

The Local Plan Strategy

The Local Plan for South Staffordshire

- 6.1 The Local Plan for South Staffordshire comprises two documents. An adopted Core Strategy which sets out the vision, objectives and planning framework for development in South Staffordshire; and the Site Allocations Document (SAD) which seeks to deliver the adopted Core Strategy.
- 6.2 The Core Strategy was adopted in December 2012, post NPPF; and one year after the adoption of the neighbouring Black Country Core Strategy. The Black Country Core Strategy, the fundamental aim of which is to deliver urban regeneration, has a close inter-relationship with South Staffordshire's Core Strategy. The SAD is a 'Tier 2' plan, and therefore seeks to deliver the Core Strategy. A Monitoring Framework for the SAD is also included in Appendix 4, which is in addition to the Core Strategy Monitoring Framework.
- 6.3 South Staffordshire's Core Strategy is based on delivering new homes to meet local needs only, using a settlement hierarchy approach. It was developed to deliver small scale local growth for our communities and rural regeneration, in a sustainable way, and to do so in a way that would minimise out migration from the Black Country Major Urban Area (MUA).

Core Strategy Delivery and Plan Flexibility

- 6.4 The SAD is not considered to be the appropriate point at which to revise the housing target established in the adopted Core Strategy. The SAD is seeking to deliver the Core Strategy, and Policy SAD1: Local Plan Review offers certainty that this matter will be addressed when the Plan is reviewed. Therefore, it would be inappropriate to revise the District's housing or Gypsy and Traveller pitch requirements within the SAD, the scope of which is simply to give effect to the existing adopted policies in the Core Strategy.
- 6.5 Housing requirements in the adopted Core Strategy are minimum figures. In certain circumstances, for example where community benefit is being delivered, or to recognise defensible boundaries, and maximise the efficient use of land, some allocated sites in the SAD exceed minimum figures. Sites may also deliver slightly higher levels of development on the ground dependent on layout, open spaces and housing mix.
- 6.6 The Core Strategy also requires the SAD to identify sufficient additional land to meet longer term development needs in future Local Plan documents – this is known as 'Safeguarded Land'. The SAD identifies safeguarded land in our Main and Local Services Villages in the settlement hierarchy, in accordance with the Core Strategy. As part of a Local Plan review the sites identified as safeguarded land in this SAD will be considered for release for housing development in the next plan period.

Local Plan Review

- 6.7 The Localism Act 2011, and specifically Section 110, introduced a legal requirement known as Duty to Co-operate (DtC). The DtC is important when issues arise that cross the boundaries of local authority areas. Dialogue between neighbouring local authorities should be constructive, active and on-going to ensure that it can be demonstrated that plans have been positively prepared, having regard to cross boundary issues of strategic importance. Further information on the Duty to Co-operate can be found in paragraphs 4.4-4.8.
- 6.8 Through a Local Plan review, changes to the spatial strategy in the adopted Core Strategy may be necessary in response to emerging evidence, or to reflect cross boundary issues of strategic importance under the DtC. Whilst the SAD is not considered to be the appropriate place at which to revise the strategic approach established in the adopted Core Strategy, it is considered necessary now, to provide a narrative on significant cross boundary issues that have arisen since the Core Strategy was adopted in December 2012.

Greater Birmingham Housing Market Area (GBHMA)

- 6.9 There is a primary Housing Market Area (HMA) comprising Birmingham, the Black Country and nine neighbouring local authorities defined in a Strategic Housing Needs Study (SHNS); commissioned by the Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP) and the Black Country Authorities. South Staffordshire is one of the nine local authorities within the HMA, together with Cannock Chase, Lichfield, Tamworth, North Warwickshire, Stratford-upon-Avon, Solihull, Bromsgrove and Redditch.
- 6.10 ~~The SHNS Stage 3 Report (2015) identified a demographic need for 207,100 additional homes across the whole HMA between 2011 and 2031 with a shortfall in supply of approximately 37,500 homes (18% of the need). The GBHMA shortfall is being recalculated in the light of more up to date information.~~The adopted Birmingham Development Plan (Policy PG1) identifies an unmet housing need of 37,900 dwellings up to 2031, for which provision is to be made elsewhere within the GBHMA. Furthermore, since this shortfall was identified, a further additional 22,000 dwelling unmet need has been identified through early stages of the review of the Black Country Core Strategy. For this reason, the distribution of the unmet housing need across the HMA is yet to be agreed. South Staffordshire Council is working positively towards a Memorandum of Understanding (MoU) or Statement of Common Ground (SoCG) with all local planning authorities within the GBHMA.
- 6.11 To assist discussions between the HMA authorities with regard to the apportionment of housing needs, a Strategic Growth Study is being prepared across all fourteen GBHMA authorities. This examines strategic locations for housing growth which could assist in meeting the identified HMA unmet needs across the GBHMA, having regard to a high-level Green Belt Review, assessment of infrastructure capacity, sustainability criteria

and deliverability assessments. The study re-examines the potential urban capacity of GBHMA authorities and options for strategic development past the Green Belt, and ultimately sets out options for strategic growth locations to be tested through the Local Plan Review. This provides a consistent evidence base upon which a future MoU/SoCG apportioning housing growth can be based.

6.12 In addition to this, South Staffordshire Council and the Black Country authorities have agreed to prepare a joint Green Belt Review to assess, in further detail, the capacity of the Green Belt across the five authorities. This may provide a basis for identifying future housing and employment sites, where exceptional circumstances demonstrate these are required. Given the changing nature of cross-boundary housing growth pressures, additional evidence may be required to review the District's housing capacity. For example, an update of the evidence base in respect of the Cannock Chase Special Area of Conservation (SAC), including mitigation measures and assessment of existing rural settlement's' infrastructure capacity, and services and facilities. This evidence will inform the framework for a new spatial strategy- which seeks to meet the District's own objectively assessed housing needs and, subject to discussion with other local authorities,s could potentially meet a proportionate contribution towards unmet housing needs from the wider housing market area.

Core Strategy delivery and plan flexibility

6.13 It is because of this issue, of evidenced unmet housing needs across the GBHMA, that an early Local Plan Review is being triggered by Policy SAD1 – Local Plan Review. The aim is to ~~adopt~~ prepare a new Local Plan for South Staffordshire to be submitted for examination by the end of 2021 ~~by 2022~~ – and this will mean that South Staffordshire's contribution towards unmet housing needs across the GBHMA can be addressed in a timely manner in order to secure the delivery of these new homes by 2031.

6.14 It is difficult to arrive at a precise figure now within the context of this Tier 2 Plan (the SAD). There is not the flexibility to enable the allocation of additional homes, now, to meet a proportion of the unmet need arising in the GBHMA. However, we recognise that continued uncertainty may not be helpful to BCC in seeking to monitor the provision of unmet housing needs across the GBHMA by 2031. Safeguarded land identifies sites that can be considered ~~'reserve sites'—that could come forward~~ through the Local Plan review process in order to meet housing shortfalls across the GBHMA, including South Staffordshire's own housing needs.

6.15 Similarly, regard will need to be had in the South Staffordshire Local Plan review to the economic needs of South Staffordshire, and regard to the cross boundary Functional Economic Market Area (FEMA) Similarly, the South Staffordshire Local Plan review will need to have regard to the economic needs of South Staffordshire. These will be taken into account by means of a comprehensive Economic Development Needs Assessment (EDNA) which will review employment land need and supply. South Staffordshire has also historically worked positively with neighbouring

authorities to understand, and plan for, justified economic needs; and will continue to do so in the plan review. For example, the Black Country authorities' 2017 Economic Development Needs Assessment Stage 1 Report identifies South Staffordshire as an area with strong economic links to the Black Country Functional Economic Market Area. Where required, and justified by robust evidence, South Staffordshire will continue to work constructively and pro-actively with the Black Country authorities to consider the District's role in meeting wider employment needs through the Duty to Co-operate. For further information on economic development, see Chapter 9.

Local Plan Reviews – South Staffordshire and the Black Country

- 6.16 Our inter-relationship with the Black Country is important – and this is explained in detail in the adopted Core Strategy. Our timetable for local plan preparation will continue to be aligned closely with local plan preparation in the Black Country. Policy SAD1 Local Plan Review will assist in cementing the continued close alignment between our emerging local plan reviews.
- 6.17 The early review of the South Staffordshire Local Plan ~~will require scoping reports to establish the extent of the review, and the required evidence base. This~~ commenced in 2016 with a joint Strategic Housing Market Assessment (SHMA) and there will also be a Strategic Green Belt Review in 2018 (as set out above). SHMAs are an important part of the evidence base that will underpin the emerging local plan reviews for South Staffordshire and the Black Country. SHMAs require detailed analysis that would not be appropriate for the geography of the wider GBHMA. For this reason the Black Country and South Staffordshire Sub Housing Market Area is chosen as the geography for this important piece of evidence. The Joint SHMA ~~will~~ has considered ed what our full objectively assessed housing needs are, including Gypsy, Traveller and Travelling Showperson pitches/plots, and identifies the scale and mix of housing and the range of tenures that the local population is likely to need in the future. Housing and employment needs will be reviewed as part of the local plan review scoping and evidence gathering which commenced in 2016, and will be subject to consultation as part of the new plan preparation process.

Policy SAD1: Local Plan Review

South Staffordshire Council shall carry out an early review of the Local Plan that will be submitted by the end of 2021. This will be a comprehensive review of the Local Plan for South Staffordshire that will consider the need for additional growth and plan appropriately for this. This plan will review, as a minimum, the following matters, which are based upon known strategic issues affecting the District at this point in time;

- South Staffordshire's own objectively assessed housing need and the potential for housing supply within the District (including existing safeguarded land identified through the Site Allocations Document) to meet this need.
- The potential role of housing supply options within the District to meet unmet cross boundary needs from the wider Greater Birmingham Housing Market Area (GBHMA).
- Employment land requirements for South Staffordshire, as identified through a comprehensive Economic Development Needs Assessment (EDNA)
- South Staffordshire's potential role in meeting wider unmet employment needs through the Duty to Co-operate.
- The appropriateness of the existing settlement hierarchy and the strategic distribution of growth in light of new housing and employment needs.
- The need for further additional safeguarded housing and employment land for longer term development needs.
- Gypsy, Traveller and Travelling Showpeople provision.
- A comprehensive Green Belt Review undertaken jointly with the Black Country authorities, to inform any further Green Belt release to accommodate new development within the District.

6.18 Policy SAD1 as set out above responds to the known cross boundary evidence of unmet development needs, including unmet housing needs across the Greater Birmingham Housing Market Area (GBHMA) – which includes the Black Country and 9 other neighbouring authorities (including South Staffordshire).

6.19 The Council will continue to work positively towards a Memorandum of Understanding (MoU) or Statement of Common Ground (SoCG) with all local planning authorities across the GBHMA. However, it may be the case that the GBHMA authorities fail to agree a MoU or SoCG setting the apportionment of housing growth across the HMA in advance of the publication draft of the Local Plan Review, which is anticipated before the end of 2020. If this is the case, the Council will consider providing a proportionate contribution to unmet cross boundary development needs as informed by all available evidence at that point in time. This will ensure the timely preparation of the Local Plan Review.

6.20 The SAD proposes to update a number of Core Strategy policies in order to incorporate Site Allocations proposals. All proposed policies will continue the strategic approach set out in the adopted Core Strategy, and must be in accordance with those policies. It is important that development proposals should be consistent with other local planning policies. A Monitoring Framework is also included in Appendix 4, which is in addition to the Core Strategy Monitoring Framework.

SAD Policy	Core Strategy Policy Links	Proposal	Why?
SAD1: Local Plan Review	N/A	Local Plan Review agreement.	To recognise the cross boundary issues emerging within the GBHMA and FEMA <u>and any other needs identified through the Duty to Co-operate, and alongside the potential for</u> additional housing and employment land <u>to meet the needs of</u> within South Staffordshire
SAD2: The Housing Allocations	Core Policy CP6: Housing Delivery	A policy setting out all the housing sites proposed for allocation.	To allocate land for housing to meet the Core Strategy plan requirements.
SAD3: Safeguarded Land for Longer Term Development Needs	GB2: Land Safeguarded for Longer Term Needs	A policy setting out all the housing sites proposed for safeguarding.	Safeguard land for longer term development needs to meet the Core Strategy plan requirements.
SAD4: Gypsy and Traveller Pitch Provision	H6: Gypsies, Travellers and Travelling Showpeople	A policy setting out all the Gypsy and Traveller pitches proposed for allocation.	Allocate land for Gypsy and Traveller pitches to meet the Core Strategy plan requirements.
SAD5: Employment Land Allocations	Core Policy (CP)7: Employment and Economic Development	A policy setting out all the employment land proposed for allocation.	Allocate land for employment to meet the evidenced requirements.
SAD6: Green Belt, Open Countryside and Development Boundary Amendments	GB1: Development in the Green Belt; and OC1: Development in the Open Countryside Beyond the West Midlands Green Belt	A policy setting out the proposed Green Belt, Open Countryside and Development boundary amendments.	Amend the development boundaries to accommodate the housing and employment sites proposed for allocation, and to recognise revised development boundaries.
SAD7: Open Space Standards	Core Policy (CP) 14: Open Space, Sport and Recreation.	A policy setting out the proposed Open Space Standards for new	Updated evidence in the Open Space Audit and Strategy 2014 set

	Delete unimplemented Public Open Space proposals former SSLP 1996 Policy R6	development.	out new requirements.
SAD8: Hatherton Canal Restoration Project	EV3: Canals and Canalside Development	A policy seeking to protect the restoration route of the Hatherton Branch Canal.	To assist in the restoration initiative.
SAD9: Key Development Requirements	All policies	A policy setting out the general detailed requirements that will be needed to support planning applications.	To assist in timely decision making.