

CITY OF WOLVERHAMPTON COUNCIL	Cabinet 22 January 2019
--	--

Report title	South Staffordshire Local Plan Spatial Housing Strategy and Infrastructure Delivery Consultation	
Decision designation	AMBER	
Cabinet member with lead responsibility	Councillor Harman Banger 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)
	Tel	01902 554038
	Email	Michele.ross@wolverhampton.gov.uk
Report has been considered by	Strategic Executive Board	3 December 2019

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 Spatial Housing Strategy and Infrastructure Delivery consultation:
 - a. Support for the preferred housing growth option of local housing need plus 4,000 homes to meet wider Black Country and Birmingham Housing Market Area need;
 - b. Provision of detailed evidence to support the case that the Black Country is unlikely to be able to meet its own housing need up to 2038, and that the full 4,000 homes should be specifically allocated to meet Black Country needs;

- c. Recognition of the approach used in the selection of the preferred spatial housing option G and the benefits of developing a draft Infrastructure Delivery Plan for this option. It is important that the spatial housing option selected:
 - i. makes full use of brownfield and urban site options to minimise green belt release;
 - ii. ensures that sites selected for development are carefully located and planned to avoid areas of greatest environmental sensitivity and green belt harm, and to minimise impacts on infrastructure;
 - iii. ensures that any urban extensions are subject to an integrated health impact assessment; provide all necessary local shops, community and health facilities and primary school places on-site; provide secondary school places in appropriate locations; and address wider health service implications, to meet the needs of new residents and avoid impacts on infrastructure in neighbouring authorities;
 - iv. ensures that the infrastructure needs of smaller sites on the South Staffordshire boundary can be met without putting additional pressure on infrastructure in neighbouring authorities.
- d. Request that the impact of developments on the wider transport network is assessed, that development links effectively to the strategic transport network and avoids excessive pressure on sensitive transport links, and that developments minimise trip generation through all available mechanisms;
- e. Support for use of the very high green belt harm rating to prioritise site selection, whilst also suggesting that consideration is given to making use of landscape sensitivity ratings;
- 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. 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;
- h. Acknowledgment that the Council and South Staffordshire Council have been working together constructively on planning issues of mutual interest and request that close joint working on all relevant planning issues, particularly development proposals and infrastructure and delivery, continues throughout the Plan preparation process and is strengthened through the creation of a formal liaison group to regularly consider emerging proposals and their cross-boundary implications.

1.0 Purpose

- 1.1 To summarise the content of the South Staffordshire Local Plan Consultation and seek approval for principles for a City of Wolverhampton Council (CWC) response.

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 Assessment, which was commissioned in September 2018.
- 2.2 South Staffordshire Council published a Local Plan review Issues and Options consultation at the end of 2018. This put forward five housing growth options, with a preferred option to meet local housing needs and also contribute 4,000 homes towards the Greater Birmingham and Black Country Housing Market Area (HMA) shortfall, based on the minimum capacity of the four areas of search identified for South Staffordshire in the HMA Strategic Growth Study. The consultation also set out six spatial distribution policy options for delivery of the preferred housing option and potential employment land requirements.
- 2.3 The CWC and Black Country responses to the consultation supported the preferred option and a mix of spatial options which would 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 Green Belt Assessment and other evidence.
- 2.4 South Staffordshire Council published a Spatial Housing Strategy and Infrastructure Delivery consultation ([Weblink](#)) for the new Local Plan on 17 October with a consultation response deadline of 12 December 2019. The Green Belt Assessment reports covering the Souths Staffordshire area have been published alongside this consultation. Employment growth will be addressed in a Preferred Options Plan consultation in summer 2020, followed by publication in Winter 2020/2021.

3.0 Summary of the Consultation

- 3.1 Following the Issues and Options consultation South Staffordshire Council remain committed to the housing growth option which contributes up to 4,000 homes towards the HMA shortfall and acknowledge that a mix of spatial approaches will be needed to deliver this.

- 3.2 The report first states that all safeguarded land in the SAD will be allocated for housing, which includes land around settlements such as Codsall / Bilbrook and Perton. The report then sets out broad spatial options for 4,984 further homes which do not relate to specific sites. The preferred spatial housing option is Option G: Infrastructure-led development with a garden village area of search beyond the plan period. Appendix 1 sets out the details of Option G.
- 3.3 Option G includes:
- 221 additional homes at Perton and 566 additional homes at Codsall/Bilbrook;
 - around 1,200 homes west of ROF Featherstone Strategic Employment Site (north of M54) as part of an employment-led development;
 - around 1,200 homes in the form of a single urban extension on the northern edge of Wolverhampton / Walsall (shown as orange hatching on the Appendix 1 map);
 - around 750 homes on dispersed sites along the western edge of Wolverhampton / Dudley (shown as purple hatching);
 - Beyond the Plan period (up to 2037), an area of search for a new settlement which runs north and south of Penkridge.
- 3.4 Option G broadly aligns with the HMA Strategic Growth Study areas of search and is supported by an Infrastructure Delivery Plan which addresses a range of infrastructure including schools, health facilities, community services, open space and retail. This Plan states that any urban extension to the Black Country would be expected to deliver infrastructure on site, creating communities with a high degree of self-containment in terms of local shops, community facilities and primary schools. Smaller sites which could not sustain on site infrastructure would be located within walking distance of a good range of services and facilities in the neighbouring urban area.
- 3.5 A number of emerging infrastructure opportunities are identified. These include a First School to serve Codsall / Bilbrook; the delivery of road access to ROF Featherstone Strategic Employment Site across the west coast mainline to the A449; Brinsford Strategic Park and Ride (subject to a feasibility study); a Country Park at Perton; and highway improvements around Perton including the A41 junction that would alleviate existing congestion. The need for further investigation into a number of infrastructure concerns, including school place provision, is identified.
- 3.6 Although no specific sites are proposed, the consultation sets out detailed site selection criteria. These cover a range of planning issues, including impact on the historic environment, landscape sensitivity, natural environment constraints, flood risk, access issues and loss of open space. It is proposed to weigh these factors together and make a balanced judgement as to which sites are selected for development. However, two specific approaches are proposed towards site selection. The consultation proposes to only release sites of at least 0.28ha in size and to use the Green Belt study to inform site

selection by avoiding allocations in areas where development could cause “very high harm” to the green belt. An exception to this would be west of ROF Featherstone, where “very high harm” in this area is considered to be outweighed by the unique infrastructure benefits offered to deliver a brownfield strategic employment site and a park and ride facility. Appendix 1 shows maps of very high harm areas around the fringe of the Black Country.

4.0 Implications for Wolverhampton and Proposed Principles for a Wolverhampton Consultation Response

- 4.1 It is welcome that South Staffordshire are still committed to offering 4,000 homes to meet the shortfall in the wider HMA. Given the proximity of the Black Country to South Staffordshire and strong migration and commuting links, 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 significant contribution towards the estimated shortfall of at least 23,000 homes which the emerging Black Country Plan must address.
- 4.2 Migration and commuting evidence can be provided to support the strong links between South Staffordshire and the Black Country. The publication of key evidence supporting the Black Country Plan review during November also supports the case that there is a significant housing shortfall in the Black Country, emerging before 2031, which cannot be met in the urban area and that there are a range of constraints affecting the Black Country Green Belt. The HMA Strategic Growth Study also confirms that, at a strategic level, the majority of the Black Country Green Belt makes a principal contribution towards green belt purposes, and its capacity to accommodate large scale development is limited.
- 4.3 It is also appropriate to use market deliverability to argue the case. In the case of the Birmingham Plan, the Peter Brett Associates (PBA) Delivery Study¹ concluded that market deliverability placed significant constraints on the amount of housing which could be delivered in the Birmingham Green Belt up to 2031. These constraints reduced the actual capacity of the urban extension identified in the Plan consultation from 10,000 to 5,000 homes, over the 15 year period of the Plan². This assumption was based on a strong housing market recovery scenario in one of the strongest housing markets areas in the West Midlands.
- 4.4 As the Black Country Green Belt is located primarily in Walsall and, to a lesser extent, in Dudley, these are the two main housing market areas for delivery of housing, with only small amounts of housing potential in Wolverhampton and Sandwell. Therefore, based on a scenario that there was sufficient unconstrained capacity identified in the Black Country Green Belt, a Delivery Study based on similar principles to that completed for Birmingham may well reasonably conclude that these two nominal housing market areas

¹ https://www.birmingham.gov.uk/downloads/file/1750/pg3_housing_delivery_on_green_belt_options_2013pdf

²

https://www.birmingham.gov.uk/downloads/file/1211/strategic_housing_market_assessment_2013_housing_targets_2011_to_2031_technical_paper

could only be expected to deliver up to 5,000 homes each over the 15-year Plan period, leaving a significant shortfall to be met in neighbouring authorities.

- 4.5 A number of the spatial housing options could involve significant housing development close to the boundary of Wolverhampton. This could have implications in terms of infrastructure such as transport, education, health services 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.
- 4.6 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.
- 4.7 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.
- 4.8 The preferred spatial housing Option G includes the provision of mixed use development at ROF Featherstone which will help meet the employment land needs of the Black Country and deliver Brinsford Strategic Park and Ride site which will increase access to the rail network. This Option also proposes around 1,950 homes directly on the edge of the Black Country, which is in accordance with the case that these homes will meet Black Country needs.
- 4.9 Although specific sites selected could adjoin Wolverhampton and raise cross-boundary infrastructure issues, the report makes clear that Option G is infrastructure-led, having specific regard to infrastructure opportunities such as school place expansions. It is particularly of note that the urban extension proposed to the north of the Black Country would be expected to deliver infrastructure on site, creating communities with a high degree of self-containment in terms of local shops, community facilities and primary schools, therefore minimising impacts on existing local communities.

- 4.10 The Infrastructure Delivery Plan sets out how various infrastructure needs are in the process of being assessed and how these may be addressed. This is reflected in the site selection criteria. The site selection criteria cover the range of planning issues that should be taken into account when selecting sites, including making full use of brownfield site options first, and are broadly in line with the emerging site selection methodology for the Black Country Plan.
- 4.11 Therefore, it is proposed that the principles for a CWC consultation response are developed based on:
- a. Support for the preferred housing growth option of local housing need plus 4,000 homes to meet wider Black Country and Birmingham Housing Market Area need;
 - b. Provision of detailed evidence to support the case that the Black Country is unlikely to be able to meet its own housing need up to 2038, and that the full 4,000 homes should be specifically allocated to meet Black Country needs;
 - c. Recognition of the approach used in the selection of the preferred spatial housing option G and the benefits of developing a draft Infrastructure Delivery Plan for this option. It is important that the spatial housing option selected:
 - i. makes full use of brownfield and urban site options to minimise green belt release;
 - ii. ensures that sites selected for development are carefully located and planned to avoid areas of greatest environmental sensitivity and green belt harm, and to minimise impacts on infrastructure;
 - iii. ensures that any urban extensions are subject to an integrated health impact assessment; provide all necessary local shops, community and health facilities and primary school places on-site; provide secondary school places in appropriate locations; and address wider health service implications, to meet the needs of new residents and avoid impacts on infrastructure in neighbouring authorities;
 - iv. ensures that the infrastructure needs of smaller sites on the South Staffordshire boundary can be met without putting additional pressure on infrastructure in neighbouring authorities.
 - d. Request that the impact of developments on the wider transport network is assessed, that development links effectively to the strategic transport network and avoids excessive pressure on sensitive transport links, and that developments minimise trip generation through all available mechanisms;
 - e. Support for use of the very high green belt harm rating to prioritise site selection, whilst also suggesting that consideration is given to making use of landscape sensitivity ratings;

- 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. 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;
- h. Acknowledgment that the Council and South Staffordshire Council have been working together constructively on planning issues of mutual interest and request that close joint working on all relevant planning issues, particularly development proposals and infrastructure and delivery, continues throughout the Plan preparation process and is strengthened through the creation of a formal liaison group to regularly consider emerging proposals and their cross-boundary implications.

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 2019-20. At future stages in the Local Plan process implications may arise for infrastructure provision in Wolverhampton, which will be addressed in future reports.
[SM/31102019/Q]

8.0 Legal implications

- 8.1 As a neighbouring authority, South Staffordshire Council are required to work with the Council on the preparation of their Local Plan documents. Pursuant to Section 110 of the Localism Act 2011 the Council’s planning authority has a legal “duty to cooperate”. This requires the Council 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 otherwise they will not be able to

proceed further in examination. As part of its consideration, local planning authorities will need to bear in mind that the cooperation should produce effective and deliverable policies on strategic cross boundary matters as set out in the body of this report.
[JA/311019/B]

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 Climate Change and Environmental implications

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

11.0 Health and Wellbeing Implications

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

12.0 Human resources implications

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

13.0 Corporate landlord implications

13.1 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.

14.0 Schedule of background papers

14.1 South Staffordshire Spatial Housing Strategy and Infrastructure Delivery Consultation 2019

14.2 Report to 12 December 2018 Cabinet: [Wolverhampton Response to South Staffordshire Local Plan Issues and Options Consultation](#)

14.3 Report to 2 October 2018 Cabinet (Resources) Panel: [Black Country and South Staffordshire Plan Reviews – Call for Sites Submissions](#)

14.4 [Minutes of Vibrant and Sustainable City Scrutiny Panel 7 November 2019](#)

15.0 Appendices

15.1 *Appendix 1 – Extracts from South Staffordshire Local Plan Spatial Housing Strategy*