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ASSESSMENT OF HOUSING PROPOSALS: ESSINGTON, LINTHOUSE LANE

For Essington Parish Council

Gerald Kells

December 2021

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## 1. Introduction

I was asked by the Essington Parish Council to review the housing need and supply situation in South Staffordshire in relation to the proposed Local Plan allocations by including the need for additional housing to meet wider needs in the Black Country.

I was asked to specifically appraise the broad justification for releasing land North of Linthouse Lane to provide 1972 houses on the edge of Wolverhampton (Site 486c in the Plan) of which 1200 are anticipated to come forward within the current plan period. I undertook a site visit on 1 December and was able to see much of the site and observe it from various surrounding locations, as well as the nearby Wood End Lane site proposed in the Black Country Plan.

As well as looking at the 2021 Consultation Plan, I have also taken into consideration the most recent Strategic Housing and Employment Land Availability Assessment (SHELAA 2021) as well as the landscape, historic and Green Belt Assessment undertaken to support the plan and the 2019 Strategic Housing Strategy and Infrastructure Delivery Report which underpins the choice of Option G for housing delivery which has been adopted into this plan<sup>1</sup>.

I have further taken account of the Development Vision for the site provided by Pegasus for Taylor Wimpey in November 2018, as well as the previous submission to the Options and Issues stage of the Black Country Plan by Neil Cox for Pegasus in 2017. I note that the Vision assumes 2,500 homes could be delivered on the site and also includes a further parcel of land North of the site and adjacent to Wood End Road which is not currently designated in the Plan.

I have taken account (with their permission) of previous work undertaken for the Campaign to Protect Rural England (West Midlands Regional Group) to assess housing need and supply in Birmingham and the Black Country and those reports are included as Appendices 1 and 2.

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<sup>1</sup> Documents at <https://www.sstaffs.gov.uk/planning/the-evidence-base.cfm>

## 2. Summary Findings

Below is a summary of my findings in this report, which suggest:

1. that the housing numbers in South Staffordshire, particularly the uplift of 4,000 to meet Black Country need is not justified and
2. that, for this reason and wider sustainability reasons, the exceptional circumstances given for the removal of Site on Linthouse Lane from the Green Belt do not exist.

### a. Housing Numbers

3. The justification for the housing numbers proposed in South Staffordshire relies on 4,000 from overspill from the Black Country that is untested. Without them no new allocations are needed.
4. The Government's arbitrary 35% uplift of housing in Wolverhampton is being added to general housing need when it should be targeted at brown-field regeneration.
5. The level of housing supply both in the Black Country (and wider conurbation) and in South Staffordshire is being under-estimated. In the case of the Black Country this could amount to over 5,000 homes and in South Staffordshire another 1,000 homes from windfall sites.
6. Accelerated changes to retail and office provision, particularly in centres following COVID may increase the housing land available in the Black Country.
7. Even if this level of housing is required from the Black Country South Staffordshire is overproviding by 1153 homes.

### b. Sustainability of Site 486c

8. I do not consider there is a need to allocate this site to meet either South Staffordshire's need or need emerging in the Black Country.
9. Although the site is next to the Urban Area, I am concerned that in practice it may be very car dependent. As well as the loss of good quality agricultural land I would be particularly concerned about the impact of additional traffic in the local area, the detrimental impact on the local landscape and the impact on public access to the countryside, both the immediate impact and as part of a network of Public Rights of Way.
10. I would also be concerned about the delivery of key aspects of the site which are needed to ensure it provides adequate local services, notably the hub proposal. Some aspects of the policy, such as provision of sustainable transport infrastructure may also prove to be too vague to ensure they provide what is actually needed.

11. There are several issues, such as biodiversity and flooding where additional expert advice may assist the Parish Council.

Overall, I do not consider the 'exceptional circumstances' required to remove the site from Green Belt have been demonstrated.

My report considers:

- housing need and supply in South Staffordshire and the Black Country and Birmingham,
- the implications of the Strategic Housing Market Assessment (SHMA) for South Staffordshire,
- the justification for the distribution of housing in the plan,
- specific site issues on site 486c (Linthouse Lane)

My report also includes some suggestions for comments in response to the local plan questions, although other work, including the ecological and flooding reports by local residents may also be used to inform the answers to those questions.

### 3. Housing Need and Supply

#### a. Need in South Staffordshire

The local housing need for a local authority is established through the demographic household projections of the Office for National Statistics. The Government then requires the authority to apply a Standard Methodology which includes an additional uplift based on the affordability of the area as measured by the ratio of median house prices and wages.

The most recent ONS Housing Projections are for 2018<sup>2</sup>. However, both these and the previous ONS2016 Housing Projections are considerably lower nationally than the ONS 2014 Projections so the Government insists on Councils continuing to use the 2014 Projections even though there is good reason to believe that the more conservative estimates both of population growth and household growth in ONS2016 and ONS2018 are more likely to be correct. This impacts little on South Staffordshire itself but severely on both Birmingham and the Black Country.

These, themselves, do not (using the Standard Methodology) meet the overall politically-driven national target of 300,000 dwellings per annum so the twenty largest cities have a further 35% added to their total including Birmingham and Wolverhampton which I discuss further on.

In the case of South Staffordshire itself the difference between the Projections is not very significant. The ONS2016 and ONS2018 projections would be higher but would exceed the Government's cap on 40% increase above the existing plan.

The results are set down in Table 1. This suggests that the local plan figure for South Staffordshire itself is robust and because of the high affordability uplift represents a figure significantly higher than the base-line demographic need (25% or 816 dwellings).

The Plan uses the ONS2014 figure, then adds a further 750 based on delivery in the period 2018-2021, giving a total of 4881 for housing need within South Staffordshire.

Notably the 2020 Strategic Housing Market Assessment (SHMA Para 5.4) assumes the use of the 254 2018ONS figure, not the Government's preferred figure of 245, but admits that as this is above the demographic need-based figure of 209, saying: '*If these 254 homes are built, the population will be larger than projected.*' In other words, even the Standard Methodology figure implies South Staffordshire will accommodate growth from other areas, most probably from the Black Country.

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<sup>2</sup> <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/householdprojectionsforengland>

South Staffordshire	ONS2014	ONS2016	ONS2018
Demographic Need	195	203	204
Standard Methodology (2020- 2030 base and 2020 affordability rates)	<b>243 (25% uplift)</b>	252	254
Local Plan 40% Cap (based on 175 dpa)	245	<b>245 (24% uplift)</b>	<b>245 (25% uplift)</b>
Demographic Requirement (2021-2038: 17 Years)	3315	3451	3468
Plan Requirement (2021-2038: 17 Years)	<b>4131</b>	<b>4165</b>	<b>4165</b>

Table 1: ONS Housing Need for South Staffordshire Summarised

*b. Birmingham and Black Country Overspill*

The South Staffordshire Plan goes on to increase that figure by 4,000 to account for assumed overspill housing from the Conurbation, principally the Black Country. This is more contentious and I discuss in this section the question of whether that overspill figure is justified.

According to the Plan this figure was set in 2018 following the GBHMA Strategic Growth Plan (Para 4.8) which estimated the short fall across the whole area (mainly Birmingham and the Black Country) to be 28,000 dwellings by 2031 and 61,000 by 2036<sup>3</sup>. However, as the South Staffordshire Plan itself acknowledges (Para 4.11) that overspill has since dramatically reduced.

But it is important to stress that this provision would be under the Duty to Cooperate provisions of the planning system, in which a local authority can ask neighbouring authorities to accept some of its overspill need. There is no requirement for the receiving authority to agree to this. And it would seem that there is a strong reason for reluctance by South Staffordshire to accept any additional housing given the impact on Green Belt and the 'exceptional circumstances' required for its release.

<sup>3</sup> [https://www.birmingham.gov.uk/downloads/download/1945/greater\\_birmingham\\_hma\\_strategic\\_growth\\_study](https://www.birmingham.gov.uk/downloads/download/1945/greater_birmingham_hma_strategic_growth_study)

I also note that this figure of 4,000 homes, up to this point, been referred to as being 'tested' by South Staffordshire. **What that meant in practice is unclear.** Sites have been allocated to meet it but I can see no specific logical case put forwards for why the level of housing being accepted should be that high.

As set out further on in this report the Plan could provide just under 1,000 homes for the Black Country based on already allocated sites and a more realistic windfall assumption. This would avoid the removal of Green Belt sites which require 'exceptional circumstances' to be released. Without a clearer justification for the figure of 4,000 it is hard to conclude that condition has been met.

### Birmingham

One critical reason for the reduction has been the over-estimate of housing need and under-estimate of housing capacity which underpinned the Birmingham Plan in 2014 (See Detailed Update of Birmingham's Housing Position in Appendix 2). There are two reasons for this.

The first is that, unlike South Staffordshire, the ONS2014 housing projections seriously over-estimate need in Birmingham compared to either of the updated ONS projections. Under the ONS2018 figures, the demographic need would be lower than the plan provision and the Standard Methodology figure only just above it (See Table 2).

Secondly, the supply of houses, particularly of windfall homes, has dramatically outstripped the Birmingham Plan where the windfall assumptions were excessively conservative, based on the low-levels of building in the recession not the longer-term trends.

In fact, since 2017 when the shortfall was established, the capacity in Birmingham has increased by 13,942 or 27%, according to the Combined Authorities 2020 Update Report<sup>4</sup>.

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<sup>4</sup> Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Housing Need and Housing Land Supply Position Statement (July 2020)

Standard Methodology Housing Need (2020-2030 Base, 2020 Affordability)	Official Local Plan Need	ONS2014 Capped + 35% (Birmingham and Wolverhampton Only)	Standard Methodology ONS2014	Standard Methodology ONS2016	Standard Methodology ONS2018	Demographic Need 2018	Official Local Plan Provision
Birmingham Plan	4550	4829	5000 (Capped to 3577)	3631 (Capped to 3577)	2582	2350	2555
Black Country (Consultation Plan)	4004	3981	3741 (Capped to 3711)	2947	3324	3000	2518
Total	8554	8810	8741	6578	5906	5350	5073

Table 2: Standard Methodology, Comparison of annual figures for Birmingham and the Black Country based on 2020 Affordability Rates



This is not surprising because since 2016 windfalls have averaged 1822 dwellings per annum, and consistently above 1000, while the authority is still assuming only 600 windfalls a year and has not updated its approach in line with the evidence. Even updating that assumption to a modest 1000 dpa would add 5,815 to the supply up to 2031 and more beyond. The majority of those are flats. However, 29% are houses and 62% outside the City Centre<sup>5</sup>.

*Table 6: Change in housing capacity (2011-31) by Local Authority 2017 (SGS baseline) to 2019<sup>14</sup>*

LPA	2017 SGS	2019	change	%	LPA	2017 SGS	2019	change	%
Birmingham	51458	55400	13942	27%	Sandwell	19930	14824	-5106	-26%
Bromsgrove	5099	5335	236	5%	Solihull	15717	17273	1556	10%
Cannock Chase	4615	4969	354	8%	South Staffordshire	3493	4090	597	17%
Dudley	17918	17514	-404	-2%	Stratford on Avon	16713	16624	-89	-1%
Lichfield	10973	11287	314	3%	Tamworth	4495	5267	772	17%
North Warwickshire	9060	9071	11	0%	Walsall	10879	12155	1276	12%
Redditch	7488	7329	-159	-2%	Wolverhampton	13816	14244	428	3%
					Total	191654	205382	13728	7%

However, this was then complicated because the Government announced on 16 Dec 2020 in its response to consultation on its proposed planning reforms, that instead of adopting the heavily criticised new housing algorithm it previously proposed instead of the current standard methodology it would instead stick with the current calculations but add 35% to the largest twenty cities, an arbitrary figure designed purely to meet its political target<sup>6</sup>.

But in the same statement the Government caveated this increase, saying it should specifically be met within those cities because 1. that is where the services are, 2. there is a ‘profound structural change’ likely that will release land for housing and 3. it helps meet climate change ambitions.

And the real-world change in our cities is visible for all to see. There has been a significant shift in retail behaviour (accelerated by the COVID pandemic) which has seen high streets contract and vacant units in many other retail centres. The move towards increased home-working has also been accelerated by the pandemic potentially leading to smaller floor space requirements for future office developments. These effects are still in their infancy and hard to quantify, but support the view that there is likely to be more dynamic change in our cities which will support (and indeed rely on) a continued flow of windfall housing development opportunities on brownfield sites.

Unfortunately, at present many planners are simply adding the 35% to the existing figures and coming out with increased shortages at the other end of the calculation. Given that the 35% is added to an already inflated ONS2014 figures (albeit capped in

<sup>5</sup> [https://www.birmingham.gov.uk/downloads/file/19174/shlaa\\_2020\\_final\\_report](https://www.birmingham.gov.uk/downloads/file/19174/shlaa_2020_final_report), Page 30, Windfalls.

<sup>6</sup> <https://www.gov.uk/government/consultations/changes-to-the-current-planning-system>

Birmingham's case), this appears completely irrational. Taking into account both the need and supply issues in Birmingham there seems no reason why the city should not meet its own housing needs. The overspill appears dubious.

### Black Country

However, despite this underlying improvement in housing supply across the conurbation, and particularly in Birmingham, South Staffordshire has not reduced its contribution to meet the GBBHMA shortfall (4,000 homes).

This is because the emerging Black Country Plan sets a shortfall of 47,837 homes (by the later date of 2039). Some of that shortfall is being targeted at Green Belt sites in the Black Country, mainly Walsall, but the Plan assumes 28,239 will be provided in neighbouring authorities (including South Staffordshire).

But I would question the basis for the degree of overspill set out by the Black Country Authorities. As the report I did for West Midlands CPRE examining their Urban Capacity Report of May 2021<sup>7</sup> shows (Appendix 1), this shortfall is predicated on a number of questionable assumptions which a number of parties, including CPRE, are challenging through the Black Country Plan process. Moreover, the approach has been questioned not only by the West Midlands Mayor, but also senior Black Country politicians including, for example, the Leader of Dudley Council.

As with Birmingham the use of the ONS2014 Housing Projections artificially increases the need. On the same calculation the ONS 2016 figure is 15,580 less and the ONS2018 figure is 7,258 less. Furthermore, if you remove the 35% uplift for Wolverhampton you reduce the figure by 5,130. Taken together using the latest 2018 projections along with removing the 35% uplift would reduce the need by 12,483 or for the lowest 2016 projections by 19,646.

In fact, the 2016 figure may well be the most accurate because the 2018 figures rely on the new recording methods from the NHS to identify internal migration patterns between local authorities within England. Moreover, as these numbers are all based on the Standard Methodology, they all add additional homes to the actual demographic need.

And taken alongside the most up-to-date demographic figures (ONS2018) this would suggest just over 5,300 homes were needed a year across both the Black Country and Birmingham (See Table 2) and even with the SM affordability add on only 6,000. However, the official Government calculation is for 8,800 homes. Over twenty years that amounts to need-inflation of between 56,000 and 70,000 homes. Without that housing inflation there would be little need to build on the Green Belt anywhere, even without any increase in windfalls in the conurbation.

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<sup>7</sup> <https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4c/>

And not only is the need exaggerated in the Black Country. The work I did for CPRE suggests the supply is being under estimated. My calculation suggests at least 5,897 windfalls should be added to the supply, including an allowance for some larger windfalls in line with past trends. Including that figure, as well as removing the 35% uplift, would adjust the supply equation by significantly more than the houses proposed in South Staffordshire.

Moreover, as with Birmingham, there is reason to believe that what the Government refers to as 'profound structural change' is likely to impact on the Black Country. Indeed, the greater weakness of the Black Country centres suggests both that they are more likely to contract and more important that housing is introduced to those centres to support their future prosperity.

Although the Government has said using different lower housing figures requires strong justification, the level of over-estimation and the direct impact on Green Belt, both inside the Black Country and in surrounding areas, justifies, in my view, a case for lower housing figures.

Given the extent of that discrepancy, around 25,000 over the plan period, reducing the deficit in the Black Country to 22,000, with potential surplus in Birmingham, the case for allocating Green Belt land in South Staffordshire (and elsewhere) is seriously weakened.

It should also be said that the use of the shortfall is not simply a theoretical exercise. In practice it creates a fixed and, in many cases, wholly-unrealistic brownfield capacity, which allows the release of Green Field (in this case Green Belt) sites in poorly located areas. Those releases themselves influence the market to reduce provision on brownfield sites.

And as the 16 December 2020 Government statement rightly points out they are generally in areas with less access to services and where there is likely to be much greater reliance on private transport, increasing the impact on both congestion and climate change.

Moreover, the 16 December 2020 Statement reiterates the Government's intention to repeal the Duty-to-Cooperate mechanism under which local authorities are obliged to consider their next-door neighbour's need, albeit it there is no clarity as to any replacement.

Lastly, it is important to consider that before either the Black Country or South Staffordshire Plan are adopted, we may have more up to date demographic evidence in terms of the 2020ONS Population figures, as well as updated baseline figures based on the Census which, if they confirm the lower housing need in the last two ONS projections could have implications for the overall housing need.

c. *Housing Supply in South Staffordshire*

The first thing to note about the supply in South Staffordshire is that the Plan significantly over-supplies housing in the Borough (even including the Black Country over-spill) by **1153 homes (13%)** (See Table 3). This oversupply is hard to justify. There is no evidence put forwards that suggests housing in the authority is not being delivered.

Minimum Housing Supply (South Staffordshire Plan 2018-2038)	Plan	Plan Plus increased Windfalls	Only Allocated and Safeguard Land/Increased Windfalls
Tier 1	3980	3980	2041
Tier 2	1707	1707	1337
Tier 3	651	651	570
Tier 4/5	288	288	288
Areas adjacent to neighbouring town and cities	2958	2958	
Windfalls	450	1500	1500
Total	10,034	1,1084	5736
Above Need (with Black Country Over-spill)	1153 (13%)	2303 (26%)	-3145 (-35%)
Above Need (without Black Country Over-spill)	5553 (106%)	6603 (137%)	855 (18%)

Table 3: Based on Summary of Minimum Housing Provision in South Staffordshire Plan

According to the SHELAA *‘It is also important to note that in the monitoring period this statement is based on (2007-2017), only one planning permission for 10 or more dwellings has lapsed meaning that it would not be appropriate to apply a blanket non-implementation rate to sites of 10 or more dwellings.’*

The SHELAA does suggest that sites under 10 dwellings have sometimes not been completed within 5 Years. However, these would in most cases be windfalls and since the past windfall rate is calculated based on completions, there seems little justification for discounting, especially as the current windfall allowance (as discussed further on) is considered conservative by South Staffordshire Council themselves.

Moreover, the Plan **assumes these are ‘minimum’ figures**, partly because the assessments are in many cases based on generalised density assumptions. In other words, there may well be room for increasing delivery on some sites.

According to the Plan (Para 4.18) this is justified because it *‘will help the plan to meet the national policy requirement to respond to changing circumstances in the plan period.’* However, this seems a **weak justification** given the level of over-supply,

and that the Plan is already heavily over-supplying for its own need and that all the evidence is that the need in the conurbation is likely to be over-estimated and the supply under-estimated. Moreover, it does not seem consistent with the Council’s own climate goals.

The second issue is the under-provision of Windfalls against the Authority’s own evidence. The SHELAA gives a table of windfall provision in the Borough. This covers the period 2000-2016.

Windfall Allowance Options

Gross completions all sites 2000 – 2016	4235	265 pa
Gross windfalls	3273	205 pa
Windfalls less completions on former residential land	2211	138 pa
Non-residential land windfall sites >10 dwellings	1496	94 pa
Non-residential land windfall sites >10 dwellings excluding colliery site and large scale conversions	1002	67 pa
Non-residential land windfall sites <10 dwellings	715	47 pa

Table 4: Windfall Completions, South Staffordshire (From 2021 SHELAA)

It can be seen that, even relying only on small windfalls, the Plan figure of 30 dpa is below the level achieved. If one adds in larger windfalls, excluding one-offs the level of windfall supply significantly increases.

There is a further source of supply on former residential land, but Para 5.60 of the SHELAA specifically excludes consideration of this. That policy position is consistent with previous versions of the Government’s National Planning Policy Framework but the 2021 Version (Para 69), only suggests local Plans ‘*should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.*’ It no longer excludes such sites from the windfall calculation. The previous position, as adopted by South Staffordshire, has always been questionable, given that some residential infill will happen (indeed, in some cases will be desirable) and so will contribute in reality to supply.

In other words, the assumption in the Plan of only 30 dpa of windfalls seems not merely conservative, but highly unlikely. There appears to be a justifiable historic supply of 47 dpa from small sites (which is the way the figure is usually calculated in Plans) as well as up to 67 dpa from large sites (114 dpa) and up to 138 dpa if one considers all residential sites.

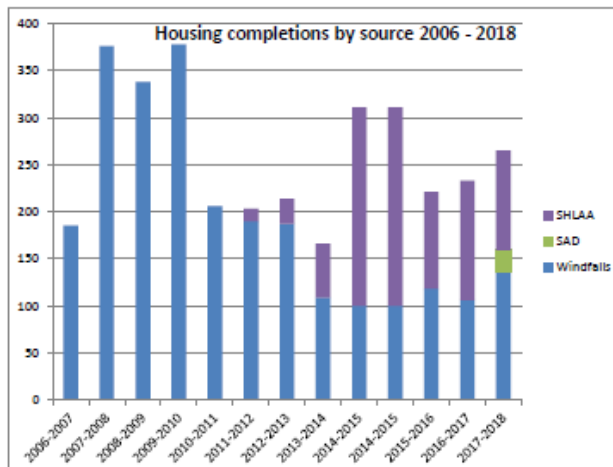


Table 5: Housing Completions, South Staffordshire (From 2021 SHELAA, 5 Year Land Supply)

It seems that a minimum windfall assumption of 47 dpa seems easily justified. This would amount to 705 dwellings over the plan period, 255 extra homes (using 15 years, assuming windfalls in the first two years are already in the planning system). However, a more realistic figure would be 100 dpa which has been exceeded in every year since 2006 (see page 27 of the SHELAA) which would amount to 1500 over the plan period. This would increase supply over the plan period by 1050.

In Table 3 the final column demonstrates that if one includes a more realistic windfall provision one can provide more than enough housing for the needs of South Staffordshire and make a more reasonable contribution to Black Country Need of 855 homes.

There are some further assumptions in the SHELAA in relation to the yield from each site. In some cases, there is specific site information which justifies the number of houses on each site. However, where that is not the case the SHELAA uses assumptions about how much of the land will be developable and what density will be achieved. In the case of sites above 2 hectares, for example, only 60% of the gross land is assumed will be developed. While these may be reasonable for the purposes of that exercise, they allow for the assumption that minimum housing delivery may be exceeded.

Lastly in terms of supply the Policy SA3 - Strategic development location: Land North of Linthouse Lane, which considers this particular site, gives the capacity of the whole site area released from the Green Belt as 1976 homes, of which only 1200 are anticipated to be provided within the Plan Period.

However, that assumes that delivery of housing on that site (as on others) reflects past delivery rates achieved in the past ten years (2007-2017) as is explained in the 2021 SHELAA (Para 5.47).

The Council goes on to say in the same paragraph of the SHELAA that it will review these assumptions with relevant stakeholders prior to the submission of the Local Plan Review, to ensure that they reflect the most up-to-date market trends.

However, there is no reason to believe housing delivery would not exceed expectations, adding 776 homes to the supply, and thus, by releasing this site, potentially creating further oversupply above the genuine need identified in the plan.

The SHELAA includes land for 71,329 homes which is either suitable or potentially suitable, and land for 27,591 homes which is considered unsuitable (whether because its location is not close to a local service centre or because it is open space, local nature reserve or other designations or reasons). I have not considered all the sites but I am aware that most will be greenfield sites (given the nature of South Staffordshire) so I do not consider there is likely to be significant additional urban supply within the Borough itself which could alleviate the need for housing in South Staffordshire.

#### *d. Conclusions on Housing Need and Supply*

Having considered the overall position in regards to Need and Supply, I conclude that the Standard Methodology figure should be considered a robust assessment of need in South Staffordshire and amounts to 4131-4165 dwellings over the plan period (4881 including housing supply from 2018). This would include some 700 additional to demographic need. Given that there are 2628 on allocated sites (Table 8) and a further 1500 are likely to come forward as windfalls, this would drastically reduce the amount of Green Belt land required. I see no reason to increase it.

I do not consider the additional 4,000 to meet housing need in the Black Country (and more widely the conurbation) is clearly justified. Given that delivery in Birmingham suggests significantly greater supply in the urban area than is being allowed for and given the overestimate of real need (perhaps by 20,000) and underestimate of supply (perhaps by 5,000) in the Black Country, the level of overspill and the amount South Staffordshire should accommodate seems to me unproven. Specifically, the use of the 35% uplift in Wolverhampton to justify the shortfall seems contrary to Government Policy. The figure of 4,000 should be removed from the Plan and, if it deemed necessary, a policy included for an early review of the Plan when more up-to-date information is available.

I also consider that, even if the Black Country overspill is accepted, the supply in South Staffordshire is excessive. Not only are there 1153 homes (13%) in the supply above the need (with the Black Country overspill included) and 5553 (106%) above the need (without the Black Country) but a further 1050 can be reasonably expected to be delivered on windfall sites over the plan period creating an oversupply of 6603, (137% above the need generated within South Staffordshire) and, even with the Black Country contribution 2303 (26%). This oversupply would only be exacerbated if the additional 776 homes actually came forward on the Linthouse Lane site within the plan period.

Lastly, it is worth pointing out that within the ONS demographic calculations there are already assumptions about migration and it is reasonable to assume, given the nature of South Staffordshire, that some, if not much of the growth assigned to South Staffordshire will already come from out-migration from the neighbouring conurbation, particularly Wolverhampton and the Black Country (See SHMA discussion below). This suggests that at a policy level the numbers-driven approach currently being adopted will accelerate that process.

This would, on the logic of the Government's 16 December 2020 Statement, be against good planning because it would direct housing 1. away from where services are, 2. away from where there is likely to be 'profound structural change and 3. towards locations which will undermine our climate change objectives, of which the Essington site would be just one example.



#### 4. SHMA/Underlying Housing Evidence

As well as the housing calculations the Council commissioned HDH Planning to update the Strategic Housing Market Assessment (SHMA) in 2020. The report gives a detailed breakdown of housing characteristics within the Borough.

The report includes, for example, evidence about commuting patterns from the 2011 Census (Table 1.1). Although 20.7% of people in work commute within South Staffordshire, of the rest 45.8% commute to the Black Country 23.9% to Wolverhampton and 5.9% to Birmingham.

In terms of migration Table 1.3 shows that 45% of people who left South Staffordshire in 2018 moved to Wolverhampton, Walsall or Dudley based on ONS projections and 49.5% moved to South Staffordshire from all the Black Country authorities, with Wolverhampton, Walsall and Dudley the three highest scorers.

Table 1.4 goes on to include a comparison of average land registry house prices showing prices in South Staffordshire are higher than the Black Country across the board, with an average in 2019 of £257,051 compared to £185,042 (Walsall), £191,279 (Dudley) and £167,010 (Wolverhampton).

The introduction to the SHMA concludes that it is still correct to include South Staffordshire within the GBBCHM (Para 1.28). However, it can also be deduced from this evidence that new homes provided in the South Staffordshire Green Belt, especially adjacent to the Black Country boundary, are likely to predominantly attract residents from the Black Country who will then, if they are working, commute back into the Black Country. The price distinction suggests those most likely to be drawn out of the Black Country are those who can afford more expensive properties, whether working or retired, and that this is likely to contribute to greater social polarisation within the Black Country.

Figure 2.1 of the SHMA compares the age range of people in South Staffordshire between 2013 and 2018 and confirms a significant aging of the population which may also explain the estimated reduction in household size between 2011 and 2016 compared to a level figure for the West Midlands and England (Table 2.1). Fig 2.3 goes on to show a greater number of households with two adults but no dependent children.

At the same time the level of unemployment is unsurprisingly lower than the average (Figure 2.4) and Occupational Groups generally higher than across the West Midlands (Table 2.2) with qualifications also higher (Figure 2.5) as well as individual and household incomes (Figures 2-6-2.8). This affluence is reflected in larger house sizes (Table 2.8) with more owner-occupiers (Figure 2.10).

Figure 3.1 goes into more detail, considering the distribution of house prices across South Staffordshire. Further tables consider the cost of houses across both the private and rented sector. They culminate in Figure 3.10 which sets out the affordability of properties across different groups and not surprisingly shows that it is among lone parents and those households needing 4 bedrooms that houses are least affordable.

The SHMA goes on to consider the impact on South Staffordshire of the projected growth from the Plan, including the overspill 4,000 homes for the Black Country. Table 5.1 shows the dramatic increase in population from 2018-2038 rising from 112,125 to 129,908. Of the 17,783 additional people 3,872 would be 60-75 and 7,403 over 75. In other words, 11,275 additional people, or 63%, would be over 60, comprising over a third of the population. Not surprisingly this would lead to a rise in one person households.

The SHMA goes on to consider the implications of such a population increase on the size and tenure of housing required and also identifies the potential for increased need for specialist accommodation.

In relation to housing need and supply my conclusion from this snapshot is that South Staffordshire's position as an affluent neighbour to the Black Country means it is likely to remain a location which draws in more wealthy people from the sub-region.

Given the level of potential demand it is hard to see why new housing provision, particularly in the wealthier areas of South Staffordshire would reduce prices or alter the profile of those leaving the Black Country for South Staffordshire.

Taking account of the doubts I raised in earlier sections about the genuineness of the overspill issue in the Black Country (explicitly accepted by the SHMA writers who adopt the ONS2018 calculations) I would be concerned that the provision of additional housing in South Staffordshire will not address local affordability issues (something also tacitly admitted in the SHMA which requires a much higher allocation to provide enough affordable houses) but will increase socially and environmentally unsustainable out-migration into the District from the Black Country.

## 5. Distribution of Development

A number of options were considered for the distribution of development in South Staffordshire in the Spatial Housing Strategy of October 2019 of which Option G was chosen which was classed as Infrastructure-Led Development with a Garden Village area of search beyond the Plan Period.

At that time South Staffordshire had only committed: *'to continue to test a contribution of up to 4,000 dwellings towards the unmet needs of the wider GBHMA'* (Para 5.11)

The approach to those Options appeared reasonable, but only if one assumed the need for such a high level of additional housing. As set out in Table 3 above, the requirement to identify additional land was entirely driven by the West Midlands Conurbation overspill issue.

Following that Strategy, the site selection process was then set out in a Site Selection Topic Paper. The Plan itself then modifies this approach, among other things increasing housing around Cheslyn Hay, Great Wyrley and Penkridge and reducing housing on the Western edge of the Black Country on the basis that Dudley has lower levels of unmet need.

A further question then arose as to whether to locate more development in the Open Countryside area outside the Green Belt. However, that would generally fare worse in terms of sustainable development.

In terms of the sites remaining on the edge of the conurbation, the contribution South Staffordshire might have made to the Seven Cornfields site has been removed, as has the Black Country element of that site. There are three major sites, one just north of the M54 at Coven, one at Lower Penn and the Linthouse Lane site itself.

All three sites play a similar role to sites within the Black Country boundary and I do not consider that any additional sites should be found in the Green Belt in the Black Country to replace them. Anyway, my evidence suggests this is not needed. The Boundary is, itself, tightly bounded to the conurbation, except in Walsall where considerable and controversial sites are also being considered.

## 6. Linthouse Site Issues

### *Site Assessment: (Site 486c)*

I have based my site assessment on my observations during the site visit of 1 December. It is not a technical assessment but I do suggest areas where further work may be of assistance. Pegasus have previously produced an indicative site map which I also considered. However, there is no guarantee that this layout will be the one adopted.

The number of houses proposed on the site is given as 1976. That would tally with the default assumptions in the SHELAA of 60% development at 35 dwellings per hectare for sites adjacent to the Urban Area. (94.1 hectares, 56.46 hectares developable, 1976 homes) of which 1200 are provided within the plan period. It is not quite clear to me how this latter figure is arrived at. It would amount to 10 years of delivery according to the SHELAA criteria (120 dpa) and a 5-year delay in delivery. These rates of build out are historic and may well be exceeded.

#### *a. Green Belt*

The first and most important question is whether exceptional circumstances exist to remove that site from Green Belt. According to the 2021 LUCs Green Belt Assessment Sub-Parcel S20Fs1, which includes this site as well a triangle of land adjacent to Wood End Road and land to the West of Essington itself:

*'makes a strong contribution to preventing sprawl of the West Midlands conurbation at Wednesfield, a moderate contribution to maintaining the separation between the neighbouring towns of Wednesfield and Great Wyrley, and a strong contribution to preventing encroachment on the countryside. The sub-parcel is adjacent to the settlement edge of the suburbs of Wednesfield to the east, south and west, however it retains a strong relationship with the open countryside to the north.*

*Some of the land lies in the gap between these suburbs and the inset village of Essington, however the gap between the two has already essentially been breached by the housing development along High Hill Road. The existing Green belt boundaries at Wednesfield and Essington are not strongly defined, however given that there are no obvious stronger alternatives, releasing land here would serve to weaken the integrity of Green Belt land.'*

In terms of the site's role in the Green Belt, the Appendix identifies it as having a strong rating in regards to Purpose 1: preventing urban sprawl and Purpose 2 preventing the merging of neighbouring towns as well as Purpose 5: the impact on urban regeneration (the last is not tested for individual sites but generally assumed in the

assessment criteria) and moderate in terms of Purpose 3: encroachment into the countryside. It is only in terms of Purpose 4: Setting of Historic Towns that it unsurprisingly is considered to have a weak contribution.

This leads to an overall 'high' rating which is consistent with other sub-parcels in the area covered by the larger S20 parcel. I concur in general with this assessment. I noted on my site visit the openness of the countryside and the links between the site and the surrounding Green Belt, including footpaths and the disused mineral railway line. Although the site is bounded on three sides by housing, the link to the countryside beyond Blackhalve lane seems to me strong. Given that rating and my own observation it seems to me that releasing this site from the Green Belt would impact highly on the purposes of the Green Belt and should be avoided.

#### *b. Sustainability Appraisal*

Further justification for the release of this site is the conclusions of the Sustainability Assessment (which relies most widely on the Council's Green Belt and Landscape Assessments as well as the views of the Highway Authority.) The Appraisal (Table 4.4) identifies the site as severely negative in terms of climate change and landscape and townscape, and no positives apart from housing and employment. In this it only performs better than other sites in the Essington area in terms of education and worse in terms of several other indicators, including climate change.

Emphasis is also placed in Para 4.13.2 on the provision of a new local centre as part of the development proposal which would, according to the SA, improve accessibility. Similarly, Para 4.14.1 relies on the provision of an additional primary school as part of the development.

It is also identified as being one of the best performing sites in terms of employment. As far as I can see this is based on proximity to i54 and the Wednesfield's industrial centre, although I am uncertain this is particularly more advantageous when compared to other sites within the S20 area.

#### Flooding and Water Issues:

The site is in Flood Zone 1. However, it is also one of the sites where the SA anticipate pluvial flooding issues which could be exacerbated, both on the site and in the surrounding area. When I observed the site there was standing water in areas close to Linthouse Lane, where the land drops down towards the road. This is also noted by Pegasus.

#### Landscape:

B.11.4.8 of the SA acknowledges the landscape impact of a number of the sites in S20, referring to 'Settled Plateau Farmland Slopes'. While I agree with this, it risks

underplaying the specific landscape and townscape impact of this site, which rises from Linthouse Road and is highly visible from all the surrounding residential areas.

It seems to me that further detailed assessment by a landscape specialist may be helpful in determining the extent of the issues relating to landscape impacts. Development would also reach as far as Blackhalve Lane, and would be highly visible from that high point.

It seems to me there may be significant landscape impacts and further detailed assessment by a landscape specialist may be helpful in determining the extent of the issues relating to any landscape and townscape impacts and whether the 'moderate' designation in the SA is justified.

The SA also refers to resident's view from Wood Hayes Road but not, surprisingly, views from Kitchen Lane and Linthouse Road. It seems to me that the impact on those roads is, if anything, likely to be greater, given the topography and openness of the site and would disadvantage a much large number of people who would look directly out across the site. This concern is exacerbated by the zoning approach which Pegasus suggest would be adopted with higher density and massing of houses in Character Areas 3 and 4, that is to say where they would be most visible to existing residents.

The SA refers to urbanisation of the land around Essington. However, clearly, this would lead to the loss of countryside for those on the edge of the conurbation.

There are power lines running over the site and several pylons. It is unclear that these would be removed. While it would be a positive benefit if they were leaving them is clearly detrimental to the site.

#### Ecology:

The site is not identified as having any designated habitats in the SA. It is largely open agricultural fields with some trees and hedgerows, However, the Mineral Railway Line which runs along the edge of the site and it may well act as a wildlife corridor given its link to other wooded areas, for example on Kitchen Lane.

It seems to me that further detailed assessment by an ecologist may be helpful in determining the extent of the issues relating to any ecological impacts.

#### Public Rights of Way:

There are three public rights of way which cross the site (one at the eastern boundary) including a bridleway. I understand the Mineral Railway Track is also used for leisure purposes. These footpaths link into a wider network of footpaths which extend to Essington, Manor Farm and to Bushbury. On my site visit I noted that the paths appear to be clearly defined and well used. They appear to provide a significant local asset

which would be seriously impacted by the development both in terms of the immediate impact and the reduction in the overall network of paths.

Coalescence:

The site would potentially create some coalescence. This would be exacerbated if development were later permitted on the extension site promoted by Taylor Wimpey beyond Blackhalve Lane.

Agricultural Land:

I understand the site is Grade 3 Agricultural Land so may cause the loss of a significant parcel of some of the Best and Most Versatile Land in South Staffordshire

Transport:

The site is located adjacent to Blackhalve Lane, Linthouse Lane and Kitchen Lane. The illustrative diagram by Pegasus suggests three access routes, from each respective road. These appear to be minor distributor roads. There is no immediate access to a major distributor route.

At present there is no assessment of the impact of the considerable additional traffic from the site on neighbouring junctions or any assessment of how that traffic might be split, although one would expect additional pressure on a number of junctions, including Linthouse Lane and Wood End Road, Blackhalve Lane and Wood End Road, either end of Kitchen Lane and the junctions between the site and the Lichfield Road.

My visit did not take place during peak hours, but I understand from residents there is already congestion on these roads. Rat-running is likely to be exacerbated, including on Wood End Lane which would act as a cut through to the A460 Cannock Road.

B11.10.4 of the SA suggests all the sites in S30 have good access to the road network and this is a positive in terms of their allocations. However, when I look at the SA for the Black Country Plan in relation to the much smaller sites (303 houses) proposed on Wood End Road (WHO 262, 263, 264 and 271) traffic is considered a significant issue. According to D54-D55 of that assessment:

*To avoid adverse impacts on the wider road network, major improvements will be required to Grassy Lane, Wood Hayes Road, the Grassy Lane\Wood Hayes Road junction and the Wood Hayes Road\Wood End Road signal-controlled junction. Development would also contribute towards increasing congestion on Cannock Road, which has been identified as a pinch point requiring medium term investment.*

*Therefore, major improvements along the routes of Cannock Road and Wood Hayes Road are likely to be required. Details will be set out in the masterplan.*

According to the South Staffordshire SA, the Integrated Transport Strategy for South Staffordshire also identifies the A460 as an issue but I could not locate the document.

Given the proximity of the two developments this suggests that the Linthouse Lane proposals may well exacerbate congestion issues, for example, on Cannock Road. It may be that any improvements undertaken to address the concerns identified in the Black Country SA are undermined by the significant growth from the development.

There is currently no transport assessment for the Linthouse Lane site. Pegasus suggest visibility splays into the site are adequate, but give little further detail. On the face of it, it seems to me that there are potentially significant traffic issues at this site, although there is no technical work yet to assess that and the plan policy is vague as to what will be required.

Linthouse Lane itself is served by the local bus network, the 69 from Walsall to Wolverhampton and at the Wood End Lane side the 25 from Wolverhampton via Bilston to Pendeford. Both are however, extended services, over an hour, which run half hourly services but finish before 19.00 at night. The location of the site at the very edge of the conurbation means extending those services into the sites could be prohibitive. Parts of the site are also beyond 600m from those services. There are no bus services on the other adjacent roads.

The Linthouse Lane site is also a considerable distance from the nearest railway station at Bloxwich North and there is no linking bus service. Access to the station would be likely to be entirely by car. Given the limited bus service to that station and car parking for only 26 cars, in reality, many rail users may well rely on Walsall or Wolverhampton Station.

#### Services GPs/Shops/Leisure Facilities:

The nearest convenience facilities would be at the Wall End junction. The preferred option includes a primary school and other facilities within the development. Pegasus identify a location in the centre of the development and say in their development plan that: *Land accommodating the Community Hub to the centre of the site will come forward when the local demand/ population requires the formation of the community hub.*

This is likely to raise concerns about Taylor Wimpey's commitment to deliver the hub.

The SA refers to the closest GP surgery as Ashmore Park Health Centre approximately 550 m to the east of the site but does not discuss whether it has sufficient capacity. New Cross Hospital is relatively close by. I cannot see reference to specific leisure facilities nearby.



### Education:

The policy includes a new primary school and Pegasus refer to land being available for that. The Black Country SA referring to the sites on Wood End Land suggests they would not be adequate primary school places and they would rely on a new primary school as part of development in Bushbury. **That would suggest that provision of a primary school is likely to be essential.** Secondary Education would be provided at Moreton and Wednesfield High Schools in Wolverhampton. **What is unclear is whether there is capacity at those schools to accommodate both this site and others proposed within the Black Country itself, particularly Wood End Lane and Bushbury.**

C2.3.19 of the SA admits that: Some new residents of the site: *'would not be located within the target distance for secondary education. However, the policy also seeks to provide sustainable transport and active travel routes and it is anticipated that the proposals for the site could provide sustainable access to secondary schools, for example through safe walking and cycling routes. Overall, a major positive effect on education is likely due to the distance between parts of the site and secondary schools'*

While these are admirable goals the current plan policy is general and vague, referring to **'active travel infrastructure'**. It is unclear to me how firm any commitment will be to deliver the necessary access or if this would overcome any shortfall in places.

### AQMA:

**The site would be adjacent to the Air Quality Management Area which covers the City of Wolverhampton,** although it should be noted this is determined by the administrative boundary so in reality the impact is likely to be similar to adjacent areas within the AQMA, especially given the relative closeness of busy urban roads, as well as both the M54 and M6.

### Heritage:

**The SA refers to an 'area within the site identified on the Historic Environmental Record as 'Moated Site, East of Prestwood Farm, Essington'.** The Historic Environmental Character Assessment did not assess this site. But the impact appears to be uncertain and may be something the Parish Council wishes to follow up on.

### Employment:

The site is relatively close to both the Wednesfield Industrial Sites and i54. However, that would apply to other sites in S30.

#### *c. Overall Comments on Site 486c*

As set out in the sections on housing numbers I do not consider there is a need to allocate this site to meet either South Staffordshire's need or need emerging in the Black Country.

The site is next to the Urban Area but I am concerned that in practice it may be very car dependent. As well as the loss of good quality agricultural land I would be particularly concerned about the impact of additional traffic in the local area, the detrimental impact on the local landscape and the impact on public access to the countryside, both the immediate impact and as part of a network of Public Rights of Way.

I would also be concerned about the delivery of key aspects of the site which are needed to ensure it provides adequate local services, notably the hub proposal. Some aspects of the policy, such as provision of sustainable transport infrastructure may also prove to be too vague to ensure they provide what is actually needed.

There are several issues, such as biodiversity and flooding where additional expert advice may assist the parish council.

Overall, I do not consider the 'exceptional circumstances' required to remove the site from Green Belt have been demonstrated.

## 7. Policy Answers

Based on my assessment I was asked to suggest answers to the Policy Questions in the South Staffordshire Plan. The following is not considered comprehensive but may assist in responding to the plan.

### *Chapter 2*

*Do you have any comments on the content or use of the evidence base set out in Appendix A?*

*Please reference document you are referring to and justify your response*

The evidence base is in some cases outdated, especially in the light of trends accelerated by COVID. This is likely to have significant impacts, for example, on the EDNA. The SHMA suggests the current policy approach would encourage significant, and potentially unsustainable, out-migration from the Black Country undermining Climate Change goals as set out above. The current policy of encouraging out-migration into South Staffordshire is not supported.

In terms of Site 486c the Sustainability Appraisal does allow some assessment of the site but it appears to me to underestimate the potential for negative impacts in some areas, particularly in relation to transport and traffic congestion, landscape and access to the countryside. The access to services seems to rely too much on proximity to existing services and not enough on whether those services have capacity. It is also unclear how robust any additional service, educational or public transport service would be.

Appendix A is also limited in the documents it includes. There are serious concerns about the weight being placed on housing numbers, both in terms of Supply and Need. As set out above, there are concerns that the over-spill from the Black Country is over-stated in the Joint Statement of 2020, and the need for South Staffordshire to accommodate it. Equally there are concerns about the level of supply in South Staffordshire, in particular, the overly conservative windfall assumptions, which would suggest South Staffordshire can provide 850 homes for the Black Country without any new allocations.

*(a) Has the correct infrastructure to be delivered alongside proposed site allocations been identified in the IDP?*

There are a number of potential infrastructure issues associated with Site 486c, particularly in relation to traffic congestion, sustainable transport and the delivery of the so-called 'hub'.

*(b) Is there any other infrastructure not covered in this consultation document or the IDP that the Local Plan should seek to deliver?*

See answer to (a)

*Have the correct vision and strategic objectives been identified? Do you agree that the draft policies (Chapters 4 and 5) and the policy directions (Chapter 6) will deliver these objectives?*

Strategic Objective 1 is supported. However, compensatory Green Belt provision is not something that fully ameliorates loss of Green Belt. Our evidence suggests that 'exceptional circumstances' do not exist for removal of many new housing sites from the Green Belt.

Strategic Objective 2 is not supported. The additional 4,000 houses for the Black Country should be removed, and, if needed, a policy to review that position subsequent to the adoption of the Black Country Plan based on up-dated evidence should be included if that is deemed to be necessary. The use of Urban Extensions should be reviewed as it is largely justified because of the acceptance of over-spill from the conurbation.

Strategic Objectives 3-5 on housing can be supported but they should relate to needs arising in South Staffordshire. The evidence that significant housing needs to be included from the Black Country is not supported.

Strategic Objective 12 is wholly inadequate. The Objective should be much higher up in the Plan. The Plan should also aim to support a reduction in Climate Change emissions not only through mitigation at development sites in the overall approach to development location. Accepting significant amounts of housing from the Black Country undermines that goal.

#### **Chapter 4**

*Do you support the policy approach in Policy DS1 - Green Belt and Policy DS2 - Open Countryside? If not, how should these policies be amended?*

The general approach of Policy DS1 is supported. However, the removal of sites from the Green Belt in line with SA1-SA7 is not supported. As stated above we do not consider 'exceptional circumstances' have been proven for these sites, based on clear evidence, not just numerical assumptions of Black Country over-spill. The sites (and, in particular, Site 486c) should remain in the Green Belt.

[I have not considered the sites in Policy DS2 so do not comment either way. I note that the highest level of protection i.e., 'exceptional circumstances' would not apply outside the Green Belt]

*Do you support the policy approach in Policy DS3 - The Spatial Strategy to 2038? If not, how should this policy be amended?*

The addition of 4,000 homes to meet the needs of the Black Country is not supported because the evidence is not clear and the Black Country Plan is still in development. This would result in the removal of the named sites adjacent to the Urban Area, and in particular, Site 486c. A review of whether any of the needs of the Black Country should be accommodated in South Staffordshire might be considered in a review of the plan.

*Do you support the policy approach in Policy DS4 - Longer Term Growth Aspirations for a New Settlement? If not, how should this policy be amended?*

The need for a new settlement is far from proven and given that we do not consider the current inclusion of 4,000 homes for the Black Country is justified it is hard to conclude that an additional settlement is likely to be required or would be consistent with long term Climate Change goals.

## **Chapter 5**

*Do you agree that given the scale of the 4 sites detailed in policies SA1-SA4, these warrant their own policy to set the vision for the site, alongside a requirement for a detailed masterplan and design code?*

No specific comment on these site specifics.

*Do you have any comments on these proposals?*

See answer above.

*Do you have any comments on the proposed housing allocations in Policy SA5? Please reference the site reference number (e.g., site 582) for the site you are commenting on in your response?*

As set out above we do not believe Site 486c should be released. This is because:

1. the housing numbers in South Staffordshire, particularly the uplift of 4,000 to meet Black Country need is not justified and
2. for this reason and wider sustainability reasons, the exceptional circumstances given for the removal of Site on the Linthouse Lane from the Green Belt do not exist.

a. Housing Numbers

3. The justification for the housing numbers proposed in South Staffordshire relies on 4,000 from overspill from the Black Country that is untested. Without them no new allocations are needed.
4. The Government's arbitrary 35% uplift of housing in Wolverhampton is being added to general housing need when it should be targeted at brown-field regeneration.
5. The level of housing supply both in the Black Country (and wider conurbation) and in South Staffordshire is being under-estimated. In the case of the Black Country this could amount to over 5,000 homes and in South Staffordshire another 1,000 homes from windfall sites.
6. Accelerated changes to retail and office provision, particularly in centres following COVID may increase the housing land available in the Black Country.
7. Even if this level of housing is required from the Black Country South Staffordshire is overproviding by 1153 homes.

b. Sustainability of Site 486c

8. There is no need to allocate this site to meet either South Staffordshire's need or need emerging in the Black Country.
9. Although the site is next to the Urban Area, in practice it may be very car dependent. As well as the loss of good quality agricultural land there would be particular concerns about the impact of additional traffic in the local area, the detrimental impact on the local landscape and the impact on public access to the countryside, both the immediate impact and as part of a network of Public Rights of Way.
10. There are concerns about the delivery of key aspects of the site which are needed to ensure it provides adequate local services, notably the hub proposal. Some aspects of the policy, such as provision of sustainable transport infrastructure may also prove to be too vague to ensure they provide what is actually needed.

There are several issues, such as biodiversity and flooding, where additional expert advice may assist the parish council.

## Chapter 6

*Do you agree with the proposed policy approaches set out in Chapter 6?*

*If no, then please provide details setting out what changes are needed, referencing the Policy Reference number (e.g., HC1 - Housing Mix).*

I have not considered in detail the HC Policies which determine how development is considered. Essington Parish Council may have views on these policies and should consider them in detail.

I notice HC14 and HC15 specifically consider the impact on health and education. HC15 refers to the Staffordshire Education Infrastructure Contributions Policy<sup>8</sup> and this may be a specific document the Parish Council need to examine, given the issues I have raised about the adequacy of school provision.

I have not considered in detail the EC Policies which address community services, facilities and infrastructure. Again, Essington Parish Council may have views on these policies and should consider them in detail. I do have concerns about the extent to which some of these policies rely on encouragement rather than instruction.

EC11 in particular seeks to: *'Ensure development is designed to promote high quality walking and cycling, both within sites and to links to nearby services and facilities'* without any clear guidance as to how this will happen.

I have also not considered in detail the NB Policies which address protecting and enhancing the natural environment. Again, Essington Parish Council may have views on these policies and should consider them in detail. I note, however, that this intention to protect and enhance the environment could be compromised if this site is developed.

There is reference to the Cannock Chase SAC and the specific legislation in relation to that. It would be prudent to check if this has any implications for this site given its distance from the SAC designation. NB4 refers to landscape protection and this may be a particular area of concern for the groups given the landscape issues I have raised.

The NB policies which deal with climate change should be linked to policies on the location of development. As stated earlier the approach to climate change is considered too weak when accounting for the long-term impacts on climate change of such unsustainable development patterns.

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<sup>8</sup> <https://www.staffordshire.gov.uk/Education/Schoolsandcolleges/PlanningSchoolPlaces/Information-for-developers/Planning-policy.aspx>

*It is proposed that the fully drafted policies in this document (Policies DS1-DS4 and SA1-SA7) are all strategic policies required by paragraph 21 of the NPPF.*

*Do you agree these are strategic policies?*

Yes, but the obvious omission is a strategic policy to limit the impact of development on Climate Change, including its location and its impact on development in more sustainable locations.

*Are there any other proposed policies in Chapter 6 that you consider be identified as strategic policies?*

See comment above about Climate Change.