

Individual Executive Decision Notice

Report title	South Staffordshire Site Allocations Document (SAD) Publication Consultation	
Decision designation	GREEN	
Cabinet member with lead responsibility	Councillor John Reynolds Cabinet Member for City Economy	
Wards affected	All	
Accountable director	Keren Jones, City Economy	
Originating service	Planning	
Accountable employee(s)	Michèle Ross	Senior Planning Officer
	Tel	01902 55(4038)
	Email	Michele.ross@wolverhampton.gov.uk
Report to be/has been considered by		

Summary

This report summarises the issues arising from the South Staffordshire Site Allocations Document (SAD) Publication consultation and sets out the basis for a proposed City of Wolverhampton Council letter of support.

Recommendation for decision:

That the Cabinet Member for City Economy, in consultation with the Service Director, City Economy,

1. Approve the submission of a letter of support for the South Staffordshire Site Allocations Document (SAD) to South Staffordshire District Council (SSDC), which:
 - a. Supports the principle of SSDC progressing the SAD as a sound platform to support the bringing forward of an appropriate supply of land for new housing and employment development to complement the regeneration of Wolverhampton and the Black Country;
 - b. Supports the proposed western extension of the i54 employment site and the bringing forward of additional high quality employment land at Featherstone;
 - c. Supports the intention to carry out an immediate review of the South Staffordshire Core Strategy to address longer term development needs.

This report is PUBLIC
[NOT PROTECTIVELY MARKED]

Signature

Signature

Date:

Date:

1.0 Background

- 1.1 The South Staffordshire Core Strategy was adopted in early 2014, setting out the broad planning strategy and amount of housing and employment development required in the District up to 2028. South Staffordshire Council are now progressing a Site Allocations Document (SAD) to provide detailed policies and allocate sites for development. The Core Strategy and the SAD, when adopted, will form the adopted Local Plan for South Staffordshire and will be used to determine planning applications in the District. It is in the best interests of Wolverhampton that South Staffordshire has in place an up to date and comprehensive planning framework in order to direct new investment to the most appropriate locations and resist proposals which could have a detrimental impact on the regeneration of the City.
- 1.2 Cabinet of 23 April 2014 approved the Council's response to the SAD Issues and Options consultation and agreed to receive further reports at the next stages of the process. Cabinet of 1 October 2014 then approved the Council's response to a supplementary "Additional Sites" consultation.
- 1.3 Cabinet of 24 February 2016 approved the submission of a response to the SAD Preferred Options consultation, which proposed housing development on sites adjoining Perton and Bilbrook / Codsall and employment development on land adjoining i54 and Royal Ordnance Featherstone. This response expressed broad support for the Preferred Option, subject to the allocation of key employment sites and the selection of Green Belt housing sites which would have minimum impact on Wolverhampton.
- 1.4 South Staffordshire Council are now carrying out consultation on the final, Publication version of the SAD. At this stage representations are invited on the "soundness" of the Plan. The consultation period closes on 27 February 2017.

2.0 Summary of the Publication SAD

Housing

- 2.1 The South Staffordshire Core Strategy requires the SAD to allocate land for housing in key settlements, including 163 homes in Perton, 102 homes in Bilbrook and 221 homes in Codsall. The SAD is also required to "safeguard" land for an additional 84, 69 and 74 homes respectively in these settlements during 2028-38. As there is little land in Perton and Codsall / Bilbrook which is suitable for housing development, land needs to be taken out of the Green Belt around their edge to meet these targets.
- 2.2 The key issue for Wolverhampton is the phasing and location of this housing and how this could affect the delivery of regeneration priorities and the setting and amenity of residential areas in the City, in particular in terms of encroachment towards Tettenhall, road access and school place provision.
- 2.3 There are existing road congestion issues in Tettenhall which may be exacerbated by new housing development and the Tettenhall Neighbourhood Plan (2014) therefore

expects South Staffordshire Council to ensure that this development does not have a detrimental effect on the Tettenhall road network.

- 2.4 At Preferred Option stage, City of Wolverhampton Council expressed views on the suitability of certain proposed housing allocations. The Publication SAD is in accordance with these views, with the exception of the allocation of site 443 adjoining Bilbrook and site 406 adjoining Codsall. The allocation of these sites was opposed as alternative sites are available which could place less pressure on the Wolverhampton road network. It was also requested that any detailed proposals should consider the impacts on Wolverhampton in terms of highway and school place implications and the City Council should be consulted on such proposals.
- 2.5 However, these allocations have been made subject to requirements to explore the delivery of through roads to relieve traffic pressure and the delivery of a new primary school to meet the needs of Codsall / Bilbrook. In addition, the Council has no evidence to suggest that sites 443 and 406 are unacceptable in planning terms and will continue to work with South Staffordshire Council and developers to mitigate any adverse impacts.
- 2.6 At a strategic level, City of Wolverhampton Council requested that opportunities should be explored to bring forward safeguarded land for delivery by 2031 to help address the identified housing shortfall in the Greater Birmingham and Black Country Housing Market Area (HMA), which includes South Staffordshire. The SAD has not, as suggested, introduced a policy to bring forward safeguarded land within the Plan period. However, it does include a policy clearly committing the Council to an immediate review of the whole Local Plan to address unmet housing need arising in the HMA, including careful consideration of the role of safeguarded land. The SAD states that the aim is to adopt this new Plan by 2022. This is to be welcomed as it will align well with the Black Country Core Strategy review programme, which is due to be adopted in 2021.

Employment

- 2.7 The Core Strategy supports modest extensions to the four strategic employment sites in the District (i54, Hilton Cross, ROF Featherstone and Four Ashes - all located close to north Wolverhampton), where robust evidence and reasoned justification is provided. South Staffordshire Council and the Black Country authorities have now jointly completed two studies to provide this evidence.
- 2.8 The starting point for the studies was an acknowledged need for the provision of a competitive portfolio of readily developable employment sites to serve Wolverhampton and the Black Country. The studies conclude that there is a shortfall of high quality employment land by 2026 and that i54 and ROF Featherstone are priority sites able to meet much of this shortfall. Therefore the Preferred Options consultation proposed a 40 ha western extension to i54 and a 22 ha extension to ROF Featherstone. City of Wolverhampton Council supported these extensions and requested that they should be made available for development in the short term. The Publication SAD places no time limits on development of these sites, which is to be welcomed.
- 2.9 The Preferred Options consultation identified a number of potential link roads to serve the ROF site. City of Wolverhampton Council responded that employment development

at Featherstone should be served by the most direct, viable access, which presents minimum disruption to the surrounding area. The Publication SAD concludes that further, more detailed assessments are required, involving a comprehensive assessment of the nine original road options in the ROF Featherstone Options Appraisal Report (OAR). Staffordshire Country Council carried out a consultation on these options earlier this year and City of Wolverhampton Council submitted a response expressing support for option 7. Employees continue to work closely with South Staffordshire District and Staffordshire County Councils to agree the most appropriate access to this site, which provides minimum disruption to the local area.

3.0 Proposed Response to the Publication SAD

3.1 It is recommended that the Council submit a letter of support for the South Staffordshire SAD, based on the following principles:

- The SAD creates planning certainty and prevents development from coming forward in inappropriate locations;
- The SAD allocates the western extension to the I54 employment site, which will benefit Wolverhampton;
- The SAD supports the bringing forward of the Royal Ordnance Featherstone employment site, and contains a commitment for South Staffordshire and Staffordshire County Councils to work with City of Wolverhampton Council to agree the most appropriate access to this site, which provides minimum disruption to the local area.
- Although the Council has expressed some concerns about the possible traffic implications of new housing development adjoining Codsall / Bilbrook, the Council has no evidence to suggest that these sites are unacceptable in planning terms and will continue to work with South Staffordshire Council and developers to mitigate any adverse impacts.

4.0 Financial implications

4.1 There are no immediate financial implications arising from this report. Any staffing costs will be met from the approved Planning budget 2016/17. City of Wolverhampton Council have also requested that any detailed proposals should consider the impacts on Wolverhampton in terms of highway and school place implications and should be consulted on such proposals. [ES/27022017/S]

5.0 Legal implications

5.1 As a neighbouring authority, South Staffordshire Council are required to work with the Council on the preparation of their Local Plan documents, under the “duty to cooperate”. The “duty to cooperate” in relation to planning of sustainable development was enacted by Section 110 of the Localism Act 2011 inserting a new Section 33A into Part 2 of the Planning and Compulsory Purchase Act 2004. The National Planning Practice Guide states that the duty co-operate places a legal duty on local planning authorities to engage

constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters.

- 5.2 The duty to cooperate is not a duty to agree. But local planning authorities should make every effort to secure the necessary cooperation on strategic cross boundary matters before they submit their Local Plans for examination. Local planning authorities must demonstrate how they have complied with the duty at the independent examination of their Local Plans. If a local planning authority cannot demonstrate that it has complied with the duty then the Local Plan will not be able to proceed further in examination. Local planning authorities will need to satisfy themselves about whether they have complied with the duty. As part of their consideration, local planning authorities will need to bear in mind that the cooperation should produce effective and deliverable policies on strategic cross boundary matters. [RB/28022017/X17B]

6.0 Equalities implications

- 6.1 A screening has been carried out for equalities implications and this concluded that a full Equality Analysis was not required for the recommendations of this report, as they do not involve a change to Council services, functions, policies or procedures.

7.0 Environmental implications

- 7.1 There are no direct environmental implications arising from this report.

8.0 Human resources implications

- 8.1 There are no human resources implications arising from this report.

9.0 Corporate landlord implications

- 9.1 There are no corporate landlord implications arising from this report.

10.0 Schedule of background papers

South Staffordshire Core Strategy – December 2012

Report to 25 July 2012 Cabinet: South Staffordshire Local Plan Update

Tettenhall Neighbourhood Plan - 2014

South Staffordshire Site Allocations Document (SAD) Issues and Options Consultation – March 2014

Report to 23 April 2014 Cabinet: South Staffordshire Site Allocations Document: Issues and Options Consultation

South Staffordshire Site Allocations Document (SAD) Issues and Options: Additional Sites Consultation – August 2014

Report to 1 October 2014 Cabinet: South Staffordshire Site Allocations Document (SAD) Issues and Options: Additional Sites Consultation

South Staffordshire Site Allocations Document (SAD) Preferred Options Consultation – December 2015

Report to 24 February 2016 Cabinet: South Staffordshire Site Allocations Document (SAD) - Preferred Options Consultation

South Staffordshire Site Allocations Document (SAD) Publication Consultation – January 2017

Staffordshire County Council ROF Featherstone Highway Improvement Consultation – January 2017