

**Summary paper:**  
**How Regulation 18 consultation informed the submitted South  
Staffordshire Regulation 19 Local Plan**

1. This paper provides details of how Regulation 18 consultation stage responses have informed the submitted Local Plan. This information is not currently set out in a single document, but is spread throughout a number of documents in the examination library. This summary note draws these together to set out how the plan evolved in response to Regulation 18 consultation representations.
2. Following the Council's 2022 Regulation 19 consultation (ref [PC1](#)), the Council paused plan preparation in January 2023, in order to consider proposed changes to the NPPF (consulted on in December 2022), and as a result revised its plan ahead of a second Regulation 19 consultation (ref [CD1](#)) in April 2024. As part of the process for determining the April 2024 Regulation 19 plan, representations from the 2021 Preferred Options (ref [PC2](#)) consultation were again reviewed. Equally, the spatial options consulted on at an earlier Regulation 18 stage (Spatial Housing Strategy and Infrastructure Delivery (SHSID)) (ref [PC3](#)) consultation were also revisited, with an additional two spatial options tested (Options H and I), as set out in the Spatial Strategy Topic Paper 2024 (ref [EB14](#)). Whilst all representations from all stages of public consultation were carefully considered, only changes were made to the emerging plan to reflect these where the Council felt it was justified to do so.
3. The remainder of this paper draws together the key issues raised from the 2021 Regulation 18 Preferred Options consultation (ref [PC2](#)) by the topic that related to the 12 questions asked through that consultation. The key issues raised under each question are then broken down by residents, developers and planning agents, and statutory bodies and other stakeholders. An explanation of how these issues were considered and informed the submission Local Plan follows.

### **Question 1 – Evidence Base**

#### Residents – key issues raised

- Duty to Cooperate is not a duty to agree
- Housing numbers are based on out-of-date evidence and therefore the contribution of 4000 homes towards unmet needs is too high
- Exceptional circumstances for release of Green Belt have not been met
- Brownfield sites available in West Midlands to meet development needs
- Concerns about transport/highways and travel
- Lack of facilities and services to support proposed level of growth
- Disagree with tier level of some villages

#### How these responses informed the submitted Regulation 19 plan

4. The tension in the Regulation 18 representations between residents seeking lower levels of housing growth in order to protect the Green Belt, and developers' representations seeking higher levels of growth (see below) resulted in the Council progressing **a level of housing growth that was considered the minimum possible Green Belt release achievable while still having an appropriate and sound strategy**. This resulted in a strategy of meeting our own needs plus a 4000 home contribution to Greater Birmingham and Black Country Housing Market Area (GBBCHMA) unmet needs in the 2022 Regulation 19 Plan (ref [PC1](#)). However, following the consultation on changes to the NPPF in December 2022, that were subsequently introduced in December 2023, this NPPF (para 145) clarified that it was in authorities' gift to choose to release Green Belt where they could demonstrate exceptional circumstances. The Council considered that this clarification in national policy meant that the level of housing growth in the 2022 Publication Plan should be revisited in order to further respond to residents concerns and achieve the objective of minimising Green Belt release and having a sound strategy. Concerns about the age of the Strategic Growth Study 2018 (ref [EB28](#)) was also a consideration in revising the Council's proposed quantum and distribution of housing growth in the submitted plan. It was considered that the pause to plan preparation in January 2023, and the need to extend the plan period resulting from this, meant that concerns about the age of the study were now valid, as set out in paragraph 5.12 of the submitted plan (ref [CD1](#)).
5. The Council did consider a strategy of no Green Belt release when revising its housing requirement. However, there was uncertainty on how housing developments' impact on first school places could be mitigated (including development from safeguarded land in Codsall/Bilbrook), without an increase in development on Green Belt sites at these villages in order to generate sufficient pupils to make a new school operationally viable. The housing requirement in the submitted plan is therefore considered to be an appropriate response to the Regulation 18 consultation responses; it is the level of growth that represents the minimum possible Green Belt release achievable while still having what the Council consider an appropriate and sound strategy, in line with changes to national policy.
6. By focusing a higher proportion of growth at the district's most sustainable Tier 1 settlements, the revised strategy also in part reflects concerns raised at Regulation 18 stage (ref [PC2](#)) about the impact on local infrastructure, including public transport and highways. Essentially, by directing a higher proportion of growth to the most sustainable Tier 1 settlements which have the most comprehensive level of infrastructure (including commuter railway stations) in the district, it is considered that the submitted plan responds to these concerns. This is because these settlements are best placed to see upgrades to existing infrastructure, compared to less sustainable locations that are more likely to require wholly new infrastructure to be delivered.
7. Residents' concerns in relation to infrastructure capacity have been a consistent theme raised throughout plan preparation, with impact on highways/transport,

education and health facilities most commonly cited. Therefore, in the submitted plan, the Council has also sought to include strong policies to ensure that contributions towards infrastructure improvements are secured, where necessary, including through policies HC14, HC15, EC11 and EC12.

8. Mindful of some representors' views that exceptional circumstances for Green Belt release had not been met, subsequent to the 2021 Regulation 18 consultation, a Green Belt Exceptional Circumstances Topic Paper (ref [EB16](#)) was produced to sit alongside the 2024 Regulation 19 Publication Plan. This sets out that the Council considers there is both a strategic and site-specific case for the Green Belt amendments proposed through the plan.
9. Taking on board many residents' concerns that there was considerable underutilised brownfield land in the Black Country (that could reduce or preclude Green Belt release through the plan), following the 2021 Regulation 18 consultation, the Council has continued to engage with the Black Country authorities. Through responses to their emerging plans' consultations, we have continued to request that they maximise delivery of housing within their own administrative boundaries before seeking to export their unmet needs. This is summarised in Appendix E of the Duty to Cooperate Topic Paper 2024 (ref [DC2](#)).
10. Whilst it is acknowledged that a number of representors expressed concerns about the tier level attributed to some villages, on reflection, the Council still considered that the proposed settlement hierarchy was appropriate, and that the Rural Services and Facilities Audit 2021 (ref [EB15](#)), as the evidential basis for it, remained valid. Having taken this view, the settlement hierarchy proposed at Regulation 18 consultation stage was carried forward to the 2022 Regulation 19 plan and the submitted plan.

#### Developers and planning agents – key issues raised

- Joint working has taken place under Duty to Cooperate; needs to be evidenced through Statements of Common Ground
- Evidence base should be expanded
- Contrary to NPPF
- Housing numbers are too low and should be revisited and Strategic Growth Study 2018 should be updated
- Employment studies should be updated
- Support for use of previously safeguarded land for development
- Promotion of alternative/additional sites to meet development needs

#### How these responses informed the submitted Regulation 19 plan

11. Following the Preferred Options Regulation 18 (ref [PC2](#)) consultation in 2021, the Council reflected on representations arguing that the evidence base should be expanded and prepared numerous additional evidence base documents ahead of submission of the plan, to ensure that evidence to support the Local Plan was up

to date and had the necessary coverage. A number of evidence base documents were updated prior to the 2022 Regulation 19 Publication Plan (ref [PC1](#)), and again prior to the 2024 Publication Plan (ref [CD1](#)), particularly where these involved a needs assessment, to ensure that the evidence base was up to date. Examples of this include: Economic Development Needs Assessment (ref [EB44](#), [EB45](#)); Housing Market Assessment (ref [EB26](#), [EB27](#)); Gypsy and Traveller Accommodation Assessment (ref [EB34](#)); and Strategic Flood Risk Assessment Level 2 (ref [EB64](#)). In addition, the evidence base was expanded between Regulation 18 and submission of the plan through the introduction of numerous supporting topic papers, including relating to housing density, affordable housing and housing mix and homes for older and disabled people. In several cases, topic papers were prepared in response to representor critique at the Regulation 18 stage. For example, the Internal Space Standards Topic Paper (ref [EB24](#)), responding to some representor views that the proposal to require adherence to the National Described Space Standards had not been evidenced.

12. Many representors from the development industry felt that the number of homes the Council was proposing should be increased, including an increased contribution towards cross boundary unmet needs. As detailed in paragraphs 4 and 5 of this paper, these concerns were considered against resident concerns about the level of housing growth being proposed, alongside changes to national policy following the 2022 Regulation 19 consultation, to arrive at a revised level of housing growth that the Council believes balances these competing considerations. Equally, as set out in paragraph 4 of this paper, it is now agreed with representors expressing concerns about the age of the 2018 Strategic Growth Study.
13. Numerous representors from the development industry also felt that more evidence was needed to demonstrate compliance with the Duty to Cooperate, including through Statements of Common Ground. In response to this, a Duty to Cooperate Topic Paper (ref [DC2](#)) was prepared detailing how the Duty has been complied with, alongside a suite of Statements of Common Ground (ref [DC3-DC20](#)) that reflect the ongoing engagement undertaken, and the respective positions, of neighbouring authorities.
14. Representor concerns at Regulation 18 consultation stage that elements of the plan were contrary to the NPPF was mitigated through the Council undertaking a soundness self assessment (ref [CD12](#)) prior to submission of the plan to ensure conformity.

#### Statutory bodies and other stakeholders – key issues raised

- Some Parish Councils and some District Councillors did not support the 4000 home contribution to the GBBCHMA and felt that Green Belt should be protected. They considered that the development of suitable brownfield land should be maximised both in South Staffordshire and adjoining areas. They also raised concerns including highways, flooding and ecology. It was also

expressed that the Council should use the Duty to Co-operate mechanism to ask other local authorities to meet shortfalls in Gypsy, Traveller, and Travelling Showpeople pitches. Some Councillors raised concerns relating to the allocation site 036c south of Stafford, and the engagement undertaken with Stafford Borough Council.

- There was general support from neighbouring authorities for the 4000 home contribution to the GBBCHMA as well as the contribution of employment land to meet unmet needs, but with a request that contributions were provided to the Black Country. There were requests for future EDNA updates to have regard to the West Midlands Interchange Apportionment Study (ref [EB49](#)) and West Midlands Strategic Employment Sites Study (ref [EB47](#)). It was also noted that housing growth would need to address Cannock Chase SAC mitigation measures.
- Staffordshire County Council requested that a number of additional documents be added to the evidence base. The Environment Agency highlighted where a number of other documents / studies have been updated.
- Natural England stated that in-combination effects of the impact on designated habitat sites from air quality will need to be assessed. They also queried the council's justification for allocating on the Best and Most Versatile Agricultural Land.
- Sport England welcomed the Council having undertaken a Playing Pitch Strategy and Indoor Sports Strategy. They encouraged an annual review of the Playing Pitch Strategy.
- Historic England stated that the evidence base needed strengthening and a link needed to be made between evidence base recommendations and policy text.
- Request that any sites being considered for allocation to be assessed against mining data provided.

#### How these responses informed the submitted Regulation 19 plan

15. As would be expected, concerns from Parish Councils and district councillors often reflected those of their residents they represented. As detailed in paragraphs 4 and 5 of this paper, concerns from parish councils and residents about the proposed contribution to unmet housing needs of neighbouring authorities were considered alongside development industry representations arguing for higher levels of growth when revising the preferred strategy. As detailed in paragraph 9 of this paper, following the Regulation 18 stage the Council continued to push for neighbouring urban authorities to maximise brownfield land delivery in their urban area. Equally, the council ensured that all potentially suitable brownfield land sites in the district were assessed through the Strategic Housing and Economic Land Availability Assessment (ref [EB19](#)) and Housing Site Assessment Topic Paper 2024 (ref [EB20](#)). Following this assessment all suitable brownfield sites were allocated.
16. Engagement with Stafford Borough Council has been undertaken throughout plan preparation, as well as engagement with key infrastructure authorities such as the

education authority and local highways authority as detailed in the Duty to Cooperate Topic Paper 2024 (ref [DC2](#)).

17. The council agreed with representations that it was important to continue to make requests to neighbouring authorities to assist with South Staffordshire's unmet needs for Gypsy and Traveller pitches. Following Regulation 18 stage, this has continued with several letters sent to neighbouring authorities requesting assistance with our unmet needs, as well as through responses to neighbouring authorities Local Plan consultations, as detailed in our Gypsy and Traveller Topic Paper (ref [EB33](#)) and Duty to Cooperate Topic Paper 2024 (ref [DC2](#)).
18. The Council took on board representations requesting that the updated Economic Development Needs Assessment (EDNA) have regard to the West Midlands Interchange Apportionment Study and West Midlands Strategic Employment Sites Study. These were both considered through the updated EDNA (ref [EB44](#), [EB45](#)).
19. Representations from the Black Country authorities requesting the entire housing contribution (4000 homes proposed at Regulation 18 stage) be provided to the Black Country were carefully considered. However, it remained the view that the GBBCHMA represented the most appropriate functional geography to consider this issue, and as the shortfall originates from wider than just the Black Country, it was considered that providing the contribution to the GBBCHMA remained an appropriate approach. It is considered that even with the reduced contribution in the submitted plan (640 homes) that this remains the case, and subsequent to submission of the Local Plan, a further Statement of Common Ground (SoCG) across the HMA has now been agreed (subject to signing) that apportions our 640 home contribution between the five authorities with a shortfall.
20. It was recognised that air quality impacts on designated habitats sites needed to be considered following the Regulation 18 stage, and that this needed to be done on a cross-boundary basis to consider in-combination effects. An air quality evidence base (ref [EB10](#)) was therefore prepared in advance of submission of the South Staffordshire Local Plan. This was subsequently agreed through the submission version of the Habitats Regulations Assessment (ref [EB8](#)) and the cross boundary Statement of Common Ground (ref [SST/ED4](#)) which confirms that adverse effects on the integrity of designated habitat sites could now be ruled out. The Council's consideration of Best and Most Versatile Agricultural Land when devising its preferred spatial strategy is set out in paragraph 3.28 of the Housing Site Selection Topic Paper (ref [EB20](#)).
21. As suggested by Sports England in their Regulation 18 response, the Council has undertaken annual reviews of the Playing Pitch Strategy and Action Plan since 2023 (ref [EB68](#), [EB69](#)).
22. Following the Regulation 18 consultation, the Historic Environment Site Assessment (HESA) (ref [EB75](#)) was updated, with Stage 2 assessments undertaken for allocation sites involving detailed survey work. Relevant

recommendations from the HESA were then referenced in the site-specific proformas for allocations in the submitted plan. Mining constraints have also been considered as part of the site selection process.

## **Question 2 - Infrastructure**

### Residents – key issues raised

- Impact on facilities and services in villages proposed for housing growth, including schools and health facilities
- Impact on transport network; lack of public transport
- More information required about green infrastructure

### How these responses informed the submitted Regulation 19 plan

23. A considerable proportion of residents' representations to the 2021 Regulation 18 Preferred Options (ref [PC2](#)) raised concerns about the impact of housing growth on local infrastructure and existing services and facilities. As detailed in paragraph 6 and 7 of this paper, the submitted plan responds to these representations by having a spatial strategy that distributes growth predominantly to the district's most sustainable Tier 1 settlements with the most comprehensive existing infrastructure; as well as by having policies that will secure mitigation to local infrastructure where required.
24. Following representations citing that the Local Plan required more on green infrastructure requirements, the submitted plan includes Policy HC19 that specifically seeks to strengthen and promote a connected green infrastructure network. Policy HC17 has been developed to ensure existing public open space is not lost and that new provision is provided through new developments in line with the recommendations of the Open Space Strategy and Audit 2019 (ref [EB73](#)). Equally, the policies to deliver our strategic housing allocations (Policy MA1, SA1, SA2) were developed following the Regulation 18 stage to ensure that strong green infrastructure were central to the sites' concept and vision and based on a Green Infrastructure Framework (required under Policy MA1).

### Developers and planning agents – key issues raised

- Development level too low and therefore the Infrastructure Delivery Plan (IDP) does not cover necessary infrastructure to support higher level of growth
- IDP is insufficient

### How these responses informed the submitted Regulation 19 plan

25. The Council's IDP was updated following the 2021 Regulation 18 Preferred Options (ref [PC2](#)) consultation. The submitted IDP is a 'live document' and therefore will be periodically updated when more detailed information (e.g specific costs) relating to proposed infrastructure are known. The submitted IDP

(ref CD11) confirms at paragraph 5.2 that the strategy “reflects the desire to see development in places where capacity exists to deliver growth without placing a strain on existing infrastructure, and where possible also deliver new infrastructure benefits”. The submitted IDP includes the necessary infrastructure commensurate with this strategy. This includes the infrastructure that must be delivered alongside the proposed site allocations.

#### Statutory bodies and other stakeholders – key issues raised

- Parish Councils raised general infrastructure concerns and concerns in relation to specific sites on topics including: highways, sustainable transport, the delivery of infrastructure, schools, health and green spaces.
- Neighbouring authorities were supportive of the promotion of the Brinsford Strategic Park and Ride. They also considered that developments should minimise trip generation and have good access to the rail network and link effectively to the strategic transport network. They also commented on the infrastructure requirements and delivery on Cross Green and Linthouse Lane strategic allocations. Initial indications from early modelling are that potential impacts on Wolverhampton highways can be mitigated.
- Staffordshire County Council will provide information on minimum school costs, land takes and indicative triggers for new school provision.
- Environment Agency requested reassurance that combined sewer overflows and storage will be upgraded where necessary to prevent new development causing increase in storm water spill frequency, duration and volume. Severn Trent Water stated that for new development they would not expect surface water to be conveyed to foul or combined sewage systems. The ability to support significant development in the rural areas is likely to have a greater impact and require greater reinforcement to accommodate greater demands on water supply.

#### How these responses informed the submitted Regulation 19 plan

26. As detailed in paragraph 7 of this paper, resident concerns about infrastructure have been a recurring theme throughout plan preparation, and these have often mirrored concerns from Parish Councils and District Councillors. In response to this, the submitted plan includes specific policies on transport, education, health, sports facilities, open space etc to ensure the infrastructure required to support new developments is delivered.
27. Support from some stakeholders for the Brinsford Park and Ride expressed at Regulation 18 stage was noted. However prior to submission of the Local Plan, further work on the station’s feasibility through the West Midlands Combined Authority (WMCA) New Stations Assessment (ref EB85) concluded that bus enhancements are likely to represent a better short to medium term solution. This, combined with the revised strategy of limiting Green Belt release to Tier 1 settlements, meant that it was not considered appropriate to safeguard land for a Park and Ride through the Local Plan. Notwithstanding this, in line with the



WMCA's report recommendation to keep consideration of the Park and Ride under review and the stakeholder support, the Council intends to revisit its feasibility in future Local Plan reviews, and therefore maintains in the submitted IDP that Brinsford Park and Ride remains a longer term aspiration.

28. The strategic sites at Linthouse Lane and Cross Green were removed from the plan following the pause to plan preparation in January 2023. The revised strategy seeks to focus growth on the district's most sustainable Tier 1 settlements, whilst maximising suitable non-Green Belt site options. It is therefore considered that the submitted plan aligns with neighbouring authority representations seeking that developments minimise trip generation and have good access to the rail network and Strategic Road Network.
29. The information provided by Staffordshire County Council on school building costs was factored into the stage 2 viability study (ref [EB40](#)) . The information on land take is reflected in policies SA1 and SA2 for the strategic sites where new school provision is to be provided.
30. The detailed comments provided by the Environment Agency and Severn Trent Water to the Preferred Options were taken on board in the final submitted version of Policy NB7, including confirming that discharge should not be made into the combined sewer system.

### **Question 3 – Strategic vision and policy direction**

#### Residents – key issues raised

- Provision of additional 4000 homes for wider unmet needs not supported
- Contribution to unmet need not proportionate
- Development should be directed to brownfield land in the West Midlands
- Objectives should take account of empty properties
- Climate change impacts should be a higher priority

#### How these responses informed the submitted Regulation 19 plan

31. As detailed in paragraphs 4 and 5 of the paper, concerns from residents about the proposed contribution to unmet housing needs of neighbouring authorities were considered alongside development industry representations arguing for higher levels of growth when revising the preferred strategy.
32. As detailed in paragraph 9 of this paper, following the Regulation 18 stage the Council has continued to push for neighbouring urban authorities to maximise brownfield land delivery in their urban area.
33. The Council does have a relatively small number of empty properties and has a separate corporate strategy in place to bring these back into use. Whilst theoretically bringing empty properties back into use could lead to fewer new

homes being needed elsewhere, it is not possible to quantify this, and any impact would likely be minimal. It was therefore not considered appropriate for the strategic objectives in the plan to take account of empty properties.

34. Reflecting on resident representations that climate change impacts should be a higher priority in the plan, the submitted plan more clearly articulates the role of the Local Plan in tackling climate change (see paragraphs 1.7-1.9) than the Regulation 18 Preferred Options version. Equally, Policy NB6 is extended in the submitted plan (to Policies NB6A, NB6B and NB6C) to reflect a more ambitious approach to sustainable construction, ensuring that the Local Plan meets its legal duty to deliver carbon reduction through the planning process, in line with the Climate Change Act 2008. Evidence was prepared prior to the 2024 Regulation 19 consultation to justify the proposed approach in these policies (ref [EB61](#) and [EB61a](#)).

#### Developers and planning agents – key issues raised

- Insufficient quantum of development being proposed
- Support for retention of employment sites and to foster economic growth
- More clarity required, e.g. reference to ‘key villages’ is too vague
- Vision and strategic objectives need to be more spatially specific
- Plan period should be extended or aligned with other plans

#### How these responses informed the submitted Regulation 19 plan

35. Representations suggesting that some of the strategic objectives were too vague and required greater clarity were reflected on prior to finalising the strategic objectives in the submitted plan. For Strategic Objective 2, it was agreed that reference to ‘key villages’ had not been defined so this reference was removed. As Strategic Objective 2 tied to the overall development strategy, reference was added to meeting our employment needs, including making a proportionate contribution to the wider South Staffordshire Functional Economic Market Area (FEMA). Equally it was considered important that clarity be provided under Strategic Objective 3 that providing homes for the needs of different groups also includes the gypsy and traveller community.
36. Having considered some representations stating that the strategic objectives needed to be more spatially specific, it was the Council’s view that this was not necessary, due to the overarching nature of these. In the submitted plan at paragraph 4.2, the links between the plan’s vision, strategic objectives and policies was clarified, confirming that the plan’s policies are the means of achieving the vision and objectives through the development management process. It is therefore the plan’s policies (e.g Policy DS5 – The Spatial Strategy to 2041 and site allocations policies) that detail how the vision and strategic objectives will be delivered spatially.

37. Representations at the Preferred Options Regulation 18 consultation requesting that the plan period be extended were taken on board, firstly through extending the end date of the plan period from 2038 to 2039 in the 2022 Regulation 19 plan. Following the pause to the plan in January 2023 and the resultant need to undertake a second Regulation 19 consultation, the end date for the plan was revisited for the 2024 Regulation 19 consultation. It is considered that the end date in the submitted plan of 2041 should be sufficient to ensure that the plan period covers 15 years post adoption.

#### Statutory bodies and other stakeholders – key issues raised

- There was a mix of objection and limited support from Parish Councils and a local action group to the strategic objectives, with particular concern with Strategic Objective 2 in relation to the 4000 homes contribution to wider unmet needs. They considered that Strategic Objective 12 should be much higher priority and that development locations should seek to reduce climate change emissions.
- Black Country authorities requested that the opportunity to make a contribution to wider unmet employment land needs was reflected under the economic vibrancy section of the strategic objectives.
- Staffordshire County Council considered that climate change mitigation and adaptation should be reflected in the vision, and support for Brinsford Park and Ride referenced.
- Vision and objectives should address impacts/opportunities for natural environment and set out environmental ambition; enhancing ecological networks and the water environment should be reflected in the vision and strategic objectives.
- Welcome reference to heritage but Strategic Objective 13 should also refer to historic landscapes, rather than just the built element of the historic environment.

#### How these responses informed the submitted Regulation 19 plan

38. As would be expected, concerns from Parish Councils and District councillors often reflected those of their residents they represented. As detailed in paragraphs 4 and 5 of this paper, these concerns were considered against developer concerns about the level of housing growth being proposed, alongside changes to national policy following the 2022 Regulation 19 consultation, to arrive at a revised level of housing growth that the Council believes balances these competing considerations. Concerns about the impact of development on climate change was a consideration when reviewing the preferred spatial strategy and including a greater proportion of development to Tier 1 settlements with the greatest choice of sustainable transport modes.
39. The Council agreed with the request from the Black Country authorities for Strategic Objective 2 to reference the opportunity to contribute towards unmet employment needs of neighbouring areas, and not just housing. Strategic

Objective 2 of the submitted plan therefore specifically includes reference to making a proportionate contribution to unmet needs of the wider Functional Economic Market Area (FEMA).

40. The Council agreed with Staffordshire County Council that addressing the climate emergency needed to be reflected in the vision, with the vision amended accordingly for the Regulation 19 consultation stage. As set out in paragraph 27 of this paper, whilst Brinsford Park and Ride remains a longer-term aspiration in the IDP, given uncertainty on its delivery, referencing support for it in the Local Plan was no longer considered appropriate.
41. Reflecting on representations suggesting that the vision and objectives should provide more detail on impact/opportunities for the natural environment, it was considered that no further detail was required, as Strategic Objective 11 already confirms that protection and enhancement of the natural environment is a key objective of the plan. Further detail is provided through the policies that will ultimately deliver the vision and strategic objectives, as set out in paragraph 4.2 of the submitted Local Plan. Equally, it was not considered that historic landscapes needed to be referenced in Strategic Objective 13 as protecting and enhancing landscape character is already referenced in Strategic Objective 11, and conserving and enhancing the district's Historic Landscape Areas (HLAs) is required under Policy NB4.

#### **Question 4 – Green Belt and Open Countryside**

##### Residents – key issues raised

- Brownfield land in the conurbation should be developed first
- Inconsistency with NPPF, exceptional circumstances for Green Belt release not proven
- Green Belt Supplementary Planning Document (SPD) required
- Green Belt should not be built on

##### How these responses informed the submitted Regulation 19 plan

42. As set out in paragraph 9 of this paper, the Council has been mindful of residents' concerns that brownfield land in the West Midlands conurbation was not being fully utilised and have continued to push for neighbouring urban authorities to maximise brownfield land delivery in their urban area.
43. As confirmed in paragraph 8 of this paper, Regulation 18 representations stating that exceptional circumstances were not proven were addressed through the production of the Exceptional Circumstances Topic Paper 2024 (ref [EB16](#)).
44. As detailed in paragraphs 4 and 5 of this paper, concerns from residents about Green Belt land being built on were considered alongside development industry

representations arguing for higher levels of growth when revising the preferred strategy.

45. It was agreed that a Green Belt SPD would be of assistance and the intention to produce one is referenced in Policy DS1 of the submitted plan.

#### Developer and planning agents – key issues raised

- Support for land removed from the Green Belt for development needs, but insufficient for realistic growth and long-term needs
- Policy DS2 (Policy DS3: Open Countryside in submitted plan) is unduly restrictive, should not give same level of protection as DS1
- Support from development industry for sites to be removed from the Green Belt in the plan; objections to omission sites

#### How these responses informed the submitted Regulation 19 plan

46. As detailed in paragraphs 4 and 5 of the paper, developer representations calling for further Green Belt release were considered alongside concerns from residents at the amount of Green Belt land being proposed for development when revising the preferred strategy.
47. The Council reflected on representations that Policy DS2 (Policy DS3 – Open Countryside' in the submitted plan) was providing the same level of protection as our Green Belt policy (Policy DS1) and was therefore too restrictive, but disagreed with this view. The submitted Policy DS3 does not seek to blanket protect the Open Countryside for its own sake. Instead, the policy is explicit on the types of development proposed that are in principle supported, whilst confirming that other types of developments will be considered where consistent with other policy areas listed in the policy. The Council considers this is consistent with the NPPF.
48. Proposed allocations and omission sites were assessed on a consistent basis through the Housing Site Assessment Topic Paper 2024 (ref [EB20](#)), Economic Strategy and Employment Site Assessment Topic Paper (ref [EB42](#)), and Gypsy and Traveller Topic Paper (ref [EB33](#)), as well as through the Sustainability Appraisal process (ref EB1-EB7). These site assessments are informed by a wider evidence base (e.g Green Belt Assessment, Historic Environment Site Assessment) and therefore the Council consider the site selection process to be appropriate. However, where factual errors were identified through representations (e.g site size) then these were rectified through updates to the site selection topic papers.

#### Statutory bodies and other stakeholders – key issues raised

- General support from some Parish Councils for the approach in Policy DS1 to protecting the Green Belt, but objections to allocating Green Belt sites; view expressed that Open Countryside land is no less valuable than Green Belt.

- Agreement from neighbouring authorities that exceptional circumstances exist to merit Green Belt release
- Policies could consider well designed tree and woodland planting, opportunities to link into green infrastructure and ecological networks, and improvements to active travel routes as opportunities to enhance the beneficial use of Green Belt and the Open Countryside.
- Historic England recommended amending ‘historic assets’ to ‘heritage assets’ to reflect the NPPF.
- Cannock Chase AONB unit supported additional wording under the Open Countryside policy (Policy DS3 in submitted plan) to recognise the sensitivities of Cannock Chase AONB and its setting

#### How these responses informed the submitted Regulation 19 plan

49. As set out in paragraph 4 and 5 of this paper, Parish Council and resident concerns about the proposed level of Green Belt release were considered alongside developer representations requesting higher levels of Green Belt release when revising the plans spatial strategy and quantum of growth. Whilst Parish Council concerns about the protection of the Open Countryside were acknowledged, the NPPF is clear that non-Green Belt land (including land designated ‘Open Countryside’) should be examined fully in order to demonstrate exceptional circumstances to justify changing Green Belt boundaries. There is no national policy basis for affording Open Countryside the same level of protection as Green Belt.
50. Representations citing other potential beneficial uses of the Green Belt were noted, however the opportunities referenced in Policy DS1 were not intended to be an exhaustive list. Policy DS2 in the submitted plan setting out the requirements for Green Belt compensatory measures, includes compensatory improvements to environmental quality and accessibility of remaining Green Belt, which could include linking green infrastructure networks, additional planting and new active travel routes being established.
51. Reference was changed to ‘heritage assets’ in the submitted plan as suggested.
52. The request for additional wording under the Open Countryside policy (DS3 in the submitted plan) was considered; however it was felt that reference to ‘landscape character and assets’ as a factor to be considered provided a sufficient hook, alongside national policy, for considering Cannock Chase AONB and its setting.

#### **Question 5 – Spatial Strategy**

##### Residents – key issues raised

- The vast majority felt that South Staffordshire should not have to meet other authorities’ housing needs, and the housing requirement was excessive.

- They considered that there were considerable brownfield opportunities, particularly in the Black Country, and therefore Green Belt development should be avoided when determining the housing requirement for the plan.
- Some felt that the housing requirement has not taken account of updated data and the effects of Covid.
- Many raised concerns that the level and distribution of development proposed would have a negative impact on the environment, air quality, flooding and climate change.
- Concerns that villages in South Staffordshire could not cope with additional development proposed, particularly the impact on local infrastructure including highways, education and health facilities.
- Some residents of the district's larger settlements felt that development should be distributed more evenly and directed to lower tier settlements, with some representors objecting to the proposed settlement hierarchy.
- Some support for development being directed to a new settlement to relieve pressure on villages.

#### How these responses informed the submitted Regulation 19 plan

53. As set out in paragraphs 4 and 5 of this paper, concerns from residents about Green Belt land being built on were considered alongside development industry representations arguing for higher levels of growth when revising the preferred strategy.
54. As set out in paragraph 9 of this paper, the Council has been mindful of residents' concerns that brownfield land in the West Midlands conurbation was not being fully utilised and has continued to push for neighbouring urban authorities to maximise brownfield land delivery in their urban area.
55. As detailed at paragraph 7, resident concerns regarding the impact on local infrastructure were taken on board following the Regulation 18 Preferred Options consultation and influenced strengthened policies to mitigate and/or improvements to local infrastructure.
56. In order to address representor concerns relating to data that informs the housing requirement not being up to date, prior to publication of the April 2024 Publication Plan a partial Housing Market Assessment update (ref [EB26](#)) was undertaken. This reflected updated data, including the latest (at that time) Standard Method requirement of 227 dwellings per annum.
57. Representations expressing concerns that the level and distribution of growth would have a negative effect on the environment were considered when determining the site selection factors in the Housing Site Assessment Topic Paper (ref [EB20](#)), and by directing development away from more sensitive areas. Climate change and wider sustainability concerns were also a factor in the revised strategy in the 2024 Publication Plan. By focusing development largely in the most sustainable Tier 1 settlements where there are more sustainable transport modes

available and therefore greater scope for reducing private car journeys, this will likely result in less impact in terms of climate change and air quality.

58. Other spatial distribution and site options were revisited following the Preferred Options Regulation 18 plan, including options at lower tier settlements and new settlements to relieve development pressure at Tier 1 settlements in particular. Whilst these representations were reflected on, it was still considered that the settlement hierarchy was justified through the Rural Services and Facilities Audit 2021(ref [EB15](#)) and that more growth to smaller settlements would not be sustainable, owing to far fewer services and facilities. Four new settlement site options identified as ‘potentially suitable’ in the Council’s Strategic Housing Economic Land Availability Assessment (ref [EB19](#)), were assessed through the Housing Site Assessment Topic Paper 2024 (ref [EB20](#)). In addition, a spatial option including an ‘area of search’ for a new settlement to be delivered beyond the plan period was assessed through Option G of the Spatial Strategy Topic Paper (ref [EB14](#)). However, these reasonable alternatives did not perform as well as the chosen site or strategy.

#### Developers and planning agents – key issues raised

- The development industry generally felt that the housing requirement was too low, and that an uplift should be applied to our own needs, particularly on the basis of economic growth and affordability.
- Growth should be directed to most sustainable locations
- Many also felt that the 4000 home contribution was insufficient to meet wider unmet needs of the GBBCHMA and that this component of the housing requirement should be increased
- Some developers argued that the GBBCHMA Strategic Growth Study which formed the basis for the 4000 home contribution to unmet needs of the HMA was out of date.
- Some felt that the plan period should be extended, as they considered that adoption of the plan would take longer than programmed.
- Many felt that additional sites should be identified and were putting forward the case for the omission site they were promoting

#### How these responses informed the submitted Regulation 19 plan

59. Representations asserting that there should be an uplift to South Staffordshire’s housing need to reflect local affordability and economic growth plans were considered post Regulation 18 stage. The argument for an economic uplift was addressed in the 2024 Economic Development Needs Assessment – update (ref [EB44](#)) at paragraphs 7.44-7.46. It suggests that additional houses would not reduce cross boundary commuting flows, but likely perpetuate current commuting patterns and low resident and workplace self containment, particularly given the significant proportion of ‘larger than local’ strategic sites in South Staffordshire.



60. As detailed in paragraphs 4 and 5 of the paper, developer representations calling for a higher housing requirement and further Green Belt release were considered alongside concerns from residents at the amount of Green Belt land being proposed for development when revising the preferred strategy.
61. As set out in Paragraph 4 of this paper, with the pause to plan preparation, the Council considered the view that the GBBCHMA Strategic Growth Study was out of date was now valid, and therefore no longer provided a sound evidential basis for the previous 4000 home contribution. Reflecting this position, an update to this work has now been commissioned and is underway.
62. As confirmed in paragraph 37 of this paper, representations requesting an extension to the plan period were considering following the Regulation 18 stage, with the plan period now running to 2041 which the Council consider should ensure that the plan period runs for 15 years post adoption.
63. As set out in paragraph 48 of this paper, omission sites were considered alongside proposed allocations on a consistent basis through the site assessment process.

#### Statutory bodies and other stakeholders – key issues raised

- Broad support from neighbouring authorities for the proposed 4000 home contribution to wider unmet needs of the HMA, as well as making a contribution towards unmet employment land needs of the FEMA, noting the West Midlands Green Belt and need to minimise infrastructure implications for neighbouring areas. However, there were concerns raised from Stafford Borough Council regarding the proposed allocation south of Stafford that it does not form a suitable approach to meeting Birmingham's needs.
- Staffordshire County Council considered that housing development outside of 2/3 mile school walking catchments may increase strain on the public purse through provision of extra school transport costs, and may not be sustainable; detailed comments provided on where school capacity improvements would likely be required.
- Approach of working cross boundary to consider and deliver the necessary infrastructure on sites that adjoin neighbouring areas is supported, this should include playing pitches and indoor sports facilities.
- Difficult to assess how historic environment has been considered in relation to cumulative impact of proposed housing development.
- Support the policy approach in Policy DS3 (Policy DS5: Spatial Strategy to 2041 in submitted plan) , as the development close to the neighbouring Black Country considers the impact of development on the healthcare infrastructure and health and wellbeing of local residents
- Windfall allowance too conservative and should be increased to 100 dwellings per annum; the over allocation to ensure plan flexibility should be removed.
- Some support for further growth at smaller settlements to help sustain shops and services.

### How these responses informed the submitted Regulation 19 plan

64. Whilst concerns from Stafford Borough were acknowledged, it is not the case that the allocation south of Stafford has been identified to specifically meet cross boundary unmet needs from Birmingham. Equally, the site is not in the Green Belt and was still considered a suitable and sustainable allocation when reassessed through the Housing Site Assessment Topic Paper 2024 (ref [EB20](#)).
65. The Council was conscious of representations from Staffordshire County Council expressing concerns with housing developments outside a 2/3 mile school walking catchment when revising the plan's spatial strategy following the pause to plan preparation in January 2023. The Council was mindful that proposed strategic housing allocations on the edge of the Black Country urban area in the 2022 Publication Plan would involve pupils travelling to secondary school by bus, and in that sense, were less sustainable than the district's Tier 1 settlements where development would be within walking distance of secondary schools.
66. The Council's Playing Pitch Strategy (ref [EB94](#)) and Indoor Sports Facilities Strategy (ref [EB70](#)) did consider the cross boundary role of facilities. Proposed strategic allocations that had the greatest cross boundary implications adjoining the Black Country were removed from the plan following the 2022 Publication Plan consultation. No issues have been raised by neighbouring authorities in relation to such facilities through representations to the April 2024 Publication Plan or subsequent signed Statements of Common Ground.
67. Following the Regulation 18 Preferred Options consultation, the Council's historic environment evidence was updated through a Stage 2 Historic Environment Site Assessment (ref [EB75](#)). The Council considered this to be proportionate evidence that identifies clear mitigation measures for proposed allocations. It was not clear how a cumulative assessment of impacts on the historic environment would lead to a different outcome.
68. Regulation 18 representations seeking a higher windfall allowance were considered, however it was felt that the proposed 40 dwelling per annum windfall allowance remained appropriate. The reasoning for this is set out in the Strategic Housing Economic Land Availability Assessment 2023 (ref [EB19](#)) at paragraphs 5.56 – 5.66. This explains in full why a higher or lower figure has not been selected having regard to recent housing completions data and expected future trends. Equally, it is considered that the over-allocation against the housing requirement is justified to ensure a level of flexibility to account for the potential non-delivery of site allocations over the plan period.
69. As set out in paragraph 58 of this paper, representations seeking higher housing growth at lower tier settlements were considered; however it was felt that the proposed approach of directing the majority of housing development to higher tier settlements remained appropriate, and responded to residents concerns about infrastructure as per paragraph 6 of this paper. The submitted strategy does still

allow for limited development at lower tier settlements, including through rural exception sites, which can help support the limited services in those settlements.

### **Question 6 – New Settlement**

#### Residents – key issues raised

- Some support for new settlement to meet longer term development needs
- Should be built with all necessary infrastructure, on an existing transport route, to be self-sustaining and reduce impact on existing villages
- Should not be in Green Belt

#### How these responses informed the submitted Regulation 19 plan

70. In response to the clear support for pursuing a new settlement, as detailed in paragraph 58, four freestanding new settlement options were reassessed following the Preferred Options Regulation 18 consultation; however, none were considered suitable for allocation. This included one site option located beyond the Green Belt. As set out in this paper, the strategy of focusing growth primarily on the district's most sustainable Tier 1 settlements was considered to respond to resident concerns and be the most appropriate strategy to take forward to submission.

#### Developers and planning agents – key issues raised

- Concerns with long lead in times, scale of infrastructure required, and complex nature of such projects
- More sustainable to extend existing settlements in first instance
- Questioning why the policy is included when it applies to a time period outside the scope of the plan
- A new settlement should not be built at expense of safeguarded land to provide a more permanent Green Belt boundary.

#### How these responses informed the submitted Regulation 19 plan

71. As detailed in paragraph 58, four freestanding new settlement options were reassessed following the Preferred Options Regulation 18 consultation and none were considered suitable for allocation. The complexity and long lead in times associated with a new settlement was a factor in the previous strategy (set out in the 2022 Regulation 19 consultation) only including an 'area of search' for a freestanding new settlement beyond the plan period. However, having reflected on concerns that the policy applies to a time period outside the scope of this plan, the decision was taken to remove this policy, as actively pursuing a new settlement for consideration in the next Local Plan was not contingent on these parameters (general location) being established in policy.

#### Statutory bodies and other stakeholders -key issues raised

- Some concern from Parish Councils that the need for a new settlement is not proven and would not be consistent with long term climate goals.
- Some neighbouring authority support for the long-term aspiration to identify a new settlement and the role this could play in meeting wider housing shortfall.
- Staffordshire County Council considered that the new settlement policy should not be limited to freestanding new settlements, but also consider expanding existing settlements; suggest County Council landholdings west of Penkrige should be considered. The proposed strategic allocation north of Penkrige should ensure future connectivity to the promoted site west of Penkrige, to ensure it is not sterilised.
- Numerous other issues and constraints were cited as factors influencing the location of a future new settlement including: avoiding impact on designated sites, contributing to green infrastructure an ecological networks, air quality, protection and enhancement of the historic environment, impact on infrastructure including the Strategic Road Network and sewage treatment facilities.

#### How these responses informed the submitted Regulation 19 plan

72. Whilst new settlement options were assessed as reasonable alternatives through the Housing Site Assessment Topic Paper 2024 (ref [EB20](#)), none of these were deemed to perform well enough to deviate from our preferred spatial strategy. Equally, as set out in paragraph 71, reflecting on representations questioning the rationale for having a new settlement policy that extended beyond the plan period, it was agreed that the policy should not be included in the April 2024 Regulation 19 plan.
73. The site promoted by Staffordshire County Council at Penkrige was assessed as a new settlement reasonable alternative through the Housing Site Assessment Topic Paper 2024 (ref [EB20](#)). However, it was not considered appropriate that the plan set policy requirements for the proposed allocation North of Penkrige to unlock the access for this omission site.

### **Question 7 – Strategic Housing Allocations**

#### Residents – key issues raised

- Impact on and loss of Green Belt/Open Countryside
- Site specific concerns with the following commonly raised: impact on landscape, transport and highway network, environment, wildlife, biodiversity, climate change, existing services and facilities, access to health and social services and education, loss of farming land, increased pollution, flood risk, loss of green space, impact on mental health and wellbeing
- Brownfield land should be used in preference to Green Belt
- Loss of important strategic gaps between South Staffordshire and the conurbation; urban sprawl

- Support for the non-identification of alternative strategic sites in Lower Penn

#### How these responses informed the submitted Regulation 19 plan

74. Site specific concerns from residents with the proposed strategic housing allocations were considered when revisiting the Housing Site Assessment Topic Paper 2024 (ref [EB20](#)). Between the Regulation 18 Preferred Options stage and the 2024 Regulation 19 Publication Plan stage, two strategic allocations (Land at Linthouse Lane and Cross Green) that were considered less sustainable were removed in line with revisions to the strategy set out in paragraphs 4 and 5 of this paper.
75. The specific residents' concerns (e.g. loss of green space, impact on transport/highways) raised were carefully considered as the strategic allocations policies (Policy SA1 – Land East of Bilbrook and Policy SA2 – Land North of Penkridge) evolved through to the submitted versions. The submitted policies saw extensive revisions from the Regulation 18 versions to these policies, in order to provide more detail on site specific requirements covering a number of the themes raised by residents; for example, on and off-site infrastructure requirements and mitigation requirements. In addition, visions, objectives and concept plans for the sites were produced to provide a clear spatial understanding of how the developments could be delivered. Furthermore, between the Preferred Options Regulation 18 consultation and the 2024 Regulation 19 Publication Plan an additional policy was added (Policy MA1), which sets out the technical evidence that will be required through masterplanning these strategic sites. This included evidence that will consider/address some of the residents' concerns; for example, requirements for an infrastructure delivery strategy, movement and access strategy and green infrastructure framework.
76. Representations expressing concerns about the loss of strategic gaps between South Staffordshire and the conurbation and urban sprawl were considered prior to finalising the proposed allocations in the 2024 Regulation 19 consultation, specifically relating to the East of Bilbrook strategic allocation (Policy SA1). However, the Green Belt Assessment evidence base (ref [EB18](#)) considered the parcel of land's role in contributing to Green Belt Purpose (a) (avoiding urban sprawl) and Purpose (b) (avoiding towns merging), and these findings were taken into account as part of the site selection process. It was therefore considered that this had already been appropriately factored into the process.

#### Developers and planning agents – key issues raised

- Support for rail-based Park and Ride at Brinsford
- Support for masterplanning approach
- Sites are not deliverable
- Support from site promoters for the identification of their sites

#### How these responses informed the submitted Regulation 19 plan

77. Some developers expressed concern through their Regulation 18 Preferred Options consultation responses around deliverability of strategic housing allocations, due to them being more complex to deliver than smaller edge of settlement sites. Following these representations, in order to provide greater confidence on site deliverability, additional work was undertaken with the site promoters in developing the site-specific policies and concept plans. In addition, Statements of Common Ground (ref [DC41](#) and [DC42](#) ) have been agreed prior to submission between the Council and developers setting out what the sites will deliver and a trajectory for delivery.
78. Support for Brinsford Park and Ride was noted, however as set out in paragraph 27 of this paper, the change to the strategy in the 2024 Regulation 19 plan meant that the allocation that would have safeguarded land for the station was not taken forward.

#### Statutory bodies and other stakeholders – key issues raised

- Strong Parish Council and councillor objection to strategic housing allocations where these fell within their area. Multiple areas of concern provided including: impact on Green Belt, loss of farmland, ecological impacts, flood risk, coalescence of settlements and impact on infrastructure including highways, schools and health facilities.
- Neighbouring authorities generally supported the proposed allocations and agreed that the sites should be master planned, and considered that further joint working to address infrastructure requirements was required. Support for continued promotion of rail-based Park and Ride at Brinsford.
- Staffordshire County Council indicated support for the strategic housing allocations subject to a robust transport evidence base which will be presented in the 'Transport Impacts (with SCC) 2022' report.
- The Land north of Penkridge allocation lies within the setting of the AONB and could impact representative viewpoints. Landscape and Visual Impact Assessment should inform the site layout and masterplan.
- Natural England noted potential recreational impacts on Cannock Chase SAC and air quality impacts on this and other designated habitat sites.
- Further flood zone assessment required to ensure accuracy of boundaries especially taking into account updated climate change allowances.
- Include Historic Environment Site Assessment recommendations in the policies and ensure full consideration to historic environment is given at the masterplanning stage.
- National Highways advised on which junctions would most likely be affected from the proposed strategic housing allocations. They advised that they had sought to agree a SATURN model with Staffordshire County Council to determine trip distribution and assignment for Local Plan sites. This data is then provided to strategic sites to carry out their own assessments, including mitigation works on the Strategic Road Network.

### How these responses informed the submitted Regulation 19 plan

79. Parish Council concerns relating to the proposed strategic allocations often reflected resident concerns. These were considered carefully and led to the policies relating to the submitted strategic sites (Policy SA1 and Policy SA2) evolving significantly from Regulation 18 stage, as set out in Paragraph 75 of this paper.
80. As set out in paragraph 27, reflecting on the evidence it was no longer considered appropriate for the Local Plan to safeguard land for Brinsford Park and Ride.
81. Following the Regulation 18 consultation stage, the approach of the strategic sites preparing their own Strategic Transport Assessments (ref EB87-EB89) and a cumulative assessment (ref EB90) was agreed with Staffordshire County Council and National Highways. The strategic sites now have live planning applications, and so more comprehensive TAs are now being considered through the planning application process.
82. The representation identifying that the strategic allocation north of Penkrudge fell within the setting of the Cannock Chase AONB was considered following Regulation 18 stage, and resulted in a point being added into Policy SA2 requiring that impacts on views from the AONB are considered.
83. The submitted plan does include Policy NB3 which will ensure that the recreational impacts on Cannock Chase SAC are mitigated through developer contributions. As set out in paragraph 20 of this paper, since Regulation 18 stage, air quality impacts on designated habitat sites have been considered through the evidence base and a SoCG agreed with Natural England setting out that no adverse effects are expected.
84. Following Regulation 18 stage, a stage 2 Strategic Flood Risk Assessment (ref EB64) was undertaken to reflect accurate flood boundaries, and included an assessment and recommendations for the two strategic housing allocations in the submitted plan. Both policies SA1 and SA2 also require a site-specific flood risk assessment at the planning application stage.
85. The request for the Historic Environment Site Assessment (HESA) (ref EB75) recommendations to be incorporated into the submitted plan were made where practicable to do so. In some cases, the recommendations were considered too detailed to include in policy verbatim, so a cross reference back to the HESA was made, including in the policies for the strategic housing allocations (Policy SA1 and SA2).

### **Question 8 – Non-strategic housing allocations**

#### Residents – key issues raised

- Impact on and loss of Green Belt/Open Countryside
- Site specific concerns with the following commonly raised: impact on landscape, transport and highway network, environment, wildlife, biodiversity, climate change, existing services and facilities, access to health and social services and education, loss of farming land, increased pollution, flood risk, loss of green space, impact on mental health and wellbeing, heritage assets
- Brownfield land in the West Midlands conurbation should be used in preference to Green Belt
- Loss of important strategic gaps between South Staffordshire and the conurbation; urban sprawl
- Support for the non-identification of alternative sites in Lower Penn
- Other villages are more suitable for development

#### How these responses informed the submitted Regulation 19 plan

86. As set out in paragraph 4 and 5 of this paper, concerns about the impact on Green Belt was a factor in the Council revising its spatial strategy and focusing Green Belt release solely on Tier 1 settlements, which in turn saw a number of Green Belt allocations removed in the 2024 Regulation 19 Publication Plan.
87. Site specific concerns from residents to the proposed non-strategic housing allocations were considered following the Regulation 18 Preferred Options consultation when revisiting the site assessment results. Between the Regulation 18 Preferred Options stage and the 2024 Regulation 19 Publication Plan stage, a number of proposed allocations were amended or removed, taking account of representations made. This included a reduction in the size of the proposed allocation (ref 036c) at Land at Weeping Cross due to heritage impacts.
88. As set out in paragraph 9 of this paper, the Council has been mindful of residents concerns that brownfield land in West Midlands conurbation was not being fully utilised and have continued to push for neighbouring urban authorities to maximise brownfield land delivery in their urban area. In addition, in part to address these concerns, the Green Belt Exceptional Circumstances Topic Paper (ref [EB16](#)) was published to set out how non-Green Belt site options (including brownfield land) were considered sequentially in preference to Green Belt sites, alongside the Housing Site Assessment Topic Paper (ref [EB20](#)) that sets out the assessment of reasonable alternative brownfield options.
89. The Council considered representations expressing concern that site proposals would result in encroachment into the Green Belt, however the Green Belt assessment had already taken account of this in arriving at judgements, and therefore it had been adequately considered through the site assessment process.

#### Developers and planning agents - key issues raised

- Support from site promoters for the identification of the sites



- Promotion of omission sites and objection to the site assessment scoring against specific criteria.

#### How these responses informed the submitted Regulation 19 plan

90. As set out in paragraph 48 of this paper, representations from omission sites were reflected on through updating the site assessment papers. Often representors were objecting to how their site scored against specific criteria (e.g Landscape Sensitivity Study). However, the Council continues to assert that the site assessment process has been undertaken transparently and objectively. It considers the judgements in the evidence base that have determined the scoring against specific factors, such as landscape sensitivity, to be correct.

#### Statutory bodies and other stakeholders - key issues raised

- Strong Parish Council and councillor objection to housing allocations where these fell within their area. Multiple areas of concern provided including: impact on Green Belt, harm to landscape, loss of farmland, ecological impacts, flood risk, coalescence of settlements, developments not needed as overproviding to unmet needs/insufficient windfall allowance and impact on infrastructure including highways, schools and health facilities.
- General support from neighbouring authorities but comments that the infrastructure and service needs of residents who reside across administrative boundaries should also be considered, including the proposed allocation at Langley Road where Wolverhampton residents should get affordable housing nomination rights.
- Staffordshire County Council confirmed that they did not see any insurmountable problems that would prevent the allocated sites being delivered.
- The Cannock Chase AONB Unit felt that the erosion of the Green Belt to the east of Huntington is a serious concern given the village's setting, proximity to the AONB and the surrounding topography, and that the allocation at Limepit Lane, Huntington, should be reconsidered. Requested further assessment of the site allocations that could impact on the views and setting of the Cannock Chase AONB. Housing development on the higher site elevations of site 036 should be avoided.
- Natural England detailed where allocations could have impacts on designated habitat sites and AONBs/National Landscapes and confirmed that a transport assessment would be required to understand the potential impacts of proposed allocations on air quality and the resultant impact on designated habitat sites.
- Environment Agency recommended the sites that would require a Level 2 Strategic Flood Risk Assessment.
- Historic England detailed where allocations could have an impact on heritage assets and requested that mitigation measures should be included in the policy.

- National Highways requested early consultation on sites to ensure appropriate assessments are carried out to identify the form of any mitigation required for the SRN and appropriate boundary treatments.
- Site 082 should ensure that a replacement playing pitch is provided.

#### How these responses informed the submitted Regulation 19 plan

91. Parish Council concerns relating to the allocations often reflected resident concerns and were considered carefully following Regulation 18 stage. However, as set out in paragraph 48 of this paper, it was considered that the site assessment process and factors considered remained robust. Concerns about infrastructure were noted, and as a result strong policies were developed to ensure the necessary infrastructure was delivered, as detailed in paragraph 7 of this paper. The approach to the windfall allowance was reflected on, but it was considered that 40 dwellings per annum was appropriate, as set out in paragraph 68 of this paper.
92. The cross-boundary sites directly adjoining the neighbouring Black Country urban area were removed from the plan following the pause to plan preparation in January 2023, including the Langley Road site referenced. Nevertheless, the council does not consider affordable housing nomination rights as a planning matter that needs to be established through the Local Plan.
93. The Council agreed with the Cannock Chase AONB Unit representation expressing concern with the proposed allocation in the Regulation 18 Preferred Options plan at Limepit Lane, Huntington; therefore the site was reassessed through the Housing Site Assessment Topic Paper 2024 (ref [EB20](#)) and subsequently removed from the plan. Equally, site 036c was reconsidered and reduced in size following Regulation 18 stage, to avoid allocating the more sensitive parts of the site. In addition, in the site proforma for the site a requirement was added to “demonstrate measures taken to minimise light spillage to help conserve the darker skies of the AONB and reduce impacts on wildlife”.
94. Policy NB1 sets out a strong policy approach to protecting designated habitat sites. As detailed in paragraph 20 of this paper, air quality impacts on designated habitat sites were considered through the evidence base, with it subsequently agreed with Natural England that no adverse effects were predicted.
95. Following Regulation 18 stage, a stage 2 Strategic Flood Risk Assessment (SFRA) (ref [EB64](#)) was undertaken as requested by the Environment Agency.
96. As set out in paragraph 22 of this paper, mitigation measures that had been recommended in the Stage 2 Historic Environment Site Assessment (HESA) (ref [EB75](#)) were referenced in the plan where practicable to do so. Cross reference back to the HESA was made in the appropriate policies/proformas, reflecting that the recommendations were too detailed to include in the policy in full, in many instances.

97. The proforma in the submitted plan for site 082 does include a requirement to provide a replacement play pitch, reflecting the request from Sports England.

### **Question 9 – Gypsy and Traveller pitch allocations**

#### Residents – key issues raised

- Impact on and loss of Green Belt
- Temporary permissions should not be made permanent
- Issues with antisocial behaviour and social cohesion with settled community, with the allocation of 122 Streets Lane of particular concern.

#### How these responses informed the submitted Regulation 19 plan

98. Partly reflecting representor concerns relating to traveller site allocations in the Green Belt (and also in an attempt to identify additional supply), further exploration of site options was undertaken following the Regulation 18 Preferred Options consultation on Staffordshire County Council owned land (ref [EB35](#)). Whilst this did include some land parcels outside the Green Belt, these were discounted for other reasons (e.g highways concerns). Given this, it is considered that there are no other options available to the Council other than to allocate pitches in the Green Belt. However, intensification of existing sites has been proposed where this represented a suitable option, in order to minimise impact on surrounding Green Belt and address residents' concerns to some extent.
99. The Council did not agree with representations from residents that, as a point of principle, temporary permissions should not be made permanent. It's clear that such families are in need of a pitch, owing to the fact that the GTAA (ref [EB34](#)) identified any families on temporary pitches as needing a permanent pitch. Equally, allocating pitches on sites with existing temporary consents (and therefore allowing these to become permanent) would result in less impact on the Green Belt than introducing wholly new pitches/tourers. Given this, the submitted plan does include proposed allocations on a site where a 5-year need from families on temporary pitches was identified through the GTAA.
100. During the Preferred Option Regulation 18 stage, some representors raised issues around impact on neighbouring amenity in relation to one site that had been proposed for allocation – 122 Street Lane, Great Wyrley. These concerns were considered alongside other material considerations relating to impact on openness of the Green Belt, resulting in a decision to remove the site as a proposed allocation from subsequent versions of the Local Plan. This is expanded on further in paragraphs 7.3-7.5 of the Gypsy and Traveller Topic Paper 2024 (ref [EB33](#)).

#### Developers and planning agents – key issues raised

- Support for allocations, and Gypsy and Traveller sites to be removed from the Green Belt once allocated

#### How these responses informed the submitted Regulation 19 plan

101. Whilst the request for sites to be removed from the Green Belt was considered following Regulation 18 stage, the Council felt that this was not necessary for the approach to Gypsy and Traveller allocations to be sound, as set out in section 2 of the 'Exceptional Circumstances for release of Gypsy and Traveller sites from the Green Belt Topic Paper' (ref [EB32](#)). However as explained in that document, the Council is open to amending the Green Belt boundary around Gypsy and Traveller sites if the inspectors consider this a more appropriate approach.

#### Statutory bodies and other stakeholders – key issues raised

- Representations from some Parishes suggested that rather than extending existing traveller sites, a fairer distribution should be provided across all 27 Parishes. Planning enforcement issues at proposed allocation at 122 Streets Lane cited.
- Neighbouring authorities acknowledged that use of Green Belt land would be required to meet the pitch requirements.
- National Highways requested early consultation on sites to ensure appropriate assessments are carried out to identify the form of any mitigation required for the SRN and appropriate boundary treatments.
- Mitigation measures needed to ensure visual impact on Canal Conservation Areas are addressed.

#### How these responses informed the submitted Regulation 19 plan

102. Whilst Parish Council concerns with the distribution of pitch allocations was recognised, through the Regulation 18 Preferred Options consultation the council did ask if alternative site suggestions should be considered, however only one site option was suggested. This was subsequently considered unsuitable, as detailed further in the Gypsy and Traveller Topic Paper 2024 (ref [EB33](#)) – see paragraph 7.2. The Council believes that the approach in the submitted plan of meeting need where it arises, by allocating suitable sites with capacity where there is a current 5-year need from families to be the correct one. If the Council allocated privately owned sites throughout the district that were not owned by traveller families generating the need, then there would be no mechanism in place to ensure that these families needs were being met. As set out in paragraph 100 of this paper, following Regulation 18 stage, and reflecting on representations received, it was decided that 122 Streets Lane should be removed as a proposed allocation.

103. In the submitted plan the site proformas in Appendix D include cross reference to the 2022 Historic Environment Site Assessment (ref [EB75](#)) recommendations where relevant to pitch allocations, to ensure that mitigating any impact on Canal Conservation Areas is a policy requirement.

## **Question 10 – Employment allocations**

### Residents – key issues raised

- Impact on Penkridge and surrounding settlements from WMI
- Brownfield land should be used as a priority
- Opposition to large employment developments due to scale and impact on local countryside/road infrastructure.

### How these responses informed the submitted Regulation 19 plan

104. Whilst concerns on the impact of West Midlands Interchange on Penkridge and the local area were recognised, not allocating the site would not stop the site coming forward as it had already been approved through the Development Consent Order (DCO) process.
105. It was agreed that brownfield land should be used as a priority, and the submitted plan does include within the employment land pipeline some predominantly brownfield sites, i.e ROF Featherstone. Equally, following the Regulation 18 stage, Policy EC1 was developed to include reference to employment land coming forward on Previously Developed Land sites in sustainable locations, consistent with this objective.
106. Following the Regulation 18 consultation, the employment site assessment process set out in the Economic Strategy and Employment Site Assessment Topic Paper 2024 (ref [EB42](#)) ensured that a high level assessment by Staffordshire County Council highways and environmental factors were considered through the assessment process.

### Developers and planning agents – key issues raised

- Overemphasis on development north of M54
- Support for WMI
- Promotion of omission employment sites
- Strategy should not deny other employment sites being brought forward, particularly if WMI is delayed
- South Staffordshire should make provision for shortfall in employment land availability in the Black Country

### How these responses informed the submitted Regulation 19 plan

107. The submitted strategy for employment land delivery is to deliver the district's pipeline of strategic employment sites over the plan period, and meet South Staffordshire's own objectively assessed needs with a proportionate contribution to unmet needs in the Functional Economic Market Area without Green Belt release. All the large existing sites in the supply are in the north of the district

reflecting their proximity to the Strategic Road Network, as is the area of Open Countryside beyond the Green Belt where a further strategic allocation is proposed (M6 Junction 13). Notwithstanding this, all site suggestions in the south of the district were still assessed as reasonable alternatives on a consistent basis through the Economic Strategy and Employment Site Assessment Topic Paper 2024 (ref [EB42](#)). Therefore, whilst it was recognised that the vast majority of existing and proposed employment sites are in the northern part of the district, it was considered that this remained an appropriate strategy in the submitted plan.

108. The Council agreed that the economic strategy in the plan should not deny other non-allocated employment sites coming forward in appropriate circumstances. The submitted Policy EC1 drafted following Regulation 18 stage does reflect this by making it clear that while the district's six strategic employment sites will be the focus for economic growth, expansion and/or new premises within existing employment areas, employment development at Tier 1 and 2 villages, and diversification of the rural economy will also be supported.
109. Representations requesting that South Staffordshire make provision for the shortfall in employment land were acted on following the Preferred Options Regulation 18 consultation and following updates to our Economic Development Needs Assessments (Doc ref [EB44](#) and ref [EB45](#)). The 2024 EDNA update provided the evidence base for determining the potential contribution to wider unmet needs, which was increased following the proposed allocation at M6, Junction 13. The Council, alongside the authorities receiving a contribution to their unmet needs (the four Black Country FEMA authorities and Cannock Chase DC), subsequently agreed through a Statement of Common Ground (ref [DC5](#)) that our proposed contribution was proportionate.

#### Statutory bodies and other stakeholders – key issues raised

- Support from neighbouring authorities and Staffordshire County Council for the allocation of West Midlands Interchange
- National Highways confirmed that as no additional employment sites were identified above existing supply, a transport evidence base for employment sites was not required.
- Natural England highlighted potential air quality impacts on designated habitat sites.
- Concern from Penkridge Parish Council about the impact of West Midlands Interchange.

#### How these responses informed the submitted Regulation 19 plan

110. Concerns on the impact of West Midlands Interchange on Penkridge and the local area were acknowledged, however the site has already been consented through the Development Consent Order (DCO) process.

111. Following Regulation 18 stage, air quality impacts on designated European habitat sites were assessed as set out in paragraph 20 of this paper, with no adverse effects predicted. This assessment incorporated West Midlands Interchange as a committed development.

### **Question 11 – Development Management policies**

#### Residents – key issues raised

- Density assumptions should be increased to preserve Green Belt
- Many residents under this question raised site specific concerns with proposed allocations

#### How these responses informed the submitted Regulation 19 plan

112. Regulation 18 representations relating to housing density were taken on board prior to finalising Policy HC2 - Housing Density in the 2024 Regulation 19 Publication Plan. This included considering representations requesting that density be increased for new developments, whilst conversely considering representations (often from developers) arguing that setting density standards too high could be overly constraining in creating good quality developments. The Council did consider these views carefully, and following Regulation 18 produced a Housing Density Topic Paper 2024 (ref [EB21](#)) prior to consultation on the 2024 Regulation 19 Publication Plan, which provided an evidence base to justify the approach in Policy HC2. This seeks a balanced approach by seeking an efficient use of land and a minimum density standard in the most sustainable settlements and in infill locations, whilst also considering local character.

#### Developers and planning agents - key issues raised

- Housing policies – type, tenure and mix, are too restrictive and should be more flexible
- Requiring 30% of properties built to M4(2) Building Regulations standard is excessive
- No evidence to justify meeting nationally prescribed house building standards; will impact on viability
- Self-build plots on all sites too onerous; separate custom build sites preferred; mechanism needed for plots to come forward as market homes where there is a lack of demand for self and custom build plots.
- Policies should be NPPF compliant, not bespoke
- Flexibility regarding requiring EV charging points is required
- Requirement for an Employment and Skills Plan in Policy EC3 is not supported, as housing developers' business model relies on subcontracting.
- Council does not need to set locally energy efficiency standards but defer to national standards in Building Regulations
- Numerous changes of wording and emphasis suggestions put forward to amend policies as proposed

### How these responses informed the submitted Regulation 19 plan

113. Developers concerns with the requirements of our housing policies were consistently made throughout Regulation 18 and Regulation 19 consultations, including requirements around housing mix, affordable housing, space standards, older persons provision and self build. The general theme of the comments were that they were too restrictive on developers and that a more flexible policy approach was required. When reflecting on these comments, it was considered that overall, they struck the correct balance detailing requirements to address evidenced needs, whilst providing sufficient flexibility to respond to site specific circumstances; for example, the housing mix requirement of requiring 70% of market homes to contain 3 bedrooms or less on major developments.
114. Following the 2021 Preferred Options consultation, in 2022, the government confirmed in a response to a 2020 national consultation, their intention to mandate Part M4(2) of Building Regulations for all new homes. Based on this direction of travel and recommendations in the Housing Market Assessment, the 2022 Publication plan and submitted plan include requirements in Policy HC4 for all properties to meet this standard. Concerns regarding this were taken account of in the Local Plan Viability Study, which demonstrated this requirement to be deliverable.
115. Following concerns at Regulation 18 stage that no evidence had been presented to justify requiring adherence to the Nationally Described Space Standard, a Topic Paper was produced to provide this justification (ref [EB24](#)). A cost associated with this had been factored into the Viability Assessment (ref [EB41](#)).
116. Representor concerns that self build plots on all sites would be too onerous was noted, however this was not the proposed approach in the submitted plan, instead requiring applicants of major housing developments to have regard to the self build register when proposing a mix of properties. It was considered that Regulation 18 representors seeking a mechanism to allow plots to be built out as market properties was a valid point, with the final submitted policy responding to this by allowing plots to be developed as market properties after 12 months of marketing as self and custom build plots.
117. The proposed approach in the submitted plan for Electric Vehicle charging points is in line with current building regulations and is considered appropriate.
118. It was accepted that large house builders' business model required subcontracting, and that this point was raised by a number of large housebuilders. However, whilst implementing the policy may involve some change of approach for larger housebuilders, it was certainly not considered insurmountable, and would see greater benefits of new development realised locally.



119. Consideration was given to representations from developers stating that prescribing local energy efficient standards should not be pursued. and that building to basic building regulation standards was more appropriate. The Council considered these alongside other representations calling for the Council to take a more ambitious approach to tackling climate change. On reflection, it was considered that it was necessary for the Local Plan to take a strong position on climate change and sustainable construction, and as such, additional evidence (refs [EB61](#) and [EB61a](#)) was produced prior to the April 2024 Regulation 19 consultation to ensure this more ambitious approach in Policies NB6A, NB6B and NB6C were evidenced.

#### Statutory bodies and other stakeholders - key issues raised

- Some Parish Councils expressed concern with the proposed density policy, highlighting a need for a soft transition into the open countryside and identifying issues of parking and pedestrian safety associated with higher density. Other comments from Parish Councils included a request that 90-95% of properties should be 3 bed or less, a 40% affordable housing requirement, and 30% of properties to meet older persons needs. There was a call for greater emphasis in the plan on facilitating low carbon heating systems and more retrofit, battery storage systems and other renewable energy generation sites.
- Neighbouring authorities expressed support for the general direction of travel for Policy NB3 – Cannock Chase SAC, but impacts from increased road traffic emission should be considered.
- Staffordshire County Council requested that Policy EC1 mention public transport access to employment land and that HGV parking should be identified as necessary infrastructure in the policy. Design guidance to reflect cycling requirements LTN/120 should be included. It was also suggested that additional policy is required to ensure development is catered for by gigabit-capable connectivity. Details of a number of evidence-based documents were provided, that needed referencing under key evidence, including Integrated Transport Strategy and Bus Services Improvement Plan.
- Request for signposting to the AONB Design Guide in relation to proposed developments with the Cannock Chase National Landscape (AONB).
- The Environment Agency provided detailed comments, in particular relating to the flood risk policy (Policy NB7) and the requirement for surface water drainage strategies where necessary, no development within 8 meters of cultivated watercourses, and a requirement to take account of the latest climate change scenarios in flood risk modelling.
- Support for commitments to active travel and sustainable transport in the policies.
- Historic England provided detailed comments, in particular on the main policy relating to the historic environment (Policy NB8). They suggested renaming the policy to 'Protection and enhancement of the historic environment and heritage assets'. It was also requested that the policy consider archaeology and should not support enabling development as had been proposed. There

was also a request for heritage to be referenced in the canal network policy (Policy NB10)

- Natural England confirmed that potential air quality impacts on designated European sites is needed, and a separate policy considered. The role of the natural environment to reduce climate change effects should be recognised. The Natural Environment policy (Policy NB1) should provide the hierarchy of designated sites and reference to protecting soils and agricultural land should be made in the policy in line with the NPPF.
- The plan could go a long way in its aspiration for development to contribute towards flood risk reduction by limiting any new connections of surface water made to the combined sewerage system through careful allocation and/or planning policy.

#### How these responses informed the submitted Regulation 19 plan

120. Concerns from some Parish Councils relating to the density of new developments were taken on board when evidencing Policy HC2: Housing Density, through the Housing Density Topic Paper 2024 (ref [EB21](#)). This seeks a balanced approach by seeking an efficient use of land and a minimum density standard in the most sustainable settlements and in infill locations, whilst also considering local character.
121. It was not considered that the suggestion for 40% affordable housing and 95% of properties to be 3 bed or less was supported by the evidence, with the latest Housing Market Assessment (ref [EB27](#)) justifying the plan's requirement for 30% affordable housing and a need for around 70% of properties to be 3 bed or less.
122. As set out in paragraph 20 of this paper, the concerns regarding impact of traffic emission on Cannock Chase SAC and other designated habitat sites were addressed through an air quality evidence base, commissioned across the sub region, with it subsequently agreed through a SoCG with Natural England (ref [DC3](#)) that no adverse effects were predicted.
123. Reflecting representations from Staffordshire County Council, the submitted version of Policy EC1 does include specific reference to supporting additional overnight freight parking in line with the latest freight strategy for Staffordshire. Equally the final policy made clear that employment proposals should be accessible by sustainable transport modes. Specific reference to adherence with the standards set out within LTN/120 or subsequent additions was added to the submitted version of Policy EC12: Sustainable Transport. Following Regulation 18 stage, Policy EC13: Broadband was included in the submitted plan to ensure that new developments had access to gigabit-capable connectivity, as requested. In addition, the submitted plan expands the list of key evidence to include the documents requested by Staffordshire County Council.

124. Policy NB4: Landscape Character was expanded in the submitted plan to include a requirement to have regard to the Cannock Chase AONB guidance where development was proposed within the AONB/National Landscape or its setting.
125. Recommendations from the Environment Agency (EA) submitted at Regulation 18 stage were included in submitted Policy NB7: Managing flood risk, Sustainable Drainage Systems (SuDS) & water quality, including reference to taking account of climate change in line with EA guidance, the 8 meter cultivated threshold and surface water drainage strategies where required.
126. Policy NB8 was renamed as requested by Historic England, as well as the submitted policy including reference to requiring archaeological assessment in potential areas of interest, and a requirement for archaeological investigations for specific sites, where these had been identified as being required through the Stage 2 Historic Environment Site Assessment (ref [EB75](#)). Consideration of the heritage value of canals was added to Policy NB9: Canal Network in response to their representation.
127. The submitted plan does not include a separate policy on air quality impact on designated habitat sites, with the evidence confirming that no adverse effects are predicted, as set out in paragraph 20 of this paper. The submitted version of Policy NB1 in the submitted plan incorporates the hierarchy of designated sites, the mitigation hierarchy and protection of BMV land and soils.
128. The submitted version of Policy NB7 requires that discharge should not be made into the combined sewer system and early engagement by the developer with Severn Trent Water Ltd will be required to ensure sustainably drained development, in order to address representations from Severn Trent Water.

## **Question 12 – Strategic policies**

### Residents – key issues raised

- Need strategic policy to limit impact on climate change

### How these responses informed the submitted Regulation 19 plan

129. It was agreed that the plan should include strategic policies to limit the impact on climate change. This representation was taken on board in determining the list of strategic policies in the submitted plan, with all policies in the ‘climate change and sustainable development’ section of the plan (Policies NB5-NB7) identified as strategic.

### Developers and planning agents – key issues raised

- Majority support for strategic policies as proposed
- Some concern that policies SA1 – SA7 are not strategic

- Some felt that none of the policy areas in Chapter 6 of the Regulation 18 Preferred Options consultation were strategic, while others felt they needed to see the final draft policy wording to determine which were strategic.

#### How these responses informed the submitted Regulation 19 plan

130. Representations expressing concern that proposed allocation policies were not strategic policies were considered, and the Council contemplated whether it would be appropriate only for the policies that allocated strategic housing and employment sites to be identified as strategic. However, on reflection it was felt that all proposed allocations in the plan were key to delivering the overall development strategy for the district, and therefore all allocation policies (SA1-SA5) in the submitted plan were identified as strategic policies.

#### Statutory bodies and other stakeholders – key issues raised

- Representations from Parish Councils agreed that the strategic policies identified were strategic, but that another strategic policy limiting the impacts of climate change was needed.
- Representations suggesting policies NB1 and NB2 were both strategic.

#### How these responses informed the submitted Regulation 19 plan

131. The Council agreed with comments relating to climate change policies. All policies in Chapter 13: Climate Change and Sustainable Development were therefore included as strategic policies in the submitted plan, with it also agreed that Policies NB1 and NB2 should be listed as strategic.