policy DS1	<p>The Green Belt should also be altered through the Plan to accommodate development allocations on sites in Tier 4 settlements, to recognise the sustainability of those settlements, to protect and enhance their sustainable village centres and to meet housing needs during the Plan period, including the needs of the settlement and the requirement to provide 10% of housing growth on sites of less than 1 hectare. The Plan is therefore considered to be unsound as it fails to meet the development needs of Tier 4 settlements and is inconsistent with the national policy requirement (detailed in paragraph 70 of the National Planning Policy Framework) to promote the development of a good mix of sites, including identifying land to accommodate at least 10% of the housing requirement on sites no larger than one hectare.</p>	Not stated	No	Not stated	<p>Development in Tier 4 settlements is limited to "very limited windfall housing growth to assist in safeguarding the limited services and facilities in each village and to address local housing needs", in accordance with Policy DS5.</p> <p>Given the limited services and facilities available in these settlements and their lack of sustainability credentials (as evidenced by our Rural Services and Facilities Audit 2021), it is not considered appropriate to allocate sites at these settlements.</p> <p>The council can already meet its duty to accommodate at least 10% of the housing</p>

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							<p>requirement on sites no larger than one hectare without allocating additional small sites at Tier 4 settlements.</p> <p>No change proposed.</p>
RPS Group for IM Land	AGT24-037-01-02	Policy DS1	The revised policy now proposes a reduced number of Green Belt releases and, notably, does not propose any additional safeguarded land to replace those sites safeguarded for development in the Site Allocations DPD (2018). The Council asserts that the spatial strategy is 'positively prepared' (Exceptional Circumstances Topic Paper 2024, para 3.10). RPS strongly disputes this assertion.	Not stated	No	Not stated	<p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper (2024) and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The Council considers that it would be inappropriate to release additional land from the Green Belt for safeguarded land through this Local Plan, given the need for any such release to be justified by exceptional circumstances.</p> <p>It is acknowledged that the approach to future Green Belt release will be considered through an updated Strategic Growth Study across the GBBCHMA which South Staffordshire will be an active partner in, and it is right to consider this issue strategically across this wider functional geography. To date, no GBBCHMA authority has requested that South Staffordshire provide additional safeguarded land for longer term unmet needs, nor has this been required in recent examinations in the GBBCHMA. Given these factors and the requirement in national policy to review the plan in whole or in part every 5 years, it is not considered appropriate or necessary to release safeguarded land at this stage.</p> <p>No change proposed.</p>
RPS Group for IM Land	AGT24-037-01-02	Policy DS1	RPS agrees that exceptional circumstances exist to justify the release of green belt land for housing. However, the revised EC topic paper only considers exceptional circumstances as being justified in respect of Tier 1 settlements. This excludes consideration of Tier 2 settlements, including Huntington, despite Tier 2 settlements being identified under the Council's preferred capacity-led strategy (Option I). The revised EC topic paper is incorrect and exceptional circumstances should extend to Tier 2 settlements.	Not stated	No	Not stated	<p>The Council considers that its approach to Green Belt land is consistent with national planning policy, demonstrating exceptional circumstances in a manner consistent with NPPF requirements.</p> <p>The Exceptional Circumstances Topic Paper 2024 sets out the council's exceptional circumstances for proposed green belt release, considering both the strategic and site-specific considerations. As</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							the spatial strategy focuses green belt release on our most sustainable tier 1 settlements, site specific consideration of tier 2 settlements through the topic paper was not required.
Pegasus Group for Richborough Estates	AGT24-030-05-02	Policy DS1	<p>Policy DS1 as currently drafted is unsound and does not meet with the provisions of the NPPF Paragraph 35. It has been demonstrated that there are clear exceptional circumstances for the release of Green Belt land to meet the unmet housing needs of the GBBCHMA. The delivery of 640 homes is not however considered to be a proportionate contribution towards meeting this need. In addition, there are additional Green Belt sites suitable and available for housing which are sustainably located and will contribute further to meeting this need as well as addressing other issues and challenges identified within the District. The Green Belt boundary should therefore be amended further to enable the release of additional Green Belt sites, such as land west of Wrottesley Park Road.</p> <p>Richborough consider the 2024 Publication Plan should establish Green Belt boundaries which will not require amendment in the next Local Plan cycle through the introduction of safeguarded land. Richborough continues to advocate the importance and suitability of a growth corridor focused around the broad location of the A449 and West Coast Mainline between Wolverhampton and Stafford.</p> <p>The wording of the policy should therefore be revisited ensuring:</p> <ol style="list-style-type: none"> <li>1) It makes reference to an early Plan Review</li> <li>2) It recognises the full extent of the housing shortfall in the GBBCHMA through a significant housing contribution through the Plan period having regard to its contiguous border with the West Midlands Conurbation under the Duty to Cooperate.</li> <li>3) Amend Green belt boundary to address the sub regional issues, allow boundary to ensure and introduce safeguarded land.</li> </ol>	Yes	No	Yes	<p>Justification for the council’s spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district’s growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan’s ability to deliver housing growth.</p> <p>The Council considers that it would be inappropriate to release additional land from the Green Belt for safeguarded land through this Local Plan, given the need for any such release to be justified by exceptional circumstances.</p> <p>It is acknowledged that the approach to future Green Belt release will be considered through an updated Strategic Growth Study across the GBBCHMA which South Staffordshire will be an active partner in, and it is right to consider this issue strategically across this wider functional geography. To date, no GBBCHMA authority has requested that South Staffordshire provide additional safeguarded land for longer term unmet needs, nor has this been required in recent examinations in the GBBCHMA. Given these factors and the requirement in national policy to review the plan in whole or in part every 5 years, it is not considered appropriate or necessary to release safeguarded land at this stage.</p> <p>It is not considered necessary to specifically commit to an early review of the plan as a review of the plan to ensure it is kept up to date is already a requirement of national guidance.</p> <p>No change proposed.</p>
Turley Associates for Bellway Homes Ltd	AGT24-041-01-02	Policy DS1	Please refer to our previous representations made in December 2022 on this matter at Appendix 1. The core theme of the Publication Plan is protecting the Green Belt which is emphasised by the removal of many proposed GB sites. This is based on a fundamental misinterpretation of Paragraph 145 and 230 of the	No	No	No	Justification for the council’s spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper



**CHAPTER 5 & POLICIES DS1-DS5: DEVELOPMENT STRATEGY AND SUPPORTING TEXT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			NPPF. This notwithstanding, we have no in principle concern in respect of the wording of draft policy DS1 itself and support the plan as a whole, however we emphasise the importance of reconsidering the approach to reviewing the Green Belt.				2024.This balances the district’s growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan’s ability to deliver housing growth.  No change proposed.
Zesta Planning for Completelink Ltd	AGT24-046-01-01	DS1	It is clear there will be a very substantial unmet need for registered care, and that some of this need would have to be met at sites in the Green Belt. We consider policy DS1 unsound as it does not remove enough land from the Green Belt to accommodate the evidenced needs for specialist housing and care accommodation. It would not be positively prepared in that it does not facilitate a development strategy which meets the area’s evidenced needs. It would not be consistent with national policy as it does not do enough to address the needs for older people.	Not stated	No	Not stated	Allocations for specialist housing are being made in the Local Plan, as set out in the Homes for Older and Disabled People Topic Paper. The Council considers that this, in combination with the positive wording of Policy HC5 to encourage and support the provision of specialist housing developments, is sufficient contribution to meeting need. The Council also will continue to work proactively with the County Council and Registered Providers to explore opportunities for new provision. The Council is confident that this combination of approaches will deliver sufficient levels of appropriate housing to meet the needs of older and disabled people over the plan period. Further information on this is provided in the Homes for Older and Disabled People Topic Paper (section 3).  No change proposed.
Zesta Planning for Completelink Ltd	AGT24-046-01-01	Policy DS1	As an alternative approach for realising opportunity presented by Prestwood House Care Home & Estate to address the unmet needs for specialist housing, it is suggested that a special policy area could be designated around the site, within which proposals for the redevelopment and intensification of the site to provide specialist housing will be supported where they would contribute towards meeting the needs for these types of accommodation. It could then remain in the Green Belt whilst enabling its careful re-intensification. Details of similar approaches can be found in paragraphs 2.54 – 2.68 of the full representation.	Not stated	No	Not stated	The Council considers delivery of specialist housing within existing settlements in line with Policy DS5 and Policy HC5, through strategic allocations and windfall opportunities, to be the most appropriate approach in ensuring schemes are in sustainable locations.  No change proposed.
CPRE West Midlands Regional Group	STA24-014-02	Policy DS1	Object to the amendment of Green Belt boundaries to accommodate development allocations set out in Policies SA1, SA2 and SA3. Independent CPRE report on housing numbers suggests a surplus of 2292 homes in the plan. We do not consider that ‘exceptional circumstances’ have been met to justify the release of Green Belt land.	Not stated	Not stated	Not stated	The CPRE report on housing numbers suggests that the Local Plan has a surplus of 2292 homes against its Local Plan target.  This oversupply is made up of four elements:  1. The CPRE report suggests that a much larger windfall allowance should be used (1,500 rather than 600 across the plan period). The Council consider that although 600 represents a conservative



**CHAPTER 5 & POLICIES DS1-DS5: DEVELOPMENT STRATEGY AND SUPPORTING TEXT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							<p>figure (as shown in the Council’s 2024 SHELAA), an such a reliance on windfall permissions to meet the Local Plan target would not be appropriate and not provide the certainty that the housing target will be met. A windfall allowance of 600 dwellings across the plan period represents the appropriate balance.</p> <ol style="list-style-type: none"> <li>2. The CPRA report suggests that a past oversupply of 360 dwellings leading up to the plan period should be taken into account. The Council consider that the Plan should seeks to meet its housing requirement without relying on past over supply.</li> <li>3. The CPRE report suggest that there is no need for the Plan to provide an over-supply or headroom above the local plan requirement. The Council consider it best practise that a degree of headroom is provided to ensure the housing requirement will be met across the plan period.</li> <li>4. The CPRE report suggests that South Staffordshire should not contribute the proposed 640 dwellings to meet the unmet needs of the Birmingham and Black Country. South Staffordshire consider theta 640 dwellings is an appropriate contribution based on its capacity-led spatial strategy.</li> </ol>
Pegasus Group for Richborough Estates	AGT24-030-05-02	Policy DS1	DS1 is broadly in line with the relevant paragraphs in the NPPF and is therefore supported. However, Richborough do not accept the Council’s proposition that Green Belt ‘contributes towards rural character’. Green Belt is a development restraint policy set out at Chapter 13 of the NPPF and therefore the Council should amend the text in DS1 and its supporting text to represent national policy.	Yes	No	Yes	<p>Reference to green belt contributing to the districts rural character is detailed in the supporting text (paragraph 5.1) and not the policy itself. It is accepted that Green Belt is a development restraint policy, however this statement reflects that as the district is 80% Green Belt the designation acts as a policy restraint on development covering a substantial part of the district, which is largely of rural character. Hence the designation does have the effect of preserving this rural character, even if this is not one of the intended purposes.</p> <p>No change proposed.</p>

**CHAPTER 5 & POLICIES DS1-DS5: DEVELOPMENT STRATEGY AND SUPPORTING TEXT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
Pegasus Group for Richborough Estates	AGT24-030-05-02	Policy DS1	The Council are of the view that the Growth Study, on which the 4,000 contribution to the HMA was based, is out of date. Details on the HMA and shortfalls for other LA's can be found in paragraphs 4.4 – 4.7 of the full representation. The Green Belt Exceptional Circumstances Topic Paper 2024 continues to acknowledge the exceptional circumstances for the release of Green Belt land, however, in terms of delivering housing for the District and HMA, this continues to focus on non-Green Belt options. Only 0.16% of the district's Green Belt is proposed for release despite the significant unmet need for the HMA. There are clear opportunities for sustainable housing development across the district through Green Belt release whilst ensuring a significant quantum of high value Green Belt land is protected.	Yes	No	Yes	Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.
Pegasus Group for Richborough Estates	AGT24-030-05-02	Policy DS1	SSDC clearly recognise the scale of the housing shortfall. Since consultation on the 2022 Publication Plan, the housing shortfall across the HMA has grown further. SSDC's reduced contribution of 640 homes is not reflective of the significant housing shortfall. The direct relationship between SSDC, Dudley and Wolverhampton provides further support for the release of Green Belt land.	Yes	No	Yes	Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.  A contribution to unmet needs of authorities in the Housing Market Area is being provided in addition to meeting our own housing needs, in accordance with what the council considers to be an appropriate strategy. Ongoing cooperation with Duty to Cooperate bodies has taken place and informed the plans strategic approach, as detailed in our Duty to Cooperate Topic Paper. Emerging Statements of Common Ground are being prepared with all neighbouring and HMA authorities to reflect our respective positions.
Pegasus Group for Richborough Estates	AGT24-030-05-02	Policy DS1	Richborough consider the 2024 Publication Plan should establish Green Belt boundaries which will not require amendment in the next Local Plan cycle through the introduction of safeguarded land. This would give the Council greater flexibility to accommodate development requirements and to assist in meeting a growing unmet need. Richborough continues to advocate the importance of a growth corridor focused around the A449 and West Coast Mainline.	Yes	No	Yes	The Council considers that it would be inappropriate to release additional land from the Green Belt for safeguarded land through this Local Plan, given the need for any such release to be justified by exceptional circumstances.  It is acknowledged that the approach to future Green Belt release will be considered through an updated Strategic Growth Study across the GBBCHMA which South Staffordshire will be an active partner in, and it is right to consider this issue strategically across this wider functional geography. To date, no GBBCHMA authority has

**CHAPTER 5 & POLICIES DS1-DS5: DEVELOPMENT STRATEGY AND SUPPORTING TEXT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							<p>requested that South Staffordshire provide additional safeguarded land for longer term unmet needs, nor has this been required in recent examinations in the GBBCHMA. Given these factors and the requirement in national policy to review the plan in whole or in part every 5 years, it is not considered appropriate or necessary to release safeguarded land at this stage.</p> <p>It is already the case that the A449/WCML is a key growth corridor with significant housing and strategic employment land proposed.</p> <p>No change proposed.</p>
Pegasus Group for Richborough Estates	AGT24-030-05-02	Policy DS1	DS1 is unsound and does not meet with the provisions of the NPPF. It has been demonstrated that there are clear exceptional circumstances for the release of Green Belt land. The delivery of 640 homes is not considered proportionate.	Yes	No	Yes	<p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>No change proposed.</p>
Berrys for Bradford Estates	AGT24-006-01-02	Policy DS1	<p>LATE SUBMISSION -</p> <p>Policy DS1 makes no reference to limited infilling, this is not consistent with National Policy, specifically Paragraph 154. Policy DS1 should include limited infilling in villages which would enable tier 4 and tier 5 villages to receive some level of growth to support and enhance community facilities and services in these settlements. HC2 also omits infilling from tier 4 and 5, this is inconsistent with the rural maintain and enhance principles contained within the National Planning Policy Framework.</p> <p>Tier 4 and tier 5 villages should be allocated growth where they would not give rise to the 'high' or 'very high' levels of harm. Such a change would plan positively for the provision of housing sites of less than one hectare, contribute in delivering the housing requirement, meets the needs and contributes to the</p>	Yes	No	Yes	<p>It is not considered necessary to repeat national Green Belt policy. Very limited growth permitted at tier 4 and 5 settlements that is commensurate to their sustainability credentials is detailed in Policy DS5.</p> <p>No change proposed.</p>

**CHAPTER 5 & POLICIES DS1-DS5: DEVELOPMENT STRATEGY AND SUPPORTING TEXT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			sustainability of lower tier settlements and is justified in releasing land from the Green Belt.				
Pegasus Group for Clowes Developments	AGT24-030-02-02	Policy DS1	DS1 is broadly in line with the relevant paragraphs in the NPPF and is therefore supported. However, Clowes do not accept the Council's proposition that Green Belt 'contributes towards rural character'. Green Belt is a development restraint policy set out at Chapter 13 of the NPPF and therefore the Council should amend the text in DS1 and its supporting text to represent national policy.	Not stated	No	No	Reference to green belt contributing to the districts rural character is detailed in the supporting text (paragraph 5.1) and not the policy itself. It is accepted that Green Belt is a development restraint policy, however this statement reflects that as the district is 80% Green Belt the designation acts as a policy restraint on development covering a substantial part of the district, which is largely of rural character. Hence the designation does have the effect of preserving this rural character, even if this is not one of the intended purposes.  No change proposed.
Pegasus Group for Clowes Developments	AGT24-030-02-02	Policy DS1	The Council are of the view that the Growth Study, on which the 4,000 contribution to the HMA was based, is out of date. Details on the HMA and shortfalls for other LA's can be found in paragraphs 5.3 – 5.8 of the full representation. The Green Belt Exceptional Circumstances Topic Paper 2024 continues to acknowledge the exceptional circumstances for the release of Green Belt land, however, in terms of delivering housing for the District and HMA, this continues to focus on non-Green Belt options. Only 0.16% of the district's Green Belt is proposed for release despite the significant unmet need for the HMA. There are clear opportunities for sustainable housing development across the district through Green Belt release whilst ensuring a significant quantum of high value Green Belt land is protected.  SSDC clearly recognise the scale of the housing shortfall. Since consultation on the 2022 Publication Plan, the housing shortfall across the HMA has grown further. SSDC's reduced contribution of 640 homes is not reflective of the significant housing shortfall. SSDC has the ability to make a significant contribution to unmet needs as it has a contiguous border with the West Midlands conurbation. The eastern edge of SSDC adjoins the local authority areas of Dudley and Wolverhampton with key infrastructure links running through. This provides further support for the release of Green Belt land and Clowes consider that land at Himley should be removed via the exceptional circumstances test and a new boundary redrawn. Clowes has considered the implications of the release from the Green Belt in paragraphs 5.16 – 5.20 of the full residential representation, with further arguments towards the release of the site in paragraphs 5.21 – 5.26.	Not stated	No	No	Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.  Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.  The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).  No change proposed.

**CHAPTER 5 & POLICIES DS1-DS5: DEVELOPMENT STRATEGY AND SUPPORTING TEXT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			DS1 is unsound and does not meet with the provisions of the NPPF. It has been demonstrated that there are clear exceptional circumstances for the release of Green Belt land. The delivery of 640 homes is not considered proportionate. In addition, there are Green Belt sites suitable and available for housing that are sustainably located and will contribute to meeting this need.				
Pegasus Group for Clowes Developments	AGT24-030-02-02	Policy DS1	It is inevitable that any land identified for employment land overspill have to take place on greenfield sites within the Green Belt where they are in a sustainable location. There are locational benefits of the land at Wall Heath in terms of its size, containment, and ability to meet employment floorspace needs for local businesses. If an alternative location in close proximity to Pensnett Trading Estate and Heathmill Road Trading Estate is not found, jobs will be lost when business relocate. Clowes has considered the implications of the release from the Green Belt in paragraphs 5.8 – 5.11 of the full employment representation, with further arguments towards the release of the site in paragraphs 5.12 – 5.15.	No	No	No	Reasonable alternative employment site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Economic Strategy and Site Assessment Topic Paper 2024. The Council can meet its employment land requirement and make a proportionate contribution to cross boundary needs without release of Green Belt, and therefore the exceptional circumstances for its release do not exist as detailed in our Exceptional Circumstances Topic Paper 2024.
Pegasus Group for St Philips	AGT24-032-07-02	Policy DS1	St Philips do not accept the Council's proposition that Green Belt 'contributes towards rural character'. Green Belt is a development restraint policy set out at Chapter 13 of the NPPF and therefore the Council should amend the text in DS1 and its supporting text to represent national policy.	Yes	No	Not stated	Reference to green belt contributing to the districts rural character is detailed in the supporting text (paragraph 5.1) and not the policy itself. It is accepted that Green Belt is a development restraint policy, however this statement reflects that as the district is 80% Green Belt the designation acts as a policy restraint on development covering a substantial part of the district, which is largely of rural character. Hence the designation does have the effect of preserving this rural character, even if this is not one of the intended purposes.  No change proposed.
Pegasus Group for St Philips	AGT24-032-07-02	Policy DS1	The Council are of the view that the Growth Study, on which the 4,000 contribution to the HMA was based, is out of date. Details on the HMA and shortfalls for other LA's can be found in paragraphs 4.4 – 4.7 of the full representation. The Green Belt Exceptional Circumstances Topic Paper 2024 continues to acknowledge the exceptional circumstances for the release of Green Belt land, however, in terms of delivering housing for the District and HMA, this continues to focus on non-Green Belt options. Only 0.16% of the district's Green Belt is proposed for release despite the significant unmet need for the HMA. There are clear opportunities for sustainable housing development across the district through Green Belt release whilst ensuring a	Yes	No	Not stated	Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.  It is acknowledged that the approach to future Green Belt release will be considered through an updated Strategic Growth Study across the



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**CHAPTER 5 & POLICIES DS1-DS5: DEVELOPMENT STRATEGY AND SUPPORTING TEXT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>significant quantum of high value Green Belt land is protected.</p> <p>SSDC clearly recognise the scale of the housing shortfall. Since consultation on the 2022 Publication Plan, the housing shortfall across the HMA has grown further. SSDC's reduced contribution of 640 homes is not reflective of the significant housing shortfall. The direct relationship between SSDC, Dudley and Wolverhampton provides further support for the release of Green Belt land. St Philips consider the 2024 Publication Plan should establish Green Belt boundaries which will not require amendment in the next Local Plan cycle through the introduction of land. This would give the Council greater flexibility to accommodate development requirements and to assist in meeting a growing unmet need.</p> <p>DS1 is unsound and does not meet with the provisions of the NPPF. It has been demonstrated that there are clear exceptional circumstances for the release of Green Belt land. The delivery of 640 homes is not considered proportionate. There are additional Green Belt sites suitable and available for housing which are sustainably located.</p>				<p>GBBCHMA which South Staffordshire will be an active partner in, and it is right to consider this issue strategically across this wider functional geography. To date, no GBBCHMA authority has requested that South Staffordshire provide additional safeguarded land for longer term unmet needs, nor has this been required in recent examinations in the GBBCHMA. Given these factors and the requirement in national policy to review the plan in whole or in part every 5 years, it is not considered appropriate or necessary to release safeguarded land at this stage.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>No change proposed.</p>
Pegasus Group for Persimmon Homes	AGT24-032-04-01	Policy DS1	DS1 remains broadly consistent with the provisions of the NPPF. In reviewing the Green Belt, the previous iteration of the Plan accommodated a much larger number of allocations, this has been significantly reduced. Having been previously removed from the Green Belt and identified as safeguarded land, the proposed allocation of Cherrybrook Drive offers an excellent opportunity to deliver new homes.	Not stated	No	Not stated	Comments noted.
Pegasus Group for Taylor Wimpey	AGT24-032-08-02	Policy DS1	DS1 remains broadly consistent with the provisions of the NPPF. In reviewing the Green Belt, the previous iteration of the Plan accommodated a much larger number of allocations, this has been significantly reduced. Having been previously removed from the Green Belt and identified as safeguarded land, the proposed allocation of Pool House Road offers an excellent opportunity to deliver new homes.	Not stated	No	Not stated	Comments noted.
Home Builders Federation	STA24-024-02	Policy DS1	<p>Policy DS1 is unsound because it is not positively prepared, is not effective or justified, and does not comply with national policy.</p> <p>Although HBF is supportive of changes to the Green Belt boundary that will enable housing allocations to be brought forward, we believe additional changes are needed to the policy because additional housing allocations including green belt releases are required to meet the housing needs of South</p>	No	No	No	Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.



**CHAPTER 5 & POLICIES DS1-DS5: DEVELOPMENT STRATEGY AND SUPPORTING TEXT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>Staffordshire and the wider HMA.</p> <p>Planning policy must be made through the Local Plan process. This is subject to mandatory requirements for public consultation and independent scrutiny through the Examination process. If the Council wish to provide additional advice on the interpretation of any policy, this should be done through a Supplementary Planning Document, which is prepared and consulted on after the Local Plan policy has been adopted. Any reference to any future SPD should be moved from the policy to the supporting text.</p>				<p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>It is accepted that the future Green Belt SPD will only provide guidance on the policy. Considered that reference to it in the policy adds clarity for applicants that they should consider this guidance when formulating their proposals. There is a risk that this could be missed if it is moved to the supporting text.</p> <p>No change proposed.</p>
Cashmore, P & R	RES24-036-03	Policy DS1	<p>5.51 states that the analysis of South Staffordshire's social-economic landscape was healthy and was still benefiting from investment particularly as a result of strategic site delivery in the district. There is already a surplus land (excluding WMI) so dispute adding a further 17.6ha of potential pipeline land at J13, making the surplus even greater.</p> <p>The WMI Order identified the site as unsuitable, this concluded that 'the combined impacts on Dunston's rural character, as well as the effects on the local amenity, make the site unsuitable. This was submitted in 2019 and the area has the same character and local amenities.</p>	No	No	No	<p>The proposed allocation at M6, Junction 13 has been proposed for allocation based on a balanced judgement having regard to a number of considerations and covered in our Economic Strategy and Site Assessment Topic Paper 2024. These include site specific credentials and that it is the only significant site that has been put forward at a key motorway junction in the district on land outside of the Green Belt; shortfalls of employment land in the wider FEMA; and regional evidence of strong demand. Allocating M6 Junction to compliment other sites in the pipeline ensures a strategy that positively and proactively encourages sustainable economic growth.</p> <p>The applicants for WMI did consider a much wider land parcel at Dunston as part of their alternative site assessment and discounted it, however this was for very large scale SFRI and therefore is not comparable.</p> <p>No change proposed.</p>
Brewood Civic Society	STA24-008-03	Policy DS1	Brewood Civic Society support Policy DS1 - Green Belt Protection of the Green Belt from Inappropriate Development is very important to the surrounding area of Brewood.	Not stated	Not stated	Not stated	Support noted.
Hughes, K	RES24-114-01	Policy DS1	Support this plan for small rural exception sites that provide housing for local people with strong connections to the community in conjunction with the other local plan policies.	Not stated	Not stated	Not stated	Support noted.
JMS Planning for Wolverhampton	AGT24-023-01-	Policy DS1	Local planning policy should not replicate national policy and reference to the exceptions (at paragraph 154 and 155) to	Not stated	Not stated	Not stated	It will be for development management case officers to weigh up Green Belt policy against

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
Halfpenny Green Airport	01		inappropriate development in the Green Belt is welcomed. Following the NPPF's invitation for LPAs to set rural exception policy, reference in DS1 to Policy HC6 is also supported. JMS Planning suggests however that reference – whether in policy or supporting text – to boosting the rural economy is made here, given that 80% of South Staffordshire is located within the Green Belt. It is unclear how applicants should interpret how policies related to the Green Belt (i.e., DS1), rural diversification (EC4), rural businesses (such as Halfpenny Green Policy EC10) and NPPF exceptions to inappropriate development in the Green Belt interact. In accordance with the requirements of the NPPF paragraph 145 and 146, we are satisfied that exceptional circumstances do exist to release the Green Belt but that there are some issues with the assessment undertaken in relation to Halfpenny Green Airport (picked up later in the rep).				provisions in other policies covering rural diversification and the rural economy in the planning balance.  No change proposed.
<b>POLICY DS2: GREEN BELT COMPENSATORY IMPROVEMENTS</b>							
Pegasus Group for Taylor Wimpey	AGT24-032-08-02	Policy DS2	Taylor Wimpey supports the inclusion of a policy setting out the need for Green Belt compensation in relation to sites being removed from the Green Belt. However, the policy contains elements of ambiguity, and its practical application is unclear. The policy requires further clarification by identifying and naming which particular sites it is specifically intended to apply to.	Not stated	No	Not stated	The policy sets out a stepped approach to identifying compensatory improvements in the Green Belt, allowing flexibility to respond to site specific opportunities and the wider area context in providing Green Belt compensatory improvements. This is considered to strike an appropriate balance between allowing flexibility for site specific circumstances whilst providing a clear process for developers to follow.  It is already clear from the policy that it applies to sites removed from the green belt through the local plan, and therefore it is not considered necessary to reference these sites in the policy itself.  No change proposed.
Pegasus Group for Persimmon Homes	AGT24-032-04-01	Policy DS2	Despite representations set out in the 2022 Publication Plan consultation, the policy still leaves elements of ambiguity and its practical application is unclear. The policy should identify and name which particular sites it is intended to apply to, or alternatively, the individual site allocation proformas should identify when it is expected this policy would apply.	Not stated	No	Not stated	The policy sets out a stepped approach to identifying compensatory improvements in the Green Belt, allowing flexibility to respond to site specific opportunities and the wider area context in providing Green Belt compensatory improvements. This is considered to strike an appropriate balance between allowing flexibility for site specific circumstances whilst providing a clear process for developers to follow.  It is already clear from the policy that it applies to sites removed from the green belt through the local plan, and therefore it is not considered

**CHAPTER 5 & POLICIES DS1-DS5: DEVELOPMENT STRATEGY AND SUPPORTING TEXT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							necessary to reference these sites in the policy itself.  No change proposed.
Pegasus Group for Richborough Estates	AGT24-030-05-02	Policy DS2	<p>Richborough supports the inclusion of a policy setting out the need for Green Belt compensation in relation to sites being removed from the Green Belt. However, despite representations in the 2022 Publication Plan, the policy still leaves elements of ambiguity, and its practical application is unclear.</p> <p>The hierarchical approach to the Green Belt compensation policy as drafted is not supported. Neither the NPPF or PPG refer to a hierarchy or preferred methods of compensation. It appears that all the potential methods require some method of actually delivering the compensation. In practical terms this is likely to be via a S106 agreement associated with a planning permission to develop the allocation. Whilst it is accepted that having the Green Belt compensation close to the allocation could be advantageous, it is the overall value of that improvement which is of greatest significance. There is also potential for the lowest ranked element of the hierarchy to result in the same, or greater, benefit than compensation associated with the highest rank.</p> <p>The policy is considered unsound as it is neither justified nor consistent with national policy. The policy should be amended to delete the hierarchy and instead state that Green Belt compensation is required in conjunction with development of sites removed from the Green Belt.</p>	Yes	No	Yes	<p>The policy sets out a stepped approach to identifying compensatory improvements in the Green Belt, allowing flexibility to respond to site specific opportunities and the wider area context in providing Green Belt compensatory improvements. This is considered to strike an appropriate balance between allowing flexibility for site specific circumstances whilst providing a clear process for developers to follow.</p> <p>It is considered that Green Belt compensatory measures should seek to benefit nearby residents who are most directly impacted by the loss of Green Belt and therefore the stepped approach is appropriate.</p> <p>No change proposed.</p>
Walsall Council	STA24-049-01	Policy DS2	This policy should refer to the specific sites that the policy will apply to.	Not stated	Not stated	Not stated	<p>It is already clear from the policy that it applies to sites removed from the green belt through the local plan, and therefore it is not considered necessary to reference these sites in the policy itself.</p> <p>No change proposed.</p>
Goldfinch Town Planning Services	AGT24-020-01-01	Policy DS2	<p>Indent c - Nature Recovery Network Mapping: We continue to object to the proposed use of the Nature Recovery Network Mapping. This ecological network mapping is too vague, provides weak technical evidence, is insufficiently robust, meaningless and unclear, and will therefore fail to effectively inform Local Plan preparation with a suitably robust policy approach. It will also fail to respond effectively to wildlife corridor/ ecological network focused guidance as set out in paragraphs 102, 157 - 158, 180, 185 of the Revised NPPF (December 2023).</p>	No	No	No	<p>The Council's Nature Network Recovery Mapping provides a useful reference for where Green Belt compensatory measures could be directed should opportunities under criteria (a) and (b) of the policy not be identified as it identifies a hierarchy of potential project areas.</p> <p>No change proposed.</p>

Submission Local Plan Review  
Schedule of Publication Plan 2024 Representations and Responses

**CHAPTER 5 & POLICIES DS1-DS5: DEVELOPMENT STRATEGY AND SUPPORTING TEXT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
First City for St Mary's Presbytery and The Archdiocese of Birmingham	AGT24-018-01-02	Policy DS2	Further guidance is required in connection to the amount of compensation required and how that will be calculated. Appendix B- F should be amended to make clear which sites this proposed policy could potentially apply to.	No	No	No	The policy makes it clear that improvement should be proportionate and so this will be considered on a case-by-case basis.  It is already clear from the policy that it applies to sites removed from the green belt through the local plan, and therefore it is not considered necessary to reference these sites in the policy itself.  No change proposed.
Acres Land and Planning for Hallam Land Management	AGT24-001-01-01	Policy DS2	We acknowledge the fact that where green belt incursions are made through the Local Plan review that there should be compensatory improvements (to meet national policy advice within the NPPF) albeit that these need to be feasible and capable of delivery within the green belt policy advise to enable the site to be released and therefore we would support this policy in principle	Not stated	Not stated	Not stated	Support noted.
Avison Young for Beard, G	AGT24-004-01-02	Policy DS2	Our client objects to the policy as drafted. 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.	No	No	No	The NPPF is clear that compensatory improvements are required where Green Belt release is proposed. It is therefore considered that this policy is necessary, and without it, could render Green Belt allocations non-compliant with the NPPF.
RCA Regeneration for Barberry Developments	AGT24-036-01-02	Policy DS2	Despite paragraphs 147 and 148 of the latest NPPF, we disagree that Green Belt proposals must require "compensatory improvements" in order to gain planning consent. We instead agree with motion set by paragraph 57 that requires contributions to be necessary to make development acceptable in planning terms, directly related to the development and related in scale and kind.  We further question whether these further obligations have been tested within South Staffordshire's evidence base with regards to financial viability. The cost of these compensatory improvements must be tested against existing assumptions for developer contributions, to ensure financial viability	No	No	No	The NPPF is clear that compensatory improvements are required where Green Belt release is proposed. It is therefore considered that this policy is necessary, and without it, could render Green Belt allocations non-compliant with the NPPF.  Green Belt compensatory improvements have been tested as part of the Local Plan Viability Study. This is confirmed in the Further Note on Viability: Follow-up to Regulation 19 Consultation (November 2024).
RCA Regeneration for Seven Capital	AGT24-036-03-02	Policy DS2	Despite paragraphs 147 and 148 of the latest NPPF, we disagree that Green Belt proposals must require "compensatory improvements" in order to gain planning consent. We instead agree with motion set by paragraph 57 that requires contributions to be necessary to make development acceptable in planning terms, directly related to the development and	Not stated	No	No	The NPPF is clear that compensatory improvements are required where Green Belt release is proposed. It is therefore considered that this policy is necessary, and without it, could render Green Belt allocations non-compliant with the NPPF.

**CHAPTER 5 & POLICIES DS1-DS5: DEVELOPMENT STRATEGY AND SUPPORTING TEXT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			related in scale and kind.  We further question whether these further obligations have been tested within South Staffordshire's evidence base with regards to financial viability. The cost of these compensatory improvements must be tested against existing assumptions for developer contributions, to ensure financial viability				Green Belt compensatory improvements have been tested as part of the Local Plan Viability Study. This is confirmed in the Further Note on Viability: Follow-up to Regulation 19 Consultation (November 2024).
RCA Regeneration for St Phillips	AGT24-036-04-02	Policy DS2	Despite paragraphs 147 and 148 of the latest NPPF, we disagree that Green Belt proposals must require "compensatory improvements" in order to gain planning consent. We instead agree with motion set by paragraph 57 that requires contributions to be necessary to make development acceptable in planning terms, directly related to the development and related in scale and kind.  We further question whether these further obligations have been tested within South Staffordshire's evidence base with regards to financial viability. The cost of these compensatory improvements must be tested against existing assumptions for developer contributions, to ensure financial viability	Not stated	No	No	The NPPF is clear that compensatory improvements are required where Green Belt release is proposed. It is therefore considered that this policy is necessary, and without it, could render Green Belt allocations non-compliant with the NPPF.  Green Belt compensatory improvements have been tested as part of the Local Plan Viability Study. This is confirmed in the Further Note on Viability: Follow-up to Regulation 19 Consultation (November 2024).
Evolve Planning & Design for Bloor Homes	AGT24-017-01-09	Policy DS2	Land East of Bilbrook - Bloor Homes recognises that the Local Plan should set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements. The proposal for land east of Bilbrook identifies adjacent land to provide these improvements.	Not stated	Not stated	Not stated	Comments noted.
Savills UK Ltd for Clowes Developments	AGT24-038-02-01	Policy DS2	Clowes object to DS2 as written because it does not accord with national policy and is therefore not justified. The policy should accord with the wording of the PPG - "informed by supporting evidence of landscape, biodiversity or recreational needs and opportunities..." Compensatory improvements should not necessarily have to improve access, landscape AND biodiversity.	Yes	No	Yes	Policy DS2 does not specify that compensatory improvements should have to improve access, landscape AND biodiversity and provides flexibility to developers by offering a stepped approach that can respond to site specific circumstances.  No change proposed.
Turley Associates for Bellway Homes	AGT24-042-01-02	Policy DS2	Please refer to our previous representations made in December 2022 on this matter at Appendix 1. The policy is considered to align with NPPF paragraph 147. Sufficient flexibility is provided by the policy where contributions could be provided in lieu of a specific scheme being identified, which is supported. As such, it is considered to be sound.	No	Yes	No	Support noted.
First City Ltd for UKPI Ltd	AGT24-018-02-01	Policy DS2	Paragraphs 147 of the NPPF makes comments about reviewing Green Belt boundaries and promoting substantive patterns of development. No further guidance is provided as to what this would entail or how this should be provided/maintained and determined if there is a threshold/quantity that should be provided. Policy DS2 advises on compensatory improvements	Not stated	Not stated	Not stated	The policy sets out a stepped approach to identifying compensatory improvements in the Green Belt, allowing flexibility to respond to site specific opportunities and the wider area context in providing Green Belt compensatory improvements. This is considered to strike an



**CHAPTER 5 & POLICIES DS1-DS5: DEVELOPMENT STRATEGY AND SUPPORTING TEXT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			being incorporated into Section 106 agreements and sets out a hierarchy of where this can be accommodated. There is also reference to a commuted sum being suggested in some instances. However, there is no indication as to what the amount of compensation either monetary or otherwise would be. We consider this should not apply to previous safeguarded land allocated for future development from previous plans brought forward to the emerging Local Plan. We have received confirmation of this following a conversation with Policy officers however, we consider this should be made clear within the text of the Local Plan. All sites which this applies to should be notified and the compensatory provision set out in Appendix B – F of the local plan as part of the key requirements. Further guidance at this stage should also be set out how the compensatory improvements to the environmental quality and accessibility to remain Green Belt related to biodiversity net gain and the duplication of compensation.				appropriate balance between allowing flexibility for site specific circumstances whilst providing a clear process for developers to follow.  It is already clear from the policy that it applies to sites removed from the green belt through the local plan, and therefore it is not considered necessary to reference these sites in the policy itself.  Equally, it is not considered necessary to clarify in the policy that it does not apply to sites previously removed from the Green Belt through previous plans.
Marrons Planning for Boningale Homes	AGT24-027-02-01	Policy DS2	Boningale Homes do not support an approach where by compensatory land is required when sites, that have demonstrated Exceptional Circumstances or Very Special Circumstances, are removed from the Green Belt. The Council should be reminded that the allocation of land as Green Belt does not indicate any intrinsic landscape, biodiversity or ecological value and that indeed Green Belt is a policy designation only. Accordingly, where it is demonstrated that land is required to be released from the Green Belt to meet housing needs, it is inappropriate and unjustified to require compensatory measures.	Not stated	No	Not stated	The NPPF is clear that compensatory improvements are required where Green Belt release is proposed. It is therefore considered that this policy is necessary, and without it, could render Green Belt allocations non-compliant with the NPPF.
Pegasus Group for Clowes Developments	AGT24-031-02-01	Policy DS2	Clowes supports the inclusion of a policy setting out the need for Green Belt compensation in relation to sites being removed from the Green Belt. However, despite representations in the 2022 Publication Plan, the policy still leaves elements of ambiguity, and its practical application is unclear. The proposed rewording of the policy is in paragraphs 5.29 – 5.30 of the representation.	Not stated	No	No	The policy sets out a stepped approach to identifying compensatory improvements in the Green Belt, allowing flexibility to respond to site specific opportunities and the wider area context in providing Green Belt compensatory improvements. This is considered to strike an appropriate balance between allowing flexibility for site specific circumstances whilst providing a clear process for developers to follow.
Pegasus Group for Clowes Developments	AGT24-031-02-02	Policy DS2	The hierarchical approach to the Green Belt compensation policy as drafted is not supported. Neither the NPPF or PPG refer to a hierarchy or preferred methods of compensation. It appears that all the potential methods require some method of actually delivering the compensation. In practical terms this is likely to be via a S106 agreement associated with a planning permission to develop the allocation. Whilst it is accepted that having the Green Belt compensation close to the allocation could be advantageous, it is the overall value of that improvement which is of greatest significance. There is also potential for the lowest	Not stated	No	No	The policy sets out a stepped approach to identifying compensatory improvements in the Green Belt, allowing flexibility to respond to site specific opportunities and the wider area context in providing Green Belt compensatory improvements. This is considered to strike an appropriate balance between allowing flexibility for site specific circumstances whilst providing a clear process for developers to follow.



**CHAPTER 5 & POLICIES DS1-DS5: DEVELOPMENT STRATEGY AND SUPPORTING TEXT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>ranked element of the hierarchy to result in the same, or greater, benefit than compensation associated with the highest rank.</p> <p>The policy is considered unsound as it is neither justified nor consistent with national policy. The policy should be amended to delete the hierarchy and instead state that Green Belt compensation is required in conjunction with development of sites removed from the Green Belt.</p>				<p>It is considered that Green Belt compensatory measures should seek to benefit nearby residents who are most directly impacted by the loss of Green Belt and therefore the stepped approach is appropriate.</p> <p>No change proposed.</p>
Pegasus Group for St Philips	AGT24-032-07-02	Policy DS2	The hierarchical approach to the Green Belt compensation policy as drafted is not supported. Neither the NPPF or PPG refer to a hierarchy or preferred methods of compensation. The policy should be amended to delete the hierarchy and instead state that Green Belt compensation is required in conjunction with development of sites removed from the Green Belt as set out in the NPPF.	Yes	No	Not stated	<p>The policy sets out a stepped approach to identifying compensatory improvements in the Green Belt, allowing flexibility to respond to site specific opportunities and the wider area context in providing Green Belt compensatory improvements. This is considered to strike an appropriate balance between allowing flexibility for site specific circumstances whilst providing a clear process for developers to follow.</p> <p>It is considered that Green Belt compensatory measures should seek to benefit nearby residents who are most directly impacted by the loss of Green Belt and therefore the stepped approach is appropriate.</p> <p>No change proposed.</p>
PlanIT Planning & Development for Miller Homes	AGT24-034-04-05	Policy DS2	DS2 puts in place a series of potentially undeliverable requirements for Green Belt compensation. It is ambiguous and suggests that s106 agreements will be used to secure 'compensatory improvements' to the environmental quality. It is unclear what is meant by 'compensatory improvement' and this provides no certainty to developers. It is unclear how the local authority can be sure that the applicants have control over any adjoining land required to deliver the improvements. A simpler approach would be to use the 'key requirements' of the various allocation proformas to identify the specific Green Belt compensatory measures for each relevant allocation, any measures would need to be subject to agreement between the Council and the landowners.	Yes	No	Yes	<p>The policy provides flexibility to determining appropriate compensatory improvements on a site-by-site basis.</p> <p>The policy sets out a stepped approach to identifying compensatory improvements in the Green Belt, allowing flexibility to respond to site specific opportunities and the wider area context in providing Green Belt compensatory improvements. This is considered to strike an appropriate balance between allowing flexibility for site specific circumstances whilst providing a clear process for developers to follow.</p> <p>It is considered that Green Belt compensatory measures should seek to benefit nearby residents who are most directly impacted by the loss of Green Belt and therefore the stepped approach is appropriate.</p> <p>No change proposed.</p>

**CHAPTER 5 & POLICIES DS1-DS5: DEVELOPMENT STRATEGY AND SUPPORTING TEXT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
<b>POLICY DS3: OPEN COUNTRYSIDE</b>							
Savills UK Ltd for St Modwen & JM Holt	AGT24-038-04-06	Policy DS3	<p>Consider Policy DS3 should be amended to enable the delivery of additional large-scale employment sites in appropriate open locations, as and when required to address the needs of SSDC and the wider FEMA.</p> <p>It is requested that the following additional text be included in Policy DS3 as a penultimate paragraph in the policy:</p> <p>"Where evidence indicates an immediate need or demand for additional employment land (Class E(g)ii, E(g)iii, B2 and B8 or sui generis employment generating uses) that cannot be met from land allocated in this plan, the Council will favourably consider proposals that meet the identified need in appropriate locations outside of the district's settlements in the open countryside. Such development should be delivered in accordance with the requirements of other policies within the local plan."</p> <p>It is also requested that the fourth paragraph of Policy DS3 be amended as follows to provide the flexibility needed to address the employment needs of South Staffordshire:</p> <p>"All types of development in the Open Countryside which are not explicitly supported by Policy DS3 will be considered on a case-by-case basis. Such proposals will only be permitted on best and most versatile agricultural land where the benefits of the scheme outweigh the economic and other benefits of that agricultural land and are fully consistent with any other relevant policies set out elsewhere in the Local Plan. These include, but are not limited to, policies which relate to the district's:..."</p>	Yes	No	No	<p>The plan already makes provision to meet our own employment land needs as well as a contribution to unmet needs of the wider Functional Economic Market Area (FEMA). Policy DS3 does not prohibit employment land coming forward in the open countryside but sets out that proposals will be considered on a case-by-case basis having regard to the relevant policies in the plan. Given the above, it is not considered necessary to amend the policy to explicitly support unallocated employment development coming forward in the open countryside, as such development could still be acceptable, subject to being in accordance with relevant policies in the plan.</p> <p>No change proposed.</p>
Acres Land and Planning for Hallam Land Management	AGT24-001-01-01	Policy DS3	<p>We recognise that a firm 'Open Countryside' policy is needed for sites which are outside the urban areas. However, we consider that the Sandy Lane, Codsall site should be allocated and therefore should not be subject to this policy and should be included in the list of allocated sites within Policy SA3.</p>	Not stated	No	Not stated	Comments noted.
Emery Planning for Wain Estates	AGT24-016-02-05	Policy DS3	<p>Object to the proviso that such development cannot be located on best and most versatile (BMV) agricultural land.</p> <p>Paragraph 180(b) of the NPPF confirms it is also necessary to consider whether a proposal would have a significant effect on agriculture as a result of the loss of BMV land. This is reflected in the fact that Natural England are only consulted on non-agricultural applications (not in accordance with the adopted development plan) that result in the loss of more than 20 hectares (ha) of BMV land. We therefore consider that the reference to BMV land should be deleted from the policy.</p>	Not stated	No	No	<p>NPPF para 180 (b) confirms that policies should recognise 'the intrinsic character and beauty of the countryside...including the economic and other benefits of the best and most versatile agricultural land'. Policy DS3 aligns with this objective by seeking to protect BMV and direct development to the most suitable locations in the open countryside having regard to the factors bulleted in the policy.</p> <p>No change proposed.</p>

**CHAPTER 5 & POLICIES DS1-DS5: DEVELOPMENT STRATEGY AND SUPPORTING TEXT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
Clare-Hay, A	RES24-041-03	Policy DS3	<p>Site 036c This site fails all three elements of policy DS3 and may not be legally compliant with it. Will not deliver diverse and sustainable farming enterprises. Will not deliver other countryside-based enterprises and activities. Will not provide for the sensitive use of sustainable energy. Will not enable re-use of existing building. Land is on grade 2-3 farming land which has been productively farmed for generations A number of policy areas not met or addressed including design standards, landscape character and assets, heritage assets and impact on adjacent farm, biodiversity net gain, housing mix and sustainable travel. There is no unmet housing need in the area Local schools confirmed as full Site is an important part of the Cannock chase AONB SSDC maintains a brownfield register and if the 81 houses to be built are deemed necessary, then that would be a suitable alternative to this site.</p>	No	No	No	<p>It is proposed that Site 036c will be removed from the open countryside with a development boundary identified, having been assessed as suitable for allocation through of Housing Site Assessment Topic Paper 2024. Once removed from the open countryside, there will not be a requirement to conform to Policy DS3. The site will however have to conform to other policies covering the policy areas highlighted including, biodiversity net gain, housing mix and sustainable transport. South Staffordshire as a whole has a housing need that the plan will address through the proposed allocations. The plan will also make a contribution to unmet needs through allocations in the plan. The plan has sought to prioritise non-Green Belt sites, including brownfield sites through the site assessment process, in accordance with national policy.</p> <p>Engagement throughout plan preparation has taken place with the School Organisation Team (SOT) at Staffordshire County Council. They have not indicated that the impact of the proposed allocation is incapable of being mitigated through financial contributions in line with Policy HC15.</p> <p>No change proposed.</p>
Clewley, G & A	RES24-042-02	Policy DS3	<p>Site 036c - Goes against NPPF section 15 regarding the conservation or enhancement of the natural environment. Land is very productive for farming and is versatile - Plan is not assisting in delivering sustainable farming but rather is diminishing farming and will reduce food self-sufficiency</p>	No	No	Not stated	<p>NPPF para 180 (b) confirms that policies should recognise 'the intrinsic character and beauty of the countryside...including the economic and other benefits of the best and most versatile agricultural land'. Policy DS3 aligns with this objective by seeking to protect BMV and direct development to the most suitable locations in the open countryside having regard to the factors bulleted in the policy.</p> <p>No change proposed.</p>
Grainger, P	RES24-087-02	Policy DS3	<p>Site 036c Building on this land will change its character and debases surrounding area not yet allocated. The land is high quality agricultural land that provides produce</p>	Not stated	No	Not stated	<p>Policy DS3 requires proposals to be consistent with local plan policies relating to landscape character and assets.</p> <p>NPPF para 180 (b) confirms that policies should recognise 'the intrinsic character and beauty of the countryside...including the economic and other benefits of the best and most versatile</p>

**CHAPTER 5 & POLICIES DS1-DS5: DEVELOPMENT STRATEGY AND SUPPORTING TEXT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							<p>agricultural land'. Policy DS3 aligns with this objective by seeking to protect BMV and direct development to the most suitable locations in the open countryside having regard to the factors bulleted in the policy.</p> <p>No change proposed.</p>
Hodgson, B	RES24-110-01	Policy DS3	<p>Site 036c</p> <ul style="list-style-type: none"> <li>- The use of this site fails the NPPF- 'conserving and enhancing the natural environment' and following this is a legal obligation</li> <li>-The land is high grade productive farmland so should not be developed on</li> <li>-Countryside provides beautiful views</li> <li>-Site is noted for its wildlife diversity and it is important to maintain that</li> <li>-Proposed development meets none of the objectives of DS3</li> <li>-Housing has been put in the wrong areas and been excessively provided in the local plan</li> <li>- design standards Not addressed</li> <li>- landscape character and assets Not met</li> <li>- heritage assets Not addressed,</li> <li>- ecological assets and biodiversity Not met and cannot be realistically met by claimed offsets such as 'diversity in gardens or financial contributions to the Cannock Chase AONB</li> <li>- recreational assets Not met</li> <li>- housing mix requirements (where applicable) Not met</li> <li>- sustainable travel requirements Nil within SSDC and severely overloaded within adjacent SBC.</li> <li>- no unmet housing need in the area</li> <li>-Incorrect assessment by consultant surrounding education provision</li> <li>-Land is within the SAC of the Cannock Chase AONB</li> <li>- Illogical to place houses there, moving sites to further away from Stafford would be logical if the housing provision is even required</li> <li>-SSDC has a brownfield register that could be utilised</li> <li>-SSDC have not effectively exercised their 'duty to cooperate' with SBC</li> </ul>	No	No	No	<p>The council considers that all proposed allocations comply with the NPPF and the spatial strategy (identified in Policy DS5) insofar as they are located to deliver sustainable patterns of development that meet the authorities' identified housing need.</p> <p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district's agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p> <p>Landscape sensitivity has been assessed through the Landscape Sensitivity Study. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that better perform as sustainable allocations. Any future planning application would be expected to address Policy NB4 – which the council has included as a proposed policy in the plan – insofar as the design and location of new development should take account of the characteristics and sensitivity of the landscape and its surroundings, including not having a detrimental impact upon any medium or long-distance views.</p> <p>The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to – identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon</p>

**CHAPTER 5 & POLICIES DS1-DS5: DEVELOPMENT STRATEGY AND SUPPORTING TEXT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							<p>their impact on habitats sites.</p> <p>Allocation of the site will remove it from designation as Open Countryside and therefore Policy DS3 would not apply. Once removed from the open countryside, there will not be a requirement to conform to Policy DS3. The site will however have to conform to other policies covering the policy areas highlighted including, biodiversity net gain, housing mix and sustainable transport.</p> <p>The Council has applied the Standard Method formula as set out in the NPPF correctly when arriving at our Local Housing Need between 2023 and 2041 of 4086 dwellings, equating to 227 dwellings per annum. Any oversupply that may have been delivered by Stafford is not a relevant consideration when preparing the plan for South Staffordshire as it is a different HMA.</p> <p>The impact upon the historic environment has been assessed on a site-by-site basis through the preparation of a Historic Environment Site Assessment (HESA) which has informed the site selection process. Site 036c was identified in the HESA as 'amber' for predicted impact on the historic environment meaning that there are no significant effects that cannot be mitigated. Nevertheless, only the northern portion of the wider site parcel has been proposed for allocation as recommended in the HESA.</p> <p>Any future planning application on this proposed allocation would be expected to conform with all relevant draft policies and are matters to be dealt with at that stage, and not at present. This includes design considerations (Policy HC10), sustainable travel (Policy EC12), recreation (Policies HC17, and HC18),</p> <p>Any specific developer contributions that are required to mitigate any adverse impacts of development on Cannock Chase SAC will be secured at the point of a planning application approval. The council considers that the mechanism to secure such a financial contribution is through Policy NB3 is satisfactory.</p>

**CHAPTER 5 & POLICIES DS1-DS5: DEVELOPMENT STRATEGY AND SUPPORTING TEXT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							<p>The Council considers that the requirement for 70% of market housing to provide 3 bedrooms or less provides a suitable balance between meeting local housing need for smaller properties (as evidenced by the Housing Market Assessment), providing certainty to developers and landowners of the Council's expectations, and providing sufficient flexibility to reflect individual site circumstances.</p> <p>Engagement throughout plan preparation has taken place with the School Organisation Team (SOT) at Staffordshire County Council. SSDC are confident in the accuracy of information received.</p> <p>Any specific developer contributions that are required to mitigate any adverse impacts of development on Cannock Chase SAC will be secured at the point of a planning application approval through Policy NB3.</p> <p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>The Council's Brownfield Land Register is kept in line with the appropriate legislation; The Town and Country Planning (Brownfield Land Register) Regulations 2017. It is not designed to form part of the site selection process.</p> <p>Stafford Borough Council and SSDC have an agreed SoCG that addresses Duty to Cooperate matters that both parties consider to be sound and lawful as set out in the Duty to Cooperate Topic Paper 2024.</p> <p>No change proposed.</p>
Holyhead, P & S	RES24-112-01	Policy DS3	<p>Site 036c</p> <ul style="list-style-type: none"> <li>- The use of this site fails the NPPF- 'conserving and enhancing the natural environment' and following this is a legal obligation</li> <li>-The land is high grade productive farmland so should not be developed on</li> <li>-Countryside provides beautiful views</li> <li>-Site is noted for its wildlife diversity and it is important to maintain that</li> <li>-Proposed development meets none of the objectives of DS3</li> <li>-Housing has been put in the wrong areas and been excessively</li> </ul>	No	No	No	<p>Response as above.</p> <p>No change proposed.</p>



**CHAPTER 5 & POLICIES DS1-DS5: DEVELOPMENT STRATEGY AND SUPPORTING TEXT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>provided in the local plan</p> <ul style="list-style-type: none"> <li>- design standards Not addressed</li> <li>- landscape character and assets Not met</li> <li>- heritage assets Not addressed,</li> <li>- ecological assets and biodiversity Not met and cannot be realistically met by claimed offsets such as 'diversity in gardens or financial contributions to the Cannock Chase AONB</li> <li>- recreational assets Not met</li> <li>- housing mix requirements (where applicable) Not met</li> <li>- sustainable travel requirements Nil within SSDC and severely overloaded within adjacent SBC.</li> <li>- no unmet housing need in the area</li> <li>-Incorrect assessment by consultant surrounding education provision</li> <li>-Land is within the SAC of the Cannock Chase AONB</li> <li>- Illogical to place houses there, moving sites to further away from Stafford would be logical if the housing provision is even required</li> <li>-SSDC has a brownfield register that could be utilised</li> <li>-SSDC have not effectively exercised their 'duty to cooperate' with SBC</li> </ul>				
Hunt, K	RES24-116-01	Policy DS3	<p>Site 036c Site contradicts the policy aims of DS3 in terms of preserving the open countryside of the area and the 'classical rolling countryside' being protected. Development would cause massive negative impacts for local residents</p>	No	No	No	<p>Allocation of the site will remove it from designation as Open Countryside and therefore Policy DS3 would not apply. Once removed from the open countryside, there will not be a requirement to conform to Policy DS3 but rather the relevant Development Management policies that are applicable at the time of consideration and determination.</p> <p>Implications for local service provision and infrastructure have been assessed alongside the relevant responsible bodies. Engagement throughout plan preparation has taken place with Local Highways Authority, School Organisation Team (SOT) (both Staffordshire County Council), and Staffordshire and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical Commissioning Group). None of which have indicated that the impact of the proposed development would have significant or unmitigable impacts on their respective infrastructure responsibilities, or addressed through proposed Policies HC14, and HC15.</p>
Johnston, P	7219	Policy DS3	<p>Site 036c The land is grade 2/3 is productive farmland and is classical rolling countryside providing an excellent vista from the large wildwood development</p>	No	No	No	<p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district's agricultural land is classified as potential BMV,</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			Noted for its diversity of wildlife				<p>classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p> <p>Landscape sensitivity has been assessed through the Landscape Sensitivity Study. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that better perform as sustainable allocations. Any future planning application would be expected to address Policy NB4 – which the council has included as a proposed policy in the plan – insofar as the design and location of new development should take account of the characteristics and sensitivity of the landscape and its surroundings, including not having a detrimental impact upon any medium or long-distance views.</p> <p>The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to – identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact on habitats sites.</p> <p>No change proposed.</p>
Jones, C & J	RES24-124-01	Policy DS3	<p>Site 036c Contradicts policy DS3 as a development here would harm the 'intrinsic character' of the area, destroys an area of productive, good quality farmland, where the policy states poorer quality land should be used The site is within the zone of influence for Cannock Chase's AONB Development at this site would set a precedent for further development over the whole of Acton Hill.</p>	No	No	No	<p>Allocation of the site will remove it from designation as Open Countryside and therefore Policy DS3 would not apply. Once removed from the open countryside, there will not be a requirement to conform to Policy DS3 but rather the relevant DM policies that are applicable.</p> <p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district's agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed</p>

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							<p>sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p> <p>Development in locations to the northeast of the district towards Cannock Chase National Landscape have the potential to have a negative effect on the character and/or setting of the National Landscape. Any future planning application would be expected to address Policy NB4 insofar as they must conserve and enhance the landscape and scenic beauty of the area and conform with the most up to date SPDs.</p> <p>The proposed allocation of the low-lying, northern portion of the wider site is designed to overcome issues with the southern portion and its impact upon the historic environment. The council considers that these site-specific issues will prevent any future development to the south of the proposed allocation.</p> <p>Any future planning application will be expected to conform with all relevant Development Management policies that are applicable at the time of consideration and determination.</p> <p>No change proposed.</p>
Knight, J	RES24-131-01	Policy DS3	<p>Site 036c Site fails the NPPF as it does not conserve or enhance the natural environment Land is productive farm land as well as 'classical rolling countryside' Does not comply with policy DS3 Will not assist in delivering diverse and sustainable farming enterprises and will not provide for the sensitive use of renewable energy resources. Won't allow for reuse of existing building. Will be built on diverse agricultural land. Site is also not in alignment with a lot of other policies laid out by the council in the local plan There is no local unmet housing need Council maintains a brownfield register which could be used instead Would damage local biodiversity</p>	No	No	No	<p>The council considers that all proposed allocations comply with the NPPF and the spatial strategy (identified in Policy DS5) insofar as they are located to deliver sustainable patterns of development that meet the authorities' identified housing need.</p> <p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district's agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							<p>Allocation of the site will remove it from designation as Open Countryside and therefore Policy DS3 would not apply. Once removed from the open countryside, there will not be a requirement to conform to Policy DS3 but rather the relevant DM policies that are applicable.</p> <p>The council considers Policy BN5 sufficient in dealing with the development of renewable energy technologies. There is not a statutory need to identify suitable sites for allocation through the Local Plan.</p> <p>The council has sought to maximise the development opportunities on sites outside of the Green Belt in the first instance, this includes site 036c located within Open Countryside, before identifying Green Belt sites.</p> <p>Albeit as relatively smaller proposed allocation, site 036c will still contribute to the meeting the housing needs of South Staffordshire alongside the other residential allocations in the plan.</p> <p>The Council's Brownfield Land Register is kept in line with the appropriate legislation; The Town and Country Planning (Brownfield Land Register) Regulations 2017. It is not designed to form part of the site selection process.</p> <p>The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to - identify - amongst other things - allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact on habitats sites.</p> <p>No change proposed.</p>
Knight, L	RES24-133-01	Policy DS3	<p>Site 036c Site fails the NPPF as it does not conserve or enhance the natural environment Land is productive farm land as well as 'classical rolling countryside' Does not comply with policy DS3 Will not assist in delivering diverse and sustainable farming enterprises and will not provide for the sensitive use of renewable energy resources Won't allow for reuse of existing building.</p>	No	No	No	<p>Response as above.</p> <p>No change proposed.</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>Will be built on diverse agricultural land. Site is also not in alignment with a lot of other policies laid out by the council in the local plan There is no local unmet housing need Council maintains a brownfield register which could be used instead Would damage local biodiversity</p>				
Monnox, D	RES24-151-01	Policy DS3	<p>Site 036c Failed the duty to cooperate with SBC and fails the NPPF The land is farmland that has been graded 2/3 and produces very well Land is rolling countryside and has an abundance of wildlife Does not meet any of the DS3 objectives and there is no unmet housing need that justifies this application The land has a poor education provision It is in the SAC of the cannock chase AONB SSDC have not taken into account the housing allocation that SBC have declared in their extant plan for Stafford borough</p>	No	No	No	<p>Stafford Borough Council and SSDC have an agreed SoCG that addresses Duty to Cooperate matters that both parties consider to be sound and lawful as set out in the Duty to Cooperate Topic Paper 2024.</p> <p>The council considers that all proposed allocations comply with the NPPF and the spatial strategy (identified in Policy DS5) insofar as they are located to deliver sustainable patterns of development that meet the authorities' identified housing need.</p> <p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district's agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p> <p>The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to – identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact on habitats sites.</p> <p>Allocation of the site will remove it from designation as Open Countryside and therefore Policy DS3 would not apply. Once removed from the open countryside, there will not be a requirement to conform to Policy DS3 but rather the relevant DM policies that are applicable.</p> <p>An unmet housing need has been identified and</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							<p>evidenced in the Greater Birmingham and Black Country Housing Market Area, a contribution to which is being provided in this plan.</p> <p>Engagement throughout plan preparation has taken place with the School Organisation Team (SOT) at Staffordshire County Council. They have not indicated that the impact of the proposed allocation is incapable of being mitigated through financial contributions in line with Policy HC15.</p> <p>Any mitigation measures to overcome adverse impacts of development on Cannock Chase SAC will be secured at the point of a planning application approval. The council considers that the mechanism to secure such a financial contribution is through Policy NB3 is satisfactory.</p> <p>Any oversupply that may have been delivered by Stafford is not a relevant consideration when preparing the plan for South Staffordshire as it is a different HMA.</p> <p>No change proposed.</p>
Monnox, P	RES24-152-01	Policy DS3	<p>Site 036c Failed the duty to cooperate with SBC and fails the NPPF The land is farmland that has been graded 2/3 and produces very well Land is rolling countryside and has an abundance of wildlife Does not meet any of the DS3 objectives and there is no unmet housing need that justifies this application The land has a poor education provision It is in the SAC of the cannock chase AONB SSDC have not taken into account the housing allocation that SBC have declared in their extant plan for Stafford borough</p>	No	No	No	<p>Response as above.</p> <p>No change proposed.</p>
Cain, S	RES24-033-04	Policy DS3	The Open Countryside should be protected and only used for housing as a last resort after all Brown Field sites are exhausted.	Not stated	Not stated	Not stated	The Council has sought to maximise suitable brownfield sites where these are available and suitable as set out in our Housing Site Assessment Topic Paper 2024.
Simms, M	RES24-214-01	Policy DS3	<p>Site 036c The land is productive farmland that is graded 2/3 by SSDC's own metrics It is classical rolling countryside that is noted for its diversity of wildlife Does not comply with policy DS3 Meets none of the objectives of the policy</p>	No	No	No	Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district's agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of



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			<p>No unmet housing need in the area Fails the duty to cooperate with Stafford borough council Site is within the SAC of the Cannock Chase AONB, and biodiversity destroyed could not be mitigated with the other schemes suggested SSDC maintain a brownfield register, which should be prioritised as a site for development</p>				<p>PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p> <p>The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to – identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact on habitats sites.</p> <p>Allocation of the site will remove it from designation as Open Countryside and therefore Policy DS3 would not apply. Once removed from the open countryside, there will not be a requirement to conform to Policy DS3 but rather the relevant DM policies that are applicable.</p> <p>Any future planning application would be expected to address Policy NB4 insofar as they must conserve and enhance the landscape and scenic beauty of the area and conform with the most up to date SPDs.</p> <p>The Brownfield Land Register is not designed to form part of the site selection process, although sites included within it which do not have planning permission are included within the Council's Strategic Housing and Economic Land Availability Assessment (SHELAA) which does form part of the site selection evidence base to the plan.</p> <p>No change proposed.</p>
Taylor, G	RES24-232-02	Policy DS3	<p>It does not appear to have been the subject of effective 'duty to co-operate' liaison with Stafford Borough Council (SBC) and it appears to be in contrary to National Planning policy by virtue of this lack of effective cooperation plus inadequate emphasis being given to obligations to maintain natural and local environment and to protect and enhance landscapes. Site 036c should be deleted, in its entirety, from the Plan.</p>	No	No	No	<p>Stafford Borough Council and SSDC have an agreed SoCG that addresses Duty to Cooperate matters effectively that both parties consider to be sound and lawful as set out in the Duty to Cooperate Topic Paper 2024.</p> <p>No change proposed.</p>
Williams, E	RES24-254-01	Policy DS3	<p>Site 036c Acton Trussell has a rich legacy as a historic village in the area, and the proposal poses a considerable threat to its true character</p>	No	No	No	<p>The justification for proposing site 036c as a residential allocation is based on it being a non-Green Belt opportunity with access to services and infrastructure in nearby settlements. The</p>

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			<p>A new development would have poor access to services and facilities Fails the duty to cooperate with SBC Additional traffic created on Acton Hill would be a danger Good agricultural land that is very productive Fails all the criteria of DS3 Only site earmarked in the plan for a tier 2,3 or 4 settlement Threat to sensitive landscape</p>				<p>allocation of the site is not considered to impact upon the setting or character of Acton Trussell as set out in the Housing Site Selection Topic Paper 2022 as it is located adjacent to Stafford town and is not an isolated rural settlement.</p> <p>Stafford Borough Council and SSDC have an agreed SoCG that addresses Duty to Cooperate matters effectively that both parties consider to be sound and lawful as set out in the Duty to Cooperate Topic Paper 2024.</p> <p>Engagement throughout plan preparation has taken place with Local Highways Authority (Staffordshire County Council). They have not indicated that the impact of the proposed allocation would not generate any significant impacts on the transport network or highway safety that cannot be mitigated in line with paragraph 114 d of the NPPF.</p> <p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district's agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p> <p>Allocation of the site will remove it from designation as Open Countryside and therefore Policy DS3 would not apply. Once removed from the open countryside, there will not be a requirement to conform to Policy DS3 but rather the relevant DM policies that are applicable.</p> <p>Landscape sensitivity has been assessed through the Landscape Sensitivity Study. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that better perform as sustainable allocations. Any future planning application would be expected to address Policy NB4 insofar as the design and</p>

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							location of new development should take account of the characteristics and sensitivity of the landscape and its surroundings, including not having a detrimental impact upon any medium or long-distance views.  No change proposed.
Hughes, K	RES24-114-02	Policy DS3	Support this plan to protect green belt. It is important to protect the countryside and also to support development proposals which promote farming diversity and encourage recreation and enjoyment of the countryside. With respect to solar farms, each application should be carefully considered not only as a standalone application but the total number of applications and their effect should also be considered. Although not considered permanent, 40 years is still a long time.	Not stated	Not stated	Not stated	Comments noted.
Hinde, D	RES24-107-01	Policy DS3	Site 036C, in relation to Policy DS3 - Open Countryside. Under Policy DS3, 036c does not fall into these criteria, and therefore not supported under this policy. The site is best and most versatile land, which is contrary to DS3. Therefore, it is not legally compliant or sound. Paragraph 5.28 of the plan states why this piece of land should not be developed. It refers to a small section of non-Green Belt housing land for development. It fails to mention the BMV agricultural land, so the basis for building on this is unsound, and does not pass the test of soundness. The plan is not positively prepared, and only considers the developer's approach and not local opinion. The development of this land is not justified or effective because it is isolated from the District's other communities.	No	No	No	Allocation of the site will remove it from designation as Open Countryside and therefore Policy DS3 would not apply. Once removed from the open countryside, there will not be a requirement to conform to Policy DS3 but rather the relevant DM policies that are applicable.  Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district's agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.  The site allocation is located adjacent to Stafford town and is not an isolated rural settlement as it is located adjacent to Stafford town where community facilities and other services and infrastructure are available.  The council has undertaken a number of consultation exercises as local plan preparation has progressed as per legislation. Residents and all other stakeholders have been given the opportunity to provide their input into the plan making process, and these views have been

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							reflected as far as possible in each iteration of the plan as it has developed.  No change proposed.
Windsor, R	RES24-255-01	Policy DS3	<p>Site ref: 036c. Representation in relation to DS3 Open Countryside.</p> <p>Not legal:  <ul style="list-style-type: none"> <li>- Fails to accord with NPPF Section 15 - Conserving and enhancing the natural environment.</li> <li>- Land is productive farmland, as Grade 3 (Grade 2 near Acton Trussell).</li> <li>- Countryside location which provides an excellent vista from the Wildwood development and the A34 SE of Stafford.</li> <li>- Biodiversity between Cannock Chase.</li> </ul> </p> <p>Site ref: 036c. Representation in relation to DS3 Open Countryside.</p> <p>Not legal:  <ul style="list-style-type: none"> <li>- Fails to accord with NPPF Section 15 - Conserving and enhancing the natural environment.</li> <li>- Land is productive farmland, as Grade 3 (Grade 2 near Acton Trussell).</li> <li>- Countryside location which provides an excellent vista from the Wildwood development and the A34 SE of Stafford.</li> <li>- Biodiversity between Cannock Chase.</li> </ul> </p> <p>Not sound:  <ul style="list-style-type: none"> <li>- Site 036c does not gain support from Policy DS3, as it is on agricultural land.</li> <li>- Reason for this site is that it is not in Green Belt is not justified, as there is no unmet housing need in neighbouring Stafford Borough Council.</li> <li>- Should not be able to extend a neighbouring authority without their agreement.</li> <li>- Plan does not comply with NPPF Section 3 - Plan making.</li> <li>- Plan not positively prepared with other authorities, and no cross-boundary strategic planning.</li> <li>- Alternative locations for housing have not been justified.</li> <li>- Not deliverable in the plan period.</li> </ul> </p> <p>Duty to co-operate:  <ul style="list-style-type: none"> <li>- Not evidenced how they have carried out the duty to co-operate with Stafford Borough Council.</li> </ul> </p> <p>Site 036c is unnecessary and surplus to requirements.</p> <p>Not sound:  <ul style="list-style-type: none"> <li>- Site 036c does not gain support from Policy DS3, as it is on agricultural land.</li> <li>- Reason for this site is that it is not in Green Belt is not</li> </ul> </p>	Not stated	No	No	<p>The council considers that all proposed allocations comply with the NPPF and the spatial strategy (identified in Policy DS5) insofar as they are located to deliver sustainable patterns of development that are distributed across the district on strategic planning matters and meet the authorities' identified housing need.</p> <p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district's agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p> <p>Landscape sensitivity has been assessed through the Landscape Sensitivity Study. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that better perform as sustainable allocations. Any future planning application would be expected to address Policy NB4 – which the council has included as a proposed policy in the plan – insofar as the design and location of new development should take account of the characteristics and sensitivity of the landscape and its surroundings, including not having a detrimental impact upon any medium or long-distance -/views.</p> <p>The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact on habitats sites.</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>justified, as there is no unmet housing need in neighbouring Stafford Borough Council.</p> <ul style="list-style-type: none"> <li>- Should not be able to extend a neighbouring authority without their agreement.</li> <li>- Plan does not comply with NPPF Section 3 - Plan making.</li> <li>- Plan not positively prepared with other authorities, and no cross-boundary strategic planning.</li> <li>- Alternative locations for housing have not been justified.</li> <li>- Not deliverable in the plan period.</li> </ul> <p>Duty to co-operate:</p> <ul style="list-style-type: none"> <li>- Not evidenced how they have carried out the duty to co-operate with Stafford Borough Council.</li> </ul> <p>Site 036c is unnecessary and surplus to requirements.</p>				<p>The council has sought to maximise the development opportunities on sites outside of the Green Belt in the first instance, this includes site 036c located within Open Countryside, before identifying Green Belt sites. This approach is in conformity with paragraphs 146 and 147 of the NPPF.</p> <p>Any oversupply that may have been delivered by Stafford is not a relevant consideration when preparing the plan for South Staffordshire as it is a different HMA. The justification for proposing site 036c is set out in the Housing Site Assessment Topic Paper 2024. The site is a sustainable non-Green Belt opportunity that national policy requires consideration prior to considering green belt release. Taking all the different considerations together, site 036c has been identified as suitable to contribute to meeting South Staffordshire’s housing requirement.</p> <p>Stafford Borough Council (SBC) and SSDC have an agreed SoCG that addresses Duty to Cooperate matters effectively that both parties consider to be sound and lawful as set out in the Duty to Cooperate Topic Paper 2024.</p> <p>The viability or deliverability of the site has not been identified as problematic through the Viability Study 2022, nor by the site promotor; and the council has an agreed Statement of Common Ground with the developer to deliver a policy compliant scheme on the site.</p> <p>No change proposed.</p>
Wyatt, B	RES24-261-02	Policy DS3	<ul style="list-style-type: none"> <li>- The plan has not been the subject of effective DtC with Stafford BC.</li> <li>- The plan is contrary to the NPPF.</li> <li>- Inadequate emphasis on obligations to maintain natural and local environment, and to protect and enhance landscapes.</li> <li>- Landscape study scores site 036c as 'high' sensitivity. Reducing the capacity of the site does not negate this.</li> <li>- Site 036c has intrinsic character and value as an agricultural area.</li> <li>- Development of site 036c would be visually intrusive to attractive local views.</li> <li>- With the exception of the A34, site 036c is contiguous with Cannock Chase AONB.</li> </ul>	No	No	No	<p>Stafford Borough Council (SBC) and SSDC have an agreed SoCG that addresses Duty to Cooperate matters effectively that both parties consider to be sound and lawful as set out in the Duty to Cooperate Topic Paper 2024.</p> <p>The council considers that all proposed allocations comply with the NPPF and the spatial strategy (identified in Policy DS5) insofar as they are located to deliver sustainable patterns of development that are distributed across the district on strategic planning matters and meet the authorities’ identified housing need.</p>



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			<ul style="list-style-type: none"> <li>- There would be no clear or defensible boundary to the south of the development.</li> <li>- Site 036c would meet purposes a, b,c, and possibly d of the including land within the Green Belt.</li> <li>- The justification that developing site 036c because it is not Green Belt is insecure.</li> <li>- Site 036c is grade 3a productive farmland.</li> <li>- There is brownfield land within the district.</li> <li>- Site 036c includes mature hedgerow wildlife corridors and mature trees forming an important habitat.</li> <li>- Site 036c forms a contiguous part of the Radford Meadows Wildlife Trust Reserve.</li> <li>- Proposed development at site 036c meets none of the objectives of Policy DS3.</li> <li>- Design standards not addressed.</li> <li>- Landscape character and assets not addressed.</li> <li>- Heritage assets not addressed.</li> <li>- Ecological assets and biodiversity not addressed.</li> <li>- Recreational assets not addressed.</li> <li>- Housing mix requirements not addressed.</li> <li>- No sustainable travel requirements in South Staffordshire and minimal in Stafford Borough.</li> <li>- 81 houses are not necessary to meet SSDC housing demand, and there is no local unmet need.</li> <li>- Site 036c is within the zone of influence of SAC and Cannock Chase AONB. No evidence that this has been accounted for.</li> <li>- Site 036c forms and important part of the continuity of Open Countryside between Cannock Chase AONB and River Penk valley. It is unable to mitigate the impact of wildlife movements between these.</li> <li>- DEFRA Magic Map shows site 036c as within the SSSI impact zones for Baswich Meadows SSSI amd Milfield Quarry SSSI. No consideration of this impact.</li> <li>- DEFRA Magic Map shows the site is within the Nitrate Vulnerability Zone and adjoining priority woodland.</li> <li>- Financial mitigation to mitigate the damage to the AONBs environment are derisory.</li> <li>- Site 036c is closest of the proposed allocations to AONB.</li> </ul> <p>Site 036c should be deleted from the plan.</p>				<p>Landscape sensitivity has been assessed through the Landscape Sensitivity Study. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that better perform as sustainable allocations. Any future planning application would be expected to address Policy NB4 – which the council has included as a proposed policy in the plan – insofar as the design and location of new development should take account of the characteristics and sensitivity of the landscape and its surroundings, including not having a detrimental impact upon any medium or long-distance views.</p> <p>SAC constraints have been one of the assessment factors when determining the most sustainable allocations. Any specific developer contributions that are required to mitigate any adverse impacts of development on Cannock Chase SAC and AONB will be secured at the point of a planning application approval. The council considers that the mechanism to secure such a financial contribution through policies NB3, and NB4 are satisfactory.</p> <p>The proposed allocation of the low-lying, northern portion of the wider site is designed to overcome issues with the southern portion and its impact upon the historic environment. The council considers that these site-specific issues will prevent any future development to the south of the proposed allocation.</p> <p>The council does not consider that the exceptional circumstances exist to add any land into the Green Belt as per paragraph 144 of the NPPF.</p> <p>The council has sought to maximise the development opportunities on sites outside of the Green Belt in the first instance, this includes site 036c located within Open Countryside, before identifying Green Belt sites. This approach is in conformity with paragraphs 146 and 147 of the NPPF.</p>



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							<p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district’s agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p> <p>As set out in the Housing Site Selection Topic Paper 2022, there is very limited available brownfield land located within the district, and not enough to meet the district’s housing requirement in full. Where brownfield site opportunities are available, these have been included within the Local Plan.</p> <p>The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to identify – amongst other things – allocations which may have a ‘likely significant effect’ on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact on habitats sites.</p> <p>Allocation of the site will remove it from designation as Open Countryside and therefore Policy DS3 would not apply. Once removed from the open countryside, there will not be a requirement to conform to Policy DS3 but rather the relevant DM policies that are applicable.</p> <p>All site-specific design considerations will be assessed in detail at the point of determining any future planning application. At this time, the council considers Policy HC10 (Design Requirements) sufficient to ensure all development meets appropriate requirements and delivers high quality design features which suit their respective contexts.</p> <p>The impact upon the historic environment has been assessed on a site-by-site basis through the preparation of a Historic Environment Site Assessment (HESA) which has informed the site</p>

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							<p>selection process.</p> <p>A range of evidence pertaining to open space, sport, and recreation has been produced to inform the preparation of the local plan both in regard to draft policies (specifically HC17 Open Space, and HC18 Sports Facilities and Playing Pitches) and proposed site allocations. In short, recreation facilities/infrastructure has a minimal evidenced shortfall which nevertheless can be rectified through improved quality and access to existing provision. As such, the council considers policies HC17 and HC18 satisfactory in securing an appropriate level of future multi-functional, publicly accessible, open space, and protecting existing sports facilities and playing pitches.</p> <p>Housing mix will be secured at outline stage either via condition or S106 agreement.</p> <p>The council has included a sustainable transport policy (Policy EC12) that is considered to sufficient to address sustainable transport matters on a scheme-by-scheme basis. It will ensure that all development (including proposed allocations) maximises opportunities for walking, cycling, and public transport usage, and deliver expanded provision to meet increased cumulative demand for bus and rail services and connections.</p> <p>The Council has applied the Standard Method formula as set out in the NPPF correctly when arriving at our Local Housing Need between 2023 and 2041 of 4086 dwellings, equating to 227 dwellings per annum.</p> <p>The entirety of the district is included within the Nitrate Vulnerability Zone; therefore, it is unavoidable that all allocations will be located within and can't be considered a determinative factor in site selection.</p> <p>The methodology for the Sustainability Appraisal's (SA) assessment against SA Objective 3 - Biodiversity and Geodiversity has considered sites proximity to SSSIs (amongst other nationally and locally designated sites) in its scoring, including if a site falls within a SSSI</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							<p>Impact Risk Zone (IRZ). Where major positive and major negative effects are predicted in the 2024 SA then these have been recorded in the site assessment proformas in the Housing Site Assessment Topic Paper to be considered alongside other material planning considerations when arriving at a balanced judgement on which sites to propose for allocation.</p> <p>Any specific developer contributions that are required to mitigate any adverse impacts of development on Cannock Chase SAC will be secured at the point of a planning application approval. The council considers that the mechanism to secure such a financial contribution is through Policy NB3 is satisfactory.</p> <p>No change proposed.</p>
<b>POLICY DS4: DEVELOPMENT NEEDS</b>							
PlanIT Planning & Development for Amadis Holdings Ltd	AGT24-032-01-05	Policy DS4	The housing requirement suggested by policy DS4 is inadequate. We have provided a detailed explanation of our views on these matters in our response to Table 7 – Housing Target. The housing requirement in the Plan should be based upon the minimum Standard Method housing figure, upwardly adjusted to take account of affordability factors and economic growth objectives. Based on our calculations, the Plan seeks to accommodate just 1% of the unmet housing need arising from the conurbation. This is completely inappropriate, given the functional relationship between South Staffordshire and the conurbation with limited opportunities for the housing needs of the conurbation to be met elsewhere.	Yes	No	Yes	<p>Justification for the council’s spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district’s growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan’s ability to deliver housing growth. The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council’s Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>Therefore, a contribution to unmet needs of authorities in the Housing Market Area is being provided in addition to meeting our own housing needs, in accordance with what the council considers to be an appropriate strategy. Ongoing cooperation with Duty to Cooperate bodies has taken place and informed the plans strategic approach, as detailed in our Duty to Cooperate Topic Paper. Emerging Statements of Common Ground are being prepared with all neighbouring and HMA authorities to reflect our respective positions.</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							<p>The Council has used the standard method formula to determine our housing need and does not consider that exceptional circumstances exist to deviate from its use. The Council considers that the use of the standard method as the basis of our housing requirement is justified and an appropriate strategy.</p> <p>No changes proposed.</p>
Claremont Planning Consultancy for Noakes, J	AGT24-012-01-05	Policy DS4	<p>The housing requirement and strategy for meeting these housing needs is flawed and does not represent an appropriate or sustainable strategy when taking into consideration the Plan-making requirements of the NPPF. Cross boundary contribution is now a token gesture. Whilst changes to NPPF were made to Green Belt (para 145), notably it did not change the tests of soundness and the requirement for plans to be positively prepared and the Council has failed to plan positively to assist in meeting cross boundary needs.</p> <p>The Council's approach of focusing limited Green Belt development in Tier 1 locations well served by public transport is appropriate in principle, however this does not recognise opportunities on the edge of urban areas such as Wolverhampton that are also well served by public transport with good access to services. Essington Road site was dismissed previously as it was not consistent with the strategy of cross boundary growth on SUEs. As this is no longer the strategy this site should be reconsidered.</p> <p>it is important that this housing need figure is sufficient to appropriately accommodate the unmet needs. This must be remedied before the Plan is submitted for examination, in order to ensure that it can be demonstrated that the Plan complies with the Duty to Co-Operate and the tests of soundness.</p>	Yes	No	No	<p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>Therefore, a contribution to unmet needs of authorities in the Housing Market Area is being provided in addition to meeting our own housing needs, in accordance with what the council considers to be an appropriate strategy. Ongoing cooperation with Duty to Cooperate bodies has taken place and informed the plans strategic approach, as detailed in our Duty to Cooperate Topic Paper. Emerging Statements of Common Ground are being prepared with all neighbouring and HMA authorities to reflect our respective positions.</p> <p>Alternative spatial strategy and site options have been considered through our Sustainability Appraisal and Spatial Strategy and Housing Site Assessment Topic Papers - including options adjoining Wolverhampton - when arriving at the preferred spatial distribution of housing and preferred sites to meet the spatial strategy.</p> <p>No changes proposed.</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
Lichfield District Council	STA24-027-01	Policy DS4	<p>Lichfield District Council (LDC) is supportive of SSDC in meeting its own objectively assessed local housing need through the allocation of a minimum of 4,086 homes as detailed within Policy DS4: Development Needs. LDC welcomes the contribution of 640 dwellings towards unmet need within the wider HMA, however the reduced level of contribution will need to be robustly evidenced and justified in the context of the emerging unmet housing needs within the GBBCHMA.</p> <p>LDC supports the approach taken by SSDC in addressing local and wider need in the Black Country for employment land as expressed in policy DS4.</p> <p>LDC acknowledges the position that SSDC is having to take regarding gypsy and traveller provision and supports the proposals in policy DS4.</p>	Yes	Yes	Yes	<p>Comments noted.</p> <p>The rationale for the council's capacity led approach and revised housing target (4726 dwellings) and resultant reduced HMA contribution is set out in the Council's Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024.</p>
Dudley Metropolitan Borough Council	STA24-015-01	Policy DS4 (a)	<p>DS4 (a) Support the level of housing provision within the policy and the overall approach taken in relation to addressing unmet housing needs.</p> <p>There are elements of the policy which are 'unsound'. The policy identifies a supply that includes 10% additional homes for plan flexibility and it is expected that the delivery of any additional homes over the plan period should go towards the unmet housing needs of the GBBCHMA. The policy should explicitly express the contribution to unmet housing needs as a 'minimum'.</p> <p>The draft Statement of Common Ground is to be updated and Dudley MBC will continue to engage with South Staffordshire DC under the Duty to Cooperate. It is anticipated the Black Country and other GBBCHMA authorities will seek to apportion the contribution to unmet housing needs to specific local authorities via Statements of Common Ground. Reference should be made to this process within the justification text to the policy to ensure the plan is sound.</p> <p>Bullet point a) should be amended to read as follows (additional text in capitals): 4,726 homes over the period 2023-2041 to meet the district's housing target. . . plus a MINIMUM 640-home contribution towards unmet housing needs of the Greater Birmingham and Black Country Housing Market Area. The council will seek to demonstrate a 5 year housing land supply upon adoption of the plan.</p> <p>At paragraph 5.61 additional text should be included within the</p>	Yes	No	Yes	<p>The 10% plan flexibility (i.e. allocations totalling 10% above the plan target of 4726 dwellings) is there to account for any non-delivery of sites over the plan period, and therefore it would be inappropriate for these additional dwellings to be included in the housing requirement, and thereby available to contribute to cross boundary unmet needs.</p> <p>Equally, it would not be appropriate for the 640-home contribution to be expressed as a minimum as this forms part of the fixed 4726 housing requirement. Any over delivery on allocations above the housing requirement, or windfall sites coming forward outside the plan are by their nature uncertain, and it would not be practical for our contributions to unmet needs to remain fluid once the plan is adopted.</p> <p>The Council is content for authorities generating unmet needs to apportion our contribution via an agreed method and for this to be reflected in emerging Statements of Common Ground, subject to this being agreed by all parties in the housing market area who are generating an unmet need. We do not consider it necessary to refer to this process in the supporting text to the policy, nor do we consider it necessary for our plan to be sound, as the conclusions from this process are needed for neighbouring authorities progressing their own plans.</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>policy justification to reflect that the apportionment of the contribution to unmet housing needs between specific local authorities will be undertaken under the Duty to Cooperate via Statements of Common Ground.</p> <p>These modifications will ensure the Local Plan is sound in terms of being 'positively prepared' and addressing the unmet need from neighbouring areas.</p>				
Dudley Metropolitan Borough Council	STA24-015-01	Policy DS4 (b)	<p>DS4 (b) Consider the policy to be sound and supports the level of employment land provision within the policy. Support the approach taken to unmet employment land needs and welcome the contribution to the unmet employment land needs of the Black Country.</p> <p>Particularly support the text which identifies the contribution from the WMI to be a minimum and the acknowledgement that this contribution may increase as other authorities confirm whether they require their proportion of strategic employment land from the WMI.</p> <p>An employment land shortfall of 153ha is identified within the Black Country. Offers of employment land from local authorities with functional economic links including South Staffordshire (112.2ha) which are being progressed through local plan reviews will serve to reduce this evidenced shortfall to around 11ha. Draft Statements of Common Ground are to be updated and Dudley MBC will continue to engage with South Staffordshire DC under the Duty to Cooperate. Note that current drafts identify Stafford Borough Council do not require their WMI employment land share of 8ha and would expect these 8ha to be added to meeting the unmet employment needs of the Black Country.</p>	Yes	Yes	Yes	<p>Comments noted.</p> <p>Expect that any agreement to claim other authorities' proportion of WMI (e.g. Stafford Brough) will need to be agreed between the respective parties through a Statement of Common Ground.</p>
Dudley Metropolitan Borough Council	STA24-015-02	Policy DS4 (c)	<p>DS4 (c) Considers the policy to be sound and supports the level of gypsy and traveller pitches provision within the policy, and the approach taken to identifying future site supply.</p> <p>Draft Statements of Common Ground are to be updated and Dudley MBC will continue to engage with South Staffordshire DC. Discussions to date confirm Dudley MBC is unable to contribute towards the unmet needs of South Staffordshire for gypsy and traveller sites.</p>	Yes	Yes	Yes	<p>Comments noted. Statement of Common Ground confirms that South Staffordshire would expect Dudley MBC to explore the same pitch option as South Staffordshire including publicly owned land Green Belt site options.</p>
City Wolverhampton Council	STA24-012-01	Policy DS4	<p>Wolverhampton has a very strong functional relationship with South Staffordshire, expressed through migration patterns and travel to work data. Therefore, the SSLP contribution towards meeting wider unmet housing need continues to be welcomed in principle. However, in order to provide certainty for the</p>	Yes	No	Yes	<p>The Council is content for authorities generating unmet needs to apportion our contribution via an agreed method and for this to be reflected in emerging Statements of Common Ground, subject to this being agreed by all parties in the</p>



Submission Local Plan Review  
Schedule of Publication Plan 2024 Representations and Responses

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			<p>progression of the WLP and to inform our ongoing Duty to Cooperate engagement with other neighbouring Local Plans, it is critical that a Wolverhampton element of the 640 homes contribution is confirmed as soon as possible. We need to express this issue as a soundness matter at Regulation 19 stage but are confident that it is capable of being rectified by the time of submission of the Plan, through appropriate text in the Plan itself and/or a Statement of Common Ground – ideally both. In terms of the approach to calculate this apportionment, we recommend that migration patterns between South Staffordshire and those neighbouring authorities which can demonstrate unmet housing need would provide the starting point, with further refinement based on the scale and location of development proposed in the Plan and the proximity of these sites to Wolverhampton (details in full representation). We note the reference in the Local Plan to the existing (2018) Growth Study being out of date, and welcome the commitment to updating this evidence and considering the implications of any update through future plan-making. This City Council is also committed to progressing this work.</p>				<p>housing market area who are generating an unmet need. We do not consider it necessary to refer to this process in the supporting text to the policy, nor do we consider it necessary for our plan to be sound, as the conclusions from this process are needed for neighbouring authorities progressing their own plans.</p> <p>Commitment to updating the 2018 Growth Study is noted.</p>
Sandwell Council	STA24-038-01	Policy DS4	<p>LATE SUBMISSION Note the SSLP housing target of local housing need plus 640 homes to address the Greater Birmingham and Black Country Housing Market Area housing shortfall up to 2041</p>	Yes	No	Yes	Comments noted.
Goldfinch Town Planning Services	AGT24-020-01-01	Policy DS4	<p>Failure to deliver promised new jobs growth: the economic regeneration benefits of the i54 have been hugely over-inflated and exaggerated. The thousands of new jobs being promised by this business park have simply never materialised.</p>	No	No	No	<p>Comments noted. I54 has been a very successful development bringing international occupiers to the district such as JLR and is continuing to expand to provide further jobs.</p> <p>No change proposed.</p>
Staffordshire County Council	STA24-044-02	Policy DS4	<p>The Plan has not been positively prepared in taking into account the unmet housing need from the Greater Birmingham and Black Country Housing Market area in the longer term. The Plan sets out in paragraph 5.12 that recent evidence suggested the shortfall across the HMA will be in the order of 106,654 dwellings. Previous iterations of the SSDC Local Plan have tested a contribution of 4,000 units towards the shortfall based on a 2018 study for the HMA. The Plan further goes on to state that the 2018 study is now out of date and new evidence is to be prepared, with SSDC being committed to participating and considering finding through future Plan making. It is in this context we find the Plan unsound by lacking vision and forward thinking to provide insight into future long term growth options. Earlier iterations of the Local Plan included policy provision for a New Settlement and set out an area of search aligned with the A449 between Featherstone and Dunston. To that end the County Council also made SSDC aware through call for sites and</p>	Yes	No	Yes	<p>Justification for the council’s spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district’s growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan’s ability to deliver housing growth. The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council’s Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>A contribution to unmet needs of authorities in</p>

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			<p>direct engagement that the County own substantial tracts of land as part of the County Farm estate that could be made available for housing growth.</p> <p>Since 2021 the County Council has commissioned extensive technical work and Masterplanning, including transport, viability and environmental studies that underpin the David Lock Associates and AECOM Growth Scenario Report, which was submitted through the Plan making process. This body of work explores what a western urban extension could look like and deliver and can be viewed at <a href="http://www.penkridge2050.co.uk">www.penkridge2050.co.uk</a></p> <p>Re-insert the section and policy for Longer Term Growth Aspirations for a New Settlement that was included within the 2022 Publication Plan, but amended such that it also allows for the consideration of expanded settlements in the area of search.</p>				<p>the Housing Market Area is being provided in addition to meeting our own housing needs, in accordance with what the council considers to be an appropriate strategy. Ongoing cooperation with Duty to Cooperate bodies has taken place and informed the plans strategic approach, as detailed in our Duty to Cooperate Topic Paper. Emerging Statements of Common Ground are being prepared with all neighbouring and HMA authorities to reflect our respective positions.</p> <p>The council has considered locations/sites for a new settlement through its Sustainability Appraisal and Housing Site Assessment Topic Paper 2024 and was unable to identify any suitable locations for a new settlement along the A449 corridor that were demonstrably deliverable in the plan period. A previous version of the plan had identified an area of search for a new settlement to be delivered beyond the plan period, however after considering representations the Council no longer considers this to be necessary or appropriate for this plan to set locational requirements for sites that would come through a future plan. It is not appropriate to prejudge the direction of future Local Plan as this issue should be revisited again once preparation of the next plan commences.</p> <p>No change proposed.</p>
Savills UK Ltd for St Modwen & JM Holt	AGT24-038-04-07	Policy DS4	<p>We consider that the 2024 EDNA underestimates the employment need, with our analysis indicating a shortfall in supply in South Staffordshire alone of between 15ha and 63ha. We therefore object to part b) of policy DS4, which sets out the employment needs for SSDC.</p> <p>The employment land needs for South Staffordshire should be uplifted to address methodological weaknesses within the EDNA, to reflect significant demand arising within the wider FEMA and to embed flexibility in the delivery of employment land.</p>	Yes	No	No	<p>The Council acknowledges there is no one definitive method for undertaking EDNAs as long as they conform to PPG guidance. Our EDNA is PPG compliant having considered a number of methods the derive need (e.g. past trends, labour demand modelling) and makes reasoned adjustments to arrive an objectively assessed need for employment land that the Council considers to be robust and justified.</p> <p>No change proposed.</p>
Nurton Development Ltd	AGT24-030-01-03	Policy DS4	<p>The reference in the policy to a need of 62.4ha and supply of 107.45 is unreliable and should be subject to reassessment, both quantitatively and qualitatively. Labour Demand model for identifying need is unreliable with a past trends model more likely to provide an accurate and reliable projection.</p> <p>Nurton's assessment identifies a supply of no greater than</p>	No	No	No	<p>The Council's 2022 Economic Development Needs Assessment (EDNA) and 2024 EDNA update are considered robust assessments and the 62.4ha and 107.45 figures are deemed reliable. The EDNA does consider both labour demand and past trends when arriving at a robust objectively assessed need figure for the district.</p>

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			<p>23.6ha (exc WMI). I54 Western extension and ROF Featherstone were allocated to meet the needs of the Black Country and so should not be included. Nurton identify a need of at least 86.6ha when taking account of an 18.8ha contribution from WMI, The exclusion of 'atypical' development when considering past trends is flawed.</p> <p>The West Midlands Strategic Employment Sites Study 2021 identifies a need for strategic employment sites within the Black Country and South Staffordshire and should be expressly referred to in Policy DS4. This reference underscores the opportunity provided by the M54/M6 link road for unlocking development potential for strategic employment sites.</p>				<p>Whilst it is recognised that the Black Country shortfall of employment land supported the case of allocating i54 western extension and ROF Featherstone, the supply of employment land (including at i54 western extension and ROF Featherstone) has been reconsidered holistically through the EDNAs, which has determined the surplus employment land in the district that could form a potential unmet needs contribution, which is increased further by the proposed allocation at M6 Junction 13. This recognises the overlapping South Staffordshire and Black Country FEMAs. The proposed contribution is considered by the Black Country authorities to be proportionate, as confirmed through the South Staffordshire FEMA Statement of Common Ground.</p> <p>It is recognised that the West Midlands Strategic Employment Site Study (WMSESS) 2021 did identify a market demand for strategic employment sites across the West Midlands without attempting to quantify this demand. A need for strategic employment land has subsequently been reconfirmed through a 2024 update to the study. The 2024 WMSESS does identify opportunity areas for strategic employment in South Staffordshire but identifies indicative phasing for these areas that 'supply should be considered for the end of the period towards 2040'. Given this, and the healthy pipeline of employment land in the district it is considered the recommendations of the 2024 WMSESS should be considered through the next review of the Local Plan. This is the agreed position in the South Staffordshire FEMA Statement of Common Ground.</p>
First City for St Mary's Presbytery and The Archdiocese of Birmingham	AGT24-018-01-03	Policy DS4	<p>The plan target has reduced significantly since the previous 2022 Publication Plan. We are aware of changes to the NPPF 2023 in relation to Green Belt releases. It does not imply that no Green Belt boundary changes should be made, or this should be significantly reduced from previous consultation documents as Green Belt boundary changes should not have been taken lightly.</p> <p>The most position statement across the Great Birmingham HMA confirms there is still a significant shortfall. We consider additional land/sites is required to meet not only the needs of South Staffordshire in the form of a buffer to the housing figures</p>	No	No	No	<p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>Site options have been assessed against a consistent set of planning criteria to determine</p>

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			<p>in the event of both smaller allocated sites or larger SUE sites not delivering as expected but also to assist neighbouring areas as part of the Duty to Co-operate.</p> <p>We are disappointed to see the removal of site 079 Land at Kiddemore Green Road. The site would not only provide much needed family housing but also a range of housing including bungalows and care facilities. The site would also accommodate car parking facilities to assist with the lack of parking in the centre of the village. We therefore consider this site provides a number of benefits that would justify exceptional circumstances to validate its retention in the plan as a proposed allocation.</p>				proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.
Acres Land and Planning for Hallam Land Management	AGT24-001-01-01	Policy DS4	<p>The housing target in the plan is insufficient and equates to a reduction of 3,608 homes from the 2022 Publication Plan. The scale of housing needs is not reducing but is actually increasing. Whilst there is a clear logic to focusing the new housing allocations in the Tier 1 settlements, there is serious doubt therefore whether the current housing requirement of 4726 dwellings (2023 -2041) meets the District Council's development needs – compared with the 9,089 dwellings prepared in the 2022 Local Plan. The 2024 Publication Local Plan therefore clearly fails the 'positively prepared' and 'justified' tests and it also fails the 'duty to co-operate' test in failing to make an adequate contribution to meeting the wider needs of the Black Country housing market of which South Staffs is a part.</p> <p>We fully support the notion that larger settlements with better accessibility, facilities and services should accommodate the bulk of new housing and that the 'exceptional circumstances' for releasing sites from the green belt should be focused on Tier 1 settlements. If this is the policy decision, then more sites (such as the Sandy Lane, Codsall site) will need to be found in future – and indeed, possibly in this SSDC Local Plan, should the Inspector decide that insufficient sites have been provided overall.</p> <p>The shift towards a capacity-led approach which simply sticks with the current 'stock' of housing allocations based on a reduced housing target demonstrates that the Local Plan has not been 'positively prepared' and is therefore unsound. There would appear to be a clear dichotomy between the Council's approach towards employment and its stance on housing. This is a 'soundness' issue, since it demonstrates the lack of cohesion in the 2024 Publication Plan brought about by the reduction of housing.</p>	Not stated	No	No	<p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>A contribution to unmet needs of authorities in the Housing Market Area is being provided in addition to meeting our own housing needs, in accordance with what the council considers to be an appropriate strategy. Ongoing cooperation with Duty to Cooperate bodies has taken place and informed the plans strategic approach, as detailed in our Duty to Cooperate Topic Paper. Emerging Statements of Common Ground are being prepared with all neighbouring and HMA authorities to reflect our respective positions.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p>
Cerda for Trine Developments	AGT24-011-01-01	Policy DS4	<p>Details of previous Regulation 18 and 19 consultations and the proposed contribution towards the GBBCHMA can be found in the full representation. Policy DS4 facilitates 4,726 homes with a</p>	Yes	No	Yes	<p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in</p>

Submission Local Plan Review  
Schedule of Publication Plan 2024 Representations and Responses

**CHAPTER 5 & POLICIES DS1-DS5: DEVELOPMENT STRATEGY AND SUPPORTING TEXT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			small contribution to the GBBCHMA and plan flexibility of 10%. Evidence exists of a growing unmet housing need and this strategy has the potential to delay the adoption of a sound plan which is a risk to this new strategy.				<p>our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>A contribution to unmet needs of authorities in the Housing Market Area is being provided in addition to meeting our own housing needs, in accordance with what the council considers to be an appropriate strategy. Ongoing cooperation with Duty to Cooperate bodies has taken place and informed the plans strategic approach, as detailed in our Duty to Cooperate Topic Paper. Emerging Statements of Common Ground are being prepared with all neighbouring and HMA authorities to reflect our respective positions.</p>
Gladman Developments Ltd	AGT24-019-01-01	Policy DS4	<p>Previous 4000 home contribution was of a reasonable scale and necessary to address acute housing needs that exist now. There is no question that there remains a well-evidenced and substantial unmet need arising from the GBBCHMA. Given the substantial shortfall, Gladman contend that the proposed contribution to unmet needs of just 640-homes is not positively prepared, justified or effective. To remedy this, an entirely reasonable course of action for the Council to take is to plan for an increased housing requirement incorporating a 4,000-home contribution to GBBCHMA unmet needs, in alignment with the previous Publication Plan (1). If there is no intention to the uplift the housing requirement now, then as an absolute minimum the Plan must contain a review policy which includes an effective and implementable trigger mechanism linked to the publication of a SoCG and/or new satisfactory evidence of unmet housing need informed by the latest sub-regional evidence base and Duty to Cooperate agreements.</p> <p>Gladman at present do not consider that a 10% buffer is sufficient to ensure the Local Plan Review remains robust over the plan period. Given the way the Plan's strategy is so heavily reliant on these two strategic sites, a larger flexibility percentage should be considered in the order of at least 15%. This can be achieved, in the first instance, by maximising development at</p>	Not stated	No	No	<p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>A contribution to unmet needs of authorities in the Housing Market Area is being provided in addition to meeting our own housing needs, in accordance with what the council considers to be an appropriate strategy. Ongoing cooperation with Duty to Cooperate bodies has taken place and informed the plans strategic approach, as</p>



**CHAPTER 5 & POLICIES DS1-DS5: DEVELOPMENT STRATEGY AND SUPPORTING TEXT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>non-Green Belt locations in accordance with national policy through extensions to existing site allocations. One such opportunity clearly exists at 'Land at Weeping Cross (036c)', a proposed allocation adjacent to the town of Stafford.</p>				<p>detailed in our Duty to Cooperate Topic Paper. Emerging Statements of Common Ground are being prepared with all neighbouring and HMA authorities to reflect our respective positions.</p> <p>The Council has included a buffer in housing supply above its proposed requirement which will provide around 10% plan flexibility (as set out in Policy DS4) to allow for any uncertainties around site delivery. It has worked proactively with site promoters and infrastructure providers on its two strategic allocations (Policies SA1-2) to masterplan the sites and create greater certainty over site delivery. The vast majority of sites in the plan are unconstrained greenfield sites and the Council has a very strong track record of delivering major schemes, with only two full applications lapsing over a period of 27 years (1996-2023) as detailed further on our Housing Monitoring and Five-Year Land Supply 2022-2023 document. Given the mix of sites proposed in the plan, the Council therefore consider the 10% plan flexibility to be appropriate.</p> <p>It is not considered necessary to specifically commit to an early review of the plan as a review of the plan to ensure it is kept up to date is already a requirement of national guidance.</p>
Avison Young for Beard, G	AGT24-004-01-02	Policy DS4	<p>Our client is not satisfied that the Council has correctly calculated its local housing need applying the standard method. The correct starting point 364 to 441 dwellings per annum as confirmed by the attached Marrons Housing Needs Assessment. 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.</p>	No	No	No	<p>The Council has applied the Standard Method formula as set out in the NPPF correctly when arriving at our Local Housing Need between 2023 and 2041 of 4086 dwellings, equating to 227 dwellings per annum.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial</p>



**CHAPTER 5 & POLICIES DS1-DS5: DEVELOPMENT STRATEGY AND SUPPORTING TEXT**

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							strategy (spatial option I).
Windsor, R	RES24-255-02	Policy DS4	The plan is not sound. Assessment of housing need should be objective, according to the guidance on housing and economic needs assessment. No indication for the need for flexibility on this guidance (ie. the 10% extra 473 homes in SSDC are surplus to need and have an impact on site 036c). This policy is not aligned with amendments 013 dated 15/12/2020 and 010 dated 16/12/2020.	Not stated	No	Not stated	The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).  Ensuring plans can respond to changing circumstances is a key requirement of Local Plans and the principle of 'over allocation' to ensure the plan is flexible in this regard has been long established. Given the mix of sites proposed in the plan, the Council consider the 10% plan flexibility to be appropriate.
RPS Group for Persimmon Homes	AGT24-037-02-04	Policy DS4	Unclear if employment growth has been taken into account in determining the appropriate minimum level of housing need to be provided for in the SSLP. Specifically the West Midlands Interchange proposal, which means that in total there is still 141.9ha which is not anticipated to meet either local employment need nor address the unmet employment needs from the Black Country. The substantial over-allocation of employment land in the SSLP, including that resulting from the WMI project, will need an additional labour supply to fill the new jobs provided. The Council's employment evidence suggest that the additional jobs, including those provided at WMI, will be met by the existing South Staffordshire labour force through either reduced unemployment or reduced out-commuting (see Economic Development Needs Assessment 2020-2040, June 2022, paragraph 0.56). However, it remains unclear whether the potential impact on the demand for housing within the District, as a result of the jobs growth required to support the over-supply of employment, has been taken into account in determining the minimum local housing need figure now proposed in the SSLP. RPS recommends that the Council revisits its assessment of local housing need in order to properly assess the impact of planned future employment growth in the District and consider the implications on housing demand of the significant level of over-supply of employment land identified in the SSLP.  The contribution to unmet needs of neighbouring authorities should be increased to at least 4200 dwellings to take account of the extra year of the plan.  The Council is still relying on the 2018 Strategic Growth Study to justify the 4000 home contribution, although the shortfall now extends 3 years beyond the end date of that study to 2039.	Yes	No	Not stated	Representation appears to relate to the Council's 2022 Regulation 19 Publication Plan, rather than the 2024 Publication Plan.  The Council has used the standard method formula to determine our housing need and does not consider that exceptional circumstances exist to deviate from its use. The Council considers that the use of the standard method as the basis of our housing requirement is justified and an appropriate strategy.  Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.  The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).

**CHAPTER 5 & POLICIES DS1-DS5: DEVELOPMENT STRATEGY AND SUPPORTING TEXT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			Other relevant information (including data migration and commuting flows between the District and the Black Country) has been ignored in favour of the focus solely on the SGS as the basis for the scale of the redistribution. Both migration and commuting flow data shows a very strong functional relationship between South Staffordshire and the Black Country. Therefore, RPS contend that other data sources should be taken into account and which indicate that the contribution should be higher than 4,000.				
Bruton Knowles for owners of land off Primrose Close	AGT24-007-02-02	Policy DS4	We object to the level of housing growth being planned for and the Council's proposed change in their housing growth strategy from that set out in the 2022 Publication Plan. The Plan seeks to reduce the amount of housing planned for in South Staffordshire as a reflection of the new NPPF. The new NPPF does not alter the fact that sufficient additional housing should be being planned for across the district in the most sustainable locations. The revised plan does not justify the reduction in housing numbers nor identify how future housing need will be allowed for.	Not stated	No	Not stated	Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.  The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).
Knight Frank for Pland Estates Ltd	AGT24-024-01-01	Policy DS4	Given the major allocations in the plan including at Penkrige, it considered that policies should be set to look further ahead by at least 30 years, which increases the plan period from 2023-2041 to 2023 to 2053. Otherwise, the local plan is not considered to be compliant with para 22 NPPF.  The removal of an additional 4,000 dwellings, as proposed in the South Staffordshire Local Plan, does not align with para 26 NPPF which explicitly states that "joint working should help to determine where (...) development needs that cannot be met wholly within a particular plan area could be met elsewhere". The removal of the contribution of 4,000 dwellings is considered to make the plan unsound, as per the definition of para 35 NPPF, stating that plans should be "positively prepared"	Yes	No	Yes	It is not considered necessary for the plan to look further ahead by at least 30 years as all sites, including land north of Penkrige can be delivered within the proposed plan period to 2041.  Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.  The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).

**CHAPTER 5 & POLICIES DS1-DS5: DEVELOPMENT STRATEGY AND SUPPORTING TEXT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							A contribution to unmet needs of authorities in the Housing Market Area is being provided in addition to meeting our own housing needs, in accordance with what the council considers to be an appropriate strategy. Ongoing cooperation with Duty to Cooperate bodies has taken place and informed the plans strategic approach, as detailed in our Duty to Cooperate Topic Paper. Emerging Statements of Common Ground are being prepared with all neighbouring and HMA authorities to reflect our respective positions.
Pegasus Group for BDW Trading Limited	AGT24-031-01-02	Policy DS4	<p>The Districts own housing requirement based on the standard method of 4,086 homes is not justified. We consider that there are exceptional circumstances which justify an alternative approach to assessing housing needs. The economic prosperity of the district is being guided by the economic growth scenario considered in the South Staffordshire Economic Development Needs Assessment Update (2024) (EDNA). The EDNA notes how the number of jobs generated by the growth scenario is significantly higher than the number of jobs generated by the local housing need figure. The district already has very significant gross commuting flows and we consider these will be exacerbated by the local housing need figure. On this basis, it is justified to align jobs and housing growth which would have a positive effect of reducing commuting flows. The housing requirements should be increased to align with economic growth and Dunston Garden Village should be allocated as a new settlement.</p> <p>The 640-home contribution towards the unmet need of the GBBCHMA is predicated on limiting Green Belt release to Tier 1 settlements. The contribution has not been informed by effective joint working on cross-boundary strategic matters and has not been informed by agreements with the GBBCHMA. Furthermore, the contribution is not justified.</p> <p>The Council have also chosen to alter the Green Belt boundaries in the Publication Plan as there are exceptional circumstances to do so including assisting with unmet housing needs. The updates to the NPPF do not justify a reduction in the contribution towards unmet needs. There is also no evidence to suggest that Strategic Growth Study 2018 is no longer up to date, but irrespective, there is still a significant unmet housing need. Evidence points towards a worsening situation in terms of unmet housing needs which have increased, not decreased, since the first Publication Plan. The 640-home contribution will do little to assist the unmet needs and the reduction in the contribution largely defers the issue to other authorities within the GBBCHMA who are not as far advanced in their plan-making process.</p>	Not stated	No	No	<p>The Council has used the standard method formula to determine our housing need and does not consider that exceptional circumstances exist to deviate from its use. The Council considers that the use of the standard method as the basis of our housing requirement is justified and an appropriate strategy.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>A contribution to unmet needs of authorities in the Housing Market Area is being provided in addition to meeting our own housing needs, in accordance with what the council considers to be an appropriate strategy. Ongoing cooperation with Duty to Cooperate bodies has taken place and informed the plans strategic approach, as detailed in our Duty to Cooperate Topic Paper. Emerging Statements of Common Ground are being prepared with all neighbouring and HMA authorities to reflect our respective positions.</p> <p>The Council has included a buffer in housing</p>

**CHAPTER 5 & POLICIES DS1-DS5: DEVELOPMENT STRATEGY AND SUPPORTING TEXT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>There is currently a 10% buffer in the supply, whereas the first Publication Plan had a buffer of 13% which was considered necessary for soundness. No justification has been provided for reducing the buffer and we consider that it should at least remain at 13%.</p> <p>Object to Policy DS6 from the 2022 Publication Plan that set out a longer term aspiration for a new settlement along the A449 corridor. it was entirely appropriate for the first Publication Plan to set the direction of growth beyond the plan period. Indeed, that approach is supported by national policy in the context of identifying safeguarded land, where necessary, to meet longer-term development needs stretching well beyond the plan period. It was also entirely appropriate for that growth be directed to the transport corridor given the findings of the Strategic Growth Study 2018. Nothing has changed since the first Publication Plan to indicate that Policy DS6 was unsound. The topic paper finds that the settlement options do not perform so well as to change the preferred spatial housing strategy. However, planning for the longer-term development needs beyond the plan period would not alter the preferred spatial housing strategy for the plan period. Supporting documents demonstrate that the highways and access to services issues in the housing sit assessment topic paper can be addressed.</p> <p>This policy should have a clear requirement within it to ensure the Council undertake regular annual monitoring of housing delivery and set out what actions will be taken if housing delivery is slow to progress or drops below a five-year supply, which in our view should trigger a full review of the Local Plan. This will be critical if no further unmet needs from the GBBCHMA are to be met and no additional allocations are made.</p>				<p>supply above its proposed requirement which will provide around 10% plan flexibility (as set out in Policy DS4) to allow for any uncertainties around site delivery. It has worked proactively with site promoters and infrastructure providers on its two strategic allocations (Policies SA1-2) to masterplan the sites and create greater certainty over site delivery. The vast majority of sites in the plan are unconstrained greenfield sites and the Council has a very strong track record of delivering major schemes, with only two full applications lapsing over a period of 27 years (1996-2023) as detailed further on our Housing Monitoring and Five-Year Land Supply 2022-2023 document. Given the mix of sites proposed in the plan, the Council therefore consider the 10% plan flexibility to be appropriate.</p> <p>It is not considered necessary for the plan to look further ahead by at least 30 years as all sites, including land north of Penkridge can be delivered within the proposed plan period to 2041.</p> <p>The Council considers that it would be inappropriate to release additional land from the Green Belt for safeguarded land through this Local Plan, given the need for any such release to be justified by exceptional circumstances.</p> <p>It is acknowledged that the approach to future Green Belt release will be considered through an updated Strategic Growth Study across the GBBCHMA which South Staffordshire will be an active partner in, and it is right to consider this issue strategically across this wider functional geography. To date, no GBBCHMA authority has requested that South Staffordshire provide additional safeguarded land for longer term unmet needs, nor has this been required in recent examinations in the GBBCHMA. Given these factors and the requirement in national policy to review the plan in whole or in part every 5 years, it is not considered appropriate or necessary to release safeguarded land at this stage.</p> <p>It is not considered necessary to specifically commit to an early review of the plan as a review</p>



**CHAPTER 5 & POLICIES DS1-DS5: DEVELOPMENT STRATEGY AND SUPPORTING TEXT**

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							of the plan to ensure it is kept up to date is already a requirement of national guidance.
Stantec for L&Q Estates Limited	AGT24-041-01-02	Policy DS4	<p>The justification for the reduced housing target is that the delay the preparation of the Local Plan means that the Strategic Growth Study (SGS) (2018) is 'out of date'. This argument is flawed as the SGS has formed part of the evidence for other emerging plans including those at EiP and have not found to be unsound by the appointed inspectors. It is also referenced in the August 2022 HMA wide SoCG as that the Strategic Growth Study represents the only independent document providing GBBCHMA shortfall evidence. Thirdly, even if it is accepted that the Strategic Growth Study is out of date, it is inappropriate for the Council to progress a Local Plan in an evidence base vacuum. Instead, the Council should be working with the relevant Local Authorities to update the Strategic Growth Study to inform plan making in the HMA. Fourthly, more recent evidence across the HMA from Birmingham and the Black Country authorities' evidence bases produced between 2022 and 2024 identifies that the unmet housing need to 2041/42 stands at circa. 108,906 homes.</p> <p>The plan includes Green Belt development and given that the principle of Green Belt release is engaged, it becomes a matter of scale. The Council has previously tested the provision of 4,000 homes through the Local Plan (and sustainability appraisal) process and found it to be sustainable. It is therefore submitted that the Council should revert to the level of housing provision provided for within the previous iteration of the Local Plan and attempt to address housing needs in a more positive manner.</p>	Not stated	No	Not stated	<p>The SGS 2018 quantified the shortfall and made spatial recommendations based on this in 2017/18, and so is now 6 years old and so it is the council's position that this is out of date evidence. This is supported by the fact that there is a commitment to update the SGS across the HMA, including from South Staffordshire Council.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p>
Emery Planning for Wain Estates	AGT24-016-02-06	Policy DS4	<p>Consider that the proposed contribution towards meeting unmet needs within the GBBCHMA should be far higher. It is disappointing that the Council has sought to amend the plan from the previous Regulation 19 version to reduce the housing requirement substantially. This would appear to be indicative of a negative approach and the opposite of 'significantly boosting the supply of homes'.</p> <p>Justification for the 640 contribution to GBBCHMA is not clear when levels of unmet needs are increasing and so the approach is extremely negative and unjustified. We therefore consider that the Council should revert to the previously proposed contribution of 4,000 dwellings, and for this to be agreed through a Statement of Common Ground. Even if the precise extent of the shortfall cannot be established, the plan should seek to deliver thousands more homes based upon the acknowledged shortfall of at least 78,415 homes across the GBBCHMA.</p> <p>Against a housing requirement of 4,726 dwellings over the plan</p>	Not stated	No	No	<p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>Total land supply in Table 8 is 5199 dwellings allowing for 10% plan flexibility. The 10% plan</p>

**CHAPTER 5 & POLICIES DS1-DS5: DEVELOPMENT STRATEGY AND SUPPORTING TEXT**

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			<p>period, a total housing land supply of just 5,118 dwellings is identified at Table 8 of the plan. Therefore, the supply provides a flexibility allowance of just 392 dwellings, or 8%. We consider that this level of flexibility is insufficient. A flexibility allowance of 20% would be appropriate. The Guildford Local Plan is relevant given that Green Belt was released to provide flexibility in the housing land supply and a flexibility allowance of 37% was provided there.</p> <p>The plan must provide sufficient flexibility in the housing land supply and there is a need to release additional deliverable sites to provide a five-year housing land supply. Even if there were to be a degree of over-provision, there would be wider benefits of providing a level of housing in excess of the minimum requirement, particularly in the context of the very significant level of unmet need across the GBBCHMA.</p> <p>The Council will need to publish its latest 5 year housing land supply position with a base date aligning with the adoption of the plan and clarify which evidence it wishes to rely upon for the examination. Once the Council has published its new position, we respectfully request the opportunity to review and comment.</p>				<p>flexibility (as set out in Policy DS4) is to allow for any uncertainties around site delivery. The Council has worked proactively with site promoters and infrastructure providers on its two strategic allocations (Policies SA1-2) to masterplan the sites and create greater certainty over site delivery. The vast majority of sites in the plan are unconstrained greenfield sites and the Council has a very strong track record of delivering major schemes, with only two full applications lapsing over a period of 27 years (1996-2023) as detailed further on our Housing Monitoring and Five-Year Land Supply 2022-2023 document. Given the mix of sites proposed in the plan, the Council therefore consider the 10% plan flexibility to be appropriate.</p> <p>The Council is confident it will be able to demonstrate a 5-year supply on adoption of the plan and has set out an indicative housing supply trajectory in Appendix G of the plan.</p>
Stansgate Planning for Payne Hicks Beach Trust Corporation Ltd	AGT24-039-01-03	Policy DS4	<p>The Publication Plan fails to provide for sufficient housing delivery to meet the needs of South Staffordshire District alongside a proportionate level of housing to assist in addressing the unmet needs of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). The Plan is not therefore sound.</p> <p>There is no indication that the level of unmet housing need arising from Birmingham and the Black Country Authorities will have diminished or disappeared since the previous Strategic Growth Study of 2018.</p> <p>The current Publication Plan approach is based on the changes to the NPPF that came forward in December 2023. The only change to national policy is confirmation that there is no requirement to review Green Belt boundaries, however, this was always the case, just not explicitly stated. Paragraph 140 of both the 2021 NPPF and the September 2023 NPPF stated that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified. This test remains the same and there are not any more stringent tests to be applied now than there were in respect of the previous 2022 Publication Plan. Therefore, there is no national policy change that would rationalise this change of approach over that of the previous Publication Plan.</p> <p>Whilst growth avoiding use of Green Belt would be an</p>	No	No	No	<p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p>



**CHAPTER 5 & POLICIES DS1-DS5: DEVELOPMENT STRATEGY AND SUPPORTING TEXT**

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			<p>appropriate strategy where this enables a sufficient level of housing to be delivered, the requirement for the Plan to be positively prepared and to be based on effective joint working with neighbouring authorities on strategic matters, renders this approach inappropriate and unsound in the case of South Staffordshire.</p> <p>In order to assist in meeting the unmet housing needs of the HMA it is entirely appropriate, fully evidenced and justified that a review of Green Belt boundaries should be undertaken as part of the plan-making process. This should form part of this Local Plan and an assessment of Green Belt boundaries to enable the provision of an additional 3,360 new homes (over the numbers set out in the Publication Plan 2024) across the plan period must be undertaken in order for the Plan to be considered sound.</p>				
Vista Planning Ltd for Hampton Oak Ltd	AGT24-042-01-01	Policy DS4	<p>Given that accommodating the unmet need of neighbouring authorities underpins the soundness tests of positive preparation and local plan effectiveness, the significant reduction (by 3,360 homes) in the plan's contribution to the GBBCHMA's unmet need (in comparison to the last submission version of the plan) can at best be described as illogical and renders to plan unsound.</p> <p>The duty to cooperate prevails and as such, we assert that there remains a need for this plan to play its part in addressing this growing unmet HMA need through the allocation of more homes, which for this predominately Green Belt authority, must mean making the most of sustainable growth opportunities in the few non Green Belt locations within the district. The proposed 640 home contribution to the GBBCHMA represents a 2% contribution to the overall 'best case' c.35,000 homes shortfall to 2031. In our view, and particularly given the strong spatial connection that South Staffs has with the Black Country, the plan needs to deliver a much higher percentage contribution.</p>	No	No	No	<p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p>
RCA Regeneration for Barberrry Developments	AGT24-036-01-02	Policy DS4	<p>The unmet need identified in paragraphs 5.9 to 5.11 attributed to the authorities in the Black Country and Birmingham have as much as 106,653 homes worth of unmet need (78,415 from Birmingham and 28,643 from the Black Country). Wolverhampton and Dudley alone account for over 12,000 homes as unmet need. It appears that South Staffordshire have all but abandoned their previous approach of meeting c4,000 units of this unmet need via the Duty to Cooperate, and since then very little has changed to warrant this new approach. Policy DS4 should make clear that the delivery of 4,726 homes is a minimum target and should encourage sustainable development on all sites where all other development plan policies are met.</p>	No	No	No	<p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							<p>A contribution to unmet needs of authorities in the Housing Market Area is being provided in addition to meeting our own housing needs, in accordance with what the council considers to be an appropriate strategy. Ongoing cooperation with Duty to Cooperate bodies has taken place and informed the plans strategic approach, as detailed in our Duty to Cooperate Topic Paper. Emerging Statements of Common Ground are being prepared with all neighbouring and HMA authorities to reflect our respective positions.</p> <p>It is no considered necessary for the 4726-housing requirement to be expressed as a minimum. Any over delivery on allocations above the housing requirement, or windfall sites coming forward outside the plan are by their nature uncertain.</p>
RCA Regeneration for Seven Capital	AGT24-036-03-02	Policy DS4	<p>The unmet need identified in paragraphs 5.9 to 5.11 attributed to the authorities in the Black Country and Birmingham have as much as 106,653 homes worth of unmet need (78,415 from Birmingham and 28,643 from the Black Country). Wolverhampton and Dudley alone account for over 12,000 homes as unmet need. It appears that South Staffordshire have all but abandoned their previous approach of meeting c4,000 units of this unmet need via the Duty to Cooperate, and since then very little has changed to warrant this new approach. Policy DS4 should make clear that the delivery of 4,726 homes is a minimum target and should encourage sustainable development on all sites where all other development plan policies are met.</p>	Not stated	No	No	<p>Justification for the council’s spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district’s growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan’s ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council’s Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>A contribution to unmet needs of authorities in the Housing Market Area is being provided in addition to meeting our own housing needs, in accordance with what the council considers to be an appropriate strategy. Ongoing cooperation with Duty to Cooperate bodies has taken place and informed the plans strategic approach, as detailed in our Duty to Cooperate Topic Paper. Emerging Statements of Common Ground are being prepared with all neighbouring and HMA authorities to reflect our respective positions.</p> <p>It is no considered necessary for the 4726-</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							housing requirement to be expressed as a minimum. Any over delivery on allocations above the housing requirement, or windfall sites coming forward outside the plan are by their nature uncertain.
RCA Regeneration for St Phillips	AGT24-036-04-02	Policy DS4	The unmet need identified in paragraphs 5.9 to 5.11 attributed to the authorities in the Black Country and Birmingham have as much as 106,653 homes worth of unmet need (78,415 from Birmingham and 28,643 from the Black Country). Wolverhampton and Dudley alone account for over 12,000 homes as unmet need. It appears that South Staffordshire have all but abandoned their previous approach of meeting c4,000 units of this unmet need via the Duty to Cooperate, and since then very little has changed to warrant this new approach. Policy DS4 should make clear that the delivery of 4,726 homes is a minimum target and should encourage sustainable development on all sites where all other development plan policies are met.	Not stated	No	No	<p>Justification for the council’s spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district’s growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan’s ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council’s Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>A contribution to unmet needs of authorities in the Housing Market Area is being provided in addition to meeting our own housing needs, in accordance with what the council considers to be an appropriate strategy. Ongoing cooperation with Duty to Cooperate bodies has taken place and informed the plans strategic approach, as detailed in our Duty to Cooperate Topic Paper. Emerging Statements of Common Ground are being prepared with all neighbouring and HMA authorities to reflect our respective positions.</p> <p>It is no considered necessary for the 4726-housing requirement to be expressed as a minimum. Any over delivery on allocations above the housing requirement, or windfall sites coming forward outside the plan are by their nature uncertain.</p>
RCA Regeneration for Richborough Estates	AGT24-036-02-02	Policy DS4	The unmet need identified in paragraphs 5.9 to 5.11 attributed to the authorities in the Black Country and Birmingham have as much as 106,653 homes worth of unmet need (78,415 from Birmingham and 28,643 from the Black Country). Wolverhampton and Dudley alone account for over 12,000 homes as unmet need. It appears that South Staffordshire have all but abandoned their previous approach of meeting c4,000 units of this unmet need via the Duty to Cooperate, and since	Not stated	No	No	<p>Justification for the council’s spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district’s growth opportunities against the constraints that Green Belt land and sustainability factors places on the</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			then very little has changed to warrant this new approach. Policy DS4 should make clear that the delivery of 4,726 homes is a minimum target and should encourage sustainable development on all sites where all other development plan policies are met.				<p>plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>A contribution to unmet needs of authorities in the Housing Market Area is being provided in addition to meeting our own housing needs, in accordance with what the council considers to be an appropriate strategy. Ongoing cooperation with Duty to Cooperate bodies has taken place and informed the plans strategic approach, as detailed in our Duty to Cooperate Topic Paper. Emerging Statements of Common Ground are being prepared with all neighbouring and HMA authorities to reflect our respective positions.</p> <p>It is no considered necessary for the 4726-housing requirement to be expressed as a minimum. Any over delivery on allocations above the housing requirement, or windfall sites coming forward outside the plan are by their nature uncertain.</p>
Evolve Planning & Design for Lovell Homes	AGT24-017-05-02	Policy DS4	Lovell Homes generally supports the policy approach set out in Policy DS4.	Yes	No	Yes	Support noted.
Evolve Planning & Design for Lovell Homes	AGT24-017-05-02	Policy DS4	<p>Unmet need from neighbouring authorities – details of unmet need in paragraphs 3.8 – 3.15 in full representation. Lovell Homes supports the Council in providing a contribution to assist in meeting these unmet needs, however, raises concerns that this is not evidence based. The capacity-led approach will need to be explored and tested through the EiP.</p> <p>Economic uplift – further consideration should be given to whether the minimum local housing need figure derived from the standard method would support the necessary growth in the working age population to create a balanced community within South Staffordshire to support such jobs growth. Further evidence is necessary to consider the balance between jobs and the working age population that would be necessary to satisfy the jobs demand.</p>	Yes	No	Yes	<p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>The Council has used the standard method</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							formula to determine our housing need and does not consider that exceptional circumstances exist to deviate from its use. The Council considers that the use of the standard method as the basis of our housing requirement is justified and an appropriate strategy.
Evolve Planning & Design for Keon Homes	AGT24-017-04-02	Policy DS4	Keon Homes generally supports the policy approach set out in Policy DS4.	Yes	No	Yes	Support noted.
Evolve Planning & Design for Keon Homes	AGT24-017-04-02	Policy DS4	<p>Unmet need from neighbouring authorities – details of unmet need in paragraphs 3.8 – 3.15 in full representation. Keon Homes supports the Council in providing a contribution to assist in meeting these unmet needs, however, raises concerns that this is not evidence based. The capacity-led approach will need to be explored and tested through the EiP.</p> <p>Economic uplift – further consideration should be given to whether the minimum local housing need figure derived from the standard method would support the necessary growth in the working age population to create a balanced community within South Staffordshire to support such jobs growth. Further evidence is necessary to consider the balance between jobs and the working age population that would be necessary to satisfy the jobs demand.</p>	Yes	No	Yes	<p>Justification for the council’s spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district’s growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan’s ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council’s Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>The Council has used the standard method formula to determine our housing need and does not consider that exceptional circumstances exist to deviate from its use. The Council considers that the use of the standard method as the basis of our housing requirement is justified and an appropriate strategy.</p>
Evolve Planning & Design for Four Ashes Road Ltd	AGT24-017-03-02	Policy DS4	Four Ashes Road Ltd generally supports the policy approach set out in Policy DS4.	Yes	No	Yes	Support noted.
Evolve Planning & Design for Four Ashes Road Ltd	AGT24-017-03-02	Policy DS4	<p>Unmet need from neighbouring authorities – details of unmet need in paragraphs 3.8 – 3.15 in full representation. Four Ashes Road Ltd supports the Council in providing a contribution to assist in meeting these unmet needs, however, raises concerns that this is not evidence based. The capacity-led approach will need to be explored and tested through the EiP.</p> <p>Economic uplift – further consideration should be given to whether the minimum local housing need figure derived from the standard method would support the necessary growth in the</p>	Yes	No	Yes	<p>Justification for the council’s spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district’s growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan’s ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home</p>



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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			working age population to create a balanced community within South Staffordshire to support such jobs growth. Further evidence is necessary to consider the balance between jobs and the working age population that would be necessary to satisfy the jobs demand.				contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).  The Council has used the standard method formula to determine our housing need and does not consider that exceptional circumstances exist to deviate from its use. The Council considers that the use of the standard method as the basis of our housing requirement is justified and an appropriate strategy.
Evolve Planning & Design for Cameron Homes	AGT24-017-02-01	Policy DS4	Cameron Homes generally supports the policy approach set out in Policy DS4.	Yes	No	Yes	Support noted.
Evolve Planning & Design for Cameron Homes	AGT24-017-02-01	Policy DS4	Unmet need from neighbouring authorities – details of unmet need in paragraphs 3.8 – 3.15 in full representation. Cameron Homes supports the Council in providing a contribution to assist in meeting these unmet needs, however, raises concerns that this is not evidence based. The capacity-led approach will need to be explored and tested through the EiP.  Economic uplift – further consideration should be given to whether the minimum local housing need figure derived from the standard method would support the necessary growth in the working age population to create a balanced community within South Staffordshire to support such jobs growth. Further evidence is necessary to consider the balance between jobs and the working age population that would be necessary to satisfy the jobs demand.	Yes	No	Yes	Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.  The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).  The Council has used the standard method formula to determine our housing need and does not consider that exceptional circumstances exist to deviate from its use. The Council considers that the use of the standard method as the basis of our housing requirement is justified and an appropriate strategy.
Evolve Planning & Design for Bloor Homes	AGT24-017-01-09	Policy DS4	Bloor Homes generally supports the policy approach set out in Policy DS4.  Economic uplift – further consideration should be given to whether the minimum local housing need figure derived from the standard method would support the necessary growth in the working age population to create a balanced community within	Yes	No	Yes	Support noted.  The Council has used the standard method formula to determine our housing need and does not consider that exceptional circumstances exist to deviate from its use. The Council considers that the use of the standard method as the basis

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			South Staffordshire to support such jobs growth. Further evidence is necessary to consider the balance between jobs and the working age population that would be necessary to satisfy the jobs demand.				of our housing requirement is justified and an appropriate strategy.
Evolve Planning & Design for Bloor Homes	AGT24-017-01-09	Policy DS4	Land East of Bilbrook and Additional Land East of Bilbrook - Unmet need from neighbouring authorities – details of unmet need in paragraphs 3.13 – 3.19 in full representation. Bloor Homes supports the Council in providing a contribution to assist in meeting these unmet needs, however, raises concerns that this is not evidence based. The capacity-led approach will need to be explored and tested through the EiP.	Yes	No	Yes	<p>Justification for the council’s spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district’s growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan’s ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council’s Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p>
Evolve Planning & Design for Bloor Homes	AGT24-017-01-18	Policy DS4	The Straits, Coven and Royal's Farm - Unmet need from neighbouring authorities – details of unmet need in paragraphs 2.11 – 2.18 in full representation. Bloor Homes supports the Council in providing a contribution to assist in meeting these unmet needs, however, raises concerns that this is not evidence based. The capacity-led approach will need to be explored and tested through the EiP.	Yes	No	Yes	<p>Justification for the council’s spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district’s growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan’s ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council’s Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p>
Harris Lamb for Folkes	AGT24-022-01-01	Policy DS4	Folkes does not consider that the housing requirement of 4,726 homes has been formulated on a sound basis. Folkes do not consider that the 640 dwelling contribution will adequately address the unmet need that has been identified and that the approach will not be effective as it would not result in effective joint work on cross boundary strategic matters. In light of the fact that the Council had previously confirmed a 4,000 contribution to meeting the unmet needs of the HMA, the reduction to 640 confirms that the plan is not positively prepared and unsound. We recommend that South Staffordshire enter into	Not stated	No	No	<p>Justification for the council’s spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district’s growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan’s ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			further negotiations with adjoining authorities.				<p>contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>A contribution to unmet needs of authorities in the Housing Market Area is being provided in addition to meeting our own housing needs, in accordance with what the council considers to be an appropriate strategy. Ongoing cooperation with Duty to Cooperate bodies has taken place and informed the plans strategic approach, as detailed in our Duty to Cooperate Topic Paper. Emerging Statements of Common Ground are being prepared with all neighbouring and HMA authorities to reflect our respective positions.</p>
Harris Lamb for Heyfield Developments Ltd	AGT24-022-02-01	Policy DS4	HD does not consider that the housing requirement of 4,726 homes has been formulated on a sound basis. HD do not consider that the 640 dwelling contribution will adequately address the unmet need that has been identified and that the approach will not be effective as it would not result in effective joint work on cross boundary strategic matters. In light of the fact that the Council had previously confirmed a 4,000 contribution to meeting the unmet needs of the HMA, the reduction to 640 confirms that the plan is not positively prepared and unsound. We recommend that South Staffordshire enter into further negotiations with adjoining authorities.	Not stated	No	No	<p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>A contribution to unmet needs of authorities in the Housing Market Area is being provided in addition to meeting our own housing needs, in accordance with what the council considers to be an appropriate strategy. Ongoing cooperation with Duty to Cooperate bodies has taken place and informed the plans strategic approach, as detailed in our Duty to Cooperate Topic Paper. Emerging Statements of Common Ground are being prepared with all neighbouring and HMA authorities to reflect our respective positions.</p>
Savills UK Ltd for FGD Ltd	AGT24-038-03-01	Policy DS4	We object to Policy DS4 and the level of housing growth being planned for and the Council's proposed change in their housing growth strategy. We disagree with SSDC's interpretation of the	Not stated	No	Not stated	<p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in</p>

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			<p>NPPF and their reliance on it to justify the change in approach to growth. We acknowledge that the amended wording allows for authorities to choose whether to review Green Belt boundaries when preparing or updating their Local Plan but there is now no reference to reviews being based on meeting objectively assessed needs and Councils have always had to demonstrate that exceptional circumstances exist. There is nothing in the NPPF which restricts the amount of Green Belt land that can be released. SSDC are still choosing to release Green Belt land for housing so therefore consider that exceptional circumstances exist to release Green Belt. We therefore fundamentally disagree with SSDC's interpretation of the policy and the use of the revised NPPF to justify the change in strategy to reduce Green Belt release.</p> <p>The policy states there is a 10% buffer but this just comprises the proposed 640 dwelling contribution. This is not considered to provide a sufficient buffer and is reliant on all of the proposed supply (Table 8 in the plan) to be delivered which only amounts to 5,199 dwellings. This is far from aspirational (NPPF paragraph 16).</p> <p>Despite the evidence demonstrating that the GBHMA shortfall has significantly increased, SSDC have chosen to reduce their contribution by 3,360 dwellings. The plan is therefore not sound because a reduction in housing to support the neighbouring shortfall has not been justified (NPPF paragraph 35). SSDC's 2022 plan and evidence base demonstrated that the district could accommodate 4,000 dwellings towards the GBHMA shortfall. We therefore know that SSDC does have capacity to practically deliver more than 640 dwellings towards the shortfall. The only thing to have changed since this consultation is a revised NPPF which we consider SSDC has interpreted incorrectly.</p>				<p>our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>The Council has included a buffer in housing supply above its proposed requirement which will provide around 10% plan flexibility (as set out in Policy DS4) to allow for any uncertainties around site delivery. It has worked proactively with site promoters and infrastructure providers on its two strategic allocations (Policies SA1-2) to masterplan the sites and create greater certainty over site delivery. The vast majority of sites in the plan are unconstrained greenfield sites and the Council has a very strong track record of delivering major schemes, with only two full applications lapsing over a period of 27 years (1996-2023) as detailed further on our Housing Monitoring and Five-Year Land Supply 2022-2023 document. Given the mix of sites proposed in the plan, the Council therefore consider the 10% plan flexibility to be appropriate.</p>
Harris Lamb for Redrow Homes	AGT24-022-03-04	Policy DS4	Paragraph 22 of the Framework confirms that strategic policies should look ahead over a minimum 15-year period from adoption. The proposed plan period would accord with this if the Plan is adopted in 2026. Should it not be adopted by this time, the Council should consider extending the plan period by a further year or two to accommodate any delay with its adopted.	Yes	No	Not stated	The Council considers that adoption by early 2026 to be ambitious by realistic. It is accepted that if this is not the case then it will impact on the end of the plan period.
Harris Lamb for Redrow Homes	AGT24-022-03-04	Policy DS4	The basis upon which the 640 contribution towards the Black Country has been arrived at is less clear. It is noted that the First Publication Plan that was consulted upon in 2022 identified a capacity for 4,000 homes to meet the needs of the wider HMA. Clearly at that time, the Council considered there was capacity	Yes	No	Not stated	Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper



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			<p>to deliver 4,000 houses to meet the needs of the HMA. It is not, therefore, clear why the Council are now stating that there is only capacity for 640 dwellings to meet the needs of the wider HMA. The only apparent change would be the change in policy set out in the Framework which states that local planning authorities do not need to review their Green Belt boundaries to meet their development needs. Clearly, prior to the publication of this guidance the Council had identified sufficient capacity to accommodate 4,000 dwellings.</p> <p>Whilst the Council have determined to reduce its contribution to meeting unmet housing needs arising in the HMA from 4,000 to 640 dwellings it still intends to make available over 45 hectares of land for employment needs to meet the needs of the Black Country authorities. Again, exceptional circumstances appear to exist for release of land from the Green Belt to meet employment needs of the authorities but not housing needs. Why are meeting the housing needs of South Staffordshire or the employment land needs of South Staffs and the Black Country considered more important than meeting the housing needs of those in the Black Country and wider HMA?</p> <p>RH do not, therefore, consider that the housing requirement of 4,726 homes has been formulated on a sound basis. Whilst the Local Plan does propose a 640 dwelling contribution to meet the unmet needs arising in the HMA RH do not consider that this contribution will adequately address the unmet need that has been identified and that the approach will not be effective as it would not result in effective joint work on cross boundary strategic matters.</p> <p>Neither do RH agree that the size of the buffer (443 dwellings) or the reliance on windfalls (to the extent that is proposed) would ensure that housing needs both within the District and meeting the unmet needs of the HMA will be met. In order to address RH's concerns, we would wish to see an increased contribution from South Staffordshire to meeting the unmet needs of the HMA. The 4,000 dwelling figure was never tested, and it is wholly insufficient anyway and will not prevent hundreds of thousands of people going without sufficient accommodation.</p>				<p>2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>The windfall allowance of 40 dwellings per annum is evidenced and justified in the SHELAA (2024), with a conservative approach taken to setting this allowance.</p>
Harris Lamb for Redrow Homes	AGT24-022-03-04	Policy DS4	The sources of supply set out in Table 8 total 5,169 dwellings, which exceeds the housing requirement by 443 dwellings. As such, the Council has identified a small flexibility allowance in its supply in order to meet its, and those of the HMA's, housing	Yes	No	Not stated	Total land supply in Table 8 is 5199 dwellings and 10% plan flexibility. The 10% plan flexibility (as set out in Policy DS4) is to allow for any uncertainties around site delivery. The Council has worked proactively with site promoters and



**CHAPTER 5 & POLICIES DS1-DS5: DEVELOPMENT STRATEGY AND SUPPORTING TEXT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			needs. The allowance represents less than 10% of the overall requirement. RH do not consider that this is sufficient as one would typically anticipate a 10% non-implementation rate on allocated sites. Furthermore, the Council are already relying on an 11.5% windfall allowance.				infrastructure providers on its two strategic allocations (Policies SA1-2) to masterplan the sites and create greater certainty over site delivery. The vast majority of sites in the plan are unconstrained greenfield sites and the Council has a very strong track record of delivering major schemes, with only two full applications lapsing over a period of 27 years (1996-2023) as detailed further on our Housing Monitoring and Five-Year Land Supply 2022-2023 document. Given the mix of sites proposed in the plan, the Council therefore consider the 10% plan flexibility to be appropriate.
Harris Lamb for Redrow Homes	AGT24-022-03-04	Policy DS4	In respect of the windfall allowance, whilst we do not dispute that one can be allowed for in the supply RH do not consider that it can continue to deliver as the same rates as per the recent past. Settlement boundaries within the District have not been reviewed and there is, therefore, a dwindling number of opportunities within these to present redevelopment options to increase the supply of housing. RH contend that allocating new sites presents greater certainty that housing needs will be met rather than relying on windfalls coming forward in a sporadic manner.	Yes	No	Not stated	The windfall allowance of 40 dwellings per annum is evidenced and justified in the SHELAA (2024), with a conservative approach taken to setting this allowance.
Berrys for John Davies Farms Ltd	AGT24-006-02-06	Policy DS4	<p>There is a significant reduction in housing provision compared to that detailed in policy DS4 of the November 2022 Publication plan. This decrease in housing provision in the area is a direct consequence of a change in strategy in the 2024 Plan to 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.</p> <p>However, the reasoning provided for the change in strategy, and therefore for the significant reduction in housing provision, is considered inappropriate and unsound. The Plan's strategy also appears inconsistent, as housing provision has been significantly reduced whilst the overall provision of employment land has been bolstered from 99ha. in the 2022 Plan to 107.45ha. in the 2024 Plan.</p> <p>It is recognised that there have been changes to the NPPF since publication of the 2022 Plan. Nonetheless, these changes are not considered sufficient to move away from the 2022 Plan's housing strategy (including Green Belt). The contribution provided in the South Staffordshire Local Plan towards the unmet needs of the Greater Birmingham Housing Market Area should be increased.</p>	Not stated	No	Not stated	<p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p>

**CHAPTER 5 & POLICIES DS1-DS5: DEVELOPMENT STRATEGY AND SUPPORTING TEXT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
RPS Group for IM Land	AGT24-037-01-03	Policy DS4	<p>The second Reg 19 Plan proposes a dramatic reduction in the scale of growth planned for now, in light of wider (unmet) housing need from the BBCHMA as well as sub-regional employment growth proposals planned to come forward in the District (considered below), which does not represent positive planning and is not justified.</p> <p>It is unclear whether employment growth has been taken into account in determining appropriate housing need. Details on employment development can be found in the full representation.</p> <p>The substantial over-allocation of employment land in the second Reg 19 Plan will need an additional labour supply to fill the new jobs provided. From the review of the published evidence undertaken by RPS, this appears not to be the case. Without clarity on this matter, the proposed housing target in the second Reg 19 Plan is not justified and so is not soundly-based. RPS therefore recommends that the Council revisits its assessment of local housing need in order to properly assess the impact of planned future employment growth in the District.</p>	Not stated	No	Not stated	<p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth. The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>The Council has used the standard method formula to determine our housing need and does not consider that exceptional circumstances exist to deviate from its use. The Council considers that the use of the standard method as the basis of our housing requirement is justified and an appropriate strategy.</p>
RPS Group for IM Land	AGT24-037-01-03	Policy DS4	<p>Full details of the unmet need in the GBBCHMA can be found in the full representation.</p> <p>A contribution of less than 1% of the unmet housing need from elsewhere in the BBCHMA now proposed in the second Reg 19 plan does not, in our view, make sufficient provision for housing and is not positively prepared. The proposed strategy revision is not soundly-based.</p> <p>Increase the contribution towards the unmet need of the Black Country and Birmingham to properly reflect increasing scale of the shortfall and the functional relationship with the District.</p>	Not stated	No	Not stated	<p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p>
Savills UK Ltd for Clowes Developments	AGT24-038-02-02	Policy DS4	<p>Clowes object to DS4 as written because it is not justified, effective or positively prepared. The local housing need has been calculated using the standard methodology, which is a minimum. The Council should present evidence as to why its proposed housing figure does not require any additional uplift or buffering, due to economic growth for example. The policy states there is a 10% buffer, but this just comprises the contribution to the GBBCHMA, this is not considered to provide any buffer and is</p>	Yes	No	No	<p>The Council has used the standard method formula to determine our housing need and does not consider that exceptional circumstances exist to deviate from its use. The Council considers that the use of the standard method as the basis of our housing requirement is justified and an appropriate strategy.</p> <p>The 10% 'over allocation' for plan flexibility is in</p>

**CHAPTER 5 & POLICIES DS1-DS5: DEVELOPMENT STRATEGY AND SUPPORTING TEXT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			reliant on all of the proposed supply to be delivered.				addition to our Local Housing Need requirement and 640 home contribution to unmet needs.
Savills UK Ltd for Clowes Developments	AGT24-038-02-02	Policy DS4	<p>It is unclear how the 640-dwelling contribution to the GBBCHMA is considered acceptable despite an increase in the housing shortfall, or how SSDC propose to distribute these dwellings. The reduction in contribution means the Plan is not justified or effective. It is also unclear how SSDC contribution towards housing has decreased but the contribution towards employment has increased. This will lead to unsustainable patterns of travel as a greater number of people have to commute into the district for employment. It is also worth noting that SSDC were previously vocal in their objection to Plans being produced by other GBBCHMA authorities which proposed a minimal contribution.</p> <p>The housing requirement should be increased to provide a buffer to the minimum local housing need and reflect a larger contribution towards the GBBCHMA. Suitable justification for the HMA contribution figure, along with further evidence to demonstrate on-going and effective joint working with the HMA is required.</p>	Yes	No	No	<p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>A contribution to unmet needs of authorities in the Housing Market Area is being provided in addition to meeting our own housing needs, in accordance with what the council considers to be an appropriate strategy. Ongoing cooperation with Duty to Cooperate bodies has taken place and informed the plans strategic approach, as detailed in our Duty to Cooperate Topic Paper. Emerging Statements of Common Ground are being prepared with all neighbouring and HMA authorities to reflect our respective positions.</p>
Savills UK Ltd for Clowes Developments	AGT24-038-02-02	Policy DS4	We consider a functional relationship exists in the form of the Dudley Travel to Work Area (TTWA). Clowes Development's site at Lawnswood Road is located within the Dudley TTWA. TTWAs are based on statistical analysis rather than administrative boundaries, we consider that such measures should also be used when determining the weight given to functional relationships with other LAs.	Yes	No	No	There are multiple methods to determining functional geographies. For housing the Greater Birmingham and Black Country Housing Market Area is considered the most appropriate geography and has been accepted through other local plan examinations.
Lichfields for Richborough Estates	AGT24-026-01-01	Policy DS4	<p>The main criticisms set out in Richborough's previous response to the 2022 PP (Appendix 3) largely hold true with this latest iteration. There is a clear need for additional employment land within the District to meet not just only the District's own employment needs, but to assist in addressing shortfalls arising from the Black Country authorities.</p> <p>The calculations of need in the 2024 EDNA update is highly complex and relies on mixing and matching projections.</p>	No	No	No	<p>The Council's 2022 Economic Development Needs Assessment (EDNA) and 2024 EDNA update are considered robust assessments and the 62.4ha and 107.45ha (89.96ha pipeline +17.6ha new allocation) figures are deemed reliable. The EDNA does consider both labour demand and past trends when arriving at a robust objectively assessed need figure for the district.</p> <p>The EDNA uses the 'Growth Scenario' as a basis</p>

**CHAPTER 5 & POLICIES DS1-DS5: DEVELOPMENT STRATEGY AND SUPPORTING TEXT**

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			<p>Richborough have concerns regarding the robustness of the EDNA's employment land calculations and considers that a more aspirational approach ought to have been progressed. The loss replacement of 12.1 ha is based on a miscalculation of the annual average of committed losses, which, if corrected, would increase the adjustment by around 8ha (to 20.1 ha). The Completions Trend scenarios significantly underplay the true scale of need by excluding a margin of choice and the substantial levels of strategic sites that have come forward in recent years. Logistics is under-represented in the modelling and the forecasting does not reflect the substantial recent growth in the sector in recent years nor the market intelligence which points to identified shortfalls in available industrial floorspace in South Staffordshire of all sizes and unprecedented demand for large logistics in this prime location. The Growth Scenario is not aspirational enough and should apply a percentage growth rate to the District-level figure. It is not the role of this EDNA to attempt to quantify how much of WMI contributes to the needs of the District. The very modest addition of 44 jobs per annum to uplift the Transport &amp; Storage sector growth is inadequate to meet likely future growth needs and should be greater. The latest forecasting data from Cambridge Econometrics [CE] and Experian should be obtained and remodelled given the passage of time. The March 2024 Experian projections suggest that instead of a net employment growth of 3,500 between 2020 and 2041 as per the November 2021 forecasts, the District's economy will grow by 4,900 jobs, an uplift of 40%. There is also forecast to be a much stronger growth in the Transport and Storage sector (from +100 to +700), pointing to a net increase in demand for B8 logistics sites. The EDNA's identification of 27.6 ha unmet need contribution from the current supply is unfounded. The calculation is at least partly based on past trends completions that do not include 'true' strategic take up from JLR, Amazon and Gestamp. The EDNA does not model the strategic employment land needs of the Functional Economic Market Area [FEMA] as a whole and then attempts to justify South Staffordshire's contribution. That is the remit of a wider strategic study.</p> <p>Effectiveness of the Local Plan could be increased with a policy required the plan to be reviewed within 12-24 months of adoption.</p>				<p>for the district's future employment needs, and the EDNA demonstrates that the objectively assessed need identified is broadly aligned with sustaining a reasonable assessment of recent past trends in delivery.</p> <p>The EDNA update builds in loss replacement and frictional vacancy reflecting substantial allowances for flexibility to ensure a robust assessment.</p> <p>The total committed losses (13,394sqm) accounted for in the EDNA Update is significantly different to average annual recorded losses over the last five years of c.2,500sqm. There is inherently uncertainty regarding how quickly the losses committed in the pipeline will be realised. It is acknowledged, contrary to the calculation based on the text at paragraph 6.10 of the EDNA Update 2024 the 12.1ha total is based on annual committed losses averaged over five years (ave. 2,679sqm per annum (compared to an average of only around 2,200sqm per annum allowed for in the EDNA 2022)).</p> <p>The 12.1ha allowance for loss replacement, based on committed losses, is considered appropriate but should be read alongside a further 13.9ha allowed based on allowing for increased frictional vacancy in supply and reflecting the stronger past take-up of supply on strategic sites and more constrained pipeline for non-strategic sites.</p> <p>It is important to note that the characteristics of sites expected to generate future losses, based on past trends and commitments, are principally non-strategic in nature. There is inherently uncertainty about the exact nature of future gross and net gains and losses impacting the existing employment land portfolio. The Plan does not make any corresponding assumptions for future windfall supply that may counter future losses over and above the allowance for loss replacement provided for through the existing pipeline. However, the Plan does contain positively prepared policies (including DS5, DS2, EC2 and EC4) to support additional opportunities for economic development within appropriate</p>



**CHAPTER 5 & POLICIES DS1-DS5: DEVELOPMENT STRATEGY AND SUPPORTING TEXT**

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							<p>circumstances.</p> <p>The Council has furthermore responded positively to the recommendations of the 2024 EDNA Update through the proposed allocation of 17.6 hectares of additional land. This broadly reflects the difference between the pipeline of sites identified in the EDNA Update and median past trends (paragraph 9.56 and Figure 21 refers) and indicates a further response to market demand (and increase in the ability to contribute towards neighbours' unmet needs) complementing the approach summarised above.</p> <p>The EDNA's adjustment for Growth Scenario key sectors based on growth rates and applying the actual impact of employment change is appropriate taking account of the fact that the district is not a self-contained FEMA and has low levels of self-containment. The Council's Growth Scenario is justified and involves the triangulation of information from three relevant econometric forecasts.</p> <p>In comparison the benchmarking of the components of the Council's Growth Scenario and pipeline in the 2024 EDNA, which for both supply and demand include the contribution of WMI that can appropriately be attributed towards needs in the district, illustrate that this remains robust and support the subsequent conclusion that this reflects a very robust rate of floorspace growth.</p> <p>While market signals indicate that as part of recent and future supply trends the district has contributed towards wider economic growth the impact is not necessarily recorded in forecasts of labour demand locally. Applying the sub-regional growth rate to actual levels of local employment is a more appropriate measure of the district's objectively assessed employment needs notwithstanding the wider contribution to market signals arising from the delivery of strategic employment floorspace.</p> <p>The representor's reference to more recent Experian forecast data including one sub-sector total for logistics lacks the triangulation of different forecasts and analysis of all sectors and</p>



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							<p>sub-regional comparisons provided by the Council's Growth Scenario. The implications of this are that the requirement for adjustment for sub-regional trends may be different and that the requirements for land and floorspace in other sectors could be lower or higher.</p> <p>It is not considered necessary to specifically commit to an early review of the plan as a review of the plan to ensure it is kept up to date is already a requirement of national guidance.</p>
North Warwickshire Borough Council	STA24-035-01	Policy DS4	<p>It is not considered that the Plan is positively prepared, justified or effective especially in light of the previous Reg 19 Publication Plan (i) 2022, and the evidence for that Plan which still exists. It does not adequately address the unmet need in relation to the housing shortfall for the Greater Birmingham and Black Country housing market area. The resulting major reduction in the housing proposed to address that unmet need within the latest Reg 19 Publication Plan, will have an impact on the level of unmet need remaining overall, increasing pressure on other adjoining authorities.</p>	Not stated	Not stated	No	<p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p>
Savills UK Ltd for Taylor Wimpey	AGT24-037-05-01	Policy DS4	<p>Our client objects to DS4 / to the level of housing growth being planned for and the Council's proposed change in their housing growth strategy.</p> <p>The only justification the Council has provided to support the change in their growth strategy is related to changes to the NPPF. Extracts from the NPPF can be found in the full representation. We acknowledge the amended wording allows for authorities to choose whether to review Green Belt boundaries but there is now no reference to reviews being based on meeting objectively assessed needs and Councils have always have to demonstrate that exceptional circumstances exist. We fundamentally disagree with SSSDC's interpretation of the policy and the use of the revised NPPF to justify the change in strategy to reduce Green Belt release and the number of homes being proposed to the GBBCHMA shortfall.</p> <p>Planning for the minimum local housing need is not aspirational and we object to the proposed strategy as it does not accord with national policy. The PPG states the standard method is the</p>	Not stated	No	No	<p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>The Council has used the standard method formula to determine our housing need and does not consider that exceptional circumstances exist to deviate from its use. The Council considers</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>starting point and therefore do not support the Council only planning to deliver homes to meet the minimum housing need. The 10% buffer comprises the proposed 640 dwelling contribution and is therefore not considered a significant buffer.</p> <p>We support the contribution to the unmet need of the GBBCHMA but object to the 640 dwelling contribution. Details on the Duty to Cooperate Topic Paper and the NPPF can be found in the full representation. It is considered that the significant reduction in meeting the shortfall is without justification and also an ineffective strategy for addressing a strategic matter.</p> <p>The 2022 Publication Plan proposed 4,000 dwellings to the unmet need and therefore SSDC does have capacity to practically deliver more than 640 dwellings. The only thing that has changed is the NPPF. We therefore do not consider that sufficient justification has been provided on how the 640 dwelling contribution has been calculated and that other land in the District is now not suitable. SSDC have previously objected to plans being produced by other GBBCHMA authorities that were proposing a minimal contribution</p> <p>The increase in contribution of employment land will create unsustainable patterns of travel as a greater number of people have to commute into the District for employment, as SSDC is failing to provide enough homes to meet the economic growth ambitions.</p>				<p>that the use of the standard method as the basis of our housing requirement is justified and an appropriate strategy.</p> <p>The 10% 'over allocation' for plan flexibility is in addition to our Local Housing Need requirement and 640 home contribution to unmet needs.</p> <p>Our EDNA 2024 considered the relationship between labour supply and employment growth and found that the strong evidence for labour demand, alongside any additional flexibility in supply, means that growth in the workplace population is likely to be proportionally high relative to the current total for persons living and working in South Staffordshire. There is presently very weak evidence that these characteristics would be changed by a specific increase in housing provision to support future jobs growth.</p>
Pland Estates Ltd	AGT24-033-01-01	Policy DS4	In light of evidenced unmet needs in the HMA, the removal of the additional 4000 dwelling contribution to unmet needs does not align with para 26 of the NPPF.	Yes	No	Yes	<p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p>
Turley Associates for Bellway Homes	AGT24-042-01-02	Policy DS4	Kinver - Please refer to our previous representations made in December 2022 on this matter at Appendix 1. The change to the housing target based on the changes to the NPPF cannot be	No	No	No	Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>relied upon as justification for not reviewing the Green Belt in South Staffordshire. Approximately 10% additional homes will be provided to “ensure plan flexibility”, this is not however reflected in the housing target, which would increase the need by 473 dwellings. It is assumed the District intend to provide for this allowance through windfall sites, however additional sites should be allocated to plan positively and to ensure sustainable locations come forward.</p>				<p>our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district’s growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan’s ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council’s Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>Ensuring plans can respond to changing circumstances is a key requirement of Local Plans and the principle of ‘over allocation’ to ensure the plan is flexible in this regard has been long established. The 10% plan flexibility is therefore in addition to the plan target of 4726 homes.</p> <p>The windfall allowance of 40 dwellings per annum is evidenced and justified in the SHELAA (2024), with a conservative approach taken to setting this allowance.</p>
Turley Associates for Bellway Homes	AGT24-042-01-04	Policy DS4	<p>Wombourne - Please refer to our previous representations made in December 2022 on this matter at Appendix 1. The change to the housing target based on the changes to the NPPF cannot be relied upon as justification for not reviewing the Green Belt in South Staffordshire. Approximately 10% additional homes will be provided to “ensure plan flexibility”, this is not however reflected in the housing target, which would increase the need by 473 dwellings. It is assumed the District intend to provide for this allowance through windfall sites, however additional sites should be allocated to plan positively and to ensure sustainable locations come forward. The site at Strathmore Crescent is available and could come forward early in the plan period to meet the additional needs of the district.</p>	No	No	No	<p>Justification for the council’s spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district’s growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan’s ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council’s Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>Ensuring plans can respond to changing circumstances is a key requirement of Local Plans and the principle of ‘over allocation’ to ensure the plan is flexible in this regard has been long established. The 10% plan flexibility is therefore in addition to the plan target of 4726 homes.</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							The windfall allowance of 40 dwellings per annum is evidenced and justified in the SHELAA (2024), with a conservative approach taken to setting this allowance.
Savills UK Ltd for Barratt Homes	AGT24-038-01-01	Policy DS4	<p>Our client objects to DS4 / to the level of housing growth being planned for and the Council's proposed change in their housing growth strategy.</p> <p>The only justification the Council has provided to support the change in their growth strategy is related to changes to the NPPF. Extracts from the NPPF can be found in the full representation. We acknowledge the amended wording allows for authorities to choose whether to review Green Belt boundaries but there is now no reference to reviews being based on meeting objectively assessed needs and Councils have always have to demonstrate that exceptional circumstances exist. We fundamentally disagree with SSDC's interpretation of the policy and the use of the revised NPPF to justify the change in strategy to reduce Green Belt release and the number of homes being proposed to the GBBCHMA shortfall.</p> <p>Planning for the minimum local housing need is not aspirational and we object to the proposed strategy as it does not accord with national policy. The PPG states the standard method is the starting point and therefore do not support the Council only planning to deliver homes to meet the minimum housing need. The 10% buffer comprises the proposed 640 dwelling contribution and is therefore not considered a significant buffer.</p> <p>We support the contribution to the unmet need of the GBBCHMA but object to the 640 dwelling contribution. Details on the Duty to Cooperate Topic Paper and the NPPF can be found in the full representation. It is considered that the significant reduction in meeting the shortfall is without justification and also an ineffective strategy for addressing a strategic matter.</p> <p>The 2022 Publication Plan proposed 4,000 dwellings to the unmet need and therefore SSDC does have capacity to practically deliver more than 640 dwellings. The only thing that has changed is the NPPF. We therefore do not consider that sufficient justification has been provided on how the 640 dwelling contribution has been calculated and that other land in the District is now not suitable. SSDC have previously objected to plans being produced by other GBBCHMA authorities that were proposing a minimal contribution.</p>	Not stated	No	No	<p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>The Council has used the standard method formula to determine our housing need and does not consider that exceptional circumstances exist to deviate from its use. The Council considers that the use of the standard method as the basis of our housing requirement is justified and an appropriate strategy.</p> <p>The 10% 'over allocation' for plan flexibility is in addition to our Local Housing Need requirement and 640 home contribution to unmet needs.</p> <p>Our EDNA 2024 considered the relationship between labour supply and employment growth and found that the strong evidence for labour demand, alongside any additional flexibility in supply, means that growth in the workplace population is likely to be proportionally high relative to the current total for persons living and working in South Staffordshire. There is presently very weak evidence that these characteristics would be changed by a specific increase in housing provision to support future jobs growth.</p>



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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			The increase in contribution of employment land will create unsustainable patterns of travel as a greater number of people have to commute into the District for employment, as SSDC is failing to provide enough homes to meet the economic growth ambitions.				
Zesta Planning for Completelink Ltd	AGT24-046-01-02	Policy DS4	<p>No specific requirement is provided for specialist housing and registered care, despite this representing a significant proportion of the overall need. Details of existing policy requirements can be found in paragraphs 2.5 - 2.15 and contains figures for completed units for extra care.</p> <p>The key evidence base is the South Staffordshire Housing Market Assessment Partial Update 2024 and the Homes for Older People and Disabled People Topic Paper April 2024. These predict a significant increase in older people in the district and that the proportion of single older persons households will increase. Table 7.2 indicates 1,198 additional units will be required up to 2041, as a mixture of sheltered/retirement and extra care/supported living units. An additional 153 Registered Care spaces are required. There is clearly an identified need for this type of accommodation.</p>	Not stated	No	Not stated	<p>The Council is allocating significant parcels of land within strategic sites for specialist housing. Policy HC4 and HC5 positively encourage the provision of specialist housing and registered care where certain criteria are met. The Council also will continue to work proactively with the County Council and Registered Providers to explore opportunities for new provision. The Council is confident that this combination of approaches will deliver sufficient levels of appropriate housing to meet the needs of older and disabled people over the plan period. Further information on this is provided in the Homes for Older and Disabled People Topic Paper (section 3).</p> <p>No change proposed.</p>
Bruton Knowles	AGT24-007-01-02	Policy DS4	<p><b>LATE SUBMISSION</b></p> <p>We object to the level of housing growth being planned for and the Council's proposed change in their housing growth strategy. The Plan seeks to reduce the amount of housing as a reflection of the new NPPF, but the new NPPF does not alter the fact that sufficient additional housing should be being planned for across the district in the most sustainable locations.</p>	Not stated	Not stated	Not stated	<p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p>
Marrons Planning for L&Q Estates	AGT24-027-03-02	Policy DS4	<p><b>Plan Period</b></p> <p>The NPPF is clear that strategic policies should look ahead over a minimum of 15 years from adoption (emphasis added)<sup>2</sup>. In order for compliance with the NPPF to be achieved, the SSLPR would need to be adopted by 2026 at the latest. Whilst that may be achievable with a fair wind, it is considered that any delays to the Submission and subsequent Examination of the SSLPR could result in the Plan falling foul of the requirements of the NPPF.</p>	Yes	No	No	<p>The Council considers that adoption by early 2026 to be ambitious by realistic. It is accepted that if this is not the case then it will impact on the end of the plan period.</p>



**CHAPTER 5 & POLICIES DS1-DS5: DEVELOPMENT STRATEGY AND SUPPORTING TEXT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			Given the NPPF requirement for strategic policies to look ahead 15 years is a minimum expectation, and the potential for a prolonged Examination, given matters such as the Duty to Cooperate which are likely to require significant consideration, the Plan period should be extended until at least 2043. An extension to the Plan period to 2043 would increase the Council's Local Housing Need derived from the Standard Method by an additional 454 dwellings, with the potential for additional contributions required towards the unmet needs of the GBBCHMA too.				
Marrons Planning for L&Q Estates	AGT24-027-03-02	Policy DS4	It is considered that the substantial unmet needs of the GBBCHMA should be addressed. The SSLPR makes a far too limited contribution to the unmet needs of the GBBCHMA, given such unmet needs are so significant and increasing. It is therefore considered the SSLPR must accommodate further growth in order to be considered positively prepared and thus sound at Examination. It is suggested that the starting point should be 4,000 dwellings, aligned with the contribution proposed in the 2022 version of the SSLPR Publication Plan and as recognised by the Black Country authorities, with an appropriate increase to take account of the significant growing unmet needs of the Black Country including specifically Wolverhampton, and substantial unmet needs arising from Birmingham.	Yes	No	No	<p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p>
Marrons Planning for L&Q Estates	AGT24-027-03-02	Policy DS4	<p>Buffer</p> <p>Draft Policy DS4 reports a buffer of approximately 10% in housing supply, providing for 5,199 dwellings in supply as set out in Table 7 against a Housing Requirement of 4,726 dwellings. However, it is considered that a 10% buffer is insufficient to afford the appropriate level of assurance and flexibility in housing supply for the Plan period. Indeed, the proposed buffer has reduced from the 2022 version of the SSLPR Publication Plan which reported a buffer of circa 13%. The Local Plans Expert Group recommended to Government in 2016 that a further allowance should be made, equivalent to 20% of the Housing Requirement. A 20% buffer would provide flexibility across housing supply to ensure local housing needs can be met even in circumstances where assumed supply does not come forward as anticipated. Consider that it is appropriate to incorporate a buffer into the Housing Requirement</p>	Yes	No	No	<p>The Council has included a buffer in housing supply above its proposed requirement which will provide around 10% plan flexibility (as set out in Policy DS4) to allow for any uncertainties around site delivery. It has worked proactively with site promoters and infrastructure providers on its two strategic allocations (Policies SA1-2) to masterplan the sites and create greater certainty over site delivery. The vast majority of sites in the plan are unconstrained greenfield sites and the Council has a very strong track record of delivering major schemes, with only two full applications lapsing over a period of 27 years (1996-2023) as detailed further on our Housing Monitoring and Five-Year Land Supply 2022-2023 document. Given the mix of sites proposed in the plan, the Council therefore consider the 10% plan flexibility to be appropriate.</p> <p>It should be noted that the 2022 Regulation 19 plan included a significantly larger site of circa 2000 dwellings and a further site of 1200</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							dwellings which justified a larger plan flexibility.
Marrons Planning for L&Q Estates	AGT24-027-03-02	Policy DS4	<p>Draft Policy DS4 identifies that a significant proportion of the identified housing supply is made up of commitments, i.e. sites with planning permission.</p> <p>We note in the supporting Housing Site Selection Topic Paper (2024) that a significant number of sites with planning permission that have not yet commenced are included in the housing supply, without any account taken of the potential for such planning permissions to lapse if unimplemented. It is considered that a minimum 10% lapse rate should be applied to commitments not started, to ensure the supply is robust.</p>	Yes	No	No	<p>The figures apply a non-implementation rate of 19% on small sites with permission (which have not yet commenced) but not on large sites as evidenced by the SHLAA. The Council also discount long standing starts (sites which have commenced but stalled / activity has not taken place for a period of time).</p> <p>No change proposed.</p>
Marrons Planning for L&Q Estates	AGT24-027-03-02	Policy DS4	<p><b>Windfall Allowance</b> Draft Policy DS4 seeks to incorporate a windfall allowance of 600 dwellings on small sites in the housing supply. This has been carried forward from the 2022 version of the SSLPR Publication Plan, but at an increased proportion of the total housing supply identified; up to 11.5% from 5.8%.</p> <p>We have concerns with the inclusion of any windfall allowance in South Staffordshire. Whilst recent windfall delivery rates may have strong, given the emerging Local Plan Review only seeks to maintain existing policy mechanisms for windfall development, rather than expand the scope for windfall delivery, the ability for windfall delivery rates to persist is queried.</p> <p>There is considered to be significantly limited opportunities for windfall development in the District. This is particularly noteworthy in the context of substantial Green Belt coverage in South Staffordshire, tightly drawn Development Boundaries. Consider the windfall allowance should be removed from the housing supply in draft Policy DS4.</p>	Yes	No	No	<p>The windfall allowance of 40 dwellings per annum is evidenced and justified in the SHELAA (2024), with a conservative approach taken to setting this allowance.</p> <p>No change proposed.</p>
Marrons Planning for L&Q Estates	AGT24-027-03-02	Policy DS4	Identify a significant shortfall in supply (5,649 dwelling supply shortfall) set out in their Table 1. This should be rectified through the allocation of additional sites, including Land off Bridgnorth Road, Wightwick.	Yes	No	No	<p>The Council's strategy sees the Council meet its own needs and make a 640-home contribution to unmet needs of the wider GBBCHMA. There is not a shortfall originating from South Staffordshire.</p> <p>No change proposed.</p>
Marrons Planning for Boningale Homes	AGT24-027-02-01	Policy DS4	The Plan is not capable of being found sound, subject to Modification. This is only achievable through the full assessment and reconsideration of sites and settlements across the District, including our clients' land interests set out within this submission.	No	No	No	<p>The Council considers the plans strategy to be appropriate</p> <p>No change proposed.</p>

**CHAPTER 5 & POLICIES DS1-DS5: DEVELOPMENT STRATEGY AND SUPPORTING TEXT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
Marrons Planning for Boningale Homes	AGT24-027-02-01	Policy DS4	<p>Disagree with the Council's calculation of the local housing need using the standard method and additionally consider that there is substantial evidence to support an uplift to the minimum standard method housing and is considered to be between 364 to 441 dwellings per annum.</p> <p>There will be about 101,000 dwellings worth of unmet needs over a 22-year period beyond what is provided by current and emerging Local Plans in the corresponding local authority regions.</p> <p>It is not thought that South Staffordshire Council's proposed commitment of 640 homes would adequately address unmet need. The minimum contribution that should be taken into consideration is the 4,000 houses that were originally suggested and included in the November 2022 Draft Plan for South Staffordshire.</p> <p>More details are provided in a detailed Housing Need Assessment report, found at Appendix 1 of the submission.</p>	No	No	No	<p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>The Council has used the standard method formula to determine our housing need and does not consider that exceptional circumstances exist to deviate from its use. The Council considers that the use of the standard method as the basis of our housing requirement is justified and an appropriate strategy.</p>
CPRE West Midlands Regional Group	STA24-014-03	Policy DS4	<p>CPRE commissioned housing study identified a need of 4,086 and a supply of 6,378 indicating an over-supply of 2,292 dwellings. The unmet need housing figure in the conurbation is also the subject of considerable uncertainty. South Staffordshire should therefore review its housing figures and reassess the requirement for strategic sites and green belt allocations. We question if there are 'exceptional circumstances' for the release of Green Belt land.</p>	Not stated	Not stated	Not stated	<p>The supply of 6378 dwellings is not recognised. The case for Exceptional Circumstances for releasing Green Belt at the districts most sustainable Tier 1 settlements is set out in our Green Belt Exceptional Circumstances Topic Paper 2024.</p> <p>No change proposed.</p>
Pegasus Group for Richborough Estates	AGT24-030-05-02	Policy DS4	<p>Details of housing figures, contribution to the HMA and NPPF/PPG extracts can be found in paragraphs 4.26 – 4.36. The Plan provides a buffer of 10%, this has been reduced from 13% in the 2022 Publication Plan. In view of the 2024 Publication Plan reducing housing supply rather than reducing the buffer, it ought to be increasing it as there will be less supply overall and a proportionally greater impact if sites do not come forward. Richborough objects to DS4 as it is not justified based on proportionate evidence nor positively prepared in line with national policy. The minimum housing requirement figure across the Plan period should be substantially greater than that currently proposed.</p>	Yes	No	Yes	<p>The Council has included a buffer in housing supply above its proposed requirement which will provide around 10% plan flexibility (as set out in Policy DS4) to allow for any uncertainties around site delivery. It has worked proactively with site promoters and infrastructure providers on its two strategic allocations (Policies SA1-2) to masterplan the sites and create greater certainty over site delivery. The vast majority of sites in the plan are unconstrained greenfield sites and the Council has a very strong track record of delivering major schemes, with only two full applications lapsing over a period of 27 years (1996-2023) as detailed further on our Housing Monitoring and Five-Year Land Supply 2022-2023</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							document. Given the mix of sites proposed in the plan, the Council therefore consider the 10% plan flexibility to be appropriate.
Pegasus Group for Richborough Estates	AGT24-030-05-02	Policy DS4	DS4 sets out that delivery of new development will be monitored. If the LP is not to allocate additional land to contribute to meeting the overwhelming shortfall, it is imperative that further work in accordance with DtC, along with an early review of the LP, is undertaken. The extent of the unmet housing need clearly requires cooperation of adjoining authorities such as South Staffordshire to contribute a substantial, albeit appropriate, quantum of housing land.	Yes	No	Yes	The Council is committed to participating in an update to the 2018 Strategic Growth Study across the GBBCHMA authorities, and this work is currently being progressed.  It is not considered necessary to specifically commit to an early review of the plan as a review of the plan to ensure it is kept up to date is already a requirement of national guidance.
Pegasus Group for Clowes Developments	AGT24-031-02-01	Policy DS4	Details of housing figures, contribution to the HMA and NPPF/PPG extracts can be found in paragraphs 5.36 – 5.46 of the residential representation. The Plan provides a buffer of 10%, this has been reduced from 13% in the 2022 Publication Plan. In view of the 2024 Publication Plan reducing housing supply rather than reducing the buffer, it ought to be increasing it as there will be less supply overall and a proportionally greater impact if sites do not come forward. Clowes objects to DS4 as it is not justified based on proportionate evidence nor positively prepared in line with national policy. The minimum housing requirement figure across the Plan period should be substantially greater than that currently proposed.	Not stated	No	No	The Council has included a buffer in housing supply above its proposed requirement which will provide around 10% plan flexibility (as set out in Policy DS4) to allow for any uncertainties around site delivery. It has worked proactively with site promoters and infrastructure providers on its two strategic allocations (Policies SA1-2) to masterplan the sites and create greater certainty over site delivery. The vast majority of sites in the plan are unconstrained greenfield sites and the Council has a very strong track record of delivering major schemes, with only two full applications lapsing over a period of 27 years (1996-2023) as detailed further on our Housing Monitoring and Five-Year Land Supply 2022-2023 document. Given the mix of sites proposed in the plan, the Council therefore consider the 10% plan flexibility to be appropriate.
Pegasus Group for Clowes Developments	AGT24-031-02-01	Policy DS4	DS4 sets out that delivery of new development will be monitored. If the LP is not to allocate additional land to contribute to meeting the overwhelming shortfall, it is imperative that further work in accordance with DtC, along with an early review of the LP, is undertaken. The extent of the unmet housing need clearly requires cooperation of adjoining authorities such as South Staffordshire to contribute a substantial, albeit appropriate, quantum of housing land.	Not stated	No	No	The Council is committed to participating in an update to the 2018 Strategic Growth Study across the GBBCHMA authorities, and this work is currently being progressed.  It is not considered necessary to specifically commit to an early review of the plan as a review of the plan to ensure it is kept up to date is already a requirement of national guidance.
Pegasus Group for Clowes Developments	AGT24-031-02-02	Policy DS4	The employment figure set out in DS4 is not sound and the amount of land which needs to be found for development needs to be increased significantly. The policy should be amended by removal of references to contributions from WMI (which would otherwise be regarded as windfalls if they do meet the requirements for local businesses), this would mean the amount of land to meet local needs should be increased by 18.8	No	No	No	The Council's 2022 Economic Development Needs Assessment (EDNA) and 2024 EDNA update are considered robust assessments and the 62.4ha and 107.45 figures are deemed reliable. The EDNA does consider both labour demand and past trends when arriving at a robust objectively assessed need figure for the district.



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			hectares. Land to the north of Wall Heath should be allocated for 80 hectares of mixed employment, which will give a total of 192.05 hectares to be allocated. Clowes considers that DS4 with regards to employment provision should align with the NPPF.				A proportion of WMI can be attributed to South Staffordshire alongside other authorities in the sites market area as supported by our EDNA 2022 and supporting evidence through the DCO application.
Pegasus Group for Miller Homes	AGT24-031-03-02	Policy DS4	<p>If the Local Plan is adopted in 2026 this would leave the minimum 15-year period to 2041. There cannot be any delays during examination, however there is a real risk of delay (Government amendments to national policy, planning reform etc). To safeguard against these delays and ensure adoption stays on track for 2026, we consider that additional housing allocations should be identified now.</p> <p>The standard method has been used for calculating local housing needs and is the minimum starting point for delivery. This is not justified, considering the reasonable alternatives, and based on proportionate evidence. We consider there are exceptional circumstances which justify an alternative approach to assessing housing needs. The district already has very significant gross commuting flows, and we consider the local housing need figure will exacerbate these flows.</p>	Not stated	No	No	<p>The Council considers that adoption by early 2026 to be ambitious by realistic. It is accepted that if this is not the case then it will impact on the end of the plan period.</p> <p>The Council has used the standard method formula to determine our housing need and does not consider that exceptional circumstances exist to deviate from its use. The Council considers that the use of the standard method as the basis of our housing requirement is justified and an appropriate strategy.</p>
Pegasus Group for Miller Homes	AGT24-031-03-02	Policy DS4	The updates to the NPPF do not nullify the previous position that a 4000-home contribution was required for soundness. The Council are still justifiably relying on this as an exceptional circumstance for Green Belt release (albeit to the Tier 1 settlements). A reduction in the contribution largely defers the issue of addressing unmet needs to other authorities in the GBBCHMA who are not as advanced in plan-making. A higher contribution would be a positive approach, justified, and more effective in addressing the cross-boundary issue of unmet need.	Not stated	No	No	Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth. The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).
Pegasus Group for Miller Homes	AGT24-031-03-02	Policy DS4	The policy should have a clear requirement within it to ensure the Council undertake regular annual monitoring of housing delivery and set out what actions will be taken if housing delivery is slow to progress or drops below five-year supply, which in our view should trigger a full review of the Local Plan. The development needs beyond the Plan period are not accounted for in the Publication Plan. For soundness, we consider that the Council need to identify longer-term development needs and identify areas of safeguarded land.	Not stated	No	No	<p>It is not considered necessary to specifically commit to an early review of the plan as a review of the plan to ensure it is kept up to date is already a requirement of national guidance.</p> <p>The Council considers that it would be inappropriate to release additional land from the Green Belt for safeguarded land through this Local Plan, given the need for any such release to</p>



**CHAPTER 5 & POLICIES DS1-DS5: DEVELOPMENT STRATEGY AND SUPPORTING TEXT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							<p>be justified by exceptional circumstances.</p> <p>It is acknowledged that the approach to future Green Belt release will be considered through an updated Strategic Growth Study across the GBBCHMA which South Staffordshire will be an active partner in, and it is right to consider this issue strategically across this wider functional geography. To date, no GBBCHMA authority has requested that South Staffordshire provide additional safeguarded land for longer term unmet needs, nor has this been required in recent examinations in the GBBCHMA. Given these factors and the requirement in national policy to review the plan in whole or in part every 5 years, it is not considered appropriate or necessary to release safeguarded land at this stage.</p>
Pegasus Group for St Philips	AGT24-032-07-02	Policy DS4	<p>Details of housing figures, contribution to the HMA and NPPF/PPG extracts can be found in paragraphs 4.21 – 4.28. The most recent SHMA fails to consider the impact of committed development at the HS2 West Midlands Interchange which is projected to create around 8,500 new jobs and 8,100 indirect jobs off-site. The EDNA outlines that the approved WMI has the potential to deliver 1,560 jobs. St Philips would like to see further clarity in relation to these figures. The Plan should go further in providing additional homes to address the significant and growing housing need across the wider GBBCHMA.</p>	Yes	No	Not stated	<p>Reference to WMI creating 8,500 jobs and 8,100 indirect jobs reflects the total job creation estimated. Reference to the 1,560 jobs are those expected to be filled by the resident workforce in South Staffordshire.</p> <p>Justification for the council’s spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district’s growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan’s ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council’s Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p>
Pegasus Group for St Philips	AGT24-032-07-02	Policy DS4	<p>The Plan provides a buffer of 10%, this has been reduced from 13% in the 2022 Publication Plan. In view of the 2024 Publication Plan reducing housing supply rather than reducing the buffer, it ought to be increasing it as there will be less supply overall and a proportionally greater impact if sites do not come forward. DS4 is not justified as it is not based on proportionate evidence nor positively prepared in line with national policy. The</p>	Yes	No	Not stated	<p>The Council has included a buffer in housing supply above its proposed requirement which will provide around 10% plan flexibility (as set out in Policy DS4) to allow for any uncertainties around site delivery. It has worked proactively with site promoters and infrastructure providers on its two strategic allocations (Policies SA1-2) to masterplan the sites and create greater certainty</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			minimum housing requirement figure across the Plan period should be substantially greater than that currently proposed.				over site delivery. The vast majority of sites in the plan are unconstrained greenfield sites and the Council has a very strong track record of delivering major schemes, with only two full applications lapsing over a period of 27 years (1996-2023) as detailed further on our Housing Monitoring and Five-Year Land Supply 2022-2023 document. Given the mix of sites proposed in the plan, the Council therefore consider the 10% plan flexibility to be appropriate.
Pegasus Group for St Philips	AGT24-032-07-02	Policy DS4	DS4 sets out that delivery of new development will be monitored. If the LP is not to allocate additional land to contribute to meeting the overwhelming shortfall, it is imperative that further work in accordance with DtC, along with an early review of the LP, is undertaken. The extent of the unmet housing need clearly requires cooperation of adjoining authorities such as South Staffordshire to contribute a substantial, albeit appropriate, quantum of housing land.	Yes	No	Not stated	The Council is committed to participating in an update to the 2018 Strategic Growth Study across the GBBCHMA authorities, and this work is currently being progressed.  It is not considered necessary to specifically commit to an early review of the plan as a review of the plan to ensure it is kept up to date is already a requirement of national guidance.
Pegasus Group for Persimmon Homes	AGT24-032-04-01	Policy DS4	The Council have allocated the minimum figure of housing required by the standard method – Persimmon Homes raises concerns regarding potential insufficient housing to meet the housing needs. The PPG makes it clear that the figure produced by the standard method is a minimum figure, rather than a requirement. Whilst it is acknowledged that the district continue to contribute towards the HMA, the district should go further in providing additional homes to address the significant growing need across the GBBCHMA. In light of the extended Plan period, consideration must be given to expected population growth and the additional shortfall of housing across the GBBCHMA.  The Plan provides a buffer of 10%, this has been reduced from 13% in the 2022 Publication Plan. In view of the 2024 Publication Plan reducing housing supply rather than reducing the buffer, it ought to be increasing it as there will be less supply overall and a proportionally greater impact if sites do not come forward.	Not stated	No	Not stated	The Council has used the standard method formula to determine our housing need and does not consider that exceptional circumstances exist to deviate from its use. The Council considers that the use of the standard method as the basis of our housing requirement is justified and an appropriate strategy.  The Council has included a buffer in housing supply above its proposed requirement which will provide around 10% plan flexibility (as set out in Policy DS4) to allow for any uncertainties around site delivery. It has worked proactively with site promoters and infrastructure providers on its two strategic allocations (Policies SA1-2) to masterplan the sites and create greater certainty over site delivery. The vast majority of sites in the plan are unconstrained greenfield sites and the Council has a very strong track record of delivering major schemes, with only two full applications lapsing over a period of 27 years (1996-2023) as detailed further on our Housing Monitoring and Five-Year Land Supply 2022-2023 document. Given the mix of sites proposed in the plan, the Council therefore consider the 10% plan flexibility to be appropriate.
Pegasus Group for Taylor Wimpey	AGT24-032-08-	Policy DS4	The Council have allocated the minimum figure of housing required by the standard method – Taylor Wimpey objects to	Not stated	No	Not stated	The Council has used the standard method formula to determine our housing need and does

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
	02		<p>this position as it is insufficient to meet the district’s housing needs. In light of the extended Plan period, consideration must be given to expected population growth and the additional shortfall of housing across the GBBCHMA. Housing provision should be considered in excess of the standard method. (Details of HMA shortfall and housing figures are in paragraphs 4.7 – 4.11 of the full representation).</p> <p>The Plan provides a buffer of 10%, this has been reduced from 13% in the 2022 Publication Plan. In view of the 2024 Publication Plan reducing housing supply rather than reducing the buffer, it ought to be increasing it as there will be less supply overall and a proportionally greater impact if sites do not come forward.</p>				<p>not consider that exceptional circumstances exist to deviate from its use. The Council considers that the use of the standard method as the basis of our housing requirement is justified and an appropriate strategy.</p> <p>The Council has included a buffer in housing supply above its proposed requirement which will provide around 10% plan flexibility (as set out in Policy DS4) to allow for any uncertainties around site delivery. It has worked proactively with site promoters and infrastructure providers on its two strategic allocations (Policies SA1-2) to masterplan the sites and create greater certainty over site delivery. The vast majority of sites in the plan are unconstrained greenfield sites and the Council has a very strong track record of delivering major schemes, with only two full applications lapsing over a period of 27 years (1996-2023) as detailed further on our Housing Monitoring and Five-Year Land Supply 2022-2023 document. Given the mix of sites proposed in the plan, the Council therefore consider the 10% plan flexibility to be appropriate.</p>
Lichfields for St Philips	AGT24-026-02-01	Policy DS4	<p>Broadly, St Philips supports the Council’s approach to assessing its minimum LHN. St Philips welcomes the fact that the Council has reflected on the critical concerns raised in response to the previous Publication Plan in respect of omitting completions from the housing requirement. However, the NPPF and PPG are clear that the figure generated is a minimum and it is not clear whether the Council has considered –</p> <p>A) An affordable housing need uplift would be required to account for the in-migrating households from the Black Country and Birmingham</p> <p>B) The Council’s current approach seeks to promote unsustainable patterns of commuting. The Council has not adequately addressed whether there would be a sufficient supply of housing to meet the employment needs identified.</p> <p>The Council should prepare a further SHMA or Topic Paper which considers whether affordable housing or economic uplifts should be applied to the LHN figure.</p>	No	No	No	<p>The Council has used the standard method formula to determine our housing need and does not consider that exceptional circumstances exist to deviate from its use. The Council considers that the use of the standard method as the basis of our housing requirement is justified and an appropriate strategy.</p> <p>Our EDNA 2024 considered the relationship between labour supply and employment growth and found that the strong evidence for labour demand, alongside any additional flexibility in supply, means that growth in the workplace population is likely to be proportionally high relative to the current total for persons living and working in South Staffordshire. There is presently very weak evidence that these characteristics would be changed by a specific increase in housing provision to support future jobs growth.</p>
Lichfields for St Philips	AGT24-026-02-01	Policy DS4	<p>Buffer – It is critical that the Local Plan’s housing trajectory has sufficient land supply across the plan period. St Philips fundamentally supports the principle of the Council’s approach of ensuring a sufficient headroom is built into the supply and</p>	No	No	No	<p>The Council has included a buffer in housing supply above its proposed requirement which will provide around 10% plan flexibility (as set out in Policy DS4) to allow for any uncertainties around site delivery. It has worked proactively with site</p>

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**CHAPTER 5 & POLICIES DS1-DS5: DEVELOPMENT STRATEGY AND SUPPORTING TEXT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			applying the buffer to both its housing need and the contribution to the unmet need of the Black Country. However, St Philips has concerns regarding the reduction in buffer from 13% to 10%. The proposed 10% buffer is well below the range identified by other Councils and found sound at the examination. St Philips recommends that a minimum of circa 20% headroom should be incorporated into the Local Plan.				promoters and infrastructure providers on its two strategic allocations (Policies SA1-2) to masterplan the sites and create greater certainty over site delivery. The vast majority of sites in the plan are unconstrained greenfield sites and the Council has a very strong track record of delivering major schemes, with only two full applications lapsing over a period of 27 years (1996-2023) as detailed further on our Housing Monitoring and Five-Year Land Supply 2022-2023 document. Given the mix of sites proposed in the plan, the Council therefore consider the 10% plan flexibility to be appropriate.
Lichfields for Taylor Wimpey	AGT24-026-03-02	Policy DS4	Taylor Wimpey considers that the Council's approach to calculating its minimum LHN figure is broadly correct and welcomes that the Council has updated the LHN figure since the 2022 PP. Notwithstanding the above, Taylor Wimpey would like to highlight the LHN figure is a minimum starting point and considers that the SHMA update and 2024 PP have not sufficiently considered whether an uplift to the minimum LHN figure is required. The NPPF recognises that there is an implicit link between housing need and economic growth, and they should not be decoupled from each other. Taylor Wimpey would encourage the Council to produce a Topic Paper or update to the SHMA which addresses whether an uplift to the minimum LHN figure should be applied.	Not stated	No	Not stated	The Council has used the standard method formula to determine our housing need and does not consider that exceptional circumstances exist to deviate from its use. The Council considers that the use of the standard method as the basis of our housing requirement is justified and an appropriate strategy.  Our EDNA 2024 considered the relationship between labour supply and employment growth and found that the strong evidence for labour demand, alongside any additional flexibility in supply, means that growth in the workplace population is likely to be proportionally high relative to the current total for persons living and working in South Staffordshire. There is presently very weak evidence that these characteristics would be changed by a specific increase in housing provision to support future jobs growth.
Lichfields for Taylor Wimpey	AGT24-026-03-02	Policy DS4	Buffer - It is critical that the Local Plan's housing trajectory has sufficient land supply across the plan period. Taylor Wimpey supports the principle of the Council's approach of ensuring a sufficient headroom is built into the supply and applying the buffer to both its housing need and the contribution to the unmet need of the Black Country. However, Taylor Wimpey has concerns regarding the reduction in buffer from 13% to 10%. The proposed 10% buffer is well below the range identified by other Councils and found sound at the examination. Taylor Wimpey recommends that a minimum of circa 20% headroom should be incorporated into the Local Plan.	Not stated	No	Not stated	The Council has included a buffer in housing supply above its proposed requirement which will provide around 10% plan flexibility (as set out in Policy DS4) to allow for any uncertainties around site delivery. It has worked proactively with site promoters and infrastructure providers on its two strategic allocations (Policies SA1-2) to masterplan the sites and create greater certainty over site delivery. The vast majority of sites in the plan are unconstrained greenfield sites and the Council has a very strong track record of delivering major schemes, with only two full applications lapsing over a period of 27 years (1996-2023) as detailed further on our Housing Monitoring and Five-Year Land Supply 2022-2023 document. Given the mix of sites proposed in the



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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							plan, the Council therefore consider the 10% plan flexibility to be appropriate.
Lichfields for Taylor Wimpey	AGT24-026-03-02	Policy DS4	Local Plan Review policy – Taylor Wimpey considers that the Council’s current position fails to provide any certainty of an outcome or clearly defined timescale. The Council should introduce an additional Local Plan policy which requires the plan to be reviewed within two years of adoption.	Not stated	No	Not stated	It is not considered necessary to specifically commit to an early review of the plan as a review of the plan to ensure it is kept up to date is already a requirement of national guidance.
Home Builders Federation	STA24-024-02	Policy DS4	<p>HBF are concerned that this second Regulation 19 consultation is a significant rowing back from the amount of housing that was being planned for in South Staffordshire under the previous Reg 18 and Reg 19 consultations. The failure to address the full housing needs of the area, and to make a greater contribution to the wider needs of the region when previous evidence supported such an approach, means that the plan is not proactively planning for development and would therefore fail the tests of soundness. In our view the housing requirement for South Staffordshire should be higher and additional housing allocations are needed.</p> <p>HBF request that the Plan is amended to reflect a higher housing requirement for South Staffordshire which will enable a greater contribution to be made to meeting the wider housing needs of the HMA. This figure should then be included in criteria a of the policy.</p>	No	No	No	<p>Justification for the council’s spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district’s growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan’s ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council’s Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p>
Solihull Metropolitan Borough Council	STA24-041-01	Policy DS4	<p>SMBC notes that this iteration of the plan includes a significantly different housing requirement than that included in the R19 version of the plan published in November 2022. It recognises that, at least in part, this is driven by SSDC seeking to use the greater flexibilities in the December 2023 NPPF in its approach to release of Green Belt land to accommodate needs.</p> <p>SMBC is seeking to adopt a similar approach in its emerging local plan, which is currently at examination, and it believes there are parallels in the circumstances which justify such an approach, for both authorities.</p>	Not stated	Not stated	Not stated	Comments noted.
Hughes, K	RES24-114-03	Policy DS4	Support this plan. It clearly shows how the next 5 year housing supply will be met including a significant contribution to Birmingham and the Black Country housing market area unmet housing needs.	Not stated	Not stated	Not stated	Comments noted.
<b>Policy DS5: Spatial Strategy to 2041</b>							
Pegasus Group for Taylor Wimpey	AGT24-030-08-02	Policy DS5	Windfall development comprises 600 homes. Historic windfall delivery rates have been based on historic permissions to achieve a capacity of 35dph. These developments were based on	Not stated	No	Not stated	The windfall allowance of 40 dwellings per annum is evidenced and justified in the SHELAA (2024), with a conservative approach taken to setting



**CHAPTER 5 & POLICIES DS1-DS5: DEVELOPMENT STRATEGY AND SUPPORTING TEXT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			less onerous policy provisions which did not require the delivery of 10% BNG, NDSS or M4(2)/M4(3) compliant homes. The strategy also fails to address affordability concerns, stating that affordable housing could be reduced to below 30% if viability is an issue. (Details of HMA shortfall and housing figures are in paragraphs 4.7 – 4.11 of the full representation).				<p>this allowance. Proposals coming forward against the current plan already need to deliver homes to NDSS and M4(2) standards and recently 10% Biodiversity Net Gain.</p> <p>Affordable housing is set at 30% on allocations as supported by the SHMA. The PPG is clear that where up-to-date policies have set out the contributions expected from development, planning applications that fully comply with them should be assumed to be viable. Viability should be considered at plan-making stage and should only be revisited at application stage should the applicant clearly demonstrate particular circumstances to justify it. This position is reflected in Policy HC3.</p>
Pegasus Group for Richborough Estates	AGT24-030-05-02	Policy DS5	SSDC's preferred spatial strategy, Option I, focuses growth to sustainable non-Green Belt locations alongside limited Green Belt allocations in Tier 1 settlements. The Plan relies upon the delivery of over a third of the district's housing on the large strategic allocations. Larger sites will typically have longer lead in times, which is reflected in the Indicative Housing Trajectory with completions falling significantly short of local housing need in the period through to 2028. There also appears to be an under delivery of 84 units across the two strategic sites.	Yes	No	Yes	<p>The Council has included a buffer in housing supply above its proposed requirement which will provide around 10% plan flexibility (as set out in Policy DS4) to allow for any uncertainties around site delivery. It has worked proactively with site promoters and infrastructure providers on its two strategic allocations (Policies SA1-2) to masterplan the sites and create greater certainty over site delivery. The vast majority of sites in the plan are unconstrained greenfield sites and the Council has a very strong track record of delivering major schemes, with only two full applications lapsing over a period of 27 years (1996-2023) as detailed further on our Housing Monitoring and Five-Year Land Supply 2022-2023 document. Given the mix of sites proposed in the plan, the Council therefore consider the 10% plan flexibility to be appropriate.</p> <p>The Council is confident that it will be able to demonstrate a 5-year housing land supply on adoption of the plan, as required by national policy.</p>
Pegasus Group for Richborough Estates	AGT24-030-05-02	Policy DS5	The role the district plays in the wider GBBCHMA and FEMA must be emphasised further within the wording of DS5. Spatial Strategy Option I currently fails to reflect the district's relationship with the adjoining areas of Dudley and Wolverhampton. It should place greater emphasis on housing growth along the eastern edge of the district. It is acknowledged in the evidence base that Tier 2 and 3 settlements can also accommodate housing growth, whilst this may require the	Yes	No	Yes	<p>The purpose of Policy DS5 is to set out the spatial strategy for distributing growth (as set out in Policy DS4) within South Staffordshire. It is therefore not considered necessary to refer to wider geographies within this policy.</p> <p>The Council considers that the distribution of development strikes the right balance by focusing the majority of development at the most</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			release of Green Belt land, carefully considered layouts can enhance setting through appropriate compensatory measures. It is important that over reliance on brownfield sites does not result in an overprovision of development unable to meet a range of needs.				sustainable Tier 1 settlements, whilst still directing a suitable level of growth to the less sustainable Tier 2 and 3 villages.
Pegasus Group for Richborough Estates	AGT24-030-05-02	Policy DS5	Windfall development comprises 600 homes. Historic windfall delivery rates have been based on historic permissions to achieve a capacity of 35dph. These developments were based on less onerous policy provisions which did not require the delivery of 10% BNG, NDSS or M4(2)/M4(3) compliant homes. The strategy also fails to address affordability concerns, stating that affordable housing could be reduced to below 30% if viability is an issue.	Yes	No	Yes	The windfall allowance of 40 dwellings per annum is evidenced and justified in the SHELAA (2024), with a conservative approach taken to setting this allowance. Proposals coming forward against the current plan already need to deliver homes to NDSS and M4(2) standards and recently 10% Biodiversity Net Gain.  Affordable housing is set at 30% on allocations as supported by the SHMA. The PPG is clear that where up-to-date policies have set out the contributions expected from development, planning applications that fully comply with them should be assumed to be viable. Viability should be considered at plan-making stage and should only be revisited at application stage should the applicant clearly demonstrate particular circumstances to justify it. This position is reflected in Policy HC3.
Pegasus Group for Richborough Estates	AGT24-030-05-02	Policy DS5	DS5 is currently considered unsound and is not justified based on proportionate evidence nor positively prepared. It is considered that additional housing allocations capable of accommodating housing needs in sustainable locations accessible to public transport should be delivered.	Yes	No	Yes	Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.  The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).
Murphy, F	RES24-158-01	Policy DS5	I oppose housing planning in the lower Penn area	Not stated	Not stated	Not stated	Comments noted.
Taylor, R	RES24-234-01	Policy DS5	- Support the need to protect The Green Belt. - Development should always be focused in the sustainable locations that have been already identified, providing good infrastructure; reliable transport links and be serviced by	Yes	Yes	Yes	Comments noted.

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>adequate nearby facilities.</p> <ul style="list-style-type: none"> <li>- Agree that The Climate Change Strategy should be part of the strategic planning responsibilities. I agree that the Local Plan should protect the natural environment by only encouraging and promoting sustainable patterns of development.</li> <li>- Agree that the Council should follow NPPF, placing climate change and reducing its impact when making decisions on sustainable development, now and in the future.</li> <li>- Agree that by focusing development in the larger villages which should have greater access to facilities and public transport, this should reduce car dependency improve mobility without increasing road traffic conditions.</li> <li>- To protect The Green Belt I agree that it is important that the Council should ensure the Local Plan reflects the changes reflected in the NPPF (Revised December 2023).</li> <li>- I agree that Tier 1 villages are assessed as having the greatest access to services and facilities relative to other settlements, with Tier 4/5 settlements the lowest.</li> <li>- Lawnswood and Friars Gorse sites are not villages or settlements. They are Green Belt, which borders the Black Country/West Midlands. They have no facilities, infrastructure, or public transport links and are totally unsuitable for development.</li> <li>- Agree that the district should plan for its own objectively assessed needs for housing and other development, as well as contributing to the needs of neighbouring areas, as long as that does not result in Green Belt release.</li> <li>- Agree that The Council should allocate suitable Brownfield sites first and foremost and should also ensure neighbouring authorities do the same.</li> </ul>				
Pennick, C	RES24-173-01	Policy DS5	<p>Support the South Staffordshire Local Plan as I believe that it gives the best access to affordable, accessible housing supported by suitable infrastructure whilst, importantly, only releasing a tiny percentage of Greenbelt land for development. Keen to protect our natural surrounding and am pleased that the plan positively considers the environmental impact of any new development. Strongly opposed to development on greenfield sites when there are more suitable brownfield sites both within our county and beyond and believe that the plan would give a clear direction through until 2041.</p>	Yes	Yes	Yes	Comments noted.
Wright, C	RES24-260-01	Policy DS5	<p>We support the protection of the green belt. Any development should be in the sustainable locations that have been identified, with good infrastructure and public transport links and nearby facilities.</p>	Yes	Yes	Yes	Comments noted.
Readshaw, R	RES24-192-01	Policy DS5	<p>Agree that the local plan is one way to encourage sustainable patterns of development, promote carbon resilient design and protect the natural environment.</p>	Yes	Yes	Yes	Comments noted.

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>Agree that the Council follows the revised NPPF (December 2023).By a policy of favouring sustainable development as a priority this would impact climate change, mitigating its effects</p> <p>Agree that the changes in national policy as in the revised NPPF (December 2023) should be reflected by the council in updating the local plan especially to reflect the protection of the Green Belt. This would preserve green spaces for future generations and help to mitigate climate change.</p> <p>Agree that larger villages (tier 1) are assessed as having greater access to services and public transport.</p> <p>Agree the District should plan firstly for its own properly assessed need for housing and other developments and contribute to the needs of neighbouring areas</p> <p>Development of Brownfield sites should be a priority when considering applications for planning permission and should encourage neighbouring authorities to follow suit.</p>				
Pennick, J	RES24-174-01	Policy DS5	<p>I would like to record my support for the draft plan in that I think it gives a sound basis to provide well-thought-out options for new and affordable housing for first-time buyers like myself. I am keen to find my own home in the county where I currently live and work and agree that the considered expansion onto Tier 1 villages where there are appropriate amenities for people such as myself is most appropriate. I currently live in a Tier 4 village but feel that major expansion in areas such as Bishop's Wood would not be beneficial because I believe that the surrounding greenbelt land should be protected. Large expansion would also put undue pressure on already stretched infrastructure in these smaller areas</p>	Yes	Yes	Yes	Support noted.
Pennick, S	RES24-175-01	Policy DS5	<p>The Local Plan outlines a clear strategy for controlled, sustainable and appropriate development across South Staffordshire, avoiding use of greenbelt land where possible and thereby protecting the rural nature of smaller Tier 4 villages which have limited infrastructure and facilities. It also gives strict criteria which would support rejection of any speculative development proposals outside of this plan. Therefore, I am keen to express my strong support for the Draft Plan</p>	Yes	Yes	Yes	Support noted.
Mulvihill, R	RES24-157-01	Policy DS5	<p>Support the protection of greenbelt, any development should be in the sustainable locations that have been identified, with good infrastructure and public transport links and nearby facilities. With regards to the climate change strategy. The Local plan should encourage sustainable patterns of development, promote carbon resilient design and protect the natural environment, not destroy it.</p> <p>Agree that the council should update the local plan in line with the revised NPPF (Dec 2023) to reflect changes to national policy, most notably to reflect the protection of the greenbelt. It is important to preserve green spaces for future generations and</p>	Not stated	Not stated	Not stated	Comments noted.

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>to mitigate climate change.</p> <p>Agree that tier 1 villages are assessed as having the greatest access to services and facilities relative to other settlements, with Tier 4 settlements the lowest. Tier 5 villages have no access to services and facilities and are therefore unsuitable for development.</p> <p>Agree that the district should plan for its own objectively assessed needs for housing and other development, as well as contributing to the needs of neighbouring areas as long as that does not result in Green Belt release.</p> <p>Agree that the council should allocate suitable brownfield sites first and foremost and also push back to neighbouring authorities to do the same.</p>				
Ritson, J	RES24-196-01	Policy DS5	I am in support of South Staffordshire Council in its designation of villages suitable for housing on the basis of a) their location b) their existing infrastructure c) existing facilities and d) transport links	Yes	Yes	Yes	Support noted.
Morgans, A	RES24-155-01	Policy DS5	<p>Support the protection of the Green Belt, especially in relation to the Lawnswood and Friars Gorse sites. Any development should be in the sustainable locations that have been identified, with good infrastructure and public transport links and nearby facilities.</p> <p>Agree that Tier 1 villages are assessed as having the greatest access to services and facilities relative to other settlements, with Tier 4/5 settlements the lowest.</p> <p>Agree that the council should allocate suitable Brownfield sites first and foremost and should also ensure neighbouring authorities to do the same.</p>	Yes	Yes	Yes	Support noted.
Ritson, D	RES24-195-01	Policy DS5	I am in support of South Staffordshire Council in its designation of villages suitable for housing on the basis of a) their location b) their existing infrastructure c) existing facilities and d) transport links	Yes	Yes	Yes	Support noted.
Garratt, T	RES24-079-01	Policy DS5	<p>The Green Belt must be preserved without question. Under no circumstances should a developer be given approval to build on Green Belt land.</p> <p>Only if strong independent and verified evidence proves that a sufficiently large number of additional homes are needed in this area, then a process to build a new New Town (similar to Telford) should be considered.</p>	Not stated	Not stated	Not stated	Comments noted.
Bull, S	RES24-029-01	Policy DS5	<p>I welcome and support this revised Local Plan, especially with the recognition and the importance it places in protecting the Green Belt, especially in Lower Penn.</p> <p>Although the houses to be built are at least 10% higher than predicted housing needs, they are of a proportionate scale for a district that is 80% Green Belt.</p> <p>Brownfield sites should be prioritised for development.</p>	Yes	Yes	Yes	Support noted.



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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			To reduce car dependency all sites should be in places with sufficient infrastructure capacity and public transport links, especially bus routes, and nearby facilities which are able to cater for new residents. Support that the Langley Road (site 582) is no longer included in the Local Plan and that no other site in Lower Penn have been added.				
Garner, J	RES24-078-01	Policy DS5	Support the local plan as it has strong protection of the greenbelt around Bishops Wood. It prevents urban sprawl, supports bio-diversity and maintains environmental quality.	Yes	Yes	Yes	Support noted.
Garner, D	RES24-077-01	Policy DS5	As a resident of Bishops Wood I support the local plan. The protection of the greenbelt is vitally important in maintaining the environmental quality and ecosystem to which we all depend on.	Yes	Yes	Yes	Support noted.
Cresswell, J	RES24-048-01	Policy DS5	I support the protection of the Greenbelt. Any development should be in the sustainable locations that have been identified with good infrastructure and public transport links and nearby facilities.	Not stated	Not stated	Not stated	Support noted.
Draper, G	RES24-060-01	Policy DS5	Object to any proposed development of the Lawnswood and Friars Gorse sites. These sites provide vital greenspace for the residents of Wordsley, without which we would be consumed by the growing urban sprawl of the West Midlands.  Agree that the Council should update the local plan in line with the revised NPPF (December 2023) to reflect changes to national policy, most notably to reflect the protection of the Green Belt.	Not stated	Not stated	Not stated	Comments noted.
Brampton, J	RES24-021-01	Policy DS5	Support distribution of development to most sustainable locations, protecting the Green Belt.	Yes	Yes	Yes	Support noted.
Inchley, D	RES24-117-01	Policy DS5	Support distribution of development to most sustainable locations, protecting the Green Belt.	Yes	Yes	Yes	Support noted.
Harris-Tighe, J	RES24-099-01	Policy DS5	Support distribution of development to most sustainable locations, protecting the Green Belt.	Yes	Yes	Yes	Support noted.
Edwards, R	RES24-062-01	Policy DS5	Support for the protection of the Green Belt in Wordsley. The access to wildlife locally is appreciated and has resulted in a welcoming community.	Not stated	Not stated	Not stated	Support noted.
Takhar, B	RES24-229-01	Policy DS5	Support distribution of development to most sustainable locations, protecting the Green Belt. Support the Council's allocation of suitable brownfield sites first and ensure neighbouring Council's do the same.	Yes	Yes	Yes	Support noted.
Ward, P	RES24-245-01	Policy DS5	Support distribution of development to most sustainable locations, protecting the Green Belt.	Yes	Yes	Yes	Support noted.
Page, T	RES24-165-01	Policy DS5	Support distribution of development to most sustainable locations, protecting the Green Belt.	Yes	Yes	Yes	Support noted.

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
Kneller, Mr & Mrs	RES24-129-01	Policy DS5	Support distribution of development to most sustainable locations, protecting the Green Belt.	Yes	Yes	Yes	Support noted.
Carter, M	RES24-034-01	Policy DS5	Support. Development should be in the most sustainable locations.	Not stated	Not stated	Not stated	Support noted.
Hale, T	RES24-094-01	Policy DS5	Object to any proposed development of the Lawnswood and Friars Gorse sites. These sites provide vital greenspace for the residents of Wordsley, without which we would be consumed by the growing urban sprawl of the West Midlands.  Agree that the Council should update the local plan in line with the revised NPPF (December 2023) to reflect changes to national policy, most notably to reflect the protection of the greenbelt.	Not stated	Not stated	Not stated	Comments noted.
Sayce, P	RES24-204-01	Policy DS5	Support for the removal of Linthouse Lane site from the Local Plan.	Not stated	Not stated	Not stated	Support noted.
Siviter, R	RES24-216-01	Policy DS5	Need to maintain the Green Belt around Lawnswood and Kingswinford, and further development would be more sustainable on brownfield sites to avoid problems with facilities and roads, and to maintain areas for wildlife and woodlands. Infrastructure and public transport links should be a main factor in any growth. Experienced problems on the road network, flooding in gardens and busy schools and health facilities in the area.	Yes	Yes	Yes	Support noted.
Smith, K	RES24-219-01	Policy DS5	Support distribution of development to most sustainable locations, protecting the Green Belt.	Not stated	Not stated	Not stated	Support noted.
Smith, K	RES24-219-01	Policy DS5	Tier 5 villages, including Lower Penn, have no access to services and are therefore unsuitable for development.	Not stated	Not stated	Not stated	Comments noted.
McEwen, S	RES24-148-01	Policy DS5	Support distribution of development to most sustainable locations, protecting the Green Belt.	Not stated	Not stated	Not stated	Support noted.
Harris, T	RES24-097-01	Policy DS5	Building on Green Belt raises significant environmental and infrastructure concerns. Impact on biodiversity, loss of agricultural land, lack of infrastructure.	Not stated	Not stated	Not stated	Support noted.
Moore, S	RES24-153-01	Policy DS5	Support distribution of development to most sustainable locations, protecting the Green Belt.	Yes	Yes	Yes	Support noted.
Jordan, G	RES24-127-01	Policy DS5	Development should be in sustainable locations that have been identified where there is good infrastructure along with public transport links and nearby facilities using Brownfield sites first.	Yes	Yes	Yes	Comments noted.
Chapman, J	RES24-040-01	Policy DS5	Development should be in sustainable locations which have been identified with good infrastructure and public transport links to nearby facilities.	Yes	Yes	Yes	Comments noted.
PlanIT Planning & Development for Hampton Oak	AGT24-034-02-05	Policy DS5	Additional development should be directed towards the sustainable settlements, including the tier 1, 2 and 3 villages in order to ensure that the housing is directed towards sustainable	Yes	No	Yes	Comments noted.

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**CHAPTER 5 & POLICIES DS1-DS5: DEVELOPMENT STRATEGY AND SUPPORTING TEXT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
Developments Ltd			locations to supporting existing services and facilities.				
Everett, D	RES24-065-01	Policy DS5	Development should be in sustainable locations with good infrastructure and public transport links and nearby facilities. Support growth being focussed in larger villages and needs to be supported with improved infrastructure. Council should allocate suitable brownfield sites first.	Not stated	Not stated	Not stated	Comments noted.
Hill, S.M	RES24-106-01	Policy DS5	Development should be situated in sustainable locations with good infrastructure and public transport links.	Not stated	Not stated	Not stated	Comments noted.
Jordan, B.D	RES24-126-01	Policy DS5	Development should be situated in sustainable locations with good infrastructure and not latch onto adjoining areas which are congested and have stretched resources.	Yes	Yes	Yes	Comments noted.
Dingley, P & D	RES24-056-01	Policy DS5	No comments made.	Yes	Yes	Yes	Support noted.
Isherwood, J	RES24-118-01	Policy DS5	Support distribution of development to most sustainable locations, protecting the Green Belt.	Yes	Yes	Yes	Support noted.
Peplow, D	RES24-177-01	Policy DS5	Support distribution of development to most sustainable locations, protecting the Green Belt.	Yes	Yes	Yes	Support noted.
Tomlinson, D	RES24-240-01	Policy DS5	LATE SUBMISSION I support the protection of the Green Belt, any development should be in the sustainable locations that have been identified with good infrastructure and public transport links and nearby facilities.	Not stated	Not stated	Not stated	Comments noted.
Tobin, K	RES24-237-01	Policy DS5	Support the revised approach to the Green Belt in the current Publication Plan. Green Belt should not be released to help contribute to the needs of neighbouring areas. Brownfield sites should be the first priority for development. Any development should be in the more sustainable locations that have been identified. To reduce car dependency, they should be in places with good infrastructure and good public transport links, including bus routes, and with nearby facilities which have the capacity to cater to new residents. Otherwise, infrastructure must be improved to cater for this before development takes place. Support that Green Belt site at Langley Road (site 582) is no longer included in plans for development.	Yes	Yes	Yes	Comments noted.
Lapley, Stretton and Wheaton Aston Parish Council	STA24-026-01	Policy DS5	The plan has been formulated in accordance with the government requirements and local plan framework. It is consistent with national policy, positively prepared by formulating a strategy that aims to meet infrastructure.	Yes	Yes	Yes	Support noted.
Wombourne Parish Council	STA24-052-01	Policy DS5	Altered planning strategy is much more clearly justifiable and is supported. However, we also continue to believe the distribution of new dwellings should be shared between Tier 5 villages in South Staffordshire because, as it stands, Tier 5 villages remain	Not stated	Yes	Not stated	Comments noted. It is not considered that directing development to Tier 5 settlements would increase their sustainability as there are no existing facilities to sustain. Instead, it would

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			untouched which only entrenches their unsustainability as places. Where we previously commented that we believed the Local Plan had been 'negatively prepared' because of the huge opposition from local residents to the planned sites and lack of reference to this volume to the Inspector, we now withdraw this comment but reserve judgement in relation to infrastructure planning and provision. We do, on balance, accept this revised Local Plan proposal as 'sound'.				lead to more unsustainable transport movements.
Wood, M (Conservative candidate for Kingswinford and South Staffordshire)	STA24-053-01	Policy DS5	<p>Strongly support the decision not to choose Ridgehill Woods and Lawnswood as sites for future development. Also, the removal of sites in Wombourne (land north of Bridgnorth Road and Beggars Bush Lane) and Lower Penn (Langley Road) from previous draft plan.</p> <p>There will of course still be some requirement for additional housing to meet local population needs, but clearly as much as possible this needs to be built on existing brownfield sites. That said, I do recognise that, as 80% of South Staffordshire is greenbelt, inevitably a small portion of this will have to be released.</p> <p>Sites identified at Codsall and Bilbrook are amongst the least harmful options available, but we need to ensure that any development minimises the impact on the local community, transport and public services. The scale and nature of development needs to be consistent with villages.</p>	Not stated	Not stated	Not stated	Comments noted.
Dudley Metropolitan Borough Council	STA24-015-03	Policy DS5	Consider the policy to be sound and support the spatial strategy and distribution of growth outlined in the policy. Support reference to a 'minimum' of 4,726 dwellings being delivered. Dudley MBC particularly supports the identification of the district's freestanding strategic employment sites and their safeguarding for employment use.	Yes	Yes	Yes	Support noted.
Kinver Parish Council	STA24-025-02	Policy DS5	The build-out of site 274 will put additional strain on services and cause a substantial increase in car travel meaning the site is not sustainable. Lack of practical public transport means Kinver is an unsustainable location for growth. Doctors surgery is already close to capacity and the sport and recreation facilities are limited with the sport centre having limited opening hours. Windfall developments in Kinver is substantial compared to the district average - consider that the method for arriving at housing need in the plan undervalues windfall developments. Support a creative approach to specialist housing provision. We welcome the emphasis on use of brownfield sites, and would welcome further clarification of the approach to redevelopment and repurposing of redundant buildings and brownfield sites outside the settlement boundary, which may be over washed by greenbelt but provide potentially useful sites.	Not stated	Not stated	Not stated	Kinver has been identified as a Tier 2 settlement in the Rural Services and Facilities Audit 2021 reflecting the services available including retail, primary and secondary schools and a doctor's surgery. The level of development proposed for Kinver is therefore considered proportionate and appropriate. The windfall allowance of 40 dwellings per annum is evidenced and justified in the SHELAA (2024), with a conservative approach taken to setting this allowance. The Council considers that this strikes the correct balance considering that windfall developments by their nature are unknown.

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
Walsall Council	STA24-049-01	Policy DS5	<p>Strategy is largely as proposed in letter dated 24 October 2023. NPPF paragraph 35 still stands and that plans are 'sound' if they are positively prepared and meet, as a minimum, the area's objectively assessed needs and the unmet need from neighbouring areas is accommodated where it is practical to do so. Note the wording in paragraph 145 of the December 2023 NPPF. However, national planning policy should be viewed as a whole. The proposal to reduce the number of homes proposed to contribute to meeting the needs of neighbouring authorities from 4,000 to 600 does not align well with the test of soundness requiring plans to be positively prepared.</p> <p>Birmingham and the Black Country do not have capacity to accommodate housing or employment land needs. South Staffordshire have taken an active role in the preparation of evidence which supports this. The December 2023 NPPF revision does not alter this need or the supply shortfall. The draft SoCG acknowledges significant shortfalls in housing arising from the Black Country and therefore Walsall remain to be convinced how it can then be concluded that "SSDC no longer considers that all of the previous proposed Green Belt sites are justified by exceptional circumstances". The need for changes to Green Belt boundaries should be established by the evidence of housing need at the strategic level, and there has been no demonstrable change in the evidence to justify exceptional circumstances that might support detailed amendments to boundaries in relation to individual sites.</p>	Not stated	Not stated	Not stated	<p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>The preferred strategy does not propose to completely avoid Green Belt release, despite national policy allowing for such an approach and indicating any Green Belt release is solely the choice of the council. The Council therefore believes that the plans strategy is positively prepared as it meets our own housing need and a proportion of unmet needs from neighbouring authorities in a way that is consistent with achieving sustainable development by focusing green belt release on our most sustainable Tier 1 settlements, consistent with national policy requirement to give first consideration to land which is well served by public transport, and therefore representing an appropriate strategy.</p>
Cheslyn Hay Parish Council	STA24-011-01	Policy DS5	<p>Dispute Cheslyn Hay's designation as a Tier 1 Village due to the lack of infrastructure and local services in the Parish. Housing should be fairly distributed across all the villages in South Staffordshire.</p> <p>Contrary to Policy EC8, parking in Cheslyn Hay is inadequate. There is a lack of services and facilities including lack of bus services contrary to Policy EC12. Contrary to Policy EC11, the drainage and sewerage system is not fit for purpose. Contrary to policy EC12, Cheslyn Hay Parish could not sustain major developments without serious investment in the road infrastructure and therefore request a link road to relieve traffic congestion in the village is delivered through Section 106 funding.</p>	Not stated	No	Not stated	<p>Justification for the Council's identification of Cheslyn Hay/Great Wyrley as a Tier 1 settlement is set out in our Rural Services and Facilities Audit (2021). Cheslyn Hay/Great Wyrley has the lowest level of growth of all Tier 1 settlements; however, this reflects the capacity of suitable sites identified through the Housing Site Assessment Topic Paper (2024)</p> <p>The necessary infrastructure improvements, including measures in the Council's Infrastructure Delivery Plan (2024), will be delivered where they meet the planning obligation tests in NPPF paragraph 57.</p>
Sandwell Council	STA24-038-01	Policy DS5	<p>LATE SUBMISSION Consider that the SSLP has been prepared in a manner which is</p>	Yes	No	Yes	<p>Comment noted. The Council has a signed Statement of Common Ground with Sandwell</p>



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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			legally compliant and meets the Duty to Cooperate. However, the SSLP will not be considered sound (in terms of being positively prepared and effective) unless and until SoCG are agreed with relevant parties.				Council.
Goldfinch Town Planning Services	AGT24-020-01-01	Policy DS5	<p>Too much Green Belt land still risks being lost to development within the South Staffordshire District. As a result, the proposed Publication Stage Report (April 2024) is failing the 'Sustainability' test of Soundness as set out in paragraph 35 of the Revised NPPF (December 2023). The Local Planning Authority is therefore taking forward an insufficiently robust and unsound Local Plan Review forward, in direct conflict with the tests of 'Soundness'</p> <p>The plan is not based on the most up-to-date and robust housing evidence, as it has failed to effectively respond to and shape into Local Plan-preparation the substantial shift in central government housing policy.</p> <p>The emerging Local Plan Review is failing to respond effectively to guidance in paragraphs 16 given its substantial failure to provide 'deliverable' and 'effective' planning policy solutions on a wide range of policy matters. Including wildlife corridor protection, improving climate change resilience, biodiversity protection, economic recovery and new jobs growth, preventing further levels of economic retail decline within the districts various centres.</p> <p>The WMI proposals combined with the delivery of 4,086 new homes across the district over the Plan period will further increase and intensity localised air pollution problems within a part of the district, which is already suffering from very poor air quality problems. Due to the close proximity of the M6 motorway network. Concerns in relation to the "in-combination" effects of air pollution from the West Midlands Freight Interchange (WMI) and the resultant traffic congestion of HGV lorry movements to and from the WMI site. Combined with proposals to deliver of 4,086 new homes within the South Staffordshire District, and the subsequent severe traffic congestion implications on already heavily congested highway networks, which cannot cope with this scale of new traffic growth. This results in the Council to failing to protect local air quality and its legal duty under Article 2 of the Human Rights Act</p>	No	No	No	<p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>The Council considers its evidence base to be proportionate as required by national policy.</p> <p>The impact of WMI in terms of air quality and traffic impact has already been considered through the Development Consent Order process.</p>
Brewood Civic Society	STA24-008-04	Policy DS5	Brewood Civic Society supports the South Staffordshire Council Local Plan 2023-2041. We believe it has legal compliance, has soundness and is compliant with the duty to co-operate.	Yes	Yes	Yes	Support noted.

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Sibley, G	RES24-211-01	Policy DS5	Support the Local Plan and protection of the Green Belt.	Not stated	Not stated	Not stated	Support noted.
Graceson, M	RES24-086-01	Policy DS5	Pleased with level of green belt protection Acknowledges the need to develop greater reductions re: Climate Change Hopes for a sensible approach to renewable developments	Yes	Yes	Yes	Support noted.
Chaggar, C	RES24-039-01	Policy DS5	Supports the plan as strongly protects green belt around Bishops Wood. Focus on biodiversity is vital to the ecological health of the area. Plan is consistent with national policies.	Yes	Yes	Yes	Support noted.
Brown, S	RES24-024-01	Policy DS5	Strongly supports as protects green belt around Bishops Wood. The focus on biodiversity supports ecological health benefiting our communities environment and quality of life and mental health of residents. Appreciates and supports the plans commitment to involving the community in planning decisions.	Yes	Yes	Yes	Support noted.
Brown, S	RES24-025-01	Policy DS5	Supports the local plan as it strives to protect our rural spaces and makes good use of existing community services balancing the need for housing. Safeguards the greenbelt for future generations.	Yes	Yes	Yes	Support noted.
Birmingham City Council	STA24-004-01	Policy DS5	<p>LATE SUBMISSION</p> <p>In the previous Publication version of the South Staffs Local Plan (November 2022), the document set out a Policy (DS6) for the long-term aspirations of the Council to explore potential options within the district for a sustainable independent new settlement to accommodate some of its future housing and economic needs. It was recognised that such a settlement would not provide housing for the current plan period but would form an option for the Council to explore in future plan-making. Again, it is disappointing that this has now been removed from the new version of the Publication document given that the potential for such a settlement could be part of a long-term sustainable solution to alleviate development pressures on the western side of the West Midlands conurbation.</p> <p>Birmingham City Council welcomes and supports the contribution made by land allocations in South Staffs which contribute towards housing and employment land shortfalls being experienced in the West Midlands conurbation, particularly Birmingham and the Black Country. The high levels of potential unmet housing and employment land needs being experienced across the conurbation, (currently estimated to be approximately 110,000 dwellings and around 388 hectares of employment land just for Wolverhampton, Birmingham, Dudley and Sandwell combined), is considered in our view, as an exceptional circumstance to justify taking sites out of the Green Belt. To that extent, South Staffs have also taken this view in releasing sites from the Green Belt in contributing 640 dwellings to the wider</p>	Not stated	Not stated	Not stated	<p>The council has considered locations/sites for a new settlement through its Sustainability Appraisal and Housing Site Assessment Topic Paper 2024 and was unable to identify any suitable locations for a new settlement along the A449 corridor that were demonstrably deliverable in the plan period. A previous version of the plan had identified an area of search for a new settlement to be delivered beyond the plan period, however after considering representations the Council no longer considers this to be necessary or appropriate for this plan to set locational requirements for sites that would come through a future plan. It is not appropriate to prejudge the direction of future Local Plan as this issue should be revisited again once preparation of the next plan commences.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth. The housing target (incorporating the 640-home</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>GBBCHMA as well as significant releases for employment land.</p> <p>We are disappointed that the levels of housing contributions have been significantly reduced from the 4,000 dwellings previously proposed. The significant reduction in housing numbers means that such opportunities will, either have to be exported to other parts of the HMA (possibly further away from where the housing need is derived) or lost altogether. It is also disappointing that references to exploring the possibility of a new settlement have also been removed due to the importance of finding long term solutions to land distribution and shortfalls across the West Midlands and its surrounding local planning authorities. This is why it is important that the 14 local authorities that comprise the HMA, continue to work together and build on the considerable work already undertaken, to identify possible solutions to any housing and employment land shortfalls across the HMA area and ensure that all plans have been positively prepared in accordance with the Duty to Cooperate.</p>				<p>contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>The Council are committed to working with HMA authorities to prepare an up-to-date strategic growth study to ensure there is up to date evidence of housing market area shortfalls and potential growth locations</p>
Duncan, R & S (Cllrs)	STA24-016-01	Policy DS5	<p>The housing development, of both large and small proposals, must now focus on the South of our District, where land of all descriptions is more bountiful. It is totally unreasonable to continue to put the strain on an already overpopulated, and under resourced area, with a poor road and rail infrastructure (although this continues to be a selling point for all development in this area), and with a lack of local shopping amenities as is the situation in Cheslyn Hay and Great Wyrley, when considering the current population and to the extent it will grow to.</p> <p>I appreciate housing allocations are always justified in Tier 1 settlements on the grounds that they have more public amenities, access to transport networks etc. Our Schools and GP practices are overloaded as with other such enterprises, to breaking point with no real human thought and consideration, apparently being given.</p>	Yes	No	No	<p>The Rural Services and Facilities Audit 2021 has looked at the factors highlighted (access to public transport, schools, health facilities etc) in determining Cheslyn Hay/Great Wyrley as Tier 1 settlements, with the distribution of growth throughout the district weighted towards these more sustainable settlements. The Council considers this approach to be appropriate.</p> <p>Engagement throughout plan preparation has taken place with Staffordshire and Stoke on Trent Integrated Care Board and School Organisation Team at Staffordshire County Council. Neither organisation has indicated that the impact of the proposed allocation is incapable of being mitigated through financial contributions on health and education facilities respectively, in line with Policies HC14 and HC15.</p>
Savills UK Ltd for St Modwen & JM Holt	AGT24-038-04-08	Policy DS5	<p>In order to be effective and justified, we consider the further flexibility within the Plan is required to ensure that it is capable of adapting to increased demand for employment land within the District and the FEMA.</p> <p>It is requested that the following additional text be included in Policy DS5, following the section relating to 'free standing strategic employment sites':</p> <p>"Other Employment Locations Where evidence indicates an immediate need or demand for</p>	Yes	No	No	<p>The plan already makes provision to meet our own employment land needs as well as a contribution to unmet needs of the wider Functional Economic Market Area (FEMA).</p> <p>Should the position change in terms of need and demand then this will inform the need to review the Local Plan.</p> <p>No change proposed.</p>

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			additional employment land (B1, B2 and B8) that cannot be met from land allocated in this plan, the Council will consider favourably proposals that meet the identified need in appropriate locations outside of the district's settlements and freestanding strategic employment sites. Such development should be delivered in accordance with the requirements of other policies within the local plan."				
Diplock, M	RES24-059-01	Policy DS5	Supports the protection of green belt in and around Bishops Wood. Growth is limited to suitable and deliverable non green belt land. Natural environment will be protected in line with gov'ts national planning policy Demonstrates willingness to involve local communities in planning decisions. Enhances and protects biodiversity in Bishops Wood.	Yes	Yes	Yes	Comments noted.
Buckler, M	RES24-028-01	Policy DS5	Supports local plan because of its protection for green belt and rural communities. Protection of biodiversity and its benefits for all. Commitment to community involvement in planning decisions. Engagement of residents in caring for their environment.	Yes	Yes	Yes	Support noted.
Cooper, B	RES24-044-01	Policy DS5	Supports the local plan as it helps to protect our green spaces. Happy with the engagement and the Councils commitment to hear our wishes.	Yes	Yes	Yes	Support noted.
Davies, J	RES24-052-01	Policy DS5	We find this plan unsound.	No	No	No	Comments noted.
Diplock, A	RES24-058-01	Policy DS5	Supports the protection of greenbelt in and around Bishops Wood. Strategy put forward is justified - importance of retaining rural character and protecting natural environment. Clear evidence of co-operation and agreement with neighbours. Willingness to involve local communities in planning decisions. Maintenance of rich bio-diversity in Bishops Wood. Biodiversity is essential tor environmental sustainability and is in line with the policies in the framework.	Yes	Yes	Yes	Support noted.
Diplock, A	RES24-057-01	Policy DS5	Supports the protection of greenbelt in and around Bishops Wood. Strategy put forward is justified - importance of retaining rural character and protecting natural environment. Clear evidence of co-operation and agreement with neighbours. Willingness to involve local communities in planning decisions. Maintenance of rich bio-diversity in Bishops Wood. Biodiversity is essential tor environmental sustainability and is in line with the policies in the framework.	Yes	Yes	Yes	Support noted.
Marrons Planning for Bloor Homes	AGT24-027-01-02	Policy DS5	The Plan is not sound as it inconsistent with national policy and not justified based on the supporting evidence. The settlement hierarchy should be revised to differentiate Wombourne from other Tier 2 settlements. Wombourne should play a greater role in housing provision in order to meet its own local housing needs, and there are clear exceptional circumstances to further	Yes	No	Yes	It is acknowledged that settlements within the same tier will have varying levels of services and facilities and that Wombourne has a good level of services comparable to other Tier 2 settlements. However, the use of access to employment (utilising the Hansen scores) as factor in

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			<p>amend Green Belt boundaries.</p> <p>In the Rural Services and Facilities Audit (2021) which informed the settlement hierarchy, the weighting for access to employment is too high with too much weight on rail provision. Whilst there is no railway in Wombourne, there are regular and frequent bus services to neighbouring towns. The RSFA also doesn't recognise the availability of employment opportunities in Wombourne itself or that more people are choosing to work from home. In determining the settlement hierarchy, consideration has not been given to the relative size of the settlement and in turn the housing needs that it is likely to generate on its own. The Plan is therefore unsound as it is not positively prepared. Wombourne residents have strong commuting links with the HMA hasn't been reflected.</p> <p>In respect of Wombourne, it is located within the Southern Sub Area as prescribed by the Council's SHMA, within which a need of 1,291 dwellings is identified over the Plan period. By way of comparison, an analysis of the planned housing supply as identified in the Plan totals only 410 dwellings within the Southern Sub Area. At present, there therefore exists an unmet need within the Southern sub area of approximately 881 dwellings over the Plan period. There is also an area of a high affordability ratio with demand very high, as reflected in the Council's 2021 viability study. This is evidence of the attractiveness of this area as a location for further housing to meet existing and future housing need.</p> <p>Part of the rationale for the Council's Spatial Strategy approach relies on the most recent revisions to the NPPF. Yet, in essence the approach taken in the NPPF remains unchanged, i.e. that there is no requirement to alter Green Belt boundaries but if it is proposed it must be fully justified. We consider that the substantial unmet needs arising from the GBBCHMA represent exceptional circumstances for Green Belt boundary amendments.</p>				<p>determining the tiers of villages is considered appropriate given that commuting is one of the main reasons for travel and lying within a tier 1 village gives residents direct access to Birmingham, the region's main employment (and retail/leisure) centre via a sustainable transport mode.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p>
Avison Young for Crest Nicholson	AGT24-004-02-03	Policy DS5	<p>The approach of locating development in the most sustainable locations is consistent with national policy. The allocation of land for the delivery of housing in Kinver is clearly sound and would contribute towards meeting identified housing needs in a sustainable location.</p> <p>Notwithstanding the above, the wording of the final sentence of Policy DS5 is inconsistent with Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) and Paragraph 11 of the NPPF (i.e. the presumption in favour of sustainable development) and should be deleted.</p>	Yes	Yes	Not stated	<p><b>Comments noted.</b></p> <p><b>Minor modification 003:</b></p> <p><b>Delete final sentence of Policy DS5.</b></p>



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Stafford Borough Council	STA24-043-01	Policy DS5	<p>Stafford Borough considers that the approach of meeting the current local housing need of 4,726 new homes including a contribution towards the unmet needs of the GBBCHMA is the most appropriate strategy within the national policy framework at this time, noting the West Midlands Green Belt covering much of South Staffordshire District and the need to minimise infrastructure implications for neighbouring areas. Furthermore, it is considered that the Publication version of the Local Plan is appropriate in terms of addressing the employment land provision.</p> <p>With regards the delivery of new housing locations, the Borough Council supports an appropriate balance focused across Tiers 1 to 3 based on access to services and facilities together with an emphasis on maximising the use of brownfield land. This will ensure future sustainable development by utilising existing and new infrastructure provision.</p>	Yes	No	Yes	Support noted.
Acres Land and Planning for Hallam Land Management	AGT24-001-01-01	Policy DS5	<p>Objection to the policy as unsound on grounds of lack of a 'positively prepared' Local Plan and conflict with national policy within NPPF. The Council has introduced a shift in its Spatial Strategy which does not arise out of a change in either housing or employment needs but simply an 'opportunistic' decision arising out of a political choice. This demonstrates that the Local Plan is not 'positively prepared' nor 'properly justified'.</p> <p>We would argue that neither a pure 'infrastructure-led' approach still less a 'capacity-led' approach is entirely suitable in forming the basis for a 'positively prepared' planning strategy which genuinely caters for peoples' and business's needs in the District. Instead, a 'demands-led and/or a 'needs led' approach is more appropriate.</p>	Not stated	No	Not stated	<p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p>
Cerda for Trine Developments	AGT24-011-01-01	Policy DS5	<p>Paragraphs 144 and 145 of the NPPF quoted in regards to the revised spatial strategy for South Staffordshire. Policy DS5 quoted in regards to Tier Settlements. The move between spatial options G to I results in very little change in the overall performance in the SA and therefore the difference is neutral.</p>	Yes	No	Yes	Comments noted.
Gladman Developments Ltd	AGT24-019-01-01	Policy DS5	<p>Gladman broadly supports the spatial strategy to 2041 as detailed through Policy DS5. The strategy expressly recognises that directing an element of growth adjacent to the southern edge of Stafford can facilitate sustainable growth at a non-Green Belt location.</p> <p>Nonetheless, national policy is clear that all reasonable non-Green Belt options should first be considered for meeting</p>	Not stated	No	No	<p>Th Council has examined fully other reasonable options in order to justify Green Belt release in line with NPPF para 146.</p> <p>The wider land parcel at site 036c was considered but discounted for the reasons set out in the Housing Site Assessment Topic Paper 2024.</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			identified needs for development. Gladman is of the view that the Council have not fulfilled this requirement of national policy. The larger site 036c Land at Weeping Cross represents one of if not the only remaining opportunity to deliver development in a non-Green Belt location in the authority, at a highly sustainable location on the edge of a main settlement. The potential for development here should be maximised and the larger site 036c allocated.				No change proposed.
Avison Young for Beard, G	AGT24-004-01-02	Policy DS5	<p>Plan is proposing a strategy that is not entirely appropriate. This is evidenced by: the fact that the revised strategy is considered to prioritise avoiding Green Belt release at the expense of meeting the true housing requirement; 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. The strategy will not, therefore, deliver a sustainable pattern of development in accordance with the provisions of the NPPF.</p> <p>The Council's decision not to include any allocations at tier 2 settlements, disproportionately distributes development within the District. The development strategy must be adjusted to generate a pattern of development that is genuinely sustainable, including allocating additional sites in sustainable locations such as land at the Bradshaws Estate and reducing the over reliance upon tier 1 settlements.</p>	No	No	No	<p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The Council considers that the plan includes a good mix of different site sizes as proposed allocations with allocations spread across Tier 1-3 villages, with the quantum of development for each proportionate to their relative sustainability.</p> <p>No change proposed.</p>
Advance Land & Planning for Seabridge Developments	AGT24-002-02-01	Policy DS5	<p>Generally support the text in paragraph 5.14 confirming the spatial approach as Spatial Option I.</p> <p>Great Wyrley and Cheslyn Hay are Tier 1 settlements that independently and jointly offer a wide range of community services and facilities, in a highly accessible location. They represent a logical and sustainable location for housing growth. Support the settlement hierarchy approach and spatial strategy in Policy DS5.</p> <p>Factors other than walking distance of railway stations should be taken into account and suggest that accessibility to employment opportunities and more particularly the proximity to schools and other community services are just as important when assessing "sustainability".</p>	Not stated	Not stated	Not stated	Comments noted. Access to school and employment has been considered as part of the Rural Services and Facilities Audit 2021 informing the Tier that villages fall within.
Advance Land & Planning for Stephens, M	AGT24-002-03-01	Policy DS5	<p>Generally support the text in paragraph 5.14 confirming the spatial approach as Spatial Option I.</p> <p>Great Wyrley and Cheslyn Hay are Tier 1 settlements that independently and jointly offer a wide range of community services and facilities, in a highly accessible location. They represent a logical and sustainable location for housing growth.</p>	Not stated	Not stated	Not stated	<p>Comments noted. Access to school and employment has been considered as part of the Rural Services and Facilities Audit 2021 informing the Tier that villages fall within.</p> <p>Suitable sites (including Green Belt sites) have been maximised in Great Wyrley/Cheslyn Hay.</p>

**CHAPTER 5 & POLICIES DS1-DS5: DEVELOPMENT STRATEGY AND SUPPORTING TEXT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>Support the settlement hierarchy approach and spatial strategy in Policy DS5.</p> <p>Factors other than walking distance of railway stations should be taken into account and suggest that accessibility to employment opportunities and more particularly the proximity to schools and other community services are just as important when assessing "sustainability".</p> <p>Object to the proposal to only allow to what is tantamount to limited further growth at Cheslyn Hay / Great Wyrley beyond the existing allocated / safeguarded land, equating to just 11.3% of the total proportion of housing delivery, as compared with almost 25% in other Tier 1 settlements. Suggest there is scope to allocate additional land adjacent to the proposed allocation Site 119a.</p>				With reasonable alternative sites discounted for reasons set out in the Housing Site Assessment Topic Paper 2024. This bottom up (capacity led) approach has determined the level of growth for these villages.
Lichfields for St Philips	AGT24-026-02-01	Policy DS5	Details on the 2022 and 2024 Publication Plan Spatial Strategy can be found in the full representation (paragraphs 2.2 – 2.7). St Philips is generally supportive of the Council's approach whereby growth is distributed to the Borough's most sustainable settlements and consider the spatial strategy appropriate.	Not stated	No	Not stated	Comments noted.
Blower, M	RES24-019-02	Policy DS5	Plan is unsound and not viable for existing community. Penkridge has turned from a village to a small town and has increased by the West Midlands Interchange going ahead. Two large housing estates are due to be built, without any additional infrastructure. The village is already overcrowded.	Not stated	No	Not stated	Growth in Penkridge reflects its relative sustainability in comparison to other settlements, owing to its Tier 1 status. Development will be required to mitigate its impact on existing infrastructure such as highways, and schools in line with policies in the Local Plan.
RPS Group for Persimmon Homes	AGT24-037-02-05	Policy DS5	<p>RPS contends that the Council has, through its evidence base, sought to underscore the potential for Featherstone to support higher levels of growth as a basis for limiting any further development opportunities in the SSLP.</p> <p>The level of growth is most influenced by the Rural Services and Facilities Audit that has used Hansen scores to assess access to employment. The analysis has identified two 'employment sites' in close proximity to Featherstone, when four should have been identified (Hilton Main, Hilton Cross, HMP Featherstone, ROF Featherstone). When taking into account the provision of existing employment at Hilton Cross Business Park, and the emerging provision at ROF Featherstone, this would, in RPS opinion, lead to a different score for Featherstone in terms of access to employment. RPS suggest that a score of 'Good', and not 'medium', is more appropriate in this regard.</p> <p>Featherstone is also accessible to the West Midlands conurbation via public transport so is ideally placed to accommodate additional housing to help balance the provision of employment</p>	Not stated	No	Not stated	<p>Representation appears to relate to the Council's 2022 Regulation 19 Publication Plan, rather than the 2024 Publication Plan.</p> <p>The strategy for limiting growth to Featherstone by allocating existing safeguarded land is considered appropriate for a Tier 3 settlement given its relative level of services and facilities. Access to employment is just one factor influencing a settlements tier and was determined on an objective basis using the latest Hansen scores and reflecting access to existing employment at that time.</p> <p>The NPPF allows the Council to choose when Green Belt boundary changes are to be made, and this area's role in the settlement hierarchy and lesser public transport offer means Green Belt release is not proposed</p>

**CHAPTER 5 & POLICIES DS1-DS5: DEVELOPMENT STRATEGY AND SUPPORTING TEXT**

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			<p>currently provided. This 'balanced approach' to homes and jobs can assist in reducing the level of out-commuting, which the Council has identified as a key challenge for the District.</p> <p>The strategy which seeks to limit growth at Featherstone does reflect the available evidence and so is not soundly-based (not justified). The Land east of Brookhouse Lane, being promoted by Persimmon Homes, represents an ideal opportunity to help deliver this.</p> <p>The importance being placed on the SGS as the basis for allocating SA2: Land at Cross Green to address the needs of the Black Country raises concerns regarding the soundness of this approach. Specifically, the SGS does not take into account the relative affordability of housing in this area and its ability to meet the needs of black country residents. The data shows that house prices within the area where the Land at Cross Green site is allocated are nearly 60% higher than the average house price across the Black Country. This further supports the case for housing needs from the Black Country to be directed to Featherstone, where a broader mix of households already exists and where a mix of market and affordable housing can be easily integrated into the settlement. this brings into question the soundness of the approach in respect to the strategic location at Cross Green and specially whether households from the Black Country will be able to access housing. his problem is most likely going to be exacerbated due to the significant infrastructure needed to support a 'new village' at Cross Green.</p> <p>A more appropriate response would be to allocate additional land at Featherstone, Land east of Brookhouse where affordability is more consistent with that of the Black Country.</p>				Land at Cross Green is no longer proposed in the 2024 Publication Plan.
Bruton Knowles for owners of land off Primrose Close	AGT24-007-02-02	Policy DS5	The revised plan is correct to distribute of Housing across the district, however the level of housing proposed for tier 3 settlements is not supported and considered insufficient given such settlements provide facilities and services whose future needs to be supported by additional growth. For example, Wheaton Aston provides, two pubs, church and chapel, school adjacent to the subject site, bus routes to Stafford and Wolverhampton. Failing to provide additional growth undermines the sustainability of existing services and provision which is detrimental the settlements themselves.	Not stated	No	Not stated	<p>The level of housing growth proposed to Tier 3 villages (4.4% of plan total) is considered appropriate considering the relative level of services and facilities.</p> <p>Policy DS5 allows for additional windfall growth to come forward to assist in meeting local needs where it is consistent with other local plan policies.</p> <p>The NPPF allows the Council to choose when Green Belt boundary changes are to be made, and this area's role in the settlement hierarchy and lesser public transport offer means Green Belt release is not proposed.</p> <p>No change proposed.</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
Knight Frank for Pland Estates Ltd	AGT24-024-01-01	Policy DS5	<p>The allocation north of Penkridge should be reduced to 905 dwellings to reflect outline permissions. Not appropriate to include part of wider development consented under 19/00862/REM as a draft allocation. The approach of only releasing Green Belt around Tier 1 settlements is not justified. Approach of only releasing Green Belt at Tier 1 settlements due to being well served by public transport, does not mean that all new development adjacent to, within or around Tier 1 settlements will directly benefit from the availability of rail transport due to either distance to the site or lack of secondary or tertiary public transport (i.e. bus services) to link to the nearest railway station. It is therefore not considered robustly justified that directing major development predominantly into Tier 1 settlements, including green belt locations, will lead to more sustainably located development.</p> <p>It is therefore considered that the tier'ed approach to releasing Green Belt land is not justified and should be done on a case-by-case basis, including considering the site on land north of Featherstone as an allocation for residential development.</p>	Yes	No	Yes	<p>The site consented under 19/00862/REM is not included in the proposed allocation of 1029 homes on Land North of Penkridge.</p> <p>Given the scale of our Tier 1 villages, all sites proposed on their edge fall with 2km of the railway station, which the SA considers to be the maximum walking distance.</p> <p>The tiered approach and directing more development to the most sustainable Tier 1 settlements is supported by the Rural Services and Facilities audit and Spatial Housing Strategy Topic Paper 2024.</p>
Stantec for L&Q Estates Ltd	AGT24-041-01-03	Policy DS5	<p>Whilst Policy DS5 seeks to deliver the local housing for South Staffordshire need identified through Policy DS4, we consider that further housing allocations are required, given the GBBCHMA shortfall represents a 'best case scenario'. L&amp;Q Estates fundamentally disagrees with the assertion that the Strategic Growth Study is out of date. Even if it was, the indications within the Study were that the unmet need would increase, not decrease.</p> <p>In light of the above, we consider that further strategic housing sites, including Yieldfields Farm, should be allocated within the South Staffordshire Local Plan, in order to assist the Council in meeting the unmet housing need arising from the GBBCHMA. Such an allocation would be consistent with the now removed tier 'Growth adjacent to the neighbouring towns and cities in the Black Country'. the site could have a significant role in meeting the cross boundary unmet needs and is capable of delivering up to a total of 1,900 new homes, alongside the provision of two primary schools, local services and facilities as well as significant open space. Providing large urban extensions focused to the north of the Black Country aligns with para 60 and 73-74 of the NPPF.</p> <p>The 2024 is essentially an amendment to the 2022 Regulation 19 Plan. The Council only 'paused' preparation of its Local Plan following the 2022 Regulation 19 Plan consultation. On this basis as the Council's Local Plan reached the pre-submission consultation stage before 19th March 2024 and in these circumstances paragraph 230 requires the plan to be examined</p>	Not stated	No	Not stated	<p>The SGS 2018 quantified the shortfall and made spatial recommendations based on this in 2017/18, and so is now 6 years old and so it is the council's position that this is out of date evidence. This is supported by the fact that there is a commitment to update the SGS across the HMA, including from South Staffordshire Council.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>The relevant Regulation 19 Local Plan (April 2024) - which is the plan submitted for examination - reached Regulation 19 after 19 March 2024 and therefore aligns with the first</p>



Submission Local Plan Review  
Schedule of Publication Plan 2024 Representations and Responses

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			under the 2021 version of the NPPF. The Council's reasoning to significantly reduce the housing requirement is a tenuous attempt to justify the significant reduction in Green Belt release and to address the GBBCHMA authorities housing shortfall, which is well established. Even in the current 2024 Regulation 19 version of the Local Plan Review the Council have found there are exceptional circumstances to release land from the green belt however they have failed to properly address the requirements of paragraph 146 c) of the latest version of the NPPF.				sentence of paragraph 230 of the NPPF (December 2023). It is the Council's view therefore that the Local Plan should be examined against the December 2023 NPPF.
Emery Planning for Seabridge Development Ltd	AGT24-016-01-02	Policy DS5	<p>Huntington is a Tier 2 settlement in the plan. However, the level of development apportioned to Huntington in Table 8 of the plan is only 41 dwellings is significantly less development than other Tier 2 settlements within the plan and even less than the Tier 3 settlements of Coven and Featherstone. We recognise that the AONB is a constraint, but there are potential options for development that would have a limited impact upon the AONB.</p> <p>Given that we are now more than a decade on from the completion of the Littleton Colliery site, and bearing in mind the very low level of development provided in Huntington since that period, it is necessary to reconsider the future approach for Huntington, reflecting its status as a Tier 2 settlement and to ensure local needs are met. Huntington is therefore capable of accommodating higher levels of housing growth.</p>	Not stated	No	Not stated	The level of growth for Tier 2 settlements has been determined 'bottom up' by the capacity of suitable sites (assessed through the Housing Site Assessment Topic Paper) that accord with the preferred spatial strategy (Spatial Option i), as opposed to a 'top down' figure for each village being provided. Taking this approach will lead to a variation in levels of growth between settlements within the same tier, but this reflects both village and site-specific constraints and therefore is considered an appropriate approach.
Emery Planning for Wain Estates	AGT24-016-02-07	Policy DS5	<p>The policy should be amended to name the Tier 5 settlements, either within the policy or a table in the supporting text.</p> <p>The overall approach of the policy is contrary to NPPF P78-79 and para 67-009 of the PPG.</p> <p>The approach set out in Policy DS5 is not consistent with the national planning policy objectives of enhancing the vitality of rural communities, or providing opportunities for villages to grow and thrive, especially where this will support local services. The council's Rural Services and Facilities Audit (RSFA) only considers current service provision and as such it in no way provides a sound basis to justify the proposed distribution of development. The Council's justification in the Spatial Housing Strategy Topic Paper is also predicated on existing service provision. The Council's justification is largely based upon reducing reliance upon journeys by private car. The Council's approach has no regard to the role that cycling, ultra low and zero emission vehicles, car sharing and public transport can play in Tier 4 and 5 settlements, including the opportunities brought about by new development. The Council's approach would do absolutely nothing to support local services, and it certainly would not provide opportunities for villages to grow and thrive.</p>	Not stated	No	No	<p>The policy already confirms that the Tier 5 settlements are set out in the Rural Services and Facilities Audit 2021 and therefore it is not considered necessary to repeat them in the policy.</p> <p>It is considered that Policy DS5 takes a balanced approach by focusing growth permanently on the most sustainable Tier 1 settlements, but also allows for proportionate growth in lower tier settlements, through both allocations and windfall developments.</p> <p>Whilst it is accepted that increased cycling and ultra-low emission vehicle infrastructure will hopefully increase their uptake in the future, at the present time more journeys are taken via private vehicle and therefore directing the majority of growth to locations with better public transport infrastructure to support a modal shift is considered appropriate. The Council has seen no evidence to suggest that cycling, ultra-low and zero emission vehicles, car sharing, and</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>Rather, the proposed approach would only lead to further stagnation. We therefore consider that a level of development should be directed to the Tier 4 and 5 settlements,</p> <p>RSFA presents an inaccurate picture of Acton Trussell because it fails to look at the wider picture of sustainability. Taking into account service provision at neighbouring Dunston and Acton Gate, the settlement could be considered as a Tier 3 settlement, or individually as a Tier 4 settlement based on existing service provision. Through development there is an opportunity to make the settlement more sustainable and provide services such as a village shop, and our client is proposing an omission site which could achieve this.</p> <p>Under the Council’s site selection methodology any site within Acton Trussell was automatically discounted due to it being a Tier 5 settlement. However, given that the Borough is heavily constrained by Green Belt, the Council should be considering all other reasonable alternatives, with a view to minimising the amount of Green Belt release. Furthermore, there could have been consideration of expanding Acton Trussell as a new garden village / settlement, similar to the new settlement considered at Dunston under Option A of the spatial housing options.</p> <p>The base date used for the monitoring of the housing and employment land supply, as referenced at numerous points within the plan, is April 2023. Therefore, the end date of the strategic policies relating to housing and employment land supply is 31 March 2041. This means for the strategic policies to cover at least 15-years from adoption, it must be adopted by 31 March 2026. The Council’s current Local Development Scheme (dated September 2023) projects that the plan will be adopted in ‘winter 25/26’. That date is extremely close to the final possible adoption date of 31 March 2026 based on a plan period end date of 2041. To avoid this risk, the plan period should be extended. We consider a plan period to 2042 or 2043 would be more appropriate to reduce the risk of the plan period having to be extended again during the examination process.</p>				<p>public transport can play a meaningful role in Tier 4 and 5 villages.</p> <p>Assessment of settlements in the 2021 Rural Services and Facilities Audit has been undertaken on a consistent basis and therefore the Council stands by Acton Trussell status as a Tier 5 settlement. Whilst the Council is required to examine fully all other reasonable options (to Green Belt release) in meeting development needs, development at unsustainable Tier 5 or other rural locations is not considered a reasonable option, with the exception of new settlement/urban extension proposals which have been assessed as reasonable alternatives.</p> <p>Proposals of a scale that could form a new settlement have been considered through the Sustainability Appraisal and Housing Site Assessment Topic Paper 2024.</p> <p>The Council considers that adoption by early 2026 to be ambitious by realistic. It is accepted that if this is not the case then it will impact on the end of the plan period.</p>
Stansgate Planning for Payne Hicks Beach Trust Corporation Ltd	AGT24-040-01-03	Policy DS5	<p>The overall housing target identified in Policy DS5 is not considered to adequately address the housing needs of the Housing Market Area (HMA). See separate representations in relation to Policy DS4 and housing needs.</p> <p>The approach to locate growth at the most sustainable locations within the District is supported, however, the settlement hierarchy set out within Policy DS5 is considered to be flawed.</p> <p>Clear evidence that Wombourne should be categorised as a Tier 1 settlement as it has a very similar, if not greater level of</p>	No	No	No	<p>Justification for the council’s spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district’s growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan’s ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home</p>

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			<p>accessibility to services and facilities than Penkridge. The proposed categorisation as a Tier 2 settlement is unjustified and Wombourne should be reclassified as a Tier 1 settlement.</p> <p>Appendix 4 of the RSFA sets out a table of facilities and services at each of the settlements appraised. Wombourne, when compared against Penkridge, is confirmed as having access to a wider range of retail opportunities, additional GP surgeries, additional pharmacies, more dental surgeries, more churches, more village hall facilities, more pubs and more day nurseries. Wombourne and Penkridge are shown as having similar levels of education provision, libraries, sports provision and travel times to larger centres. Whilst there is no railway station within Wombourne the frequency and ease of access to bus routes which link Wombourne to the adjacent higher order settlements of Wolverhampton, Dudley and Stourbridge, in particular, are not fully considered.</p> <p>The ability for people to travel to employment opportunities by bus should be given equal, if not greater, weight than the availability of railway stations for access to employment opportunities in the categorisation of settlements within the hierarchy.</p>				<p>contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>It is acknowledged that settlements within the same tier will have varying levels of services and facilities and that Wombourne has a good level of services comparable to other Tier 2 settlements. However, the use of access to employment (utilising the Hansen scores) as factor in determining the tiers of villages is considered appropriate given that commuting is one of the main reasons for travel and lying within a tier 1 village gives residents direct access to Birmingham, the region's main employment (and retail/leisure) centre via a sustainable transport mode. As referenced in our Spatial Strategy Topic Paper 2024, recent research suggests that there is a pattern of continued decline in the frequency of bus services both within South Staffordshire and neighbouring authorities, with the frequency of bus services declining 57% across the district since 2010. Therefore, areas of the district outside of Tier 1 settlements entirely reliant on bus services for sustainably accessing employment may not necessarily be able to rely on those services going forward.</p>
Vista Planning Ltd for Hampton Oak Ltd	AGT24-043-01-01	Policy DS5	<p>Spatial strategy proposes less allocations in Tier 3 settlements than the previous publication version of the plan.</p> <p>It retains a significant reliance on windfall housing delivery without any realistic prospect of that coming forward due to the Green Belt nature of the district. The reality is that the only windfall development (beyond single plots or conversions) that will be possible will be rural exception proposals. The delivery of c. 600 homes as predominantly rural exception schemes seems highly unrealistic. Tier 1 settlements account for over 60% of the total housing supply and over 95% of the new housing allocations. Any delays in the delivery of these sites will inevitably have significant impacts on the ability for the council to maintain a 5 year supply of housing land. As such, it is considered that this is another compelling reason for the spatial strategy to look to the lower tier settlements for further housing growth through allocation.</p> <p>Policy requires redrafting to ensure that the delivery of the homes presently identified for allocation through the Local Plan</p>	No	No	No	<p>The windfall allowance of 40 dwellings per annum is evidenced and justified in the SHELAA (2024), with a conservative approach taken to setting this allowance.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial</p>

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			review should be much greater having full regard to the requirement to increase the contribution towards the unmet needs arising from GBBCHMA overspill and the need to eliminate the uncertainty of windfall reliance, particularly where it forms such a significant proportion of total supply.				strategy (spatial option I).
RCA Regeneration for Barberry Developments	AGT24-036-01-02	Policy DS5	We believe that the spatial strategy should allocate potential housing sites on the urban fringes of the Black Country which already benefit from good sustainable transport links and higher order services such as surgeries, schools and shops. There are also significant employment opportunities throughout the Black Country that simply do not exist within the rural areas of South Staffordshire. We believe policy DS5 should encourage strategic development in urban fringe locations to extend existing larger settlements.	No	No	No	All urban fringe locations on the edge of the Black Country are Green Belt locations. The strategy focuses Green Belt release on the districts most sustainable Tier 1 settlement within walking distance of rail access. The broad location of the urban fringe of the Black Country does not offer the level of public transport, particularly to employment centres in the district and surrounding areas, which are present in the District's Tier 1 settlements and are therefore not considered to be well served by public transport, relying on limited bus services to access higher order services.
RCA Regeneration for Seven Capital	AGT24-036-03-02	Policy DS5	We believe that the spatial strategy should allocate potential housing sites on the urban fringes of the Black Country which already benefit from good sustainable transport links and higher order services such as surgeries, schools and shops. There are also significant employment opportunities throughout the Black Country that simply do not exist within the rural areas of South Staffordshire. We believe policy DS5 should encourage strategic development in urban fringe locations to extend existing larger settlements.	Not stated	No	No	All urban fringe locations on the edge of the Black Country are Green Belt locations. The strategy focuses Green Belt release on the districts most sustainable Tier 1 settlement within walking distance of rail access. The broad location of the urban fringe of the Black Country does not offer the level of public transport, particularly to employment centres in the district and surrounding areas, which are present in the District's Tier 1 settlements and are therefore not considered to be well served by public transport, relying on limited bus services to access higher order services.
RCA Regeneration for St Phillips	AGT24-036-04-02	Policy DS5	We believe that the spatial strategy should allocate potential housing sites on the urban fringes of the Black Country which already benefit from good sustainable transport links and higher order services such as surgeries, schools and shops. There are also significant employment opportunities throughout the Black Country that simply do not exist within the rural areas of South Staffordshire. We believe policy DS5 should encourage strategic development in urban fringe locations to extend existing larger settlements.	Not stated	No	No	All urban fringe locations on the edge of the Black Country are Green Belt locations. The strategy focuses Green Belt release on the districts most sustainable Tier 1 settlement within walking distance of rail access. The broad location of the urban fringe of the Black Country does not offer the level of public transport, particularly to employment centres in the district and surrounding areas, which are present in the District's Tier 1 settlements and are therefore not considered to be well served by public transport, relying on limited bus services to access higher order services.
RCA Regeneration for Richborough	AGT24-036-02-	Policy DS5	We believe that the spatial strategy should allocate potential housing sites on the urban fringes of the Black Country which	Not stated	No	No	All urban fringe locations on the edge of the Black Country are Green Belt locations. The

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Estates	02		already benefit from good sustainable transport links and higher order services such as surgeries, schools and shops.				strategy focuses Green Belt release on the districts most sustainable Tier 1 settlement within walking distance of rail access. The broad location of the urban fringe of the Black Country does not offer the level of public transport, particularly to employment centres in the district and surrounding areas, which are present in the District's Tier 1 settlements and are therefore not considered to be well served by public transport, relying on limited bus services to access higher order services.
Gallan, W & J	RES24-076-01	Policy DS5	We support the Council's proposal as the best alternative option.	Not stated	Not stated	Not stated	Support noted.
Evolve Planning & Design for Lovell Homes	AGT24-017-05-01	Policy DS5	<p>Lovell Homes supports the proposed spatial strategy to 2041 which recognises environmental capacity and seeks to make best use of existing infrastructure whilst recognising opportunities to deliver new infrastructure.</p> <p>Settlement hierarchy – Lovell Homes supports the settlement hierarchy which considers the relative sustainability of villages within the District. Wombourne achieved one of the highest services/facilities rankings of all villages within the District despite it not benefitting from a railway station and Lovell Homes supports the identification of it as a Tier 2 settlement.</p> <p>Spatial distribution of housing growth – Lovell Homes supports the distribution of housing growth to the most sustainable villages. Lovell Homes considers that the proposed development strategy has due regard to where housing needs exist.</p>	Not stated	Not stated	Not stated	Support noted.
Evolve Planning & Design for Keon Homes	AGT24-017-04-01	Policy DS5	<p>Keon Homes supports the proposed spatial strategy to 2041 which recognises environmental capacity and seeks to make best use of existing infrastructure whilst recognising opportunities to deliver new infrastructure.</p> <p>Settlement hierarchy – Keon Homes supports the settlement hierarchy which considers the relative sustainability of villages within the District. The settlement hierarchy recognises that the Tier 3 settlements also provide a sustainable location to accommodate growth, including Wheaton Aston which contains a wide range of services and facilities.</p> <p>Spatial distribution of housing growth – Keon Homes supports the distribution of housing growth to the most sustainable villages. Keon Homes considers that the proposed development strategy has due regard to where housing needs exist.</p>	Not stated	Not stated	Not stated	Support noted.
Evolve Planning & Design for Four	AGT24-017-03-	Policy DS5	Four Ashes Road Ltd supports the proposed spatial strategy to 2041 which recognises environmental capacity and seeks to	Not stated	Not stated	Not stated	Support noted.



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Ashes Road Ltd	01		<p>make best use of existing infrastructure whilst recognising opportunities to deliver new infrastructure.</p> <p>Settlement hierarchy – Four Ashes Road Ltd supports the settlement hierarchy which considers the relative sustainability of villages within the district. Brewood achieved one of the highest services/facilities rankings of all villages within the district despite it not benefitting from a railway station and Four Ashes Road Ltd supports the identification of Brewood as a Tier 2 settlement.</p> <p>Spatial distribution of housing growth – Four Ashes Road supports the distribution of housing growth to the most sustainable villages. Four Ashes Road considers that the proposed development strategy has due regard to where housing needs exist.</p>				
Evolve Planning & Design for Cameron Homes	AGT24-017-02-09  AGT24-017-02-01	Policy DS5	<p>Cameron Homes supports the proposed spatial strategy to 2041 which recognises environmental capacity and seeks to make best use of existing infrastructure whilst recognising opportunities to deliver new infrastructure.</p> <p>Settlement Hierarchy - Cameron Homes supports the settlement hierarchy which considers the relative sustainability of villages within the District. The identification of Coven as a Tier 3 settlement where growth will come forward through appropriate allocation is generally supported. Land between A449 Stafford Road and School Lane is identified as an allocation and acknowledged to deliver the Council's preferred strategy. This is supported and the allocation clearly accords with the spatial strategy. (A449 Stafford Road and School Lane).</p> <p>Cheslyn Hay / Great Wyrley achieved one of the highest services/facilities rankings of all villages within the District and Cameron Homes supports the identification of them as a Tier 1 settlement. (Landywood Lane)</p>	Not stated	Not stated	Not stated	Support noted.
Evolve Planning & Design for Cameron Homes	AGT24-017-02-01  AGT24-017-02-17	Policy DS5	<p>Spatial distribution of housing growth – Cameron Homes supports the distribution of housing growth to the most sustainable villages. Housing growth appears to be focused to the north of the district which aligns to the location of the Tier 1 settlements and the proposed employment strategy. Cameron Homes considers that the proposed development strategy has due regard to where housing needs exist. Cameron Homes would wish to reiterate concerns that Cheslyn Hay and Great Wyrley are afforded less growth than the two other Tier 1 settlements which appears unbalanced. (Land east of Wolverhampton Road &amp; Landywood Lane)</p>	Not stated	Not stated	Not stated	<p>Support noted.</p> <p>The level of growth for Tier 1 settlements has been determined 'bottom up' by the capacity of suitable sites (assessed through the Housing Site Assessment Topic Paper) that accord with the preferred spatial strategy (Spatial Option i), as opposed to a 'top down' figure for each village being provided. Taking this approach will lead to a variation in levels of growth between settlements within the same tier, but this reflects both village and site-specific constraints and therefore is considered an appropriate approach.</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
Evolve Planning & Design for Bloor Homes	AGT24-017-01-09  AGT24-017-01-02	Policy DS5	<p>Bloor Homes supports the proposed spatial strategy to 2041 which recognises environmental capacity and seeks to make best use of existing infrastructure whilst recognising opportunities to deliver new infrastructure.</p> <p>Settlement Hierarchy Grange Farm, Coven Bloor Homes supports the settlement hierarchy which considers the relative sustainability of villages within the District. Coven appears to achieve the highest services/facilities rankings of all villages within the District of the Tier 3 villages within the latest Rural Services and Facilities Audit – only falling short of Tier 2 status by virtue of lack of secondary/high school provision.</p> <p>Bloor Homes supports the settlement hierarchy which considers the relative sustainability of villages within the District. While the Rural Services and Facilities Audit does not consider locations adjacent to other adjacent towns and cities, these locations should be recognised as sustainable locations for growth.</p>	Not stated	Not stated	Not stated	Comments noted.
Evolve Planning & Design for Bloor Homes	AGT24-017-01-25  AGT24-017-01-18  AGT24-017-01-01  AGT24-017-01-09	Policy DS5	<p>Spatial Distribution of Housing Growth</p> <p>The Straits - Bloor Homes supports the distribution of housing growth to meet locally derived housing need by directing proportionate growth to the most sustainable villages, however any contribution to meet identified unmet needs arising from the Black Country should be focused to the edge of the conurbation to meet need where it arises.</p> <p>Royal's Farm - Bloor Homes supports the distribution of housing growth through proportionate growth focused to the villages. It is noted that no proposed growth is identified to the west of Cannock within South Staffordshire due to Cannock's lack of unmet need in the short term.</p> <p>Additional land east of Bilbrook &amp; land east of Bilbrook Bloor Homes supports the distribution of housing growth to the most sustainable villages, including Codsall/Bilbrook to deliver a higher amount of growth. Bloor Homes considers that the proposed development strategy not only assists in providing improved infrastructure but also has due regard to where housing needs exist.</p>	Not stated	Not stated	Not stated	<p>Comments noted.</p> <p>All urban fringe locations on the edge of the Black Country are Green Belt locations. The strategy focuses Green Belt release on the districts most sustainable Tier 1 settlement within walking distance of rail access. The broad location of the urban fringe of the Black Country does not offer the level of public transport, particularly to employment centres in the district and surrounding areas, which are present in the District's Tier 1 settlements and are therefore not considered to be well served by public transport, relying on limited bus services to access higher order services.</p>
Harris Lamb for Folkes	AGT24-022-01-01	Policy DS5	<p>Folkes do not consider that the Development Strategy is sound or that it complies with the NPPF.</p> <p>Folkes agree fully with the Council that exceptional circumstances exist to support the release of Green Belt land.</p>	Not stated	No	No	Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>Where Folkes differs from the Council is that they consider the evidence supports the release of significantly more land to meet the unmet housing need across the HMA. We would welcome the opportunity to discuss this matter with the Council and to review any evidence based documents that support the conclusion on how much land should be released.</p> <p>When it comes to Green Belt boundaries, they should endure beyond the plan period. It is evident that the Council has made no attempt to safeguard land for future development needs arising from South Staffordshire or the wider HMA. This is a significant shortcoming and means the requirements of the NPPF have not been met.</p>				<p>2024.This balances the district’s growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan’s ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council’s Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>The Council considers that it would be inappropriate to release additional land from the Green Belt for safeguarded land through this Local Plan, given the need for any such release to be justified by exceptional circumstances.</p> <p>It is acknowledged that the approach to future Green Belt release will be considered through an updated Strategic Growth Study across the GBBCHMA which South Staffordshire will be an active partner in, and it is right to consider this issue strategically across this wider functional geography. To date, no GBBCHMA authority has requested that South Staffordshire provide additional safeguarded land for longer term unmet needs, nor has this been required in recent examinations in the GBBCHMA. Given these factors and the requirement in national policy to review the plan in whole or in part every 5 years, it is not considered appropriate or necessary to release safeguarded land at this stage.</p>
Harris Lamb for Heyfield Developments Ltd	AGT24-022-02-01	Policy DS5	<p>Heyfield Developments Ltd (HD) do not consider that the Development Strategy is sound or that it complies with the NPPF.</p> <p>HD agree fully with the Council that exceptional circumstances exist to support the release of Green Belt land. Where HD differs from the Council is that they consider the evidence supports the release of significantly more land to meet the unmet housing need across the HMA. We would welcome the opportunity to discuss this matter with the Council and to review any evidence based documents that support the conclusion on how much land should be released.</p> <p>When it comes to Green Belt boundaries, they should endure</p>	Not stated	No	No	<p>Justification for the council’s spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024.This balances the district’s growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan’s ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council’s Housing Site Assessment Topic Paper, that conformed with the preferred spatial</p>

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			<p>beyond the plan period. It is evident that the Council has made no attempt to safeguard land for future development needs arising from South Staffordshire or the wider HMA. This is a significant shortcoming and means the requirements of the NPPF have not been met.</p> <p>We note the Plan identifies housing growth adjacent to Stafford to facilitate growth in a non-GB location. The Council, therefore, appear willing to direct growth to the edge of Stafford which is outside the HMA that South Staffordshire is in, purely on the basis that the land is not in the Green Belt.</p>				<p>strategy (spatial option I).</p> <p>The Council considers that it would be inappropriate to release additional land from the Green Belt for safeguarded land through this Local Plan, given the need for any such release to be justified by exceptional circumstances.</p> <p>The approach to future Green Belt release will be considered through an updated Strategic Growth Study across the GBBCHMA which South Staffordshire will be an active partner in, and it is right to consider this issue strategically across this wider functional geography. To date, no GBBCHMA authority has requested that South Staffordshire provide additional safeguarded land for longer term unmet needs, nor has this been required in recent examinations in the GBBCHMA. Given these factors and the requirement in national policy to review the plan in whole or in part every 5 years, it is not considered appropriate or necessary to release safeguarded land at this stage.</p> <p>Directing growth to non-Green Belt land In a sustainable location south of Stafford is appropriate and aligns with the requirements of NPPF para 146 to examine all reasonable options to meeting housing needs, before exceptional circumstances for Green Belt release can be justified.</p>
Savills UK Ltd for FGD Ltd	AGT24-038-03-01	Policy DS5	<p>We do not consider that sufficient justification has been provided for not pursuing Option G (or a hybrid of Option G and I) when it was previously assessed by SSDC in 2022 as being the most suitable option (Sustainability Appraisal 2022). From our review, it appears that Option I has been 'created' by the Council in order to achieve their interpretation of the amended NPPF 2023 and support the reduction in housing to meet local and wider housing market area needs.</p> <p>SSDC has produced evidence in order to support their unjustified desire to deliver less housing in the 2024 plan, rather than the evidence informing the strategy and approach to growth as they did for the 2022 plan. The approach to the spatial strategy is not justified and is therefore unsound (NPPF paragraph 35b).</p> <p>The Sustainability Appraisal and Spatial Option I fails to consider that there are settlements outside of the SSDC, for example the edge of the Black Country, which are far more sustainable than</p>	Not stated	No	Not stated	<p>Option G was based on a 4000-home contribution to the wider HMA which was a 'top down' figure justified by the 2018 Strategic Growth Study which is now considered out of date. Option I was assessed alongside other spatial options in the SA and was on balance considered the best performing option, albeit similar to a number of other spatial options assessed.</p> <p>All urban fringe locations on the edge of the Black Country are Green Belt locations. The strategy focuses Green Belt release on the districts most sustainable Tier 1 settlement within walking distance of rail access. The broad location of the urban fringe of the Black Country does not offer the level of public transport, particularly to employment centres in the district and surrounding areas, which are present in the</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>the Tier 1 settlements assessed. Site reference 577, is located immediately adjacent to the urban area of Dudley and is well related to existing development and facilities, with good public transport connections. Site reference 577 is therefore in a highly sustainable location.</p> <p>In order to policies DS4 and DS5 to be sound, SSDC should be planning for additional housing growth to meet a housing requirement above the minimum housing needs and accommodates more than 640 dwellings to address the GBBCHMA shortfall. Site reference 577 is located immediately adjacent to the edge of the black country and is considered a highly sustainable location. Therefore my client's land should be considered for release from the Green Belt and allocation in the plan.</p>				<p>District's Tier 1 settlements and are therefore not considered to be well served by public transport, relying on limited bus services to access higher order services. The SA has considered residential distribution options including small- and large-scale urban extensions on the edge of the Black Country as reasonable alternatives. The Council's chosen residential distribution option is a combination of Option A, focusing growth on the districts larger and better-connected villages, and Option F, of introducing minimum housing densities which the Council will achieve through the implementation of Policy HC2. In terms of SA performance, the options are broadly comparable.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth. The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p>
Harris Lamb for Redrow Homes	AGT24-022-03-05	Policy DS5	<p>Redrow Homes (RH) do not object in principle to the spatial strategy in terms of the Council seeking to meet its own housing needs. However, RH do object in respect of wider unmet housing need arising in the HMA and how this is not being addressed at the current time.</p> <p>The risk in not identifying any specific allocations in Tier 2 to Tier 4 settlements may mean that they do not receive any further development which as a result could leave an aging population resident in the settlement and a corresponding decrease in demand for certain services (i.e. primary schools) or increase for other services (i.e. GP services).</p> <p>In terms of the split in development that is to be directed to the various tiers of the settlement hierarchy we note that just under half of the housing requirement for the whole District is to be directed to the settlements of Penkrige and Codsall / Bilbrook.</p>	Yes	No	Not stated	<p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>It is considered that Policy DS5 takes a balanced approach by focusing growth predominantly on the most sustainable Tier 1 settlements, but also allows for proportionate growth in lower tier settlements, through both allocations and windfall developments.</p> <p>All urban fringe locations on the edge of the</p>



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			<p>Whilst there is certainly merit in directing a significant proportion of growth to the most sustainable settlements it should not be at the expense of ensuring proportionate levels of growth in the remaining areas of the District.</p> <p>RH consider that the land at Castlecroft Farm is one such location where new development could be accommodated in close proximity to the existing urban area that could meet needs arising outside of the District. In sustainability terms this is considered a more appropriate approach as it would be meeting the needs of where it was arising. As such, RH do not consider that the spatial strategy is sound as the policy is not positively prepared as the unmet need is not being met where it is practical to do so and thereby a more sustainable option is available as opposed to the that is currently proposed. Furthermore, we do not consider that the policy is effective as it is not based on effective joint working on cross boundary strategic matters.</p> <p>The Council, therefore, appear willing to direct growth to the edge of Stafford which is outside of the HMA that South Staffordshire sits purely on the basis that the land is not in the Green Belt.</p>				<p>Black Country are Green Belt locations. The strategy focuses Green Belt release on the districts most sustainable Tier 1 settlement within walking distance of rail access. The broad location of the urban fringe of the Black Country does not offer the level of public transport, particularly to employment centres in the district and surrounding areas, which are present in the District's Tier 1 settlements and are therefore not considered to be well served by public transport, relying on limited bus services to access higher order services.</p> <p>Directing growth to non-Green Belt land in a sustainable location south of Stafford is appropriate and aligns with the requirements of NPPF para 146 to examine all reasonable options to meeting housing needs, before exceptional circumstances for Green Belt release can be justified.</p>
Berrys for John Davies Farms Ltd	AGT24-006-02-07	Policy DS5	The Plan is considered to be unsound as it fails to meet the development needs of Tier 4 settlements, make an appropriate contribution to the unmet housing needs of the Greater Birmingham Housing Market Area and meet small site housing requirements identified in the NPPF.	Not stated	No	Not stated	<p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>Development in Tier 4 settlements is limited to "very limited windfall housing growth to assist in safeguarding the limited services and facilities in each village and to address local housing needs", in accordance with Policy DS5.</p> <p>Given the limited services and facilities available in these settlements and their lack of sustainability credentials (as evidenced by our</p>

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							<p>Rural Services and Facilities Audit 2021), it is not considered appropriate to allocate sites at these settlements.</p> <p>The council can already meet its duty to accommodate at least 10% of the housing requirement on sites no larger than one hectare without allocating additional small sites at Tier 4 settlements.</p>
RPS Group for IM Land	AGT24-037-01-04	Policy DS5	<p>Details on the spatial strategy options and choices can be found in the full representation. RPS would go further to suggest that the Council has simply devised two additional spatial options (Options H and I) as part of the revised Reg 19 Plan, which merely reinforce the wider objective of reducing the overall scale of growth in the District compared to that which was planned for in the first Reg 19 Plan, using 'capacity' as a smokescreen for the revisions.</p> <p>Taken together, the Council's approach to revising the spatial strategy in this context is not positively prepared and is represents a backwards step in terms of planning to meet wider development needs, whilst the decision to limit Green Belt release to only Tier 1 settlements is arbitrary in nature. The revised strategy is not soundly-based.</p> <p>Details on the housing trajectory and recent housing delivery can be found in the full representation.</p> <p>It is evident that the second Reg 19 Plan is effectively seeking to 'turning the tap off' housing delivery between 2024 and 2028. The second Reg 19 Plan and the supporting evidence does not explain why limiting growth in the early years of the trajectory is justified. There is clearly a need for a measured increase in additional smaller sites in the early years, which can help shore up the planned decline in delivery currently proposed. A suitable site to help address this issue is the Land at Limepit Lane, Huntingdon.</p> <p>The second Reg 19 Plan says that growth will be located at the most accessible and sustainable locations in accordance with the settlement hierarchy. Huntingdon is also located in close proximity to the development at Pye Green Road, also located in Cannock District, where a range of community facilities and services are being provided, also located within 1 mile of Huntingdon. These considerations have been ignored in the update of the SHSTP (and in previous versions).</p> <p>RPS would draw to the Inspector's attention the Council's Preferred Options Document (POD), which at the time directed</p>	Not stated	No	Not stated	<p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>The Council is confident it will be able to demonstrate a 5-year supply on adoption of the plan and has set out an indicative housing supply trajectory in Appendix G of the plan. This is the requirement of the NPPF as opposed to meeting our annualised housing requirement for each of the first five years following adoption. Some site allocations will take time to come forward but will deliver in the latter half of the 5-year period.</p> <p>The RSFA has considered facilities and services up to 1 mile walk away from the development boundary of settlements being accessed that can be accessed on foot via safe and legible routes with well-lit footways. Public transport access to main centres, supermarkets and hospitals have also been considered in assessing tiers that villages fall within.</p> <p>Site 591 is assessed in the Housing Site Assessment Topic Paper (2024) with the reasons for not selecting the site set out in the site specific proforma.</p>

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			<p>92 dwellings to Huntington, including the additional site allocation of 44 dwellings on Land north of Limepit Lane (IM Land's site), part of SHLAA Site. The Council clearly concluded that there was capacity for additional growth to be accommodated at Huntington. However, the Council does not explain why this reasonable alternative growth option of 92 dwellings for Huntington has been excluded from the revised SHSTP, when previously supported by the Council.</p> <p>Actions - Assess the growth figure for Huntington (based on a minimum of 92 dwellings proposed at the Preferred Options stage) in order to reflect the status and location of the settlement in the hierarchy and the evidence on the proximity of the Huntington to Cannock. Identify sufficient land to meet this apportionment of the housing requirement, notably Land north of Limepit Lane (site 591). Alternatively, the Council should identify the site as safeguarded land in this second Reg 19 Plan, consistent with the approach adopted in the current development plan.</p>				<p>The Council considers that it would be inappropriate to release additional land from the Green Belt for safeguarded land through this Local Plan, given the need for any such release to be justified by exceptional circumstances.</p> <p>It is acknowledged that the approach to future Green Belt release will be considered through an updated Strategic Growth Study across the GBBCHMA which South Staffordshire will be an active partner in, and it is right to consider this issue strategically across this wider functional geography. To date, no GBBCHMA authority has requested that South Staffordshire provide additional safeguarded land for longer term unmet needs, nor has this been required in recent examinations in the GBBCHMA. Given these factors and the requirement in national policy to review the plan in whole or in part every 5 years, it is not considered appropriate or necessary to release safeguarded land at this stage.</p>
Savills UK Ltd for Clowes Developments Ltd	AGT24-038-02-03	Policy DS5	<p>We object to DS5. Paragraph 5.13 states that SSDC has tested further spatial strategy options. Option I was not previously consulted on or identified as a preferred option in the 2022 Publication Plan. The PPG requires a Sustainability Appraisal and we do not consider that sufficient justification has been provided for pursuing Option I.</p> <p>Option I appears to have been 'created' by the Council in order to achieve their interpretation of the amended NPPF and support the reduction in housing. SSDC have not provided justification on the reasonable alternatives assessed around the Tier 1 settlements for the HMA contribution and why the proposed capacity is limited to 640 dwellings. This approach is unjustified and unsound. Two sites have been allocated which are in the Green Belt and not in Tier 1 settlements, showing inconsistency with Option I.</p> <p>The Spatial Strategy should be amended to reflect a strategy which is positively prepared and justified, providing evidence to demonstrate that the proposed strategy is truly 'capacity-led'.</p> <p>Land at Lawnswood Road Greater consideration should be given to the sustainability credentials of directing development towards the edge of the Black Country. Lawnswood is classed as a Tier 5 settlement. The site adjoins the urban area of Wordsley which is linked to the</p>	Yes	No	Yes	<p>Whilst the Sustainability Appraisal should inform the Local Plan it does not in itself make strategy or site-specific decisions. Notwithstanding this, the SA does assess Option I alongside other spatial distribution options and does conclude that on the whole Option I could be identified as the preferable option, although it is acknowledged that most the spatial options perform similarly in SA terms. The Council's Spatial Housing Strategy 2024 has considered the merits of spatial options in more detail when arriving at Option I as the preferred option.</p> <p>All 'potentially suitable' sites in the Council SHELAA have been assessed as reasonable alternatives, including those adjoining a village development boundary or where the site is a short distance from the host settlement and a legible and safe pedestrian route and means of access to the host settlement can be demonstrated, including site suggestions around Tier 1 settlements. These potentially suitable sites have been assessed on a consistent basis to arrive at the preferred allocations as set out in the Housing Site Assessment Topic Paper 2024. The 640-home contribution is the output of the</p>

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			<p>wider Black Country conurbation. The adopted Dudley Borough Development Strategy states that Wordsley is a local centre (Tier 3) and the edge is approximately 1 mile from the site, with the wider Wordsley settlement bordering the site. Desktop research indicates that a number of services are located in Wordsley and it is important to consider this when looking to plan for unmet need of the wider Black Country. Plans are in the full representation (DS5) to show the facilities.</p>				<p>capacity of the suitable housing sites.</p> <p>All urban fringe locations on the edge of the Black Country (including land around Lawnswood) are Green Belt locations. The strategy focuses Green Belt release on the districts most sustainable Tier 1 settlement within walking distance of rail access. The broad location of the urban fringe of the Black Country does not offer the level of public transport, particularly to employment centres in the district and surrounding areas, which are present in the District's Tier 1 settlements and are therefore not considered to be well served by public transport, relying on limited bus services to access higher order services.</p> <p>Given the limited services and facilities available in Tier 5 settlements and their lack of sustainability credentials (as evidenced by our Rural Services and Facilities Audit 2021), it is not considered appropriate to allocate sites at these settlements.</p>
Lichfields for Richborough Estates	AGT24-026-01-03	Policy DS5	<p>No objections – in principle – to the thrust of the Council's proposed spatial strategy for employment. It is entirely logical to seek to focus additional employment growth in well-established employment locations. However, Richborough is concerned that draft Policy DS5 as it is drafted is unsound as it does not identify or allocate sufficient employment sites to provide for objectively assessed needs and those that cannot be met within neighbouring areas (Para 11b).</p> <p>Regarding the employment site promotion at Gailey Lea, Richborough is of the view that the analysis and justification provided by the Council for discounting the Site is poorly evidenced and not supported by justified evidence. There are no other 'sequentially preferable' strategic employment opportunities. The scale of the unmet employment needs of the FEMA is such that Green Belt release is fundamentally required to meet the longer-term strategic needs. As such, it is entirely reasonable to release 'high' performing Green Belt land at Gailey Lea to address the unmet employment needs of the FEMA. Richborough strongly contends that there is a clear and cogent need for additional employment land within the District to meet not just only the District's own employment needs, but to assist in addressing the acute shortfall arising from the BCAs, and Richborough's site should be included within the 2024 as a logical and sustainable strategic employment allocation.</p>	No	No	No	<p>The Council's 2022 Economic Development Needs Assessment (EDNA) and 2024 EDNA update are considered robust assessments and the 62.4ha and 107.45 figures are deemed reliable. The EDNA does consider both labour demand and past trends when arriving at a robust objectively assessed need figure for the district.</p> <p>The Local Plan meets our own objectively assessed needs and makes a considerable contribution of 112.2ha towards unmet need of the Black Country authorities and 10ha towards unmet needs of Cannock (including a proportion of WMI). This can be achieved through identification of non-Green Belt sites which are sequentially preferable, including the proposed allocation at M6, Junction 13.</p> <p>Given the healthy pipeline of employment sites and the requirement in national policy to review the plan in whole or in part every 5 years, it is not considered appropriate or necessary to release safeguarded land at this stage.</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			Should the matter be deferred Richborough considers that the effectiveness of the LPR could be significantly increased through the provision of an additional planning policy to safeguard land for future development, via the inclusion of a Safeguarded Land policy.				
Savills UK Ltd for Taylor Wimpey (Cross Green)	AGT24-038-05-02	Policy DS5	<p>We object to DS5. Paragraph 5.13 states that SSDC has tested further spatial strategy options. Option I was not previously consulted on or identified as a preferred option in the 2022 Publication Plan. The PPG requires a Sustainability Appraisal and we do not consider that sufficient justification has been provided for pursuing Option I rather than pursuing Option G. Option I appears to have been 'created' by the Council in order to achieve their interpretation of the amended NPPF and support the reduction in housing.</p> <p>SSDC claim Option I directs growth towards sustainable non-Green Belt development sites. SSDC have not provided justification on the reasonable alternatives assessed around the Tier 1 settlements for the HMA contribution and why the proposed capacity is limited to 640 dwellings. There are dismissed sites which perform comparatively to the sites proposed to be allocated (examples given in the full representation). There is inconsistency with how Option I has been applied to Green Belt sites. The Spatial Strategy should be amended to reflect a strategy which is positively prepared and fully justified.</p> <p>We do not consider that SSDC are achieving the objective to "meet needs in a manner which builds on the district's existing infrastructure and environmental capacity". Implications of removing Cross Green as an allocation are set out in DS5 representation and in DS4, SA3 and SA5 representations. Brinsford Park and Ride is listed in Appendix A of the IDP as an infrastructure project, without the allocation of Cross Green, the land will not be safeguarded to facilitate the future delivery of a park and ride station at Brinsford. Land at Cross Green should be re-allocated.</p>	Not stated	No	No	<p>Whilst the Sustainability Appraisal should inform the Local Plan it does not in itself make strategy or site-specific decisions. Notwithstanding this, the SA does assess Option I alongside other spatial distribution options and does conclude that on the whole Option I could be identified as the preferable option, although it is acknowledged that most the spatial options perform similarly in SA terms. The Council's Spatial Housing Strategy 2024 has considered the merits of spatial options in more detail when arriving at Option I as the preferred option.</p> <p>All 'potentially suitable' sites in the Council SHELAA have been assessed as reasonable alternatives, including those adjoining a village development boundary or where the site is a short distance from the host settlement and a legible and safe pedestrian route and means of access to the host settlement can be demonstrated, including site suggestions around Tier 1 settlements. These potentially suitable sites have been assessed on a consistent basis to arrive at the preferred allocations as set out in the Housing Site Assessment Topic Paper 2024. The 640-home contribution is the output of the capacity of the suitable housing sites.</p> <p>Delivery of Brinsford Park and Ride remains an aspiration of the Council if it can be demonstrated to be feasible, however it is recognised that it's suitability as a scheme remains uncertain with the West Midlands Combined Authority new stations report (February 2024) finding that enhancements to the existing bus network are likely to provide the best short to medium term solution, but this will be kept under review.</p>
Rapleys LLP for Vistry Group	AGT24-035-01-03	Policy DS5	Vistry does not dispute the general level of housing the Council is proposing for its own needs to be provided within the plan period. strongly objects to the vast reduction in unmet need provision, given the overall and increasing GBBCHMA shortfall	Not stated	No	No	Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024



**CHAPTER 5 & POLICIES DS1-DS5: DEVELOPMENT STRATEGY AND SUPPORTING TEXT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>and any subsequent lack of agreement to this reduced figure by the GBBCHMA Councils. Furthermore, the figure of 640 in Policy DS4 appears to have been arrived at simply as a consequence of the capacity of the sites chosen to meet its own identified needs and the capacity-led development strategy it has chosen to pursue. Whilst to a certain extent this is a product of the changes to the NPPF, it should not negate the requirement to plan effectively for increasing housing needs. It is effectively an arbitrary number/provision. Furthermore, it is not clear which allocated sites or locations are making this provision. Vistry considers, in the interests of transparency, that this should be made clear in the Plan.</p> <p>The 2041 Plan proposes to focus the majority of its housing requirement within two new strategic sites. It is recognised by Vistry that there is an inherent finite capacity for development within smaller settlements before other options have to be considered to accommodate the growth required, although Vistry maintain that further expansion of Bilbrook/Codsall, given its sustainable credentials is considered possible and sustainable. A number of the allocated sites have considerable constraints that affect their housing capacities that have not been fully recognised. As a result, they are not fully deliverable within the plan period raising questions as to whether they are in fact the most appropriate locations for the development. The 2041 Plan is unsound in this respect.</p>				<p>and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>The plan commits to providing a 640 contribution to unmet needs of the Great Birmingham and Black Country HMA, however, does not identify specific sites as making a cross-boundary contribution. The evidence demonstrates that the whole of the district is with the GBBCHMA and in reality, sites may be providing homes for both South Staffordshire residents and residents of neighbouring areas, and so it is not considered necessary to breakdown the contribution by site.</p> <p>The Council has worked proactively with site promoters and infrastructure providers on its two strategic allocations (Policies SA1-2) to masterplan the sites and create greater certainty over site delivery. The vast majority of sites in the plan are unconstrained greenfield sites and the Council has a very strong track record of delivering major schemes, with only two full applications lapsing over a period of 27 years (1996-2023) as detailed further on our Housing Monitoring and Five-Year Land Supply 2022-2023 document. The Council is very confident that the level of growth proposed in the plan is deliverable.</p>
Pland Estates Ltd	AGT24-033-01-01	Policy DS5	The justification for limiting green belt release to Tier 1 settlements is not inherently clear as the settlement tiers do not directly correlate with the green belt and its 5 purposes. Sustainable development can be achieved at sub Tier 1 settlements subject to immediate availability of public transport, services and facilities. Pattingham is a sustainable Tier 3 village and therefore should be allocated additional housing growth.	Yes	No	Yes	Focusing Green Belt release on the most sustainable Tier 1 settlements is considered an appropriate strategy and better aligns with the requirement to give first consideration to land well served by public transport. Walking access to rail is considered to have significant advantages over access to bus services due to increased access to employment as shown in the Hansen scores considered as part of the Rural Services and Facilities Audit 2021.

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
Savills UK Ltd for Taylor Wimpey (Linthouse Lane)	AGT24-038-05-30	Policy DS5	Spatial Option I fails to consider that there are settlements outside of the SSDC, on the edge of the Black Country, which are far more sustainable than the Tier 1 settlements assessed. Land north of Linthouse Lane is immediately adjacent to the urban area of Wolverhampton and is well related to existing development and facilities, with good public transport connections. The Spatial Strategy should be amended to reflect a strategy which is positively prepared and fully justified.	Not stated	No	No	All urban fringe locations on the edge of the Black Country are Green Belt locations. The strategy focuses Green Belt release on the districts most sustainable Tier 1 settlement within walking distance of rail access. The broad location of the urban fringe of the Black Country does not offer the level of public transport, particularly to employment centres in the district and surrounding areas, which are present in the District's Tier 1 settlements and are therefore not considered to be well served by public transport, relying on limited bus services to access higher order services.
Turley Associates for Bellway Homes Ltd (Kinver)	AGT24-042-01-02	Policy DS5	<p>Kinver - Please refer to our previous representations made in December 2022 on this matter at Appendix 1. The policy sets out that growth will be directed towards the most accessible and sustainable locations. Kinver is identified as a 'Tier 2 Settlement' – details of Kinver are in paragraphs 3.23 and 3.24 of the full representation. The Spatial Strategy limits the growth of Tier 2 settlements, this is not considered reflective of the inherent sustainability of Kinver which have been disproportionately restricted by the updated Publication Plan.</p> <p>Kinver - The omission of Hyde Lane, Kinver is in part a misinterpretation of the NPPF. Kinver benefits from a range of services and is highly accessible. There are proposed allocations in Kinver and Wombourne which have been identified as sustainable locations for development. Therefore, it is considered that these settlements could provide further growth for the District.</p>	No	No	No	<p>The use of access to employment (utilising the Hansen scores) as factor in determining the tiers of villages is considered appropriate given that commuting is one of the main reasons for travel and lying within a tier 1 village gives residents direct access to Birmingham, the region's main employment (and retail/leisure) centre via a sustainable transport mode. As referenced in our Spatial Strategy Topic Paper 2024, recent research suggests that there is a pattern of continued decline in the frequency of bus services both within South Staffordshire and neighbouring authorities, with the frequency of bus services declining 57% across the district since 2010. Therefore, areas of the district outside of Tier 1 settlements entirely reliant on bus services for sustainably accessing employment may not necessarily be able to rely on those services going forward.</p> <p>Focusing green belt release at the most sustainable Tier 1 locations is consistent with the NPPF requirement to give first consideration to land which is well served by public transport, and therefore representing an appropriate strategy.</p>
Turley Associates for Bellway Homes Ltd	AGT24-042-01-04	Policy DS5	Wombourne - Please refer to our previous representations made in December 2022 on this matter at Appendix 1. The policy sets out that growth will be directed towards the most accessible and sustainable locations. Wombourne is identified as a 'Tier 2 Settlement' – details of Wombourne are in paragraphs 3.13 and 3.14 of the full representation. The Spatial Strategy limits the growth of Tier 2 settlements, this is not considered reflective of the inherent sustainability of Wombourne which have been disproportionately restricted by the updated Publication Plan.	No	No	No	Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							<p>Focusing green belt release at the most sustainable Tier 1 locations is consistent with the NPPF requirement to give first consideration to land which is well served by public transport, and therefore representing an appropriate strategy.</p> <p>Wombourne will still receive a sizeable level of growth without Green Belt release proposed.</p>
Savills UK Ltd for Barratt Homes	AGT24-038-01-02	Policy DS5	<p>We object to DS5. Paragraph 5.13 states that SSDC has tested further spatial strategy options. Option I was not previously consulted on or identified as a preferred option in the 2022 Publication Plan. The PPG requires a Sustainability Appraisal and we do not consider that sufficient justification has been provided for pursuing Option I rather than pursuing Option G. Option I appears to have been 'created' by the Council in order to achieve their interpretation of the amended NPPF and support the reduction in housing. SSDC has produced evidence in order to support their unjustified desire to deliver less housing, rather than evidence informing the strategy.</p> <p>In the adopted Core Strategy, the settlements of Kinver, Perton, Wombourne and Brewood are identified as 'main service villages'. These have been re-categorised to Tier 2 settlements where growth and release of Green Belt is restricted. This approach will limit growth and constrain their potential to deliver more services.</p> <p>Barratt strongly object to the assessment of Kinver as a Tier 2 settlement, and to the proposed Rural Settlement Hierarchy. Kinver should remain a 'main service village' as it is a sustainable settlement capable of supporting significant growth. Evidence to support Kinver being a 'main service village' or Tier 1 settlement can be found in the full representation.</p> <p>SSDC claim Option I directs growth towards sustainable non-Green Belt development sites. SSDC have not provided justification on the reasonable alternatives assessed around the Tier 1 settlements for the HMA contribution and why the proposed capacity is limited to 640 dwellings. There are dismissed sites which perform comparatively to the sites proposed to be allocated (examples given in the full representation). There is inconsistency with how Option I has been applied to Green Belt sites. The Spatial Strategy should be amended to reflect a strategy which is positively prepared and fully justified.</p>	Not stated	No	Not stated	<p>Whilst the Sustainability Appraisal should inform the Local Plan it does not in itself make strategy or site-specific decisions. Notwithstanding this, the SA does assess Option I alongside other spatial distribution options and does conclude that on the whole Option I could be identified as the preferable option, although it is acknowledged that most the spatial options perform similarly in SA terms. The Council's Spatial Housing Strategy 2024 has considered the merits of spatial options in more detail when arriving at Option I as the preferred option.</p> <p>The identification of the different tiers is evidenced and justified in the Rural Services and Facilities Audit 2021. The use of access to employment (utilising the Hansen scores) as factor in determining the tiers of villages is considered appropriate given that commuting is one of the main reasons for travel and lying within a tier 1 village gives residents direct access to Birmingham, the region's main employment (and retail/leisure) centre via a sustainable transport mode. As referenced in our Spatial Strategy Topic Paper 2024, recent research suggests that there is a pattern of continued decline in the frequency of bus services both within South Staffordshire and neighbouring authorities, with the frequency of bus services declining 57% across the district since 2010. Therefore, areas of the district outside of Tier 1 settlements entirely reliant on bus services for sustainably accessing employment may not necessarily be able to rely on those services going forward.</p> <p>All 'potentially suitable' sites in the Council's SHELAA have been assessed as reasonable alternatives, including those adjoining a village development boundary or where the site is a short distance from the host settlement and a</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							legible and safe pedestrian route and means of access to the host settlement can be demonstrated, including site suggestions around Tier 1 settlements.
Zesta Planning for Completelink Ltd	AGT24-046-01-03	Policy DS5	<p>Policy DS5 does not set out a strategy for meeting the evidenced needs for specialist housing and registered care. The Council's 'Homes for Older People and Disabled People Topic Paper' discusses the ways in which the Publication Plan is responding to the evidenced needs in paragraphs 3.3 and 3.4. Three sites are identified for specialist elderly housing, indicating a very substantial unmet need for specialist housing over the plan period. No clear justification is provided by the Council for their approach of not addressing the need for specialist housing.</p> <p>Whilst the plan does allocate a range of smaller sites, these are all for general housing with no specific policy allocation for specialist housing. Instead, the plan relies of these sites being delivered in accordance with its 'housing mix'. It is considered that lower levels of specialist housing will be delivered on the non-strategic sites allocated in Policy SA3. It is clear the Council does not have a realistic plan in place for addressing the substantial need for specialist housing.</p> <p>There is no assessment of the potential to allocate sites in Tier 3 or Tier 4 settlements or importantly to expand established existing specialist accommodation sites, such as Prestwood House Care Home &amp; Estate. The conclusion seems to be that older people will automatically seek care provision in their existing village. The Publication Plan does not provide a suitable strategy for meeting the evidenced needs for specialist housing and registered care spaces over the plan period and results in a very substantial unmet need. Whilst some of this would be meet by non-strategic site allocations, it is clear these cannot provide anywhere near the identified shortfall. As such, it is not positively prepared and not consistent with national policy. Proposed amendments to the policy to make it 'sound' can be found in paragraphs 2.42 – 2.48 of the full representation.</p>	Not stated	No	Not stated	<p>Allocations for specialist housing are being made in the Local Plan, as set out in the Homes for Older and Disabled People Topic Paper. The Council considers that this, in combination with the positive wording of Policy HC5 to encourage and support the provision of specialist housing developments, is sufficient contribution to meeting need. The Council also will continue to work proactively with the County Council and Registered Providers to explore opportunities for new provision. The Council is confident that this combination of approaches will deliver sufficient levels of appropriate housing to meet the needs of older and disabled people over the plan period.</p> <p>In relation to the location of specialist housing, the PPG states that factors to consider include the proximity of sites to good public transport, local amenities, health services and town centres. It is also important to consider the presence of existing support networks. The Council therefore considers the approach taken is appropriate and consistent with national guidance.</p> <p>No change proposed.</p>
Bruton Knowles	AGT24-007-01-02	Policy DS5	<p>LATE SUBMISSION The reduction in housing numbers proposed to contribute towards the GBBCHMA is considered unjustified.</p>	Not stated	Not stated	Not stated	<p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).
Marrons Planning for L&Q Estates	AGT24-027-03-03	Policy DS5	Objection to draft Policy DS5 is made to the Council's approach to ignoring growth adjacent to the urban edge of Wolverhampton, including in recognition of the SSLPR's contribution to assisting to meet the unmet needs of the GBBCHMA. As drafted, we consider Policy DS5 is not positively prepared, justified, effective nor consistent with national policy and therefore cannot be considered sound in line with the NPPF. The Spatial Strategy fails to recognise that there are locations in South Staffordshire on the edge of adjacent urban conurbations which are highly sustainable and will deliver a more appropriate pattern of growth. Consider that the substantial unmet needs arising from the GBBCHMA represent cogent exceptional circumstances for Green Belt boundary amendments.	Yes	No	Yes	All urban fringe locations on the edge of the Black Country are Green Belt locations. The strategy focuses Green Belt release on the districts most sustainable Tier 1 settlement within walking distance of rail access. The broad location of the urban fringe of the Black Country does not offer the level of public transport, particularly to employment centres in the district and surrounding areas, which are present in the District's Tier 1 settlements and are therefore not considered to be well served by public transport, relying on limited bus services to access higher order services.
Johnson, E	RES24-119-01	Policy DS5	Support the plan because the countryside green areas are in constant demand and restrictions on encroachment upon them with major development must be adhered to at all costs. Protection of Green Belt land is a priority for us and future generations. Many issues including flooding increase to development. If restriction of unnecessary development is not done there will be a major impact in wildlife and ecology.	Yes	Yes	Yes	Support noted.
Smith, K	RES24-219-01	Policy DS5	Support distribution of development to most sustainable locations, protecting the Greenbelt.	Not stated	Not stated	Not stated	Support noted.
Marrons Planning for Boningale Homes	AGT24-027-02-01	Policy DS5	Boningale Homes is supportive of the settlement hierarchy and particularly the identification of Codsall as a tier 1 settlement and Brewood as a tier 2 settlement. We submit that further growth should be allocated to the tier 1 and tier 2 settlements to ensure the housing need figure. Whilst an approach to the appropriate use of brownfield and previously developed land is supported, with regard to wider regeneration aspirations however realistic timeframes have to be considered when projecting completions from such sites.  With specific regard to meeting rural housing needs, we do not believe that the Council's approach to the development needs of the Rural Area adequately reflects best practice. Despite evidence of need in the rural area, there is very limited scope provided for additional development in rural parts of the District beyond committed and allocated development. Planning new homes in suitable rural settlements, such as Bishops Wood, has an important role in ensuring the long-term vitality, vibrancy and sustainability of rural communities.	Not stated	No	Not stated	Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.  The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).  Development in Tier 4 settlements is limited to "very limited windfall housing growth to assist in safeguarding the limited services and facilities in



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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			Consider that a greater level of development should be directed towards the rural settlements in South Staffordshire, whilst noting the clear benefits of directing the majority of growth in tier 1 and tier 2 settlements to ensure that the aims set out above are delivered.				each village and to address local housing needs”, in accordance with Policy DS5.  Given the limited services and facilities available in these settlements and their lack of sustainability credentials (as evidenced by our Rural Services and Facilities Audit 2021), it is not considered appropriate to allocate sites at these settlements.
Berrys for Bradford Estates	AGT24-006-01-02	Policy DS5	LATE SUBMISSION - The spatial strategy for housing provides a very low level of growth to Tier 4 and Tier 5 settlements (at 0.3% and 2.6% of the total level of housing respectively). Such a level of growth in Tier 4 and 5 settlements is considered to be inappropriate as it fails to recognise the sustainability of these settlements, their ability to accommodate growth or the need for growth in these settlements to meet the Plan’s objectives of providing housing to meet the needs of different groups in the community or to protect and enhance sustainable village centres. Highlights errors with the scoring of settlements in Appendix 4 of the Rural Services and Facilities Audit including that Weston-under-Lizard has a bus service and Blyhill village hall has a number of uses. We would also stress enabling rural communities to become more sustainable and thrive as living and working communities requires investment from both public and private sources. Sensitively designed development that reflects the needs of the local community and contributes towards much needed infrastructure and homes for local people has an important role to play in reinvigorating rural communities.  Accordingly Policy DS5 should take a more permissive approach to rural housing to rebalance rural communities.	Yes	No	Yes	Development in Tier 4 settlements is limited to “very limited windfall housing growth to assist in safeguarding the limited services and facilities in each village and to address local housing needs”, in accordance with Policy DS5.  Given the limited services and facilities available in these settlements and their lack of sustainability credentials (as evidenced by our Rural Services and Facilities Audit 2021), it is not considered appropriate to allocate sites at these settlements.  It is not considered that directing development to Tier 5 settlements would increase their sustainability as there are no existing facilities to sustain. Instead, it would lead to more unsustainable transport movements.
Pegasus Group for Clowes Developments Ltd	AGT24-031-02-01	Policy DS5	SSDC’s preferred spatial strategy, Option I, focuses growth to sustainable non-Green Belt locations alongside limited Green Belt allocations in Tier 1 settlements. The Plan relies upon the delivery of over a third of the district’s housing on the large strategic allocations. Larger sites will typically have longer lead in times, which is reflected in the Indicative Housing Trajectory with completions falling significantly short of local housing need in the period through to 2028. Contributing a larger proportion of homes to the unmet needs would assist in improving the affordability of homes.	Not stated	No	No	The Council has included a buffer in housing supply above its proposed requirement which will provide around 10% plan flexibility (as set out in Policy DS4) to allow for any uncertainties around site delivery. It has worked proactively with site promoters and infrastructure providers on its two strategic allocations (Policies SA1-2) to masterplan the sites and create greater certainty over site delivery. The vast majority of sites in the plan are unconstrained greenfield sites and the Council has a very strong track record of delivering major schemes, with only two full applications lapsing over a period of 27 years (1996-2023) as detailed further on our Housing Monitoring and Five-Year Land Supply 2022-2023

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							document. Given the mix of sites proposed in the plan, the Council therefore consider the 10% plan flexibility to be appropriate.
Pegasus Group for Clowes Developments Ltd	AGT24-031-02-02	Policy DS5	<p>The role the district plays in the wider GBBCHMA and FEMA must be emphasised further within the wording of DS5. Spatial Strategy Option I currently fails to reflect the district's relationship with the adjoining areas of Dudley and Wolverhampton. It should place greater emphasis on housing growth along the eastern edge of the district. It is acknowledged in the evidence base that Tier 2 and 3 settlements can also accommodate housing growth, whilst this may require the release of Green Belt land, carefully considered layouts can enhance setting through appropriate compensatory measures. It is important that over reliance on brownfield sites does not result in an overprovision of development unable to meet a range of needs.</p> <p>Windfall development comprises 600 homes. Historic windfall delivery rates have been based on historic permissions to achieve a capacity of 35dph. These developments were based on less onerous policy provisions which did not require the delivery of 10% BNG, NDSS or M4(2)/M4(3) compliant homes. The strategy also fails to address affordability concerns, stating that affordable housing could be reduced to below 30% if viability is an issue.</p> <p>DS5 is currently considered unsound and is not justified based on proportionate evidence nor positively prepared. It is considered that additional housing allocations capable of accommodating housing needs in sustainable locations accessible to public transport should be delivered.</p>	Not stated	No	No	<p>All urban fringe locations on the edge of the Black Country are Green Belt locations. The strategy focuses Green Belt release on the districts most sustainable Tier 1 settlement within walking distance of rail access. The broad location of the urban fringe of the Black Country does not offer the level of public transport, particularly to employment centres in the district and surrounding areas, which are present in the District's Tier 1 settlements and are therefore not considered to be well served by public transport, relying on limited bus services to access higher order services.</p> <p>The use of access to employment (utilising the Hansen scores) as factor in determining the tiers of villages is considered appropriate given that commuting is one of the main reasons for travel and lying within a tier 1 village gives residents direct access to Birmingham, the region's main employment (and retail/leisure) centre via a sustainable transport mode. As referenced in our Spatial Strategy Topic Paper 2024, recent research suggests that there is a pattern of continued decline in the frequency of bus services both within South Staffordshire and neighbouring authorities, with the frequency of bus services declining 57% across the district since 2010. Therefore, areas of the district outside of Tier 1 settlements entirely reliant on bus services for sustainably accessing employment may not necessarily be able to rely on those services going forward.</p> <p>Focusing green belt release at the most sustainable Tier 1 locations is consistent with the NPPF requirement to give first consideration to land which is well served by public transport, and therefore representing an appropriate strategy.</p> <p>The windfall allowance of 40 dwellings per annum is evidenced and justified in the SHELAA (2024), with a conservative approach taken to setting this allowance.</p>
Pegasus Group for	AGT24-	Policy	SSDC's preferred spatial strategy, Option I, focuses growth to	Yes	No	Not stated	The spatial strategy does provide a balanced

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
St Philips	032-07-02	DS5	sustainable non-Green Belt locations alongside limited Green Belt allocations in Tier 1 settlements. Whilst support is given within the Plan to the delivery of housing allocations, it is important that DS5 recognises that a range of housing allocation sites will be required to deliver balanced housing growth across the district and GBBCHMA.				approach to growth with allocations in Tier 1-3 settlements whilst also allowing for limited windfall growth at lower tier settlements.
Pegasus Group for St Philips	AGT24-032-07-02	Policy DS5	<p>Contributing a larger proportion of homes to the unmet needs of the GBBCHMA would improve the affordability of homes and in turn support existing services. The role the district plays in the wider GBBCHMA and FEMA must be emphasised further within the wording of DS5. Spatial Strategy Option I currently fails to reflect the district's relationship with the adjoining areas of Walsall and Wolverhampton. Although the importance of brownfield land is acknowledged as part of a balanced housing strategy, it is important that over reliance on these sites does not result in an overprovision of development unable to meet a range of needs, reduced affordable housing, compromising the existing landscape character of village settlements.</p> <p>Windfall development comprises 600 homes. Historic windfall delivery rates have been based on historic permissions to achieve a capacity of 35dph. These developments were based on less onerous policy provisions which did not require the delivery of 10% BNG, NDSS or M4(2)/M4(3) compliant homes. The strategy also fails to address affordability concerns, stating that affordable housing could be reduced to below 30% if viability is an issue. In addition, it would appear that windfall sites have been double counted, with the Indicative Growth Table for Option I on which the housing delivery figures for the Plan have been based including windfall allowance.</p> <p>DS5 is currently considered unsound and is not justified based on proportionate evidence nor positively prepared. It is considered that additional housing allocations capable of accommodating housing needs in sustainable locations accessible to public transport should be delivered.</p>	Yes	No	Not stated	<p>The Plan proposes to contribute circa 640 dwellings in line with the preferred capacity based spatial strategy. There is no evidence that increasing the number of homes would improve affordability.</p> <p>The role the district plays within the GBBCHMA and FEMA is covered in the supporting text of the plan, and it is not considered necessary to refer to these in Policy DS5, which focuses on the distribution of new development.</p> <p>The spatial strategy does provide a balanced approach to growth with allocations in Tier 1-3 settlements whilst also allowing for limited windfall growth at lower tier settlements.</p> <p>The windfall allowance of 40 dwellings per annum is evidenced and justified in the SHELAA (2024), with a conservative approach taken to setting this allowance.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p>
CPRE Staffordshire	STA24-013-04	Policy DS5	Object to the proposed site (036c) adjacent to the town of Stafford. The site has previously been refused planning permission, the site is poorly related to the settlements in South Staffordshire nor would it serve the needs of the Black Country.	Not stated	No	No	The refusal of planning permission historically does not preclude a site from being proposed for allocation. Like all sites proposed for residential allocation, site 036c has been assessed in the

**CHAPTER 5 & POLICIES DS1-DS5: DEVELOPMENT STRATEGY AND SUPPORTING TEXT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			South Staffordshire is over-allocating sites compared to local need. Greenfield sites such as 036c are not required to meet the local housing need. No tenable reason has been advanced to justify this allocation.				<p>round against a consistent set of planning criteria in order to determine those that better perform as sustainable allocations. The council considers that all proposed allocations comply with the NPPF and the spatial strategy (identified in Policy DS5) insofar as they are located to deliver sustainable patterns of development that meet the authorities' identified housing need.</p> <p>Albeit as relatively smaller proposed allocation, site 036c will still contribute to the meeting the housing needs of South Staffordshire alongside the other residential allocations in the plan. This includes a contribution to unmet needs of neighbouring authorities. The evidence demonstrates that the whole of the district is within the GBBCHMA and in reality, sites may be providing homes for both South Staffordshire residents and residents of neighbouring areas, and so it is not considered necessary to breakdown the contribution by site.</p> <p>As set out in the Housing Site Selection Topic Paper 2022, there is very limited available brownfield land located within the district, and not enough to meet the district's housing requirement in full. Where brownfield site opportunities are available, these have been included within the Local Plan. However, the proposed allocation of greenfield (both Green Belt and Open Countryside) sites is necessary to contribute to the district's housing requirement.</p> <p>No change proposed.</p>
Pegasus Group for Persimmon Homes	AGT24-032-04-01	Policy DS5	Persimmon Homes support the Council's strategy is DS5 to distribute growth to sustainable locations, particularly Tier 1 settlements such as Penkridge. The identification of Penkridge as a Tier 1 settlement is welcomed. Land at Cherrybrook Drive offers the opportunity to deliver much needed market and affordable homes consistent with the spatial strategy.	Not stated	No	Not stated	Support noted.
Grainger, P	RES24-087-03	Policy DS5	Site 036c This development will be completely disconnected from Acton Trussell. In fact, the failed application submitted by Gladman Development never noted the area as being in Acton Trussell and always suggested it was South Stafford. With the numbers now suggested this cannot be considered as strategic. It only accounts for 1.6% of the total plan, whilst 11% of the total is forecast from windfall dwellings.	No	No	Not stated	The refusal of planning permission historically does not preclude a site from being proposed for allocation. Like all sites proposed for residential allocation, site 036c has been assessed in the round against a consistent set of planning criteria in order to determine those that better perform as sustainable allocations.

**CHAPTER 5 & POLICIES DS1-DS5: DEVELOPMENT STRATEGY AND SUPPORTING TEXT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							Albeit as a relatively smaller proposed allocation, site 036c will still contribute to meeting the housing needs of South Staffordshire alongside the other residential allocations in the plan. This includes a contribution to unmet needs of neighbouring authorities and 10% plan flexibility (as set out in Policy DS4) to allow for any uncertainties around site delivery.  No change proposed.
Gilbert, R	RES24-082-01	Policy DS5	Believes future development around Laney Green would solve some of its issues around anti-social behaviour and fly tipping.	Not stated	Not stated	Not stated	Laney Green is a rural location that falls within 'the district's wider rural area' under Policy DS5 and is not considered a sustainable location for development.
Johnston, P	RES24-121-02	Policy DS5	<p>Site 036c The land is within the SAC of the Cannock Chase AONB. There is no evidence in the Plan that this has been taken into account. This conflicts with the SAC Guidance to mitigate the impact of new residential development (March 2022).</p> <p>Policy EQ2: 'Development will only be permitted where it can be demonstrated that it will not be likely to lead directly or indirectly to an adverse effect upon the integrity of the Cannock Chase Special Area of Conservation (SAC).' The site 036c is an important part of the continuity of Open Countryside between Cannock Chase AONB and the important Valley of the River Penk. Mitigation, as permitted in the SAC will be unable to mitigate the impact on wildlife movements between these important sites South of Stafford.</p>	No	No	No	<p>Site 036c has been assessed in the round against a consistent set of planning criteria – including SAC constraints – in order to determine those that better perform as sustainable allocations. Development in locations to the northeast of the district towards Cannock Chase National Landscape, have the potential to have a negative effect on the character and/or setting of the National Landscape and SAC. Any future planning application would be expected to address Policies NB3 and NB4 insofar as they must have no adverse effect upon the integrity of the SAC, alongside conserving and enhancing the landscape and scenic beauty of the area and conform with the most up to date SPDs.</p> <p>The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact on habitats sites.</p> <p>No change proposed.</p>
Kelly, G	RES24-128-01	Policy DS5	Support decision for no development at Bishops Wood Plan must protect environment and keep the village a village.	Not stated	Not stated	Not stated	Comments noted.
Mann, J	RES24-139-01	Policy DS5	I would like to register my support for the current plan.	Not stated	Not stated	Not stated	Support noted.



**CHAPTER 5 & POLICIES DS1-DS5: DEVELOPMENT STRATEGY AND SUPPORTING TEXT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
Jones, C & J	RES24-124-02	Policy DS5	Site 036c There is a surplus of houses to be built under this local plan and there is no infrastructure to feasibly support development in this part of the district. In this area, facilities are only available to Stafford borough and are oversubscribed. Travel to main employments sites from this development would be difficult and cause extra strain on the roads. The development would benefit nobody	No	No	No	Any oversupply that may have been delivered by Stafford is not a relevant consideration when preparing the plan for South Staffordshire as it is a different HMA.  Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies. Engagement throughout plan preparation has taken place with Local Highways Authority, School Organisation Team (SOT) (both Staffordshire County Council), and Staffordshire and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical Commissioning Group). None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities, or addressed through proposed Policies HC14, and HC15.  No change proposed.
Lichfields for Taylor Wimpey	AGT24-026-03-03	Policy DS5	Details on the revised spatial strategy can be found in paragraphs 2.38 – 2.42 of the full representation. The land at Clent View Road site has not been allocated for development in either the 2022 or 2024 publication plan. Whilst the Council has outlined its justification for pursuing the preferred spatial strategy, a central tenet of the approach is that the quantum of the GBBCHMA unmet need is unknown and consequently a small contribution is acceptable. It is clear the unmet needs of the GBBCHMA exceed 100,000 dwellings and the Council should not defer this matter to a later date. The release of Green Belt land to help address the unmet need is entirely consistent with the NPPF. It is not compliant with national policy to release only those sites which perform the worst against the Green Belt purposes. There is a need to consider the broader Green Belt policies within the NPPF as a whole.	Not stated	No	Not stated	Justification for the council’s spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district’s growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan’s ability to deliver housing growth.  The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council’s Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).
Lichfields for Taylor Wimpey	AGT24-026-03-03	Policy DS5	Taylor Wimpey considers that the revised spatial strategy is overly contrived and has been designed to lower the housing requirement and to limit Green Belt release. The previous spatial strategy was considered to be sustainable, as demonstrated by the evidence base which underpinned the PP 2022. Taylor Wimpey strongly encourage the Council to release further Green Belt through the Local Plan review to address the unmet need of the GBBCHMA and should allocate growth on the western edge of the Black Country, specifically the west border of Stourbridge. Stourbridge is sustainably located and provides access to a variety of existing services, facilities and employment	Not stated	No	Not stated	Justification for the council’s spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district’s growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan’s ability to deliver housing growth.  The housing target (incorporating the 640-home

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>opportunities. Taylor Wimpey considers that development on the edge of Dudley should be supported given the functional relationship between South Staffordshire and Dudley.</p> <p>It is clear that the Council will need to release further housing land, either to address the GBBCHMA's or District's needs. There are limited options for meeting these long-term needs outside of the Green Belt and very likely that the Council will against need to revisit releasing GB land in due course. Identification of additional safeguarded land will ensure GB boundaries will not need to be altered at the end of the plan period.</p>				<p>contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>All urban fringe locations on the edge of the Black Country are Green Belt locations. The strategy focuses Green Belt release on the districts most sustainable Tier 1 settlement within walking distance of rail access. The broad location of the urban fringe of the Black Country does not offer the level of public transport, particularly to employment centres in the district and surrounding areas, which are present in the District's Tier 1 settlements and are therefore not considered to be well served by public transport, relying on limited bus services to access higher order services.</p> <p>The Council considers that it would be inappropriate to release additional land from the Green Belt for safeguarded land through this Local Plan, given the need for any such release to be justified by exceptional circumstances.</p> <p>It is acknowledged that the approach to future Green Belt release will be considered through an updated Strategic Growth Study across the GBBCHMA which South Staffordshire will be an active partner in, and it is right to consider this issue strategically across this wider functional geography. To date, no GBBCHMA authority has requested that South Staffordshire provide additional safeguarded land for longer term unmet needs, nor has this been required in recent examinations in the GBBCHMA. Given these factors and the requirement in national policy to review the plan in whole or in part every 5 years, it is not considered appropriate or necessary to release safeguarded land at this stage.</p>

**CHAPTER 5 & POLICIES DS1-DS5: DEVELOPMENT STRATEGY AND SUPPORTING TEXT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
Monnox, P	RES24-152-02	Policy DS5	<p>The location of 036c on the southern edge of Stafford (A34 corridor) is not justified. This is an excess provision, in the wrong location and does not comply with NPPF so therefore it is not legal. The proposed site, and the adjoining land, has been identified by consultants advising the Council as being of "High" landscape sensitivity. The reduction in the extent of the proposal, from that which was previously put forward, to 81 houses does not negate this high landscape sensitivity finding and therefore major negative impacts are anticipated. This proposal will be visually obtrusive from local views (from both the A34 and Wildwood Drive) and from Cannock Chase AONB to the east and southeast. Also, there would be no clear or defensible southern boundary to the development. This is an arbitrary line across the field with no physical features. It would be expected that if site 036c is permitted by the Inspectorate, the developers will then press for additional housing to be built at the same time. This land is "open countryside, productive farming land (Grade 3a) and the National regulations require that building on such land is minimised. It is a wildlife corridor between the AONB and the Valley of the River Penk.</p>	No	No	No	<p>The council considers that all proposed allocations comply with the NPPF and the spatial strategy (identified in Policy DS5) insofar as they are located to deliver sustainable patterns of development that meet the authorities' identified housing need.</p> <p>Landscape sensitivity has been assessed through the Landscape Sensitivity Study. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that better perform as sustainable allocations. Any future planning application would be expected to address Policy NB4 – which the council has included as a proposed policy in the plan – insofar as the design and location of new development should take account of the characteristics and sensitivity of the landscape and its surroundings, including not having a detrimental impact upon any medium or long-distance views.</p> <p>The proposed allocation of the low-lying, northern portion of the wider site is designed to overcome issues with the southern portion and its impact upon the historic environment. The council considers that these site-specific issues will prevent any future development to the south of the proposed allocation.</p> <p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district's agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p> <p>The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							required an appropriate assessment based upon their impact on habitats sites.  No change proposed.
Monnox, D	RES24-151-02	Policy DS5	The location of 036c on the southern edge of Stafford (A34 corridor) is not justified. This is an excess provision, in the wrong location and does not comply with NPPF so therefore it is not legal. The proposed site, and the adjoining land, has been identified by consultants advising the Council as being of "High" landscape sensitivity. The reduction in the extent of the proposal, from that which was previously put forward, to 81 houses does not negate this high landscape sensitivity finding and therefore major negative impacts are anticipated. This proposal will be visually obtrusive from local views (from both the A34 and Wildwood Drive) and from Cannock Chase AONB to the east and southeast. Also, there would be no clear or defensible southern boundary to the development. This is an arbitrary line across the field with no physical features. It would be expected that if site 036c is permitted by the Inspectorate, the developers will then press for additional housing to be built at the same time. This land is "open countryside, productive farming land (Grade 3a) and the National regulations require that building on such land is minimised. It is a wildlife corridor between the AONB and the Valley of the River Penk.	No	No	No	Response as above.  No change proposed.
Readshaw, S	RES24-193-01	Policy DS5	Local plan is legally compliant and sound. Council should follow the revised NPPF and include climate change strategy within the strategic planning responsibilities. Suitable brownfield sites should be prioritised for development.	Yes	Yes	Yes	Support noted.  The plan does have climate change mitigation at its heart and has identified all suitable brownfield site options through its site selection process.
Stroud, J	RES24-223-01	Policy DS5	South Staffordshire (SS) Climate Change Strategy should relate to its strategic planning responsibilities. SS, in line with the NPPF (2023), should place climate change and mitigating its impact at the centre of their policy making. The Local Plan should focus on development and required infrastructure in areas that would impact the local community and environment least. Tier 1 villages are assessed as having the greatest access to services and facilities relative to other settlements, with Tier 4 settlements the lowest. Tier 5 villages including Lower Penn, have no access to services and facilities and are, therefore, unsuitable for development. SS should allocate suitable brownfield sites first and foremost and ensure that neighbouring authorities are doing likewise.	Not stated	Not stated	Not stated	The plan does have climate change mitigation at its heart and has identified all suitable brownfield site options through its site selection process.

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
Roberts, M	RES24-198-01	Policy DS5	Support the local plan. Good that there is no development on the green belt agricultural land near Bishops Wood. Should be reducing reliance on imported food.	Yes	Yes	Yes	Support noted.
Sen, A for the Save the Seven Cornfields Campaign Group (SSCCG)	RES24-203-01	Policy DS5	SSCCG & Penn Residents Association (PRA) object to the continued poor quality and lack of universal objectivity of the evidence and forecasting base. The lack of presentation of assumption and testing of assumptions is another concern. Furthermore, given the overall evidence and success of a 'brownfield first' strategy in the West Midlands Combined Authority and the Black Country areas, we are compelled to raise the issue about the lack of monitoring and review of brownfield developments in the West Midlands Combined Authority and Black Country and the form and scope of data and information presentation of the Plan being used by the Local Planning Authority to support Local Plan preparation. During the Local Plan preparation period from beginning to present time, the Brownfield site reclamation for housing has been significantly different. This in itself reduces the extent of the Duty to Cooperate. This type of development best suits first time buyers who normally can ill afford the luxury of a car to commute to employment or public transport hubs. Green Belt development is very rarely suitable for first time buyers. The plan is, therefore, not promoting the most environmentally sustainable and inclusive perspective. It conflicts with the 'Sustainability' test of 'Soundness' for Local Plan preparation as stated within paragraph 35 (d) of the Revised NPPF (December 2023). In summary the South Staffordshire Local Plan: Has not been Positively Prepared. The Housing forecast aggregate numbers are questionable. These are presented as Objective, unquestionably valid and foundational. In fact, these are highly subjective and, therefore, the release of the Green Belt is Not Justified as reasonable and logically proved. The SSLP is inconsistent with National Policy.	Not stated	No	No	The district's Local Housing Need (LHN) figure is based upon the Government's standard method formula and is considered appropriate. The exceptional circumstances for Green Belt release is detailed in the Council's Exceptional Circumstances Topic Paper (2024). This includes the approach of maximising suitable brownfield and other non-Green Belt sites, with these considered through the SHELAA (2024) and Housing Site Assessment Topic Paper (2024).
Smith, P	RES24-220-01	Policy DS5	Plots 523 119a 730,136, 139,638,704.536a, 141 The plan is not justified because of the following: Destroy our villages green spaces Destroy the character of the area Infrastructure will continue to deteriorate Cheslyn Hay and Great Wyrley are being unfairly targeted for development Plan is not consistent with national policy for transport, healthcare and education provision Will increase pollution and household waste	Not stated	Not stated	Not stated	The Council's Rural Services and Facilities Audit (2021) identifies Cheslyn Hay and Great Wyrley as some of the district's most sustainable locations and Tier 1 settlements. Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024. The plan includes strong design (Policy HC10), open space (Policy HC17), education (Policy HC15) and health (Policy HC14) policies to ensure that new development is of high quality and delivers the necessary infrastructure.  No change proposed.



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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
Stonehouse, C	RES24-222-01	Policy DS5	<p>There is no balance in the allocation of land to the South of Stafford, and ill intrude on the buffer of countryside between Brocton and Acton Trussell.</p> <p>No need for future commercial development at site E30</p> <p>The development site proposed for Penkridge is disproportionate to the growth of Penkridge</p> <p>SSDC have missed an opportunity to include a proposal to create an alternative route across the river and the flood plain for a footpath to the village centre.</p> <p>New school not required in Penkridge</p>	Not stated	Not stated	Not stated	<p>The site south of Stafford has been assessed as suitable having regard to a number of different factors. Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>Land north of Penkridge is considered a proportionate allocation for Penkridge given its status as a Tier 1 settlement and the sites credentials as a non-Green Belt site in a sustainable location. The development north of Penkridge is at a scale to require a new first school as confirmed by the education authority. It is not currently considered deliverable to provide a new pedestrian route over the River Penk, as land to the south of the river is in a different land ownership. Indicative access arrangements set out in the concept plan are considered appropriate.</p> <p>The proposed allocation at M6, Junction 13 has been proposed for allocation based on a balanced judgement having regard to a number of considerations and covered in our Economic Strategy and Site Assessment Topic Paper 2024. These include site specific credentials and that it is the only significant site that has been put forward at a key motorway junction in the district on land outside of the Green Belt; shortfalls of employment land in the wider FEMA; and regional evidence of strong demand. Allocating M6 Junction to compliment other sites in the pipeline ensures a strategy that positively and proactively encourages sustainable economic growth.</p>
Wharton, J	RES24-249-01	Policy DS5	<p>Support the local plan as it is crucial to reduce urban sprawl and maintain the countryside.</p> <p>The plan is in line with the national policy</p>	Yes	Yes	Yes	Support noted.

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
Home Builders Federation	STA24-024-02	Policy DS5	<p>Policy DS5 is unsound because it is not effective or justified and does not comply with national policy.</p> <p>As HBF believes the housing requirement for the South Staffordshire Plan should be higher and a greater contribution should be made to meeting the wider housing needs of the HMA and are of the view that the spatial strategy needs to be reviewed and expanded to enable additional housing allocations. This is likely to include the need for further green belt release. HBF believes the plan period needs to be extended for the plan to confirm with national policy, as such this paragraph will need updating to reflect the new longer plan period.</p>	No	No	No	<p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>The Council considers that adoption by early 2026 to be ambitious by realistic. It is accepted that if this is not the case then it will impact on the end of the plan period.</p>
Brewood Civic Society	STA24-008-04	Policy DS5	Brewood Civic Society supports Policy DS5 – The Spatial Strategy to 2041. Our Tier 2 settlement has an allocation of a minimum of 63 houses on safeguarded land and the possibility of windfall sites. All of this development is to be non-Green Belt site allocations.	Not stated	Not stated	Not stated	Comments noted.
Penrose, L	RES24-176-01	Policy DS5	The tiered approach championed by the RSFA stymies opportunities to deliver new homes and leaves the Council unnecessarily hamstrung as a result. The Council is missing opportunities for, albeit modest levels of new housing development, within defined settlement boundaries and the allocation of settlements within the suggested lower Tiers (4 and 5) in particular warrants reconsideration and reappraisal, which goes beyond the out-dated limitations of the RSFA. By doing so, Acton Trussell in particular should be reallocated as a Tier 4 settlement.	Yes	No	No	<p>The Rural Services and Facilities Audit 2021 informs the spatial strategy set out in Policy DS5. It is considered that this takes a balanced approach that will lead to a sustainable pattern of development by focusing growth of the district's most sustainable Tier 1 settlements. The strategic approach does still allow for limited development in lower Tier 4 and 5 settlements, including limited affordable housing.</p> <p>No change proposed.</p>
Talbot, R	RES24-230-05	Policy DS5	Support this plan as it meets the needs until 2041 - would not like to see additional sites added to cover neighbouring districts.	Not stated	Not stated	Not stated	Support noted.
Hughes, K	RES24-114-04	Policy DS5	Support this plan. To have a development plan for Tier 1 settlements that have railway stations and good transport links. Support limited windfall development for Tier 4 settlements and smaller to protect the limited amount of services and infrastructure available.	Not stated	Not stated	Not stated	Support noted.

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
Brewood and Coven Parish Council	STA24-007-01	Policy DS5	<p>Brewood and Coven Parish Council would like to note its strong support for the proposed local plan put forward by South Staffordshire District Council.</p> <p>The two identified sites within the Parish are considered by the Council to be apposite for the current facilities and infrastructure available for the two villages of Brewood and Coven. The Parish Council notes that the opportunity for windfall sites is mentioned in addition to these. Furthermore, the Parish Council supports that the Policy DS5 has not allocated any housing developments for Tier 3,4 and 5 Settlements apart from windfall sites.</p>	Not stated	Not stated	Not stated	Support noted.
Sutton, M	RES24-226-02	Policy DS5	<p>Question the policy around very limited development in Tier 5 villages and areas based outside villages because of extra demand on non sustainable transport. The availability of public transport outside main service villages is almost non existent. This creates a barrier to sustaining small communities where people rely on their own transport and probably always have. Need to be careful that these communities don't die because of this policy, more emphasis needs to be placed on the view of the community towards limited development, to assist in keeping communities vibrant.</p>	Not stated	Not stated	Not stated	<p>It is considered appropriate to limit development in Tier 5 settlements due to their unsustainable location. It is considered that the policy strikes the correct balance by still allowing limited development including conversion of redundant rural buildings and limited affordable housing to meet local needs. The allowance for very limited redevelopment of PDL for housing where the proposal would not increase sustainable transport movements is considered appropriate. This could include redevelopment of an employment site that is no longer required where it can be demonstrated that unsustainable transport movements (e.g. private car) would be less under the proposed development than the current use.</p>
Windsor, R	RES24-255-03	Policy DS5	<p>Site 036c, in relation to Policy DS5 - Spatial Strategy.</p> <p>Plan considered unsound, as it is adjacent to the town of Stafford.</p> <p>Not considered to be sustainable growth, as it affects the sensitive landscape and raises potential highway concerns. Para 5.28 contradicts the aims of Policy DS5.</p> <p>Highlights the lack of effective joint working with Stafford Borough Council, and therefore fails to comply with duty to co-operate.</p>	Not stated	No	No	<p>Stafford Borough Council (SBC) and SSDC have an agreed SoCG that addresses Duty to Cooperate matters effectively that both parties consider to be sound and lawful as set out in the Duty to Cooperate Topic Paper 2024.</p> <p>Landscape sensitivity has been assessed through the Landscape Sensitivity Study. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that better perform as sustainable allocations. Any future planning application would be expected to address Policy NB4 – which the council has included as a proposed policy in the plan – insofar as the design and location of new development should take account of the characteristics and sensitivity of the landscape and its surroundings, including not having a detrimental impact upon any medium or long-distance views.</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							<p>Engagement throughout plan preparation has taken place with Local Highways Authority (Staffordshire County Council). They have not indicated that [access to the site is problematic or unmitigable] the impact of the proposed allocation would not generate any significant impacts on the transport network or highway safety that cannot be mitigated in line with paragraph 114 d of the NPPF.</p> <p>The council considers that all proposed allocations comply with the NPPF and the spatial strategy (identified in Policy DS5) insofar as they are located to deliver sustainable patterns of development that are distributed across the district on strategic planning matters and meet the authorities' identified housing need.</p> <p>No change proposed.</p>
Wyatt, B	RES24-261-04	Policy DS5	<ul style="list-style-type: none"> <li>- Site 036c has not been subject to effective DtC with SBC.</li> <li>- Inadequate emphasis being given to NPPF obligations to maintain natural and local environment, and protect and enhance landscapes.</li> <li>- The site address is misleading and is dissociated from Acton Trussell village.</li> <li>- Allocation of site 036c is contrary to national policy which is to prevent urban sprawl into the open countryside.</li> <li>- Brownfield land has not been prioritised.</li> <li>- No allowance is made to accommodate housing needs of SBC.</li> <li>- SBC are over-providing against their housing need and are providing for the needs of South Staffordshire.</li> <li>- The total housing figures exceed the housing target requirement.</li> <li>- Minimum capacities are used for residential allocations, these are often exceeded in practice.</li> <li>- Justification for allocating site 036c is that is not in the Green Belt.</li> <li>- Site 036c does not contribute to the GBBCHMA unmet needs as the site is the farthest distance from these authorities.</li> <li>- ONS population and census data is not reflected in the housing numbers.</li> <li>- Proposed allocation of site 036c does not comply with Policy DS5.</li> <li>- Site 036c is productive grade 3a farming/agricultural land.</li> <li>- Site 036c forms a wildlife route from Cannock Chase AONB to River Penk valley.</li> <li>- Development of site 036c will reduce the ability to resist development of wider site parcel (site 036a).</li> </ul>	No	No	No	<p>Stafford Borough Council (SBC) and SSDC have an agreed SoCG that addresses Duty to Cooperate matters effectively that both parties consider to be sound and lawful as set out in the Duty to Cooperate Topic Paper 2024.</p> <p>Landscape sensitivity has been assessed through the Landscape Sensitivity Study. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that better perform as sustainable allocations. Any future planning application would be expected to address Policy NB4.</p> <p>The council note the comment relating to the site address.</p> <p>The council considers that all proposed allocations comply with the NPPF and the spatial strategy – including Policy DS5 – insofar as they are located to deliver sustainable patterns of development that are distributed across the district on strategic planning matters and meet the authorities' identified housing need.</p> <p>As set out in the Housing Site Selection Topic Paper 2022, there is very limited available brownfield land located within the district, and</p>

**CHAPTER 5 & POLICIES DS1-DS5: DEVELOPMENT STRATEGY AND SUPPORTING TEXT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>- Allocation of site 036c has taken no account of Cannock Chase SAC.</p> <p>- DEFRA Magic Map shows the site is within the SSSI impact zones for Baswich Meadows SSSI and Millfield Quarry SSSI. No consideration of impacts on these is included in the site assessment.</p> <p>- DEFRA Magic Map shows site 036c is entirely within the Nitrate Vulnerability Zone and adjoining priority woodland.</p> <p>Site 036c should be deleted from the plan.</p>				<p>not enough to meet the district's housing requirement in full. Where brownfield site opportunities are available, these have been included within the Local Plan. However, the proposed allocation of greenfield (both Green Belt and Open Countryside) sites is necessary to contribute to the district's housing requirement.</p> <p>South Staffordshire District Council and Stafford Borough Council are in different HMAs and therefore there is no reason to provide housing. Furthermore, any oversupply that may have been delivered by Stafford is not a relevant consideration when preparing the plan for South Staffordshire.</p> <p>The housing allocations provide a 10% 'buffer', to ensure the plan can respond to changing circumstances. This is a key requirement of Local Plans and the principle of 'over allocation' to ensure the plan is flexible in this regard has been long established. So too has the practice of identifying and presenting site capacity as a 'minimum' number of dwellings, and site capacities are ultimately determined at the point of planning application where the finer site-specific details are accounted for.</p> <p>The council has sought to maximise the development opportunities on sites outside of the Green Belt in the first instance, this includes site 036c located within Open Countryside, before identifying Green Belt sites. This approach is in conformity with paragraphs 146 and 147 of the NPPF.</p> <p>The plan commits to providing a 640 contribution to unmet needs of the Great Birmingham and Black Country HMA, however, does not identify specific sites as making a cross-boundary contribution. The evidence demonstrates that the whole of the district is with the GBBCHMA and in reality, sites may be providing homes for both South Staffordshire residents and residents of neighbouring areas, and so it is not considered necessary to breakdown the contribution by site.</p> <p>The Council has used the standard method formula to determine our housing need and does</p>



**CHAPTER 5 & POLICIES DS1-DS5: DEVELOPMENT STRATEGY AND SUPPORTING TEXT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							<p>not consider that exceptional circumstances exist to deviate from its use, including population projections. The Council considers that the use of the standard method as the basis of our housing requirement is justified and an appropriate strategy.</p> <p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district's agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p> <p>The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact on habitats sites.</p> <p>The proposed allocation of the low-lying, northern portion of the wider site is designed to overcome issues with the southern portion and its impact upon the historic environment. The council considers that these site-specific issues will prevent any future development to the south of the proposed allocation.</p> <p>SAC constraints have been one of the assessment factors when determining the most sustainable allocations. Any specific developer contributions that are required to mitigate any adverse impacts of development on Cannock Chase SAC will be secured at the point of a planning application approval. The council considers that the mechanism to secure such a financial contribution is through Policy NB3 is satisfactory.</p> <p>The entirety of the district is included within the Nitrate Vulnerability Zone; therefore, it is</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							<p>unavoidable that all allocations will be located within and can't be considered a determinative factor in site selection.</p> <p>The methodology for the Sustainability Appraisal's (SA) assessment against SA Objective 3 - Biodiversity and Geodiversity has considered sites proximity to SSSIs (amongst other nationally and locally designated sites) in its scoring, including if a site falls within a SSSI Impact Risk Zone (IRZ). Where major positive and major negative effects are predicted in the 2024 SA then these have been recorded in the site assessment proformas in the Housing Site Assessment Topic Paper to be considered alongside other material planning considerations when arriving at a balanced judgement on which sites to propose for allocation.</p> <p>No change proposed.</p>

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**CHAPTER 6 & POLICIES MA1-SA5: SITE ALLOCATIONS**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
<b>GENERAL ISSUES: CHAPTER 6 (inc specific paras references)</b>							
Patel, D	RES24-171-01	6.1	Support this as there are properties that can be impacted in terms of heritage, greenbelt land which is integral to the area and a serious detrimental affect on the infrastructure.	Not stated	Not stated	Not stated	Comments noted.  No change proposed.
Massey, S & V	RES24-146-01	6.2	Local Plan is not sound as site 313 Swindon is still included - this site is not suitable for housing. There have been two failed planning applications. Reference 22/01151/PIP in 2022 Withdrawn by the applicant as it clearly did not meet Policy and was not going to be approved. Reference 23/00537/OUTM in 2023 - REFUSED the development fails both with regards to the NPPF and the adopted Core Strategy 2012, the developer themselves documented that the site was not deliverable.  There has been No appeal against the refusal of 23/00537/OUTM, the developer documented that the site is not deliverable.  Site 313 should be removed from the plan and returned to GB.	No	No	No	Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.  The land is a development boundary site allocated by the 2018 Site Allocations Document. A previous application was refused '23/00537/OUTM' due to the proposal extending beyond the site allocation and the access being in the Green Belt. There was also density and layout reasons for refusal. However, as noted in the officer report at 12.1.1 'The site has been earmarked for residential development as part of the Council's recently adopted Site Allocations Document after a lengthy and transparent consultation process. Whilst the principle of residential development on the site is supported, there are strong concerns with the amount of development proposed'.  The Council consider that a suitable scheme is achievable on the site.  No change proposed.
Webb, L	RES24-248-03	6.2	A review of green belt sites is welcomed as part of the plan. However, further consideration should be given to a wider range of green belt sites. However, the housing requirement for the South Staffordshire Plan should be higher and a greater contribution should be made to meeting the wider housing needs of the HMA, we are of the view that the spatial strategy needs to be reviewed and expanded to enable additional housing allocations. This is likely to include the need for further green belt release.	Not stated	Not stated	Not stated	Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.  The Council has included a buffer in housing supply above its proposed requirement which will provide around 10% plan flexibility (as set out in Policy DS4) to allow for any uncertainties around site delivery. It has worked proactively with site promoters and infrastructure providers on its two strategic allocations (Policies SA1-2) to

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							masterplan the sites and create greater certainty over site delivery. The vast majority of sites in the plan are unconstrained greenfield sites and the Council has a very strong track record of delivering major schemes, with only two full applications lapsing over a period of 27 years (1996-2023) as detailed further on our Housing Monitoring and Five-Year Land Supply 2022-2023 document. Given the mix of sites proposed in the plan, the Council therefore consider the 10% plan flexibility to be appropriate.
Hancher, R	RES24-095-05	6.7	The selection of the site appears to be based on it having good public transport links. As rail services are now being halved to Bilbrook and Codsall from June 2024 I do not believe that this has been taken into account. And the reduced public transport at this location will lead to an unmanageable increase in road traffic.	Yes	No	No	<p>National Rail and individual operators are responsible for train timetabling. Despite changes and fluctuations in train timetables, the Council consider that Rail travel from Tier 1 settlements offers the greatest opportunities for local residents to sustainably access jobs, given the short travel times to employment centres in the Black Country (particularly Wolverhampton), the comparatively high level of jobs which can be quickly accessed from these rail stations and the high level of South Staffordshire residents that work in the Black Country (particularly Wolverhampton).</p> <p>The council will continue to work with partners including Staffordshire County Council, neighbouring highways authorities, National Highways, Network Rail, Bus and rail providers and Active Travel England to promote sustainable transport schemes and new infrastructure across the district.</p> <p>No change proposed.</p>
Blackadder-Weinstein, D	RES24-017-08	6.7	The West Midlands trains service through Bilbrook is being reduced in the morning peak with no train serving Codsall or Bilbrook stations between 07:51 and 08:45. The trains immediately before that window will now be very busy already and the one at the end of that window will take 10 minutes longer to get to Birmingham than before because it will be routed via new stations at Wilenhall and Darleston. Queries whether knowledge of South Staffordshire now being effectively bypassed in the morning peak for rail commuters was had at the time of preparing a rail travel-focussed plan.	Not stated	Not stated	Not stated	<p>National Rail and individual operators are responsible for train timetabling. Despite changes and fluctuations in train timetables, the Council consider that Rail travel from Tier 1 settlements offers the greatest opportunities for local residents to sustainably access jobs, given the short travel times to employment centres in the Black Country (particularly Wolverhampton), the comparatively high level of jobs which can be quickly accessed from these rail stations and the high level of South Staffordshire residents that work in the Black Country (particularly</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							<p>Wolverhampton).</p> <p>The council will continue to work with partners including Staffordshire County Council, neighbouring highways authorities, National Highways, Network Rail, Bus and rail providers and Active Travel England to promote sustainable transport schemes and new infrastructure across the district.</p> <p>No change proposed.</p>
Adams, M	RES24-002-02	6.8	<p>SCC highways assessment does not match reality. The developer of the site has presented details of the proposed development with no connection to the existing Bilbrook Mill area, residents of which have stated that it is difficult to join traffic on leaving the site.</p> <p>Proposed exits from additional sites are badly sited, the joining roads being insufficient for the volume of traffic, and the loss of established vegetation is unacceptable in places.</p>	Not stated	Not stated	Not stated	<p>Engagement throughout plan preparation has taken place with Local Highways Authority (Staffordshire County Council). They have not indicated that the impact of the proposed allocation would not generate any significant impacts on the transport network or highway safety that cannot be mitigated in line with paragraph 114 d of the NPPF.</p>
Lloyd, K	RES24-136-03	6.9	<p>"Existing ecological features such as hedgerows will be maintained and wildlife habitat enhanced" - How will this be achieved when hedges will be ripped out to create the new roads into the site? How will wildlife be enhanced when the eastern limit of the suite runs right up to Barnhurst Lane, where will the wildlife corridor which currently runs alongside Barnhurst lane connects the River Penk to the Moat Brook be if it's built on?</p>	Not stated	Not stated	Not stated	<p>The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to – identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact on habitats sites.</p> <p>Biodiversity Net Gain (BNG) will ensure that the development has a measurably positive impact on biodiversity, compared to what was on site prior to the development. This gain will be at least 10%.</p>
Lloyd, K	RES24-136-04	6.9	<p>The NCN route 81 between Wolverhampton and Wobaston Rd is currently a muddy track which connects to purpose built track at either end. Cyclist are forced to use the poorly lit, pot hole ridden, dangerous Barnhurst Lane instead. Funding is currently being sought by the CRT and Sustrans to upgrade the canal towpath to make it more suitable to bicycles and pedestrians. S016 funding should be used to upgrade this path. This project has the support from community groups such as Friends of Bilbrook, the Parish Council, the CRT and Sustrans. An upgraded path is essential for the community.</p>	Not stated	Not stated	Not stated	<p>Staffordshire County Council are responsible for maintaining the highway network including NCN route 81. The council will work proactively with partners to promote sustainable transport measures and deliver high quality transport infrastructure and links across the district as stated in proposed policy EC12.</p> <p>Appropriate contributions will be sought to improve infrastructure in line with proposed policy EC11 and national policy.</p> <p>No change proposed.</p>
Lever, Turner & Cowdell Ltd for	AGT24-025-02-	6.11	<p>In respect of Policy SA2 i) delivery requirements, land at Wolgarston Farm (identified in our SHELAA submissions dated</p>	Not stated	Not stated	Not stated	<p>This is a new site which has been submitted to the Local Authority in early 2024 and has</p>



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Franklin-Jones & Bower C.J & P.J	01		<p>18th January 2024), is available to assist expansion of Wolgarston High School and/or Penkridge Leisure Centre. Any additional housing allocation/safeguard required for Penkridge is also available as identified in our SHELAA submissions.</p> <p>The recent availability of the Wolgarston Farm site provides a new strategic opportunity to enable the delivery of essential community infrastructure to help facilitate the planned strategic growth of the village in the most sustainable and accessible location related to the established Penkridge High School and Leisure Centre.</p>				<p>therefore not been assessed as part of the Regulation 19 Plan. The Plan contains sufficient allocations to meet the Plans housing target. The site will be added to the SHELAA and considered as part of future Local Plan reviews.</p> <p>No change proposed.</p>
Talbot, R	RES24-230-04	6.11	<p>Happy to see non green belt land allocated over other green belt sites.</p> <p>Penkridge has the appropriate infrastructure to support this development</p>	Not stated	Not stated	Not stated	<p>Comments noted.</p> <p>No change proposed.</p>
Historic England	STA24-023-01	6.19	<p>The site proforma's in Appendix C should make clear the distinction between mitigation and enhancement with regards to tree and hedgerows. Retention constitutes mitigation whilst additional planting constitutes enhancement.</p>	Not stated	Not stated	Not stated	<p>The Historic Environment Site Assessment Stage 2 (2022) does not make this distinction. The proformas provide direction to the 2022 Stage 2 HESA which provides the recommended mitigation and enhancement details.</p> <p>No change proposed.</p>
Historic England	STA24-023-01	6.19	<p>Amend the site proformas on Appendix C to provide links to the site specific recommendations contained within the HESA documents.</p>	Not stated	Not stated	Not stated	<p>The proformas reference the Historic Environment Site Assessment Stage 2 (2022) which is available on the Council website. It is considered that hyperlinks are not required and would risk 'breaking' if the documents file paths are moved on the website.</p> <p>No change proposed.</p>
Lever, Turner & Cowdell Ltd for Phillips, S & Parsons, S	AGT24-025-01-01	6.19	<p>Land North of Cocksparrow Lane (Site 732, identified as 'potentially suitable' in the 2022 SHELAA), should be considered as a Safeguarding Allocation (alongside the proposed allocation of Policy SA3, Site 016 'Pear Tree Farm') for its sustainable location related to established village facilities/amenities; its relatively low spatial and visual Green Belt/landscape impact; its immediate proximity to existing Public Open Space and access to established Public Rights of Way; and the multiple community based benefits (as identified in our previous submissions) offered, including the potential delivery of improved facilities and parking provision related to the adjoining existing sports ground.</p>	Not stated	Not stated	Not stated	<p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The Council has included a buffer in housing supply above its proposed requirement which will</p>

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							<p>provide around 10% plan flexibility (as set out in Policy DS4) to allow for any uncertainties around site delivery. It has worked proactively with site promoters and infrastructure providers on its two strategic allocations (Policies SA1-2) to masterplan the sites and create greater certainty over site delivery. The vast majority of sites in the plan are unconstrained greenfield sites and the Council has a very strong track record of delivering major schemes, with only two full applications lapsing over a period of 27 years (1996-2023) as detailed further on our Housing Monitoring and Five-Year Land Supply 2022-2023 document. Given the mix of sites proposed in the plan, the Council therefore consider the 10% plan flexibility to be appropriate.</p>
Griffiths, S	RES24-088-01	6.19	<p>Strong objection to 036C, land adjacent to Wildwood. This land is prime farming land, producing various crops and feeding cattle. There are no facilities for this housing proposal, schools, GPs etc are all full, the hospital is struggling too. This land was refused planning permission recently. There are strong objections from Stafford councillors and residents. A corridor between villages and settlements was approved by South Staffs and councillors strongly agreed that corridors between boroughs must be upheld. The surrounding roads and lanes cannot take any more traffic. This land is isolated from S.S and is too close to Cannock Chase. Remove site 036c.</p>	Yes	No	No	<p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district's agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p> <p>Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies. Engagement throughout plan preparation has taken place with Local Highways Authority, School Organisation Team (SOT) (both Staffordshire County Council), and Staffordshire and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical Commissioning Group). None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities, or addressed through proposed Policies HC14, and HC15.</p> <p>The refusal of planning permission historically does not preclude a site from being proposed for allocation. Like all sites proposed for residential allocation, site 036c has been assessed in the round against a consistent set of planning criteria</p>

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							<p>in order to determine those that better perform as sustainable allocations. The council does not consider that the proposed allocation of site 036c will have a negative impact upon the separation of Stafford town and the villages/settlements within South Staffordshire District. As a small urban extension, the site option performs better than other site options as set out in the Housing Site Selection Topic Paper 2024.</p> <p>Any future planning application would be expected to address Policy NB4 insofar as they must conserve and enhance the landscape and scenic beauty of the area and conform with the most up to date SPDs.</p> <p>No change proposed.</p>
Lower Penn Parish Council	STA24-028-01	6.41	<p>LATE SUBMISSION</p> <p>LPPC agree that this need will be met on or as extensions to existing sites.</p> <p>We do not agree that greenbelt should be used for any new traveller sites as it would impact upon the openness of the greenbelt and we do not feel there are exceptional circumstances to justify the release of green belt. We feel that SSDC has researched all potential options on both public and private land that could be made available and no site identified is viable.</p>	Not stated	Yes	Not stated	<p>Comments noted. The Council has considered Green Belt options for the provision of additional sites / pitches (see Gypsy and Traveller Topic Paper 2024).</p> <p>No change proposed.</p>
Cashmore, P & R	RES24-036-04	6.43	<p>Table includes M6 J13 Dunston at 17.6ha states that the supply of employment land is sufficient. J13 land is subject to several planning restrictions from Network Rail, National Highways, Severn Trent Water Ltd and SSC Flood Risk Management Team. NPPF (173) states when developing land flood risk should not be increased elsewhere. NPPF (173) states when developing land flood risk should not be increased elsewhere. This area is Flood zone 1 and adjacent to Flood zone 3.</p> <p>It would be restricted with its employment usage and therefore should not be allocated as surplus available land.</p>	No	No	No	<p>The proposed allocation at M6, Junction 13 has been proposed for allocation based on a balanced judgement having regard to a number of considerations and covered in our Economic Strategy and Site Assessment Topic Paper 2024. These include site specific credentials and that it is the only significant site that has been put forward at a key motorway junction in the district on land outside of the Green Belt; shortfalls of employment land in the wider FEMA; and regional evidence of strong demand. Allocating M6 Junction to compliment other sites in the pipeline ensures a strategy that positively and proactively encourages sustainable economic growth.</p> <p>No change proposed.</p>
Savills UK Ltd for St Modwen & JM Holt	AGT24-038-04-04	6.43-6.44	<p>We do not consider that the identified objectively assessed need for employment land for South Staffordshire is sufficient to meet South Staffordshire's needs as well as provide surplus available</p>	Yes	No	No	<p>As confirmed through the EDNA update, the pipeline supply of employment land over the plan period is sufficient to meet South</p>

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			to contribute towards cross boundary unmet needs' The objectively assessed need for employment land for South Staffordshire over the period 2023-2041 should be reviewed and uplifted, taking into considerations the analysis contained within the Savills Industrial and Logistics (I&L) Needs Assessment – Addendum Note (May 2024) (Appendix 2) and the Savills Industrial and Logistics Needs Assessment (February 2024) (Appendix 1).				Staffordshire’s needs as well as provide surplus available to contribute towards cross boundary unmet needs.  No change proposed.
Powell, D	RES24-185-02	6.44	Table includes M6, Junction 13, Dunston at 17.6ha and states that the pipeline supply of employment land over the plan period is sufficient. J13 land is subject to several planning restrictions regarding flooding and major infrastructure advancements and would be restricted with its employment usage and therefore should not be allocated as "Surplus" available land giving a false target.	No	No	No	The proposed allocation at M6, Junction 13 has been proposed for allocation based on a balanced judgement having regard to a number of considerations and covered in our Economic Strategy and Site Assessment Topic Paper 2024. These include site specific credentials and that it is the only significant site that has been put forward at a key motorway junction in the district on land outside of the Green Belt; shortfalls of employment land in the wider FEMA; and regional evidence of strong demand. Allocating M6 Junction to compliment other sites in the pipeline ensures a strategy that positively and proactively encourages sustainable economic growth.  No change proposed.
Savills UK Ltd for St Modwen & JM Holt	AGT24-037-04-04	Table 9	We do not agree with Table 9 as currently written in the Plan. We also consider that the site at i54, Wobaston Road (2.4 hectares) (E24) is overestimated in terms of the land that it can deliver for employment. It is also noted that I54 western extension (north) (E44) is 'restricted to E(g)/B2 use which means it can only respond to a limited component of market demand.	Yes	No	No	2.4ha of suitable and deliverable land is available at i54 at the bas date of April 2023, which is reflected in the site allocation.  No change proposed.
Savills UK Ltd for St Modwen & JM Holt	AGT24-038-04-05	6.46	For Junction 13, M6, it should be recognised that the site is strategically located on the M6 corridor, and is capable of delivering both mid and big box units. Whilst we agree that the Junction 13 site allocation is necessary and is capable of contributing towards the wider needs of the FEMA, we do not agree that it only required to meet unmet needs.	Yes	No	No	Comments noted.
Cashmore, P & R	RES24-036-05	6.46	Although the area is non green belt, it is BMV agricultural land and is not needed to increase the district's supply of employment. In the Farm to Fork Summit 2024 at Downing Street the Prime Minister unveiled measures to support farmers and grow the UK’s farming & food sector.  The NPPF (180) (b) states we need to recognise the intrinsic character & beauty of the countryside & the wider benefits. (d) minimise impacts on biodiversity – our site homes newts,	No	No	No	The proposed allocation at M6, Junction 13 has been proposed for allocation based on a balanced judgement having regard to a number of considerations and covered in our Economic Strategy and Site Assessment Topic Paper 2024. These include site specific credentials and that it is the only significant site that has been put forward at a key motorway junction in the district on land outside of the Green Belt; shortfalls of

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			birds, bats, hedgehogs, insects & other animals.  Nearby Cannock Chase is an AONB, said site would be visible.				employment land in the wider FEMA; and regional evidence of strong demand. Allocating M6 Junction to compliment other sites in the pipeline ensures a strategy that positively and proactively encourages sustainable economic growth.  No change proposed.
Powell, D	RES24-185-03	6.46	M6 Junction 13 Although the area is non green belt, it is Grade 1 agricultural land and is not needed to increase the district's supply of employment. The site consists of a mix of Grade 2 and Grade 3 agricultural land; it is classified as BMV land. There is no mention of the nearby school and residential properties that would be directly blighted by any potential development as well as the issues of flooding and damage to wildlife habitation, along with the re-routing of public footpaths and bridleways.	No	No	No	The proposed allocation at M6, Junction 13 has been proposed for allocation based on a balanced judgement having regard to a number of considerations and covered in our Economic Strategy and Site Assessment Topic Paper 2024. These include site specific credentials and that it is the only significant site that has been put forward at a key motorway junction in the district on land outside of the Green Belt; shortfalls of employment land in the wider FEMA; and regional evidence of strong demand. Allocating M6 Junction to compliment other sites in the pipeline ensures a strategy that positively and proactively encourages sustainable economic growth.  No change proposed.
Hodgkinson, K	RES24-111-01	6.46	Allocating employment site at M6 Junction 13 is not a viable plan. St Modwen have already applied to develop that piece of land & there have been major concerns voiced by Network Rail, National Highways, Severn Trent Water Ltd, and Staffordshire County Council Flood Risk Management Team (the land is on Flood Zone 1 but adjacent to land which is Flood Zone 3 & frequently floods).  It contravenes NPPF paragraph 173, 180 b, and 180 d.  Purposeless including site E30 as proposed employment allocation as it has already been assessed through DM process and planning permission will never be granted.  Although non-Green belt land, site E30 is high quality agricultural land. Allocating this is against the Government's policies mentioned in the Farm to Fork Summit 2024.  The site is adjacent St Leonard's First School. There will be significant noise & air pollution affecting the school and other local residents.  The current biodiversity is immense & is home to newts, birds,	No	No	No	The proposed allocation at M6, Junction 13 has been proposed for allocation based on a balanced judgement having regard to a number of considerations and covered in our Economic Strategy and Site Assessment Topic Paper 2024. These include site specific credentials and that it is the only significant site that has been put forward at a key motorway junction in the district on land outside of the Green Belt; shortfalls of employment land in the wider FEMA; and regional evidence of strong demand. Allocating M6 Junction to compliment other sites in the pipeline ensures a strategy that positively and proactively encourages sustainable economic growth.  No change proposed.



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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			bats, hedgehogs. insects & other animals  Site E30 should be removed from the Local Plan as potential employment land.				
Pliva, G	RES24-183-01	6.46	Object to the proposed use of land at Dunston which should be removed from the plan.	Yes	No	No	The proposed allocation at M6, Junction 13 has been proposed for allocation based on a balanced judgement having regard to a number of considerations and covered in our Economic Strategy and Site Assessment Topic Paper 2024. These include site specific credentials and that it is the only significant site that has been put forward at a key motorway junction in the district on land outside of the Green Belt; shortfalls of employment land in the wider FEMA; and regional evidence of strong demand. Allocating M6 Junction to compliment other sites in the pipeline ensures a strategy that positively and proactively encourages sustainable economic growth.  No change proposed.
Harvey-Stephens, R	RES24-100-01	6.46	'Policy DS3 provisions indicate the types of development which will, in principle, be supported within the Open Countryside' E(g); B2; B8 warehousing is not included in this policy. This change of land use, from best and most versatile agricultural land / grade 2 Agricultural land to employment land contravenes this policy and should not be accepted.	No	No	No	The proposed allocation at M6, Junction 13 has been proposed for allocation based on a balanced judgement having regard to a number of considerations and covered in our Economic Strategy and Site Assessment Topic Paper 2024. These include site specific credentials and that it is the only significant site that has been put forward at a key motorway junction in the district on land outside of the Green Belt; shortfalls of employment land in the wider FEMA; and regional evidence of strong demand. Allocating M6 Junction to compliment other sites in the pipeline ensures a strategy that positively and proactively encourages sustainable economic growth.  No change proposed.
Sutton, M	RES24-226-03	6.46	The M6 Jun 13 Dunston employment land was not an original preferred option and has only been added to the 'local plan' at the last stage. Residents have not had an opportunity to influence and shape future development within their community as per the statement of community involvement (2019) that commits the council to taking a proactive approach to community involvement. The localism Act 2010 places a strong emphasis on empowering communities to shape where they live and the NPPF states that	Not stated	Not stated	Not stated	The proposed allocation at M6, Junction 13 has been proposed for allocation based on a balanced judgement having regard to a number of considerations and covered in our Economic Strategy and Site Assessment Topic Paper 2024. These include site specific credentials and that it is the only significant site that has been put forward at a key motorway junction in the district on land outside of the Green Belt; shortfalls of

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			'Plans should be shaped by early, proportionate and effective engagement....' Residents have not had these opportunities.				employment land in the wider FEMA; and regional evidence of strong demand. Allocating M6 Junction to compliment other sites in the pipeline ensures a strategy that positively and proactively encourages sustainable economic growth.  The proposal is being consulted on as part of this Regulation 19 consultation.  No change proposed.
Sutton, M	RES24-226-04	6.47	There is no assessment to support the proposal that Dunston junc13 is an appropriate location for an employment site to justify it being added to the local plan, the suitability of a location should be fundamental and of paramount importance. The only justification is 'It's near the M6' There is no assessment of the adverse impact on a small village, a school, a community, listed buildings, health of children, removal of Grade 2 agricultural land, Cannock chase (national landscape), conserving & enhancing the natural environment, promoting safe & health communities and protection of the open countryside.	Not stated	Not stated	Not stated	The proposed allocation at M6, Junction 13 has been proposed for allocation based on a balanced judgement having regard to a number of considerations and covered in our Economic Strategy and Site Assessment Topic Paper 2024. These include site specific credentials and that it is the only significant site that has been put forward at a key motorway junction in the district on land outside of the Green Belt; shortfalls of employment land in the wider FEMA; and regional evidence of strong demand. Allocating M6 Junction to compliment other sites in the pipeline ensures a strategy that positively and proactively encourages sustainable economic growth.  No change proposed.
Cashmore, P & R	RES24-036-06	6.47	Identified as a "Non-Strategic Site" for smaller scale employment when the quota has already been met. With the restrictions and major infrastructure work required to develop the land, we see this as a non-viable option and should be excluded from the local plan as no detriment to the required target for employment land.	No	No	No	The proposed allocation at M6, Junction 13 has been proposed for allocation based on a balanced judgement having regard to a number of considerations and covered in our Economic Strategy and Site Assessment Topic Paper 2024. These include site specific credentials and that it is the only significant site that has been put forward at a key motorway junction in the district on land outside of the Green Belt; shortfalls of employment land in the wider FEMA; and regional evidence of strong demand. Allocating M6 Junction to compliment other sites in the pipeline ensures a strategy that positively and proactively encourages sustainable economic growth.  No change proposed.
Cashmore, P & R	RES24-036-07	6.47	Although the area is non green belt, it is BMV agricultural land and is not needed to increase the district's supply of	No	No	No	The proposed allocation at M6, Junction 13 has been proposed for allocation based on a balanced

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>employment. In the Farm to Fork Summit 2024 at Downing Street the Prime Minister unveiled measures to support farmers and grow the UK's farming &amp; food sector.</p> <p>The NPPF (180) (b) states we need to recognise the intrinsic character &amp; beauty of the countryside &amp; the wider benefits. (d) minimise impacts on biodiversity – our site homes newts, birds, bats, hedgehogs, insects &amp; other animals.</p> <p>Nearby Cannock Chase is an AONB, said site would be visible.</p>				<p>judgement having regard to a number of considerations and covered in our Economic Strategy and Site Assessment Topic Paper 2024. These include site specific credentials and that it is the only significant site that has been put forward at a key motorway junction in the district on land outside of the Green Belt; shortfalls of employment land in the wider FEMA; and regional evidence of strong demand. Allocating M6 Junction to compliment other sites in the pipeline ensures a strategy that positively and proactively encourages sustainable economic growth.</p> <p>No change proposed.</p>
Powell, D	RES24-185-04	6.47	<p>Identified as a "Non-Strategic Site" for smaller scale employment when the quota has already been met. With the restrictions and major infrastructure work required to develop the land, this is a non-viable option and should be excluded from the local plan as no detriment to the required target for employment land.</p>	No	No	No	<p>The proposed allocation at M6, Junction 13 has been proposed for allocation based on a balanced judgement having regard to a number of considerations and covered in our Economic Strategy and Site Assessment Topic Paper 2024. These include site specific credentials and that it is the only significant site that has been put forward at a key motorway junction in the district on land outside of the Green Belt; shortfalls of employment land in the wider FEMA; and regional evidence of strong demand. Allocating M6 Junction to compliment other sites in the pipeline ensures a strategy that positively and proactively encourages sustainable economic growth.</p> <p>No change proposed.</p>
Powell, D	RES24-185-05	6.48	<p>B2 and B8 uses are not in keeping with other developments in the area: Southan Antique village, Dunston Business Village. These are low level office and small retail buildings.</p> <p>Site E30 (M6 Junction 13, Dunston) should be removed from the plan.</p>	No	No	No	<p>The proposed allocation at M6, Junction 13 has been proposed for allocation based on a balanced judgement having regard to a number of considerations and covered in our Economic Strategy and Site Assessment Topic Paper 2024. These include site specific credentials and that it is the only significant site that has been put forward at a key motorway junction in the district on land outside of the Green Belt; shortfalls of employment land in the wider FEMA; and regional evidence of strong demand. Allocating M6 Junction to compliment other sites in the pipeline ensures a strategy that positively and proactively encourages sustainable economic growth.</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							The proposed use classes for E30 are considered suitable in line with its allocation.  No change proposed.
Cashmore, P & R	RES24-036-08	6.48	B2 and B8 uses are not in keeping with other local developments (such as Southan Antique village and Dunston Business Village) of our local area. These are low level office and small retail buildings.	No	No	No	The proposed allocation at M6, Junction 13 has been proposed for allocation based on a balanced judgement having regard to a number of considerations and covered in our Economic Strategy and Site Assessment Topic Paper 2024. These include site specific credentials and that it is the only significant site that has been put forward at a key motorway junction in the district on land outside of the Green Belt; shortfalls of employment land in the wider FEMA; and regional evidence of strong demand. Allocating M6 Junction to compliment other sites in the pipeline ensures a strategy that positively and proactively encourages sustainable economic growth.  The proposed use classes for E30 are considered suitable in line with its allocation.  No change proposed.
<b>POLICY MA1: MASTER PLANNING STRATEGIC SITES</b>							
Historic England	STA24-023-01	Policy MA1	Include within the policy reference to the need to conserve the significance of heritage assets, including their setting, as a specific bullet point.	Not stated	Not stated	Not stated	Agree with proposed suggestion. Minor modification 004 – within development phasing planning and infrastructure delivery (bullet point H)
Lichfields for St Philips	AGT24-026-02-03	Policy MA1	St Philips welcome the intention of MA1 to ensure comprehensive development, and have no objections in principle to the preparation, general scope or intention of SMPs. It requires further clarification and amendments to ensure it is sound. Policy states that the SMP will be approved by the Council’s Corporate Director of Place & Communities. Para 6.6 also states they would be approved through the relevant Cabinet Member and Chairman of Planning Committee. Para 6.6 should be amended to ensure the approval process is unambiguous. The policy should be clear in stating that the provision of public open space/ GI should be driven by the relevant standards and any evidence of need / demand at the time. Clause H should be reviewed in relation to the timing and approval – it should reflect that a SMP would be submitted alongside a planning application and approved at determination. Clause I should remove reference to ‘provably popular’ as it is	Not stated	No	Not stated	Support of the policy noted.  Para 6.6 states that it will be signed off by the Corporate Director of Place & Communities <b>through consultation</b> with the Cabinet Member and Chair of Planning Committee. Sign-off in the guidance text and policy is the Corporate Director. The policy states that details of open space provision will be in accordance with up-to-date evidence.  The explanatory paragraphs prior to the clauses within the policy reflect the expected timescales and approvals of the SMP.  Minor modification 005 – removal of ‘provably

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			<p>unspecific terminology and focus on ensuring high-quality design.</p> <p>Amendments to Para 2 and 4, Clause E, H and I detailed in the full representation.</p>				<p>popular' as it is not defined in the National Model Design Code</p> <p>No other changes proposed.</p>
Cerda for Trine Developments	AGT24-011-01-01	Policy MA1	<p>The concept of the preparation of strategic master plans and indicative concept plans to support the play for key strategic sites is fundamentally endorsed. These plans are envisioned to serve as the foundation for more comprehensive master plans and design codes.</p> <p>However, delays in adopting a plan means there has been considerable delay and most of the allocation adjoining our site is now subject of an outline planning application which effectively master plans much of the SA2 allocation. It seems likely a decision will be made on the planning applications prior to master-planning being concluded.</p> <p>The wording of MA1 encourages larger landowners of strategic allocations to submit planning applications without the collaboration this policy seeks as it enables landowners to bypass an engagement process with other landowners.</p>	Yes	No	Yes	<p>Comments noted throughout and no change proposed.</p> <p>The policy seeks to ensure that, where sites have multiple landowners, collaboration is undertaken prior to submission of the SMP to the local authority as it requests a 'comprehensive and deliverable site-wide Strategic Master Plan'.</p>
Evolve Planning & Design for Bloor Homes	AGT24-017-01-11	Policy MA1	<p>Land East of Bilbrook and Additional Land East of Bilbrook - Bloor Homes supports the Council's masterplanning approach to ensure high quality design and confirms that a comprehensive and deliverable site-wide Strategic Master Plan will be prepared in respect of the Strategic Development Location at Bilbrook. Bloor Homes welcomes the amendment to MA1 that provides further clarity in respect of the process for submitting and approving SMPs.</p>	Yes	No	Yes	<p>Comments noted and confirmation that a Strategic Masterplan will be submitted for Bilbrook is welcomed.</p>
Evolve Planning & Design for Bloor Homes	AGT24-017-01-11	Policy MA1	<p>Land East of Bilbrook and Additional Land East of Bilbrook - The scope of the policy is appropriate, but it should be amended to ensure that it is effective in NPPF terms. The policy should allow for the approval of SMPs through the application process where an application has been submitted for any part of a strategic allocation. The policy should also clarify that SMPs should broadly align with the scope of concept plans, but that technical assessments should fundamentally drive the most appropriate proposal.</p>	Yes	No	Yes	<p>The policy does allow for submission and approval of the SMP through the planning application stage where it precedes the adoption of the Local Plan, however it would be preferable for these to be submitted as part of pre-application discussions to ensure there is no delay to the planning application.</p> <p>The policy states that the SMP will be in line with the objectives and concept plan as set out in the relevant policy. The objectives in the relevant policy will account for the technical assessments that should form part of the proposed development and SMP.</p> <p>No change proposed.</p>
Rapleys LLP for Vistry Group	AGT24-035-01-04	Policy MA1	<p>Policy MA1 requires the submission and approval of site wide masterplans for the strategic sites to precede the submission of planning applications, or as part of that planning application</p>	Not stated	No	No	<p>Approval of the Strategic Masterplans prior to the submission of a planning application is unlikely to delay the delivery of the sites as significant pre-</p>



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			process. They will be a material consideration in the determination of the planning applications for the strategic sites. Approval prior to the submission of planning applications in particular, has the potential to delay delivery of these strategic housing allocations within the plan period, thereby running the risk of the Council not delivering the 1,877 dwellings identified as coming forward from them. Vistry considers that the 10% buffer of overprovision is therefore not sufficient to overcome the consequence of this potential non-delivery or shortfall in delivery from the two strategic sites within the plan period.				application discussions will occur for each site, and therefore the approval of the SMP through the pre-application process is realistic.  The Council has included a buffer in housing supply above its proposed requirement which will provide around 10% plan flexibility (as set out in Policy DS4) to allow for any uncertainties around site delivery. It has worked proactively with site promoters and infrastructure providers on its two strategic allocations (Policies SA1-2) to masterplan the sites and create greater certainty over site delivery. The vast majority of sites in the plan are unconstrained greenfield sites and the Council has a very strong track record of delivering major schemes, with only two full applications lapsing over a period of 27 years (1996-2023) as detailed further on our Housing Monitoring and Five-Year Land Supply 2022-2023 document. Given the mix of sites proposed in the plan, the Council therefore consider the 10% plan flexibility to be appropriate.
Lloyd, K	RES24-136-01	Policy MA1	How will engagement with the local community be done? I am part of the Bilbrook neighbourhood plan and want to know how community engagement is going to happen. Will the Friends of Bilbrook also be consulted? Who is going to do this the Council - who may take our comments on board, or the developer who probably won't?  Bilbrook's community facilities are overwhelmed already, we have 2 halls for community events and these are already fully booked. Will we see funding to increase this provision, an extension to the village hall would be the bare minimum required.	Not stated	Not stated	Not stated	The council will continue to work proactively with neighbourhood plan groups and other community groups and will encourage developers to do the same through development of their masterplan.  No change proposed.
Patten, M	RES24-172-01	Policy MA1	I welcome consideration being given to ease of access to transport links and would appreciate clear consideration of the impact of developments upon existing roads / users. To that end, adding to existing traffic through Brewood would be a problem. Traffic routing to avoid the village centre would be appreciated.	Not stated	Not stated	Not stated	Comments noted. As MA1 relates primarily to the two strategic housing allocations, located in Penkridge and Bilbrook, no changes regarding traffic routing in Brewood are proposed.
CPRE Staffordshire	STA24-013-06	Policy MA1	In considering more detailed proposals for strategic sites South Staffordshire council should agree to account for the expressed needs of overspill authorities.	Not stated	Not stated	No	A contribution to unmet needs of authorities in the Housing Market Area is being provided in addition to meeting our own housing needs, in accordance with what the council considers to be an appropriate strategy. Ongoing cooperation

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							with Duty to Cooperate bodies has taken place and informed the plans strategic approach, as detailed in our Duty to Cooperate Topic Paper. Emerging Statements of Common Ground are being prepared with all neighbouring and HMA authorities to reflect our respective positions.
Grainger, P	RES24-087-04	Policy MA1	Site 036c "Where applications have been submitted to the council prior to the adoption of this Plan, a Strategic Master Plan should be agreed with the council prior to or as part of the grant of planning permission". I suggest this may have already taken place – otherwise why would the council change its view from previous applications that were dismissed by unanimous vote against.	Not stated	No	Not stated	MA1 relates primarily to the two strategic housing allocations, located in Penkridge and Bilbrook. A Strategic Master Plan will not be required for Site 036c as it does not fall within the category of sites identified within the policy - "this policy shall also apply to large scale or complex applications on sites not allocated in the plan".
Davison, J	RES24-053-01	Policy MA1	The Masterplanning needs to go beyond the boundaries when it comes to the most overlooked form of transport, walking. Walking is not specialist activity with special footwear it is movement but does require drained surface path. This is particularly the case when it comes to rural roads in South Staffordshire. For instance although the main road between Wolverhampton and Bridgnorth connects a string of villages (some being expanded), the SS section has no tarmac footway. To MA1 (d) add 'Extension of footway provision along associated rural roads'	Not stated	Not stated	Not stated	The council has included a sustainable transport policy (Policy EC12) that is considered to sufficient to address sustainable transport matters on a scheme-by-scheme basis. It will ensure that all development (including proposed allocations) maximises opportunities for walking, cycling, and public transport usage, and deliver expanded provision to meet increased cumulative demand for bus and rail services and connections.  However, MA1 relates primarily to the two strategic housing allocations, located in Penkridge and Bilbrook. Whilst footpaths and walking routes will be accommodated within the strategic allocations, it is not the role of the developer of these sites to fix current deficiencies in footpaths in South Staffordshire, especially when these are outside the boundary of their land ownership.
Webb, L	RES24-248-04	Policy MA1	Support the need to masterplan sites for allocation within the plan and would welcome the opportunity to work collaboratively with the Council.  As part of the consultation, it is recommended that the land at Wood Hayes Road, Wolverhampton is reviewed and assessed.	Not stated	Not stated	Not stated	Comments noted.  Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.
Define Planning and Design Ltd for Bloor Homes	AGT24-014-01-02	Policy MA1	Policy MA1's scope is appropriate, but it should be amended to ensure that it is effective in NPPF terms. The policy should allow for the approval of SMPs through the application process where an application has been submitted for any part of a strategic allocation. The policy should also clarify that SMPs should broadly align with the scope of Concept Plans, but that technical	Yes	No	No	It is considered that the wording within Policy MA1 already addresses the issues raised. Policy MA1 sets out that any SMP will be informed by the Concept Plan and should show within them several criteria set out in points a – j of the policy, most of which would be informed by

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			assessments should fundamentally drive them. Clause I should remove reference to 'provably popular' Design Codes.				technical assessments.  Minor modification 004 – removal of 'provably popular' as it is not defined in the National Model Design Code
<b>POLICY SA1: STRATEGIC MASTER PLANNING LOCATION: LAND EAST OF BILBROOK</b>							
Canal and River Trust	STA24-009-01	Policy SA1	Welcome the retention of text within Policy SA1 recognising that active travel improvements will be necessary. The Shropshire Union Canal towpath adjacent to this site is part of the Sustrans National Cycling Network, route 81. Parts of this towpath have been upgraded, allowing better quality active travel routes into Wolverhampton. Some sections have yet to be upgraded, including the section opposite this site.	Not stated	Not stated	Not stated	Comments noted.  No changes proposed.
Staffordshire County Council LLFA	STA24-044-19	Policy SA1	Flood Zone 2 and 3 in the extreme Southern limit Surface water - very intermittent minor ponding on site and minor flow path in south of site Flooding hotspots - large cluster of internal property flooding hotspots to the south of the railway. Instances of highways flooding dotted through the village.	Not stated	Not stated	Not stated	SFRA may be required for this site.  Flood Risk Assessment will be required as part of any planning application and appropriate mitigation measures will be incorporated.
Sport England	STA24-042-01	Policy SA1	More detail required on how the playing pitch and ancillary facilities requirements to meet the needs generated by the site will be met. The policy should be more flexible to ensure that if provision cannot be delivered on the named site that any off-site provision could be secured in alternative locations would benefit occupiers of the allocated site.	Yes	No	Yes	Details are currently being discussed as part of the ongoing planning application. Sport England are being engaged as part of this process.
Environment Agency	STA24-019-01	Policy SA1	We welcome the addition of a Level 2 SFRA. The Level 2 SFRA shows that the critical 1 in 100 year plus climate change flood extent encroaches (albeit largely into public open space) on sites 119a, 284, 139, Land North of Penkridge, SA1 and SA4. The SFRA confirms that for the majority of these sites the encroachment is only minor.  All these sites will therefore require a site specific FRA which shows development laid out as to avoid the floodplain and finished floor levels 600mm above the 1 in 100 plus climate change flood level. This should be detailed within the allocation requirements. In addition, the quantum of development should be reviewed to ensure that it can fit onto the area outside the 1 in 100 plus climate change flood event, with particular note of 119a which shows about a third of the site affected by flooding.  Although referenced within the Sustainability Appraisal it is unclear where the evidence sits to clearly demonstrate how the proposed site allocations have had the Sequential Test applied as is required by Paragraphs 161 and 162 of the NPPF. We recommend however given the proximity of the fluvial floodplain,	Not stated	Not stated	Not stated	Comments noted.  Following the representation submitted by the Environment Agency during the 2022 Regulation 19 consultation, wording was added to sites 119a, 139, SA1, SA2 and 617 which should alleviate concerns raised - "Provide a site-specific FRA which shows development laid out as to avoid the floodplain and finished floor levels 600mm above the 1 in 100 plus climate change flood level."

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			<p>residual risk should be mitigated for by it being required that finished floor levels are set at or in excess of 600mm above the 1in 100 year plus climate change for that specific location.</p> <ul style="list-style-type: none"> <li>• Site Ref 617</li> <li>• Site Ref 646a.</li> <li>• Site Ref 646b</li> </ul>				
Environment Agency	STA24-019-01	Policy SA1	<p>Sun Valley Foods Billbrook, located on the Balliol Business Park is regulated by the Environment Agency. The site is currently surrounded by agricultural land and industrial development but the proposals under site Ref 519 would bring the large housing development approximately 75m from the facility. Food production operates 24/7 which includes the use of ovens and fryers to cook the food and chiller units to freeze the product before it leaves site in refrigerated trailers. The facility also has effluent treatment, external storage of waste product and of course incoming and outgoing vehicle movements with audible alarms, therefore there is a possibility that amenity issues could be experienced. Bilbrook HWRC, a small well run site currently owned by Amey Highways is also nearby. There does remain potential for this to be a problem if residential receptors are brought closer to the site than at present.</p> <p>We recommend your planning policies ensure that appropriate assessment and mitigation can be carried out by the agent of change (ie residential allocations). Where any mitigation is not practical, properties should not perhaps be built close to the site perimeter. We recommend strategic policy SA1 references the risks associated with their proximity to such facilities, and the need for assessment and/or mitigation measures in order to inform and steer the masterplanning process.</p>	Not stated	Not stated	Not stated	<p>Existing uses in close proximity to proposed residential allocations will be fully accounted for. Planning applications on these sites will be assessed in consultation with the relevant expert departments / organisations and any mitigation measures will be detailed in consultation responses which are then fed back to the applicant and / or agent and any potential amendments sought. This will be on a site-by-site and case-by-case basis, rather than a blanket approach within the policy.</p> <p>Notwithstanding the above, additional wording was added to the policy following the 2022 Regulation 19 consultation which states – “consider potential amenity issues and any mitigation requirements as a result of proximity to existing commercial units to the east of the site”.</p> <p>No change proposed.</p>
Acres Land and Planning for Hallam Land Management	AGT24-001-01-01	Policy SA1	<p>Allocation of site is contrary to green belt policy which specifically guards against coalescence of settlements with main towns and cities – in this case the effective merging of Bilbrook with the edge of Wolverhampton.</p> <p>It also conflict with the recommendations of the GL Hearn/Wood Strategic Growth Study 2018 which specifically recommended releasing land for between 500-2,500 dwellings to the north of Codsall/Bilbrook, as opposed to east of Codsall/Bilbrook as this site is.</p> <p>it also conflicts with the findings of the Council’s own 2019 LUC Green belt study which found that the land to the east of Bilbrook has a ‘strong’ green belt purpose.</p> <p>The case for expanding an existing urban extension on the grounds that it helps support a new First School, should be irrelevant in terms of green belt policy and unjustified in</p>	Not stated	No	Not stated	<p>Land east of Bilbrook does not adjoin Wolverhampton and includes defensible boundaries to avoid risk of coalescence. The council’s Green Belt Study (2019) takes a strategic view for considering the harm of releasing land from the Green Belt. Its methodology ensures that if there are variations to the harm of releasing land from the green belt within the wider land parcel, then this is reflected in the assessment results.</p> <p>The Council considers that its approach to Green Belt land is consistent with national planning policy, demonstrating exceptional circumstances in a manner consistent with NPPF requirements. See the Green Belt Exceptional Circumstances Topic Paper 2024 for these.</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>planning terms.</p> <p>In conclusion, we are not convinced that the extension of the Policy SA1 (east of Bilbrook site) within the 2024 Publication Plan can be considered consistent with green belt policy and hence is unsound as being contrary to national policy within the NPPF and we consider it should be deleted in favour of other sites which have more consistency with green belt policy.</p>				No change proposed.
Stantec for L&Q Estates Ltd	AGT24-041-01-04	Policy SA1	Policies SA1 and SA2 are not considered to be sound as they are not positively prepared, not justified and not consistent with national policy. The updated 2024 Housing Site Selection Topic paper summarises Land at Yieldfields Farm (Site Ref: 492 a, b and c), in the context of the Council's new preferred spatial strategy (Option I), concluding that the land is not adjacent to a Tier 1 settlement and thus is not consistent with the preferred spatial strategy.	Not stated	No	Not stated	Details of the site assessment can be found on page 440 – 441 of Appendix Three of the Housing Site Selection Topic Paper 2024.
Evolve Planning & Design for Lovell Homes	AGT24-017-05-01	Policy SA1	Lovell Homes notes the identification of four strategic housing allocations and the included housing trajectory and considers a more detailed housing trajectory should be included to ensure the reliance on these strategic sites does not undermine the timely delivery of housing against a non-stepped trajectory.	Not stated	Not stated	Not stated	The Statement of Common Ground (SoCG) between South Staffordshire Council and the landowner / developer / agent for the two strategic sites will be published as part of the document library for the EiP. The SoCG's contain a detailed trajectory for delivery on these sites.
Evolve Planning & Design for Keon Homes	AGT24-017-04-01	Policy SA1	Keon Homes notes the identification of two strategic housing allocations and the included housing trajectory and considers a more detailed housing trajectory should be included to ensure the reliance on these strategic sites does not undermine the timely delivery of housing against a non-stepped trajectory.	Not stated	Not stated	Not stated	The Statement of Common Ground (SoCG) between South Staffordshire Council and the landowner / developer / agent for the two strategic sites will be published as part of the document library for the EiP. The SoCG's contain a detailed trajectory for delivery on these sites.
Evolve Planning & Design for Four Ashes Road Ltd	AGT24-017-03-01	Policy SA1	Four Ashes Road Ltd notes the identification of two strategic housing allocations and the included housing trajectory and considers a more detailed housing trajectory should be included to ensure the reliance on these strategic sites does not undermine the timely delivery of housing against a non-stepped trajectory.	Not stated	Not stated	Not stated	The Statement of Common Ground (SoCG) between South Staffordshire Council and the landowner / developer / agent for the two strategic sites will be published as part of the document library for the EiP. The SoCG's contain a detailed trajectory for delivery on these sites.
Evolve Planning & Design for Cameron Homes	AGT24-017-02-01	Policy SA1	Cameron Homes notes the identification of four strategic housing allocations and the included housing trajectory and considers a more detailed housing trajectory should be included to ensure the reliance on these strategic sites does not undermine the timely delivery of housing against a non-stepped trajectory.	Not stated	Not stated	Not stated	The Statement of Common Ground (SoCG) between South Staffordshire Council and the landowner / developer / agent for the two strategic sites will be published as part of the document library for the EiP. The SoCG's contain a detailed trajectory for delivery on these sites.
Evolve Planning & Design for Bloor Homes	AGT24-017-01-01	Policy SA1	<p>Additional Land East of Bilbrook –</p> <p>Bloor Homes recognises the importance of the two proposed strategic housing allocations in delivering the spatial strategy and supports the inclusion of site-specific policies to establish a vision for each site, alongside a requirement for a detailed</p>	Yes	Yes	Yes	<p>Comments noted.</p> <p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p>



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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>masterplan and design code.</p> <p>Bloor Homes supports the site Vision, Objectives and Concept Plan for Land East of Bilbrook contained within the Publication Plan. This will form the basis of further technical work. Inclusion of the additional land through SA1 would offer the opportunity to increase levels of housing delivery – approximately a further 150 dwellings and would align to the wider vision and objectives in SA1. A masterplan is attached at Appendix 2 to demonstrate how the additional land would form a logical extension to the site. Bloor Homes can demonstrate the additional land is suitable, available and achievable.</p>				
Evolve Planning & Design for Bloor Homes	AGT24-017-01-09	Policy SA1	<p>Land East of Bilbrook –</p> <p>Bloor Homes recognises the importance of the two proposed strategic housing allocations in delivering the spatial strategy and supports the inclusion of site-specific policies to establish a vision for each site, alongside a requirement for a detailed masterplan and design code.</p> <p>Bloor Homes supports the site Vision, Objectives and Concept Plan for Land East of Bilbrook contained within the Publication Plan. This will form the basis of further technical work. A Vision Document is attached to Appendix 2.</p> <p>Bloor Homes has agreements in place between the landowners, providing confidence that a comprehensive and co-ordinated approach to development can be achieved in its delivery. It can demonstrate the site is suitable, available and achievable.</p> <p>The site description can be found in paragraphs 12.3 – 12.8 of the representation. The Sustainability Appraisal, Sequential Test, Green Belt Harm, Landscape Sensitivity, impact on historic environment, surface water flooding, highways, impact on current land use, impact on natural environment and impact on environmental quality can be found in paragraphs 12.9 - 12.45. The site specific opportunities are set out in paragraphs 12.46 – 12.49.</p>	Yes	Yes	Yes	<p>Comments and confirmation of the delivery of the site are noted.</p> <p>No changes proposed.</p>
Berrys for John Davies Farms Ltd	AGT24-006-02-03	Policy SA1	<p>There is significant reliance on the delivery of housing on two strategic sites where considerable uncertainty remains over the potential rates of housing delivery. In addition, one of these sites will result in 'high' and 'very high' levels of harm to the Green Belt that could potentially be avoided by allocating land in other areas, such as land in Tier 4 settlements.</p> <p>As a consequence, the Plan is considered to be unsound as it is not justified (is an appropriate strategy, taking into account the reasonable alternatives) nor effective (deliverable over the Plan period).</p>	Not stated	No	Not stated	<p>The council's Green Belt Study (2019) takes a strategic view for considering the harm of releasing land from the Green Belt. Its methodology ensures that if there are variations to the harm of releasing land from the green belt within the wider land parcel, then this is reflected in the assessment results.</p> <p>No changes proposed.</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
RPS Group for IM Land	AGT24-036-01-05	Policy SA1	<p>RPS has raised concerns with the housing trajectory proposed in the second Reg 19 Plan, specifically the substantial reduction in housing delivery planned for in the early years of the plan period.</p> <p>At the site level, the trajectory is heavily dependent on the delivery of the two strategic sites at Bilbrook and Penkrige. The Council provides no evidence to substantiate their position that delivery rates will increase as much as suggested as a result of these sites coming forward.</p> <p>A recent review of housing delivery across the country indicates that sites in the region of 500-999 (Bilbrook) and 1,000-1,900 dwellings (Penkrige) could take between 5 to 6 years respectively to move from submission of an outline to first completion on site. On this basis, this would suggest that delivery on the two strategic sites won't deliver any homes until 2029 at the earliest (near the end of year 6 of the plan).</p> <p>However, the Council expects a significant ramping of delivery during 2028 (with commencement preceding that date). In our view, this raises further concerns that housing delivery in the first five years of the plan period, and maybe beyond that, could be severely restricted if the current strategy is taken forward. None of these factors have been accounted in the redrafting of the Reg 19 Plan. Taken together, the current strategy is not justified, will not be effective in its intended outcome, and is not consistent with national policy. It is not soundly-based.</p>	Not stated	No	Not stated	<p>Comments noted.</p> <p>The Council has been in regular communication with the site owners / promoters of the proposed strategic allocations and the trajectory has been informed by these discussions. In addition, a Statement of Common Ground (SoCG) between South Staffordshire Council and the landowner / developer / agent for the two strategic sites will be published as part of the document library for the EiP. The SoCG's contain a detailed trajectory for delivery on these sites.</p> <p>It is acknowledged that a review of housing delivery across the country may indicate that the delivery of the strategic allocations will occur later in the plan period, but this will be an average taken across numerous sites and does not preclude sites coming forward ahead of these average timescales. As the Council have been informed by the landowners / promoters of the proposed trajectory for the strategic sites, it is considered that this is a significant indication that the sites will come forward as detailed in the plan.</p>
Guy, S	RES24-091-01	Policy SA1	<p>Currently benefit from a rural feel when walking towards and onto Lane Green Road. I have seen some developments where the entrance to the development is a green space. Others are badly designed, lack green spaces and new houses are straight on to the road.</p> <p>We currently have hedgehogs, squirrels and other wildlife in the area and in our garden. If the area around Lane Green Road does not have any green spaces retained then I feel that the wildlife within Bilbrook could be affected.</p> <p>It would be a shame if the t-junctions, where Wesley Avenue and Oakfield Road meet Lane Green Road were to become crossroads. The rural feel, where the ends of the roads, look onto fields would be lost for the people already living in this area.</p> <p>The junction by the Woodman pub currently gets congested and could get more congested with the increase in traffic.</p>	Not stated	Not stated	Not stated	<p>Comments noted on the entrance to the site.</p> <p>The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to – identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact on habitats sites.</p> <p>SA1 details accesses to the site, including from Lane Green Road. However, details on the T-junctions will be assessed during the planning application stage.</p> <p>Engagement throughout plan preparation has taken place with Local Highways Authority (Staffordshire County Council). They have not indicated that the impact of the proposed allocation would not generate any significant</p>

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							impacts on the transport network or highway safety that cannot be mitigated in line with paragraph 114 d of the NPPF.
Lloyd, K	RES24-136-02	Policy SA1	<p>'Vehicular accesses onto Pendeford Mill Lane, Lane Green Road and Barnhurst Lane and appropriate public transport provision to support sustainable travel from the scheme' The reason Bilbrook has been chosen is its links to public transport. It cannot encourage residents to use public transport, active travel etc if it's making it easier to drive the car. Too many vehicle entrances will make the roads more dangerous to other road users trying to do the right thing such as cyclists.</p> <p>What does point f mean? There are already 2 football pitches in addition to many more on Burnhurst Lane (also in the parish of Bilbrook). Bilbrook has plenty of pitches, it doesn't need any more, please leave the open spaces alone. Not everyone plays football. An improved skateboard park or maybe a cycle track would be better.</p> <p>I would like to recommend the creation of a new right of way connecting green infrastructure. Leading from the Green Infrastructure Allocation at the south of the site to the Codsall Rd and beyond (using the national footpath network). Most of this path already exists, including a foot tunnel under the railway line (see attached picture). This path would support policy HC19 in the enhancement of a network of interconnected green and blue spaces. It would also provide a very enjoyable walk for all the residents of Bilbrook.</p>	No	No	Yes	<p>Engagement throughout plan preparation has taken place with Local Highways Authority (Staffordshire County Council). Whilst sustainable methods of transport are encouraged and planned for within the development, some vehicle use is inevitable, and access and egress to the site must be planned accordingly.</p> <p>A range of evidence pertaining to open space, sport, and recreation has been produced to inform the preparation of the local plan both in regard to draft policies and proposed site allocations. The Council considers the policies are satisfactory in securing an appropriate level of future multi-functional, publicly accessible, open space, and protecting existing sports facilities and pitches.</p> <p>The creation of a right of way would be undertaken by the County Council. The footpath appears to exist between the site and Codsall Road, but any right of way designation would need to be formalised by the County Council.</p>
Marrons Planning for Boningale Homes	AGT24-027-02-01	Policy SA1	<p>As is detailed in Appendix 1 of the SA, the Land East of Bilbrook the proposed allocation scores as follows; Landscape: scored major negative impacts Green Belt: scored major negative impacts Education: scored major negative impacts In addition to the above, we have some remaining concerns relating to land assembly matters, the commitment of the landowners to bring the site forward in line with the emerging trajectory and the viability of the proposed infrastructure required to make the site suitable for allocation.</p>	Not stated	No	Not stated	<p>The council's Green Belt Study (2019) takes a strategic view for considering the harm of releasing land from the Green Belt. Its methodology ensures that if there are variations to the harm of releasing land from the green belt within the wider land parcel, then this is reflected in the assessment results.</p> <p>A Statement of Common Ground (SoCG) has been drafted and signed by the landowner and Council signifying that the site is deliverable and the proposed trajectory for delivery was appropriate and realistic.</p>
CPRE West Midlands Regional Group	STA24-014-06	Policy SA1	<p>CPRE object to policy SA1. CPRE housing study identifies an oversupply of 2292 dwellings above requirements. The local plan should review allocations to consider if they are justified given constraints such as landscape, biodiversity and green belt.</p>	Not stated	Not stated	Not stated	<p>The Council considers that its approach to Green Belt land is consistent with national planning policy, demonstrating exceptional circumstances in a manner consistent with NPPF requirements. See the Green Belt Exceptional Circumstances</p>

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							Topic Paper 2024 for these
National Highways	STA24-032-01	Policy SA1	Policy SA1 – Strategic development location: Land East of Bilbrook – A minimum of 750 homes; principal impacts on the SRN are likely to be at the M54 J2 and J3.	Not stated	Not stated	Not stated	Comments noted.  No changes proposed.
National Highways	STA24-032-01	Policy SA1	With regards to policies SA1 and SA2, it was agreed with South Staffordshire Council (as local highways authority) that the SATURN model prepared for the M54 – M6 link road proposal will be used to determine the trip distribution and assignment of traffic for the Local Plan sites. It was also agreed that this data be provided to the site promoters and their advisors for their use in carrying out their own technical assessments. In consultation and agreement with us, such assessments will be used to identify the need for any form of any highway mitigation works on the SRN. We understand that this is still to be determined and we look forward to hearing from you in due course.	Not stated	Not stated	Not stated	Comments noted.  No changes proposed.
Harris, V	RES24-098-01	Policy SA1	The plan has not taken into consideration the huge disruption to Pendeford Mill Lane if the building went ahead, with years of roadworks and delays to the main route out of the villages. Building to the East of Bilbrook also poses a real risk of eventually becoming part of Wolverhampton City meaning lower house prices in the neighbouring areas and higher insurance premiums due to crime rates in Pendeford. The nearest high school and shops will be in Wolverhampton. There is also a large 4G mast in the middle of the site which likely causes ill-health effects, cancers, etc.	Yes	No	yes	Engagement throughout plan preparation has taken place with Local Highways Authority (Staffordshire County Council). They have not indicated that the impact of the proposed allocation would not generate any significant impacts on the transport network or highway safety that cannot be mitigated in line with paragraph 114 d of the NPPF.  Land east of Bilbrook does not adjoin Wolverhampton and includes defensible boundaries to avoid risk of coalescence. The council's Green Belt Study (2019) takes a strategic view for considering the harm of releasing land from the Green Belt. Its methodology ensures that if there are variations to the harm of releasing land from the green belt within the wider land parcel, then this is reflected in the assessment results.  The site is in a sustainable and well-connected location and will be able to access the existing shops and amenities on Bilbrook Road. The proposed development will likely include a small convenience retail store which will serve the day-to-day needs of the neighbourhood.
<b>POLICY SA2: STRATEGIC MASTER PLANNING LOCATION: LAND NORTH OF PENKRIDGE</b>							
Penkridge Parish Council	STA24-036-01	Policy SA2	In the present Review of the Local Plan it is proposed that some future housing growth may be inevitable/acceptable for the next	Not stated	Not stated	Not stated	The plan period for the Local Plan is to 2041 and therefore requires additional sites to be identified

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			<p>period 2028 to 2039 but only in a reasonable and well planned manner.</p> <p>This should include the 224 dwellings stated above with the benefit of planning permissions and also the possibility of approximately 160 dwellings from sites 005 and 006 making a total of 380 dwellings, which may be considered acceptable to the community to 2038.</p> <p>The Bloor and Cameron sites are an examples of piecemeal development and have not been designed or approved with the benefit of a Masterplan to incorporate the developments in an appropriate manner to fit in with existing Community and services of Penkridge. This leads to concerns about the possibility of allowing piecemeal development of the future land. The design of a Masterplan should include the centre of the village at its core.</p> <p>Any future housing developments around Penkridge should be designed to provide safe access and adequate cohesion with the Village centre.</p>				<p>and allocated to meet the local housing need.</p> <p>The council considers that all proposed allocations comply with the NPPF and the spatial strategy (identified in Policy DS5) insofar as they are located to deliver sustainable patterns of development that meet the authorities' identified housing need.</p> <p>The policy does allow for submission and approval of the SMP through the planning application stage where it precedes the adoption of the Local Plan, however it would be preferable for these to be submitted as part of pre-application discussions. It is likely that the masterplan for SA2 will be submitted through the planning applications.</p>
Environment Agency	STA24-019-01	Policy SA2	<p>We welcome the addition of a Level 2 SFRA. The Level 2 SFRA shows that the critical 1 in 100 year plus climate change flood extent encroaches (albeit largely into public open space) on sites 119a, 284, 139, Land North of Penkridge, SA1 and SA4. The SFRA confirms that for the majority of these sites the encroachment is only minor.</p> <p>All these sites will therefore require a site specific FRA which shows development laid out as to avoid the floodplain and finished floor levels 600mm above the 1 in 100 plus climate change flood level. This should be detailed within the allocation requirements. In addition, the quantum of development should be reviewed to ensure that it can fit onto the area outside the 1 in 100 plus climate change flood event, with particular note of 119a which shows about a third of the site affected by flooding.</p> <p>Although referenced within the Sustainability Appraisal it is unclear where the evidence sits to clearly demonstrate how the proposed site allocations have had the Sequential Test applied as is required by Paragraphs 161 and 162 of the NPPF. We recommend however given the proximity of the fluvial floodplain, residual risk should be mitigated for by it being required that finished floor levels are set at or in excess of 600mm above the 1 in 100 year plus climate change for that specific location.</p> <ul style="list-style-type: none"> <li>• Site Ref 617</li> <li>• Site Ref 646a.</li> <li>• Site Ref 646b</li> </ul>	Not stated	Not stated	Not stated	<p>Comments noted.</p> <p>Following the representation submitted by the Environment Agency during the 2022 Regulation 19 consultation, wording was added to sites 119a, 139, SA1, SA2 and 617 which should alleviate concerns raised –</p> <p>“Provide a site-specific FRA which shows development laid out as to avoid the floodplain and finished floor levels 600mm above the 1 in 100 plus climate change flood level.”</p>



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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
Environment Agency	STA24-019-01	Policy SA2	Lower Drayton Farm Anaerobic Digestion facility is permitted and regulated by the Environment Agency. The proposals put forward under site ref 420, 584 and 010 will bring housing development adjacent to the permitted area and potentially expose new residents to amenity issues such as odour and noise either from the permitted facility or waste haulage vehicles entering and exiting the site. We still have concerns about the indicative concept plan which includes a community park and other potential development site/sport pitches adjacent to the AD site. Development in these areas could place unreasonable restrictions or expectations on this existing facility as a result of development permitted after they were established. We recommend your planning policies ensure that appropriate assessment and mitigation can be carried out by the agent of change (ie residential allocations). Where any mitigation is not practical, properties should not perhaps be built close to the site perimeter. We recommend strategic policy SA4 references the risks associated with their proximity to such facilities, and the need for assessment and/or mitigation measures in order to inform and steer the masterplanning process.	Not stated	Not stated	Not stated	The policy was amended following the 2022 Regulation 19 consultation to address the concerns raised by the Environment Agency in regard to the Anaerobic Digestion Facility to read –  I) Consideration of potential amenity issues and any mitigation requirements as a result of proximity to the Anaerobic Digestion Facility to the north of the site.
Penkridge Parish Council	STA24-036-01	Policy SA2	A proposal by SCC to promote some land in their ownership for future housing to the west of Penkridge - this land may include a spine road running from the South with a connection from the A449 near Gailey to connect back to the A449 near Lower Drayton Lane to the North of Penkridge. The site 010 may be affected by this proposed route. Therefore the design of any Masterplan for the area should reserve this part of the route. Although it is suggested that traffic from the WMI may be constrained from using the A449, this will be of little effect should the M6 be shut and all traffic is diverted through Penkridge, which is a very regular occurrence. A new spine road would give an alternative relief for the centre of Penkridge.	Not stated	Not stated	Not stated	Engagement throughout plan preparation has taken place with Local Highways Authority (Staffordshire County Council). In addition, they will be a consultee on any planning application on this site and able to provide full and detailed comments on the proposed scheme, and the scheme amended if considered necessary.  No changes proposed.
Penkridge Parish Council	STA24-036-01	Policy SA2	Any new housing should connect with the village with alternative routes for roads, if possible, or at least alternative routes and links for footpaths and cycleways being designed and provided. There is a possible route for an alternative link from land to the north of Penkridge via a new bridge across the River Penk and the flood plain to the east toward the Teddesley Road and to connect to the schools and the Village Centre.  There are concerns that any development on the west side of the A449, to the north, will not have adequate and safe crossings and safe routes for pedestrians and cyclists to the Village centre, without following in close proximity to the busy and potentially dangerous A449 highway.  There are concerns that increased traffic from the new dwellings	Not stated	Not stated	Not stated	The council has included a sustainable transport policy (Policy EC12) that is considered to sufficient to address sustainable transport matters on a scheme-by-scheme basis. It will ensure that all development (including proposed allocations) maximises opportunities for walking, cycling, and public transport usage, and deliver expanded provision to meet increased cumulative demand for bus and rail services and connections.

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			may not be able find parking in the village centre for shopping and also at the Rail Station, which is now a major user in the region, mainly by non- residents of Penkridge to commute to work elsewhere.				
Staffordshire County Council	STA24-044-05	Policy SA2	<p>Provision for the development to the North of Penkridge does not take into account or make provision for the potential development to West of Penkridge as referred to in our representation to paragraphs 5.12-5.17 and Policy DS4.</p> <p>The proposals for the West of Penkridge include a spine road that would in effect become the A449 and allow the existing road through the historic centre of the village to be returned to local use and design. The new spine road is proposed to connect back to the A449 through the North of Penkridge site. Should this not be possible then further land to the north of the North of Penkridge allocation would need to be brought into the West of Penkridge proposal to facilitate the delivery of a re-routed A449. The Masterplanning for the West of Penkridge proposal includes in scenario 4 the north of Penkridge allocation site. We suggest that the alignment of the spine road through the allocation site be protected such that it doesn't obstruct or hinder the opportunity the West of Penkridge affords to the village. The County Council is willing to compensate the developers' of the North of Penkridge site for any developable land lost as result accommodating the spine road.</p> <p>Amend part (d) of the policy, which presently reads 'A transport strategy which includes consideration of accesses onto the A449, a gateway feature to the village on the site's northern edge and appropriate public transport provision to support sustainable travel from the scheme;' to A transport strategy which includes consideration of accesses onto the A449 including details to demonstrate how accommodation of West of Penkridge spine road can be provided for by the site layout and junction arrangement/s, a gateway feature to the village on the site's northern edge and appropriate public transport provision to support sustainable travel from the scheme;</p>	Yes	No	Yes	<p>All suitable sites that align with the preferred spatial strategy (Spatial Option I) have been identified, including sites at the Tier 1 settlements. The rationale for discounting the site west of Penkridge is set out in our Housing Site Assessment Topic Paper (2024).</p> <p>It is not considered appropriate for an allocated site to be designed to facilitate an omission site which may never come forward.</p>
Staffordshire County Council LLFA	STA24-044-19	Policy SA2	Flood Zone 2 and 3 along southern boundary, associated with River Penk. Surface water - significant surface water flow pathways transecting sites both east and west of A449.	Not stated	Not stated	Not stated	<p>A Flood Risk Assessment will be required as part of any planning application and mitigation measures will be implemented accordingly.</p> <p>No changes proposed.</p>
Sport England	STA24-042-02	Policy SA2	Improve clarity of policy to indicate the type and size of associated facilities	Yes	No	Yes	Point e) states that the sports pitches will be "full-size" to "meet national standard". The type and size of the associated facilities will be

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							ascertained during the planning application stage and will meet the identified need.
Walsingham Planning for Lidl	AGT24-044-01-01	Policy SA2	<p>Support the principle of SA2, the concern is the strategic allocation misses an opportunity to address an existing deficiency within the wider settlement by failing to include allocation of land for a supermarket.</p> <p>Separate representations have been made for Policy EC8, which highlight the need for a larger convenience store to serve Penkridge to cater for the existing community and new development.</p> <p>SA2 includes the requirement for a 'community hub' which should include 'local convenience retail to serve the new neighbourhood'. No level of floorspace is identified within the policy or concept plan but it seems likely that the convenience element will be no more than a neighbourhood shop (based on undetermined planning application).</p> <p>There are no sites of a suitable size for a supermarket in Penkridge, but there is within SA2 at the southern end of the allocation (ref 420), immediately adjoining the existing settlement boundary and has a main road frontage. A Lidl supermarket on site will cater for the day-to-day convenience needs of Penkridge and will be a suitable solution for convenience provision.</p> <p>SA2 is not sound because it has not been positively prepared, fails to consider existing and future needs of Penkridge and is not therefore effective.</p>	Yes	No	Yes	<p>Comments noted and a response to the representations made under EC8 will be provided in the relevant section of this document.</p> <p>It is not the role of the Local Planning Authority to identify particular providers for elements of proposed housing allocations. The Local Plan has identified a need for local convenience retail, but the quantum of floorspace and who/how this is provided will be decided through the masterplan and planning application for the site.</p> <p>No changes proposed.</p>
Cerda for Trine Developments	AGT24-011-01-01	Policy SA2	<p>We consider that the principle of the residential allocation of 'land north of Penkridge' under Policy SA2 within the publication plan to be sound – positively prepared, justified, effective and consistent with national policy.</p> <p>Site 420 stands as the most suitable location within this settlement for delivering growth. Its location near to Penkridge centre benefits both our site and Penkridge as a whole, as it will support the existing services and facilities and make a wider contribution to the needs for growth in South Staffordshire. Full site details can be found in the full representation.</p> <p>The concept of the preparation of strategic master plans and indicative concept plans to support the play for key strategic sites is certainly supported in principle.</p>	Yes	No	Yes	<p>Comments and support for the residential allocation of SA2 noted.</p> <p>No changes proposed.</p>
Cerda for Trine Developments	AGT24-011-01-01	Policy SA2	<p>Generally the policy requirements do not take account of the different land ownership interests. Trine holds a smaller parcel of the allocation and has not been part of any master-planning to</p>	Yes	No	Yes	<p>Comments noted.</p> <p>Floorspace and use classes in relation to the</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>date.</p> <p>Whilst we do not object to the principle of a Community Hub, evidence of the need for such uses must be presented for that requirement to be justified. All of SA2 is within a mile of the services and facilities of Penkrudge. If the requirement is retained, the policy should be updated to give specific guidance in relation to floorspaces and use classes.</p> <p>Trine hold no interests beyond their site boundary and would be unable to deliver any requirements beyond their land ownership.</p>				community hub have not been identified within the policy as it ensures the policy remains flexible enough to meet the needs of the local area / residents when the planning application for the site is assessed.
Lichfields for St Philips	AGT24-026-02-01	Policy SA2	St Philips support the allocation of SA2, are in control of parcel 010 and are committed to bringing forward a comprehensive scheme for the site's development. The site is not environmentally sensitive and is not subject to insurmountable constraints.	Not stated	No	Not stated	<p>Comments noted.</p> <p>No changes proposed.</p>
Lichfields for St Philips	AGT24-026-02-01	Policy SA2	<p><b>Transport &amp; Drainage</b> A Strategic Transport Assessment has been prepared in relation to the site. Development of the site is acceptable in principle subject to significant highway improvements, new junctions of the A449, and public transport provision. Proposed improvements would improve accessibility between the site and the services and facilities in the village centre and would promote active sustainable movements.</p> <p><b>Flood Risk &amp; Drainage</b> The vast majority of the site falls in flood zone 1, the eastern margins are in flood zone 3 and act as the functional floodplain for the River Penk. Vast majority of the site is at very low risk of surface water flooding. Detailed consideration has been given to the site's drainage strategy and demonstrates that the areas of flood risk can be accommodated within the proposed country park.</p> <p><b>Landscape &amp; Visual Impact</b> St Philips do not agree with the findings of the Landscape Sensitivity Assessment (details in full representation). It did not consider the committed development to the north of Penkrudge that is now being delivered and also included an area of more sensitive land to the west of the railway line, and therefore was not accurately assessed. The site is not subject to any landscape designations and does not constitute a valued landscape.</p> <p><b>Ecology &amp; Arboriculture</b> No concerns in relation to ecology or arboriculture, confirmed by assessments of the site.</p>	Not stated	No	Not stated	<p>Comments on transport &amp; drainage, flood risk &amp; drainage, ecology &amp; arboriculture and cultural heritage &amp; archaeology are noted.</p> <p>Landscape sensitivity has been assessed through the Landscape Sensitivity Study. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that better perform as sustainable allocations.</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			Cultural Heritage & Archaeology The Council's Historic Environment Site Assessment confirmed the historic impact for the site has been revised to 'low'.				
Lichfields for St Philips	AGT24-026-02-01	Policy SA2	<p>Concept Plans and Masterplans St Philips support the vision of creating a sustainable extension and new neighbourhood and the vision and objectives for the development are entirely appropriate, and the Concept Plan sets out the broad principles. As set out in MA1, it is important the Council recognise that those plans only illustrate a vision. The Concept Plan has not been informed by detailed technical assessments. It is critical that Concept Plans are sufficiently flexible to allow for SMPs / detailed design scheme to depart from Concept Plans in some places.</p> <p>Emerging Masterplan Paras 2.42 – 2.46 of the full representation cover the details of the Emerging Masterplan only.</p> <p>Policy Requirements The policy sets out a number of specific requirements for the development which are largely appropriate, except the following clauses where some revisions are required to ensure the soundness of the policy (all detailed changes in Para 2.47 in the full representation). Amendments to the policy are detailed in Para 2.49 and 2.50 of the full representation.</p> <p>Amendments requested –</p> <p>Clause B – “flexible community space <b>(either on-site or contributions, as appropriate)</b>”</p> <p>Clause E – “the provision of sports pitches <b>of a type and size determined by up-to-date evidence and engagement with the local community</b>”</p> <p>Clause G – remove reference to Concept Plan and delivery of a large central green space</p> <p>Clause H – removed and the requirement for mitigatory planning subsumed into Clause G</p> <p>Clause I – “offsite infrastructure, including highways and active travel mitigation measures, education, leisure, health and potentially community facilities <b>(if not provided on-site)</b>”</p>	Not stated	No	Not stated	<p>Comments noted.</p> <p>Text within Policy MA1 states that the concept plans for the strategic sites are “indicative” and will “form the basis for more comprehensive masterplans and design codes”.</p> <p>Clause B cannot be amended as it is not possible to quantify the contributions that would be required for the flexible community space if it were not provided on-site.</p> <p>Clause E can be amended as requested; however, it is considered essential that “consultation with Sport England” is added to this clause to ensure that appropriate facilities are provided.</p> <p><b>Minor modification 007: “the provision of full-size sports pitches of a type and size determined by up-to-date evidence, consultation with Sport England, and engagement with the local community.”</b></p> <p>It is considered unnecessary to remove the reference to the Concept Plan in Clause G as it informs the indicative layout of the site. “Central” can be removed from the delivery of green space.</p> <p><b>Minor modification 008: “including an accessible central green space or spaces at the heart of the development”</b></p> <p>Clause H will not be removed, and the proposed amendment to Clause I will not be incorporated.</p>
Stantec for L&Q Estates Limited	AGT24-041-01-04	Policy SA2	Policies SA1 and SA2 are not considered to be sound as they are not positively prepared, not justified and not consistent with national policy. The updated 2024 Housing Site Selection Topic paper summarises Land at Yieldfields Farm (Site Ref: 492 a, b	Not stated	No	Not stated	Details of the site assessment can be found on page 440 – 441 of Appendix Three of the Housing Site Selection Topic Paper 2024.



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			and c), in the context of the Council's new preferred spatial strategy (Option I), concluding that the land is not adjacent to a Tier 1 settlement and thus is not consistent with the preferred spatial strategy.				
Berrys for John Davies Farms Ltd	AGT24-006-02-03	Policy SA2	There is significant reliance on the delivery of housing on two strategic sites where considerable uncertainty remains over the potential rates of housing delivery.	Not stated	No	Not stated	The Statement of Common Ground (SoCG) between South Staffordshire Council and the landowner / developer / agent for the two strategic sites will be published as part of the document library for the EiP. The SoCG's contain a detailed trajectory for delivery on these sites.
Rapleys LLP for Vistry Group	AGT24-035-01-05	Policy SA2	<p>This site is 51ha in size and sits to the north of Penkrige, which is a tier one town. Whilst a tier one town, there are limited facilities within Penkrige with just local convenience store. Whilst the concept plan identifies the fairly recent anaerobic digestion plant to the north-east of the site, there is little if no consideration of the implications of this through design. Any new strategic housing scheme directly adjacent to such a sensitive industrial use would therefore need to take into account this use and the associated large buffer area.</p> <p>It is also important to note, that Penkrige is almost entirely reliant on the A449 for access. This is a single carriageway road running north south through the centre of Penkrige. It is noted that the site is located in close proximity to the M6, however junctions 12 and 13 are both located in the region of 4km away to the south and north. Based on the above, and given the number of uncertainties, Vistry maintain that it is not possible to determine the level of housing and development that the allocation can provide and deliver by 2041. It is highly likely that the total capacity will be below the 1,029 currently proposed.</p>	Not stated	No	No	<p>The policy was amended following the 2022 Regulation 19 consultation to address the concerns raised by the Environment Agency in regard to the Anaerobic Digestion Facility to read –</p> <p>I) Consideration of potential amenity issues and any mitigation requirements as a result of proximity to the Anaerobic Digestion Facility to the north of the site.</p>
Pland Estates Ltd	AGT24-033-01-01	Policy SA2	It is noted that part of the draft allocation as per detailed permission (ref 19/00862/REM for up to 200 dwellings is complete so should be removed from the allocation. The allocation north of Penkrige should be reduced to 905 dwellings to reflect out applications on the site.	Yes	No	Yes	The previous permission (19/00862/REM) does not form part the proposed allocation and therefore the capacity of the site is considered realistic and in accordance with policy requirements. No changes proposed.
CPRE West Midlands Regional Group	STA24-014-06	Policy SA2	CPRE object to policy SA2. CPRE housing study identifies an oversupply of 2292 dwellings above requirements. The local plan should review allocations to consider if they are justified given constraints such as landscape, biodiversity and green belt.	Not stated	Not stated	Not stated	The Council considers that its approach to Green Belt land is consistent with national planning policy, demonstrating exceptional circumstances in a manner consistent with NPPF requirements. See the Green Belt Exceptional Circumstances Topic Paper 2024 for these.
National Highways	STA24-032-01	Policy SA2	Policy SA2 – Strategic development location: Land North of Penkrige: A minimum of 1,029 homes; greatest traffic impacts are likely to be at M6 J13 and A5/A449 Gailey roundabout.	Not stated	Not stated	Not stated	Comments noted. No changes proposed.

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			The housing allocation site is separated from the boundary of the M6 motorway by an area of "green infrastructure" and the River Penk. In terms of the design of this green infrastructure, it will be necessary to consider the need for inclusion of any environmental mitigation measures, for example noise attenuation to meet the requirements as set out in the Department for Transport Circular 01/2022. It is also noted that the green infrastructure boundary is close to an Air Quality Management Area (AQMA 1 Woodbank) declared by South Staffordshire Council in 2006.				
National Highways	STA24-032-01	Policy SA2	With regards to policies SA1 and SA2, it was agreed with South Staffordshire Council (as local highways authority) that the SATURN model prepared for the M54 – M6 link road proposal will be used to determine the trip distribution and assignment of traffic for the Local Plan sites. It was also agreed that this data be provided to the site promoters and their advisors for their use in carrying out their own technical assessments. In consultation and agreement with us, such assessments will be used to identify the need for any form of any highway mitigation works on the SRN. We understand that this is still to be determined and we look forward to hearing from you in due course.	Not stated	Not stated	Not stated	Comments noted.  No changes proposed.
Hancher, R	RES24-095-01	Policy SA2	The selection of the site appears to be based on it having good public transport links. As rail services have been reduced, and bus services similarly reduced, I do not believe that this has been taken into account. The reduced public transport at this location will lead to an unmanageable increase in road traffic. Public transport provision should be increased, or the site should be deselected and development moved to a location which has the necessary public transport infrastructure.	No	No	No	The council has included a sustainable transport policy (Policy EC12) that is considered to sufficient to address sustainable transport matters on a scheme-by-scheme basis. It will ensure that all development (including proposed allocations) maximises opportunities for walking, cycling, and public transport usage, and deliver expanded provision to meet increased cumulative demand for bus and rail services and connections.
Define Planning and Design Ltd for Bloor Homes	AGT24-014-01-03	Policy SA2	The approach to directing growth to Land North of Penkridge, a suitable, available and deliverable site to the north of a sustainable settlement, is sound. However, to ensure that the policy is sound, some minor amendments are required to the policy requirements as set out in Policy SA2.  The policy should make clear that the Concept Plan is only a concept, and should make clear that the SMP, which is informed by technical assessments, holds greater weight and may identify that specific elements of the Concept Plan are not appropriate / feasible / deliverable. Policy SA2 should be amended accordingly, and should make clear that the technical assessments of the site are determinative.  The policy requirements should be amended as follows: • Clause A should be amended to require "a residential capacity	Yes	No	No	Comments noted.  Text within Policy MA1 states that the concept plans for the strategic sites are "indicative" and will "form the basis for more comprehensive masterplans and design codes".  It is not considered necessary to amend the capacity of the site as a whole, this has been informed by detailed discussions with all landowners and current planning applications.  Clause B cannot be amended as it is not possible to quantify the contributions that would be required for the flexible community space if it were not provided on-site.

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>reflecting an efficient use of land that responds to the site's characteristics and the surrounding context, expected to be approximately 1,000 homes, including affordable housing and a specialist elderly housing element (e.g. sheltered or extra care) of at least 40 units in accordance with other policies within the local plan."</p> <ul style="list-style-type: none"> <li>• Clause B should be amended to require a new first school site of 1.2 hectares, reflecting the feedback received from SCC Education.</li> <li>• Clause B should be amended to require "small-scale, flexible community space (either on-site or contributions, as appropriate)."</li> <li>• Clause E should be amended to seek "the provision of sports pitches of a type and size justified by up-to-date evidence and engagement with the local community."</li> <li>• Reference to the Concept Plan should be removed from Clause G.</li> <li>• Reference to the delivery of a large central green space should be removed from Clause G.</li> <li>• The requirement for the delivery of "additional compensatory Green Belt improvements" should be removed from Clause G as the site does not fall within the designated Green Belt.</li> <li>• Clause H should be removed and the requirement for mitigatory planting could be subsumed into Clause G.</li> <li>• Clause I should be amended to refer to how necessary contributions should be provided towards "offsite infrastructure, including highways and active travel mitigation measures, education, leisure, health and potentially community facilities (if not provided on-site)."</li> <li>• The policy should also refer to the Infrastructure Delivery Plan (IDP) and clarify that contributions must be demonstrated as being CIL Regulation 122 compliant.</li> <li>• The IDP should be amended to reflect the above comments.</li> </ul>				<p><b>Minor modification 006: "A new first school (1.5ha) (1.2ha)"</b></p> <p>Clause E can be amended as requested; however, it is considered essential that "consultation with Sport England" is added to this clause to ensure that appropriate facilities are provided.</p> <p><b>Minor modification 007: "the provision of full-size sports pitches of a type and size determined by up-to-date evidence, consultation with Sport England, and engagement with the local community."</b></p> <p>It is considered unnecessary to remove the reference to the Concept Plan in Clause G as it informs the indicative layout of the site. "Central" can be removed from the delivery of green space.</p> <p><b>Minor modification 008: "including an accessible central green space or spaces at the heart of the development"</b></p> <p>Clause G does not have reference to "additional compensatory Green Belt improvements".</p> <p>Clause H will not be removed, and the proposed amendment to Clause I will not be incorporated.</p>
Harper-Wallis, S	STA24-022-01	Policy SA2 (Appendix F)	<p>The Master Plan for the north of Penkridge is not in line with current outstanding planning applications from the prospective developers. These plans include the school and retail facilities in a new location with a new land owner providing them. The master plan must reflect what developers deem to be fit for purpose as reflected in their planning applications.</p> <p>The school and retail facilities should be located in line with developer expectations.</p>	Yes	No	Yes	<p>The plan in Appendix F for North of Penkridge is a high-level concept plan only.</p> <p>A Master Plan will be required as part of Policy MA1 for the proposed strategic allocations.</p> <p>No changes proposed.</p>
<b>POLICY SA3: HOUSING ALLOCATIONS</b>							
<b>General</b>							
Rapleys LLP for Vistry Group	AGT24-035-01-	Policy SA3	Policy SA3 identifies a number of housing allocation that are carried forward from the 2018 adopted Site Allocations	Not stated	No	No	The Strategic Growth Study (SGS) 2018 quantified the shortfall and made spatial

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
	05		<p>Document on safeguarded land. It is some six years since these sites were allocated/identified, and yet the majority have not come forward for development. Vistry considers this raises questions about their realistic deliverability and capacities within the plan period. The housing sites 285/459, also contain three parallel high voltage electricity power lines running across the site meaning that significant mitigation would be required and again potentially affecting site capacities. Vistry considers that Tier 2 (and below) settlements cannot sustainably accommodate such large increases in housing and that a proportion of this should be directed back to sustainable Tier 1 settlements, notably Bilbrook. Policy NB2 requires a minimum of 10% biodiversity net gain, is not clear to what extent the site capacities of the allocated sites (strategic or otherwise) have taken this into account – this is particularly pertinent to those allocated sites brought forward from the adopted Site Allocation Document given this predates the Environment Act</p>				<p>recommendations based on this in 2017/18, this is now 6 years old and so it is the council's position that this is out of date evidence. This is supported by the fact that there is a commitment to update the SGS across the HMA, including from South Staffordshire Council.</p> <p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024. This includes constraints identified on sites.</p> <p>The council considers that all proposed allocations comply with the NPPF and the spatial strategy (identified in Policy DS5) insofar as they are located to deliver sustainable patterns of development that meet the authorities' identified housing need. Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The SAD identified safeguarded land for longer term development needs, a number of those sites are now proposed for allocation through the Local Plan. These sites did not have a capacity allocated against them in the SAD and therefore the requirement for 10% biodiversity net gain under both national and local requirements has been fully accounted for in the capacity for each site.</p>
Farrier, P	RES24-067-01	Policy SA3	<p>Look at revising current housing planning in Kinver especially in White Hill and beyond, especially as housing targets are now advisory rather than mandatory. Cannot keep providing space for the greater Midlands at the expense of losing Green belt land.</p>	Not stated	Not stated	Not stated	<p>There is one site proposed for allocation in Kinver in the Local Plan under site reference 274. It includes a section of land which has planning permission, and the remaining land is safeguarded land from the Site Allocations Document (SAD) 2018. The justification for removing the site from the Green Belt is detailed in full in the SAD.</p> <p>The strategy for limiting growth to Kinver by allocating existing safeguarded land is considered</p>

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							<p>appropriate for a Tier 2 settlement given its level of services and facilities.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p>
Thomas, J	RES24-236-01	Policy SA3	<p>Codsall has a complete disproportionate number of housing allocations with respect to the rest of south staffs. The infrastructure is unable to support in its present state, let alone with so many additional houses.</p> <p>There is provision for an additional road linking Wergs hall to keepers lane as more vehicles try to cut through. This will only add to the congestion created at birches bridge.</p>	No	No	Yes	<p>The Rural Services and Facilities Audit 2021 informs the spatial strategy set out in Policy DS5. It is considered that this takes a balanced approach that will lead to a sustainable pattern of development by focusing growth of the district's most sustainable Tier 1 settlements. The strategic approach does still allow for limited development in lower Tier 4 and 5 settlements, including limited affordable housing.</p> <p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024. The plan includes strong design (Policy HC10), open space (Policy HC17), education (Policy HC15) and health (Policy HC14) policies to ensure that new development is of high quality and delivers the necessary infrastructure.</p>
CPRE West Midlands Regional Group	STA24-014-06	Policy SA3	<p>CPRE object to policy SA3. CPRE housing study identifies an oversupply of 2292 dwelling above requirements. The local plan should review allocations to consider if they are justified given constraints such as landscape, biodiversity and green belt.</p>	Not stated	Not stated	Not stated	<p>The Council has applied the Standard Method formula as set out in the NPPF correctly when arriving at our Local Housing Need between 2023 and 2041 of 4086 dwellings, equating to 227 dwellings per annum.</p>
National Highways	STA24-032-01	Policy SA3	<p>Policy SA3 sets out the non-strategic housing allocations identified to meet the District's housing target up to 2041. We acknowledge that the growth is largely planned to cover the most accessible and sustainable locations within the district, particularly focused on Tier 1 settlements such as Penkrudge, Codsall, Bilbrook, etc.</p>	Not stated	Not stated	Not stated	<p>Comments noted.</p> <p>No changes proposed.</p>
National Highways	STA24-032-01	Policy SA3	<p>At such time these sites come through the planning application process, we will need to be consulted at an early stage to ensure appropriate assessments are carried out in accordance with DfT Circular 01/2022 and the Design Manual for Roads and Bridges (DMRB) guidelines. This is to identify the need for, and form of any mitigation required for the SRN.</p> <p>Details on these smaller sites will be required in terms of the proposed boundary treatments to the SRN including any</p>	Not stated	Not stated	Not stated	<p>Comments noted.</p> <p>Site-specific details will be assessed through a planning application.</p>



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			necessary environmental mitigation, for example noise attenuation and surface water drainage to demonstrate compliance with the DfT Circular 01/2022. The formation of any new junction on the SRN will need to be compliant with the DfT Circular 01/2022 and DMRB standards. Similarly, where existing site access arrangements which interface with the SRN are identified for use, any existing non-DMRB compliant features which cannot be improved to current DMRB standards will need to be the subject of appropriate Departures from Standard and DfT Circular 01/2022.				
<b>Bilbrook: Site 213 – Bilbrook House</b>							
Staffordshire County Council LLFA	STA24-044-19	Policy SA3	Ref 213 - Bilbrook House Surface water - minor ponding on site- and a flow pathway along Carter Avenue.	Not stated	Not stated	Not stated	Comments noted.
<b>Bilbrook: Omission sites</b>							
Evolve Planning & Design for Bloor Homes	AGT24-017-01-01	Policy SA3	Additional land east of Bilbrook The site description can be found in paragraphs 5.3 – 5.8 of the full representation – two parcels in agricultural use defined by managed hedgerows extending to approximately 4ha. Delivery of approximately 900 new homes, centrally located first school, mixed-use community hub, green and blue infrastructure, amenity greenspace and equipped play (all in conjunction with SA1). Full details of the Sustainability Appraisal findings, Sequential Test, Green Belt Harm, Landscape Sensitivity, impact on the Historic Environment, Surface Water Flooding, Highways, impact on current land use, impact on natural environment, impact on environmental quality and site-specific opportunities can be found in paragraphs 5.9 – 5.39 of the full representation. There is an agreement in place between the landowner and Bloor Homes to facilitate the development of the site. Information gathered to date concludes there are no physical or other constraints likely to render the site undeliverable within the proposed plan period. The site is deliverable and immediately available.	Not stated	Not stated	Not stated	Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.  Justification for the council’s spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district’s growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan’s ability to deliver housing growth.  The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council’s Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).
Rapleys LLP for Vistry Group	AGT24-035-01-06	Policy SA3	Omission site: Land South of Pendeford Hall Lane, Bilbrook  The Vistry site at Pendeford Hall Lane is both viable and deliverable within the 2041 Plan period. It is not dependent financially on the delivery of major road or rail infrastructure. The site can start to deliver housing earlier in the plan period, fits perfectly with the development strategy of the local plan. All of the land required to enable the development of a new settlement is in the control of a national housebuilder/master developer. It is unconstrained environmentally and is	Not stated	No	No	Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.  Justification for the council’s spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper

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			unconstrained by any need to divert utilities or services. Its viability means that it can deliver policy compliant levels of affordable housing has no access constraints and is predicated on a clear access and mobility strategy which enshrines the principles of safe, sustainable travel				2024.This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.  The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).
<b>Codsall: Site 419a&amp;b - Land at Keepers Lane and Wergs Hall Road</b>							
PlanIT Planning & Development for Messer's Jenks and Letts	AGT24-032-03-07	Policy SA3	Support the identification of land at Keepers Lane and Wergs Hall Road as a residential development site within the Plan. We do, however, consider that there is potential to increase the size of this allocation to encompass land adjacent to its southern boundary. Policy SA3 should be amended to include the additional land which is identified by these representations within the list of allocated sites for a minimum capacity of 65 homes. The Plan is presently unsound because of its failure to identify Safeguarded Land to meet the district's longer term housing needs without further reviews of the district's Green Belt boundaries. If this site is not included as an allocation, it should be identified as Safeguarded Land within a new policy.	Yes	No	Yes	Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024. The plan includes strong design (Policy HC10), open space (Policy HC17), education (Policy HC15) and health (Policy HC14) policies to ensure that new development is of high quality and delivers the necessary infrastructure.  The Council considers that it would be inappropriate to release additional land from the Green Belt for safeguarded land through this Local Plan, given the need for any such release to be justified by exceptional circumstances. It is acknowledged that the approach to future Green Belt release will be considered through an updated Strategic Growth Study across the GBBCHMA which South Staffordshire will be an active partner in, and it is right to consider this issue strategically across this wider functional geography. To date, no GBBCHMA authority has requested that South Staffordshire provide additional safeguarded land for longer term unmet needs, nor has this been required in recent examinations in the GBBCHMA. Given these factors and the requirement in national policy to review the plan in whole or in part every 5 years, it is not considered appropriate or necessary to release safeguarded land at this stage.
Staffordshire County Council LLFA	STA24-044-19	Policy SA3	Site 419a & b - Land at Keepers Lane and Wergs Hall Road Surface water - minor ponding.	Not stated	Not stated	Not stated	Comments noted.

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
PlanIT Planning & Development for Miller Homes	AGT24-034-04-10	Policy SA3	Miller Homes control and are promoting land at Keepers Lane / Wergs Hall Road for 317 dwellings. Miller Homes wholly support the principle of the allocation but wish to submit important clarification on the wording of the allocation policy. Miller Homes have tested the capacity of the allocation through masterplanning and technical work and this has demonstrated that the site is capable of delivering a scale of development which far exceeds the 317 homes referenced in the policy. Although this figure is expressed as a 'minimum', it is well short of the numbers which could be built on this site – which is 340 – 400 dwellings. A supporting concept plan is provided to illustrate how development can deliver on many of the policy objectives and accommodate the higher number of dwellings. The policy should be revised to state the site can deliver a minimum of 340 dwellings.	Yes	No	Yes	Comments and support noted.  The proposed allocation of 317 dwellings is a minimum requirement.
<b>Codsall: Site 224 – Land adjacent to Station Road</b>							
Staffordshire County Council LLFA	STA24-044-19	Policy SA3	Ref 224 - Land adjacent to Station Road, Codsall Surface water - major flow pathway and associated floodplain associated with watercourse(s) and waterbody to the south.	Not stated	Not stated	Not stated	Comments noted.
Pegasus Group for Richborough Estates	AGT24-032-05-27	Policy SA3	The site details can be found in paragraphs 5.1 – 5.5 of the full representation (Station Road). The proposed development and vision document can be found in paragraphs 5.6 – 5.7. Details on the following can be found in the full representation – Codsall and its services (paragraphs 5.8 – 5.18), Sustainability Appraisal (paragraphs 5.19 – 5.23, Green Belt (paragraphs 5.24 – 5.27), Green Belt Purposes (paragraphs 5.28 – 5.47), Landscape Sensitivity (paragraphs 5.48 – 5.53), Sustainability (paragraphs 5.54 – 5.57), Impact on the Historic Environment (paragraphs 5.58 – 5.60), Surface Water Flooding (paragraphs 5.61 - 5.62), Highways (paragraphs 5.63 – 5.64), Impact upon the Natural Environment (paragraph 5.65), Site Specific Opportunities (paragraphs 5.66 – 5.68), Suitability / Deliverability / Availability (paragraphs 5.69 – 5.73). It is requested that the north-west portion of the site remains within the Green Belt, with open space proposed at this location. Retaining this portion in the Green Belt will allow the developer to provide Green Belt compensation.	Yes	No	Yes	Comprehensive details on the site, and support for the delivery of the site noted.  The council will expect compliance with Policy DS2, which does allow for a financial contribution to Green Belt compensatory measures should it be unable for these to be provided on the ground.
<b>Codsall: Site 228 – Former adult training centre off Histons Hill</b>							
Staffordshire County Council LLFA	STA24-044-19	Policy SA3	Ref 228 - Former Adult Training Centre off Histons Hill Surface water - minor ponding.	Not stated	Not stated	Not stated	Comments noted.
<b>Codsall: Omission sites</b>							
Acres Land and Planning for	AGT24-001-01-	Policy SA3	General concerns about the soundness of the housing allocations policy and specific objections to the exclusion of the Sandy Lane,	Not stated	No	Not stated	Site options have been assessed against a consistent set of planning criteria to determine

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
Hallam Land Management	01		<p>Codsall site. We feel that the Council should not put too much focus on large strategic sites which may be slow to come forward and be affected by infrastructure delivery issues. More sites should be allocated in Tier 1 settlements such as Codsall/Bilbrook which are closer to services and facilities, more accessible and more consistent with green belt policy. However, sites need to be avoided which would create coalescence with Wolverhampton, as the 'East of Bilbrook site will undoubtedly do. The plan includes limited flexibility of 10% overall including the windfall sites. Normally, plans would expect to provide much greater flexibility allowance. This demonstrates that the plan has not been positively prepared. We are also concerned that the Housing Site Selection paper gives far too much emphasis to infrastructure contributions which ought not to be a major factor in choosing sites in the first instance.</p> <p>Site 222 should be allocated as it is more consistent with green belt release policy insofar as there is no risk of coalescence with major towns and cities, has easy access to local services and facilities,3. The site is now effectively surrounded on three sides by development.</p> <p>Assessment of landscape sensitivity of the site is flawed as it is absorbed into a larger land parcel for assessment which includes the conservation area which distorted its true character.</p> <p>Site is north of Codsall/Bilbrook so aligns with the Strategic Growth Study 2018 recommendation, unlike the allocation east of Bilbrook.9. The Council indicates that the willingness to provide a school within the scheme is an important consideration which favours the allocation of sites (such as 'East of Bilbrook). However, our clients were not contacted about the desire by SSDC to provide a new First School on their site. We are not convinced that the selection procedure has been fair and impartial in this case which we feel renders the Publication Plan unsound.</p>				<p>proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024.This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The Council has included a buffer in housing supply above its proposed requirement which will provide around 10% plan flexibility (as set out in Policy DS4) to allow for any uncertainties around site delivery. It has worked proactively with site promoters and infrastructure providers on its two strategic allocations (Policies SA1-2) to masterplan the sites and create greater certainty over site delivery. The vast majority of sites in the plan are unconstrained greenfield sites and the Council has a very strong track record of delivering major schemes, with only two full applications lapsing over a period of 27 years (1996-2023) as detailed further on our Housing Monitoring and Five-Year Land Supply 2022-2023 document. Given the mix of sites proposed in the plan, the Council therefore consider the 10% plan flexibility to be appropriate.</p>
Marrons Planning for Boningale Homes	AGT24-027-02-01	Policy SA3	<p>Omission Site: Codsall South Option 1</p> <p>The subject site comprises land either side of Heath House Lane, Codsall (Figure 1) measuring 34.72 ha. The site is located in the Green Belt and lies directly to the south of the existing built form comprising the development edge of Codsall. An outline planning application is being prepared and is expected to be submitted in the coming weeks. The proposed development will comprise the following; Up to 450 residential dwellings; 70 Unit Extra Care Facility; 2/3 FE Primary School and Nursery; and New Gateway Spine Road into Codsall.</p>	Not stated	No	Not stated	<p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024.This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			The proposed residential-led development of the site would provide an opportunity to connect well with the future development of the land at Old Wergs Road. Within South Staffordshire, Codsall is the closest tier 1 settlement to the Black Country and as such, is considered the most suitable location for development that can meet both the needs of South Staffordshire, but also the unmet needs of the Black Country. The site is within Flood Zone 1 and there are no listed buildings within the site.				plan's ability to deliver housing growth.  The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).
Marrons Planning for Boningale Homes	AGT24-027-02-01	Policy SA3	Omission Site: Codsall South - Option 2 Option 2 comprises a smaller development, to the east of Heath House Lane. The same principles apply with regard to the supporting suite of technical information and location outside of any significant constraints, save for Green Belt. The site is capable of accommodating up to 150no. residential dwellings and is again considered to be immediately available, achievable and deliverable.	Not stated	No	Not stated	Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.  Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.  The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).
<b>Cheslyn Hay: Site 523 – Land east of Wolverhampton Road</b>							
Cheslyn Hay Parish Council	STA24-011-01	Policy SA3	Allocation of site 523 land east of Wolverhampton Road is unsound. Site allocations in Cheslyn Hay are contrary to policies EC8, HC14, HC15, HC17 and HC19 and a thorough assessment to establish capacity is essential to ensure that the roads, sewers, schools and community facilities can accommodate any additional housing before any further planning permission is granted in both Parishes. Concerns relating to environmental impact, highway safety and residential amenity.	Not stated	No	Not stated	The Council's Rural Services and Facilities Audit (2021) identifies Cheslyn Hay and Great Wyrley as some of the district's most sustainable locations and Tier 1 settlements. Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024. The plan includes strong design (Policy HC10), open space (Policy HC17), education (Policy HC15) and health (Policy HC14) policies to ensure that new development is of high quality and delivers the necessary infrastructure.



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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
Staffordshire County Council	STA24-044-04	Policy SA3	In respect to Site Allocation 523 (p.g 178, appendix C) Land East of Wolverhampton Road which is adjacent to Campions Wood Quarry. We think it is necessary to include and keep key requirement "Site layout and design to be based on an environmental assessment that takes into account permitted mineral operations and avoids additional restrictions being imposed on those operations." For information, the County Council is dealing with an application of a revised restoration scheme to achieve long term stability of slopes involving the importation of inert materials at Campions Wood Quarry (ref: SCC/24/0014/FULL-MAJ) which would achieve an earlier restoration of the quarry than currently planned (i.e. restoration to commence by at least 21 February 2042 – Condition 6 of permission SS.09/08/611 M).	Yes	Yes	Yes	Comments noted.  Suggested changes have already been made within the 2024 Publication Plan.
Duncan, R & S (Cllrs)	STA24-016-01	Policy SA3	Site Ref No 523: This site, which is next to Cemetery Street, just off the Wolverhampton Road, is right next to the Quarry, which is a regular cause for complaint. Because of the quarry the state of Wolverhampton Road and associated pavement are left in a disgusting condition. Representation is continually being made to Staffordshire County Council, but nothing has improved to any degree whatsoever. In the warmer months, the sand from the quarry is blown into the air and covers much of Cheslyn Hay. If houses were to be built the quarry sand/pollution created would no doubt be a major problem in several respects. It would cover houses, cars and washing to a more extreme extent to the rest of Cheslyn Hay and surrounding areas. It would also exacerbate any respiratory conditions. As most houses will eventually have numerous cars, one per member of the family, this will add yet more issues on an already overloaded local infrastructure. Another very important issues that is being overlooked is with regards to the hoovering up of our now very limited green spaces. Cheslyn Hay is, with all intense and purposes, a concrete jungle.	Yes	No	No	The Council's Rural Services and Facilities Audit (2021) identifies Cheslyn Hay and Great Wyrley as some of the district's most sustainable locations and Tier 1 settlements. Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024. The plan includes strong design (Policy HC10), open space (Policy HC17), education (Policy HC15) and health (Policy HC14) policies to ensure that new development is of high quality and delivers the necessary infrastructure.  Engagement throughout plan preparation has taken place with Local Highways Authority (Staffordshire County Council). They have not indicated that the impact of the proposed allocation would not generate any significant impacts on the transport network or highway safety that cannot be mitigated in line with paragraph 114 d of the NPPF.
Robson, A	RES24-200-01	Policy SA3	Object to allocation: 523, Wolverhampton Road, Cheslyn Hay, for the following reasons:  Poor choice of site due to its location near unsafe, precarious bend on busy Wolverhampton Road Existing quarry site, plus volume of traffic and surrounding congestion areas, accidents happen on motorway and traffic comes into Cheslyn Hay Pedestrian access limited to narrow footpaths Noise and pollution levels already an issue with quarry and heavy vehicles Protect green areas and not erase the small green belt left	Not stated	No	Not stated	The Council's Rural Services and Facilities Audit (2021) identifies Cheslyn Hay and Great Wyrley as some of the district's most sustainable locations and Tier 1 settlements. Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024. The plan includes strong design (Policy HC10), open space (Policy HC17), education (Policy HC15) and health (Policy HC14) policies to ensure that new development is of high quality and delivers the

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			Risking the next generation				necessary infrastructure.  Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies. Engagement throughout plan preparation has taken place with Local Highways Authority, School Organisation Team (SOT) (both Staffordshire County Council), and Staffordshire and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical Commissioning Group). None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities, or addressed through proposed Policies HC14, and HC15.
Evolve Planning & Design for Cameron Homes	AGT24-017-02-19	Policy SA3	Land east of Wolverhampton Road - this is supported as 'sound' by Cameron Homes who have a current interest in this land. Details of the proposed allocation in paragraph 4.4 of the full representation. Cameron Homes considers that the identified yield of 49 dwellings underestimates the likely capacity of the site, having regard to the proposed policies in respect of housing density and mix. The sketch layout attached at Appendix A demonstrates a scheme of approximately 56 dwellings. Land east of Wolverhampton Road - details on Sustainability Appraisal, Green Belt Harm, Landscape Sensitivity, impact on the historic environment, impact on flood risk and highways are detailed in paragraphs 12.6 - 12.13 of the full representation. There is an agreement in place between the landowner and Cameron Homes to facilitate development of the site and therefore the site is deliverable and immediately available.	Yes	Yes	Yes	Comments and support noted.  The yield identified within the site proforma for this proposed allocation is a 'minimum' of 49 dwellings. This is based on the assessment of the site and further details provided through the Housing Site Assessment Topic Paper 2024. As such, it is not considered necessary to increase the yield of the site.
Historic England	STA24-023-01	Policy SA3	Site 523 The HESA references the need to consider the setting of a listed building and for proposed development to be sensitive to its impact on the listed building. There is no reference in the plan in Appendix C under site 523 to any of the mitigation measures identified in the HESA 2022 Report, which we require to be included in the plan.	Not stated	Not stated	Not stated	<b>Minor modification 058: add in "Any historic environment mitigation for the site, as identified in the council's Historic Environment Site Assessment (2022), including any mitigation required as a result of archaeological investigations."</b>
Slater, J	RES24-217-01	Policy SA3	Objection to Wolverhampton Road, Cheslyn Hay. The current density of housing in the area means infrastructure and amenities are already overstretched. The design of the site is on a dangerous bend. Due to heavy traffic subsidence, the road has been inaccessible for 2 way traffic for many months (temp traffic lights). The footpath leading to the development is narrow and dangerous. Children walking to school would be at risk. The site is a natural corridor for wildlife. Bats in the trees, frogs and	Not stated	Not stated	Not stated	Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies. Engagement throughout plan preparation has taken place with Local Highways Authority, School Organisation Team (SOT) (both Staffordshire County Council), and Staffordshire and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical

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			toads, as well as newts for example.				Commissioning Group). None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities, or addressed through proposed Policies HC14, and HC15.  The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact on habitats sites.
Ellis, K	RES24-063-01	Policy SA3	Site 523 Cheslyn Hay already has infrastructure problems in terms of there not having enough Doctors/ Pharmacies/Schools/Libraries etc. There is not enough room/services to support the current population of Cheslyn Hay let alone adding more people.  There needs to be a clear plan for the road as there are currently many issues with Wolverhampton Rd East. There are constant traffic lights restricting the flow of traffic and constant flooding to make the road even more dangerous. The bend in the road is also dangerous.	Yes	No	No	Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies. Engagement throughout plan preparation has taken place with Local Highways Authority, School Organisation Team (SOT) (both Staffordshire County Council), and Staffordshire and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical Commissioning Group). None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities, or addressed through proposed Policies HC14, and HC15.
Grocutt, A	RES24-089-01	Policy SA3	Site 523, Land East of Wolverhampton Road, Cheslyn Hay has the following issues:  Loss of Light and Overlooking: Concerns about shadows on existing homes and privacy invasion. Development Density: Strain on infrastructure and lack of green spaces. High Traffic Congestion: Existing road congestion worsened by additional residents. Harm to Wildlife: Encroachment on natural habitats. Overwhelmed Schools and Healthcare Facilities: Existing services at capacity. Road Conditions: Need for repairs and maintenance. Advocating for responsible urban planning, we propose thorough impact assessments, sustainable design, green spaces, traffic management, and wildlife conservation.	Yes	No	No	The Council's Rural Services and Facilities Audit (2021) identifies Cheslyn Hay and Great Wyrley as some of the district's most sustainable locations and Tier 1 settlements. Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024. The plan includes strong design (Policy HC10), open space (Policy HC17), education (Policy HC15) and health (Policy HC14) policies to ensure that new development is of high quality and delivers the necessary infrastructure.  Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies. Engagement throughout plan preparation has taken place with Local Highways Authority, School Organisation Team (SOT) (both Staffordshire County Council), and Staffordshire

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							and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical Commissioning Group). None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities, or addressed through proposed Policies HC14, and HC15.
<b>Cheslyn Hay: Site 119a – Land adjoining Saredon Road</b>							
Cheslyn Hay Parish Council	STA24-011-01	Policy SA3	Site allocation 119: Land adjoining Saredon Road is unsound. Site allocations in Cheslyn Hay are contrary to policies EC8, HC14, HC15, HC17 and HC19 and a thorough assessment to establish capacity is essential to ensure that the roads, sewers, schools and community facilities can accommodate any additional housing before any further planning permission is granted in both Parishes (Cheslyn Hay and Great Wyrley). Etruria mineral formation should be safeguarded on sites 119a/b in Cheslyn Hay.	Not stated	No	Not stated	The Council's Rural Services and Facilities Audit (2021) identifies Cheslyn Hay and Great Wyrley as some of the district's most sustainable locations and Tier 1 settlements. Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024. The plan includes strong design (Policy HC10), open space (Policy HC17), education (Policy HC15) and health (Policy HC14) policies to ensure that new development is of high quality and delivers the necessary infrastructure.
Staffordshire County Council	STA24-044-03	Policy SA3	In respect to Site 119a, Land adjoining Saredon Road (pg. 176, Appendix C), we have accepted this allocation in previous consultations, the allocation takes into account site layout and the adjoining mineral working. We accept and wish for the key requirement to remain which states, "Site layout and design to be based on an environmental assessment that takes into account permitted mineral operations and avoids additional restrictions being imposed on those operations." We support this requirement noting that the quarry has a permission to win and work clay and import waste until 21 February 2042 (refer to condition 2 of permission SS.EA/11)	Yes	Yes	Yes	Comments noted.
Staffordshire County Council LLFA	STA24-044-19	Policy SA3	Ref 119a - Land adjoining Saredon Road Surface water - significant flow routes.	Not stated	Not stated	Not stated	Comments noted.
Duncan, R & S (Cllrs)	STA24-016-01	Policy SA3	Site Ref. No. 119a: This development is over the road from two of our local schools, which are well populated and are again looking to expand their numbers even further in September 2024. Saredon Road is a very busy road throughout the day, as a main route in and out of Cheslyn Hay. Further building will increase the amount of traffic on this road quite considerably. This will increase noise and air pollution. It will also increase the potential for accidents due to the number and age of the children attending the school. Traffic coming from the motorways use	Yes	No	No	The Council's Rural Services and Facilities Audit (2021) identifies Cheslyn Hay and Great Wyrley as some of the district's most sustainable locations and Tier 1 settlements. Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			Cheslyn Hay as a cut through, including HGV's and articulated lorries. It should also be remembered this development is also eroding the minimal green space still to be found in Cheslyn Hay, which is unacceptable. Incidentally, the proposed Site 523 development also adds weight to this objection for the reasons stated above.				Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies. Engagement throughout plan preparation has taken place with Local Highways Authority, School Organisation Team (SOT) (both Staffordshire County Council), and Staffordshire and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical Commissioning Group). None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities, or addressed through proposed Policies HC14, and HC15.
Berrys for Wilkes, P	AGT24-006-03-02	Policy SA3	The policy is supported insofar as it relates to housing allocation 119a for land adjoining Saredon Road. This allocated site will be encompassed within the development boundary for Cheslyn Hay which is identified as a Tier 1 settlement offering a sustainable location for housing development. The development of this land for housing is viable and deliverable within the plan period and active liaison is currently ongoing to bring the site forwards early in the plan period. Therefore, this housing allocation will be delivered to meet the districts housing target up to 2041.	Yes	Yes	Yes	Comments and support noted.
Advance Land & Planning for Stephens, M	AGT24-002-03-01	Policy SA3	Site 119 and 119a We agree that the land at Saredon Road represents an excellent location for new housing development. The location is immediately opposite Cheslyn Hay Primary School and Cheslyn Hay Academy, and the leisure centre. Confirm that the residual element of Site 119 remains available for development in conjunction with adjoining land 119a (and omission site 119b). Site 119 was scrutinised and endorsed by the Council and Inspector through the SAD and was subsequently removed from the Green Belt. Bringing forward this land has been delayed to await the allocation of the safeguarded land for housing and allow it to be developed comprehensively. We suggest that this residual element of Site 119 should be identified as a housing allocation with Site 119a. Support the proposed housing allocation of Site 119a.	Not stated	Not stated	Not stated	Comments and support for site 119a noted.  Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.  Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.
Advance Land & Planning for Stephens, M	AGT24-002-03-01	Policy SA3	Site 119 and 119a We do not object to the future residential development of the northern part of the proposed housing allocation (currently used as a sawmill/wood yard). However, the owner has submitted several applications and appeals and to date has shown no inclination of wanting to develop the land for housing. We	Not stated	Not stated	Not stated	There is no indication that the landowner of the northern part of the site does not wish to bring the site forward for development. Any representations made by the landowner will be considered in full.



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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			question whether this separate, land-locked property is genuinely available. We suggest it prudent to simply include it within the Development Boundary for Cheslyn Hay, but without notation, so it can come forward as modest windfall.				
Historic England	STA24-023-01	Policy SA3	Site 119a It would be recommended to add in a sentence that relates to the retention of the trees and hedgerow being necessary to conserve the existing historic character.	Not stated	Not stated	Not stated	It is considered that the last bullet point in 'key requirements' on the proforma for this site allocation satisfies the request.  No change proposed.
Berrys for Wilkes, P	AGT24-006-03-02	Appendix C	The policy is supported insofar as it relates to housing allocation 119a for land adjoining Saredon Road. This allocated site will be encompassed within the development boundary for Cheslyn Hay which is identified as a Tier 1 settlement offering a sustainable location for housing development. The development of this land for housing is viable and deliverable within the plan period and active liaison is currently ongoing to bring the site forwards early in the plan period. Therefore, this housing allocation will be delivered to meet the districts housing target up to 2041.	Yes	Yes	Yes	Comments noted.  Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.
<b>Cheslyn Hay: Site 730 – Land at Fishers Farm</b>							
Cheslyn Hay Parish Council	STA24-011-01	Policy SA3	Allocation of site 730 Land at Fishers Farm is unsound. Site allocations in Cheslyn Hay are contrary to policies EC8, HC14, HC15, HC17 and HC19 and a thorough assessment to establish capacity is essential to ensure that the roads, sewers, schools and community facilities can accommodate any additional housing before any further planning permission is granted in both Parishes. Development will see urban sprawl between Great Wyrley and Cheslyn Hay and lead to over development of both villages. Concerns relating to flooding and previous mining use.	Not stated	No	Not stated	The Council's Rural Services and Facilities Audit (2021) identifies Cheslyn Hay and Great Wyrley as some of the district's most sustainable locations and Tier 1 settlements. Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024. The plan includes strong design (Policy HC10), open space (Policy HC17), education (Policy HC15) and health (Policy HC14) policies to ensure that new development is of high quality and delivers the necessary infrastructure.
Staffordshire County Council LLFA	STA24-044-19	Policy SA3	Surface water - minor ponding and upper Landywood Lane is a flowpathway.	Not stated	Not stated	Not stated	Comments noted.
Duncan, R & S (Cllrs)	STA24-016-01	Policy SA3	Site Ref. No. 730: Although this is a smaller proposed development it must be viewed in the same / similar context as each of the developments covered above. The area is much smaller than the other developments but again continues to erode the green areas currently still visible. [Representations for Sites 523, 119a and 136 provide details].	Yes	No	No	The Council's Rural Services and Facilities Audit (2021) identifies Cheslyn Hay and Great Wyrley as some of the district's most sustainable locations and Tier 1 settlements. Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies. Engagement throughout plan preparation has taken place with Local Highways Authority, School Organisation Team (SOT) (both Staffordshire County Council), and Staffordshire and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical Commissioning Group). None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities, or addressed through proposed Policies HC14, and HC15.
Advance Land and Planning Ltd for BSA Environmental Ltd	AGT24-002-01-01	Policy SA3	Support allocation of site 730 Land at former Fishers Farm Garden Centre. Feasibility layout for 10 dwellings confirmed that there are no overriding constraints to prevent the early development of this site, which is in an accessible location and represents sustainable development opportunity for a small house-builder.	Not stated	Not stated	Not stated	Comments and support noted.
<b>Cheslyn Hay: Omission sites</b>							
Advance Land & Planning for Stephens, M	AGT24-002-03-01	Policy SA3	Site 119b (omission site) Strongly maintain that there is compelling policy-based evidence to support the deletion of Site 119b from the Green Belt and its allocation for housing (circa 40-50 dwellings), with a green/open space buffer around the northern edges. Site 119b represents one of the less constrained site options and should have been allocated to fulfil the spatial development strategy. The Illustrative Development Concept Plan (attached) demonstrates how Site 119b, with Site 119a could be comprehensively developed for housing. Site 119b is assessed as having a rating of low/moderate harm to the Green Belt and the majority of its ratings against the five green belt purposes are assessed as weak/no contribution. The parcel has low landscape sensitivity. It is in flood zone 1, holds no known biodiversity or heritage value and would not compromise the continued working of the claypit. When considered against alternative sites and locations, there are compelling policy and practical reasons for removing this land from the Green Belt. Initial concerns regarding the highways junction were not based upon a detailed technical assessment of the additional impact and represented an informal opinion from the County Council.	Not stated	Not stated	Not stated	Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.  Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.
Evolve Planning & Design for Bloor Homes	AGT24-017-01-18	Policy SA3	Land at Royal's Farm, Cannock The site description can be found in paragraphs 4.2 – 4.9 of the full representation – several agricultural field enclosures,	Not stated	Not stated	Not stated	Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			currently in arable use, partial tree and hedgerow cover/boundaries, public right of ways across the site. Delivery of approximately 550 new homes, significant green infrastructure including village greens, playing fields, community orchard, allotments and equipped play. Full details of the Sustainability Appraisal findings, Sequential Test, Green Belt Harm, Landscape Sensitivity, impact on the Historic Environment, Surface Water Flooding and Highways can be found in paragraphs 4.10 – 4.30 of the full representation. There is an agreement in place between the landowner and Bloor Homes to facilitate the development of the site. Information gathered to date concludes there are no physical or other constraints likely to render the site undeliverable within the proposed plan period. The site is deliverable and immediately available. Bloor Homes is promoting Land at Royal's Farm, Cannock for residential development. This site is suitable, available and achievable and should be considered if it is determined through the EiP that omission sites are necessary to make the Local Plan sound. A site location plan is included at Appendix 1 and Development Framework Plan is included at Appendix 2.				Site Assessment Topic Paper 2024.  Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.
<b>Great Wyrley: Site 141 – 154a Walsall Road</b>							
Staffordshire County Council LLFA	STA24-044-19	Policy SA3	Ref 141 - 154a Walsall Road Surface water - Walsall Road is a significant surface water flow pathway. There is also a significant surface water flow pathway to the Northeast of the proposed development site. Flooding hotspots - One record of internal property flooding in proximity of the proposed site.	Not stated	Not stated	Not stated	Comments noted.
<b>Great Wyrley: Site 136 – Land at Landywood Lane</b>							
Cheslyn Hay Parish Council	STA24-011-01	Policy SA3	Allocation of site 136 Land at Landywood Lane is unsound. Site allocations in Cheslyn Hay are contrary to policies EC8, HC14, HC15, HC17 and HC19 and a thorough assessment to establish capacity is essential to ensure that the roads, sewers, schools and community facilities can accommodate any additional housing before any further planning permission is granted in both Parishes. Development will see urban sprawl between Great Wyrley and Cheslyn Hay and lead to over development of both villages. Concerns relating to flooding and previous mining use.	Not stated	No	Not stated	The Council's Rural Services and Facilities Audit (2021) identifies Cheslyn Hay and Great Wyrley as some of the district's most sustainable locations and Tier 1 settlements. Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024. The plan includes strong design (Policy HC10), open space (Policy HC17), education (Policy HC15) and health (Policy HC14) policies to ensure that new development is of high quality and delivers the necessary infrastructure.
Staffordshire County Council LLFA	STA24-044-19	Policy SA3	Ref 136 - Land at Landywood Lane Surface water - surface water flow pathway indicated. Flooding hotspots - one historic record to the north of the proposed site.	Not stated	Not stated	Not stated	Comments noted.

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
Duncan, R & S (Cllrs)	STA24-016-01	Policy SA3	Site Ref. No. 136: This development, that has already begun in Phase 1 was previously objected to and supported by Sir Gavin Williamson MP; is a development the local population was and are still up in arms about. The first tranche began and was approved before we became Councillors. For many of the reasons outlined above this development should never have been allowed. It has already increased the level of additional traffic on our verifiably, poor road system. It has again destroyed the limited green areas we once had. The second phase for the development of Site Ref. 136 is a travesty. The additional houses will intensify the pressure yet further to a deplorable level on our overburdened infrastructure, and road network. Bringing yet more cars, air pollution, overburdened our schools & GP practices to a greater degree, to a deplorable level. Eating up yet more of our ever-decreasing green space and the removal of yet more trees to satisfy an unquenchable desire to systematically destroy the need for more housing without really considering the effect.	Yes	No	No	Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies. Engagement throughout plan preparation has taken place with Local Highways Authority, School Organisation Team (SOT) (both Staffordshire County Council), and Staffordshire and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical Commissioning Group). None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities, or addressed through proposed Policies HC14, and HC15.
Evolve Planning & Design for Cameron Homes	AGT24-017-02-03	Policy SA3	<p>Land at Landywood Lane - this is supported as 'sound' by Cameron Homes who have a current interest in this land. It appears unnecessary to include the existing SAD allocation within the proposed allocation as the majority of the site is almost complete. This seems inconsistent with the approach taken on other sites within the Plan. Details of the proposed allocation in paragraph 4.5 of the full representation.</p> <p>Cameron Homes considers that the identified yield of 159 dwellings underestimates the likely capacity of the site, having regard to the proposed policies in respect of housing density and mix. The sketch layout attached at Appendix A demonstrates a scheme of approximately 177 dwellings.</p> <p>Land at Landywood Lane - details on Sustainability Appraisal, Green Belt Harm, Landscape Sensitivity, impact on the historic environment, impact on flood risk, highways, impact on current land use, impact on natural environment and impact on environmental quality are detailed in paragraphs 12.7 - 12.25 of the full representation. There is an agreement in place between the landowner and Cameron Homes to facilitate development of the site and therefore the site is deliverable and immediately available.</p>	Yes	Yes	Yes	<p>Comments and support noted.</p> <p>The base date for the Local Plan is April 2023. The consistent approach taken was to allocate existing permissions where consented homes had not started construction, and our monitoring confirmed that there will still 6 homes still to start construction at this base date.</p> <p>The yield identified within the site proforma for this proposed allocation is a 'minimum' of 159 dwellings. This is based on the assessment of the site and further details provided through the Housing Site Assessment Topic Paper 2024. As such, it is not considered necessary to increase the yield of the site.</p>
Historic England	STA24-023-01	Policy SA3	<p>Site 136</p> <p>We would request that there is inclusion of the need for potential archaeological investigation on the site to understand the significance of finds and understand how development may come forward. We welcome an enhancement opportunity with the mining display boards and would request the inclusion of the term 'interpretation' boards.</p>	Not stated	Not stated	Not stated	<p>The proforma for this site allocation states that mitigation will be required resulting from any archaeological investigations.</p> <p>No changes required.</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
<b>Great Wyrley: Site 139 – Pool View, Churchbridge</b>							
Staffordshire County Council LLFA	STA24-044-19	Policy SA3	Ref 139 - Poolview, Churchbridge Flood Zone 2 and FZ3 to the North. Surface water - extensive, significant flow pathway bisecting site. Flooding hotspots - cluster of records of property flooding to the immediate southern vicinity.	Not stated	Not stated	Not stated	Comments noted.
Advance Land & Planning for Seabridge Developments	AGT24-002-02-01	Policy SA3	Site 139 - Pool View Site 139 was scrutinised and endorsed by the Council and the Inspector through the SAD and was subsequently removed from the Green Belt and allocated for housing. Circumstances have not changed since the allocation and it therefore remains wholly appropriate that the allocation should be retained and carried forward in the emerging Local Plan. We fully support and endorse its continued allocation which will be delivered in the early part of the plan period.	Not stated	Not stated	Not stated	Comments and support noted.
<b>Great Wyrley: Site 638: Loades Plc</b>							
Staffordshire County Council LLFA	STA24-044-19	Policy SA3	Ref 638 - Loades Plc Surface water - Gorse Lane is a flow pathway.	Not stated	Not stated	Not stated	Comments noted.
<b>Great Wyrley: Site 704: Land off Norton Lane</b>							
<b>Great Wyrley: Site 536a – Land off Holly Lane</b>							
Historic England	STA24-023-01	Policy SA3	Agree that trees and hedgerows should be retained, though would not consider this as an enhancement measure but rather a required mitigation measure to protect the setting of heritage assets and historic character. Additional planting would be considered as an enhancement measure and we support this inclusion in the site proforma. We request that it is added that the measures are to conserve the setting of heritage assets and historic character so that the information is readily available at planning applications stage.	Not stated	Not stated	Not stated	The relevant section of the site proforma states that the retention of hedgerows and trees is considered mitigation rather than enhancement. Additional planting in relation to the proposed site would be subject to and delivered in line with the relevant development plan policies.  <b>Minor modification 060:</b>  "Any historic environment mitigation for the site to conserve the setting of heritage assets and historic character as identified in the council's Historic Environment Site Assessment (2022)."
Pegasus Group for Miller Homes	AGT24-031-03-14	Policy SA3	Miller Homes fully support the allocation 'Land off Holly Lane' (ref 536a) and can confirm that it is suitable and deliverable. The Illustrative Masterplan (figure 2.2) shows how this part of the landholding can achieve the requirement of the allocation including new homes, specialist units for older people, drop-off parking for Landywood Primary School, open space, landscaping and access. The site allows for around 72 standard residential	Not stated	No	No	Comments and support noted.  Third bullet already makes it clear that archaeological mitigation is only needed if investigations show that this is required.  It is not considered necessary to delete the



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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			dwelling based on 35dph, and specialist housing element comprises 40 units. Miller Homes appointed highways consultant, Sweco, to progress detailed proposals for the access arrangements off Holly Lane and the drop-off parking area. Two minor amendments proposed to the site proforma for Holly Lane as detailed in paragraphs 3.12-3.14 of the representation.				fourth bullet point within the proforma as this is site-specific and will not be covered in this detail elsewhere in the Local Plan.
<b>Great Wyrley: Omission sites</b>							
Pegasus Group for Miller Homes	AGT24-031-03-14	Policy SA3	Miller Homes are promoting 23ha of land for developed, located to the south of Holly Lane, Great Wyrley. Great Wyrley is a highly sustainable Tier 1 settlement which is a suitable location for growth. The entire landholding is available, suitable, and deliverable and would form a logical and sensitive extension to the Tier 1 settlement. If during examination it becomes clear that the Council need to increase their housing requirement, we ask that consideration be given to the following options – <ul style="list-style-type: none"> <li>Extending the boundary of Site 536a by taking in land to the west that is within the landholding; or,</li> <li>Extending the boundary of Site 536a by taking in land to the west and south that is within the landholding.</li> </ul> Figure 2.3 shows the masterplan should the land to the west of 536a be included in the allocation, and this would provide an additional 22 standard residential dwellings. Figure 2.4 shows the masterplan should the land to the west and south be included in the allocation. This site could provide a larger specialist facility for older people and has the potential to deliver recreation uses with its own access and parking. Details on the Green Belt harm if this section of the site is allocated can be found in paragraphs 2.16 – 2.4 of the full representation.	Not stated	No	No	Comments and site representation noted.  Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.  Justification for the council’s spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district’s growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan’s ability to deliver housing growth.
<b>Penkridge: Site 005 – Land at Cherry Brook</b>							
Burrows, A & D	RES24-031-01	Policy SA3	Sewage drain located within field. Close to widened M6, creates air and noise issues for new residents, measuring at Wolgarston Bridge ceased over 2 years ago. Significant access issues, existing access unsuitable and dangerous. Negative impact on existing wildlife.	Not stated	Not stated	Not stated	Comments noted.  Specific details regarding the access and egress to the site will be assessed further during any forthcoming planning application. The relevant consultees will be asked to provide comments on the scheme.  The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to identify – amongst other things – allocations which may have a ‘likely significant effect’ on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact on habitats sites.
Forman, C	RES24-072-01	Policy SA3	Oppose allocation. Close proximity of motorway will impact on air and noise pollution. Inadequate access for increase in	Not stated	Not stated	Not stated	Comments noted.

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			number of vehicles. Negative impact on local air pollution and local habitats including bat roosts. Poor access for construction traffic will create a dangerous situation.				<p>The impact upon air quality from development on designated sites has been considered by partner authorities that has incorporated assessments of the predicted growth in vehicular movements across all site allocations. This includes cumulative impacts. Furthermore, there is only one Air Quality Management Area (AQMA) in the district which is located along the A5 between M6 J12 and Cannock (AQMA No.5 Oak Farm) where there are no allocations proposed.</p> <p>Engagement throughout plan preparation has taken place with Local Highways Authority (Staffordshire County Council). They have not indicated that the impact of the proposed allocation would not generate any significant impacts on the transport network or highway safety that cannot be mitigated in line with paragraph 114 d of the NPPF.</p>
Luffman, J	RES24-138-01	Policy SA3	<p>We the residents of Cherry Brook estate find this section of the Local Plan unsound.</p> <p>Deterioration of Estate roads will occur due to the access and egress of construction machinery and heavy vehicles.</p> <p>Duty of care to residents due to the closeness of M6 with associated noise (above 65 db) and pollution. 117,000 vehicles per day equates to 40.9 million p.a and rising.</p> <p>Original plan was for 63 dwellings this should be reduced to 48 dwellings taking into account all constraints.</p> <p>The M6 will at some time be widened.</p> <p>Access by Severn Trent Water Board to maintain sewage pipes.</p> <p>Possible contamination of ground by Anthrax.</p> <p>The area is surrounded by Green Belt land.</p> <p>Bats and other protected wildlife present on land.</p>	Not stated	Not stated	Not stated	<p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>Engagement throughout plan preparation has taken place with Local Highways Authority (Staffordshire County Council). They have not indicated that the impact of the proposed allocation would not generate any significant impacts on the transport network or highway safety that cannot be mitigated in line with paragraph 114 d of the NPPF.</p> <p>The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact on habitats sites.</p>
Penkridge Parish Council	STA24-036-01	Policy SA3	005 Cherrybrook is contentious with concerns regarding access, flooding and overdevelopment in view of its close proximity to the M6.	Not stated	Not stated	Not stated	Specific details regarding the access and egress to the site will be assessed further during any forthcoming planning application. The relevant consultees will be asked to provide comments on the scheme.
Staffordshire County Council	STA24-044-19	Policy SA3	Ref 005 - Land at Cherrybrook Surface water - minor flow pathway.	Not stated	Not stated	Not stated	Comments noted.

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
LLFA							
Parrott, S	6425	Policy SA3	This plan is unsound because of poor access and would create a rat run through a residential area. Unsound because of lack of school places causing extra air pollution. This land has a main sewer which cannot be built on. Not a duty of care to residents and is unsound due to access air pollution off the motorway.	No	No	No	<p>Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies. Engagement throughout plan preparation has taken place with Local Highways Authority, School Organisation Team (SOT) (both Staffordshire County Council), and Staffordshire and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical Commissioning Group). None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities, or addressed through proposed Policies HC14, and HC15.</p> <p>The impact upon air quality from development on designated sites has been considered by partner authorities that has incorporated assessments of the predicted growth in vehicular movements across all site allocations. This includes cumulative impacts. Furthermore, there is only one Air Quality Management Area (AQMA) in the district which is located along the A5 between M6 J12 and Cannock (AQMA No.5 Oak Farm) where there are no allocations proposed.</p>
Taylor, J	RES24-233-01	Policy SA3	Unsound for the following reasons. South Staffordshire has a duty of care for its residents and possible future residents. The site will not offer the duty of care because of the proximity of the M6 Motorway and the noise and pollution above 65db and air pollution causing both mental and physical illnesses. The M6 now has close on 117000 lorries, vans, coaches and cars travel this road each and every day which equates to 40.9 million vehicles passing each year. 1996 planning inspector stated the site be considered for 63 houses. Later he commented that if the M6 was widened further this number would be reduced. In effect an increase of 25% in motorway results in a 25% reduction in houses equals 45 dwellings. Access and egress to Cherrybrook currently 500 vehicles adding another 200 cars for 81 houses. STWA also pump out sewage on this land which reduces the land further. Bats are also living/nesting in this area. Cherrybrook is also just 3 miles from Cannock Chase an area of ANOB and a SAC site. An area afforded significant protection. Potential social hsg 30% of 81 houses = 24 houses, giving people no option of living there.	No	No	No	<p>Comments noted.</p> <p>Engagement throughout plan preparation has taken place with Local Highways Authority (Staffordshire County Council). They have not indicated that the impact of the proposed allocation would not generate any significant impacts on the transport network or highway safety that cannot be mitigated in line with paragraph 114 d of the NPPF.</p> <p>Policy HC11 will ensure that noise and air pollution are considered through the planning application process and mitigated, where required.</p> <p>The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon</p>

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							their impact on habitats sites.
Fisher, M	RES24-069-01	Policy SA3	<p>This site will not offer the duty of care due to the proximity of the M6 The noise and air pollution will be excessive. When the land was moved to "safeguarding" the motorway was nowhere as busy as it is today. It is estimated that 117000 vehicles travel this road on a daily basis, which equates to approximately 40.9 million vehicles a year. The District Council must have a duty of care in the community to protect the residents against:</p> <p>Noise pollution, Air pollution Mental Illness and physical illness. In 1996 the planning inspector stated that the site could be considered for 63 houses. Later is was stated that if the M6 was widened further then this number would need to be reduced further to ensure a distance barrier between housing and the M6.</p> <p>The Motorway has been widened by an increase of 25% which should result in 25% reduction in houses, i.e. 45 dwellings. As a resident of Cherrybrook Estate I find the Local Plan including the site at the rear of our estate to be an unsound decision.</p> <p>The land at the rear of Cherrybrook is bordered to the East by the M6 and then green belt upto the Chase. The land is bordered to the North by Canal and Riverside Heritage. Alongside the canal is a service strip of land which is used by STWA for sewage pump out. This further reduces the amount of land available to build on.</p> <p>The land gets very waterlogged as proved the last time when the contractors had to have their vehicles towed out of the field due to them sinking into the mud.</p> <p>Access to and from the proposed site is very poor. It was noted on the previous application that the roads were not wide enough to cope with construction or indeed emergency vehicles should they be needed. Due to the traffic on the Cannock Road at peak times exit and entry onto Cherrybrook can be a laborious chore, made worse by school crossing patrols sited by the Boat Inn and the top of Wolgarston Way. If another 82 houses are added to the estate this will only make the matter worse.</p> <p>I believe that there will be social housing on this proposed site. This will give the people allocated these houses no choice in whether they wish to live next to a motorway, given the associated risks.</p>	No	No	No	<p>Comments noted.</p> <p>Engagement throughout plan preparation has taken place with Local Highways Authority (Staffordshire County Council). They have not indicated that the impact of the proposed allocation would not generate any significant impacts on the transport network or highway safety that cannot be mitigated in line with paragraph 114 d of the NPPF. Specific details regarding the access and egress to the site will be assessed further during any forthcoming planning application. The relevant consultees will be asked to provide comments on the scheme.</p> <p>Policy HC11 will ensure that noise and air pollution are considered through the planning application process and mitigated, where required.</p> <p>The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact on habitats sites.</p> <p>All proposed allocations have been screened by the council against fluvial flood zones to determine unsuitable sites within flood zone 3. Remaining sites have been assessed by the Lead Local Flood Authority (LLFA) to determine sites which presented unmitigable flood risk(s). A level 2 Strategic Flood Risk Assessment (SFRA) was also commissioned to address Environment Agency concerns pertaining to 8 sites, which site 005 was not one. This process is set out in more detail in the Strategic Flood Risk Assessment and Sequential Test Topic Paper 2024.</p>
Edge, R	RES24-061-01	Policy SA3	<p>Site 005 Access to land is too narrow Previous planning application rejection on grounds of access constraints Access only possible for very minor development if at all Present designation is unsound</p>	No	No	No	<p>Engagement throughout plan preparation has taken place with Local Highways Authority (Staffordshire County Council). They have not indicated that the impact of the proposed allocation would not generate any significant impacts on the transport network or highway</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			Noise pollution - requires noise survey including a traffic flow survey of the M6				<p>safety that cannot be mitigated in line with paragraph 114 d of the NPPF.</p> <p>Specific details regarding the access and egress to the site will be assessed further during any forthcoming planning application. The relevant consultees will be asked to provide comments on the scheme.</p> <p>Policy HC11 will ensure that noise and air pollution are considered through the planning application process and mitigated, where required.</p>
Cooper, J	RES24-045-01	Policy SA3	<p>Land off Cherrybrook (site ref 005) is unsound and should be removed from the local plan.</p> <p>Traffic and suggested entrance/exit to the proposed development is of immense concern - questionable safety.</p> <p>Devastation to the wildlife.</p> <p>Duty of care for local residents.</p>	No	No	No	<p>Engagement throughout plan preparation has taken place with Local Highways Authority (Staffordshire County Council). They have not indicated that the impact of the proposed allocation would not generate any significant impacts on the transport network or highway safety that cannot be mitigated in line with paragraph 114 d of the NPPF.</p> <p>Specific details regarding the access and egress to the site will be assessed further during any forthcoming planning application. The relevant consultees will be asked to provide comments on the scheme.</p> <p>The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact on habitats sites.</p>
Dawes, W & C	RES24-054-01	Policy SA3	<p>Plan unsound.</p> <p>Previous planning permission in 2019 withdrawn - reasons remain, not viable.</p> <p>No through access - any access roads to the site too narrow for the volume of traffic- potential accidents.</p> <p>Not sufficient infrastructure to accommodate needs of the community.</p>	Not stated	No	Not stated	<p>Specific details regarding the access and egress to the site will be assessed further during any forthcoming planning application. The relevant consultees will be asked to provide comments on the scheme.</p> <p>Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies. Engagement throughout plan preparation has taken place with Local Highways Authority, School Organisation Team (SOT) (both Staffordshire County Council), and Staffordshire and Stoke on Trent Integrated Care Board</p>



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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							(formerly Stafford and Surrounds Clinical Commissioning Group). None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities, or addressed through proposed Policies HC14, and HC15.
Fleetwood, B	RES24-071-01	Policy SA3	Plan unsound since the last application to build homes the motorway has been expanded to 8 lanes. Field is prone to flooding. Access via Cherrybrook is very narrow and traffic will be increased immensely	Not stated	No	Not stated	All proposed allocations have been screened by the council against fluvial flood zones to determine unsuitable sites within flood zone 3. Remaining sites have been assessed by the Lead Local Flood Authority (LLFA) to determine sites which presented unmitigable flood risk(s). A level 2 Strategic Flood Risk Assessment (SFRA) was also commissioned to address Environment Agency concerns pertaining to 8 sites, which site 005 was not one. This process is set out in more detail in the Strategic Flood Risk Assessment and Sequential Test Topic Paper 2024.  Engagement throughout plan preparation has taken place with Local Highways Authority (Staffordshire County Council). They have not indicated that the impact of the proposed allocation would not generate any significant impacts on the transport network or highway safety that cannot be mitigated in line with paragraph 114 d of the NPPF.
Ash, N	RES24-005-01	Policy SA3	Objects to site allocation 005 - Land at Cherrybrook, pages 194 and 195 of the Plan. The allocation of this site is unsound. Noise levels increase due to the M6, due to widening the motorway. Air pollution likely increased due to this too. Concern about access via Cherrybrook Drive, and through another cul-de-sac. These cul-de-sacs adjoin Cherrybrook Drive at a tangent point to a semicircular loop, which is not ideal. Cherrybrook Drive then leads onto the Cannock Road not far from a mini roundabout where Wolgarston Way meets the Cannock Road. Anyone with knowledge of this junction will be aware how busy it already gets, especially at commuter and school times. Considered unsound due to health and safety.	Yes	No	Yes	Engagement throughout plan preparation has taken place with Local Highways Authority (Staffordshire County Council). They have not indicated that the impact of the proposed allocation would not generate any significant impacts on the transport network or highway safety that cannot be mitigated in line with paragraph 114 d of the NPPF.  Specific details regarding the access and egress to the site will be assessed further during any forthcoming planning application. The relevant consultees will be asked to provide comments on the scheme.  Policy HC11 will ensure that noise and air pollution are considered through the planning application process and mitigated, where required.

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
Winstanley, E	RES24-257-01	Policy SA3	<p>Object to the allocation of 005 - Cherrybrook.</p> <p>M6 now busier due to the additional lane, resulting in air and noise pollution, causing physical and mental health impacts on local residents.</p> <p>Land bordered by the canal and riverside, where there is a variety of wildlife, including bats.</p> <p>Concerns about the access through Cherrybrook and the safety implications.</p> <p>In 1996 the planning inspector stated that the site be considered for 63 houses, but then added that should the M6 be widened then the number of dwellings should be reduced to ensure a safe distance barrier between the houses and the M6. Meaning with the M6 being widened by 25% a 25% reduction of dwellings should be implemented to coincide.</p>	No	No	No	<p>The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact on habitats sites.</p> <p>Engagement throughout plan preparation has taken place with Local Highways Authority (Staffordshire County Council). They have not indicated that the impact of the proposed allocation would not generate any significant impacts on the transport network or highway safety that cannot be mitigated in line with paragraph 114 d of the NPPF.</p> <p>Specific details regarding the access and egress to the site will be assessed further during any forthcoming planning application. The relevant consultees will be asked to provide comments on the scheme.</p> <p>Policy HC11 will ensure that noise and air pollution are considered through the planning application process and mitigated, where required.</p>
Owen, I	RES24-163-01	Policy SA3	<p>Object to allocation 005 - Cherrybrook.</p> <p>Proposed entry road too narrow for emergency service vehicles if cars are parked.</p> <p>Noise and air pollution from the motorway.</p> <p>Duty of care to residents of Cherrybrook, due to further increase of noise and pollution.</p> <p>Village does not have enough services to cope with influx of new dwellings.</p> <p>Biodiversity could be harmed, including: wildlife, wildflowers, water vole, kingfishers, bats, owls, mice, vole, birds of prey.</p>	No	No	No	<p>Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies. Engagement throughout plan preparation has taken place with Local Highways Authority, School Organisation Team (SOT) (both Staffordshire County Council), and Staffordshire and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical Commissioning Group). None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities, or addressed through proposed Policies HC14, and HC15.</p> <p>The impact upon air quality from development on designated sites has been considered by partner authorities that has incorporated assessments of the predicted growth in vehicular movements across all site allocations. This includes cumulative impacts. Furthermore, there is only one Air Quality Management Area (AQMA) in the</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							<p>district which is located along the A5 between M6 J12 and Cannock (AQMA No.5 Oak Farm) where there are no allocations proposed.</p> <p>The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact on habitats sites.</p>
Barlow, J	RES24-007-01	Policy SA3	Site 005 – Unsound due to environmental and safety issues regarding access for existing residents and new dwellings, air and sound pollution, the proximity of the 4 lane M6. Existing restricted access onto Cherrybrook and proposed site is concern for residents and maintenance by Severn Trent. Vehicular traffic will increase and add cars onto narrow roads. Previous planning applications were refused as it was unviable.	Yes	No	Not stated	<p>The impact upon air quality from development on designated sites has been considered by partner authorities that has incorporated assessments of the predicted growth in vehicular movements across all site allocations. This includes cumulative impacts. Furthermore, there is only one Air Quality Management Area (AQMA) in the district which is located along the A5 between M6 J12 and Cannock (AQMA No.5 Oak Farm) where there are no allocations proposed.</p> <p>Engagement throughout plan preparation has taken place with Local Highways Authority (Staffordshire County Council). They have not indicated that the impact of the proposed allocation would not generate any significant impacts on the transport network or highway safety that cannot be mitigated in line with paragraph 114 d of the NPPF.</p> <p>Specific details regarding the access and egress to the site will be assessed further during any forthcoming planning application. The relevant consultees will be asked to provide comments on the scheme.</p>
Beddows, L	RES24-012-01	Policy SA3	Site 005. Penkridge is already overcrowded and is meant to be a village. Extra traffic, doctors unavailable, schools and amenities cannot cope. Areas elsewhere are more appropriate to cope with an influx of people. Plenty of homes available at Penkridge and surrounding areas already.	No	No	No	<p>Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies. Engagement throughout plan preparation has taken place with Local Highways Authority, School Organisation Team (SOT) (both Staffordshire County Council), and Staffordshire and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical Commissioning Group). None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							infrastructure responsibilities, or addressed through proposed Policies HC14, and HC15.
Tomkins, S	RES24-238-01	Policy SA3	<p>Objects to the use of site 005 at Penkridge. Land is too close to M6. It is a natural marsh wildlife habitat. Site has previously been turned down due to access, as roads were deemed too narrow for emergency vehicles. The cul-de-sac widths have not changed, so would still be unacceptable. Majority of Councillors voted against it last time, with 1 against and 1 abstention. Land would be unhealthy environment, due to being close to the ever increasing flow of M6 traffic.</p>	No	No	No	<p>The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact on habitats sites.</p> <p>Engagement throughout plan preparation has taken place with Local Highways Authority (Staffordshire County Council). They have not indicated that [access to the site is problematic or unmitigable] the impact of the proposed allocation would not generate any significant impacts on the transport network or highway safety that cannot be mitigated in line with paragraph 114 d of the NPPF.</p> <p>Specific details regarding the access and egress to the site will be assessed further during any forthcoming planning application. The relevant consultees will be asked to provide comments on the scheme.</p>
Winstanley, E	RES24-257-01	Policy SA3	<p>Objects to site allocation 005.</p> <p>This element of the plan is unsound.</p> <p>The M6 motorway is considerably busier since this land was removed from the Green Belt and safeguarded, as the motorway has been extended to 4 lanes. Junctions 13-15 are one of the busiest sections of the road. The air and noise pollution has a huge physical and mental health impact for existing residents. The Council have a duty of care to their local residents.</p> <p>The land is bordered to the north by the canal and riverside heritage, where a variety of wildlife inhabit, including bats. Developing on this site will have a huge impact on their habitat.</p> <p>Access to Cherrybrook currently sees 500 vehicles passing through, adding 200 cars for 81 houses sounds dangerous and unsound. The suggested entrance/exist to the proposed development is of concern.</p>	No	No	No	<p>The impact upon air quality from development on designated sites has been considered by partner authorities that has incorporated assessments of the predicted growth in vehicular movements across all site allocations. This includes cumulative impacts. Furthermore, there is only one Air Quality Management Area (AQMA) in the district which is located along the A5 between M6 J12 and Cannock (AQMA No.5 Oak Farm) where there are no allocations proposed.</p> <p>The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact on habitats sites.</p> <p>Engagement throughout plan preparation has taken place with Local Highways Authority (Staffordshire County Council). They have not indicated that [access to the site is problematic</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							or unmitigable] the impact of the proposed allocation would not generate any significant impacts on the transport network or highway safety that cannot be mitigated in line with paragraph 114 d of the NPPF.
Pegasus Group for Persimmon Homes	AGT24-032-04-01	Policy SA3	A vision document for 'Land at Cherrybrook Drive' is contained within Appendix 1. Details regarding Penkridge and its services can be found in paragraphs 5.3 – 5.7 of the full representation. The Cherrybrook Drive site is capable of early development in the first five years of the plan and will complement the larger, strategic scale allocations within the plan. The following information can be found in the full representation - history of the site (paragraphs 5.10 – 5.14), sustainable connectivity (paragraphs 5.15 – 5.20), technical assessment (paragraphs 5.21 – 5.22), landscape and visual impact (paragraphs 5.23 – 5.24), traffic and transport (paragraphs 5.25 – 5.27), heritage matters (paragraph 5.28), ecology and biodiversity (paragraph 5.29), flood risk and drainage (paragraph 5.30 – 5.31), noise (paragraph 5.32), air quality (paragraph 5.33).	Not stated	No	Not stated	Comments and support noted.
National Highways	STA24-032-01	Policy SA3	Land at Cherry Brook - potential boundary impacts (landscape, air, noise, drainage, etc.) on the M6.	Not stated	Not stated	Not stated	Comments noted.
Barlow, T	RES24-008-01	Policy SA3	<p>Site Ref 005 – Land of Cherrybrook Drive.</p> <p>The plan to be unsound for the following reasons. SSDC has a duty of care to new residents of the 88 new dwellings proposed in respect of air and sound pollution, due to the increase of millions of cars per year and the proximity of expanded M6 4 lane motorway. Existing air monitoring station nearby is now not used. Concerned about the safety of existing residents due to the limited access from the junction of Cherrybrook drive and the Cannock Road.</p> <p>Site 005 should be removed from the plan.</p>	Yes	No	Yes	<p>The impact upon air quality from development on designated sites has been considered by partner authorities that has incorporated assessments of the predicted growth in vehicular movements across all site allocations. This includes cumulative impacts. Furthermore, there is only one Air Quality Management Area (AQMA) in the district which is located along the A5 between M6 J12 and Cannock (AQMA No.5 Oak Farm) where there are no allocations proposed.</p> <p>Engagement throughout plan preparation has taken place with Local Highways Authority (Staffordshire County Council). They have not indicated that [access to the site is problematic or unmitigable] the impact of the proposed allocation would not generate any significant impacts on the transport network or highway safety that cannot be mitigated in line with paragraph 114 d of the NPPF.</p> <p>Specific details regarding the access and egress to the site will be assessed further during any forthcoming planning application. The relevant consultees will be asked to provide comments on the scheme.</p>



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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
White, L	RES24-251-01	Policy SA3	Site 005 Increased traffic in the area on such a small road would be very dangerous Hazardous for driveways Pollution from M6 would be a big issue	No	Yes	No	<p>The impact upon air quality from development on designated sites has been considered by partner authorities that has incorporated assessments of the predicted growth in vehicular movements across all site allocations. This includes cumulative impacts. Furthermore, there is only one Air Quality Management Area (AQMA) in the district which is located along the A5 between M6 J12 and Cannock (AQMA No.5 Oak Farm) where there are no allocations proposed.</p> <p>Engagement throughout plan preparation has taken place with Local Highways Authority (Staffordshire County Council). They have not indicated that [access to the site is problematic or unmitigable] the impact of the proposed allocation would not generate any significant impacts on the transport network or highway safety that cannot be mitigated in line with paragraph 114 d of the NPPF.</p> <p>Specific details regarding the access and egress to the site will be assessed further during any forthcoming planning application. The relevant consultees will be asked to provide comments on the scheme.</p>
Seward, I & J	RES24-207-01	Policy SA3	The Local Plan is unsound regarding land 005, safeguarded in 1966. However, 1966 is 58 years ago and Penkrige is now very different. Penkrige north represents a fundamental planning change warranting a reassessment of 005. Substituting an equivalent land area in north Penkrige would not have the documented issues connected with 005 and therefore could accommodate a larger number of houses. Site 005 could be returned to Green Belt providing a valuable buffer zone to the M6 and maintaining a green space between Penkrige and Penkrige north conurbations.	Not stated	Not stated	Not stated	Comments noted.
Owen, M	RES24-164-01	Policy SA3	Site 005, land at Cherrybrook, Penkrige Would increase already high levels of air pollution from motorway Mental health issues from insufficient services in the village Any other development on Cherrybrook would choke narrow roads and make emergency vehicle access difficult	No	No	No	<p>The impact upon air quality from development on designated sites has been considered by partner authorities that has incorporated assessments of the predicted growth in vehicular movements across all site allocations. This includes cumulative impacts. Furthermore, there is only one Air Quality Management Area (AQMA) in the district which is located along the A5 between M6 J12 and Cannock (AQMA No.5 Oak Farm) where there are no allocations proposed.</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies. Engagement throughout plan preparation has taken place with Local Highways Authority, School Organisation Team (SOT) (both Staffordshire County Council), and Staffordshire and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical Commissioning Group). None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities, or addressed through proposed Policies HC14, and HC15.
Adams, A	RES24-001-01	Policy SA3	Site 005 - South Staffordshire council have a "duty of care" which it affords to its community. To allow this development will be an abdication of this duty. It will place future residents in danger of numerous hazards from fumes, noise and pollution	Not stated	No	Yes	The impact upon air quality from development on designated sites has been considered by partner authorities that has incorporated assessments of the predicted growth in vehicular movements across all site allocations. This includes cumulative impacts. Furthermore, there is only one Air Quality Management Area (AQMA) in the district which is located along the A5 between M6 J12 and Cannock (AQMA No.5 Oak Farm) where there are no allocations proposed.
Burrows, A & D	RES24-031-01	Policy SA3	Site 005 Adjacent sewage drain included as an 'eco' corridor of around 25% by Lonestar Number of houses proposed has increased since the M6 has been widened, which would not be environmentally sound. Increased noise and actual pollution for potential residents Pollution particle measuring boxes on Wolgarston Bridge have been switched off and not collecting data Nothing has changed in terms of access through the Cherrybrook estate which was a previous stumbling block of this proposal. Would be massive increase in traffic through an already unsuitable access point. Variety of wildlife would be harmed by development on this site	Not stated	No	Not stated	The impact upon air quality from development on designated sites has been considered by partner authorities that has incorporated assessments of the predicted growth in vehicular movements across all site allocations. This includes cumulative impacts. Furthermore, there is only one Air Quality Management Area (AQMA) in the district which is located along the A5 between M6 J12 and Cannock (AQMA No.5 Oak Farm) where there are no allocations proposed.  Engagement throughout plan preparation has taken place with Local Highways Authority (Staffordshire County Council). They have not indicated that [access to the site is problematic or unmitigable] the impact of the proposed allocation would not generate any significant impacts on the transport network or highway safety that cannot be mitigated in line with paragraph 114 d of the NPPF.  Specific details regarding the access and egress to the site will be assessed further during any forthcoming planning application. The relevant

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							<p>consultees will be asked to provide comments on the scheme.</p> <p>The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact on habitats sites.</p>
White, J	RES24-250-01	Policy SA3	<p>Site 005</p> <p>The local roads on the Cherrybrook Estate in Penkridge do not provide effective means of access for increased volumes of road traffic</p> <p>There would be much noise and carbon exhaust pollution from the nearby M6 motorway. The latter has enormous traffic volume</p> <p>Cannock Chase is less than 3 miles away. It is an area of Outstanding Natural Beauty.</p>	No	No	No	<p>The impact upon air quality from development on designated sites has been considered by partner authorities that has incorporated assessments of the predicted growth in vehicular movements across all site allocations. This includes cumulative impacts. Furthermore, there is only one Air Quality Management Area (AQMA) in the district which is located along the A5 between M6 J12 and Cannock (AQMA No.5 Oak Farm) where there are no allocations proposed.</p> <p>Engagement throughout plan preparation has taken place with Local Highways Authority (Staffordshire County Council). They have not indicated that [access to the site is problematic or unmitigable] the impact of the proposed allocation would not generate any significant impacts on the transport network or highway safety that cannot be mitigated in line with paragraph 114 d of the NPPF.</p> <p>Specific details regarding the access and egress to the site will be assessed further during any forthcoming planning application. The relevant consultees will be asked to provide comments on the scheme.</p> <p>Any future planning application would be expected to address Policy NB4 insofar as they must conserve and enhance the landscape and scenic beauty of the area and habitats sites and conform with the most up to date SPDs.</p>
Hughes, G	RES24-113-01	Policy SA3	<p>Site 005</p> <p>The council has a duty of care to the residents of cherrybrook</p> <p>The site will increase traffic 40% in an already busy main road</p> <p>Will increase pollution in the area</p> <p>No iteration of this plan could make it sound</p> <p>Safety issue for young children</p>	Not stated	No	Not stated	<p>The impact upon air quality from development on designated sites has been considered by partner authorities that has incorporated assessments of the predicted growth in vehicular movements across all site allocations. This includes cumulative impacts. Furthermore, there is only</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			Site has appeared previously and been rejected				<p>one Air Quality Management Area (AQMA) in the district which is located along the A5 between M6 J12 and Cannock (AQMA No.5 Oak Farm) where there are no allocations proposed.</p> <p>Engagement throughout plan preparation has taken place with Local Highways Authority (Staffordshire County Council). They have not indicated that [access to the site is problematic or unmitigable] the impact of the proposed allocation would not generate any significant impacts on the transport network or highway safety that cannot be mitigated in line with paragraph 114 d of the NPPF.</p> <p>Specific details regarding the access and egress to the site will be assessed further during any forthcoming planning application. The relevant consultees will be asked to provide comments on the scheme.</p>
Harper-Wallis, S	STA24-022-02	Policy SA3 (Appendix C)	<p>The land off Cherrybrook Drive (005) is not feasible for development.</p> <p>This allocation has been in place for years, with developers repeatedly failing to meet policy requirements in past, present, and emerging local plans. The site's small size and flooding issues make it difficult to achieve a viable housing number. Retaining pools would consume much of the usable space. Proximity to the M6 poses significant health risks to residents, and access issues via a small drive exacerbate the problem. Given these concerns, this allocation should be removed or at least reduced to a viable amount.</p>	No	No	No	<p>Comments noted.</p> <p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p>
<b>Penkrige: Site 006 – Land at Boscomoor Lane</b>							
Canal and River Trust	STA24-009-01	Policy SA3	<p>006 Land at Boscomoor Lane</p> <p>Welcome the amendments made to the supporting text recognising that towpath surface, as well as links to the towpath, should be provided, addressing our comments on that allocation.</p>	Not stated	Not stated	Not stated	Comments and support noted.
Staffordshire County Council LLFA	STA24-044-19	Policy SA3	<p>Ref 006 - Land at Boscomoor Lane</p> <p>Surface water - minor ponding.</p> <p>Flooding hotspots - a record of a cluster of instances of internal property flooding in the proximity.</p>	Not stated	Not stated	Not stated	Comments noted.
Pegasus Group for Richborough Estates	AGT24-032-05-02	Policy SA3	<p>The site description can be found in paragraphs 5.1 – 5.4 of the full representation (Boscomoor Lane). The proposed development and vision document can be found in paragraphs 5.1 – 5.3 (paragraph formatting error). Land at Boscomoor Lane is included within policy SA3 and Richborough continue to</p>	Yes	No	Yes	<p>Support of allocation noted.</p> <p>Proposed Green Belt boundary reflects boundary of site 006 as it has been suggested to us, and therefore is considered appropriate.</p>

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			support the housing allocation. However, the proposed Green Belt boundary is not supported. The proposed Green Belt release does not follow a logical form or sustainable pattern for development. Should the Green Belt boundary be altered, the minimum capacity would be increased to reflect this and ensure the site can be developed to full capacity.				
Pegasus Group for Richborough Estates	AGT24-032-05-02	Policy SA3	Richborough welcomes the amended wording to the proforma for Boscomoor Lane which greater reflects the comments set out within the Historic Environment Site Assessment Stage 2. However, objection is raised to the presumption that all hedges or trees can be retained on the site. Inevitably the access to the site or road layout will require some small areas of hedgerows to be removed. The vision document which accompanies this representation indicates the site is capable of accommodating 100 dwellings. It is strongly advised that the LPA increase the minimum number of dwellings on site to a minimum of 90 dwellings.	Yes	No	Yes	Comments noted.  It is acknowledged that a small portion of hedgerow will need to be removed to allow access to the site, the details of this would be assessed at planning application stage.  The yield identified within the site proforma for this proposed allocation is a 'minimum' of 80 dwellings. This is based on the assessment of the site and further details provided through the Housing Site Assessment Topic Paper 2024. As such, it is not considered necessary to increase the yield of the site.
Pegasus Group for Richborough Estates	AGT24-032-05-02	Policy SA3	Land at Boscomoor Lane Details on the following can be found in the full representation – Green Belt (paragraphs 5.11 – 5.34), Landscape Sensitivity (paragraphs 5.35 – 5.43), Sustainability (paragraphs 5.44 – 5.49), Impact on the Historic Environment (paragraphs 5.50 – 5.53), Surface Water Flooding (paragraphs 5.54 – 5.58), Highways (paragraphs 5.59 – 5.60), Suitability / Deliverability (paragraphs 5.61 – 6.65).	Yes	No	Yes	Details on site noted.  No changes proposed.
<b>Penkridge: Omission sites</b>							
<b>Brewood: Site 617 – Four Ashes Road</b>							
Jones, B	RES24-123-01	Policy SA3	Support the inclusion of site 617 Four Ashes Road.	Yes	Yes	Yes	Support noted.
Staffordshire County Council LLFA	STA24-044-19	Policy SA3	Ref 617 - Land at Four Ashes Road Flood Zone 2 and FZ3 to the south and east. Surface water - flow pathways across and on southern boundary of the proposed development site. Flooding hotspots - sparse records of highway flooding in the village.	Not stated	Not stated	Not stated	Comments noted.
Evolve Planning & Design for Four Ashes Road Ltd	AGT24-017-03-01	Policy SA3	Land at Four Ashes Road – this is supported as 'sound'. Details of site delivery are in paragraph 4.4 of the full representation. Four Ashes Road Ltd would question whether the site yield of 63 dwellings underestimates the capacity of the site. The illustrative masterplan included at Appendix A demonstrates that a yield of 73 dwellings is more accurate. Land at Four Ashes Road - details on Sustainability Appraisal,	Yes	Yes	Yes	Comments and support noted.  The yield identified within the site proforma for this proposed allocation is a 'minimum' of 63 dwellings. This is based on the assessment of the site and further details provided through the Housing Site Assessment Topic Paper 2024. As



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**CHAPTER 6 & POLICIES MA1-SA5: SITE ALLOCATIONS**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			Green Belt Harm, Landscape Sensitivity, impact on the historic environment, impact on flood risk and highways are detailed in paragraphs 11.6 – 6.16 (should read as 11.14) of the full representation. Four Ashes Road Ltd holds a land interest in the site and can facilitate development of the site, it is deliverable and immediately available.				such, it is not considered necessary to increase the yield of the site.
Richards, A	RES24-194-01	Policy SA3	I recognise that there is a need to keep a thriving community into the future, and the need for affordable housing in South Staffordshire. I therefore support the 63 households proposed on Four Ashes Road, although the land being green belt is undesirable. The increased traffic won't result in heavy vehicles having travel into the village centre. The access to the A5 and A49 avoid the village centre. The existing congestion in the centre results in heavy duty vehicles and cars mounting the pavements and putting children and adults at risk of serious injury.	Not stated	Not stated	Not stated	Comments and support noted.
Gillespie, I	RES24-083-01	Policy SA3	Recognise the need for controlled housing development. and agree with the premise that the green belt should be protected as much as possible and that access to rail links should be a priority. The Brewood proposals have the benefit of placing new housing with good access to the A5 and A449 without the necessity to enter the village centre at peak times which is when dangerous traffic congestion is already experienced. We regularly see vehicles having to mount pavements at the same time as the village is experiencing maximum pedestrian traffic with children heading to school.	Not stated	Not stated	Not stated	Comments and support noted.
Brewood Civic Society	STA24-008-05	Policy SA3	Brewood Civic Society supports the allocation of 63 houses on site ref 617. However, we make the following comment. The number allocated is a minimum of 63 houses. What is the maximum number of houses? Past experience shows that the number built far exceeds the number allocated, eg. Site 054 Engleton Lane, Brewood was allocated 53 but 73 built.	Not stated	Not stated	Not stated	Comments noted.  There is no maximum quantum for the site allocations set out in the Local Plan, this will be assessed on a case-by-case basis when the site is subject to a planning application.
Knight, P	RES24-134-01	Policy SA3	As a local resident I support the safeguarded land off Four Ashes Road in Brewood. I believe this is adequate and appropriate for the development of the village. The development will help local businesses and not place an excessive burden of traffic or on other facilities.	Not stated	Not stated	Not stated	Comments and support noted.
Knight, C	RES24-130-01	Policy SA3	Support the proposals for Brewood at Four Ashes Road.	Not stated	Not stated	Not stated	Support noted.
Hancher, R	RES24-095-07	Appendix C	Unclear why site 617 in Brewood has been selected as the sole site to deliver the necessary new houses. An alternative site has been proposed by a landowner at Kiddemore Green Road which i) has better connectivity to public transport via an adjacent bus	Yes	No	No	Comments noted.  Site options have been assessed against a consistent set of planning criteria to determine

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			stop, ii) has better walking links to the village core, and iii) is at lower risk of flooding which should be considered if it can achieve the requirements of site 617.				proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.
<b>Brewood: Omission sites</b>							
First City for St Mary's Presbytery and The Archdiocese of Birmingham	AGT24-018-01-15	Policy SA3	<p>We consider there is the requirement for additional land to be allocated for future development in the District including Brewood. We are disappointed to see the removal of site 079 as this site would create an obvious rounding off of the settlement boundary of Brewood in a sustainable location adjacent to the Doctor's surgery. The site would provide much needed family housing but also bungalows and care facilities, as well as car parking for the village.</p> <p>There are no constraints to the site that would hinder delivery. We consider the benefits of the site carry substantial weight in support of the site being considered suitable for removal from the Green Belt even when considered against exceptional circumstances as set out in NPPF paragraph 145.</p>	No	No	No	<p>The Council considers that it would be inappropriate to release additional land from the Green Belt for safeguarded land through this Local Plan, given the need for any such release to be justified by exceptional circumstances.</p> <p>It is acknowledged that the approach to future Green Belt release will be considered through an updated Strategic Growth Study across the GBBCHMA which South Staffordshire will be an active partner in, and it is right to consider this issue strategically across this wider functional geography. To date, no GBBCHMA authority has requested that South Staffordshire provide additional safeguarded land for longer term unmet needs, nor has this been required in recent examinations in the GBBCHMA. Given these factors and the requirement in national policy to review the plan in whole or in part every 5 years, it is not considered appropriate or necessary to release safeguarded land at this stage.</p> <p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p>
Marrons Planning for Boningale Homes	AGT24-027-02-01	Policy SA3	<p>Omission site: Land at Hockerhill Farm, Brewood</p> <p>The subject site comprises land at Hockerhill Farm (Figure 4) measuring 6.82 ha. The site is located in the Green Belt and lies adjacent to the built form of Brewood. An outline planning application has been submitted to South Staffordshire District Council for consideration. The proposed development comprises the following; Up to 85no. residential dwellings; and 80 bed Care Facility. The site is in Flood Zone 1 and there are no listed buildings on site. Brewood is identified by the Council as being a Tier 2 settlement and is a secondary focus of growth for South Staffordshire. The settlement is inherently sustainable and is home to a number of services and facilities.</p>	Not stated	No	Not stated	<p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home</p>

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			The site is controlled by Boningale Homes who are committed to the development of the site, and as such, the site is considered to be immediately, available, achievable and deliverable and as such, we consider that the Council should seek to allocate the site for development without delay.				contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).
<b>Huntington: Site 016 - Land at Pear Tree Farm</b>							
Staffordshire County Council LLFA	STA24-044-19	Policy SA3	Ref 016 - Land at Pear Tree Farm Surface water - extensive and significant flow pathway in the southern part of the site. Flooding hotspots - one record of historic flooding on the southeast corner of the proposed development site.	Not stated	Not stated	Not stated	Comments noted.
Sport England	STA24-042-04	Policy SA3	Welcome the pro forma for the site containing a key requirement that 'Development must not prejudice use of the adjacent playing field site and must ensure that any proposed layout retains an access to this facility.	Yes	Yes	Yes	Comments noted.
Environment Agency	STA24-019-01	Policy SA3	Site 016 - this site is proposed close to SB Waste Management (Huntington) The site is a relatively small scale transfer station. Amenity issues are likely to be raised by any developments adjacent to the site.	Not stated	Not stated	Not stated	Comments noted.  This will be fully assessed at planning application stage.
Grade Planning	AGT24-021-01-01	Policy SA3	The proposed site allocation is supported. This site is in a highly sustainable location for residential development, a short walk from the village's local shops, services and community school, and adjacent to a designated open space (playing fields). The site is on safeguarded land therefore offers an opportunity to provide new housing to support South Staffordshire's identified growth, on a non-Green Belt site.	Not stated	Not stated	Not stated	Comments and support noted.
Grade Planning	AGT24-021-01-01	Policy SA3 (Appendix C)	The text on page 203 under the site 016 (Pear Tree Farm) pro forma appears to be incorrect. Pear Tree Farm is not a Grade II Listed Farmhouse. The nearest Grade II listed building is some distance to the south at Huntington Farmhouse - considerably separated from the site by an industrial area and other existing buildings.  In addition, the last bullet point should not set out the highways requirements for the site, as any necessary highways mitigation measures are yet to be tested and assessed through the planning application process and a detailed Transport Assessment.	Yes	Yes	Yes	The Grade II farmhouse is Huntington Farmhouse (List no. 1039177). Its setting needs to be considered at the planning application stage, as set out in the Historic Environment Site Assessment (2022) recommendations.  The final bullet point does not require detailed highways measures but just identifies where the site will be accessed (as agreed following consultation with the highways authority - Staffordshire County Council).  No change proposed.
<b>Huntington: Omission sites</b>							
Emery Planning for Seabridge Development Ltd	AGT24-016-01-04	Policy SA3	Our client proposes an omission site for allocation (land north of Sycamore Way, Huntington). The site is currently in equine use and comprises stables, a menage and paddocks.	Not stated	No	Not stated	Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.

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			<p>The site is PDL as the operation of the stables, menage and paddocks are physically and functionally related to one another, and the use of the existing buildings is intrinsically linked to the operation and use of the paddocks. In line with para 147 of the NPPF, As the site comprises previously developed land, it should be given first consideration for release. It is considered that the development of the site would have little if any impact on the purposes of the Green Belt. We propose that an allocation of the site for approximately 50-60 dwellings would not comprise major development in the AONB for the purposes of paragraph 183 of the Framework, Furthermore, taking into account the existing topography and the potential for an appropriately designed scheme including landscaping, the development of the site would not have a significant adverse impact on the purposes for which the area has been designated as an AONB. Without prejudice to the above, should it be considered that a proposed allocation would comprise major development within the AONB, we consider that exceptional circumstances can be demonstrated, in terms of the need for the proposed development and the limited impact that it would have upon the AONB.</p> <p>Huntington is a highly sustainable settlement with a wide range of services an excellent bus services to Cannock and Stafford. No technical constraints exist which could not be adequately addressed or mitigated as part of the proposed development The site is suitable, achievable and available, and would be deliverable in the short term. It is capable of delivering dwellings to meet South Staffordshire’s housing needs and those of the wider GBBCHMA. We therefore respectfully request that it is considered a new allocation through the Local Plan Review. Alternatively, if the site is not allocated in the current Local Plan Review, we request that it is considered for an allocation through the next plan review.</p>				<p>Justification for the council’s spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district’s growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan’s ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council’s Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p>
RPS Group for IM Land	AGT24-036-01-02	Policy SA3	<p>Policy SA3 of the second Reg 19 Plan identifies just one site for allocation at Huntington (Land at Pear Tree Farm) for 39 dwellings (site 016). However, once this site is allocated in the new local plan, there will be no other safeguarded residential sites identified at Huntington. RPS contend that, in the context of an ever decreasing supply of non-Green Belt brownfield land, and a very tightly-drawn boundary around the village, in order to provide for an orderly release of land to meet future needs beyond the new plan period (to 2041) the Council should take the opportunity to identify safeguarded land at Huntington to replace site 016.</p> <p>In response to the evidence presented in this submission, the Council should at the very least remove from the Green Belt the Land north of Limepit Lane (portion of site 591) that was</p>	Not stated	No	Not stated	<p>The Council considers that it would be inappropriate to release additional land from the Green Belt for safeguarded land through this Local Plan, given the need for any such release to be justified by exceptional circumstances.</p> <p>It is acknowledged that the approach to future Green Belt release will be considered through an updated Strategic Growth Study across the GBBCHMA which South Staffordshire will be an active partner in, and it is right to consider this issue strategically across this wider functional geography. To date, no GBBCHMA authority has requested that South Staffordshire provide additional safeguarded land for longer term</p>

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			<p>previously proposed for allocation at the preferred options stage in 2021.</p> <p>In addition, in response to the evidence presented in this submission, the remaining extent of site 591 should also be released from the Green Belt and allocated for housing in the SSLP</p> <p>Alternatively, site 591 should be safeguarded for future release from the Green Belt as part of the next local plan review process to address future housing needs at Huntington.</p>				<p>unmet needs, nor has this been required in recent examinations in the GBBCHMA. Given these factors and the requirement in national policy to review the plan in whole or in part every 5 years, it is not considered appropriate or necessary to release safeguarded land at this stage.</p> <p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p>
RPS Group for IM Land	AGT24-036-01-02	Policy SA3	<p>An appropriate remedy that could be taken forward relatively swiftly is for additional land to be identified at the most sustainable settlements where growth is not already identified or where it is currently restricted. A particular settlement where growth is restricted is at Huntington. A suitable and deliverable site in this location is 'Land north of Limepit Lane' (site 591). This site was previously proposed for allocation at the draft Plan (Regulation 18) stage consulted on in 2021. This would help increase supply in the short-term during the early years of the plan, helping to increase delivery overall but also to assist in the delivery of affordable housing.</p>	Not stated	No	Not stated	<p>The Council considers that it would be inappropriate to release additional land from the Green Belt for safeguarded land through this Local Plan, given the need for any such release to be justified by exceptional circumstances.</p> <p>It is acknowledged that the approach to future Green Belt release will be considered through an updated Strategic Growth Study across the GBBCHMA which South Staffordshire will be an active partner in, and it is right to consider this issue strategically across this wider functional geography. To date, no GBBCHMA authority has requested that South Staffordshire provide additional safeguarded land for longer term unmet needs, nor has this been required in recent examinations in the GBBCHMA. Given these factors and the requirement in national policy to review the plan in whole or in part every 5 years, it is not considered appropriate or necessary to release safeguarded land at this stage.</p> <p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p>
<b>Kinver: Site 274 – Land south of White Hill</b>							
Kinver Parish Council	STA24-025-03	Policy SA3	<p>When applying site assessment factors consistently Site 274b would not be considered favourable for development. If the site is developed these factors would require careful consideration and mitigation: Land is prominent from Kinver Edge. Site is in an area of strategic importance to strengthen links between Kinver Edge and Highgate Common being one of the narrower parts of the Heathland Habitat Connectivity Opportunity Area. Protection</p>	Not stated	Not stated	Not stated	<p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024. The plan includes strong design (Policy HC10), open space (Policy HC17), education (Policy HC15) and health (Policy HC14) policies to ensure that new</p>



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			of hedgerows trees and the boundary with adjacent green spaces is vital. Site would create urban surroundings along the Staffordshire Way. Site would see the loss of a recreation/walking area. Site will see increase in car journeys and walking and cycling provision is currently poor. Scale of development would not result in additional infrastructure. Should monitor impact of site 274a in relation to highway safety before any further development takes place.				development is of high quality and delivers the necessary infrastructure.  Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies. Engagement throughout plan preparation has taken place with Local Highways Authority, School Organisation Team (SOT) (both Staffordshire County Council), and Staffordshire and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical Commissioning Group). None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities, or addressed through proposed Policies HC14, and HC15.
Kinver Parish Council	STA24-025-04	Policy SA3	SHELAA 2023 identifies Site 274b within HEA area of particular sensitivity and it is unclear how this will be mitigated. Further constraints on the site include ProWs running through site; important GI providing linking corridor between Kinver Edge and rural surroundings; adjoins National Trust land and closely connected by woodland to SSSI Kinver Edge; is within habitat corridor between areas of lowland health; views to Kinver Edge and Potters Cross Farm; and issues of access and impact on road pedestrian safety due to increased population.	Not stated	Not stated	Not stated	Site 274b is exiting safeguarded land and was identified suitable for Green Belt release through the examination into the 2018 Site Allocations Document (SAD).  Whilst the Council needs to prioritise non-Green Belt land such as site 274b as part of demonstrating exceptional circumstances, the site has been fully reassessed through the Housing Site Assessment Topic Paper 2024 and identified as remaining suitable for allocation. Consultation with infrastructure and service providers has not identified any 'showstopper' constraints which cannot be addressed through appropriate mitigation.  No change proposed.
Avison Young for Crest Nicholson	AGT24-004-02-03	Policy SA3	Crest fully supports the allocation of the land south of White Hill, Kinver for housing development. The site was identified as suitable through the 2018 SAD DPD and is necessary for the Council to be able to demonstrate compliance with paragraph 146 of the NPPF. The site is deliverable, available now, suitable and achievable. The site has good access to nearby facilities and is served by a bus stop located within 200m. highways work demonstrates that the site can deliver the proposed allocation without unacceptable impacts on the local road network. ALC report confirms land is Grades 3b and 4 and the site will deliver a number of benefits including market and affordable housing in a range of sizes and types as well as a considerable number of other benefits.	Yes	Yes	Not stated	Comments and support noted.

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Turley Associates for Bellway Homes	AGT24-041-01-02	Policy SA3	Land south of White Hill, Kinver Bellway has concerns regarding the likely impacts of developing this site. Harm to the Kinver Camp Scheduled Monument and landscape are detailed in paragraphs 3.33 – 3.35 of the full representation. Sites at Hyde Lane and Dunsley Drive deliver the same public benefits with less harm to designated heritage assets and will provide a better landscape and visual response.	No	No	No	Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024. The plan includes strong design (Policy HC10), open space (Policy HC17), education (Policy HC15) and health (Policy HC14) policies to ensure that new development is of high quality and delivers the necessary infrastructure.  The impact upon the historic environment has been assessed on a site-by-site basis through the preparation of a Historic Environment Site Assessment (HESA) which has informed the site selection process.
<b>Kinver: Omission sites</b>							
Harris Lamb for Folkes	AGT24-022-01-01	Policy SA3	Folkes are promoting land at Lawnswood for a proposed residential development to accommodate approximately 475 dwellings to meet the needs of South Staffordshire or the unmet need arising in the wider HMA. It is considered that sustainable sites on the edge of the conurbation, including Folkes' site at Lawnswood should be included in SA3 for it to be effective and sound. Details on this site can be found in the full representation, including a Vision Document which was previously submitted.	Not stated	No	No	Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.  Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.  The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).
Savills UK Ltd for Clowes Developments Ltd	AGT24-037-02-09	Policy SA3	We object to SA3 because it is not justified, and therefore does not meet the tests of soundness. We consider this policy should be amended to include Land at Lawnswood Road (site 654). We have critiqued the Council's evidence base position and reviewed this against a new evidence base which provides a more detailed assessment of the site specific position. All details relating to this assessment and the development proposals for the site can be found in the full representation (SA3).	Yes	No	Yes	Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.  Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper

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							<p>2024.This balances the district’s growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan’s ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council’s Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p>
Turley Associates for Bellway Homes	AGT24-042-01-02	Policy SA3	<p>Land west of Hyde Lane, Kinver</p> <p>A site location plan is included at Appendix 2 and will provide between 45 and 200 dwellings, public open space, and associated infrastructure. It was previously proposed for allocation for 44 new homes in the 2022 Publication Plan. The site can provide up to 200 dwellings and is therefore capable of making a greater contribution to the housing needs given the anticipated rates of delivery on strategic sites are ambitious. The Council’s evidence is clear this site performs better than other options at Kinver. Further details on the site and surrounding area can be found in paragraphs 3.28-3.31 of the full representation.</p>	No	No	No	<p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>Justification for the council’s spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024.This balances the district’s growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan’s ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council’s Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p>
Turley Associates for Bellway Homes	AGT24-042-01-02	Policy SA3	<p>Land east of Dunsley Drive, Kinver</p> <p>A site location plan is included at Appendix 4 and will provide up to 36 dwellings, public open space, and associated infrastructure. Further details on the site and surrounding area can be found in paragraphs 3.38 – 3.43 of the full representation. The capacity at White Hill should be reduced or deleted completely, and Dunsley Drive and/or Hyde Lane added into the policy.</p>	No	No	No	<p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>Justification for the council’s spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024.This balances the district’s growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan’s ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home</p>

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							contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).
Savills UK Ltd for Barratt Homes	AGT24-038-01-08	Policy SA3	We object to SA3 and consider that Land to the North and South of Dunsley Road, Kinver should be allocated for residential development. Kinver is the most sustainable settlement in the southern part of the district with good access to the Black Country and therefore additional housing growth should be directed here. Barratt is promoting the above site which could deliver approximately 350 dwellings and public open space. Site 549 (north) was assessed as 'sites potentially suitable for housing but not currently developable because of a policy designation' and site 550 (south) was assessed as 'sites which are unsuitable because of constraints which cannot be overcome'. Full details of these assessments can be found in the formal representation. A range of technical work has been undertaken to support the promotion of the sites.	Not stated	No	Not stated	<p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p>
<b>Perton: Site 239 - Land west of Wrottesley Park Road (south)</b>							
Staffordshire County Council LLFA	STA24-044-19	Policy SA3	Ref 239 - Land west of Wrottesley Park Road Surface water - minor ponding and flow pathways. Flooding hotspots - hotspots downstream.	Not stated	Not stated	Not stated	Comments noted.
Carter Jonas for Land Fund Perton	AGT24-008-01-01	Policy SA3	Site 239 - Land west of Wrottesley Park Road (south) Support the allocation of site 239. Positively prepared as it contributes to meeting housing need and assists in significantly boosting the supply of homes, providing an opportunity to deliver a mix of housing to meet the needs of the local community. The Council's decision to allocate the site is derived from a robust evidence base. The site was assessed through the SAD, removed from the Green Belt and safeguarded to meet the long term needs of South Staffordshire. The Housing Site Selection Topic Paper underpins this. The site will retain trees and hedgerows on the border and will include a comprehensive landscaping scheme. Any historic environment mitigation will be undertaken. Any forthcoming planning application will be supported by a Transport Assessment and pedestrian/vehicular access in line with the SoCG.	Not stated	Yes	Not stated	Comments and support noted.

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			The Publication Plan meets the test of soundness.				
Ratcliffe, B	RES24-191-01	Policy SA3	<p>The government is making a big deal of car emissions and making our world a greener.</p> <p>The green belt is an important factor to all our wildlife this includes bees which without them we would not survive</p> <p>We will be susceptible to more flooding as there will not be enough drainage as more concrete is being laid</p> <p>Perton does not have enough doctors, dentists or schools to accommodate more people</p> <p>The traffic congestion will be increased tenfold in the surrounding areas</p> <p>Countryside is good for the wellbeing and mental health</p> <p>There are enough factory and derelict building that could be used</p>	Not stated	Not stated	Not stated	<p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024. The plan includes strong design (Policy HC10), open space (Policy HC17), education (Policy HC15) and health (Policy HC14) policies to ensure that new development is of high quality and delivers the necessary infrastructure.</p> <p>Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies. Engagement throughout plan preparation has taken place with Local Highways Authority, School Organisation Team (SOT) (both Staffordshire County Council), and Staffordshire and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical Commissioning Group). None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities, or addressed through proposed Policies HC14, and HC15.</p>
<b>Perton: Omission sites</b>							
Avison Young for Beard, G	AGT24-004-01-02	Policy SA3	<p>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. 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 or conflict with the 5 purposes of the Green Belt in a meaningful way. The Council's 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,</p> <p>The proposed development options for a sliding scale of development and could deliver affordable housing and economic benefits in a sustainable location that is well located in terms of access to sustainable modes of transport including bus routes and rail.</p>	No	No	No	<p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p>



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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
RCA Regeneration for Barberry Developments	AGT24-036-01-02	Policy SA3	<p>The housing allocations at Policy SA3 do not allocate any housing to urban edge sites, which would take advantage of existing services and transport infrastructure of neighbouring Black Country settlements. We do not agree with allocations over reliant on the tiered settlements of South Staffordshire as this completely ignores the fact that the authority is inter-dependent with the Black Country for employment, retail and educational opportunities and that meeting the needs of the Black Country will require the release of some Green Belt land within South Staffordshire: something that was acknowledged in the later iteration of the emerging Black Country Plan and the previous Reg 19 Local Plan for South Staffordshire published in 2022.</p> <p>Regarding land to the East of Wrottesley Park Road, Perton, apart from being within the Green Belt, the site is considered to be unconstrained. the site could deliver around 600 new market and affordable homes, without the need for major infrastructure investment. The site relates well to the existing established settlement edge of Perton, whilst having the opportunity to provide a more definitive boundary to the Green Belt beyond. The site would also seek to deliver expansive areas of green infrastructure, which would be an example of biodiversity net gain. Site benefits locationally in relation to the existing facilities within a close proximity of the site. We believe that the site could deliver a successful example of sustainable development which would benefit the public realm extensively. An allocation here would serve as a logical site to deliver unmet housing need arising from neighbouring authorities of Dudley and Wolverhampton who continue to be unable to deliver their own housing need within their boundaries. We urge that the council should give further consideration to our client's site: Land to the east of Wrottesley Park Road and it should be included as a housing allocation within the Submission Plan.</p>	No	No	No	<p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The Rural Services and Facilities Audit 2021 informs the spatial strategy set out in Policy DS5. It is considered that this takes a balanced approach that will lead to a sustainable pattern of development by focusing growth of the district's most sustainable Tier 1 settlements. The strategic approach does still allow for limited development in lower Tier 4 and 5 settlements, including limited affordable housing.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p>
Harris Lamb for Redrow Homes	AGT24-022-03-15	Policy SA3	<p>In principle, we do not have any specific objections against the sites that have been chosen and we consider that all of them would be required in order to meet the housing requirement that has been identified. Whilst RH do not object to specific sites, we do object to the omission of the land at Castlecroft Farm as a proposed housing allocation in the Plan. Our objection is based on the fact that we consider that a significantly larger number of dwellings is required to meet the unmet needs arising in the HMA as had previously been proposed by the Council. Full details of the site at Castlecroft Farm can be found in the full representation.</p> <p>To address RH's concerns the inclusion of the site as a draft allocation for 600 dwellings would address the soundness issue.</p>	Yes	No	Not stated	<p>Comments noted.</p> <p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the</p>

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							<p>plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p>
Pegasus Group for Richborough Estates	AGT24-030-05-35	Policy SA3	<p>The overarching thrust that new housing development should be focused in sustainable locations in the District is supported. However, it is considered that to achieve a well-balanced and sustainable growth across the District over the plan period, it is important that a range of sites are allocated for housing.</p> <p>Perton is a Tier 2 settlement with access to employment and a range of facilities as well as a frequent bus route which connects to Wolverhampton, Codsall, Pattingham and the centre of Perton village. It is considered that Perton is a sustainable settlement within South Staffordshire District Council, capable of supporting housing growth to meet housing need and accessible to public transport in line with the Plan's spatial strategy. Perton benefits from a good level of essential community facilities and a wider range of public transport and supporting infrastructure.</p> <p>The promoted site west of Wrottesley Park Road is adjacent the proposed allocated site and so in term of sustainability is compatible. The site would also deliver additional benefits in the form of a country park. If the LPA do not wish to allocate the site for housing, Richborough strongly encourage the Council to safeguard the land west of Wrottesley Park Road, Perton for future development, which could assist in addressing the GBBCHMA unmet housing need in the future and ensure that Green Belt boundaries set in the Local Plan endure.</p> <p>In terms of the SA assessment of the site, Richborough disputes the above post-mitigation findings, particularly in respect of biodiversity, landscape, and townscape and education with the SA failing to take account of the proposal to deliver a country park and a new first school. It is contended that the SA impact score for Landscape and Townscape should duly be tempered to a Minor Negative ('-') score. The site is therefore considered capable of providing good access to both primary and secondary schools, in fact it could improve education provision at primary level, and should accordingly score a Minor Positive ('+') score in respect of education.</p> <p>In terms of the Green Belt study, as the side would not extend further west than the proposed allocation, the site is overall considered to make a moderate contribution to the purposes of</p>	Yes	No	Yes	<p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The Rural Services and Facilities Audit 2021 informs the spatial strategy set out in Policy DS5. It is considered that this takes a balanced approach that will lead to a sustainable pattern of development by focusing growth of the district's most sustainable Tier 1 settlements. The strategic approach does still allow for limited development in lower Tier 4 and 5 settlements, including limited affordable housing.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p>

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			<p>the Green Belt. Given the reduced impact upon the five purposes of the Green Belt set out above in Table 5.2, is contented that the Green Belt harm identified within the Study should be reduced from 'moderate-high' to 'low-moderate'.</p> <p>Unclear how site is assessed as having low access to employment in the 2021 RSFA. An initial strategy has been developed to improve the operation of Perton light junction on the A41, focussed on increasing the capacity of the two A41 approach arms. Site will have a positive impact on the natural environment is free of constraints and will deliver a considerable number of site specific opportunities. The site is deliverable and immediately available and subject to allocation, could deliver homes and associated community early in the plan period.</p>				
<b>Wombourne: Site 416/416a – Land off Orton Lane</b>							
Heathcock, M	RES24-103-01	Policy SA3	Concern over increased flooding risk. Village is at capacity in terms of schools, doctors surgeries etc. Local hospitals at capacity, roads overcrowded, negative environmental impact of loss of greenfield sites.	Not stated	Not stated	Not stated	Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies. Engagement throughout plan preparation has taken place with Local Highways Authority, School Organisation Team (SOT) (both Staffordshire County Council), and Staffordshire and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical Commissioning Group). None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities, or addressed through proposed Policies HC14, and HC15.
Turley Associates for Bellway Homes	AGT24-041-01-04	Policy SA3	Land off Orton Lane, Wombourne We support the continued allocation of the site within the latest Publication Plan. It represents a sustainable and deliverable residential opportunity with a live full planning application being assessed. We will continue to work with St Philips to ensure the masterplans for both sites are coordinated and capable of working together, including connections between the two sites. Further details of the site can be found in paragraphs 3.16 – 3.22 of the full representation, including breakdown of housing mix etc.	No	No	No	Comments and support noted.
Perkins, C	RES24-178-01	Policy SA3	Site 416 – Land off Orton Lane, Wombourne  Further to the comments made on the planning website, this land has been maintained by myself and previous residents who have resided at [address given] for many years, enquiring into adopting the land. SSDC have confirmed the land does not belong to them and as far as they are aware it's no man's land.	Not stated	Not stated	Not stated	<p>Comments noted.</p> <p>The site-specific details will be assessed and dealt with during the planning application stage.</p> <p>The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to identify – amongst other things – allocations</p>

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			<p>The land does not belong to Bellway housing who wish to install a 2m footway across it. To adopt this land would cost a minimum of £20k, money to the average person that is not reachable. I strongly oppose this stretch of land that crosses directly in front of my property. This will make my property less secure by providing easier access. Also do not want the additional footfall and extra litter that emanating from people passing onto the development and beyond.</p> <p>The smaller circle is showing the location of a proposed electrical substation, on the plan this is easily within 2m of my boundary. Next to this would be a pool catching the run-off water from the development. My property starts at a lower level than this and fear this would put my property at risk of from flooding with global warming and the amount of rain and storms experienced now.</p> <p>A substantial amount of lighting to be provided for the estate will cause a large amount of light pollution to the rear of my property and also effect the wildlife such as the bats which currently feed on the flies in the evening in the area.</p>				<p>which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact on habitats sites.</p>
Lochhead, C	RES24-137-01	Policy SA3	<p>Site 416 – land off Orton Lane, Wombourne More dwellings with more vehicles will lead to parking issues and issues with refuse collection More bungalows for the increasing senior members of the community Wombourne, residents may be encouraged to move out to Orton Lane proposed plots. Enabling their existing homes in the village available for younger families who have closer access to schools meaning walking rather than clogging up roads such as School, Ounsdale and Sytch Lane. Development should be affordable bungalows Area of great biodiversity Increased pollution from increased traffic Increased traffic will impact horse riders</p>	Not stated	Not stated	Not stated	<p>Engagement throughout plan preparation has taken place with Local Highways Authority (Staffordshire County Council). They have not indicated that [access to the site is problematic or unmitigable] the impact of the proposed allocation would not generate any significant impacts on the transport network or highway safety that cannot be mitigated in line with paragraph 114 d of the NPPF.</p> <p>The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact on habitats sites.</p> <p>Housing mix will be secured at outline stage either via condition or S106 agreement. This approach ensures developers and landowners are made aware of the Council's expectations at an early stage and can be taken into consideration for land transactions. The Council views this an appropriate approach to ensure sites meet local housing need and to safeguard the deliverability of sites.</p>

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							The Strategic Housing Market Assessment has set out the recommended split of affordable housing in order to most effectively meet need across the district over the plan period. The requirement for plans to be reviewed in full or in part every 5 years will provide the opportunity to update the policy, should the latest Housing Market Assessment indicate this to no longer be appropriate. It is important to be clear on the Council's expectations for tenure split, as set out in the draft policy, as this will impact on viability and therefore site deliverability.
<b>Wombourne: Site 285, 459, 562/415 – Pool House Road</b>							
Barnes, J	RES24-009-01	Policy SA3	Object to Pool House Road proposal, increased congestion, inadequate existing medical, school and social facilities, these will deteriorate further.	Not stated	Not stated	Not stated	Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies. Engagement throughout plan preparation has taken place with Local Highways Authority, School Organisation Team (SOT) (both Staffordshire County Council), and Staffordshire and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical Commissioning Group). None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities, or addressed through proposed Policies HC14, and HC15.
Staffordshire County Council LLFA	STA24-044-19	Policy SA3	Ref 285 - Pool House Road Surface water - very significant surface water risk; extensive flow pathway and ponding. Ref 459 - Pool House Road Surface water - flow pathway to the west of the proposed development site.	Not stated	Not stated	Not stated	Comments noted.
Evolve Planning & Design for Lovell Homes	AGT24-017-05-03	Policy SA3	Land at Pool House Road - this is supported as 'sound' by Lovell Homes who have a current interest in this land. Details of the proposed allocation in paragraph 4.4 of the full representation. Lovell Homes would question whether site 459 would be capable of delivering a minimum of 97 dwellings, as set out in the site proforma at Appendix C due to the presence of electricity pylons and associated easements. A more realistic assumption would be in the region of 65 dwellings as demonstrated through a current planning application.  Land at Pool House Road - details on Sustainability Appraisal, Green Belt Harm, Landscape Sensitivity, impact on the historic environment, impact on flood risk and highways are detailed in	Yes	Yes	Yes	Comments and site details noted.  Minor modification 010: - P.65 (sites 285, 562/415, 459)  Minimum Capacity (dwellings): 223 <b>191</b>  Minor modification 063: - P.218 (site 459 proforma)  "Minimum capacity: 97 <b>65</b> dwellings"



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			paragraphs 12.5 - 12.14 of the full representation. Lovell Homes owns sites 562 and 415 and has an option to purchase site 459 and therefore can facilitate development of the site. The site is deliverable and immediately available.				
National Grid Electricity Distribution (Lucy White Planning)	STA24-030-01	Policy SA3	Site Reference 459 - Land Off Pool House Lane, Wombourne The site is identified for delivery of 97 dwellings in combination with sites 285, 562 and 415. The key requirements and proposals set out for the allocation at page 218 of the Local Plan fail to identify the presence of high voltage overhead lines across site 459 which form part of NGED's strategic infrastructure. Although there are no pylons present on the site, the presence of the overhead lines, the need for such lines to be retained and incorporated into any residential masterplan must be acknowledged through the site allocation and established as design requirements. As drafted, the policy allocation is ineffective in providing sufficient guidance to ensure the delivery of an appropriate residential scheme which responds positively to site constraints and safeguards NGED's strategic infrastructure. In order to achieve a sound policy the policy should be amended to include reference to the presence of the overhead line and the need for careful design to safeguard its route and achieve appropriate set back.	Not stated	No	Not stated	Comments noted.  Minor modification 065: – bullet point on proforma to state <b>"the presence of high voltage overhead lines across the site will need to be retained and incorporated into any residential development"</b>
National Grid Electricity Transmission (Avison Young)	STA24-031-01	Policy SA3	Site Reference 459 – Land Off Pool House Lane, Wombourne Site is crossed/in close proximity to National Grid Electricity Transmission (NGET) assets. Policies relating to site allocations should be amended to include the following wording: 'a strategy for responding to the NGET overhead transmission lines present within the site which demonstrates how the NGET Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design.'	Not stated	Not stated	Not stated	Comments noted.  See minor modification 065 above.
Pegasus Group for Taylor Wimpey	AGT24-032-08-02	Policy SA3	Land off Pool House Road is included with SA3 as an allocation for a minimum of 82 dwellings. This is supported by Taylor Wimpey but some minor amendments are required to ensure the policy is sound. Details regarding Wombourne can be found in paragraphs 5.3 – 5.7 of the full representation. This site is capable of early development in the first five years of the plan, and all site details can be found in paragraphs 5.11 – 5.14 of the representation, with the sustainable connectivity details in paragraphs 5.15 – 5.20.  As outlined in the site proforma, a specific requirement is for highway and pedestrian connectivity between site 285 and site 459, but due to intervening third party land on the public right of way, Taylor Wimpey cannot provide a link between the sites. It is therefore necessary that the proforma be amended to state	Not stated	No	Not stated	Comments and support noted.  Minor modification 062: p. 214: Provide highway and pedestrian connectivity to site 459.  Minor modification 064: p. 218: Provide highway and pedestrian connectivity to site 285.

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			that only pedestrian access is required between the sites. This would ensure that the site-specific matters for site 285 within SA3 is legally compliant.				
Miles, D.J	RES24-150-01	Policy SA3	Poolhouse Road, Wombourne Poolhouse Road is a traffic 'nightmare' Development would destroy green belt land and wildlife in the area	Not stated	Not stated	Not stated	<p>The council's Green Belt Study (2019) takes a strategic view for considering the harm of releasing land from the Green Belt. Its methodology ensures that if there are variations to the harm of releasing land from the green belt within the wider land parcel, then this is reflected in the assessment results.</p> <p>Engagement throughout plan preparation has taken place with Local Highways Authority (Staffordshire County Council). They have not indicated that [access to the site is problematic or unmitigable] the impact of the proposed allocation would not generate any significant impacts on the transport network or highway safety that cannot be mitigated in line with paragraph 114 d of the NPPF.</p>
Marsh, J	RES24-140-01	Policy SA3	Poolhouse fields are an inappropriate site for housing. These are green fields and planners have failed to identify a single brownfield site. They contribute enormously to the semirural character of Wombourne and its village status. Removal of these fields pushes Wombourne into the population of a small town, which is not something anybody here wants, and creates a continuous unbroken line of housing from one end of Wombourne to the next. There is no plan to improve the environment in any way shape or form by bulldozing 3 fields to build houses and add 500+cars	Not stated	Not stated	Not stated	<p>The Council considers that its approach to Green Belt land is consistent with national planning policy, demonstrating exceptional circumstances in a manner consistent with NPPF requirements. See the Green Belt Exceptional Circumstances Topic Paper 2024 for these.</p> <p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p>
<b>Wombourne: Omission sites</b>							
Marrons Planning for Bloor Homes	AGT24-027-01-05	Policy SA3	An objection to draft Policy SA3 is made due to the omission of Land north of Bridgnorth Road which should be allocated for residential development, Wombourne as an allocation for housing. is evident that Site 283 performs better than other proposed allocations around Wombourne, contrary to the Site Selection Proformas' conclusion. In summary, Site 283 is suitable, available and deliverable and is in an area of low landscape sensitivity and affords a lesser contribution to the Green Belt than the wider parcel S27. There is an opportunity to provide substantial landscape enhancements through green corridors, buffering and the reinforcement of existing hedgerows. The site is well connected to services and facilities and will integrate well with an existing sustainable settlement.	Yes	No	Yes	<p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p>

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							The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).
Stansgate Planning for Payne Hicks Beach Trust Corporation Ltd	AGT24-040-01-04	Policy SA3	<p>The Local Plan does not provide sufficient housing allocations or policies to adequately address the housing needs of the Housing Market Area. See separate representations made in respect of Policies DS4 and DS5 and the Duty to Co-operate.</p> <p>The proposed housing allocations set out at Policy SA3 will deliver insufficient housing over the plan period and do not reflect a positively prepared plan to deliver sustainable development assisting in meeting the unmet needs of neighbouring authorities.</p> <p>Policy SA3 should include a greater number of housing allocations to ensure the provision of housing across the District to meet the objectively assessed needs of the area plus an appropriate level of unmet needs from neighbouring authorities. Wombourne should be re-classified as a Tier 1 settlement (see separate representations made in respect of Policy DS5) and additional housing allocations proposed in this locality to reflect its sustainable location and access to services and facilities.</p>	No	No	No	<p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The Rural Services and Facilities Audit 2021 informs the spatial strategy set out in Policy DS5. It is considered that this takes a balanced approach that will lead to a sustainable pattern of development by focusing growth of the district's most sustainable Tier 1 settlements. The strategic approach does still allow for limited development in lower Tier 4 and 5 settlements, including limited affordable housing.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p>
RCA Regeneration for Richborough Estates	AGT24-036-02-02	Policy SA3	<p>The housing allocations at Policy SA3 do not allocate any housing to Wombourne other than safeguarded sites, which seems to be poorly conceived if the council are to make any serious headway with housing delivery to meet need.</p> <p>The 2022 EDNA identified Wombourne as part of the top tier of retail centres. Commuter trips are generally shorter in this area and Wombourne itself is one of the three main employment centres in the Borough providing a significant number of jobs and business opportunities at Heathmill Road Industrial Estate, Smestow Bridge Industrial Estate and Wombourne Enterprise</p>	Not stated	No	No	<p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth</p>

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			<p>Park as well as in the retail centre. Making significant housing allocations in Wombourne would take advantage of its clear sustainability as a settlement and major source of multiple forms of employment.</p> <p>Regarding the site Land south of Bridgnorth Road, Wombourne, other than Green Belt and proximity to Wombourne Conservation Area the site is unconstrained. The site would provide the community with a new park and open space. The site could also be delivered within the first five years of the Plan period, without the need for major infrastructure investment. The site relates well to the existing established settlement edge of Wombourne, whilst having the opportunity to provide a more definitive boundary to the Green Belt beyond. Overall, for the reasons stated above, we believe that the site could deliver a successful example of sustainable development which would benefit the public realm extensively. Richborough Estates have submitted a vision document as part of our previous representations which further details the benefits of the site. This has been included in Appendix A. We urge that the council should give further consideration to our client's site: Land South of Bridgnorth Road, Wombourne and it should be included as a housing allocation within the Submission Plan.</p>				<p>opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The Rural Services and Facilities Audit 2021 informs the spatial strategy set out in Policy DS5. It is considered that this takes a balanced approach that will lead to a sustainable pattern of development by focusing growth of the district's most sustainable Tier 1 settlements. The strategic approach does still allow for limited development in lower Tier 4 and 5 settlements, including limited affordable housing.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p>
Turley Associates for Bellway Homes Ltd	AGT24-041-01-04	Policy SA3	<p>Land west of Strathmore Crescent, Wombourne Bellway controls additional land beyond Orton Lane which has the potential to deliver an additional 40-50 homes, forming an extension of the proposed allocation off Orton Lane. The small-scale nature of this site represents a suitable and sustainable opportunity for growth at Wombourne, requiring limited Green Belt release. Appendix 6 considers the contribution to the Green Belt and concludes there is limited contribution to the open character of the wider Green Belt. On this basis, the release of the site from the Green Belt would not have a significant impact on the integrity of the Green Belt.</p>	No	No	No	<p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p>
Turley Associates for Bellway Homes Ltd	AGT24-041-01-04	Policy SA3	<p>Land off Billy Buns Lane and Gilbert Lane, Wombourne As set out in Appendix 1, Bellway raised concerns over the inclusion of these sites in the 2022 Publication Plan. Noting that these have now been omitted from the 2024 Publication Plan, we</p>	No	No	No	<p>Comments noted.</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			reiterate that land west of Strathmore Crescent is a sustainable and suitable option for development.				
Pegasus Group for St Philips	AGT24-032-07-02	Policy SA3	Details regarding Wombourne and its services can be found in paragraphs 5.1 – 5.3 of the full representation. The site of Bratch Common Road would be able to deliver development in the first five to ten years of the Plan period. Details of the site, including landscape sensitivity, highways and access, sustainability appraisal and remediation can be found in paragraphs 5.5 – 5.10 of the full representation. A vision document is attached to appendix two.	Yes	No	Not stated	<p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>Justification for the council’s spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district’s growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan’s ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council’s Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p>
<b>Coven: Site 082 - Land between A449 Stafford Road and School Lane</b>							
Sport England	STA24-042-03	Policy SA3	Unclear that a replacement playing field is achievable in line with Policy HC18 and NPPF103. This therefore raises doubt about the deliverability of the site.	Yes	No	Yes	<p>Cameron Homes concept plan shows play equipment to be relocated and football pitch to be moved north to allow access to the site.</p> <p>No change proposed.</p>
Evolve Planning & Design for Cameron Homes	AGT24-017-02-09	Policy SA3	<p>Land at School Lane, Coven - this is supported as ‘sound’ by Cameron Homes who have a current interest in this land. Details of the proposed allocation in paragraph 4.4 of the full representation.</p> <p>Cameron Homes considers that the identified yield of 48 dwellings underestimates the likely capacity of the site, having regard to the proposed policies in respect of housing density and mix. The sketch layout attached at Appendix A demonstrates a scheme of approximately 60 dwellings.</p> <p>Land at A449 and School Lane, Coven - details on Sustainability Appraisal, Landscape Sensitivity, impact on the historic environment, impact on flood risk and highways are detailed in paragraphs 12.7 - 12.13 of the full representation. There is an agreement in place between the landowner and Cameron Homes to facilitate development of the site and therefore the site is</p>	Yes	Yes	Yes	<p>Comments and support noted.</p> <p>The yield identified within the site proforma for this proposed allocation is a ‘minimum’ of 48 dwellings. This is based on the assessment of the site and further details provided through the Housing Site Assessment Topic Paper 2024. As such, it is not considered necessary to increase the yield of the site.</p>



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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			deliverable and immediately available.				
National Highways	STA24-032-01	Policy SA3	Land between A449 Stafford Rd & School Lane - potential boundary impacts (landscape, air, noise, drainage, etc.) on A449.	Not stated	Not stated	Not stated	Comments noted.
Phillips, B	RES24-179-01	Policy SA3	<p>This new local plan will still have the same impact as the warehouses as in traffic disruption, school children sitting in more fumes all day, flooding because when we have a lot of rain the water comes down hill no matter how it is drained, also there is a pressurised sewage pipe running through the field to which 7 Trent have said nothing must go near it.</p> <p>Most of Dunston does not have drains and the cottage gardens and some garages over the railway bridge are now starting to flood badly because there are no drains. This will only get worse with more buildings etc.</p> <p>Work being carried out on the brook bridge school lane will not help and a proper drainage/sewage system is needed. The small hamlet of Dunston cannot take anymore buildings or traffic.</p> <p>When the M6 is blocked School lane is used as a rat run, with more traffic coming onto the A449 from buildings on this field it will be mayhem. This field should not be turned into a concrete jungle when it is the best arable field around.</p> <p>It is dangerous trying to exit school lane onto the A449 now without adding more traffic.</p>	Not stated	Not stated	Not stated	<p>Comments noted.</p> <p>Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies. Engagement throughout plan preparation has taken place with Local Highways Authority, School Organisation Team (SOT) (both Staffordshire County Council), and Staffordshire and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical Commissioning Group). None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities, or addressed through proposed Policies HC14, and HC15.</p> <p>The council has undertaken continual engagement with both Severn Trent Water and South Staffs Water throughout the preparation of the Local Plan, this has culminated in the production of a Water Cycle Study 2020 to identify impacts of draft allocations upon water supply, wastewater collection and treatment and water quality. A copy of the site capacity assessment can be found in the Strategic Flood Risk Assessment and Sequential Test Topic Paper 2024 which indicates none of the proposed housing allocations would have a greater than 'medium' impact.</p>
<b>Coven: Omission sites</b>							
Evolve Planning & Design for Bloor Homes	AGT24-017-01-02	Policy SA3	<p>Land at Grange Farm, Coven Bloor Homes is promoting Land at Grange Farm, Coven for residential development. This site is suitable, available and achievable and should be considered if it is determined through the EiP that omission sites are necessary to make the Local Plan sound. A site location plan is included at Appendix 1 and illustrative masterplan and vision document is included at Appendix 2.</p> <p>The site description can be found in paragraphs 4.2 – 4.7 of the full representation – historically used for agriculture and is in the Green Belt.</p>	Not stated	Not stated	Not stated	<p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			Delivery of approximately 189 new homes, 3.5ha of green infrastructure including village greens and green corridors, cemetery extension for St Paul's Church. Full details of the Sustainability Appraisal findings, Sequential Test, Green Belt Harm, Landscape Sensitivity, impact on the Historic Environment, Surface Water Flooding and Highways can be found in paragraphs 4.8 – 4.33 of the full representation. There is an agreement in place between the landowner and Bloor Homes to facilitate the development of the site. Information gathered to date concludes there are no physical or other constraints likely to render the site undeliverable within the proposed plan period. The site is deliverable and immediately available.				opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.  The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).
Marrons Planning for Boningale Homes	AGT24-027-02-01	Policy SA3	Omission Site: Land at Coven Road, Brewwood  The subject site comprises land at Coven Road measuring 2.9ha. The site is located in the Green Belt and lies adjacent to the southeastern edge of built form in Brewwood. An outline planning application has been submitted to South Staffordshire District Council for consideration. The proposed development comprises the following; Up to 45no. residential dwellings; Improved pedestrian connections to the centre of Brewwood; Accessible Car Parking provision to support tourism growth at the Chillington Estate. The site is within flood zone 1 and there are no listed buildings within the site. Brewood is identified by the Council as being a Tier 2 settlement and is a secondary focus of growth for South Staffordshire. The settlement is inherently sustainable and is home to a number of services and facilities. The site is controlled by Boningale Homes who are committed to the development of the site, and as such, the site is considered to be immediately, available, achievable and deliverable and as such, we consider that the Council should seek to allocate the site for development without delay.	Not stated	No	Not stated	Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.  Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.  The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).
<b>Featherstone: Site 397 – Land adjacent to Brookhouse Lane</b>							
Staffordshire County Council LLFA	STA24-044-19	Policy SA3	Ref 397 - Land adjacent to Brookhouse Lane Surface water - extensive and significant surface water flow pathway to the south of the proposed development site.	Not stated	Not stated	Not stated	Comments noted.
First City Ltd for UKPI Ltd	AGT24-018-02-13	Policy SA3	We support the inclusion of site 397 for residential development in Featherstone. We also support policy SA3 stating the housing numbers for each site are the minimum allowing a level of flexibility for an increased number of dwellings should the site	Yes	Yes	Yes	Comments and support noted.

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			allow it.				
<b>Featherstone: Omission sites</b>							
RPS Group for Persimmon Homes	AGT24-036-02-06	Policy SA3	<p>Having reviewed the Housing Site Selection Topic Paper (HSSTP) with respect to the sites assessed at Featherstone, including site 170, RPS disputes the conclusions of the Council's site assessment for site 170.</p> <p>Firstly, it is clear, on the Council's own evidence, that site 170 performs well in terms of Green Belt harm ('moderate') and Landscape sensitivity (low-moderate').</p> <p>Secondly, RPS contends the highways concerns raised by the County Highways Authority (CHA) has been over-stated and result in an unduly negative assessment for the Site. An initial transport strategy prepared by PJA, on behalf of Persimmon Homes, outlines how these concerns can be mitigated in order to facilitate suitable development on the Site. RPS therefore disputes the CHA view further assessments are required at this stage to justify allocating the site on highway capacity grounds. The reasons for excluding the site on highways grounds are therefore not justified.</p> <p>The assessment for site 170 in the HESA (specifically the amber score for indirect impacts on designated heritage assets) is arbitrary in nature and does not represent a robust assessment. The vision document demonstrates that built development would be significantly set back from the edge of the site that would increase the stand off to more that double the Council's estimate.</p> <p>The 'Known constraints' relating to site 170 are not justifiable. RPS does not agree with overall conclusions drawn by the Council in relation to site 170 which has resulted in its exclusion from the SSLP. Whilst some constraints may impact on the Site, none of them preclude residential development on the Site, nor do they prevent the Site from being allocated in the local plan for residential use. RPS does not consider the reasons for excluding the site to be soundly-based.</p>	Yes	No	Not stated	Representation appears to relate to the Council's 2022 Regulation 19 Publication Plan, rather than the 2024 Publication Plan.
Knight Frank for Pland Estates Ltd	AGT24-024-01-01	Policy SA3	<p>The justification for limiting green belt release to Tier 1 settlements is not inherently clear, as the settlement tiers do not directly correlate with the green belt and its five purposes as set out in para 143 NPPF. It is considered that sustainable development is not only achieved at Tier 1 settlements, but can be achieved in sub-Tier 1 settlements, subject to immediate availability of public transport, services and facilities. Policy SA3 should be amended to incorporate the land north of Featherstone which can deliver circa 370 dwellings.</p>	Yes	No	Yes	<p>The Rural Services and Facilities Audit 2021 informs the spatial strategy set out in Policy DS5. It is considered that this takes a balanced approach that will lead to a sustainable pattern of development by focusing growth of the district's most sustainable Tier 1 settlements. The strategic approach does still allow for limited development in lower Tier 4 and 5 settlements, including limited affordable housing.</p> <p>It is considered appropriate to limit development in Tier 5 settlements due to their unsustainable location. It is considered that the policy strikes</p>

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							the correct balance by still allowing limited development including conversion of redundant rural buildings and limited affordable housing to meet local needs. The allowance for very limited redevelopment of PDL for housing where the proposal would not increase sustainable transport movements is considered appropriate.
Savills UK Ltd for Taylor Wimpey	AGT24-037-05-12	Policy SA3	Land at Cross Green was identified in the Preferred Options and 2022 Publication Plan to deliver residential-led growth to meet the unmet need of the GBBCHMA, with the most significant infrastructure benefit being a major new access road from the A449 to ROF Featherstone strategic employment site. ROF Featherstone was first allocated in the 1996 Local Plan and was proposed for re-allocation in the emerging plan, the key constraint was access. SSSDC's removal of the Cross Green allocation makes no reference on the ROF Featherstone access being taken through the site and the potential implications on the delivery of ROF Featherstone. Taylor Wimpey support the re-allocation of ROF Featherstone where the draft allocation on Land at Cross Green is also included to deliver the highways infrastructure and homes to serve the jobs being created.	Not stated	No	No	<p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p>
Savills UK Ltd for Taylor Wimpey	AGT24-037-05-12	Policy SA3	We object to SA3 and consider that insufficient land has been provided to meet the excessively high housing land shortfall in the GBBCHMA and that Land at Cross Green should be included as a strategic development location. Details on exceptional circumstances, including an overview of the Green Belt Review undertaken by EDP can be found in the full representation. A significant amount of technical work has been prepared by Taylor Wimpey throughout the plan process to support the allocation of Cross Green and demonstrate its deliverability – details of this can be found in the full representation.	Not stated	No	No	<p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p>
Savills UK Ltd for Taylor Wimpey	AGT24-037-05-12	Policy SA3	Cross Green The site performs better overall, specifically against the economy and employment objectives, than the proposed	Not stated	No	No	Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing

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			allocation 'Land East of Bilbrook'. Despite this, the justification for removing Cross Green is that "the site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy". Appendix H of the SA states in the outline reasons for selection that "the site is considered to perform better than other site options and failing to consider such areas for development may result in an unsustainable pattern of development". The Council has not justified the removal of the allocation and the implications of its removal on the delivery of key infrastructure.				Site Assessment Topic Paper 2024.  Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.  The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).
Turley Associates for David Wilson Homes	AGT24-042-02-01	Policy SA3	Land South of New Road, Featherstone Concept Development Plan in Appendix 1. The site benefits from a wide range of local services and facilities within Featherstone, including a primary school, children's centre and nursery, convenience stores, doctors' surgery, community hall and leisure facilities. A bus service runs along New Road immediately to the north of the site. The site has potential capacity for 400 new homes which comprises two sites split by Rabbit Lane. David Wilson Homes is of the view that Featherstone should be identified as a Tier 2 settlement, and the growth at this site is in line with other Tier 2 settlements. David Wilson Homes believes that Site 396 continues to be assessed incorrectly in the plan's evidence base. It scores 'major negative' for landscape and townscape despite the Landscape Study (2019) scoring the landscape sensitivity as 'low moderate', and therefore this should score 'minor negative' overall. The site scores 'major negative' for education, however no justification is provided for this when it is acceptable walking distance to Featherstone Academy Primary School, and therefore should score 'minor negative' overall. Site 396's constraints have been overplayed in the Council's evidence and, as such, Site 396 should be a proposed housing allocation in the Plan, or as a minimum, safeguarded land. It is accepted that a draft policy proposing to allocate or safeguard might be subject to a clause that it should not come forward until the link road has been delivered.	Not stated	Not stated	Not stated	Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.  Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.  The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).
<b>Pattingham: Site 251 – Hall End Farm</b>							
PlanIT Planning & Development for	AGT24-032-02-	Policy SA3	Whilst we support the identification of land at Hall End Farm for residential development, The Housing Site Proforma should be	Yes	Yes	Yes	Comments and support noted.



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Hampton Oak Developments	10		<p>amended. The site area should be quoted as 0.7 Hectares and the minimum capacity should be changed from 17 dwellings to c15 dwellings.</p> <p>The site should be enlarged reflecting Pattingham as a sustainable settlement, the site-specific credentials and there being no known constraints to development of the site. If Allocation 251 is not enlarged we invite the council to remove the site from the Green Belt and identify it as safeguarded land.</p>				<p>Minor modification 011: p.65: Minimum Capacity (dwellings) <del>17</del> <b>15</b>.</p> <p>Minor modification 066: p.227: Minimum Capacity (dwellings) <del>17</del> <b>15</b>.</p> <p>Minor modification 067: p.227: Site area <del>0.7</del> <b>0.8</b></p> <p>The Council considers that it would be inappropriate to release additional land from the Green Belt for safeguarded land through this Local Plan, given the need for any such release to be justified by exceptional circumstances.</p> <p>It is acknowledged that the approach to future Green Belt release will be considered through an updated Strategic Growth Study across the GBBCHMA which South Staffordshire will be an active partner in, and it is right to consider this issue strategically across this wider functional geography. To date, no GBBCHMA authority has requested that South Staffordshire provide additional safeguarded land for longer term unmet needs, nor has this been required in recent examinations in the GBBCHMA. Given these factors and the requirement in national policy to review the plan in whole or in part every 5 years, it is not considered appropriate or necessary to release safeguarded land at this stage.</p>
AJ Carter Consulting for Jeavons	AGT24-003-01-02	Policy SA3	<p>A single site at Pattingham (allocation 251) has been identified for green belt release. It is felt that there is a real risk of stymying future affordable housing stock by placing all the focus for residential development in the plan period on one site with a capacity of 17 homes. An approach which would meet the tests of soundness and support the future health of Pattingham would be to allocate a further site and (as a minimum) bring the settlement in line with similar tier 3 locations such as Coven (48 homes) and Featherstone (35 homes). This would more likely ensure the effective delivery of affordable housing required by the Local Plan.</p>	Yes	No	Yes	<p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper,</p>

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							that conformed with the preferred spatial strategy (spatial option I).
<b>Pattingham: Omission sites</b>							
AJ Carter Consulting for Jeavons	AGT24-003-01-02	Policy SA3	<p>Omission Site - Wolverhampton Road, Pattingham</p> <p>The site currently makes a contribution to the countryside through its use as a paddock for equestrian purposes. However, the owners understand how much more the site can contribute to the social fabric of the village through the provision of affordable housing. In an area where the house price to household earnings ratio has risen to 7.35 (ONS Data) it is more critical than ever for a rural district like South Staffordshire to allocate sufficient land for affordable housing over the Plan period.</p> <p>The site is located close to the heart of the village. A short walk from the village centre. The services identified in the preceding section are all within short walking distance of the site, meaning that a reliance on private car ownership is not a central component to a thriving community.</p> <p>To deliver a successful development a new vehicular access would be formed from Wolverhampton Road and the existing pavement would be extended to link the site via sustainable means.</p>	Yes	No	Yes	<p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p>
AJ Carter Consulting for Jeavons	AGT24-003-01-02	Policy SA3	<p>Omission Site - Pattingham</p> <p>In releasing the site from the green belt and including it within the quantum of safeguarded land the Local Authority can define the eastern boundary of the site through the use of the existing dwelling immediately to the east together with the curtilage of that property.</p> <p>The size of the site at 2.1ha means that a range of housing types and tenures can be delivered. A smaller site is likely to be limited to predominantly market housing with a modest offer of affordable homes and shared ownership. The custodians of the site recognise that delivering shared ownership, social rent and affordable rent homes for families (in partnership with a housing association) will support the health and growth of Pattingham without simply focussing on market housing.</p>	Yes	No	Yes	<p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p>
Pland Estates Ltd	AGT24-033-01-	Policy SA3	Promoted site at Land off Moor Lane Pattingham should be allocated representing a natural 'rounding off' of the village.	Yes	No	Yes	Site options have been assessed against a consistent set of planning criteria to determine

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	01		The site would contribute to local housing needs by providing circa 80 additional dwellings in a sustainable development with direct access to public transport and within walking distance of facilities and services.				<p>proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p>
<b>Swindon: Site 313 – Land off Himley Lane</b>							
Swindon Parish Council	STA24-047-01	Policy SA3	<p>Site 313 - Himley Lane</p> <p>The site has never been supported by Swindon Parish Council or Swindon residents. The site is too small to accommodate 10 dwellings.</p> <p>Two recent planning applications on the site have failed (22/01151/PIP withdrawn and 23/00537/OUTM refused) (link to planning statement).</p> <p>Remove site 313 from the Local Plan.</p>	Not stated	No	Not stated	<p>Comments noted.</p> <p>The refusal of planning permission historically does not preclude a site from being proposed for allocation. Like all sites proposed for residential allocation, site 313 has been assessed in the round against a consistent set of planning criteria in order to determine those that better perform as sustainable allocations.</p>
Doorbars	AGT24-015-01-01	Policy SA3	<p>Felt that the previous proposed allocation at site 313, Himley Lane, Swindon was compliant with the previous policy requirement and help deliver affordable housing and a housing mix.</p> <p>Propose modifications to the plan to include site 313 expansion for a minimum of 22 dwelling of a viable site to allow natural growth of the village.</p> <p>The site has existing direct access off Himley Lane including a footpath linked to the wider village.</p>	Yes	No	Yes	<p>Comments noted.</p> <p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p>
Shenton, P	RES24-209-01	Policy SA3	<p>Object in relation to site 313.</p> <p>Do not support site 313 Himley Lane and should be withdrawn from the plan.</p> <p>The site at 0.3ha is too small for the 10 dwellings proposed.</p> <p>Two planning applications at this site have failed.</p>	Not stated	No	Not stated	<p>Comments noted.</p> <p>The refusal of planning permission historically does not preclude a site from being proposed for allocation. Like all sites proposed for residential allocation, site 313 has been assessed in the round against a consistent set of planning criteria in order to determine those that better perform as sustainable allocations.</p>

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Historic England	STA24-023-01	Policy SA3	Site 313 Grade II listed building in the vicinity of the site, are there any opportunities for an enhancement measure to bring the building back into use and provide a positive strategy for the historic environment? We agree that the trees and hedgerows should be retained, though would not consider this as an enhancement measure but rather a required mitigation measure to protect the setting of heritage assets and historic character. Additional planting would be considered as an enhancement measure and we support this.	Not stated	Not stated	Not stated	The impact upon the historic environment has been assessed on a site-by-site basis through the preparation of a Historic Environment Site Assessment (HESA) which has informed the site selection process.  The relevant section of the site proforma states that the retention of hedgerows and trees is considered mitigation rather than enhancement. Additional planting in relation to the proposed site would be subject to and delivered in line with the relevant development plan policies.
Massey, S	RES24-145-02	Policy SA3	Site 313 – land off Himley Lane, Swindon The site has never been supported by Swindon parish council or Swindon residents The site is too small for proposed housing Two previous failed applications Site is not deliverable	Not stated	No	Not stated	Comments noted.  The refusal of planning permission historically does not preclude a site from being proposed for allocation. Like all sites proposed for residential allocation, site 313 has been assessed in the round against a consistent set of planning criteria in order to determine those that better perform as sustainable allocations.
Share, M	RES24-208-01	Policy SA3	Site 313 Land should be returned into the greenbelt similarly to other areas Access lane, Himley Lane, is an 'accident waiting to happen' Lane is far too narrow and dangerous and is common sense to not develop there Two planning proposals have been previously rejected	Not stated	Not stated	Not stated	The Council considers that its approach to Green Belt land is consistent with national planning policy, demonstrating exceptional circumstances in a manner consistent with NPPF requirements. See the Green Belt Exceptional Circumstances Topic Paper 2024 for these.  Engagement throughout plan preparation has taken place with Local Highways Authority (Staffordshire County Council). They have not indicated that [access to the site is problematic or unmitigable] the impact of the proposed allocation would not generate any significant impacts on the transport network or highway safety that cannot be mitigated in line with paragraph 114 d of the NPPF.
<b>Swindon: Omission sites</b>							
Harris Lamb for Heyfield Developments Ltd	AGT24-022-02-01	Policy SA3	Omission site HD are promoting land at Enville Road, Wall Heath for a proposed residential development to accommodate approximately 148 dwellings. The land is within South Staffordshire but adjoins Wall Heath in Dudley on two sides. The site is promoted for release from the Green Belt to meet the housing needs of South Staffordshire or the unmet need of the HMA. Full details of the site at Enville Road can be found in the full	Not stated	No	No	Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.  Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024

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			representation, with a Vision Document which was previously submitted.				and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.  The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).
<b>Wheaton Aston: Site 379 – Land off Ivetsey Road</b>							
Staffordshire County Council LLFA	STA24-044-19	Policy SA3	Ref 379 - Land off Ivetsey Road Surface water - ponding to the East of the proposed development site.	Not stated	Not stated	Not stated	Comments noted.
<b>Wheaton Aston – Omission sites</b>							
Bruton Knowles for owners of land off Primrose Close	AGT24-007-02-02	Policy SA3	We consider that Land off Primrose Close – 094 Wheaton Aston should be included as a strategic development location, given it can provide future housing in a highly sustainable location adjacent to the school. It is an excellent residential opportunity to support the school with reduced traffic movements from adjacent family accommodation. This development will not result in encroachment towards any settlement and the village envelope could be naturally extended to also include the adjacent school. There are no known constraints, and the land is located Flood Zone 1 the lowest risk from flooding; it is not located within a Conservation Area. Finally, there are no other known environmental nor historical designations which affect the Land. The scale of growth identified on the Land is also considered sustainable for a Tier 3 settlement.	Not stated	No	Not stated	Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.  Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.  The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).
Vista Planning Ltd for Hampton Oak Ltd	AGT24-043-01-01	Policy SA3	We assert that the Fenton House Lane site, to the immediate north of Wheaton Aston, which by the council's own evidence is a suitable site within this settlement to deliver growth can assist the council in proving a greater number of homes within the district through a proportionate extension in a non-Green Belt location.  In the Regulation 18 Preferred Options version of the plan, the	No	No	No	Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.  Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in



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			<p>land to the immediate north west of the Site (SHLAA ref 610) was allocated for residential development. Thus, it is reasonable to conclude that there are no technical constraints to its delivery. The same conclusions can be drawn in respect of the Fenton House Lane site.</p> <p>The Housing Site Selection Topic Paper 2024 finds no show stopping constraints, recognising that there is moderate to high landscape sensitivity but that is no different to the majority of land in this broad location. Ultimately, the site fails to secure an allocation because Wheaton Aston as a Tier 3 settlement has not been identified (in this revised version of the plan) for any housing growth beyond the existing commitments and allocations.</p>				<p>our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p>
Evolve Planning & Design for Keon Homes	AGT24-017-04-01	Policy SA3	<p>Land at Bridge Farm – site 426a is complete, the land to the rear beyond the existing settlement boundary (426b) is available for development. To meet locally derived housing need arising in the village within the plan period, there is justification for identifying a further housing allocation to support growth in the non-Green Belt settlement of Wheaton Aston. Site 426b is suitable, available and achievable and should be considered if omission sites are necessary to make the Local Plan sound. Land at Bridge Farm - details on Sustainability Appraisal, Sequential Test, Landscape Sensitivity, impact on the historic environment, impact on flood risk and highways are detailed in paragraphs 12.5 - 12.15 of the full representation. There is an agreement in place between the landowner and Keon Homes to facilitate the development of the site, as such the site is available now.</p>	Yes	No	Yes	<p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p>
<b>South of Stafford: Site 036c – Land at Weeping Cross</b>							
Parrott, S	RES24-168-01	Policy SA3	<p>Object to site 036c being in the local plan for residential development. The area is very productive grade 3a farmland,</p> <p>The land is part of historic parkland within what was the part of the Lichfield Estate and whilst in agricultural production provides a haven for wildlife with its many mature trees including; brown hare, deer, barn owls, tawny owls and bats are often seen on the site. The site also forms part of a wildlife corridor from Cannock Chase AONB towards the Hazelstrine wood and down onto the meadows on Acton Hill Farm.</p>	No	No	No	<p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district's agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that</p>

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			<p>The justification for the proposal appears to be principally that the site is not in the Green Belt. It is not, however, justified by housing needs. Stafford Borough can meet its own housing requirement and South Staffordshire Council has acknowledged the lack of unmet housing need in Stafford and that Stafford Borough is in a separate HMA.</p> <p>The proposal does not assist in meeting the needs of South Staffordshire residents. These are being met elsewhere in the District by the other allocations, including on non- green belt sites, and which are focused on the district's most sustainable larger settlements.</p> <p>The site and adjoining land has been identified as being of high landscape sensitivity. The reduction in the extent of the proposal from that previously put forward does not negate that finding and major negative impacts are anticipated. The proposal will be visually obtrusive from local views (in particular from both the A34 and Wildwood Drive) and also from the AONB to the east and southeast. Moreover, there would be no clear or defensible southern boundary to the development as an arbitrary line across the field with no physical features.</p> <p>The AONB is recognised as a highly sensitive area where visitor management is critical, with already planned increasing housing development in the wider vicinity. Recreational use is predicted to increase. There is a need to meet recreation demand while ensuring that the issues associated with high levels of recreation do not cause long-term damage or lessen the experience for other users. Identifying a new housing site so close to the AONB is at odds with the need for its conservation.</p> <p>Local residents have significant concerns regarding the ability of schools and health facilities to cater for the increased demand that will result from the housing proposal. The increase in traffic and resulting air pollution is also a local concern. These concerns do not appear to have been fully considered when the site was allocated.</p>				<p>are better performing as sustainable allocations.</p> <p>Site 036c was identified in the Historic Environment Site Assessment (HESA) as 'amber' for predicted impact on the historic environment meaning that there are no significant effects that cannot be mitigated. Nevertheless, only the northern portion of the wider site parcel has been proposed for allocation as recommended in the HESA. The council considers that these site-specific issues will prevent any future development to the south of the proposed allocation.</p> <p>The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact on habitats sites.</p> <p>The justification for proposing site 036c is set out in the Housing Site Assessment Topic Paper 2024. The council has sought to maximise the development opportunities on sites outside of the Green Belt in the first instance, this includes site 036c located within Open Countryside, before identifying Green Belt sites. This approach is in conformity with paragraphs 146 and 147 of the NPPF. Crucially, the site is a sustainable non-Green Belt opportunity that will contribute to the district's housing requirement, and which national policy requires consideration prior to considering green belt release. Taking all the different considerations together, site 036c has been identified as suitable to contribute to meeting South Staffordshire's housing requirement.</p> <p>Landscape sensitivity has been assessed through the Landscape Sensitivity Study. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that better perform as sustainable allocations. Any future planning application would be expected to address Policy NB4 – which the council has included as a proposed policy in the plan –</p>

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							<p>insofar as the design and location of new development should take account of the characteristics and sensitivity of the landscape and its surroundings, including not having a detrimental impact upon any medium or long-distance views.</p> <p>Any future planning application would be expected to address Policy NB4 insofar as they must conserve and enhance the landscape and scenic beauty of the area and conform with the most up to date SPDs.</p> <p>Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies. Engagement throughout plan preparation has taken place with Local Highways Authority, School Organisation Team (SOT) (both Staffordshire County Council), and Staffordshire and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical Commissioning Group). None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities, or addressed through proposed Policies HC14, and HC15.</p> <p>No change proposed.</p>
Parrott, J	RES24-167-01	Policy SA3	<p>Object to site 036c being in the local plan for residential development. The area is very productive grade 3a farmland,</p> <p>The land is part of historic parkland within what was the part of the Lichfield Estate and whilst in agricultural production provides a haven for wildlife with its many mature trees including; brown hare, deer, barn owls, tawny owls and bats are often seen on the site. The site also forms part of a wildlife corridor from Cannock Chase AONB towards the Hazelstrine wood and down onto the meadows on Acton Hill Farm.</p> <p>The justification for the proposal appears to be principally that the site is not in the Green Belt. It is not, however, justified by housing needs. Stafford Borough can meet its own housing requirement and South Staffordshire Council has acknowledged the lack of unmet housing need in Stafford and that Stafford Borough is in a separate HMA.</p> <p>The proposal does not assist in meeting the needs of South Staffordshire residents. These are being met elsewhere in the</p>	No	No	No	<p>Response as above.</p> <p>No change proposed.</p>

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			<p>District by the other allocations, including on non- green belt sites, and which are focused on the district’s most sustainable larger settlements.</p> <p>The site and adjoining land has been identified as being of high landscape sensitivity. The reduction in the extent of the proposal from that previously put forward does not negate that finding and major negative impacts are anticipated. The proposal will be visually obtrusive from local views (in particular from both the A34 and Wildwood Drive) and also from the AONB to the east and southeast. Moreover, there would be no clear or defensible southern boundary to the development as an arbitrary line across the field with no physical features.</p> <p>The AONB is recognised as a highly sensitive area where visitor management is critical, with already planned increasing housing development in the wider vicinity. Recreational use is predicted to increase. There is a need to meet recreation demand while ensuring that the issues associated with high levels of recreation do not cause long-term damage or lessen the experience for other users. Identifying a new housing site so close to the AONB is at odds with the need for its conservation.</p> <p>Local residents have significant concerns regarding the ability of schools and health facilities to cater for the increased demand that will result from the housing proposal. The increase in traffic and resulting air pollution is also a local concern. These concerns do not appear to have been fully considered when the site was allocated.</p>				
Glennon, D	RES24-084-01	Policy SA3	<p>In respect of site 036c, the Plan is unsound and may not be legally compliant. It has evidently not been the subject of effective ‘duty to co-operate’ liaison with Stafford Borough Council (SBC). The use of site 036c fails the NPPF December 2023 with regards to conserving and enhancing the natural environment. Compliance with the NPPF is a legal obligation.</p> <p>The land is productive farmland, classified by SSDC consultant SA Report October 2022 as Grade 3, but transitioning to Grade 2 towards the village of Acton Trussell. It is understood from the Tenant Farmer that the land is very productive.</p> <p>It is classical rolling countryside providing an excellent vista from both the large Wildwood (Stafford) development and the A34 SE of Stafford.</p> <p>The site is noted for its diversity of wildlife. 34 species of birds are seen on a regular basis, together with deer, badgers, bats</p>	No	No	No	<p>Any oversupply that may have been delivered by Stafford is not a relevant consideration when preparing the plan for South Staffordshire as it is a different HMA. Stafford Borough Council and SSDC also have an agreed SoCG that addresses Duty to Cooperate matters.</p> <p>The council considers that all proposed allocations comply with the NPPF and the spatial strategy (identified in Policy DS5) insofar as they are located to deliver sustainable patterns of development that meet the authorities’ identified housing need.</p> <p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district’s agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and</p>

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			<p>and hares. It is an important wildlife and biodiversity link between the Cannock Chase AONB and the Staffs and Worcester Canal and the River Penk valley to the west. Connectivity is established as important in the Staffordshire Wildlife Trust Biodiversity Report; it appears to have been ignored in the Plan.</p> <p>The expressed reason for the use of this land within the Plan is that it is not Green Belt. This might be justified if the 81 houses were either necessary to meet overall SSDC housing demand or local demand. Paragraph 5.28 of the Plan notes there is no local 'unmet housing need'.</p> <p>Any argument that 036c least damaging to the natural environment is flawed because:</p> <ul style="list-style-type: none"> <li>- SSDC's consultants rated the site as a Major Positive in respect of Education. This does not take into account that local schools are confirmed as full. If the incorrect assessment in respect of Education were to be removed, the consultant's assessment would be expected to be reversed.</li> <li>- The land is within the SAC of the Cannock Chase AONB. This conflicts with the SDC SAC Cannock Chase Special Area Of Conservation (SAC) Guidance To Mitigate The Impact Of New Residential Development (March 2022) Policy EQ2. Site 036c is an important part of the continuity of Open Countryside between Cannock Chase AONB and the important Valley of the River Penk. Mitigation, as permitted in the SAC, will be unable to mitigate the impact on wildlife movements between these important sites South of Stafford.</li> <li>- Any suggestions that the damage to environment can be mitigated by 'diversity of domestic gardens' or financial mitigation to Cannock Chase AONB are derisory.</li> <li>- Of all the sites assessed by the SSDC HRA consultants supporting the Publication Plan, Appendix 4, sites 016 (Pear Tree Farm, Huntington, a Tier 2 Settlement) and site 036c are the closest sites to Cannock Chase AONB, at 2.0km and 2.1km respectively.</li> <li>- The choice of site 036c is unsound in terms of localised housing need. It is intimately linked to the southern boundary of SBC. SBC has provided significantly more housing than their minimum requirements. There are significant extant and planned housing developments in the south of Stafford which, whilst providing significant housing availability have also provided excessive demands on local schools and health provisions which SSDC have assumed will provide services.</li> <li>- Dispute the number of homes proposed in the plan. Houses would be more effectively placed a greater distance from Stafford. It is suggested that sites not constrained by Green Belt constraints, such as Cheslyn Hay/Great Wyrley, Codsall/Bilbrook, or even more appropriately, sites further south closer to the</li> </ul>				<p>therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p> <p>Landscape sensitivity has been assessed through the Landscape Sensitivity Study. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better perform as sustainable allocations. Any future planning application would be expected to address Policy NB4 – which the council has included as a proposed policy in the plan – insofar as the design and location of new development should take account of the characteristics and sensitivity of the landscape and its surroundings including not having a detrimental impact upon any medium or long-distance views.</p> <p>The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to – identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact on habitats sites.</p> <p>The council has sought to maximise the development opportunities on sites outside of the Green Belt in the first instance, this includes site 036c located within Open Countryside, before identifying Green Belt sites. This approach is in conformity with paragraphs 146 and 147 of the NPPF.</p> <p>Engagement throughout plan preparation has taken place with the School Organisation Team (SOT) at Staffordshire County Council. They have not indicated that the impact of the proposed allocation is incapable of being mitigated through financial contributions in line with Policy HC15.</p> <p>Development in locations to the northeast of the</p>



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			<p>West Midlands, could logically be reconsidered to be enlarged to deliver the 81 dwellings.</p> <p>- Questions whether the 4.4 hectares considered suitable for development in the SSDC Brownfield Land Register could be used as a suitable alternative to site 036c.</p> <p>SSDC do not demonstrate that they have effectively exercise their Duty to Cooperate with SBC in that they have not acknowledged or taken account of the housing allocation that SBC have declared in their extant Plan for Stafford Borough 2011-2031. No allowance appears to have been made with regards to SBC oversupply.</p> <p>Site 036c is unnecessary and surplus to reasonable requirements and should be removed from the plan.</p>				<p>district towards Cannock Chase National Landscape, have the potential to have a negative effect on the character and/or setting of the National Landscape. Any future planning application would be expected to address Policy NB4 insofar as they must conserve and enhance the landscape and scenic beauty of the area and conform with the most up to date SPDs. Any specific developer contributions that are required to mitigate any adverse impacts of development on Cannock Chase SAC will be secured at the point of a planning application approval. The council considers that the mechanism to secure such a financial contribution is through Policy NB3 is satisfactory.</p> <p>The justification for proposing site 036c is set out in the Housing Site Assessment Topic Paper 2024. Crucially, the site is a sustainable non-Green Belt opportunity that national policy requires us to considered prior to considering green belt release. Taking all the different considerations together, site 036c has been identified as suitable to contribute to meeting South Staffordshire’s housing requirement.</p> <p>The Council’s Brownfield Land Register is kept in line with the appropriate legislation; The Town and Country Planning (Brownfield Land Register) Regulations 2017. It is not designed to form part of the site selection process, although sites included within it which do not have planning permission are included within the Council’s Strategic Housing and Economic Land Availability Assessment (SHELAA) which does form part of the site selection evidence base to the plan.</p> <p>No change proposed.</p>
Dapaah, S	RES24-050-01	Policy SA3	<p>In respect of site 036c, the Plan is unsound and may not be legally compliant. It has evidently not been the subject of effective ‘duty to co-operate’ liaison with Stafford Borough Council (SBC).</p> <p>The use of site 036c fails the NPPF December 2023 with regards to conserving and enhancing the natural environment. Compliance with the NPPF is a legal obligation.</p> <p>The land is productive farmland, classified by SSDC consultant SA Report October 2022 as Grade 3, but transitioning to Grade 2</p>	No	No	No	<p>Any oversupply that may have been delivered by Stafford is not a relevant consideration when preparing the plan for South Staffordshire as it is a different HMA. Stafford Borough Council and SSDC also have an agreed SoCG that addresses Duty to Cooperate matters.</p> <p>The council considers that all proposed allocations comply with the NPPF and the spatial strategy (identified in Policy DS5) insofar as they are located to deliver sustainable patterns of</p>

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			<p>towards the village of Acton Trussell. It is understood from the Tenant Farmer that the land is very productive.</p> <p>It is classical rolling countryside providing an excellent vista from both the large Wildwood (Stafford) development and the A34 SE of Stafford.</p> <p>The site is noted for its diversity of wildlife. 34 species of birds are seen on a regular basis, together with deer, badgers, bats and hares. It is an important wildlife and biodiversity link between the Cannock Chase AONB and the Staffs and Worcester Canal and the River Penk valley to the west. Connectivity is established as important in the Staffordshire Wildlife Trust Biodiversity Report; it appears to have been ignored in the Plan.</p> <p>The overall development strategy is incorrect and overprovides for housing.</p> <p>Design standards and housing mix requirements have not been addressed.</p> <p>Heritage assets have not been addressed. The property and adjacent farm are part of the historic Earls of Lichfield Land as the home of the land manager/bailiff.</p> <p>There are no sustainable travel requirements in SSDC and those in SBC are severely overloaded.</p> <p>Recreational assets requirements not met.</p> <p>The expressed reason for the use of this land within the Plan is that it is not Green Belt. This might be justified if the 81 houses were either necessary to meet overall SSDC housing demand or local demand. Paragraph 5.28 of the Plan notes there is no local 'unmet housing need'.</p> <p>Any argument that 036c least damaging to the natural environment is flawed because:</p> <ul style="list-style-type: none"> <li>- SSDC's consultants rated the site as a Major Positive in respect of Education. This does not take into account that local schools are confirmed as full. If the incorrect assessment in respect of Education were to be removed, the consultant's assessment would be expected to be reversed.</li> <li>- The land is within the SAC of the Cannock Chase AONB. This conflicts with the SDC SAC Cannock Chase Special Area Of Conservation (SAC) Guidance To Mitigate The Impact Of New Residential Development (March 2022) Policy EQ2. Site 036c is an important part of the continuity of Open Countryside between Cannock Chase AONB and the important Valley of the River</li> </ul>				<p>development that meet the authorities' identified housing need.</p> <p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district's agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p> <p>Landscape sensitivity has been assessed through the Landscape Sensitivity Study. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that better perform as sustainable allocations. Any future planning application would be expected to address Policy NB4 – which the council has included as a proposed policy in the plan – insofar as the design and location of new development should take account of the characteristics and sensitivity of the landscape and its surroundings, including not having a detrimental impact upon any medium or long-distance views.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth. The housing target (incorporating the 640-home contribution) is the output of the capacity of the suitable housing sites, determined through the Council's Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).</p> <p>All site-specific design considerations will be</p>

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			<p>Penk. Mitigation, as permitted in the SAC, will be unable to mitigate the impact on wildlife movements between these important sites South of Stafford.</p> <ul style="list-style-type: none"> <li>- Any suggestions that the damage to environment can be mitigated by 'diversity of domestic gardens' or financial mitigation to Cannock Chase AONB are derisory.</li> <li>- Of all the sites assessed by the SSDC HRA consultants supporting the Publication Plan, Appendix 4, sites 016 (Pear Tree Farm, Huntington, a Tier 2 Settlement) and site 036c are the closest sites to Cannock Chase AONB, at 2.0km and 2.1km respectively.</li> <li>- The choice of site 036c is unsound in terms of localised housing need. It is intimately linked to the southern boundary of SBC. SBC has provided significantly more housing than their minimum requirements. There are significant extant and planned housing developments in the south of Stafford which, whilst providing significant housing availability have also provided excessive demands on local schools and health provisions which SSDC have assumed will provide services.</li> <li>- Dispute the number of homes proposed in the plan. Houses would be more effectively placed a greater distance from Stafford. It is suggested that sites not constrained by Green Belt constraints, such as Cheslyn Hay/Great Wyrley, Codsall/Bilbrook, or even more appropriately, sites further south closer to the West Midlands, could logically be reconsidered to be enlarged to deliver the 81 dwellings.</li> <li>- Questions whether the 4.4 hectares considered suitable for development in the SSDC Brownfield Land Register could be used as a suitable alternative to site 036c.</li> </ul> <p>SSDC do not demonstrate that they have effectively exercise their Duty to Cooperate with SBC in that they have not acknowledged or taken account of the housing allocation that SBC have declared in their extant Plan for Stafford Borough 2011-2031. No allowance appears to have been made with regards to SBC oversupply.</p> <p>Site 036c is unnecessary and surplus to reasonable requirements and should be removed from the plan.</p>				<p>assessed in detail at the point of determining any future planning application. At this time, the council considers Policy HC10 (Design Requirements) sufficient to ensure all development meets appropriate requirements and delivers high quality design features which suit their respective contexts.</p> <p>All site-specific design considerations will be assessed in detail at the point of determining any future planning application. At this time, the council considers Policy HC10 (Design Requirements) sufficient to ensure all development meets appropriate requirements and delivers high quality design features which suit their respective contexts.</p> <p>The council has included a sustainable transport policy (Policy EC12) that is considered to sufficient to address sustainable transport matters on a scheme-by-scheme basis. It will ensure that all development (including proposed allocations) maximise opportunities for walking, cycling, and public transport usage, and deliver expanded provision to meet increased cumulative demand for bus and rail services and connections.</p> <p>A range of evidence pertaining to open space, sport, and recreation has been produced to inform the preparation of the local plan both in regard to draft policies (specifically HC17 Open Space, and HC18 Sports Facilities and Playing Pitches) and proposed site allocations. In short, recreation facilities/infrastructure has a minimal evidenced shortfall which nevertheless can be rectified through improved quality and access to existing provision. AS such, the council considers policies HC17 and HC18 satisfactory in securing an appropriate level of future multi-functional, publicly accessible, open space, and protecting existing sports facilities and playing pitches.</p> <p>The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to – identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon</p>

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							<p>their impact on habitats sites.</p> <p>The council has sought to maximise the development opportunities on sites outside of the Green Belt in the first instance, this includes site 036c located within Open Countryside, before identifying Green Belt sites. This approach is in conformity with paragraphs 146 and 147 of the NPPF.</p> <p>Engagement throughout plan preparation has taken place with the School Organisation Team (SOT) at Staffordshire County Council. They have not indicated that the impact of the proposed allocation is incapable of being mitigated through financial contributions in line with Policy HC15.</p> <p>Development in locations to the northeast of the district towards Cannock Chase National Landscape, have the potential to have a negative effect on the character and/or setting of the National Landscape. Any future planning application would be expected to address Policy NB4 insofar as they must conserve and enhance the landscape and scenic beauty of the area and conform with the most up to date SPDs. Any specific developer contributions that are required to mitigate any adverse impacts of development on Cannock Chase SAC will be secured at the point of a planning application approval. The council considers that the mechanism to secure such a financial contribution is through Policy NB3 is satisfactory.</p> <p>Engagement throughout plan preparation has taken place with Staffordshire and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical Commissioning Group). They have not indicated that the impact of the proposed allocation is incapable of being mitigated through financial contributions in line with Policy HC14.</p> <p>The justification for proposing site 036c is set out in the Housing Site Assessment Topic Paper 2024. Crucially, the site is a sustainable non-Green Belt opportunity that national policy requires us to considered prior to considering</p>

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							<p>green belt release. Taking all the different considerations together, site 036c has been identified as suitable to contribute to meeting South Staffordshire’s housing requirement.</p> <p>The Council’s Brownfield Land Register is kept in line with the appropriate legislation; The Town and Country Planning (Brownfield Land Register) Regulations 2017. It is not designed to form part of the site selection process, although sites included within it which do not have planning permission are included within the Council’s Strategic Housing and Economic Land Availability Assessment (SHELAA) which does form part of the site selection evidence base to the plan.</p> <p>No change proposed.</p>
Bates, L	RES24-011-01	Policy SA3	Object. Encroachment into countryside, negative impacts on intrinsic character and beauty of the area. Loss of good quality agricultural land. Too much growth in north of district. Negative impacts on schools, primary medical services, local roads and wildlife.	No	No	No	<p>The council has sought to maximise the development opportunities on sites outside of the Green Belt in the first instance, this includes site 036c located within Open Countryside, before identifying Green Belt sites. This approach is in conformity with paragraphs 146 and 147 of the NPPF. Furthermore, the council considers that all proposed allocations comply with the NPPF and the spatial strategy (identified in Policy DS5) insofar as they are located to deliver sustainable patterns of development that are distributed across the district on strategic planning matters.</p> <p>The site is not considered to impact upon the setting or character of Acton Trussell or other settlements as set out in the Housing Site Selection Topic Paper 2022.</p> <p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district’s agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p> <p>Implications for local services and infrastructure</p>



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							<p>have been assessed alongside the relevant responsible bodies. Engagement throughout plan preparation has taken place with Local Highways Authority, School Organisation Team (SOT) (both Staffordshire County Council), and Staffordshire and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical Commissioning Group). None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities, or addressed through proposed Policies HC14, and HC15. In addition, a Habitats Regulations Assessment (HRA) has screened the plan to identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact.</p> <p>No change proposed.</p>
Stanley, C	RES24-221-01	Policy SA3	<p>The infrastructure of Stafford would be very adversely affected by this development right on the edge of Stafford's boundary. Schools, doctors surgeries etc would all become oversubscribed not to mention the traffic. The commute into Stafford is already a problem and 81 houses will bring extra vehicles, and if a further 2000 are built in the future the roads will be permanently clogged.</p> <p>This is good farmland which it would be a great loss to lose. Please register objection to this plan.</p>	Not stated	Not stated	Not stated	<p>Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies. Engagement throughout plan preparation has taken place with Local Highways Authority, School Organisation Team (SOT) (both Staffordshire County Council), and Staffordshire and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical Commissioning Group). None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities, or addressed through proposed Policies HC14, and HC15. In addition, a Habitats Regulations Assessment (HRA) has screened the plan to identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact</p> <p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district's agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of</p>

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							PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.
Bland, P	RES24-018-02	Policy SA3	Site is outside other south Staffordshire settlements, how will council services be provided. Site is by a busy lane which provides a through route to M6. Too much traffic and is hazardous. Site is subject to ground water flooding.	No	No	Yes	<p>The site allocation is located adjacent to Stafford town and is not an isolated rural settlement. The delivery of council services is not expected to be problematic with Acton Trussell and Acton Gate located nearby.</p> <p>Engagement throughout plan preparation has taken place with Local Highways Authority (Staffordshire County Council). They have not indicated that the impact of the proposed allocation would not generate any significant impacts on the transport network or highway safety that cannot be mitigated in line with paragraph 114 d of the NPPF.</p> <p>All proposed allocations have been screened by the council against fluvial flood zones to determine unsuitable sites within flood zone 3. Remaining sites have been assessed by the Lead Local Flood Authority (LLFA) to determine sites which presented unmitigable flood risk(s). A level 2 Strategic Flood Risk Assessment (SFRA) was also commissioned to address Environment Agency concerns pertaining to 8 sites, which site 036c was not one. This process is set out in more detail in the Strategic Flood Risk Assessment and Sequential Test Topic Paper 2024.</p> <p>No change proposed.</p>
Genway, I	RES24-080-02	Policy SA3	<p>Use of the site fails the national planning policy framework (section 15) conserving and enhancing the natural environment. Compliance with NPP is a legal obligation. The Land is productive farmland grade 3 but grade 2 near Acton Trussell. Rolling countryside.</p> <p>Legally compliant - noted for various wildlife 34 species of birds, Deer, Bats, Hares. This has been ignored in the plan in respect of site 036c. Not complaint with policy DS3 as site 036c meets none of these objectives.</p> <p>Sound - Local schools deemed full, no capacity, therefore education has been assessed incorrectly. Policy HC15 rated the site as positive. This is incorrect.</p> <p>Duty to co-operate - South Staffs Council have not co-operated with Stafford BC which is their duty regarding the above points</p>	No	No	No	<p>The council considers that all proposed allocations comply with the NPPF and the spatial strategy (identified in Policy DS5) insofar as they are located to deliver sustainable patterns of development that [are distributed across the district on strategic planning matters] and meet the authorities' identified housing need.</p> <p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district's agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural</p>

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			for suitable alternatives. Such as a Brownfield Register which contains hectares for development.				<p>land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p> <p>The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact on habitats sites.</p> <p>Allocation of the site will remove it from designation as Open Countryside and therefore Policy DS3 would not apply. Once removed from the open countryside, there will not be a requirement to conform to Policy DS3 but rather the relevant DM policies that are applicable.</p> <p>Engagement throughout plan preparation has taken place with the School Organisation Team (SOT) at Staffordshire County Council. They have not indicated that the impact of the proposed allocation is incapable of being mitigated through financial contributions in line with Policy HC15.</p> <p>Stafford Borough Council and SSDC have an agreed SoCG that addresses Duty to Cooperate matters effectively that both parties consider to be sound and lawful as set out in the Duty to Cooperate Topic Paper 2024.</p> <p>As set out in the Housing Site Selection Topic Paper 2022, there is very limited available brownfield land located within the district, and not enough to meet the district's housing requirement in full. Where brownfield site opportunities are available, these have been included within the Local Plan.</p> <p>No change proposed.</p>
Birds, K	RES24-013-01	Policy SA3	Object to site south of Stafford. Site poorly related to settlements in south Staffordshire. Site will place pressure on service provision in Stafford notably roads, schools and health care. Site is high quality agricultural land. Loss of habitats.	Not stated	Not stated	Not stated	<p>The site allocation is located adjacent to Stafford town and is not an isolated rural settlement.</p> <p>Implications for local services and infrastructure have been assessed alongside the relevant</p>

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							<p>responsible bodies. Engagement throughout plan preparation has taken place with Local Highways Authority, School Organisation Team (SOT) (both Staffordshire County Council), and Staffordshire and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical Commissioning Group). None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities, or addressed through proposed Policies HC14, and HC15.</p> <p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district's agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p> <p>The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact on habitats sites.</p> <p>No change proposed.</p>
Preece, A	RES24-186-01	Policy SA3	<p>Unsound may not be legally compliant. not effective duty to co-operate. The use of the site fails the National Planning Policy Framework 19/12/2023 section 15 conserving and enhancing the natural environment compliance with NPPF is a legal obligation.</p> <ol style="list-style-type: none"> <li>1. The gateway to Stafford is enhanced by the beauty of the farmland on site.</li> <li>2. Land is home to Red Deer, Badgers, Bats, Birds of many species.</li> <li>3. Schools in the area are full to capacity so extra provision would need to be made available to transport children to other schools which will cause more air pollution and traffic jams into town.</li> </ol>	No	No	No	<p>The council considers that all proposed allocations comply with the NPPF and the spatial strategy (identified in Policy DS5) insofar as they are located to deliver sustainable patterns of development that meet the authorities' identified housing need.</p> <p>Stafford Borough Council and SSDC have an agreed SoCG that addresses Duty to Cooperate matters effectively that both parties consider to be sound and lawful as set out in the Duty to Cooperate Topic Paper 2024.</p> <p>Best and Most Versatile agricultural land has</p>

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			Stafford BC have already met all their obligations to provide more homes. surely land to the North of Penkridge would be more suitable.				<p>been considered through the Sustainability Appraisal. The majority of the district's agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p> <p>The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact on habitats sites.</p> <p>Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies. Engagement throughout plan preparation has taken place with Local Highways Authority, and School Organisation Team (SOT) (both Staffordshire County Council). Neither of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities or addressed through proposed Policy HC15.</p> <p>Any oversupply that may have been delivered by Stafford is not a relevant consideration when preparing the plan for South Staffordshire as it is a different HMA.</p> <p>No change proposed.</p>
Preece, J	RES24-187-01	Policy SA3	<p>Unsound May not be legally compliant. not effective duty to co-operate. The use of the site fails the National Planning Policy Framework 19/12/2023, compliance with NPPF is a legal obligation.</p> <ol style="list-style-type: none"> <li>1. The gateway to Stafford is enhanced by the beauty of the farmland on site 036c.</li> <li>2. Land is home to Red Deer, Badgers, Bats, Birds of many species.</li> <li>3. Flooding has occurred on A34 on many occasions, building will only exacerbate this problem and traffic is already a problem especially peak times.</li> </ol>	No	No	No	<p>The council considers that all proposed allocations comply with the NPPF and the spatial strategy (identified in Policy DS5) insofar as they are located to deliver sustainable patterns of development that meet the authorities' identified housing need.</p> <p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district's agricultural land is classified as potential BMV,</p>



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							<p>classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p> <p>The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact on habitats sites.</p> <p>All proposed allocations have been screened by the council against fluvial flood zones to determine unsuitable sites within flood zone 3. Remaining sites have been assessed by the Lead Local Flood Authority (LLFA) to determine sites which presented unmitigable flood risk(s). A level 2 Strategic Flood Risk Assessment (SFRA) was also commissioned to address Environment Agency concerns pertaining to 8 sites, which site 036c was not one. This process is set out in more detail in the Strategic Flood Risk Assessment and Sequential Test Topic Paper 2024.</p> <p>Engagement throughout plan preparation has taken place with Local Highways Authority (Staffordshire County Council). They have not indicated that the impact of the proposed allocation would not generate any significant impacts on the transport network or highway safety that cannot be mitigated in line with paragraph 114 d of the NPPF.</p> <p>No change proposed.</p>
George, S	RES24-081-01	Policy SA3	Page 13 of local plan states the site will rely on the neighbouring area, which will be Stafford BC not S.Staffs. Stafford roads, schools, doctor surgeries etc are all already overwhelmed and cannot cope with the burden of more people locally. Page 134 of the plan, Policy NB1 - this development will not protect enhance or expand natural assets but will have a negative impact on Cannock Chase AONB e.g. on the deer which currently use the site.	No	No	No	Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies. Engagement throughout plan preparation has taken place with Local Highways Authority, School Organisation Team (SOT) (both Staffordshire County Council), and Staffordshire and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical Commissioning Group). None of which have

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							<p>indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities, or addressed through proposed Policies HC14, and HC15.</p> <p>Development in locations to the northeast of the district towards Cannock Chase National Landscape, have the potential to have a negative effect on the character and/or setting of the National Landscape. Any future planning application would be expected to address Policy NB4 insofar as they must conserve and enhance the landscape and scenic beauty of the area and habitats sites and conform with the most up to date SPDs.</p> <p>No change proposed.</p>
Knight, J.E	RES24-132-01	Policy SA3	Object to site south of Stafford. Site is good quality agricultural land; lack of community facilities to support development; local roads at capacity and access is unsuitable.	Not stated	Not stated	Not stated	<p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district's agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p> <p>The site allocation is not an isolated rural settlement, as it is located adjacent to Stafford town where community facilities and other services and infrastructure are available.</p> <p>Engagement throughout plan preparation has taken place with Local Highways Authority (Staffordshire County Council). They have not indicated that access to the site is problematic or unmitigable, and the impact of the proposed allocation would not generate any significant impacts on the transport network or highway safety that cannot be mitigated in line with paragraph 114 d of the NPPF.</p> <p>No change proposed.</p>
Preece, S	RES24-	Policy	Unsound May not be legally compliant. not effective duty to co-	No	No	No	The council considers that all proposed

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	188-01	SA3	<p>operate. The use of the site fails the National Planning Policy Framework 19/12/2023 compliance with NPPF is a legal obligation.</p> <ol style="list-style-type: none"> <li>1. The gateway to Stafford is enhanced by the beauty of the farmland on site 036c.</li> <li>2. The natural beauty of the farmland is also a continuation to the boundary of Cannock Chase as area of outstanding beauty. The wildlife present is of many varied species i.e Deer, Bats, Badgers, Birds (34 species) cattle and insect population such as bees.</li> <li>4. Traffic along A34 is becoming more at a standstill especially at peak times</li> </ol> <p>Land north of Penkridge is more suitable for many reasons.</p>				<p>allocations comply with the NPPF and the spatial strategy (identified in Policy DS5) insofar as they are located to deliver sustainable patterns of development that meet the authorities' identified housing need.</p> <p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district's agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p> <p>The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact on habitats sites.</p> <p>All proposed allocations have been screened by the council against fluvial flood zones to determine unsuitable sites within flood zone 3. Remaining sites have been assessed by the Lead Local Flood Authority (LLFA) to determine sites which presented unmitigable flood risk(s). A level 2 Strategic Flood Risk Assessment (SFRA) was also commissioned to address Environment Agency concerns pertaining to 8 sites, which site 036c was not one. This process is set out in more detail in the Strategic Flood Risk Assessment and Sequential Test Topic Paper 2024.</p> <p>Engagement throughout plan preparation has taken place with Local Highways Authority (Staffordshire County Council). They have not indicated that the impact of the proposed allocation would not generate any significant impacts on the transport network or highway safety that cannot be mitigated in line with paragraph 114 d of the NPPF.</p>

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							Land north of Penkridge has been identified as a draft residential allocation through Policy SA2.  No change proposed.
Berkswich Parish Council	STA24-003-01	Policy SA3	Object to site south of Stafford. Site is isolated from the areas of need in South Staffordshire and there is no need for overspill to meet needs for Stafford Borough. Inadequately justified and would negatively impact on views from Cannock Chase National Landscape Area. Site would be dependent on using over-stretched service facilities situated within Stafford town. Not a logical rounding off, not consistent with NPPF, fails to deliver sustainable development.	Not stated	No	Not stated	<p>The site allocation is located adjacent to Stafford town and is not an isolated rural settlement. There is an identified need for housing across the district as a whole, whilst any oversupply that may have been delivered by Stafford is not a relevant consideration when preparing the plan for South Staffordshire as it is a different HMA.</p> <p>Any future planning application would be expected to address Policy NB4 insofar as they must conserve and enhance the landscape and scenic beauty of the area and habitats sites and conform with the most up to date SPDs.</p> <p>Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies. Engagement throughout plan preparation has taken place with Local Highways Authority, School Organisation Team (SOT) (both Staffordshire County Council), and Staffordshire and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical Commissioning Group). None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities, or addressed through proposed Policies HC14, and HC15.</p> <p>The council considers that all proposed allocations comply with the NPPF and the spatial strategy (identified in Policy DS5) insofar as they are located to deliver sustainable patterns of development that are distributed across the district on strategic planning matters and meet the authorities' identified housing need.</p> <p>No change proposed.</p>
Williamson, G (MP)	STA24-051-01	Policy SA3	Consideration given to remove land at Acton Hill, Stafford from the Local Plan as the local infrastructure is already under pressure and the development of this site will assist larger developments later on. Must retain Grade 3A farming land.	Not stated	Not stated	Not stated	<p>Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies. Engagement throughout plan preparation has taken place with Local Highways Authority, School Organisation Team (SOT) (both Staffordshire County Council), and Staffordshire</p>

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							<p>and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical Commissioning Group). None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities, or addressed through proposed Policies HC14, and HC15.</p> <p>The proposed allocation of the low-lying, northern portion of the wider site is designed to overcome issues with the southern portion and its impact upon the historic environment. The council considers that these site-specific issues will prevent any future development to the south of the proposed allocation.</p> <p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district's agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p> <p>No change proposed.</p>
Barron, J (Cllr)	STA24-002-01	Policy SA3	<p>Site 036c - South of Stafford</p> <p>The plan is not legally compliant and has not been the subject of effective duty to cooperate with Stafford Borough Council and is a breach of the NPPF. Request for this site 036C to be deleted from South Staffs local plan review 2023 to 2041.</p> <p>The site at this location is far less sustainable and deliverable than other sites in South Staffordshire. Stafford Borough is not relying on South Staffordshire Districts local plan to meet any of its housing needs. The residents of Wildwood have significant concerns regarding this development right next to the extremely large Wildwood estate and its impact on local schools, health facilities, highways etc. This highly productive agricultural field should not be used for development when other brown field sites and land to the north of Penkridge are available. There are serious concerns regarding the narrow Acton Hill Road cut through to the M6. This site 036C is remote from any of South Staffs services and will rely on Stafford Borough for all its needs.</p>	No	No	No	<p>The council considers that all proposed allocations comply with the NPPF and the spatial strategy (identified in Policy DS5) insofar as they are located to deliver sustainable patterns of development that [are distributed across the district on strategic planning matters] and meet the authorities' identified housing need.</p> <p>SBC DTC</p> <p>Any oversupply that may have been delivered by Stafford is not a relevant consideration when preparing the plan for South Staffordshire as it is a different HMA. The justification for proposing site 036c is set out in the Housing Site Assessment Topic Paper 2024.</p> <p>Implications for local services and infrastructure have been assessed alongside the relevant</p>



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							<p>responsible bodies. Engagement throughout plan preparation has taken place with Local Highways Authority, School Organisation Team (SOT) (both Staffordshire County Council), and Staffordshire and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical Commissioning Group). None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities, or addressed through proposed Policies HC14, and HC15.</p> <p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district's agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p> <p>As set out in the Housing Site Selection Topic Paper 2022, there is very limited available brownfield land located within the district, and not enough to meet the district's housing requirement in full. Where brownfield site opportunities are available, these have been included within the Local Plan.</p> <p>The site allocation is located adjacent to Stafford town and is not an isolated rural settlement as it is located adjacent to Stafford town where community facilities and other services and infrastructure are available.</p> <p>No change proposed.</p>
Gwilt, P	RES24-092-01	Policy SA3	<p>OBJECT to the proposed site allocation ref. 036c The site adjoins Stafford Borough Boundary, so will have a significant impact on our services. Our Schools/Medical facilities/Roads will be unable to cope with the additional demand resulting from the housing proposal which is currently for a minimum of 81 houses. Old Croft Road and Acton Hill road will be used as 'rat runs' and are both unsuitable for excessive traffic.</p>	Not stated	Not stated	Not stated	<p>Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies. Engagement throughout plan preparation has taken place with Local Highways Authority, School Organisation Team (SOT) (both Staffordshire County Council), and Staffordshire and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical</p>

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			<p>National regulations require that building on green fields and farmland is minimized. At a time when food security is a priority , this high quality arable land must be protected from developers.</p> <p>The site has been identified as 'HIGH' landscape sensitivity and replacing our precious countryside with a housing development will have a major negative impact on our area.</p> <p>Applications for planning permission on this land have previously been refused and withdrawn and the reasons for objecting to the proposed development of the land has not changed.</p>				<p>Commissioning Group). None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities, or addressed through proposed Policies HC14, and HC15.</p> <p>The council considers that the site-specific issues relating to the historic environment will prevent any future development to the south of the proposed allocation.</p> <p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district's agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p> <p>Landscape sensitivity has been assessed through the Landscape Sensitivity Study. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that better perform as sustainable allocations. Any future planning application would be expected to address Policy NB4 – which the council has included as a proposed policy in the plan.</p> <p>The refusal of planning permission historically does not preclude a site from being proposed for allocation. Like all sites proposed for residential allocation, site 036c has been assessed in the round against a consistent set of planning criteria in order to determine those that better perform as sustainable allocations.</p> <p>No change proposed.</p>
Acton Trussell, Bednall and Teddesley Hay Parish Council	STA24-001-01	Policy SA3	<p>Site Ref 036C</p> <p>The site has been recognised as being high landscape sensitivity. The reduction in the extent of the proposal from 151 dwellings to 81 dwellings does not negate or overcomes that finding and major negative impacts are anticipated.</p>	No	No	No	<p>Landscape sensitivity has been assessed through the Landscape Sensitivity Study. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that</p>

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			<p>The site and its setting display characteristic features of agricultural areas, intensive arable farming, hedged fields, small winding lanes and without any incongruous landscape features. The proposal will be visually obtrusive to what is currently an attractive local view and from Cannock Chase AONB. With the exception of the A34 the site is contiguous with Cannock Chase AONB across other open countryside and links the AONB with the valley of the River Penk and canals.</p> <p>No clear defensible southern boundary to the development. This is an arbitrary line across the field with no physical features and if developed, land promoters will press for additional houses to be built.</p> <p>Site 036c is not presently assessed as Green Belt but does meet 3 of the 5 purposes of Green Belt land.</p> <p>The land is open countryside, productive farming land and is some of the "best and most versatile agricultural land" in the country.</p>				<p>better perform as sustainable allocations. Any future planning application would be expected to address Policy NB4 – which the council has included as a proposed policy in the plan.</p> <p>Any future planning application would be expected to address Policy NB4 insofar as they must conserve and enhance the landscape and scenic beauty of the area and habitats sites and conform with the most up to date SPDs.</p> <p>The council considers that the site-specific issues pertaining to the historic environment will prevent any future development to the south of the proposed allocation.</p> <p>The council has does not consider there to be exceptional circumstances to add Green Belt through the plan making process as per paragraph 144 of the NPPF.</p> <p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district's agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p> <p>No change proposed.</p>
Acton Trussell, Bednall and Teddesley Hay Parish Council	STA24-001-01	Policy SA3	<p>In respect of proposed site allocation 036c, the Plan is unsound and may not be legally compliant.</p> <p>It has not been the subject of effective 'duty to co-operate' liaison with Stafford Borough Council (SBC) and appears contrary to National Planning Policy by virtue of this lack of effective cooperation and inadequate emphasis given to obligations to maintain natural and local environment.</p>	No	No	No	<p>Stafford Borough Council and SSDC have an agreed SoCG that addresses Duty to Cooperate matters effectively that both parties consider to be sound and lawful as set out in the Duty to Cooperate Topic Paper 2024.</p> <p>The council considers that all proposed allocations comply with the NPPF and the spatial strategy (identified in Policy DS5) insofar as they are located to deliver sustainable patterns of development that are distributed across the district on strategic planning matters and meet the authorities' identified housing need.</p>

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							No change proposed.
Acton Trussell, Bednall and Teddesley Hay Parish Council	STA24-001-01	Policy SA3	<p>Site Ref 036c The Cannock Chase AONB is recognised as a highly sensitive area where visitor management is critical. Recreational use is predicted to increase with new housing development in the vicinity. There is a need to meet recreational demand while ensuring issues associated with high levels of recreational use do not cause damage.</p> <p>There is no overriding need for development in the locality. Stafford Borough Council's response to the proposed allocation in the 2022 consultation stated "would be in the immediate setting of the AONB and lead to a detrimental impact on the AONB and should not go ahead".</p>	No	No	No	<p>Development in locations to the northeast of the district towards Cannock Chase National Landscape, have the potential to have a negative effect on the character and/or setting of the National Landscape. Any future planning application would be expected to address Policy NB4 insofar as they must conserve and enhance the landscape and scenic beauty of the area and habitats sites and conform with the most up to date SPDs.</p> <p>Any oversupply that may have been delivered by Stafford is not a relevant consideration when preparing the plan for South Staffordshire as it is a different HMA. The justification for proposing site 036c is set out in the Housing Site Assessment Topic Paper 2024.</p> <p>Stafford Borough Council and SSDC have an agreed SoCG that addresses Duty to Cooperate matters effectively that both parties consider to be sound and lawful as set out in the Duty to Cooperate Topic Paper 2024.</p> <p>No change proposed.</p>
Acton Trussell, Bednall and Teddesley Hay Parish Council	STA24-001-01	Policy SA3	<p>Site Ref 036c It is clear from previous representations to the Council that the residents of Wildwood have significant concerns regarding the ability of local schools and health facilities to cater for the increased demand.</p> <p>Stafford Borough Council's response stated the proposed did "not demonstrate it would provide appropriate infrastructure to mitigate the impact. There is no relationship to the existing urban form. The site is remote from any settlement or services in South Staffordshire, with the occupiers of the development looking to Stafford town to provide their services. Accordingly this will impact on schools and leisure provision in Stafford, which have a number of capacity issues." It also states that the area of Stafford town cannot accommodate further school provision.</p> <p>The Staffordshire CC SBS Potential Sites Consultation assesses Stafford south as a red classification for schooling with "no mitigation possible on existing sites at all required education phases". There is no evidence that SSDC has taken this critical issue into account in the site assessment.</p> <p>Increase in traffic on already congested roads, resulting air pollution is a significant concern. The existing traffic using Acton</p>	No	No	No	<p>Engagement throughout plan preparation has taken place with the School Organisation Team (SOT) at Staffordshire County Council. They have not indicated that the impact of the proposed allocation is incapable of being mitigated through financial contributions in line with Policy HC15.</p> <p>Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies. Engagement throughout plan preparation has taken place with Local Highways Authority, (Staffordshire County Council), and Staffordshire and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical Commissioning Group). Neither of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities, or addressed through proposed Policies HC14, and HC15.</p> <p>The impact upon air quality from development on</p>

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			<p>Hill Road as a 'cut through' to the M6 is already causing extensive damage and makes it dangerous to walk. Site 036c is unsustainable for growth in a rural community, despite its proximity to Stafford. Private vehicles will be needed and public transport is poor with significant traffic congestion. Whilst Stafford does have a main rail station, access to it from 036c will be impeded by these factors. GPs surgeries in the area are operating with excessive practice lists.</p>				<p>designated sites has been considered by partner authorities that has incorporated assessments of the predicted growth in vehicular movements across all site allocations. This includes cumulative impacts. Furthermore, there is only one Air Quality Management Area (AQMA) in the district which is located along the A5 between M6 J12 and Cannock (AQMA No.5 Oak Farm) where there are no allocations proposed.</p> <p>All site-specific design considerations will be assessed in detail at the point of determining any future planning application. At this time, the council considers Policy HC10 (Design Requirements) sufficient to ensure all development meets appropriate requirements and delivers high quality design features which suit their respective contexts.</p> <p>The site allocation is located adjacent to Stafford town and is not an isolated rural settlement as it is located adjacent to Stafford town where community facilities and other services and infrastructure are available.</p> <p>The council has included a sustainable transport policy (Policy EC12) that is considered to sufficient to address sustainable transport matters on a scheme-by-scheme basis. It will ensure that all development (including proposed allocations) maximises opportunities for walking, cycling, and public transport usage, and deliver expanded provision to meet increased cumulative demand for bus and rail services and connections.</p> <p>No change proposed.</p>
Williams, A & T	RES24-253-01	Policy SA3	<p>In respect of site 036c, the Plan is unsound and may not be legally compliant. It has evidently not been the subject of effective 'duty to co-operate' liaison with Stafford Borough Council (SBC). The use of site 036c fails the NPPF December 2023, compliance with the NPPF is a legal obligation.</p> <p>The land is productive farmland, classified by SSDC consultant SA Report October 2022 as Grade 3, but transitioning to Grade 2 towards the village of Acton Trussell.</p>	No	No	No	<p>The council considers that all proposed allocations comply with the NPPF and the spatial strategy (identified in Policy DS5) insofar as they are located to deliver sustainable patterns of development that [are distributed across the district on strategic planning matters] and meet the authorities' identified housing need.</p> <p>Stafford Borough Council and SSDC have an agreed SoCG that addresses Duty to Cooperate matters effectively that both parties consider to be sound and lawful as set out in the Duty to</p>



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			<p>It is classical rolling countryside providing an excellent vista from both the large Wildwood (Stafford) development and the A34 SE of Stafford.</p> <p>The site is noted for its diversity of wildlife. 34 species of birds are seen on a regular basis, together with deer, badgers, bats and hares. It is an important wildlife and biodiversity link between the Cannock Chase AONB and the Staffs and Worcester Canal and the River Penk valley to the west. Connectivity is established as important in the Staffordshire Wildlife Trust Biodiversity Report; it appears to have been ignored in the Plan.</p> <p>The expressed reason for the use of this land within the Plan is that it is not Green Belt. This might be justified if the 81 houses were either necessary to meet overall SSDC housing demand or local demand. Paragraph 5.28 of the Plan notes there is no local 'unmet housing need'.</p> <p>Any argument that 036c least damaging to the natural environment is flawed because:</p> <ul style="list-style-type: none"> <li>- SSDC's consultants rated the site as a Major Positive in respect of Education. This does not take into account that local schools are confirmed as full. If the incorrect assessment in respect of Education were to be removed, the consultant's assessment would be expected to be reversed.</li> <li>- The land is within the SAC of the Cannock Chase AONB. This conflicts with the SDC SAC Cannock Chase Special Area Of Conservation (SAC) Guidance To Mitigate The Impact Of New Residential Development (March 2022) Policy EQ2.</li> <li>- Any suggestions that the damage to environment can be mitigated by 'diversity of domestic gardens' or financial mitigation to Cannock Chase AONB are derisory.</li> <li>- Of all the sites assessed by the SSDC HRA consultants supporting the Publication Plan, Appendix 4, sites 016 (Pear Tree Farm, Huntington, a Tier 2 Settlement) and site 036c are the closest sites to Cannock Chase AONB, at 2.0km and 2.1km respectively.</li> <li>- The choice of site 036c is unsound in terms of localised housing need. It is intimately linked to the southern boundary of SBC. SBC has provided significantly more housing than their minimum requirements. There are significant extant and planned housing developments in the south of Stafford which, whilst providing significant housing availability have also provided excessive demands on local schools and health provisions which SSDC have assumed will provide services.</li> <li>- Dispute the number of homes proposed in the plan. Houses would be more effectively placed a greater distance from Stafford. It is suggested that sites not constrained by Green Belt constraints, such as Cheslyn Hay/Great Wyrley, Codsall/Bilbrook,</li> </ul>				<p>Cooperate Topic Paper 2024.</p> <p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district's agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p> <p>Landscape sensitivity has been assessed through the Landscape Sensitivity Study. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that better perform as sustainable allocations. Any future planning application would be expected to address Policy NB4 – which the council has included as a proposed policy in the plan.</p> <p>The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact on habitats sites.</p> <p>The council has sought to maximise the development opportunities on sites outside of the Green Belt in the first instance, this includes site 036c located within Open Countryside, before identifying Green Belt sites. This approach is in conformity with paragraphs 146 and 147 of the NPPF.</p> <p>Engagement throughout plan preparation has taken place with the School Organisation Team (SOT) at Staffordshire County Council. They have not indicated that the impact of the proposed allocation is incapable of being mitigated through financial contributions in line with Policy HC15.</p> <p>Development in locations to the northeast of the</p>

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			<p>or even more appropriately, sites further south closer to the West Midlands, could logically be reconsidered to be enlarged to deliver the 81 dwellings.</p> <p>- Questions whether the 4.4 hectares considered suitable for development in the SSDC Brownfield Land Register could be used as a suitable alternative to site 036c.</p> <p>Site 036c is unnecessary and surplus to reasonable requirements and should be removed from the plan.</p>				<p>district towards Cannock Chase National Landscape, have the potential to have a negative effect on the character and/or setting of the National Landscape. Any future planning application would be expected to address Policy NB4 insofar as they must conserve and enhance the landscape and scenic beauty of the area and habitats sites and conform with the most up to date SPDs. Any specific developer contributions that are required to mitigate any adverse impacts of development on Cannock Chase SAC will be secured at the point of a planning application approval. The council considers that the mechanism to secure such a financial contribution is through Policy NB3 is satisfactory.</p> <p>Any oversupply that may have been delivered by Stafford is not a relevant consideration when preparing the plan for South Staffordshire as it is a different HMA.</p> <p>The Brownfield Land Register is not designed to form part of the site selection process, although sites included within it which do not have planning permission are included within the Council's Strategic Housing and Economic Land Availability Assessment (SHELAA) which does form part of the site selection evidence base to the plan.</p> <p>No change proposed.</p>
France, A.M	RES24-073-01	Policy SA3	<p>Plan is unsound and may not be legally compliant - not been subject of effective duty to co-operate liaison with Stafford BC. Doesn't comply with NPPF.</p> <p>Land is productive farmland as grade 3a but transitioning to grade 2 towards Acton Trussell.</p> <p>Diversity of wildlife - important biodiversity which is ignored in the plan.</p> <p>Doesn't meet policy DS3 objectives.</p> <p>Policies not met overall development strategy. Housing in wrong location and being excessively provided in the 2024 plan. Design standards not met . landscape character and assets not met.</p> <p>Heritage asset not addressed. Ecological assets and biodiversity not met and cannot be realistically met by claimed offsets such as diversity in gardens or financial contributions to the Cannock Chase AONB. recreational assets not met. Housing mix</p>	No	No	No	<p>The council considers that all proposed allocations comply with the NPPF and the spatial strategy (identified in Policy DS5) insofar as they are located to deliver sustainable patterns of development that meet the authorities' identified housing need.</p> <p>Stafford Borough Council and SSDC have an agreed SoCG that addresses Duty to Cooperate matters effectively that both parties consider to be sound and lawful as set out in the Duty to Cooperate Topic Paper 2024.</p> <p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district's agricultural land is classified as potential BMV,</p>

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			<p>requirements not met. sustainable travel requirements nil within SSDC and severely overloaded within SBC. No local unmet housing need.</p> <p>Unsound on basis of least damaging to the natural environment. Flawed as does not take into account local schools are confirmed as full. Land within SAC not taken into account and conflicts with guidance March 2022. In migration calculations not taken into account in respect of the 2024 Publication Plan.</p>				<p>classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p> <p>The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact on habitats sites.</p> <p>Allocation of the site will remove it from designation as Open Countryside and therefore Policy DS3 would not apply. Once removed from the open countryside, there will not be a requirement to conform to Policy DS3 but rather the relevant DM policies that are applicable. Development strategy/policies</p> <p>The Council has used the standard method formula to determine our housing need and does not consider that exceptional circumstances exist to deviate from its use. The Council considers that the use of the standard method as the basis of our housing requirement is justified and an appropriate strategy.</p> <p>All site-specific considerations will be assessed in detail at the point of determining any future planning application, including design, recreation, housing mix, and sustainable travel. At this time, the council considers Policy HC10 (Design Requirements), HC17 (Open Space), HC18 (Sports Facilities and Playing Pitches), HC1 (Housing Mix), and EC12 (Sustainable Transport) sufficient to ensure all development meets appropriate policy requirements.</p> <p>Landscape sensitivity has been assessed through the Landscape Sensitivity Study. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that</p>

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							<p>better perform as sustainable allocations. Any future planning application would be expected to address Policy NB4 – which the council has included as a proposed policy in the plan.</p> <p>Any specific developer contributions that are required to mitigate any adverse impacts of development on Cannock Chase SAC will be secured at the point of a planning application approval. The council considers that the mechanism to secure such a financial contribution is through Policy NB3 is satisfactory.</p> <p>Any oversupply that may have been delivered by Stafford is not a relevant consideration when preparing the plan for South Staffordshire as it is a different HMA.</p> <p>Engagement throughout plan preparation has taken place with the School Organisation Team (SOT) at Staffordshire County Council. They have not indicated that the impact of the proposed allocation is incapable of being mitigated through financial contributions in line with Policy HC15.</p> <p>Any future planning application would be expected to address Policy NB4 insofar as they must conserve and enhance the landscape and scenic beauty of the area and habitats sites and conform with the most up to date SPDs.</p> <p>No change proposed.</p>
Acton Trussell, Bednall and Teddesley Hay Parish Council	STA24-001-01	Policy SA3	<p>Site Ref 036c</p> <p>The housing strategy aims to provide for the district’s own housing need and some of the unmet need of the GBBCHMA of 4086 and 640 dwellings. No allowance is made to accommodate the housing needs of Stafford.</p> <p>The target of 4726 is exceeded by the housing proposals set out on page 31. The total housing provided adds up to 5199.</p> <p>Historically the minimum housing numbers set out in the SAD have been significantly exceeded (details in full rep).</p> <p>The minimum capacity was 485 with an actual capacity of 697, an underestimate of over 40%, resulting in an over provision of</p>	No	No	No	<p>Stafford and South Staffordshire are in a different Housing Market Area, and Stafford BC have not declared an unmet housing need to be accommodated elsewhere.</p> <p>Ensuring plans can respond to changing circumstances is a key requirement of Local Plans and the principle of ‘over allocation’ to ensure the plan is flexible in this regard has been long established. So too has the practice of identifying and presenting site capacity as a ‘minimum’ number of dwellings, and site capacities are ultimately determined at the point of planning application where the finer site-specific details are accounted for.</p>

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			<p>housing.</p> <p>PP overproviding to meet the housing target but capacity is significantly underestimated and therefore insufficient justification for including 036c in the PP.</p> <p>Justification for including 036 is it is not Green Belt. It is not justified by the housing needs of SSDC and not required by Stafford Borough Council who strenuously opposed it.</p> <p>The ONS advised the population of South Staffordshire has increased by 2.2% from 2011 to 2021. This is a smaller increase than the West Midlands and the overall population in England. It is among the lowest 30% for population density across England. The ONS data is not reflected in the SSDC PP and undermines justification for over-provision of housing and development on 036c.</p> <p>It is not evident that SSDC has completed or considered the outcome of its legal obligation in respect of the duty to co-operate, or legal obligation of conforming to the NPPF in respect of protecting and enhancing landscapes, biodiversity, geology and soils, economic and other benefits of BMV agricultural land.</p>				<p>The council has sought to maximise the development opportunities on sites outside of the Green Belt in the first instance, this includes site 036c located within Open Countryside, before identifying Green Belt sites. This approach is in conformity with paragraphs 146 and 147 of the NPPF. Albeit as a relatively smaller proposed allocation, site 036c will still contribute to meeting the housing needs of South Staffordshire alongside the other residential allocations in the plan.</p> <p>The Council has used the standard method formula to determine our housing need and does not consider that exceptional circumstances exist to deviate from its use, including population projections. The Council considers that the use of the standard method as the basis of our housing requirement is justified and an appropriate strategy.</p> <p>The council considers that all proposed allocations comply with the NPPF and the spatial strategy (identified in Policy DS5) insofar as they are located to deliver sustainable patterns of development. Stafford Borough Council and SSDC also have an agreed SoCG that addresses Duty to Cooperate matters effectively that both parties consider to be sound and lawful as set out in the Duty to Cooperate Topic Paper 2024.</p> <p>No change proposed.</p>
Staffordshire County Council LLFA	STA24-044-19	Policy SA3	<p>Ref 036c - Land at Weeping Cross (adjoining Stafford borough boundary) Surface water - very minor surface water flow pathway.</p>	Not stated	Not stated	Not stated	<p>The council acknowledges the Lead Local Flood Authority's support in preparing the plan and note that all proposed allocations have been screened by the council against fluvial flood zones to determine unsuitable sites within flood zone 3. Remaining sites have been assessed by the Lead Local Flood Authority (LLFA) to determine sites which presented unmitigable flood risk(s). A level 2 Strategic Flood Risk Assessment (SFRA) was also commissioned to address Environment Agency concerns pertaining to 8 sites, which site 036c was not one. This process is set out in more detail in the Strategic Flood Risk Assessment and Sequential Test Topic Paper 2024.</p> <p>No change proposed.</p>



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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
Baker, J	RES24-006-01	Policy SA3	Site 036c south of Stafford Object to site for the reasons below: Lack of need Visual intrusion and impact on farming and environment Impact on Cannock Chase AONB Impact on services in Weeping Cross and Stafford	No	No	No	<p>The Council has used the standard method formula to determine our housing need. The Council considers that the use of the standard method as the basis of our housing requirement is justified and an appropriate strategy. Any oversupply that may have been delivered by Stafford is not a relevant consideration when preparing the plan for South Staffordshire as it is a different HMA.</p> <p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district's agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p> <p>Development in locations to the northeast of the district towards Cannock Chase National Landscape, have the potential to have a negative effect on the character and/or setting of the National Landscape. Any future planning application would be expected to address Policy NB4.</p> <p>Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies as set out in the Housing Site Selection Topic Paper 2024. None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities or addressed through proposed policies.</p> <p>No change proposed.</p>
Butt, S	RES24-032-01	Policy SA3	Site 036C Objection. No infrastructure to support population. Insufficient recreational land.	Not stated	Not stated	Not stated	<p>Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies as set out in the Housing Site Selection Topic Paper 2024. None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							<p>infrastructure responsibilities or addressed through proposed policies.</p> <p>A range of evidence pertaining to open space, sport, and recreation has been produced to inform the preparation of the local plan both in regard to draft policies (specifically HC17 Open Space, and HC18 Sports Facilities and Playing Pitches) and proposed site allocations. In short, recreation facilities/infrastructure has a minimal evidenced shortfall which nevertheless can be rectified through improved quality and access to existing provision. As such, the council considers policies HC17 and HC18 satisfactory in securing an appropriate level of future multi-functional, publicly accessible, open space, and protecting existing sports facilities and playing pitches.</p> <p>No change proposed.</p>
Martin, A.J	RES24-142-01	Policy SA3	<p>Although the land is in private ownership, it is still classed as green open space which has only ever been used for farming, and forms the start of the countryside separation surrounding the Residential Development Boundary.</p> <p>As the NPPF is the governing document for the consideration of planning schemes, it would appear that this application falls foul of the criteria for providing and retaining green open space as it most certainly is not surplus to requirement.</p> <p>One of the most important key features of this area of land is its natural topography, abundance of wild life and high quality agricultural qualities. The site consists of steeply sloping hills supporting native hedgerows, long grasses and a variety of trees. This forms the perfect habitat for insects and butterflies which in turn supports a large variety of birds including birds of prey, and bats, and of course ground dwelling mammals such as rabbits, foxes hedgehogs and badgers etc. Fallow deer have often been photographed in this field. Development on any part of this site will inevitably sterilise the entire site which would result in a devastating impact on the local ecology.</p> <p>Land of this topography is also not conducive to building, there would need to be extensive remodelling and alterations to the landscape which cannot be considered as sustainable or financially viable. There are more suitable sites elsewhere within the borough which don't have the geological or ecological</p>	No	No	No	<p>The council does not consider that the proposed allocation of site 036c will have a negative impact upon the separation of Stafford town and the villages/settlements within South Staffordshire District. As a small urban extension, the site option performs better than other site options as set out in the Housing Site Selection Topic Paper 2024.</p> <p>The NPPF requirements for assessing surplus open space at paragraphs 102 and 103) are not applicable to this site as it is not designated as such.</p> <p>The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact on habitats sites.</p> <p>The viability of the site has not been identified as problematic through the Viability Study 2022, nor by the site promotor; and the council has an agreed Statement of Common Ground with the developer to deliver a policy compliant scheme on the site.</p> <p>As set out in the Housing Site Selection Topic</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>implications, which would yield a greater return resulting in a much more effective land use.</p> <p>The loss of prime agricultural land should also be resisted especially considering the ever increasing demand for food production worsened by recent global instability and insecurity. Brown Field sites elsewhere within the South Staffs borough should be cleaned up and developed instead of losing valuable arable land.</p> <p>Concern regarding increased traffic movements to and from the site and the effect to the existing infrastructure. The roads contained within the Baswich and Weeping Cross estates are largely sub standard in terms of width and have been at saturation point regarding numbers of vehicles for some considerable time. Additional traffic filtering through the existing highways network, causing even more gridlock, and more importantly elevating the dangers of conflict between pedestrians, cyclists and vehicles. Queries whether a full and detailed unbiased highway safety audit has been carried out, and one that would stand scrutiny from an independent third party specialist consultant.</p> <p>The site lies within 1.5miles of Cannock Chase National Landscape [formerly Area Of Outstanding Natural Beauty] which is already severely under threat from excessive use by visitors. Any future developments of this size would only cause further harm to this special and protected area.</p> <p>The "community facilities" within the local area are at breaking point. The Doctor's surgery at Weeping Cross cannot provide the level of medical cover necessary for the existing aging community due to the limited size of the premises. Primary and secondary schools in the catchment area are currently operating at full capacity.</p> <p>For these reasons we insist South Staffs Council remove this site from their draft plan as land is developed which results in all of the ensuing harm being inflicted on a neighbouring authority whilst all of the financial benefits are retained by the host authority.</p>				<p>Paper 2022, there is very limited available brownfield land located within the district, and not enough to meet the district's housing requirement in full. Where brownfield site opportunities are available, these have been included within the Local Plan. However, the proposed allocation of greenfield (both Green Belt and Open Countryside) sites is necessary to contribute to the district's housing requirement.</p> <p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district's agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p> <p>Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies. Engagement throughout plan preparation has taken place with Local Highways Authority, School Organisation Team (SOT) (both Staffordshire County Council), and Staffordshire and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical Commissioning Group). None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities, or addressed through proposed Policies HC14, and HC15. The site allocation is located adjacent to Stafford town and is not an isolated rural settlement as it is located adjacent to Stafford town where community facilities and other services and infrastructure are available.</p> <p>Development in locations to the northeast of the district towards Cannock Chase National Landscape, have the potential to have a negative effect on the character and/or setting of the National Landscape. Any future planning application would be expected to address Policy</p>

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							NB4 insofar as they must conserve and enhance the landscape and scenic beauty of the area and habitats sites and conform with the most up to date SPDs.  No change proposed.
Webb, A	RES24-247-01	Policy SA3	Objection to site 036c Traffic increase and risk of serious accidents.	Not stated	Not stated	Not stated	Engagement throughout plan preparation has taken place with Local Highways Authority (Staffordshire County Council). They have not indicated that [access to the site is problematic or unmitigable] the impact of the proposed allocation would not generate any significant impacts on the transport network or highway safety that cannot be mitigated in line with paragraph 114 d of the NPPF.  No change proposed.
Amos, K	RES24-004-01	Policy SA3	Plan is for 81 houses will inevitably increase to around 500. Not necessary and Stafford Council do not agree with it. Will put more pressure on local services which are already under pressure, medical, schools, roads, water, sewage.	No	No	No	The practice of identifying and presenting site capacity as a 'minimum' number of dwellings is well established, and site capacities are ultimately determined at the point of planning application where the finer site-specific details are accounted for.  Stafford Borough Council (SBC) and SSDC have an agreed SoCG that addresses Duty to Cooperate matters effectively that both parties consider to be sound and lawful as set out in the Duty to Cooperate Topic Paper 2024.  Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies as set out in the Housing Site Selection Topic Paper 2024. None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities or addressed through proposed policies. The council has undertaken continual engagement with both Severn Trent Water and South Staffs Water throughout the preparation of the Local Plan, this has culminated in the production of a Water Cycle Study 2020 to identify impacts of draft allocations upon water supply, wastewater collection and treatment and water quality. A copy of the site capacity assessment can be found in the Strategic Flood

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							Risk Assessment and Sequential Test Topic Paper 2024 which indicates none of the proposed housing allocations would have a greater than 'medium' impact.  No change proposed.
Bartlam, S	RES24-010-01	Policy SA3	To allow open countryside to be developed for homes is unsound Impact on farming and environment and visual intrusion including destroying a valuable existing greenway.	Not stated	Not stated	Not stated	<p>The council has sought to maximise the development opportunities on sites outside of the Green Belt in the first instance, this includes site 036c located within Open Countryside, before identifying Green Belt sites. This approach is in conformity with paragraphs 146 and 147 of the NPPF.</p> <p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district's agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p> <p>Landscape sensitivity has been assessed through the Landscape Sensitivity Study. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that better perform as sustainable allocations. Any future planning application would be expected to address Policy NB4 – which the council has included as a proposed policy in the plan – insofar as the design and location of new development should take account of the characteristics and sensitivity of the landscape and its surroundings, including not having a detrimental impact upon any medium or long-distance views.</p> <p>No change proposed.</p>
Matthews, S	RES24-147-01	Policy SA3	South Staffs has a legal duty to comply with the National Planning Policy Framework. Site 036c is part of the setting of Cannock Chase which is an AONB and includes an SSSI and also SBIs. Site 036c forms a	No	No	No	Development in locations to the northeast of the district towards Cannock Chase National Landscape, have the potential to have a negative effect on the character and/or setting of the



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			<p>wildlife corridor between the Chase and Penk Vale. Building 81 houses on the site will clearly have an adverse effect on the wildlife on Cannock Chase, disrupting the corridor and disturbing wildlife through light and noise pollution contrary to NPPF paragraphs 186b and 182.</p> <p>Note that South Staffs have identified an adjacent area O36a as potentially suitable for the same developer to build 2823 houses, concerned that the initial development of 81 houses will pave the way for further development.</p> <p>The views of rolling countryside have huge amenity value for people living or passing through the area, e.g. on the A34. Cannock Chase is prized not only locally but by visitors from all over the West Midlands and beyond for its recreational and amenity value, making it imperative to preserve its setting, which acts as a buffer zone for the Chase which must be protected as set out in NPPF Paragraph 191b.</p> <p>Building 81 houses on Site 036c, which is Grade 2 -3 farmland and has been productively farmed for generations will certainly conflict with Policy DS3.</p> <p>This the Plan is compliant neither with the NPPF nor the Council's own Policy DS3</p> <p>The development proposal is inconsistent with paragraph 5.28. This location will not be a focus for larger-scale housing growth. This recognises the sensitive landscape and potential highways concerns that larger scale growth in this location could cause, as well as the lack of unmet housing needs in Stafford and the location's remoteness from areas where unmet needs are generated'.</p> <p>The proposal shows complete failure to co-operate with Stafford Borough. As Site 036C is right on the boundary between Stafford and South Staffs it is highly likely that residents would regard themselves as living in Stafford, and would look for services such as schools and doctors in Stafford. Local schools are full and medical services overloaded. The A34 between Wildwood and Stafford town is already choked by regular traffic jams.</p> <p>Stafford Borough is opposed to this development.</p> <p>South Staffs itself has already twice rejected proposals by the</p>				<p>National Landscape. Any future planning application would be expected to address Policy NB4 insofar as they must conserve and enhance the landscape and scenic beauty of the area and habitats sites and conform with the most up to date SPDs.</p> <p>The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact on habitats sites.</p> <p>The proposed allocation of the low-lying, northern portion of the wider site is designed to overcome issues with the southern portion (site 036a) and its impact upon the historic environment. The council considers that these site-specific issues will prevent any future development to the south of the proposed allocation.</p> <p>Landscape sensitivity has been assessed through the Landscape Sensitivity Study. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that better perform as sustainable allocations. Any future planning application would be expected to address Policy NB4 – which the council has included as a proposed policy in the plan</p> <p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district's agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p> <p>The council considers that all proposed allocations comply with the NPPF and the spatial</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			same developer to build on Site 036c.				<p>strategy (identified in Policy DS5) insofar as they are located to deliver sustainable patterns of development that are distributed across the district on strategic planning matters and meet the authorities' identified housing need.</p> <p>Allocation of the site will remove it from designation as Open Countryside and therefore Policy DS3 would not apply. Once removed from the open countryside, there will not be a requirement to conform to Policy DS3 but rather the relevant DM policies that are applicable.</p> <p>The proposed allocation of the low-lying, northern portion of the wider site is designed to overcome issues with the southern portion and its impact upon the historic environment. The council considers that these site-specific issues will prevent any future development to the south of the proposed allocation.</p> <p>Any oversupply that may have been delivered by Stafford is not a relevant consideration when preparing the plan for South Staffordshire as it is a different HMA. The justification for proposing site 036c is set out in the Housing Site Assessment Topic Paper 2024.</p> <p>Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies as set out in the Housing Site Selection Topic Paper 2024. None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities or addressed through proposed policies.</p> <p>Stafford Borough Council (SBC) and SSDC have an agreed SoCG that addresses Duty to Cooperate matters effectively that both parties consider to be sound and lawful as set out in the Duty to Cooperate Topic Paper 2024.</p> <p>The refusal of planning permission historically does not preclude a site from being proposed for allocation. Like all sites proposed for residential allocation, site 036c has been assessed in the round against a consistent set of planning criteria</p>

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							<p>in order to determine those that better perform as sustainable allocations.</p> <p>No change proposed.</p>
Wakeman, S	RES24-243-01	Policy SA3	<p>Site 036c Lack of need Visual intrusion Impact on Cannock Chase AONB Impact on services in weeping cross</p>	Not stated	Not stated	Not stated	<p>The Council has used the standard method formula to determine our housing need and does not consider that exceptional circumstances exist to deviate from its use. The Council considers that the use of the standard method as the basis of our housing requirement is justified and an appropriate strategy. Any oversupply that may have been delivered by Stafford is not a relevant consideration when preparing the plan for South Staffordshire as it is a different HMA.</p> <p>Landscape sensitivity has been assessed through the Landscape Sensitivity Study. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that better perform as sustainable allocations. Any future planning application would be expected to address Policy NB4 – which the council has included as a proposed policy in the plan – insofar as the design and location of new development should take account of the characteristics and sensitivity of the landscape and its surroundings, including not having a detrimental impact upon any medium or long-distance views.</p> <p>Development in locations to the northeast of the district towards Cannock Chase National Landscape, have the potential to have a negative effect on the character and/or setting of the National Landscape. Any future planning application would be expected to address Policy NB4 insofar as they must conserve and enhance the landscape and scenic beauty of the area and habitats sites and conform with the most up to date SPDs.</p> <p>Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies as set out in the Housing Site Selection Topic Paper 2024. None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective</p>

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							infrastructure responsibilities or addressed through proposed policies.  No change proposed.
McKeown, W	RES24-149-01	Policy SA3	<p>Summary: Site 036c The Plan is unsound and may not be legally compliant. It has evidently not been the subject of effective 'duty to co-operate' liaison with Stafford Borough Council (SBC) who oppose this site.</p> <p>Reasons for this are:</p> <ul style="list-style-type: none"> <li>- The proposed development will generate further strain on Stafford Borough's education provision that is already significantly overpopulated. Primary and High schools in the southeast of Stafford are full and education for disabled children is a particularly prominent example of the current and projected lack of educational services available. No plans for the development of educational infrastructure in the area. The removal of a significant false positive in alter this section of Lepus' appraisal of the land will mean that the consultant's assessment of it would be reversed.</li> <li>- The proposed site is part of SSDC and will be using Stafford Borough Councils' facilities, in an attempt to draw from neighbouring council's amenities, without contributing to their maintenance, development, or upkeep. This is in direct breach of point 3, subsection 24 of the National Planning Policy Framework</li> <li>- Significantly more dwellings will likely follow.</li> </ul>	No	No	No	<p>Stafford Borough Council (SBC) and SSDC have an agreed SoCG that addresses Duty to Cooperate matters effectively that both parties consider to be sound and lawful as set out in the Duty to Cooperate Topic Paper 2024.</p> <p>Engagement throughout plan preparation has taken place with the School Organisation Team (SOT) at Staffordshire County Council. They have not indicated that the impact of the proposed allocation is incapable of being mitigated through financial contributions in line with Policy HC15.</p> <p>The proposed allocation of the low-lying, northern portion of the wider site is designed to overcome issues with the southern portion and its impact upon the historic environment. The council considers that these site-specific issues will prevent any future development to the south of the proposed allocation.</p> <p>No change proposed.</p>
Monnox, D	RES24-151-04	Policy SA3	<p>Site 036c The Cannock Chase AONB is recognised as a highly sensitive area where visitor management is critical to maintaining its characteristics. With already planned increasing housing development in the wider vicinity and the growing human population, recreational use is predicted to increase. To identify a new housing site so close to the AONB is at odds with the need for its conservation, particularly where there is no overriding need for the site proposal. HC17 advises that the NPPF requires that existing open spaces should be protected.</p>	No	No	No	<p>Development in locations to the northeast of the district towards Cannock Chase National Landscape, have the potential to have a negative effect on the character and/or setting of the National Landscape. Any future planning application would be expected to address Policy NB4 insofar as they must conserve and enhance the landscape and scenic beauty of the area and habitats sites and conform with the most up to date SPDs.</p> <p>The Council has used the standard method formula to determine our housing need and does not consider that exceptional circumstances exist to deviate from its use. The Council considers that the use of the standard method as the basis</p>

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							<p>of our housing requirement is justified and an appropriate strategy.</p> <p>Any future planning application will be expected to conform with all relevant Development Management policies that are applicable at the time of consideration and determination.</p> <p>No change proposed.</p>
Bivol, P	RES24-016-01	Policy SA3	Site 036c Local schools are full and hard to fulfil actual demand. Traffic issues.	No	No	No	<p>Engagement throughout plan preparation has taken place with the School Organisation Team (SOT) at Staffordshire County Council. They have not indicated that the impact of the proposed allocation is incapable of being mitigated through financial contributions in line with Policy HC15.</p> <p>No change proposed.</p>
Sudlow, D	RES24-224-01	Policy SA3	Site 036c Plan is unsound and maybe illegal, not legally compliant. Not been the subject of effective duty to co-operate liaison with Stafford BC. Land is productive farmland and classified as grade 3. Tenant indicating land 3a. The site is noted for its diversity of wildlife such as bats and birds and it appears in Stafford Wildlife Trust Biodiversity Report, this has been ignored in the plan and in reference to site 036c. Considers the plan is unsound and should be deleted in its entirety.	No	No	No	<p>Stafford Borough Council (SBC) and SSDC have an agreed SoCG that addresses Duty to Cooperate matters effectively that both parties consider to be sound and lawful as set out in the Duty to Cooperate Topic Paper 2024.</p> <p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district's agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p> <p>The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact on habitats sites.</p> <p>No change proposed.</p>
Corfield, M	RES24-047-01	Policy SA3	Site 036c Insufficient infrastructure.	No	No	No	<p>Implications for local services and infrastructure have been assessed alongside the relevant</p>



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			<p>Schools and doctors full. Increased flooding. Increased traffic on Acton Hill Road which is very narrow will inevitably lead to many accidents. Taking away good farming land.</p>				<p>responsible bodies (including NHS/ICB, Local Education Authority, and Local Highways Authority) as set out in the Housing Site Selection Topic Paper 2024. None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities or addressed through proposed policies.</p> <p>All proposed allocations have been screened by the council against fluvial flood zones to determine unsuitable sites within flood zone 3. Remaining sites have been assessed by the Lead Local Flood Authority (LLFA) to determine sites which presented unmitigable flood risk(s). A level 2 Strategic Flood Risk Assessment (SFRA) was also commissioned to address Environment Agency concerns pertaining to 8 sites, which site 036c was not one. This process is set out in more detail in the Strategic Flood Risk Assessment and Sequential Test Topic Paper 2024.</p> <p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district's agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p> <p>No change proposed.</p>
Genway, I	RES24-080-01	Policy SA3	<p>Site 036c Tier 5 settlements are not intended to experience further housing. This is my reason for objection as the re-use of redundant and rural buildings are the only buildings that can be re-developed. Poor Public Transport links. No infrastructure.</p>	No	No	No	<p>The site allocation is located adjacent to Stafford town and is not an isolated rural settlement as it is located adjacent to Stafford town where community facilities and other services and infrastructure are available. It is not considered to impact upon the setting or character of Acton Trussell or other settlements as set out in the Housing Site Selection Topic Paper 2022.</p> <p>There is a bus route along the A34 Cannock Road that provides a regular service into Stafford Town and the railway station.</p>

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							<p>Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies as set out in the Housing Site Selection Topic Paper 2024. None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities or addressed through proposed policies.</p> <p>No change proposed.</p>
Harris, P	RES24-096-01	Policy SA3	<p>Believes the publication plan is unsound and may not be legally compliant and ask for it to be deleted. The land is good productive farmland. It is very pleasant countryside. The type that is being lost as an alarming rate. There is an abundance of wildlife including deer, badgers, fox, bats etc</p>	No	No	No	<p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district's agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p> <p>Landscape sensitivity has been assessed through the Landscape Sensitivity Study. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that better perform as sustainable allocations. Any future planning application would be expected to address Policy NB4 – which the council has included as a proposed policy in the plan – insofar as the design and location of new development should take account of the characteristics and sensitivity of the landscape and its surroundings, including not having a detrimental impact upon any medium or long-distance views.</p> <p>The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact on habitats sites.</p>

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							No change proposed.
Corcoran, O	RES24-046-01	Policy SA3	<p>Stafford did an analysis of all perimeter borders the site was deemed not viable due to No school Places Lack of medical facilities (only one doctors surgery).</p> <p>Finds plan unsound for following reasons:</p> <p>Page 13 reliance of site on Stafford Borough Council not south staffs</p> <p>Page 19 site is graded 3 a (growing potatoes last 50 years)</p> <p>Page 22 not via to support tourism and agriculture</p> <p>Page 25 violates Cannock Chase wildlife as deer use the woodland of the site edges.</p> <p>Page 26 destroys open countryside and assist in delivering sustainable family enterprise</p> <p>Page 99 Health requirements will fall on overloaded Stafford Borough for this area.</p> <p>Page 134 Damages as opposed to protecting enhancing and expanding natural assets.</p>	Not stated	No	No	<p>Any assessment by Stafford Borough Council will have been on sites within their administrative area.</p> <p>Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies as set out in the Housing Site Selection Topic Paper 2024. None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities or addressed through proposed policies.</p> <p>Although the site allocation is located adjacent to Stafford town, as a small urban extension, the site option performs better than other site options as set out in the Housing Site Selection Topic Paper 2024.</p> <p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district's agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p> <p>The Strategic Objectives set out on page 22 are plan-wide aims, and each site would contribute to some more than others.</p> <p>The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact on habitats sites.</p> <p>Allocation of the site will remove it from designation as Open Countryside and therefore</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							<p>Policy DS3 would not apply. Once removed from the open countryside, there will not be a requirement to conform to Policy DS3 but rather the relevant DM policies that are applicable.</p> <p>No change proposed.</p>
Singleton, D	RES24-215-01	Policy SA3	<p>Comments in relation to Para 5.7, pages 25 - 27, site ref: 036C on page 235. Objection to the allocation in relation to Policy DS3 - Open Countryside.</p> <p>The development is in the wrong place, as it is proposed on highly productive agricultural land, defined as 'open countryside'. A development in this location would not comply with the criteria outlined in Policy DS3.</p> <p>Stafford Borough Council object to this site and therefore this element fails the duty to co-operate.</p> <p>Strain on local infrastructure, such as health, education and transport. Acton Hill Lane is single track with passing places, and is unsuitable for traffic from this development.</p>	No	No	No	<p>Allocation of the site will remove it from designation as Open Countryside and therefore Policy DS3 would not apply. Once removed from the open countryside, there will not be a requirement to conform to Policy DS3 but rather the relevant DM policies that are applicable.</p> <p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district's agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations. Stafford Borough Council (SBC) and SSDC have an agreed SoCG that addresses Duty to Cooperate matters effectively that both parties consider to be sound and lawful as set out in the Duty to Cooperate Topic Paper 2024.</p> <p>Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies as set out in the Housing Site Selection Topic Paper 2024. None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities or addressed through proposed policies.</p> <p>No change proposed.</p>
Singleton, D	RES24-215-02	Policy SA3	<p>Comments in relation to Para 5.60, pages 46 and 47, site ref: 036C on page 235. Objection to the allocation in relation to Policy DS4 - Development Needs.</p> <p>The Plan exceeds the required housing numbers without including this development site, so it is unnecessary and unjustified.</p>	No	No	No	<p>The Council has included a buffer in housing supply above its proposed requirement which will provide around 10% plan flexibility (as set out in Policy DS4) to allow for any uncertainties around site delivery.</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>The position of the site would extend the town of Stafford, rather than being a development which extends built areas within South Staffordshire. It is remote in relation to the economic development area of South Staffordshire. Future residents would focus on Stafford for their local services.</p> <p>Acton Hill Lane is a single track with passing places, and is unsuitable for traffic from this development.</p> <p>The development is not positively prepared in the context of a South Staffordshire development.</p> <p>Comments in relation to Para 5.61, pages 47 - 50, site ref: 036C on page 235. Objection to the allocation in relation to Policy DS5 - Spatial Strategy.</p> <p>The development 036C on land to the south of Stafford is unjustified as it is not in a "sustainable location".</p> <p>The site is prime agricultural land and building on it would erode the rural character of South Staffordshire, and erode the buffer of countryside which separates Stafford from surrounding villages. As such, allocation of this site is contrary to DS5 by failing "to maintain and enhance the natural and historic environment".</p> <p>Comments in relation to Paras 12.13 - 12.15, pages 139 - 140, site ref: 036C on page 235. Objection to the allocation in relation to Policy NB3 - Cannock Chase SAC.</p> <p>The site allocation 036C is within the 15km zone of influence around Cannock Chase, so contravenes Policy NB3.</p> <p>Paragraph 12.13 of the Plan provides independent evidence that and proposed new housing within the 15km zone "is likely to have a significant effect" in terms of increased visitor numbers to the Chase.</p> <p>Paragraph 12.14 outlines a legal duty for the Council to ensure appropriate mitigation measures for developments within the 15km zone of influence around the Cannock Chase SAC. No such mitigation measures are identified in the Plan and therefore I conclude that this development is neither sound nor legally compliant.</p>				<p>Although the site allocation is located adjacent to Stafford town, as a small urban extension, the site option performs better than other site options as set out in the Housing Site Selection Topic Paper 2024. As a small urban extension, the council does not consider that the proposed allocation of site 036c will have a negative impact upon the separation of Stafford town and the villages/settlements within South Staffordshire District.</p> <p>Engagement throughout plan preparation has taken place with Local Highways Authority (Staffordshire County Council). They have not indicated that [access to the site is problematic or unmitigable] the impact of the proposed allocation would not generate any significant impacts on the transport network or highway safety that cannot be mitigated in line with paragraph 114 d of the NPPF.</p> <p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district's agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p> <p>Any future planning application would be expected to address Policy NB4 insofar as they must conserve and enhance the landscape and scenic beauty of the area and habitats sites and conform with the most up to date SPDs. Any specific developer contributions that are required to mitigate any adverse impacts of development on Cannock Chase SAC will be secured at the point of a planning application approval. The council considers that the mechanism to secure such a financial contribution is through Policy NB3 is satisfactory.</p> <p>No change proposed.</p>



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Edgeller, A (Cllr)	STA24-017-01	Policy SA3	036C - Stafford Borough did analysis of all perimeter borders. Site is not viable due to a) no school places, b) only 1 doctors unit, c) inability for the site to be sustained via Stafford Borough. Pages 13, 21, 22 objectives 7, 8, 9 and 10 and Policy HC14 will all fall under Stafford Borough Council rather than South Staffs. The site is graded 3A and has been growing potatoes for 50 years - it is prime farmland. Violates Cannock Chase wildlife as deer use the woodland on the site edges and contrary to Policy N31 and page 25.	Not stated	No	No	<p>Any assessment by Stafford Borough Council will have been on sites within their administrative area.</p> <p>Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies. Engagement throughout plan preparation has taken place with Local Highways Authority, School Organisation Team (SOT) (both Staffordshire County Council), and Staffordshire and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical Commissioning Group). None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities, or addressed through proposed Policies HC14, and HC15.</p> <p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district's agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p> <p>The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact on habitats sites.</p> <p>No change proposed.</p>
Stafford Borough Council	STA24-043-01	Policy SA3	Development to the south of Stafford Town settlement boundary would be in the immediate setting of the National Landscape and lead to a detrimental impact on Cannock Chase so should not go ahead. Reference to avoiding detrimental impacts, and conserving and enhancing Cannock Chase National Landscape (AONB), and it's setting, for its landscape and natural beauty and the services it provides indirectly as a result of its special	Yes	No	Yes	<p>Landscape impacts have been considered through the Landscape Sensitivity Study 2019. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that better perform as sustainable allocations. Any future planning application would be expected to address Policy</p>

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			<p>qualities should be sought through the South Staffordshire Local Plan 2023-2041 to reflect guidance in the AONB Management Plan, as well as the Views and Settings Guide.</p> <p>The AONB Management Plan 2019-24 emphasises the importance of maintaining the quality and distinctiveness of the landscape character of Cannock Chase. It calls for new development to be of the highest quality befitting one of the nation’s finest landscapes, and for unsuitable new development to be resisted.</p> <p>Site 036c would not appear to accord with Strategic Objective 2 of the New Local Plan Publication as a sustainable approach to meeting the needs of the GBBCHMA. This location is less sustainable and deliverable than other sites in South Staffordshire.</p> <p>Stafford Borough is not relying on South Staffordshire District’s Local Plan to meet any of its housing need. Therefore, reference to this new development should not have been included in the New Local Plan, including reference in Policy DS5, Policy SA5 and the proforma in Appendix C on page 235.</p> <p>Site Reference 036C Such a development does not demonstrate it would provide appropriate infrastructure to mitigate the impact. There is no relationship to the existing urban form. The site is remote from any settlement or services in South Staffordshire, with the occupiers of the development looking to Stafford Town to provide their services. Accordingly this will impact on schools and leisure provision in Stafford, which have a number of capacity issues. To date further details have not been provided to demonstrate the following, with limited information in the latest Infrastructure Delivery Plan published alongside the Local Plan consultation: that education impacts in Stafford Borough can be acceptably mitigated; that contributions to meeting Stafford Town’s affordable housing need and providing for leisure facilities in Stafford would be secured; and that impacts on the landscape, including the setting of the Cannock Chase National Landscape, formerly the Area of Outstanding Natural Beauty (AONB), would be acceptable. The Stafford Borough Economic Housing Development Needs Assessment, on page 164 within Table 12.1 sets out a figure of 208 new affordable homes required for Stafford Town. Therefore</p>				<p>NB4 (Landscape Character) – which the council has included as a proposed policy in the plan – insofar as the design and location of new development should take account of the characteristics and sensitivity of the landscape and its surroundings, including not having a detrimental impact upon any medium or long-distance views. This will be considered through the detailed design considerations by the development management process as and when a planning application for the site is submitted.</p> <p>Site is not explicitly meeting cross boundary needs but contributing to meeting the districts housing requirement as a whole and contributing to meeting Strategic Objective 2. SSDC has had to identify all suitable non-Green Belt sites as part of demonstrating exceptional circumstances, and site 036c has been identified as suitable through the Housing Site Assessment Topic Paper 2024.</p> <p>South Staffordshire has its own affordable housing requirement as identified in the Strategic Housing Market Assessment and set out in the Affordable Housing and Housing Mix Topic Paper 2024. All proposed housing allocations, including site 036c, will contribute to meeting the districts’ affordable housing need.</p> <p>No change proposed.</p>

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			through the Duty to Co-operate process the Borough Council looks forward to receiving confirmation that the affordable housing provided by this site, if adopted within the Local Plan, will make its contribution of 24 new homes to the Stafford Town affordable housing need.				
Gladman Developments Ltd	AGT24-019-01-01	Policy SA3	<p>Land at Weeping Cross (Site 036c) is supported by Gladman and soundly responds to the emerging spatial strategy which directs growth to the most sustainable locations in the District. The explicit reference to minimum capacity of 81 dwellings is supported. The site is in a sustainable location to accommodate growth adjoining an already established community in the town of Stafford. The site has good access to facilities and community infrastructure and can deliver approximately 100 high quality homes. The site will deliver green infrastructure and provide an active travel link to services and facilities at Weeping Cross.</p> <p>We consider that the allocation is sound but the potential for development should be maximised at this location, and thus we are of the view the allocation for a minimum of 168 dwellings, as set out in the Preferred Options Plan, should be reinstated. Technical note on potential heritage impacts confirms that any harm to the non-designated heritage asset would be minimal at most.</p>	Not stated	No	No	<p>Support for the sites inclusion with the plan is noted.</p> <p>The capacity identified within the site proforma for this proposed allocation is a 'minimum' of 81 dwellings. This is based on the assessment of the site and further details provided through the Housing Site Assessment Topic Paper 2024. As such, it is not considered necessary to increase the capacity of the site.</p> <p>No change proposed.</p>
Windsor, R	RES24-255-04	Policy SA3	<p>Site ref: 036c. Plan is unsound, as the description of the site being at Weeping Cross is misleading actual location should be described as Acton Hill. Lack of duty to co-operate with Stafford Borough Council.</p>	Not stated	No	No	<p>Comment noted.</p> <p>Stafford Borough Council (SBC) and SSDC have an agreed SoCG that addresses Duty to Cooperate matters effectively that both parties consider to be sound and lawful as set out in the Duty to Cooperate Topic Paper 2024.</p> <p>No change proposed.</p>
Glover, E	RES24-085-01	Policy SA3	<p>No co-operation, so duty to co-operate has not been complied with. Statements in the plan which go against the justification for the development, which have been ignored, therefore the plan is not legally compliant. Inclusion of site 036c is unsound and not legally compliant: 036c does not comply with Policy DS3 Open Countryside. DS3 states sites would be dealt with on a case-by-case basis, avoiding best and most versatile land. The site comes under best and most versatile land, and therefore contradicts the policy. Paragraph 5.28 - Southern Edge of Stafford (A34 Corridor) states why this piece of land should not be developed. It gives good and supportable reasons for the decision.</p>	No	No	No	<p>Stafford Borough Council (SBC) and SSDC have an agreed SoCG that addresses Duty to Cooperate matters effectively that both parties consider to be sound and lawful as set out in the Duty to Cooperate Topic Paper 2024.</p> <p>Allocation of the site will remove it from designation as Open Countryside and therefore Policy DS3 would not apply. Once removed from the open countryside, there will not be a requirement to conform to Policy DS3 but rather the relevant DM policies that are applicable.</p> <p>Best and Most Versatile agricultural land has</p>

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			<p>Paragraph 5.28 refers to a small section of non-Green Belt housing land for development. It fails to mention that is proposed development under 036c and is best and most versatile agricultural land.</p> <p>The plan is not positively prepared, and does not take into account local opinion.</p> <p>Development of 036c is not justified or effective, because it is isolate from the District's other communities.</p>				<p>been considered through the Sustainability Appraisal. The majority of the district's agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p> <p>The council considers that all proposed allocations comply with the NPPF and the spatial strategy (identified in Policy DS5) insofar as they are located to deliver sustainable patterns of development that are distributed across the district on strategic planning matters and meet the authorities' identified housing need.</p> <p>The council has undertaken a number of consultation exercises as local plan preparation has progressed as per legislation. Residents and all other stakeholders have been given the opportunity to provide their input into the plan making process, and these views have been reflected as far as possible in each iteration of the plan as it has developed.</p> <p>The site allocation is located adjacent to Stafford town and is not an isolated rural settlement as it is located adjacent to Stafford town where community facilities and other services and infrastructure are available.</p> <p>No change proposed.</p>
Moore, T	RES24-154-01	Policy SA3	<p>In relation to site ref: 036c and Policy DS3 Open Countryside. In respect of policy DS3, site 036c fails all 3 elements of this policy.</p> <p>Legal Compliance: The site fails NPPF December 2023. The land is productive farmland classified by SSDC. It is classic rolling countryside. Noted for its diversity of wildlife. Housing in the wrong location. Not addressed design standards or heritage assets. Landscaping, recreational assets, housing mix requirement not met.</p>	No	No	No	<p>Allocation of the site will remove it from designation as Open Countryside and therefore Policy DS3 would not apply. Once removed from the open countryside, there will not be a requirement to conform to Policy DS3 but rather the relevant DM policies that are applicable.</p> <p>The council considers that all proposed allocations comply with the NPPF and the spatial strategy (identified in Policy DS5) insofar as they are located to deliver sustainable patterns of development that are distributed across the district on strategic planning matters and meet</p>

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			<p>There is no unmet housing need. Local schools are full. The land is within the Cannock Chase SAC and there is no evidence the plan takes this into account. Damage to the environment cannot be mitigated. Effect of increased traffic in local villages.</p>				<p>the authorities' identified housing need.</p> <p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district's agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p> <p>Landscape sensitivity has been assessed through the Landscape Sensitivity Study. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that better perform as sustainable allocations. Any future planning application would be expected to address Policy NB4.</p> <p>The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact on habitats sites. Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>All site-specific design considerations and housing mix will be assessed in detail at the point of determining any future planning application. At this time, the council considers Policy HC10 (Design Requirements) and HC1 (Housing Mix) sufficient to ensure all development meets appropriate requirements.</p> <p>The impact upon the historic environment has been assessed on a site-by-site basis through the preparation of a Historic Environment Site Assessment (HESA) which has informed the site selection process. Site 036c was identified in the</p>



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							<p>HESA as 'amber' for predicted impact on the historic environment meaning that there are no significant effects that cannot be mitigated. Nevertheless, only the northern portion of the wider site parcel has been proposed for allocation as recommended in the HESA.</p> <p>A range of evidence pertaining to open space, sport, and recreation has been produced to inform the preparation of the local plan both in regard to draft policies (specifically HC17 Open Space, and HC18 Sports Facilities and Playing Pitches) and proposed site allocations. In short, recreation facilities/infrastructure has a minimal evidenced shortfall which nevertheless can be rectified through improved quality and access to existing provision</p> <p>Any oversupply that may have been delivered by Stafford is not a relevant consideration when preparing the plan for South Staffordshire as it is a different HMA.</p> <p>Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies as set out in the Housing Site Selection Topic Paper 2024. None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities or addressed through proposed policies.</p> <p>No change proposed.</p>
Fisher, G	RES24-068-01	Policy SA3	<p>With respect to site 036c the plan is unsound and may not be legally compliant. The duty to co-operate has not been carried out with Stafford Borough Council.</p> <p>Is it legally compliant:</p> <ul style="list-style-type: none"> <li>- The site fails the NPPF 2023 chapter 15 - Conserving and enhancing the natural environment.</li> <li>- The land is productive farmland, being grade 3 and grade 2 towards Acton Trussell.</li> <li>- It is classical rolling countryside providing an excellent vista from the Wildwood development and the A34 SE of Stafford.</li> <li>- The site is noted for its diversity of wildlife. 34 species of bird are seen on a regular basis, along with deer, badgers, bats and hares.</li> <li>- It is an important biodiversity link between Cannock Chase</li> </ul>	No	No	No	<p>Stafford Borough Council (SBC) and SSDC have an agreed SoCG that addresses Duty to Cooperate matters effectively that both parties consider to be sound and lawful as set out in the Duty to Cooperate Topic Paper 2024.</p> <p>The council considers that all proposed allocations comply with the NPPF and the spatial strategy (identified in Policy DS5) insofar as they are located to deliver sustainable patterns of development that are distributed across the district on strategic planning matters and meet the authorities' identified housing need.</p> <p>Best and Most Versatile agricultural land has</p>

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			<p>AONB and the canal and river Penk Valley.</p> <ul style="list-style-type: none"> <li>- The proposal does not meet the objectives outlined within Policy DS3 of the plan.</li> <li>- The property and adjacent Farm, which will be endangered by this and likely future development that follows it, are part of the historic Earls if Lichfield land.</li> <li>- Development strategy, design standards, landscape, heritage, ecology, biodiversity, recreation assets, housing mix requirements and sustainable travel have not been met in line with policy.</li> </ul> <p>The expressed reason for the use of this land within the plan is that it is not in the Green Belt. This may be justified if the 81 houses were necessary.</p> <p>Clause 5.28 of the plan makes clear there is no 'unmet housing need',</p> <p>Comments on HC15, the site was rated as a major positive in respect of education, but this does not take into account that local schools are confirmed as full.</p> <p>The land is within the SAC of Cannock Chase. There is no evidence this has been taken into account, and conflicts with the SDC SAC Cannock Chase Guidance to mitigate the impact of new residential development (March 2022).</p> <p>The site 036c is an important part of the continuity of Open Countryside between Cannock Chase AONB and the important Valley of the River Penk.</p> <p>Mitigation, as permitted by the SAC, will be unable to mitigate the impact on wildlife movements between these important sites South of Stafford.</p> <p>Any suggestions that the damage to environment can be mitigated by 'diversity of domestic gardens' or financial mitigation to Cannock Chase AONB are derisory.</p> <p>If the plan is required to deliver the number of houses suggested, they should be placed a greater distance from Stafford, such as Cheslyn Hay, Great Wyrley, Codsall, Bilbrook, or sites further south in South Staffordshire.</p> <p>SSDC plan does not make any allowances for 'in migration' like SBC have.</p> <p>The Government, through the NPPF, has stated that local authorities should provide for the locally assessed requirements of their area. Pressures for continued in-migration are likely to remain from neighbouring areas in the short to medium term.</p> <p>An obvious conclusion is that site 036c is unnecessary and surplus to reasonable requirements.</p>				<p>been considered through the Sustainability Appraisal. The majority of the district's agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p> <p>Landscape sensitivity has been assessed through the Landscape Sensitivity Study. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that better perform as sustainable allocations. Any future planning application would be expected to address Policy NB4.</p> <p>Landscape sensitivity has been assessed through the Landscape Sensitivity Study. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that better perform as sustainable allocations. Any future planning application would be expected to address Policy NB4.</p> <p>Allocation of the site will remove it from designation as Open Countryside and therefore Policy DS3 would not apply. Once removed from the open countryside, there will not be a requirement to conform to Policy DS3 but rather the relevant DM policies that are applicable. Future development</p> <p>All site-specific design considerations, recreation provisions, sustainable transport, and housing mix will be assessed in detail at the point of determining any future planning application. At this time, the council considers Policy HC10 (Design Requirements), HC17 (Open Space) and HC18 (Sports Facilities and Playing Pitches), EC12 (sustainable transport) and HC1 (Housing Mix) sufficient to ensure all development meets appropriate requirements.</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							<p>The council has sought to maximise the development opportunities on sites outside of the Green Belt in the first instance, this includes site 036c located within Open Countryside, before identifying Green Belt sites. This approach is in conformity with paragraphs 146 and 147 of the NPPF.</p> <p>The Council has applied the Standard Method formula as set out in the NPPF when arriving at our Local Housing Need between 2023 and 2041 of 4086 dwellings, equating to 227 dwellings per annum. There is no requirement to factor in 'in-migration' over and above this. Any oversupply that may have been delivered by Stafford, or alternative approaches made to identifying a housing requirement, are not relevant considerations when preparing the plan for South Staffordshire as it is a different HMA.</p> <p>Engagement throughout plan preparation has taken place with the School Organisation Team (SOT) at Staffordshire County Council. They have not indicated that the impact of the proposed allocation is incapable of being mitigated through financial contributions in line with Policy HC15.</p> <p>Any specific developer contributions that are required to mitigate any adverse impacts of development on Cannock Chase SAC will be secured at the point of a planning application approval. The council considers that the mechanism to secure such a financial contribution is through Policy NB3 is satisfactory.</p> <p>No change proposed.</p>
Woolley, R	RES24-259-01	Policy SA3	<p>With respect to site 036c the plan is unsound and may not be legally compliant. The duty to co-operate has not been carried out with Stafford Borough Council.</p> <p>Is it legally compliant:</p> <ul style="list-style-type: none"> <li>- The site fails the NPPF 2023 chapter 15.</li> <li>- The land is productive farmland, being grade 3 and grade 2 towards Acton Trussell.</li> <li>- It is classical rolling countryside providing an excellent vista from the Wildwood development and the A34 SE of Stafford.</li> <li>- The site is noted for its diversity of wildlife. 34 species of bird are seen on a regular basis, along with deer, badgers, bats and</li> </ul>	No	No	No	<p>Refer to above response.</p> <p>No change proposed.</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>hares.</p> <ul style="list-style-type: none"> <li>- It is an important biodiversity link between Cannock Chase AONB and the canal and river Penk Valley.</li> <li>- The proposal does not meet the objectives outlined within Policy DS3 of the plan.</li> <li>- The property and adjacent Farm, which will be endangered by this and likely future development that follows it, are part of the historic Earls of Lichfield land.</li> <li>- Development strategy, design standards, landscape, heritage, ecology, biodiversity, recreation assets, housing mix requirements and sustainable travel have not been met in line with policy.</li> </ul> <p>The expressed reason for the use of this land within the plan is that it is not in the Green Belt. This may be justified if the 81 houses were necessary.</p> <p>Clause 5.28 of the plan makes clear there is no 'unmet housing need'.</p> <p>Whether the SSDC Plan has appropriately recognised provision of houses by SBC for neighbouring authorities, and thus if the Plan numbers are actually necessary or justified, elsewhere.</p> <p>Comments on HC15, the site was rated as a major positive in respect of education, but this does not take into account that local schools are confirmed as full.</p> <p>The land is within the SAC of Cannock Chase. There is no evidence this has been taken into account, and conflicts with the SDC SAC Cannock Chase Guidance to mitigate the impact of new residential development (March 2022).</p> <p>The site 036c is an important part of the continuity of Open Countryside between Cannock Chase AONB and the important Valley of the River Penk.</p> <p>Mitigation, as permitted by the SAC, will be unable to mitigate the impact on wildlife movements between these important sites South of Stafford.</p> <p>Any suggestions that the damage to environment can be mitigated by 'diversity of domestic gardens' or financial mitigation to Cannock Chase AONB are derisory.</p> <p>This is one of the closest sites to Cannock Chase AONB.</p> <p>The choice of site 036c is illogical / unsound in terms of localised housing need.</p> <p>If the plan is required to deliver the number of houses suggested, they should be placed a greater distance from</p>				

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>Stafford, such as Cheslyn Hay, Great Wyrley, Codsall, Bilbrook, or sites further south in South Staffordshire.</p> <p>SSDC plan does not make any allowances for 'in migration' like SBC have.</p> <p>The Government, through the NPPF, has stated that local authorities should provide for the locally assessed requirements of their area. Pressures for continued in-migration are likely to remain from neighbouring areas in the short to medium term.</p> <p>An obvious conclusion is that site 036c is unnecessary and surplus to reasonable requirements. I ask the Inspector to address this matter in particular.</p>				
Evanson, D	RES24-064-01	Policy SA3	<p>With respect to site 036c the plan is unsound and may not be legally compliant. The duty to co-operate has not been carried out with Stafford Borough Council.</p> <p>Is it legally compliant:</p> <ul style="list-style-type: none"> <li>- The site fails the NPPF 2023 chapter 15.</li> <li>- The land is productive farmland, being grade 3 and grade 2 towards Acton Trussell.</li> <li>- It is classical rolling countryside providing an excellent vista from the Wildwood development and the A34 SE of Stafford.</li> <li>- The site is noted for its diversity of wildlife. 34 species of bird are seen on a regular basis, along with deer, badgers, bats and hares.</li> <li>- It is an important biodiversity link between Cannock Chase AONB and the canal and river Penk Valley.</li> <li>- The proposal does not meet the objectives outlined within Policy DS3 of the plan.</li> <li>- The property and adjacent Farm, which will be endangered by this and likely future development that follows it, are part of the historic Earls of Lichfield land.</li> <li>- Development strategy, design standards, landscape, heritage, ecology, biodiversity, recreation assets, housing mix requirements and sustainable travel have not been met in line with policy.</li> </ul> <p>The expressed reason for the use of this land within the plan is that it is not in the Green Belt. This may be justified if the 81 houses were necessary.</p> <p>Clause 5.28 of the plan makes clear there is no 'unmet housing</p>	No	No	No	<p>Refer to above response.</p> <p>No change proposed.</p>



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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>need'.</p> <p>Whether the SSDC Plan has appropriately recognised provision of houses by SBC for neighbouring authorities, and thus if the Plan numbers are actually necessary or justified, elsewhere.</p> <p>Comments on HC15, the site was rated as a major positive in respect of education, but this does not take into account that local schools are confirmed as full.</p> <p>The land is within the SAC of Cannock Chase. There is no evidence this has been taken into account, and conflicts with the SDC SAC Cannock Chase Guidance to mitigate the impact of new residential development (March 2022).</p> <p>The site 036c is an important part of the continuity of Open Countryside between Cannock Chase AONB and the important Valley of the River Penk.</p> <p>Mitigation, as permitted by the SAC, will be unable to mitigate the impact on wildlife movements between these important sites South of Stafford.</p> <p>Any suggestions that the damage to environment can be mitigated by 'diversity of domestic gardens' or financial mitigation to Cannock Chase AONB are derisory.</p> <p>This is one of the closest sites to Cannock Chase AONB.</p> <p>The choice of site 036c is illogical / unsound in terms of localised housing need.</p> <p>If the plan is required to deliver the number of houses suggested, they should be placed a greater distance from Stafford, such as Cheslyn Hay, Great Wyrley, Codsall, Bilbrook, or sites further south in South Staffordshire.</p> <p>SSDC plan does not make any allowances for 'in migration' like SBC have. The Government, through the NPPF, has stated that local authorities should provide for the locally assessed requirements of their area. Pressures for continued in-migration are likely to remain from neighbouring areas in the short to medium term.</p> <p>An obvious conclusion is that site 036c is unnecessary and surplus to reasonable requirements. I ask the Inspector to</p>				

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			address this matter in particular.				
Parrott, A	RES24-166-01	Policy SA3	<p>With respect to site 036c the plan is unsound and may not be legally compliant. The duty to co-operate has not been carried out with Stafford Borough Council.</p> <p>Is it legally compliant:</p> <ul style="list-style-type: none"> <li>- The site fails the NPPF 2023 chapter 15.</li> <li>- The land is productive farmland, being grade 3 and grade 2 towards Acton Trussell.</li> <li>- It is classical rolling countryside providing an excellent vista from the Wildwood development and the A34 SE of Stafford.</li> <li>- The site is noted for its diversity of wildlife. 34 species of bird are seen on a regular basis, along with deer, badgers, bats and hares.</li> <li>- It is an important biodiversity link between Cannock Chase AONB and the canal and river Penk Valley.</li> </ul> <ul style="list-style-type: none"> <li>- The proposal does not meet the objectives outlined within Policy DS3 of the plan.</li> <li>- The property and adjacent Farm, which will be endangered by this and likely future development that follows it, are part of the historic Earls of Lichfield land.</li> <li>- Development strategy, design standards, landscape, heritage, ecology, biodiversity, recreation assets, housing mix requirements and sustainable travel have not been met in line with policy.</li> </ul> <p>The expressed reason for the use of this land within the plan is that it is not in the Green Belt. This may be justified if the 81 houses were necessary.</p> <p>Clause 5.28 of the plan makes clear there is no 'unmet housing need'.</p> <p>Whether the SSDC Plan has appropriately recognised provision of houses by SBC for neighbouring authorities, and thus if the Plan numbers are actually necessary or justified, elsewhere.</p> <p>Comments on HC15, the site was rated as a major positive in respect of education, but this does not take into account that local schools are confirmed as full.</p> <p>The land is within the SAC of Cannock Chase. There is no evidence this has been taken into account, and conflicts with the SDC SAC Cannock Chase Guidance to mitigate the impact of new</p>	No	No	No	<p>Refer to above response.</p> <p>No change proposed.</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>residential development (March 2022).</p> <p>The site 036c is an important part of the continuity of Open Countryside between Cannock Chase AONB and the important Valley of the River Penk.</p> <p>Mitigation, as permitted by the SAC, will be unable to mitigate the impact on wildlife movements between these important sites South of Stafford.</p> <p>Any suggestions that the damage to environment can be mitigated by 'diversity of domestic gardens' or financial mitigation to Cannock Chase AONB are derisory.</p> <p>This is one of the closest sites to Cannock Chase AONB.</p> <p>The choice of site 036c is illogical / unsound in terms of localised housing need.</p> <p>If the plan is required to deliver the number of houses suggested, they should be placed a greater distance from Stafford, such as Cheslyn Hay, Great Wyrley, Codsall, Bilbrook, or sites further south in South Staffordshire.</p> <p>SSDC plan does not make any allowances for 'in migration' like SBC have. The Government, through the NPPF, has stated that local authorities should provide for the locally assessed requirements of their area. Pressures for continued in-migration are likely to remain from neighbouring areas in the short to medium term.</p> <p>An obvious conclusion is that site 036c is unnecessary and surplus to reasonable requirements. I ask the Inspector to address this matter in particular.</p>				
Parrott, S	RES24-169-01	Policy SA3	<ul style="list-style-type: none"> <li>- The site is noted for its diversity of wildlife. 34 species of bird are seen on a regular basis, along with deer, badgers, bats and hares.</li> <li>- It is an important biodiversity link between Cannock Chase AONB and the canal and river Penk Valley.</li> <li>- The proposal does not meet the objectives outlined within Policy DS3 of the plan.</li> <li>- The property and adjacent Farm, which will be endangered by this and likely future development that follows it, are part of the historic Earls of Lichfield land.</li> </ul>	No	No	No	<p>Refer to above response.</p> <p>No change proposed.</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>- Development strategy, design standards, landscape, heritage, ecology, biodiversity, recreation assets, housing mix requirements and sustainable travel have not been met in line with policy.</p> <p>The expressed reason for the use of this land within the plan is that it is not in the Green Belt. This may be justified if the 81 houses were necessary.</p> <p>Clause 5.28 of the plan makes clear there is no 'unmet housing need'.</p> <p>Whether the SSDC Plan has appropriately recognised provision of houses by SBC for neighbouring authorities, and thus if the Plan numbers are actually necessary or justified, elsewhere.</p> <p>Comments on HC15, the site was rated as a major positive in respect of education, but this does not take into account that local schools are confirmed as full.</p> <p>The land is within the SAC of Cannock Chase. There is no evidence this has been taken into account, and conflicts with the SDC SAC Cannock Chase Guidance to mitigate the impact of new residential development (March 2022).</p> <p>The site 036c is an important part of the continuity of Open Countryside between Cannock Chase AONB and the important Valley of the River Penk.</p> <p>Mitigation, as permitted by the SAC, will be unable to mitigate the impact on wildlife movements between these important sites South of Stafford.</p> <p>Any suggestions that the damage to environment can be mitigated by 'diversity of domestic gardens' or financial mitigation to Cannock Chase AONB are derisory.</p> <p>This is one of the closest sites to Cannock Chase AONB.</p> <p>The choice of site 036c is illogical / unsound in terms of localised housing need.</p> <p>If the plan is required to deliver the number of houses suggested, they should be placed a greater distance from Stafford, such as Cheslyn Hay, Great Wyrley, Codsall, Bilbrook, or sites further south in South Staffordshire.</p>				

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>SSDC plan does not make any allowances for 'in migration' like SBC have. The Government, through the NPPF, has stated that local authorities should provide for the locally assessed requirements of their area. Pressures for continued in-migration are likely to remain from neighbouring areas in the short to medium term.</p> <p>An obvious conclusion is that site 036c is unnecessary and surplus to reasonable requirements. I ask the Inspector to address this matter in particular.</p>				
Pugh, M	RES24-189-01	Policy SA3	<p>With respect to site 036c the plan is unsound and may not be legally compliant. The duty to co-operate has not been carried out with Stafford Borough Council.</p> <p>Is it legally compliant: The site fails the NPPF 2023 chapter 15 - Conserving and enhancing the natural environment. The land is productive farmland, being grade 3 and grade 2 towards Acton Trussell. It is classical rolling countryside providing an excellent vista from the Wildwood development and the A34 SE of Stafford. The site is noted for its diversity of wildlife. 34 species of bird are seen on a regular basis, along with deer, badgers, bats and hares. It is an important biodiversity link between Cannock Chase AONB and the canal and river Penk Valley.</p>	No	No	No	<p>Stafford Borough Council (SBC) and SSDC have an agreed SoCG that addresses Duty to Cooperate matters effectively that both parties consider to be sound and lawful as set out in the Duty to Cooperate Topic Paper 2024.</p> <p>The council considers that all proposed allocations comply with the NPPF and the spatial strategy (identified in Policy DS5) insofar as they are located to deliver sustainable patterns of development that are distributed across the district on strategic planning matters and meet the authorities' identified housing need.</p> <p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district's agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p> <p>Landscape sensitivity has been assessed through the Landscape Sensitivity Study. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that better perform as sustainable allocations. Any future planning application would be expected to address Policy NB4.</p> <p>The council has commissioned a Habitats</p>



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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							<p>Regulations Assessment (HRA) to screen the plan to identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact on habitats sites.</p> <p>No change proposed.</p>
Whitehouse, R	RES24-252-01	Policy SA3	<p>With respect to site 036c the plan is unsound and may not be legally compliant. The duty to co-operate has not been carried out with Stafford Borough Council.</p> <p>Is it legally compliant:</p> <ul style="list-style-type: none"> <li>- The site fails the NPPF 2023 chapter 15 - Conserving and enhancing the natural environment.</li> <li>- The land is productive farmland, being grade 3 and grade 2 towards Acton Trussell.</li> <li>- It is classical rolling countryside providing an excellent vista from the Wildwood development and the A34 SE of Stafford.</li> <li>- The site is noted for its diversity of wildlife. 34 species of bird are seen on a regular basis, along with deer, badgers, bats and hares.</li> <li>- It is an important biodiversity link between Cannock Chase AONB and the canal and river Penk Valley.</li> <li>- The proposal does not meet the objectives outlined within Policy DS3 of the plan.</li> <li>- The property and adjacent Farm, which will be endangered by this and likely future development that follows it, are part of the historic Earls of Lichfield land.</li> <li>- Development strategy, design standards, landscape, heritage, ecology, biodiversity, recreation assets, housing mix requirements and sustainable travel have not been met in line with policy.</li> <li>- The expressed reason for the use of this land within the plan is that it is not in the Green Belt. This may be justified if the 81 houses were necessary.</li> </ul> <p>Clause 5.28 of the plan makes clear there is no 'unmet housing need'.</p> <p>Whether the SSDC Plan has appropriately recognised provision of houses by SBC for neighbouring authorities, and thus if the Plan numbers are actually necessary or justified, elsewhere.</p> <p>Comments on HC15, the site was rated as a major positive in respect of education, but this does not take into account that local schools are confirmed as full.</p> <p>The land is within the SAC of Cannock Chase. There is no evidence this has been taken into account, and conflicts with the SDC SAC Cannock Chase Guidance.</p>	No	No	No	<p>Stafford Borough Council (SBC) and SSDC have an agreed SoCG that addresses Duty to Cooperate matters effectively that both parties consider to be sound and lawful as set out in the Duty to Cooperate Topic Paper 2024.</p> <p>The council considers that all proposed allocations comply with the NPPF and the spatial strategy (identified in Policy DS5) insofar as they are located to deliver sustainable patterns of development that are distributed across the district on strategic planning matters and meet the authorities' identified housing need.</p> <p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district's agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p> <p>Landscape sensitivity has been assessed through the Landscape Sensitivity Study. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that better perform as sustainable allocations. Any future planning application would be expected to address Policy NB4.</p> <p>The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>Any suggestions that the damage to environment can be mitigated by 'diversity of domestic gardens' or financial mitigation to Cannock Chase AONB are derisory. This is one of the closest sites to Cannock Chase AONB. The choice of site 036c is illogical / unsound in terms of localised housing need. There are significant extant and planned housing developments in the south of Stafford which, whilst providing significant housing availability (negating the need for the 036c site) have also provided excessive demands on local schools and health provisions.</p> <p>Homes should be placed a greater distance from Stafford, such as Cheslyn Hay, Great Wyrley, Codsall, Bilbrook, or sites further south in South Staffordshire.</p> <p>SDC plan does not make any allowances for 'in migration' like SBC have.</p> <p>An obvious conclusion is that site 036c is unnecessary and surplus to reasonable requirements. I ask the Inspector to address this matter in particular.</p> <p>Lower Penkridge Road has sections without pavement, which is dangerous to walk along. Increased traffic will make it more hazardous. Little or no pavement to walk to the community centre. Sections of Cooks Bank is single file. An increase in traffic will result in traffic queues and again an increased danger to pedestrians.</p>				<p>required an appropriate assessment based upon their impact on habitats sites.</p> <p>Allocation of the site will remove it from designation as Open Countryside and therefore Policy DS3 would not apply. Once removed from the open countryside, there will not be a requirement to conform to Policy DS3 but rather the relevant DM policies that are applicable. Future development.</p> <p>The impact upon the historic environment has been assessed on a site-by-site basis through the preparation of a Historic Environment Site Assessment (HESA) which has informed the site selection process. Site 036c was identified in the HESA as 'amber' for predicted impact on the historic environment meaning that there are no significant effects that cannot be mitigated. Nevertheless, only the northern portion of the wider site parcel has been proposed for allocation as recommended in the HESA.</p> <p>All site-specific design considerations, recreation provisions, sustainable transport, and housing mix will be assessed in detail at the point of determining any future planning application. At this time, the council considers Policy HC10 (Design Requirements), HC17 (Open Space) and HC18 (Sports Facilities and Playing Pitches), EC12 (sustainable transport) and HC1 (Housing Mix) sufficient to ensure all development meets appropriate requirements.</p> <p>The council has sought to maximise the development opportunities on sites outside of the Green Belt in the first instance, this includes site 036c located within Open Countryside, before identifying Green Belt sites. This approach is in conformity with paragraphs 146 and 147 of the NPPF.</p> <p>The Council has applied the Standard Method formula as set out in the NPPF when arriving at our Local Housing Need between 2023 and 2041 of 4086 dwellings, equating to 227 dwellings per annum. There is no requirement to factor in 'in-migration' over and above this. Any oversupply that may have been delivered by Stafford, or</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							<p>alternative approaches made to identifying a housing requirement, are not relevant considerations when preparing the plan for South Staffordshire as it is a different HMA.</p> <p>Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies as set out in the Housing Site Selection Topic Paper 2024. None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities or addressed through proposed policies.</p> <p>Any specific developer contributions that are required to mitigate any adverse impacts of development on Cannock Chase SAC will be secured at the point of a planning application approval. The council considers that the mechanism to secure such a financial contribution is through Policy NB3 is satisfactory.</p> <p>No change proposed.</p>
Historic England	STA24-023-01	Policy SA3	<p>Site 036c</p> <p>We have concerns regarding this site and comments made in the 2022 HESA report assessing the impacts to heritage assets and historic character. Site 036c appears to have a higher level of impact as scored between an 'amber' and 'red' RAG score. We consider that additional mitigation measures are required in order to protect the existing historic landscape area/non designated parkland landscape/impacts on the setting of the Canal Conservation Area and potential for archaeological finds. The HESA report stated that only part of this site should be allocated due to harm on heritage but it is unclear whether this advice has been taken or not. Site 036a appears to no longer be included within the Plan.</p>	Not stated	Not stated	Not stated	<p>Site 036c was identified in the HESA as 'amber' for predicted impact on the historic environment meaning that there are no significant effects that cannot be mitigated.</p> <p>The northern portion (036c) of the wider site parcel has been proposed for allocation, excluding the wider site parcel to reflect the recommendations in the HESA.</p> <p>No change proposed.</p>
Bryan, J	RES24-026-01	Policy SA3	<p>With respect to site 036c the plan is unsound and may not be legally compliant. The duty to co-operate has not been carried out with Stafford Borough Council.</p> <p>Is it legally compliant:</p> <ul style="list-style-type: none"> <li>- The site fails the NPPF 2023 chapter 15 - Conserving and enhancing the natural environment.</li> <li>- The land is productive farmland, being grade 3 and grade 2 towards Acton Trussell.</li> </ul>	No	No	No	<p>Stafford Borough Council (SBC) and SSDC have an agreed SoCG that addresses Duty to Cooperate matters effectively that both parties consider to be sound and lawful as set out in the Duty to Cooperate Topic Paper 2024.</p> <p>The council considers that all proposed allocations comply with the NPPF and the spatial strategy (identified in Policy DS5) insofar as they</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<ul style="list-style-type: none"> <li>- It is classical rolling countryside providing an excellent vista from the Wildwood development and the A34 SE of Stafford.</li> <li>- The site is noted for its diversity of wildlife. 34 species of bird are seen on a regular basis, along with deer, badgers, bats and hares.</li> <li>- It is an important biodiversity link between Cannock Chase AONB and the canal and river Penk Valley.</li> <li>- The proposal does not meet the objectives outlined within Policy DS3 of the plan.</li> <li>- The property and adjacent Farm, which will be endangered by this and likely future development that follows it, are part of the historic Earls of Lichfield land.</li> <li>- Development strategy, design standards, landscape, heritage, ecology, biodiversity, recreation assets, housing mix requirements and sustainable travel have not been met in line with policy.</li> <li>- The expressed reason for the use of this land within the plan is that it is not in the Green Belt. This may be justified if the 81 houses were necessary.</li> </ul> <p>Clause 5.28 of the plan makes clear there is no 'unmet housing need'.</p> <p>Whether the SSDC Plan has appropriately recognised provision of houses by SBC for neighbouring authorities, and thus if the Plan numbers are actually necessary or justified, elsewhere.</p> <p>Comments on HC15, the site was rated as a major positive in respect of education, but this does not take into account that local schools are confirmed as full.</p> <p>The land is within the SAC of Cannock Chase. There is no evidence this has been taken into account, and conflicts with the SDC SAC Cannock Chase Guidance.</p> <p>Any suggestions that the damage to environment can be mitigated by 'diversity of domestic gardens' or financial mitigation to Cannock Chase AONB are derisory.</p> <p>This is one of the closest sites to Cannock Chase AONB.</p> <p>The choice of site 036c is illogical / unsound in terms of localised housing need. There are significant extant and planned housing developments in the south of Stafford which, whilst providing significant housing availability (negating the need for the 036c site) have also provided excessive demands on local schools and health provisions.</p> <p>Homes should be placed a greater distance from Stafford, such as Cheslyn Hay, Great Wyrley, Codsall, Bilbrook, or sites further south in South Staffordshire.</p> <p>SDC plan does not make any allowances for 'in migration' like SBC have.</p> <p>An obvious conclusion is that site 036c is unnecessary and</p>				<p>are located to deliver sustainable patterns of development that are distributed across the district on strategic planning matters and meet the authorities' identified housing need.</p> <p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district's agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p> <p>Landscape sensitivity has been assessed through the Landscape Sensitivity Study. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that better perform as sustainable allocations. Any future planning application would be expected to address Policy NB4.</p> <p>The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact on habitats sites.</p> <p>Allocation of the site will remove it from designation as Open Countryside and therefore Policy DS3 would not apply. Once removed from the open countryside, there will not be a requirement to conform to Policy DS3 but rather the relevant DM policies that are applicable. Future development.</p> <p>The impact upon the historic environment has been assessed on a site-by-site basis through the preparation of a Historic Environment Site Assessment (HESA) which has informed the site selection process. Site 036c was identified in the HESA as 'amber' for predicted impact on the</p>

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			<p>surplus to reasonable requirements. I ask the Inspector to address this matter in particular.</p> <p>Lower Penkridge Road has sections without pavement, which is dangerous to walk along. Increased traffic will make it more hazardous. Little or no pavement to walk to the community centre. Sections of Cooks Bank is single file. An increase in traffic will result in traffic queues and again an increased danger to pedestrians.</p>				<p>historic environment meaning that there are no significant effects that cannot be mitigated. Nevertheless, only the northern portion of the wider site parcel has been proposed for allocation as recommended in the HESA.</p> <p>All site-specific design considerations, recreation provisions, sustainable transport, and housing mix will be assessed in detail at the point of determining any future planning application. At this time, the council considers Policy HC10 (Design Requirements), HC17 (Open Space) and HC18 (Sports Facilities and Playing Pitches), EC12 (sustainable transport) and HC1 (Housing Mix) sufficient to ensure all development meets appropriate requirements.</p> <p>The council has sought to maximise the development opportunities on sites outside of the Green Belt in the first instance, this includes site 036c located within Open Countryside, before identifying Green Belt sites. This approach is in conformity with paragraphs 146 and 147 of the NPPF.</p> <p>The Council has applied the Standard Method formula as set out in the NPPF when arriving at our Local Housing Need between 2023 and 2041 of 4086 dwellings, equating to 227 dwellings per annum. There is no requirement to factor in 'in-migration' over and above this. Any oversupply that may have been delivered by Stafford, or alternative approaches made to identifying a housing requirement, are not relevant considerations when preparing the plan for South Staffordshire as it is a different HMA.</p> <p>Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies as set out in the Housing Site Selection Topic Paper 2024. None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities or addressed through proposed policies.</p> <p>Any specific developer contributions that are required to mitigate any adverse impacts of</p>



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							development on Cannock Chase SAC will be secured at the point of a planning application approval. The council considers that the mechanism to secure such a financial contribution is through Policy NB3 is satisfactory.  No change proposed.
Bryan, N	RES24-027-01	Policy SA3	<p>With respect to site 036c the plan is unsound and may not be legally compliant. The duty to co-operate has not been carried out with Stafford Borough Council.</p> <p>Is it legally compliant:</p> <ul style="list-style-type: none"> <li>- The site fails the NPPF 2023 chapter 15 - Conserving and enhancing the natural environment.</li> <li>- The land is productive farmland, being grade 3 and grade 2 towards Acton Trussell.</li> <li>- It is classical rolling countryside providing an excellent vista from the Wildwood development and the A34 SE of Stafford.</li> <li>- The site is noted for its diversity of wildlife. 34 species of bird are seen on a regular basis, along with deer, badgers, bats and hares.</li> <li>- It is an important biodiversity link between Cannock Chase AONB and the canal and river Penk Valley.</li> <li>- The proposal does not meet the objectives outlined within Policy DS3 of the plan.</li> <li>- The property and adjacent Farm, which will be endangered by this and likely future development that follows it, are part of the historic Earls of Lichfield land.</li> <li>- Development strategy, design standards, landscape, heritage, ecology, biodiversity, recreation assets, housing mix requirements and sustainable travel have not been met in line with policy.</li> <li>- The expressed reason for the use of this land within the plan is that it is not in the Green Belt. This may be justified if the 81 houses were necessary.</li> </ul> <p>Clause 5.28 of the plan makes clear there is no 'unmet housing need'.</p> <p>Whether the SDC Plan has appropriately recognised provision of houses by SBC for neighbouring authorities, and thus if the Plan numbers are actually necessary or justified, elsewhere.</p> <p>Comments on HC15, the site was rated as a major positive in respect of education, but this does not take into account that local schools are confirmed as full.</p> <p>The land is within the SAC of Cannock Chase. There is no evidence this has been taken into account, and conflicts with the SDC SAC Cannock Chase Guidance.</p>	No	No	No	Response as above.  No change proposed.

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			<p>Any suggestions that the damage to environment can be mitigated by 'diversity of domestic gardens' or financial mitigation to Cannock Chase AONB are derisory.</p> <p>This is one of the closest sites to Cannock Chase AONB.</p> <p>The choice of site 036c is illogical / unsound in terms of localised housing need. There are significant extant and planned housing developments in the south of Stafford which, whilst providing significant housing availability (negating the need for the 036c site) have also provided excessive demands on local schools and health provisions.</p> <p>Homes should be placed a greater distance from Stafford, such as Cheslyn Hay, Great Wyrley, Codsall, Bilbrook, or sites further south in South Staffordshire.</p> <p>SDC plan does not make any allowances for 'in migration' like SBC have.</p> <p>An obvious conclusion is that site 036c is unnecessary and surplus to reasonable requirements. I ask the Inspector to address this matter in particular.</p> <p>Lower Penkridge Road has sections without pavement, which is dangerous to walk along. Increased traffic will make it more hazardous. Little or no pavement to walk to the community centre. Sections of Cooks Bank is single file. An increase in traffic will result in traffic queues and again an increased danger to pedestrians.</p>				
France, P	RES24-074-01	Policy SA3	<p>With respect to site 036c the plan is unsound and may not be legally compliant. The duty to co-operate has not been carried out with Stafford Borough Council.</p> <p>Is it legally compliant:</p> <ul style="list-style-type: none"> <li>- The site fails the NPPF 2023 chapter 15 - Conserving and enhancing the natural environment.</li> <li>- The land is productive farmland, being grade 3 and grade 2 towards Acton Trussell.</li> <li>- It is classical rolling countryside providing an excellent vista from the Wildwood development and the A34 SE of Stafford.</li> <li>- The site is noted for its diversity of wildlife. 34 species of bird are seen on a regular basis, along with deer, badgers, bats and hares.</li> <li>- It is an important biodiversity link between Cannock Chase AONB and the canal and river Penk Valley.</li> <li>- The proposal does not been the objectives outlined within Policy DS3 of the plan.</li> <li>- The property and adjacent Farm, which will be endangered by this and likely future development that follows it, are part of the historic Earls of Lichfield land.</li> <li>- Development strategy, design standards, landscape, heritage,</li> </ul>	No	No	No	<p>Response as above.</p> <p>No change proposed.</p>

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			<p>ecology, biodiversity, recreation assets, housing mix requirements and sustainable travel have not been met in line with policy.</p> <p>- The expressed reason for the use of this land within the plan is that it is not in the Green Belt. This may be justified if the 81 houses were necessary.</p> <p>Clause 5.28 of the plan makes clear there is no 'unmet housing need'.</p> <p>Whether the SSDC Plan has appropriately recognised provision of houses by SBC for neighbouring authorities, and thus if the Plan numbers are actually necessary or justified, elsewhere.</p> <p>Comments on HC15, the site was rated as a major positive in respect of education, but this does not take into account that local schools are confirmed as full.</p> <p>The land is within the SAC of Cannock Chase. There is no evidence this has been taken into account, and conflicts with the SDC SAC Cannock Chase Guidance.</p> <p>Any suggestions that the damage to environment can be mitigated by 'diversity of domestic gardens' or financial mitigation to Cannock Chase AONB are derisory.</p> <p>This is one of the closest sites to Cannock Chase AONB.</p> <p>The choice of site 036c is illogical / unsound in terms of localised housing need. There are significant extant and planned housing developments in the south of Stafford which, whilst providing significant housing availability (negating the need for the 036c site) have also provided excessive demands on local schools and health provisions.</p> <p>Homes should be placed a greater distance from Stafford, such as Cheslyn Hay, Great Wyrley, Codsall, Bilbrook, or sites further south in South Staffordshire.</p> <p>SDC plan does not make any allowances for 'in migration' like SBC have.</p> <p>An obvious conclusion is that site 036c is unnecessary and surplus to reasonable requirements. I ask the Inspector to address this matter in particular.</p> <p>Lower Penkridge Road has sections without pavement, which is dangerous to walk along. Increased traffic will make it more hazardous. Little or no pavement to walk to the community centre. Sections of Cooks Bank is single file. An increase in traffic will result in traffic queues and again an increased danger to pedestrians.</p>				
Hingley, B	RES24-108-01	Policy SA3	<p>Site 036C.</p> <p>The plan does not comply with the requirement for keeping good agricultural land.</p> <p>The plan would eventually make the ancient village of Acton</p>	No	No	No	<p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district's agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>Trussell part of Stafford. This would be a tragic environmental outcome destroying a rural area enjoyed by all.</p> <p>This plan does not address the increase of traffic between the A34 and Acton Trussell. The harrow road through the village will become a 'rat run'.</p> <p>The plan does not adequately consider the problem of sewerage. Acton Trussell is many feet below the proposed site.</p> <p>The plan does not comply with the duty to co-operate re: schools (Stafford schools are full) and doctors surgeries which are already at maximum capacity.</p>				<p>therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p> <p>The council does not consider that the proposed allocation of site 036c will have a negative impact upon the separation of Stafford town and the villages/settlements within South Staffordshire District. In particular the impact upon the setting or character of Acton Trussell. As a small urban extension, the site option performs better than other site options as set out in the Housing Site Selection Topic Paper 2024.</p> <p>Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies. Engagement throughout plan preparation has taken place with Local Highways Authority, School Organisation Team (SOT) (both Staffordshire County Council), and Staffordshire and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical Commissioning Group). None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities, or addressed through proposed Policies HC14, and HC15.</p> <p>The council has undertaken continual engagement with both Severn Trent Water and South Staffs Water throughout the preparation of the Local Plan, this has culminated in the production of a Water Cycle Study 2020 to identify impacts of draft allocations upon water supply, wastewater collection and treatment and water quality. A copy of the site capacity assessment can be found in the Strategic Flood Risk Assessment and Sequential Test Topic Paper 2024 which indicates none of the proposed housing allocations would have a greater than 'medium' impact.</p> <p>Stafford Borough Council (SBC) and SSDC have an agreed SoCG that addresses Duty to</p>

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							Cooperate matters effectively that both parties consider to be sound and lawful as set out in the Duty to Cooperate Topic Paper 2024.  No change proposed.
Hingley, T	RES24-109-01	Policy SA3	<p>Site 036C.</p> <p>The plan does not comply with the requirement for keeping good agricultural land.</p> <p>The plan would eventually make the ancient village of Acton Trussell part of Stafford. This would be a tragic environmental outcome destroying a rural area enjoyed by all.</p> <p>This plan does not address the increase of traffic between the A34 and Acton Trussell. The harrow road through the village will become a 'rat run'.</p> <p>The plan does not adequately consider the problem of sewerage. Acton Trussell is many feet below the proposed site.</p> <p>The plan does not comply with the duty to co-operate re: schools (Stafford schools are full) and doctors surgeries which are already at maximum capacity.</p>	No	No	No	<p>Response as above.</p> <p>No change proposed.</p>
Sutton, J	RES24-225-01	Policy SA3	<p>Site 036c should be deleted from the Plan.</p> <p>The Plan already provides for more (5,199) than the 2024 target (4,726). There is no need for the proposed 81 dwellings at this location.</p> <p>High quality agricultural land will be used, contrary to the principle of allocating brownfield sites.</p> <p>The increase in traffic down Acton Hill Road - poorly maintained and narrow - is unsustainable.</p> <p>The impact of additional traffic on the residents of Acton Trussell would be detrimental to the environment and potentially dangerous.</p> <p>I understand that Stafford Borough Council and the local Parish Council oppose this proposal.</p>	No	No	No	<p>The Council has included a buffer in housing supply above its proposed requirement which will provide around 10% plan flexibility (as set out in Policy DS4) to allow for any uncertainties around site delivery.</p> <p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district's agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p> <p>Engagement throughout plan preparation has taken place with Local Highways Authority (Staffordshire County Council). They have not indicated that [access to the site is problematic or unmitigable] the impact of the proposed allocation would not generate any significant impacts on the transport network or highway safety that cannot be mitigated in line with paragraph 114 d of the NPPF.</p>



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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							Stafford Borough Council (SBC) and SSDC have an agreed SoCG that addresses Duty to Cooperate matters effectively that both parties consider to be sound and lawful as set out in the Duty to Cooperate Topic Paper 2024.  No change proposed.
Bolton, H	RES24-020-01	Policy SA3	The inclusion of the land at Weeping Cross on the border with Stafford does not support South Staffordshire Council's vision or strategic objectives. It does not comply with objective 1 (protect green belt), 7 (support rural areas as there are no South Staffordshire settlements near the land), and 8 (protect village centres again it is not near a village centre). The development will contribute nothing towards South Staffordshire (other than council tax contributions and housing targets) as residents will naturally look to Stafford. Remove the land at Weeping Cross from the housing allocation list and relocated the 81 dwellings to else where in South Staffordshire where the housing will support South Staffordshire economy. Stafford Borough Council does not need this housing on their border, their housing need is already met within their borough. The inclusion of this land, makes no sense and it not thought out. Inclusion of this land, will lead to further areas of land being put forward for development, ultimately resulting in Stafford reaching Action Trussell.	No	No	No	Any oversupply that may have been delivered by Stafford is not a relevant consideration when preparing the plan for South Staffordshire as it is a different HMA. The justification for proposing site 036c is set out in the Housing Site Assessment Topic Paper 2024. Albeit as a relatively smaller proposed allocation, site 036c will still contribute to meeting the housing needs of South Staffordshire alongside the other residential allocations in the plan.  The council considers that site-specific issues relating to the historic environment will prevent any future development to the south of the proposed allocation.  No change proposed.
Senior, N	RES24-206-01	Policy SA3	036c Land south of Stafford Housing proposal is not sound mainly due to the detrimental impact on local schools and health services (GP surgeries) where no additional capacity will be provided from this development. Furthermore the proposal will lead to further expansion of the Stafford urban area southwards impacting on the neighbouring countryside and particularly the Cannock Chase AONB.	Yes	No	Yes	Engagement throughout plan preparation has taken place with the School Organisation Team (SOT) at Staffordshire County Council. They have not indicated that the impact of the proposed allocation is incapable of being mitigated through financial contributions in line with Policy HC15.  Engagement throughout plan preparation has taken place with Staffordshire and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical Commissioning Group). They have not indicated that the impact of the proposed allocation is incapable of being mitigated through financial contributions in line with Policy HC14.  Engagement throughout plan preparation has taken place with Staffordshire and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical Commissioning Group). They have not indicated that the impact of the proposed allocation is incapable of being

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							<p>mitigated through financial contributions in line with Policy HC14.</p> <p>Development in locations to the northeast of the district towards Cannock Chase National Landscape, have the potential to have a negative effect on the character and/or setting of the National Landscape. Any future planning application would be expected to address Policy NB4 insofar as they must conserve and enhance the landscape and scenic beauty of the area and habitats sites and conform with the most up to date SPDs.</p> <p>No change proposed.</p>
Watt, J	RES24-246-05	Policy SA3	<p>Site 036c – land south of Stafford. Building would destroy open countryside and wildlife, flora and fauna. Deer from nearby Cannock Chase can often be seen looking for extra food during the winter months. More homes means more school places which we don't have. No direct public transport for Doctor's surgery.</p> <p>Site 036c should remain as Open Countryside.</p>	No	No	No	<p>The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact on habitats sites.</p> <p>Engagement throughout plan preparation has taken place with Staffordshire and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical Commissioning Group). They have not indicated that the impact of the proposed allocation is incapable of being mitigated through financial contributions in line with Policy HC14.</p> <p>Engagement throughout plan preparation has taken place with Staffordshire and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical Commissioning Group). They have not indicated that the impact of the proposed allocation is incapable of being mitigated through financial contributions in line with Policy HC14.</p> <p>No change proposed.</p>
Waller, C	RES24-244-01	Policy SA3	<p>Site 036c In 1996 the inspector recommended the land was only suitable if the motorway remained the same, but it has now been widened with 2 extra lanes of traffic Council is failing its duty of care to its residents with this development as will ruin air quality and increase pollution in the</p>	No	No	No	<p>Chapter 7The impact upon air quality from development on designated sites has been considered by partner authorities that has incorporated assessments of the predicted growth in vehicular movements across all site allocations. This includes cumulative impacts. Furthermore, there is only one Air Quality</p>

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			area The extra traffic entering and exiting will cause congestion on the estate and on Cannock Road				Management Area (AQMA) in the district which is located along the A5 between M6 J12 and Cannock (AQMA No.5 Oak Farm) where there are no allocations proposed.  Engagement throughout plan preparation has taken place with Local Highways Authority (Staffordshire County Council). They have not indicated that access to the site is problematic or unmitigable or the impact of the proposed allocation would not generate any significant impacts on the transport network or highway safety that cannot be mitigated in line with paragraph 114 d of the NPPF.  No change proposed.
Winfield, D	RES24-256-01	Policy SA3	Site 036c close proximity to the M6 motorway - far too close. Noise pollution and air pollution from M6 motorway. Inadequate access via Cannock Road. The idea of development is UNSOUND.	No	No	No	Proximity to the motorway acts in the sites' benefit as it enhances the sites' sustainability credentials.  The impact upon air quality from development on designated sites has been considered by partner authorities that has incorporated assessments of the predicted growth in vehicular movements across all site allocations. This includes cumulative impacts. Furthermore, there is only one Air Quality Management Area (AQMA) in the district which is located along the A5 between M6 J12 and Cannock (AQMA No.5 Oak Farm) where there are no allocations proposed.  Engagement throughout plan preparation has taken place with Local Highways Authority (Staffordshire County Council). They have not indicated that access to the site is problematic or unmitigable or the impact of the proposed allocation would not generate any significant impacts on the transport network or highway safety that cannot be mitigated in line with paragraph 114 d of the NPPF.  No change proposed.
Caven, K	RES24-037-05	Policy SA3	Site 036c Building houses on a field which has been formed for many years will not maintain its intrinsic rural character. It will have a detrimental effect on the immediate environment Field also slopes considerably. Hard surfaces are likely to increase water drainage towards the wildwood estate	No	No	No	Landscape sensitivity has been assessed through the Landscape Sensitivity Study. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that better perform as sustainable allocations. Any

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			Development is wrong regarding rural employment, local food production, education, health and transport facilities. Stafford B.C. shouldn't support South staffs needs				<p>future planning application would be expected to address Policy NB4 – which the council has included as a proposed policy in the plan – insofar as the design and location of new development should take account of the characteristics and sensitivity of the landscape and its surroundings.</p> <p>All proposed allocations have been screened by the council against fluvial flood zones to determine unsuitable sites within flood zone 3. Remaining sites have been assessed by the Lead Local Flood Authority (LLFA) to determine sites which presented unmitigable flood risk(s). A level 2 Strategic Flood Risk Assessment (SFRA) was also commissioned to address Environment Agency concerns pertaining to 8 sites, which site 036c was not one. This process is set out in more detail in the Strategic Flood Risk Assessment and Sequential Test Topic Paper 2024.</p> <p>Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies as set out in the Housing Site Selection Topic Paper 2024. None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities or addressed through proposed policies.</p> <p>Albeit as a relatively smaller proposed allocation, site 036c will still contribute to meeting the housing needs of South Staffordshire alongside the other residential allocations in the plan.</p> <p>No change proposed.</p>
Clare-Hay, A	RES24-041-02	Policy SA3	<p>Site 036c Land is productive farmland classified as grade 2/3 which means it cannot be built upon It is classic rolling countryside providing an excellent vista from the large Wildwood development and the A34 SE of Stafford The site is noted for its diversity of wildlife and is an important biodiversity link in the area which has been ignored within the plans</p>	No	No	No	<p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district's agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p>

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							<p>Landscape sensitivity has been assessed through the Landscape Sensitivity Study. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that better perform as sustainable allocations. Any future planning application would be expected to address Policy NB4 – which the council has included as a proposed policy in the plan – insofar as the design and location of new development should take account of the characteristics and sensitivity of the landscape and its surroundings.</p> <p>The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact on habitats sites.</p> <p>No change proposed.</p>
Clewley, G & M	RES24-042-05	Policy SA3	<p>Site 036c Plan refers to site access via A34, but makes no reference to consequential traffic movements (especially access to M6/J13) Plan would significantly increase traffic in the area No suggestion that the environmental impacts and adverse effects could be mitigated The 81 houses would be detrimental to the 'sensitive landscape' create highway concerns through Acton trussell There is no unmet housing need in Stafford</p>	No	No	No	<p>Engagement throughout plan preparation has taken place with Local Highways Authority (Staffordshire County Council). They have not indicated that the impact of the proposed allocation would not generate any significant impacts on the transport network or highway safety that cannot be mitigated in line with paragraph 114 d of the NPPF.</p> <p>The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact on habitats sites.</p> <p>Landscape sensitivity has been assessed through the Landscape Sensitivity Study. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that better perform as sustainable allocations. Any future planning application would be expected to address Policy NB4 – which the council has</p>



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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							<p>included as a proposed policy in the plan – insofar as the design and location of new development should take account of the characteristics and sensitivity of the landscape and its surroundings.</p> <p>Any oversupply that may have been delivered by Stafford is not a relevant consideration when preparing the plan for South Staffordshire as it is a different HMA.</p> <p>No change proposed.</p>
Gwilt, P	RES24-092-01	Policy SA3	<p>Site 036c Site adjoins boundary with Stafford borough boundary, so will have a significant impact on their services. Roads/schools/medical facilities wont be able to cope Old croft road and Acton Hill Road are unsuitable for the excess traffic that will be brought by the development High quality arable land that must be protected from developers The site has been identified as high landscape sensitivity and replacing it with housing will have a major negative impact on the area Application for planning permission have previously been refused and reasons have not been changed since</p>	Not stated	Not stated	Not stated	<p>Implications for local services and infrastructure – including highways – have been assessed alongside the relevant responsible bodies as set out in the Housing Site Selection Topic Paper 2024. None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities or addressed through proposed policies.</p> <p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district’s agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p> <p>Landscape sensitivity has been assessed through the Landscape Sensitivity Study. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that better perform as sustainable allocations. Any future planning application would be expected to address Policy NB4 – which the council has included as a proposed policy in the plan – insofar as the design and location of new development should take account of the characteristics and sensitivity of the landscape and its surroundings.</p>

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							<p>The refusal of planning permission historically does not preclude a site from being proposed for allocation. Like all sites proposed for residential allocation, site 036c has been assessed in the round against a consistent set of planning criteria in order to determine those that better perform as sustainable allocations.</p> <p>No change proposed.</p>
Haylock, P	RES24-101-01	Policy SA3	<p>Site 036c Road infrastructure does not have the capacity to cope with more traffic. Already long queues and developments will increase the problem Local schools don't have the capacity to accommodate more people Excess pressure on local facilities Site should be protected as part of designated open countryside and farmland. Safety concerns about inclusion of pathway onto wildwood ring road- poor visibility and high speed of traffic - Retention of woodland is vital for wildlife and biodiversity in the area</p>	Not stated	Not stated	Not stated	<p>Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies. Engagement throughout plan preparation has taken place with Local Highways Authority, School Organisation Team (SOT) (both Staffordshire County Council), and Staffordshire and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical Commissioning Group). None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities, or addressed through proposed Policies HC14, and HC15.</p> <p>The protection of existing sites has been balanced against the justification for proposing site 036c which is set out in the Housing Site Assessment Topic Paper 2024. The site is a sustainable non-Green Belt opportunity that national policy requires consideration prior to considering green belt release.</p> <p>The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact on habitats sites.</p> <p>No change proposed.</p>
Henderson, I	RES24-104-01	Policy SA3	<p>Site 036c - Site has previously been rejected by the planning committee and is unpopular amongst residents and councillors -Runs against policy documents surrounding sustainable green belt land -. In the conclusions to Appendix 5 of the 2022 Policy and Physical Constraints</p>	Yes	No	No	<p>The refusal of planning permission historically does not preclude a site from being proposed for allocation. Like all sites proposed for residential allocation, site 036c has been assessed in the round against a consistent set of planning criteria in order to determine those that better perform as sustainable allocations. The popularity – or</p>

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			<p>Document it is recommended three times that this site should not be taken forward into the Local Plan as follows –</p> <p>2.6 south of Stafford is not recommended to be taken forward to meet the GBHMA housing shortfall.</p> <p>2.7 south of Stafford was deemed unlikely to meet the unmet needs of the conurbation and performed particularly badly in terms of deliverability and public transport access.</p> <ul style="list-style-type: none"> <li>- Described as 'much valued countryside' by Open Countryside</li> <li>-Site is grade 2/3 farmland should not be developed on based on the councils own classification</li> <li>-Stafford borough council opposed development in a representation in 2022</li> <li>-Infrastructure issues brought up in 2022 are increasingly difficult today</li> <li>-Council massively exceeding its allocated number of housing</li> <li>-Only one GP practice in the area</li> <li>-Road system already severely congested, cannot handle more traffic, especially on some single track lanes</li> <li>-Site contributes to 'real parkland feel' and is prosperous farmland</li> <li>-Site is a very diverse wildlife habitat</li> <li>-No clear reasons or justifications have been given for why the site should be allocated for housing</li> <li>-Proposal for 81 houses is not sustainable</li> </ul>				<p>otherwise – of a particular site, is not one such relevant planning matter.</p> <p>References to 'South of Stafford' included within Appendix 5 to the Spatial Housing Strategy and Infrastructure Delivery are in relation to areas of search for large urban extensions or new settlements, and comments in that paper are set within that context.</p> <p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district's agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p> <p>Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies as set out in the Housing Site Selection Topic Paper 2024. None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities or addressed through proposed policies.</p> <p>Any oversupply that may have been delivered by Stafford is not a relevant consideration when preparing the plan for South Staffordshire as it is a different HMA. The site is a sustainable non-Green Belt opportunity that national policy requires consideration prior to considering green belt release. The council has sought to maximise the development opportunities on sites outside of the Green Belt in the first instance, this includes site 036c located within Open Countryside, before identifying Green Belt sites. This approach is in conformity with paragraphs 146 and 147 of the NPPF. Taking all the different considerations together, site 036c has been identified as suitable to contribute to meeting South Staffordshire's housing requirement.</p>

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							<p>The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact on habitats sites.</p> <p>No change proposed.</p>
Martin, J	RES24-144-01	Policy SA3	<p>Site 036c – land south of Stafford</p> <p>Although the land is private ownership, it is still classed as green open space that has only ever been used for farming, and losing it will have a serious detrimental impact to the community</p> <p>This application does not align with section 8 and 11 of the NPPF</p> <p>Key feature of the land is its natural topography, abundance of wild life and high quality agriculture and should not be lost</p> <p>Increased traffic movements will negatively affect existing infrastructure</p> <p>Community facilities in area at breaking point</p>	No	No	No	<p>The council considers that all proposed allocations comply with the NPPF and the spatial strategy (identified in Policy DS5) insofar as they are located to deliver sustainable patterns of development that are distributed across the district on strategic planning matters and meet the authorities' identified housing need.</p> <p>Landscape sensitivity has been assessed through the Landscape Sensitivity Study. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that better perform as sustainable allocations. Any future planning application would be expected to address Policy NB4 – which the council has included as a proposed policy in the plan – insofar as the design and location of new development should take account of the characteristics and sensitivity of the landscape and its surroundings.</p> <p>The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact on habitats sites.</p> <p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district's agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been</p>

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							<p>assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p> <p>Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies as set out in the Housing Site Selection Topic Paper 2024. None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities or addressed through proposed policies.</p> <p>No change proposed.</p>
Phillips, S	RES24-181-01	Policy SA3	<p>Site 036c, land south of Stafford Site was deemed not viable by Stafford Borough Council Violates Cannock Chase wildlife Is a replica of a plan which was rejected by SSDC The site is unnecessary to meet housing need The allocation is not in compliance with the council's published planning policy The duty to cooperate has been breached Fails to cooperate with policy DS3 Ruins the landscape character of the area which is protected under policy NB4 Site is within the SAC of the Cannock Chase AONB which should be preserved Does not comply with EC11 as the infrastructure provision in the area is insufficient</p>	No	No	No	<p>Any assessment by Stafford Borough Council will have been on sites within their administrative area.</p> <p>The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact on habitats sites.</p> <p>The refusal of planning permission historically does not preclude a site from being proposed for allocation. Like all sites proposed for residential allocation, site 036c has been assessed in the round against a consistent set of planning criteria in order to determine those that better perform as sustainable allocations.</p> <p>Albeit as a relatively smaller proposed allocation, site 036c will still contribute to meeting the housing needs of South Staffordshire alongside the other residential allocations in the plan.</p> <p>Allocation of the site will remove it from all its current spatial planning policy designations (including as Open Countryside) and therefore these would no longer apply. Once removed, only the relevant DM policies that are applicable would apply.</p> <p>Landscape sensitivity has been assessed through the Landscape Sensitivity Study. All proposed</p>



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							<p>sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that better perform as sustainable allocations. Any future planning application would be expected to address Policy NB4 – which the council has included as a proposed policy in the plan – insofar as the design and location of new development should take account of the characteristics and sensitivity of the landscape and its surroundings.</p> <p>Development in locations to the northeast of the district towards Cannock Chase National Landscape, have the potential to have a negative effect on the character and/or setting of the National Landscape. Any future planning application would be expected to address Policy NB4. In addition, any specific developer contributions that are required to mitigate any adverse impacts of development on Cannock Chase SAC will be secured at the point of a planning application approval.</p> <p>Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies as set out in the Housing Site Selection Topic Paper 2024. None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities or addressed through proposed policies.</p> <p>No change proposed.</p>
Simcox, E.A	RES24-212-01	Policy SA3	<p>Site 036C Green belt is prime agricultural land in the open countryside which should be protected Development will drain resources locally – roads, schools, medical facilities Area is prone to flooding Individual villages in the countryside need to be protected and the wildwood estate nearby is already the nearest housing estate in the borough</p>	Not stated	Not stated	Not stated	<p>Site 036c is not Green Belt, it is designated as Open Countryside.</p> <p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district’s agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that</p>

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							<p>are better performing as sustainable allocations.</p> <p>Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies. Engagement throughout plan preparation has taken place with Local Highways Authority, School Organisation Team (SOT) (both Staffordshire County Council), and Staffordshire and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical Commissioning Group). None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities, or addressed through proposed Policies HC14, and HC15.</p> <p>All proposed allocations have been screened by the council against fluvial flood zones to determine unsuitable sites within flood zone 3. Remaining sites have been assessed by the Lead Local Flood Authority (LLFA) to determine sites which presented unmitigable flood risk(s). A level 2 Strategic Flood Risk Assessment (SFRA) was also commissioned to address Environment Agency concerns pertaining to 8 sites, which site 036c was not one. This process is set out in more detail in the Strategic Flood Risk Assessment and Sequential Test Topic Paper 2024.</p> <p>The council does not consider that the proposed allocation of site 036c will have a negative impact upon the separation of Stafford town and the villages/settlements within South Staffordshire District, in particular the setting or character of Acton Trussell. As a small urban extension, the site option performs better than other site options as set out in the Housing Site Selection Topic Paper 2024.</p> <p>No change proposed.</p>
Simms, J	RES24-213-01	Policy SA3	<p>Site 036c The land is productive farmland that is graded 2/3 by SSDC's own metrics It is classical rolling countryside that is noted for its diversity of wildlife Does not comply with policy DS3 Meets none of the objectives of the policy No unmet housing need in the area</p>	No	No	No	<p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district's agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed</p>

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			<p>Fails the duty to cooperate with Stafford Borough Council Site is within the SAC of the Cannock Chase AONB, and biodiversity destroyed could not be mitigated with the other schemes suggested SSDC maintain a brownfield register, which should be prioritised as a site for development</p>				<p>sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p> <p>The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact on habitats sites.</p> <p>Landscape sensitivity has been assessed through the Landscape Sensitivity Study. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that better perform as sustainable allocations. Any future planning application would be expected to address Policy NB4 – which the council has included as a proposed policy in the plan – insofar as the design and location of new development should take account of the characteristics and sensitivity of the landscape and its surroundings.</p> <p>Allocation of the site will remove it from all its current spatial planning policy designations (including Policy DS3, Open Countryside) and therefore these would no longer apply. Once removed, only the relevant DM policies that are applicable would apply.</p> <p>Any oversupply that may have been delivered by Stafford is not a relevant consideration when preparing the plan for South Staffordshire as it is a different HMA.</p> <p>Stafford Borough Council (SBC) and SSDC have an agreed SoCG that addresses Duty to Cooperate matters effectively that both parties consider to be sound and lawful as set out in the Duty to Cooperate Topic Paper 2024.</p> <p>Development in locations to the northeast of the district towards Cannock Chase National Landscape, have the potential to have a negative effect on the character and/or setting of the</p>

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							<p>National Landscape. Any future planning application would be expected to address Policy NB4. In addition, any specific developer contributions that are required to mitigate any adverse impacts of development on Cannock Chase SAC will be secured at the point of a planning application approval.</p> <p>As set out in the Housing Site Selection Topic Paper 2022, there is very limited available brownfield land located within the district, and not enough to meet the district's housing requirement in full. Where brownfield site opportunities are available, these have been included within the Local Plan. However, the proposed allocation of greenfield (both Green Belt and Open Countryside) sites is necessary to contribute to the district's housing requirement.</p> <p>No change proposed.</p>
Rowe, C	RES24-201-01	Policy SA3	Development at Acton Hill is completely unnecessary on pristine farm land. Stafford Borough would be providing most of the infrastructure and has objected to this proposal.	Yes	No	No	<p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district's agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p> <p>Service provision is provided by multiple authorities, not just by the council. Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies as set out in the Housing Site Selection Topic Paper 2024. None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities or addressed through proposed policies.</p> <p>No change proposed.</p>
Penkridge Parish Council	STA24-036-01	Policy SA3	Land South of Stafford A34 Acton Hill – site 582 This land is for Stafford Borough Council overspill and it an unsuitable intrusion into the Open Countryside.	Not stated	Not stated	Not stated	For the avoidance of doubt, site 582 is land off Langley Road (western edge of the Black Country). This site has been removed from the

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			<p>It is not connected to the villages of Penkridge or Acton Trussell and therefore unconnected to all the village services.</p> <p>The opportunity to discuss the bigger picture of how and what should be available for delivery in the future growth of Penkridge should not be missed at this time.</p>				<p>plan since the 2022 Regulation 19 Publication Plan.</p> <p>The justification for proposing site 036c is set out in the Housing Site Assessment Topic Paper 2024. The site is a sustainable non-Green Belt opportunity that national policy requires consideration prior to considering green belt release. Taking all the different considerations together, site 036c has been identified as suitable to contribute to meeting South Staffordshire's housing requirement.</p> <p>The site allocation is located adjacent to Stafford town and is not an isolated rural settlement as it is located adjacent to Stafford town where community facilities and other services and infrastructure are available.</p> <p>The council has identified a strategic housing site option for Penkridge and does not believe it is necessary for further site options for the village at this time, in this plan. This is set out in further detail in the Housing Site Selection Topic Paper 2024.</p> <p>No change proposed.</p>
Phillips, S	RES24-181-01	Policy SA3	<p>036c - Concerned that South Staffordshire Council is unnecessarily proposing development on this beautiful piece of Green Belt to the detriment of the local environment and residents. The housing is well in excess of the housing need identified using the New Standard Method, and infrastructure, particularly local roads, footpaths and schools are not in a position to take such a new development. As an example, the most direct route to Walton High School from the development has a section with little visibility and no footpath and is single lane for vehicles. Expecting more traffic to pass would be dangerous.</p> <p>Site 036c should be removed from the plan.</p>	Yes	No	No	<p>Site 036c is not Green Belt, it is designated as Open Countryside.</p> <p>Ensuring plans can respond to changing circumstances is a key requirement of Local Plans and the principle of 'over allocation' to ensure the plan is flexible in this regard has been long established. Site 036c contributes to this.</p> <p>Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies as set out in the Housing Site Selection Topic Paper 2024. None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities or addressed through proposed policies.</p> <p>No change proposed.</p>
Hunt, K	RES24-	Policy	site 036c	No	No	No	Implications for local services and infrastructure



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	116-01	SA3	<p>site 036c has been allocated at the very edge of South Staffordshire District council's boundaries, which will undoubtedly put unprecedented strain on the infrastructure of the neighbouring district and council</p> <p>Would not contribute to creating sustainable communities but would do the opposite</p> <p>Suitable infrastructure plans have not been put in place to support this development</p> <p>Plan is defective in terms of soundness and fails to comply with duty to cooperate</p> <p>Would put massive pressure on already busy road routes</p> <p>Sets a harmful precedent</p>				<p>have been assessed alongside the relevant responsible bodies as set out in the Housing Site Selection Topic Paper 2024. None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities or addressed through proposed policies.</p> <p>Site 036c has been assessed in the round against a consistent set of planning criteria in order to determine those that better perform as sustainable allocations.</p> <p>The IDP clearly identifies infrastructure necessary to mitigate proposed allocations. Its role is also to identify infrastructure projects that are coming forward outside the Local Plan process (e.g. some highway schemes) and potential projects that may reflect a community aspiration.</p> <p>SSDC have agreed SoCGs that address Duty to Cooperate matters with both neighbouring authorities and developers, that all parties consider to be sound and lawful as set out in the Duty to Cooperate Topic Paper 2024.</p> <p>Engagement throughout plan preparation has taken place with Local Highways Authority (Staffordshire County Council). They have not indicated that the impact of the proposed allocation would not generate any significant impacts on the transport network or highway safety that cannot be mitigated in line with paragraph 114 d of the NPPF.</p> <p>No change proposed.</p>
Bolton, H	RES24-020-02	Policy SA3 (Appendix C)	<p>The inclusion of site 036c - land at Weeping Cross goes against what a local plan sets out to achieve. It does not support South Staffordshire villages and towns, and therefore South Staffordshire's economy and communities. Stafford Borough Council is not in favour of this development and given the large number of objections since the local plan process has started, and refusal to develop on this land, it feels as though South Staffordshire Council is not listening or acknowledging. Land at Weeping Cross should be removed from the site allocations. The 81 dwellings identified should be reallocated to villages and settlements within South Staffordshire. This supports those villages and settlements. Site 36c only supports residents that</p>	No	No	No	<p>Albeit as a relatively smaller proposed allocation, site 036c will still contribute to meeting the housing needs of South Staffordshire alongside the other residential allocations in the plan. The justification for proposing site 036c is set out in the Housing Site Assessment Topic Paper 2024. The site is a sustainable non-Green Belt opportunity that national policy requires consideration prior to considering green belt release. Taking all the different considerations together as set out in the Housing Site Selection Topic Paper 2024, site 036c has been identified</p>

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			want to live near Stafford. It doesn't support residents in South Staffordshire that want to stay in South Staffordshire villages and settlements.				<p>as suitable.</p> <p>Stafford Borough Council (SBC) and SSDC have an agreed SoCG that addresses Duty to Cooperate matters effectively that both parties consider to be sound and lawful as set out in the Duty to Cooperate Topic Paper 2024.</p> <p>Like all sites proposed for residential allocation, site 036c has been assessed in the round against a consistent set of planning criteria in order to determine those that better perform as sustainable allocations. The popularity – or otherwise – of a particular site, is not one such relevant planning matter.</p> <p>No change proposed.</p>
Burgess, S	RES24-030-01	Policy SA3 (Appendix C)	Site 036C should be deleted from the Plan as it is an inappropriate site on which a planning application was previously refused permission due to contradicting South Staffordshire's own policies. It does not meet the needs of either South Staffordshire or Stafford Borough Council.	Not stated	Not stated	Not stated	<p>The refusal of planning permission historically does not preclude a site from being proposed for allocation. Like all sites proposed for residential allocation, site 036c has been assessed in the round against a consistent set of planning criteria – as set out in the Housing Site Selection Topic Paper 2024 – in order to determine those that better perform as sustainable allocations. The site is a sustainable non-Green Belt opportunity that national policy requires consideration prior to considering green belt release.</p> <p>No change proposed.</p>
<b>Other Omission sites</b>							
PlanIT Planning & Development for Amadis Holdings Ltd	AGT24-034-01-07	Policy SA3	<p>Land to the west of Yew Tree Lane should be removed from the Green Belt and allocated for residential development. The allocation would deliver a number of benefits, including the provision of much needed market and affordable housing and new public open space immediately adjacent to the built-up edge of Wolverhampton. The site is a logical location for development with strong defensible Green Belt boundaries in the form of well-established hedgerows.</p> <p>Policy SA3 should be amended to include the additional land which is identified by these representations within the list of allocated sites for a minimum capacity of 120 homes. The Plan is presently unsound because of its failure to identify Safeguarded Land to meet the district's longer term housing needs without the need for further reviews of the district's Green Belt boundaries. If this site is not included as an allocation, it should be identified as Safeguarded Land within a new policy.</p>	Yes	No	Yes	<p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>The council's Green Belt Study (2019) takes a strategic view for considering the harm of releasing land from the Green Belt. Its methodology ensures that if there are variations to the harm of releasing land from the green belt within the wider land parcel, then this is reflected in the assessment results.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.
Claremont Planning Consultancy for Noakes, J	AGT24-012-01-07	Policy SA3	Site at Essington Road should be allocated as it doesn't contribute towards any of the 5 purposes of the Green Belt, is in close proximity to shops and services, is not subject to flood risk, is not constrained by heritage assets or neighbouring uses and vehicular access is achievable via Essington Road. Site is low Green Belt harm and low landscape sensitivity. A broader diversity of sites on the edge of the urban area should be considered. Modifications to the plan and the inclusion of additional sites, including Land at Essington Road is necessary for the plan to be sound.	Yes	No	No	<p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>The council's Green Belt Study (2019) takes a strategic view for considering the harm of releasing land from the Green Belt. Its methodology ensures that if there are variations to the harm of releasing land from the green belt within the wider land parcel, then this is reflected in the assessment results.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p>
Gainey, A	RES24-075-01	Policy SA3	Support removal of Linthouse Lane.	Not stated	Not stated	Not stated	Comments noted.
Goldfinch Town Planning Services	AGT24-020-01-01	Policy SA3	Goldfinch Town Planning Services welcomes the removal of previously proposed major housing site allocation (for 350 units) at site 582 Langley Road, Lower Penn	Not stated	Not stated	Not stated	Comments noted.
Penkridge Parish Council	STA24-036-01	Policy SA3	The Local Plan Review does not include consideration of land to the west. The land beyond the Railway already has some development to the west. There are services already available within close reach of the village, there appears to be land available for future growth of the village to the west which should be considered for growth after 2038, without the need to set up new communities at Dunston or Gailey.	Not stated	Not stated	Not stated	<p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p>

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Staffordshire County Council	STA24-044-02	Policy SA3	<p>SCC have been in dialogue with the Parish Council for an extended period of time in relation to their Neighbourhood Plan and the scenarios presented by public land holdings to the west of the village. There is an increased sense of frustration that the 'West of Penkridge' proposal has not been properly communicated/articulated and considered by the LPA so the community can understand the options and benefits. We are also concerned over long term impacts of further piecemeal development to the north of Penkridge in a non-sustainable linear fashion without any infrastructure improvements (as opposed to just mitigation) – i.e. not using planning as a tool to improve the community through strategic planning. For example the proposals for the West of Penkridge include provision for re-routing of the A449 through the new development on a road designed to accommodate high vehicle flows and HGVs given the A449 is the signed diversion route for M6 closures. The proposal to re-route the A449 will allow the historic centre of the village to be returned to a local street and provide more of a Place function, with active travel options and alternate uses to land previously dedicated to motor vehicles.</p> <p>The pause in Plan making following the 2022 Regulation 19 consultation afforded opportunity for West of Penkridge to be considered in the 2024 Spatial Housing Strategy Paper, which added new options and refreshed those previously considered. However, this was not undertaken.</p>	Yes	No	Yes	<p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>Land north of Penkridge is considered a proportionate allocation for Penkridge given its status as a Tier 1 settlement and the sites credentials as a non-Green Belt site in a sustainable location.</p>
Environment Agency	STA24-019-01	Policy SA3	<p>We welcome the addition of a Level 2 SFRA. The Level 2 SFRA shows that the critical 1 in 100 year plus climate change flood extent encroaches (albeit largely into public open space) on sites 119a, 284, 139, Land North of Penkridge, SA1 and SA4. The SFRA confirms that for the majority of these sites the encroachment is only minor.</p> <p>All these sites will therefore require a site specific FRA which shows development laid out as to avoid the floodplain and finished floor levels 600mm above the 1 in 100 plus climate change flood level. This should be detailed within the allocation requirements. In addition, the quantum of development should be reviewed to ensure that it can fit onto the area outside the 1 in 100 plus climate change flood event, with particular note of 119a which shows about a third of the site affected by flooding. Although referenced within the Sustainability Appraisal it is unclear where the evidence sits to clearly demonstrate how the proposed site allocations have had the Sequential Test applied as is required by Paragraphs 161 and 162 of the NPPF. We recommend however given the proximity of the fluvial floodplain, residual risk should be mitigated for by it being required that finished floor levels are set at or in excess of 600mm above the 1 in 100 year plus climate change for that specific location.</p> <ul style="list-style-type: none"> <li>• Site Ref 617</li> <li>• Site Ref 646a</li> </ul>	Not stated	Not stated	Not stated	<p>Comments noted.</p> <p>Following the representation submitted by the Environment Agency during the 2022 Regulation 19 consultation, wording was added to sites 119a, 139, SA1, SA2 and 617 which should alleviate concerns raised - "Provide a site-specific FRA which shows development laid out as to avoid the floodplain and finished floor levels 600mm above the 1 in 100 plus climate change flood level."</p>

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			<ul style="list-style-type: none"> <li>Site Ref 646b</li> </ul>				
WSP UK Ltd for Seddon Homes	AGT24-045-01-03	Policy SA3	Object to the part of Ash Flats site (SHELAA site 034) in South Staffordshire not being allocated. Sites do not always follow Borough boundaries and the delivery and quality of a scheme should not be constrained due to having to be confined to a single Borough. Stafford are also in the process of conducting a Local Plan review and have consulted on the Preferred Options Plan. Within the Preferred Options Plan, Land at Ash Flats is identified as a draft housing allocation. The intention is not necessarily to seek residential development on this southern part of the site requiring South Staffordshire to apportion some of its housing numbers to this site, but more that there is a joined-up approach that enables the full extent of the Ash Flats site to come forward. It is acknowledged that the southern part of the Ash Flat site is within the Flood Zone, therefore, whilst unlikely to come forward for housing, this doesn't preclude it from being suitable to accommodate non-housing elements of a wider scheme being delivered at Ash Flats such as ecological and landscape enhancements. A main modification is required to Policy SA3 to include 'Land adjacent to M6 off Ash Flats Lane' (site reference 034) as a cross-boundary housing allocation.	Not stated	No	No	<p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p>
Emery Planning for Wain Estates	AGT24-016-02-14	Policy SA3	<p>Our representations to policies DS4 and DS5 raise significant concerns in relation to the proposed housing requirement. To address these issues, our client proposes an omission site for allocation (land at Penkridge Road, Acton Trussell).</p> <p>There is a major employment site located 1km walking or cycling distance from Acton Trussell (Acton Gate), there is a primary school located less than 1km walking distance at the neighbouring village of Dunston (a tier 4 settlement). The settlement is also located just 1.5km from the edge of Stafford. In terms of public transport, bus stops are located approximately 180m to the north of the site, Penkridge Train Station is located approximately 4km to the south. New village shop could be delivered as part of the development proposals, with its long-term future secured through Section 106 contributions. The SHELAA 2023 assessment did not identify any technical or other constraints.</p> <p>The proposed allocation at Land off Penkridge Road, Acton Trussell provides an opportunity to deliver thoughtfully designed homes, alongside extensive open space and a village shop, while supporting the sustainable growth of a rural settlement. These representations demonstrate that the site is suitable, achievable and available and would be deliverable in the short term and the site should be allocated in the emerging Local Plan.</p>	Not stated	No	No	<p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>The council's Green Belt Study (2019) takes a strategic view for considering the harm of releasing land from the Green Belt. Its methodology ensures that if there are variations to the harm of releasing land from the green belt within the wider land parcel, then this is reflected in the assessment results.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>It is considered appropriate to limit development in Tier 4 and 5 settlements due to their unsustainable location. It is considered that the policy strikes the correct balance by still allowing</p>



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							limited development including conversion of redundant rural buildings and limited affordable housing to meet local needs. The allowance for very limited redevelopment of PDL for housing where the proposal would not increase sustainable transport movements is considered appropriate.
RCA Regeneration for St Philips	AGT24-036-04-02	Policy SA3	The housing allocations at Policy SA3 do not allocate any housing to urban edge sites, which would take advantage of existing services and transport infrastructure of neighbouring Black Country settlements. We do not agree with allocations over reliant on the tiered settlements of South Staffordshire as this completely ignores the fact that the authority is inter-dependent with the Black Country for employment, retail and educational opportunities and that meeting the needs of the Black Country will require the release of some Green Belt land within South Staffordshire: something that was acknowledged in the later iteration of the emerging Black Country Plan. With regard to the Land at Blackhalve Lane, we consider a more comprehensive scheme would ensure a more holistic approach is taken to creating a robust, enduring and permanent Green Belt boundary. An allocation here would also serve as a logical opportunity to deliver some of Wolverhampton's unmet need in a highly sustainable location. The site can deliver a strong mix of housing in accordance with the density and type prescribed within the proposed policies, whilst delivering green infrastructure and other public benefits. we urge that the council gives further consideration to our client's site at Blackhalve Lane, and it should be included as a housing allocation within the Submission Plan.	Not stated	No	No	<p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>The council's Green Belt Study (2019) takes a strategic view for considering the harm of releasing land from the Green Belt. Its methodology ensures that if there are variations to the harm of releasing land from the green belt within the wider land parcel, then this is reflected in the assessment results.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>All urban fringe locations on the edge of the Black Country are Green Belt locations. The broad location of the urban fringe of the Black Country does not offer the level of public transport, particularly to employment centres in the district and surrounding areas, which are present in the District's Tier 1 settlements and are therefore not considered to be well served by public transport, relying on limited bus services to access higher order services.</p>
Savills UK Ltd for FGD Ltd	AGT24-038-03-01	Policy SA3	Promoted site at Mile Flat, Kingswinford is considered that the Site is suitable for residential and / or employment uses, is available for development and could be delivered within the next 5 years if required. In regard to education, the site is of a scale where land for a primary school and / or community facilities could be provided to support residential development on the site and elsewhere in the District / Kingswinford if required.	Not stated	No	Not stated	<p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>The council's Green Belt Study (2019) takes a strategic view for considering the harm of releasing land from the Green Belt. Its</p>

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			<p>Although the Site is in an area of 'high' Green Belt harm, all of the land to the west of the Black Country has either been assessed as 'high' or 'very high' and the Site has 'low-moderate' landscape sensitivity. It is considered that suitable Green Belt compensatory and landscape improvements could be provided on the Site if it was allocated for residential and / or employment uses.</p> <p>Regarding the impacts on the scheduled roman forts to the south identified in the HESA, the HESA is a purely desk based exercise therefore we do not consider that development in the south of the site should be ruled out at this early stage. If the site were to be allocated, further technical work could be undertaken by the landowner to identify the significance of the heritage assets and any mitigation which could be implemented. There are also existing bus stops on Swindon Road (immediately adjacent) and Enville Road (c. 50m from the Site) to the north of the Site. Both stops serve bus route 16 which offers a frequent service and connects the Site to Stourbridge, Wombourne, Kingswinford and Wolverhampton.</p>				<p>methodology ensures that if there are variations to the harm of releasing land from the green belt within the wider land parcel, then this is reflected in the assessment results.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>All urban fringe locations on the edge of the Black Country are Green Belt locations. The strategy focuses Green Belt release on the districts most sustainable Tier 1 settlement within walking distance of rail access. The broad location of the urban fringe of the Black Country does not offer the level of public transport, particularly to employment centres in the district and surrounding areas, which are present in the District's Tier 1 settlements and are therefore not considered to be well served by public transport, relying on limited bus services to access higher order services.</p>
Berrys for John Davies Farms Ltd	AGT24-006-02-02	Policy SA3	<p>Omission site 671 (general) Policy SA3 [corrected from SA5] of the Publication Plan proposes a number of site allocations that, as detailed in the Green Belt Study (2019) (table 7.2), would result in 'moderate high', 'high' or 'very high' levels of harm to the Green Belt. Such sites include sites 224 Codsall, 523 Cheslyn Hay and 536a Great Wyrley. The release of these sites will therefore result in a weakening of the Green Belt, for example by leaving a narrow gap between towns, increasing its containment by urban areas or by isolating an area of Green Belt that makes a stronger contribution (as detailed in paragraph 6.23 of the Green Belt Study). Given the above, it is considered that growth proposed on allocations that would result in significant levels of harm (moderate-high and above) to the Green Belt, should be directed to sites where a lesser degree of harm would arise and where the level of growth would ensure that the Plan plans positively for the provision of housing sites of less than one hectare, meets housing needs of lower tier (tier 4) settlements, maintains and enhances the vitality of rural communities and their local services.</p>	Not stated	No	Not stated	<p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>The council's Green Belt Study (2019) takes a strategic view for considering the harm of releasing land from the Green Belt. Its methodology ensures that if there are variations to the harm of releasing land from the green belt within the wider land parcel, then this is reflected in the assessment results.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the</p>

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			The Plan is therefore considered to be unsound as it not justified (is an appropriate strategy, taking into account the reasonable alternatives).				plan's ability to deliver housing growth.
Berrys for John Davies Farms Ltd	AGT24-006-02-02	Policy SA3	<p>Omission site 671 (site specific) Policies Map 28 for Seisdon limits opportunities for housing growth as it does not identify any housing site allocations and draws the development boundary tightly around the existing built form of the settlement.</p> <p>This treatment of Seisdon in the Publication Plan fails to: recognise the sustainability of the settlement, protect and enhance the settlement's sustainable village centre and its services and facilities, meet housing needs during the Plan period, including the needs of the settlement and the NPPF requirement to provide 10% of housing growth on sites of less than 1 hectare, ensure that the Plan makes an appropriate contribution towards the unmet needs of the Greater Birmingham Housing Market Area, reduce reliance on the delivery of housing on two strategic sites &amp; ensure that development is directed to sites that have less harm on the Green Belt. The Green Belt Study identifies that sites 671 and 358 give rise to the least amount of harm on the purposes of the Green Belt in this location. In addition, it is contended that there are a number of inaccuracies or omissions with the sustainability assessment of site 671 in Seisdon including on: Climate Change and Adaptation, Cultural Heritage &amp; Green Belt.</p> <p>It is considered that the site represents the most sustainable location for new housing development in Seisdon and should therefore be allocated in whole, or part, to help ensure that development needs are met, an appropriate strategy is provided that takes into account the needs of this Tier 4 settlement, reduced reliance is placed on sites that suffer from significant questions over deliverability and consistency with national policy on housing site requirements and Green Belt.</p>	Not stated	No	Not stated	<p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>The council's Green Belt Study (2019) takes a strategic view for considering the harm of releasing land from the Green Belt. Its methodology ensures that if there are variations to the harm of releasing land from the green belt within the wider land parcel, then this is reflected in the assessment results.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>It is considered appropriate to limit development in Tier 4 and 5 settlements due to their unsustainable location. It is considered that the policy strikes the correct balance by still allowing limited development including conversion of redundant rural buildings and limited affordable housing to meet local needs. The allowance for very limited redevelopment of PDL for housing where the proposal would not increase sustainable transport movements is considered appropriate.</p>
RCA Regeneration for Seven Capital	AGT24-036-03-02	Policy SA3	The housing allocations at Policy SA3 do not allocate any housing to urban edge sites, which would take advantage of existing services and transport infrastructure of neighbouring Black Country settlements. We do not agree with allocations over reliant on the tiered settlements of South Staffordshire as this completely ignores the fact that the authority is inter-dependent with the Black Country for employment, retail and educational opportunities and that meeting the needs of the Black Country will require the release of some Green Belt land within South Staffordshire: something that was acknowledged in the later iteration of the emerging Black Country Plan and the	Not stated	No	No	<p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>The council's Green Belt Study (2019) takes a strategic view for considering the harm of releasing land from the Green Belt. Its methodology ensures that if there are variations to the harm of releasing land from the green belt within the wider land parcel, then this is reflected</p>

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			<p>previous Reg 19 Local Plan for South Staffordshire published in 2022.</p> <p>Regarding the site Land at Sandyfields Road, an allocation here would serve as a logical site to deliver unmet housing need arising from neighbouring authorities of Dudley and Wolverhampton. The site can deliver a good mix of housing in accordance with the density and type prescribed within the proposed policies, whilst delivering green infrastructure and other public benefits. We urge the council to cooperate with neighbouring authorities now and we urge the council to consider cross-boundary working on potential housing. We hope that the council gives further consideration to our client's site at Sandyfields Road, and it should be included as a housing allocation within the Submission Plan.</p>				<p>in the assessment results.</p> <p>All urban fringe locations on the edge of the Black Country are Green Belt locations. The strategy focuses Green Belt release on the districts most sustainable Tier 1 settlement within walking distance of rail access. The broad location of the urban fringe of the Black Country does not offer the level of public transport, particularly to employment centres in the district and surrounding areas, which are present in the District's Tier 1 settlements and are therefore not considered to be well served by public transport, relying on limited bus services to access higher order services.</p>
Savills UK Ltd for Taylor Wimpey	AGT24-037-05-31	Policy SA3	<p>We object to SA3 and consider that Land North of Linthouse Lane should be included as a strategic development location. The site was identified in the 2022 Publication Plan to deliver residential-led growth and to meet the housing shortfall of the HMA. It was allocated to deliver a minimum of 1,200 homes, community hub, primary school, community park, sports pitches and infrastructure. Full details of the exceptional circumstances and site assessment comparison can be found in the full representation. The Council's evidence continues to support the proposed allocation at Land North of Linthouse Lane and should be included in the 2024 Publication Plan.</p>	Not stated	No	Not stated	<p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>The council's Green Belt Study (2019) takes a strategic view for considering the harm of releasing land from the Green Belt. Its methodology ensures that if there are variations to the harm of releasing land from the green belt within the wider land parcel, then this is reflected in the assessment results.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p>
Zesta Planning for Completelink Ltd	AGT24-046-01-06	Policy SA3	<p>Prestwood House Care Home &amp; Estate is an established older people and care home site of nearly 40 years, offering a range of high-quality care services. Site details can be found in paragraphs 3.3 – 3.9 of the full representation. We are promoting Prestwood House Care Home &amp; Estate as an established specialist care accommodation, capable of providing around 140 additional bedroom units. The only significant constraint is its location within the Green Belt. Details on the Green Belt Study and landscape setting for this site are in paragraphs 3.16 – 3.24 of full representation.</p>	Not stated	No	Not stated	<p>The council's Green Belt Study (2019) takes a strategic view for considering the harm of releasing land from the Green Belt. Its methodology ensures that if there are variations to the harm of releasing land from the green belt within the wider land parcel, then this is reflected in the assessment results.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in</p>



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							our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.
CDC UK Ltd for Cannock Land Ltd	AGT24-010-01-02	Policy SA3	<p>Land at Longford House, Cannock</p> <p>Part of the site sites within the administrative boundary of Cannock and is currently used for car auctions. It is allocated in Cannock Chase's Local Plan as a strategic housing allocation and removed from the Green Belt. A sliver of land in South Staffordshire is also used for car auction purposes and a separate representation has been made to bring this out of the Green Belt to facilitate a comprehensive development of the site. The wider part of the site in South Staffs comprises open grassland and is used primarily for car boot sales. It makes sense to remove this land from within the Green Belt, given that strategically it can meet a wider housing need for Cannock Chase and the Black Country. The same rationale should be applied for its removal from the Green Belt as Cannock used. Para 147 of the NPPF quoted. The Council should give more weight to the strategic allocation within Cannock's emerging plan and the development of this land in conjunction with the residential allocation will create a more sustainable pattern of development.</p>	No	No	No	<p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>The council's Green Belt Study (2019) takes a strategic view for considering the harm of releasing land from the Green Belt. Its methodology ensures that if there are variations to the harm of releasing land from the green belt within the wider land parcel, then this is reflected in the assessment results.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p>
CDC UK Ltd for Cannock Land Ltd	AGT24-010-02-02	Policy SA3	<p>Wellington Drive, Cannock</p> <p>The site is accessed off Wellington Drive, in the administrative boundary of Cannock Chase District Council and forms part of a car auction facility. It is undisputable that the land has been in operation for many years and therefore is previously developed land. The administrative boundary between SSSDC and CCDC runs through the site and bisects the building. The site has been identified by CCDC as a strategic residential allocation (plans attached to representation). This representation relates specifically to the part of the site used for car auction purposes (see Plan 1) that lies adjacent to the strategic housing site in Cannock's emerging plan.</p> <p>As the land is PDL, the same rationale should be applied for its removal from the Green Belt. Para 147 of the NPPF quoted. The Council should give more weight to the strategic allocation within Cannock's emerging plan and the development of this land in conjunction with the residential allocation will create a more sustainable pattern of development. There has been a lack of dialogue with CCDC under the duty to co-operate and it is</p>	No	No	No	<p>The council's Green Belt Study (2019) takes a strategic view for considering the harm of releasing land from the Green Belt. Its methodology ensures that if there are variations to the harm of releasing land from the green belt within the wider land parcel, then this is reflected in the assessment results.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p>



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			neither rational or logical to leave this small parcel of land in the Green Belt. The inclusion of this land within the wider site allocation contributes to the viability of the development.				
Bruton Knowles	AGT24-007-01-02	Policy SA3	LATE SUBMISSION We consider Land off Old Hampton Lane should be included as a strategic development location given it can provide future housing in a highly sustainable location. We request that it be included to deliver a mix of private and affordable housing.	Not stated	Not stated	Not stated	<p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>The council's Green Belt Study (2019) takes a strategic view for considering the harm of releasing land from the Green Belt. Its methodology ensures that if there are variations to the harm of releasing land from the green belt within the wider land parcel, then this is reflected in the assessment results.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p>
Marrons Planning for L&Q Estates	AGT24-027-03-01	Policy SA3	Omission site: Land off Bridgnorth Road, Wightwick Draft Policy SA3 omits Land off Bridgnorth Road, Wightwick as an allocation. There are no technical or environmental reasons why Land off Bridgnorth Road cannot be allocated, with the only concerns raised in the assessment of the site in the Housing Site Selection Paper either considered to be unfounded or able to be dealt with through detailed design and masterplanning. Land off Bridgnorth Road is developable and easily deliverable within the early part of the SSLPR Plan period. The site is well placed to access a number of key services and facilities, including Wightwick Hall Secondary School and Sixth Form which is directly adjacent to site and is easily accessible by active travel modes. it is considered that the contribution of Land off Bridgnorth Road to the purposes of the Green Belt is far more limited than the wider assessment of parcels S59 and more specifically S59C. it is considered that concerns relating to landscape impact with specific reference to Land off Bridgnorth Road are unfounded, and not a constraint that renders the site unsuitable as an allocation for residential development. it is considered that concerns relating to trees are unfounded and not a constraint that render Land off Bridgnorth Road unsuitable as an allocation for residential development.	Yes	No	yes	<p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>The council's Green Belt Study (2019) takes a strategic view for considering the harm of releasing land from the Green Belt. Its methodology ensures that if there are variations to the harm of releasing land from the green belt within the wider land parcel, then this is reflected in the assessment results.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p>

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Marrons Planning for Boningale Homes	AGT24-027-02-01	Policy SA3	<p>Omission site: LAND AT BOSCOBEL LANE, BISHOPS WOOD</p> <p>The subject site comprises land at Boscobel Lane, Bishops Wood measuring 5.23ha. The site is located in the Green Belt and lies adjacent to the south edge of Bishops Wood.</p> <p>An outline planning application has been submitted to South Staffordshire District Council for consideration. The proposed development comprises the following;</p> <ul style="list-style-type: none"> <li>- Up to 100no. residential dwellings;</li> <li>- A Community Orchard; and</li> <li>- Community Shop.</li> </ul> <p>The site is within Flood Zone 1 and there are no listed buildings within the site.</p> <p>Whilst Bishops Wood is identified as a rural settlement, it is home to a Primary School, Public House and Village Hall and is as such considered sustainable for development purposes. Maintaining ongoing rural vitality and supporting the retention of these facilities is essential.</p> <p>In the context of a national and local housing crisis, the provision of market, and a policy compliant level of affordable housing is considered sufficient to demonstrate Exceptional Circumstances for release from the Green Belt, but beyond this, but the proposed development at Boscobel Lane will also deliver a community shop which will benefit new and existing residents. The site is controlled by Boningale Homes who are committed to the development of the site, and as such, the site is considered to be immediately, available, achievable and deliverable and as such, we consider that the Council should seek to allocate the site for development without delay.</p>	Not stated	No	Not stated	<p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>The council's Green Belt Study (2019) takes a strategic view for considering the harm of releasing land from the Green Belt. Its methodology ensures that if there are variations to the harm of releasing land from the green belt within the wider land parcel, then this is reflected in the assessment results.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p>
Pegasus Group for Richborough Estates	AGT24-030-05-15	Policy SA3	<p>The site details can be found in paragraphs 5.1 – 5.5 of the full representation (A5 Gailey). Details of how the site could be developed have yet to be fully set out, but there is significant opportunity to provide a range of properties which are consistent with the LPA's housing need. It is considered the site would promote choice for local residents in regard to housing location and could assist the unmet need of the HMA. If the LPA do not seek to remove the site from the Green Belt at this current time, it is strongly advised that this site be safeguarded for future development.</p> <p>Details on the following can be found in the full representation – Sustainability Appraisal (paragraphs 5.8 – 5.16), Green Belt (paragraphs 5.17 – 5.20), Green Belt Purposes (paragraphs 5.21 – 5.27), Availability / Sustainability / Suitability / Deliverability (paragraphs 5.28 – 5.34).</p>	Yes	No	Yes	<p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>The council's Green Belt Study (2019) takes a strategic view for considering the harm of releasing land from the Green Belt. Its methodology ensures that if there are variations to the harm of releasing land from the green belt within the wider land parcel, then this is reflected in the assessment results.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							<p>plan's ability to deliver housing growth.</p> <p>The Council considers that it would be inappropriate to release additional land from the Green Belt for safeguarded land through this Local Plan, given the need for any such release to be justified by exceptional circumstances.</p> <p>It is acknowledged that the approach to future Green Belt release will be considered through an updated Strategic Growth Study across the GBBCHMA which South Staffordshire will be an active partner in, and it is right to consider this issue strategically across this wider functional geography. To date, no GBBCHMA authority has requested that South Staffordshire provide additional safeguarded land for longer term unmet needs, nor has this been required in recent examinations in the GBBCHMA. Given these factors and the requirement in national policy to review the plan in whole or in part every 5 years, it is not considered appropriate or necessary to release safeguarded land at this stage.</p>
Pegasus Group for Richborough Estates	AGT24-030-05-18	Policy SA3	The site details can be found in paragraphs 5.1 – 5.6 of the full representation (Langley Road). The proposed development and vision document can be found in paragraphs 5.7 – 5.12. Details on the following can be found in the full representation – Sustainability Appraisal (paragraphs 5.18 – 5.25, Green Belt (paragraphs 5.26 – 5.29), Green Belt Purposes (paragraphs 5.30 – 5.48), Landscape Sensitivity (paragraphs 5.49 – 5.54), Services & Facilities (paragraphs 5.55 – 5.59), Impact on the Historic Environment (paragraphs 5.60 – 5.62), Highways (paragraph 5.63), Impact upon the Natural Environment (paragraphs 5.64 – 5.66), Recreation and Open Space (paragraph 5.67), Suitability / Deliverability / Availability (paragraphs 5.68 – 5.73). The proposed development is landscape led and presents an opportunity to deliver a comprehensive and connected new community adjoining Wolverhampton, capable of delivering approximately 390 new dwellings.	Yes	No	Yes	<p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>The council's Green Belt Study (2019) takes a strategic view for considering the harm of releasing land from the Green Belt. Its methodology ensures that if there are variations to the harm of releasing land from the green belt within the wider land parcel, then this is reflected in the assessment results.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p>
Pegasus Group for Richborough	AGT24-030-05-	Policy SA3	The site details can be found in paragraphs 5.1 – 5.5 of the full representation (New Road). The proposed development and	Yes	No	Yes	Site options have been assessed against a consistent set of planning criteria to determine

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
Estates	23		vision document can be found in paragraph 5.6. Details on the following can be found in the full representation – Featherstone and its services (paragraphs 5.7 – 5.19), Sustainability Appraisal (paragraphs 5.20 – 5.27, Green Belt (paragraphs 5.28 – 5.31), Green Belt Purposes (paragraphs 5.32 – 5.47), Landscape Sensitivity (paragraphs 5.48 – 5.50), Suitability / Deliverability / Availability (paragraphs 5.51 – 5.57). The proposed development would be landscape led and present an opportunity to deliver a comprehensive and connected new community to the north of Featherstone, with the site capable of accommodating approximately 450 dwellings.				<p>proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>The council’s Green Belt Study (2019) takes a strategic view for considering the harm of releasing land from the Green Belt. Its methodology ensures that if there are variations to the harm of releasing land from the green belt within the wider land parcel, then this is reflected in the assessment results.</p> <p>Justification for the council’s spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district’s growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan’s ability to deliver housing growth.</p>
Pegasus Group for Richborough Estates	AGT24-030-05-31	Policy SA3	The site details can be found in paragraphs 5.1 – 5.4 of the full representation (Strawmoor Lane). The proposed development and vision document can be found in paragraph 5.5. Details on the following can be found in the full representation – Codsall and its services (paragraphs 5.6 – 5.16), Sustainability Appraisal (paragraphs 5.17 – 5.25, Green Belt (paragraphs 5.26 – 5.29), Green Belt Purposes (paragraphs 5.30 – 5.50), Landscape Sensitivity (paragraphs 5.51 – 5.56), Impact on the Historic Environment (paragraphs 5.57 – 5.58), Surface Water Flooding (paragraphs 5.59 - 5.61), Highways (paragraphs 5.62 – 5.64), Suitability / Deliverability / Availability (paragraphs 5.65 – 5.69). The land represents a logical and sustainable extension to Codsall with the capacity to deliver approximately 230 dwellings.	Yes	No	Yes	<p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>The council’s Green Belt Study (2019) takes a strategic view for considering the harm of releasing land from the Green Belt. Its methodology ensures that if there are variations to the harm of releasing land from the green belt within the wider land parcel, then this is reflected in the assessment results.</p> <p>Justification for the council’s spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district’s growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan’s ability to deliver housing growth.</p>
Pegasus Group for Richborough Estates	AGT24-030-05-06	Policy SA3	The site details can be found in paragraphs 5.1 – 5.3 of the full representation (West of Codsall Road). The proposed development and vision document can be found in paragraphs 5.4 – 5.7. Details on the following can be found in the full representation – Codsall and its services (paragraphs 5.8 – 5.16), Sustainability Appraisal (paragraphs 5.17 – 5.22, Green	Yes	No	Yes	<p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>The council’s Green Belt Study (2019) takes a</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			Belt (paragraphs 5.23 – 5.25), Green Belt Purposes (paragraphs 5.26 – 5.41), Landscape Sensitivity (paragraphs 5.42 – 5.47), Sustainability (paragraphs 5.49 – 5.51), Suitability / Deliverability / Availability (paragraphs 5.52 – 5.60). The land represents a logical and sustainable extension to the existing urban area and provides an opportunity to deliver between 240 – 480 news homes, depending on the scale of land to be allocated. Richborough control land to the north (site ref 510) that is proposed to deliver a Country Park to complement the development proposals.				<p>strategic view for considering the harm of releasing land from the Green Belt. Its methodology ensures that if there are variations to the harm of releasing land from the green belt within the wider land parcel, then this is reflected in the assessment results.</p> <p>Justification for the council’s spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district’s growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan’s ability to deliver housing growth.</p>
Pegasus Group for Richborough Estates	AGT24-030-05-10	Policy SA3	The site details can be found in paragraphs 5.1 – 5.6 of the full representation (Fenton House Lane). The proposed development and vision document can be found in paragraph 5.7. Details on the following can be found in the full representation – Wheaton Aston and its services (paragraphs 5.8 – 5.14), Sustainability Appraisal (paragraphs 5.15 – 5.23), Sustainability (paragraphs 5.24 – 5.25), Landscape Sensitivity (paragraphs 5.26 – 5.29), Ecology (paragraphs 5.30 – 5.33), Heritage (paragraph 5.34), Suitability / Deliverability / Availability (paragraphs 5.35 – 5.40). Richborough encourages the Council to reallocate the site and will work closely to ensure that any required mitigation measures in relation to the protection of Motte Meadows are planned for and achieved.	Yes	No	Yes	<p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>Justification for the council’s spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district’s growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan’s ability to deliver housing growth.</p>
Pegasus Group for Clowes Developments Ltd	AGT24-030-02-02	Policy SA3	Clowes is seeking the allocation of housing land at Himley with a gross site area of 4.59 hectares and a net site area of 2.59 hectares creating development for 88 units. A site masterplan has been included at Appendix 1. Site details can be found in paragraphs 2.10 – 2.15 of the full representation (residential).	Not stated	No	No	<p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>The council’s Green Belt Study (2019) takes a strategic view for considering the harm of releasing land from the Green Belt. Its methodology ensures that if there are variations to the harm of releasing land from the green belt within the wider land parcel, then this is reflected in the assessment results.</p> <p>Justification for the council’s spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper</p>



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							2024.This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.
Jones, G	RES24-125-01	Policy SA3	Site 163a We request that this parcel be included in the plan to satisfy local and duty to cooperate on the Bloxwich/Walsall boundary Request that the green belt boundary be altered to allocate this land to safeguard.	Yes	Yes	No	<p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>The council's Green Belt Study (2019) takes a strategic view for considering the harm of releasing land from the Green Belt. Its methodology ensures that if there are variations to the harm of releasing land from the green belt within the wider land parcel, then this is reflected in the assessment results.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024.This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p>
Lichfields for St Philips	AGT24-026-02-08	Policy SA3	Wedges Mills, Wolverhampton Road Details on the site can be found in paragraphs 2.49 – 2.51 of the full representation (Wedges Mills). It would be well-served by the existing transport infrastructure and wider mitigation benefits such as the provision of new open space. St Philips requests the Council to consider a modification to draft DS5 to allocate Land at Wolverhampton Road, Wedges Mills for residential development.	Not stated	No	Not stated	<p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>The council's Green Belt Study (2019) takes a strategic view for considering the harm of releasing land from the Green Belt. Its methodology ensures that if there are variations to the harm of releasing land from the green belt within the wider land parcel, then this is reflected in the assessment results.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024.This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p>

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Lichfields for St Philips	AGT24-026-02-05	PolicyS A3	Site 416a St Philips is concerned that site 416a has been deallocated in the 2024 Publication Plan. St Philips considers that the Council has not sufficiently demonstrated why site 416a was considered a sustainable site for allocation within the 22 Publication Plan but is no longer considered to perform well enough to be allocated. Sites 416 and 416a performed identically within the SA, with the exception that site 416a was found to have higher levels of Green Belt harm and Landscape harm. However, this was based on the fact that 416 had already been removed from the Green Belt, and by virtue of its safeguarded status has previously been assessed. The relevant site proforma in the 2022 Publication Plan set a key requirement that 416 and 416a should be planned and delivered as a single site. A vision document for the site is included at Appendix 1, Green Belt issues at the site (paragraphs 2.33 – 2.38), lack of comprehensive development (paragraphs 2.39 – 2.44) and further site details in paragraphs 2.45 – 2.48 of the full representation (Wombourne).	Not stated	No	Not stated	Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.  The council's Green Belt Study (2019) takes a strategic view for considering the harm of releasing land from the Green Belt. Its methodology ensures that if there are variations to the harm of releasing land from the green belt within the wider land parcel, then this is reflected in the assessment results.  Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.
Lichfields for Taylor Wimpey	AGT24-026-03-01	Policy SA3	Clent View Road Details on the site from the SHELAA are in paragraphs 2.66 – 2.70, Green Belt are in paragraphs 2.71 – 2.73 and general site details are in paragraphs 2.74 – 2.80 of the full representation, with a vision document in Appendix 1. The site is adjacent to the western edge of Stourbridge, within a 30-minute walk of the town centre where Stourbridge Town Railway station is available. The site would deliver approximately 400 high-quality new dwellings with a mix of house type and tenure.	Not stated	No	Not stated	Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.  The council's Green Belt Study (2019) takes a strategic view for considering the harm of releasing land from the Green Belt. Its methodology ensures that if there are variations to the harm of releasing land from the green belt within the wider land parcel, then this is reflected in the assessment results.  Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.
Cerda for Offoxey Road Limited	AGT24-011-01-01	Policy SA3	The Offoxey site stands as the most suitable location within this settlement (Bishops Wood) for delivering growth. It already benefits from a resolution to grant by Planning Committee. By extending proportionately along the southern edge of the village,	Not stated	Not stated	Not stated	Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.

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			the site can contribute significantly to the housing needs. Specific site details, including nearby services and facilities can be found in 'Site Location and Context' in the full representation. Details of the site assessment and Green Belt for the Offoxey site are in the relevant paragraph. In light of our own assessment of the harm that the development of the site in question, and not including the remainder of the sub-parcel, would have upon the Green Belt, would equate to a moderate score if all of the site were to be developed, and low-moderate score if only partly developed. We assert the Council's assessment is flawed and does not represent an appropriate basis for justified and effective plan making. Details on highways, ecology, drainage, flooding, utilities and the key benefits of the site can be found in 'Development Principles' in the full representation.				The council's Green Belt Study (2019) takes a strategic view for considering the harm of releasing land from the Green Belt. Its methodology ensures that if there are variations to the harm of releasing land from the green belt within the wider land parcel, then this is reflected in the assessment results.  Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.
Webb, L	RES24-248-05	Policy SA3	It is recommended that the land at Wood Hayes Road, Wolverhampton is reviewed and assessed. The site, if allocated, is suitable and deliverable.	Not stated	Not stated	Not stated	Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.  Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.
JMS Planning for Wolverhampton Halfpenny Green Airport	AGT24-023-01-01	Policy SA3	Land South of Crab Lane Responding to affordable housing need and Policy HC6 that is particularly high in rural areas of South Staffordshire, the site could provide for high-quality affordable housing, and this could be especially beneficial if the housing could also support those seeking or in employment at Halfpenny Green Airport or the vicinity. There is potential for increase in the ecological value of site and area with the landowner willing to include measures to increase the biodiversity on site.	Not stated	Not stated	Not stated	Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.  Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.
Evolve Planning &	AGT24-	Policy	Bloor Homes is promoting Land at The Straits (Ref 560 and 566)	Not stated	Not stated	Not stated	Site options have been assessed against a

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
Design for Bloor Homes	017-01-25	SA3	for residential development. These two sites are suitable, available and achievable and should be considered if it is determined through the EiP that omission sites are necessary to make the Local Plan sound. Site locations plans are included at Appendix 1, a Landscape, Visual and Green Belt Appraisal is included at Appendix 2, and an Illustrative Concept Plan is included at Appendix 3 which demonstrate how the sites may come forward as a comprehensive development.				<p>consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>The council's Green Belt Study (2019) takes a strategic view for considering the harm of releasing land from the Green Belt. Its methodology ensures that if there are variations to the harm of releasing land from the green belt within the wider land parcel, then this is reflected in the assessment results.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p>
Evolve Planning & Design for Bloor Homes	AGT24-017-01-25	Policy SA3	<p>Land North of Sandyfields Road (Site 560) (The Straits Rep)</p> <p>The site description can be found in paragraphs 4.4 – 4.6 of the full representation – Grade 3 / 4 quality agricultural land, within the Green Belt, in Flood Zone 1 and is adjacent to the development boundary of Dudley.</p> <p>Delivery of approximately 600-650 new homes (both parcels), delivery of a primary school, Green Infrastructure Strategy incorporating open parkland, new car park to serve Baggeridge and children's play areas.</p> <p>Full details of the Sustainability Appraisal findings, Sequential Test, Green Belt Harm, Landscape Harm, impact on the Historic Environment, Surface Water Flooding and Highways can be found in paragraphs 4.11 – 4.43 of the full representation.</p> <p>There is an agreement in place between the landowner and Bloor Homes to facilitate the development of the site. Information gathered to date concludes there are no physical or other constraints likely to render the site undeliverable within the proposed plan period. The site is deliverable and immediately available.</p>	Not stated	Not stated	Not stated	<p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>The council's Green Belt Study (2019) takes a strategic view for considering the harm of releasing land from the Green Belt. Its methodology ensures that if there are variations to the harm of releasing land from the green belt within the wider land parcel, then this is reflected in the assessment results.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p>
Evolve Planning & Design for Bloor Homes	AGT24-017-01-25	Policy SA3	<p>Land West of The Straits (Site 566) (The Straits Rep)</p> <p>The site description can be found in paragraphs 4.7 – 4.9 of the full representation – within the Green Belt, in Flood Zone 1 and is adjacent to the development boundary of Dudley.</p> <p>Delivery of approximately 600-650 new homes (both parcels),</p>	Not stated	Not stated	Not stated	<p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p>

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**CHAPTER 6 & POLICIES MA1-SA5: SITE ALLOCATIONS**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>delivery of a primary school, Green Infrastructure Strategy incorporating open parkland, new car park to serve Baggeridge and children's play areas.</p> <p>Full details of the Sustainability Appraisal findings, Sequential Test, Green Belt Harm, Landscape Harm, impact on the Historic Environment, Surface Water Flooding and Highways can be found in paragraphs 4.11 – 4.43 of the full representation.</p> <p>There is an agreement in place between the landowner and Bloor Homes to facilitate the development of the site. Information gathered to date concludes there are no physical or other constraints likely to render the site undeliverable within the proposed plan period. The site is deliverable and immediately available.</p>				<p>The council's Green Belt Study (2019) takes a strategic view for considering the harm of releasing land from the Green Belt. Its methodology ensures that if there are variations to the harm of releasing land from the green belt within the wider land parcel, then this is reflected in the assessment results.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p>
RPS Group for IM Land	AGT24-036-01-04	Policy SA3 (Appendix A)	<p>Details of the Green Belt Study in relation to Site 591 can be found in the full representation.</p> <p>On this basis, RPS does not consider the evidence in the GBS to be adequate or proportionate and so is not soundly-based in respect of parcel 391.</p> <p>A separate Landscape and Green Belt Review (LGBR) was prepared by Barton Willmore (BW) and which is appended to this submission (Appendix 2).</p> <p>In light of the findings of the site-specific assessment, RPS does not consider the Council's GBS to be sufficiently robust or adequate and so, on that basis, the Council's assessment of parcel's 591 is not soundly-based (not justified). Consequently, RPS contend that exceptional circumstances exist to justify releasing these parcels from the Green Belt and to allocate them for housing in the SSLP.</p>	Not stated	No	Not stated	<p>Comments noted.</p> <p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>The council's Green Belt Study (2019) takes a strategic view for considering the harm of releasing land from the Green Belt. Its methodology ensures that if there are variations to the harm of releasing land from the green belt within the wider land parcel, then this is reflected in the assessment results.</p>
<b>POLICY SA4: GYPSY AND TRAVELLER ALLOCATIONS</b>							
<b>General issues: Gypsy and traveller allocations</b>							
City Wolverhampton Council	STA24-012-01	Policy SA4	<p>In terms of unmet need for gypsy and traveller pitches, CWC acknowledges the scale of unmet need for gypsy and traveller pitches arising in South Staffordshire, as set out in para 6.39 of the Plan. Work on the Wolverhampton Local Plan confirms that there are no opportunities within the City to deliver additional pitches to respond to this need.</p>	Yes	No	Yes	<p>Comments noted. South Staffordshire Council will review Wolverhampton Council's approach when further details are published as part of the future Wolverhampton's Regulation 19 Plan. Further details can be found in the bilateral SoCG between South Staffordshire and Wolverhampton.</p>
Sandwell Council	STA24-038-01	Policy SA4	<p>LATE SUBMISSION</p> <p>Acknowledge the SSLP gypsy and traveller pitch shortfall and clarify that the Reg 18 SLP demonstrated that it had explored all available opportunities and due to the lack of any potential sites is not able to deliver additional gypsy and traveller pitch pitches</p>	Yes	No	Yes	<p>Comments noted. South Staffordshire Council will review Sandwell Council's approach when further details are published as part of Sandwell's Regulation 19 Plan. Further details can be found in the bilateral SoCG between South</p>



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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			in Sandwell				Staffordshire and Sandwell.
Cheslyn Hay Parish Council	STA24-011-01	Policy SA4	Cheslyn Hay PC would prefer that current pitches are not continually extended and a fairer distribution is made across all 27 Parishes, together with stricter enforcement of existing regulations where pitches are extended or altered without prior permission.	Not stated	No	Not stated	Where suitable options for new pitches exist, the Local Plan proposes to allocate pitches to meet the district's existing families' (who meet the planning definition) 5-year need, as informed by the GTAA update. The proposed allocations are informed by the council's Pitch Deliverability Study (PDS) 2021 and Gypsy and Traveller Topic Paper 2024. The Council have looked to secure new sites in District as evidenced in the documents: 'Gypsy and Traveller Public Site Search 2021', 'Gypsy and Traveller County Land Assessment 2022' and 'Gypsy and Traveller Topic Paper 2024'.
Goldfinch Town Planning Services	AGT24-020-01-01	Policy SA4	The impacts of this proposed scale of growth on existing sensitive small rural village settlements which lack the range of services, facilities and highway infrastructure necessary to accommodate this proposed scale of growth in new pitch numbers is very concerning. The residential amenity impacts on the existing settled population will be considerable. This scale of growth in new, totally excessive high pitch numbers being proposed would appear to be more appropriate and suitable within a large urban area rather than a small, heavily rural district like South Staffordshire. This scale of growth in new pitch numbers does not appear to be sustainable in a heavily rural area.	No	No	No	Site allocations have been considered through the Gypsy and Traveller Topic Paper 2024 which takes into account the impact on local character and amenity of local residents.  No change proposed.
Penkridge Parish Council	STA24-036-01	Policy SA4	Travellers Site A449 There are concerns that the site is to made permanent this has already been rejected since 2009 and should continue to be part of the Green Belt.	Not stated	Not stated	Not stated	The site has now been granted permanent permission under 24/00060/FUL.  No change proposed.
Stafford Borough Council	STA24-043-01	Policy SA4	With regards to future provision outside of South Staffordshire District, the Borough Council can confirm it is not in a position to meet any of the shortfall arising from the Black Country at this stage and furthermore cannot provide for any unmet gypsy, traveller & travelling show-people needs within Stafford Borough.	Yes	No	Yes	Comments noted.  South Staffordshire Council consider that it is currently unclear whether Stafford Borough Council have fully explored all options to providing gypsy and traveller pitches. Further details can be found in the bilateral SoCG between South Staffordshire and Stafford.
National Highways	STA24-032-01	Policy SA4	At such time these sites come through the planning application process, we will need to be consulted at an early stage to ensure appropriate assessments are carried out in accordance with DfT Circular 01/2022 and the Design Manual for Roads and Bridges (DMRB) guidelines. This is to identify the need for, and form of any mitigation required for the SRN. Details on these smaller sites will be required in terms of the proposed boundary treatments to the SRN including any	Not stated	Not stated	Not stated	Comments noted.

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			necessary environmental mitigation, for example noise attenuation and surface water drainage to demonstrate compliance with the DfT Circular 01/2022. The formation of any new junction on the SRN will need to be compliant with the DfT Circular 01/2022 and DMRB standards. Similarly, where existing site access arrangements which interface with the SRN are identified for use, any existing non-DMRB compliant features which cannot be improved to current DMRB standards will need to be the subject of appropriate Departures from Standard and DfT Circular 01/2022.				
<b>Site GT01 – New Acre Stables, Penkridge</b>							
							No representations received.
<b>Site GT06 - The Spinney, Slade Heath</b>							
							No representations received.
<b>Site GT07 – The Bungalow, Coven</b>							
							No representations received.
<b>Site Gt08 – Brinsford Bridge, Coven Heath</b>							
							No representations received.
<b>Site GT14 – Brickyard Cottage, Essington</b>							
							No representations received.
<b>Site GT17 - The Stables, Upper Landywood</b>							
							No representations received.
<b>GT18 – Park Lodge, Wombourne</b>							
							No representations received.
<b>GT23 – Glenside, Slade Heath</b>							
							No representations received.
<b>GT32 - Kingswood Colliery, Great Wyrley</b>							
							No representations received.
<b>POLICY SA5: EMPLOYMENT ALLOCATIONS</b>							
Dudley Metropolitan Borough Council	STA24-015-04	Policy SA5	Consider the policy to be sound and supports this policy as it identifies and allocates employment sites that will assist in contributing to the unmet employment land needs of the Black Country.	Yes	Yes	Yes	Comments noted.

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Walsall Council	STA24-049-01	Policy SA5	The employment types to be allowed on the listed sites should refer to class E(g)(ii) and (iii) and exclude offices within class E(g)(i), as offices are a main town centre use.	Not stated	Not stated	Not stated	Reference to use class E(g) is considered appropriate and reflects that office space is often provided ancillary to the main industrial or logistics use.  No change proposed.
City Wolverhampton Council	STA24-012-01	Policy SA5	Planning Practice Guidance encourages strategic Plan-making authorities to identify needs on a Functional Economic Market Area (FEMA) basis. Wolverhampton is located within the Black Country FEMA and a shortfall of 152ha of employment land is identified across the Black Country. Taking all potential supply into account, the WLP Issues and Preferred Options Report confirms a Wolverhampton employment land shortfall of 53ha. The Council supports the SSLP contribution of 112.2ha towards unmet Black Country employment land needs. This contribution will make significant headway towards addressing the unmet employment land needs of the Black Country Functional Economic Market Area of 152ha, of which Wolverhampton is part. As with the housing contribution summarised above, this will need to be confirmed in an updated Statement of Common Ground.	Yes	No	Yes	Comments noted.  A South Staffordshire FEMA SoCG has been agreed and forms part of the submission documents.
Sandwell Council	STA24-038-01	Policy SA5	LATE SUBMISSION Support for the SSLP contribution of 112.2ha employment land towards the Black Country Functional Economic Market Area employment land shortfall	Yes	No	Yes	Comments noted.
Goldfinch Town Planning Services	AGT24-020-01-01	Policy SA5	Main concerns relate to the considerable adverse environmental impacts of this major transport infrastructure scheme, the considerable rural landscape impacts, wildlife habitat destruction, considerable adverse climate change impacts, given the huge levels of Heavy Goods Vehicles (HGV) traffic congestion which will be generated by the scheme. Congestion on local road networks as a result of HGV articulated lorries parking on nearby highway networks during the evenings will also cause considerable environmental problems, etc. The proposals will cause environmental vandalism on an industrial-scale in extensive areas of open countryside near Junction 12 of the M6.  The WMI proposals combined with the delivery of over 4,000 new homes strongly conflict with Article 2 the Human Rights Act which reinforces that "...Everyone's right to life shall be protected by law..." The human rights of those local residents living within nearby established residential estates (located to the east of the WMI) is being substantially harmed and damaged, in clear and direct material breach of Article 2 of the Human Rights Act, which protects a person's right to life. These proposals are therefore breaching the Human Rights of local residents due to the considerable health impacts associated with	No	No	No	Reasonable alternative employment site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Economic Strategy and Site Assessment Topic Paper 2024.  Further consideration of the issues identified will be considered at the planning application stage and mitigation identified where required.  WMI has already been consented through the Development Consent Order (DCO).  The council considered that the submitted local plan meets the test of soundness and complies with human rights legislation.

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			poor air quality. There has been a substantial failure to take on board the Human Rights Act legislation throughout the entire Local Plan Review process. The Council is taking forward a failed, not-fit-for-purpose and insufficiently robust Local Plan Review forward to the later Examination in Public (EIP) stage.				
Staffordshire County Council (Highways)	STA24-044-06	Policy SA5	<p>The employment site E30 (M6, Junction 13, Dunston) wasn't included previously in the Publication Plan 2022 or Preferred Options. Further, consideration will need to be given to the A449 junctions through Penkridge and Stafford depending on the level of trips using these routes.</p> <p>To date, Staffordshire County Council has not seen any evidence through the Local Plan process to suggest that this site can be delivered in transport terms. It is noted that paragraph 6.46 states the site '...will be subject to further detailed scrutiny through the Development Management process.' The Development Management team at Staffordshire CC has requested further assessment work be undertaken as part of the live planning application to demonstrate deliverability of the development, and to the best of our knowledge are awaiting the outcome.</p> <p>Further, it is important that there is a strong Travel Plan in place to ensure opportunities for sustainable travel are provided and encouraged.</p>	Not stated	Not stated	Not stated	<p>Comments noted.</p> <p>Discussions are ongoing between Staffordshire County Council (SCC) highways and the site promoter of M6, Junction 13 as part of the live planning application as set out in the transport SoCG between SCC, City of Wolverhampton Council and National Highways.</p>
Staffordshire County Council (LLFA)	STA24-044-19	Policy SA5	<p>Site ref E18 - ROF Featherstone Flood Zone 2 and FZ 3. Surface water - significant SW flow pathways cross site.</p> <p>ref E24 - I54 Bounds an area of flood zone 2 and flood zone 3</p> <p>ref E33 - West Midlands Interchange Surface water - various surface water flow pathways and ponding. Major and minor.</p>	Not stated	Not stated	Not stated	<p>Comments noted.</p> <p>Sites are existing allocations and/or with planning consent with flood risk considered through the planning application process.</p>
Historic England	STA24-023-01	Policy SA5	<p>Ref E44 - I54 western extension We consider that there is a medium potential for archaeological remains to be found on the site that a mitigation measure should be included which incorporates appropriate archaeological investigation and mitigation to support planning applications pre determination, to be added to the site proforma.</p>	Not stated	Not stated	Not stated	<p><b>Minor modification 069:</b></p> <p>Add in a 'Key Requirements' section to proforma on page 250. Within this include the following:</p> <p>"Any historic environment mitigation for the site, as identified in the council's Historic Environment Site Assessment Stage 2 (2022), including any mitigation required as a result of archaeological investigations."</p>
Historic England	STA24-023-01	Policy SA5	<p>Ref E30 - M6 Junction 13 Three grade II listed buildings adjacent to the proposed</p>	Not stated	Not stated	Not stated	<p><b>Minor modification 068:</b></p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			employment site and the potential for non-designated heritage assets to be impacted by development. We recommend that heritage is included within the 'Key Requirements' of the policy, reflecting the recommendations of the HESA Update 2023 that : care will need to be taken whilst designing any development to ensure that the settings of the Grade II assets, and Dunston Farmhouse in particular are protected; any planning applications should be accompanied by a Heritage Impact Assessment which should consider the potential for both direct and setting impacts; and mitigation measures should include a trial trench evaluation and a geophysical survey in order to address the potential for direct impacts upon any archaeological remains that may be present.				Add in a 'Key Requirements' section to proforma on page 248. Within this include the following:  "Any historic environment mitigation for the site, as identified in the council's Historic Environment Site Assessment Update (2023), including any mitigation required as a result of archaeological investigations."
Savills UK Ltd for St Modwen & JM Holt	AGT24-037-04-15	Policy SA5	We strongly support M6 Junction 13, Dunston (E30) being included as a draft employment allocation in the Publication Plan. The Site is a non-Green Belt strategic employment opportunity located on Junction 13 of the M6. A Planning Application for Outline Planning Permission was submitted to SSDC in December 2023 (reference 23/01080/OUTMEI) which demonstrates the site's deliverability. Subject to approval of the outline planning permission and subsequent reserved matters, the site is capable of delivering employment floorspace in the short term. The proposal will provide a significant number of key benefits for the local community and wider district	Yes	No	No	Comments noted.
Nurton Development Ltd	AGT24-029-01-03	Policy SA5	Assessment of Hilton Park at Junction 11 of M6 is flawed. The site includes a number of significant advantages including access to M6 Junction 11 and its location to principle settlements in the area (Black Country, Cannock, Stafford and Lichfield) giving good access to labour supply. The site is a large site strategic in scale and regular shaped and free of major constraints. The locational advantages of the site improve when the M54/M6 link road is built.  JLL Technical note on deliverability produced with analysis by expert consultants covering transportation, drainage, ecology, utilities and services, topography and masterplanning demonstrate that the site is deliverable. Concerned that the information supplied has not been taken into account in site assessment.  Site scored highly in the 2021 West Midlands Strategic Employment Sites Study and presents a better opportunity than the proposed allocation at Junction 13 due to its location and meeting the WMSESS criteria in terms of scale. Concern that the Council's Green Belt assessment has not taken account of the approved M54/M6 link road in updating the Green Belt assessment harm rating for the site.	No	No	No	All representations have been read and taken on board as the plan has progressed  Reasonable alternative employment site options (including omission site ref E43 at Junction 11, M6) have been assessed against a consistent set of planning criteria, including site constraints and opportunities, to determine proposed allocations as set out in our Economic Strategy and Site Assessment Topic Paper 2024. The Council can meet its employment land requirement and make a proportionate contribution to cross boundary needs without release of Green Belt, and therefore the exceptional circumstances for its release do not exist as detailed in our Exceptional Circumstances Topic Paper 2024.  No change proposed.



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Stafford Borough Council	STA24-043-01	Policy SA5	The Borough Council notes Policy DS6 which includes the employment allocation at M6 Junction 13, Dunston for 17.6 hectares of employment types E(g), B2 and B8 south of the Stafford Borough boundary which could bring economic benefits to the locality provided it is delivered alongside a robust transport and connectivity strategy.	Yes	No	Yes	Comments noted.
CPC for Cordage 41 Ltd	AGT24-013-01-01	Policy SA5	<p>E62 – Land adjacent to Four Ashes Inn, Station Road The Council has rejected the suggested allocation due to reasons stated in Paragraph 4.3 Employment Land Site Assessment Topic Paper.</p> <p>The site is located in Four Ashes, a settlement with a significant amount of employment land. It benefits from good road and rail links, reflected in the fact the Council is proposing to allocate 297 hectares of greenfield land to the north for B8 use (West Midlands Interchange). The logic of including Four Ashes with WMI is inescapable (map to show emerging allocation). The site is located within the Green Belt as is WMI. The Employment Site Selection Topic Paper recognises the proposed rail link and the same justification should be applied to Four Ashes. There is no reason on Green Belt or sustainability grounds for not allocating the land behind the Four Ashes public house for employment purposes. The land put forward was playing fields although never owned by the community and not used for a local club. The adult pitch was no longer in use by 2020 and use of all fields ceased at the onset of the pandemic. The SSDC Playing Pitch Strategy (2020) confirms there is no unmet demand for pitches and there is currently spare capacity across South Staffordshire. Fields that are disused for 5 years become lapsed and fall outside of Sport England’s remit. It is likely the adult pitch has been disused for 5 years and the children’s pitch for 4 years, with no local interest to bring them back into use. The pitches are clearly surplus to requirements. Further information regarding the pitch use and relevance to WMI can be found in the full representation.</p> <p>The Council has confirmed that the latest available evidence suggests there is still a substantial need for the WMI to contribute towards the unmet needs of the Black Country, and on this basis the Plan should take every opportunity to maximise delivery of employment land at Four Ashes. The evidence clearly indicates a substantial requirement for employment land at Four Ashes to meet the needs of all the Black Country authorities. The former pitches will help to supplement the supply of B8 land. National Policy supports the redevelopment of former pitches as set out above, whilst the Council has confirmed this is a sustainable location for an employment allocation. The inclusion of an employment allocation of the former playing fields at Four Ashes would contribute to the Plan being found sound.</p>	Yes	No	Yes	<p>Site E62 Land adjacent to Four Ashes Inn, Station Road was scoped out for further assessment in the Economic Strategy and Employment Site Assessment Topic Paper (2024). This site is considered not suitable, in line with the approach in the council’s SHELAA, due to currently being an identified playing pitch. Although it is currently of poor quality it cannot be assumed that upgrades are not possible, and so even if the playing pitch has lapsed policy protection is still applied</p> <p>Notwithstanding this, The Council can meet its employment land requirement and make a proportionate contribution to cross boundary needs without release of Green Belt, and therefore the exceptional circumstances for its release do not exist as detailed in our Exceptional Circumstances Topic Paper 2024.</p> <p>No change proposed.</p>

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Sheppard Planning for Bericote	AGT24-039-01-02	Policy SA5	<p>Please see accompanying report.</p> <p>The Green Belt Boundaries are not justified (NPPF35b) as they fail to take into account the urbanising influence of West Midlands Interchange.</p> <p>There is no choice or flexibility in the Employment Land supply, as only sites E18 and E30 are available for small to mid-box B8 development, and ROF Featherstone has delivery issues. This is not consistent with several points of national policy (NPPF35d). Sites have not been selected based on appropriate evidence. The evidence base consistently scored Site E30 much lower than Sites E51a and E51b. Allocating site E30 is both illogical and counter to the evidence supporting those allocations. Development of site E51a would create in the region of 325 jobs on site and produce GVA of up to £23.8m per annum when operational. This site offers a rare combination of highly sustainable development, on buildings aimed at the local market.</p> <p>The Gravelly Way site should be removed from the Green Belt and allocated for employment Development.</p>	Yes	No	Yes	Omission sites ref E51a and E51b have been assessed against a consistent set of planning criteria as set out in our Economic Strategy and Site Assessment Topic Paper 2024. The Council can meet its employment land requirement and make a proportionate contribution to cross boundary needs without release of Green Belt, and therefore the exceptional circumstances for its release do not exist as detailed in our Exceptional Circumstances Topic Paper 2024.
Savills UK Ltd for Taylor Wimpey	AGT24-037-05-13	Policy SA5	<p>Taylor Wimpey supports the retention of the adopted ROF Featherstone allocation where the Plan includes the land (Cross Green) needed to deliver the access road. SSDC decision to remove the residential-led allocation at Cross Green and the implications on the delivery of ROF Featherstone site have not been considered within the evidence base which Taylor Wimpey objects to.</p> <p>Taylor Wimpey supports the re-allocation of ROF Featherstone where the draft allocation on Land at Cross Green is also included to deliver the highways infrastructure and homes to serve the jobs being created.</p>	Not stated	No	Not stated	ROF Featherstone employment site is not in the Green Belt and benefits from a reserved matters planning consent (ref 23/00378/REM) and therefore the council is very confident of its deliverability.
Pegasus Group for Clowes Developments	AGT24-030-02-01	Policy SA5	<p>Clowes land interests extend to 71.2 hectares and the masterplan at Appendix 2 demonstrates how a range of B2 and B8 uses could be delivered on the site with a combined floor area of 84,844 square metres. The site is deliverable, on a principal commuting route on the edge of a conurbation and it could help deliver improvements to the A449/B4176 road junction. It has the potential to deliver a meaningful contribution to new employment provision within South Staffordshire. Site details can be found in paragraphs 2.11 – 2.14 of the full representation (employment).</p>	No	No	No	<p>Omission site ref E56 have been assessed against a consistent set of planning criteria as set out in our Economic Strategy and Site Assessment Topic Paper 2024. The Council can meet its employment land requirement and make a proportionate contribution to cross boundary needs without release of Green Belt, and therefore the exceptional circumstances for its release do not exist as detailed in our Exceptional Circumstances Topic Paper 2024.</p> <p>No change proposed.</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
CPRE Staffordshire	STA24-013-05	Policy SA5	Significant and highly visible greenfield site. Site occupies best and most productive agricultural land, Site in close proximity to Stafford Borough however no evidence that Duty to Cooperate duties have been undertaken with Stafford Borough in relation to this site. EDNA indicates that there is sufficient land to meet South Staffordshire employment land requirements in addition to making a significant contribution towards meeting cross boundary needs of the West Midlands conurbation. CPRE do not believe that the allocation of this site is justified.	Not stated	No	No	The proposed allocation at M6, Junction 13 has been proposed for allocation based on a balanced judgement having regard to a number of considerations and covered in our Economic Strategy and Site Assessment Topic Paper 2024. These include site specific credentials and that it is the only significant site that has been put forward at a key motorway junction in the district on land outside of the Green Belt; shortfalls of employment land in the wider FEMA; and regional evidence of strong demand. Allocating M6 Junction to compliment other sites in the pipeline ensures a strategy that positively and proactively encourages sustainable economic growth.  No change proposed.
Cashmore, R (Dunston Local Plan Development Committee)	RES24-035-01	Policy SA5	Site ref E30 <ul style="list-style-type: none"> <li>- EDNA identifies 62.4ha employment land required, but table 9 in the plan states there is 102.7. Excess of 40.3ha</li> <li>- Land at J13 is subject to several planning restrictions regarding flooding and major infrastructure advancements and would be restricted with employment usage.</li> <li>- A concluding statement from the West Midlands Rail Freight Interchange Order identifies the site as unsuitable, Dunston was identified as potentially suitable for a SRFI development. This was assessed as a two-stage process and concluded that 'the combined impacts on Dunston's rural character, as well as the effects on the local amenity, make the site unsuitable.</li> <li>- Plan is not a deliverable or viable option . Concerns from multiple bodies about safety (flooding issues, sewage pipes, road safety) and the risk of the development make the site inappropriate for development.</li> <li>- Goes against NPPF's statement about conservation of the natural environment and recognition of intrinsic beauty of the countryside. This site would intrude on that in the area and cause major air pollution.</li> <li>- Site is currently being used for agriculture and is a versatile site, so concreting over it to introduce large industrial units would lose part of local heritage.</li> </ul> <p>Developing warehouses on agricultural land is completely against the governments policies. Would impede on an AONB. Also there has been no opportunity to comment on the inclusion of the site so far</p>	No	No	No	The proposed allocation at M6, Junction 13 has been proposed for allocation based on a balanced judgement having regard to a number of considerations and covered in our Economic Strategy and Site Assessment Topic Paper 2024. These include site specific credentials and that it is the only significant site that has been put forward at a key motorway junction in the district on land outside of the Green Belt; shortfalls of employment land in the wider FEMA; and regional evidence of strong demand. Allocating M6 Junction to compliment other sites in the pipeline ensures a strategy that positively and proactively encourages sustainable economic growth.  The applicants for WMI did consider a much wider land parcel at Dunston as part of their alternative site assessment and discounted it, however this was for very large scale SFRI and therefore is not comparable.  Site E30 has been assessed through a number of versions of the council's employment site assessment topic paper, as well as being assessed as a reasonable alternative through the Sustainability Appraisal. The Local Plan is an iterative process that considers and responds to consultation responses and updated evidence as it is progressed, and therefore it is considered wholly appropriate to make changes between Regulation 18 and Regulation 19 consultation

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**CHAPTER 6 & POLICIES MA1-SA5: SITE ALLOCATIONS**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							stages. No change proposed.
National Highways	STA24-032-01	Policy SA5	<p>The allocation quantum for the West Midlands Interchange site has now been fully captured to cover for the Plan Period in the latest version. However, we acknowledge that this site already consents through the Development Consent Order process, including the requisite mitigation measures pertaining to the SRN. Similarly, the ROF Featherstone site is also consented and mitigation pertaining to the A449 agreed.</p> <p>We note that a new strategic employment allocation has been included near M6 J13 with a quantum of 17.6 ha alongside the employment sites identified previously. Considering the proximity to the site, the greatest traffic impact is expected to be at the M6 J13. It is also noted that the north-east boundary of the site abuts the M6 in the area.</p> <p>I54 Western Extension - potential boundary impacts (landscape, air, noise, drainage, etc.) on the M54 and potential traffic impacts on M54 J2.</p> <p>M6 Junction 13, Dunston - potential boundary impacts (Landscape, air, noise, drainage, etc.) on the M6 and potential traffic impacts on M6 J13.</p>	Not stated	Not stated	Not stated	<p>Comments noted</p> <p>A transport SoCG between National Highways, Staffordshire County Council highways and City of Wolverhampton highways is in the process of being agreed.</p>
Cashmore, P & R	RES24-036-09	Policy SA5	<p>Total of B2 Class land: 16.7ha Total of B8 Class Land: 350.6ha. B8 Land allocated is exceeding without adding J13 to the quota. Also, there isn't an additional need locally for this type of employment.</p>	No	No	No	<p>The proposed allocation at M6, Junction 13 has been proposed for allocation based on a balanced judgement having regard to a number of considerations and covered in our Economic Strategy and Site Assessment Topic Paper 2024. These include site specific credentials and that it is the only significant site that has been put forward at a key motorway junction in the district on land outside of the Green Belt; shortfalls of employment land in the wider FEMA; and regional evidence of strong demand. Allocating M6 Junction to compliment other sites in the pipeline ensures a strategy that positively and proactively encourages sustainable economic growth.</p> <p>No change proposed.</p>
Harvey-Stephens, R	RES24-100-04	Policy SA5	<p>Inclusion of Map E30 Policy EC1 states 'Employment proposals should be accessible via sustainable travel modes, including clear and legible walking and cycling routes' This site does not support sustainable travel modes, the cycling and walking routes are very poorly</p>	No	No	No	<p>Site E30 will be accessible by sustainable transport modes, however there may be scope to improve these through planning obligations.</p> <p>Site E30 has been assessed through a number of</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>maintained and public transport to the site is limited to an hourly service and less at weekends, this is not suitable for an employment location involving 24 hr shift work. The site would increase the use of private vehicles and increase carbon emissions which is contradictory to the statements in 10.8 This site should be rejected it is not sound.</p> <p>Removing or re-routing bridleways and public rights-of-ways through an industrial estate would diminish the health and wellbeing of residents and users of these pathways. St Leonards First School Dunston will be directly affected if the land is approved for employment land, reducing their opportunities to use the countryside adjacent to their school, increasing pollution, destroying nature, reducing choices, contravening the government plan.</p> <p>Map E30 was not included on the Policy Proposal Maps published alongside the Publication Plan consultation 2022 but does appear on the Publication Plan 2024. Policies Maps in the Local plan review. This add-on has denied residents the chance to oppose the inclusion at the earlier consultation stages.</p> <p>see - Employment Sites: Site Assessment Topic Paper September 2021 and Economic Strategy &amp; Employment Site Assessment Topic Paper November 2022</p> <p>This contravenes 'Preparation of the Local Plan 21. Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012</p> <p>This site should be rejected as consultation process not followed.</p>				<p>versions of the council's employment site assessment topic paper, as well as being assessed as a reasonable alternative through the Sustainability Appraisal. The Local Plan is an iterative process that considers and responds to consultation responses and updated evidence as it is progressed, and therefore it is considered wholly appropriate to make changes between Regulation 18 and Regulation 19 consultation stages.</p> <p>No change proposed.</p>
Martin, F	RES24-143-01	Policy SA5	<p>Strongly Oppose this and 23/01080/OUTMEI.</p> <p>The land ear marked for employment will be huge warehouses, on Grade 2 farmland, home to wildlife and endangered species. Footpaths and Bridle Paths behind a Primary School. Encroaching on a rural country village and countryside. Noise/Light/Air pollution will be detrimental. Air Pollution, the government are trying to tackle this with grants to councils to major health problems in the young and old.</p>	No	No	No	<p>The proposed allocation at M6, Junction 13 has been proposed for allocation based on a balanced judgement having regard to a number of considerations and covered in our Economic Strategy and Site Assessment Topic Paper 2024. These include site specific credentials and that it is the only significant site that has been put forward at a key motorway junction in the district on land outside of the Green Belt; shortfalls of employment land in the wider FEMA; and regional evidence of strong demand. Allocating M6 Junction to compliment other sites in the pipeline ensures a strategy that positively and proactively encourages sustainable economic growth.</p> <p>No change proposed.</p>
CBRE for Land Project UK	AGT24-009-02-	Policy SA5	<p>Request that the council allocate further employment sites within the draft plan.</p>	Yes	Yes	Yes	<p>The Council's 2022 Economic Development Needs Assessment (EDNA) and 2024 EDNA update are</p>



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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
	01		The NPPF sets out that planning policies should create conditions in which businesses can expand and adapt. This site takes account of local employment needs in a sustainable and suitable location for development. This importance will continue to grow over the coming decades fuelled by the increasing prevalence of e-commerce, the re-shoring of production into the UK to avoid supply chain disruption, and population growth. However, the UK continues to underprovide logistics sites, despite record demand from a variety of sectors in recent years. This has placed the UK warehouse market under significant pressure with demand continuing to outstrip supply.				considered robust assessments and the 62.4ha need figure and 107.45 supply figure are deemed reliable. The EDNA does consider both labour demand and past trends when arriving at a robust objectively assessed need figure for the district.  The approach in the plan of meeting our own objectively assessed needs for employment land and a substantial contribution to wider unmet needs is appropriate and ensures a strategy that positively and proactively encourages sustainable economic growth.
CBRE	AGT24-009-01-01	Policy SA5	Object to the soundness of the Local Plan in relation to the four tests of soundness set out within the NPPF. The key element of objection relates to the wash over of Allocation E33 (WMI) with Green Belt. Other matters relate to Development Management Policies EC1, EC2, NB6B and NB6C.  Proposed the following re-wording of the policies set out below (additional text in bold, removal of text strike through):  - Policy SA5: The WMI employment site allocation (E33) is for a Strategic Rail Freight Interchange (SRFI) and will be progressed in-line with the Development Consent Order (DCO) that was granted permission on 4 May 2020. <b>As noted, the DCO was implemented in July 2023.</b> WMI remains washed over by Green Belt.	Yes	No	Yes	WMI is allocated for employment development in line with the DCO consent, however, will remain washed over by Green Belt. This will provide certainty that the site will come forward in accordance with the DCO, reducing the risk that alternative forms of development could come forward. The council will continue to work positively with the developers on WMI to ensure the site comes forward in accordance with the DCO and delivers the best scheme possible.  It is recognised that the DCO has been implemented, however it is not considered necessary to reference this in the policy.  No change proposed.
Cashmore, P & R	RES24-036-09	Policy SA5 (Appendix E)	Site reference E30 shows a strip of land only adjacent to A449. With the amount of screening required and re-routing of public footpaths and bridleways, would question the overall viability of the site at the reduced size. NPPF 16 (b) states plans should be prepared positively, in a way that is aspirational and deliverable. This is not a deliverable plan as we are already aware of the constraints from Network Rail, National Highways, Severn Trent Water and Staffordshire County Council Flood Risk Management Team during the application for the development of warehouses on the same site.	No	No	No	Council has no reason to suspect the site is unviable, given its greenfield location and proximity of Junction 13, meaning it will be attractive to the logistics market.  More detailed matters will be considered through the development management process.  No change proposed.
Harper-Wallis, S	STA24-022-03	Policy SA5 (Appendix E)	Allocation E30 faces issues, from feasibility to policy compliance. Unused WMI employment land questions the need for this allocation.  NB1, NB2: Significant infrastructure is required, old hedgerows must be removed, and achieving a 10% net biodiversity gain would reduce the site's feasibility for warehousing.	No	No	No	The council Economic Development Needs Assessment (EDNA) 2022 and EDNA update 2024 support a claim of 18.8ha of WMI to meet our labour demand. The council has not seen evidence to support a higher claim on the site.  Whilst some site constraints (e.g. heritage impact) are present, as they will be for all sites,

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>NB4: The site's size rivals a nearby village, and the required screening to comply is unachievable.</p> <p>NB8: The site, near a graded building and historic Dunston, would struggle to mitigate heritage impacts, affecting viability.</p> <p>Unused employment land at WMI questions the basis for this allocation. This site should be reconsidered until WMI allocations are fully utilised.</p> <p>Site E30 should be removed from the plan as it poses the most harm and its viability is in question.</p>				<p>there is nothing to suggest that these are hard constraints that cannot be mitigated through appropriate design and/or mitigation measures.</p> <p>No change proposed.</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
Webb, L	RES24-248-06	7.1	It is important to create a well balanced mix throughout the plan period, rather than specifically target smaller housing. There has been a change in attitude toward working from home, creating a need for larger products in the market. A wide range of dwellings should be proposed through the plan.	Not stated	Not stated	Not stated	Policy HC1 encourages a mixture of dwelling types, sizes and tenure. The Housing Market Assessment's LTBHM model includes the use of occupation patterns of households in the district and how they are changing, both in terms of tenure and property size. The output of the model therefore provides a robust assessment of the appropriate mix of housing required over the plan period.  No change proposed.
Robins, D	RES24-199-01	7.1	The plan does not address the needs of the local community nor the environment and potentially will turn Wombourne from a village to a town. The amount of buildings on one plot of land ought to be reduced, particularly Poolhouse Rd. 'Affordable' ought to stipulate an absolute ceiling level, far too many new builds deemed affordable by developers/planning authorities are not and therefore do not address the purpose of this plan.  The plan acknowledges local housing deficit/need, but the only way to address this at a local level is to build primarily social housing for those currently on long, local waiting lists. New private developments in Wombourne result in people moving into the area from elsewhere, further exacerbating both housing need for those unable to buy and the lack of supporting infrastructure.	Yes	No	No	Affordable housing refers to the planning definition set out in the NPPF i.e. affordable housing for rent, starter homes, discounted market sales housing and other affordable routes to home ownership. All major housing development will be required to provide affordable housing which meets this definition, which includes social rented housing, in accordance with Policy HC3.  No change proposed.
Marsh, T	RES24-141-05	7.6	Due to the location of Wombourne I am not sure how the homes are going to be affordable. The houses in this location are generally a higher price. The houses next to the land and opposite the proposed site are of a high value. How will this be in keeping with its surroundings.	Yes	No	No	Affordable housing refers to the planning definition set out in the NPPF i.e. affordable housing for rent, starter homes, discounted market sales housing and other affordable routes to home ownership. All major housing development will be required to provide affordable housing which meets this definition in accordance with Policy HC3.  No change proposed.
West Midlands Housing Association Planning Consortium (Tetlow King)	STA24-050-02	7.6	It would be beneficial to see the Council recognise the role of Housing Associations and encourage developers to have early active engagement with Housing Associations in the preparation of planning proposals. Early engagement enables Housing Associations to have an active role in the planning and design of developments to ensure that the development addresses local housing needs and meets the management requirements of WMHAPC members.	Not stated	Not stated	Not stated	The Council values the role that housing associations play in designing and delivering affordable housing in the district. Early engagement of developers with housing associations has and will continue to be encouraged; further guidance on this will be provided in the Affordable Housing SPD.  No change proposed.
<b>POLICY HC1: Housing Mix</b>							
PlanIT Planning &	AGT24-	Policy	Policy HC1 is overly prescriptive. Policy HC1 should not impose a	Yes	No	Yes	The Council considers that the requirement for

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
Development for Hampton Oak Developments	034-02-06	HC1	<p>minimum requirement that 70% of dwellings on new housing schemes should be 3 bedrooms or less.</p> <p>The Council's HMA considers the mix requirements for the South Staffordshire element of the housing requirement only, not the Black Country and Birmingham's.</p> <p>We object to the suggestion that S.106 agreements will be used to secure the mix of outline planning applications.</p>				<p>70% of market housing to provide 3 bedrooms or less provides a suitable balance between meeting local housing need for smaller properties (as evidenced by the Housing Market Assessment), providing certainty to developers and landowners of the Council's expectations, and also providing sufficient flexibility to reflect individual site circumstances.</p> <p>Chapter 5 of the 2024 Housing Market Assessment update sets out how the type and tenure of future housing need has been calculated. This includes the district's local housing need and the 640-home contribution to wider unmet need. The mix of housing for both elements of the Council's housing requirement has therefore been suitably modelled.</p> <p>Housing mix will be secured at outline stage either via condition or S106 agreement. This approach ensures developers and landowners are made aware of the Council's expectations at an early stage and can be taken into consideration for land transactions. The Council views this an appropriate approach to ensure sites meet local housing need and to safeguard the deliverability of sites.</p> <p>No change proposed.</p>
Staffordshire County Council	STA24-044-01	Policy HC1	<p>The Plan has good coverage in relation to Health and Well-being in general, which is acknowledged.</p> <p>The data shows that the District has an increasingly ageing population. This is referred to well across the document and the Plan seeks to address it with proposals for specialist elderly housing, and with references to accessible and adaptable homes. However, given the demographics this we believe this could have gone further. For example, using the homes for life idea there is scope for development of housing for all, where people are able to grow old with minor adaptations.</p>	Yes	Yes	Yes	<p>Comments noted.</p> <p>Policy HC4 confirms that 100% of dwellings will be required to meet Part M4(2) of Building Regulations. The Council considers this will make a significant contribution to meeting the needs of older people, both now and also into the future, by allowing easier adaptations to properties as the needs of households change over time.</p> <p>No change proposed.</p>
First City for St Mary's Presbytery and The Archdiocese of Birmingham	AGT24-018-01-04	Policy HC1	<p>Do not agree with the plan being too prescriptive which could potentially hinder the delivery of sites. The requirement that 70% of properties comprise of three-bedrooms or less is restrictive and does not afford the flexibility expected by NPPF Paragraph 63 in order to meet the need to provide for a range of size, type, and tenure for different groups.</p>	Yes	No	Yes	<p>The Council considers that the requirement for 70% of market housing to provide 3 bedrooms or less provides a suitable balance between meeting local housing need for smaller properties (as evidenced by the Housing Market Assessment), providing certainty to developers and landowners of the Council's expectations, and also providing sufficient flexibility to reflect individual site circumstances.</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							No change proposed.
Avison Young for Crest Nicholson	AGT24-004-02-03	Policy HC1	<p>Policy states that major housing development sites “must” include a minimum of 70% of properties with 3 bedrooms or less. Policy HC1, as worded, is inflexible and could impact on the delivery of much needed homes. Policy HC1 should, therefore, be amended to state that major developments “should” provide a minimum of 70% of properties with three bedrooms or less, unless an alternative housing mix can be justified by other more up to date evidence of need, for example, evidence of current market demand and more up to date local needs assessments.</p> <p>The section of Policy HC1 which states that development which fails to make efficient use of land by providing a ‘disproportionate’ amount of large 4+ bed houses is ambiguous (i.e. it is unclear how a decision maker should react to development proposals and what might be considered disproportionate). This section of Policy HC1 should, therefore, be deleted.</p>	Yes	No	Not stated	<p>The Council considers that the requirement for 70% of market housing to provide 3 bedrooms or less provides a suitable balance between meeting local housing need for smaller properties (as evidenced by the Housing Market Assessment), providing certainty to developers and landowners of the Council’s expectations, and also providing sufficient flexibility to reflect individual site circumstances. The requirement for plans to be reviewed in full or in part every 5 years will provide the opportunity to update the 70% requirement, should the latest Housing Market Assessment indicate this to no longer be appropriate.</p> <p>Policy HC1 is clear that mix of developments should be informed by the Housing Market Assessment, which provides a detailed breakdown of the size of properties required in each sub-area of the district. This section of Policy HC1 specifically references a disproportionate amount of 4+ bed homes “compared with local housing need”. The Council therefore considers the policy wording provides sufficient clarity on this matter.</p> <p>No change proposed.</p>
Acres Land and Planning for Hallam Land Management	AGT24-001-01-01	Policy HC1	<p>Not necessarily appropriate for each site to display variety and choice and for there to be a specific requirement for 70% of properties to be 3 bedrooms or less. We suggest you remove the requirement for 70% of properties to have 3 bedrooms or less. Moreover, sites of less than 10 dwellings should not be required to provide a mixture of property sizes.</p>	Not stated	No	Not stated	<p>The National Design Guide is clear that well-designed places provide a mixture of property types and sizes to meet varying needs. This is not restricted to major developments; smaller developments will also make an important contribution to creating mixed and balanced communities.</p> <p>The Council considers that the requirement for 70% of market housing to provide 3 bedrooms or less provides a suitable balance between meeting local housing need for smaller properties (as evidenced by the Housing Market Assessment), providing certainty to developers and landowners of the Council’s expectations, and also providing sufficient flexibility to reflect individual site circumstances.</p> <p>No change proposed.</p>



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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
Cerda for Trine Developments	AGT24-011-01-01	Policy HC1	Sites of less than 10 units providing a mixture of property sizes and reflecting the HMA could cause issues for smaller plots within larger allocations, and might mean that smaller parcels do not integrate with the wider allocation. The policy should offer more flexibility and exclude sites which are strategic allocations and subject to master-planning.	Yes	No	Yes	<p>The National Design Guide is clear that well-designed places provide a mixture of property types and sizes to meet varying needs. This is the case for all sizes of development. Site specific circumstances which may preclude a mixture of property sizes being provided on smaller sites are accounted for with the stipulation in the policy of “where consistent with other local plan policies”.</p> <p>The Council considers it appropriate and achievable for strategic allocations to meet the requirements of this policy as part of the master-planning process.</p> <p>No change proposed.</p>
Gladman Developments Ltd	AGT24-019-01-01	Policy HC1	Policy HC1 could benefit from a further degree of flexibility to ensure it remains a sound policy over the lifetime of the Plan. It would be appropriate for the policy to include consideration of elements such as the demand/need at the time of a planning application. The requirement for 70% of market housing to have 3-bedrooms or less should be removed from the policy wording as it is overly prescriptive and could frustrate planning applications from being able to respond positively to local needs at the time of the application	Not stated	No	No	<p>The Housing Market Assessment will be updated on a regular basis to provide an up-to-date picture of local housing need, and Policy HC1 confirms developments should reflect the latest version of this document. This ensures the policy remains sound over time.</p> <p>The Council considers that the requirement for 70% of market housing to provide 3 bedrooms or less provides a suitable balance between meeting local housing need for smaller properties (as evidenced by the Housing Market Assessment), providing certainty to developers and landowners of the Council’s expectations, and also providing sufficient flexibility to reflect individual site circumstances. The requirement for plans to be reviewed in full or in part every 5 years will provide the opportunity to update the 70% requirement, should the latest Housing Market Assessment indicate this to no longer be appropriate.</p> <p>No change proposed.</p>
Avison Young for Beard, G	AGT24-004-01-02	Policy HC1	Our client objects to the policy as drafted. 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.	No	No	No	<p>The Council considers that the policy as drafted provides a suitable balance between meeting local housing need for smaller properties (as evidenced by the Housing Market Assessment), providing certainty to developers and landowners of the Council’s expectations, and also providing sufficient flexibility to reflect individual site circumstances and any changes in need over time.</p> <p>No change proposed.</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
Pegasus Group for BDW Trading Ltd	AGT24-031-01-03	Policy HC1	Lack of flexibility in the policy in terms of requiring 70% of properties to be 3 bedrooms or less is not justified. The most suitable and appropriate manner to assess housing mix is by determination of the market at the time of submission of a planning application, rather than at the point of adoption of the Local Plan. Furthermore, needs and demand will vary from area to area and site to site. Indeed, there may be instances when a site is wholly suitable for a different housing mix than currently prescribed by the policy.	Not stated	No	Not stated	<p>The Council considers that the requirement for 70% of market housing to provide 3 bedrooms or less provides a suitable balance between meeting local housing need for smaller properties (as evidenced by the Housing Market Assessment), providing certainty to developers and landowners of the Council's expectations, and also providing sufficient flexibility to reflect individual site circumstances.</p> <p>The Housing Market Assessment will be updated on a regular basis to provide an up-to-date picture of local housing need, and Policy HC1 confirms developments should reflect the latest version of this document. This ensures the policy remains sound over time. The requirement for plans to be reviewed in full or in part every 5 years will provide the opportunity to update the 70% requirement, should the latest Housing Market Assessment indicate this to no longer be appropriate.</p> <p>No change proposed.</p>
RCA Regeneration for Barberrry Developments	AGT24-036-01-02	Policy HC1	We agree with Policy HC1 and the need to deliver a strong housing mix that meets the needs of a variety of different households, regarding bedroom numbers and mix. However, we would urge flexibility in its application where there are clear vagaries in the housing market throughout the authority.	No	No	No	Comments noted.
RCA Regeneration for Seven Capital	AGT24-036-03-02	Policy HC1	We agree with Policy HC1 and the need to deliver a strong housing mix that meets the needs of a variety of different households, regarding bedroom numbers and mix. However, we would urge flexibility in its application where there are clear vagaries in the housing market throughout the authority.	Not stated	No	No	Comments noted.
RCA Regeneration for Richborough Estates	AGT24-036-02-02	Policy HC1	We agree with Policy HC1 and the need to deliver a strong housing mix that meets the needs of a variety of different households, regarding bedroom numbers and mix. However, we would urge flexibility in its application where there are clear vagaries in the housing market throughout the authority.	Not stated	No	No	Comments noted.
Evolve Planning & Design for Lovell Homes	AGT24-017-05-04	Policy HC1	<p>Lovell Homes would wish to raise concerns that the proposed direction of travel appears overly prescriptive with all market housing proposals to include 70% of properties to comprise three bedrooms or less.</p> <p>The SHMA utilises a long-term balancing housing market (LTBHM) model to determine future demand for housing. Lovell Homes would question whether this model does actually determine demand rather than need. The demand is often for a larger open market property than a household may need to provide additional flexibility e.g. working from home. Therefore,</p>	Yes	No	Yes	<p>The Council considers that the requirement for 70% of market housing to provide 3 bedrooms or less provides a suitable balance between meeting local housing need for smaller properties (as evidenced by the Housing Market Assessment), providing certainty to developers and landowners of the Council's expectations, and also providing sufficient flexibility to reflect individual site circumstances.</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			the approach to capping the percentage of larger homes, particularly open market homes, fails to provide a good level of flexibility to allow for changing market signals across the plan period or to address varying needs in different locations within the District.				<p>The LTBHM model includes the use of occupation patterns of households in the district and how they are changing, both in terms of tenure and property size. The output of the model therefore provides a robust assessment of the appropriate mix of housing required over the plan period.</p> <p>The requirement for plans to be reviewed in full or in part every 5 years will provide the opportunity to update the 70% requirement, should the latest Housing Market Assessment indicate this to no longer be appropriate.</p> <p>No change proposed.</p>
Evolve Planning & Design for Keon Homes	AGT24-017-04-04	Policy HC1	<p>Keon Homes would wish to raise concerns that the proposed direction of travel appears overly prescriptive with all market housing proposals to include 70% of properties to comprise three bedrooms or less.</p> <p>The SHMA utilises a long-term balancing housing market (LTBHM) model to determine future demand for housing. Keon Homes would question whether this model does actually determine demand rather than need. The demand is often for a larger open market property than a household may need to provide additional flexibility e.g. working from home. Therefore, the approach to capping the percentage of larger homes, particularly open market homes, fails to provide a good level of flexibility to allow for changing market signals across the plan period or to address varying needs in different locations within the District.</p>	Yes	No	Yes	<p>The Council considers that the requirement for 70% of market housing to provide 3 bedrooms or less provides a suitable balance between meeting local housing need for smaller properties (as evidenced by the Housing Market Assessment), providing certainty to developers and landowners of the Council's expectations, and also providing sufficient flexibility to reflect individual site circumstances.</p> <p>The LTBHM model includes the use of occupation patterns of households in the district and how they are changing, both in terms of tenure and property size. The output of the model therefore provides a robust assessment of the appropriate mix of housing required over the plan period.</p> <p>The requirement for plans to be reviewed in full or in part every 5 years will provide the opportunity to update the 70% requirement, should the latest Housing Market Assessment indicate this to no longer be appropriate.</p> <p>No change proposed.</p>
Evolve Planning & Design for Four Ashes Road Ltd	AGT24-017-03-04	Policy HC1	<p>Four Ashes Road Limited would wish to raise concerns that the proposed direction of travel appears overly prescriptive with all market housing proposals to include 70% of properties to comprise three bedrooms or less.</p> <p>The SHMA utilises a long-term balancing housing market (LTBHM) model to determine future demand for housing. Four Ashes Road Ltd would question whether this model does actually determine demand rather than need. The demand is often for a larger open market property than a household may need to provide additional flexibility e.g. working from home. Therefore, the approach to capping the percentage of larger homes,</p>	Yes	No	Yes	<p>The Council considers that the requirement for 70% of market housing to provide 3 bedrooms or less provides a suitable balance between meeting local housing need for smaller properties (as evidenced by the Housing Market Assessment), providing certainty to developers and landowners of the Council's expectations, and also providing sufficient flexibility to reflect individual site circumstances.</p> <p>The LTBHM model includes the use of occupation</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			particularly open market homes, fails to provide a good level of flexibility to allow for changing market signals across the plan period or to address varying needs in different locations within the District.				<p>patterns of households in the district and how they are changing, both in terms of tenure and property size. The output of the model therefore provides a robust assessment of the appropriate mix of housing required over the plan period.</p> <p>The requirement for plans to be reviewed in full or in part every 5 years will provide the opportunity to update the 70% requirement, should the latest Housing Market Assessment indicate this to no longer be appropriate.</p> <p>No change proposed.</p>
Evolve Planning & Design for Cameron Homes	AGT24-017-02-01	Policy HC1	<p>Cameron Homes would wish to raise concerns that the proposed direction of travel appears overly prescriptive with all market housing proposals to include 70% of properties to comprise three bedrooms or less.</p> <p>The SHMA utilises a long-term balancing housing market (LTBHM) model to determine future demand for housing. Cameron Homes would question whether this model does actually determine demand rather than need. The demand is often for a larger open market property than a household may need to provide additional flexibility e.g. working from home. Therefore, the approach to capping the percentage of larger homes, particularly open market homes, fails to provide a good level of flexibility to allow for changing market signals across the plan period or to address varying needs in different locations within the District.</p>	Yes	No	Yes	<p>The Council considers that the requirement for 70% of market housing to provide 3 bedrooms or less provides a suitable balance between meeting local housing need for smaller properties (as evidenced by the Housing Market Assessment), providing certainty to developers and landowners of the Council's expectations, and also providing sufficient flexibility to reflect individual site circumstances.</p> <p>The LTBHM model includes the use of occupation patterns of households in the district and how they are changing, both in terms of tenure and property size. The output of the model therefore provides a robust assessment of the appropriate mix of housing required over the plan period.</p> <p>The requirement for plans to be reviewed in full or in part every 5 years will provide the opportunity to update the 70% requirement, should the latest Housing Market Assessment indicate this to no longer be appropriate.</p> <p>No change proposed.</p>
Evolve Planning & Design for Bloor Homes	AGT24-017-01-09	Policy HC1	<p>Bloor Homes Ltd would wish to raise concerns that the proposed direction of travel appears overly prescriptive with all market housing proposals to include 70% of properties to comprise three bedrooms or less.</p> <p>The SHMA utilises a long-term balancing housing market (LTBHM) model to determine future demand for housing. Bloor Homes Ltd would question whether this model does actually determine demand rather than need. The demand is often for a larger open market property than a household may need to provide additional flexibility e.g. working from home. Therefore, the approach to capping the percentage of larger homes, particularly open market homes, fails to provide a good level of</p>	Yes	No	Yes	<p>The Council considers that the requirement for 70% of market housing to provide 3 bedrooms or less provides a suitable balance between meeting local housing need for smaller properties (as evidenced by the Housing Market Assessment), providing certainty to developers and landowners of the Council's expectations, and also providing sufficient flexibility to reflect individual site circumstances.</p> <p>The LTBHM model includes the use of occupation patterns of households in the district and how</p>

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			flexibility to allow for changing market signals across the plan period or to address varying needs in different locations within the District.				<p>they are changing, both in terms of tenure and property size. The output of the model therefore provides a robust assessment of the appropriate mix of housing required over the plan period.</p> <p>The requirement for plans to be reviewed in full or in part every 5 years will provide the opportunity to update the 70% requirement, should the latest Housing Market Assessment indicate this to no longer be appropriate.</p> <p>No change proposed.</p>
Harris Lamb for Redrow Homes	AGT24-022-03-06	Policy HC1	In principle RH do not object to the policy noting that housing delivery across the District should accommodate the housing need that has been identified. The housing market is not uniform across the whole District and there will be certain parts of the District that would be more appropriate to accommodate specific types and tenures of housing. It would not, therefore, be practical to seek to achieve a district wide housing mix on smaller sites for example where there may be other site-specific constraints that make this unfeasible. Notwithstanding this point there would be opportunities on larger sites such as the land that is proposed at Castlecroft Farm to deliver a wider mix of size of dwellings and tenures including affordable housing.	Yes	No	Not stated	<p>The National Design Guide is clear that well-designed places provide a mixture of property types and sizes to meet varying needs. This is the case for all sizes of development. Site specific circumstances which may preclude a mixture of property sizes being provided on smaller sites are accounted for with the stipulation in the policy of "where consistent with other local plan policies".</p> <p>No change proposed.</p>
Harris Lamb for Redrow Homes	AGT24-022-03-06	Policy HC1	RH, however, object to the requirement in the policy that at least 70% of all dwellings on major development housing sites should include a minimum of 70% of properties with 3 bedrooms or less. RH consider that the objective should be to deliver the requisite housing mix to meet the housing needs across the District rather than to specify the percentage of dwellings on individual sites and specifically seeking to restrict the provision of larger 4 bedroom properties for new development. The policy goes on to state that all development that fails to make efficient use of land by providing a disproportionate amount of large 4 bed homes compared with local housing need would be refused. The reference to disproportionate is unclear and provides no certainty as to how the policy would be applied and how specifically developers would need to respond to it.	Yes	No	Not stated	<p>The Council considers that the requirement for 70% of market housing to provide 3 bedrooms or less provides a suitable balance between meeting local housing need for smaller properties (as evidenced by the Housing Market Assessment), providing certainty to developers and landowners of the Council's expectations, and also providing sufficient flexibility to reflect individual site circumstances.</p> <p>Policy HC1 is clear that mix of developments should be informed by the Housing Market Assessment, which provides a detailed breakdown of the size of properties required in each sub-area of the district. This section of Policy HC1 specifically references a disproportionate amount of 4+ bed homes "compared with local housing need". The Council therefore considers the policy wording provides sufficient clarity on this matter.</p> <p>No change proposed.</p>
Savills UK Ltd for Taylor Wimpey	AGT24-038-05-	Policy HC1	Taylor Wimpey would wish to raise concerns that the proposed direction of travel appears overly prescriptive with all market	Not stated	No	Not stated	<p>The Council considers that the requirement for 70% of market housing to provide 3 bedrooms or</p>



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	03		housing proposals to include 70% of properties to comprise three bedrooms or less.				less provides a suitable balance between meeting local housing need for smaller properties (as evidenced by the Housing Market Assessment), providing certainty to developers and landowners of the Council's expectations, and also providing sufficient flexibility to reflect individual site circumstances.  No change proposed.
Savills UK Ltd for Taylor Wimpey	AGT24-038-05-03	Policy HC1	The SHMA utilises a long-term balancing housing market (LTBHM) model to determine future demand for housing. Taylor Wimpey would question whether this model does actually determine demand rather than need. The demand is often for a larger open market property than a household may need to provide additional flexibility e.g. working from home. Therefore, the approach to capping the percentage of larger homes, particularly open market homes, fails to provide a good level of flexibility to allow for changing market signals across the plan period or to address varying needs in different locations within the District.	Not stated	No	Not stated	The LTBHM model includes the use of occupation patterns of households in the district and how they are changing, both in terms of tenure and property size. The output of the model therefore provides a robust assessment of the appropriate mix of housing required over the plan period.  The requirement for plans to be reviewed in full or in part every 5 years will provide the opportunity to update the 70% requirement, should the latest Housing Market Assessment indicate this to no longer be appropriate.  No change proposed.
Turley Associates for Bellway Homes	AGT24-041-01-02	Policy HC1	Please refer to our previous representations made in December 2022 on this matter at Appendix 1. 2022 Rep – Bellway support the core principle of this policy; however, the prescriptive minimum housing requirements may risk providing the wrong type of housing for Kinver residents.	No	No	No	The Council considers that the policy as drafted provides a suitable balance between meeting local housing need for smaller properties (as evidenced by the Housing Market Assessment), providing certainty to developers and landowners of the Council's expectations, and also providing sufficient flexibility to reflect individual site circumstances and any changes in need over time.  The requirement for plans to be reviewed in full or in part every 5 years will provide the opportunity to update the 70% requirement, should the latest Housing Market Assessment indicate this to no longer be appropriate.  No change proposed.
Turley Associates for Bellway Homes	AGT24-041-01-02	Policy HC1	Please refer to our previous representations made in December 2022 on this matter at Appendix 1. 2022 Rep – Bellway support the core principle of this policy, however the prescriptive minimum housing requirements may risk providing the wrong type of housing for Wombourne residents.	No	No	No	The Council considers that the policy as drafted provides a suitable balance between meeting local housing need for smaller properties (as evidenced by the Housing Market Assessment), providing certainty to developers and landowners of the Council's expectations, and also providing sufficient flexibility to reflect individual site circumstances and any changes in need over

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							time.  The requirement for plans to be reviewed in full or in part every 5 years will provide the opportunity to update the 70% requirement, should the latest Housing Market Assessment indicate this to no longer be appropriate.  No change proposed.
First City Ltd for UKPI Ltd	AGT24-018-02-02	Policy HC1	We support the notion of creating a mixed, sustainable and inclusive community with a mixture of property sizes, types and tenures in order to meet the needs of different groups in the community.	Not stated	Not stated	Not stated	Comments noted.
First City Ltd for UKPI Ltd	AGT24-018-02-02	Policy HC1	<p>Do not agree with the plan being too prescriptive which could potentially hinder the delivery of sites.</p> <p>There is a collective desire for a range of house types, but there is also the desire for sites to have an element of flexibility and individuality on a site by site basis.</p> <p>Housing mix should be guided by market signals as reflected in the most up-to-date assessment of needs. Such assessments will need to be updated over the course of the Plan period. The requirement that 70% of properties comprise of three-bedrooms or less could be considered restrictive and may conflict with the flexibility expected by NPPF Paragraph 63 in order to meet the need to provide for a range of size, type, and tenure for different groups.</p> <p>It is important to note that there remains a need for 4+ bedroom houses within the District as indicated in the supporting evidence within the Strategic Housing Market Assessment 2024 (Table 8.1).</p> <p>The use of the phrase 'disproportionate' in the penultimate paragraph, when describing the quantum of 4+ bedroom houses, lacks a level of clarity and therefore is open to interpretation. The policy should recognise that needs and demand will vary from different areas and different sites.</p>	Not stated	Not stated	Not stated	<p>The Council considers that the requirement for 70% of market housing to provide 3 bedrooms or less provides a suitable balance between meeting local housing need for smaller properties (as evidenced by the Housing Market Assessment), providing certainty to developers and landowners of the Council's expectations, and also providing sufficient flexibility to reflect individual site circumstances.</p> <p>The Housing Market Assessment will be updated on a regular basis to provide an up-to-date picture of local housing need, and Policy HC1 confirms developments should reflect the latest version of this document. This ensures the policy remains sound over time.</p> <p>The requirement for plans to be reviewed in full or in part every 5 years will provide the opportunity to update the 70% requirement, should the latest Housing Market Assessment indicate this to no longer be appropriate.</p> <p>Policy HC1 is clear that mix of developments should be informed by the Housing Market Assessment, which provides a detailed breakdown of the size of properties required in each sub-area of the district. This section of Policy HC1 specifically references a disproportionate amount of 4+ bed homes "compared with local housing need". The Council therefore considers the policy wording provides sufficient clarity on this matter.</p> <p>No change proposed.</p>

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Marrons Planning for L&Q Estates	AGT24-027-03-04	Policy HC1	Draft Policy HC1 lacks flexibility in seeking to require a minimum of 70% of residential dwellings on new development to be 3 bedrooms or less. Draft Policy HC1 should be amended to remove reference to a minimum 70% requirement for dwellings of 3 bedrooms and less and should include scenarios where a mix which varies from that desired is considered acceptable.	Yes	No	Yes	The Council considers that the requirement for 70% of market housing to provide 3 bedrooms or less provides a suitable balance between meeting local housing need for smaller properties (as evidenced by the Housing Market Assessment), providing certainty to developers and landowners of the Council's expectations, and also providing sufficient flexibility to reflect individual site circumstances.  No change proposed.
Marrons Planning for Boningale Homes	AGT24-027-02-01	Policy HC1	It is important to note that housing mix as identified in the Council's latest evidence base will only provide a snapshot in time in relation to the current housing needs. As such, the policy should provide for flexibility going forward so that the Plan is able to respond to changes in circumstances at the time of an application being submitted to the Local Planning authority so that development opportunities can make better use of the land available whilst responding to the housing needs at that time.	Not stated	No	Not stated	The Council considers that the policy as drafted provides a suitable balance between meeting local housing need for smaller properties (as evidenced by the Housing Market Assessment), providing certainty to developers and landowners of the Council's expectations, and also providing sufficient flexibility to reflect individual site circumstances and any changes in need over time.  No change proposed.
Pegasus Group for Richborough Estates	AGT24-030-05-02	Policy HC1	HC1 is overly prescriptive in relation to housing mix and pre-empted housing need through the Plan period rather than simply referring to the SHMA. The SHMA shows a clear need for 4-bedroom market and affordable family homes. HC1 should delete specific reference to the delivery of 2 and 3-bedroom homes (proposed text in paragraph 6.2 of full representation). Requiring 70% of properties to be 3-bedroom or less on major developments does not afford sufficient flexibility in order to meet the need to provide for a range of size, type and tenure of different groups. Housing mix should be guided by market signals as reflected in the most up-to-date assessment needs.	Yes	No	Yes	The Council considers that the requirement for 70% of market housing to provide 3 bedrooms or less provides a suitable balance between meeting local housing need for smaller properties (as evidenced by the Housing Market Assessment), providing certainty to developers and landowners of the Council's expectations, and also providing sufficient flexibility to reflect individual site circumstances.  The Housing Market Assessment will be updated on a regular basis to provide an up-to-date picture of local housing need, and Policy HC1 confirms developments should reflect the latest version of this document. This ensures the policy remains sound over time.  The requirement for plans to be reviewed in full or in part every 5 years will provide the opportunity to update the 70% requirement, should the latest Housing Market Assessment indicate this to no longer be appropriate.  No change proposed.
Pegasus Group for Richborough	AGT24-030-05-	Policy HC1	The Plan acknowledges an increased need to accommodate home working. HC1 as currently drafted will restrict the ability to	Yes	No	Yes	The LTBHM model includes the use of occupation patterns of households in the district and how

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Estates	02		meet these needs across the Plan period. The policy should recognise that needs and demand will vary from area to area, including individual settlements. Mix can also influence the viability of development and the policy should recognise this. The policy is considered unsound.				<p>they are changing, both in terms of tenure and property size. A breakdown of housing need by sub-area of the district is also provided, which the Council considers is a suitable level of detail required to inform mix on new developments across the district. The output of the model therefore provides a robust assessment of the appropriate mix of housing required over the plan period.</p> <p>The draft policy wording provides a balance between clarity of Council expectations and flexibility to reflect site circumstances, which includes development viability. This policy has been tested on a range of site typologies alongside all other local plan policies and has been demonstrated to be viable. The Council does not consider it to pose any risk to site deliverability on viability grounds.</p> <p>No change proposed.</p>
Pegasus Group for Clowes Developments	AGT24-031-02-01	Policy HC1	HC1 is overly prescriptive in relation to housing mix and pre-empts housing need through the Plan period rather than simply referring to the SHMA. The SHMA shows a clear need for 4-bedroom market and affordable family homes. HC1 should delete specific reference to the delivery of 2 and 3-bedroom homes (proposed text in paragraph 6.2 of full representation). Requiring 70% of properties to be 3-bedroom or less on major developments does not afford sufficient flexibility in order to meet the need to provide for a range of size, type and tenure of different groups.	Not stated	No	No	<p>The Council considers that the requirement for 70% of market housing to provide 3 bedrooms or less provides a suitable balance between meeting local housing need for smaller properties (as evidenced by the Housing Market Assessment), providing certainty to developers and landowners of the Council's expectations, and also providing sufficient flexibility to reflect individual site circumstances.</p> <p>The Housing Market Assessment will be updated on a regular basis to provide an up-to-date picture of local housing need, and Policy HC1 confirms developments should reflect the latest version of this document. This ensures the policy remains sound over time.</p> <p>The requirement for plans to be reviewed in full or in part every 5 years will provide the opportunity to update the 70% requirement, should the latest Housing Market Assessment indicate this to no longer be appropriate.</p> <p>No change proposed.</p>
Pegasus Group for Clowes Developments	AGT24-031-02-02	Policy HC1	The use of the phrase 'disproportionate' when describing the quantum of 4+ bedroom houses lacks the precision and clarity needed for Plan policy. It does not provide sufficient flexibility. Housing mix should be guided by market signals as reflected in	Not stated	No	No	<p>Policy HC1 is clear that mix of developments should be informed by the Housing Market Assessment, which provides a detailed breakdown of the size of properties required in</p>

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			<p>the most up-to-date assessment needs.</p> <p>The Plan acknowledges an increased need to accommodate home working. HC1 as currently drafted will restrict the ability to meet these needs across the Plan period. The policy should recognise that needs and demand will vary from area to area, including individual settlements. Mix can also influence the viability of development and the policy should recognise this. The policy is considered unsound.</p>				<p>each sub-area of the district. This section of Policy HC1 specifically references a disproportionate amount of 4+ bed homes "compared with local housing need". The Council therefore considers the policy wording provides sufficient clarity on this matter.</p> <p>The LTBHM model includes the use of occupation patterns of households in the district and how they are changing, both in terms of tenure and property size. A breakdown of housing need by sub-area of the district is also provided, which the Council considers is a suitable level of detail required to inform mix on new developments across the district. The output of the model therefore provides a robust assessment of the appropriate mix of housing required over the plan period.</p> <p>The draft policy wording provides a balance between clarity of Council expectations and flexibility to reflect site circumstances, which includes development viability. This policy has been tested on a range of site typologies alongside all other local plan policies and has been demonstrated to be viable. The Council does not consider it to pose any risk to site deliverability on viability grounds.</p> <p>No change proposed.</p>
Pegasus Group for Miller Homes	AGT24-031-03-03	Policy HC1	We do not consider that the lack of flexibility in this policy is justified. The most suitable and appropriate manner to assess housing mix is by determination of the market at the time of submission of a planning application, rather than at adoption of the Local Plan.	Not stated	No	No	<p>The Council considers that the policy as drafted provides a suitable balance between meeting local housing need for smaller properties (as evidenced by the Housing Market Assessment), providing certainty to developers and landowners of the Council's expectations, and also providing sufficient flexibility to reflect individual site circumstances and any changes in need over time.</p> <p>No change proposed.</p>
Pegasus Group for Persimmon Homes	AGT24-032-04-01	Policy HC1	<p>HC1 is overly prescriptive and pre-empts housing need rather than referring to the SHMA.</p> <p>Whilst the housing stock across the district includes a large proportion of larger homes, these are not available to meet the needs of families in need of a home. HC1 needs to delete specific reference to the delivery of 2 and 3-bedroom homes. The requirement that 70% of properties comprise 3-bedrooms or less is restrictive and does not afford sufficient flexibility. The</p>	Not stated	No	Not stated	<p>The Council considers that the requirement for 70% of market housing to provide 3 bedrooms or less provides a suitable balance between meeting local housing need for smaller properties (as evidenced by the Housing Market Assessment), providing certainty to developers and landowners of the Council's expectations, and also providing sufficient flexibility to reflect individual site</p>



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			use of the phrase 'disproportionate' lacks the precision and clarity needed for a Plan policy. The policy should recognise that needs and demand in regards to home working will vary from area to area, including individual settlements. The policy is considered unsound as it is inconsistent with national policy.				<p>circumstances.</p> <p>The Housing Market Assessment will be updated on a regular basis to provide an up-to-date picture of local housing need, and Policy HC1 confirms developments should reflect the latest version of this document. This ensures the policy remains sound over time.</p> <p>Policy HC1 is clear that mix of developments should be informed by the Housing Market Assessment, which provides a detailed breakdown of the size of properties required in each sub-area of the district. This section of Policy HC1 specifically references a disproportionate amount of 4+ bed homes "compared with local housing need". The Council therefore considers the policy wording provides sufficient clarity on this matter.</p> <p>No change proposed.</p>
Pegasus Group for Taylor Wimpey	AGT24-032-08-02	Policy HC1	The requirement that 70% of properties comprise 3-bedrooms or less is restrictive and does not afford the flexibility expected by NPPF paragraph 63. The use of the phrase 'disproportionate' lacks the precision and clarity needed for a Plan policy. The policy should recognise that needs and demand will vary from area to area, including individual settlements. Clarification should also be made in defining 'major' development. Taylor Wimpey suggest a definition of major development should be reintroduced to the Plan, with the DMPO definition referred to for the avoidance of doubt. The policy is considered unsound.	Not stated	No	Not stated	<p>The Council considers that the requirement for 70% of market housing to provide 3 bedrooms or less provides a suitable balance between meeting local housing need for smaller properties (as evidenced by the Housing Market Assessment), providing certainty to developers and landowners of the Council's expectations, and also providing sufficient flexibility to reflect individual site circumstances.</p> <p>Policy HC1 is clear that mix of developments should be informed by the Housing Market Assessment, which provides a detailed breakdown of the size of properties required in each sub-area of the district. This section of Policy HC1 specifically references a disproportionate amount of 4+ bed homes "compared with local housing need". The Council therefore considers the policy wording provides sufficient clarity on this matter.</p> <p>A definition of major development is provided in the glossary.</p> <p>No change proposed.</p>
PlanIT Planning & Development for Miller Homes	AGT24-034-04-06	Policy HC1	The plan has been prepared to have a 15-year time horizon. The demand for property types could change over time. As such, HC1 is overly prescriptive and will restrict the number of larger	Yes	No	Yes	Policy HC1 is clear that mix of developments should be informed by the Housing Market Assessment, which provides a detailed

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			properties with no recognition that the demand for such properties could be very different over the plan period. South Staffordshire has a large plan area. The demand for different property types will be different across the plan area – e.g. housing sites allocated adjacent to the edge of the urban area to meet the growth requirements of Birmingham and the Black Country should meet their housing mix requirements, not South Staffordshire. We object to the suggestion that s106 agreements will be used to secure the mix of outline planning applications, this matter can be addressed by a condition. Conditions should only be applied where there is evidence that this approach is necessary and should be determined on a site-by-site basis.				breakdown of the size of properties required in each sub-area of the district.  The requirement for plans to be reviewed in full or in part every 5 years will provide the opportunity to update the policy, should the latest Housing Market Assessment indicate this to no longer be appropriate.  Housing mix will be secured at outline stage either via condition or S106 agreement. This approach ensures developers and landowners are made aware of the Council's expectations at an early stage and can be taken into consideration for land transactions. The Council views this an appropriate approach to ensure sites meet local housing need and to safeguard the deliverability of sites.  No change proposed.
Brewood Civic Society	STA24-008-06	Policy HC1	Brewood Civic Society supports Policy HC1: Housing Mix Like many villages, we have a shortage of smaller houses and houses suitable for an ageing population	Not stated	Not stated	Not stated	Comments noted.
<b>POLICY HC2: Housing Density</b>							
Kinver Parish Council	STA24-025-05	Policy HC2	As a tier 2 settlement housing should fit the local semi-rural character. The AECOM design codes developed for the Kinver Neighbourhood Plan make clear that typical housing density locally to the site is at most 20 dwellings/ha, and lower towards the village fringes. Policy HC2 should make reference to the design policies in the Kinver Neighbourhood Plan which refer to degree of set back, pattern of place and other characteristics that are reflective of typical housing density design in the area.	Not stated	Not stated	Not stated	Policy does allow for a measure of flexibility in relation to densities where it can be demonstrated that this would result in adverse impacts. The design code produced as part of the neighbourhood plan will be a material consideration however this will need to be considered alongside the national and local plan policy requirements which seek to promote the efficient use of land.  No change proposed.
Avison Young for Crest Nicholson	AGT24-004-02-03	Policy HC2	It is unclear whether the requirement for a minimum density of 35dph applies to allocated sites adjoining non-Tier 1 settlements. this is unlikely to be appropriate and the policy should be amended to allow greater flexibility The draft Policy appears to set a single minimum density for the majority of housing developments planned to come forward across the District. Having regard to NPPF para 128 this is unlikely to be appropriate and the policy should be amended to allow greater flexibility to reflect a range of other factors including market, viability, accessibility and character.	Yes	No	Not stated	In locations outside Tier one locations and central areas of Tier 1-3 settlements the policy is proposing to adopt a flexible approach with each application being determined on a case-by-case basis referencing factors such as proximity to services, local character and housing mix requirements.  It is view of the district council that seeking to establish a minimum density for those locations which are considered to be relatively well served and accessible is in accordance with national policy requirements particularly with respect to

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							the objective of optimising the use of land. The policy does contain caveats which aim to ensure that delivering the efficient use of land would not result in the creation of adverse impacts.  No change proposed.
Acres Land and Planning for Hallam Land Management	AGT24-001-01-01	Policy HC2	We are concerned that in a rural District such as South Staffordshire, the requirement for a minimum net density of 35 dwellings per hectare is completely unrealistic and will create high density designs. This policy should be reviewed with a simple 'common-sense check' to decide whether the Council are creating better living conditions or are in danger of creating poorer housing conditions for the future. If the Council wish to provide more housing, the solution may be to release more land where and when it is needed and ensure there is enough space to build the homes that are needed without creating cramped high-density housing which will be unpopular with the public.	Not stated	No	Not stated	It is view of the district council that seeking to establish a minimum density for those locations which are considered to be relatively well served and accessible is in accordance with national policy requirements particularly with respect to the objective of optimising the use of land. The policy does contain caveats which aim to ensure that delivering the efficient use of land would not result in the creation of adverse impacts.  No change proposed.
RCA Regeneration for Barberry Developments	AGT24-035-01-02	Policy HC2	Agree with Policy HC2, that development should seek to make efficient use of land by achieving a least the minimum density of 35 dwellings per ha, and in many cases should exceed this minimum density, to encourage the delivery of more housing across South Staffordshire. However, this should not be at odds with prevailing character, nor the need to accommodate 10% BNG for instance.	No	No	No	Support noted. The policy to contain caveats which aim to ensure that delivering the efficient use of land would not result in the creation of adverse impacts.  No change proposed.
RCA Regeneration for Seven Capital	AGT24-035-03-02	Policy HC2	Agree with Policy HC2, that development should seek to make efficient use of land by achieving a least the minimum density of 35 dwellings per ha, and in many cases should exceed this minimum density, to encourage the delivery of more housing across South Staffordshire. However, this should not be at odds with prevailing character, nor the need to accommodate 10% BNG for instance.	Not stated	No	No	Support noted. The policy to contain caveats which aim to ensure that delivering the efficient use of land would not result in the creation of adverse impacts.  No change proposed.
RCA Regeneration for Richborough Estates	AGT24-035-02-02	Policy HC2	Agree with Policy HC2, that development should seek to make efficient use of land by achieving a least the minimum density of 35 dwellings per ha, and in many cases should exceed this minimum density, to encourage the delivery of more housing across South Staffordshire. However, this should not be at odds with prevailing character, nor the need to accommodate 10% BNG for instance.	Not stated	No	No	Support noted. The policy to contain caveats which aim to ensure that delivering the efficient use of land would not result in the creation of adverse impacts.  No change proposed.
Evolve Planning & Design for Lovell Homes	AGT24-017-05-01	Policy HC2	Lovell Homes supports the efficient use of land and supports the flexibility provided by HC2 to allow sites to be considered on a site-by-site basis, having regard to the prevailing local character, context and other planning policy requirements or opportunities for supporting infrastructure.	Not stated	Not stated	Not stated	Support noted.  No change proposed.
Evolve Planning & Design for Keon Homes	AGT24-017-04-01	Policy HC2	Keon Homes supports the efficient use of land and supports the flexibility provided by HC2 to allow sites to be considered on a site-by-site basis, having regard to the prevailing local character, context and other planning policy requirements or	Not stated	Not stated	Not stated	Support noted.  No change proposed.

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			opportunities for supporting infrastructure.				
Evolve Planning & Design for Four Ashes Road Ltd	AGT24-017-03-01	Policy HC2	Four Ashes Road Ltd supports the efficient use of land and supports the flexibility provided by HC2 to allow sites to be considered on a site-by-site basis, having regard to the prevailing local character, context and other planning policy requirements or opportunities for supporting infrastructure.	Not stated	Not stated	Not stated	Support noted. No change proposed.
Evolve Planning & Design for Cameron Homes	AGT24-017-02-01	Policy HC2	Cameron Homes supports the efficient use of land and supports the flexibility provided by HC2 to allow sites to be considered on a site-by-site basis, having regard to the prevailing local character, context and other planning policy requirements or opportunities for supporting infrastructure.	Not stated	Not stated	Not stated	Support noted. No change proposed.
Evolve Planning & Design for Bloor Homes	AGT24-017-01-09	Policy HC2	Land East of Bilbrook - Bloor Homes supports the efficient use of land and supports the flexibility provided by HC2 to allow sites to be considered on a site-by-site basis, having regard to the prevailing local character, context and other planning policy requirements or opportunities for supporting infrastructure.	Not stated	Not stated	Not stated	Support noted. No change proposed.
Harris Lamb for Redrow Homes	AGT24-022-03-07	Policy HC2	RH welcome the objective of achieving a minimum net density of 35 dwellings per hectare on sites adjoining Tier 1 settlements and infill locations within built up areas of Tier 1 to 3 settlements across the District.  RH note the wording of the policy that seeks to encourage, rather than impose, strict adherence to the density requirements set out. RH supports this flexible approach to consideration of density noting that there may be instances where the character and site specific circumstances of a proposed development site dictate that there should be divergence away from the minimum density set out above. We consider this policy sound.	Yes	Yes	Not stated	Support noted. No change proposed.
Pegasus Group for Richborough Estates	AGT24-030-05-02	Policy HC2	Achieving 35dph across large sites could prove difficult and conflict with other policy provisions across the Plan, particularly having regard to the District's rural character.  Reliance on the delivery of housing developments at a higher density delivery does not provide a reliable strategy for the delivery of the District's housing requirement across the Plan period and therefore a greater number of housing sites will be necessary to achieve the required housing numbers.	Yes	No	Yes	It is view of the district council that seeking to establish a minimum density for those locations which are considered to be relatively well served and accessible is in accordance with national policy requirements particularly with respect to the objective of optimising the use of land. The policy does contain caveats which aim to ensure that delivering the efficient use of land would not result in the creation of adverse impacts.  The policy notes that the density levels across larger sites may vary though believes that this can be done whilst still meeting the overall minimum site density requirement as set out in the policy.  No change proposed.
Turley Associates for Bellway Homes	AGT24-041-01-	Policy HC2	Hyde Lane and Dunsley Drive are unconstrained and would be capable of achieving higher densities than that required by the	No	No	No	The policy suggest that the density figure is a minimum subject to the need to take account of

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	02		policy.				potential adverse impacts. Sites in locations not required to meet the minimum density requirement will be addressed on a site-by-site basis through the development management process.  No change proposed.
Turley Associates for Bellway Homes	AGT24-041-01-02	Policy HC2	The planning application for Orton Lane comprises a proposal for 32 dwellings and was informed by pre-application discussions. The density doesn't meet the 35 DPH but is considered appropriate for the site.	No	No	No	Comment noted, the application is being determined in relation to the existing policy framework.  No change proposed.
First City Ltd for UKPI Ltd	AGT24-018-02-03	Policy HC2	We do not object to a minimum density being applied to sites. However, again we do not consider policy should be too prescriptive as there needs to be a level of flexibility from area to area and site to site. A compulsory density would not be suitable for all sites. The density of development within a scheme may vary to take account of local character impacts, site specific characteristics and the provision of services and facilities across a development and should not impact or conflict with other policy provisions that apply to particular sites.	Not stated	Not stated	Not stated	It is view of the district council that seeking to establish a minimum density for those locations which are considered to be relatively well served and accessible is in accordance with national policy requirements particularly with respect to the objective of optimising the use of land. The policy does contain caveats which aim to ensure that delivering the efficient use of land would not result in the creation of adverse impacts.  No change proposed.
Marrons Planning for L&Q Estates	AGT24-027-03-01	Policy HC2	Draft Policy HC2 is unduly onerous in requiring residential development to achieve a minimum of 35 dwellings per net developable hectare, without sufficient flexibility. Draft Policy HC2 should be amended to set out that the net density of 35 dwellings per net developable hectare is a target which should be assessed on a site-by-site basis taking account of on-site and off-site constraints, impact on the related settlement character and the influence of any other SSLPR policy measures which reduce achievable net density.	Yes	No	Yes	It is view of the district council that seeking to establish a minimum density for those locations which are considered to be relatively well served and accessible is in accordance with national policy requirements particularly with respect to the objective of optimising the use of land. The policy does contain caveats which aim to ensure that delivering the efficient use of land would not result in the creation of adverse impacts.  No change proposed.
CPRE West Midlands Regional Group	STA24-014-07	Policy HC2	Density policy has been weakened compared to the 2022 Plan. The 2024 Plan omits reference to rural exception sites and the aim to exceed densities refers only to 'central areas'. Whilst policy specifically expects sites to seek to make efficient use of land this is no longer identified as a reason for refusal. The council should revert to the 2022 policy. We consider that a minimum density of 40-45 dph may be appropriate in some locations and this should be defined in policy.	Not stated	Not stated	Not stated	The density target is established as a minimum therefore there will be the potential for higher levels to be achieved, however the policy is mindful that higher densities should not result in adverse impacts. The policy approach is attempting to achieve a balance of promoting the optimisation of land use whilst respecting the existing character of the settlements within the district. The council believes that the approach adopted by the policy will act to achieve this balance.  No change proposed.



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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
Pegasus Group for Richborough Estates	AGT24-030-05-02	Policy HC2	Richborough welcome text which recognises that a blanket approach to density is unlikely to be effective. Reliance on the delivery of housing developments at a higher density does not provide a reliable strategy for the housing requirement and therefore a greater number of housing sites will be necessary to achieve the required housing numbers. The numerous policy requirements places increased pressure on sites and the ability to achieve higher densities. The allocation of additional housing sites would allow for the delivery of much needed homes balanced alongside the need to delivery high quality residential environments.	Yes	No	Yes	The density target is established as a minimum therefore there will be the potential for higher levels to be achieved, however the policy is mindful that higher densities should not result in adverse impacts. The policy approach is attempting to achieve a balance of promoting the optimisation of land use whilst respecting the existing character of the settlements within the district. The council believes that the approach adopted by the policy will act to achieve this balance.  No change proposed.
CPRE Staffordshire	STA24-013-07	Policy HC2	Density on allocated sites is lower than the requirement set out in Policy HC2. Average Densities on the larger allocated sites are generally between 20 and 25 dwellings. This will necessitate the loss of more green belt and greenfield land.	Not stated	No	Not stated	The density target is established as a minimum therefore there will be the potential for higher levels to be achieved, however the policy is mindful that higher densities should not result in adverse impacts. The policy approach is attempting to achieve a balance of promoting the optimisation of land use whilst respecting the existing character of the settlements within the district. The council believes that the approach adopted by the policy will act to achieve this balance.  No change proposed.
Berrys for Bradford Estates	AGT24-006-01-02	Policy HC2	LATE SUBMISSION HC2 omits infilling from tier 4 and 5, this is inconsistent with the rural maintain and enhance principles contained within the National Planning Policy Framework.	Yes	No	yes	Tiers 4 and 5 are small settlements often with few or no supporting services and facilities. The plan strategy envisages that such settlement would be the subject of very limited if any additional developments. The approach in such areas is addressed by the policy where it is stated that in areas not covered by the minimum density policy a case-by-case approach will be adopted.  No change proposed.
Pegasus Group for Clowes Developments Ltd	AGT24-030-02-02	Policy HC2	Clowes welcome text which recognises that a blanket approach to density is unlikely to be effective. Reliance on the delivery of housing developments at a higher density does not provide a reliable strategy for the housing requirement and therefore a greater number of housing sites will be necessary to achieve the required housing numbers. The numerous policy requirements places increased pressure on sites and the ability to achieve higher densities. The allocation of additional housing sites would allow for the delivery of much needed homes balanced alongside the need to delivery high quality residential environments.	Not stated	No	No	The density target is established as a minimum therefore there will be the potential for higher levels to be achieved, however the policy is mindful that higher densities should not result in adverse impacts. The policy approach is attempting to achieve a balance of promoting the optimisation of land use whilst respecting the existing character of the settlements within the district. The council believes that the approach adopted by the policy will act to achieve this balance.

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							No change proposed.
Pegasus Group for Persimmon Homes	AGT24-030-04-01	Policy HC2	The flexibility afforded to housing density and the recognition that although a minimum of 35dph across the wider site should be delivered, the density of development within a scheme may vary to take account of local character impacts and the provision of services and facilities across a development, is welcomed.	Not stated	No	Not stated	Support noted. No change proposed.
Pegasus Group for Taylor Wimpey	AGT24-030-08-02	Policy HC2	The flexibility afforded to housing density and the recognition that although a minimum of 35dph across the wider site should be delivered, the density of development within a scheme may vary to take account of local character impacts and the provision of services and facilities across a development, is welcomed.	Not stated	No	Not stated	Support noted. No change proposed.
<b>POLICY HC3: Affordable Housing</b>							
Claremont Planning Consultancy for Noakes, J	AGT24-012-01-07	Policy HC3	In order to secure the delivery of more discounted ownership tenure properties, it will be necessary to boost market housing delivery. It is likely that the authority will be expected to assist in meeting cross-boundary needs for affordable housing. Wolverhampton City Council (WCC) representations to the previous plan consultation identified a requirement of 50% of proposed affordable housing on sites on the edge of the urban area to be provided specifically to meet affordable housing needs arising from Wolverhampton. Failing to appropriately plan for cross boundary needs will restrict the level of affordable housing to be delivered overall reducing the ability to meet neighbouring authorities affordable housing needs.	Yes	No	No	Chapter 5 of the 2024 Housing Market Assessment update sets out how the type and tenure of future housing need has been calculated. This includes the district's local housing need and the 640-home contribution to wider unmet need. The mix of housing for both elements of the Council's housing requirement have therefore been suitably modelled, and this includes the provision of affordable housing.  No change proposed.
Wombourne Parish Council	STA24-052-01	Policy HC3	Seek means by which affordable housing is offered to local people first.	Not stated	Yes	Not stated	Restricting occupation of affordable housing to local people with links to the village/parish in which the development is located is only permissible on rural exception sites. Affordable housing delivered through the Local Plan meets a strategic need across the district (and as part of the contribution to wider unmet needs) to provide homes for those unable to access market housing. Applying tight local connection criteria is therefore not appropriate on-site allocations.

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							No change proposed.
Walsall Council	STA24-049-01	Policy HC3	The term "major housing development" should be defined to ensure that the policy is sound. We recommend that it should refer to developments of 10 or more homes in accordance with the definition of major development in the GDPO.	Not stated	Not stated	Not stated	Major development is defined in the glossary.  No change proposed.
Cheslyn Hay Parish Council	STA24-011-01	Policy HC3	If any sites are approved Cheslyn Hay Parish Council would encourage and welcome affordable housing in the Village	Not stated	No	Not stated	Comments noted.
Goldfinch Town Planning Services	AGT24-020-01-01	Policy HC3	Paragraph 7.7 (page 77) of the Publication Stage Report (April 2024) - Affordable Housing 29% proposed planning policy threshold: The 29% affordable housing planning policy threshold being proposed within the emerging Publication Stage Report (2024) is highly onerous, totally unreasonable, no longer justified, and no longer sustainable, and will have a highly damaging financial impact on the future viability and deliverability of new housing development schemes coming forward across the South Staffordshire District. within the emerging Local Plan Review, proposed affordable housing planning policy thresholds should therefore be significantly reduced downwards to 5% to reflect guidance reinforced within paragraphs 16 (indentb: plans should be aspirational but also deliverable), 31 (policies should be based upon the most up-to-date and robust evidence), 35 (indents b: Local Plans should be based on proportionate evidence – indent c: contain deliverable policies) and 86 (indent d: policies should remain flexible to enable a rapid response to changes in economic circumstances) of the Revised NPPF (December 2023).	No	No	No	The Housing Market Assessment indicates a need for 29% of housing provided through the plan to be affordable homes. In addition, the Viability Study has demonstrated a requirement for 30% affordable housing to be viable, alongside the wide range of other policy requirements. A 30% policy requirement is therefore considered to be appropriate and justified.  No change proposed.
West Midlands Housing Association Planning Consortium (Tetlow King)	STA24-050-02	Policy HC3	The tenure mix proposed by Policy HC3 'Affordable Housing' (25% First Homes, 50% Social Rent, 25% Shared Ownership) completely disregards the affordable rented tenure. The proposed tenure split therefore does not account for all affordable needs as those who qualify for affordable rent may not qualify for social rent. It would be beneficial if there was flexibility in the policy wording to allow for affordable housing needs to be met across the full spectrum of tenures, as set out by Annex 2 of the NPPF. It is recommended that further policy text be added to indicate that the tenure split set out in Policy HC3 is indicative and that tenure split can be justified on a site-by-site basis with appropriate evidence.	Not stated	Not stated	Not stated	The Council has set out a clear justification for the provision of social rent rather than affordable rent in the Affordable Housing and Housing Mix topic paper. The primary concern is the genuine affordability of affordable rent in the district.  It is important to be clear on the Council's expectations for tenure split, as set out in the draft policy, as this will impact on viability and therefore site deliverability.  No change proposed.
West Midlands Housing Association Planning Consortium (Tetlow King)	STA24-050-02	Policy HC3	Appreciates the intention to require new development to fully integrate and be materially indistinguishable from the market housing as well as suitably pepper pot the affordable housing across the site. However, this approach is not the most suitable for many housing associations and registered providers as it makes management more difficult as the properties are more spread out. The WMHAPC would not encourage affordable	Not stated	Not stated	Not stated	Comments noted. Further guidance on the integration of affordable housing including appropriate cluster size will be provided in the Affordable Housing SPD.  No change proposed.

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			housing to be grouped together in one area, instead, recommending that affordable housing is clustered across a site, with policy expressing a maximum group size or range; approximately 10-15 dwellings forming each cluster on larger sites (circa 100+ dwellings) is often favoured.				
West Midlands Housing Association Planning Consortium (Tetlow King)	STA24-050-02	Policy HC3	<p>Paragraph 7 of Policy HC3 asserts that all affordable housing will be secured in perpetuity. The sole reference in the NPPF to retaining affordable housing in perpetuity is in Annex 2 where this is sought for affordable housing delivered on Rural Exception Sites.</p> <p>“Rural exception sites: small sites used for affordable housing in perpetuity where sites would not normally be used for housing. . . A proportion of market homes may be allowed on the site at the local planning authority’s discretion, for example where essential to enable the delivery of affordable units without grant funding.”</p> <p>This principle is appropriate and supported by our members as this helps to secure land for delivery of affordable housing in rural areas where housing delivery would otherwise not be supported. Securing affordable housing in perpetuity more widely is not supported as it restricts lenders’ appetite to fund development, private companies will not typically invest in developments if there is no prospect of realising the original investment and any returns. We therefore request that all references to securing affordable housing in perpetuity are removed from the draft Local Plan unless they are made specifically in relation to Rural Exception Sites.</p>	Not stated	Not stated	Not stated	<p>The Council considers it important to secure affordable housing in perpetuity in order to safeguard new stock in the longer term. It also ensures mixed and balanced communities are maintained in the future.</p> <p>The Council’s standard S106 template makes use of relevant Mortgagee Exclusion Clauses to ensure the ability of Registered Providers to borrow against their assets is not compromised.</p> <p>No change proposed.</p>
West Midlands Housing Association Planning Consortium (Tetlow King)	STA24-050-02	Policy HC3	The draft Local Plan does not set out an affordable housing needs figure or requirement. While the Council’s evidence base includes the 2022 Strategic Housing Market Assessment Update (SHMA), it is nevertheless good practice to include an affordable housing target in the Plan itself to allow for effective monitoring of affordable housing delivery.	Not stated	Not stated	Not stated	<p>Comments noted. Paragraph 7.7 sets out what percentage of housing delivered through the plan should be affordable. The Council will add further detail to this paragraph to clarify what this means in numerical terms.</p> <p><b>Proposed change</b></p> <p><b>See Minor Modification 012</b></p> <p><b>Taking into account both South Staffordshire’s need and the contribution to meeting unmet needs in the wider Housing Market Area, the Housing Market Assessment 2024 recommends approximately 29% of new housing delivered up to 2041 should be provided as affordable housing. This equates to a minimum of 1,371 affordable homes over the plan period. Just over half of this need is for rented homes, with the remainder split almost equally between First Homes and shared ownership.</b></p>

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West Midlands Housing Association Planning Consortium (Tetlow King)	STA24-050-02	Policy HC3	Paragraph 8 of Policy HC3 states that "shared ownership housing will be subject to staircasing restrictions in Designated Protected Areas in accordance with the relevant legislation, in order to safeguard new provision." Where shared ownership properties are to be provided as intermediate housing on sites in DPAs - staircasing restrictions impact consumer appetites for the product and has a financial impact on housing associations as they have to be prepared to buy back the property. Shared ownership properties are expected to play a significant role in providing the affordable homes required in South Staffordshire. As DPAs are found across the South Staffordshire area, we ask as a minimum that Policy HC3 recognises that there will be occasions where special circumstances apply that warrant the removal of the staircasing restriction provided that this request is justified with evidence. It is accepted that this will be done on a case-by-case basis as the evidence often relates to the site's specific circumstances.	Not stated	Not stated	Not stated	The Council has an internal process in place to deal with requests for removal of DPA restrictions. It is not considered necessary to set this out in the policy. Further guidance will instead be provided in the Affordable Housing SPD.  No change proposed.
First City for St Mary's Presbytery and The Archdiocese of Birmingham	AGT24-018-01-05	Policy HC3	The use of the term 'major residential development' in this context requires a definition to save confusion as to what size of development affordable housing becomes a requirement, it is presumed to be the same as that within the NPPF Glossary.  It is important for policy set out in the Local Plan and any forthcoming SPDs shows a level of flexibility as the viability of a site needs to be assessed at the time of the application in addition to at the time of the adoption of the Local Plan to ensure developments can continue despite factors which could impact viability.	Not stated	No	Not stated	Major development is defined in the glossary.  The PPG is clear that where up-to-date policies have set out the contributions expected from development, planning applications that fully comply with them should be assumed to be viable. Viability should be considered at plan-making stage and should only be revisited at application stage should the applicant clearly demonstrate particular circumstances to justify it.  No change proposed.
Avison Young for Crest Nicholson	AGT24-004-02-03	Policy HC3	Whilst it is anticipated that 30% affordable housing would be viable at Crest's site in Kinver, a 'blanket' requirement for 30% would not appear to be justified having regard to the Council's own evidence, nor be consistent with the NPPF.	Yes	No	Not stated	The Housing Market Assessment indicates a need for 29% of housing provided through the plan to be affordable homes. In addition, the Viability Study has demonstrated a requirement for 30% affordable housing to be viable, alongside the wide range of other policy requirements. A 30% policy requirement is therefore considered to be appropriate and justified. Further information on this is provided in Section 8 of the Affordable Housing topic paper.  No change proposed.
Acres Land and Planning for Hallam Land Management	AGT24-001-01-01	Policy HC3	We broadly accept the requirement for 30% affordable housing as a general target, although this cannot be a fixed figure since sites will need to be considered against wider viability criteria. Each site needs to be judged on its own merits and individual circumstances.	Not stated	No	Not stated	The PPG is clear that where up-to-date policies have set out the contributions expected from development, planning applications that fully comply with them should be assumed to be viable. Viability should be considered at plan-making stage and should only be revisited at



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							application stage should the applicant clearly demonstrate particular circumstances to justify it.  No change proposed.
NHS Property Services	STA24-034-01	Policy HC3	<p>We suggest the Council consider the need for affordable housing for NHS staff and those employed by other health and care providers in the local authority area. The sustainability of the NHS is largely dependent on the recruitment and retention of its workforce. Most NHS staff need to be anchored at a specific workplace to carry out their role and when staff cannot afford or rent or purchase suitable accommodation within reasonable proximity to their workplace, it has an impact on the ability of the NHS to recruit and retain staff.</p> <p>As the population grows in areas of new housing development, additional health services are required, meaning the NHS must grow its workforce to adequately serve the population. Ensuring NHS staff have access to suitable housing at an affordable price is an important factor in supporting the delivery of high-quality local healthcare services.</p> <p>We recommend that the Council – Engage with local NHS partners such as the local ICB, NHS Trusts and other relevant ICS partners Ensure the local need for affordable housing for NHS staff is factored into housing needs assessments Consider site selection in relation to identified needs for affordable housing for NHS staff</p>	Not stated	Not stated	Not stated	<p>We have engaged with the relevant ICB throughout plan preparation.</p> <p>The council has a strong track record of delivering affordable housing and Policy HC3 will ensure that this continues. This can meet the needs of NHS staff where they are successful through the allocations process, but it is not considered necessary to specifically identify affordable housing for specific sectors of the workforce. If allocations were made for specific NHS staff, then proximity to hospitals would be a key locational requirement and the lack of hospitals in the district means there are unlikely to be suitable locations in the district.</p>
Advance Land & Planning for Seabridge Developments	AGT24-002-02-01	Policy HC3	Note that the latest SHMA identifies an affordable housing requirement of around 28% in the North-Eastern Locality 3, nevertheless we support the proposed affordable housing target of 30%.	Not stated	Not stated	Not stated	Comments noted.
Advance Land & Planning for Stephens, M	AGT24-002-03-01	Policy HC3	Note that the latest SHMA identifies an affordable housing requirement of around 28% in the North-Eastern Locality 3, nevertheless we support the proposed affordable housing target of 30%.	Not stated	Not stated	Not stated	Comments noted.
Pegasus Group for BDW Trading Ltd	AGT24-030-01-11	Policy HC3	In terms of the prescribed split between the tenures, we do not consider that the lack of flexibility within this part of the policy is justified. Different proportions of social rent and shared ownership should be allowed to come forward, based on the latest evidence of need at the time of making a planning application. The shared ownership definition should also be broadened so that it encapsulated all other affordable routes to home ownership in line with the NPPF definition.	Not stated	No	Not stated	The Strategic Housing Market Assessment has set out the recommended split of affordable housing in order to most effectively meet need across the district over the plan period. The requirement for plans to be reviewed in full or in part every 5 years will provide the opportunity to update the policy, should the latest Housing Market Assessment indicate this to no longer be appropriate. It is important to be clear on the Council's expectations for tenure split, as set out in the draft policy, as this will impact on viability

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							and therefore site deliverability.  The Council has set out its justification for requiring shared ownership in the Affordable Housing and Housing Mix Topic Paper.  No change proposed.
AJ Carter Consulting for Jeavons	AGT24-003-01-02	Policy HC3	The policy provides a total of 1075 homes outside of the market and first home tenures. Equivalent to approximately 24% of all new homes over the plan period. The proposed affordable housing policy HC3 leaves the majority of the delivery emphasis to major housing development sites. The reality is that developers have a considerable capital burden in delivering major housing sites at scale, and the result is a consistent below policy position delivery of affordable homes. Absent a clear and robust strategy on site allocation for affordable homes the Council will experience under delivery year on year over the plan period.	Yes	No	Yes	The Council has a very strong track record of delivering policy compliant levels of affordable housing in the past through S106 sites. In addition, the Viability Study has demonstrated a requirement for 30% affordable housing to be viable, alongside the wide range of other policy requirements. The Council is therefore confident that the required levels of affordable housing will be delivered over the plan period.  No change proposed.
RCA Regeneration for Barberry Developments	AGT24-035-01-02	Policy HC3	We agree with Policy HC3 that 30% affordable housing should be delivered at the tenure mix as described within the policy. On small sites of less than c.10 units, specific wording should be added to allow a given lower end threshold for on-site affordable housing, below which an off-site payment in lieu may be provided.	No	No	No	The NPPF confirms that affordable housing should only be required on major development sites. As per the PPG, in designated rural areas local planning authorities may instead choose to set their own lower threshold in plans and seek affordable housing contributions from developments above that threshold. Only a very small part of the district is covered by a designated rural area, and no site allocations are proposed on this parcel of land. Setting a lower threshold for this area of the district is therefore not considered necessary.  No change proposed.
RCA Regeneration for Seven Capital	AGT24-035-03-02	Policy HC3	We agree with Policy HC3 that 30% affordable housing should be delivered at the tenure mix as described within the policy. On small sites of less than c.10 units, specific wording should be added to allow a given lower end threshold for on-site affordable housing, below which an off-site payment in lieu may be provided.	Not stated	No	No	The NPPF confirms that affordable housing should only be required on major development sites. As per the PPG, in designated rural areas local planning authorities may instead choose to set their own lower threshold in plans and seek affordable housing contributions from developments above that threshold. Only a very small part of the district is covered by a designated rural area, and no site allocations are proposed on this parcel of land. Setting a lower threshold for this area of the district is therefore not considered necessary.  No change proposed.
RCA Regeneration for Richborough	AGT24-035-02-	Policy HC3	We agree with Policy HC3 that 30% affordable housing should be delivered at the tenure mix as described within the policy. On	Not stated	No	No	The NPPF confirms that affordable housing should only be required on major development sites. As

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Estates	02		small sites of less than c.10 units, specific wording should be added to allow a given lower end threshold for on-site affordable housing, below which an off-site payment in lieu may be provided.				per the PPG, in designated rural areas local planning authorities may instead choose to set their own lower threshold in plans and seek affordable housing contributions from developments above that threshold. Only a very small part of the district is covered by a designated rural area, and no site allocations are proposed on this parcel of land. Setting a lower threshold for this area of the district is therefore not considered necessary.  No change proposed.
Evolve Planning & Design for Lovell Homes	AGT24-017-05-01	Policy HC3	Lovell Homes supports the mechanism within HC3 to submit a viability assessment at the application stage if it can be demonstrated that circumstances have changed. Viability is dynamic and the Council's evidence base relates to a snapshot in time.	Not stated	Not stated	Not stated	Comments noted.
Evolve Planning & Design for Keon Homes	AGT24-017-04-01	Policy HC3	Keon Homes supports the mechanism within HC3 to submit a viability assessment at the application stage if it can be demonstrated that circumstances have changed. Viability is dynamic and the Council's evidence base relates to a snapshot in time.	Not stated	Not stated	Not stated	Comments noted.
Evolve Planning & Design for Four Ashes Road Ltd	AGT24-017-03-01	Policy HC3	Four Ashes Road Ltd supports the mechanism within HC3 to submit a viability assessment at the application stage if it can be demonstrated that circumstances have changed. Viability is dynamic and the Council's evidence base relates to a snapshot in time.	Not stated	Not stated	Not stated	Comments noted.
Evolve Planning & Design for Cameron Homes	AGT24-017-02-01	Policy HC3	Cameron Homes supports the mechanism within HC3 to submit a viability assessment at the application stage if it can be demonstrated that circumstances have changed. Viability is dynamic and the Council's evidence base relates to a snapshot in time.	Not stated	Not stated	Not stated	Comments noted.
Evolve Planning & Design for Bloor Homes	AGT24-017-01-09	Policy HC3	Land East of Bilbrook - Bloor Homes supports the mechanism within HC3 to submit a viability assessment at the application stage if it can be demonstrated that circumstances have changed. Viability is dynamic and the Council's evidence base relates to a snapshot in time.	Not stated	Not stated	Not stated	Comments noted.
Harris Lamb for Redrow Homes	AGT24-022-03-08	Policy HC3	RH do not object to the requirement to provide 30% affordable housing within new development. Furthermore, the proposed breakdown of tenure to 25% first homes, 50% social rent and 25% shared ownership provide a useful starting point for considering affordable housing tenures within new development however, we consider the policy should include the ability to negotiate or diverge away from the proportions set out above. This is in order to respond to site specific or location specific requirements thus enabling an appropriate range of affordable units to be provided within new developments that best meet	Yes	No	Not stated	The Strategic Housing Market Assessment has set out the recommended split of affordable housing in order to most effectively meet need across the district over the plan period. The requirement for plans to be reviewed in full or in part every 5 years will provide the opportunity to update the policy, should the latest Housing Market Assessment indicate this to no longer be appropriate. It is important to be clear on the Council's expectations for tenure split, as set out

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			the needs of those that they are intended to meet. As it sounds, the policy is not effective and not therefore sound. We would wish to see a sentence added that reflected the ability to negotiate the specific tenure on a site by site basis using the specified tenure mix as a starting point.				in the draft policy, as this will impact on viability and therefore site deliverability.  No change proposed.
Savills UK Ltd for Clowes Developments Ltd	AGT24-037-02-04	Policy HC3	Clowes objects to HC3 as written because it is not justified. Paragraph 8.11 of the SHMA states that 14.1% of housing should be affordable rent / social rent. It is unclear why the policy wording refers to a requirement for 50% social rent and makes no reference to affordable rent. Further clarification is required on this. Policy HC3 should be amended to state 'where viable' in order to provide sufficient flexibility and allow tenures to be agreed between SSDC and the applicant on a site-by-site basis.	Yes	No	Yes	The Council has set out a clear justification for the provision of social rent rather than affordable rent in the Affordable Housing and Housing Mix topic paper. The primary concern is the genuine affordability of affordable rent in the district.  The PPG is clear that where up-to-date policies have set out the contributions expected from development, planning applications that fully comply with them should be assumed to be viable. Viability should be considered at plan-making stage and should only be revisited at application stage should the applicant clearly demonstrate particular circumstances to justify it.  No change proposed.
Turley Associates for Bellway Homes	AGT24-041-01-02	Policy HC3	Please refer to our previous representations made in December 2022 on this matter at Appendix 1. 2022 Rep – the policy should be less prescriptive in terms of tenure mix, to allow sites to best respond to current housing needs with a location and site-specific approach.	No	No	No	The Strategic Housing Market Assessment has set out the recommended split of affordable housing in order to most effectively meet need across the district over the plan period. The requirement for plans to be reviewed in full or in part every 5 years will provide the opportunity to update the policy, should the latest Housing Market Assessment indicate this to no longer be appropriate. It is important to be clear on the Council's expectations for tenure split, as set out in the draft policy, as this will impact on viability and therefore site deliverability.  No change proposed.
First City Ltd for UKPI Ltd	AGT24-018-02-04	Policy HC3	Policy HC3 requires proposal for major residential development to provide 30% of all dwellings as affordable housing. The use of the term 'major residential development' in this context requires a definition to save confusion as to what size of development affordable housing becomes a requirement, it is presumed to be the same as that within the NPPF Glossary. The Council's position to continue with the established approach of using Section 106 planning obligations to secure the necessary infrastructure to support and mitigate the effects of new development is supported. The frequent reference to further guidance being provided by the Affordable Housing SPD is noted. The SPD should do no more	Not stated	Not stated	Not stated	Major development is defined in the glossary.  No change proposed.

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			than clarify the Local Plan policy. The SPD is not the appropriate approach for setting new policy and or burdens on delivery, and the Plan should provide clarity at the point of adoption as to what it requires				
Marrons Planning for Boningale Homes	AGT24-027-02-01	Policy HC3	The above policy requires the provision of affordable housing on all major development sites. Boningale Homes support the Council in its pursuit of securing affordable housing to meet the needs of local communities across the borough. The Framework is clear that the delivery of affordable housing should account for both need and the effects on development viability. As a general observation the targets up to 40% seem high given the underlying residential sales rates experienced. In addition to more detailed appraisals forming part of the viability evidence base (including how each of the assumptions are being applied), it is not currently clear what underpins the conclusion in regard to affordable housing need.	Not stated	No	Not stated	The Housing Market Assessment indicates a need for 29% of housing provided through the plan to be affordable homes. In addition, the Viability Study has demonstrated a requirement for 30% affordable housing to be viable, alongside the wide range of other policy requirements. A range of typology and site-specific appraisals have been run and are presented with a detailed explanation of the results, including the assumptions applied, within the Viability Study. A 30% policy requirement is therefore considered to be appropriate and justified. Further information on this is provided in Section 8 of the Affordable Housing topic paper.  No change proposed.
Pegasus Group for Richborough Estates	AGT24-030-05-02	Policy HC3	The use of the term 'major residential development' in this context requires a definition. The policy also needs to ensure that evidence is provided when considering viability, especially on brownfield sites. The 30% requirement appears to be supported by the Viability Study but it does highlight the challenges in delivering such a requirement and the need for higher site values to be achieved to deliver this. The Council's position to continue using S106 agreements to secure the necessary infrastructure to support and mitigate development is supported.	Yes	No	Yes	Major development is defined in the glossary. The Council's approach to viability testing at application stage (assuming the applicant has provided sufficient evidence to justify its consideration) will be set out in the Affordable Housing SPD.  No change proposed.
Pegasus Group for Richborough Estates	AGT24-030-05-02	Policy HC3	The requirement to 'pepper pot' affordable housing is generally supported. However, the policy should recognise that for management purposes, Registered Providers do require a degree of clustering of affordable housing within a development. Richborough supports the removal of the suggestion that grant funding for homes to be provided under the requirements of the policy. The frequent reference to the Affordable Housing SPD is noted, but it should do no more than clarify the Local Plan policy.	Yes	No	Yes	The Council is aware of the impact of affordable housing unit location for RPs but does not consider additional wording is required in the policy to clarify this.  No change proposed.
CPRE Staffordshire	STA24-013-06	Policy HC3	The element of the affordable housing for overspill should be available to qualifying from the authorities seeking the overspill provision.	Not stated	Not stated	No	This is not considered to be a matter to address through the affordable housing policy wording.  No change proposed.
Pegasus Group for Clowes Developments	AGT24-030-02-02	Policy HC3	The use of the term 'major residential development' in this context requires a definition. The policy also needs to ensure that evidence is provided when considering viability, especially on brownfield sites. The 30% requirement appears to be	Not stated	No	No	Major development is defined in the glossary. The Council's approach to viability testing at application stage (assuming the applicant has provided sufficient evidence to justify its



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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			supported by the Viability Study but it does highlight the challenges in delivering such a requirement and the need for higher site values to be achieved to deliver this. The Council's position to continue using S106 agreements to secure the necessary infrastructure to support and mitigate development is supported.				consideration) will be set out in the Affordable Housing SPD.  No change proposed.
Pegasus Group for Clowes Developments	AGT24-030-02-02	Policy HC3	The requirement to 'pepper pot' affordable housing is generally supported. However, the policy should recognise that for management purposes, Registered Providers do require a degree of clustering of affordable housing within a development. Clowes supports the removal of the suggestion that grant funding for homes to be provided under the requirements of the policy. The frequent reference to the Affordable Housing SPD is noted, but it should do no more than clarify the Local Plan policy.	Not stated	No	No	The Council is aware of the impact of affordable housing unit location for RPs but does not consider additional wording is required in the policy to clarify this.  No change proposed.
Pegasus Group for Miller Homes	AGT24-030-03-15	Policy HC3	We do not consider that the lack of flexibility in this policy is justified. Different proportions of social rent and shared ownership should be allowed to come forward, based on the latest evidence of need at the time of making a planning application. The shared ownership definition should be broadened to encapsulate all other affordable routes to home ownership.	Not stated	No	No	The Strategic Housing Market Assessment has set out the recommended split of affordable housing in order to most effectively meet need across the district over the plan period. The requirement for plans to be reviewed in full or in part every 5 years will provide the opportunity to update the policy, should the latest Housing Market Assessment indicate this to no longer be appropriate. It is important to be clear on the Council's expectations for tenure split, as set out in the draft policy, as this will impact on viability and therefore site deliverability.  The Council has set out its justification for requiring shared ownership in the Affordable Housing and Housing Mix Topic Paper.  No change proposed.
Pegasus Group for Persimmon Homes	AGT24-030-04-01	Policy HC3	The use of the term 'major residential development' in this context requires a definition. The 30% requirement appears to be supported by the Viability Study but it does highlight the challenges in delivering such a requirement and the need for higher site values to be achieved to deliver this. Both HC3 and HC1 should introduce greater flexibility to allow for viability to be considered alongside the mix identified within an up-to-date SHMA. The requirement to 'pepper pot' affordable housing is generally supported. However, the policy should recognise that for management purposes, Registered Providers do require a degree of clustering of affordable housing within a development. The frequent reference to the Affordable Housing SPD is noted, but it should do no more than clarify the Local Plan policy. The policy is considered unsound as it is neither justified nor consistent with national policy.	Not stated	No	Not stated	Major development is defined in the glossary.  The PPG is clear that where up-to-date policies have set out the contributions expected from development, planning applications that fully comply with them should be assumed to be viable. Viability should be considered at plan-making stage and should only be revisited at application stage should the applicant clearly demonstrate particular circumstances to justify it. No change to the policy wording is therefore considered necessary.  The Council is aware of the impact of affordable housing unit location for RPs but does not consider additional wording is required in the

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							policy to clarify this.  No change proposed.
Pegasus Group for Taylor Wimpey	AGT24-030-08-02	Policy HC3	The use of the term 'major residential development' in this context requires a definition. The 30% requirement appears to be supported by the Viability Study but it does highlight the challenges in delivering such a requirement and the need for higher site values to be achieved to deliver this. The Council's position to continue using S106 agreements to secure the necessary infrastructure to support and mitigate development is supported.  The requirement to 'pepper pot' affordable housing is generally supported. However, the policy should recognise that for management purposes, Registered Providers do require a degree of clustering of affordable housing within a development. The frequent reference to the Affordable Housing SPD is noted, but it should do no more than clarify the Local Plan policy.	Not stated	No	Not stated	Major development is defined in the glossary.  The Council is aware of the impact of affordable housing unit location for RPs but does not consider additional wording is required in the policy to clarify this.  No change proposed.
Home Builders Federation	STA24-024-02	Policy HC3	Policy HC3 is unsound because it is not positively prepared, is not effective or justified, and does not comply with national policy. To be fully effective this policy should allow for some flexibility and negotiation around housing mix and type to enable site specific considerations to be taken into account. HBF suggest the policy wording should include the opportunity for negotiation around policy requirements for site specific reasons, as any sites whose circumstances fall outside the parameters of the typologies tested could already be unviable under the proposed Local Plan policies. The PPG viability guidance which does allow for site specific viability considerations to be taken into account, and the wording of this policy should reflect that.  If the Council wish to provide additional advice on the interpretation of any policy, this should be done through a Supplementary Planning Document, which is prepared and consulted on after the Local Plan policy has been adopted. Any reference to any future SPD should be moved from the policy to the supporting text. Seeking to give Local Plan status to an existing, or emerging SPD is not appropriate.	No	No	No	The PPG is clear that where up-to-date policies have set out the contributions expected from development, planning applications that fully comply with them should be assumed to be viable. Viability should be considered at plan-making stage and should only be revisited at application stage should the applicant clearly demonstrate particular circumstances to justify it. No change to the policy wording is therefore considered necessary as the PPG is explicit on this issue.  A revised Affordable Housing SPD will be prepared following adoption of the Local Plan to provide additional guidance on the policy.  No change proposed.
The Planning Bureau for McCarthy Stone	AGT24-033-01-01	Policy HC3	As a minimum flexibility should be provided within the plan for the older persons typology for the plan to be justified and consistent with its own evidence. The following could be introduced to paragraph 9 of the policy 'Such an exceptional circumstance includes the provision of specialist housing for older people where viability is found to be more marginal'. In addition the Viability Assessment should be re-run, including the older persons housing typology properly, using the correct assumptions in line with the RHG briefing note. The outcomes of this update should be incorporated into the plan.	No	No	No	The PPG already sets out examples of circumstances that may justify a viability assessment at application stage; this includes where particular types of development are proposed which may significantly vary from standard models of development for sale such as housing for older people. Additional wording in the policy is not therefore considered necessary.  The assumptions for the Viability Assessment are considered appropriate as set out in the Further

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							Note on Viability: Follow-up to Regulation 19 Consultation (November 2024).  No change proposed.
Robins, D	RES24-199-02	Policy HC3	This amounts to 70% of new development being 'unaffordable'. This does not address need.  50% social housing, 25% part buy, 25% 'affordable' would address housing need on a local level with fewer new builds. There are adequate houses for sale for those who can afford without more being built.	Yes	No	No	The Housing Market Assessment indicates a need for 29% of housing provided through the plan to be affordable homes. A 30% requirement in this policy is therefore considered appropriate.  No change proposed.
Webb, L	RES24-248-07	Policy HC3	The provision of 30% affordable housing on a site by site basis is supported within the plan. However, wholly affordable sites should be recognised as providing a substantial benefit to meeting the current shortfall within South Staffordshire. The current tenure split (25% First Homes, 50% Social Rent, 25% Shared Ownership) should also be reviewed on a site-by-site basis to ensure the sites remain viable and deliverable.	Not stated	Not stated	Not stated	Policies HC6 and HC7 set out the Council's approach to affordable housing development on rural exception sites and First Homes exception sites.  The Strategic Housing Market Assessment has set out the recommended split of affordable housing in order to most effectively meet need across the district over the plan period. The requirement for plans to be reviewed in full or in part every 5 years will provide the opportunity to update the policy, should the latest Housing Market Assessment indicate this to no longer be appropriate. It is important to be clear on the Council's expectations for tenure split, as set out in the draft policy, as this will impact on viability and therefore site deliverability.  No change proposed.
<b>POLICY HC4: Homes for Older People</b>							
Cheslyn Hay Parish Council	STA24-011-01	Policy HC4	Accommodation suitable for downsizing and bungalows are required in the Parish for an ageing population	Not stated	No	Not stated	Comments noted.  The Council considers this policy makes a significant contribution to meeting the needs of the district's ageing population.
West Midlands Housing Association Planning Consortium (Tetlow King)	STA24-050-02	Policy HC4	Policy HC4 requires that all major developments will be required to ensure that 100% of both market and affordable housing delivery meets the higher access standards Part M4(2) Category 2. The WMHAPC queries the need for this blanket requirement given it is unclear if there is a need for 100% of new homes to be built to this accessibility standard. The sole reference to the technical standards in the NPPF (2023) is on page 40, footnote 52 which states: "Planning policies for housing should make use of the Government's optional technical standards for accessible and	Not stated	Not stated	Not stated	The Strategic Housing Market Assessment 2022 recommends that based on the evidence of need, a policy requiring all properties to meet Category 2 standards would be the most effective approach. In addition, this requirement has been tested as part of the Viability Study and has been demonstrated to be viable alongside all other policy requirements. Further information on the Council's justification for this approach is set out in section 4 of the Homes for Older and Disabled People Topic Paper.

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			adaptable housing, where this would address an identified need for such properties." (Emphasis added) Footnote 52 states that the accessibility technical standards are optional and should only be required where there is a demonstrated need. Without the appropriate evidence, a blanket application of accessibility standards may undermine the viability of development schemes across South Staffordshire, resulting in fewer affordable homes being delivered across the authority.				No change proposed.
Staffordshire County Council	STA24-044-07	Policy HC4	The Plan has good coverage in relation to Health and Well-being in general, which is acknowledged. The data shows that the District has an increasingly ageing population. This is referred to well across the document and the Plan seeks to address it with proposals for specialist elderly housing, and with references to accessible and adaptable homes. However, given the demographics this we believe this could have gone further. For example, using the homes for life idea there is scope for development of housing for all, where people are able to grow old with minor adaptations. Homes for life – Guide to accessible homes   Centre for Ageing Better (ageing-better.org.uk)	Yes	Yes	Yes	Comments noted.  Policy HC4 confirms that 100% of dwellings will be required to meet Part M4(2) of Building Regulations. The Council considers this will make a significant contribution to meeting the needs of older people, both now and also into the future, by allowing easier adaptations to properties as the needs of households change over time.  No change proposed.
First City for St Mary's Presbytery and The Archdiocese of Birmingham	AGT24-018-01-06	Policy HC4	The policy wording does not define 'older people', so it is unclear as to exactly who this Policy is targeting or who would be eligible to occupy such dwellings. It stipulates that all major development should provide bungalows, age restricted single storey accommodation such as flats and maisonettes, sheltered/retirement living and extra care housing with care and other supported living. It is unclear if the policy is requiring ALL of the above-mentioned housing types on all sites or whether a site should include one or some of the housing. If it is the former, we consider this to be overly prescriptive of enforcing every major site to accommodate all housing types in addition to all other policy requirements such as those set out within policies HC 1,2,3,5 and 8 in addition to open space needs and biodiversity net gain requirements etc. Site 079 Kiddemore Green Road would provide a percentage of bungalows and retirement living in a sustainable location and considering this it should be retained as an allocation.	Not stated	Not stated	Not stated	'Older People' is defined within the NPPF; therefore, it is not considered necessary to provide a definition within the policy wording.  Comments noted. The type of homes for older people which should be provided (including which category or categories from the list in the policy) will be dependent on circumstances of each specific site. The Council will update the policy wording to reflect this.  <b>Proposed change</b>  <b>See Minor Modification 013</b>  <ul style="list-style-type: none"><li>• Bungalows</li><li>• Other age restricted single storey accommodation such as flats and maisonettes</li><li>• Sheltered/retirement living</li><li>• Extra care/housing with care and other supported living</li></ul> <b>The category or categories of housing type from the above list that should be provided will be dependent on individual site circumstances.</b>  Site options have been assessed against a consistent set of planning criteria to determine

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							proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.
Avison Young for Crest Nicholson	AGT24-004-02-03	Policy HC4	Policy HC4 is vague, it is unclear how it would be applied by a decision-maker in the consideration of individual applications for planning permission. This fails to comply with part d) of paragraph 16 of the NPPF and requires clarification to avoid situations where the ambiguity in policy leads to delays in delivery of much needed homes. Crest is not convinced that a requirement for 100% of dwellings to comply with M4(2) standards is justified having regard to national policy and guidance.	Yes	No	Not stated	<p>Comments noted.</p> <p>Policy wording amended to add clarity.</p> <p><b>Proposed change</b> <b>See Minor Modification 013</b></p> <ul style="list-style-type: none"> <li>• Bungalows</li> <li>• Other age restricted single storey accommodation such as flats and maisonettes</li> <li>• Sheltered/retirement living</li> <li>• Extra care/housing with care and other supported living</li> </ul> <p><b>The category or categories of housing type from the above list that should be provided will be dependent on individual site circumstances.</b></p> <p>The NPPF states that planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties. The Strategic Housing Market Assessment 2022 recommends that based on the evidence of need, a policy requiring all properties to meet Category 2 standards would be the most effective approach. In addition, this requirement has been tested as part of the Viability Study and has been demonstrated to be viable alongside all other policy requirements. Further information on the Council's justification for this approach is set out in section 4 of the Homes for Older and Disabled People Topic Paper.</p> <p>No change proposed.</p>
Avison Young for Beard, G	AGT24-004-01-02	Policy HC4	Our client supports the policy as drafted. 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. In these terms the land at the Bradshaws Estate should be brought forward to meet the needs of the ageing population.	No	No	No	<p>Comments noted.</p> <p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024. Specialist housing allocations are being made as detailed in the Homes for Older and Disabled People Topic Paper.</p>



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Pegasus Group for BDW Trading Ltd	AGT24-030-01-11	Policy HC4	We do not consider that this policy is justified in terms of the requirement for 100% of homes to be M4(2). The figure for M4(2) homes in the Housing Market Assessment Update does not take account of the accessibility and adaptability of existing housing stock, and the topic paper also notes that it is not possible to demonstrate this, owing to the lack of data available.	Not stated	No	Not stated	Whilst data on the accessibility standards of existing stock is not available, the Strategic Housing Market Assessment 2022 nonetheless recommends that based on the evidence of need, a policy requiring all properties to meet Category 2 standards would be the most effective approach. In addition, this requirement has been tested as part of the Viability Study and has been demonstrated to be viable alongside all other policy requirements. Further information on the Council's justification for this approach is set out in section 4 of the Homes for Older and Disabled People Topic Paper.  No change proposed.
RCA Regeneration for Barberry Developments	AGT24-035-01-02	Policy HC4	We agree with Policy HC4 & HC5 and the need to provide homes for older people and those with special housing requirements.	No	No	No	Comments noted.
RCA Regeneration for Seven Capital	AGT24-035-03-02	Policy HC4	We agree with Policy HC4 & HC5 and the need to provide homes for older people and those with special housing requirements.	Not stated	No	No	Comments noted.
Evolve Planning & Design for Lovell Homes	AGT24-017-05-01	Policy HC4	It is considered that a specific requirement for bungalows is not appropriate if instead the Council pursues a policy of requiring 100% of all homes to meet optional M4(2) requirements. The Government has consulted on raising accessibility standards for new homes but the requirement for all homes to meet M4(2) standards is yet to be mandated. If the Council intends to pursue a policy in respect of M4(2) standards this must be evidenced. Lovell Homes considers that whilst there may be justification for implementing optional M4(2) standards, the 100% requirement is not justified. The Policy should be amended to require a maximum of 50% of all new homes to be delivered to meet the optional M4(2) standards, especially where this could be in addition to other homes for older people and others with special housing requirements required by Policy HC4.	Yes	No	Yes	The Council considers a mixed approach of requiring accessible and adaptable homes as well as specific property types (such as bungalows) is the most appropriate, in order to meet immediate needs, and also futureproof the district's housing stock for those reaching older age later in the plan period. This is in line with the PPG.  The Strategic Housing Market Assessment 2022 recommends that based on the evidence of need, a policy requiring all properties to meet Category 2 standards would be the most effective approach. There is no evidence to suggest a 50% requirement would be more appropriate. In addition, the 100% requirement has been tested as part of the Viability Study and has been demonstrated to be viable alongside all other policy requirements. Further information on the Council's justification for this approach is set out in section 4 of the Homes for Older and Disabled People Topic Paper.  No change proposed.
Evolve Planning & Design for Keon Homes	AGT24-017-04-01	Policy HC4	It is considered that a specific requirement for bungalows is not appropriate if instead the Council pursues a policy of requiring 100% of all homes to meet optional M4(2) requirements.	Yes	No	Yes	The Council considers a mixed approach of requiring accessible and adaptable homes as well as specific property types (such as bungalows) is

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**CHAPTER 7 & POLICIES HC1-HC9: DELIVERING THE RIGHT HOMES**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>The Government has consulted on raising accessibility standards for new homes but the requirement for all homes to meet M4(2) standards is yet to be mandated. If the Council intends to pursue a policy in respect of M4(2) standards this must be evidenced. Keon Homes considers that whilst there may be justification for implementing optional M4(2) standards, the 100% requirement is not justified.</p> <p>The Policy should be amended to require a maximum of 50% of all new homes to be delivered to meet the optional M4(2) standards, especially where this could be in addition to other homes for older people and others with special housing requirements required by Policy HC4.</p>				<p>the most appropriate, in order to meet immediate needs, and also futureproof the district's housing stock for those reaching older age later in the plan period. This is in line with the PPG.</p> <p>The Strategic Housing Market Assessment 2022 recommends that based on the evidence of need, a policy requiring all properties to meet Category 2 standards would be the most effective approach. There is no evidence to suggest a 50% requirement would be more appropriate. In addition, the 100% requirement has been tested as part of the Viability Study and has been demonstrated to be viable alongside all other policy requirements. Further information on the Council's justification for this approach is set out in section 4 of the Homes for Older and Disabled People Topic Paper.</p> <p>No change proposed.</p>
Evolve Planning & Design for Four Ashes Road Ltd	AGT24-017-03-01	Policy HC4	<p>It is considered that a specific requirement for bungalows is not appropriate if instead the Council pursues a policy of requiring 100% of all homes to meet optional M4(2) requirements.</p> <p>The Government has consulted on raising accessibility standards for new homes but the requirement for all homes to meet M4(2) standards is yet to be mandated. If the Council intends to pursue a policy in respect of M4(2) standards this must be evidenced. Four Ashes Road Ltd considers that whilst there may be justification for implementing optional M4(2) standards, the 100% requirement is not justified.</p> <p>The Policy should be amended to require a maximum of 50% of all new homes to be delivered to meet the optional M4(2) standards, especially where this could be in addition to other homes for older people and others with special housing requirements required by Policy HC4.</p>	Yes	No	Yes	<p>The Council considers a mixed approach of requiring accessible and adaptable homes as well as specific property types (such as bungalows) is the most appropriate, in order to meet immediate needs, and also futureproof the district's housing stock for those reaching older age later in the plan period. This is in line with the PPG.</p> <p>The Strategic Housing Market Assessment 2022 recommends that based on the evidence of need, a policy requiring all properties to meet Category 2 standards would be the most effective approach. There is no evidence to suggest a 50% requirement would be more appropriate. In addition, the 100% requirement has been tested as part of the Viability Study and has been demonstrated to be viable alongside all other policy requirements. Further information on the Council's justification for this approach is set out in section 4 of the Homes for Older and Disabled People Topic Paper.</p> <p>No change proposed.</p>
Evolve Planning & Design for Cameron Homes	AGT24-017-02-01	Policy HC4	<p>It is considered that a specific requirement for bungalows is not appropriate if instead the Council pursues a policy of requiring 100% of all homes to meet optional M4(2) requirements.</p> <p>The Government has consulted on raising accessibility standards</p>	Yes	No	Yes	<p>The Council considers a mixed approach of requiring accessible and adaptable homes as well as specific property types (such as bungalows) is the most appropriate, in order to meet</p>

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**CHAPTER 7 & POLICIES HC1-HC9: DELIVERING THE RIGHT HOMES**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>for new homes but the requirement for all homes to meet M4(2) standards is yet to be mandated. If the Council intends to pursue a policy in respect of M4(2) standards this must be evidenced. Cameron Homes considers that whilst there may be justification for implementing optional M4(2) standards, the 100% requirement is not justified.</p> <p>The Policy should be amended to require a maximum of 50% of all new homes to be delivered to meet the optional M4(2) standards, especially where this could be in addition to other homes for older people and others with special housing requirements required by Policy HC4.</p>				<p>immediate needs, and also futureproof the district's housing stock for those reaching older age later in the plan period. This is in line with the PPG.</p> <p>The Strategic Housing Market Assessment 2022 recommends that based on the evidence of need, a policy requiring all properties to meet Category 2 standards would be the most effective approach. There is no evidence to suggest a 50% requirement would be more appropriate. In addition, the 100% requirement has been tested as part of the Viability Study and has been demonstrated to be viable alongside all other policy requirements. Further information on the Council's justification for this approach is set out in section 4 of the Homes for Older and Disabled People Topic Paper.</p> <p>No change proposed.</p>
Evolve Planning & Design for Bloor Homes	AGT24-017-01-09	Policy HC4	<p>It is considered that a specific requirement for bungalows is not appropriate if instead the Council pursues a policy of requiring 100% of all homes to meet optional M4(2) requirements. The Government has consulted on raising accessibility standards for new homes but the requirement for all homes to meet M4(2) standards is yet to be mandated. If the Council intends to pursue a policy in respect of M4(2) standards this must be evidenced. Bloor Homes Ltd considers that whilst there may be justification for implementing optional M4(2) standards, the 100% requirement is not justified.</p> <p>The Policy should be amended to require a maximum of 50% of all new homes to be delivered to meet the optional M4(2) standards, especially where this could be in addition to other homes for older people and others with special housing requirements required by Policy HC4.</p>	Yes	No	Yes	<p>The Council considers a mixed approach of requiring accessible and adaptable homes as well as specific property types (such as bungalows) is the most appropriate, in order to meet immediate needs, and also futureproof the district's housing stock for those reaching older age later in the plan period. This is in line with the PPG.</p> <p>The Strategic Housing Market Assessment 2022 recommends that based on the evidence of need, a policy requiring all properties to meet Category 2 standards would be the most effective approach. There is no evidence to suggest a 50% requirement would be more appropriate. In addition, the 100% requirement has been tested as part of the Viability Study and has been demonstrated to be viable alongside all other policy requirements. Further information on the Council's justification for this approach is set out in section 4 of the Homes for Older and Disabled People Topic Paper.</p> <p>No change proposed.</p>
Harris Lamb for Redrow Homes	AGT24-022-03-09	Policy HC4	<p>RH do not object in principle to the requirement to meet specific needs of older people and other groups with specialist requirements. In the case of RH this would typically involve the delivery of bungalows or other age restricted single storey accommodation such as flats and maisonettes.</p>	Yes	No	Not stated	<p>Comments noted. Policy wording amended to add clarity and confirm the types of homes for older people to be provided will be dependent on-site circumstances.</p>

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**CHAPTER 7 & POLICIES HC1-HC9: DELIVERING THE RIGHT HOMES**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>The policy is not explicit in terms of what proportion of the total of these forms of housing should be provided and the policy could be clearer in terms of setting out what would be required when bringing development proposals forward. The delivery of bungalows is land hungry and could undermine the objective of achieving the 35dph requirement set out in policy HC2. The requirement to require developers to provide specialist accommodation should be softened to state that the Council should seek to negotiate. As such, we consider it unsound as it is not effective.</p> <p>The policy should be reworded to state that the Council will seek to negotiate with developers to meet the needs of specific groups rather than requiring them to do so. (Proposed rewording of policy can be found in full representation).</p>				<p><b>Proposed change</b> <b>See Minor Modification 013</b></p> <ul style="list-style-type: none"> <li>• Bungalows</li> <li>• Other age restricted single storey accommodation such as flats and maisonettes</li> <li>• Sheltered/retirement living</li> <li>• Extra care/housing with care and other supported living</li> </ul> <p><b>The category or categories of housing type from the above list that should be provided will be dependent on individual site circumstances.</b></p>
Savills UK Ltd for Clowes Developments Ltd	AGT24-037-02-05	Policy HC4	Clowes objects to HC4 as written because it is not justified, effective, or in accordance with national policy. In order to be justified in line with the PPG and NPPF, policy HC4 should be supported by a detailed analysis of how the Council considers these criteria to have been adequately addressed and evidenced. The evidence should be used as the rationale to ensure that prescribed standards in policy are not unachievable or unviable.	Yes	No	Yes	<p>The Council's justification for this policy is set out in detail in the Homes for Older and Disabled People Topic Paper. This includes evidence of need and viability findings.</p> <p>Minor modification proposed as set out above, no further changes proposed.</p>
Savills UK Ltd for Taylor Wimpey	AGT24-037-05-04	Policy HC4	It is considered that a specific requirement for bungalows is not appropriate if instead the Council pursues a policy of requiring 100% of all homes to meet optional M4(2) requirements. The Government has consulted on raising accessibility standards for new homes but the requirement for all homes to meet M4(2) standards is yet to be mandated. If the Council intends to pursue a policy in respect of M4(2) this must be evidenced. It is also not clear why the figures in the SHMA have altered so significantly in such a short space of time. The policy should be amended to require a maximum of 30% of all new homes to be delivered to meet M4(2) standards.	Not stated	No	Not stated	<p>The Council considers a mixed approach of requiring accessible and adaptable homes as well as specific property types (such as bungalows) is the most appropriate, in order to meet immediate needs, and also futureproof the district's housing stock for those reaching older age later in the plan period. This is in line with the PPG.</p> <p>The Strategic Housing Market Assessment 2022 recommends that based on the evidence of need, a policy requiring all properties to meet Category 2 standards would be the most effective approach. There is no evidence to suggest a 30% requirement would be more appropriate. In addition, the 100% requirement has been tested as part of the Viability Study and has been demonstrated to be viable alongside all other policy requirements. Further information on the Council's justification for this approach is set out in section 4 of the Homes for Older and Disabled People Topic Paper.</p> <p>No change proposed.</p>
Turley Associates for Bellway Homes	AGT24-041-01-	Policy HC4	Please refer to our previous representations made in December 2022 on this matter at Appendix 1. 2022 Rep – Bellway support	No	No	No	The Council considers that the PPG criteria have been met in terms of justifying higher

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
	02		the provision of accessible homes that are suitable to meet the needs of older people, however if the Council is to adopt the higher optional standards within the Building Regulations for accessible and adaptable homes, it should only do so by applying the criteria set out in the PPG.				accessibility standards.  No change proposed.
First City Ltd for UKPI Ltd	AGT24-018-02-05	Policy HC4	<p>The policy wording does not define 'older people', so it is unclear as to exactly who this Policy is targeting or who would be eligible to occupy such dwellings.</p> <p>It stipulates that all major development should provide bungalows, age restricted single storey accommodation such as flats and maisonettes, sheltered/retirement living and extra care housing with care and other supported living.</p> <p>It is unclear if the policy is requiring ALL of the above-mentioned housing types on all sites or whether a site should include one or some of the housing types.</p> <p>If it is the former, we consider this to be overly prescriptive of enforcing every major site to accommodate all housing types in addition to all other policy requirements such as those set out within policies HC 1,2,3,5 and 8 in addition to open space needs and biodiversity net gain requirements etc.</p> <p>It is important to note not all sites should be treated in the same way and certain types of housing are better suited to particular sites based on their location, size and the surroundings and the level of older people and other special housing elsewhere within the settlement. Therefore a one size fits all approach is not appropriate and unsound.</p> <p>There needs to be a level of flexibility applied on a site by site basis to ensure sites have a level of individuality and take into consideration the surrounding area.</p>	Not stated	Not stated	Not stated	<p>'Older People' is defined within the NPPF; therefore, it is not considered necessary to provide a definition within the policy wording.</p> <p>Comments noted.</p> <p>The type of homes for older people which should be provided (including which category or categories from the list in the policy) will be dependent on circumstances of each specific site. The Council will update the policy wording to reflect this.</p> <p><b>Proposed change</b> <b>See Minor Modification 013</b></p> <ul style="list-style-type: none"> <li>• Bungalows</li> <li>• Other age restricted single storey accommodation such as flats and maisonettes</li> <li>• Sheltered/retirement living</li> <li>• Extra care/housing with care and other supported living</li> </ul> <p><b>The category or categories of housing type from the above list that should be provided will be dependent on individual site circumstances.</b></p>
Marrons Planning for L&Q Estates	AGT24-027-03-01	Policy HC4	Draft Policy HC4 seeks to require compliance with Building Regulations Part M4(2) without sufficient evidence. The requirement for compliance Building Regulations Part M4(2) in draft Policy HC4 should be deleted, or draft Policy HC4 should be amended to provide support for compliance with Building Regulations Part M4(2) where appropriate	Yes	No	Yes	<p>The Strategic Housing Market Assessment 2022 recommends that based on the evidence of need, a policy requiring all properties to meet Category 2 standards would be the most effective approach. In addition, the 100% requirement has been tested as part of the Viability Study and has been demonstrated to be viable alongside all other policy requirements. Further information on the Council's justification for this approach is set out in section 4 of the Homes for Older and Disabled People Topic Paper.</p> <p>No change proposed.</p>
Grade Planning	AGT24-021-01-	Policy HC4	As currently worded the policy wording implies that all four housing types should be provided within major development,	Yes	Yes	Yes	Comments noted.



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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
	02		which is not the case. The policy should make clear that only one or more of these housing types would be expected to be provided.				<p>Policy wording amended to add clarity and confirm the types of homes for older people to be provided will be dependent on-site circumstances.</p> <p><b>Proposed change</b> <b>See Minor Modification 013</b></p> <ul style="list-style-type: none"> <li>• Bungalows</li> <li>• Other age restricted single storey accommodation such as flats and maisonettes</li> <li>• Sheltered/retirement living</li> <li>• Extra care/housing with care and other supported living</li> </ul> <p><b>The category or categories of housing type from the above list that should be provided will be dependent on individual site circumstances.</b></p>
Marrons Planning for Boningale Homes	AGT24-027-02-01	Policy HC4	Current provision is largely focused on sheltered housing and care homes. However, these do not address the ever-rising demand from homeowners to access age-appropriate housing, of the same tenure. The Council's evidence base identifies a critical need for specialist accommodation, The Housing Market Assessment 2024 indicates approximately one third (36.5%) of the population will be aged 60 or over in 2041. The Housing Market Assessment 2024 indicates a need for 1,198 additional specialist homes up to 2041, including 1,000 sheltered homes, and 198 extra care units. A further 153 additional registered care spaces may also be required. Whilst we accept that not all 'care schemes' should be classed as C2, a blanket approach to the provision of affordable housing would result in affordable housing being required on schemes which are already being delivered in order to address a specific specialist need. This is considered unacceptable and will not aid in the delivery of specialist accommodation to meet the needs of older and vulnerable residents. The Council should support development opportunities, such as those proposed by Boningale Homes at Codsall and Hockerhill Farm that seek to provide modern, state-of-the-art specialist care facilities to meet the identified need within the District.	Not stated	No	Not stated	<p>The NPPF and PPG do not offer any exemption to specialist housing for providing affordable housing. The Council has also successfully secured affordable housing contributions on a number of specialist housing schemes in the past. It is not considered that requiring affordable housing for such schemes will hinder delivery.</p> <p>No change proposed.</p>
Pegasus Group for Richborough Estates	AGT24-030-05-02	Policy HC4	The policy needs to define 'older people' as it is unclear as to exactly who the policy is targeting or who would be eligible to occupy such dwellings. The Council do not define what ages will be restricted for single storey development and, as such, the policy requires clarification. There is no evidence to suggest that the provisions of HC4 have been subject to viability testing for	Yes	No	Yes	'Older People' is defined within the NPPF; therefore, it is not considered necessary to provide a definition within the policy wording. It is also not clear what the purpose of including an age restriction within the policy wording itself would be.

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			major developments. Extra care and retirement living often need a minimum critical mass to be viable and the Council needs to determine which should be able to support the provision of such accommodation, it also needs to provide much greater clarity on when such housing will be required and to make clear that some housing types may be required on any given site.				<p>The Viability Study confirms Policy HC4 is reflected in the assumed housing mix as part of the viability testing.</p> <p>Policy wording amended to add clarity and confirm the types of homes for older people to be provided will be dependent on-site circumstances.</p> <p><b>Proposed change</b> <b>See Minor Modification 013</b></p> <ul style="list-style-type: none"> <li>• Bungalows</li> <li>• Other age restricted single storey accommodation such as flats and maisonettes</li> <li>• Sheltered/retirement living</li> <li>• Extra care/housing with care and other supported living</li> </ul> <p><b>The category or categories of housing type from the above list that should be provided will be dependent on individual site circumstances.</b></p>
Pegasus Group for Richborough Estates	AGT24-030-05-02	Policy HC4	It is noted that the Plan continues to require 100% of all housing to be M4(2) compliant. This raises an issue of affordability. Whilst the principle is agreed, it is not a requirement of the whole population to have such a provision and delivering this will have an impact on the overall capacity of sites to deliver new homes. The M4(2) standard is optional within Building Regulations, if the Government had intended that evidence of an ageing population alone justifies adoption of optional standards, then such standard would be mandatory. The requirement for 100% M4(2) homes is not considered to be adequately justified.	Yes	No	Yes	<p>The Strategic Housing Market Assessment 2022 recommends that based on the evidence of need, a policy requiring all properties to meet Category 2 standards would be the most effective approach. In addition, the 100% requirement has been tested as part of the Viability Study and has been demonstrated to be viable alongside all other policy requirements.</p> <p>No change proposed.</p>
Pegasus Group for Clowes Developments	AGT24-030-02-02	Policy HC4	The policy needs to define 'older people' as it is unclear as to exactly who the policy is targeting or who would be eligible to occupy such dwellings. The Council do not define what ages will be restricted for single storey development and, as such, the policy requires clarification. There is no evidence to suggest that the provisions of HC4 have been subject to viability testing for major developments. Extra care and retirement living often need a minimum critical mass to be viable and the Council needs to determine which should be able to support the provision of such accommodation, it also needs to provide much greater clarity on when such housing will be required and to make clear that some housing types may be required on any given site.	Not stated	No	No	<p>'Older People' is defined within the NPPF; therefore, it is not considered necessary to provide a definition within the policy wording. It is also not clear what the purpose of including an age restriction within the policy wording itself would be.</p> <p>The Viability Study confirms Policy HC4 is reflected in the assumed housing mix as part of the viability testing.</p> <p>Policy wording amended to add clarity and confirm the types of homes for older people to be provided will be dependent on-site</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							<p>circumstances.</p> <p><b>Proposed change</b> <b>See Minor Modification 013</b></p> <ul style="list-style-type: none"> <li>• Bungalows</li> <li>• Other age restricted single storey accommodation such as flats and maisonettes</li> <li>• Sheltered/retirement living</li> <li>• Extra care/housing with care and other supported living</li> </ul> <p><b>The category or categories of housing type from the above list that should be provided will be dependent on individual site circumstances.</b></p>
Pegasus Group for Clowes Developments	AGT24-030-02-02	Policy HC4	It is noted that the Plan continues to require 100% of all housing to be M4(2) compliant. This raises an issue of affordability. Whilst the principle is agreed, it is not a requirement of the whole population to have such a provision and delivering this will have an impact on the overall capacity of sites to deliver new homes. The M4(2) standard is optional within Building Regulations, if the Government had intended that evidence of an ageing population alone justifies adoption of optional standards, then such standard would be mandatory. The requirement for 100% M4(2) homes is not considered to be adequately justified, neither is policy HC4.	Not stated	No	No	<p>The Strategic Housing Market Assessment 2022 recommends that based on the evidence of need, a policy requiring all properties to meet Category 2 standards would be the most effective approach. In addition, the 100% requirement has been tested as part of the Viability Study and has been demonstrated to be viable alongside all other policy requirements.</p> <p>No change proposed.</p>
Pegasus Group for Miller Homes	AGT24-030-03-15	Policy HC4	We do not consider that this policy is justified. Part M4(2) is an optional standard. It is for the Council to demonstrate the need for Part M4(2) with PPG providing details on what factors can be considered. It is justified to allow for a level of flexibility within the policy and to do otherwise could have a knock-on impact on housing delivery.	Not stated	No	No	<p>The Strategic Housing Market Assessment 2022 recommends that based on the evidence of need, a policy requiring all properties to meet Category 2 standards would be the most effective approach. In addition, the 100% requirement has been tested as part of the Viability Study and has been demonstrated to be viable alongside all other policy requirements.</p> <p>No change proposed.</p>
Pegasus Group for Persimmon Homes	AGT24-030-04-01	Policy HC4	The policy needs to define 'older people' as it is unclear as to exactly who the policy is targeting or who would be eligible to occupy such dwellings. Extra care and retirement living often need a minimum critical mass to be viable and the Council needs to determine which should be able to support the provision of such accommodation, it also needs to provide much greater clarity on when such housing will be required and to make clear that some housing types may be required on any given site.	Not stated	No	Not stated	<p>'Older People' is defined within the NPPF; therefore, it is not considered necessary to provide a definition within the policy wording.</p> <p>The Viability Study confirms Policy HC4 is reflected in the assumed housing mix as part of the viability testing.</p> <p>Policy wording amended to add clarity and confirm the types of homes for older people to be</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							<p>provided will be dependent on-site circumstances.</p> <p><b>Proposed change</b> <b>See Minor Modification 013</b></p> <ul style="list-style-type: none"> <li>• Bungalows</li> <li>• Other age restricted single storey accommodation such as flats and maisonettes</li> <li>• Sheltered/retirement living</li> <li>• Extra care/housing with care and other supported living</li> </ul> <p><b>The category or categories of housing type from the above list that should be provided will be dependent on individual site circumstances.</b></p>
Pegasus Group for Persimmon Homes	AGT24-030-04-01	Policy HC4	It is noted that the Plan continues to require 100% of all housing to be M4(2) compliant. This raises an issue of affordability. Whilst the principle is agreed, it is not a requirement of the whole population to have such a provision and delivering this will have an impact on the overall capacity of sites to deliver new homes. The M4(2) standard is optional within Building Regulations, if the Government had intended that evidence of an ageing population alone justifies adoption of optional standards, then such standard would be mandatory. The requirement for 100% M4(2) homes is not considered to be adequately justified.	Not stated	No	Not stated	<p>The Strategic Housing Market Assessment 2022 recommends that based on the evidence of need, a policy requiring all properties to meet Category 2 standards would be the most effective approach. In addition, the 100% requirement has been tested as part of the Viability Study and has been demonstrated to be viable alongside all other policy requirements.</p> <p>No change proposed.</p>
Pegasus Group for Taylor Wimpey	AGT24-030-08-02	Policy HC4	The policy needs to define 'older people' as it is unclear as to exactly who the policy is targeting or who would be eligible to occupy such dwellings. Extra care and retirement living often need a minimum critical mass to be viable and the Council needs to determine which should be able to support the provision of such accommodation, it also needs to provide much greater clarity on when such housing will be required and to make clear that some housing types may be required on any given site.	Not stated	No	Not stated	<p>'Older People' is defined within the NPPF; therefore, it is not considered necessary to provide a definition within the policy wording.</p> <p>The Viability Study confirms Policy HC4 is reflected in the assumed housing mix as part of the viability testing.</p> <p>Policy wording amended to add clarity and confirm the types of homes for older people to be provided will be dependent on-site circumstances.</p> <p><b>Proposed change</b> <b>See Minor Modification 013</b></p> <ul style="list-style-type: none"> <li>• Bungalows</li> <li>• Other age restricted single storey accommodation such as flats and maisonettes</li> <li>• Sheltered/retirement living</li> <li>• Extra care/housing with care and other</li> </ul>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							supported living  The category or categories of housing type from the above list that should be provided will be dependent on individual site circumstances.
Pegasus Group for Taylor Wimpey	AGT24-030-08-02	Policy HC4	It is noted that the Plan continues to require 100% of all housing to be M4(2) compliant. This raises an issue of affordability. Whilst the principle is agreed, it is not a requirement of the whole population to have such a provision and delivering this will have an impact on the overall capacity of sites to deliver new homes. The M4(2) standard is optional within Building Regulations, if the Government had intended that evidence of an ageing population alone justifies adoption of optional standards, then such standard would be mandatory. The requirement for 100% M4(2) homes is not considered to be adequately justified.	Not stated	No	Not stated	The Strategic Housing Market Assessment 2022 recommends that based on the evidence of need, a policy requiring all properties to meet Category 2 standards would be the most effective approach. In addition, the 100% requirement has been tested as part of the Viability Study and has been demonstrated to be viable alongside all other policy requirements.  No change proposed.
Home Builders Federation	STA24-024-02	Policy HC4	Policy HC4 is unsound because it is not positively prepared, is not effective or justified, and does not comply with national policy. 46. The policy should not require all development to meet M4(2), however this standard will be superseded by changes to residential Building Regulations. The Government response to 'Raising accessibility standards for new homes' states that the Government proposes to mandate the current M4(2) requirement in Building Regulations as a minimum for all new homes, with M4(1) applying in exceptional circumstances. There is therefore no need for this element of the proposed new policy. 49. The PPG sets out some of the circumstances where it would be unreasonable to require M4(2) compliant dwellings. Such factors include flooding, typography and other circumstances. HBF suggest that flexibility is needed in the application of these standards to reflect site specific characteristics, and the policy wording should reflect this.	No	No	No	The Strategic Housing Market Assessment 2022 recommends that based on the evidence of need, a policy requiring all properties to meet Category 2 standards would be the most effective approach. In addition, the 100% requirement has been tested as part of the Viability Study and has been demonstrated to be viable alongside all other policy requirements.  Whilst the government has expressed an intention to mandate Category 2 standards, this has not been carried out to date. The PPG lists the relevant circumstances where M4(2) may not be possible, therefore it is not considered necessary to repeat these in the policy.  No change proposed.
Brewood Civic Society	STA24-008-07	Policy HC4	Brewood Civic Society supports Policy HC4: Homes for older people and others with special housing requirements.	Not stated	Not stated	Not stated	Comments noted.
The Planning Bureau for MCarthy Stone	AGT24-033-01-02	Policy HC4	Although we are supportive of policies HC4 and HC5 we feel that the policies could be combined so that the plan is clearly written in line with paragraph 16 of the NPPF.	Not stated	Not stated	Not stated	Policy HC4 sets out requirements for major housing development in terms of homes for older and disabled people, whereas Policy HC5 relates solely to individual proposals for specialist housing development. The Council considers maintaining these as two separate policies will provide the greatest clarity.  No change proposed.
Kinver Parish Council	STA24-025-06	Policy HC4	The HNA prepared for the Kinver Neighbourhood Plan points up the increasing need for specialist housing. There is a need for	Not stated	Not stated	Not stated	The Council considers a mixed approach of requiring accessible and adaptable homes as well



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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			housing with additional support and flexibility, providing different tiers and types of care provision, on-site facilities, and transport, to cater for greater dependency. Large brownfield sites away from village boundary locations could meet these specific care needs and provide local employment.				<p>as specific property types (such as bungalows and specialist housing) is the most appropriate, in order to meet immediate needs, and also futureproof the district's housing stock for those reaching older age later in the plan period. This is in line with the PPG.</p> <p>In relation to the location of specialist housing, the PPG states that factors to consider include the proximity of sites to good public transport, local amenities, health services and town centres. The Council therefore considers the criteria contained within Policy HC5 relating to integration and sustainable locations is appropriate and consistent with national guidance.</p> <p>No change proposed.</p>
<b>POLICY HC5: Specialist Housing Schemes</b>							
First City for St Mary's Presbytery and The Archdiocese of Birmingham	AGT24-018-01-07	Policy HC5	Further clarification is required on how policies HC4 and HC5 defer and what is the criteria for when they would be applied to a site and planning application as policy HC4 wording suggests it should be all major development sites whereas HC5 suggests there are a number of criterion to be met before the requirement for specialist housing to be integrated on a site.	Not stated	Not stated	Not stated	<p>Policy HC4 sets out requirements for major housing development in terms of homes for older and disabled people, whereas Policy HC5 relates solely to individual proposals for specialist housing development.</p> <p>No change proposed.</p>
RCA Regeneration for Barberry Developments	AGT24-035-01-02	Policy HC5	We agree with Policy HC4 & HC5 and the need to provide homes for older people and those with special housing requirements.	No	No	No	Comments noted.
RCA Regeneration for Seven Capital	AGT24-035-03-02	Policy HC5	We agree with Policy HC4 & HC5 and the need to provide homes for older people and those with special housing requirements.	Not stated	No	No	Comments noted.
First City Ltd for UKPI Ltd	AGT24-018-02-06	Policy HC5	Further clarification is required on how policies HC4 and HC5 differ and what is the criteria for when they would be applied to a site and planning application as policy HC4 wording suggests it should be all major development sites whereas HC5 suggests there are a number of criterion to be met before the requirement for specialist housing to be integrated on a site.	Not stated	Not stated	Not stated	<p>Policy HC4 sets out requirements for major housing development in terms of homes for older and disabled people, whereas Policy HC5 relates solely to individual proposals for specialist housing development.</p> <p>No change proposed.</p>
Zesta Planning for Completelink Ltd	AGT24-045-01-06	Policy HC5	Whilst we welcome the strong support given by this policy to proposals for the provision of specialist housing, we consider that it does not go far enough given the substantial unmet need for this type of accommodation. The policy requirements for specialist housing proposals to be well integrated with the settlement and situated in a sustainable location is a concern, we struggle to see how the unmet need could be addressed under this policy approach without involving greenfield	Not stated	No	Not stated	In relation to the location of specialist housing, the PPG states that factors to consider include the proximity of sites to good public transport, local amenities, health services and town centres. The Council therefore considers the criteria contained within this policy relating to integration and sustainable locations is appropriate and consistent with national

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			development in the Green Belt. HC5 will only act to preclude opportunities coming forward and do little to address unmet need. The policy is not positively prepared or consistent with national policy and needs to take a more positive and flexible approach to meet the tests of soundness (proposed wording in paragraph 2.76 of full representation).				guidance.  No change proposed.
The Planning Bureau for McCarthy Stone	AGT24-033-01-03	Policy HC5	Although we are supportive of policies HC4 and HC5 we feel that the policies could be combined so that the plan is clearly written in line with paragraph 16 of the NPPF.	Not stated	Not stated	Not stated	Policy HC4 sets out requirements for major housing development in terms of homes for older and disabled people, whereas Policy HC5 relates solely to individual proposals for specialist housing development. The Council considers maintaining these as two separate policies will provide the greatest clarity.  No change proposed.
<b>POLICY HC6: Rural Exception Sites</b>							
West Midlands Housing Association Planning Consortium (Tetlow King)	STA24-050-02	Policy HC6	Policy HC6 seeks to limit rural exception sites to areas adjoining key settlements only. This approach could significantly prevent the housing needs of many rural communities being met and is contradictory to both the PPG and NPPF (2023): "As set out in the National Planning Policy Framework, rural exception sites can come forward in any rural location. In designated rural areas and areas designated as Green Belt, rural exception sites are the only sort of exception sites that can come forward." (Emphasis added) We therefore encourage the Council to allow rural exception sites adjoining any settlement where it can be shown that development would be sustainable. Part b) of Policy HC6 specifies that an affordable housing need must be identified in the parish through a 'robust housing need survey'. The WMHAPC does not agree with the evidence justification to rely solely on a housing needs survey. It is recommended that the Council rewords the policy to instead allow for the best available evidence to justify the need for Rural Exception Sites such as the use of local housing register data, local demographic data, temporary accommodation figures etc. Housing needs surveys can often be inaccurate and challenging to conduct, leading to potential delays in planning applications and in turn resulting in an overall reduction in the delivery of affordable housing. By using a broader range of evidenced bases, justification for Rural Exception schemes can be reflective of actual housing needs.	Not stated	Not stated	Not stated	The Council considers it appropriate for sites to be adjacent to the village development boundary in order to ensure the scheme is integrated with and acts as a natural extension of the existing settlement.  The Council considers a parish need survey to be the most robust, and importantly independent, assessment of local need for this purpose. The survey enables a more in-depth assessment of household circumstances to determine for example those with a local connection that would qualify for the homes on any site that is progressed. Given many rural exception sites brought forward in the district are likely to be on Green Belt land, the Council considers justification of the development through local needs information requires this thorough approach.  No change proposed.
Emery Planning for Wain Estates	AGT24-016-02-01	Policy HC6	The policy sets a maximum cap of 10% on the amount of market housing required for cross-subsidy. There is no justification for this cap. There should be flexibility in relation to the proportion of market housing to be allowed, to deliver affordable housing in areas of significant need.	Not stated	No	No	As set out in the supporting text, a number of rural exception sites have been delivered in the district in the past, none of which have required the provision of market housing for viability purposes. The Council therefore does not envisage any cross subsidy from market housing

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>We note that the current Local Plan policy does not specify an upper limit to market housing. The same is the case with the recent Solihull Local Plan Review. By way of comparison with plans where upper limits have been set, the Cornwall Local Plan: Strategic Policies (Policy 9) includes a rural exception policy with an allowance of up to 50% market housing.</p> <p>Policy HC6 therefore does not meet the soundness test outlined at paragraph 35 b) due to the lack of justification for a maximum cap of 10% on the amount of market housing required for cross-subsidy.</p>				<p>will be required. The PPG is also explicit that a "small amount" of market housing can be delivered to ensure overall viability of the site. Based on this, the 10% cap is considered appropriate to allow for any exceptional site circumstances that could make development of the site more difficult. Local registered providers of affordable housing have been consulted on the plan and have not raised any concerns in relation to this cap.</p> <p>No change proposed.</p>
RCA Regeneration for Barberrry Developments	AGT24-035-01-02	Policy HC6	<p>Policy HC6 is not clear as to how some of the exceptional circumstance criteria would apply. Exception (a) is not clear, as it does not consider a scenario where development is proposed inside the settlement boundary, therefore creating a potential reason for refusal by a policy that seeks to prevent sprawl outside the settlement, and consequently rejects development inside the settlement. This appears contradictory and should clarify its position on proposals inside the settlement.</p> <p>We completely disagree with requirements to involve the Parish Council and a Rural Housing Enabler for a Rural Exception Site; as is clear from recent cases, if the Parish uphold their right to not engage with a developer, the policy cannot be met. It is true that many affordable housing providers also require the endorsement of the parish, which again, would preclude the ability to meet HC6 if a parish choose not to engage with the applicant, effectively holding the process to ransom. Policy HC6 should remove the unnecessary requirement to involve a parish and a Rural Housing Enabler as it is not in accordance with the NPPF or PPG – the parish council and Rural Housing Enabler are not the planning authority and should not be given the role of decision taker.</p>	No	No	No	<p>Comments noted.</p> <p><b>Proposed change</b> <b>See Minor Modification 013</b></p> <p><b>a) The site lies <b>within or</b> immediately adjacent to the development boundary of the settlement</b></p> <p>The PPG encourages local authorities to work in collaboration with local communities, parish councils and other relevant groups to deliver rural exception sites. It is the Council's view that rural exception sites should involve the local community and engagement with the Parish Council is the most appropriate approach for this. The policy does not stipulate that the Parish Council must endorse the scheme. The Council also considers the use of a rural housing enabler essential to ensure any parish need survey is independent and robustly justifies development in an area that would not usually be suitable for housing, especially in the Green Belt.</p> <p>No change proposed.</p>
RCA Regeneration for Seven Capital	AGT24-035-03-02	Policy HC6	<p>Policy HC6 is not clear as to how some of the exceptional circumstance criteria would apply. Exception (a) is not clear, as it does not consider a scenario where development is proposed inside the settlement boundary, therefore creating a potential reason for refusal by a policy that seeks to prevent sprawl outside the settlement, and consequently rejects development inside the settlement. This appears contradictory and should clarify its position on proposals inside the settlement.</p> <p>We completely disagree with requirements to involve the Parish Council and a Rural Housing Enabler for a Rural Exception Site; as is clear from recent cases, if the Parish uphold their right to not engage with a developer, the policy cannot be met. It is true</p>	Not stated	No	No	<p>Comments noted.</p> <p><b>Proposed change</b> <b>See Minor Modification 013</b></p> <p><b>a) The site lies <b>within or</b> immediately adjacent to the development boundary of the settlement</b></p> <p>The PPG encourages local authorities to work in collaboration with local communities, parish councils and other relevant groups to deliver rural exception sites. It is the Council's view that rural exception sites should involve the local</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			that many affordable housing providers also require the endorsement of the parish, which again, would preclude the ability to meet HC6 if a parish choose not to engage with the applicant, effectively holding the process to ransom. Policy HC6 should remove the unnecessary requirement to involve a parish and a Rural Housing Enabler as it is not in accordance with the NPPF or PPG – the parish council and Rural Housing Enabler are not the planning authority and should not be given the role of decision taker.				community and engagement with the Parish Council is the most appropriate approach for this. The policy does not stipulate that the Parish Council must endorse the scheme. The Council also considers the use of a rural housing enabler essential to ensure any parish need survey is independent and robustly justifies development in an area that would not usually be suitable for housing, especially in the Green Belt.  No change proposed.
RCA Regeneration for Richborough Estates	AGT24-035-02-02	Policy HC6	<p>Policy HC6 is not clear as to how some of the exceptional circumstance criteria would apply. Exception (a) is not clear, as it does not consider a scenario where development is proposed inside the settlement boundary, therefore creating a potential reason for refusal by a policy that seeks to prevent sprawl outside the settlement, and consequently rejects development inside the settlement. This appears contradictory and should clarify its position on proposals inside the settlement.</p> <p>We completely disagree with requirements to involve the Parish Council and a Rural Housing Enabler for a Rural Exception Site; as is clear from recent cases, if the Parish uphold their right to not engage with a developer, the policy cannot be met. It is true that many affordable housing providers also require the endorsement of the parish, which again, would preclude the ability to meet HC6 if a parish choose not to engage with the applicant, effectively holding the process to ransom. Policy HC6 should remove the unnecessary requirement to involve a parish and a Rural Housing Enabler as it is not in accordance with the NPPF or PPG – the parish council and Rural Housing Enabler are not the planning authority and should not be given the role of decision taker.</p>	Not stated	No	No	<p>Comments noted.</p> <p><b>Proposed change</b> <b>See Minor Modification 014</b></p> <p><b>a) The site lies <b>within or</b> immediately adjacent to the development boundary of the settlement</b></p> <p>The PPG encourages local authorities to work in collaboration with local communities, parish councils and other relevant groups to deliver rural exception sites. It is the Council’s view that rural exception sites should involve the local community and engagement with the Parish Council is the most appropriate approach for this. The policy does not stipulate that the Parish Council must endorse the scheme. The Council also considers the use of a rural housing enabler essential to ensure any parish need survey is independent and robustly justifies development in an area that would not usually be suitable for housing, especially in the Green Belt.</p> <p>No change proposed.</p>
JMS Planning for Wolverhampton Halfpenny Green Airport	AGT24-023-01-01	Policy HC6	MS Planning supports this policy but suggests an alteration of part a) from ‘The site lies immediately adjacent to the development boundary of the settlement’ to ‘The site lies adjacent to existing built development’. This will enable affordable housing need in areas removed from larger settlements to come forward, where other sustainability criteria are met. It is noted that Tier 4 villages (2021 Rural Services and Facilities Audit) such as nearby Bobbington have a high affordability ratio (e.g. 11.41) compared to the West Midlands average of 8.66 (April 2023). Given that ‘South Staffordshire is a predominantly rural district, it would be remiss to restrict affordable housing to immediately adjacent to settlement boundaries as long as other sustainability criteria an be met. The edit to this policy would give the LPA flexibility	Not stated	Not stated	Not stated	<p>The Council considers it appropriate for sites to be adjacent to the village development boundary in order to ensure the scheme is integrated with and acts as a natural extension of the existing settlement. Allowing extensions to any existing built development could lead to development in unsustainable and isolated allocations.</p> <p>No change proposed.</p>

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			to respond to increasing affordable housing need.				
<b>POLICY HC7: First Homes Exception Sites</b>							
West Midlands Housing Association Planning Consortium (Tetlow King)	STA24-050-02	Policy HC7	The WMHAPC supports the Council's decision to include a First Homes Exceptions sites policy. It is noted that the Council will consider a local eligibility criteria to be implemented for the delivery of First Homes and such criteria will be detailed within a forthcoming affordable housing SPD.	Not stated	Not stated	Not stated	Comments noted.
Acres Land and Planning for Hallam Land Management	AGT24-001-01-01	Policy HC7	We welcome the Council's introduction of First Homes Exceptions sites which could bring a welcome addition of lower cost housing to first time buyers. However, this policy appears to be unchanged since the 2022 version of the plan and is so restrictive that few sites would ever get off the ground. Specifically the requirement that sites must lie outside the green belt.	Not stated	No	Not stated	The PPG confirms that First Homes exception sites are not permitted in the green belt. The policy is therefore consistent with national guidance.  No change proposed.
Emery Planning for Wain Estates	AGT24-016-02-01	Policy HC7	The requirement within the policy for there to be "an evidenced need for First Homes exists within the district which is not already being met within the local authority area" is unduly restrictive and is not consistent with national policy.  There is then no meaningful analysis to demonstrate that the need for such accommodation will be satisfied purely through the application of Policy HC3. First homes exception sites are not intended to be village or parish specific. Therefore, the suggestion would be that the applicant needs to undertake a district-wide analysis of need and supply. That would be an impossible task given that the Council's own evidence to the Local Plan is inconclusive on the issue.  We also object to the proposed maximum cap of 10% on the amount of market housing required for cross-subsidy.	Not stated	No	No	The 2021 Written Ministerial Statement relating to First Homes confirms that local authorities should support First Homes exception sites, unless the need for such homes is already being met within the local authority's area. The policy wording is consistent with this statement.  The PPG states that a small proportion of market housing can be provided on such sites and local authorities can set out what proportion of market housing would be acceptable. The Council considers a 10% cap to be reflective of the PPG wording.  No change proposed.
RCA Regeneration for Barberry Developments	AGT24-035-01-02	Policy HC7	We agree with Policy HC7 and the need to make exceptional provision for First Homes across South Staffordshire.	No	No	No	Comments noted.
RCA Regeneration for Seven Capital	AGT24-035-03-02	Policy HC7	We agree with Policy HC7 and the need to make exceptional provision for First Homes across South Staffordshire.	Not stated	No	No	Comments noted.
RCA Regeneration for Richborough Estates	AGT24-035-02-02	Policy HC7	We agree with Policy HC7 and the need to make exceptional provision for First Homes across South Staffordshire.	Not stated	No	No	Comments noted.
<b>POLICY HC8: Self &amp; Custom Build Housing</b>							
PlanIT Planning & Development for Hampton Oak Developments	AGT24-032-02-07	Policy HC8	The policy should be revised. The first paragraph in the policy should be retained and the remaining sections should be deleted. The policy is a sledgehammer to crack a very small nut as the	Yes	No	Yes	In line with the NPPF and PPG, the council is taking a positive approach to this form of housing in order to provide a range of housing options for residents and ensure sufficient plots are



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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			need can be addressed through windfall sites. There is unlikely to be a take-up of self-build plots on large housing estates.				provided. Whilst the need for plots is relatively modest at present, the policy is future proofed to allow for delivery of plots on major development should this be needed. The Council considers the policy is sufficiently flexible to allow for this, alongside the allowance for the plot to be built out as a standard property type if after 12 months' marketing the plot is unsold.  No change proposed.
First City for St Mary's Presbytery and The Archdiocese of Birmingham	AGT24-018-01-08	Policy HC8	Currently, there is little information available in connection to what will be included in the self-build register (number of sites required, size of property preferred, location etc for example) to know how it could potentially impact proposed sites. Whilst we generally support the concept of self-build/custom housing, we do not consider providing them as part of a larger housing development is always the most appropriate solution because self/custom builders are more likely to want a more bespoke location/setting. Smaller dedicated self/custom sites are therefore a more appropriate answer. We support the position that should a proposed custom self-build plot not be sold after 12 months following active marketing, then the developer will be permitted to build out the plan as a standard property type.	Not stated	Not stated	Not stated	The policy reflects guidance in the PPG which suggests authorities consider how local planning policies may address requirements for self and custom housebuilding, including for example, as a number of units required as part of certain allocated sites.  The policy is sufficiently flexible to respond to changes in the need for self/custom build over the plan period.  No change proposed.
Avison Young for Crest Nicholson	AGT24-004-02-03	Policy HC8	It may be appropriate for a policy to encourage self and custom-build development on housing sites. However, it is not considered appropriate to require major developments to provide for self-builders. This element of the policy is unsound and should be deleted.	Yes	No	Not stated	The policy reflects guidance in the PPG which suggests authorities consider how local planning policies may address requirements for self and custom housebuilding, including for example, as a number of units required as part of certain allocated sites.  The policy is sufficiently flexible to respond to changes in the need for self/custom build over the plan period.  No change proposed.
Acres Land and Planning for Hallam Land Management	AGT24-001-01-01	Policy HC8	The second paragraph which expects 'Major developments to have regard to the need on the Council's self-build register' is a somewhat vague and unhelpful expectation. The prospect of developers and housebuilders possibly having to engage in complex land transactions, agreements and Section 106 obligations for a single or very small numbers of self-build plots would be onerous and time-consuming for small builders.	Not stated	No	Not stated	Whilst the need for plots is relatively modest at present, the policy is future proofed to allow for delivery of plots on major development should this be needed. The Council considers the policy is sufficiently flexible to allow for this, alongside the allowance for the plot to be built out as a standard property type if after 12 months' marketing the plot is unsold.  No change proposed.
Pegasus Group for BDW Trading Ltd	AGT24-030-01-	Policy HC8	We do not consider that this part of the policy is justified. The need for self and custom build plots is relatively low. The blanket	Not stated	No	Not stated	Whilst the need for plots is relatively modest at present, the policy is future proofed to allow for

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
	11		approach of the policy, which is not necessary owing to the low demand, is likely to frustrate the delivery of regular housing particularly for volume housebuilders whose approach may not always be compatible with self-building.				delivery of plots on major development should this be needed. The Council considers the policy is sufficiently flexible to allow for this, alongside the allowance for the plot to be built out as a standard property type if after 12 months' marketing the plot is unsold.  No change proposed.
Evolve Planning & Design for Lovell Homes	AGT24-017-05-01	Policy HC8	The 2022 SHMA identifies 30 applicants on the self-build register as of Spring 2022, noting that 10 of these applicants are also on a register within another LPA. This demonstrates a very low level of demand. Lovell Homes considers HC8 provides a justified and proportionate approach to meeting this specific need, which requires the consideration of the Council's Self Build Register on major developments but falls short of requiring a specific percentage of provision.	Not stated	Not stated	Not stated	Comments noted.
Evolve Planning & Design for Keon Homes	AGT24-017-04-01	Policy HC8	The 2022 SHMA identifies 30 applicants on the self-build register as of Spring 2022, noting that 10 of these applicants are also on a register within another LPA. This demonstrates a very low level of demand. Keon Homes considers HC8 provides a justified and proportionate approach to meeting this specific need, which requires the consideration of the Council's Self Build Register on major developments but falls short of requiring a specific percentage of provision.	Not stated	Not stated	Not stated	Comments noted.
Evolve Planning & Design for Four Ashes Road Ltd	AGT24-017-03-01	Policy HC8	The 2022 SHMA identifies 30 applicants on the self-build register as of Spring 2022, noting that 10 of these applicants are also on a register within another LPA. This demonstrates a very low level of demand. Four Ashes Road Ltd considers HC8 provides a justified and proportionate approach to meeting this specific need, which requires the consideration of the Council's Self Build Register on major developments but falls short of requiring a specific percentage of provision.	Not stated	Not stated	Not stated	Comments noted.
Evolve Planning & Design for Cameron Homes	AGT24-017-02-01	Policy HC8	The 2022 SHMA identifies 30 applicants on the self-build register as of Spring 2022, noting that 10 of these applicants are also on a register within another LPA. This demonstrates a very low level of demand. Cameron Homes considers HC8 provides a justified and proportionate approach to meeting this specific need, which requires the consideration of the Council's Self Build Register on major developments but falls short of requiring a specific percentage of provision.	Not stated	Not stated	Not stated	Comments noted.
Evolve Planning & Design for Bloor Homes	AGT24-017-01-09	Policy HC8	Land east of Bilbrook - The 2022 SHMA identifies 30 applicants on the self-build register as of Spring 2022, noting that 10 of these applicants are also on a register within another LPA. This demonstrates a very low level of demand. Bloor Homes considers HC8 provides a justified and proportionate approach to meeting this specific need, which requires the consideration of the Council's Self Build Register on major developments but falls	Not stated	Not stated	Not stated	Comments noted.

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			short of requiring a specific percentage of provision.				
Harris Lamb for Redrow Homes	AGT24-022-03-10	Policy HC8	RH are unclear as to the evidence of the need for self-build plots and do not consider that this has been adequately demonstrated. The self-build list is not readily accessible on the Council's website so we cannot see what the current level of demand is for self-build plots. Evidence of the need for self-build plots needs to be demonstrated in order to justify the requirement to provide them within new major development.	Yes	No	Not stated	Information on the Council's self-build register is provided within the Housing Market Assessment and Authority Monitoring Report. It is also published online by MHCLG, alongside data for all local authorities.  The council considers the proposed approach proportionate to the level of need and flexible enough to allow for any changes to this over the plan period.  No change proposed.
Harris Lamb for Redrow Homes	AGT24-022-03-10	Policy HC8	Any self-build plots may then require a design code to be agreed with the applicant and implemented by the developer of the plots. The agreement of a design code in our view would undermine the attractiveness of self-build plots if a prospective purchaser had to abide by a design code that they had no input into preparing.	Yes	No	Not stated	The Council considers it important to ensure self and custom build properties successfully integrate with surrounding properties as part of the main housing development. A design code may therefore be considered necessary to achieve this. A code does not however have to be overly prescriptive to prevent the design of individual properties from meeting the intended occupier's specific needs.  No change proposed.
Harris Lamb for Redrow Homes	AGT24-022-03-10	Policy HC8	RH welcome the requirement to actively market self-build plots and that if these are not taken up, they can revert back to standard market dwellings to be developed by the developer. RH consider that a period of between 6 to 12 months of marketing would be appropriate. Furthermore, RH contend that the marketing of the plots should run concurrently with the start of the development. This is on the basis that if the plots are not taken up they can revert back to the developer and be completed as part of the wider development. If this were not the case the likelihood is that the plots would go undeveloped and would reduce the supply of housing as a result. To address our concerns, we would wish to seek the deletion of the requirement for the design code to be removed from the policy. Furthermore, we seek the period of marketing to run for a period of 6 – 12 months and for the policy to clarify that this will commence at the same time as the commencement of the development.	Yes	No	Not stated	The Council considers 12 months from the issue of planning permission to be a reasonable timescale for allowing sufficient opportunity for the plot to be provided as a self/custom build property.  No change proposed.
Savills UK Ltd for Clowes Developments	AGT24-037-02-06	Policy HC8	Clowes supports HC8 as the approach is flexible.	Yes	No	Yes	Comments noted.
First City Ltd for UKPI Ltd	AGT24-018-02-07	Policy HC8	Consideration needs to be given to the implications of the self-building and custom housebuilding policy on sites in conjunction with other policies set out within the Local Plan.	Not stated	Not stated	Not stated	Information on the Council's self-build register is provided within the Housing Market Assessment and Authority Monitoring Report. It is also

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**CHAPTER 7 & POLICIES HC1-HC9: DELIVERING THE RIGHT HOMES**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>Currently, there is little information available in connection to what will be included in the self-build register (number of sites required, size of property preferred, location etc for example) to know how it could potentially impact proposed sites.</p> <p>Paragraph 7.20 states there are only 36 entries on the Council's self-build and custom house build register. If there are multiple sites available in one area, it would be important to understand how the need would apportion over multiple sites and how the self-build register housing numbers apply to allocated sites in comparison to windfall sites not currently identified and planned for in the Local Plan. We consider it would be unfair for the self-build requirement to fall solely on the proposed allocations.</p> <p>Whilst we generally supports the concept of self-build/custom housing, we do not consider providing them as part of a larger housing development is the most appropriate solution because self/custom builders are more likely to want a more bespoke location/setting. Smaller dedicated self/custom sites are therefore a more appropriate answer.</p> <p>We support the position that should a proposed custom self-build plot not be sold after 12 months following active marketing, then the developer will be permitted to build out the plan as a standard property type.</p>				<p>published online by MHCLG, alongside data for all local authorities.</p> <p>The council considers the proposed approach proportionate to the level of need and flexible enough to allow for any changes to this over the plan period.</p> <p>The policy reflects guidance in the PPG which suggests authorities consider how local planning policies may address requirements for self and custom housebuilding, including for example, as a number of units required as part of certain allocated sites.</p> <p>No change proposed.</p>
Marrons Planning for L&Q Estates	AGT24-027-03-01	Policy HC8	<p>The policy is ambiguous and does not provide sufficient clarity with regard to the expectation of an applicant for a major development proposal, particularly given the Council does not publish its Self-Build and Custom Housebuilding Register or any data relating to it publicly. Further, it is considered the Council's Self-Build and Custom Housebuilding Register couldn't be relied upon as clear evidence to support such a policy intervention in any case given the ability for an individual to enter their details on to multiple Registers, skewing the data derived, when that individual may have no means or desire to carry out such a project in reality in any case. In addition, the delivery of self-build and custom build plots on larger residential schemes are unlikely to be desirable to those on the Councils' Self-Build and Custom Housebuilding Register given the majority of self-builders and custom builders tend to seek standalone plots in the open countryside. It is also considered that the requirement for developers to actively market plots at a reasonable price for a minimum period of 12 months as set out in the third paragraph of draft Policy HC8 is unreasonable.</p>	Yes	No	Yes	<p>Information on the Council's self-build register is provided within the Housing Market Assessment and Authority Monitoring Report. It is also published online by MHCLG, alongside data for all local authorities.</p> <p>The policy addresses the PPG requirement for local authorities to have regard to the register when carrying out their planning functions.</p> <p>The policy reflects guidance in the PPG which suggests authorities consider how local planning policies may address requirements for self and custom housebuilding, including for example, as a number of units required as part of certain allocated sites.</p> <p>The Council considers 12 months from the issue of planning permission to be a reasonable timescale for allowing sufficient opportunity for the plot to be provided as a self/custom build property.</p> <p>No change proposed.</p>
Pegasus Group for Richborough Estates	AGT24-030-05-02	Policy HC8	<p>The policy should be clear that in having regard to the Council's self-build register, it is only Part 1 of the register which needs to be considered. The policy should also recognise that delivery of</p>	Yes	No	Yes	<p>The Council does not consider it appropriate to reference specific parts of the register, in case the Council's additional eligibility tests are</p>

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**CHAPTER 7 & POLICIES HC1-HC9: DELIVERING THE RIGHT HOMES**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			self-build housing on new residential sites successfully occurs when there is a distinct phasing or grouping of plots secured for such delivery. Whilst Richborough generally supports the concept of self-build housing, they do not consider providing them as part of a larger housing development is the most appropriate solution.				removed at any point in the future. Reference to phasing is also not required in the policy wording.  The policy reflects guidance in the PPG which suggests authorities consider how local planning policies may address requirements for self and custom housebuilding, including for example, as a number of units required as part of certain allocated sites.  No change proposed.
Pegasus Group for Clowes Developments	AGT24-030-02-02	Policy HC8	The policy should be clear that in having regard to the Council's self-build register, it is only Part 1 of the register which needs to be considered. The policy should also recognise that delivery of self-build housing on new residential sites successfully occurs when there is a distinct phasing or grouping of plots secured for such delivery. Whilst Clowes generally supports the concept of self-build housing, they do not consider providing them as part of a larger housing development is the most appropriate solution.	Not stated	No	No	The Council does not consider it appropriate to reference specific parts of the register, in case the Council's additional eligibility tests are removed at any point in the future. Reference to phasing is also not required in the policy wording.  The policy reflects guidance in the PPG which suggests authorities consider how local planning policies may address requirements for self and custom housebuilding, including for example, as a number of units required as part of certain allocated sites.  No change proposed.
Pegasus Group for Miller Homes	AGT24-030-03-15	Policy HC8	We do not consider that this policy is justified. The need for custom and self-build plots is relatively low. The blanket approach of this policy is likely to frustrate the delivery of regular housing particularly for volume housebuilders. This part of the policy should be removed and the Council consider alternative approaches.	Not stated	No	No	The council considers the proposed approach proportionate to the level of need and flexible enough to allow for any changes to this over the plan period.  No change proposed.
Pegasus Group for Persimmon Homes	AGT24-030-04-01	Policy HC8	The policy should be clear that in having regard to the Council's self-build register, it is only Part 1 of the register which needs to be considered. The policy should also recognise that delivery of self-build housing on new residential sites successfully occurs when there is a distinct phasing or grouping of plots secured for such delivery. Persimmon Homes supports the position that should a proposed custom self-build not be sold after 12 months following marketing, then the developer will be permitted to building out the plan as a standard property type. The policy is considered unsound as it is neither justified nor consistent with national policy.	Not stated	No	Not stated	The Council does not consider it appropriate to reference specific parts of the register, in case the Council's additional eligibility tests are removed at any point in the future. Reference to phasing is also not required in the policy wording.  The policy addresses the PPG requirement for local authorities to have regard to the register when carrying out their planning functions. The proposed approach is considered proportionate to the level of need and flexible enough to allow for any changes to this over the plan period.  No change proposed.
Pegasus Group for Taylor Wimpey	AGT24-030-08-02	Policy HC8	The policy should be clear that in having regard to the Council's self-build register, it is only Part 1 of the register which needs to be considered. The policy should also recognise that delivery of	Not stated	No	Not stated	The Council does not consider it appropriate to reference specific parts of the register, in case the Council's additional eligibility tests are



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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			self-build housing on new residential sites successfully occurs when there is a distinct phasing or grouping of plots secured for such delivery. Whilst Taylor Wimpey generally supports the concept of self-build housing, they do not consider providing them as part of a larger housing development is the most appropriate solution. Taylor Wimpey supports the position that should a proposed custom self-build not be sold after 12 months following marketing, then the developer will be permitted to building out the plan as a standard property type.				removed at any point in the future. Reference to phasing is also not required in the policy wording.  The policy addresses the PPG requirement for local authorities to have regard to the register when carrying out their planning functions. The proposed approach is considered proportionate to the level of need and flexible enough to allow for any changes to this over the plan period.  No change proposed.
PlanIT Planning & Development for Miller Homes	AGT24-032-04-07	Policy HC8	HC8 is problematic and we have concerns for the following reasons – The latest Authority Monitoring Report states there are 32 individual entries on the SCB Register. There were an additional 2 entries over 12 months to 2023. Over that period the Council granted planning permission for 5 SCB plots which was sufficient to meet its regulatory requirement over a rolling 3-year period. The level of need can be easily addressed on suitable windfall sites. There is unlikely to be a take-up of self-build plots on large housing estates. Those plots are unlikely to appeal to those on the self-build register whose requirements are for larger, individual plots. The better approach to meet the scale of the identified need is to provide support for such applications from windfall opportunities.	Yes	No	Yes	In line with the NPPF and PPG, the council is taking a positive approach to this form of housing in order to provide a range of housing options for residents and ensure sufficient plots are provided. Whilst the need for plots is relatively modest at present, the policy is future proofed to allow for delivery of plots on major development should this be needed. The Council considers the policy is sufficiently flexible to allow for this, alongside the allowance for the plot to be built out as a standard property type if after 12 months' marketing the plot is unsold.  The policy reflects guidance in the PPG which suggests authorities consider how local planning policies may address requirements for self and custom housebuilding, including for example, as a number of units required as part of certain allocated sites.  No change proposed.
Home Builders Federation	STA24-024-02	Policy HC8	Policy HC8 is unsound because it is not effective or justified, and does not comply with national policy. 50. HBF advocates for self and custom-build policies that encourage self and custom-build development by setting out where it will be supported in principle. HBF considers that Councils can play a key role in facilitating the provision of land as set in the PPG. This could be done, for example, by using the Councils' own land for such purposes and/or allocating sites specifically for self and custom-build home builders- although this would need to be done through discussion and negotiation with landowners. It is considered unlikely that the provision of self and custom build plots on new housing developments can be co-ordinated with the development of the wider site. HBF also question is there is a mismatch between the kind of plots and locations that self-builders are looking for, and the kind of plots that would result from this policy.	No	No	No	The policy reflects guidance in the PPG which suggests authorities consider how local planning policies may address requirements for self and custom housebuilding, including for example, as a number of units required as part of certain allocated sites.  The Council considers 12 months from the issue of planning permission to be a reasonable timescale for allowing sufficient opportunity for the plot to be provided as a self/custom build property.  No change proposed.

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**CHAPTER 7 & POLICIES HC1-HC9: DELIVERING THE RIGHT HOMES**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			52. It is important that plots should not be left empty to the detriment of neighbouring properties or the whole development. The timescale for reversion of these plots to the original housebuilder should be as short as possible from the commencement of development. HBF suggest this should be a maximum of six months.				
Sutton, M	RES24-226-05	Policy HC8	Support this policy but ask that the Council ensure that the public are aware and they work proactively with developers to ensure plots are made available.	Not stated	Not stated	Not stated	Comments noted.
<b>POLICY HC9: Gypsy, Traveller and Travelling Showpeople</b>							
							No representations made.

**CHAPTER 8 & POLICIES HC10-HC13: DESIGN AND SPACE STANDARDS**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
<b>GENERAL ISSUES: CHAPTER 8 (inc specific paras references)</b>							
Watt, J	RES24-246-06	8.4	Any new buildings would impact on local residents around site 036c – land south of Stafford by restricting views, extra noise and general lack of privacy.  Site 036c should remain as agricultural land.	No	No	No	The justification for proposing site 036c is set out in the Housing Site Assessment Topic Paper 2024.  Site specific details such as views / privacy will be assessed under any forthcoming planning application.
Lloyd, K	RES24-136-10	8.10	It is important that the plan responds positively to shape the way parking is accommodated in new development. The NPPF seeks to encourage a reduction in car usage by promoting sustainable transport choices. Having 4 roads exits for cars for the Bilbrook site contradicts and undermines the spirit of the NPPF and will not encourage alternative uses to the car.	No	No	No	The council has included a sustainable transport policy (Policy EC12) that is considered to sufficient to address sustainable transport matters on a scheme-by-scheme basis. It will ensure that all development (including proposed allocations) maximises opportunities for walking, cycling, and public transport usage, and deliver expanded provision to meet increased cumulative demand for bus and rail services and connections.  However, site access and egress for vehicles must be safe and therefore engagement throughout plan preparation has taken place with Local Highways Authority (Staffordshire County Council).
<b>POLICY HC10: DESIGN REQUIREMENTS</b>							
Staffordshire Police	STA24-045-01	Policy HC10	Any footpaths and cycle routes should be carefully designed, ensuring safety is incorporated into the design: wide paths; natural surveillance; lighting if appropriate; landscaping schemes, ensuring the matured landscape will not block out the natural daylight, low lying shrubs are planted adjacent to the paths, thereby eliminating places to hide, raising the crown of trees; and allow a clear line of sight along the paths. Provide a safe environment with appropriate lighting and clear direct routes to public transport. Parking facilities should be developed to Park Mark standards, to ensure a safe and secure environment. Lorry parks should be designed to Park Mark Freight standards, as it has been proven these facilities experience less crime. Development of venues and shopping complexes should meet the standards proposed by Martyn's law.	Not stated	Not stated	Not stated	Comments noted.  Parking provision details are provided in Appendix H of the Local Plan. It is expected that parking facilities will be provided in accordance with these details. Park Mark standards relate to car parks, rather than for residential developments or commercial schemes.  Any large-scale parking facilities that are proposed will likely be subject to consultation with the police, who will be able to provide detailed comments on the scheme.  No changes proposed.
NHS Property Services	STA24-034-01	Policy HC10	NHSPS supports the inclusion of policies which recognise the impact of well-designed places on well-being but would also recommend the recognition of the role of planning in delivering and addressing health outcomes. The planning system is critical not only to the provision of improved health services and infrastructure by enabling health providers to meet changing	Not stated	Not stated	Not stated	Comments noted.  It is considered that Policy HC10 ensures development proposals are well-designed and will function as attractive places which have a positive impact on well-being.

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>healthcare needs.</p> <p>We recommend the inclusion of the specific policy requirements of both health and well-being in the Local Plan - Proposals should consider local health outcomes and, where appropriate, include a Health Impact Assessment Design schemes should encourage active travel, including providing safe and attractive walking and cycling routes, and ensure developments are connected to local services, employment, leisure and existing routes Provide access to healthy foods, including through food growing opportunities (allotments and/or sufficient garden space) Encourage social interaction, including providing front gardens, informal meeting spaces and neighbourhood squares Schemes should be resilient and adaptable to climate change, including SUDs, rainwater collection and efficient design. Consider impacts of pollution and microclimates. Provide high quality green and blue spaces.</p>				No changes proposed.
First City for St Mary's Presbytery and The Archdiocese of Birmingham	AGT24-018-01-09	HC10	The introduction of a new set of requirements to ensure high quality design and the creation of beautiful places in line with Government guidance is supported. However, again we do not consider the policy should be overly prescriptive to the extent where it is restrictive and prevents each scheme having individual flair and taking into consider the local characteristics.	Not stated	Not stated	Not stated	<p>Comments noted.</p> <p>No changes proposed.</p>
Avison Young for Crest Nicholson	AGT24-004-02-03	Policy HC10	The proposed wording of this policy appears to seek to give the guidance in the South Staffordshire Design Guide SPD and other guidance documents the same weight as Development Plan Policy. This is clearly inappropriate as the NPPF confirms that whilst supplementary planning documents are capable of being a material consideration in planning decisions, they "are not part of the development plan". The wording of HC10 should be amended accordingly.	Yes	No	Not stated	<p>The wording of the policy suggests that design should reflect the SPD, rather than they must be adhered to in all cases. It is not increasing the weight of the SPD but is signposting that it should be considered by applicants in working up scheme design.</p> <p>No change proposed.</p>
Acres Land and Planning for Hallam Land Management	AGT24-001-01-01	Policy HC10	<p>Object to requirement for using bespoke house types to avoid a monotonous appearance. This policy needs to be tempered to reflect the real world of house-building.</p> <p>Object to requirement for well design buildings to reflect local vernacular, including historical typologies where appropriate. This policy needs to be tempered to reflect the variety of architectural options which are open to developers and individuals in building a home.</p>	Not stated	No	Not stated	<p><b>Minor modification 017 - Amend point 'e' to:</b></p> <p><b>'Ensures attractive and distinctive development with use of a variety of materials that will remain attractive through the lifetime of the development. Developments should make use of distinctive buildings and detailing to avoid a monotonous visual appearance, aid orientation and navigation as well as helping to create local character and familiarity'.</b></p> <p>It is considered that the requirement for new</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							buildings to reflect local vernacular is appropriate, especially given the rural character of South Staffordshire. Development proposals wishing to promote alternative architectural options will be fully assessed at pre-application and planning application stage.
Historic England	STA24-023-01	Policy HC10	A link should be made to evidence base documents relating to historic townscape and landscape character, as this would assist prospective applicants in understanding local character.	Not stated	Not stated	Not stated	Links to supplementary planning documents are not included within the Plan as when these documents are updated, the links contained in the Plan may no longer be correct. All supplementary planning documents will be available on the website.  No changes proposed.
Pegasus Group for BDW Trading Ltd	AGT24-030-01-11	Policy HC10	The documents referenced under Criteria a) are material considerations and should, if necessary, be listed as key documents beneath the policy rather than in the policy itself since their content are not being scrutinised as part of this Local Plan process. Under Criteria c) and the requirement to incorporate tree lined streets, an element of flexibility needs to be drafted into the wording of the policy to reflect national policy and take account of the fact that there may be specific cases why this would be inappropriate. Criteria I should be removed as it is unnecessary duplication with Policy HC1.	Not stated	No	Not stated	Comments noted.  The wording of the policy suggests that design should reflect the SPD, rather than they must be adhered to in all cases. It is not increasing the weight of the SPD but is signposting that it should be considered by applicants in working up scheme design.  The provision of tree lined streets will be subject to County Highways agreement and will be maintained by County Highways.  Whilst the type and tenure of house types is set out in detail in Policy HC1, Policy HC10 provides a holistic overview of the design requirements for development proposals and is therefore considered necessary within the policy.
RCA Regeneration for Barberry Developments	AGT24-035-01-02	Policy HC10	We agree with Policies HC10, HC11, HC12 & HC13, and the need to design visually attractive homes with high quality residential amenity, adequate internal space and correct parking provision	No	No	No	Comments noted.  No changes proposed.
RCA Regeneration for Seven Capital	AGT24-035-03-02	Policy HC10	We agree with Policies HC10, HC11, HC12 & HC13, and the need to design visually attractive homes with high quality residential amenity, adequate internal space and correct parking provision	Not stated	No	No	Comments noted.  No changes proposed.
Evolve Planning & Design for Lovell Homes	AGT24-017-05-01	Policy HC10	Lovell Homes supports the introduction of a new set of requirements to ensure high quality design and the creation of beautiful places in line with Government guidance.	Not stated	Not stated	Not stated	Comments noted.  No changes proposed.
Evolve Planning & Design for Keon Homes	AGT24-017-04-01	Policy HC10	Keon Homes supports the introduction of a new set of requirements to ensure high quality design and the creation of beautiful places in line with Government guidance.	Not stated	Not stated	Not stated	Comments noted.  No changes proposed.



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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
Evolve Planning & Design for Four Ashes Road Ltd	AGT24-017-03-01	Policy HC10	Four Ashes Road Ltd supports the introduction of a new set of requirements to ensure high quality design and the creation of beautiful places in line with Government guidance.	Not stated	Not stated	Not stated	Comments noted. No changes proposed.
Evolve Planning & Design for Cameron Homes	AGT24-017-02-01	Policy HC10	Cameron Homes supports the introduction of a new set of requirements to ensure high quality design and the creation of beautiful places in line with Government guidance.	Not stated	Not stated	Not stated	Comments noted. No changes proposed.
Evolve Planning & Design for Bloor Homes	AGT24-017-01-09	Policy HC10	Land East of Bilbrook - Bloor Homes supports the introduction of a new set of requirements to ensure high quality design and the creation of beautiful places in line with Government guidance.	Not stated	Not stated	Not stated	Comments noted. No changes proposed.
First City Ltd for UKPI Ltd	AGT24-018-02-08	Policy HC10	The introduction of a new set of requirements to ensure high quality design and the creation of beautiful places in line with Government guidance is supported. However, again we do not consider the policy should be overly prescriptive to the extent where it is restrictive and prevents each scheme having individual flair and taking into consider the local characteristics.	Not stated	Not stated	Not stated	Comments noted. No changes proposed.
National Grid Electricity Transmission (Avison Young)	STA24-031-01	Policy HC10	Amend design requirements to ensure consistency with national policy, suggest inclusion: 'take a comprehensive and co-ordinated approach to development including respecting existing site constraints, including utilities situated within sites.	Not stated	Not stated	Not stated	<b>Minor modification 018:</b> <b>t) take a comprehensive and co-ordinated approach to development including respecting existing site constraints, including utilities situated within sites</b>
National Gas Transmission (Avison Young)	STA24-029-01	Policy HC10	Amend design requirements to ensure consistency with national policy, suggest inclusion: 'take a comprehensive and co-ordinated approach to development including respecting existing site constraints, including utilities situated within sites.	Not stated	Not stated	Not stated	<b>Minor modification 018:</b> <b>t) take a comprehensive and co-ordinated approach to development including respecting existing site constraints, including utilities situated within sites</b>
Lloyd, K	RES24-136-08	Policy HC10	How will point c be achieved? My experience of tree planting on new estates, eg Penkrige, is that these trees are planted in front gardens where they either die, or are removed by home owners. What will you be doing to preserve these trees and prevent them from being removed or dying? Point p: "Accommodates car and cycle parking" – The bicycle accommodation must be secure and covered to encourage bicycle use. I suggest the installation of units similar to the ones in my attached picture.	Not stated	Not stated	Not stated	Criteria C of HC10 relates to tree lined streets, rather than planting the trees in front gardens. This will be subject to County Highway agreement and maintenance.  Cycle parking incorporated into a development will be secure and covered.
Marrons Planning for Boningale Homes	AGT24-027-02-01	Policy HC10	Whilst the pursuit of high quality design is applauded and understandable, it is essential that the Council avoid overly prescriptive and detailed design policies being included in the Local Plan The Council will need to consider this, alongside any viability implications of the requirements set under this policy.	Not stated	No	Not stated	Comments noted. No change proposed.
Pegasus Group for Richborough	AGT24-030-05-	Policy HC10	The introduction of a detailed design policy to ensure high	Yes	No	Yes	Comments noted.

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
Estates	02		quality design and the creation of beautiful places is supported. However, the provision of tree lined streets should be subject to highway authority agreement. The point on house types and tenures is repetition of policy material set out in HC1. The provision of bespoke house types is onerous and unrealistic for commercial housebuilders who work with a portfolio of house types, the reference to 'bespoke homes' is unjustified and should be amended to refer to a 'range of house types'. The policy is currently unsound.				<p>The provision of tree lined streets will be subject to County Highways agreement and will be maintained by County Highways.</p> <p>Whilst the type and tenure of house types is set out in detail in Policy HC1, Policy HC10 provides a holistic overview of the design requirements for development proposals and is therefore considered necessary within the policy.</p> <p><b>Minor modification 017 – Amend point 'e' to:</b></p> <p><b>'Ensures attractive and distinctive development with use of a variety of materials that will remain attractive through the lifetime of the development. Developments should make use of distinctive buildings and detailing to avoid a monotonous visual appearance, aid orientation and navigation as well as helping to create local character and familiarity'.</b></p>
Pegasus Group for Clowes Developments	AGT24-030-02-02	Policy HC10	The introduction of a detailed design policy to ensure high quality design and the creation of beautiful places is supported. However, the provision of tree lined streets should be subject to highway authority agreement. The point on house types and tenures is repetition of policy material set out in HC1. The provision of bespoke house types is onerous and unrealistic for commercial housebuilders who work with a portfolio of house types, the reference to 'bespoke homes' is unjustified and should be amended to refer to a 'range of house types'. The policy is currently unsound.	Not stated	No	No	<p>Comments noted.</p> <p>The provision of tree lined streets will be subject to County Highways agreement and will be maintained by County Highways.</p> <p>Whilst the type and tenure of house types is set out in detail in Policy HC1, Policy HC10 provides a holistic overview of the design requirements for development proposals and is therefore considered necessary within the policy.</p> <p><b>Minor modification 017 – Amend point 'e' to:</b></p> <p><b>'Ensures attractive and distinctive development with use of a variety of materials that will remain attractive through the lifetime of the development. Developments should make use of distinctive buildings and detailing to avoid a monotonous visual appearance, aid orientation and navigation as well as helping to create local character and familiarity'.</b></p>
Pegasus Group for Miller Homes	AGT24-030-03-15	Policy HC10	Criteria a) – these documents are material considerations and should be listed as key documents beneath the policy rather than in the policy itself. Criteria c) – an element of flexibility	Not stated	No	No	<p>Comments noted.</p> <p>The wording of the policy suggests that design</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			needs to be drafted into the wording to reflect national policy. Criteria i) – should be removed to avoid unnecessary duplication elsewhere.				<p>should reflect the SPD, rather than they must be adhered to in all cases. It is not increasing the weight of the SPD but is signposting that it should be considered by applicants in working up scheme design.</p> <p>The provision of tree lined streets will be subject to County Highways agreement and will be maintained by County Highways.</p> <p>Whilst the type and tenure of house types is set out in detail in Policy HC1, Policy HC10 provides a holistic overview of the design requirements for development proposals and is therefore considered necessary within the policy.</p>
Pegasus Group for Persimmon Homes	AGT24-030-04-01	Policy HC10	The provision of tree lined streets should be subject to highway authority agreement. The point on house types and tenures is repetition of policy material set out in HC1. The provision of bespoke house types is onerous and unrealistic for commercial housebuilders who work with a portfolio of house types. The reference to 'bespoke homes' within the policy is unjustified, jeopardising the delivery of homes within the district. The policy is considered unsound as it is neither justified nor consistent with national policy.	Not stated	No	Not stated	<p>Comments noted.</p> <p>The provision of tree lined streets will be subject to County Highways agreement and will be maintained by County Highways.</p> <p>Whilst the type and tenure of house types is set out in detail in Policy HC1, Policy HC10 provides a holistic overview of the design requirements for development proposals and is therefore considered necessary within the policy.</p> <p><b>Minor modification 017 – Amend point 'e' to:</b></p> <p><b>'Ensures attractive and distinctive development with use of a variety of materials that will remain attractive through the lifetime of the development. Developments should make use of distinctive buildings and detailing to avoid a monotonous visual appearance, aid orientation and navigation as well as helping to create local character and familiarity'.</b></p>
Pegasus Group for Taylor Wimpey	AGT24-030-08-02	Policy HC10	The introduction of a detailed design policy to ensure high quality design and the creation of beautiful places is supported. However, the provision of tree lined streets should be subject to highway authority agreement. The point on house types and tenures is repetition of policy material set out in HC1. The policy should be amended to remove the repetition and ensure that Staffordshire County Highways have been consulted on the proposed draft policy.	Not stated	No	Not stated	<p>Comments noted.</p> <p>The provision of tree lined streets will be subject to County Highways agreement and will be maintained by County Highways.</p> <p>Whilst the type and tenure of house types is set out in detail in Policy HC1, Policy HC10 provides a holistic overview of the design requirements for development proposals and is therefore</p>

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							considered necessary within the policy. <b>Minor modification 017 – Amend point 'e' to:</b> <b>'Ensures attractive and distinctive development with use of a variety of materials that will remain attractive through the lifetime of the development. Developments should make use of distinctive buildings and detailing to avoid a monotonous visual appearance, aid orientation and navigation as well as helping to create local character and familiarity'.</b>
Home Builders Federation	STA24-024-02	Policy HC10	Policy HC10 is unsound because it is not positively prepared, is not effective or justified, and does not comply with national policy. It is not appropriate for Criterion a) and Criterion m) of this policy to seek to give Local Plan status to the existing South Staffordshire Design Guide SPD and the Affordable Housing SPD, especially when the policies that the SPD hangs from are to be replaced by the new Local Plan. Reference to the SPD should be relocated to the supporting text.	No	No	No	The wording of the policy suggests that design should reflect the SPD, rather than they must be adhered to in all cases. It is not increasing the weight of the SPD but is signposting that it should be considered by applicants in working up scheme design.
<b>POLICY HC11: PROTECTING AMENITY</b>							
RCA Regeneration for Barberrry Developments	AGT24-035-01-02	Policy HC11	We agree with Policies HC10, HC11, HC12 & HC13, and the need to design visually attractive homes with high quality residential amenity, adequate internal space and correct parking provision.	No	No	No	Comments noted. No changes proposed.
RCA Regeneration for Seven Capital	AGT24-035-03-02	Policy HC11	We agree with Policies HC10, HC11, HC12 & HC13, and the need to design visually attractive homes with high quality residential amenity, adequate internal space and correct parking provision.	Not stated	No	No	Comments noted. No changes proposed.
RCA Regeneration for Richborough Estates	AGT24-035-02-02	Policy HC11	We agree with Policies HC10, HC11, HC12 & HC13, and the need to design visually attractive homes with high quality residential amenity, adequate internal space and correct parking provision.	Not stated	No	No	Comments noted. No changes proposed.
Jones, C & J	RES24-124-03	HC11	Site 036c -Acton hill has become a traffic 'rat run' and is a safety issue being a narrow road with bends. - More cars would exacerbate this issue an would become even more of a danger to residents -Development would therefore be a detriment to the residents of Acton trussell	Not stated	No	Not stated	Engagement throughout plan preparation has taken place with Local Highways Authority (Staffordshire County Council). They have not indicated that the impact of the proposed allocation would not generate any significant impacts on the transport network or highway safety that cannot be mitigated in line with paragraph 114 d of the NPPF.  No change proposed.

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
<b>POLICY HC12: SPACE ABOUT DWELLINGS AND INTERNAL SPACE STANDARDS</b>							
PlanIT Planning & Development for Hampton Oak Developments	AGT24-032-02-08	Policy HC12	Policy HC12 should be revised. The requirement for internal space standards should be removed until a full and proper localised evidence is produced to demonstrate they are necessary. If the policy is to remain, it should make it clear that some flexibility to the policy may be applied depending on the individual merits of the development proposal.	Yes	No	Yes	The Council's justification for requiring the nationally described space standard is set out in the Internal Space Standards topic paper. The Council considers there are very few circumstances in which the space standard cannot be achieved. It is important to be clear on the Council's expectations for internal space from an early stage to provide clarity for developers and landowners, therefore no further wording in the policy is deemed necessary.  No change proposed.
West Midlands Housing Association Planning Consortium (Tetlow King)	STA24-050-02	Policy HC12	Policy HC12 seeks to ensure that "all new residential developments must meet or exceed the Government's Technical Housing Standards – National Described Space Standard (2015) or subsequent editions." In line with PPG, the WMHAPC welcomes the Council's efforts to demonstrate a need, the viability and timing of the introduction of Nationally Described Space Standards (NDSS). However, it is important to understand that the NDSS is not a building regulation. Whilst it understood that the Council has attempted to demonstrate a need to apply NDSS through an audit of the existing dwellings being delivered, where dwellings are not meeting NDSS, it does not necessarily mean that the dwellings being delivered are of poor quality. The application of NDSS is not essential for all dwellings to achieve these standards in order to provide good quality living. For affordable housing, in particular, there may be instances in which achieving NDSS is impractical and unnecessary.	Not stated	Not stated	Not stated	As set out in the Internal Space Standards topic paper, whilst NDSS ensures properties are built to an acceptable standard, it is also important in maintaining consistency between property types and tenure. This plays a significant role in creating tenure-neutral communities. The Council considers there is a bigger risk to affordable housing delivery in proceeding without the standard, as registered providers are often not willing to purchase properties of a lower standard from developers.  No change proposed.
First City for St Mary's Presbytery and The Archdiocese of Birmingham	AGT24-018-01-10	Policy HC12	We support the inclusion of guidance in connection to the space about dwelling amounts and inclusion of the statement "Flexibility may be applied in relation to the above standard, depending upon the site orientation and the individual merits of the development proposal." In relation to both the distance between dwellings and the amount of external space as this can be significantly impacted by the layout of sites and the orientation of dwellings. We consider it also important to note that some properties such as age restricted single storey accommodation (bungalows) including sheltered/retirement living in the form of bungalows or maisonettes should have smaller, more manageable gardens.	Not stated	Not stated	Not stated	The Homes for Older and Disabled People Topic Paper (2024) provides background information on housing need for older and disabled people and sets out the range of evidence and data used by the Council to formulate the policies and provides the justification for the proposed approach.  It is considered that the following statement is sufficient to provide a level of flexibility, when necessary, on a case-by-case basis – "flexibility may be applied in relation to the above standard, depending upon the site orientation and the individual merits of the development proposal."
Avison Young for Crest Nicholson	AGT24-004-02-03	Policy HC12	NPPG requires evidence to justify use of the Nationally Described Space Standards. The Internal Space Standards Topic Paper (2024). It does not provide any evidence of the need for NDSS to apply in the Borough and the reasons why houses in the	Yes	No	Not stated	The Internal Space Standards topic paper sets out a range of evidence to demonstrate a need for requiring NDSS. This includes consistency between property type and tenure, meeting the



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			Borough need to be bigger. There is also a risk that an inflexible approach to the adoption of NDSS could have the unintended consequence of impacting on affordability. This element of the policy is unjustified and unsound and should be deleted.				needs of the district's ageing population, providing clarity to developers through well-established requirements and safeguarding affordable housing delivery. There is no evidence to suggest NDSS will have such a significant impact to reduce affordability for residents.  No change proposed.
Gladman Developments Ltd	AGT24-019-01-01	Policy HC12	Gladman do not consider that the requirement for all residential development to meet or exceed Nationally Described Space Standard (NDSS) has been robustly justified by the Council at this stage.	Not stated	No	No	The Council's justification for requiring the nationally described space standard is set out in the Internal Space Standards topic paper.  No change proposed.
Pegasus Group for BDW Trading Ltd	AGT24-030-01-11	Policy HC12	The Internal Space Standards Topic Paper (2024) notes that not all property types delivered since the optional standard was introduced meet the standard. This does not demonstrate the need for the policy. What it demonstrates is that these property types have been deemed acceptable in the past, all matters considered. The topic paper also notes that Registered Providers have in the past declined invitations to bid for affordable homes, due to their design and lack of sufficient internal space. However, a policy which requires all new homes to meet the standard is not necessary to address that issue, as clearly not all homes in the district will be delivered by Registered Providers.	Not stated	No	Not stated	The Internal Space Standards topic paper sets out a range of evidence to demonstrate a need for requiring NDSS. This includes consistency between property type and tenure, meeting the needs of the district's ageing population, providing clarity to developers through well-established requirements and safeguarding affordable housing delivery.  No change proposed.
RCA Regeneration for Barberrry Developments	AGT24-035-01-02	Policy HC12	We agree with Policies HC10, HC11, HC12 & HC13, and the need to design visually attractive homes with high quality residential amenity, adequate internal space and correct parking provision.	No	No	No	Comments noted.  No changes proposed.
RCA Regeneration for Seven Capital	AGT24-035-03-02	Policy HC12	We agree with Policies HC10, HC11, HC12 & HC13, and the need to design visually attractive homes with high quality residential amenity, adequate internal space and correct parking provision.	Not stated	No	No	Comments noted.  No changes proposed.
RCA Regeneration for Richborough Estates	AGT24-035-02-02	Policy HC12	We agree with Policies HC10, HC11, HC12 & HC13, and the need to design visually attractive homes with high quality residential amenity, adequate internal space and correct parking provision.	Not stated	No	No	Comments noted.  No changes proposed.
Evolve Planning & Design for Lovell Homes	AGT24-017-05-01	Policy HC12	Lovell Homes has limited comment in respect of the external space standard that reflect existing policy which are generally considered appropriate. However, if bungalows are to be provided within a scheme, it would seem logical to relax garden sizes to allow for the provision of communal gardens to ensure efficient use of land.	Yes	No	Yes	Comments noted.  It is considered that the following statement is sufficient to provide a level of flexibility, when necessary, on a case-by-case basis – "flexibility may be applied in relation to the above standard, depending upon the site orientation and the individual merits of the development proposal."  No change proposed.
Evolve Planning & Design for Lovell Homes	AGT24-017-05-01	Policy HC12	Lovell Homes do object to the internal floorspace policy requirement for all homes to meet NDSS (details provided in paragraphs 6.6 – 6.15 of full representation) It is clear that the	Yes	No	Yes	The Internal Space Standards topic paper sets out a range of evidence to demonstrate a need for requiring NDSS. This includes consistency

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			evidence does not currently support the imposition of the optional NDSS within South Staffordshire. To the contrary, the evidence highlights a number of potential risks if such a policy were to be introduced. NDSS requirement should be removed.				between property type and tenure, meeting the needs of the district's ageing population, providing clarity to developers through well-established requirements and safeguarding affordable housing delivery. The Council believes the benefit of requiring NDSS outweighs the small potential risks of doing so.  No change proposed.
Evolve Planning & Design for Keon Homes	AGT24-017-04-01	Policy HC12	Keon Homes has limited comment in respect of the external space standard that reflect existing policy which are generally considered appropriate. However, if bungalows are to be provided within a scheme, it would seem logical to relax garden sizes to allow for the provision of communal gardens to ensure efficient use of land.	Yes	No	Yes	Comments noted.  It is considered that the following statement is sufficient to provide a level of flexibility, when necessary, on a case-by-case basis – "flexibility may be applied in relation to the above standard, depending upon the site orientation and the individual merits of the development proposal."  No change proposed.
Evolve Planning & Design for Keon Homes	AGT24-017-04-01	Policy HC12	Keon Homes do object to the internal floorspace policy requirement for all homes to meet NDSS (details provided in paragraphs 6.6 – 6.14 of full representation) It is clear that the evidence does not currently support the imposition of the optional NDSS within South Staffordshire. To the contrary, the evidence highlights a number of potential risks if such a policy were to be introduced. NDSS requirement should be removed.	Yes	No	Yes	The Internal Space Standards topic paper sets out a range of evidence to demonstrate a need for requiring NDSS. This includes consistency between property type and tenure, meeting the needs of the district's ageing population, providing clarity to developers through well-established requirements and safeguarding affordable housing delivery. The Council believes the benefit of requiring NDSS outweighs the small potential risks of doing so.  No change proposed.
Evolve Planning & Design for Four Ashes Road Ltd	AGT24-017-03-01	Policy HC12	Four Ashes Road Ltd has limited comment in respect of the external space standard that reflect existing policy which are generally considered appropriate. However, if bungalows are to be provided within a scheme, it would seem logical to relax garden sizes to allow for the provision of communal gardens to ensure efficient use of land.	Yes	No	Yes	Comments noted.  It is considered that the following statement is sufficient to provide a level of flexibility, when necessary, on a case-by-case basis – "flexibility may be applied in relation to the above standard, depending upon the site orientation and the individual merits of the development proposal."  No change proposed.
Evolve Planning & Design for Four Ashes Road Ltd	AGT24-017-03-01	Policy HC12	Four Ashes Road Ltd do object to the internal floorspace policy requirement for all homes to meet NDSS (details provided in paragraphs 6.6 – 6.15 of full representation) It is clear that the evidence does not currently support the imposition of the optional NDSS within South Staffordshire. To the contrary, the evidence highlights a number of potential risks if such a policy were to be introduced. NDSS requirement should be removed.	Yes	No	Yes	The Internal Space Standards topic paper sets out a range of evidence to demonstrate a need for requiring NDSS. This includes consistency between property type and tenure, meeting the needs of the district's ageing population, providing clarity to developers through well-established requirements and safeguarding

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							affordable housing delivery. The Council believes the benefit of requiring NDSS outweighs the small potential risks of doing so.  No change proposed.
Evolve Planning & Design for Cameron Homes	AGT24-017-02-01	Policy HC12	Cameron Homes has limited comment in respect of the external space standard that reflect existing policy which are generally considered appropriate. However, if bungalows are to be provided within a scheme, it would seem logical to relax garden sizes to allow for the provision of communal gardens to ensure efficient use of land.	Yes	No	Yes	Comments noted.  It is considered that the following statement is sufficient to provide a level of flexibility, when necessary, on a case-by-case basis – “flexibility may be applied in relation to the above standard, depending upon the site orientation and the individual merits of the development proposal.”  No change proposed.
Evolve Planning & Design for Cameron Homes	AGT24-017-02-01	Policy HC12	Cameron Homes do object to the internal floorspace policy requirement for all homes to meet NDSS (details provided in paragraphs 6.6 – 6.15 of full representation) It is clear that the evidence does not currently support the imposition of the optional NDSS within South Staffordshire. To the contrary, the evidence highlights a number of potential risks if such a policy were to be introduced. NDSS requirement should be removed.	Yes	No	Yes	The Internal Space Standards topic paper sets out a range of evidence to demonstrate a need for requiring NDSS. This includes consistency between property type and tenure, meeting the needs of the district’s ageing population, providing clarity to developers through well-established requirements and safeguarding affordable housing delivery. The Council believes the benefit of requiring NDSS outweighs the small potential risks of doing so.  No change proposed.
Evolve Planning & Design for Bloor Homes	AGT24-017-01-09	Policy HC12	It is clear that the evidence does not currently support the imposition of the optional NDSS within South Staffordshire. To the contrary, the evidence highlights a number of potential risks if such a policy were to be introduced. NDSS requirement should be removed.	Yes	No	Yes	The Internal Space Standards topic paper sets out a range of evidence to demonstrate a need for requiring NDSS. This includes consistency between property type and tenure, meeting the needs of the district’s ageing population, providing clarity to developers through well-established requirements and safeguarding affordable housing delivery. The Council believes the benefit of requiring NDSS outweighs the small potential risks of doing so.  No change proposed.
Harris Lamb for Redrow Homes	AGT24-022-03-11	Policy HC12	RH wish to object to the requirement that all new residential developments must meet or exceed the Government’s technical housing standards. (Text taken from the NPPF and PPG in full representation). In light of the policy and guidance in the Framework and PPG it is not clear that the evidence of need for NDSS has been provided and, therefore, we do not consider there is sufficient justification for inclusion of the NDSS requirement within the policy. As such, we consider that the policy is unsound as the	Yes	No	Not stated	The Internal Space Standards topic paper sets out a range of evidence to demonstrate a need for requiring NDSS. This includes consistency between property type and tenure, meeting the needs of the district’s ageing population, providing clarity to developers through well-established requirements and safeguarding affordable housing delivery. The Council believes the benefit of requiring NDSS outweighs the

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			evidential requirements set out in policy and guidance has not been met. The policy is not justified. RH therefore seek the removal of the requirement to provide NDSS from the policy until such time as the evidence required justify its inclusion has been presented.				small potential risks of doing so.  No change proposed.
Harris Lamb for Redrow Homes	AGT24-022-03-11	Policy HC12	In respect of external space, the policy is helpful in setting out the external space requirements to be accommodated within new development. Furthermore, confirmation that the standards can be applied flexibly due to site orientation and other site constraints is also welcomed.	Yes	No	Not stated	Comments noted.  No change proposed.
Turley Associates for Bellway Homes	AGT24-041-01-02	Policy HC12	Please refer to our previous representations made in December 2022 on this matter at Appendix 1. 2022 Rep – the requirement to meet the NDSS is considered reasonable. External space standards and amenity spaces should not be explicitly stated within the policy.	No	No	No	It is important to be clear on the Council’s expectations for external space standards and amenity space from an early stage to provide clarity for developers and landowners, therefore no further wording in the policy is deemed necessary.
First City Ltd for UKPI Ltd	AGT24-018-02-09	Policy HC12	We support the inclusion of guidance in connection to the space about dwelling amounts and inclusion of the statement “Flexibility may be applied in relation to the above standard, depending upon the site orientation and the individual merits of the development proposal.” This should apply to both the distance between dwellings and the amount of external space as this can be significantly impacted by the layout of sites and the orientation of dwellings.	Not stated	Not stated	Not stated	Comments noted.  No change proposed.
Marrons Planning for L&Q Estates	AGT24-027-03-01	Policy HC12	The fourth paragraph of Draft Policy HC12 seeks to implement, as a minimum, the requirements of the Nationally Described Space Standard (NDSS) for all new residential development in South Staffordshire. L&Q Estates are supportive of the NDSS being used to influence the standard of housing developments, however there may be instances where greater flexibility is required in order to meet need. Further, L&Q Estates consider that the introduction of such standards is contrary to the NPPF which is clear that optional technical standards for accessible and adaptable housing should only be introduced where this will address an identified need for such properties. L&Q Estates consider that if the Government had expected all properties to be built to NDSS, that they would have made such standards mandatory and not optional requiring sufficient evidence.	Yes	No	yes	The Internal Space Standards topic paper sets out a range of evidence to demonstrate a need for requiring NDSS. This includes consistency between property type and tenure, meeting the needs of the district’s ageing population, providing clarity to developers through well-established requirements and safeguarding affordable housing delivery.  No change proposed.
Grade Planning	AGT24-021-01-03	Policy HC12	This policy is not consistent with Draft Policy HC4 as the external space requirements do not sufficiently reflect the needs of older people or those with special housing requirements, where a lower provision and length of amenity space may be more appropriate. This is important in order to provide housing that is suitable for older people or those with special housing requirements whilst also making most efficient use of land. The policy wording under ‘external space’ should be amended to	Yes	Yes	Yes	Comments noted.  It is considered that the following statement is sufficient to provide a level of flexibility, when necessary, on a case-by-case basis – “flexibility may be applied in relation to the above standard, depending upon the site orientation and the individual merits of the development proposal.”

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			specifically state that: 'In the case of units designed for older people or those with special housing requirements, a lower provision and length of amenity space may be acceptable'. The supporting text should explain that for those properties it may be more appropriate to provide smaller, lower maintenance external space.				No change proposed.
Pegasus Group for Richborough Estates	AGT24-030-05-02	Policy HC12	The continuity of existing external space and dwelling standards is generally supported. The introduction of the optional NDSS to all new homes should accord with the provisions of the NPPF. IT should still allow for flexibility when a different solution might be required. This needs to be referenced in the policy wording.	Yes	No	Yes	The Council's justification for requiring the nationally described space standard is set out in the Internal Space Standards topic paper. The Council considers there are very few circumstances in which the space standard cannot be achieved. It is important to be clear on the Council's expectations for internal space from an early stage to provide clarity for developers and landowners, therefore no further wording in the policy is deemed necessary.  No change proposed.
Pegasus Group for Clowes Developments	AGT24-030-02-02	Policy HC12	The continuity of existing external space and dwelling standards is generally supported. The introduction of the optional NDSS to all new homes should accord with the provisions of the NPPF. IT should still allow for flexibility when a different solution might be required. This needs to be referenced in the policy wording.	Not stated	No	No	The Council's justification for requiring the nationally described space standard is set out in the Internal Space Standards topic paper. The Council considers there are very few circumstances in which the space standard cannot be achieved. It is important to be clear on the Council's expectations for internal space from an early stage to provide clarity for developers and landowners, therefore no further wording in the policy is deemed necessary.  No change proposed.
Pegasus Group for Miller Homes	AGT24-030-03-15	Policy HC12	We do not consider that this policy is justified. NDSS is an optional standard. It is for the Council to provide justification for requiring the internal space policy, with PPG providing details on what factors should be considered. It is justified to allow for a level of flexibility within the policy and to do otherwise could have a knock-on impact on housing delivery.	Not stated	No	No	The Council's justification for requiring the nationally described space standard is set out in the Internal Space Standards topic paper. The Council considers there are very few circumstances in which the space standard cannot be achieved. It is important to be clear on the Council's expectations for internal space from an early stage to provide clarity for developers and landowners, therefore no further wording in the policy is deemed necessary.  No change proposed.
Pegasus Group for Persimmon Homes	AGT24-030-04-01	Policy HC12	The requirement to comply with NDSS is generally supported. Some flexibility must be allowed in its application as occasionally a small minority of homes on larger sites may require non-compliance with NDSS for sound urban design reasons. The policy is considered unsound as it is neither justified nor consistent with national policy.	Not stated	No	Not stated	The Council's justification for requiring the nationally described space standard is set out in the Internal Space Standards topic paper. The Council considers there are very few circumstances in which the space standard cannot be achieved. It is important to be clear on



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							the Council's expectations for internal space from an early stage to provide clarity for developers and landowners, therefore no further wording in the policy is deemed necessary.  No change proposed.
Pegasus Group for Taylor Wimpey	AGT24-030-08-02	Policy HC12	The continuity of existing external space and dwelling standards is generally supported although there should be some recognition that certain house types (M4(2) dwellings) should have smaller, more manageable gardens. Taylor Wimpey suggests that some flexibility must be allowed in the application of the NDSS as occasionally, non-compliance with NDSS may be appropriate.	Not stated	No	Not stated	The Council considers there are very few circumstances in which the space standard cannot be achieved. It is important to be clear on the Council's expectations for internal space from an early stage to provide clarity for developers and landowners, therefore no further wording in the policy is deemed necessary.  No change proposed.
PlanIT Planning & Development for Miller Homes	AGT24-032-04-08	Policy HC12	The starting point for the preparation of Local Plans is that they should not include policies requiring NDSS compliant housing. The NPPF makes it clear that policies should make use of the Government's optional technical standards for accessible and adaptable housing. The Internal Space Standards Topic Paper does not justify the requirement for use of space standards, it identifies a series of generic matters that are relevant throughout the country. There is no evidence to suggest that the existing stock of housing is deficient against NDSS, in the absence of such evidence there is no policy justification to impose the standards on all new development. If the Council insists all new properties must meet NDSS, entry level properties will be more expensive and those additional costs will be passed on to house buyers.	Yes	No	Yes	The Internal Space Standards topic paper sets out a range of evidence to demonstrate a need for requiring NDSS. This includes consistency between property type and tenure, meeting the needs of the district's ageing population, providing clarity to developers through well-established requirements and safeguarding affordable housing delivery. There is no evidence to suggest NDSS will have such a significant impact to reduce affordability for residents. The Council believes the benefit of requiring NDSS outweighs the small potential risks of doing so.  No change proposed.
Home Builders Federation	STA24-024-02	Policy HC12	Policy HC12 is unsound because it is not positively prepared, is not effective or justified, and does not comply with national policy.  HBF does not support the introduction of the optional Nationally Described Space Standard though policies in individual Local Plans. If the Council wanted to do this they would need robust justifiable evidence to introduce the NDSS, as any policy which seeks to apply the optional nationally described space standards (NDSS) to all dwellings should only be done in accordance with the NPPF which states that "policies may also make use of the NDSS where the need for an internal space standard can be justified".  The HBF highlight potential implications on housing need, viability and timing. HBF considers that if the Government had expected all properties to be built to NDSS that they would have made these standards mandatory not optional. If the proposed requirement for NDSS is carried forward, then the Council should put forward proposals for transitional arrangements and not	No	No	No	The Council's justification for requiring the nationally described space standard is set out in the Internal Space Standards topic paper. It also sets out the reasoning for not implementing a transitional period.  No change proposed.

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			apply to reserved matters applications.				
<b>POLICY HC13: PARKING PROVISION</b>							
Carter Jonas for South Staffordshire College	AGT24-008-02-01	Policy HC13	At South Staffordshire College, due to the campus' location, 1 space per 5 staff and 1 space per 3 students would be excessive and lead to a significant amount of cycle storage remaining unused, detracting from the character and appearance of the site and surrounding area. We request an additional sentence is added into Draft Policy HC16: South Staffordshire College (Rodbaston) to confirm the parking requirements set out in Appendix I are not applicable to our client's site. This would ensure the Development Plan is justified by creating an appropriate strategy based on proportionate evidence. The Parking Standards also require colleges to provide 20% of available car parking spaces to be fitted with a fast charge socket and a further 20% of available spaces to be provided with power supply to provide additional fast charge sockets. We strongly support the principle of providing the infrastructure to enable the transition towards electric vehicles. However, South Staffordshire College have power limitations which will restrict the infrastructure which can be brought forward without the provision of an additional power line which would be a significant financial expense. To ensure the Publication Plan is deliverable over the plan period and therefore meets the test of 'soundness' in respect of effectiveness, the wording should be amended to caveat that it will be assessed on a case by case basis, taking into account viability and existing infrastructure provision.	Not stated	No	Not stated	Comments noted.  The Parking Standards detailed in Appendix H relate to "new development, extensions and changes of use. When considering an extension to an existing use, the standard will be applied only to the extension and any shortfall in parking provision for the existing building will not be required to be met." The standards for cycle parking and EVCP will apply in line with the guidance above and it will not require South Staffordshire College to implement cycle parking and EVCP retrospectively for the entire site, unless the site is redeveloped in its entirety.  It is not considered appropriate to add in text requiring an assessment on a 'case-by-case' basis as the cycle parking and EVCP requirements are expected to be met on new development, and in line with national regulations.  No changes proposed.
First City for St Mary's Presbytery and The Archdiocese of Birmingham	AGT24-018-01-11	Policy HC13	Site 079 Kiddemore Green, Brewood is proposing to provide village parking to assist with the shortage of parking currently in the centre of the village Brewood. Thus, providing an excellent community benefit in the form of additional parking as part of the scheme meeting the requirements of Policy HC13. We believe this should be taken into consideration as part of the many benefits of the site and it should be re-instated as a proposed allocation.	Not stated	Not stated	Not stated	Comments noted.  Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.
Avison Young for Crest Nicholson	AGT24-004-02-03	Policy HC13	Appendix H sets out a requirement for 1 fast EV charge socket per house with on plot parking and 1 fast EV charge socket per for flats and apartments with allocated and unallocated spaces. Crest supports the provision of electric vehicle charging points, in principle, but believes that the references to EV charging in Appendix H of the Local Plan should be deleted. This is because Part S of the Building Regulations now set out the national requirements for the provision of EV charging infrastructure in new developments. There is no need to repeat these and no justification to go beyond the national requirements set out in Building Regulations.	Yes	No	Not stated	Minor modification 019 – Policy HC13 "the Council's recommended parking standards are set out in Appendix H-I"  Minor modification 069: – Appendix H Facilitates Facilities
RCA Regeneration for Barberry	AGT24-035-01-1	Policy HC13	We agree with Policies HC10, HC11, HC12 & HC13, and the need to design visually attractive homes with high quality residential	No	No	No	Comments noted.

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**CHAPTER 8 & POLICIES HC10-HC13: DESIGN AND SPACE STANDARDS**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
Developments	02		amenity, adequate internal space and correct parking provision. HC13 should however make clear at Appendix H (table 10) that the spaces requirement is a maximum.				As stated in the supporting text of Appendix H, the NPPF seeks to remove maximum parking standards and the standards set out in Appendix H are to be used as a starting point for scheme design, they are not maximum space requirements.  No changes proposed.
RCA Regeneration for Seven Capital	AGT24-035-03-02	Policy HC13	We agree with Policies HC10, HC11, HC12 & HC13, and the need to design visually attractive homes with high quality residential amenity, adequate internal space and correct parking provision. HC13 should however make clear at Appendix H (table 10) that the spaces requirement is a maximum.	Not stated	No	No	Comments noted.  As stated in the supporting text of Appendix H, the NPPF seeks to remove maximum parking standards and the standards set out in Appendix H are to be used as a starting point for scheme design, they are not maximum space requirements.  No changes proposed.
RCA Regeneration for Richborough Estates	AGT24-035-02-02	Policy HC13	We agree with Policies HC10, HC11, HC12 & HC13, and the need to design visually attractive homes with high quality residential amenity, adequate internal space and correct parking provision. HC13 should however make clear at Appendix H (table 10) that the spaces requirement is a maximum.	Not stated	No	No	Comments noted.  As stated in the supporting text of Appendix H, the NPPF seeks to remove maximum parking standards and the standards set out in Appendix H are to be used as a starting point for scheme design, they are not maximum space requirements.  No changes proposed.
Evolve Planning & Design for Lovell Homes	AGT24-017-05-01	Policy HC13	Lovell Homes supports the proposed parking standards contained within the Publication Plan. It is no longer necessary for the Council to have a proposed policy requirement for EVCPs as this is included in Government Regulations.	Not stated	Not stated	Not stated	The council is taking an ambitious approach to tackling climate change with the requirements for EVCPs part of the package of climate measures the plan will deliver.
Evolve Planning & Design for Keon Homes	AGT24-017-04-01	Policy HC13	Keon Homes supports the proposed parking standards contained within the Publication Plan. It is no longer necessary for the Council to have a proposed policy requirement for EVCPs as this is included in Government Regulations.	Not stated	Not stated	Not stated	The council is taking an ambitious approach to tackling climate change with the requirements for EVCPs part of the package of climate measures the plan will deliver.
Evolve Planning & Design for Four Ashes Road Ltd	AGT24-017-03-01	Policy HC13	Four Ashes Road Ltd supports the proposed parking standards contained within the Publication Plan. It is no longer necessary for the Council to have a proposed policy requirement for EVCPs as this is included in Government Regulations.	Not stated	Not stated	Not stated	The council is taking an ambitious approach to tackling climate change with the requirements for EVCPs part of the package of climate measures the plan will deliver.
Evolve Planning & Design for Cameron Homes	AGT24-017-02-01	Policy HC13	Cameron Homes supports the proposed parking standards contained within the Publication Plan. It is no longer necessary for the Council to have a proposed policy requirement for EVCPs as this is included in Government Regulations.	Not stated	Not stated	Not stated	The council is taking an ambitious approach to tackling climate change with the requirements for EVCPs part of the package of climate measures the plan will deliver.
Evolve Planning & Design for Bloor	AGT24-017-01-01	Policy HC13	Land East of Bilbrook - Bloor Homes supports the proposed parking standards contained within the Publication Plan. It is no	Not stated	Not stated	Not stated	The council is taking an ambitious approach to tackling climate change with the requirements for

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**CHAPTER 8 & POLICIES HC10-HC13: DESIGN AND SPACE STANDARDS**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
Homes	09		longer necessary for the Council to have a proposed policy requirement for EVCPs as this is included in Government Regulations.				EVCPs part of the package of climate measures the plan will deliver.
Harris Lamb for Redrow Homes	AGT24-022-03-12	Policy HC13	RH note the requirement that the standards set out in the appendix are a starting point for considering the level of cycle and car parking required to support a new scheme. We welcome the inclusion of the other criteria upon which the exact level of parking can be determined and agree that this provides a flexible approach to determining the appropriate level of car parking associated with new development. Just as a point of correction the car parking standards are set out in Appendix H not Appendix I as referenced within the policy.	Yes	Yes	Not stated	Comments and support noted.  Minor modification 019 – Policy HC13 “the Council’s recommended parking standards are set out in Appendix H I”
Turley Associates for Bellway Homes	AGT24-041-01-02	Policy HC13	Please refer to our previous representations made in December 2022 on this matter at Appendix 1. 2022 Rep – Bellway support the Council’s endeavours to encourage electric vehicle uptake but should avoid repeating EV requirements which are otherwise secured through Building Regulations.	No	No	No	The council is taking an ambitious approach to tackling climate change with the requirements for EVCPs part of the package of climate measures the plan will deliver.
Lloyd, K	RES24-136-11	Policy HC13	Remove reference to hydrogen from this plan. It has been proved that Hydrogen for cars is not a sustainable fuel and makes this policy look out of date, it is not an emerging technology, far from it. It is expensive to produce, requires huge infrastructure and most importantly, unavailable in the west midlands.	Yes	No	Yes	Reference to hydrogen is just an example of an emerging fuel technology.  No change proposed.

**CHAPTER 9 & POLICIES HC14-HC19: PROMOTING SUCCESSFUL AND SUSTIANBLE COMMUNITIES**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
<b>GENERAL ISSUES: CHAPTER 9 (inc specific paras references)</b>							
Watt, J	RES24-246-07	9.1	Local surgeries around site 036c – land south of Stafford, already full and difficult to get an appointment for existing patients. Extra residents would again need to use Stafford surgeries. No direct public transport to local surgery making it difficult for people without their own transport.  Site 036c should remain as agricultural land.	No	No	No	Engagement throughout plan preparation has taken place with Staffordshire and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical Commissioning Group). They have not indicated that the impact of the proposed allocation is incapable of being mitigated through financial contributions in line with Policy HC14.  Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district’s agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.  No change proposed.
Watt, J	RES24-246-08	9.2	No new schools planned for the area around site 036c – land south of Stafford.  Site 036c should remain as agricultural land.	No	No	No	Engagement throughout plan preparation has taken place with the School Organisation Team (SOT) at Staffordshire County Council. They have not indicated that the impact of the proposed allocation is incapable of being mitigated through financial contributions in line with Policy HC15.  Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district’s agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.  No change proposed.
<b>POLICY HC14: HEALTH INFRASTRUCTURE</b>							



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**CHAPTER 9 & POLICIES HC14-HC19: PROMOTING SUCCESSFUL AND SUSTIANBLE COMMUNITIES**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
Wombourne Parish Council	STA24-052-01	Policy HC14	Cannot find any published information on whether area health authorities were consulted at strategic level on the imposition of such housing numbers (even the reduced numbers) and the demographics of the projected population over the plan period. We seek detail on any potential health levy against properties built for local health services.	Not stated	Yes	Not stated	Engagement throughout plan preparation has taken place with Staffordshire and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical Commissioning Group).
Goldfinch Town Planning Services	AGT24-020-01-01	Policy HC14	Have concerns how the Local Plan Review can help tackle South Staffordshire Districts worsening and out-of-control childhood and adult obesity crisis (protect public health), minimise air pollution	No	No	No	The impact upon air quality from development on designated sites has been considered by partner authorities that has incorporated assessments of the predicted growth in vehicular movements across all site allocations. This includes cumulative impacts. Furthermore, there is only one Air Quality Management Area (AQMA) in the district which is located along the A5 between M6 J12 and Cannock (AQMA No.5 Oak Farm) where there are no allocations proposed.
NHS Property Services	STA24-034-01	Policy HC14	NHSPS support the amended wording of HC14 which specifically pertains to the loss of healthcare infrastructure and enables necessary NHS estate reorganisations. NHSPS welcome contributions being sought for health infrastructure but find that as drafted the policy does not sufficiently consider the likely level of healthcare infrastructure required to support all levels and sources of growth proposed by the plan. In areas of significant housing growth, appropriate funding must be consistently leveraged through developer contributions. We highlight the need to consider the required mitigation arising from the significant cumulative impact of smaller housing growth and request that the Council continue its engagement with the NHS to further refine the identified healthcare needs and to ensure proposed solutions consider all levels of growth proposed. The policy states it will consider the expansion of existing services within the relevant Primary Care Network. NHSPS request the Council consider the need for flexibility of healthcare providers in determining the most appropriate means of meeting the relevant healthcare needs arising from new development.	Not stated	Not stated	Not stated	Comments noted.  Engagement throughout plan preparation has taken place with Staffordshire and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical Commissioning Group). It is considered that Policy HC14 provides appropriate measures for obtaining financial contributions which will effectively mitigate proposed developments.  <b>Minor modification 019 – “through engagement with the ICS ICB”</b>
NHS Property Services	STA24-034-01	Policy HC14	The delivery of new and improved healthcare is significantly resource intensive. New development should make a proportionate contribution to funding the healthcare needs arising from new development. Health provision is an integral part of sustainable development – access to essential healthcare services promotes good health outcomes and supports the overall social and economic wellbeing of an area. Residential developments often have significant impacts in terms of needing additional primary healthcare provision for future residents and should be considered the forefront of priorities for infrastructure delivery. Planning policies should enable the	Not stated	Not stated	Not stated	Comments noted.  Engagement throughout plan preparation has taken place with Staffordshire and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical Commissioning Group). It is considered that Policy HC14 provides appropriate measures for obtaining financial contributions which will effectively mitigate proposed developments.

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**CHAPTER 9 & POLICIES HC14-HC19: PROMOTING SUCCESSFUL AND SUSTIANBLE COMMUNITIES**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			delivery of essential healthcare infrastructure and be prepared in consultation with the NHS to ensure they help deliver estate transformation.				
Avison Young for Crest Nicholson	AGT24-004-02-03	Policy HC14	Should make specific reference to the CIL Regulation 122 tests for planning obligations to ensure that any requests for financial contributions towards infrastructure are appropriately justified, lawful and comply with national policy.	Yes	No	Not stated	The requirements for planning obligations are set out in NPPF (December 2023) paragraph 57 and it is not therefore considered necessary to repeat these within the policy.  No change proposed.
Robson, A	RES24-200-01	Policy HC14	Doctors under immense pressure so healthcare options are poor.	Not stated	No	Not stated	Comments noted.
Advance Land & Planning for Seabridge Developments	AGT24-002-02-01	Policy HC14	Health infrastructure is rightly funded through the NHS and we are concerned that the potential requirements for financial contributions to the Integrated Care Board represents nothing more than another 'roof tax' on new housing.  The implication is that provision of new homes will add to demands on health infrastructure that cannot otherwise be funded. The Local Plan is primarily to meet local housing needs. The requirement implies that all future residents will be new to the area when the opposite is true - the majority of occupiers, especially first-time buyers and the elderly, are likely to be living in the area and therefore will not necessarily create additional pressures.  The NHS has the responsibility to fund and provide care for residents of development and therefore it is unclear how a developer can legally be required to contribute to the funding of NHS care that is entirely unrelated to the development - (R. (on the application of University Hospitals of Leicester NHS Trust v Harborough DC) [2023] EWHC 263.	Not stated	Not stated	Not stated	It will be for the ICB to request and justify a financial contribution through the Development Management (DM) process in line with the CIL 122 Regulations, in the same way contributions towards education are sought.  No change proposed.
Advance Land and Planning Ltd for BSA Environmental Ltd	AGT24-002-01-01	Policy HC14	Object to Policy HC14. Health Infrastructure is rightly funded through the NHS and we are concerned that the requirements for potential financial contributions to the Integrated Care Board represents nothing more than another 'roof tax' on new housing. The majority of occupiers, especially first time buyers and the elderly, are already likely to be living in the area and therefore the new homes will not necessarily create additional pressures on health infrastructure. Unclear how a developer can legally be required to contribute to the funding of NHS care that is entirely unrelated to the development.	Not stated	Not stated	Not stated	It will be for the ICB to request and justify a financial contribution through the Development Management (DM) process in line with the CIL 122 Regulations, in the same way contributions towards education are sought.  No change proposed.
Advance Land & Planning for Stephens, M	AGT24-002-03-01	Policy HC14	Health infrastructure is rightly funded through the NHS and we are concerned that the potential requirements for financial contributions to the Integrated Care Board represents nothing more than another 'roof tax' on new housing. The implication is that provision of new homes will add to demands on health infrastructure that cannot otherwise be	Not stated	Not stated	Not stated	It will be for the ICB to request and justify a financial contribution through the Development Management (DM) process in line with the CIL 122 Regulations, in the same way contributions towards education are sought.

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>funded. The Local Plan is primarily to meet local housing needs. The requirement implies that all future residents will be new to the area when the opposite is true - the majority of occupiers, especially first-time buyers and the elderly, are likely to be living in the area and therefore will not necessarily create additional pressures.</p> <p>The NHS has the responsibility to fund and provide care for residents of development and therefore it is unclear how a developer can legally be required to contribute to the funding of NHS care that is entirely unrelated to the development - (R. (on the application of University Hospitals of Leicester NHS Trust v Harborough DC) [2023] EWHC 263.</p>				No change proposed.
RCA Regeneration for Barberrry Developments	AGT24-035-01-02	Policy HC14	We recognise the importance of supporting infrastructure. It is true that the provision of housing contributes significantly to such supporting infrastructure via Section 106 agreements.	No	No	No	<p>Comments noted.</p> <p>No changes proposed.</p>
RCA Regeneration for Seven Capital	AGT24-035-03-02	Policy HC14	We recognise the importance of supporting infrastructure. It is true that the provision of housing contributes significantly to such supporting infrastructure via Section 106 agreements.	Not stated	No	No	<p>Comments noted.</p> <p>No changes proposed.</p>
Evolve Planning & Design for Bloor Homes	AGT24-017-01-09	Policy HC14	Land East of Bilbrook - Bloor Homes recognises the need for development to address unacceptable impact on health infrastructure. It considers this policy should provide additional flexibility by recognising on-site provision of health infrastructure may represent a more appropriate solution to meeting health needs.	Not stated	Not stated	Not stated	<p>Comments noted.</p> <p>No changes proposed.</p>
Pegasus Group for Richborough Estates	AGT24-030-05-02	Policy HC14	<p>The policy continues to refer to proposed development causing 'unacceptable impact' on existing healthcare facilities but fails to define what level of impact is deemed unacceptable or how that is to be measured. The policy should acknowledge that not all residents of a development will be new to a catchment area and may indeed already be registered by the local health care provider, thereby not creating a net additional burden.</p> <p>The requirement for CIL Reg compliance of any request should be clearly specified within policy.</p> <p>The policy needs to be more explicit over what health infrastructure it is needing.</p>	Yes	No	Yes	<p>The point at which development causes an 'unacceptable impact' on healthcare facilities will be assessed on a case-by-case basis as it is dependent on the location, the proposed development, and the existing facilities provided in the locality. Similarly, the health infrastructure required will not be the same across all proposed allocations, and therefore quantifying the requirements within the policy is not possible. These will be assessed under any forthcoming planning applications in consultation with Staffordshire and Stoke on Trent Integrated Care Board.</p> <p>The policy does not state that all residents of proposed development will be new to the area or the local healthcare facility.</p> <p>The requirements for planning obligations are set out in NPPF (December 2023) paragraph 57 and it is not therefore considered necessary to repeat these within the policy.</p>
Pegasus Group for	AGT24-	Policy	The policy continues to refer to proposed development causing	Yes	No	Yes	The point at which development causes an

**CHAPTER 9 & POLICIES HC14-HC19: PROMOTING SUCCESSFUL AND SUSTIANBLE COMMUNITIES**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
Richborough Estates	030-05-02	HC14	'unacceptable impact' on existing healthcare facilities but fails to define what level of impact is deemed unacceptable or how that is to be measured. The policy should acknowledge that not all residents of a development will be new to the catchment area and may already be registered by the local healthcare provider. The requirement for CIL Reg compliance of any request should be clearly specified, especially in view of recent appeal decisions. The policy is unsound as it is neither justified not consistent with national policy.				<p>'unacceptable impact' on healthcare facilities will be assessed on a case-by-case basis as it is dependent on the location, the proposed development, and the existing facilities provided in the locality. Similarly, the health infrastructure required will not be the same across all proposed allocations, and therefore quantifying the requirements within the policy is not possible. These will be assessed under any forthcoming planning applications in consultation with Staffordshire and Stoke on Trent Integrated Care Board.</p> <p>The policy does not state that all residents of proposed development will be new to the area or the local healthcare facility.</p> <p>The requirements for planning obligations are set out in NPPF (December 2023) paragraph 57 and it is not therefore considered necessary to repeat these within the policy.</p>
Pegasus Group for Clowes Developments	AGT24-030-02-02	Policy HC14	The policy continues to refer to proposed development causing 'unacceptable impact' on existing healthcare facilities but fails to define what level of impact is deemed unacceptable or how that is to be measured. The policy should acknowledge that not all residents of a development will be new to the catchment area and may already be registered by the local healthcare provider. The requirement for CIL Reg compliance of any request should be clearly specified, especially in view of recent appeal decisions. The policy is unsound as it is neither justified not consistent with national policy.	Not stated	No	No	<p>The point at which development causes an 'unacceptable impact' on healthcare facilities will be assessed on a case-by-case basis as it is dependent on the location, the proposed development, and the existing facilities provided in the locality. Similarly, the health infrastructure required will not be the same across all proposed allocations, and therefore quantifying the requirements within the policy is not possible. These will be assessed under any forthcoming planning applications in consultation with Staffordshire and Stoke on Trent Integrated Care Board.</p> <p>The policy does not state that all residents of proposed development will be new to the area or the local healthcare facility.</p> <p>The requirements for planning obligations are set out in NPPF (December 2023) paragraph 57 and it is not therefore considered necessary to repeat these within the policy.</p>
Pegasus Group for Persimmon Homes	AGT24-030-04-01	Policy HC14	The policy continues to refer to proposed development causing 'unacceptable impact' on existing healthcare facilities but fails to define what level of impact is deemed unacceptable or how that is to be measured. The policy should acknowledge that not all residents of a development will be new to the catchment area and may already be registered by the local healthcare provider.	Not stated	No	Not stated	<p>The point at which development causes an 'unacceptable impact' on healthcare facilities will be assessed on a case-by-case basis as it is dependent on the location, the proposed development, and the existing facilities provided in the locality. Similarly, the health infrastructure</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			Careful analysis is required with regard to the capacity of existing infrastructure to accommodate new patients, before reaching a conclusion as to what any CIL Regulation 122 compliant financial request might be. The policy is considered unsound.				<p>required will not be the same across all proposed allocations, and therefore quantifying the requirements within the policy is not possible. These will be assessed under any forthcoming planning applications in consultation with Staffordshire and Stoke on Trent Integrated Care Board.</p> <p>The policy does not state that all residents of proposed development will be new to the area or the local healthcare facility.</p> <p>The requirements for planning obligations are set out in NPPF (December 2023) paragraph 57 and it is not therefore considered necessary to repeat these within the policy.</p>
Pegasus Group for Taylor Wimpey	AGT24-030-08-02	Policy HC14	The policy continues to refer to proposed development causing 'unacceptable impact' on existing healthcare facilities but fails to define what level of impact is deemed unacceptable or how that is to be measured. The policy should acknowledge that not all residents of a development will be new to the catchment area and may already be registered by the local healthcare provider. Careful analysis is required with regard to the capacity of existing infrastructure to accommodate new patients, before reaching a conclusion as to what any CIL Regulation 122 compliant financial request might be. The policy is considered unsound.	Not stated	No	Not stated	<p>The point at which development causes an 'unacceptable impact' on healthcare facilities will be assessed on a case-by-case basis as it is dependent on the location, the proposed development, and the existing facilities provided in the locality. Similarly, the health infrastructure required will not be the same across all proposed allocations, and therefore quantifying the requirements within the policy is not possible. These will be assessed under any forthcoming planning applications in consultation with Staffordshire and Stoke on Trent Integrated Care Board.</p> <p>The policy does not state that all residents of proposed development will be new to the area or the local healthcare facility.</p> <p>The requirements for planning obligations are set out in NPPF (December 2023) paragraph 57 and it is not therefore considered necessary to repeat these within the policy.</p>
Black Country NHS Integrated Care Board	STA24-005-01	Policy HC14	In summarising the key health impacts identified through the Policy drafting process, the ICB is of the opinion that the Draft South Staffs Local Plan makes a positive contribution to addressing the identified health issues. Policy HC14 Healthcare Infrastructure in particular is supported for recognising the connection between housing development, local population change and their potential impact on the Primary and Secondary Healthcare Network.	Not stated	Not stated	Not stated	Comments and support noted.
Marsh, J	RES24-140-02	Policy HC14	There are no provisions in these plans to provide any uplift in GP services or any other infrastructure for that matter to support	Not stated	Not stated	Not stated	Engagement throughout plan preparation has taken place with Staffordshire and Stoke on Trent



**CHAPTER 9 & POLICIES HC14-HC19: PROMOTING SUCCESSFUL AND SUSTIANBLE COMMUNITIES**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			such a population uplift				Integrated Care Board (formerly Stafford and Surrounds Clinical Commissioning Group). It is considered that Policy HC14 provides appropriate measures for obtaining financial contributions which will effectively mitigate proposed developments.
The Planning Bureau for McCarthy Stone	AGT24-033-01-04	Policy HC14	<p>Recommendation: For the plan to be in line with national policy and effective Policy HC14 should be amended so it reads as follows: "Proposals for major residential developments must be assessed against the capacity of existing healthcare facilities through..."</p> <p>In addition, the following wording should be added to the policy to recognise the health benefits of older persons housing: "Specialist Housing for older people has a number of health benefits and proposals for such schemes will not be required to submit a Health Impact Assessment".</p>	Not stated	Not stated	Not stated	<p>It is not considered appropriate to delete 'specialist elderly accommodation' from Policy HC14 as it is essential that all proposals for specialist accommodation are assessed against the existing healthcare facilities through engagement with the ICB. If the existing facilities do not have capacity to accommodate new patients, it will be expected that a proportionate financial contribution or on-site provision is made.</p> <p>Health Impact Assessments are not referenced in Policy HC15.</p>
Hancher, R	RES24-095-06	Policy HC14	The policy statement is sensible. However provision of health infrastructure (in particular access to GPs) continues to decline - with many villages such as Brewood already having insufficient capacity. It will be important that this policy is delivered before future developments, rather than leaving it until afterward when experience has shown it is unlikely to be delivered.	Not stated	Not stated	Not stated	Engagement throughout plan preparation has taken place with Staffordshire and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical Commissioning Group). It is considered that Policy HC14 provides appropriate measures for obtaining financial contributions which will effectively mitigate proposed developments. These financial contributions will be secured through a S106 agreement with the approval of a planning application and will state the trigger point for providing the contribution or infrastructure.
<b>POLICY HC15: EDUCATION</b>							
Wombourne Parish Council	STA24-052-01	Policy HC15	Questions remain as to whether the County Council's Education Authority, the Government's Education Department and individual local schools have been suitably consulted/accurately surveyed on the overall requirements for pupil provision over the plan period. Suitable provision for increased school capacity, or otherwise expressions of how increased local need may be met (for instance, alterations of catchment areas) needs to be identified as part of the Plan	Not stated	Yes	Not stated	Engagement throughout plan preparation has taken place with the School Organisation Team (SOT) at Staffordshire County Council. The impact of the proposed allocations are capable of being mitigated through financial contributions in line with Policy HC15.
Cheslyn Hay Parish Council	STA24-011-01	Policy HC15	Residents dispute that there are sufficient places for all Cheslyn Hay children and the additional pressure from housing developments would displace cheslyn hay children to other Parishes (contrary to policy HC15).	Not stated	No	Not stated	Engagement throughout plan preparation has taken place with the School Organisation Team (SOT) at Staffordshire County Council. The impact of the proposed allocations are capable of being mitigated through financial contributions in line with Policy HC15.
Staffordshire	STA24-	Policy	We note and support the inclusion of a specific Policy for	Yes	Yes	Yes	Comments noted.

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
County Council	044-01	HC15	Education and Schools in Policy HC15. We support reference in the policy to our Education Infrastructure Contributions Policy, as this sets out the methodology and mechanisms by which we work to when considering development affect education infrastructure and access to school.				No changes proposed.
Staffordshire County Council (Education)	STA24-044-18	Policy HC15	<p>The district of South Staffordshire is made up of four distinct areas for the purpose of school place planning: 1) Cheslyn Hay &amp; Great Wyrley, 2) Kinver &amp; Wombourne, 3) Codsall &amp; Perton and 4) Penkridge.</p> <p>This consultation response does not assess the impact or requirement for additional school transport, nursery or SEND provision.</p> <p>A two-tier education system, with Primary (4-11 years) and Secondary (11-18 years) schools, operates in Cheslyn Hay &amp; Great Wyrley and Kinver &amp; Wombourne, whilst in Codsall, Perton and Penkridge, a three-tier system with First (4-9 years), Middle (9-13 years) and High (13-18 years) schools, operates. Sixth form provision is offered on site at all secondary and high schools within the district.</p> <p>School sizes are referred to as Forms of Entry (FE), which are the number of classes of 30 per school year group. For example, a 2FE school would have 2 classes of 30 pupils in every year group (60 pupils per school year group).</p> <p>It should be made clear to prospective developers that where a new school is required developers must provide land for school site(s) in addition to education contributions to mitigate the development. We would seek assurance from SSDC that where a number of proposed developments in one area necessitate a new school, land would be safeguarded for education provision and that the developers contribute proportionally to the cost of buying the land.</p> <p>Full details of new school requirements in representation.</p>	Not stated	Not stated	Not stated	<p>Comments and additional information noted.</p> <p>Engagement throughout plan preparation has taken place with the School Organisation Team (SOT) at Staffordshire County Council. Policy HC15 is clear that support will be provided for the expansion or improvement of facilities or the construction of new schools to meet the demand generated by new development, this may be through financial contributions or mitigation on site.</p> <p>No changes proposed.</p>
Staffordshire County Council (Education)	STA24-044-18	Policy HC15	<p>Education contributions will be sought towards mitigating the impact of new housing developments where necessary.</p> <p>Any new first school(s) would need to be at least 1FE (150 places) plus nursery provision and would require land of 7,635m2 to be provided and allocated within the local plan to facilitate this. To deliver a new 1FE First School (150 places + nursery provision) would cost in the region of £6.2 million pounds (as at Q2-2022). A 2FE First School (300 places + nursery provision) would require land of 12,870m2 to be provided and allocated within the local plan to facilitate this and would cost in the region of £8.2 million pounds (as at Q2-2022).</p> <p>Any new primary schools would need to be at least 1FE (210 places) plus nursery provision and require land of 11,415m2 to be provided and allocated within the local plan to facilitate this.</p> <p>To deliver a new 1FE Primary School (210 places + nursery provision) would cost in the region of £7.6 million pounds (as at Q2-2022). A 2FE Primary School (420 places + nursery</p>	Not stated	Not stated	Not stated	<p>Comments and additional information noted.</p> <p>Engagement throughout plan preparation has taken place with the School Organisation Team (SOT) at Staffordshire County Council. Policy HC15 is clear that support will be provided for the expansion or improvement of facilities or the construction of new schools to meet the demand generated by new development, this may be through financial contributions or mitigation on site.</p> <p>No changes proposed.</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			provision) would require land of 20,430m2 to be provided and allocated within the local plan to facilitate this and would cost in the region of £11.4 million pounds (as at Q2-2022). Any new secondary schools would need to be at least 5FE (750 places) and require land of 86,076m2 to be provided and allocated within the local plan to facilitate this. To deliver a new secondary school of 5FE would cost in the region of £26.6 million pounds (as at Q2-2022).				
Staffordshire County Council (Education)	STA24-044-18	Policy HC15	<p>Proposed Housing Growth – Locality 1 Penkridge Town There are 1,297 dwellings proposed in Penkridge as part of the updated Local Plan. This number of new homes is likely to generate 195 First school aged pupils, 156 at Middle school pupils, 117 at High school pupils and 39 pupils in sixth form. Penkridge operates a three tier education system and contains three first schools, one middle school and one high school; the high school serves Penkridge Centre and the wider rural area. To fully mitigate the proposed new housing further educational infrastructure would be required. We note that 1.5 hectares of land has been allocated for a new 1.5FE First School (225 places + nursery provision) which is of a sufficient size and other land requirements are detailed above. Education contributions will also need to be secured for the cost of the school building which is in the region of £6.7 million pounds (as at Q2-2022). Penkridge Middle School and Wolgarston High School would both require up to 1FE of additional school infrastructure to mitigate the impact of the proposed developments (an additional 120 and 90 places respectively). Southern Edge of Stafford – (A34 corridor) There are 81 dwellings proposed in the Southern edge of Stafford as part of the updated Local Plan. This number of new homes is likely to generate 17 Primary school aged pupils, 12 Secondary School pupils and 2 pupils in sixth form. Huntington There are 39 dwellings proposed in Huntington as part of the updated Local Plan. This number of new homes is likely to generate 8 Primary school aged pupils, 6 at Secondary School pupils and 1 pupil in sixth form.</p>	Not stated	Not stated	Not stated	<p>Comments and additional information noted.</p> <p>Engagement throughout plan preparation has taken place with the School Organisation Team (SOT) at Staffordshire County Council. Policy HC15 is clear that support will be provided for the expansion or improvement of facilities or the construction of new schools to meet the demand generated by new development, this may be through financial contributions or mitigation on site.</p> <p>No changes proposed.</p>
Staffordshire County Council (Education)	STA24-044-18	Policy HC15	<p>Proposed Housing Growth – Locality 2 Brewood There are 63 dwellings proposed in Brewood as part of the updated Local Plan. This number of new homes is likely to generate 9 First school aged pupils, 8 at Middle school pupils, 6 at High School pupils and 2 pupils in sixth form. Coven</p>	Not stated	Not stated	Not stated	<p>Comments and additional information noted.</p> <p>Engagement throughout plan preparation has taken place with the School Organisation Team (SOT) at Staffordshire County Council. Policy HC15 is clear that support will be provided for the expansion or improvement of facilities or the construction of new schools to meet the demand</p>

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			<p>There are 48 dwellings proposed in Coven as part of the updated Local Plan. This number of new homes is likely to generate 7 First school aged pupils, 6 at Middle school pupils, 4 at High School pupils and 1 pupil in sixth form.</p> <p>Wheaton Aston There are 18 dwellings proposed in Wheaton Aston as part of the updated Local Plan. This number of new homes is likely to generate 3 First school aged pupils, 2 at Middle school pupils, 2 at High School pupils and 1 pupil in sixth form.</p>				<p>generated by new development, this may be through financial contributions or mitigation on site.</p> <p>No changes proposed.</p>
Staffordshire County Council (Education)	STA24-044-18	Policy HC15	<p>Proposed Housing Growth – Locality 3 Cheslyn Hay/Great Wyrley There are 499 dwellings proposed in Cheslyn Hay &amp; Great Wyrley as part of the updated Local Plan. This number of new homes is likely to generate 105 Primary school aged pupils, 75 at Secondary School pupils and 15 pupils in sixth form.</p> <p>Featherstone There are 35 dwellings proposed in Featherstone as part of the updated Local Plan. This number of new homes is likely to generate 7 Primary school aged pupils, 5 at Secondary School pupils and 1 pupil in sixth form.</p>	Not stated	Not stated	Not stated	<p>Comments and additional information noted.</p> <p>Engagement throughout plan preparation has taken place with the School Organisation Team (SOT) at Staffordshire County Council. Policy HC15 is clear that support will be provided for the expansion or improvement of facilities or the construction of new schools to meet the demand generated by new development, this may be through financial contributions or mitigation on site.</p> <p>No changes proposed.</p>
Staffordshire County Council (Education)	STA24-044-18	Policy HC15	<p>Proposed Housing Growth – Locality 4 Codsall/Bilbrook There are 1194 dwellings proposed in Codsall &amp; Bilbrook as part of the updated Local Plan. This number of new homes is likely to generate 179 First school aged pupils, 143 at Middle school pupils, 107 at High School pupils and 36 pupils in sixth form. To fully mitigate the proposed new housing further educational infrastructure would be required. We note that 1.3 hectares of land has been allocated for a new 2FE First School (300 places + nursery provision) which is of a sufficient size and other land requirements are detailed above. Education contributions will also need to be secured for the cost of the school building which is in the region of £8.2 million pounds (as at Q2-2022). It is likely that the proposed developments can be accommodated within the existing middle school infrastructure within Codsall/Bilbrook however dependent on the timing, phasing and dwelling breakdown of the housing developments education contributions may be necessary.</p> <p>Perton There are 150 dwellings proposed in Perton as part of the updated Local Plan. This number of new homes is likely to generate 23 First school aged pupils, 18 at Middle school pupils, 14 at High School pupils and 5 pupils in sixth form.</p>	Not stated	Not stated	Not stated	<p>Comments and additional information noted.</p> <p>Engagement throughout plan preparation has taken place with the School Organisation Team (SOT) at Staffordshire County Council. Policy HC15 is clear that support will be provided for the expansion or improvement of facilities or the construction of new schools to meet the demand generated by new development, this may be through financial contributions or mitigation on site.</p> <p>No changes proposed.</p>

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			<p>Codsall High School would require additional school infrastructure to mitigate the cumulative impact of the proposed developments within the school's catchment in Codsall/Bilbrook, Perton and Pattingham. Therefore, education contributions will be required to make these developments acceptable in planning terms.</p> <p>Pattingham There are 17 dwellings proposed in Pattingham as part of the updated Local Plan. This number of new homes is likely to generate 3 First school aged pupils, 2 at Middle school pupils, 2 at High School pupils and 1 pupil in sixth form.</p>				
Staffordshire County Council (Education)	STA24-044-18	Policy HC15	<p>Proposed Housing Growth – Locality 5 Wombourne There are 280 dwellings proposed in Wombourne as part of the updated Local Plan. This number of new homes is likely to generate 59 Primary school aged pupils, 42 at Secondary School pupils and 8 pupils in sixth form. Kinver There are 120 dwellings proposed in Kinver as part of the updated Local Plan. This number of new homes is likely to generate 25 Primary school aged pupils, 18 at Secondary School pupils and 5 pupils in sixth form. Swindon There are 10 dwellings proposed in Swindon as part of the updated Local Plan. This number of new homes is likely to generate 2 Primary school aged pupils, 2 at Secondary School pupils. Proposed Housing Growth – Tier 4 villages/other settlements/tier 5 settlements/windfall sites There are 824 dwellings proposed for Tier 4 villages/other settlements/tier 5 settlements/windfall sites as part of the updated Local Plan. Dependent on location a total of 124 first school places, 173 primary school places, 99 middle school places, 124 secondary school places, 74 high school places and 25 post 16 places are required.</p>	Not stated	Not stated	Not stated	<p>Comments and additional information noted.</p> <p>Engagement throughout plan preparation has taken place with the School Organisation Team (SOT) at Staffordshire County Council. Policy HC15 is clear that support will be provided for the expansion or improvement of facilities or the construction of new schools to meet the demand generated by new development, this may be through financial contributions or mitigation on site.</p> <p>No changes proposed.</p>
Avison Young for Crest Nicholson	AGT24-004-02-03	Policy HC15	Should make specific reference to the CIL Regulation 122 tests for planning obligations to ensure that any requests for financial contributions towards infrastructure are appropriately justified, lawful and comply with national policy.	Yes	No	Not stated	The requirements for planning obligations are set out in NPPF (December 2023) paragraph 57 and it is not therefore considered necessary to repeat these within the policy.
Robson, A	RES24-200-01	Policy HC15	Schools are heavily oversubscribed, so there is an impact on parking, environment, green spaces.	Not stated	No	Not stated	Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies. Engagement throughout plan



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							preparation has taken place with Local Highways Authority, School Organisation Team (SOT) (both Staffordshire County Council), and Staffordshire and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical Commissioning Group). None of which have indicated that the impact of the proposed development would have significant or unmitigable impacts on their respective infrastructure responsibilities, or addressed through proposed Policies HC14, and HC15.
Avison Young for Beard, G	AGT24-004-01-02	Policy HC15	Our client supports the policy as drafted.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. 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.	No	No	No	Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.
RCA Regeneration for Barberry Developments	AGT24-035-01-02	Policy HC15	We recognise the importance of supporting infrastructure. It is true that the provision of housing contributes significantly to such supporting infrastructure via Section 106 agreements.	No	No	No	Comments noted.  No changes proposed.
RCA Regeneration for Seven Capital	AGT24-035-03-02	Policy HC15	We recognise the importance of supporting infrastructure. It is true that the provision of housing contributes significantly to such supporting infrastructure via Section 106 agreements.	Not stated	No	No	Comments noted.  No changes proposed.
Evolve Planning & Design for Bloor Homes	AGT24-017-01-09	Policy HC15	Land East of Bilbrook - Bloor Homes supports HC15 in respect of education infrastructure which appears to represent a continuation of the current approach.	Not stated	Not stated	Not stated	Comments noted.  No changes proposed.
Marrons Planning for Boningale Homes	AGT24-027-02-01	Policy HC15	Boningale Homes support the recognition that strategic development opportunities are capable of delivering much needed infrastructure, including modern, state-of-the-art education facilities. It is widely recognised, that without the development sector delivering such infrastructure, it is unlikely that communities across the country would benefit from new and additional education capacity. The provision of new education facilities, as part of a planning application should carry substantial weight, and furthermore, in line with our submissions relating to the need to identify additional dwellings over the emerging Plan period, the Council should prioritise the allocation of land which provides such infrastructure, such as the proposed development at Codsall South which will deliver land for a new Primary School.	Not stated	Not stated	Not stated	Comments noted.  Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.  No changes proposed.
Pegasus Group for Richborough Estates	AGT24-030-05-02	Policy HC15	Richborough broadly supports the policy but it makes a blanket assumption that new education infrastructure will be required from all new development. The policy text requires further clarification as any such provision to be delivered by a S106 must have regard to the tests of CIL Regulation 122, the policy	Yes	No	Yes	The text within Policy HC15, and the supporting paragraphs, make it clear that improvements to existing education facilities, or new infrastructure, will be required where population growth from a proposed development warrant

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			should make this explicit. The policy is unsound as it is neither justified not consistent with national policy.				<p>this. Any new infrastructure will be in line with the Staffordshire Education Infrastructure Contributions Policy. It is not considered that Policy HC15 makes a blanket assumption that new education infrastructure will be required with every new development in the district.</p> <p>The requirements for planning obligations are set out in NPPF (December 2023) paragraph 57 and it is not therefore considered necessary to repeat these within the policy.</p>
Pegasus Group for Clowes Developments	AGT24-030-02-02	Policy HC15	Clowes broadly supports the policy but it makes a blanket assumption that new education infrastructure will be required from all new development. The policy text requires further clarification as any such provision to be delivered by a S106 must have regard to the tests of CIL Regulation 122, the policy should make this explicit. The policy is unsound as it is neither justified not consistent with national policy.	Not stated	No	No	<p>The text within Policy HC15, and the supporting paragraphs, make it clear that improvements to existing education facilities, or new infrastructure, will be required where population growth from a proposed development warrant this. Any new infrastructure will be in line with the Staffordshire Education Infrastructure Contributions Policy. It is not considered that Policy HC15 makes a blanket assumption that new education infrastructure will be required with every new development in the district.</p> <p>The requirements for planning obligations are set out in NPPF (December 2023) paragraph 57 and it is not therefore considered necessary to repeat these within the policy.</p>
Pegasus Group for Persimmon Homes	AGT24-030-04-01	Policy HC15	The policy requires further clarification to ensure that any such provision to be delivered via a S106 agreement has regard to the tests of CIL Regulations rather than referring to Staffordshire Education Infrastructure Contributions Policy. The policy should also recognise new infrastructure will be required from new development, only where it can be demonstrated that existing capacity to accommodate growth does not exist. The policy is considered unsound as it is neither justified nor consistent with national policy.	Not stated	No	Not stated	<p>The text within Policy HC15, and the supporting paragraphs, make it clear that improvements to existing education facilities, or new infrastructure, will be required where population growth from a proposed development warrant this. Any new infrastructure will be in line with the Staffordshire Education Infrastructure Contributions Policy. It is not considered that Policy HC15 makes a blanket assumption that new education infrastructure will be required with every new development in the district.</p> <p>The requirements for planning obligations are set out in NPPF (December 2023) paragraph 57 and it is not therefore considered necessary to repeat these within the policy.</p>
Pegasus Group for Taylor Wimpey	AGT24-030-08-02	Policy HC15	Taylor Wimpey broadly supports the policy but it makes a blanket assumption that new education infrastructure will be required from all new development. The policy text requires	Not stated	No	Not stated	<p>The text within Policy HC15, and the supporting paragraphs, make it clear that improvements to existing education facilities, or new</p>

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			further clarification as any such provision to be delivered by a S106 must have regard to the tests of CIL Regulation 122, the policy should make this explicit. The policy is unsound as it is neither justified not consistent with national policy.				infrastructure, will be required where population growth from a proposed development warrant this. Any new infrastructure will be in line with the Staffordshire Education Infrastructure Contributions Policy. It is not considered that Policy HC15 makes a blanket assumption that new education infrastructure will be required with every new development in the district.  The requirements for planning obligations are set out in NPPF (December 2023) paragraph 57 and it is not therefore considered necessary to repeat these within the policy.
Holyhead, P & S	RES24-112-01	Policy HC15	Site 036c The plan is not legally compliant as it doesnt comply with the NPPF in terms of its policy on education provision. 'It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education'. This has clearly not been met since all surrounding schools are full. SSDC's consultants listen education as a major positive of the site, but this is not true as all the local schools are full.-Plan doesnt comply with duty to cooperate with SBC	No	No	No	Engagement throughout plan preparation has taken place with the School Organisation Team (SOT) at Staffordshire County Council. They have not indicated that the impact of the proposed allocation is incapable of being mitigated through financial contributions in line with Policy HC15.  No change proposed.
Monnox, D	RES24-151-03	Policy HC15	It is very clear, from previous representations to the Council, that the residents of Wildwood have significant concerns regarding the ability of the schools and health facilities to cater for an increased demand that will result from this housing proposal. The schools and health facilities are already oversubscribed. The increase in traffic, on roads that are already congested, with resulting air pollution is also a local concern. The increase in traffic on Acton Hill Road and through the Parish is a major concern. These concerns have not been fully considered when the site was allocated.	No	No	No	Engagement throughout plan preparation has taken place with the School Organisation Team (SOT) at Staffordshire County Council. They have not indicated that the impact of the proposed allocation is incapable of being mitigated through financial contributions in line with Policy HC15.  Engagement throughout plan preparation has taken place with Staffordshire and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical Commissioning Group). They have not indicated that the impact of the proposed allocation is incapable of being mitigated through financial contributions in line with Policy HC14.  The impact upon air quality from development on designated sites has been considered by partner authorities that has incorporated assessments of the predicted growth in vehicular movements across all site allocations. This includes cumulative impacts. Furthermore, there is only

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							<p>one Air Quality Management Area (AQMA) in the district which is located along the A5 between M6 J12 and Cannock (AQMA No.5 Oak Farm) where there are no allocations proposed.</p> <p>Engagement throughout plan preparation has taken place with Local Highways Authority (Staffordshire County Council). They have not indicated that the impact of the proposed allocation would not generate any significant impacts on the transport network or highway safety that cannot be mitigated in line with paragraph 114 d of the NPPF.</p>
Windsor, R	RES24-255-05	Policy HC15	<p>Site 036c, in relation to Policy HC15 - Education</p> <p>The above policy assumes that school places would be available within Stafford Borough Council to accommodate site 036c. Local schools are full, so will have to be bussed elsewhere.</p> <p>Highlights the lack of duty to co-operate with Stafford Borough Council.</p> <p>Site 036c should be deleted from the plan.</p>	Not stated	No	No	<p>Engagement throughout plan preparation has taken place with the School Organisation Team (SOT) at Staffordshire County Council. They have not indicated that the impact of the proposed allocation is incapable of being mitigated through financial contributions in line with Policy HC15.</p> <p>Stafford Borough Council (SBC) and SSDC have an agreed SoCG that addresses Duty to Cooperate matters effectively that both parties consider to be sound and lawful as set out in the Duty to Cooperate Topic Paper 2024.</p> <p>No change proposed.</p>
Monnox, P	RES24-152-03	Policy HC15	<p>It is very clear, from previous representations to the Council, that the residents of Wildwood have significant concerns regarding the ability of the schools and health facilities to cater for an increased demand that will result from this housing proposal. The schools and health facilities are already oversubscribed in Wildwood, Weeping Cross and Baswich. The increase in traffic, on roads that are already congested, with resulting air pollution is also a local concern. The increase in traffic on Acton Hill Road and through the Parish is a major concern. These concerns have not been fully considered when the site was allocated.</p>	No	No	No	<p>Engagement throughout plan preparation has taken place with the School Organisation Team (SOT) at Staffordshire County Council. They have not indicated that the impact of the proposed allocation is incapable of being mitigated through financial contributions in line with Policy HC15.</p> <p>Engagement throughout plan preparation has taken place with Staffordshire and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical Commissioning Group). They have not indicated that the impact of the proposed allocation is incapable of being mitigated through financial contributions in line with Policy HC14.</p> <p>The impact upon air quality from development on designated sites has been considered by partner authorities that has incorporated assessments of</p>

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							<p>the predicted growth in vehicular movements across all site allocations. This includes cumulative impacts. Furthermore, there is only one Air Quality Management Area (AQMA) in the district which is located along the A5 between M6 J12 and Cannock (AQMA No.5 Oak Farm) where there are no allocations proposed.</p> <p>Engagement throughout plan preparation has taken place with Local Highways Authority (Staffordshire County Council). They have not indicated that the impact of the proposed allocation would not generate any significant impacts on the transport network or highway safety that cannot be mitigated in line with paragraph 114 d of the NPPF.</p>
<b>POLICY HC16: SOUTH STAFFORDSHIRE COLLEGE</b>							
Carter Jonas for South Staffordshire College	AGT24-008-02-01	Policy HC16	<p>Support the overarching principle of including a specific planning policy in relation to future development at South Staffordshire College. However, we do not consider criterion d meets the test of soundness.</p> <p>Criterion d has been amended to no longer support the demolition of buildings and instead focuses on the re-use only. There are instances whereby demolition is the most appropriate course of action. The previous policy caveated the support for demolition to only be allowed 'where appropriate' and therefore sufficient justification would need to be submitted in support of a planning application which comprised the demolition of any building. We are not aware of any justification or changes to the evidence base which supports the revised wording removing the support for appropriate demolition.</p> <p>Accordingly, to ensure the policy is justified by being based on a proportionate evidence base, we request that criterion d is worded as follows to support both demolition and re-use;</p> <p>"where appropriate, re-use of existing buildings for uses which support the existing uses at South Staffordshire College or the existing buildings that are surplus to requirements are demolished".</p>	Not stated	No	Not stated	<p>Following the representation made by South Staffordshire College during the 2022 Regulation 19 consultation, the wording of criterion d was amended to include "where appropriate" as requested.</p> <p>No changes proposed.</p>
<b>POLICY HC17: OPEN SPACE</b>							
Kinver Parish Council	STA24-025-07	Policy HC17	We are concerned that the provision of open space in new developments should be on-site, since contributions for off-site facilities are unlikely to be sufficient to purchase land and create such facilities, nor is there normally appropriate space available	Not stated	Not stated	Not stated	There is a clear steer within the policy that Public Open Space on sites of 33 dwellings and above should be provided on-site as part of the development scheme. Evidence suggests that



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			in the immediate vicinity of developments. Any offsite provision will therefore be inaccessible to the new communities created, and inadequate.				provision on smaller sites would not be of a sufficient scale to provide functional open space to meaningfully meet requirements.  With respect to play provision the policy retains a measure of flexibility to enable developers to devise an alternative play provision strategy, though any measures proposed in such a strategy would need to be satisfactory to the council. No Change.
Goldfinch Town Planning Services	AGT24-020-01-01	Policy HC17	This is a poorly written policy and will therefore provide an ineffective Development Management policy to protect sensitive open space areas. Similar to issues facing the Black Country Council Planning Policy Teams of Wolverhampton, Dudley, Sandwell and Walsall, South Staffordshire District Council does not appear to have any specialist in-house green space planning policy expertise. This will play into the hands of private sector housing developers and private sector planning consultants who will be able to exploit this situation at the DM planning application stage, and during Local Plan Review various Reg 18 preparation stages. As well as the Reg 19 Local Plan. preparation stage. Goldfinch Town Planning Services continues to be very disappointed and concerned given that the above LPA's no longer seem to value specialist green space planning policy expertise. This is letting down local communities and failing to promote climate change resilience within their areas, and making sensitive natural green space areas and outdoor recreational areas more vulnerable to future development pressures. It also means that specialist technical evidence base documents such as paragraph 102 NPPF (December 2023) compliant Green Space Audits (Open Space Needs Assessments) can no longer be prepared in-house.	No	No	No	No clear indication given as to why the policy is considered poorly written or ineffective.  The District Council believes that the policy clearly identifies the scale and quality of public open space which will be expected, and the open space should be multi-functional and located so as to maximise utility. No change.
Penkridge Parish Council	STA24-036-01	Policy HC17	The Neighbourhood Plan review policy for the provision has been changed. The open space requirements have been reduced to 0.006ha from 0.01ha per dwelling. This effectively nearly halves the provision of amenity and usable open space and green spaces throughout all the new estates. It will also have the potential of the increase the density of the proposed housing delivery. It will certainly have the effect of reducing the openness of the future housing estates. The Local Plan review does not take seriously the opportunity to allocate the river flood plain areas as new open space/ parkland from the north – toward the Village centre connecting the previous River Park on the Teddesley Road/The Roller Mill in 2001. And to the west to Cuttlestone Bridge on Pinfold Lane.	Not stated	Not stated	Not stated	The level of open space requirement has been evidenced in an Open Space Standards strategy produced by KKP and is focussed solely on the delivery of meaningful and functional public open space which it is envisaged will also contribute in a qualitative way to housing scheme lay out. The inclusion of incidental space was excluded from this requirement and if reintroduced would require a higher policy standard.  Policy SA2 identifies land to the north of Penkridge as a strategic development location. This policy identifies a riverside linear community park to be delivered to support the housing growth in this location.  No change proposed.

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
First City for St Mary's Presbytery and The Archdiocese of Birmingham	AGT24-018-01-12	Policy HC17	<p>Whilst there is no in principle objection to the requirements of the policy or the provision of open space within developments, some clarifications are required in order to ensure that the Policy is sound.</p> <p>The policy requirement for on-site equipped play provision as default is not supported as it will not be appropriate for every site, for example where there is already high-quality equipped play provision in the locality it would not make sense to duplicate this provision.</p> <p>Open space should be located in places on sites which are deemed suitable by the applicant as a result of taking into consideration differences in the sites opportunities and constraints.</p> <p>All areas of incidental green space should be considered as part of the open space as it will contribute to biodiversity, climate change mitigation. It is requested that the Council amend the policy to allow a more flexible approach to achieve the right design solution for each site.</p>	Not stated	Not stated	Not stated	<p>The policy provides an element of flexibility for developers to enter into an alternative play provision strategy where appropriate. The requirement that by default provision should be on-site is considered to offer the clearest guarantee that equipped play provision will be readily accessible to the residents of new development sites.</p> <p>It is considered appropriate that the policy should seek to set standards as to how public open space is provided and this includes specifying that public open space provision be located where it is readily accessible and where there is the potential for the use of the space to be maximised.</p> <p>The level of open space requirement has been evidenced in an Open Space Standards strategy produced by KKP and is focussed solely on the delivery of meaningful and functional public open space which it is envisaged will also contribute in a qualitative way to housing scheme lay out. The inclusion of incidental space was excluded from this requirement and if reintroduced would require a higher policy standard.</p> <p>No change proposed.</p>
Avison Young for Crest Nicholson	AGT24-004-02-03	Policy HC17	<p>This policy should be amended should allow for equipped play provision off site in circumstances where there is existing public open space or play facilities available on public open space within walking distance of the site that would benefit from either: i) new equipped play provision; or ii) the expansion and/or improvement of existing play equipment through financial contributions.</p>	Yes	No	Not stated	<p>The policy provides an element of flexibility for developers to enter into an alternative play provision strategy where appropriate. The requirement that by default provision should be on-site is considered to offer the clearest guarantee that equipped play provision will be readily accessible to the residents of new development sites.</p> <p>No change proposed.</p>
Advance Land & Planning for Stephens, M	AGT24-002-03-01	Policy HC17	<p>We support the proposed open space requirement of 0.006ha per dwelling, although we consider that there should be some flexibility as to whether on-site open space on sites of 33 dwellings or above should include equipped play provision, especially where good quality provision is accessible nearby.</p>	Not stated	Not stated	Not stated	<p>The policy provides an element of flexibility for developers to enter into an alternative play provision strategy where appropriate. The requirement that by default provision should be on-site is considered to offer the clearest guarantee that equipped play provision will be readily accessible to the residents of new development sites.</p> <p>No change proposed.</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
RCA Regeneration for Barberrry Developments	AGT24-035-01-02	Policy HC17	We recognise the importance of supporting infrastructure. It is true that the provision of housing contributes significantly to such supporting infrastructure via Section 106 agreements.	No	No	No	Comment noted. No change proposed.
RCA Regeneration for Seven Capital	AGT24-035-03-02	Policy HC17	We recognise the importance of supporting infrastructure. It is true that the provision of housing contributes significantly to such supporting infrastructure via Section 106 agreements.	Not stated	No	No	Comment noted. No change proposed.
Evolve Planning & Design for Lovell Homes	AGT24-017-05-01	Policy HC17	Concern is raised that the emerging requirements appear to provide no flexibility with regards to a site's context. Accessibility standards should be established through the Local Plan to provide certainty and not displaced to supplementary guidance which is not intended to establish policy.	Yes	No	Yes	<p>Policy requirements are based on the findings of an open space standards strategy as produced by KKP and the district council consider it to be well evidenced and appropriate.</p> <p>The policy provides an element of flexibility for developers to enter into an alternative play provision strategy where appropriate. The requirement that by default provision should be on-site is considered to offer the clearest guarantee that equipped play provision will be readily accessible to the residents of new development sites.</p> <p>The general principle regarding onsite accessibility is addressed in policy by the requirement that public open space provision associated with new development schemes should be situated in locations accessible to all and where there is the potential for its use to be maximised.</p> <p>No change proposed.</p>
Evolve Planning & Design for Keon Homes	AGT24-017-04-01	Policy HC17	Concern is raised that the emerging requirements appear to provide no flexibility with regards to a site's context. Accessibility standards should be established through the Local Plan to provide certainty and not displaced to supplementary guidance which is not intended to establish policy.	Yes	No	Yes	<p>Policy requirements are based on the findings of an open space standards strategy as produced by KKP and the district council consider it to be well evidenced and appropriate.</p> <p>The policy provides an element of flexibility for developers to enter into an alternative play provision strategy where appropriate. The requirement that by default provision should be on-site is considered to offer the clearest guarantee that equipped play provision will be readily accessible to the residents of new development sites.</p> <p>The issue of onsite accessibility is addressed in policy by the requirement that public open space provision associated with new development schemes should be situated in locations accessible to all and where there is the potential</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							for its use to be maximised.  No change proposed.
Evolve Planning & Design for Four Ashes Road Ltd	AGT24-017-03-01	Policy HC17	Concern is raised that the emerging requirements appear to provide no flexibility with regards to a site's context. Accessibility standards should be established through the Local Plan to provide certainty and not displaced to supplementary guidance which is not intended to establish policy.	Yes	No	Yes	<p>Policy requirements are based on the findings of an open space standards strategy as produced by KKP and the district council consider it to be well evidenced and appropriate.</p> <p>The policy provides an element of flexibility for developers to enter into an alternative play provision strategy where appropriate. The requirement that this should by default be provided on-site is considered to offer the best guarantee that equipped play provision will be readily accessible to the residents of new development sites.</p> <p>The general principles regarding site accessibility is addressed in policy by the requirement that public open space provision associated with new development schemes should be situated in locations accessible to all and where there is the potential for its use to be maximised.</p> <p>No change proposed.</p>
Evolve Planning & Design for Cameron Homes	AGT24-017-02-01	Policy HC17	Concern is raised that the emerging requirements appear to provide no flexibility with regards to a site's context. Accessibility standards should be established through the Local Plan to provide certainty and not displaced to supplementary guidance which is not intended to establish policy.	Yes	No	Yes	<p>Policy requirements are based on the findings of an open space standards strategy as produced by KKP and the district council consider it to be well evidenced and appropriate.</p> <p>The policy provides an element of flexibility for developers to enter into an alternative play provision strategy where appropriate. The requirement that by default provision should be on-site is considered to offer the clearest guarantee that equipped play provision will be readily accessible to the residents of new development sites.</p> <p>The general principles of site accessibility is addressed in policy by the requirement that public open space provision associated with new development schemes should be situated in locations accessible to all and where there is the potential for its use to be maximised.</p> <p>No change proposed.</p>
Evolve Planning &	AGT24-	Policy	Concern is raised that the emerging requirements appear to	Yes	No	Yes	Policy requirements are based on the findings of

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
Design for Bloor Homes	017-01-09	HC17	provide no flexibility with regards to a site's context. Accessibility standards should be established through the Local Plan to provide certainty and not displaced to supplementary guidance which is not intended to establish policy.				<p>an open space standards strategy as produced by KKP and the district council consider it to be well evidenced and appropriate.</p> <p>The policy provides an element of flexibility for developers to enter into an alternative play provision strategy where appropriate. The requirement that by default provision should be on-site is considered to offer the clearest guarantee that equipped play provision will be readily accessible to the residents of new development sites.</p> <p>The general issue of site accessibility is addressed in policy by the requirement that public open space provision associated with new development schemes should be situated in locations accessible to all and where there is the potential for its use to be maximised.</p> <p>No change proposed.</p>
Savills UK Ltd for Clowes Developments	AGT24-037-02-07	Policy HC17	Clowes objects to HC17 as written because it is not effective or justified. No definition of what constitutes 'small' is provided or how applicants can demonstrate that it serves a purpose. SSDC has also not provided any information to justify why small areas of green infrastructure will not be regarded as part of the open space provision. These areas may not always be 'useable' from a recreation perspective but they can still provide visual benefits for residents and place-making. Policy HC17 should be amended to remove reference to smaller areas of incidental green infrastructure not forming part of the on-site open space standard as it is too restrictive.	Yes	No	Yes	<p>The level of open space requirement has been evidenced in an Open Space Standards strategy produced by KKP and is focussed solely on the delivery of meaningful and functional public open space which it is envisaged will also contribute in a qualitative way to housing scheme lay out. The inclusion of incidental space was excluded from this requirement and if reintroduced would require a higher policy standard.</p> <p><b>Minor modification 021: Smaller areas of Incidental green infrastructure without...</b></p>
Savills UK Ltd for Taylor Wimpey	AGT24-037-05-05	Policy HC17	Concern is raised that the emerging requirements appear to provide no flexibility with regards to a site's context. Distance/accessibility isochrones are not identified within the policy for different open space typologies such as LEAPs and LAPs to ensure open space infrastructure and are presumably left to a future Open Space, Sport and Recreation SPD.	Not stated	No	Not stated	<p>The policy provides an element of flexibility for developers to enter into an alternative play provision strategy where appropriate. The requirement that by default provision should be on-site is considered to offer the clearest guarantee that equipped play provision will be readily accessible to the residents of new development sites.</p> <p>Accessibility in principle is addressed in the policy with open space being required to be located so as to maximise use. Requirements in terms of LEAPs and LAPs will be addressed through the forthcoming SPD.</p>
Turley Associates	AGT24-	Policy	Please refer to our previous representations made in December	No	No	No	Support noted.



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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
for Bellway Homes	041-01-02	HC17	2022 on this matter at Appendix 1. 2022 Rep – the approach of this policy is welcomed.				No change proposed.
First City Ltd for UKPI Ltd	AGT24-018-02-10	Policy HC17	<p>Whilst there is no in principle objection to the requirements of the policy or the provision of open space within developments, some clarifications are required in order to ensure that the Policy is sound.</p> <p>The policy requirement for on-site equipped play provision as a default is not supported as it will not be appropriate for every site, for example where there is already high-quality equipped play provision in the locality it would not make sense to duplicate this provision.</p> <p>Open space should be located in places on sites which are deemed suitable by the applicant as a result of taking into consideration differences in the sites opportunities and constraints.</p> <p>Open space policy and the requirements of the site should work in accordance with other proposed policies and should take into consideration biodiversity net gain requirements.</p> <p>All areas of incidental green space should be considered as part of the open space as it will contribute to biodiversity, climate change mitigation and improved landscaping which will contribute to a positive design and improved appearance of the overall scheme and therefore should not be disregarded.</p> <p>It is requested that the Council amend the policy to allow a more flexible approach to achieve the right design solution for each site.</p>	Not stated	Not stated	Not stated	<p>The policy provides an element of flexibility for developers to enter into an alternative play provision strategy where appropriate. The requirement that by default provision should be on-site is considered to offer the clearest guarantee that equipped play provision will be readily accessible to the residents of new development sites.</p> <p>It is considered appropriate that the policy should seek to set standards as to how public open space is provided and this includes specifying that public open space provision be located where it is readily accessible and where there is the potential for the use of the space to be maximised.</p> <p>The level of open space requirement has been evidenced in an Open Space Standards strategy produced by KKP and is focussed solely on the delivery of meaningful and functional public open space which it is envisaged will also contribute in a qualitative way to housing scheme lay out. The inclusion of incidental space was excluded from this requirement and if reintroduced would require a higher policy standard.</p> <p>No change proposed.</p>
Lloyd, K	RES24-136-12	Policy HC17	Bilbrook is striving to be a pesticide free village and we want to see the wishes of the community respected. Any maintenance of open spaces should use natural vegetation control methods and not use any chemicals, especially glyphosate. This is not the case currently on Bilbrook Mill development, where large areas have been sprayed with pesticide which is dangerous (probably carcinogenic) to wildlife, pets and people.	Not stated	Not stated	Not stated	<p>Concern is noted, this is a detailed matter related to the maintenance regime undertaken once the site has been developed.</p> <p>Potential for this to be referenced as an aim in the Open Space, Sport and Recreation SPD or Bilbrook Neighbourhood Plan.</p> <p>No change proposed.</p>
Grade Planning	AGT24-021-01-04	Policy HC17	The policy wording should be amended to state that 'a reduction in the required on-site open space provision may be acceptable where there is existing public open space immediately adjacent to the site' to allow for a reduction in the required on-site open space provision where there is existing public open space immediately adjacent to the site. This is so that an appropriate balance is achieved between the provision of open space and efficient use of land.	Yes	Yes	Yes	The policy provides an element of flexibility for developers to enter into an alternative play provision strategy where appropriate. The requirement that by default provision should be on-site is considered to offer the clearest guarantee that equipped play provision will be readily accessible to the residents of new development sites.

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							No change proposed.
Pegasus Group for Richborough Estates	AGT24-030-05-02	Policy HC17	Whilst there is no in principle objection to the requirements of the policy or the provision of open space within developments, some clarifications are required to make the policy sound. The requirement for on-site equipped play provision as default is not supported as it will not be appropriate for every site (e.g. duplication of high-quality equipped play). The provision of open space under HC17 will place further constraints on development and questions the ability to deliver sufficient homes across the Plan period.	Yes	No	Yes	The policy provides an element of flexibility for developers to enter into an alternative play provision strategy where appropriate. The requirement that by default provision should be on-site is considered to offer the clearest guarantee that equipped play provision will be readily accessible to the residents of new development sites.  No change proposed.
Pegasus Group for Richborough Estates	AGT24-030-05-02	Policy HC17	The focus of Green Infrastructure provision should be based on quality rather than quantity. The policy text cites landscape buffers as an example of incidental GI which may be excluded – this is not appropriate as landscape buffers can be of a significant size and clearly contribute towards open space provision on site. The overly prescriptive wording of the policy should be revisited to ensure the policy takes a more flexible approach to open space provision. The policy is unsound as it is neither justified not consistent with national policy.	Yes	No	Yes	The level of open space requirement has been evidenced in an Open Space Standards strategy produced by KKP and is focussed solely on the delivery of meaningful and functional public open space which it is envisaged will also contribute in a qualitative way to housing scheme lay out. The inclusion of incidental space was excluded from this requirement and if reintroduced would require a higher policy standard.  The policy provides an element of flexibility for developers to enter into an alternative play provision strategy where appropriate. The requirement that by default provision should be on-site is considered to offer the clearest guarantee that equipped play provision will be readily accessible to the residents of new development sites.  No change proposed.
Pegasus Group for Clowes Developments	AGT24-030-02-02	Policy HC17	Whilst there is no in principle objection to the requirements of the policy or the provision of open space within developments, some clarifications are required to make the policy sound. The requirement for on-site equipped play provision as default is not supported as it will not be appropriate for every site (e.g. duplication of high-quality equipped play). The provision of open space under HC17 will place further constraints on development and questions the ability to deliver sufficient homes across the Plan period.	Not stated	No	No	The policy provides an element of flexibility for developers to enter into an alternative play provision strategy where appropriate. The requirement that by default provision should be on-site is considered to offer the clearest guarantee that equipped play provision will be readily accessible to the residents of new development sites.  No change proposed.
Pegasus Group for Clowes Developments	AGT24-030-02-02	Policy HC17	The focus of Green Infrastructure provision should be based on quality rather than quantity. The policy text cites landscape buffers as an example of incidental GI which may be excluded – this is not appropriate as landscape buffers can be of a significant size and clearly contribute towards open space provision on site. The overly prescriptive wording of the policy should be revisited to ensure the policy takes a more flexible	Not stated	No	No	The level of open space requirement has been evidenced in an Open Space Standards strategy produced by KKP and is focussed solely on the delivery of meaningful and functional public open space which it is envisaged will also contribute in a qualitative way to housing scheme lay out. The inclusion of incidental space was excluded from

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			approach to open space provision. The policy is unsound as it is neither justified not consistent with national policy.				<p>this requirement and if reintroduced would require a higher policy standard.</p> <p>The policy provides an element of flexibility for developers to enter into an alternative play provision strategy where appropriate. The requirement that by default provision should be on-site is considered to offer the clearest guarantee that equipped play provision will be readily accessible to the residents of new development sites.</p> <p>No change proposed.</p>
Pegasus Group for Persimmon Homes	AGT24-030-04-01	Policy HC17	Whilst there is no in principle objection to the requirements of the policy or the provision of open space within developments, some clarifications are required to make the policy sound. The requirement for on-site equipped play provision as default is not supported as it will not be appropriate for every site (e.g. duplication of high-quality equipped play). It is not appropriate to require open space to be centrally located on all sites as this does not take into consideration differences in development sites.	Not stated	No	Not stated	<p>The policy provides an element of flexibility for developers to enter into an alternative play provision strategy where appropriate. The requirement that by default provision should be on-site is considered to offer the clearest guarantee that equipped play provision will be readily accessible to the residents of new development sites.</p> <p>It is considered that the delivery of meaningful and functional open space requires that such space should be situated where it will maximise utility.</p> <p>No change proposed.</p>
Pegasus Group for Persimmon Homes	AGT24-030-04-01	Policy HC17	The focus of Green Infrastructure provision should be based on quality rather than quantity. The policy text cites landscape buffers as an example of incidental GI which may be excluded – this is not appropriate as landscape buffers can be of a significant size and clearly contribute towards open space provision on site. The overly prescriptive wording of the policy should be revisited to ensure the policy takes a more flexible approach to open space provision. The policy is unsound as it is neither justified not consistent with national policy.	Not stated	No	Not stated	<p>The level of open space requirement has been evidenced in an Open Space Standards strategy produced by KKP and is focussed solely on the delivery of meaningful and functional public open space which it is envisaged will also contribute in a qualitative way to housing scheme lay out. The inclusion of incidental space was excluded from this requirement and if reintroduced would require a higher policy standard.</p> <p>The policy provides an element of flexibility for developers to enter into an alternative play provision strategy where appropriate. The requirement that by default provision should be on-site is considered to offer the clearest guarantee that equipped play provision will be readily accessible to the residents of new development sites.</p> <p>No change proposed.</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
Pegasus Group for Taylor Wimpey	AGT24-030-08-02	Policy HC17	Whilst there is no in principle objection to the requirements of the policy or the provision of open space within developments, some clarifications are required to make the policy sound. The requirement for on-site equipped play provision as default is not supported as it will not be appropriate for every site (e.g. duplication of high-quality equipped play). It is not appropriate to require open space to be centrally located on all sites as this does not take into consideration differences in development sites.	Not stated	No	Not stated	<p>The policy provides an element of flexibility for developers to enter into an alternative play provision strategy where appropriate. The requirement that by default provision should be on-site is considered to offer the clearest guarantee that equipped play provision will be readily accessible to the residents of new development sites.</p> <p>It is considered that the delivery of meaningful and functional open space requires that such space should be situated where it will maximise utility.</p> <p>No change proposed.</p>
Pegasus Group for Taylor Wimpey	AGT24-030-08-02	Policy HC17	The focus of Green Infrastructure provision should be based on quality rather than quantity. The policy text cites landscape buffers as an example of incidental GI which may be excluded – this is not appropriate as landscape buffers can be of a significant size and clearly contribute towards open space provision on site. The overly prescriptive wording of the policy should be revisited to ensure the policy takes a more flexible approach to open space provision. The policy is unsound as it is neither justified not consistent with national policy.	Not stated	No	Not stated	<p>The level of open space requirement has been evidenced in an Open Space Standards strategy produced by KKP and is focussed solely on the delivery of meaningful and functional public open space which it is envisaged will also contribute in a qualitative way to housing scheme lay out. The inclusion of incidental space was excluded from this requirement and if reintroduced would require a higher policy standard.</p> <p>The policy provides an element of flexibility for developers to enter into an alternative play provision strategy where appropriate. The requirement that by default provision should be on-site is considered to offer the clearest guarantee that equipped play provision will be readily accessible to the residents of new development sites.</p> <p>No change proposed.</p>
Monnox, P	RES24-152-04	Policy HC17	The Cannock Chase AONB is recognised as a highly sensitive area where visitor management is critical to maintaining its characteristics. With already planned increasing housing development in the wider vicinity and the growing human population, recreational use is predicted to increase. It is further acknowledged by the bodies responsible that there is a need to meet recreation demand while, in the long term, ensuring that the issues associated with high levels of recreation do not cause damage or lessen the experience for others. To identify a new housing site so close to the AONB is at odds with the need for its conservation, particularly where there is no overriding need for the site proposal. HC17 advises that the NPPF requires that existing open spaces should be protected.	No	No	No	<p>Policy HC17 is more directly related to the specific provision of public open space requirements to serve the need arising from new housing developments.</p> <p>See above for response to specific objection of the impact of site 036c South of Stafford on the National Landscape.</p> <p>No change proposed.</p>

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The Planning Bureau for McCarthy Stone	AGT24-033-01-05	Policy HC17	Policy HC17 introduces a number of open space requirements for new residential development. The council should note that open space needs of older people are much less than for mainstream housing. For older people the quality of open space either on site or easily accessible for passive recreation is much more important than formal open space. The Local Plan, if the council decide to set a minimum size for residential outdoor amenity open space, should provide an exemption for older people's housing schemes but consider the quality and function of the amenity space instead.	No	No	No	The district is unlikely to see many exclusively older persons developments, however for these it can be considered by the case officer at the application stage if the provision of play areas is appropriate. Further guidance will be provided through the Open Space, Sport and Recreation SPD.
<b>POLICY HC18: SPORTS FACILITIES AND PLAYING PITCHES</b>							
Sport England	STA24-042-05	Policy HC18	Change policy title by replacing 'pitches' with 'fields'. Enhancements to provision could be delivered which are not identified in the Playing Pitch Strategies, this should be acknowledged in the policy or supporting text. The remit of the Open Space, Sport and Recreation SPD should be set out within the policy and its supporting text.	Yes	No	Yes	<b>Minor modification 024: amend policy title – Sports Facilities and Playing Pitches Fields.</b>  The remit of the SPD will extend to open spaces in general as well as playing fields and it is not considered necessary to fix the contents of the SPD though policy.
Avison Young for Crest Nicholson	AGT24-004-02-03	Policy HC18	Should make specific reference to the CIL Regulation 122 tests for planning obligations to ensure that any requests for financial contributions towards infrastructure are appropriately justified, lawful and comply with national policy.	Yes	No	Not stated	The requirements for planning obligations are set out in NPPF (December 2023) paragraph 57 and it is not therefore considered necessary to repeat these within the policy.
Pegasus Group for BDW Trading Ltd	AGT24-030-01-11	Policy HC18	We note that the Future Housing Growth & Playing Pitch Requirements Topic Paper (2024) identifies current and projected shortfalls in provision. However, this may not necessarily be the case in the future, particularly when the shortfalls are minimal for the most part.  We consider that the policy needs rewording so that it requires a contribution only when it is demonstrably necessary, so that it is consistent with national policy and meets the tests set out in Regulation 122(2) of the Community Infrastructure Levy Regulations 2010.	Not stated	No	Not stated	Agreed in part. The Playing Pitch Strategy (PPS) does indicate that there are likely to be projected shortfalls though in provision though this is not evenly spread through the district, and it is acknowledged that this can be a fluid situation given other sources of funding which may support changes in the current picture of pitch supply and quality. The PPS concludes with respect to meeting future requirements that 'existing sites within the locality will need to be assessed to understand if they can accommodate increased usage and whether improvements to quality and/or quantity will help achieve this.'  The requirements for planning obligations are set out in NPPF (December 2023) paragraph 57 and it is not therefore considered necessary to repeat these within the policy.  No change proposed.
RCA Regeneration for Barberry Developments	AGT24-035-01-02	Policy HC18	We recognise the importance of supporting infrastructure. It is true that the provision of housing contributes significantly to such supporting infrastructure via Section 106 agreements.	No	No	No	Comment noted.  No change proposed.
RCA Regeneration	AGT24-	Policy	We recognise the importance of supporting infrastructure. It is	Not stated	No	No	Comment noted.



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for Seven Capital	035-03-02	HC18	true that the provision of housing contributes significantly to such supporting infrastructure via Section 106 agreements.				No change proposed.
Evolve Planning & Design for Lovell Homes	AGT24-017-05-01	Policy HC18	Lovell Homes recognises that a financial contribution to sports facilities and playing pitches may be necessary from new major development to meet needs arising from the development, but this should only apply where evidence recognises there is a shortfall in capacity to meet the generated demand from the development.	Not stated	Not stated	Not stated	The requirements for planning obligations are set out in NPPF (December 2023) paragraph 57 and it is not therefore considered necessary to repeat these within the policy.  No change proposed.
Evolve Planning & Design for Keon Homes	AGT24-017-04-01	Policy HC18	Keon Homes recognises that a financial contribution to sports facilities and playing pitches may be necessary from new major development to meet needs arising from the development, but this should only apply where evidence recognises there is a shortfall in capacity to meet the generated demand from the development.	Not stated	Not stated	Not stated	The requirements for planning obligations are set out in NPPF (December 2023) paragraph 57 and it is not therefore considered necessary to repeat these within the policy.  No change proposed.
Evolve Planning & Design for Four Ashes Road Ltd	AGT24-017-03-01	Policy HC18	Keon Homes recognises that a financial contribution to sports facilities and playing pitches may be necessary from new major development to meet needs arising from the development, but this should only apply where evidence recognises there is a shortfall in capacity to meet the generated demand from the development.	Not stated	Not stated	Not stated	The requirements for planning obligations are set out in NPPF (December 2023) paragraph 57 and it is not therefore considered necessary to repeat these within the policy.  No change proposed.
Evolve Planning & Design for Cameron Homes	AGT24-017-02-01	Policy HC18	Cameron Homes recognises that a financial contribution to sports facilities and playing pitches may be necessary from new major development to meet needs arising from the development.	Not stated	Not stated	Not stated	The requirements for planning obligations are set out in NPPF (December 2023) paragraph 57 and it is not therefore considered necessary to repeat these within the policy.  No change proposed.
Evolve Planning & Design for Bloor Homes	AGT24-017-01-09	Policy HC18	Land East of Bilbrook - Bloor Homes recognises that a financial contribution to sports facilities and playing pitches may be necessary from new major development to meet needs arising from the development.	Not stated	Not stated	Not stated	Comment noted.  No change proposed.
Pegasus Group for Richborough Estates	AGT24-030-05-02	Policy HC18	The emphasis should be on establishing deficiencies in existing sports and playing pitch provision, and a requirement for any additional provision alongside the proposed development having regard to the tests of the CIL Regulations, rather than making a blanket assumption that all major developments will be required to make a contribution. It is noted that further guidance will be provided in an Open Space, Sport and Recreation SPD, but no further quantitative details are provided to set out the detail of what will be expected within the Publication Plan.	Yes	No	Yes	The requirements for planning obligations are set out in NPPF (December 2023) paragraph 57 and it is not therefore considered necessary to repeat these within the policy.  <b>Minor modification 023: "...demand generated by new residents. The Sports England playing pitch and indoor facilities calculators will be used to inform the level of contributions required".</b>
Pegasus Group for Clowes Developments	AGT24-030-02-02	Policy HC18	The emphasis should be on establishing deficiencies in existing sports and playing pitch provision, and a requirement for any additional provision alongside the proposed development having regard to the tests of the CIL Regulations, rather than making a blanket assumption that all major developments will be required to make a contribution. It is noted that further guidance will be	Not stated	No	No	The requirements for planning obligations are set out in NPPF (December 2023) paragraph 57 and it is not therefore considered necessary to repeat these within the policy.  <b>Minor modification 023: "...demand generated by</b>

**CHAPTER 9 & POLICIES HC14-HC19: PROMOTING SUCCESSFUL AND SUSTIANBLE COMMUNITIES**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			provided in an Open Space, Sport and Recreation SPD, but no further quantitative details are provided to set out the detail of what will be expected within the Publication Plan. The requirements of delivering sports facilities and playing pitches through on-site provision or S106 contributions is only one element of the package that sites will need to provide and the Council must ensure the delivery of all potential obligations are taken into account.				<b>new residents. The Sports England playing pitch and indoor facilities calculators will be used to inform the level of contributions required".</b>
Pegasus Group for Miller Homes	AGT24-030-03-15	Policy HC18	We do not consider that this policy is consistent with national policy. We consider that the policy needs rewording so it requires a contribution only when it is demonstrably necessary, so it is consistent with national policy.	Not stated	No	No	The requirements for planning obligations are set out in NPPF (December 2023) paragraph 57 and it is not therefore considered necessary to repeat these within the policy.
Pegasus Group for Persimmon Homes	AGT24-030-04-01	Policy HC18	The emphasis should be on establishing deficiencies in existing sports and playing pitch provision, and a requirement for any additional provision alongside the proposed development having regard to the tests of the CIL Regulations, rather than making a blanket assumption that all major developments will be required to make a contribution. The wording of the policy should be amended to ensure this is made explicit. It is noted that further guidance will be provided in an Open Space, Sport and Recreation SPD, but no further quantitative details are provided to set out the detail of what will be expected within the Publication Plan. The Council must ensure the delivery of all potential obligations are taken into account for both on and off-site provision to support the soundness of the Plan.	Not stated	No	Not stated	The requirements for planning obligations are set out in NPPF (December 2023) paragraph 57 and it is not therefore considered necessary to repeat these within the policy.  <b>Minor modification 023: "...demand generated by new residents. The Sports England playing pitch and indoor facilities calculators will be used to inform the level of contributions required".</b>
Pegasus Group for Taylor Wimpey	AGT24-030-08-02	Policy HC18	The emphasis should be on establishing deficiencies in existing sports and playing pitch provision, and a requirement for any additional provision alongside the proposed development having regard to the tests of the CIL Regulations, rather than making a blanket assumption that all major developments will be required to make a contribution. The wording of the policy should be amended to ensure this is made explicit. It is noted that further guidance will be provided in an Open Space, Sport and Recreation SPD, but no further quantitative details are provided to set out the detail of what will be expected within the Publication Plan. The Council must ensure the delivery of all potential obligations are taken into account for both on and off-site provision to support the soundness of the Plan.	Not stated	No	Not stated	The requirements for planning obligations are set out in NPPF (December 2023) paragraph 57 and it is not therefore considered necessary to repeat these within the policy.  <b>Minor modification 023: "...demand generated by new residents. The Sports England playing pitch and indoor facilities calculators will be used to inform the level of contributions required".</b>
<b>POLICY HC19: GREEN INFRASTRUCTURE</b>							
Kinver Parish Council	STA24-025-08	Policy HC19	Policy could be strengthened and made more specific, noting that there is no mention of local green spaces in the plan. LGS designation is the only protection which takes account the value local people attach to a site and is the only protection truly site specific. This is clearly a missed opportunity, and policy enhancement should be linked to Biodiversity Net Gain projects.	Not stated	Not stated	Not stated	Comments noted.  Biodiversity net gain is covered in detail in Policy NB2 and is subject to national requirements. It is considered that adding details regarding BNG to Policy HC19 would be duplication and could cause confusion.
Evolve Planning &	AGT24-	Policy	Lovell Homes supports the policy approach to protecting,	Not stated	Not stated	Not stated	Comments noted.

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
Design for Lovell Homes	017-05-01	HC19	maintaining and enhancing where possible a network of inter-connected, multi-functional and accessible green and blue spaces.				No changes proposed.
Evolve Planning & Design for Keon Homes	AGT24-017-04-01	Policy HC19	Keon Homes supports the policy approach to protecting, maintaining and enhancing where possible a network of inter-connected, multi-functional and accessible green and blue spaces.	Not stated	Not stated	Not stated	Comments noted. No changes proposed.
Evolve Planning & Design for Four Ashes Road Ltd	AGT24-017-03-01	Policy HC19	Keon Homes supports the policy approach to protecting, maintaining and enhancing where possible a network of inter-connected, multi-functional and accessible green and blue spaces.	Not stated	Not stated	Not stated	Comments noted. No changes proposed.
Evolve Planning & Design for Cameron Homes	AGT24-017-02-01	Policy HC19	Cameron Homes supports the policy approach to protecting, maintaining and enhancing where possible a network of inter-connected, multi-functional and accessible green and blue spaces.	Not stated	Not stated	Not stated	Comments noted. No changes proposed.
Evolve Planning & Design for Bloor Homes	AGT24-017-01-09	Policy HC19	Land East of Bilbrook - Bloor Homes supports the policy approach to protecting, maintaining and enhancing where possible a network of inter-connected, multi-functional and accessible green and blue spaces.	Not stated	Not stated	Not stated	Comments noted. No changes proposed.
Turley Associates for Bellway Homes	AGT24-041-01-02	Policy HC19	Kinver - Please refer to our previous representations made in December 2022 on this matter at Appendix 1. 2022 Rep – the broad themes of the policy are understood and achievable, the policy is not clear on whether this requirement will be triggered where sites are also providing compensatory green infrastructure on sites which have been taken out of the Green Belt.	No	No	No	It may be that sites are able to contribute to the requirements under Policy HC19 through their Green Belt compensatory measure required under DS2. However, applicants will still be required to consider both policies in developing their proposals.  No change proposed.
Turley Associates for Bellway Homes	AGT24-041-01-02	Policy HC19	Wombourne - Please refer to our previous representations made in December 2022 on this matter at Appendix 1. 2022 Rep – an enhancement in the provision of green infrastructure can be achieved on both sites with buffers to the Green Belt to the north and west.	No	No	No	Comments noted.  Policy HC19 does not cover site-specifics and therefore any details relating to a specific site will be assessed under the relevant planning application.
Lloyd, K	RES24-136-13	Policy HC19	The Friends of Bilbrook have had an application for the creation of a right of way between Jubilee Wood and the footpath network. This has stalled with no likelihood of resolution. We would like to see this application given priority especially given the increased footfall of 800+ houses in the village.  Not possible to connect together and enhance biodiversity and wildlife habitats on the Bilbrook Site. The boundaries of the site extend right up to Barnhurst Lane. The eastern boundary adjacent Barnhurst Lane should be set aside to protect the green corridor but should not form part of a green open space which will be accessible to people or their pets.	No	No	Yes	Applications for Public Rights of Way are considered by Staffordshire County Council, and not through the local plan process.  The proposed allocation east of Bilbrook will be subject to a masterplan as required under policy MA1, and a strategy for open space developed through this process.  No change proposed.

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
Caven, M	RES24-038-02	Policy HC19	Site 036c- The development of land will cause serious harm to the natural habitat of a wide number of species. The government, ecologists, etc are always indicating how special care must be taken.	No	No	No	The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to – identify – amongst other things – allocations which may have a 'likely significant effect' on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact on habitats sites.
Marsh, J	RES24-140-03	Policy HC19	Queries how biodiversity can be improved by bulldozing three fields? Queries what effect on the local wildlife will these houses and their cars have? Not a positive one.	Not stated	Not stated	Not stated	Biodiversity Net Gain (BNG) will ensure that the development has a measurably positive impact on biodiversity, compared to what was on site prior to the development. This gain will be at least 10%.
Wyatt, B	RES24-261-03	Policy HC19	<ul style="list-style-type: none"> <li>- The plan has not been subject to effective DtC with Stafford BC.</li> <li>- The plan fails the NPPF.</li> <li>- There is no need for site 036c residential development in this locality, nor a need so close to Cannock Chase AONB.</li> <li>- The AONB Management Plan 2019/24 emphasises the importance of maintaining the quality and distinctiveness of the landscape character and unsuitable development should be resisted.</li> <li>- Stafford BCs response to the 2022 consultation noted that development at site 036c should not go ahead.</li> <li>- Site 036c is close to the Radford Meadows Wildlife Trust Reserve.</li> <li>- Many birds, deer, fox, hedgehog, field mouse, grey squirrel, and pipistrelle bat have been reported on site 036c.</li> <li>- Site 036c is in close proximity to the boundary of the AONB with the only significant barrier to wildlife corridors being the A34.</li> <li>- Allocating site 036c would have a negative impact upon Policy HC19 by cutting the connectivity between the AONB and Radford Meadows Wildlife Trust Reserve.</li> <li>- The DEFRA Magic Map shows site 036c as within the SSSI impact zones for Baswich Meadows SSSI and Milfield Quarry SSSI with no consideration of these impacts.</li> <li>- The DEFRA Magic Map shows site 036c is within the Nitrate Vulnerability Zone and adjoining priority woodland.</li> <li>- Site 036c is open countryside and prime, grade 3a agricultural land.</li> <li>- Site 036c does not comply with policies HC19 or NB1.</li> <li>- Not considered that efforts to mitigate the damage of building on site 036c through financial contributions or BNG would overcome the loss of connectivity between the AONB and Radford Meadows Wildlife Trust Reserve.</li> </ul> <p>Site 036c should be deleted from the plan.</p>	No	No	No	<p>Stafford Borough Council (SBC) and SSDC have an agreed SoCG that addresses Duty to Cooperate matters effectively that both parties consider to be sound and lawful as set out in the Duty to Cooperate Topic Paper 2024.</p> <p>The council considers that all proposed allocations comply with the NPPF and the spatial strategy (identified in Policy DS5) insofar as they are located to deliver sustainable patterns of development that are distributed across the district on strategic planning matters and meet the authorities' identified housing need.</p> <p>Albeit as a relatively smaller proposed allocation, site 036c will still contribute to meeting the housing needs of South Staffordshire alongside the other residential allocations in the plan. This includes a contribution to unmet needs of neighbouring authorities and 10% plan flexibility (as set out in Policy DS4) to allow for any uncertainties around site delivery.</p> <p>Development in locations to the northeast of the district towards Cannock Chase AONB, have the potential to have a negative effect on the character and/or setting of the AONB. Any future planning application would be expected to address Policy NB4 insofar as they must conserve and enhance the landscape and scenic beauty of the area and habitats sites and conform with the most up to date AONB SPDs.</p> <p>SSDC has had to identify all suitable non-Green Belt sites as part of demonstrating exceptional circumstances, and site 036c has been identified as suitable through the Housing Site Assessment</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							<p>Topic Paper 2024.</p> <p>The council has commissioned a Habitats Regulations Assessment (HRA) to screen the plan to identify – amongst other things – allocations which may have a ‘likely significant effect’ on a habitats site. Emanating from this, no sites required an appropriate assessment based upon their impact on habitats sites.</p> <p>The ‘development management’ policies included in the plan (including Policy NB1) are designed to guide future planning applications, as site assessment matters have been dealt with in identifying suitable sites for allocation as detailed in the Housing Site Selection Topic Paper 2024.</p> <p>The entirety of the district is included within the Nitrate Vulnerability Zone; therefore, it is unavoidable that all allocations will be located within and can’t be considered a determinative factor in site selection.</p> <p>The methodology for the Sustainability Appraisal’s (SA) assessment against SA Objective 3 - Biodiversity and Geodiversity has considered sites proximity to SSSIs (amongst other nationally and locally designated sites) in its scoring, including if a site falls within a SSSI Impact Risk Zone (IRZ). Where major positive and major negative effects are predicted in the 2024 SA then these have been recorded in the site assessment proformas in the Housing Site Assessment Topic Paper to be considered alongside other material planning considerations when arriving at a balanced judgement on which sites to propose for allocation.</p> <p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district’s agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p>



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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							<p>Any specific developer contributions that are required to mitigate any adverse impacts of development on Cannock Chase SAC will be secured at the point of a planning application approval. The council considers that the mechanism to secure such a financial contribution is through Policy NB3 is satisfactory.</p> <p>No change proposed.</p>

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**CHAPTER 10 & POLICIES EC1-EC7: BUILDING A STRONG LOCAL ECONOMY**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
<b>GENERAL ISSUES: CHAPTER 10 (inc specific paras references)</b>							
Watt, J	RES24-246-09	10.12	<p>Site 036c – land south of Stafford, is valuable agricultural land which supplies local businesses thus negating the need for excessive journeys. This must be better for the environment and climate change.</p> <p>Site 036c should remain as agricultural land.</p>	No	No	No	<p>Best and Most Versatile agricultural land has been considered through the Sustainability Appraisal. The majority of the district’s agricultural land is classified as potential BMV, classified as either Grades 1, 2, or 3, and therefore some loss of higher quality agricultural land is unavoidable when considering the lack of PDL or lower ALC sites available. All proposed sites for residential development have been assessed in the round against a consistent set of planning criteria in order to determine those that are better performing as sustainable allocations.</p> <p>No change proposed.</p>
<b>POLICY EC1: SUSTAINABLE ECONOMIC GROWTH</b>							
Dudley Metropolitan Borough Council	STA24-015-05	Policy EC1	Consider the policy to be sound and supports this policy as it directs economic growth towards the district's strategic employment sites that will assist in contributing to the unmet employment land needs of the Black Country.	Yes	Yes	Yes	Comments noted.
Penkridge Parish Council	STA24-036-01	Policy EC1	<p>The WMI is identified as a major employment site. This in turn will create major traffic movements in and through Penkridge and for users of the existing village centre services.</p> <p>The Local Plan review does not show any other small scale sites for commercial development in Penkridge, although the availability for such sites may also be possible on land to the west of Penkridge.</p> <p>There are also concerns about the provision of adequate Doctors’ services with the growth of the population.</p> <p>The Local Plan review does not show any justifiable and sustainable development for retail development community use or and possible a sustainable school site. The design of any masterplan will need to show more detail before acceptance by the community. Or should the existing retail and school provisions be extended.</p>	Not stated	Not stated	Not stated	<p>WMI has been granted through a Development Consent Order. Traffic movements have been considered through the DCO process. The Strategic Site ‘Land North of Penkridge’ will include a new first school and small retail centre / community hub. The Plan provide a high-level illustrative masterplan with further details being agreed through a comprehensive masterplan through the development management process as stated in Policy MA1.</p> <p>No change proposed.</p>
Savills UK Ltd for St Modwen & JM Holt	AGT24-037-04-09	Policy EC1	<p>We object to Policy EC1 ‘Sustainable Economic Growth’ as currently written, on the basis that the proposed employment land strategy is not currently justified or supported by appropriate fully tested evidence (NPPF paragraph 35).</p> <p>The employment land needs for South Staffordshire should be uplifted to address methodological weaknesses within the EDNA, to reflect significant demand arising within the wider FEMA and to embed flexibility in the delivery of employment land.</p>	Yes	No	No	<p>South Staffordshire consider that Policy EC1 is sound and sufficient land for employment is provided in the plan (see policy DS4) to meet the needs of South Staffordshire and provide a contribution towards the unmet needs of neighbouring authorities within the plan period.</p> <p>No change proposed.</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			An additional policy or policy wording (added to Policy DS3 or EC4) should be included that supports windfall employment coming forward.				
RCA Regeneration for Barberray Developments	AGT24-035-01-02	Policy EC1	Policy EC1 should recognise the positive economic impacts of housing delivery across the district and make note of the value of investment in local supply chains as well as the creation of short and long-term employment opportunities, as well as supporting apprenticeships noted in EC3. Local tax revenue associated with more households paying council tax will contribute positively towards funding local services and supporting infrastructure.	No	No	No	Reference to the positive economic impacts of housing delivery in this policy is not considered necessary.  No change proposed.
RCA Regeneration for Seven Capital	AGT24-035-03-02	Policy EC1	Policy EC1 should recognise the positive economic impacts of housing delivery across the district and make note of the value of investment in local supply chains as well as the creation of short and long-term employment opportunities, as well as supporting apprenticeships noted in EC3. Local tax revenue associated with more households paying council tax will contribute positively towards funding local services and supporting infrastructure.	Not stated	No	No	Reference to the positive economic impacts of housing delivery in this policy is not considered necessary.  No change proposed.
RCA Regeneration for Richborough Estates	AGT24-035-02-02	Policy EC1	Policy EC1 should recognise the positive economic impacts of housing delivery across the district and make note of the value of investment in local supply chains as well as the creation of short and long-term employment opportunities, as well as supporting apprenticeships noted in EC3. Local tax revenue associated with more households paying council tax will contribute positively towards funding local services and supporting infrastructure.	Not stated	No	No	Reference to the positive economic impacts of housing delivery in this policy is not considered necessary.  No change proposed.
Emery Planning for Wolverhampton Airport Ltd	AGT24-016-03-01	Policy EC1	The policy and general support for investment into the aerospace engineering sector are supported. It is considered our client's land interests at Halfpenny Green Airport are unique within the Borough and provide potential and opportunity to attract significant investment in the aerospace sector, and the Policy should recognise the role of Halfpenny Green Airport can play in developing this potential growth sector within the authority area.	Not stated	No	Not stated	Halfpenny Green Airport benefits from its own specific policy (EC10) which is considered sufficient.  No change proposed.
CPRE Staffordshire	STA24-013-08	Policy EC1	WMI. Removal of green belt designation in this plan risks the development proceeding without the construction of the interchange. The site should be given a site designation which references the secretary of state's decision and cross references the key importance of the early construction of the rail based interchange. The site should be retained as green belt in the current plan.	Not stated	No	Not stated	WMI is not proposed to be removed from the Green Belt.  No change proposed.
Pegasus Group for Clowes Developments	AGT24-030-02-01	Policy EC1	EC1 identifies 6 strategic employment sites. However, Hilton Cross is now largely developed and the WMI is designed for regional/national requirements and is unlikely to meet the needs of local businesses. Land at i54 is largely taken, with the	No	No	No	South Staffordshire consider that Policy EC1 is sound and sufficient land for employment is provided in the plan (see policy DS4) to meet the needs of South Staffordshire and provide a

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			remaining allocations based around Wolverhampton. Clowes considers that SSDC, due to its locational relationship with the Black Country, need to allocate a balanced amount of employment sites. Further land needs to be developed and the policy should be amended to make it clear that over development opportunities are being brought forward to meet the needs of the Black Country overspill which has not been met.				contribution towards the unmet needs of neighbouring authorities within the plan period.  No change proposed.
Pegasus Group for Clowes Developments	AGT24-030-02-01	Policy EC1	Clowes considers that there is an over-reliance on WMI. The development is intended to serve regional/national companies, and whilst such a provision is welcome, will not meet the needs of local businesses. The Plan does not meet the DtC by failing to meet the needs of other authorities who have a functional and economic relationship with South Staffordshire.	No	No	No	South Staffordshire consider that Policy EC1 is sound and sufficient land for employment is provided in the plan (see policy DS4) to meet the needs of South Staffordshire and provide a contribution towards the unmet needs of neighbouring authorities within the plan period.  A specific SoCG on the South Staffordshire FEMA has been prepared with the relevant Local Authorities within the FEMA.  No change proposed.
Marsh, J	RES24-140-04	Policy EC1	There are no provisions in these plans that support home working, reduce commuting journeys. It is already a commuter village, no train station, barely any public transport, and no immediate road links. It is around 30-40 minute drive to the nearest motorway, either M6 J10 or M5 J2. Traffic out of the village is usually a challenge during rush hour. The plans completely ignore the fact that 250 houses in Wombourne means around 500 extra cars. There are practically no jobs in the village that would support the purchase of literally any property in Wombourne. Hence, a village of commuters.	Not stated	Not stated	Not stated	The proposed spatial strategy (DS5) in the plan is to direct development to the most sustainable locations within the district. Policy EC13: Broadband seeks to ensure full fibre connectivity which will support home working.  No change proposed.
Sutton, M	RES24-226-06	Policy EC1	All proposed sites should have a clear assessment criteria to ensure that it can be delivered, is suitable when considering its location and the public have made adequate consultation opportunity before it's allocated and have seen and had access to the suitability analysis, otherwise how can they make an informed decision and constructive comment. In the case of Dunston Junc. 13 this has not taken place, therefore its inclusion in the local plan is inappropriate as the public have not had sight of any analysis and haven't had an opportunity to influence and shape future development.	Not stated	Not stated	Not stated	All proposed employment allocations have been considered through the Employment Site Assessment Topic Paper 2024 which provides the methodology for employment site assessment.  No change proposed.
JMS Planning for Wolverhampton Halfpenny Green Airport	AGT24-023-01-01	Policy EC1	JMS Planning supports the employment policies that are set out in the local plan, especially in relation to the diversification of the rural economy again seek for clarification on the interaction of policies. For instance, Policy EC1 outlines the commitment that South Staffordshire make to supporting the growth of the economy in the district. It is important that the interaction between Green Belt and Employment policies is clear. This is especially relevant since evidence base document EDNA Update 2024 (see para 10.13). While it is acknowledged that South	Not stated	Not stated	Not stated	It is considered that the suite of policies within the Plan taken as a whole offer clear direction for where employment development would be considered acceptable. A number of policies are often applicable when considering such development.  No change proposed.

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			Staffordshire does identify a significant supply of employment land through strategic sites and indeed sets out a range of policies to support the rural economy, without demonstrating how policies interact with strategic policies such as Green Belt policy DS1, this may not produce the supply of windfall development that the policies are intended to produce.				
<b>POLICY EC2: RETENTION OF EMPLOYMENT SITES</b>							
Dudley Metropolitan Borough Council	STA24-015-06	Policy EC2	Considers the policy to be sound and supports this policy as it protects the district's strategic employment sites that will assist in contributing to the unmet employment land needs of the Black Country.	Yes	Yes	Yes	Comments noted.
Marsh, J	RES24-140-05	Policy EC2	The sewage works at Bridgnorth Road has recently closed down. This is an ideal brownfield site within 200 metres of the proposed fields. Queries why this location can't be properly considered. Plans and decisions must have already been made.	Not stated	Not stated	Not stated	The site of the former sewage works at Bridgnorth Road, Wombourne has been considered as a reasonable alternative site through the Sustainability Appraisal and through the Economic Strategy and Employment Site Assessment Topic Paper 2024 and was assessed as unsuitable for allocation.  No change proposed.
<b>POLICY EC3: EMPLOYMENT AND SKILLS</b>							
Staffordshire County Council	STA24-044-09	Policy EC3	Fully support the principle of Policy EC3 and been working closely with colleagues at the District Council on the early implementation of the Employment and Skills Plan for the WMI development.  The employment and skills sections feature on pages 113 & 114 of the Plan. There is reference to the need to complete an employment & skills plan, and there is a brief description of the themes to feature in the ESP though a bit limited. There is also reference to a need for specific and measurable outputs to be secured through a legal agreement or planning condition. The County has been working with District/Borough (and Stoke-on-Trent City Council) colleagues to prepare a Employment and Skills Plan Framework that will provide advice and structure on the preparation of Employment and Skills Plans associated with new development across Staffordshire. This approach was endorsed by Staffordshire District/Borough Directors earlier this year to provide consistency across the County. However, we note the Plan does not make reference to this.	Yes	No	Yes	The policy already requires engagement with the council's Enterprise Team when developing an ESP, and therefore it is considered appropriate for them to direct applicants to the Employment and Skills Plan Framework (or subsequent revisions) as part of those discussions.  No change proposed.
Savills UK Ltd for St Modwen & JM Holt	AGT24-037-04-10	Policy EC3	We support Policy EC3 as written. As part of the outline planning application for the M6 Junction 13, Stafford (E30) Site, St. Modwen Logistics is in the process of preparing an employment and skills plan in accordance with the policy.	Yes	No	No	Comments noted.
Evolve Planning & Design for Lovell	AGT24-017-05-	Policy EC3	The requirement for an Employment and Skills Plan to be prepared for all developments of 100 or more residential units is	Not stated	Not stated	Not stated	It is important that local people should have the opportunity to directly benefit from the



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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
Homes	01		not supported by Lovell Homes. Lovell Homes does have a commitment for the employment of local sub-contractors with development sites recording whether individuals live within 25 miles of the site. Lovell Homes supports local employment growth and assists in addressing the construction skills shortage through graduate, apprenticeship, and trainee programmes.				<p>construction of new development within there are and will reduce the distance construction workers, other employees and end occupiers will need to travel to work.</p> <p>Details and site-specific considerations can be considered through the Employment and Skills Plan (ESP) on a site-by-site basis.</p> <p>No change proposed.</p>
Evolve Planning & Design for Keon Homes	AGT24-017-04-01	Policy EC3	The requirement for an Employment and Skills Plan to be prepared for all developments of 100 or more residential units is not supported by Keon Homes. It is not clear how any certainty could be provided through the provision of such a Plan. Keon Homes is a local housebuilder with a headquarters within 5km of South Staffordshire District. As such, Keon Homes already supports local employment growth.	Not stated	Not stated	Not stated	<p>It is important that local people should have the opportunity to directly benefit from the construction of new development within there are and will reduce the distance construction workers, other employees and end occupiers will need to travel to work.</p> <p>Details and site-specific considerations can be considered through the Employment and Skills Plan (ESP) on a site-by-site basis.</p> <p>No change proposed.</p>
Evolve Planning & Design for Cameron Homes	AGT24-017-02-01	Policy EC3	The requirement for an Employment and Skills Plan to be prepared for all developments of 100 or more residential units is not supported by Cameron Homes. Cameron Homes is a local housebuilder with a headquarters within 5km of South Staffordshire District and as such, already supports local employment growth.	Not stated	Not stated	Not stated	<p>It is important that local people should have the opportunity to directly benefit from the construction of new development within there are and will reduce the distance construction workers, other employees and end occupiers will need to travel to work.</p> <p>Details and site-specific considerations can be considered through the Employment and Skills Plan (ESP) on a site-by-site basis.</p> <p>No change proposed.</p>
Evolve Planning & Design for Bloor Homes	AGT24-017-01-09	Policy EC3	Land East of Bilbrook - The requirement for an Employment and Skills Plan to be prepared for all developments of 100 or more residential units is not supported by Bloor Homes. Details of Bloor Homes commitment to the Home Building Skills Pledge are detailed in paragraphs 8.2 – 8.4 of the full representation.	Not stated	Not stated	Not stated	<p>It is important that local people should have the opportunity to directly benefit from the construction of new development within there are and will reduce the distance construction workers, other employees and end occupiers will need to travel to work.</p> <p>Details and site-specific considerations can be considered through the Employment and Skills Plan (ESP) on a site-by-site basis.</p> <p>No change proposed.</p>
Savills UK Ltd for Taylor Wimpey	AGT24-037-05-	Policy EC3	The requirement for an Employment and Skills Plan to be prepared for all developments of 100 or more residential units is	Not stated	No	Not stated	<p>It is important that local people should have the opportunity to directly benefit from the</p>

**CHAPTER 10 & POLICIES EC1-EC7: BUILDING A STRONG LOCAL ECONOMY**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
	06		not supported by Taylor Wimpey. It is not clear how any certainty could be provided through the provision of such a Plan. It should be recognised that the business model employed by Taylor Wimpey and other major housebuilders relies upon subcontractor businesses. Despite this, if Cross Green were re-allocated, construction stage opportunities are identified in the full representation.				<p>construction of new development within there are and will reduce the distance construction workers, other employees and end occupiers will need to travel to work.</p> <p>Details and site-specific considerations can be considered through the Employment and Skills Plan (ESP) on a site-by-site basis.</p> <p>No change proposed.</p>
Pegasus Group for Taylor Wimpey	AGT24-037-05-06	Policy EC3	The requirement for an Employment and Skills Plan to be prepared for all developments of 100 or more residential dwellings is not supported. Whilst the benefits of such plans are acknowledged, it is considered more appropriate to implement them on a site-by-site basis. If the policy is to be found sound it should be amended to incorporate flexibility.	Not stated	No	Not stated	<p>It is important that local people should have the opportunity to directly benefit from the construction of new development within there are and will reduce the distance construction workers, other employees and end occupiers will need to travel to work.</p> <p>Details and site-specific considerations can be considered through the Employment and Skills Plan (ESP) on a site-by-site basis.</p> <p>No change proposed.</p>
Marsh, J	RES24-140-06	Policy EC3	Not aware of any ESP for this site of over 250 houses.	Not stated	Not stated	Not stated	The Employment and Skills Plan (ESP) is being introduced by the emerging Local Plan.
<b>POLICY EC4: RURAL ECONOMY</b>							
Savills UK Ltd for St Modwen & JM Holt	AGT24-037-04-11	Policy EC4	<p>It is suggested that Policy EC4 is amended to recognise of the importance of motorway junction locations to the delivery of industrial and logistics development.</p> <p>It is requested that the following additional text be included at the end of Section 2 of Policy EC4:</p> <p>"Where evidence indicates an immediate need or demand for additional employment land (B1, B2 and B8) that cannot be met from land allocated in this plan, the Council will consider favourably proposals that meet the identified need in appropriate locations outside of the district's settlements in the open countryside, subject to proposals:</p> <p>a. Being accessible or will be made accessible by a choice of means of transport, including sustainable transport modes, as a consequence of planning permission being granted for the development; and</p> <p>b. Having good access to the strategic highway network (M6 motorway) and an acceptable impact on the capacity of that network, including any junctions; and</p> <p>c. Not being detrimental to the amenities of any nearby residential properties or the wider environment."</p>	Yes	No	No	<p>The Plan allocates sufficient land for employment uses including logistics. The policy amendments suggested are not required.</p> <p>No change proposed.</p>
Historic England	STA24-023-01	Policy EC4	Amend para 4b remove 'amenity' to retain the focus on historic environment.				Minor modification 028: "b) There is no adverse impact on amenity or the historic environment"

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**CHAPTER 10 & POLICIES EC1-EC7: BUILDING A STRONG LOCAL ECONOMY**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
Emery Planning for Wain Estates	AGT24-016-02-01	Policy EC4	Part 2 of the policy supports rural employment outside development boundaries, subject to a number of criteria. However, some of the criteria are conflicting. In particular, we object to criterion b, which requires development to comprise the conversion and reuse of rural buildings. If such development can satisfy criteria c (the development is not capable of being located within the development boundaries of a village, by reason of the nature of the operation or the absence of suitable sites) and d (it is supported by an appropriate business case which demonstrates that the proposal will support the local economy, which in turn would help sustain rural communities), then it is an unreasonable constraint for the policy to only apply to the conversion and reuse of rural buildings. We note that the conversion and re-use of rural agricultural buildings is also covered under part 3 of the policy. The policy is therefore unsound on the basis that its criteria are not justified in context of each other. The plan therefore fails to comply with paragraph 35 b) of the Framework in this regard.	Not stated	No	No	Minor modification 026: b) It comprises prioritises the conversion and reuse of rural buildings.
Emery Planning for Wolverhampton Airport Ltd	AGT24-016-03-01	Policy EC4	It is considered that the policy should recognise the role of existing commercial uses outside of development boundaries and the need for existing businesses in the rural area to develop beyond the conversion and reuse of existing buildings, especially on sites which are recognised as being previously developed land and where it's re-use would also then be contributing to sustainability objectives.  As prepared the policy is inconsistent with paragraphs 88 and 89 of the NPPF. The policy states employment development outside settlement boundaries will only be supported where all of the criteria set out in paragraph 3.4 are satisfied, including that development should comprise the conversion and reuse of existing buildings, which is inconsistent with paragraph 88. It should reflect paragraph 89 in that it should recognise that sites to meet local community and business needs in rural areas may be located beyond existing settlements.	Not stated	No	Not stated	Minor modification 026: b) It comprises prioritises the conversion and reuse of rural buildings.  Minor modification 027: "e) The development exploits opportunities to make the sites' location more sustainable means of transport including maximising walking, cycling and public transport."
Berrys for Bradford Estates	AGT24-006-01-02	Policy EC4	LATE SUBMISSION Bradford Estates support this policy, it enables sustainable economic growth in rural areas whilst utilising buildings which would otherwise lie redundant. The policy fully acknowledges that certain businesses cannot be accommodated within village boundaries and therefore provides opportunity to rural businesses to thrive in existing buildings.	Not stated	Not stated	Not stated	Comments noted.
Marsh, J	RES24-140-07	Policy EC4	The land in Wombourne is currently cow fields, with rural buildings on it. Queries how this policy deals with the bulldozing of these cow fields to make new build houses?	Not stated	Not stated	Not stated	Not relevant to this policy. Housing allocations have been considered through the Housing Site Selection Topic Paper taking into account site specific factors.

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**CHAPTER 10 & POLICIES EC1-EC7: BUILDING A STRONG LOCAL ECONOMY**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							No change proposed.
JMS Planning for Wolverhampton Halfpenny Green Airport	AGT24-023-01-01	Policy EC4	JMS Planning supports the employment policies that are set out in the local plan, especially in relation to the diversification of the rural economy again seek for clarification on the interaction of policies. EC4 details rural employment both within and beyond the settlement boundary. It is important that the interaction between Green Belt and Employment policies is clear. This is especially relevant since evidence base document EDNA Update 2024 (see para 10.13). it is noted that there is conflict with NPPF Paragraph 89 outlined previously. Part 2 of the policy (Rural employment outside development boundaries) presents six requirements including that 'e) the development is accessible by a choice of means of transport including walking, cycling and public transport'. This is in direct conflict with paragraph 89 and it is recommended that additional wording is added, to the effect of '... or if not accessible by these means that contributions are made to improve the accessibility of the site.' Likewise, the penultimate sentence to EC4 relating to proposals being 'easily accessed by public transport, foot and cycle modes' should also be edited. Policy EC4 is not consistent with the Framework and cannot be found sound.	Not stated	No	Not stated	<b>Minor modification 027:</b>  <b>e) The development exploits opportunities to make the sites' location more sustainable means of transport including maximising walking, cycling and public transport.</b>
<b>POLICY EC5: TOURISM</b>							
Berrys for Bradford Estates	AGT24-006-01-02	Policy EC5	LATE SUBMISSION Bradford Estates support this policy. The policy acknowledges that there can be a need for tourism outside of development boundaries and this fluidity, will allow for small-scale tourism to reach rural areas which it otherwise would not.	Not stated	Not stated	Not stated	Comments noted.
JMS Planning for Wolverhampton Halfpenny Green Airport	AGT24-023-01-01	Policy EC5	EC5 point be is in direct conflict with paragraph 89 and it is recommended that additional wording is added, to the effect of '... or if not accessible by these means that contributions are made to improve the accessibility of the site.' EC5 is not consistent with the Framework and cannot be found sound. Their clients site (Land South of Crab Lane) could present an opportunity for rural tourism, with precedent set in the local vicinity for temporary camping or tourist accommodation (with the temporary nature of development not impacting on encroachment into the countryside).	Not stated	No	Not stated	The policy seeks to ensure that tourist accommodation is sustainability located to ensure those frequenting the accommodation can access it via a range of travel modes and are not reliant on private vehicle whilst staying at the accommodation.  No change proposed.
<b>POLICY EC6: RURAL WORKERS DWELLINGS</b>							
							No representations received.
<b>POLICY EC7: EQUINE RELATED DEVELOPMENT</b>							
							No representations received.

**CHAPTER 11 & POLICIES EC8-EC13: COMMUNITY SERVICES, FACILITIES AND INFRASTRUCTURE**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
<b>GENERAL ISSUES: CHAPTER 11 (inc specific paras references)</b>							
Watt, J	RES24-246-10	11.1	Stafford town centre is very run down with many shops closed, any increase in population will not bring any more money into the town as there is very little to spend it on.  Site 036c should remain as agricultural land.	No	No	No	Comments noted.
Watt, J	RES24-246-11	11.9	Very poor mobile phone reception on Wildwood especially the area near proposed site 036c – land south of Stafford.  Site 036c should remain as agricultural land.	No	No	No	Comments noted.
<b>POLICY EC8: RETAIL</b>							
Goldfinch Town Planning Services	AGT24-020-01-01	Policy EC8	Goldfinch Town Planning Services maintains its view that the complex economic landscape described above has not been effectively shaped into the policy drafting being taken forward within South Staffordshire District Council's Publication Stage Report (April 2024). In particular, in relation to employment land policy and centres/ retail policies. As an interested outside observer we remain unconvinced that South Staffordshire District Council's Publication Stage Report (April 2024) will provide effective and deliverable planning policy solutions and interventions to prevent further levels of decline within many of the district's centres. As a key local stakeholder, we consider that the policy approaches on centres and retail lack sufficient ambition and do not provide effective planning policy interventions to help support struggling retailers in many of the district's centres.	No	No	No	The council commissioned a Retail Centres Study 2021 to inform the preparation of policy EC8. This evidence base document indicated that retail centres within the district are relatively strong with no indication of decline or a concerning number of struggling retailers. The council has used the recommendations from the study to draft policy EC8 and are confident that the policy approach(es) taken will support centres with vibrancy and vitality.  No change proposed.
Staffordshire County Council	STA24-044-10	Policy EC8	Policy (EC8) is supported, there are some good public health links made. Suggest that consideration be given to whether there is any scope for developing the retail policy further to include an approach that considers older people, for example, provision of rest spaces and public toilets etc. In relation to hot food takeaways we'd consider the possible inclusion of a further consideration in relation to health impact particularly in areas where obesity is an issue. This could be strengthened by reference obesity data for the district, which we can supply.	Yes	Yes	Yes	Whilst the council recognises the importance of an appropriate public realm within retail centres, the local plan policy approach can only deal with the matters set out in section 7 (Ensuring the vitality of town centres) of the NPPF. The council considers that Policy EC8 is in conformity with this.  Obesity/poor public health has not been identified as a pressing issue in South Staffordshire though the evidence base. The council considers the approach taken to Hot Food Takeaways (HFTs) through Policy EC8 is appropriate.  No change proposed.
Walsingham Planning for Lidl	AGT24-043-01-02	Policy EC8	Policy EC8 does not reflect the positive and flexible approach to plan-making set out in Paragraph 90 of the NPPF and so is inconsistent with national policy. EC8 states that proposals will maintain and enhance the vitality and viability of SS network of centres but in practice the policy does nothing to enhance the	Yes	No	Yes	The council is confident that Policy EC8 provides a sufficient policy approach that will support centres in terms of their vibrancy and vitality by allowing for E class uses, and non-E class uses where/when appropriate whilst also protecting them from



**CHAPTER 11 & POLICIES EC8-EC13: COMMUNITY SERVICES, FACILITIES AND INFRASTRUCTURE**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>vitality of town centres.</p> <p>The SS Retail Centres Study is informed by a Household Shopping Survey – shows that much of residents’ shopping is done outside of the district.</p> <p>EC8 should be amended to recognise the need for new convenience provision within Penkridge, and it should allocate Site 420 for a supermarket of approximately 2,500sq.m to cater for the convenience retail needs of Penkridge and its growing population.</p>				<p>undue influences.</p> <p>A strategic network of centres has been established within the policy and identified on the proposed polices map.</p> <p>No change proposed.</p>
Walsingham Planning for Lidl	AGT24-043-01-02	Policy EC8	<p>These representations on behalf of Lidl are concerned with Penkridge, a large village at the top of the retail hierarchy. 68% of residents’ convenience expenditure is spent outside of the district altogether, in towns such as Stafford and Cannock. This is unsustainable as it encourages unnecessary travel.</p> <p>Penkridge has around 43 retail units, of which 6 are convenience use, of these only 2 could be described as supermarkets and a handful of other convenience units. This is supplemented by a twice weekly market.</p> <p>Such an approach should be reversed rather than maintaining the status quo advocated by the SSRCS or Policy EC8 itself. The approach does not comply with paragraph 90 of the NPPF and represents a lost opportunity.</p> <p>SA2, involving over 1000 new houses will compound the existing problem. SA2 includes the requirement for a ‘community hub’ which should include ‘local convenience retail to serve the new neighbourhood’. No level of floorspace is identified within the policy or concept plan but it seems likely that the convenience element will be no more than a neighbourhood shop (based on undetermined planning application).</p> <p>There is a need for a larger convenience store to serve Penkridge. EC8 fails to recognise the current deficiency.</p> <p>There are no sites of a suitable size for a supermarket in Penkridge, but there is within SA2 at the southern end of the allocation, immediately adjoining the existing settlement boundary and has a main road frontage. A Lidl supermarket on site will cater for the day-to-day convenience needs of Penkridge and will be a suitable solution for convenience provision.</p> <p>By failing to address the existing shortfall in convenience retail provision within the District, and particularly in Penkridge, Policy EC8 is not sound because it has not been positively prepared, it does not represent an appropriate and justified strategy and it will not be effective or consistent with planning for town centres.</p> <p>Change as per Rep ref 6276</p>	Yes	No	Yes	<p>The council commissioned a Retail Centres Study 2021 to inform the preparation of policy EC8. This evidence base document did not indicate that there was a need for additional retail floorspace allocations (Recommendation 1). There was no evidence to suggest a new centre was required to be designated in either proposed strategic residential allocation in this plan or for new retail provision in specific settlements. Both policies SA1 and SA2 allow for small local convenience retail provision, at this stage it is the quantum of floorspace to be delivered is unknown. Any retail floorspace on these sites will be required to meet the requirements of Policy EC8.</p> <p>No change proposed.</p>
Cerda for Trine Developments	AGT24-011-02-01	Policy EC8	<p>The provision of retail for SA2 could undermine this policy. The services and facilities of Penkridge are within a mile of the allocation and any new provision may detract from the village</p>	Yes	No	Yes	Comments noted.

**CHAPTER 11 & POLICIES EC8-EC13: COMMUNITY SERVICES, FACILITIES AND INFRASTRUCTURE**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			centre.				
Evolve Planning & Design for Bloor Homes	AGT24-017-01-09	Policy EC8	Land East of Bilbrook - The Policy is not clear whether the net floorspace thresholds identified within EC8 for the provision of impact assessments will apply to the Strategic Development Locations.	Not stated	Not stated	Not stated	Both policies SA1 and SA2 allow for small local convenience retail provision. Any retail floorspace on these sites will be required to meet the requirements of Policy EC8.  No change proposed.
Brewood Civic Society	STA24-008-08	Policy EC8	Brewood Civic Society supports Policy EC8: Retail. Our Designated Centre, Brewood Market Place needs the protection of this Policy in order to maintain and enhance the vitality and viability of the village.	Not stated	Not stated	Not stated	Comments noted.
<b>POLICY EC9: PROTECTING COMMUNITY SERVICES AND FACILITIES</b>							
NHS Property Services	STA24-034-01	Policy EC9	NHSPS supports the provision of sufficient, quality community facilities but in line with our previous response, we do not consider the proposed policy approach to be positively prepared or effective in its current form. Where healthcare facilities are included within the Local Plan's definition of community facilities, policies aimed at preventing the loss or change of use of these can potentially have a harmful impact on the NHS's ability to deliver essential facilities and services for the community.  All NHS land disposals must follow a rigorous process to ensure levels of healthcare services are maintained or enhanced and proceeds from sales are reinvested in the provision of healthcare services. Sites can only be disposed of once the operational health requirement has ceased. Where it can be demonstrated that health facilities are surplus to requirements or will be changed as part of wider reorganisation, it should be accepted that a facility is neither needed nor viable, and policies should support the principle of alternative use. Delete 'both of' in the first paragraph  Add – where healthcare facilities are formally declared surplus to the operational requirements of the NHS or identified as surplus as part of a published estates strategy or transformation plan, the requirements listed under parts a and b of the policy will not apply.	Not stated	Not stated	Not stated	Comments noted.  It is not considered necessary to remove "both of" from policy EC9. Whilst it may seem overly prescriptive in terms of the NHS owned facilities, it is important to note that the policy is applicable to all community facilities and services and therefore the requirement to satisfy both elements of the policy is appropriate.  It is acknowledged that the NHS have a land disposals protocol that is followed when premises / operational health requirements cease. This rigorous process would be presented to the Local Authority to evidence fulfilment of criteria a. Criteria b will need to be fulfilled as an existing community building/facility that is no longer required would need to be marketed for an alternative community service or facility for a sufficient period of time prior to it being sold or used for a non-community use.  No change proposed.
Sport England	STA24-042-06	Policy EC9	Policy still lists sport venues within the supporting text as being part of the remit of the policy. The criteria identified in the policy in relation to such venues would not be compliant with NPPF 103 which requires a need assessment to be submitted. Should be noted that sporting venues can meet a need greater than the local community e.g. stadia.  If to be retained within the remit of the policy, a needs assessment would be required to demonstrate that the facility is	Yes	No	Yes	Policy HC18 does already cover loss of sports facilities and therefore it is agreed that reference in the supporting text to sports venues can be removed.  <b>Minor modification 029:</b>  community buildings and meeting places, sports venues, cultural buildings, places of worship and

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			surplus to requirement and a replacement facility should be equivalent in quantity and quality. It should be noted that certain sites meet a wider than local need.				health facilities.
The Theatres Trust	STA24-048-01	Policy EC9	Following earlier representation Theatres Trust remains supportive of the approach set out in Policy EC9 in terms of supporting services and facilities and protecting existing facilities. This would be consistent with paragraph 97 of the NPPF (2023).	Not stated	Not stated	Not stated	Comments noted. No changes proposed.
<b>POLICY EC10: WOLVERHAMPTON HALFPENNY GREEN BUSINESS AIRPORT</b>							
Bobbington Parish Council	STA24-006-01	Policy EC10	Request a statement is included around limitation of the size of aircraft and helicopters using Wolverhampton Halfpenny Green Airport as a safeguard against unwarranted expansion. Wolverhampton Halfpenny Green Airport is situated within the Green Belt in a quiet rural area surrounded by attractive countryside. The site is served by rural roads as there is a lack of strategic road access or public transport. The Council supports the existing General Aviation role of the airport and also recognises the importance of the existing non-aviation uses on the site for the viability of the airport. The Council considers that continuing with the current general aviation role of the Airport with a 'gentle evolution' within the existing defined role and boundaries, and with limitations on the type and maximum size of aircraft and helicopters using the airport, to be the right balance to supporting adaptation, where necessary, whilst respecting the character of the rural environment. the protection of the green belt and the environment are key objectives for the council and reflect the views of the residents and local communities in south staffordshire.	Yes	No	Yes	The type and size of aircraft is a licencing matter for the owners of Wolverhampton Halfpenny Green Airport, rather than something that can be enforced through the planning process.  No change proposed.
JMS Planning for Wolverhampton Halfpenny Green Airport	AGT24-023-01-01	Policy EC10	The Local Plan sets out the aspirations for Wolverhampton Halfpenny Green Airport from paragraph 11.5 of the Local Plan. JMS Planning supports the Council's recognition of a) the general aviation role of the airport and b) the importance of the non-aviation uses at the airport.	Not stated	Not stated	Not stated	Comments noted. No changes proposed.
Bobbington Parish Council	STA24-006-02	Policy EC10	Suggest that the policy includes the requirement to develop a Masterplan in order to maintain oversight of proposed future developments and expansion of the airfield. The Council will continue to work with the Airport owners and operators to deliver a sustainable future for the airport, THROUGH THE PREPARATION AND DEVELOPMENT OF AN AIRPORT MASTERPLAN. The replacement of obsolete wartime buildings with new high quality development will generally be supported, subject to being consistent with other Local Plan policies. The existing non-aviation uses on the site are accepted, but the overall aim is that existing buildings AND THE SITE GENERALLY should be used for aviation uses related to the general aviation role of the airport.	Yes	No	Yes	It is not considered appropriate to require the airports owners to develop a masterplan, however if one was prepared that the Council deemed satisfactory in planning terms then this could be supported. It is not considered necessary to reference this within the policy.  No change proposed.

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
Emery Planning for Wolverhampton Airport Ltd	AGT24-016-03-01	Policy EC10	Our client is supportive of the potential for delivering a business and masterplan for the future development of the site, alongside relevant stakeholders, to ensure a vibrant and viable future for the airport, recognising the important and positive role it can play in the economy of South Staffordshire.	Not stated	No	Not stated	Comments noted.  No changes proposed.
Emery Planning for Wolverhampton Airport Ltd	AGT24-016-03-01	Policy EC10	It is considered that in its current form, the policy is overly restrictive and does not build on the aspirations for developing the aero industry as expressed through policy EC1. Policy EV13 of the Core Strategy refers to the ability to carry out development outside of the identified developed area under permitted development or development which is required for the safe and efficient operation of the Airport – this reference should be carried forward to EC10.	Not stated	No	Not stated	Comments noted.  It is not considered necessary to confirm that permitted development is acceptable as by definition, this will be the case. The airport is washed over by green belt and therefore non permitted development would need to demonstrate very special circumstances (vsc) outside the developed area. Proposals for the safe and efficient operation of the airport could plausibly demonstrate vsc on a case-by-case basis, but it is not considered necessary to pre-empt this by confirming through this policy that such proposals are supported.  No change proposed.
Emery Planning for Wolverhampton Airport Ltd	AGT24-016-03-01	Policy EC10	The extent of the existing developed area as shown on Inset Plan 43 is restricted to the extent of the existing buildings on site and the Policy should reflect that the inclusion of the existing developed area as identified on the proposals map, is not determinative of the full extent of the area of previously developed land at Halfpenny Green Airport. The area of land considered previously developed land plainly extends beyond the existing developed area identified on the plan and should encompass the entirety of the operational area of the airport. The runways and access roads which intersect the wider site clearly comprise fixed surface infrastructure, with the full extent of the airport site, meeting the definition of PDL.	Not stated	No	Not stated	The extent of the developed area proposed in the Local Plan under Inset Plan 43 mirrors that within the South Staffordshire Core Strategy and is considered sufficient to allow for appropriate development within that area.  The full extent of the airport is shown on the full interactive districtwide policies map.  No changes proposed.
Emery Planning for Wolverhampton Airport Ltd	AGT24-016-03-01	Policy EC10	The policy should seek to support the role of Halfpenny Green Airport as a light aircraft airfield for private, business, tourism, recreational and relevant commercial purposes in addition to supporting the site's role as an existing local business hub. It is welcomed that the policy acknowledges the important role that the existing non-aviation businesses present at the site. However, the policy only supports development proposals for infill development and replacement of existing buildings directly related to the general aviation role of the airport, this is considered to be overly restrictive.	Not stated	No	Not stated	Comments noted.  As stated, the policy recognises that the non-aviation businesses currently present on-site support the viability of the Airport. However, it is imperative that the rural environment of the Airport is respected, and that the role of the site remains predominantly aviation based. As such, the policy requirement that development proposals be directly related to the general aviation role of the site is considered appropriate.  No changes proposed.
JMS Planning for Wolverhampton	AGT24-023-01-	Policy EC10	Historically, land south of Crab Lane was also within the Halfpenny Green Airport with the entirety of the area used for	Not stated	Not stated	Not stated	Site options have been assessed against a consistent set of planning criteria to determine

**CHAPTER 11 & POLICIES EC8-EC13: COMMUNITY SERVICES, FACILITIES AND INFRASTRUCTURE**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
Halfpenny Green Airport	01		barracks, as the map below illustrates. This is important since it establishes that land south of Crab Lane is a) previously developed land and b) could have a similar Green Belt score as per Parcel S76 above. The Council's clarification on this point is sought and whether Policy EC10 should be extended to include south of Crab Lane, or, if this is not applicable this, guidance on what policy relationship land south of Crab Lane has to the proposed EC10 airport and the existing development area. JMS Planning raises this point since this speaks to the importance again of the rural economy and the potential that sites such as Land South of Crab Lane may hold.				<p>proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The council's Green Belt Study (2019) takes a strategic view for considering the harm of releasing land from the Green Belt. Its methodology ensures that if there are variations to the harm of releasing land from the green belt within the wider land parcel, then this is reflected in the assessment results.</p>
JMS Planning for Wolverhampton Halfpenny Green Airport	AGT24-023-01-01	Policy EC10	Suitable development at the site 'Land South of Crab Lane' could be in a range of forms, as long as this does not undermine purpose 3 and 5 of the Green Belt assessment. Given the overriding goal of the area via Policy EC10 to support the rural economy at Halfpenny Green Airport, the site offers good potential for supporting development. This could take the form of conversion of existing buildings into business space to support aviation or businesses related to the rural economy (and in turn regeneration in terms of Green Belt Purpose 5).	Not stated	Not stated	Not stated	<p>Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.</p> <p>The council's Green Belt Study (2019) takes a strategic view for considering the harm of releasing land from the Green Belt. Its methodology ensures that if there are variations to the harm of releasing land from the green belt within the wider land parcel, then this is reflected in the assessment results.</p> <p>Justification for the council's spatial strategy and approach of focusing Green Belt release on its most sustainable Tier 1 settlements is detailed in our Exceptional Circumstances Topic Paper 2024 and Spatial Housing Strategy Topic Paper 2024. This balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p>
<b>POLICY EC11: INFRASTRUCTURE</b>							
Wombourne Parish Council	STA24-052-01	Policy EC11	The evidence of consultation with the Highways Authority and seriousness with which that Authority has taken to examining the effects that traffic generated by new housing sites will have on existing settlements continues to raise concern. While we accept South Staffordshire District Council has limited impact	Not stated	Yes	Not stated	Engagement throughout plan preparation has taken place with Local Highways Authority (Staffordshire County Council). They have indicated that the impact of the proposed allocations would not generate any significant



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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			upon this, it is expedient upon the Authority to pursue meaningful consideration of this issue from County Highways. As part of the Local Plan Review the Highways Authority should have been asked for a 'Traffic Impact Assessment' on settlements. Adding hundreds of new dwellings will exacerbate congestion and compromise highway safety. Concerns that decisions remain at risk of being left to piece-meal negotiation with developers and landowners of individual sites. We remain keen to see published formulas for financial/provisional contributions that would give us greater confidence.				impacts on the transport network or highway safety that cannot be mitigated in line with paragraph 114 d of the NPPF.
Dudley Metropolitan Borough Council	STA24-015-07	Policy EC11	Consider the policy to be sound and particularly supports the reference to developers and landowners being expected to work positively with neighbouring authorities as part of infrastructure provision considerations. There are no housing or employment land allocations along the shared border with Dudley proposed in the South Staffordshire Local Plan and there have been no implications identified in respect of cross-boundary transport or other infrastructure matters to date, we support the reference to working with neighbouring authorities on all cross boundary infrastructure matters and request that this continues as the plan progresses. South Staffordshire DC and Dudley MBC continue to work together and with other relevant stakeholders, such as Sustrans, on specific infrastructure projects where applicable including cycling/active travel links e.g. between Kinver and Dudley Borough.	Yes	Yes	Yes	Comments and support noted.  No changes required.
City Wolverhampton Council	STA24-012-01	Policy EC11	Concerned that in terms of transportation infrastructure specifically, further work is required to understand the combined impact of the South SSLP development proposals and potential WLP developments on the wider transport network. Happy to discuss the scope of this work with you including the relationship with transportation assessments being undertaken in support of the Wolverhampton Local Plan.	Yes	No	Yes	Comments noted.  South Staffordshire will continue to work collaboratively with the City of Wolverhampton Council on transportation infrastructure and potential impacts on the wider transport network.
City Wolverhampton Council	STA24-012-01	Policy EC11	In terms of cross-boundary infrastructure, the deletion of the development sites currently located within the green belt on the edge of Wolverhampton has removed the majority of the infrastructure concerns identified in our response to the previous Regulation 19 consultation.	Yes	No	Yes	Comments and support noted.  No changes proposed.
Robson, A	RES24-200-01	Policy EC11	Existing roads not fit for purpose due to collapsed drains from local quarries, large heavy lorries, blind bends, unreliable traffic lights. Increase of demand of water supply and electric.  Unreliable public transport, limited parking encourages dangerous parking by schools.	Not stated	No	Not stated	Engagement throughout plan preparation has taken place with Local Highways Authority (Staffordshire County Council). They have indicated that the impact of any of the proposed allocations would not generate any significant impacts on the transport network or highway safety that cannot be mitigated in line with paragraph 114 d of the NPPF.

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Cerda for Trine Developments	AGT24-011-02-01	Policy EC11	EC11 establishes suitable and balanced infrastructure for implementing the proposed development. For Penkridge, the approach changes little from the previous Regulation 19 plan.	Yes	No	Yes	Comments noted. No changes proposed.
Evolve Planning & Design for Lovell Homes	AGT24-017-05-01	Policy EC11	Lovell Homes supports the Council's proposed infrastructure led strategy which seeks to focus development towards larger and better-connected settlements. It is committed to engaging with the Council and other stakeholders to explore infrastructure requirements to inform future iterations of the Infrastructure Delivery Plan and the emerging proposal for Pool House Road.	Not stated	Not stated	Not stated	Comments and support noted. No changes proposed.
Evolve Planning & Design for Keon Homes	AGT24-017-04-01	Policy EC11	Keon Homes supports the Council's proposed infrastructure led strategy which seeks to focus development towards larger and better-connected settlements.	Not stated	Not stated	Not stated	Comments and support noted. No changes proposed.
Evolve Planning & Design for Four Ashes Road Ltd	AGT24-017-03-01	Policy EC11	Four Ashes Road Ltd supports the Council's proposed infrastructure led strategy which seeks to focus development towards larger and better-connected settlements. Four Ashes Road Ltd is committed to engaging with the District Council and other stakeholders to explore all infrastructure requirements to inform future iterations of the Infrastructure Delivery Plan.	Not stated	Not stated	Not stated	Comments and support noted. No changes proposed.
Evolve Planning & Design for Cameron Homes	AGT24-017-02-01	Policy EC11	Cameron Homes supports the Council's proposed infrastructure led strategy which seeks to focus development towards larger and better-connected settlements. It is committed to engaging with the Council and other stakeholders to explore infrastructure requirements to inform future iterations of the Infrastructure Delivery Plan and the emerging proposal for Cameron Homes sites.	Not stated	Not stated	Not stated	Comments and support noted. No changes proposed.
Evolve Planning & Design for Bloor Homes	AGT24-017-01-09	Policy EC11	Bloor Homes supports the Council's proposed infrastructure led strategy which seeks to focus development towards larger and better-connected settlements. It is committed to engaging with the Council and other stakeholders to explore infrastructure requirements to inform future iterations of the Infrastructure Delivery Plan and the emerging proposal for Land East of Bilbrook.	Not stated	Not stated	Not stated	Comments and support noted. No changes proposed.
National Grid Electricity Distribution (Lucy White Planning)	STA24-030-01	Policy EC11	In preparing development plans, local planning authorities (LPA) have a duty to safeguard the operation of National Grid's infrastructure to enable NGED to supply electricity in the most efficient and cost effective manner. In the majority of cases this will involve retention of the existing infrastructure in situ, including overhead power lines and pylons.  NGED strongly recommends that local planning authorities ensure that they feed into the Distribution Futures Energy Scenario process by emailing <a href="mailto:nged.energyplanning@nationalgrid.co.uk">nged.energyplanning@nationalgrid.co.uk</a> and that you contact them at the earliest possible opportunity for confirmation of the National Grid's capacity to accommodate planned growth in their area. If capacity is limited, LPAs should explore alternative locations for growth which may be less constrained or allocate	Not stated	Not stated	Not stated	Comments noted. National Grid have been consulted at all stages of plan preparation. No changes proposed.

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			land, in consultation with NGED, to accommodate a new sub-station. NGED should also be involved in the masterplanning of any development allocation which includes a large sub-station.  NGED does not object to the allocation of land upon which its infrastructure is present, however, in the context of the Government's commitment to reach Net Zero by 2050 and the role which National Grid has to play in delivering significant new infrastructure to meet existing and future energy demands, all reasonable efforts should be made by LPAs and developers to safeguard to retain the existing grid infrastructure and the associated embodied carbon.				
Pegasus Group for Richborough Estates	AGT24-030-05-02	Policy EC11	Any assessment of cumulative impact and mitigation requested must be proportionate and CIL Regulation 122 complaint – the policy should be explicit that this is the case. The policy ought to make clear that infrastructure contributions can take a number of forms. The policy is unsound as it is neither justified not consistent with national policy.	Yes	No	Yes	Comments noted.  The requirements for planning obligations are set out in NPPF (December 2023) paragraph 57 and it is not therefore considered necessary to repeat these within the policy.
Pegasus Group for Clowes Developments	AGT24-030-02-02	Policy EC11	Any assessment of cumulative impact and mitigation requested must be proportionate and CIL Regulation 122 complaint – the policy should be explicit that this is the case. The policy ought to make clear that infrastructure contributions can take a number of forms. The policy is unsound as it is neither justified not consistent with national policy.	Not stated	No	No	Comments noted.  The requirements for planning obligations are set out in NPPF (December 2023) paragraph 57 and it is not therefore considered necessary to repeat these within the policy.
Pegasus Group for Persimmon Homes	AGT24-030-04-01	Policy EC11	Any assessment of cumulative impact and mitigation requested must be proportionate and CIL Regulation 122 complaint – the policy should be explicit that this is the case. The policy is unsound as it is neither justified not consistent with national policy.	Not stated	No	Not stated	Comments noted.  The requirements for planning obligations are set out in NPPF (December 2023) paragraph 57 and it is not therefore considered necessary to repeat these within the policy.
Taylor, G	RES24-232-01	Policy EC11	The plan does not take adequate consideration to the existing capacity of the local schools, which are already full. Any additional houses within this area will add to the existing traffic, which uses Acton Hill Road as a short cut to M6 Jnc 13. This lane is narrow and has limited passing places and worn grass bank verges. Medical facilities are already stretched with the increase in houses already planned for Penkridge and Dunston. If site 036c were to be developed this would aggravate the existing damaging situation.	No	No	No	Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies. Engagement throughout plan preparation has taken place with Local Highways Authority, School Organisation Team (SOT) (both Staffordshire County Council), and Staffordshire and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical Commissioning Group). None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities, or addressed through proposed

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							Policies HC14, and HC15.
Marsh, J	RES24-140-08	Policy EC11	At a consultation event, the planners could give no exact details of how infrastructure would be improved or even maintained at its current level to support an additional 250 homes and 500 cars in Wombourne. It was vague "there has to be some," "we make sure the developers contribute towards that." Not a single solid answer to how the village can cope with the extra traffic, extra burden on the doctors surgery, extra burden on care provision, extra burden on the schools. There is no plan.	Not stated	Not stated	Not stated	Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies. Engagement throughout plan preparation has taken place with Local Highways Authority, School Organisation Team (SOT) (both Staffordshire County Council), and Staffordshire and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical Commissioning Group). None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities, or addressed through proposed Policies HC14, and HC15.
Wyatt, B	RES24-261-01	Policy EC11	<p>The plan has not been subject to effective DtC with Stafford BC. Concerns as to the ability of schools and health facilities to cater for increased demand.</p> <p>Inconsistent with Policies EC9 (Protecting community services and facilities), EC11 (Infrastructure), EC12 (Sustainable transport), and HC15 (Education).</p> <p>Positive score in the Housing Site Selection Topic Paper based on proximity to schools is not the same as access or availability. Stafford BC's Education Site Assessment scored 'Stafford South' Red; 'no mitigation possible'.</p> <p>Increase in traffic on already congested and dangerous roads, and increased air pollution.</p> <p>Site 036c is an unsustainable location for growth. Despite its proximity to Stafford, it is a rural community with poor public transport, where private vehicles will be required for most journeys.</p> <p>Site 036c should be deleted from the plan.</p>	No	No	No	<p>Stafford Borough Council (SBC) and SSDC have an agreed SoCG that addresses Duty to Cooperate matters effectively that both parties consider to be sound and lawful as set out in the Duty to Cooperate Topic Paper 2024.</p> <p>Implications for local services and infrastructure have been assessed alongside the relevant responsible bodies. Engagement throughout plan preparation has taken place with Local Highways Authority, School Organisation Team (SOT) (both Staffordshire County Council), and Staffordshire and Stoke on Trent Integrated Care Board (formerly Stafford and Surrounds Clinical Commissioning Group). None of which have indicated that the impact of the proposed development would have significant or unmitigable impact on their respective infrastructure responsibilities, or addressed through proposed Policies HC14, and HC15. Any infrastructure assessment by Stafford BC would have been in relation to sites within Stafford's administrative area.</p> <p>The 'development management' policies included in the plan are designed to guide future planning applications, as site assessment matters have been dealt with in identifying suitable sites for allocation as detailed in the Housing Site Selection Topic Paper 2024.</p> <p>There is a bus route along the A34 Cannock Road that provides a regular service into Stafford Town and the railway station.</p>

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							No change proposed.
NHS Property Services	STA24-034-01	Appendix A	<p>Viability Assessment</p> <p>Where contributions towards healthcare have been identified in the policy requirements for site-specific testing, the assessment does not include a specific allowance for contributions towards healthcare.</p> <p>The S106 headroom identified as part of the site-specific testing is generally sufficient to enable financial contributions to be secured for healthcare and therefore the policy requirements in relation to this are deliverable. However, there is concern that without explicit mention of required healthcare mitigation in the viability assessment, it will compete with other planning obligations or be ignored entirely, rendering development unsustainable and putting health at risk.</p> <p>Recommend that the viability assessment includes a separate cost input for typologies where a healthcare contribution is expected. This would ensure that healthcare mitigation is appropriately weighted when evaluating the potential planning obligations necessary to mitigate the impact of development. A separate cost input would mean developers are adequately informed in advance and would also support the effective implementation of policy EC11 in situations when a viability assessment demonstrates that development proposals are unable to fund the full range of infrastructure requirements. Welcome further engagement with the Council to determine a reasonable cost assumption.</p>	Not stated	Not stated	Not stated	<p>Please see the Further Note on Viability: Follow-up to Regulation 19 Consultation (November 2024).</p> <p>Allowances have been made for healthcare contributions for the site-specific testing – see Appendix 1 of the Viability Study 2022. A reasonable allowance for S106 costs has been made within the site typologies testing. The Council considers this an appropriate approach for viability testing Policy EC11 and HC14 alongside all other policy requirements. The Viability Study has demonstrated these to be deliverable, therefore there is no evidence to suggest healthcare contributions could not be secured for relevant sites.</p> <p>No change proposed.</p>
<b>POLICY EC12: SUSTAINABLE TRANSPORT</b>							
Kinver Parish Council	STA24-025-09	Policy EC12	<p>While we welcome this policy, we believe it should contain explicit reference to cooperation with adjacent authorities, notably the Combined Authority, since so many settlements (including Kinver) have their main or only public transport links to the conurbation, rather than to other parts of Staffordshire. We also consider that the LCWIP should include more focus on smaller settlements, for whom good cycling routes could provide a credible alternative to car travel when public transport is inadequate</p>	Not stated	Not stated	Not stated	<p>The supporting text for Policy EC12 states that the Local Authority will continue to work "with partners including Staffordshire County Council, neighbouring highways authorities, National Highways, Network Rail. . . "It is clear from the supporting text that the Local Authority intends to continue collaborative work with neighbouring authorities and therefore it is not considered necessary to include a list of authorities within the policy itself.</p> <p>Comments noted regarding the LCWIP.</p>
Natural England	STA24-033-01	Policy EC12	<p>The plan is not sound or legally compliant due to the impacts of Air Quality in relation to internationally designated nature conservation sites. We agree with the conclusion of the Habitats Regulation Assessment that for those European sites in the area of search with features sensitive to air pollution, adverse effects on their integrity, alone or in-combination, cannot be ruled out due to this lack of evidence. Once evidence is provided and an assessment is made, amendments are likely to be then required</p>	No	No	Yes	<p>The Council has prepared an air quality evidence base and agreed a Statement of Common Ground with Natural England which is currently in the process of being signed. This confirms the ongoing cooperation on this issue and confirms we can now rule out adverse effects on site integrity of all relevant designated sites. An update to our HRA has been produced to confirm this.</p>



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			to reflect any new evidence informed approaches that deal with the air quality impacts upon these European designated sites is progressed. A statement of common ground between parties should reflect this.				
City Wolverhampton Council	STA24-012-01	Policy EC12	It is essential that development links effectively to the strategic transport network and avoids excessive pressure on sensitive transport links, that effective sustainable transport solutions are provided to connect essential trips to the local network, and that developments seek to minimise trip generation through all available mechanisms.	Yes	No	Yes	Comments noted.  No changes proposed.
City Wolverhampton Council	STA24-012-01	Policy EC12	Disappointing that the SSLP does not safeguard land for a rail-based park and ride north of the M54, which would have contributed towards the delivery of sustainable transport in Wolverhampton. It is appreciated that it will be challenging to bring this project forward during the Plan period without cross-subsidy from housing development. We request that the benefits of this proposal are recognised and that the Local Plan continues to promote a rail based park and ride north of M54 and other supporting infrastructure which increases access to the rail network.	Yes	No	Yes	Delivery of Brinsford Park and Ride remains an aspiration of the Council if it can be demonstrated to be feasible, however it is recognised that its suitability as a scheme remains uncertain with the West Midlands Combined Authority new stations report (February 2024) finding that enhancements to the existing bus network are likely to provide the best short to medium term solution, but this will be kept under review.  The Park and Ride remains an aspiration project in the Infrastructure Delivery Plan and can be revisited as part of future plan making should circumstances change.
Staffordshire County Council	STA24-044-11	Policy EC12	The Plan should fully recognise that any development needs to take appropriate measures to ensure the public path network is protected and improved in order to achieve both sustainable travel and health and well-being objectives. If any development is likely to affect the path network, either directly or indirectly, then section 106 funding and/or appropriate planning conditions should be imposed to improve the path network, through liaison with ourselves, at that time. This could also include situations where housing development is likely to lead to a rise in usage of the network in the vicinity of the development. Developments should be encouraged to enhance the existing path network where possible in line with Staffordshire County Council's Rights of Way Improvement Plan. This could include: <ul style="list-style-type: none"> <li>• the creation of public bridleways or the upgrading of public footpaths to bridleways to improve provision for horse riders and cyclists across Staffordshire where there is currently a shortfall in available access routes.</li> <li>• the creation and promotion of short circular walks to promote the health benefits of walking.</li> <li>• the replacement of stiles with gaps (where there are no stock) or gates (where there are) in line with Staffordshire County Council's Least Restrictive Principle for path furniture.</li> </ul>	Not stated	No	Not stated	Comments noted.  No changes proposed.
Avison Young for	AGT24-	Policy	Policy should be amended to recognise that the opportunities to	Yes	No	Not stated	Comments noted.

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Crest Nicholson	004-02-03	EC12	maximise sustainable transport will vary between urban and rural areas. The Policy should also be amended to make it clear that only "significant impacts" should be mitigated to an acceptable degree in accordance with Paragraph 114 of the NPPF. The requirement for a Transport Statement is also inconsistent with Paragraph 117 of the NPPF which states that transport statements are only required where developments will generate significant amounts of movement. The Policy should be amended accordingly. The Policy proposes to require proposals to adhere to the standards within LTN120. However, LTN1/20 is a guidance document not policy. Rigid application of LTN1/20 as policy rather than guidance is inflexible and inappropriate and could impact on the delivery of much needed housing in the District. Policy EC12 should, therefore, be amended to encourage compliance with LTN1/20 where possible. Part D of draft Policy EC12 is poorly worded and inconsistent with the NPPF which simply states that rights of way should be protected and enhanced. The wording should be amended to provide clarity and consistency with national policy.				<p>The policy states that mitigation is required "where a proposal is likely to have significant transport implications".</p> <p>It is considered that the requirement for a transport assessment and/or travel plan is in line with Paragraph 117 of the NPPF. The policy requires these documents where the proposal is a "major development" or "likely to have significant transport implications" – these proposals will likely generate significant amounts of movements and therefore compliant with the NPPF.</p> <p>It is appropriate to ensure that an acceptable alternative is provided should it not prove possible to protect an existing right of way.</p> <p>Whilst LTN/120 is a guidance document, the plan states that developments 'should adhere to the standards set out within LTN 120 or subsequent additions.', in effect making it a policy requirement. This is deemed appropriate, and if for some reason an applicant was unable to comply, then this would be to be considered by the case officer in the planning balance.</p> <p>No change proposed.</p>
Robson, A	RES24-200-01	Policy EC12	Transport links stretched due to growing numbers and unreliable services. Safety concerns with excess cars and lorries through one-way system.	Not stated	No	Not stated	<p>Comments noted.</p> <p>No change proposed.</p>
Lower Penn Parish Council	STA24-028-01	Policy EC12	LATE SUBMISSION There is some ambition to deliver better cycling and walking routes, the emphasis, in the absence of any comprehensive public transport network, is still on private car use. Cycling and walking appear to be treated as leisure activities and there is little to support or encourage the use of active travel to commute to main employment sites. Focusing development in what are considered the most sustainable locations is certainly the best approach, and will go some way to minimise the impact of ever increasing car use, however, this depends on new residents being able to utilise the transport options that are available, and the capacity of these options being suitable to the increased need in those locations. Currently, train and bus services in Bilbrook and Codsall are regular but infrequent, and users report that trains in particular are very busy at peak times. In addition, whilst there is a plan to deliver increased car parking at Codsall, bicycle storage at both locations remains	Not stated	Yes	Not stated	<p>Comments noted.</p> <p>No change proposed.</p>

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			very limited and rather poor (not in line with policy HC13) We hope these shortcomings will be addressed. In addition to the short-sighted approach to active travel and limited commitment to moving away from a reliance on car use, topography is often not taken into consideration. Cycling and walking as transport must allow the individual to take the shortest, most accessible route.				
Lloyd, K	RES24-136-15	Policy EC12	Bilbrook is not well served by public transport even though this is the criteria in which it has been selected for a large development. Public transport provision must be improved with more reliable and frequent services. In addition, cycle hire stations connecting with the wider West Midlands network should be available to encourage the use of bicycles to travel to Wolverhampton and environs eg Pendeford retail centre along NCN 81 in order to reduce reliance on motor vehicles.  Consideration should be given to an alternative bus route for No5 bus, along Lane Green Road. Years ago one did exist it was the route 534 (I think). This would give residents of the Bilbrook development a real travel choice, other than the car. In addition, a bus route which includes the i54 is essential.	Not stated	Not stated	Not stated	Comments noted.  Site options have been assessed against a consistent set of planning criteria to determine proposed allocations as set out in our Housing Site Assessment Topic Paper 2024.  The policy will ensure that all development (including proposed allocations) maximises opportunities for walking, cycling, and public transport usage, and deliver expanded provision to meet increased cumulative demand for bus and rail services and connections.  The Local Highways Authority (Staffordshire County Council) are responsible for bus routing in the district.
Pegasus Group for Richborough Estates	AGT24-030-05-02	Policy EC12	The wording of point B should be revisited to ensure consistency with NPPF Paragraph 115. Point e is unclear and lacks clarity in the context of the policy, it is unclear why a policy relating to sustainable transport is seeking to minimise the impact of noise. The policy is unsound as it is neither justified nor consistent with national policy.	Yes	No	Yes	Comments noted.  It is considered that the wording of point B is consistent with Paragraph 115 of the NPPF.  <b>Minor modification 031 –</b>  <b>e) Where required, appropriate mitigation to address the impacts of any increased traffic (including cumulative impacts) associated with the proposed development shall be provided, either through direct improvements or Section 106 contributions</b>
Pegasus Group for Clowes Developments	AGT24-030-02-02	Policy EC12	The wording of point B should be revisited to ensure consistency with NPPF Paragraph 115. Point e is unclear and lacks clarity in the context of the policy, it is unclear why a policy relating to sustainable transport is seeking to minimise the impact of noise. The policy is unsound as it is neither justified nor consistent with national policy.	Not stated	No	No	Comments noted.  It is considered that the wording of point B is consistent with Paragraph 115 of the NPPF.  <b>Minor modification 031 –</b>  <b>e) Where required, appropriate mitigation to</b>

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							<b>address the impacts of any increased traffic (including cumulative impacts) associated with the proposed development shall be provided, either through direct improvements or Section 106 contributions</b>
Pegasus Group for Persimmon Homes	AGT24-030-04-01	Policy EC12	The wording of point B should be revisited to ensure consistency with NPPF Paragraph 115. Point e is unclear and lacks clarity in the context of the policy, it is unclear why a policy relating to sustainable transport is seeking to minimise the impact of noise. The policy is unsound as it is neither justified nor consistent with national policy.	Not stated	No	Not stated	Comments noted.  It is considered that the wording of point B is consistent with Paragraph 115 of the NPPF.  <b>Minor modification 031 –</b>  <b>e) Where required, appropriate mitigation to address the impacts of any increased traffic (including cumulative impacts) associated with the proposed development shall be provided, either through direct improvements or Section 106 contributions</b>
Pegasus Group for Taylor Wimpey	AGT24-030-08-02	Policy EC12	The wording of point B should be revisited to ensure consistency with NPPF Paragraph 115. Point e is unclear and lacks clarity in the context of the policy, it is unclear why a policy relating to sustainable transport is seeking to minimise the impact of noise. The policy is unsound as it is neither justified nor consistent with national policy.	Not stated	No	Not stated	Comments noted.  It is considered that the wording of point B is consistent with Paragraph 115 of the NPPF.  <b>Minor modification 031 –</b>  <b>e) Where required, appropriate mitigation to address the impacts of any increased traffic (including cumulative impacts) associated with the proposed development shall be provided, either through direct improvements or Section 106 contributions</b>
National Highways	STA24-032-01	Policy EC12	National Highways welcomes the inclusion of specific policies within the Plan to address issues associated with transportation and we will work closely with developers and local highway authorities to support sustainable development and growth in the region.  The policy notes that all major developments or where a proposal is likely to have significant transport implications will be required to produce Travel Plans and Transport Assessments, with all other developments being required to submit a Transport Statement where appropriate. Regarding the management of travel demand, the Plan states that development proposals should minimise the need to travel by car and provide infrastructure to promote active travel.	Not stated	Not stated	Not stated	Comments and support noted.  No changes proposed.
National Highways	STA24-032-01	Policy EC12	National Highways also welcomes the inclusion of specific policies within the Plan to directly tackle climate change with	Not stated	Not stated	Not stated	Comments and support noted.

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**CHAPTER 11 & POLICIES EC8-EC13: COMMUNITY SERVICES, FACILITIES AND INFRASTRUCTURE**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			initiatives such as EC – 12 Sustainable Transport, designing for active travel, electric vehicle charging and designing for green infrastructure. We appreciate the effort taken in developing these policies and consider this to be aligned with the expectations set out in the National Planning Policy Framework and National Highways’ Net Zero Strategy.				No changes proposed.
Davison, J	RES24-053-02	Policy EC12	to sub section (b) add 'to include construction of footways on rural roads to provide safe walking links to other paths and to facilities including bus stops. Isolated metalled paths away from surveillance of housing and traffic shall not be considered 24 hour substitute provision due to perceived risk of assault'	Not stated	Not Stated	Not stated	Requirements for footpaths and pedestrian connectivity will be considered on a case-by-case basis by the highway’s authority reflecting site specific circumstances, and so it is not considered necessary for the plan to be more prescriptive on this.  No change proposed.
Marsh, J	RES24-140-09	Policy EC12	Planners cannot show that they have maximized any opportunities for sustainable travel. Anyone who had spent a morning in Wombourne during rush hour could tell you this. Using an example, in order to afford the mortgage on a property, work is a job 20 miles way in North Birmingham. This can’t be walked. There is no bus service. Wombourne has no train station. Options are either drive and join the M6. Or drive 30 minutes to Coseley train station. These plans change none of that but do add 500 cars to a single road.	Not stated	Not stated	Not stated	Planning applications and future development assessed following the adoption of the Local Plan will be subject to Policy EC12. It is not the role of Policy EC12 to fix existing deficiencies within the transport network. The policy will ensure that all development (including proposed allocations) maximises opportunities for walking, cycling, and public transport usage, and deliver expanded provision to meet increased cumulative demand for bus and rail services and connections.  Notwithstanding the above, engagement throughout plan preparation has taken place with Local Highways Authority (Staffordshire County Council). They have not indicated that the impact of the proposed allocation would not generate any significant impacts on the transport network or highway safety that cannot be mitigated in line with paragraph 114 d of the NPPF.
Harper-Wallis, S	STA24-022-04	Policy EC12	This policy promotes sustainable and integrated transport solutions crucial for South Staffordshire District's growth and quality of life. Collaborating with partners to enhance bus and rail services addresses increased demand from new developments, ensuring efficient public transport options. Developing a Local Walking & Cycling Infrastructure Plan fosters active travel, reducing congestion and environmental impact. Requiring major developments to provide Transport Assessments and Travel Plans ensures that sustainable travel is maximized and mitigates negative impacts. Designing new developments to prioritize walking, cycling, and public transport creates safer, more accessible communities, while protecting existing routes preserves essential connectivity.	Not stated	Not stated	Not stated	Comments noted.  No changes proposed.
Staffordshire County Council	STA24-044-11	Appendix A	In comments made by SCC at the previous R19 consultation, it was suggested including the Local Transport Plan (LTP) as a key	Yes	Yes	Yes	Comments noted



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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			document in Appendix A (Key evidence and Topic Papers). The LTP will help inform decision making on transport matters for planning applications and will be used for future Plan/Policy reviews. This is still missing from Appendix A and therefore should be included. The Local Transport Plan (LTP) is still missing from Appendix A and therefore should be included.				Minor Modification 056: P.164 under infrastructure heading add <b>Local Transport Plan</b>
<b>POLICY EC13: BROADBAND</b>							
Turley Associates for Bellway Homes	AGT24-041-01-02	Policy EC13	Please refer to our previous representations made in December 2022 on this matter at Appendix 1. 2022 Rep – Bellway will work to provide modern and future-proof infrastructure provision within sites to be delivered.	No	No	No	Comments noted. No changes proposed.
Harper-Wallis, S	STA24-022-05	Policy EC13	From a planning perspective, requiring gigabit-capable connectivity in new developments in South Staffordshire District ensures future-proof infrastructure, essential for economic growth and quality of life. This policy promotes digital inclusion, attracting businesses and residents who rely on high-speed internet. Mandating full fibre connectivity or justified alternatives ensures all developments meet modern technological standards. Providing appropriate ducting facilitates future upgrades, minimizing disruption. Supporting community-led broadband initiatives fosters local engagement and addresses specific needs effectively. Aligning development proposals with Local Plan policies ensures a cohesive approach to infrastructure development, enhancing overall community resilience and sustainability.	Not stated	Not stated	Not stated	Comments noted. No changes proposed.

**CHAPTER 12 & POLICIES NB1-NB4: PROTECTING AND ENHANCING THE NATURAL ENVIRONMENT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
<b>GENERAL ISSUES: CHAPTER 12 (inc specific paras references)</b>							
Goldfinch Town Planning Services	AGT24-020-01-01	12.1	The majority of new housing development and commercial development proposals which have come forward within the district over the last 10 years have all failed to include effective on-site biodiversity enhancement features. Such as micro-habitat scale wildlife features like bat bricks, swift nest box bricks and house sparrow terraced nest box bricks incorporated into external facing brickwork of new buildings, sustainable urban drainage (SDS) wetland habitat creation measures, creation of new wildlife corridors, etc.	No	No	No	The new local plan will set higher requirements for biodiversity enhancements than the current Local Plan, reflecting the requirements of the Environment Act 2021 and greater focus on climate change mitigation.
Watt, J	RES24-246-12	12.13	Cannock Chase already very busy with some people not respecting the countryside. Litter frequently discarded and dogs' mess not cleaned up. More people can only mean more mess.  Site 036c – land south of Stafford, should remain as agricultural land.	No	No	No	Comments noted.  No changes proposed.
<b>POLICY NB1: PROTECTING, ENHANCING AND EXPANDING NATURAL ASSETS</b>							
Woodland Trust	STA24-054-01	Policy NB1	Woodland creation and conservation should be a major priority in the Local Plan with the maximum possible proportion of new trees native. Irreplaceable habitats, including ancient and veteran trees must be protected from loss or damage. The LP should give strong weight to Local Nature Recovery Strategies and these should inform priority locations for GI, BNG and habitat creation. Veteran trees should be recorded on the Ancient Tree Inventory.	Not stated	Not stated	Not stated	Comments noted.  Policy NB1 recognises and affords strong levels of protection to ancient woodland and ancient and veteran trees.  Policy NB2 (Biodiversity) identifies the role of Local Nature Recovery Strategies in supporting the delivery of improvements in biodiversity where this is to be delivered off-site.  No change proposed.
Avison Young for Crest Nicholson	AGT24-004-02-03	Policy NB1	The draft policy is inconsistent with national policy. For example, the proposed test for development proposals which directly or indirectly affect nationally designated sites, including SSSIs, where the policy is inconsistent with Paragraph 186 of the NPPF. The policy should be amended accordingly.	Yes	No	Not stated	Agreed amend wording of policy NB1 to more accurately reflect NPPF186.  Minor Modification 032: to paragraph regarding Nationally Designated Sites insert 'significant' to read 'cause significant harm'.
RCA Regeneration for Barberrry Developments	AGT24-035-01-02	Policy NB1	We agree with the plan's ambition to protect, enhance and maintain the natural environment, recognised within Policy NB1.	No	No	No	Support noted.  No change proposed.
RCA Regeneration for Seven Capital	AGT24-035-03-02	Policy NB1	We agree with the plan's ambition to protect, enhance and maintain the natural environment, recognised within Policy NB1.	Not stated	No	No	Support noted.  No change proposed.
Savills UK Ltd for	AGT24-	Policy	Our client objects to NB1. There is no national requirement to	Not stated	No	Not stated	The status of the habitat on a site may only

**CHAPTER 12 & POLICIES NB1-NB4: PROTECTING AND ENHANCING THE NATURAL ENVIRONMENT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
Taylor Wimpey	037-05-07	NB1	afford all sites which meet the criteria for designation, with the same protection as if it were designated. We therefore consider that the policy should seek to protect only local designated sites.				become apparent once a survey has been undertaken as part of the planning application process and therefore this element of the policy will enable a precautionary approach to be taken to ensure that potentially valued habitats will be protected and suitable protection/mitigation applied as appropriate.  No change proposed.
Pegasus Group for Richborough Estates	AGT24-030-05-02	Policy NB1	<p>Whilst important that consideration is given to the potential requirement for a species mitigation licence, this should be identified within the supporting policy text or the Natural Environment and Biodiversity SPD for information purposes only rather than under the provisions of planning policy. The requirement should therefore be deleted from Policy NB1.</p> <p>In referring to the best and most versatile agricultural land the policy sets out that it will be protected and enhanced. The NPPF (at paragraph 180) however recognises the economic and other benefits of agricultural land which should be considered in the overall planning balance alongside the provision of much needed homes to meet the District and the wider GBBCHMA. The policy as currently drafted should be amended to accurately reflect the provisions of national policy.</p>	Yes	No	Yes	<p>Placing in policy the need to consider the potential requirement for a species mitigation license ensures that this matter is addressed upfront. It is incumbent on the applicant to demonstrate that the three tests would be met, and for the Local Planning Authority to assess this information as part of a planning application in accordance with the Woolley and Morge cases.</p> <p>The policy is seeking to reflect NPPF180 paragraph a) which promotes the protection and enhancement of soils. The reference to best and most versatile in this context refers to the qualification within NPPF that such protection should be commensurate with their statutory status or identified quality. Therefore, the protection in policy NB1 is focussed on valued soils which are commonly referenced as the best and most versatile. This meets the requirement set out in NPPF. The economic benefits of the best and most versatile agricultural land could be interpreted as relating to their evident value to the economy for their use an agricultural resource.</p>
Savills UK Ltd for Barratt Homes	AGT24-037-01-03	Policy NB1	Our client objects to NB1. There is no national requirement to afford all sites which meet the criteria for designation, with the same protection as if it were designated. We therefore consider that the policy should seek to protect only local designated sites.	Not stated	No	Not stated	The status of the habitat on a site may only become apparent once a survey has been undertaken as part of the planning application process and therefore this element of the policy will enable a precautionary approach to be taken to ensure that potentially valued habitats will be protected and suitable protection/mitigation applied as appropriate.  No change proposed.
Pegasus Group for Richborough Estates	AGT24-030-05-02	Policy NB1	Whilst important that consideration is given to the potential requirement for a species mitigation licence, this should be identified within the supporting text or the Natural Environment and Biodiversity SPD for information purposes only. The requirement should be deleted from NB1. The provisions are reliant upon Natural England responding in relation to an initial	Yes	No	Yes	Placing in policy the need to consider the potential requirement for a species mitigation license ensures that this matter is addressed upfront. It is incumbent on the applicant to demonstrate that the three tests would be met, and for the Local Planning Authority to assess this information as

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			licence application which is considered onerous and unnecessary given NE are not required to grant at this stage. To require this input 'upfront' has the potential to unnecessarily slow the submission of applications.				part of a planning application in accordance with the Woolley and Morge cases.  No change proposed.
Pegasus Group for Richborough Estates	AGT24-030-05-02	Policy NB1	The NPPF recognises the economic and other benefits of agricultural land which should be considered in the overall planning balance alongside the provision of much needed homes. The policy should be amended to accurately reflect the provisions of national policy. The policy is unsound as it is neither justified not consistent with national policy.	Yes	No	Yes	The policy is responding to the commitment in NPPF180 that planning policy should protect and enhance the soil resource.  No change proposed.
Pegasus Group for Clowes Developments	AGT24-030-02-02	Policy NB1	Whilst important that consideration is given to the potential requirement for a species mitigation licence, this should be identified within the supporting text or the Natural Environment and Biodiversity SPD for information purposes only. The requirement should be deleted from NB1. The provisions are reliant upon Natural England responding in relation to an initial licence application which is considered onerous and unnecessary given NE are not required to grant at this stage. To require this input 'upfront' has the potential to unnecessarily slow the submission of applications.	Not stated	No	No	Placing in policy the need to consider the potential requirement for a species mitigation license ensures that this matter is addressed upfront. It is incumbent on the applicant to demonstrate that the three tests would be met, and for the Local Planning Authority to assess this information as part of a planning application in accordance with the Woolley and Morge cases.  No change proposed.
Pegasus Group for Clowes Developments	AGT24-030-02-02	Policy NB1	The NPPF recognises the economic and other benefits of agricultural land which should be considered in the overall planning balance alongside the provision of much needed homes. The policy should be amended to accurately reflect the provisions of national policy. The policy is unsound as it is neither justified not consistent with national policy.	Not stated	No	No	The policy is responding to the commitment in NPPF180 that planning policy should protect and enhance the soil resource.  No change proposed.
Pegasus Group for Persimmon Homes	AGT24-030-04-01	Policy NB1	Whilst important that consideration is given to the potential requirement for a species mitigation licence, this should be identified within the supporting text or the Natural Environment and Biodiversity SPD for information purposes only. The requirement should be deleted from NB1. The provisions are reliant upon Natural England responding in relation to an initial licence application which is considered onerous and unnecessary given NE are not required to grant at this stage. To require this input 'upfront' has the potential to unnecessarily slow the submission of applications.	Not stated	No	Not stated	Placing in policy the need to consider the potential requirement for a species mitigation license ensures that this matter is addressed upfront. It is incumbent on the applicant to demonstrate that the three tests would be met, and for the Local Planning Authority to assess this information as part of a planning application in accordance with the Woolley and Morge cases.  No change proposed.
Pegasus Group for Persimmon Homes	AGT24-030-04-01	Policy NB1	In referring to best and most versatile agricultural land, the policy sets out that it will be protected and enhanced. The NPPF recognises the economic benefits for agricultural land which should be considered in the over planning balance alongside the provision of homes. The policy should be amended to accurately reflect national policy. The policy is unsound as it is neither justified not consistent with national policy.	Not stated	No	Not stated	The policy is responding to the commitment in NPPF180 that planning policy should protect and enhance the soil resource.  No change proposed.
Pegasus Group for Taylor Wimpey	AGT24-030-08-02	Policy NB1	Whilst important that consideration is given to the potential requirement for a species mitigation licence, this should be identified within the supporting text or the Natural Environment and Biodiversity SPD for information purposes only. The	Not stated	No	Not stated	Placing in policy the need to consider the potential requirement for a species mitigation license ensures that this matter is addressed upfront. It is incumbent on the applicant to demonstrate that

**CHAPTER 12 & POLICIES NB1-NB4: PROTECTING AND ENHANCING THE NATURAL ENVIRONMENT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			requirement should be deleted from NB1. The provisions are reliant upon Natural England responding in relation to an initial licence application which is considered onerous and unnecessary given NE are not required to grant at this stage. To require this input 'upfront' has the potential to unnecessarily slow the submission of applications. The policy is unsound as it is neither justified not consistent with national policy.				the three tests would be met, and for the Local Planning Authority to assess this information as part of a planning application in accordance with the Woolley and Morge cases.  No change proposed.
Swifts Local Network: Swifts & Planning Group	STA24-046-01	Policy NB1	Support this policy	Not stated	Not stated	Not stated	Support noted.  No change proposed.
Marsh, J	RES24-140-10	Policy NB1	Poolhouse fields are green spaces. They are green belt removed by South Staffs council by performing a deliberately low-ley consultation in 2018. The plans are literally to bulldoze and tarmac these fields, cut down all the trees and destroy the natural drainage that the fields provide. Queries how this policy can be on the website on the same section as these plans.	Not stated	Not stated	Not stated	Policy NB1 is seeking to protect sites which are identified as being of national and local significance owing to habitat quality and the species that are supported. As part of the process of selecting sites for development the district council takes account of the natural environment resources on each site and seeks to protect those assets which are considered irreplaceable and to also promote net gains in biodiversity as a positive outcome from permitting development.  No change proposed.
<b>POLICY NB2: BIODIVERSITY</b>							
Kinver Parish Council	STA24-025-10	Policy NB2	It is disappointing that BNG has not been set beyond the minimum, for example to 20%	Not stated	Not stated	Not stated	The figure within the policy aligns with national policy of seeking to achieve a minimum 10% net gain. Biodiversity enhancements are just one consideration alongside other planning gain requirements which need to be considered and factored into site viability assessment.  No change proposed.
Woodland Trust	STA24-054-01	Policy NB2	The plan should require 20% BNG with BNG units maintained for a minimum of 50 years,	Not stated	Not stated	Not stated	The figure within the policy aligns with national policy of seeking to achieve a minimum 10% net gain. Biodiversity enhancements are just one consideration alongside other planning gain requirements which need to be considered and factored into site viability assessment.  No change proposed.
First City for St Mary's Presbytery and The Archdiocese of Birmingham	AGT24-018-01-13	Policy NB2	The need to address net losses to Biodiversity through the provision of enhancement to deliver and overall net gain is supported. The Council's policy requirement to deliver Biodiversity Net Gain, reflects that of the Environment Act and national policy so we do not object.  We do not consider the local plan should duplicate policy set out in the NPPF or in Legislation and should not require an increase	Not stated	Not stated	Not stated	It is considered that policy NB2 contributes towards meeting the NPPF requirement that planning policy provide net gains for biodiversity. In addition to restating the commitment to the 10% BNG requirement the plan policy identifies a clear sequence in the approach to delivering BNG with a preference for on-site delivery but also identifying alternative measures for delivery where



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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>in Biodiversity net gain over and above that set nationally.</p> <p>We again consider it is important for all policies to be considered in unison so that there is not repetition or duplication of provisions being requested.</p>				<p>this is not achievable.</p> <p>No change proposed.</p>
Avison Young for Crest Nicholson	AGT24-004-02-03	Policy NB2	The reference to "all development must provide a minimum of 10% biodiversity net gain" is unnecessary, given that this now set out in the Environment Act Legislation and accompanying national guidance. The draft wording of Policy NB2 includes inconsistencies with the statutory framework, for example, the reference to habitats being secured in perpetuity. This is inconsistent with the statutory framework and should be deleted.	Yes	No	Not stated	<p>It is considered that policy NB2 contributes towards meeting the NPPF requirement that planning policy provide net gains for biodiversity. In addition to restating the commitment to the 10% BNG requirement the plan policy identifies a clear sequence in the approach to delivering BNG with a preference for on-site delivery but also identifying alternative measures for delivery where this is not achievable.</p> <p style="background-color: #90EE90;">Agree with respect to the requirement for habitats to be secured in perpetuity</p> <p style="background-color: #90EE90;">Minor modification 036: remove 'in perpetuity'</p>
Pegasus Group for BDW Trading Ltd	AGT24-030-01-11	Policy NB2	The policy should be reworded so that this is clear which developments are exempt from the requirements, in line with The Biodiversity Gain Requirements (Exemptions) Regulations 2024. The policy also says that proposals must demonstrate the measurement of biodiversity net gain through the submission of the biodiversity metric. However, the post-development habitat value need only be demonstrated through the biodiversity metric after approval. The policy should be reworded so it is clear what information needs to be submitted and when, in line with the requirement of the Environment Act 2021 as inserted into the Town and Country Planning Act 1990.	Not stated	No	Not stated	<p>Adding list of exempt developments and process requirements into policy considered to be unnecessary duplication with national legislation and policy.</p> <p>No change proposed.</p>
RCA Regeneration for Barberry Developments	AGT24-035-01-02	Policy NB2	We agree with the plan's ambition to protect, enhance and maintain the natural environment, recognised within Policies NB1 and NB2. The mandatory requirements of biodiversity net gain means all development sites should make a positive contribution to biodiversity of at least 10%. Housing development should therefore be recognised within the plan as a key contributor to improving the natural environment. There is no such obligation placed on agricultural operations.	No	No	No	<p>Comments noted.</p> <p>No change proposed.</p>
RCA Regeneration for Seven Capital	AGT24-035-03-02	Policy NB2	We agree with the plan's ambition to protect, enhance and maintain the natural environment, recognised within Policies NB1 and NB2. The mandatory requirements of biodiversity net gain means all development sites should make a positive contribution to biodiversity of at least 10%. Housing development should therefore be recognised within the plan as a key contributor to improving the natural environment. There is no such obligation placed on agricultural operations.	Not stated	No	No	<p>Comments noted.</p> <p>No change proposed.</p>

**CHAPTER 12 & POLICIES NB1-NB4: PROTECTING AND ENHANCING THE NATURAL ENVIRONMENT**

<b>Respondent</b>	<b>Opus Ref</b>	<b>Para No.</b>	<b>Summary of Issue Raised</b>	<b>Legally compliant</b>	<b>Sound</b>	<b>Compliant with Duty to Cooperate</b>	<b>Proposed Action/Response</b>
Evolve Planning & Design for Lovell Homes	AGT24-017-05-01	Policy NB2	The intention of NB2 is recognised, and any policy should require a net gain in line with latest Government legislation, policy or guidance.	Not stated	Not stated	Not stated	Comments noted. No change proposed.
Evolve Planning & Design for Keon Homes	AGT24-017-04-01	Policy NB2	The intention of NB2 is recognised, and any policy should require a net gain in line with latest Government legislation, policy or guidance.	Not stated	Not stated	Not stated	Comments noted. No change proposed.
Evolve Planning & Design for Four Ashes Road Ltd	AGT24-017-03-01	Policy NB2	The intention of NB2 is recognised, and any policy should require a net gain in line with latest Government legislation, policy or guidance.	Not stated	Not stated	Not stated	Comments noted. No change proposed.
Evolve Planning & Design for Cameron Homes	AGT24-017-02-01	Policy NB2	The intention of NB2 is recognised, however the Government policy and guidance already requires a 10% biodiversity net gain. Any policy should require a net gain in line with latest Government legislation, policy or guidance.	Not stated	Not stated	Not stated	Comments noted. No change proposed.
Savills UK Ltd for Taylor Wimpey	AGT24-037-05-08	Policy NB2	NB2 states that "consideration must be given to the aims and objectives of the Local Nature Recovery Strategy". The LNRS is currently being developed by Staffordshire County Council and Stoke-on-Trent City Council. Therefore, the document has not yet been published and no public consultation has been undertaken on the document. NB2 has not been informed by up to date information and shaped by evidence and is therefore not justified or consistent with national policy.	Not stated	No	Not stated	The Local Nature Reserve Strategy is a statutory requirement, and it is anticipated that the Local Nature Reserve Strategy (LNRS) will be adopted during the operational period of the local plan. It is considered to be appropriate to reference the LNRS as it is anticipated that the strategy will have a key role to play influencing the selection of sites to accommodate off-site biodiversity gains.  The clear preference is that Biodiversity Net Gain will be delivered on-site or failing that as a second preference on biodiversity units in close proximity to the site. Should the LNRS not have been adopted when such matters are being considered the policy is clear that contribution through statutory biodiversity credits will be acceptable.  No change proposed.
Turley Associates for Bellway Homes	AGT24-041-01-02	Policy NB2	Bellway are supportive of the policy requirement to provide "measures to assist with halting the decline of species and to address biodiversity loss" however this should be proportionate and reflected as such in the policy. We suggest including the wording "proportionate measures". The list of potential enhancements should be presented as examples and not act as an exclusive and closed list.	No	No	No	Reference to proportionate is not considered necessary for the implementation of the policy or how it would be assessed.  The policy list of potential enhancement measures is identified as a list of potential examples rather than as a closed list.
Savills UK Ltd for Barratt Homes	AGT24-037-01-04	Policy NB2	NB2 states that "consideration must be given to the aims and objectives of the Local Nature Recovery Strategy". The LNRS is currently being developed by Staffordshire County Council and Stoke-on-Trent City Council. Therefore, the document has not yet been published and no public consultation has been undertaken on the document. NB2 has not been informed by up to date information and shaped by evidence and is therefore not justified or consistent with national policy.	Not stated	No	Not stated	The Local Nature Reserve Strategy is a known statutory requirement, and it is anticipated that the Local Nature Reserve Strategy (LNRS) will be adopted during the operational period of the local plan. Omitting reference within policy to the strategy would result in the potential failure during the plan period to promote locally identified sites of strategic significance which could benefit from developer funded biodiversity enhancements.

**CHAPTER 12 & POLICIES NB1-NB4: PROTECTING AND ENHANCING THE NATURAL ENVIRONMENT**

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							The clear preference is that Biodiversity Net Gain will be delivered on-site or failing that as a second preference on biodiversity units in close proximity to the site. Should the LNRS not have been adopted when such matters are being considered the policy is clear that contribution through statutory biodiversity credits will be acceptable.  No change proposed.
Evolve Planning & Design for Bloor Homes	AGT24-017-01-09	Policy NB2	Land East of Bilbrook - The intention of NB2 is recognised, however the Government policy and guidance already requires a 10% biodiversity net gain. Any policy should require a net gain in line with latest Government legislation, policy or guidance.	Not stated	Not stated	Not stated	Policy NB2 sets out a requirement for a minimum 10% Biodiversity Net Gain which is aligned with the requirements in Government legislation.  No change proposed.
First City Ltd for UKPI Ltd	AGT24-018-02-11	Policy NB2	The need to address net losses to Biodiversity through the provision of enhancement to deliver and overall net gain is supported. The Council's policy requirement to deliver Biodiversity Net Gain, reflects that of the Environment Act and national policy, so we do not object. We do not consider the local plan should duplicate policy set out in the NPPF or in Legislation and should not require an increase in Biodiversity net gain over and above that set nationally. We again consider it is important for all policies to be considered in unison so that there is not repetition or duplication of provisions being requested.	Not stated	Not stated	Not stated	It is considered that policy NB2 contributes towards meeting the NPPF requirement that planning policy provide net gains for biodiversity. In addition to restating the commitment to the 10% BNG requirement the plan policy identifies a clear sequence in the approach to delivering BNG with a preference for on-site delivery but also identifying alternative measures for delivery where this is not achievable.  No change proposed.
Lloyd, K	RES24-136-17	Policy NB2	BNG of 10% is the legal minimum. A LPA has the ability to increase this amount and I feel that the council should do so . 10% lacks ambition and shows developers that it is only applying the bare minimum in order to comply with the law. Make BNG 20% minimum, it sends a message to developers that South Staffs Council cares about the wildlife. If the council is serious about responding to these declines in wildlife species, all of which are above 10%, then a figure above that mark is essential or else we will just be treading water. We must improve biodiversity, not maintain it at its current state.	Yes	No	Yes	The figure within the policy aligns with national policy of seeking to achieve a minimum 10% net gain. Biodiversity enhancements are just one consideration alongside other planning gain requirements which need to be considered and factored into site viability assessment.  No change proposed.
Pegasus Group for Richborough Estates	AGT24-030-05-02	Policy NB2	Richborough are supportive of the need to address net losses to biodiversity. Given the 10% BNG is a mandatory requirement for all developments, the detailed provisions in NB2 are considered unnecessary and a duplication of national policy requirements. The policy should be simplified with clauses A-C deleted so as to avoid potential misinterpretation within the wording.	Yes	No	Yes	The provisions within policy NB2 relating to BNG provides a framework to support decision making with respect to the sequence of preferred locations for BNG and support the role of Local Nature Recovery Strategy in providing a strategic approach to biodiversity and nature recovery.  No change proposed.
Pegasus Group for Miller Homes	AGT24-030-03-15	Policy NB2	This policy should be reworded so that it is clear which developments are exempt from the requirements. The post-development habitat value only needs to be demonstrated	Not stated	No	No	Adding list of exempt developments and process requirements into policy considered to be unnecessary duplication with national legislation

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			through the biodiversity metric after approval, the policy should be reworded so it is clear what information needs to be submitted and when.				and policy.  No change proposed.
Pegasus Group for Clowes Developments	AGT24-030-02-02	Policy NB2	Clowes are supportive of the need to address net losses to biodiversity. Given the 10% BNG is a mandatory requirement for all developments, the detailed provisions in NB2 are considered unnecessary and a duplication of national policy requirements. The policy should be simplified with clauses A-C deleted so as to avoid potential misinterpretation within the wording.	Not stated	No	No	The provisions within policy NB2 relating to BNG provides a framework to support decision making with respect to the sequence of preferred locations for BNG and supports the role of Local Nature Recovery Strategy in providing a strategic approach to biodiversity and nature recovery.  No change proposed.
Pegasus Group for Persimmon Homes	AGT24-030-04-01	Policy NB2	Persimmon Homes are supportive of the need to address net losses to biodiversity. Given the 10% BNG is a mandatory requirement for all developments, the detailed provisions in NB2 are considered unnecessary and a duplication of national policy requirements. The policy should be simplified with clauses A-C deleted so as to avoid potential misinterpretation within the wording. The Natural Environment and Biodiversity SPD should expand upon the requirements but not seek any additional policy provisions. <sup>7</sup>	Not stated	No	Not stated	The provisions within policy NB2 relating to BNG provides a framework to support decision making with respect to the sequence of preferred locations for BNG and supports the role of Local Nature Recovery Strategy in providing a strategic approach to biodiversity and nature recovery.  No change proposed.
Pegasus Group for Taylor Wimpey	AGT24-030-08-02	Policy NB2	Taylor Wimpey are supportive of the need to address net losses to biodiversity. Given the 10% BNG is a mandatory requirement for all developments, the detailed provisions in NB2 are considered unnecessary and a duplication of national policy requirements. The policy should be simplified with clauses A-C deleted so as to avoid potential misinterpretation within the wording.	Not stated	No	Not stated	The provisions within policy NB2 relating to BNG provides a framework to support decision making with respect to the sequence of preferred locations for BNG and supports the role of Local Nature Recovery Strategy in providing a strategic approach to biodiversity and nature recovery.  No change proposed.
RSPB	STA24-037-01	Policy NB2	Provision should be made for universal nest bricks for birds explicit through a development condition in Policy NB2.  Suggest that a Supplementary Planning Document is produced to complement this Policy, which should provide detailed guidance on how to incorporate nesting opportunities for Swifts and other Red-Listed bird species within development proposals.  Also suggest a separate policy provision for roosting bats within NB2.	Not stated	Not stated	Not stated	<b>Principle of including reference to more permanent structures accepted.</b>  <b>Proposed minor modification 035: amend policy to include 'bat and bird boxes must be integrated into the fabric of buildings wherever possible to ensure the longevity of the enhancements'</b>
Shropshire Swift Group	STA24-040-01	Policy NB2	It is good to see the reference to bird boxes but not all birds nest in trees. Swift bricks are a universal nest brick for small cavity dwelling birds and are used by several urban species eg sparrows, tits and even house martins as well as swifts. Swifts have struggled in recent decades to find enough nest sites as buildings that had	Not stated	Not stated	Not stated	<b>Principle of including reference to more permanent structures accepted.</b>  <b>Proposed minor modification 035: amend policy to include 'bat and bird boxes must be integrated into the fabric of buildings wherever possible'</b>

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**CHAPTER 12 & POLICIES NB1-NB4: PROTECTING AND ENHANCING THE NATURAL ENVIRONMENT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			suitable nooks and crannies have been renovated or demolished. Swift bricks are a permanent solution - they require no maintenance - and are a better option to boxes. BS42021 details best practice guidance.				<b>to ensure the longevity of the enhancements'</b>
Davison, J	RES24-053-03	Policy NB2	support the reference to 'bird boxes' but it should be replaced by or supplemented by a requirement of one swift brick per dwelling. For commercial developments one swift brick per 5 car park space	Not stated	Not stated	Not stated	<b>Principle of including reference to more permanent structures accepted.</b>  <b>Proposed minor modification 035: amend policy to include 'bat and bird boxes must be integrated into the fabric of buildings wherever possible to ensure the longevity of the enhancements'</b>
Marsh, J	RES24-140-11	Policy NB2	Queries how developing three green fields supposed to support an enhance biodiversity. Queries why a single brownfield site can't be identified.	Not stated	Not stated	Not stated	Policy NB2 is seeking to promote and enhance biodiversity. As part of the process of selecting sites for development the district council takes account of the natural environment resources on each site and seeks to protect those assets which are considered irreplaceable and to also promote net gains in biodiversity as a positive outcome from permitting development.  No change proposed.
The Planning Bureau for McCarthy Stone	AGT24-033-01-06	Policy NB2	Note that policy NB2 Biodiversity seeks to secure the habitat gain into perpetuity rather than for the statutory 30 years. The Council should reconsider the additional wording it proposes with regard to BNG to ensure the policy is in line with the guidance and statutory instruments that the government have recently updated / published regarding statutory Biodiversity Net Gain.	No	No	No	<b>Agree with respect to the requirement for habitats to be secured in perpetuity</b>  <b>Minor modification 036: remove 'in perpetuity'</b>
Swifts Local Network: Swifts and Planning Group	STA24-046-02	Policy NB2	Add to Policy NB2: Swift bricks are a universal nest brick for small bird species, and should be installed in all new-build developments including extensions, in accordance with best-practice guidance such as BS 42021 or CIEEM. Swift bricks are significantly more beneficial than external bird boxes as they are a permanent feature of the building, have zero maintenance requirements, are aesthetically integrated with the design of the building, and have improved thermal regulation with future climate change in mind.	Not stated	Not stated	Not stated	<b>Principle of including reference to more permanent structures accepted.</b>  <b>Proposed minor modification 035: amend policy to include 'bat and bird boxes must be integrated into the fabric of buildings wherever possible to ensure the longevity of the enhancements'</b>
JMS Planning for Wolverhampton Halfpenny Green Airport	AGT24-023-01-01	Policy NB2	JMS Planning supports the provision of biodiversity net gain on development sites, however, to ensure compliance with legislation and to ensure soundness of the Local Plan, the LPA must include in Policy NB2 (Biodiversity) reference to the exemptions set out in Statute.	No	No	Not stated	Adding list of exempt developments and process requirements into policy considered to be unnecessary duplication with national legislation and policy.  No change proposed
<b>POLICY NB3: CANNOCK CHASE SAC</b>							
Lichfield District	STA24-	Policy	LDC supports the approach taken by SSDC in policy NB3 to	Yes	Yes	Yes	Support noted.



**CHAPTER 12 & POLICIES NB1-NB4: PROTECTING AND ENHANCING THE NATURAL ENVIRONMENT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
Council	027-01	NB3	ensure the integrity of the Cannock Chase SAC				No change proposed.
Natural England	STA24-033-01	Policy NB3	In terms of Cannock Chase Special Area of Conservation and recreational impacts, the Local Plan does comply with the Duty to Co-operate.	No	No	Yes	Comment noted. No change proposed.
Evolve Planning & Design for Cameron Homes	AGT24-017-02-01	Policy NB3	Cameron Homes notes further evidence in respect of Cannock Chase SAC, including a review of mitigation measures and visitor survey. It recognises that the site is within a 15km Zone of Influence of Cannock Chase SAC.	Not stated	Not stated	Not stated	Comment noted. No change proposed.
Evolve Planning & Design for Keon Homes	AGT24-017-04-01	Policy NB3	Keon Homes notes further evidence in respect of Cannock Chase SAC, including a review of mitigation measures and visitor survey. It recognises that the site is within a 15km Zone of Influence of Cannock Chase SAC.	Not stated	Not stated	Not stated	Comment noted. No change proposed.
<b>POLICY NB4: LANDSCAPE CHARACTER</b>							
Staffordshire County Council	STA24-044-14	Policy NB4	<p>Policy NB4 states 'Proposals must consider the County Council Landscape Character Assessment'. This should be shown as Planning for Landscape Change or any subsequent revised version.</p> <p>It continues, 'and Historic Landscape Characterisation in assessing their impacts upon landscape character'. The HLC is available as separate data.</p> <p>It 'should also (where applicable) have regard to the findings of the latest Landscape Sensitivity Study prepared by the council.'</p> <p>It is not clearly stated if this study is by Staffordshire County Council (SCC) or South Staffordshire District Council?</p> <p>Key evidence shown is 'Planning for Landscape Change – SCC'. This remains the official guidance available but is not shown in the Local Plan review evidence base.</p> <p>It is understood that South Staffordshire District Council have their own Landscape Assessment which may be more recent than the SCC Landscape Character Assessment.</p> <p>Proposed wording: Proposals must consider 'Planning for Landscape Change', the Staffordshire County Council Landscape Character Assessment (or any subsequent updates), and Historic Landscape Characterisation, in assessing their impacts upon landscape character.</p> <p>Proposals should (where applicable) have regard to the findings of the latest Landscape Sensitivity Study; South Staffordshire Landscape Sensitivity Assessment 2019, or any subsequent updates.</p>	Yes	No	Yes	<p><b>Minor modification 041:</b></p> <p><del>Proposals must consider the County Council Landscape Character Assessment and Historic Landscape Characterisation in assessing their impacts upon landscape character and should also (where applicable) have regard to the findings of the latest Landscape Sensitivity Study prepared by the council.</del></p> <p><b>Proposals must consider 'Planning for Landscape Change', the Staffordshire County Council Landscape Character Assessment (or any subsequent updates), and Historic Landscape Characterisation, in assessing their impacts upon landscape character. Proposals should (where applicable) have regard to the findings of the latest Landscape Sensitivity Study; South Staffordshire Landscape Sensitivity Assessment 2019, or any subsequent updates.</b></p>
Savills UK Ltd for St Modwen & JM Holt	AGT24-037-04-12	Policy NB4	We object to the policy NB4, because it is not in accordance with national policy, justified or effective. This policy proposes to strengthen the protection of trees and hedgerows. The NPPF protects ancient woodland and ancient and veteran trees (paragraph 186c), there is no national requirement to protect all trees.	Yes	No	No	Whilst promoting the protection and retention of trees, woodland and hedgerows the policy does provide scope for removal where this is clearly demonstrated and where adequate mitigation is provided.

**CHAPTER 12 & POLICIES NB1-NB4: PROTECTING AND ENHANCING THE NATURAL ENVIRONMENT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			In order for Policy NB4 to be consistent with national policy (paragraph 35d), it should be amended to remove protection of trees which are not defined as 'irreplaceable habitats' (NPPF Annex 2)				Trees, woodlands and hedgerows provide multiple benefits which are identified within the NPPF and which it is considered justify local plan policy support and protection. Trees, woodland and hedgerows are valuable biodiversity habitats, positively contribute to landscape character, act as wildlife corridors and stepping stones supporting and connecting ecological networks, enhancing the character of urban environments and helping to mitigate and adapt to climate change.  No change proposed.
First City for St Mary's Presbytery and The Archdiocese of Birmingham	AGT24-018-01-14	Policy NB4	Policy NB4, states, "All trees, woodland, and hedgerows should be protected and retained"  Whilst it is appreciated that the policy identifies that should a loss be required, appropriate mitigation measures must be delivered by the developer.  We consider the above quote could be misinterpreted and hinder proposed developments where trees needed to be removed, despite the inclusion of additional planting as part of a proposed landscaping scheme and in accordance with policy NB2, the requirement for biodiversity net gain.  The policy wording should be amended to the following: "All trees, woodland and hedgerows should be protected and retained wherever possible."	Not stated	Not stated	Not stated	Whilst promoting the protection and retention of trees, woodland and hedgerows the policy does provide scope for removal where this is clearly demonstrated and where adequate mitigation is provided.  No change proposed.
Avison Young for Crest Nicholson	AGT24-004-02-03	Policy NB4	The wording of this policy is inconsistent with that contained in NPPF which specifically talks about "protecting and enhancing valued landscapes". It does not talk about maintaining and enhancing landscapes in general. The reference to 'protecting and retaining' "all trees, woodland and hedgerows" is also unjustified and inconsistent with national policy and guidance. The wording of this policy should be amended or the relevant sections deleted to ensure consistency with national policy.	Yes	No	Not stated	Whilst promoting the protection and retention of trees, woodland and hedgerows, the policy does provide scope for removal where this is clearly demonstrated and where adequate mitigation is provided.  Trees, woodlands and hedgerows provide multiple benefits which are identified within the NPPF and which it is considered justify local plan policy support and protection. Trees, woodland and hedgerows are valuable biodiversity habitats, positively contribute to landscape character, act as wildlife corridors and stepping stones supporting and connecting ecological networks, enhancing the character of urban environments and helping to mitigate and adapt to climate change.  <b>Proposed minor modification 039:</b> The intrinsic rural character and local distinctiveness of the South Staffordshire landscape should be maintained <b>protected and</b>

**CHAPTER 12 & POLICIES NB1-NB4: PROTECTING AND ENHANCING THE NATURAL ENVIRONMENT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							where possible enhanced.
Historic England	STA24-023-01	Policy NB4	Change AONB's to National Landscape.	Not stated	Not stated	Not stated	<p><b>Minor modification 042:</b></p> <p>All proposals within the Cannock Chase Area of Outstanding Natural Beauty (AONB) <b>National Landscape</b> and its setting must conserve and enhance the landscape and scenic beauty of the area. In assessing proposals within the AONB <b>National Landscape</b> or its setting regard must be had to the Cannock Chase AONB Design Guide 2020 and Cannock Chase AONB Views and Setting Guide 2020, or subsequent updates of these documents. Proposals that contribute to the objectives of the Cannock Chase AONB Management Plan, the Forest of Mercia and other local initiatives that will contribute to enhancing landscape character will be supported</p>
Emery Planning for Wain Estates	AGT24-016-02-01	Policy NB4	<p>The policy could be interpreted in a way that is unnecessarily restrictive, as the development of any greenfield site will inevitably result in some level of adverse visual effects on the immediate environment or in longer range views. National policy does not advocate a no development / zero harm approach to landscape character; rather, development should be sympathetic to landscape character and seek to minimise and mitigate against significant impacts.</p> <p>The policy also continues to state that all trees, woodland, and hedgerows should be protected and retained. The policy should express their retention as a preference rather than a strict policy requirement. The Framework does not advocate an approach that all trees, woodland and hedgerows must be retained. The policy is not considered to satisfy paragraph 35 d) of the Framework as it does not reflect paragraphs 135(c) and 180(a) of the Framework.</p>	Not stated	No	No	<p>Whilst promoting the protection and retention of trees, woodland and hedgerows the policy does provide scope for removal where this is clearly demonstrated and where adequate mitigation is provided.</p> <p>Trees, woodlands and hedgerows provide multiple benefits which are identified within the NPPF and which it is considered justify local plan policy support and protection. Trees, woodland and hedgerows are valuable biodiversity habitats, positively contribute to landscape character, act as wildlife corridors and stepping stones supporting and connecting ecological networks, enhancing the character of urban environments and helping to mitigate and adapt to climate change.</p> <p><b>Minor modification 040:</b></p> <p>and seek to <del>not</del> have <b>minimise the a-detrimental effect on the immediate environment</b></p>
RCA Regeneration for Barberrry Developments	AGT24-035-01-02	Policy NB4	We agree with Policy NB4 with regards to landscape character, that distinct landscape features such as trees, woodland, and hedgerows must be protected and maintained	No	No	No	<p>Support noted.</p> <p>No change proposed.</p>
RCA Regeneration for Seven Capital	AGT24-035-03-02	Policy NB4	We agree with Policy NB4 with regards to landscape character, that distinct landscape features such as trees, woodland, and hedgerows must be protected and maintained	Not stated	No	No	<p>Support noted.</p> <p>No change proposed.</p>
RCA Regeneration	AGT24-	Policy	We agree with Policy NB4 with regards to landscape character,	Not stated	No	No	Support noted.

**CHAPTER 12 & POLICIES NB1-NB4: PROTECTING AND ENHANCING THE NATURAL ENVIRONMENT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
for Richborough Estates	035-02-02	Nb4	that distinct landscape features such as trees, woodland, and hedgerows must be protected and maintained				No change proposed.
Savills UK Ltd for Clowes Developments	AGT24-037-02-08	Policy NB4	Clowes objects to NB4 because it is not in accordance with national policy, justified or effective. There is no requirement in the NPPF to protect all trees. We do not consider that Category C or U trees should be afforded any specific protection within the policy. In order for the policy to be consistent with national policy, it should be amended to remove protection of trees which are not defined as 'irreplaceable habitats'.	Yes	No	Yes	<p>Whilst promoting the protection and retention of trees, woodland and hedgerows the policy does provide scope for removal where this is clearly demonstrated and where adequate mitigation is provided.</p> <p>Trees, woodlands and hedgerows provide multiple benefits which are identified within the NPPF and which it is considered justify local plan policy support and protection. Trees, woodland and hedgerows are valuable biodiversity habitats, positively contribute to landscape character, act as wildlife corridors and stepping stones supporting and connecting ecological networks, enhancing the character of urban environments and helping to mitigate and adapt to climate change.</p> <p>No change proposed.</p>
Savills UK Ltd for Taylor Wimpey	AGT24-037-05-09	Policy NB4	NB4 proposes to amend the adopted Landscape Character policy to strengthen the protection of trees and hedgerows but does not differentiate between different categories of trees. The Council has not provided any evidence to justify why 'all' trees should be afforded the same protection. In order to be consistent with national policy NB4 should align with NPPF paragraph 186c and only seek to protect ancient and veteran trees unless there are wholly exceptional reasons to justify their removal.	Not stated	No	Not stated	<p>Whilst promoting the protection and retention of trees, woodland and hedgerows the policy does provide scope for removal where this is clearly demonstrated and where adequate mitigation is provided.</p> <p>Trees, woodlands and hedgerows provide multiple benefits which are identified within the NPPF and which it is considered justify local plan policy support and protection. Trees, woodland and hedgerows are valuable biodiversity habitats, positively contribute to landscape character, act as wildlife corridors and stepping stones supporting and connecting ecological networks, enhancing the character of urban environments and helping to mitigate and adapt to climate change.</p> <p>No change proposed.</p>
Savills UK Ltd for Barratt Homes	AGT24-037-01-05	Policy NB4	NB4 proposes to amend the adopted Landscape Character policy to strengthen the protection of trees and hedgerows but does not differentiate between different categories of trees. The Council has not provided any evidence to justify why 'all' trees should be afforded the same protection. In order to be consistent with national policy NB4 should align with NPPF paragraph 186c and only seek to protect ancient and veteran trees unless there are wholly exceptional reasons to justify their removal.	Not stated	No	Not stated	<p>Whilst promoting the protection and retention of trees, woodland and hedgerows the policy does provide scope for removal where this is clearly demonstrated and where adequate mitigation is provided.</p> <p>Trees, woodlands and hedgerows provide multiple benefits which are identified within the NPPF and which it is considered justify local plan policy support and protection. Trees, woodland and</p>

**CHAPTER 12 & POLICIES NB1-NB4: PROTECTING AND ENHANCING THE NATURAL ENVIRONMENT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							hedgerows are valuable biodiversity habitats, positively contribute to landscape character, act as wildlife corridors and stepping stones supporting and connecting ecological networks, enhancing the character of urban environments and helping to mitigate and adapt to climate change.  No change proposed.
First City Ltd for UKPI Ltd	AGT24-018-02-12	Policy NB4	Policy NB4, states, "All trees, woodland, and hedgerows should be protected and retained" Whilst it is appreciated that the policy identifies that should a loss be required, appropriate mitigation measure must be delivered by the developer. We consider the above quote could be misinterpreted and hinder proposed developments where trees are needed to be removed despite the inclusion of additional planting as part of a proposed landscaping scheme and in accordance with policy NB2 - the requirement for biodiversity net gain.	Not stated	Not stated	Not stated	Whilst promoting the protection and retention of trees, woodland and hedgerows the policy does provide scope for removal where this is clearly demonstrated and where adequate mitigation is provided.  Trees, woodlands and hedgerows provide multiple benefits which are identified within the NPPF and which it is considered justify local plan policy support and protection. Trees, woodland and hedgerows are valuable biodiversity habitats, positively contribute to landscape character, act as wildlife corridors and stepping stones supporting and connecting ecological networks, enhancing the character of urban environments and helping to mitigate and adapt to climate change.  No change proposed.
Lloyd, K	RES24-136-18	Policy NB4	Development of the Bilbrook site would contravene this policy, EC12 and NB2. The current plan is for there to be 4 vehicular entrances to the site which would require removal of extensive lengths of hedgerows. This would destroy important wildlife corridors and habitats, which couldn't be mitigated as it would be breaking the link provided by the hedge. Lane Green Rd hedge is almost certainly ancient and multiple entrances to the site is entirely avoidable.	Not stated	Not stated	Not stated	Comments noted. Policy requirements are that development which would result in the loss of trees, woodlands or hedgerows would need to be mitigated. Combined with the requirement to provide a Biodiversity Net Gain there will need to be an overall enhancement in biodiversity value resulting from the development of sites identified within the local plan.  No change proposed.
Pegasus Group for Richborough Estates	AGT24-030-05-02	Policy NB4	Amendment to the policy to read 'all trees, woodland and hedgerows should be protected and retained wherever possible'. Some loss of trees and hedgerows is likely to be inevitable as it is almost always necessary to remove hedgerows to accommodate vehicular access to the site.	Yes	No	Yes	Whilst promoting the protection and retention of trees, woodland and hedgerows the policy does provide scope for removal where this is clearly demonstrated and where adequate mitigation is provided.  Trees, woodlands and hedgerows provide multiple benefits which are identified within the NPPF and which it is considered justify local plan policy support and protection. Trees, woodland and hedgerows are valuable biodiversity habitats, positively contribute to landscape character, act as



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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							wildlife corridors and stepping stones supporting and connecting ecological networks, enhancing the character of urban environments and helping to mitigate and adapt to climate change.  No change proposed.
Pegasus Group for Clowes Developments	AGT24-030-02-02	Policy NB4	Amendment to the policy to read 'all trees, woodland and hedgerows should be protected and retained wherever possible'. Some loss of trees and hedgerows is likely to be inevitable as it is almost always necessary to remove hedgerows to accommodate vehicular access to the site.	Not stated	No	No	Whilst promoting the protection and retention of trees, woodland and hedgerows the policy does provide scope for removal where this is clearly demonstrated and where adequate mitigation is provided.  Trees, woodlands and hedgerows provide multiple benefits which are identified within the NPPF and which it is considered justify local plan policy support and protection. Trees, woodland and hedgerows are valuable biodiversity habitats, positively contribute to landscape character, act as wildlife corridors and stepping stones supporting and connecting ecological networks, enhancing the character of urban environments and helping to mitigate and adapt to climate change.  No change proposed.
Pegasus Group for Persimmon Homes	AGT24-030-04-01	Policy NB4	Amendment to the policy to read 'all trees, woodland and hedgerows should be protected and retained wherever possible'. Despite the protection of trees and hedgerows wherever possible, some loss of trees and hedgerows is likely to be inevitable to accommodate vehicular access.	Not stated	No	Not stated	Whilst promoting the protection and retention of trees, woodland and hedgerows the policy does provide scope for removal where this is clearly demonstrated and where adequate mitigation is provided.  Trees, woodlands and hedgerows provide multiple benefits which are identified within the NPPF and which it is considered justify local plan policy support and protection. Trees, woodland and hedgerows are valuable biodiversity habitats, positively contribute to landscape character, act as wildlife corridors and stepping stones supporting and connecting ecological networks, enhancing the character of urban environments and helping to mitigate and adapt to climate change.  No change proposed.
Pegasus Group for Taylor Wimpey	AGT24-030-08-02	Policy NB4	Amendment to the policy to read 'all trees, woodland and hedgerows should be protected and retained wherever possible'.	Not stated	No	Not stated	Whilst promoting the protection and retention of trees, woodland and hedgerows the policy does provide scope for removal where this is clearly demonstrated and where adequate mitigation is provided.

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**CHAPTER 12 & POLICIES NB1-NB4: PROTECTING AND ENHANCING THE NATURAL ENVIRONMENT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							<p>Trees, woodlands and hedgerows provide multiple benefits which are identified within the NPPF and which it is considered justify local plan policy support and protection. Trees, woodland and hedgerows are valuable biodiversity habitats, positively contribute to landscape character, act as wildlife corridors and stepping stones supporting and connecting ecological networks, enhancing the character of urban environments and helping to mitigate and adapt to climate change.</p> <p>No change proposed.</p>
Caven, M	RES24-038-04	Policy NB4	<p>Site 036c This land has been in food production for many years, and vital biodiversity will be extensively harmed</p>	No	No	No	<p>Comment noted.</p> <p>For detailed response in respect of the development of this site refer to responses regarding the impact of development on site 036c above.</p> <p>No change proposed.</p>
Marsh, J	RES24-140-12	Policy NB4	<p>The wording "The intrinsic rural character and local distinctiveness of the South Staffordshire landscape should be maintained and where possible enhanced" is hypocritical when it is proposed to be bulldozed. Request that an independent inspector views what is planned to be destroyed.</p>	Not stated	Not stated	Not stated	<p>Comment noted.</p> <p>The local plan will be the subject of an independent examination undertaken by a Planning Inspector which will consider all representations submitted in relation to the policies and proposals contained within the plan.</p> <p>No change proposed.</p>

**CHAPTER 13 & POLICIES NB5-NB7: CLIMATE CHANGE AND SUSTAINABLE DEVELOPMENT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
<b>GENERAL ISSUES: CHAPTER 13 (inc specific paras references)</b>							
Staffordshire County Council	STA24-044-12	13.1	It is encouraging to see Climate Change running through the whole Plan and setting specific asks across a number of areas in relation to climate change mitigation and adaptation. We fully support the soundness of the Plan in relation to Climate change.	Yes	Yes	Yes	Comments noted.
Fanthom, G	RES24-066-01	13.4	Local plan is not fit for purpose to tackle the climate change crisis that itself has been declared by SSDC. -The plan will only increase carbon emissions rather than reduce them	No	No	No	The Plan takes a pro-active role on tackling climate change through policies NB5 and NB6 among others.  No change proposed.
Watt, J	RES24-246-13	13.17	Lane adjacent to proposed site 036c – land south of Stafford, already liable to flooding in several places making it impassable. Also can be closed due to heavy snowfall.  Site 036c should remain as agricultural land.	No	No	No	All proposed allocations have been screened by the council against fluvial flood zones to determine unsuitable sites within flood zone 3. Remaining sites have been assessed by the Lead Local Flood Authority (LLFA) to determine sites which presented unmitigable flood risk(s). This process is set out in more detail in the Strategic Flood Risk Assessment and Sequential Test Topic Paper 2024. A site specific SFRA will also be completed as part of the planning application process which will ensure any flooding issues are fully mitigated.  No change proposed.
Staffordshire County Council	STA24-044-13	13.18	Please can the risk of flooding from artificial sources be included in the paragraph. For example, reservoir overtopping or breach and canal breaches can be a significant source of flood risk that should be considered.	Yes	No	Yes	<b>Minor modification 043:</b>  <b>Para 13.18:</b>  Flood risk arises from several sources; River Flooding (fluvial), Surface Water, groundwater, sewers, <b>artificial sources (e.g. canal breaches)</b> , and where ordinary watercourses become overwhelmed. These sources have been examined in the Strategic Flood Risk Assessment (SFRA) which informs this plan. Developers should refer to the SFRA when preparing proposals and their approach should reflect and take into account its contents.
Environment Agency	STA24-019-01	Appendix A	The Phase 1 Scoping Water Cycle Study, undertaken by JBA in February 2020 has not been updated since our previous comments in relation to this plan which highlighted where assessments were out of date. What discussions the Council has had with the water companies regarding timescales for development and how Severn Trent Water and South Staffs Water will meet the new demand arising from development in the South Staffs area? As no Detailed WCS published, we trust	Not stated	Not stated	Not stated	Engagement has taken place with Severn Trent Water through the plan preparation.  This is detailed in the Strategic Flood Risk Assessment and Sequential Test Topic Paper 2024 with the 2Severn Trent Water Sewer Capacity Assessment – March 2024” set out in Appendix 2 of that document.

**CHAPTER 13 & POLICIES NB5-NB7: CLIMATE CHANGE AND SUSTAINABLE DEVELOPMENT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			that this matter has been discussed between your Authority and Severn Trent Water to ensure the implications of the proposed growth on this resource has been fully explored.				
<b>POLICY NB5: RENEWABLE AND LOW CARBON ENERGY GENERATION</b>							
Kinver Parish Council	STA24-025-11	Policy NB5	We welcome the support expressed for renewable and sustainable energy. We are however surprised that there is no mention of specific support and encouragement of rooftop solar, which is less hampered by infrastructure inadequacies.	Not stated	Not stated	Not stated	Support noted. Most domestic rooftop solar would be classed as Permitted Development so a specific policy is not required.  No change proposed.
Penkridge Parish Council	STA24-036-01	Policy NB5	Wind turbines and the Anaerobic Digester are established. There now appears to be the opportunity to preserve the countryside with the proposals for Solar energy.	Not stated	Not stated	Not stated	All forms of renewable energy are required in order to meet the Government net zero targets with specific schemes being considered on a case-by-case basis. Solar proposals are usually granted temporary permission with the land re-instated to its original use after the given time.  No change proposed.
RCA Regeneration for Barberrry Developments	AGT24-035-01-02	Policy NB5	The contribution of housing development to creating renewable and low carbon energy generation should be acknowledged within policy NB5, for the introduction of technologies such as Air and Ground Source Heat Pumps, solar PVs and EV charging.	No	No	No	Proposed policy NB6 specifies renewable energy in residential development and is not relevant to this policy which focuses on larger scale renewable energy projects.  No change proposed.
RCA Regeneration for Seven Capital	AGT24-035-03-02	Policy NB5	The contribution of housing development to creating renewable and low carbon energy generation should be acknowledged within policy NB5, for the introduction of technologies such as Air and Ground Source Heat Pumps, solar PVs and EV charging.	Not stated	No	No	Proposed policy NB6 specifies renewable energy in residential development and is not relevant to this policy which focuses on larger scale renewable energy projects.  No change proposed.
RCA Regeneration for Richborough Estates	AGT24-035-02-02	Policy NB5	The contribution of housing development to creating renewable and low carbon energy generation should be acknowledged within policy NB5, for the introduction of technologies such as Air and Ground Source Heat Pumps, solar PVs and EV charging.	Not stated	No	No	Proposed policy NB6 specifies renewable energy in residential development and is not relevant to this policy which focuses on larger scale renewable energy projects.  No change proposed.
CPRE West Midlands Regional Group	STA24-014-08	Policy NB5	CPRE favours rooftop renewables with the use of productive farmland as a last resort. The plan should be amended on page 144 first paragraph to insert after 'previously developed land' the phrase 'including on rooftops, above car parks and other developed land.'	Not stated	Not stated	Not stated	Rooftop and car part solar schemes are unlikely to be of sufficient scale to represent a viable alternative to larger scale solar development.  No change proposed.
National Highways	STA24-032-01	Policy NB5	National Highways supports the opportunities to meet net zero ambitions, and we welcome the opportunity to work with stakeholders to reduce the impact of carbon emissions on the environment. Sites will be reviewed in the context of the National Highways Net Zero Plan. National Highways also	Not stated	Not stated	Not stated	Comments noted.

**CHAPTER 13 & POLICIES NB5-NB7: CLIMATE CHANGE AND SUSTAINABLE DEVELOPMENT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			welcomes the inclusion of specific policies within the Plan to directly tackle climate change with initiatives such as NB5 – Renewable and low carbon energy generation. We appreciate the effort taken in developing these policies and consider this to be aligned with the expectations set out in the National Planning Policy Framework and National Highways’ Net Zero Strategy.				
Marsh, J	RES24-140-13	Policy NB5	SSDCI has introduced nothing in Wombourne to support or encourage the driving of electric vehicles. As usual it’s on working people to part with our own money to somehow save the environment. SSDC are prepared to cut down a load of trees, bulldoze three fields and add around 500 extra cars to the village. Very renewable and sustainable, especially with no train station or useful public transport links.	Not stated	Not stated	Not stated	Electric vehicle charging will be required at all new residential properties as well as provision at non-residential development in accordance with Appendix H – parking standards.  No change proposed.
<b>POLICY NB6A: NET ZERO NEW BUILD RESIDENTIAL DEVELOPMENT (OPERATIONAL ENERGY)</b>							
PlanIT Planning & Development for Hampton Oak Developments	AGT24-032-02-09	Policy NB6A	Policy NB6 should be removed as it will jeopardise the deliverability and viability of residential schemes. This policy is unnecessary as the proper framework for delivering carbon reduction is through the Building Regulations legislative framework.  Policy NB6 requires a 10% improvement to the Part L 2021 Target for Fabric Energy Efficiency. However, that benchmark standard is already out of date and is replaced by the introduction of the 2022 changes to the Part L Building Regulations; those changes achieve the 10 % improvement which is referenced in policy NB6. Developers will not be able to comply with the post occupation monitoring requirement at policy NB6 A7. It will be extremely difficult to access that data from individual households over a 5-year period post occupation. We consider, therefore, that this part of the policy is not deliverable.	Yes	No	Yes	Policy NB6A has been fully costed through the 2022 viability study with an uplift on build costs of 4.73% for flats and 7% for houses factored in.  The policy uses the latest Part L 2012 Building Regulations implemented from June 2022. a further version is expected to arrive in 2025 (the Future Homes Standard).  Further guidance on how to achieve compliance with this policy and the operation of any carbon offsetting fund will be set out in a Sustainable Construction and Climate Change SPD.
Kinver Parish Council	STA24-025-12	Policy NB6A	Welcome policy. Would encourage the council to consider whether additional support for energy-saving retrofit and rooftop solar and would be a suitable target for offsetting options. Conversely, we urge the council to review scientific carbon-balance evidence before including planting of trees among offsetting options. Priority should be given to reduction of fossil fuel use and expansion of renewable energy.	Not stated	Not stated	Not stated	Comments noted. Policy NB6A seeks to reduce carbon emissions from new buildings with offsetting only where this cannot be achieved.  No change proposed.
Goldfinch Town Planning Services	AGT24-020-01-01	Policy NB6A	Goldfinch Town Planning Services has concerns that highly onerous Climate Change Net Zero policies are being taken forward and being forced through into the emerging Local Plan Review, which will place a financially damaging burden on new housing development proposals coming forward	No	No	No	Policy NB6A has been fully costed through the 2022 viability study with an uplift on build costs of 4.73% for flats and 7% for houses factored in.  No change
NHS Property Services	STA24-034-01	Policy NB6A	The NHS requires all new development projects to be net zero carbon, and NHSPS fully support policies that promote carbon neutral development. In implementing these, we highlight that	Not stated	Not stated	Not stated	Comments noted.



**CHAPTER 13 & POLICIES NB5-NB7: CLIMATE CHANGE AND SUSTAINABLE DEVELOPMENT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			NHS property could benefit from carbon offset funds collected where on-site carbon mitigations cannot be met.				
Avison Young for Crest Nicholson	AGT24-004-02-03	Policy NB6A	<p>It has not been robustly demonstrated that the proposals to require carbon emission reductions through energy efficiency measures beyond those in Building Regulations would not impact on viability, housing supply and affordability. The policy is not, therefore, justified and should be deleted. Council’s evidence indicates that the proposed net zero carbon policy requirements in Policy NB6A would equate to a 7.2% build cost uplift. However, the ‘Appraisal Summaries’ at Appendix II of the Viability Study only appear to have allowed for 5.7% build cost uplift.</p> <p>Notwithstanding the above, the wording of Part A1 and A2 of Policy NB6A is also inflexible and does not allow for a scenario where it can be demonstrated that meeting the standards specified is not technically feasible or viable in accordance with the requirements of the WMS. If this policy is to be retained, then the wording of Part A1 and A2 requires amendment to provide the necessary flexibility.</p> <p>Evidence to support section A4 suggests that offsetting does not need to be considered in viability assessments because the price is equal to the cost of on-site measures and so does not represent an additional cost to the developer. However, no evidence is provided to back up this statement. There is, therefore, in Crest’s view a risk that Part A4 of Policy NB6A could undermine the delivery of housing in the District. In the absence of appropriate justification, this element of Policy NB6A should be deleted. Notwithstanding the above, the policy does not set out how offsetting contributions would be calculated and how contributions would be used, instead deferring to Paragraph 13.11 of the supporting text. If the requirement for offsetting is to be retained this should be set out in the Policy itself. If the requirement for offsetting is to be retained, the Policy should be amended to allow carbon emissions to be offset to the greatest extent that is viable.</p> <p>Part A5 of Policy NB6A requires an “assured performance method” to be implemented throughout all phases of construction. However, there is no definition in either the draft Policy or the supporting text over what is meant by this. This requires clarification to ensure that the policy is clearly written and unambiguous.</p> <p>Part A7 unduly onerous and entirely unrealistic, and should be removed in its entirety.</p>	Yes	No	Not stated	<p>Further viability testing has been carried out to reflect the updated Policy NB6 and demonstrates the policy remains viable. This is set out in further detail in the Further Note on Viability: Follow-up to Regulation 19 Consultation (November 2024).</p> <p>Part A4 of the policy allows offsetting to take place where compliance with the policy is demonstrated to be unachievable.</p> <p>The Sustainable Construction Policy Addendum 2024 document sets out how the policy complies with the 13<sup>th</sup> December 2023 Written Ministerial Statement on energy efficiency standards in local planning.</p> <p>The policy and supporting text provide a clear framework of how offsetting contributions will be calculated, captured and spent. This will be expanded upon in a in a Sustainable Construction and Climate Change SPD.</p>

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
Lower Penn Parish Council	STA24-028-01	Policy NB6A	LATE SUBMISSION Whilst LPPC support the commitment to delivering Net Zero homes, and support policy NB6 which sets out how the DC's approach, there is no significant update to the climate strategy that reflects the vanishingly small likelihood of limiting global warming to 1.5c.	Not stated	Yes	Not stated	The Local Plan is playing an active role in delivering net zero through these policies.  No change proposed.
Gladman Developments Ltd	AGT24-019-01-01	Policy NB6A	Concerned that the policy seeks to go further and faster than national legislation and policy changes. There is a lack of clarity, justification and robust evidence for the many facets of the policy as detailed, and as a consequence we consider that Policy NB6a is 'unsound'.  the policy fails to differentiate between the levels of detail required between Full, Outline and Reserved Matter applications which could seriously undermine the overarching aims. If the policy is to remain in the Plan, it must clearly differentiate between what type of information is required for different types of applications.  Criteria A7 as drafted sets out that development proposals of more than 50 dwellings should monitor and report total energy use and renewable energy generation values on an annual basis for 5 years from first occupation. This requirement is exceptionally excessive and would appear to intrude into people's privacy.	Not stated	No	No	The Climate Change Topic Paper 2024 and The Sustainable Construction Policy 2024 documents set out the justification for the policy.  Further guidance on how to achieve compliance with this policy and the operation of any carbon offsetting fund will be set out in a Sustainable Construction and Climate Change SPD.
RCA Regeneration for Barberry Developments	AGT24-035-01-02	Policy NB6A	Building regulations regime is the best way to set standards for energy performance in new buildings. We would refer the council to the Ministerial Statement of 13 December 2023 which sets out that:  "... the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations".	No	No	No	The Climate Change Topic Paper 2024 and The Sustainable Construction Policy 2024 documents set out the justification for the policy. The Sustainable Construction Policy Addendum 2024 document sets out how the policy complies with the 13th December 2023 Written Ministerial Statement on energy efficiency standards in local planning.  No change proposed.
RCA Regeneration for Seven Capital	AGT24-035-03-02	Policy NB6A	Building regulations regime is the best way to set standards for energy performance in new buildings. We would refer the council to the Ministerial Statement of 13 December 2023 which sets out that:  "... the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations".	Not stated	No	No	The Climate Change Topic Paper 2024 and The Sustainable Construction Policy 2024 documents set out the justification for the policy. The Sustainable Construction Policy Addendum 2024 document sets out how the policy complies with the 13th December 2023 Written Ministerial Statement on energy efficiency standards in local planning.  No change proposed.
Evolve Planning &	AGT24-	Policy	A locally specific sustainable construction requirement is	Yes	No	Yes	The Climate Change Topic Paper 2024 and The

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
Design for Lovell Homes	017-05-01	NB6A	unnecessary and without justification for deviation from the Government's Future Homes standards to be considered through building regulations. Full details on the Climate Change Study & other Regulations detailed in paragraphs 11.1 – 11.10 of the full representation. These policies are fundamentally unsound and should be removed.				Sustainable Construction Policy 2024 documents set out the justification for the policy. The Sustainable Construction Policy Addendum 2024 document sets out how the policy complies with the 13th December 2023 Written Ministerial Statement on energy efficiency standards in local planning.  No change proposed.
Evolve Planning & Design for Keon Homes	AGT24-017-04-01	Policy NB6A	A locally specific sustainable construction requirement is unnecessary and without justification for deviation from the Government's Future Homes standards to be considered through building regulations. Full details on the Climate Change Study & other Regulations detailed in paragraphs 11.1 – 11.11 of the full representation. These policies are fundamentally unsound and should be removed.	Yes	No	Yes	The Climate Change Topic Paper 2024 and The Sustainable Construction Policy 2024 documents set out the justification for the policy.
Evolve Planning & Design for Four Ashes Road Ltd	AGT24-017-03-01	Policy NB6A	A locally specific sustainable construction requirement is unnecessary and without justification for deviation from the Government's Future Homes standards to be considered through building regulations. Full details on the Climate Change Study & other Regulations detailed in paragraphs 10.1 – 10.10 of the full representation. These policies are fundamentally unsound and should be removed.	Yes	No	Yes	The Climate Change Topic Paper 2024 and The Sustainable Construction Policy 2024 documents set out the justification for the policy.
Evolve Planning & Design for Cameron Homes	AGT24-017-02-01	Policy NB6A	A locally specific sustainable construction requirement is unnecessary and without justification for deviation from the Government's Future Homes standards to be considered through building regulations. Full details on the Climate Change Study & other Regulations detailed in paragraphs 11.1 – 11.11 of the full representation. These policies are fundamentally unsound and should be removed.	Yes	No	Yes	The Climate Change Topic Paper 2024 and The Sustainable Construction Policy 2024 documents set out the justification for the policy.
Evolve Planning & Design for Bloor Homes	AGT24-017-01-09	Policy NB6A	Land East of Bilbrook - Bloor Homes considers NB6A and NB6C to be overly complex, adding a non-standard level of assessment that sits outside that required by building regulations. A locally specific sustainable construction requirement is unnecessary and without justification for deviation from the Government's Future Homes standards to be considered through building regulations. The Council's Viability Study fails to take into account the additional burden placed on development as a result of NB6A and NB6C. These costs are set out in the Bioregional reports, published in 2024, after the publication of the Viability Study in	Yes	No	Yes	The Climate Change Topic Paper 2024 and The Sustainable Construction Policy 2024 documents set out the justification for the policy.  Policy NB6A has been fully costed through the 2022 viability study with an uplift on build costs of 4.73% for flats and 7% for houses factored in. The Bio-regional study demonstrated that the policy could be achieved within the uplift on build costs assumed within the 2022 viability study.

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			2022. These policies are fundamentally unsound and should be removed.				
Evolve Planning & Design for Bloor Homes	AGT24-017-01-09	Policy NB6A	A locally specific sustainable construction requirement is unnecessary and without justification for deviation from the Government's Future Homes standards to be considered through building regulations. The Council should delete policies.	Yes	No	Yes	The Climate Change Topic Paper 2024 and The Sustainable Construction Policy 2024 documents set out the justification for the policy.
Savills UK Ltd for Taylor Wimpey	AGT24-037-05-10	Policy NB6A	We object to NB6A as it goes beyond national requirements. Extracts from the Written Ministerial Statement can be found in the full representation. Given NB6A is proposing requirements much greater than existing regulations, further clarity is sought on the assumptions made in the Viability Study and where the costs have been taken from. NB6A should be amended to reflect current national requirements.	Not stated	No	Not stated	The Climate Change Topic Paper 2024 and The Sustainable Construction Policy 2024 documents set out the justification for the policy. The Sustainable Construction Policy Addendum 2024 document sets out how the policy complies with the 13th December 2023 Written Ministerial Statement on energy efficiency standards in local planning.  Policy NB6A has been fully costed through the 2022 viability study with an uplift on build costs of 4.73% for flats and 7% for houses factored in  No change proposed.
Pegasus Group for Richborough Estates	AGT24-030-05-02	Policy NB6A	The recent Ministerial Statement on Local Energy Efficiency Standards dated 13th December 2023 was clear that Local Plans should not be placing onerous requirements on developers which exceed the requirements of national Building Regulations.  It is noted that the Council have not undertaken an updated viability study to support the 2024 Publication Plan with both the Sustainable Construction Policy NB6 Task A Report (2023) and Sustainable Construction Policy NB6 - Addendum Report (2024) postdating the most up to date Viability Report 2022. The Addendum Report sets out that the 63% reduction on the Part L 2021 TER (regulated carbon emissions) was the most carbon effective option that remained within the 7% cost uplift that the viability had previously tested. There is the risk however of making various assumptions here without vigorously testing against the specifics of the revised policy and the potential cost implications for proposed developments and whilst the policy incorporates the ability to demonstrate a site specific viability case a thorough and up to date assessment should be undertaken to assess alongside the implications of Policy NB6A other policy requirements set out in the 2024 Publication Plan.  Regarding clause A7 of the policy, there are issues of data	Yes	No	Yes	The Climate Change Topic Paper 2024 and The Sustainable Construction Policy 2024 documents set out the justification for the policy. The Sustainable Construction Policy Addendum 2024 document sets out how the policy complies with the 13th December 2023 Written Ministerial Statement on energy efficiency standards in local planning.  Policy NB6A has been fully costed through the 2022 viability study with an uplift on build costs of 4.73% for flats and 7% for houses factored in. The Bio-regional study demonstrated that the policy could be achieved within the uplift on build costs assumed within the 2022 viability study.  It is important to ensure that the policy is effectively implemented in practice. Therefore, post occupancy monitoring mechanisms are important to ensure the policy is achieved.  Further guidance on how to achieve compliance and monitoring requirements of this policy will be set out in a Sustainable Construction and Climate Change SPD. Other adopted Local Plans such as



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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<p>protection and consent surrounding the recording and sharing of data with a third party and/or the reliance on the cooperation of private home owners to share data in order to meet with the requirements of any monitoring condition associated with Policy NB6A.</p> <p>Secondly, a question arises as to the purpose of such widespread collation of such data. Extracting, what is in effect lifestyle data, from private individuals, is neither considered desirable nor practical in this regard. There is no evidence to suggest that the Council have considered or addressed the GDPR implications of this requirement, its effect on 'mortgage-ability', or indeed its effect on sales values.</p>				the Milton Keynes Local Plan 2019 (adopted) have adopted similar monitoring requirements which have been found sound. The Council is confident that the appropriate monitoring mechanisms can be put in place without the impact on homeowners / occupiers as achieved elsewhere.
Marrons for L&Q Estates	AGT24-027-03-01	Policy NB6A	Consider that this policy is unnecessary given it seeks to go further than current Building Regulations and given the Future Homes Standard which is due to be implemented in 2025, in advance of the likely adoption of the SSLPR. This will update Part L of Building Regulations and require new build dwellings to be future-proofed with low carbon heating and world-leading levels of energy efficiency. It is noted that a Written Ministerial Statement issued by Baroness Penn and delivered by Housing and Planning Minister Lee Rowley MP in December 2023 sets out clear direction on the need for Local Plans to avoid setting energy efficiency standards which go beyond current and future planned Building Regulations requirements.	Yes	No	Yes	The Climate Change Topic Paper 2024 and The Sustainable Construction Policy 2024 documents set out the justification for the policy. The Sustainable Construction Policy Addendum 2024 document sets out how the policy complies with the 13th December 2023 Written Ministerial Statement on energy efficiency standards in local planning.
Pegasus Group for Richborough Estates	AGT24-030-05-02	Policy NB6A	Although a move towards delivering greater energy efficiency is supported, it is important that the Development Plan's response to climate change is realistic and consistent with national legislation and policy provisions. The recent Ministerial Statement was clear that Local Plans should not be placing onerous requirements on developers which exceed the requirements of national Building Regulations. The Local Plan is not supported by robust evidence to support this approach. There is the risk of making various assumptions without vigorously testing against the specifics of the revised policy and the potential cost implications for proposed developments. The policy conflicts with Government advice and should be deleted.	Yes	No	Yes	The Climate Change Topic Paper 2024 and The Sustainable Construction Policy 2024 documents set out the justification for the policy. The Sustainable Construction Policy Addendum 2024 document sets out how the policy complies with the 13th December 2023 Written Ministerial Statement on energy efficiency standards in local planning.
Pegasus Group for Richborough Estates	AGT24-030-05-02	Policy NB6A	Clause A7 – there are issues of data protection and consent surrounding the recording and sharing of data with a third party and/or the reliance on the cooperation of private home-owners to share data in order to meet with the requirements of any monitoring condition associated with the policy. There is no evidence that the Council have considered or addressed the GDPR implications of this requirement, it is not practical to be delivered in the form proposed and is therefore considered	Yes	No	Yes	Further guidance on how to achieve compliance and monitoring requirements of this policy will be set out in a Sustainable Construction and Climate Change SPD. Other adopted Local Plans such as the Milton Keynes Local Plan 2019 (adopted) have adopted similar monitoring requirements which have been found sound. The Council is confident that the appropriate monitoring mechanisms can be put in place without the impact on



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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			unsound.				homeowners / occupiers as achieved elsewhere.  No change proposed.
Pegasus Group for Clowes Developments	AGT24-030-02-02	Policy NB6A	Although a move towards delivering greater energy efficiency is supported, it is important that the Development Plan's response to climate change is realistic and consistent with national legislation and policy provisions. The recent Ministerial Statement was clear that Local Plans should not be placing onerous requirements on developers which exceed the requirements of national Building Regulations. The Local Plan is not supported by robust evidence to support this approach. There is the risk of making various assumptions without vigorously testing against the specifics of the revised policy and the potential cost implications for proposed developments. The policy conflicts with Government advice and should be deleted.	Not stated	No	No	The Climate Change Topic Paper 2024 and The Sustainable Construction Policy 2024 documents set out the justification for the policy. The Sustainable Construction Policy Addendum 2024 document sets out how the policy complies with the 13th December 2023 Written Ministerial Statement on energy efficiency standards in local planning.  No change proposed.
Pegasus Group for Clowes Developments	AGT24-030-02-02	Policy NB6A	Clause A7 – there are issues of data protection and consent surrounding the recording and sharing of data with a third party and/or the reliance on the cooperation of private home-owners to share data in order to meet with the requirements of any monitoring condition associated with the policy. There is no evidence that the Council have considered or addressed the GDPR implications of this requirement, it is not practical to be delivered in the form proposed and is therefore considered unsound.	Not stated	No	No	Further guidance on how to achieve compliance and monitoring requirements of this policy will be set out in a Sustainable Construction and Climate Change SPD. Other adopted Local Plans such as the Milton Keynes Local Plan 2019 (adopted) have adopted similar monitoring requirements which have been found sound. The Council is confident that the appropriate monitoring mechanisms can be put in place without the impact on homeowners / occupiers as achieved elsewhere.  No change proposed.
Pegasus Group for Miller Homes	AGT24-030-03-15	Policy NB6A	Turley have provided comments on this policy in Appendix 3. It is considered that any feasible and viable policy should be restricted to regulated energy only. Any emissions reduction targets should be in line with the latest national standards. We broadly support the addition of a mechanism to offset residual carbon emissions provided that the scope and cost of such a policy has been tested. For soundness, amendments are proposed to the wording of the policy so that: Reference to unregulated energy is removed; Energy efficiency and renewable energy targets are removed; Timeframes are incorporated for the spending of offsetting obligations; Post occupancy evaluation is for a sample size of 10% of homes.	Not stated	No	No	The Climate Change Topic Paper 2024 and The Sustainable Construction Policy 2024 documents set out the justification for the policy. The Sustainable Construction Policy Addendum 2024 document sets out how the policy complies with the 13th December 2023 Written Ministerial Statement on energy efficiency standards in local planning.  No change proposed.
Pegasus Group for Persimmon Homes	AGT24-030-04-01	Policy NB6A	Although a move towards delivering greater energy efficiency is supported, it is important that the Development Plan's response to climate change is realistic and consistent with national legislation and policy provisions. The recent Ministerial	Not stated	No	Not stated	The Climate Change Topic Paper 2024 and The Sustainable Construction Policy 2024 documents set out the justification for the policy. The Sustainable Construction Policy Addendum 2024

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			Statement was clear that Local Plans should not be placing onerous requirements on developers which exceed the requirements of national Building Regulations. The Local Plan is not supported by robust evidence to support this approach. There is the risk of making various assumptions without vigorously testing against the specifics of the revised policy and the potential cost implications for proposed developments. The policy conflicts with Government advice and should be deleted.				document sets out how the policy complies with the 13th December 2023 Written Ministerial Statement on energy efficiency standards in local planning.
Pegasus Group for Persimmon Homes	AGT24-030-04-01	Policy NB6A	Clause A7 – there are issues of data protection and consent surrounding the recording and sharing of data with a third party and/or the reliance on the cooperation of private home-owners to share data in order to meet with the requirements of any monitoring condition associated with the policy. There is no evidence that the Council have considered or addressed the GDPR implications of this requirement, it is not practical to be delivered in the form proposed and is therefore considered unsound.	Not stated	No	Not stated	Further guidance on how to achieve compliance and monitoring requirements of this policy will be set out in a Sustainable Construction and Climate Change SPD. Other adopted Local Plans such as the Milton Keynes Local Plan 2019 (adopted) have adopted similar monitoring requirements which have been found sound. The Council is confident that the appropriate monitoring mechanisms can be put in place without the impact on homeowners / occupiers as achieved elsewhere.  No change proposed.
Pegasus Group for Taylor Wimpey	AGT24-030-08-02	Policy NB6A	Although a move towards delivering greater energy efficiency is supported, it is important that the Development Plan’s response to climate change is realistic and consistent with national legislation and policy provisions. The recent Ministerial Statement was clear that Local Plans should not be placing onerous requirements on developers which exceed the requirements of national Building Regulations. The Local Plan is not supported by robust evidence to support this approach. There is the risk of making various assumptions without vigorously testing against the specifics of the revised policy and the potential cost implications for proposed developments. The policy conflicts with Government advice and should be deleted.	Not stated	No	Not stated	The Climate Change Topic Paper 2024 and The Sustainable Construction Policy 2024 documents set out the justification for the policy. The Sustainable Construction Policy Addendum 2024 document sets out how the policy complies with the 13th December 2023 Written Ministerial Statement on energy efficiency standards in local planning.
Pegasus Group for Taylor Wimpey	AGT24-030-08-02	Policy NB6A	Clause A7 – there are issues of data protection and consent surrounding the recording and sharing of data with a third party and/or the reliance on the cooperation of private home-owners to share data in order to meet with the requirements of any monitoring condition associated with the policy. There is no evidence that the Council have considered or addressed the GDPR implications of this requirement, it is not practical to be delivered in the form proposed and is therefore considered unsound.	Not stated	No	Not stated	Further guidance on how to achieve compliance and monitoring requirements of this policy will be set out in a Sustainable Construction and Climate Change SPD. Other adopted Local Plans such as the Milton Keynes Local Plan 2019 (adopted) have adopted similar monitoring requirements which have been found sound. The Council is confident that the appropriate monitoring mechanisms can be put in place without the impact on homeowners / occupiers as achieved elsewhere.  No change proposed.
PlanIT Planning & Development for	AGT24-032-04-	Policy NB6A	We support measures to reduce carbon emissions through both construction and operation and recognise the Council’s ambition	Yes	No	Yes	The Climate Change Topic Paper 2024 and The Sustainable Construction Policy 2024 documents

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
Miller Homes	09		<p>in setting policies which go beyond national requirements. Any specific requirements which go beyond the current Local Plan and national guidance need to be supported by an appropriate evidence base. The unregulated energy consumption is the function of the residents' use of the building and therefore the requirement on the developer to reduce emissions from residents' unregulated energy use is not appropriate.</p> <p>We agree with the Council's policy requirement to achieve regulated carbon emissions reduction through energy efficiency features. Any emission reduction targets should be in line with latest national standards. Details from the Written Ministerial Statement are in the 'Energy Efficiency' paragraph in representation 9. We support the policy's requirement on provision of renewable energy generation to help reduce carbon emissions, we are cautious over a requirement to achieve a 100% reduction in TER via onsite generation. We do not believe the renewable energy target in regards to building footprint is achievable.</p> <p>We broadly support the addition of a mechanism to offset residual carbon emissions provided that the scope and cost of such a policy has been tested. We agree that offsetting payments should be linked to the Government's Green Book carbon pricing and should take account of grid decarbonisation. We have concerns that the policy refers to both regulated and unregulated emissions for the reasons outlined above, we suggest the policy is amended to offsetting remaining regulated emissions only. The policy needs to include reference to delivering the required carbon offset within a reasonable timeframe. Details on viability can be found in the relevant paragraph in representation 9. Proposed updates to the policy can be found in representation 9.</p>				<p>set out the justification for the policy. The Sustainable Construction Policy Addendum 2024 document sets out how the policy complies with the 13th December 2023 Written Ministerial Statement on energy efficiency standards in local planning.</p> <p>In regard to delivering offsetting in a reasonable timeframe, it is considered appropriate for these clawbacks to be set out in the Section 106 agreement rather than in policy.</p>
National Highways	STA24-032-01	Policy NB6A	<p>National Highways supports the opportunities to meet net zero ambitions, and we welcome the opportunity to work with stakeholders to reduce the impact of carbon emissions on the environment. Sites will be reviewed in the context of the National Highways Net Zero Plan. National Highways also welcomes the inclusion of specific policies within the Plan to directly tackle climate change with initiatives such as NB6A – Net zero new build residential development (operational energy). We appreciate the effort taken in developing these policies and consider this to be aligned with the expectations set out in the National Planning Policy Framework and National Highways' Net Zero Strategy.</p>	Not stated	Not stated	Not stated	Comments noted.
Advance Land & Planning for Seabridge	AGT24-002-02-01	Policy NB6A	<p>We do not consider that there is a clear and compelling evidence base to require carbon reduction measures over and above those introduced by the Government's recent changes to</p>	Not stated	Not stated	Not stated	The Climate Change Topic Paper 2024 and The Sustainable Construction Policy 2024 documents set out the justification for the policy. The

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
Developments			Building Regulations Part L and its proposals for the Future Homes Standard. A Written Ministerial Statement "the Government do not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planning building regulations." We strongly object to Policy NB6A which we consider is not justified and will detrimentally impact on the viability and deliverability of new housing.				Sustainable Construction Policy Addendum 2024 document sets out how the policy complies with the 13th December 2023 Written Ministerial Statement on energy efficiency standards in local planning.  Policy NB6 has been fully costed through the 2022 viability study with an uplift on build costs of 4.73% for flats and 7% for houses factored in. The Bio-regional study demonstrated that the policy could be achieved within the uplift on build costs assumed within the 2022 viability study.  No change proposed.
Advance Land and Planning Ltd for BSA Environmental Ltd	AGT24-002-01-01	Policy NB6A	We do not consider that there is a clear and compelling evidence base to require carbon reduction measures over and above those introduced by the Government's recent changes to Building Regulations Part L (mid-2022) and its proposals for the Future Homes Standard (2025). We strongly object to Policy NB6A (A1-A5), which we consider is not justified and which will detrimentally impact on the viability and deliverability of new housing development in the District.	Not stated	Not stated	Not stated	The Climate Change Topic Paper 2024 and The Sustainable Construction Policy 2024 documents set out the justification for the policy. The Sustainable Construction Policy Addendum 2024 document sets out how the policy complies with the 13th December 2023 Written Ministerial Statement on energy efficiency standards in local planning.  Policy NB6 has been fully costed through the 2022 viability study with an uplift on build costs of 4.73% for flats and 7% for houses factored in. The Bio-regional study demonstrated that the policy could be achieved within the uplift on build costs assumed within the 2022 viability study.  No change proposed.
Advance Land & Planning for Stephens, M	AGT24-002-03-01	Policy NB6A	We do not consider that there is a clear and compelling evidence base to require carbon reduction measures over and above those introduced by the Government's recent changes to Building Regulations Part L and its proposals for the Future Homes Standard. A Written Ministerial Statement "the Government do not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planning building regulations."  We strongly object to Policy NB6A which we consider is not justified and will detrimentally impact on the viability and deliverability of new housing.	Not stated	Not stated	Not stated	The Climate Change Topic Paper 2024 and The Sustainable Construction Policy 2024 documents set out the justification for the policy. The Sustainable Construction Policy Addendum 2024 document sets out how the policy complies with the 13th December 2023 Written Ministerial Statement on energy efficiency standards in local planning.
Harris Lamb for Redrow Homes	AGT24-022-03-13	Policy NB6A	RH considers that the policy exceeds the current level of building regulations for energy efficiency and would therefore present an onerous requirement on developers to go beyond what is currently required. In principle RH support the move to more energy efficient homes we do not consider that the	Yes	No	Not stated	The Climate Change Topic Paper 2024 and The Sustainable Construction Policy 2024 documents set out the justification for the policy. The Sustainable Construction Policy Addendum 2024 document sets out how the policy complies with



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			application of this policy is the appropriate route to achieve this. We do not consider the policy is sound as it is not consistent with national policy and represents a duplication of control over matters that building regulations currently address. RH would wish to see the policy deleted or significantly reworded.				the 13th December 2023 Written Ministerial Statement on energy efficiency standards in local planning.  No change proposed.
Turley Associates for Bellway Homes	AGT24-041-01-02	Policy NB6A	<p>Any feasible and viable policy should be restricted to regulated energy only. The unregulated energy consumption is the function of residents' use and cannot be influenced by the developer. Points A2 – A4 refer to regulated energy and any requirements which go beyond national standards should only relate to regulated energy.</p> <p>Emissions reduction targets should be in line with the latest national standards. The policy should be updated to only reference alignment with the 2025 Future Homes Standard requirements.</p> <p>Maximising the provision of renewable energy could lead to unintended consequences or contradictions in design. The policy should be updated to achieve net zero regulated carbon emissions where feasible and viable, in line with latest national policy requirements.</p> <p>Offsetting – the policy refers to both regulated and unregulated emissions and therefore should be amended to regulated emissions only. A viability assessment for the cost of offsetting carbon has to be undertaken and included as part of the viability assessment for the policy to be sound. The Council should set out its expectation on a timeframe for spending the funds collection.</p> <p>Post occupancy evaluation – concerned over lack of clarity with regard to a sample size, which could potentially put a disproportionate burden on the housebuilder. Post-modelling should be carried out on 10% of homes.</p> <p>There are a number of potentially significant omissions from the viability assessment that justifies NB6A, the Council should review the assessment to ensure it is sound and meets the requirements of the NPPF.</p> <p>Text specific to each policy amendment can be found in Appendix 10.</p>	No	No	No	The Climate Change Topic Paper 2024 and The Sustainable Construction Policy 2024 documents set out the justification for the policy. The Sustainable Construction Policy Addendum 2024 document sets out how the policy complies with the 13th December 2023 Written Ministerial Statement on energy efficiency standards in local planning.  No change proposed.
Savills UK Ltd for Barratt Homes	AGT24-037-01-06	Policy NB6A	We object to NB6A as it goes beyond national requirements. Extracts from the Written Ministerial Statement can be found in the full representation. Given NB6A is proposing requirements much greater than existing regulations, further clarity is sought on the assumptions made in the Viability Study and where the costs have been taken from. NB6A should be amended to reflect	Not stated	No	Not stated	The Climate Change Topic Paper 2024 and The Sustainable Construction Policy 2024 documents set out the justification for the policy. The Sustainable Construction Policy Addendum 2024 document sets out how the policy complies with the 13th December 2023 Written Ministerial



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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			current national requirements.				Statement on energy efficiency standards in local planning.  Policy NB6 has been fully costed through the 2022 viability study with an uplift on build costs of 4.73% for flats and 7% for houses factored in. The Bio-regional study demonstrated that the policy could be achieved within the uplift on build costs assumed within the 2022 viability study.  No change proposed.
Home Builders Federation	STA24-024-02	Policy NB6A	Policy NB6A is unsound because it is not positively prepared, is not effective or justified, and does not comply with national policy. The proposed wording suggests that the Council is seeking to move away from the carbon reduction methods set out in Part L of the Building Regulations. HBF supports the Council in seeking to minimise carbon emissions and reduce heat and power demand through energy efficient design. However, the HBF does not consider that the Council setting its own standards is the appropriate method to achieve these outcomes. To be consistent with national policy, HBF request the Council rely on the Building Regulations process as the way to manage improving energy efficiency standards and as such no policy on this issue is needed in the Local Plan. The Written Ministerial Statement clearly states that any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned building regulations should be rejected at examination if they do not have a well-reasoned and robustly costed rationale. HBF also note efforts to decarbonise the national grid, and this raises questions about the whether it is actually appropriate and sustainable to have on-site renewables and/or energy storage when the grid is moving to renewable sources. The HBF also raise concerns over the effective implementation and monitoring of the policy.	No	No	No	The Climate Change Topic Paper 2024 and The Sustainable Construction Policy 2024 documents set out the justification for the policy. The Sustainable Construction Policy Addendum 2024 document sets out how the policy complies with the 13th December 2023 Written Ministerial Statement on energy efficiency standards in local planning.  Policy NB6 has been fully costed through the 2022 viability study with an uplift on build costs of 4.73% for flats and 7% for houses factored in. The Bio-regional study demonstrated that the policy could be achieved within the uplift on build costs assumed within the 2022 viability study.  It is not appropriate to rely on efforts to decarbonise the national grid as the only mechanism to reach net zero and tackle climate change.  No change proposed.
The Planning Bureau for McCarthy Stone	AGT24-033-01-07	Policy NB6A	Whilst C5uncil’s commitment to meeting both its and the UK Government’s target of net zero carbon emissions is commendable, it appears that the Council is going to achieve this through having mandatory carbon and climate standards from adoption of the plan that go beyond government targets. It is our view that any requirement should be ‘stepped’ in line with Government targets and the proposed changes to the building regulations.  This approach is confirmed within the Ministerial Statement (statement no: Statement UIN HCWS123) released on 13th December 2023.	No	No	No	The Climate Change Topic Paper 2024 and The Sustainable Construction Policy 2024 documents set out the justification for the policy. The Sustainable Construction Policy Addendum 2024 document sets out how the policy complies with the 13th December 2023 Written Ministerial Statement on energy efficiency standards in local planning.
<b>POLICY NB6B: NEW BUILD NON-RESIDENTIAL DEVELOPMENT (OPERATIONAL ENERGY)</b>							
Savills UK Ltd for	AGT24-	Policy	Any specific requirements which go beyond the current Local	Yes	No	No	The Climate Change Topic Paper 2024 and The

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
St Modwen & JM Holt	037-04-13	NB6B	<p>Plan and national guidance need to be supported by an appropriate evidence base, including a viability assessment. In this context we have a number of concerns with regards to a number of requirements set out in the Council's sustainability and net zero policies.</p> <p>We object to section 'B1. BREEAM' of the policy as written which states that 'BREEAM outstanding should be targeted and the proposal will be afforded weight in favour where this is achieved.' It is considered that the target should be 'excellent' rather than 'outstanding'. There can, however, be specific circumstances where achieving Excellent or higher can be challenging due to specific site constraints. We would therefore recommend that the policy is updated to provide flexibility and an option for justifying why this might not be achievable. If the target is retained it should reference BREEAM version 6.</p> <p>We object to the wording in section B2. Energy Efficiency which states: 'new non-residential development proposals are expected to achieve a 15% improvement in Part L...'. In light of the 13th December WMS this should be deleted or reworded to 'encourage' rather than 'expect' improvements against Part L.</p> <p>We object to the wording used in Policy B3. On-Site renewable energy. The policy as written states: 'non-residential development must demonstrate the fullest feasible and viable use of on-site renewable energy generation and/or connection...'. We consider that 'must' should be amended to 'where possible should...'. We object to the wording used in B5. Smart Energy Systems and consider it should allow for more flexibility. The use of the word 'should' should be swapped to 'where possible'.</p>				<p>Sustainable Construction Policy 2024 documents set out the justification for the policy. The Sustainable Construction Policy Addendum 2024 document sets out how the policy complies with the 13th December 2023 Written Ministerial Statement on energy efficiency standards in local planning.</p> <p>The watering down of the policy suggested would result in it being less effective in the development management process.</p>
National Highways	STA24-032-01	Policy NB6B	<p>National Highways supports the opportunities to meet net zero ambitions, and we welcome the opportunity to work with stakeholders to reduce the impact of carbon emissions on the environment. Sites will be reviewed in the context of the National Highways Net Zero Plan. National Highways also welcomes the inclusion of specific policies within the Plan to directly tackle climate change with initiatives such as NB6B – New build non – residential development (Operational energy). We appreciate the effort taken in developing these policies and consider this to be aligned with the expectations set out in the National Planning Policy Framework and National Highways' Net Zero Strategy.</p>	Not stated	Not stated	Not stated	Comments noted.
<b>POLICY NB6C: EMBODIED CARBON AND WASTE</b>							
Kinver Parish Council	STA24-025-13	Policy NB6C	<p>We consider that the whole life carbon assessment (RICS) should be compulsory.</p>	Not stated	Not stated	Not stated	It is considered that the policy strikes the appropriate balance by setting embodied carbon targets for larger scale residential and non-residential development whilst encouraging

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							smaller scale development to complete an assessment.  No change proposed.
Savills UK Ltd for St Modwen & JM Holt	AGT24-037-04-14	Policy NB6C	We object to the policy as written. It is not considered common practice to undertake a whole life carbon assessment. If a "limit" is introduced, further flexibility is required to account for abnormal/unavoidable site-specific drivers of carbon which will influence the ability to limit embodied carbon. National embodied carbon targets may supersede local requirements and a caveat to the policy should be introduced to reflect this.	Yes	No	No	The Climate Change Topic Paper 2024 and The Sustainable Construction Policy 2024 documents set out the justification for the policy.  It is considered that the policy strikes the appropriate balance by setting embodied carbon targets for larger scale residential and non-residential development whilst encouraging smaller scale development to complete an assessment.  No change proposed.
Avison Young for Crest Nicholson	AGT24-004-02-03	Policy NB6C	Policy NB6C part C1. Refers to 'embodied carbon' but then encourages developers to use the RICS 'Whole Life Carbon Assessment'. This should be amended to clarify the requirements of the policy as embodied carbon and whole life carbon are two different analysis.  The Council proposes in part C2. of the policy that developers must limit embodied carbon to a specific quantum for development over 50 dwellings. It is not clear how the limit of 550 kg CO <sub>2</sub> / m <sup>2</sup> GIA is justified as there is no reference to this figure in the original Bioregional Report. Whilst the Bioregional Addendum Report suggests that achieving embodied carbon limit of 550k CO <sub>2</sub> / m <sup>2</sup> GIA ought to be 'cost-neutral' it does not appear to provide any evidence to back up this statement. Crest is, therefore, concerned that the proposed embodied carbon target is not justified and that there is a risk that the proposed embodied carbon target could impact on the delivery of housing and plan viability.  The Policy is also inflexible (i.e. does not allow for scenarios where achieving the embodied carbon target is not feasible or financially viable). The Policy should be amended to provide flexibility in the event that achieving the proposed standard is not feasible or financially viable.	Yes	No	Not stated	Developers should use the RICS 'Whole Life Carbon Assessment' to measure the embodied carbon element of the development.  The embodied carbon limit '550k CO <sub>2</sub> / m <sup>2</sup> GIA' set within C2 are set to a level thought to be achievable and cost-neutral in that it is at or very close to the level of embodied carbon performance of typical new development built to current Building Regulations standards. This is shown in evidence bases from other emerging local plans (such as South Oxfordshire and the Value of White Horse feasibility and cost evidence), using techniques and products that are commonly available today.  Where the embodied carbon target is not feasible, or financially viable decision makers will be able to take into account site specific considerations through the development management process and apply the appropriate weight in the planning balance.  No change proposed.
Savills UK Ltd for Taylor Wimpey	AGT24-037-05-11	Policy NB6C	We object to NB6C and it is onerous and not justified. Extract from the Ministerial Statement in the full representation. It is considered that the plan should only require development to comply with current or planned building regulations.	Not stated	No	Not stated	The Climate Change Topic Paper 2024 and The Sustainable Construction Policy 2024 documents set out the justification for the policy. The Sustainable Construction Policy Addendum 2024 document sets out how the policy complies with the 13th December 2023 Written Ministerial Statement on energy efficiency standards in local planning.

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							No change proposed.
Pegasus Group for Richborough Estates	AGT24-030-05-02	Policy NB6C	<p>Policy NB6C Clause C2 is considered unnecessary with Building Regulations instead providing the basis on which the construction of buildings should adhere to.</p> <p>Clause 3 in relation to 'easy material re-use and disassembly' and 'end of life demolition' is ambiguous and lacks clarity, placing reliance on further detail within an SPD. The SPD should do no more than clarify the Local Plan policy, and it is suggested that if the requirements for implementing the policy require explanation now, then these should either be included within the Plan Policy or set out within the explanatory text.</p> <p>The requirement for an Energy Statement to accompany applications is referenced only within the supporting text at Paragraph 13.15. To ensure clarity to the reader reference to the provision of an Energy Statement if deemed necessary to deliver the requirements of Policy NB6C should be explicitly set out within the Policy itself rather than an afterthought. The purpose of an Energy Statement at the planning stages is however questioned given the requirements under Building Regulations to meet specific standards of construction in relation to energy efficiency with housebuilders housing portfolios designed to address these requirements.</p>	Yes	No	Yes	<p>The Climate Change Topic Paper 2024 and The Sustainable Construction Policy 2024 documents set out the justification for the policy.</p> <p>Reference to an energy statement in the supporting text is considered appropriate, as this is simply providing guidance to applicants on how to demonstrate compliance with the policy.</p> <p>It is appropriate for an SPD to provide further details of how this element of the policy should be applied.</p>
Savills UK Ltd for Barratt Homes	AGT24-037-01-07	Policy NB6C	We object to NB6C and it is onerous and not justified. Extract from the Ministerial Statement in the full representation. It is considered that the plan should only require development to comply with current or planned building regulations.	Not stated	No	Not stated	The Climate Change Topic Paper 2024 and The Sustainable Construction Policy 2024 documents set out the justification for the policy. The Sustainable Construction Policy Addendum 2024 document sets out how the policy complies with the 13th December 2023 Written Ministerial Statement on energy efficiency standards in local planning.
Historic England	STA24-023-01	Policy NB6C	Heritage assets can be a valuable aid to achieving sustainable development and contributing to reducing carbon emissions. Policy should reference the importance of the historic environment in respect of embodied carbon value of historic buildings and the contribution this can make to reducing carbon emissions.	Not stated	Not stated	Not stated	The purpose of this policy is to set out the requirements for limiting and reporting on embodied carbon. Whilst the historic environment may have a role in limiting embodied carbon, through the reuse of historic buildings in particular, it is not considered necessary to refer to this within the policy.
Pegasus Group for Richborough Estates	AGT24-030-05-02	Policy NB6C	There remains concern over the inclusion of the policy, in particular when read alongside paragraph 13.15. Clause C2 is considered unnecessary with Building Regulations instead providing the basis on which the construction of buildings should adhere to. There should be no expectation placed on housebuilders to exceed national standard which have already been through vigorous viability testing and provide certainty. Clause 3 is ambiguous and lack clarity, placing reliance on	Yes	No	Yes	<p>The Climate Change Topic Paper 2024 and The Sustainable Construction Policy 2024 documents set out the justification for the policy.</p> <p>Reference to an energy statement in the supporting text is considered appropriate, as this is simply providing guidance to applicants on how to demonstrate compliance with the policy.</p>

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			further detail within an SPD. The requirement for an Energy Statement is referenced only within the supporting text, if deemed necessary to deliver the requirements of NB6C it should be explicitly set out within the policy itself. The policy is unsound as it is neither justified not consistent with national policy.				It is appropriate for an SPD to provide further details of how this element of the policy should be applied.
Pegasus Group for Clowes Developments	AGT24-030-02-02	Policy NB6C	There remains concern over the inclusion of the policy, in particular when read alongside paragraph 13.15. Clause C2 is considered unnecessary with Building Regulations instead providing the basis on which the construction of buildings should adhere to. There should be no expectation placed on housebuilders to exceed national standard which have already been through vigorous viability testing and provide certainty. Clause 3 is ambiguous and lack clarity, placing reliance on further detail within an SPD. The requirement for an Energy Statement is referenced only within the supporting text, if deemed necessary to deliver the requirements of NB6C it should be explicitly set out within the policy itself. The policy is unsound as it is neither justified not consistent with national policy.	Not stated	No	No	The Climate Change Topic Paper 2024 and The Sustainable Construction Policy 2024 documents set out the justification for the policy.  Reference to an energy statement in the supporting text is considered appropriate, as this is simply providing guidance to applicants on how to demonstrate compliance with the policy.  It is appropriate for an SPD to provide further details of how this element of the policy should be applied.
Pegasus Group for Miller Homes	AGT24-030-03-13	Policy NB6C	Have provided comments on this policy in Appendix 3. We fully support the Council's objective to address embodied carbon and waste but we are concerned about setting any fixed targets. For soundness, amendments are proposed to the wording of the policy so that: Embodied carbon is reduced only where feasible and viable to do so; Fixed targets for limiting embodied carbon are removed.	Not stated	No	No	The Climate Change Topic Paper 2024 and The Sustainable Construction Policy 2024 documents set out the justification for the policy.  The embodied carbon limit '550k CO2 / m2 GIA' set within C2 are set to a level thought to be achievable and cost-neutral in that it is at or very close to the level of embodied carbon performance of typical new development built to current Building Regulations standards. This is shown in evidence bases from other emerging local plans (such as South Oxfordshire and the Value of White Horse feasibility and cost evidence), using techniques and products that are commonly available today.  Where the embodied carbon target is not feasible, or financially viable decision makers will be able to take into account site specific considerations through the development management process and apply the appropriate weight in the planning balance.  No change proposed.
Pegasus Group for Persimmon Homes	AGT24-030-04-01	Policy NB6C	Persimmon Homes fully appreciates the value of Whole Life-Cycle Carbon Assessments and the need for some post construction, pre-occupation assessment. There remains concerns over the inclusion of the policy, in particular when	Not stated	No	Not stated	The Climate Change Topic Paper 2024 and The Sustainable Construction Policy 2024 documents set out the justification for the policy.



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			read alongside paragraph 13.15. Clause C2 is considered unnecessary with Building Regulations providing the basis on which the construction of buildings should adhere to. There should be no expectation placed on housebuilders to exceed national standards which have already been through vigorous viability testing.				No change proposed.
Pegasus Group for Persimmon Homes	AGT24-030-04-01	Policy NB6C	Clause C3 – the SPD should do no more than clarify the Local Plan policy. The requirement for an Energy Statement is referenced only within the supporting text, if deemed necessary to deliver the requirements of NB6C it should be explicitly set out within the policy itself. The policy is unsound as it is neither justified not consistent with national policy.	Not stated	No	Not stated	It is appropriate for an SPD to provide further details of how this element of the policy should be applied.
Pegasus Group for Taylor Wimpey	AGT24-030-08-02	Policy NB6C	Taylor Wimpey fully appreciates the value of Whole Life-Cycle Carbon Assessments and the need for some post construction, pre-occupation assessment. There remains concerns over the inclusion of the policy, in particular when read alongside paragraph 13.15. Clause C2 is considered unnecessary with Building Regulations providing the basis on which the construction of buildings should adhere to. There should be no expectation placed on housebuilders to exceed national standards which have already been through vigorous viability testing.	Not stated	No	Not stated	The Climate Change Topic Paper 2024 and The Sustainable Construction Policy 2024 documents set out the justification for the policy.  No change proposed.
Pegasus Group for Taylor Wimpey	AGT24-030-08-02	Policy NB6C	Clause C4 raises a number of concerns and is not considered practical in the form proposed, nor is it considered necessary given requirements under Building Regulations. In terms of the introduction of a planning condition requiring verification of embodied carbon quantities, this does not meet with the 6 tests for planning conditions. The requirement for an Energy Statement is referenced only within the supporting text, if deemed necessary to deliver the requirements of NB6C it should be explicitly set out within the policy itself. The policy is unsound as it is neither justified not consistent with national policy.	Not stated	No	Not stated	The Climate Change Topic Paper 2024 and The Sustainable Construction Policy 2024 documents set out the justification for the policy. The implementation of the policy through planning conditions is justified.  Reference to an energy statement in the supporting text is considered appropriate, as this is simply providing guidance to applicants on how to demonstrate compliance with the policy.  No change proposed.
PlanIT Planning & Development for Miller Homes	AGT24-032-04-09	Policy NB6C	We fully support the Council’s objective to address embodied carbon and waste. Whilst we support the Council’s requirement for new developments to be supported by a Whole Life Cycle Assessment, we are concerned about setting any fixed targets. We recommend the policy is updated to reducing embodied carbon where feasible and viable and removing the fixed target to ensure the policy is effective. Proposed updates to the policy can be found in representation 9.	Yes	No	Yes	The Climate Change Topic Paper 2024 and The Sustainable Construction Policy 2024 documents set out the justification for the policy.  The embodied carbon limit ‘550k C02 / m2 GIA’ set within C2 are set to a level thought to be achievable and cost-neutral in that it is at or very close to the level of embodied carbon performance of typical new development built to current Building Regulations standards. This is shown in evidence bases from other emerging local plans (such as South Oxfordshire and the Value of White Horse feasibility and cost evidence), using techniques and products that are commonly

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Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
							available today.  Where the embodied carbon target is not feasible, or financially viable decision makers will be able to take into account site specific considerations through the development management process and apply the appropriate weight in the planning balance.  No change proposed.
National Highways	STA24-032-01	Policy NB6C	National Highways supports the opportunities to meet net zero ambitions, and we welcome the opportunity to work with stakeholders to reduce the impact of carbon emissions on the environment. Sites will be reviewed in the context of the National Highways Net Zero Plan. National Highways also welcomes the inclusion of specific policies within the Plan to directly tackle climate change with initiatives such as NB6C – Embodied Carbon and Waste. We appreciate the effort taken in developing these policies and consider this to be aligned with the expectations set out in the National Planning Policy Framework and National Highways’ Net Zero Strategy.	Not stated	Not stated	Not stated	Comments noted.
<b>POLICY NB7: MANAGING FLOOD RISK, SUSTAINABLE DRAINAGE SYSTEMS AND WATER QUALITY</b>							
Kinver Parish Council	STA24-025-14	Policy NB7	We welcome this policy, while noting that the Flood Zones currently in use may not fully represent the true risk. The statement ‘Discharge should not be made into the combined sewer system’ should be strengthened to ‘must not’.	Not stated	Not stated	Not stated	<b>Minor modification: 046</b>  <b>Discharge should <del>should</del> must not be made into the combined sewer system’</b>
Staffordshire County Council	STA24-044-15	Policy NB7	The acronym SuDS refers to Sustainable Drainage Systems- not Sustainable Urban Drainage Systems. The word ‘Urban’ should be omitted. In Section 2 of Policy NB7: reference should be made to the Drainage Hierarchy that needs to be complied with for all new development.  New development should consider the following methods for surface water discharge in this order. Each should be considered and evidence shall be provided as to why each cannot be achieved, before moving down the hierarchy. 1. Rainwater reuse and harvesting 2. Infiltration – (soakaway-to-ground). 3. Discharge to watercourse or waterbody 4. Discharge to surface water sewer 5. Other (e.g. combined sewer or pumped system).  Also, the four pillars of SuDs should be referenced in this section. Innovative- Blue/Green SuDs such as open basins, swales, treepits and raingardens holistically deliver the four pillars of SuDs:	Yes	No	Yes	<b>Minor modification 044:</b>  <b>Sustainable Urban Drainage Systems</b>  The policy already cross references to the Staffordshire County Council Sustainable Drainage Systems (SuDS) Handbook - February 2017, or subsequent updates, and therefore additional detail in the policy is not considered necessary.

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**CHAPTER 13 & POLICIES NB5-NB7: CLIMATE CHANGE AND SUSTAINABLE DEVELOPMENT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			<ol style="list-style-type: none"> <li>1. Water Quantity (Flood Risk Management)</li> <li>2. Water Quality (Pollution Control)</li> <li>3. Amenity</li> <li>4. Biodiverstiy.</li> </ol> <p>These shall be maximally included and provisioned for in any new development, as far as possible.</p>				
Environment Agency	STA24-019-01	Policy NB7	<p>We are satisfied that all matters in relation to the protection of water quality have been addressed, including SuDs, consideration of sewer capacity and their impact on the environment and phasing of developments. We welcome the submission of additional updated information relating to foul drainage sewer capacity contained within Appendix B of the IDP: Severn Trent Water Sewer Capacity Assessment – September 2022.</p> <p>We note the push for SuDS use within Policy NB7, but recommend it may be pertinent to add in a specific reference within the policy body to ensure discharges are not made into the combined sewer system, within particular consideration or where surface water capacity is flagged within this report as Amber. It should be clear within the policy and its supporting text that early engagement with Severn Trent Water Ltd is imperative to ensuring a sustainably drained development.</p>	Not stated	Not stated	Not stated	<p>Suggested changes have already been made within the 2024 Publication Plan.</p> <p>No change proposed.</p>
Environment Agency	STA24-019-01	Policy NB7	<p>We do recommend however that the following changes (previously advised) are made to the policy to strengthen it and bring it in line with the recommendations sections 10.3 and 10.2 of the 2019 Level 1 SFRA. The policy should state additional wording around:</p> <ul style="list-style-type: none"> <li>- naturalising urban watercourses and open up underground culverts</li> <li>- preventing development from taking place over or within 8m of culverted watercourses</li> <li>- minimising flood risk on the site</li> <li>- providing wider betterment in site specific flood risk assessments</li> </ul> <p>It is imperative that references to 300mm above sea level are changed to 600mm.</p>	Not stated	Not stated	Not stated	<p>The 2024 Plan already incorporates the suggested changes in policy NB7.</p> <p>No change proposed.</p>
RCA Regeneration for Barberrry Developments	AGT24-035-01-02	Policy NB7	We agree with policy NB7 with regards to managing flood risk, and sustainable drainage solutions	No	No	No	Comments noted.
RCA Regeneration for Seven Capital	AGT24-035-03-02	Policy NB7	We agree with policy NB7 with regards to managing flood risk, and sustainable drainage solutions	Not stated	No	No	Comments noted.
RCA Regeneration for Richborough Estates	AGT24-035-02-02	Policy NB7	We agree with policy NB7 with regards to managing flood risk, and sustainable drainage solutions	Not stated	No	No	Comments noted.

**CHAPTER 13 & POLICIES NB5-NB7: CLIMATE CHANGE AND SUSTAINABLE DEVELOPMENT**

<b>Respondent</b>	<b>Opus Ref</b>	<b>Para No.</b>	<b>Summary of Issue Raised</b>	<b>Legally compliant</b>	<b>Sound</b>	<b>Compliant with Duty to Cooperate</b>	<b>Proposed Action/Response</b>
Caven, M	RES24-038-03	Policy NB7	Site 036c- The land concerned is not level and will cause possible drainage problems to the Wildwood estate which is on a much lower level	No	No	No	The site will be subject to a detailed Flood Risk Assessment as part of any future planning application which will ensure that development of the site will not increase flood risk elsewhere.
National Highways	STA24-032-01	Policy NB7	National Highways welcomes the inclusion of specific policies within the Plan to directly tackle climate change with initiatives such as NB7: Managing Flood risk, Sustainable drainage system & water quality. We appreciate the effort taken in developing these policies and consider this to be aligned with the expectations set out in the National Planning Policy Framework and National Highways' Net Zero Strategy.	Not stated	Not stated	Not stated	Comments noted.
Marsh, J	RES24-140-14	Policy NB7	This policy is flagrantly ignored in these plans. Poolhouse Road floods with even the slightest bit of rain. It is a natural dip and there is clearly a drainage issue. An area of flood risk is about 50 metres away from the junction of Bridgnorth Road. Bulldozing the fields removes all the natural drainage, so it can only get worse. When it floods, traffic is down to one lane and causes a traffic issue in the area.	Not stated	Not stated	Not stated	All proposed allocations have been screened by the council against fluvial flood zones to determine unsuitable sites within flood zone 3. Remaining sites have been assessed by the Lead Local Flood Authority (LLFA) to determine sites which presented unmitigable flood risk(s). This process is set out in more detail in the Strategic Flood Risk Assessment and Sequential Test Topic Paper 2024.

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**CHAPTER 14 & POLICIES NB8-NB9: ENHANCING THE HISTORIC ENVIRONMENT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
<b>GENERAL ISSUES: CHAPTER 14 (inc specific paras references)</b>							
							No representations received.
<b>POLICY NB8: PROTECTION AND ENHANCEMENT OF THE HISTORIC ENVIRONMENT AND HERITAGE ASSETS</b>							
Goldfinch Town Planning Services	AGT24-020-01-01	Policy NB8	The historic environment policies are not sufficiently robust as they are supported by a heavily out-of-date and insufficiently robust set of Management Plans/ Conservation Area Character Appraisals. One of the CACA documents is 51 years old since it was last surveyed.	No	No	No	The district council is in the process of updating the Conservation Area Management Plans. Whilst these plans are a valuable tool in supporting the active management of the districts conservation areas the implementation of Policy NB8 is not conditional upon having up to date Conservation Area Management Plans.  No change proposed.
Staffordshire County Council	STA24-044-16	Policy NB8	It is considered that the key evidence outlined under this policy is not comprehensive enough as it is missing some key documents/studies. See below for documents/studies we believe should be included - <ul style="list-style-type: none"> <li>Staffordshire Extensive Urban Survey (see <a href="https://www.staffordshire.gov.uk/environment/Environment-and-countryside/HistoricEnvironment/Extensive-urban-survey-project.aspx">https://www.staffordshire.gov.uk/environment/Environment-and-countryside/HistoricEnvironment/Extensive-urban-survey-project.aspx</a> for more)</li> <li>Cannock Chase AONB Historic Environment Assessment (see <a href="https://www.staffordshire.gov.uk/Environment/Environment-and-Countryside/HistoricEnvironment/Assessments.aspx">https://www.staffordshire.gov.uk/Environment/Environment-and-Countryside/HistoricEnvironment/Assessments.aspx</a> for more)</li> <li>Historic Environment Site Assessment Update 2023 (see <a href="https://www.sstaffs.gov.uk/sites/default/files/2024-04/south_staffs_hesa_add_sites_nov_2023.pdf">https://www.sstaffs.gov.uk/sites/default/files/2024-04/south_staffs_hesa_add_sites_nov_2023.pdf</a>) for more</li> </ul>	Yes	No	Yes	Agreed. Amend the list of key evidence to include the documents identified in the representation.  <b>Minor modification 051: under key evidence under the policy:</b> <ul style="list-style-type: none"> <li>Conservation Area Appraisals and Management Plans 2010</li> <li>Buildings of Special Local Interest</li> <li>Historic Environment Site Assessment 2022</li> <li>Historic Environment Site Assessment Update 2023</li> <li>Historic Environment Character Assessment 2011</li> <li>West Midlands Farmsteads and Landscape Project 2010</li> <li>Staffordshire Extensive Urban Survey</li> <li>Cannock Chase AONB Historic Environment Assessment</li> </ul>
Avison Young for Crest Nicholson	AGT24-004-02-03	Policy NB8	The wording of this policy is inconsistent with that contained in paragraph 206 of the NPPF which specifically talks about any harm or loss to the significance of a designated heritage asset should require clear and convincing justification. As such, the policy should be amended accordingly.	Yes	No	Not stated	<b>Minor modification 049:</b>  Development proposals which would cause harm to, <b>or loss of</b> , the significance of a heritage asset, or its setting, will not be permitted without a clear justification in accordance with legislation and national policy
Historic England	STA24-023-01	Policy NB8	Amend text in second sentence to read 'Development proposals should demonstrate how they conserve and enhance the significance of heritage assets, including their setting'. Details relating to 'character, appearance and function' could then follow on from this.	Not stated	Not stated	Not stated	Agree in part, retain reference conserve or enhance as we wish to retain opportunity to enhance with developments. Sustainable reuse is a valid consideration to aim to promote stable and long term reuse of heritage assets.



**CHAPTER 14 & POLICIES NB8-NB9: ENHANCING THE HISTORIC ENVIRONMENT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			Amend the penultimate paragraph change 'sustainable reuse' to 'appropriate use' and delete the wording in the brackets 'where appropriate' as this inaccurately alters the meaning of the wording.				<p>Minor modification 047 – change wording of first paragraph to read:</p> <p>'The historic environment will be conserved and enhanced, and heritage assets will be protected in a manner appropriate to their significance. Development proposals should demonstrate how they conserve or enhance the character, appearance and function of heritage assets and their settings and respect the significance of heritage assets, including their setting, character, appearance and function.'</p> <p>Minor modification 050: Amend policy to read:</p> <p>'The council will support measures which secure the improved maintenance, management and sustainable <b>and appropriate</b> reuse of heritage assets (where appropriate), particularly those which are identified nationally or locally as being at risk.'</p>
Emery Planning for Wain Estates	AGT24-016-02-01	Policy NB8	<p>Whilst it appears that the Council has attempted to summarise national policy, we are concerned that the wording of the policy (particularly the second paragraph) misconstrues national policy in a way that the local policy could be interpreted differently from the Framework. For example, the reference to development proposals seeking to avoid, and then minimise harm to heritage assets in the first instance is presumably an interpretation of paragraph 201 of the Framework. But it is not clear from the policy as drafted that paragraph 201 of the Framework (read in conjunction with paragraph 18a-008-20190723 of the PPG) is concerned with whether the assessed level of harm to a heritage asset that would be caused by a proposed development could be reduced by alternative designs. The policy as drafted could lead to avoidance being read in a wider context inconsistent with caselaw on the issue.</p> <p>The policy also does not appear to distinguish between designated and non-designated heritage assets. Under national policy and the legislative requirements, a very different approach needs to be taken depending upon whether a heritage asset is designated or non-designated. Therefore, we consider that the policy should simply defer to national policy in relation to proposals affecting heritage assets. On this basis, the policy as drafted is not consistent with national policy and is therefore considered to be unsound having regard to paragraph 35 d) of</p>	Not stated	No	No	<p>Text to be amended to clarify policy purpose.</p> <p>Minor Modification 048: Amend second paragraph of policy to read:</p> <p>'Development proposals should seek to avoid, and then <b>or</b> minimise harm to heritage assets. In the first instance'</p>

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**CHAPTER 14 & POLICIES NB8-NB9: ENHANCING THE HISTORIC ENVIRONMENT**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
			the Framework.				
RCA Regeneration for Barberry Developments	AGT24-035-01-02	Policy NB8	We agree that historic assets must be protected and enhanced, as policy NB8 requires.	No	No	No	Support noted. No change proposed.
RCA Regeneration for Seven Capital	AGT24-035-03-02	Policy NB8	We agree that historic assets must be protected and enhanced, as policy NB8 requires.	Not stated	No	No	Support noted. No change proposed.
RCA Regeneration for Richborough Estates	AGT24-035-02-02	Policy NB8	We agree that historic assets must be protected and enhanced, as policy NB8 requires.	Not stated	No	No	Support noted. No change proposed.
Brewood Civic Society	STA24-008-09	Policy NB8	Brewood Civic Society supports Policy NB8: Protection and enhancement of the historic environment and heritage assets. Conservation Areas are important to protecting the character of our historic villages. Regular updates of the management plans are essential in monitoring the continual erosion of the local character.	Not stated	Not stated	Not stated	Support noted. No change proposed.
<b>POLICY NB9: CANAL NETWORK</b>							
							No representations received.

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**CHAPTER 15: MONITORING THE PLAN**

Respondent	Opus Ref	Para No.	Summary of Issue Raised	Legally compliant	Sound	Compliant with Duty to Cooperate	Proposed Action/Response
<b>GENERAL ISSUES: CHAPTER 15 (inc specific paras references)</b>							
Home Builders Federation	STA24-024-02	15.1	<p>The monitoring framework in the Plan is unsound because it is not positively prepared, is not effective or justified, and does not comply with national policy.</p> <p>In light of the failure of this plan to properly address the issue of unmet need and the wider role South Staffordshire should play in meeting the housing needs of the wider West Midlands region, and the economic impacts of not doing so, HBF would request that this plan is subject to an early review policy. This will be essential to ensure that the Plan delivers the housing needed and action is taken to address the unmet needs of the wider HMA as soon as possible.</p>	No	No	No	It is not considered necessary to specifically commit to an early review of the plan as a review of the plan to ensure it is kept up to date is already a requirement of national guidance.
Pegasus Group for BDW Trading Ltd	AGT24-030-01-11	Monitoring Framework	As noted under our comments to Policy DS4 there must be a policy commitment within the Local Plan to undertake this monitoring in light of the fact that it is no longer a legal requirement for Council's to undertake this. The plans also says that the monitoring framework will play an integral role in providing an understanding of whether a review of the Local Plan is needed. However, there is a notable omission of any trigger points within the monitoring framework that would prompt the requirement for a Local Plan review. As such, we do consider that the monitoring framework will be ineffective. To address this, the monitoring framework needs to include trigger points for a review of the Local Plan, for example, if housing delivery falls below a certain level.	Not stated	No	Not stated	The monitoring framework includes targets, and performance against those will inform when a review is required. However, the decision to review the plan will be based on more than performance against the monitoring framework measures, such as changes to national policy.
Pegasus Group for Miller Homes	AGT24-030-03-15	Monitoring Framework	We agree that the principal mechanism for monitoring should be the AMR. However, we urge these to be updated in a timely and consistent format each year to allow for effective monitoring and the ability to notice trends in certain areas. There must be a commitment within the Local Plan to undertake this monitoring in light of the fact that it is no longer a legal requirement to do so. There is a notable omission of any trigger points within the monitoring framework that would prompt the requirement for a Local Plan review. As such, we consider the monitoring framework will be ineffective.	Not stated	No	No	The monitoring framework includes targets, and performance against those will inform when a review is required. However, the decision to review the plan will be based on more than performance against the monitoring framework measures, such as changes to national policy.