

Report title	Wolverhampton Response to South Staffordshire Local Plan Issues and Options Consultation	
Decision designation	AMBER	
Cabinet member with lead responsibility	Councillor John Reynolds City Economy	
Key decision	Yes	
In forward plan	Yes	
Wards affected	All Wards	
Accountable Director	Richard Lawrence, Director of Regeneration	
Originating service	Planning	
Accountable employee	Michele Ross	Lead Planning Manager (Sub-Regional Strategy)
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Report to be/has been considered by	Regeneration Leadership Team	6 November 2018
	Place Leadership Team	12 November 2018

Recommendations for decision:

The Cabinet is recommended to:

1. Approve the following principles as the basis of the Council's response to the South Staffordshire Local Plan Issues and Options consultation:
 - a. Support for the preferred housing growth option of local housing need plus 4,000 homes of Greater Birmingham and Black Country Housing Market Area need;
 - b. Support for a mix of spatial options which deliver a proportionate amount of housing on the edge of the Black Country in line with the Housing Market Area Strategic Growth Study areas of search, subject to the findings of the joint South Staffordshire and Black Country Green Belt Review and other evidence;
 - c. Support for the sites submitted by the Council to South Staffordshire as part of the "Call for Sites", as approved by Cabinet Resources Panel on 2 October 2018;
 - d. Support for the employment growth option to allocate additional employment land to help address unmet cross boundary employment land needs for the Black Country, in

locations which are the most accessible by a choice of means of transport to the Wolverhampton workforce;

- e. Request for acknowledgement that, if approved, the West Midlands Interchange application would contribute towards unmet Black Country need for employment land and logistics provision;
- f. Support for the existing Brinsford Strategic Park and Ride site allocation and request that this project and other supporting infrastructure which increases access to the rail network should be promoted in the new Plan;
- g. Request that the impact of developments on the wider transport network is assessed, and that developments minimise trip generation through all available mechanisms;
- h. Request that development links effectively to the strategic transport network and avoids excessive pressure on sensitive transport links.

1.0 Purpose

- 1.1 To summarise the content of the South Staffordshire Local Plan Issues and Options Consultation and the implications for Wolverhampton and to approve the principles for a City of Wolverhampton Council response to the consultation.

2.0 Background

- 2.1 The South Staffordshire Site Allocations Document (SAD), which allocates sites for housing and employment development up to 2028, was adopted in June 2018. The SAD included a commitment to carry out an immediate review and submit a new Local Plan for examination by 2021 which would address longer term development needs up to 2037, including those arising from the Greater Birmingham and Black Country Housing Market Area (HMA). The Local Plan will be supported by evidence prepared jointly with the Black Country authorities to support the Black Country Plan, including a Green Belt Review, which was commissioned in September 2018, and employment land evidence.
- 2.2 On 2 October 2018, Cabinet (Resources) Panel approved the submission of a number of Council-owned sites to South Staffordshire Council for development as part of the “Call for Sites” for the Local Plan.
- 2.3 South Staffordshire Council published an Issues and Options Consultation ([Weblink](#)) for the new Local Plan on 8 October 2018 with a consultation response deadline of 30 November 2018. South Staffordshire adjoins the north and west boundary of Wolverhampton, and it is important that the South Staffordshire Local Plan and the Black Country Plan are prepared in a consistent and complementary manner, building on a history of successful joint working.

3.0 Summary of the South Staffordshire Local Plan Issues and Options Consultation

- 3.1 The Issues and Options report explains that South Staffordshire’s housing need up to 2037 is 5,130 homes. Around 4,000 of this can be delivered on land committed, allocated or safeguarded through the SAD. It is acknowledged that there is also a need for the authority to accommodate part of the estimated 60,855 home shortfall in the HMA up to 2036, of which the majority originates in Birmingham and the Black Country.
- 3.2 Five housing growth options are put forward for consultation. The preferred option is to contribute 4,000 homes towards the HMA shortfall, based on the minimum capacity of the four areas of search identified for South Staffordshire in the HMA Strategic Growth Study. These are described as:
 - an urban extension north of Penkrige (1,500 homes);
 - an employment-led urban extension north of Wolverhampton around the i54 employment site (1,500 homes);
 - dispersed development north of Codsall / Bilbrook (500 homes); and
 - dispersed development on the western edge of Wolverhampton / Stourbridge (500 homes)

The other options propose contributing 0, 1,900, 12,000 or 20,000 homes respectively towards the shortfall.

- 3.3 In terms of employment land, the report states that South Staffordshire have a small surplus of land to meet their own needs but anticipate playing a role in delivering unmet needs from the Black Country – the amount of which will be subject to progress on the Black Country Plan. The report also notes that an application for a c.300 ha logistics site (West Midlands Interchange) at Four Ashes is currently being considered by the Secretary of State.
- 3.4 The report then goes on to set out six spatial distribution policy options for delivery of the preferred housing option and potential employment land requirements. These include increasing the average density of housing sites, expanding existing South Staffordshire settlements, small and large-scale urban extensions on the edge of the Black Country, and new freestanding settlements. Maps are provided showing the location of potential development sites submitted through the “Call for Sites” to date. These include sites within the HMA areas of search and a range of sites on the fringe of Wolverhampton. Given the scale of housing proposed, and the requirement to locate housing close to where need arises, it is likely that a combination of options will be required, including urban extensions to the Black Country.
- 3.5 It should be noted that the spatial policy options maps are indicative only and show the locations of all sites submitted for consideration to date, rather than preferred sites for development. The next stage of consultation – the Preferred Options – will propose specific sites for development, following completion of key evidence.

4.0 Implications for Wolverhampton and principles for a response

- 4.1 The preferred housing growth option would represent a substantial 30% increase in housing completions compared to recent trends. It is unlikely that higher growth options would be sustainable. Given the proximity of the Black Country to South Staffordshire, it is reasonable to claim all of the 4,000 homes being offered by South Staffordshire towards meeting Black Country housing needs. This would be a welcome contribution towards the estimated 22,000 home shortfall which the Black Country Plan must address.
- 4.2 The potential for South Staffordshire to provide additional, high quality employment land to meet the needs of the Black Country is also welcomed, building on the successful delivery of the i54 site. To help meet the employment needs of Wolverhampton it is important that such sites have high levels of accessibility to the Wolverhampton workforce.
- 4.3 A number of the spatial policy options could involve significant housing and / or employment development close to the boundary of Wolverhampton. This could have implications in terms of infrastructure such as transport, education and open space, and

could impact on the environmental quality and amenity of areas at the edge of Wolverhampton. Any developments would need to be carefully located and planned, therefore it is vital that close joint working on all of the relevant issues continues throughout the Plan preparation process.

- 4.4 In terms of transport infrastructure implications, close engagement will be required with Staffordshire County Council. As the gateway to the West Midlands, it is critical that the impact on the transport network of trip generation is assessed not just in the immediate vicinity of development but also in the corridors giving access into the urban area. Developments should minimise trip generation, through local provision of services, high-quality multi-modal connectivity and maximising opportunities arising from future transport developments e.g. growth in electric vehicle usage. Good access to the rail network and provision of supporting infrastructure such as sufficient park and ride capacity are essential. Any impact of the implementation of HS2 should be taken into account and high-quality pedestrian and cycling infrastructure should be incorporated for local journeys and first / last mile links.
- 4.5 Development should link effectively to the strategic transport network, in particular high-capacity corridors such as the A449 and the proposed M6 link road, avoiding excessive pressure on sensitive transport links such as the A454, the urban A460 and non-strategic routes. Where transport link improvements are required to mitigate trip generation impacts, appropriate funding mechanisms should be secured.
- 4.6 Therefore, it is proposed that the following principles form the basis for a City of Wolverhampton Council response to the consultation:
- Support for the preferred housing growth option of local housing need plus 4,000 homes of HMA need;
 - Support for a mix of spatial options which deliver a proportionate amount of housing on the edge of the Black Country in line with the HMA Strategic Growth Study areas of search, subject to the findings of the joint South Staffordshire and Black Country Green Belt Review and other evidence;
 - Support for the sites submitted by the Council to South Staffordshire as part of the “Call for Sites”, as approved by Cabinet Resources Panel on 2 October 2018;
 - Support for the employment growth option to allocate additional employment land to help address unmet cross boundary employment land needs for the Black Country, in locations which are the most accessible by a choice of means of transport to the Wolverhampton workforce;
 - Request for acknowledgement that, if approved, the West Midlands Interchange application would contribute towards unmet Black Country need for employment land and logistics provision;

- Support for the existing Brinsford Strategic Park and Ride site allocation and request that this project and other supporting infrastructure which increases access to the rail network should be promoted in the new Plan;
- Request that the impact of developments on the wider transport network is assessed, and that developments minimise trip generation through all available mechanisms.
- Request that development links effectively to the strategic transport network and avoids excessive pressure on sensitive transport links.

5.0 Evaluation of alternative options

5.1 The alternative option is for the Council not to respond to the consultation. This option is not viable, given the implications of the Local Plan for Wolverhampton could be significant.

6.0 Reasons for decision

6.1 The South Staffordshire Local Plan could have significant implications for Wolverhampton therefore it is important that the Council submits a response to each stage of consultation.

7.0 Financial implications

7.1 There are no immediate financial implications arising from this report. Any staffing costs associated with responding to the consultation will be met from the approved Planning budget 2018-2019. At future stages in the Local Plan process implications may arise for infrastructure provision in Wolverhampton, which will be addressed in future reports.
[ES/22112018/B]

8.0 Legal implications

- 8.1 As a neighbouring authority, South Staffordshire Council is 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 Guidance states that the duty to 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.
- 8.2 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.

[TS/19112018/R]

9.0 Equalities implications

9.1 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.

10.0 Environmental implications

10.1 There are no direct environmental implications arising from this report.

11.0 Human resources implications

11.1 There are no human resources implications arising from this report.

12.0 Corporate landlord implications

12.1 On 2 October 2018, Cabinet (Resources) Panel approved the submission of a number of Council-owned sites to South Staffordshire Council for development as part of the “Call for Sites” for the Local Plan. This report recommends that these sites are promoted for development through the Local Plan process.

13.0 Health and Wellbeing implications

13.1 There are no health and wellbeing implications arising from this report.

14.0 Schedule of background papers

Cabinet (Resources) Panel, 2 October 2018 – [‘Black Country and South Staffordshire Plan Reviews – Call for Sites Submissions’](#)

South Staffordshire Site Allocations Document – June 2018