

Local Plans Team  
South Staffordshire Council  
Council Offices  
Wolverhampton Road  
Codsall  
South Staffordshire  
WV8 IPX

Date 13 December 2021

Via Email only

## **Re: Local Plan Review – Preferred Options**

Dear Kelly

Thank you for consulting Staffordshire County Council (SCC) on your Local Plan Review Preferred Options Consultation. It is clear from the evolution of the Plan that advice and recommendations given by SCC in previous rounds of consultation and during our regular meetings have been taken on board.

It is acknowledged that sections 1.8 to 1.10 set out the significance of Climate Change for the Local Plan and that climate change measures will be a consistent thread that will run through the plan. However, the Vision for the Plan makes no reference to Climate Change. Given the significance should the Vision also include reference to Climate change mitigation and adaptation.

The Issues and Challenges to be considered by the Plan are well covered and the Strategic Objectives are supported.

It is acknowledged that the Plan makes a significant contribution towards the wider Greater Birmingham Housing Market Area (GBHMA) needs. Early consideration of this has allowed us to assess the associated infrastructure requirements for the planned growth.

The Longer Term Growth Aspirations for a New Settlement will allow for consideration of accommodating further unmet housing need in a Planned manner and informed by the likely infrastructure requirements. In considering the area of search set out in Appendix F it is considered that limiting the search to an independent/freestanding new settlement may limit options. It is therefore suggested that Policy DC4 should also provide for consideration of expanded settlements within the area of search following the same criteria as a new settlement.

## Transport

We have the following comments to make from a Transport Planning perspective.

Pp 15 Question 1 Do you agree that the evidence base set out in Appendix A is appropriate to inform the new Local Plan ?

From a transport perspective, the following documents should be considered for inclusion within the evidence base:

1. South Staffordshire District Integrated Transport Strategy, rather than the Staffordshire Local Transport Plan 2011. The District Integrated Transport Strategy will be updated to reflect the emerging Publication Plan and will inform the next revision to the Infrastructure Delivery Plan.
2. Brinsford Parkway Station Strategic Outline Business Case
3. Staffordshire Freight Strategy 2019
4. Transport Impacts (with Staffordshire County Council) 2022 – Note that this document has yet to be completed and published. It will contain transport modelling assessments relating to the impacts of sites covered by policies SA1-SA4, accessibility mapping and connectivity proposals for sites within SA1-SA5.

PP 17 Question 1 b) The South Staffordshire District Integrated Transport Strategy will be updated to reflect the emerging Publication Plan and will inform the next revision to the Infrastructure Delivery Plan.

Pp25 Question 3 a) Yes, but Table 4 could include a reference to the support for new rail-based parkway at Brinsford and this should be echoed in Strategic

Pp 29 Housing

Pp 31 para 4.16 talks about *'limiting new (housing) allocations at Perton to the existing safeguarded land reflecting the lack of a finalised junction improvement scheme at the A41 and the remoteness of Greenbelt Site options from education facilities'*

SCC has undertaken work that demonstrates that additional housing could be accommodated by implementing an identified improvement scheme at the A41/Wrottesley Park Junction. Furthermore, there are options to improve connectivity / provide transport that could make development acceptable from a school transport perspective.

Pp 46 Policy DS3 – The Spatial Strategy

SCC has assisted SSDC by providing the transport evidence to support its Spatial Strategy to 2038, providing high level transport modelling, accessibility and connectivity advice. This will help in identifying and addressing infrastructure issues from housing development with cumulative and cross boundary impacts. SCC supports the provision of a rail-based parkway at land at Cross Green development and is working in partnership with City of Wolverhampton Council and SSDC to assist with delivery. Similarly, SCC have helped with the development of several of the district's freestanding employment sites (e.g. I54, ROF Featherstone Brinsford and Four Ashes)

and following the WMI decision, support their continued development, subject to appropriate mitigation where necessary.

Pp 49 Policy DS4 – Longer Term Growth Aspirations for a New Settlement  
Policy DS4 Question 6.

The wording should mention that a range of technical studies will need to be undertaken to justify the proposal and evidence how the new settlement will be delivered in a way that achieves the objectives.

Pp 51 Site Allocations  
Housing

For this consultation response, SCC is providing detailed transport comments and observations on each of the four proposed strategic housing allocations included within Policies SA1-SA4 and the smaller housing sites included within Policy SA5. These comments derive from technical work undertaken in partnership with SSDC to help inform plan-making.

SCC commentary covers the following themes:

- Site accessibility
- Connectivity (active modes – walking and cycling and public transport)
- Potential highway Impact

#### Site accessibility

TRACC analysis has been undertaken by SCC to help identify the most sustainable locations across South Staffordshire and provide a basis for establishing the relative sustainability of settlements based on existing service provision.

TRACC calculates journey times based upon public transport timetable data, road network information and a range of user-defined parameters.

The following calculations have been undertaken:

- PT Access to Employment AM Peak 07:30 to 09:30
- PT Access to Hospitals Wed 08:00 to 10:00
- Bus Access to Supermarkets Wed 10:00 to 13:00
- Bus Access to Supermarkets Sat 10:00 to 13:00
- Walk Access to Middle Schools
- Walk Access to Primary & First Schools
- Walk Access to GP Surgeries

A maximum journey time threshold of 60 minutes was set for the PT and Bus calculations. This includes the initial walk time to the stop, and interchange time plus the final walk from the stop to the destination. The software computes a journey time for every 10-minute interval within the defined time period to the nearest destination point and the shortest journey times are returned. Therefore, the accessibility contour maps represent the best journey time that can be achieved within the defined time period. This is via the road and footpath network, so better simulates an actual journey rather than just a straight line distance from origin to first stop or from the final stop to the destination point. The maximum walk distance to access a public transport stop has been set at 350m.

The bus timetables used are the most up to date including known service changes at the time of calculation (valid to September 2021) but also reflecting the likely provision to key employment sites such as West Midlands Rail Freight Interchange as per the S106 requirements for these sites.

The rail timetable used is valid from January 2020 so prior to the Covid pandemic. The rail services have changed so frequently over the past 18 months it is not possible to know if the service level at present will continue or whether services will increase back to previous levels. Service levels at Landywood and Penkridge stations are at present roughly the same as they were in terms of frequency back in 2020, but at Codsall and Bilbrook stations the frequency is still reduced compared to January 2020 service levels.

The proposed development site plans were geo-referenced in ArcGIS to provide an indicative site layout which was loaded into TRACC to provide a road/footpath layout allowing the demonstration of accessibility where applicable.

For the access to employment calculation, a revised methodology has been used for some of the job numbers, particularly the job totals in town centres where revised numbers have been provided where known from data supplied by the Economic Development team.

Extra locations such as hospitals have been included as destinations in their own right. Where available, job numbers provided by hospital trusts have been used, or splits between hospital sites used where we have information provided directly by the trust. Where hospital trusts operate more than one site (such as New Cross and Cannock Chase Hospitals) and staff numbers cannot be split, a proportion has been used based on the split supplied for County Hospital in Stafford and Royal Stoke University Hospital.

Other locations which could be accessed via the Midland Metro from Wolverhampton such as West Bromwich, Bilston and Wednesbury have also been included. Job numbers for these towns have been sourced via the Black Country Consortium at MSOA level for each town. These provide additional centres where residents of South Staffordshire could be employed and are able to reach within a journey time of 60 minutes.

For some destination types, such as employment, it is not appropriate to calculate accessibility to the nearest destination point; as the nearest point of employment may not be suitable i.e. lack of job choice. For employment destinations a Hansen score was calculated. This combines the number of destinations that can be accessed within a 60-minute journey time with the disbenefits of travel in terms of journey time and the total number of jobs available at the destination. The higher the score, the greater the level of access and choice. Due to the change in job figures, the data is displayed in six bands rather than quartiles as done previously, to help distinguish the difference in access to the range and number of jobs.

For the supermarket calculations, a review of the destinations used in the previous calculation was done and certain supermarkets have been removed and others added in. This has been done to reflect the change over the previous 18 months due to the

Covid pandemic how people have changed their food shopping habits. Some smaller branches of the Co-op have been included where they might not have been previously.

It is not possible to confirm the pedestrian facilities available on each road and in rural areas it is likely that some walking routes particularly between settlements would not be considered safe for pedestrians and children in particular.

For primary school accessibility calculations; it is more appropriate to calculate accessibility on foot as children who live beyond 2 miles to their nearest primary school are entitled to free transport. This calculation uses the road network and applies an average walk speed of 4.8kph.

Accessibility assessments are presented as a separate enclosure and allow a comparison of the merits of each location, to inform later work should the site(s) be allocated within the plan.

### Connectivity

Cycling and walking routes are an important element of any new housing development to help avoid over reliance on journeys by car, particularly for shorter trips. It is important that the proposed Preferred Option developments within South Staffordshire's Local Plan provide good well-planned walking and cycling routes to key attractions within settlements such as schools, village centres and public transport hubs. In addition, it is important that new developments create pleasant environments for their residents to live in and the provision of nearby attractive leisure routes can help facilitate this. Any new facilities should, where possible, be designed to LTN1/20 standards although the use of lightly trafficked and low speed roads can be acceptable.

Recommended walking and cycling proposals are presented in the enclosed plans to help make the identified sites acceptable from a connectivity standpoint. These have been informed by site inspections (personal and remote), GIS analysis and professional opinion.

Public transport provision is also very important to ensure all residents have access to services and alternatives to private car travel. In some areas it will also be vital to ensuring children can get to their allocated schools.

### Highway Impact (Strategic Housing Site Assessments)

In order to assess the high-level traffic impacts of the large strategic housing sites included within Policies SA1 – SA4, SCC acquired National Highways' (NH), formerly Highways England, SATURN traffic model. This was recently updated to inform their bid for funding for the M54-M6 link and inform scheme design. SCC has further updated this model to include the proposed development at the four strategic housing sites; specifically, **1,329** new homes (including **200** already consented) to the north of Penkridge; **1,200** at Cross Green; **1,200** at Linthouse Lane; and **848** at Bilbrook together with **317** planned for Codsall, making a total of **1,165**. In addition, the proposal for Brinsford Parkway railway station (with around 500 car park spaces) was included in the model, given its close links with the strategic housing site at Cross Green.

In order to represent each development in the model, an existing trip distribution from similar adjacent zones was replicated and factored by the number of peak hour development trips that each development is likely to generate. This trip rate was derived from recent extensive surveys and Transport Assessments in various areas of South Staffordshire, namely Perton (2 no.), Penkridge and Cheslyn Hay. This was considered to provide a representative trip rate for these large strategic site proposals. To put this into perspective, it would be expected that for every 1000 new houses built there would be around 450 to 500 new trips on the road network. Trip distribution and rates for the Parkway Station car park at Brinsford were estimated with the help of data within the Strategic Outline Business Case which has been prepared to demonstrate the need for a station in this area.

It is important to understand the history of the SATURN model and its potential limitations, none of which are considered to affect its appropriateness for the purposes of this exercise which is to provide an overview of highway impacts to determine if there are likely to be any insurmountable problems should the development sites come forward. The original SATURN model is the Midlands Regional Transport Model (MRTM), which was then partially updated to support the bid for funding for the M54-M6 Link Road. SCC were provided with a cordoned version of this model, covering the South Staffordshire and Wolverhampton areas. Due to its strategic nature, some of the network coding is coarse, with some generalisation of the local road network. For example, only one route through Penkridge village, accessed via the A449, is included where there are actually a few route options. In reality, any vehicles on this route are likely to be split over the available routes.

In order to provide cumulative and individual assessments of the likely traffic impacts from all four strategic housing locations across Staffordshire's road network, the updated SATURN model has been interrogated to determine where the introduction of the proposed developments cause a change in traffic of more than 100 2-way trips in the modelled peak hours (0800-0900 hours and 1700-1800 hours). SCC has also provided model results to the City of Wolverhampton Council (CWC) for them to understand the impacts on their network. It is important to note that changes to traffic levels do not only occur due to the proposed development trips loading onto the network; existing trips also re-route as the new trips are accommodated. For example, some existing trips on the A449 (north of Penkridge) appear to switch to the M6 as the A449 becomes more heavily trafficked with 1,329 new homes accessing directly onto it.

### Cumulative Assessment of the Highway Impact of the Proposed Strategic Housing Sites

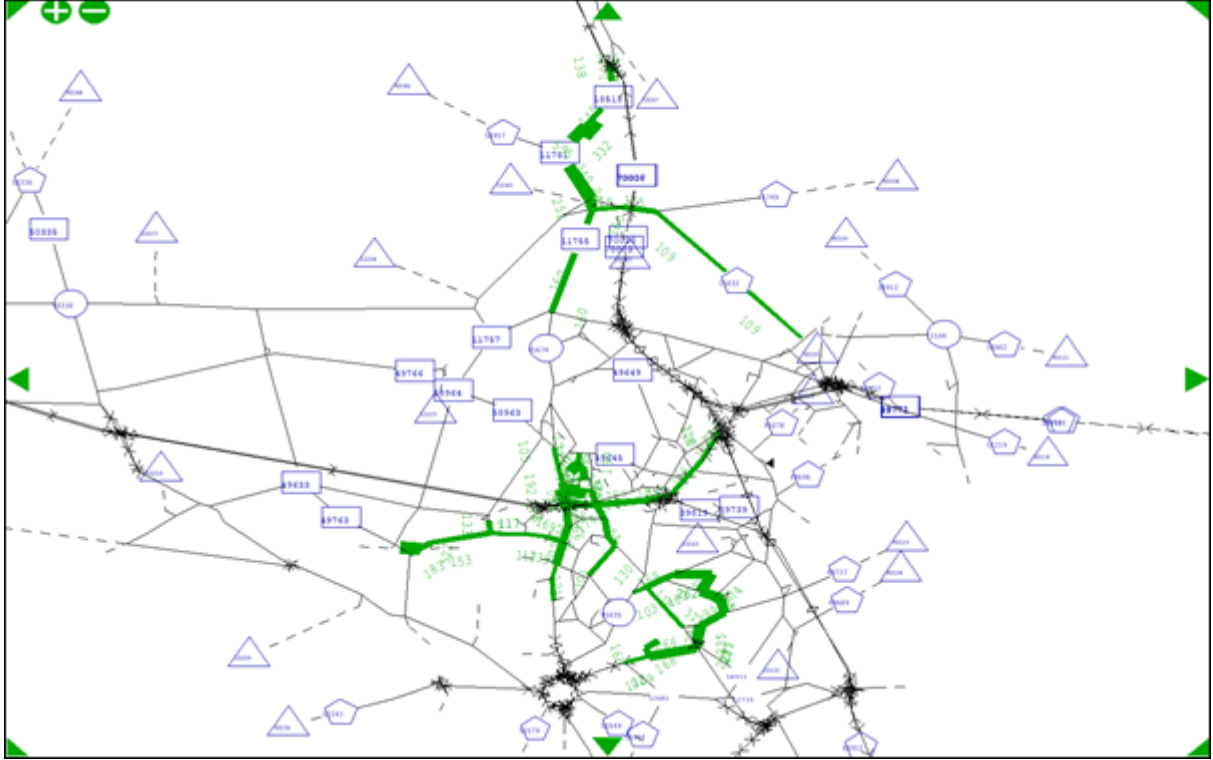
SCC has applied the updated model to provide an overview assessment of the cumulative impact of the four strategic housing sites (1,329 new homes, including the 200 already consented, to the north of Penkridge; 1,200 at Cross Green (plus the 500 space Parkway railway station); 1,200 at Linthouse Lane; and 1,165 in Codsall and Bilbrook.

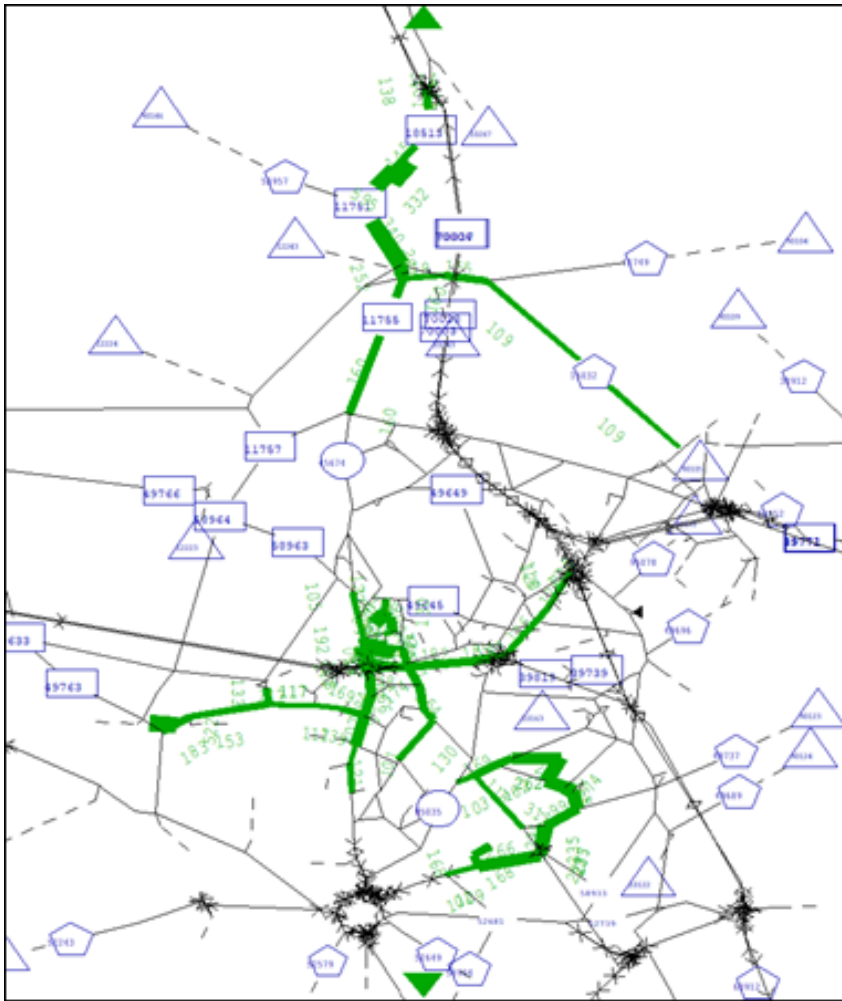
The cumulative assessment shows there are reasonably consistent effects across both the AM and PM peaks. On the whole, changes in traffic levels greater than 100 trips occur in reasonably close proximity to each of the proposed developments, with less impact further away as vehicles disperse through the network. Screenshots from the

model shown below demonstrate this, highlighting the changes in traffic near to Penkridge, Codsall/Bilbrook, Brinsford and Linthouse Lane:

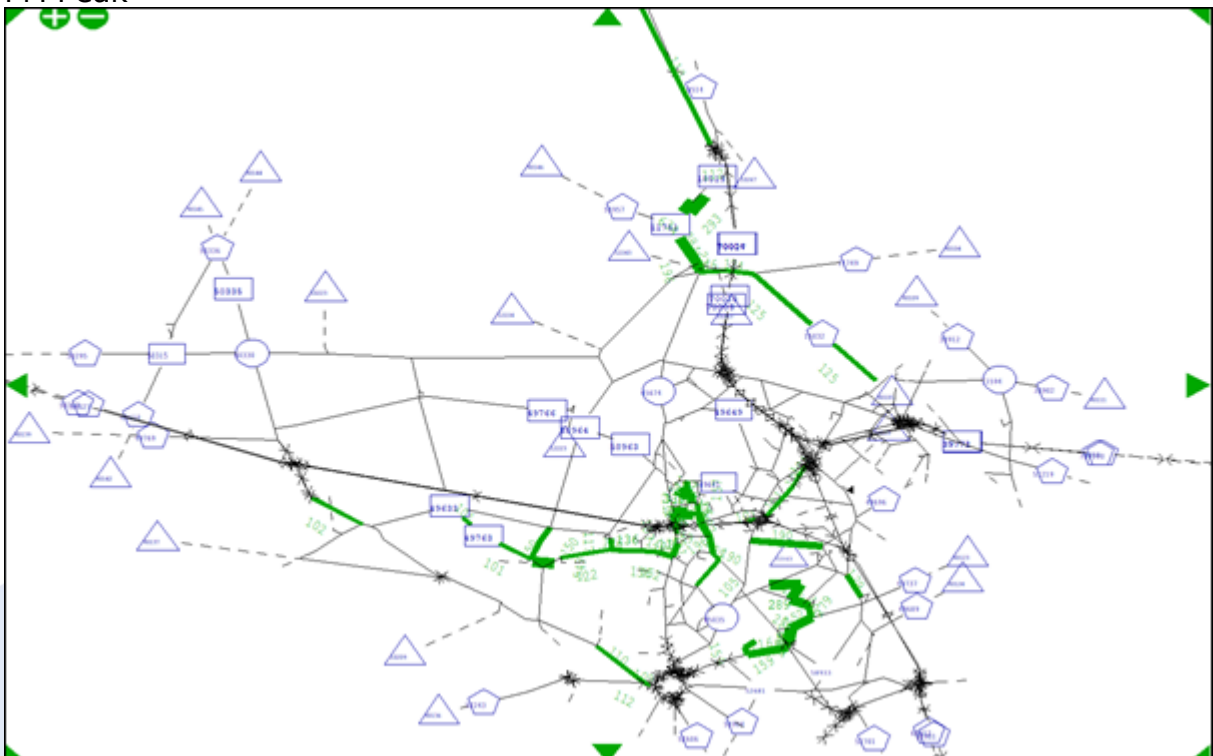
Screenshots Showing Changes in Peak Hour Traffic Levels Along Impacted Routes

AM Peak

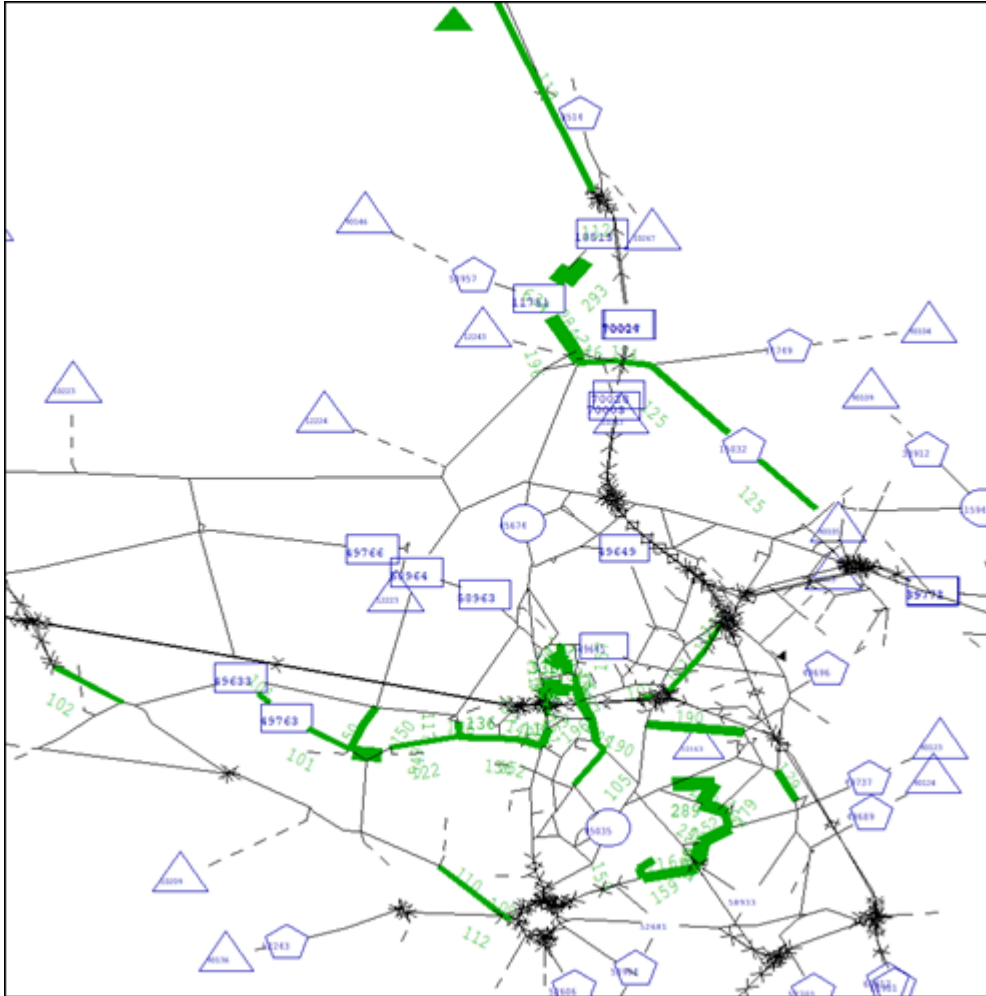




PM Peak







As can be seen, there are significant changes on the following parts of the road network:

AM Peak (0800 – 0900 hours)

- A449 between M6J13 and Gailey;
- Through Penkridge to Cannock via the B5012;
- A449 between Coven (double roundabouts) and the Oxley area of Wolverhampton;
- M54J2 to M6 (via new link road);
- Cat and Kittens Lane and Bushbury Lane (into Wolverhampton);
- Wobaston Road and Pendeford Mill Lane (into Bilbrook); and
- Blackhalve Lane, B4484 Long Knowle Lane, Lichfield Road and Wednesfield Way (all within Wolverhampton's boundary).

PM Peak (1700 – 1800 hours)

- M6J13 northbound;
- A449 between M6J13 and Penkridge centre;
- Through Penkridge to Cannock via the B5012;
- A449 between Brinsford and the Wobaston Road area of Wolverhampton;
- Bognop Road (from A460 to Essington village);
- Cat and Kittens Lane and Bushbury Lane (into Wolverhampton);

- Wobaston Road and Pendeford Mill Lane (into Bilbrook);
- Wood Road (between Codsall and Codsall Wood);
- Albrighton Bypass (south of M54J3);
- A41 as it approaches Wolverhampton ring road; and
- Blackhalve Lane, Lichfield Road, Wednesfield Way and a small section of A462 to the south of Sneyd Lane to Lichfield Road (all within Wolverhampton's boundary).

### Land East of Bilbrook and Land at Keepers Lane and Wergs Hall Road, Codsall (Total of 1,165 dwellings)

Staffordshire County Council has the following comments and observations in response to the strategic site and other proposed allocation(s) in the Bilbrook and Codsall areas. These include 848 new homes on Land East of Bilbrook (covered by Policy SA1) and also 317 homes at Keepers Lane and Wergs Hall Road.

### Accessibility

Please refer to the accessibility plans in the enclosures. None of the sites are within 350 metres of an existing bus service or rail station and consequently do not have access to supermarkets, employment or hospitals by public transport. The whole of both sites are within a 20-minute walk of GP services. The Bilbrook site is within a 10-minute walk of a new first school whilst the Codsall site is within 20 minutes of an existing first school. Both sites are within a 20-minute walk of existing middle schools.

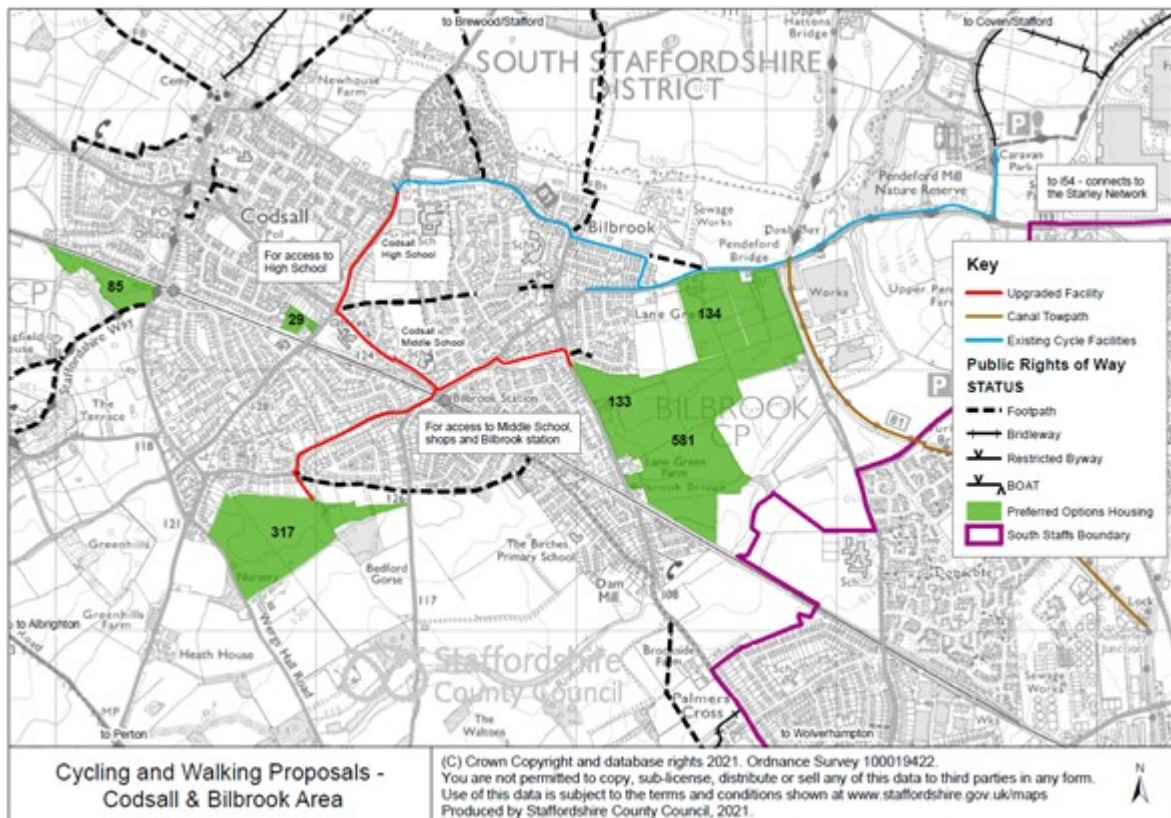
### Walking and Cycling Proposals

The Preferred Option development proposals are for 1,165 new homes in the Bilbrook and Codsall area, spread over the two largest sites. The developers will need to ensure that their sites are well connected to key attractions within the vicinity of the developments including the Middle and High schools, the railway stations and village centres. There may also be opportunities to provide or connect into more attractive leisure routes.

The Cycling and Walking Proposals Plan for Codsall and Bilbrook Area shows the active travel routes that SCC would like to see come forward in support of the proposed new developments. These include:

- Provision or enhancement of a cycling and walking facilities from the southern site onto Suckling Green Lane heading in a north-easterly direction onto Keepers Lane and through the double mini roundabout junction to Wolverhampton Road / Duck Lane. Depending on traffic flows, this could require just signage. The route will provide access from the new housing to Bilbrook train station and the local amenities available here. In addition, in conjunction with the routes below, it will also provide access to the middle and high schools.
- Continuing from above, in a north-westerly direction along Wolverhampton Road, passed Codsall Middle School and the council offices, to Histons Hill traffic lights and then northbound to Codsall High School. A suitable crossing facility will be required as the route switches from the north side of the road to the south.

- Continuation of the route to Bilbrook railway station, heading north-easterly along Duck Lane to Brookfield Road, then along Brookfield Road to Lane Green Road and connecting into the northern site in Bilbrook. A suitable standard crossing facility will be required in the vicinity of Duck Lane / Brookfield Road.
- Connections will be required from the northern site into the existing facilities along Pendeford Mill Lane and beyond.



## Highway Impact

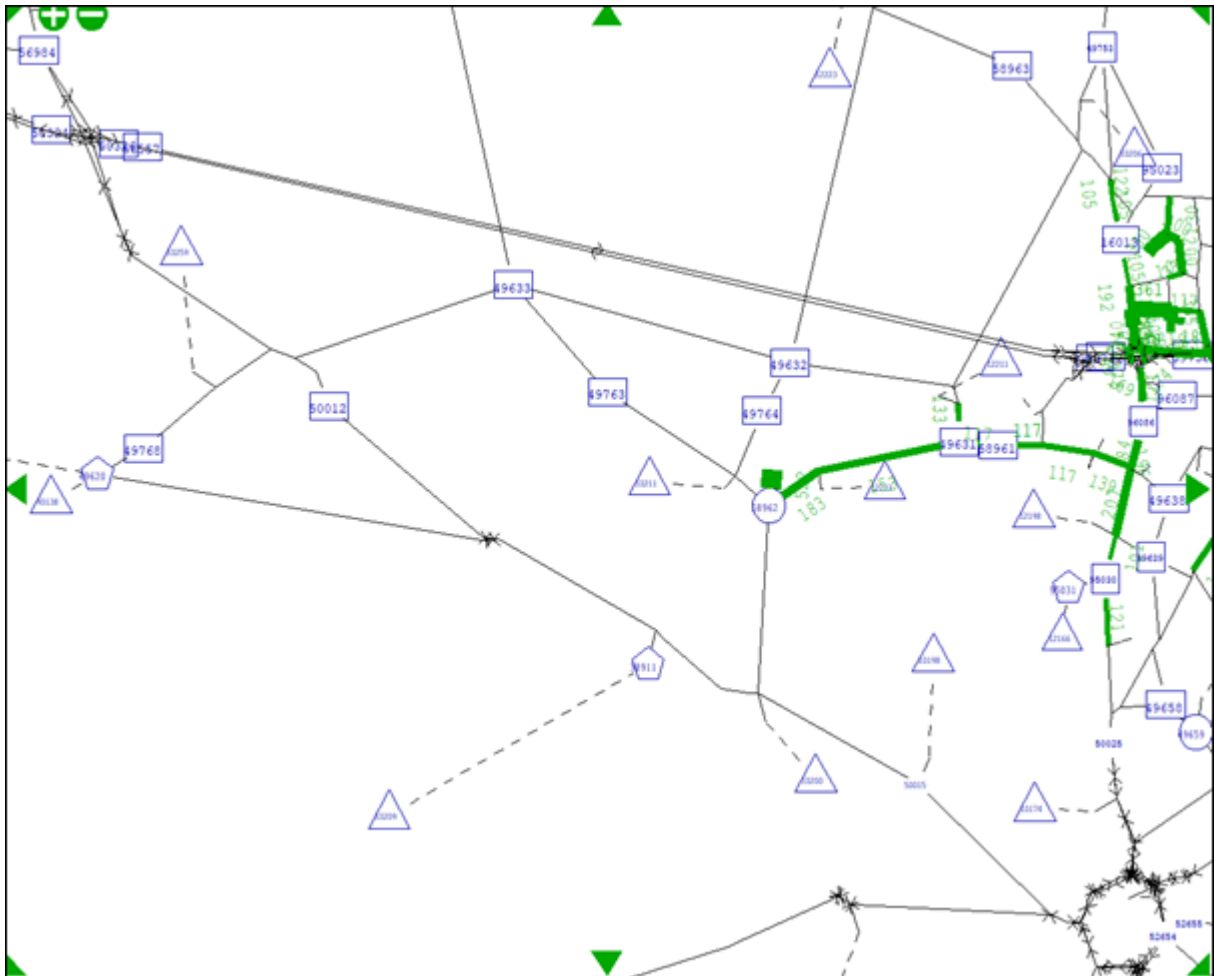
One of the limitations of the SATURN model is that some parts of the network, due to its strategic nature, have been coded 'coarsely' with some generalisation of the local road network. This becomes more prevalent the further away from the A road and Strategic Road Network locations are. As can be seen in the screenshots below, the model network through Codsall and Bilbrook does have a level of coarseness and generalisation. For example, only one route is modelled to the A41, which is intended to represent several potential routes including via Histons Hill, Wergs Hall Road and Keepers Lane. However, the model outputs do give information on the directions of travel that trips from the new developments wish to take so allowances can be made for this. In this case, the impacts on the A41 junctions will be shared rather than accruing at the one place and should therefore be less problematic.

Focussing on the Codsall and Bilbrook areas in more detail, in practice two larger sites make up the majority of the strategic allocation - 848 new homes on Land East of Bilbrook and 317 homes at Keepers Lane and Wergs Hall Road.

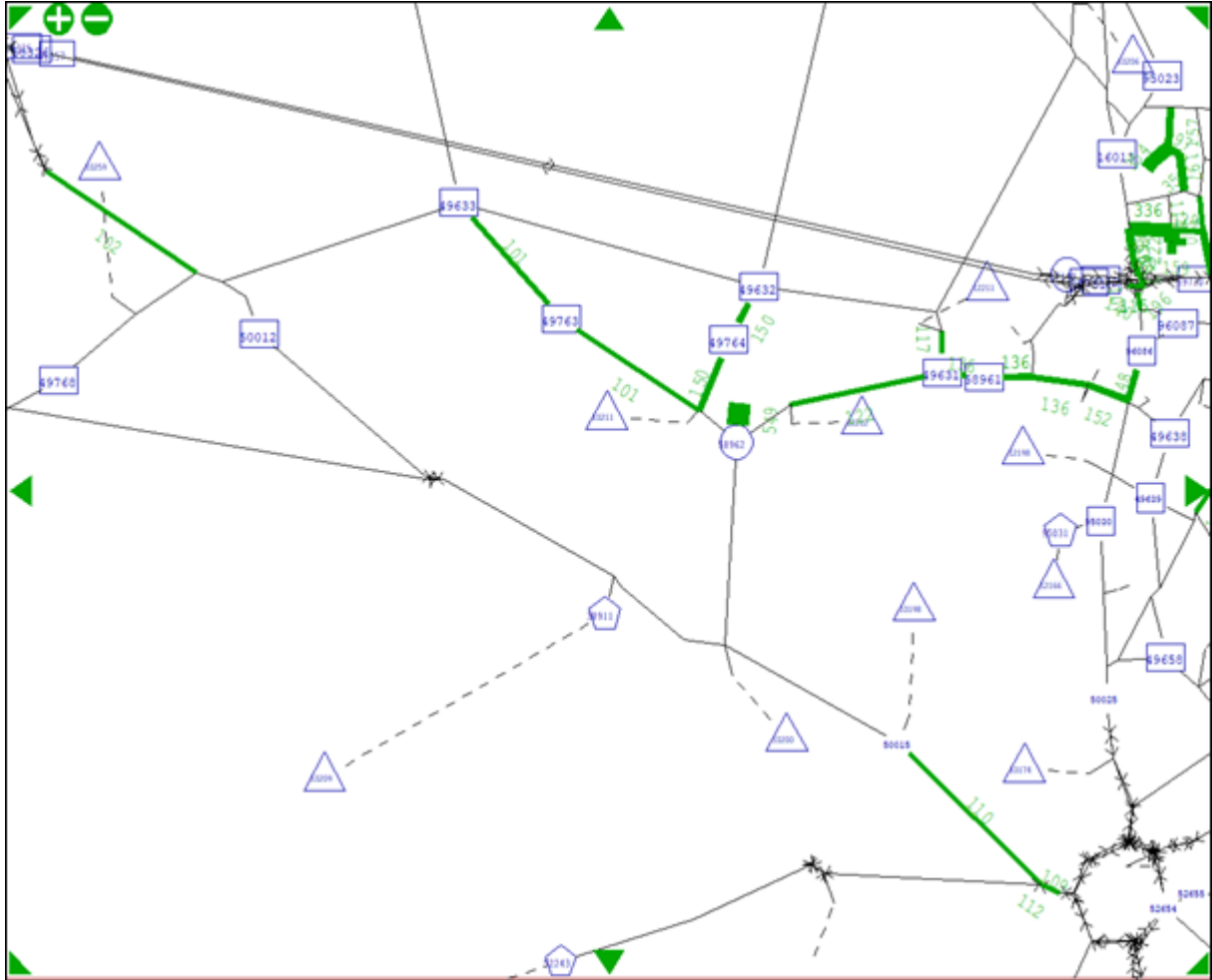
Analysis of the traffic model has shown that there are increases in trips (i.e. greater than 100 2-way trips) in the modelled peak hours (0800-0900 hours and 1700-1800 hours) in the following nearby locations. These are also displayed on the ensuing screenshots:

- A449 between Coven (double roundabouts) and the Oxley area of Wolverhampton;
- M54J2 to M6 (via new link road);
- Wobaston Road and Pendeford Mill Lane (into Bilbrook); and
- Wood Road (between Codsall and Codsall Wood);
- Albrighton Bypass (south of M54J3); and
- A41 as it approaches Wolverhampton ring road.

AM Peak



PM Peak



While the impacts of this development will affect SCC's road network, much of it will be on CWC and NH (National Highways) networks. All three authorities will need to advise on the scope of any Transport Assessments that the developer is required to undertake to ensure that mitigation is provided where necessary.

Increases on the A449 between Wobaston Road and M54 J2, and additional flows on M54 between J2 and the M6 are partly from the sites in Codsall and Bilbrook, but also from Cross Green site and to a lesser extent the Linthouse Lane site.

In terms of Staffordshire's network, it is considered unlikely that there are any impacted locations that could not be mitigated to ensure the network continues to operate satisfactorily.

The developer will need to assess (and mitigate where necessary) the impact of trips at junctions onto the A41, and also several junctions on the route making up Pendeford Mill Lane, Duck Lane, Wolverhampton Road and Histons Hill. Whilst any assessment requirements won't be limited to these, the junctions of Duck Lane / Wolverhampton Road / Keepers Lane / Birches Road and Histons Hill / Elliots Lane / Wolverhampton Road are known to be congested at peak times and are likely to require improvement.

The intention is that the traffic flow information derived from this model is used to inform the scope of the more detailed transport assessment work being prepared by the developers promoting these sites. It is possible to use the model information to estimate the relative contributions towards mitigation where several developments are impacting in a given location.

### Land at Cross Green (1,200 dwellings and Proposed Brinsford Parkway Railway Station)

SCC has the following comments and observations in response to the strategic site at Cross Green (circa. 1,200 new homes, with a Parkway railway station).

#### Accessibility

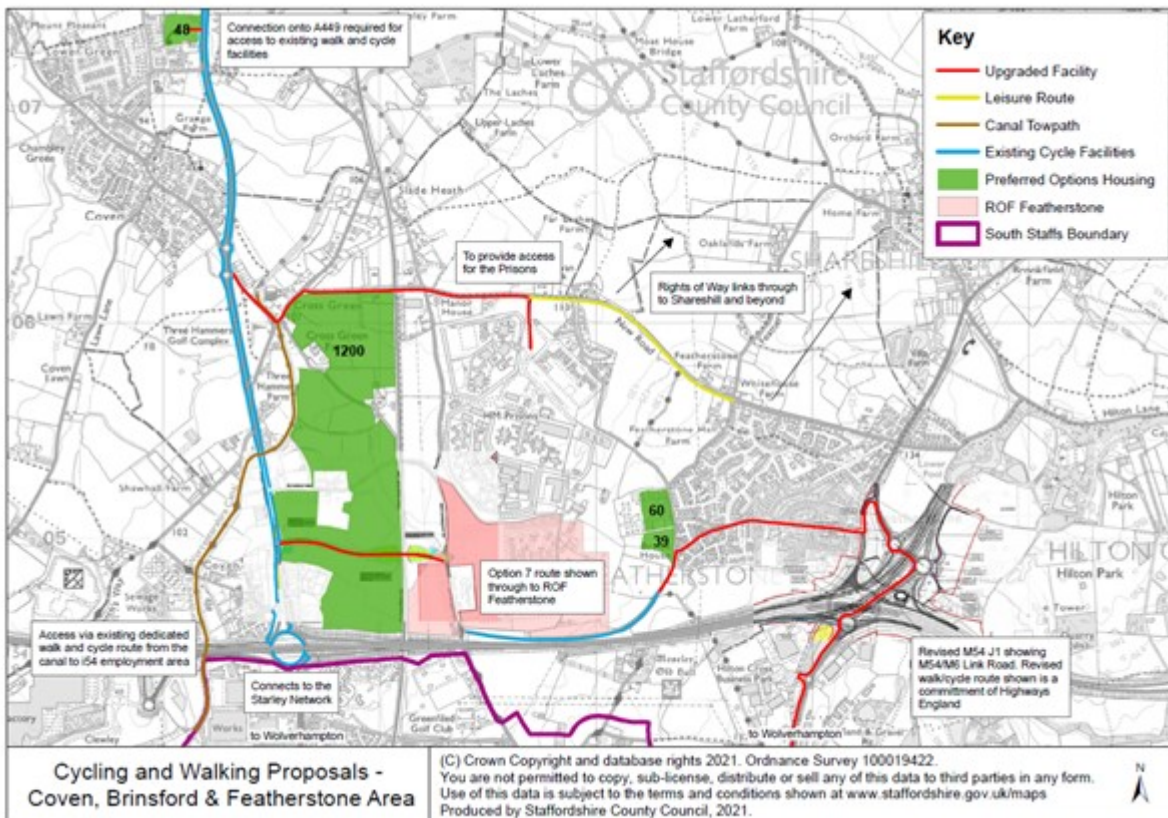
Please refer to the accessibility plans in the attached 'Accessibility Plans.zip' file. Virtually none of the site is within 350 metres of an existing bus service or rail station and consequently does not have access to supermarkets, employment or hospitals by public transport. The whole site is within a 30-minute walk of GP services. Approximately two thirds of the site is within a 10-minute walk of a new first / primary school whilst the remainder is within 20 minutes. It needs to be established whether two tier or three tier education will be operated.

#### Walking and Cycling Proposals

The developer will need to ensure that their sites are well connected to key attractions within the vicinity of the development including schools, the railway station and other nearby local amenities. There may also be opportunities to provide and connect into more attractive leisure routes via the canal and existing footpaths and bridleways.

The plan below (Cycling and Walking Proposals - Coven, Brinsford and Featherstone Area) shows the active travel routes that SCC would like to see come forward in support of the proposed new developments. These include:

- Footway / cycleway provision along Brewood Road, connecting into the existing facilities on the A449 with an improved LTN 1/20 standard junction;
- Footway / cycleway provision along New Road, connecting into the existing employment destinations at and near to the prisons at Oaks Drive;
- Continue footway and cycle provision along New Road, between Oaks Drive and Featherstone Lane (approximately 1km) to provide linkages to various leisure routes which can be accessed to the north of New Road in the vicinity of Featherstone Lane. Providing access to leisure routes will help with placemaking and provide a quality living environment for new residents; and
- Improved access to the Canal towpath at the Dark Lane / Old Stafford Road / Brewood Road junction combined with enhancements to the canal towpath (where required) between The Anchor Inn and I54 employment area. providing connectivity to jobs and the conurbation, taking into account environmental constraints.
- The proposed new road linking the A449 to ROF Featherstone and providing the main access to the Cross Green site, is currently designed with a 3.0m shared footway cycleway facility. To comply with LTN 1/20 this should be redesigned and delivered with a segregated facility



## Highway Impact

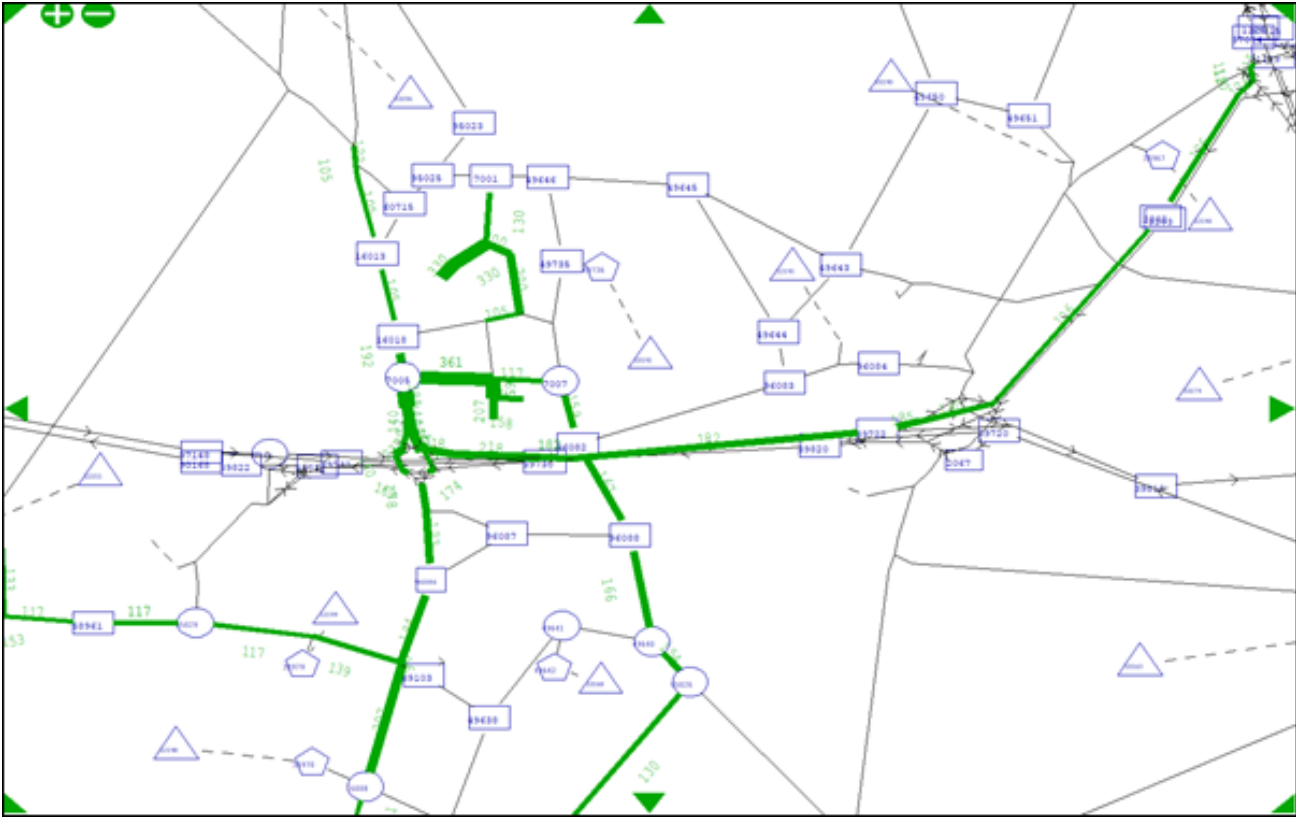
Focussing on the Cross Green area, 1,200 proposed new homes and 500 car park spaces at the Brinsford Parkway station have been included within the SATURN traffic model. Trips from this development will have the choice to access the existing road network via A449, New Road or Cat and Kittens Lane.

There are two new committed road schemes in the area that will affect future route choices and traffic flows. These are a link through this housing proposal from Cat and Kittens Lane to the A449 (to be provided by the developers of ROF Featherstone) and the M54-M6 link, providing relief to the A460 to the east of this development. These are both included within the traffic modelling.

Analysis of the traffic model has shown that there are increases in trips (i.e. greater than 100 2-way trips) in the modelled peak hours (0800-0900 hours and 1700-1800 hours) in the following nearby locations - also displayed on the following screenshots:

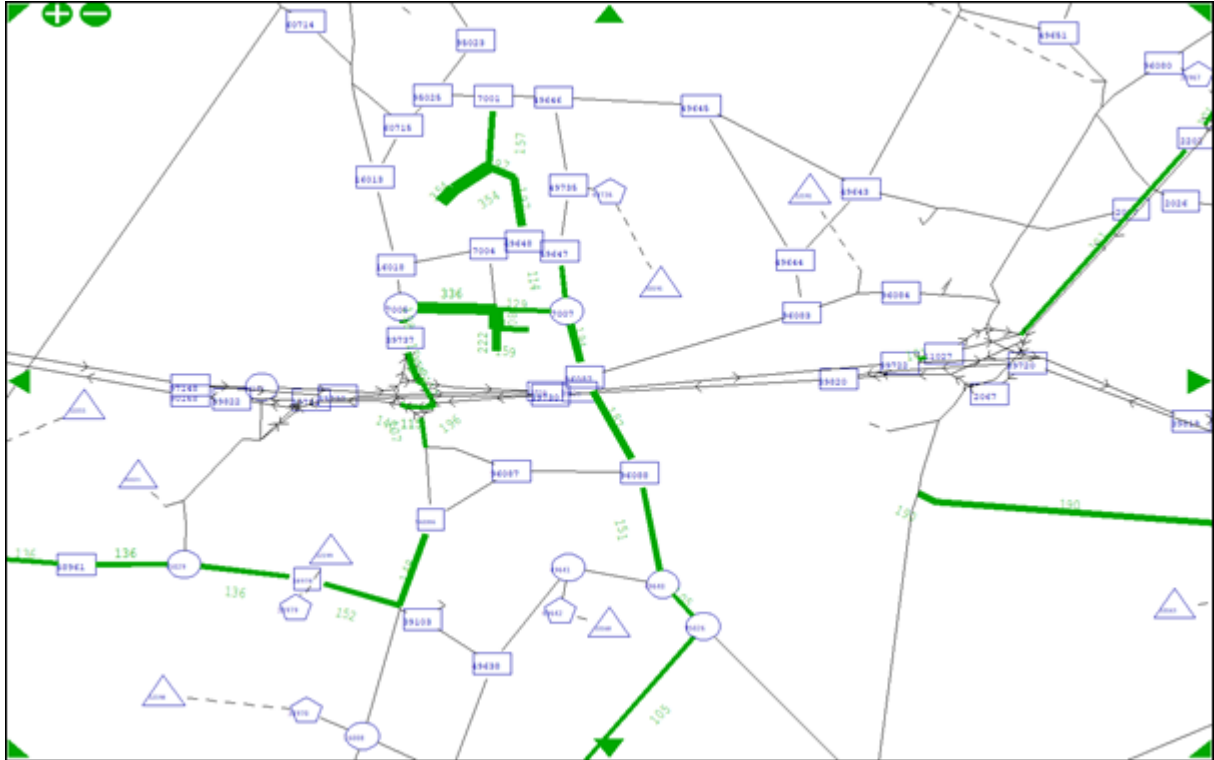
- A449 between Coven (double roundabouts) and the Oxley area of Wolverhampton;
- M54J2 to M6 (via new link road); and
- Cat and Kittens Lane and Bushbury Lane (into Wolverhampton).

AM Peak





### PM Peak



As well as the locations listed above, the screenshots show impacts on Wobaston Road and Bognop Road. However, further investigation of increases on Wobaston Road and Pendeford Mill Lane (into Bilbrook) have shown that this is mainly due to the strategic sites within Codsall and Bilbrook. Increases on Bognop Road are mainly associated with traffic from the Linthouse Lane strategic site.

Increases on the A449 between Wobaston Road and M54J2, and additional flows on M54 between J2 and the M6 are from this site and the Codsall / Bilbrook sites. There is also a smaller impact on the M54 from the Linthouse Lane site.

While some of the impacts of this development will affect SCC's road network, the majority will be on CWC and NH (National Highways) networks. All three authorities will need to advise on the scope of any Transport Assessments that the developer is required to undertake to ensure that mitigation is provided where necessary. In terms of Staffordshire's network it is considered unlikely that there are any impacted locations that could not be mitigated to ensure the network continues to operate satisfactorily.

The intention is that the traffic flow information derived from this model is used to inform the scope of the more detailed transport assessment work being prepared by the developers promoting these sites. It is possible to use the model information to estimate the relative contributions towards mitigation where several developments are impacting in a given location.

### Land off Linthouse Lane (1,200 dwellings)

Staffordshire County Council has the following comments and observations in response to the strategic site off Linthouse Lane.

This site is situated on the edge of the administrative boundary and many of the impacts and proposals may be witnessed in the City of Wolverhampton Council's (CWC) area.

### Accessibility

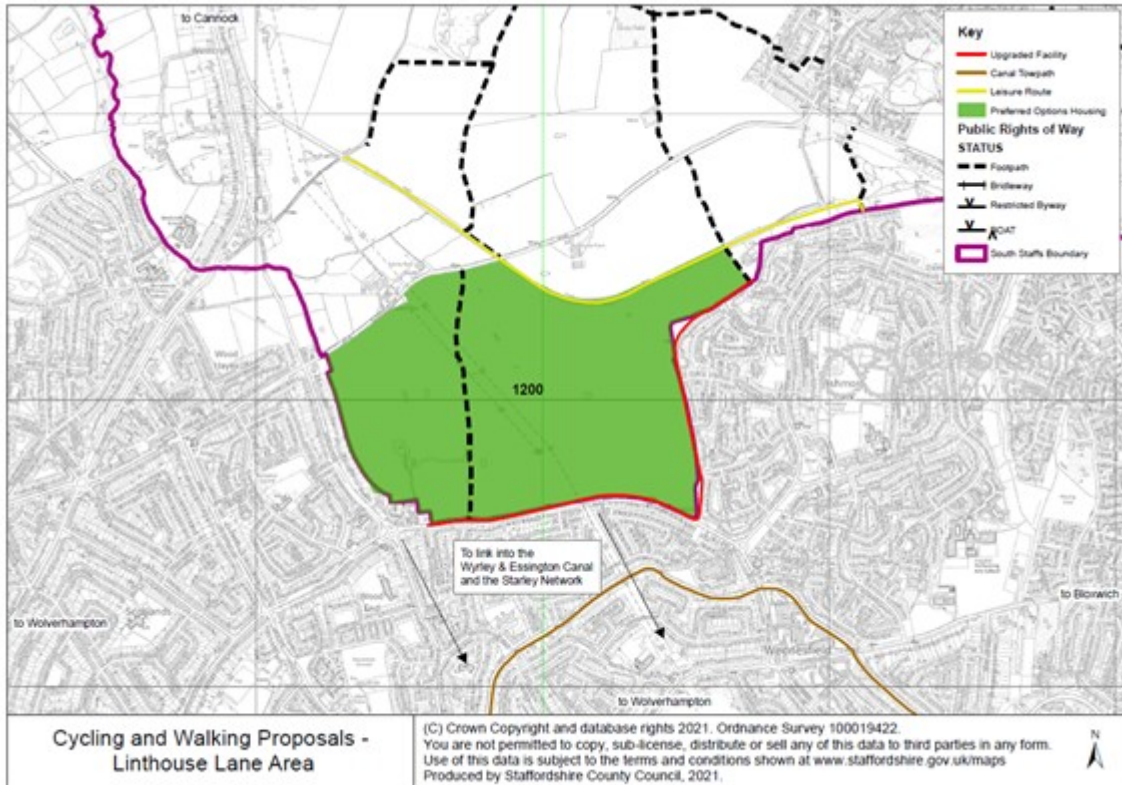
Please refer to the accessibility plans in the attached 'Accessibility Plans.zip' file. The western and southern edges of the site are within 350 metres of a bus service and hence between 11 and 20 minutes access by bus to supermarkets on a weekday and Saturday; have access to a limited choice of employment via bus; and are within 11 to 30 minutes access to hospital by bus. The remainder of the site has no access. The whole site is within a 20-minute walk of GP services and a 10-minute walk of a new primary school.

### Walking and Cycling Proposals

This Preferred Option development proposal is for 1,200 new homes within South Staffordshire but on the edge of Wolverhampton. Most of the impacts of the development will be within the CWC boundary, as will most of the local facilities and amenities used by its residents. The developer will need to ensure that the site is well connected to key attractions within the vicinity of the development and should also consider opportunities to provide or connect into more attractive leisure routes.

Cycling and walking opportunities for this site will largely need to be determined by City of Wolverhampton Council. However, the plan below (Cycling and Walking Proposals – Linthouse Lane Area) shows the active travel routes that SCC thinks should come forward in support of this development. These include:

- Consideration of a segregated cycle/footway on Linthouse Lane and Kitchen Lane and LTN 1/20 crossing provision providing access to residential areas to the west, south and east;
- Good connections to the canal and the Starley Network in the south; and
- Good connections to Staffordshire Railway Walk in the north, taking into account potential land ownership issues.



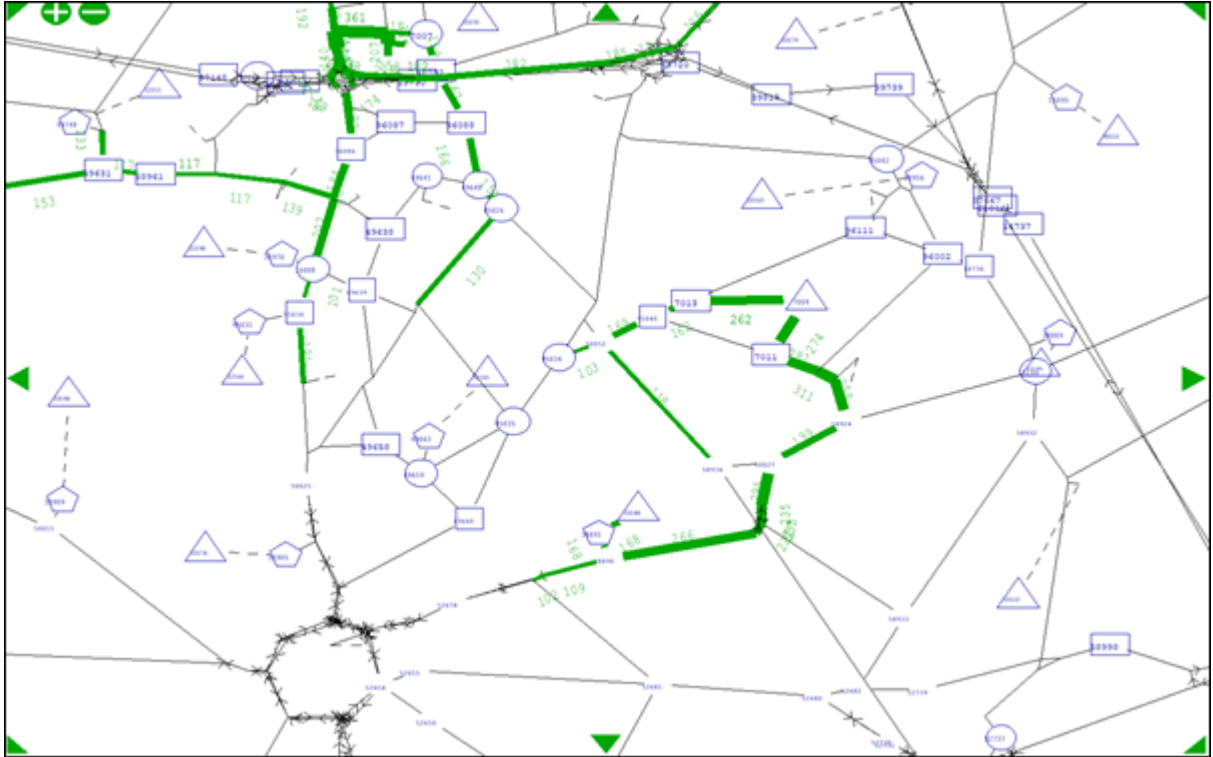
## Highway Impact

Focusing on the Linthouse Lane site in more detail, 1,200 new homes were modelled in the SATURN traffic model with access to the existing road network via Blackhalve Lane and Linthouse Lane.

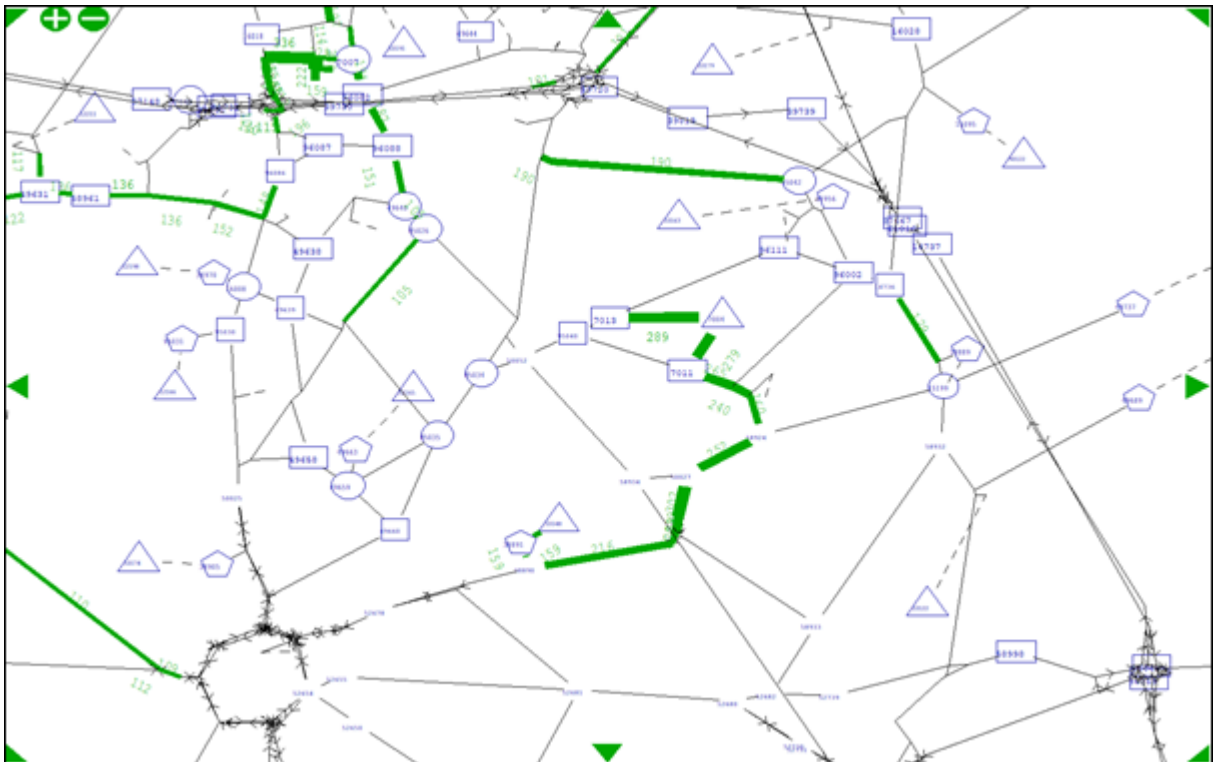
Analysis of the model has shown that there are increases in trips (i.e. greater than 100 2-way trips) in the modelled peak hours (0800-0900 hours and 1700-1800 hours) in the following nearby locations. These are also displayed on the ensuing screenshots:

- M54J2 to M6 (via new link road);
- Blackhalve Lane, B4484 Long Knowle Lane, Lichfield Road and Wednesfield Way and a small section of A462 to the south of Sneyd Lane to Lichfield Road (all within Wolverhampton's boundary); and
- Bognop Road (from A460 to Essington village).

AM Peak



PM Peak



The impacts of this development will affect only small sections of SCC's road network. The majority of the impacts will be seen on CWC's roads and also some of the NH (National Highways) network. All three authorities will however need to advise

on the scope of any Transport Assessments that the developer is required to undertake to ensure that mitigation is provided where necessary.

SCC has shared outputs from the SATURN model with CWC for them to consider the impacts on their network. Please refer to CWC's consultation response for more information.

The traffic Model indicates that increases in traffic flows on the M54 between J2 and the M6 are in some part due to this development, though most of the cumulative impact is from the sites at Cross Green and in Codsall and Bilbrook. In terms of Staffordshire's network it is considered unlikely that there are any impacted locations that could not be mitigated to ensure the network continues to operate satisfactorily.

The developer will need to assess (and mitigate where necessary) the impact of trips on the A460, Bognop Road and travelling through Essington.

The intention is that the traffic flow information derived from this model is used to inform the scope of the more detailed transport assessment work being prepared by the developers promoting these sites. It is possible to use the model information to estimate the relative contributions towards mitigation where several developments are impacting in a given location.

#### Penkridge Area (Penkridge North 1,129 dwellings)

SCC has the following comments and observations in response to the strategic site at Penkridge which includes a site to the north of the village for 1,129 dwellings, accessed directly off the A449. There is also an existing consent in this location for 200 new homes, bringing the overall number of dwellings in this area to 1,329 units.

#### Accessibility

Please refer to the accessibility plans in the attached 'Accessibility Plans.zip' file. Approximately 50% of the site is within a 350 metre walk of a bus stop. This proportion of the site is within a 10-minute bus journey to a supermarket on a weekday and a Saturday; has access to a limited choice of employment via bus and rail; and is within a 40-minute bus journey to a hospital. Most of the site is within a 30-minute walk distance of GP services. Most of the site is within a 10-minute walk of a new first school and a 40-minute walk of Penkridge Middle School.

#### Walking and Cycling Proposals

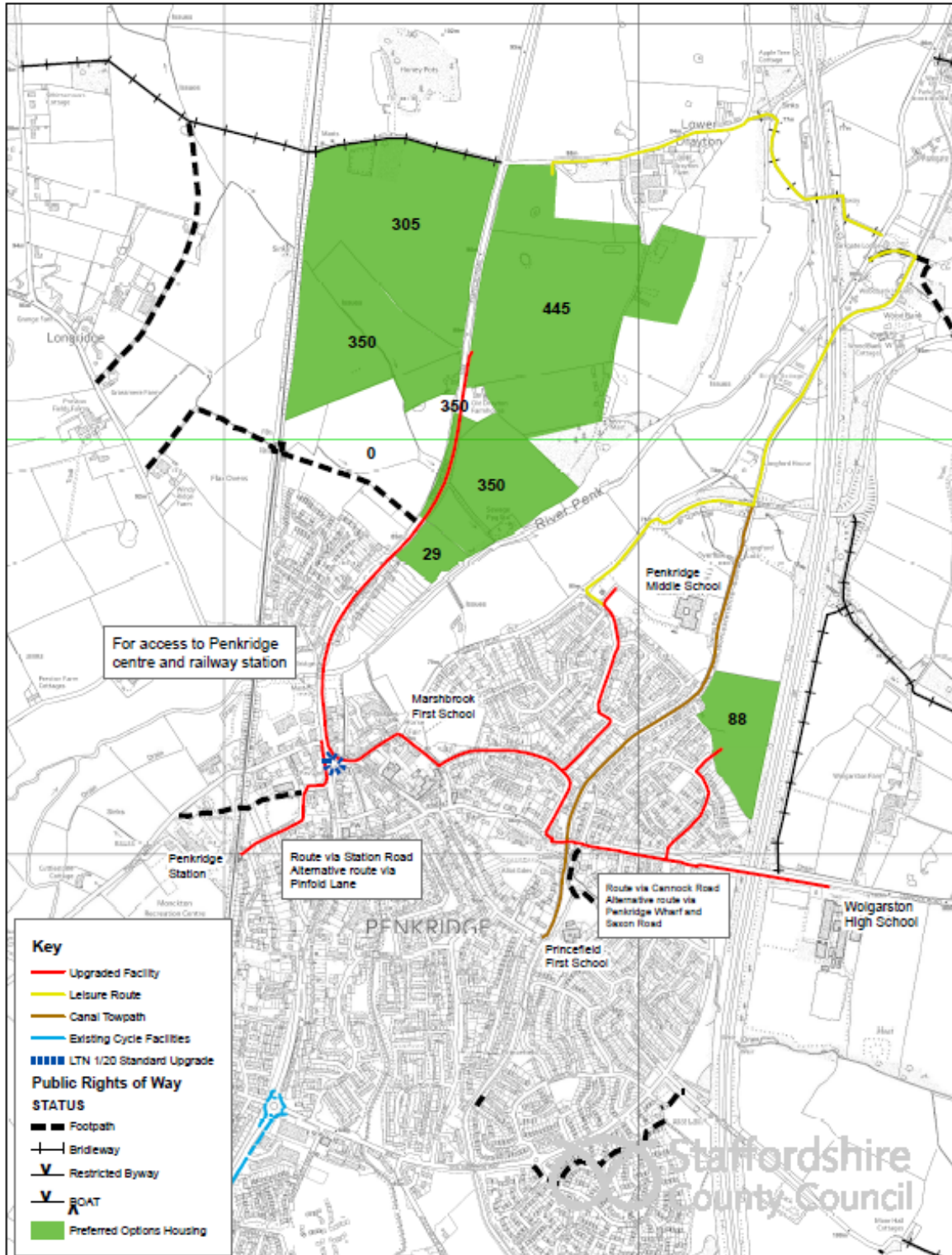
The developer will need to ensure that the site is well connected to key attractions within the village such as the Middle and High Schools, the village centre and the railway station. There are also opportunities to provide more attractive leisure routes from the site to the village via the canal and existing footpaths and bridleways.

The plan below (Cycling and Walking Proposals – Penkridge Area) shows the active travel routes that SCC would like to see come forward in support of the proposed new developments. These include:

- Shared footway / cycle provision along the A449 from a crossing facility at the southern parcel of the development to Crown Bridge junction;

- Connections from Crown Bridge to the railway station, via St. Michael's Square and Station Road;
- Connections from Crown Bridge to the Middle School, via Mill Street, Bell Brook, Haling Road and Marsh Lane; and
- Connections to the High School from Haling Road and Cannock Road.
- The more attractive leisure route would head east out of the northern site, under the M6 via an existing crossing and joining the canal near Teddesley and heading south towards the village, with a spur off to the Middle school. Upgrades to towpaths and footpaths/bridleways would be required.

### Cycling and Walking Proposals - Penkridge Area



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## Highway Impact

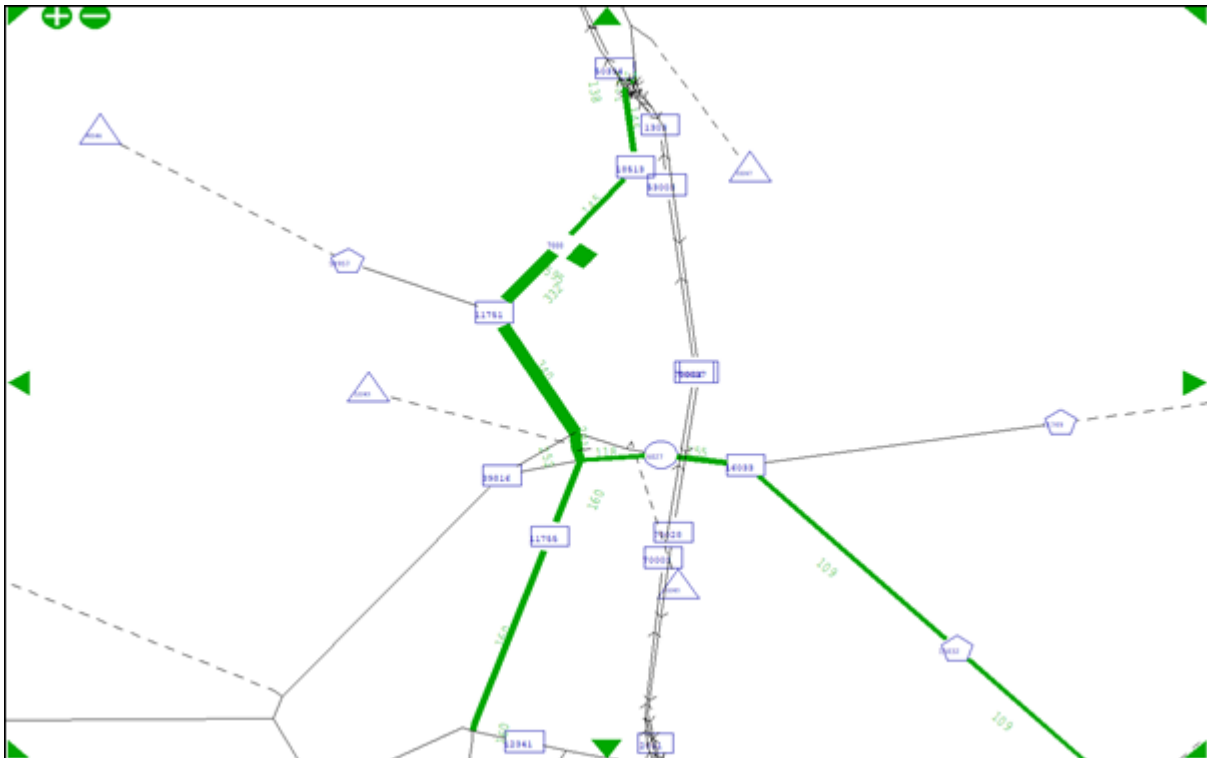
Focussing on the Penkridge area, 1,329 new homes have been included in the traffic model, loading directly off the A449 to the north of the village centre. This includes an allocation of 1,129 new homes plus 200 which already have consent but were not included in the existing traffic model. A smaller site for 88 dwellings (Land at Cherrybrook) has not been included in this strategic modelling exercise.

Analysis of the traffic model has shown that there are increases in trips (i.e. greater than 100 2-way trips) in the modelled peak hours (0800-0900 hours and 1700-1800 hours) at the following locations. These are also displayed on the screenshots below:

- M6;
- A449 (from M6J13 to Gailey); and
- through Penkridge towards Cannock.

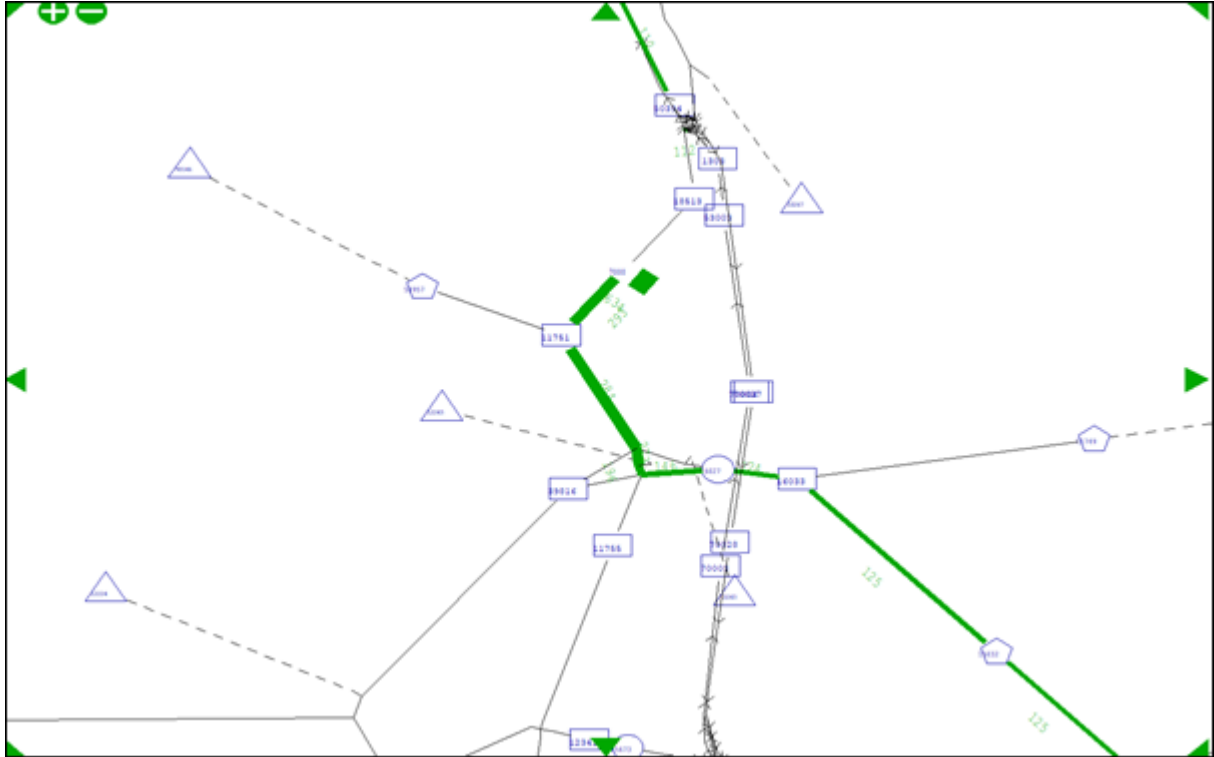
Most of these increases will be due to trips from the Penkridge site, although a small number of them will have originated from the other strategic sites contained within the model.

### AM Peak





### PM Peak



There is an increase of around 150 2-way trips on the A449 between the site and M6J13 in the AM peak, slightly less in the PM peak. The developer will need to provide an assessment of M6 J13 to see whether any mitigation is required.

To the south on the A449, there are around 300 to 350 additional 2-way trips between the development and the centre of the village. The traffic disperses as it leaves the village, with some trips terminating within the village, some travelling to and from Cannock (around 150 2-way trips in each peak hour) and some heading towards Gailey (just over 150 2-way trips in the AM peak, much less in the PM).

This additional traffic on the A449 will put pressure on the side roads and the ability for vehicles to exit from them. The developer will need to assess the capacity of various junctions along the route through the village. The main junction in the centre of Penkridge at Stone Cross is highly likely to require an improvement, and potentially other junctions such as the A449 / New Road. In addition, routes through the village towards Cannock will need to be assessed. Gailey island has been problematic for many years and will require an assessment. The proposed nearby freight depot will also add traffic at this location. However, the introduction of the new M54-M6 link road should relieve some pressure at the roundabout and the additional trips are unlikely to cause any unsurmountable problems.

None of these increases are considered to be at a level that would cause unsurmountable problems and a thorough Transport Assessment will be required from the developers to understand what mitigation would be required to ensure the network continues to operate satisfactorily. The intention is that the traffic flow information derived from this model is used to inform the scope of the more detailed transport assessment work being prepared by the developers promoting these sites. It is

possible to use the model information to estimate the relative contributions towards mitigation where several developments are impacting in a given location.

Pp 53 Policy SA1 – Strategic Development Location : Land East of Bilbrook.

Pp 54 Policy SA2 – Strategic Development Location : Land Cross Green.

Pp 55 Policy SA3 – Strategic Development Location : Land North of Linthouse Lane.

Pp 56 Policy SA4 – Strategic Development Location : Land North of Penkridge.

SCC welcomes the preparation of Supplementary Planning Documents (SPD) and Infrastructure Delivery Strategies (IDS) to inform the release and phasing of these strategic sites. As referred to above, Staffordshire County Council has been working in partnership with SSDC, undertaking technical work to help show how these large housing allocations could be made acceptable in transport terms and this information can help inform the SPD and IDS.

Pp 57 Q7 SCC supports the proposed housing allocations in policies SA1-SA4 as long as they are supported by a robust evidence base that demonstrates how they can be made acceptable in transport terms. SCC has been working with SSDC to provide high level assessment work to help identify any showstoppers from a capacity, accessibility and connectivity perspective. This work will be presented in the 'Transport Impacts (with SCC) 2022' report.

b) 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. Yes – from a transport acceptability perspective, the policy, vision and master planning needs to be developed at the earliest opportunity informed by the technical work referred to, supplemented by evidence provided by site promoters.

#### Pp58 Housing Allocations

pp 58 – pp 59 - Policy SA5 proposes housing allocations for settlements in Tiers 1-4 and other sites adjacent to neighbouring towns and cities (Stafford – Weeping Cross – 168 units and CWC Langley – 390 units). Appendix C contains housing allocation maps and proformas. It is noted that all of the proposed accesses just refer to vehicles and pedestrians, with no reference cycle access.

Pp 60 Q 8. SCC has reviewed the sites within Policy SA5 from a development management perspective and provided comments already regarding their potential to be served from the highway. Plans showing relative accessibility have also been produced for the majority of these sites.

Plans showing recommended and potential walking and cycling improvements to provide necessary connectivity have also been produced and are enclosed. These should be used to guide further assessment work should the sites be allocated.

SCC will expect each developer to engage with our Development Management section to scope out a Transport Assessment and identify any mitigation that is required to make the developments acceptable in transport terms. It is not envisaged at this stage that there would be any unsurmountable problems that would stop these sites coming forward through the Local Plan process.

#### Pp 63 Employment

Policy SA7 concerns the Employment Allocation – West Midlands Interchange.

Pp 65 Q 10 - SCC was an active participant in the Development Consent Order (DCO) process leading to the grant of planning consent and supports the proposed allocation having agreed the necessary mitigation to make development here acceptable in transport terms.

#### Pp 66 Development Management Policies.

Pp 66 para 6.4. It is noted that policies do not reflect the final wording but highlight key requirements, aims and measures that the final submitted policies will deliver.

#### Pp 71 HC9 – Design requirements

South Staffordshire Design Guide 2018 requires updating to reflect Cycle Infrastructure Design (Local Transport Note 1/20), Department for Transport, 2020, as advised by the National Model Design Code that refers to LTN 1/20 as detailed guidance that should inform local design codes. The five core design principles in LTN 1/20 are essential requirements that developers need to take into account. Based on best practice, routes should be Coherent; Direct; Safe; Comfortable and Attractive. By encompassing LTN 1/20 standards within South Staffordshire's Design Guide, developers will be aware of what is expected in Design and Access Statements and site-specific masterplans. This will ensure that high quality pedestrian and cycle facilities are regarded as an essential component of all site access and off-site highway works.

Pp 72 HC12 Parking Standards – the approach to electric vehicle charging for new development is welcomed to help reduce the impacts of climate change.

Pp 76 HC19 Wider green infrastructure design principles – the approach is welcomed to promote active travel.

Policy HC19 recognises the need to ensure that active travel opportunities are met within green infrastructure. It should be reflected in the Green Infrastructure SPD that delivery of this policy may require the upgrade of bridleways, footpaths and canals to provide high quality off-road provision for both pedestrians and cyclists to improve connectivity between development sites and local facilities/schools.

#### Pp78 Economic Vibrancy, Building a strong local Economy

EC1 Sustainable economic growth. The approach regards the promotion of active travel measures and multifunctional green spaces is welcomed but the policy needs to mention the requirement for public transport access to employment land.

SCC is concerned that the importance of Freight Infrastructure has not been sufficiently recognised.

SCC agrees that South Staffordshire is an attractive location for commercial development with a diverse range of small, medium, and large businesses and firms and its potential role in meeting the unmet employment needs of neighbouring authorities. We recognise the ambition to continue support and development of strategic employment sites including at i54 South Staffordshire, ROF Featherstone and West Midlands Interchange leading to greater inward investment and prosperity. We also note the concerns relating to the concentration of large scale developments, such as the West Midland Interchange (WMI) strategic rail freight interchange, which may pose a threat to the district in terms of the cumulative impact on the surrounding infrastructure.

We also recognise the importance of considering growth options in relation to their impacts on the highway network and how these are mitigated including the impacts of increased HGV usage and ability to park safely and securely.

HGV parking should be included as an example within policy EC1 – Sustainable Economic Growth which identifies support for provision of necessary infrastructure.

Pp 81 Community Services Facilities and Infrastructure

Policy EC9 - Infrastructure also identifies SSDCs willingness to work with partners to enable, support and co-ordinate delivery of infrastructure to support growth and infrastructure requirements within the Infrastructure Delivery Plan.

It is suggested that the Staffordshire Freight Strategy 2019 is referred to as a key evidence document within the Preferred Options report it can be found via the following link:

<https://www.staffordshire.gov.uk/Transport/transportplanning/localtransportplan/Documents/Staffordshire-Freight-Strategy-June-2019-final-version.pdf>

We are aware of critical shortages of HGV parking and driver welfare facilities across Staffordshire including South Staffordshire District. The Department for Transport National Survey of Lorry Parking 2017 identified that this HGV parking shortage is experienced across the region. Government too has recognised the critical importance of infrastructure to support hauliers and the logistics sector. In a ministerial statement of 8<sup>th</sup> November 2021 Government stated the planning system should play its part in meeting the needs of hauliers and addressing current deficiencies. Setting out proposals for short term measures and commitment to update both the National Lorry Parking Survey and Highways Circular 02/2013 The Strategic Road Network and the delivery of sustainable development.

Planning policies and decisions should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance. Proposals for new or expanded distribution centres should make provision for sufficient lorry parking to cater for their anticipated use.

The National Planning Policy Framework (NPPF) identifies two specific matters in relation to HGV parking:

1. the provision of overnight lorry parking facilities through planning policies, which should either propose sites or provide a supportive policy framework for anyone wanting to develop a lorry park. Key here is 'local shortages' where the highway authority will liaise with LPAs to ensure their plans make provision for lorry parks;
2. logistics sites should have adequate parking provision –existing sites may have parking but it is mostly operational i.e. part of the loading/unloading process. Other provision may be needed, similar to that proposed at the West Midlands Interchange not simply based on spaces per sq. m.

HGV parking areas are an important element of the logistics network and provide vital rest areas for drivers, help ensure safety for all road users and provide much needed security for transported goods, vehicles and drivers. These should be considered for inclusion within the reviewed Infrastructure Delivery Plan as they can be considered essential to support growth proposals.

HGV parking and driver welfare facilities are not specifically identified within the Preferred Options Plan and we feel this is an omission given the National Policy and the recent Ministerial Statement. Options for provision of facilities for HGV should be considered and identified for the next iteration of the Local Plan. We would be happy to provide support where required.

Pp 81 EC11 Sustainable transport – approach generally welcomed but the policy needs to support the delivery of Staffordshire's Bus Service Improvement Plan (BSIP) which also needs to be listed as key evidence.

#### Note on SCC LCWIP Process

Staffordshire's Local Cycling and Walking Infrastructure Plan (LCWIP) 2021 covers Burton upon Trent, Cannock, Lichfield, Newcastle-under-Lyme, Stafford and Tamworth. In 2021/22 the LCWIP is being expanded to include other medium-sized towns including Cheslyn Hay/Great Wyrley/Landywood. The LCWIP appraisals follow the methodology outlined by Department for Transport guidance. GIS analysis determines the routes that are likely to have the highest demand for cycling by mapping origin and destination points for commuter, school trips and forecast trips to/from development sites. These routes are further prioritised based on proximity to employment (including town centres), rail stations and accident data. The routes identified through the analysis are audited to determine a proposed coherent cycle network. Core walking zones focused on town centres are also assessed in terms of attractiveness, comfort, directness, safety and coherence. The outcome of the 2021/22 appraisals will be reported in an updated LCWIP due to be approved and published in 2022/23 and further updates will be made as resources permit.

Pp83 Under Key Evidence:

- add 'Brinsford Parkway Station Strategic Outline Business Case'.
- Delete Staffordshire Local Transport Plan 2011 and replace with South Staffordshire District Integrated Transport Strategy (to 2038) #

- Add Staffordshire Freight Strategy 2019
- Add Staffordshire's Bus Service Improvement Plan (BSIP) 2021

#The District Integrated Transport Strategy will be updated to reflect the emerging Publication Plan and will inform the next revision to the Infrastructure Delivery Plan.

Pp 92 Q 11 - do you agree with the proposed policy approaches set out in Ch 6?

Please see transport comments provided.

Q12

Do you agree that DS1-DS4 and SA1 – SA7 are strategic policies a) yes  
b) are there any other policies in Ch 6 that need to be identified as strategic policies?  
No.

Pp 96 Appendix B Strategic Masterplanning Location Proformas Land East of Bilbrook

The proforma plan should show the proposed link road between Pendeford Mill Lane, Barnhurst Lane and Lane Green Road.

## Education

Staffordshire County Council (SCC) has a statutory duty to ensure that there are sufficient school places to meet the needs of the population. The School Organisation Team (SOT) acts on behalf of the Local Authority to carry out this duty and to ensure that resources are used efficiently.

The district of South Staffordshire is made up of four distinct areas for the purpose of school place planning: 1) Cheslyn Hay & Great Wyrley, 2) Kinver & Wombourne, 3) Codsall & Perton and 4) Penkridge. These areas are broken down into smaller 'school place planning areas' and are used to plan the number of school places required. These school place planning areas have been grouped based on the geographical location of schools, and by assessing pupil movement between schools and catchment areas in line with Department for Education guidance.

A two-tier education system, with Primary (4-11 years) and Secondary (11-18 years) schools, operates in Cheslyn Hay & Great Wyrley and Kinver & Wombourne, whilst in Codsall, Perton and Penkridge, a three-tier system with First (4-9 years), Middle (9-13 years) and High (13-18 years) schools, operates.

Sixth form provision is offered on site at all secondary and high schools within the district.

SOT has been working with South Staffordshire District Council to devise a strategy to aid their Local Plan aspirations. We expect that this will continue as the Local Plan progresses.

There has already been a total of 750 dwellings that have been delivered from 2018 to 2021. It is noted that SSDC are proposing to make provision for at least 4,131 dwellings between 2021 and 2038 which will equate to an annual requirement of around 243 dwellings. SSDC are also looking to deliver a proportion of the unmet

need of the Greater Birmingham Housing Market Area (GBHMA) which is an additional 4,000 dwellings. The number of dwellings proposed influences what additional school places would be necessary and whether this would take the form of expanding existing local schools and/or the provision of new schools.

The Local Plan should help to ensure that there is sufficient education infrastructure available to mitigate the impact of the proposed new homes in the right place at the right time. SCC would request that land is allocated for educational infrastructure when considering areas for development. Whether this is land adjacent to existing schools, land within a large, proposed development or land within a number of proposed developments.

To mitigate the indicative minimum dwelling numbers in tiers 1-3 villages (including the areas adjacent to neighbouring towns and cities) a total of 632 first school places, 1,067 primary school places, 506 middle school places, 762 secondary school places, 379 high school places and 279 post 16 places are required.

There are a further 288 sites in rural and tier 4 -5 settlements and 450 windfall sites: a total of 738 dwellings. Dependent on location a total of 111 first school places, 155 primary school places, 89 middle school places, 111 secondary school places, 66 high school places and 22 post 16 places are required.

It is appreciated that the Local Plan Review document sets out indicative levels of growth in each area, some mitigation for existing sites has already taken place and we have sought to provide some commentary on the locations for proposed growth at the end of this section. It should be noted that the numbers given above do not include additional Nursery provision or additional SEND provision. Provided below are some general principles that should be considered in the site selection process when determining scale of growth, location of sites and potential policy considerations.

School sizes are referred to in as Forms of Entry (FE), which are the number of classes of 30 per school year group. For example, a 2FE school would have 2 classes of 30 pupils in every year group (60 pupils per school year group). It is also possible for schools to operate at half forms of entry for example 1.5FE equals 45 children per year group, and in these instances, schools operate with classes that are mixed across year groups.

From an educational perspective some schools and governing bodies believe that teaching children from two age groups in one class (mixed age teaching) is beneficial to the pupils. However, there are many educators who don't believe this is the most appropriate method to organise and teach pupils, as it can present challenges due to the differences in ages and abilities which can affect learning outcomes.

Within the district 28 of the 46 schools physically located in the area are Academies or Free Schools, and this number is growing all the time as new free schools open, or maintained schools convert to or become sponsored academies. Academies and Free Schools are independent from the local authority and the Academy Trust would be the decision makers for any proposed expansions.

Irrespective of school governance it is important that the views of schools, Trusts and governing bodies are considered when proposing expansions or new schools, especially where this would require a different class organisation than currently being used. Currently we believe that any options that require a school to organise into mixed age teaching would not be the preferred option by the majority of schools.

A development or a combination of small developments of 750+ dwellings in an area may trigger the need for a new first/primary school and a development of around 5,000 dwellings a new secondary school. A 0.5FE (15 places per year group) expansion to an existing school could be considered for developments of up to 500 dwellings.

Any new first school(s) would need to be at least 1FE (150 places) plus nursery provision and would require land of 7,635m<sup>2</sup> to be provided and allocated within the local plan to facilitate this. To deliver a new 1FE First School (150 places + nursery provision) would cost in the region of £5 million pounds (as at Q4-2020). A 2FE First School (300 places + nursery provision) would require land of 12,870m<sup>2</sup> to be provided and allocated within the local plan to facilitate this and would cost in the region of £6.9 million pounds (as at Q4-2020).

Any new primary schools would need to be at least 1FE (210 places) plus nursery provision and require land of 11,415m<sup>2</sup> to be provided and allocated within the local plan to facilitate this. To deliver a new 1FE Primary School (210 places + nursery provision) would cost in the region of £6,045,195 million pounds (as at Q4-2020). A 2FE Primary School (420 places + nursery provision) would require land of 20,430m<sup>2</sup> to be provided and allocated within the local plan to facilitate this and would cost in the region of £9.5 million pounds (as at Q4-2020).

Any new secondary schools would need to be at least 5FE (750 places) and require land of 86,076m<sup>2</sup> to be provided and allocated within the local plan to facilitate this. To deliver a new secondary school of 5FE would cost in the region of £20 million pounds plus (as at Q4-2020).

The costs above are based on estimated new school costs as at Q4 2020. The building cost multiplier and new school costs are due to be updated and it is anticipated that the estimated cost could increase significantly due to current market conditions. This is a **minimum cost to deliver any new school** and will need to be updated as and when any new school is required.

Where new schools are required the sites would need to be of regular shape, level topography, without significant topographical features that would be considered incongruent with the site's use as a school, free from contamination and other adverse ground conditions, and suitable for the phase of education proposed. Other site requirements will also be required such as (but not limited to) drainage and vehicular access and will be detailed and discussed when appropriate.

Where existing schools have insufficient land to expand on their current site consideration may be given to allocating additional land adjacent to the school to facilitate growth if this is achievable. In addition, any new school proposed may also need to have additional land safeguarded to allow for future growth.



As noted above we will continue to work alongside SSDC to identify the required mitigation for education infrastructure for proposed local plan housing through continued liaison.

Consideration is also required of the implications of proposed housing developments on school transport. Children in the villages/settlements without local schools may be entitled to home to school transport where the catchment or nearest school is over two miles walking distance at primary age or three miles at secondary age, or where there is no available walking route to school. Therefore, there would be additional implications in terms of transport costs, logistics and highway constraints around school sites.

Any proposed development where the catchment and nearest schools are in excess of the walking distances noted above, or where there is no available walking route to access schools, may increase the cost to the public purse for school transport. Consideration must be given to the ongoing costs both to the developer and the public purse of transport costs for pupils living on such developments, and the sustainability and environmental impacts of the site(s). S106 contributions may be required to offset any additional transport costs related to new development. However, SSDC should consider whether growth in such areas is sustainable as ultimately the public purse will pick up the cost of school transport when any developer subsidy ends.

In relation to the preferred areas of growth and the housing allocations for other areas we comment as follows:

#### Proposed Housing Growth – Locality 1

##### Penkrige Town

Provision for 1,217 dwellings, 88 dwellings through allocation of existing safeguarded land and a further 1,129 dwellings as part of the preferred new housing sites in Penkrige.

Penkrige operates a three-tier education system and contains three first schools, one middle school and one high school; the high school serves Penkrige Centre and the wider rural area.

There are 563 dwellings in Penkrige that have been/are being built out or have planning approval. This has resulted in a 0.5FE (75 places) expansion at Princefield First School which is in the process of being completed and a 0.5FE (60 places) expansion at Penkrige Middle which was completed in September 2020.

To mitigate the proposed new housing further educational infrastructure would be required. The new site has a new 1FE (150 places plus nursery provision) First School allocated. This land would need to be at least 7,635m<sup>2</sup>; the costs and details on the requirements for the land are detailed above.

Penkridge Middle School and Wolgarston High School would both require up to 1FE of additional school infrastructure to mitigate the impact of the proposed developments (an additional 120 and 90 places respectively).

#### Southern Edge of Stafford – (A34 corridor)

Provision for 168 dwellings as part of the preferred new housing sites around the southern edge of Stafford along the A34.

For school place planning purposes this site, due to its geographical location fall into Stafford South Primary Cluster and Stafford High School Cluster. Stafford operates a two-tier education system.

The catchment schools are All Saints CE (VA) Primary School (located within the South Staffordshire District boundary) and Walton High School.

Whilst it is expected that the proposed development may be able to be accommodated within the existing school infrastructure at both primary and secondary schools within the local area, further work will need to be undertaken to understand the impact of the combined infrastructure requirements of SSDC's Local Plan and Stafford Borough Council's Local Plan Review

Developer contributions may be required to mitigate the impact of the development.

#### Huntington

Provision for 83 dwellings, 39 dwellings through allocation of existing safeguarded land and a further 44 dwellings as part of the preferred new housing sites in Huntington.

For school place planning purposes these sites, due to their geographical location fall into Cannock 1 Primary Cluster and Cannock High School Cluster. Cannock operates a two-tier education system. The catchment schools are Littleton Green Primary School (located within South Staffordshire District boundary) and Cannock Chase High School.

It is expected that the proposed developments can be accommodated within the existing primary and secondary school infrastructure in Cannock.

#### Proposed Housing Growth – Locality 2

##### Land at Cross Green

Provision for 1,200 dwellings as part of the preferred new housing sites located in Cross Green.

The site at Cross Green has land allocated to provide a new 1FE (210 places plus nursery provision) school at primary phase. This land should be at least 11,415m<sup>2</sup> to facilitate this. However, there may be a requirement for additional infrastructure at primary phase due to the total number of proposed dwellings being built (1,200),

which is higher than the 1,000 dwellings which could be accommodated within a new 1FE school. A site should be safeguarded to facilitate delivery of up to a 1.5FE new school (15,923m<sup>2</sup>) to ensure that the impact of the development can be fully mitigated.

The costs and details for the requirements of the land are detailed above.

Further discussions will need to be held with SCC, SSDC and proposed developers to outline the masterplan for the site so it can inform how the school would be built/opened.

It is expected that this development could be accommodated within existing infrastructure at middle/secondary phase, but further work needs to be completed and additional education infrastructure may still be required.

Transport to secondary education would be required from this site.

### Brewood

Provision for 106 dwellings, 63 dwellings through allocation of existing safeguarded land and a further 43 dwellings as part of the preferred new housing sites in Brewood. Brewood operates a three-tier education system and contains one first school, one catholic primary and a middle school which serves the wider rural area. Brewood falls into the catchment area of Wolgarston High.

It is expected that the proposed developments can be accommodated within the existing first and middle school infrastructure, but additional infrastructure may be required at Wolgarston High School to mitigate the cumulative impact of the Local Plan dwellings proposed within the school's catchment.

Transport to high school education would be required from these sites.

### Coven

Provision for 48 dwellings through allocation of existing safeguarded land in Coven. Coven operates a three-tier education system and contains one first school. For Middle and High provision Coven falls into the catchment areas of Brewood Middle and Wolgarston High.

It is expected that the proposed developments can be accommodated within the existing first and middle school infrastructure, but additional infrastructure may be required at Wolgarston High School to mitigate the cumulative impact of the Local Plan dwellings proposed within the school's catchment.

Transport to middle/high school education would be required from this site.

### Wheaton Aston

Provision for 54 dwellings, 17 dwellings through re-allocated SAD housing allocations and a further 37 dwellings as part of the preferred new housing sites in Wheaton Aston. Wheaton Aston operates a three-tier education system and

contains one first school. For Middle and High provision Wheaton Aston falls into the catchment areas of Brewood Middle and Wolgarston High.

It is expected that the proposed developments can be accommodated within the existing first and middle school infrastructure, but additional infrastructure may be required at Wolgarston High School to mitigate the cumulative impact of the Local Plan dwellings proposed within the school's catchment

Transport to middle/high school education would be required from this site.

### Proposed Housing Growth – Locality 3

#### Cheslyn Hay/Great Wyrley

Provision for 484 dwellings, 153 dwellings through re-allocated SAD housing allocations, 218 dwellings through allocation of existing safeguarded land and a further 113 dwellings as part of the preferred new housing sites in Cheslyn Hay/Great Wyrley.

Cheslyn Hay/Great Wyrley operates a two-tier education system and contains eight primary schools and two secondary schools.

It is expected that the proposed developments can be accommodated within the existing primary and secondary school infrastructure within the Cheslyn Hay/Great Wyrley high school place planning area.

#### Northern Edge of the Black Country (Linthouse Lane)

Provision for 1,976 dwellings as part of the preferred new housing sites located in Cross Green of which 1,200 houses would be delivered within this plan period at land north of Linthouse Lane.

The site at Linthouse Lane has land allocated to provide a new 2FE (420 places plus nursery provision) school at primary phase. This land should be at least 20,430m<sup>2</sup> to facilitate this. The costs and details for the requirements of the land are detailed above.

Further discussions will need to be held with SCC, SSDC and proposed developers to outline the masterplan for the site so it can inform how the school would be built/opened e.g. phased opening up to 2FE.

It is expected that the proposed development can be accommodated within the existing secondary school infrastructure within the Cheslyn Hay/Great Wyrley high school cluster.

Transport to secondary education would be required from this site.

#### Featherstone and Shareshill

Provision for 49 dwellings through allocation of existing safeguarded land in Featherstone. Featherstone operates a two-tier education system and includes two

primary schools and the area falls into the Cheslyn Hay/Great Wyrley High school place planning area.

The proposed development may require additional educational infrastructure at primary phase, but it is expected it can be accommodated with the existing infrastructure at secondary phase.

Transport to secondary education would be required from this site.

#### Proposed Housing Growth – Locality 4

##### Codsall/Bilbrook 1279 dwellings

Provision for 1279 dwellings, 29 dwellings through re-allocated SAD housing allocations, 317 dwellings through allocation of existing safeguarded land and a further 933 dwellings as part of the preferred new housing sites in Codsall/Bilbrook. Codsall/Bilbrook operates a three-tier education system and contains three first schools, one catholic primary, two middle schools and one high school.

There are 421 dwellings in Codsall/Bilbrook that have been/are being built out or have planning approval.

The new site has a new 2FE (300 places plus nursery provision) First School allocated. This land would need to be at least 12,870m<sup>2</sup>, the costs and details on the requirements for the land are detailed above.

Further discussions will need to be held with SCC, SSDC and proposed developers to outline the masterplan for the site so it can inform how the school would be built/opened.

It is expected that the proposed developments can be accommodated within the existing middle school infrastructure within Codsall/Bilbrook but Codsall High School would require additional school infrastructure to mitigate the cumulative impact of the proposed developments within the school's catchment in Codsall/Bilbrook, Perton and Pattingham.

##### Perton

Provision for 150 dwellings through allocation of existing safeguarded land in Perton. Perton operates a three-tier education system and contains two first schools, one middle school and falls into the catchment area of Codsall High School.

It is expected that the proposed developments can be accommodated within the existing first and middle school infrastructure, but additional infrastructure may be required at Codsall High School to mitigate the cumulative impact of the proposed developments within the school's catchment in Codsall/Bilbrook, Perton and Pattingham.

Transport to high school education would be required from this site.

##### Pattingham – 40 dwellings

Provision for 40 dwellings, 18 dwellings through allocation of existing safeguarded land and a further 22 dwellings as part of the preferred new housing sites in Pattingham. Pattingham operates a three-tier education system contains one first schools, and pupils in Pattingham access Codsall Middle Schools and Codsall High School.

It is expected that the proposed developments can be accommodated within the existing first and middle school infrastructure, but additional infrastructure may be required at Codsall High School to mitigate the cumulative impact of the proposed developments within the school's catchment in Codsall/Bilbrook, Perton and Pattingham.

Transport to middle/high school education would be required from these sites.

### Proposed Housing Growth – Locality 5

#### Wombourne

Provision for 514 dwellings, 275 dwellings through allocation of existing safeguarded land and a further 239 dwellings as part of the preferred new housing sites in Wombourne. Wombourne operates a two-tier education system and contains four primary schools and one secondary school.

The primary schools and secondary school in the area are reaching capacity and additional infrastructure may be required dependent on the timing of future development in this area. SOT would welcome further discussions with SSDC to discuss future housing trajectory expected in this area.

#### Western Edge of the Black Country (Langley Road)

Provision for 390 dwellings as part of the preferred new housing site around the southern edge of Stafford along the A34.

The catchment schools are Bhylls Acre Primary School (located within the City of Wolverhampton boundary) and Wombourne High School.

It is expected that the proposed development can be accommodated within the existing primary school based on expected build out rates of the proposed development. Additional infrastructure may be required at secondary school dependent on the timing of future developments in the school catchment. SOT would welcome further discussions with SSDC to discuss future housing trajectory expected in this area.

Transport to secondary school education may be required from this site.

#### Kinver

Provision for 162 dwellings, 36 dwellings through re-allocated SAD housing allocations, 82 dwellings through allocation of existing safeguarded land and a further 44 dwellings as part of the preferred new housing sites in Kinver. Kinver

operates a two-tier education system contains one infant, one junior school and one secondary school.

It is expected that the proposed development can be accommodated within the existing primary and secondary school infrastructure.

### Swindon

Provision for 22 dwellings, 11 dwellings through allocation of existing safeguarded land and a further 11 dwellings as part of the preferred new housing sites in Swindon. Swindon operates a two-tier education system and has one primary school and pupils in Swindon can access secondary education at Wombourne/Kinver High School cluster.

It is expected that the proposed development can be accommodated within the existing primary and secondary school infrastructure.

Transport to secondary school education may be required from this site.

### Proposed Housing Growth - other settlements/tier 5 settlements/windfall sites

There are a further 288 sites in rural and tier 5 settlements and 450 windfall sites: a total of 738 dwellings. Dependent on location a total of 111 first school places, 155 primary school places, 89 middle school places, 111 secondary school places, 66 high school places and 22 post 16 places are required.

As the location and numbers are not known at this time, we would assess the required mitigation (if any) on a site-by-site basis in conjunction with any cumulative impact with other proposed Local Plan sites in the same school place planning area.

### Aspirations for a new settlement A449/Westcoast mainline (Wolverhampton - Stafford)

Further discussions will need to be held with SSDC and proposed developers to outline the masterplan for the site so it can inform how the schools would be built/opened.

It should be noted that it is unlikely existing secondary education infrastructure can accommodate a large settlement. Careful consideration will therefore need to be given to the impact on secondary education infrastructure, including how any potential new school could be funded, delivered and sustained.

### **Public Health and Care**

The following response has been developed to highlight the Public Health and Wellbeing implications of the local South Staffordshire Preferred Option plan. In addition, we have prepared a 'South Staffs Health Needs Outcomes' document, which is enclosed with this letter. This document should assist in ensuring key health issues are captured and evidenced in the Local Plan.

Theme	Planning issue	Health and wellbeing issue	South Staffordshire Plan Response
<b>Healthy housing</b>	<ul style="list-style-type: none"> <li>• Housing design</li> <li>• Accessible housing</li> <li>• Healthy living</li> <li>• Housing mix and affordability</li> </ul>	<ul style="list-style-type: none"> <li>• Lack of living space - overcrowding</li> <li>• Unhealthy living environment – daylight, ventilation, noise</li> <li>• Excess deaths due to cold / overheating</li> <li>• Injuries in the home</li> <li>• Mental illness from social isolation and fear of crime</li> </ul>	<p>The provision of affordable housing can create mixed and socially inclusive communities. The provision of affordable family sized homes can have a positive impact on the physical and mental health of those living in overcrowded, unsuitable or temporary accommodation. Both affordable and private housing should be designed to this high standard.</p> <p><b>Response:</b> <i>The proposal highlights a clear requirement and tenure split for affordable housing.</i></p>
<b>2. Active travel</b>	<ul style="list-style-type: none"> <li>• Promoting walking and cycling</li> <li>• Safety</li> <li>• Connectivity</li> <li>• Minimising car use</li> </ul>	<ul style="list-style-type: none"> <li>• Physical inactivity, cardiovascular disease and obesity</li> <li>• Road and traffic injuries</li> <li>• Mental illness from social isolation</li> <li>• Noise and air pollution from traffic</li> </ul>	<p>A travel plan can address the environmental and health impacts of development by promoting sustainable transport, including walking and cycling.</p> <p><b>Response:</b> <i>Although the document does not clearly identify an Active Travel Plan, there is identified opportunities for active travel, such as cycling and walking, being planned effectively to support healthy and active lifestyles amongst all sections of the community.</i></p> <p>Traffic management and calming measures and safe crossings can reduce road accidents involving cyclists and pedestrians and increase levels of walking and cycling.</p> <p>Developments should prioritise the access needs of cyclists and pedestrians. Routes should be safe, direct and convenient and barriers</p>



			<p>and gated communities should be avoided. Developments should be accessible by public transport. Space for pedestrians and cyclists should be given priority over commercial and private vehicles. Maximum car parking levels allows for provision to be reduced as far as practicable. Car clubs can be effective in reducing car use and parking demand at new residential developments.</p> <p><b>Response:</b> <i>Opportunities for active travel, such as cycling and walking, are being planned effectively to support healthy and active lifestyles amongst all sections of the community.</i></p>
<p><b>3. Healthy environment</b></p>	<ul style="list-style-type: none"> <li>• Construction</li> <li>• Air quality</li> <li>• Noise</li> <li>• Contaminated land</li> <li>• Open space</li> <li>• Play space</li> <li>• Biodiversity</li> <li>• Local food growing</li> <li>• Flood risk</li> <li>• Overheating</li> </ul>	<ul style="list-style-type: none"> <li>• Disturbance and stress caused by construction activity</li> <li>• Poor air quality - lung and heart disease</li> <li>• Disturbance from noisy activities and uses of equipment</li> <li>• Health risks from toxicity of contaminated land</li> <li>• Physical inactivity, cardiovascular disease and obesity</li> <li>• Mental health benefits from access to nature and green space and water</li> <li>• Opportunities for food growing – active</li> </ul>	<p>Construction activity can cause disturbance and stress, which can have an adverse effect on physical and mental health. Mechanisms should be put in place to control hours of construction, vehicle movements and pollution. Community engagement before and during construction can help alleviate fears and concerns.</p> <p>The long-term impact of poor air quality has also been linked to life-shortening lung and heart conditions, cancer and diabetes which currently has a rate of 81.1% slightly below the UK rate (86.3%) but above the regional rate (78.0%)</p> <p>Reducing noise pollution helps improve the quality of urban life.</p>

		<p>lifestyles, healthy diet and tackling food poverty</p> <ul style="list-style-type: none"> <li>• Excess summer deaths due to overheating</li> </ul>	<p>Access to open space has a positive impact on health and wellbeing. Living close to areas of green space, parks, woodland and other open space can improve physical and mental health regardless of social background.</p> <p>Access to nature and biodiversity contributes to mental health and wellbeing. New development can improve existing, or create new, habitats or use design solutions (green roofs, living walls) to enhance biodiversity.</p> <p><b>Response:</b> <i>The plan proposes to create/enhance multifunctional green spaces and the enhancement of the Green Infrastructure Network, however there is no detail that illustrates how this proposal will address physical inactivity, reduce obesity and use the spaces effectively to reduce Mental Health. There is also no detail in the proposal relating to providing space for local food growing/allotment space, which also helps promote more active lifestyles, better diets and social benefits.</i></p> <p>Regular participation in physical activity among children and young people is vital for healthy growth and development. The location of play spaces should be accessible by walking and cycling routes that are suitable for children to use.</p> <p>South Staffordshire has a higher-than-average prevalence for excess weight in Reception aged school children.</p>
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			<p><b>Response:</b> <i>The Local Plan proposes to provide opportunities to promote a healthy weight environment supporting a Whole System Approach (WSA) to obesity in South Staffordshire and in addition are working as part of a WSA, when planning forms part of a wider approach to addressing obesity.</i></p> <p>Flooding can result in risks to physical and mental health. The stress of being flooded and cleaning up can have a significant impact on mental health and wellbeing. It is likely that increasing development densities and building coverage coupled with more frequent extreme weather events will increase urban flood risk.</p> <p>Parts of Southern Staffordshire are at risk from the following sources: fluvial, surface water, groundwater, sewers, reservoir inundation and canal overtopping/breaches. This study has shown that the most significant sources of flood risk in Southern Staffordshire are fluvial and surface water, (<a href="#">Southern Staffordshire ,Councils Level 1 Strategic Flood Risk Assessment Final Report October 2019</a>)</p> <p><b>Response:</b> <i>The proposal supports radical reductions in greenhouse gas emissions through the community's design, whilst also allowing for changing</i></p>
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			<p><i>demographics, future growth, and the impacts of climate change including flooding risk. However, it is not clear what the proposed plan is to reduce the risk of fluvial and surface water.</i></p> <p>Climate change with higher average summer temperatures is likely to intensify the urban heat island effect and result in discomfort and excess summer deaths amongst vulnerable people. Urban greening - tree planting, green roofs and walls and soft landscaping can help prevent summer overheating.</p> <p><b>Response:</b> <i>Although the document does not clearly identify how air quality and climate change will be addressed there does appear to be some planning for the impact of climate change.</i></p>
<p><b>4.Vibrant neighbourhood</b></p>	<ul style="list-style-type: none"> <li>• Healthcare services</li> <li>• Education</li> <li>• Access to social infrastructure</li> <li>• Local employment and healthy workplaces</li> <li>• Access to local food shops</li> <li>• Public buildings and spaces</li> </ul>	<ul style="list-style-type: none"> <li>• Access to services and health inequalities</li> <li>• Mental illness and poor self-esteem associated with unemployment and poverty</li> <li>• Limited access to healthy food linked to obesity and related diseases</li> <li>• Poor environment leading to physical inactivity</li> <li>• Ill health exacerbated through isolation, lack of social contact and fear of crime</li> </ul>	<p>Poor access and quality of healthcare services exacerbates ill health, making effective treatment more difficult. The provision of support services and advice on healthy living can prevent ill health.</p> <p>Access to a range of primary, secondary, and post-19 education improves self-esteem, job opportunities and earning capacity. In South Staffordshire, based on school location, for KS4 English &amp; Maths Grades 9-5 (2019), South Staffordshire did not perform significantly above national and is</p>

		<p>statistically lower than the national average (37%).</p> <p>Good access to local services is a key element of a lifetime neighbourhood and additional services will be required to support new development. Not doing so will place pressure on existing services.</p> <p><b>Response:</b> <i>Since lower educational attainment is linked to areas facing multiple socio-economic inequalities and includes South Staffordshire. It is good to see that the Local Plan Preferred Options document acknowledges some of the key health inequalities such as access to a good range of health services. However, at point "3.2 The strategic policies for an area should include policies and site allocations to address key issues" does not identify 'Health and Wellbeing/Preventative Health measures' as key issues to considered or addressed, as we know that the environment, we live in has a huge impact on our health. Further the evidence base detailed in "Promoting successful and sustainable communities" does not consider this either, particularly as 20.8% of 16+ have a limiting long-term illness (which is above England rate) and 49.4% of 65+ also have limiting long-term illness (above the England rate) that are primarily preventable and could be improved by addressing some of the most significant wider determinants</i></p>
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		<p><i>of health – those of the built and natural environment. The following evidence could have been considered –</i></p> <ul style="list-style-type: none"> <li>• <i>Marmot has recently reported on inequalities, and the environment was cited as a key determinant of health and wellbeing. (8) Marmot M. et al. Health equity in England: The Marmot Review 10 years on. London: Institute of Health Equity, 2020.) The report stated that the evidence of the relationships between health and the environment has grown and that the role the environment plays in influencing health is now better understood. Important areas that were covered included: air quality, transport, and housing.</i></li> <li>• <a href="#"><u>Spatial planning for health: evidence review</u></a></li> </ul> <p>Unemployment generally leads to poverty, illness and a reduction in personal and social esteem. Employment can aid recovery from physical and mental illnesses. Creating healthier workplaces can reduce ill health and employee sickness absence.</p> <p><b>Response:</b> No evidence seen of how this will be addressed, these issues evident in the proposed plan.</p> <p>Data from <a href="#"><u>NOMIS official Labour Market Profile</u></a> shows that although the unemployment rate in South Staffordshire of 4.6% is below the West Midlands rate</p>
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		<p>of 5.4% and UK rate of 5.0%. There should be some consideration given to the impact of unemployment as in some neighbourhoods a link can be drawn between the overlap of the spatial patterns of unemployment with the spatial distribution of social housing and socioeconomic problems (<a href="#">The Patterns of Unemployment and the Geography of Social Housing</a>)</p> <p>The public realm has an important role to play in promoting walking and cycling, activity and social interaction. It also affects people's sense of place, security and belonging. It is a key component of a lifetime neighbourhood. Shelter, landscaping, street lighting and seating can make spaces attractive and inviting. Implementing inclusive design principles effectively creates an accessible environment, in particular for disabled and older people.</p> <p><b>Response:</b> <i>The Local Plan Preferred Options document acknowledges inequalities in attainment levels within the district. However, other key health inequalities such as race inequality in housing and disadvantaged communities, are more likely to have less access to good quality open space, easy walking and cycling routes, well located services and good housing mix and design. They are also more likely to experience environmental burdens such as pollution, crime and social isolation which are not clearly addressed.</i></p>
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Staffordshire County Council's Children and Families, Health and Wellbeing Team work closely with partners to drive forward improvements in health outcomes for children, young people and families across Staffordshire.

The County Council's Children and Families Health and Wellbeing Team have three priorities that focus our work: obesity, infant mortality, and mental health.

These priorities are shared within the [Staffordshire Health and Wellbeing Board's Staffordshire Health & Wellbeing Strategy 2018-2023](#).

These priorities are also included in the [Staffordshire Families Strategic Partnership – Staffordshire's Children, Young People and Families Strategy 2018-2028](#). Under the high-level priority 'Happy and Healthy' – *'improve children and families' mental health and emotional wellbeing'* and *'encourage communities to be more active and live healthier lifestyles'* and included. Under the high-level priority 'Safe and Belong' – *'Reduce infant and child mortality rates'* is included.

Appendix 1 contains an evidence base around the key priorities of the County Council's Children & Families, Health & Wellbeing Team (obesity, infant mortality, and mental health).

The County Council and partners have recently commenced work to establish and implement a whole systems approach (WSA) to address obesity and promote a healthy weight, called 'Better Health Staffordshire'. Obesity is a complex problem with multiple causes and significant implications for health and beyond. Tackling such an ingrained problem requires a long-term, system-wide approach that makes obesity everybody's business, tailored to local needs and works across the life course.

The use of the planning system to promote health and reduce inequalities is well established<sup>1</sup>. The Local Plan provides opportunities to promote a healthy weight environment supporting the WSA to obesity in South Staffordshire and Staffordshire. The Local Plan provides opportunity to demonstrate how South Staffordshire District Council, along with the County Council, are working as part of a whole system approach, where planning forms part of a wider approach to addressing obesity.

The Local Plan 'Preferred Options' document includes eight Strategic Objectives, all of which have some relevance to the health and wellbeing of the community.

### Policies

In relation to the policies within the Plan the County Council welcomes the inclusion of Policy HC13 – Health and Wellbeing. This policy should provide the mechanism to address and promote health and wellbeing needs and support healthy communities. It is noted that the precise wording of the Policy is not included in the Preferred Options Plan just a direction of travel. We would be happy to assist in reviewing any draft

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<sup>1</sup> [Using the planning system to promote healthy weight environments \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)



wording ahead of the Publication Plan to ensure Health and Well-Being aspects are well considered.

The requirement for Design and Access Statements for large development (over 150+ dwellings) to demonstrate how specific measures have been designed to have a positive impact on the health and wellbeing of residents is welcome and supported.

The inclusion of a policy hook for a health and wellbeing Supplementary Planning Document (SPD) to provide further detailed guidance on how health and wellbeing benefits will be delivered through specific design interventions is also welcome and to be encouraged. We would be willing to support you in the production of the SPD.

The County Council appreciates the inclusion of Policy DS4 – Longer Term Growth Aspirations for a New Settlement. This sets the parameters for what a new settlement to be delivered would need to incorporate. The inclusion of 'green infrastructure and health' within this framework, where the settlement should be designed to provide choices and changes for all to live a healthy life, offers further opportunity to improve the health and wellbeing needs and opportunities for healthy lifestyles for residents.

### **Adult Social Care**

It is acknowledged that the Plan identifies at Page 18 that meeting the housing needs of the ageing population is an issue to consider. It is also recognised in the same section that it is identified that the Local Plan will need to support the provision of specialist housing requirements of other groups, such as those with disabilities.

Policy HC4 - Homes for Older People sets out the requirements for new development to meet the needs of an ageing population and is supported. It is noted that the examples of general needs properties refer to single floor accommodation. There may be other options that facilitate two-storey accommodation such as through ceiling lifts, well designed stairs with stair lifts. The Plan should also make reference to housing for Older People also needing to be aspirational to encourage older persons to move from existing stock to new housing. Consideration of design and quality also needs to be a factor as well as numbers of units.

Policy HC5 - Specialist Housing Schemes provides support for proposals for specialist housing of all tenures. However, the examples listed in the plan lean towards specialist accommodation for older person e.g. extracare. Whilst this is needed and supported Policy HC5 doesn't appear to address providing for the wider population needs for people with disabilities across all age groups as identified on page 18. In preparing the detailed wording for Policy HC5 it is suggested that consideration is given to the following key Government documents published in late July 2021, which have a bearing on local planning across the full spectrum of disabilities:

- [National Disability Strategy - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/national-disability-strategy) – addressing key barriers faced by disabled people including transport, housing and access to buildings and places.
- [National strategy for autistic children, young people and adults: 2021 to 2026 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/national-strategy-for-autistic-children-young-people-and-adults-2021-to-2026) – Stipulating commitments with regard to supported housing built by the new affordable homes programme

- [Supported housing: national statement of expectations - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/supported-housing-national-statement-of-expectations) - Please also be aware of the following recent publication in relation to Supported Housing provision which covers supported housing provision for all needs:

The National Disability Strategy potentially provides advice and guidance that could be applied wider than Policy HC5 in terms of master planning, site layouts and design.

We may be able to assist later in the Plan period with local data but for now, a good source of data: [Projecting Adult Needs and Service Information System \(pansi.org.uk\)](https://pansi.org.uk/). There is also a link to Poppi data from this which covers the needs of older people and produces forward projections. This will cover a range of disabilities and needs and it generates data by district.

## Ecology

In relation to Q1 the evidence base for the natural environment is appropriate.

Several allocations adjoin designated Biodiversity Alert Sites (BAS) and these will need to ensure the BAS's are buffered / protected and ideally enhanced.

The allocations sites are:

- Adjacent to Merry Hill, Wolverhampton
- Large site to east of Codsall / Bilbrook
- Small site to west of Codsall Station
- Site to west of Brewood

In addition the following site will need to consider onsite habitats:

- Adjacent to Merry Hill, Wolverhampton (onsite ponds and scrub / woodland)

## Landscape

Question 4: Do you support the policy approach in Policy DS1 – Green Belt and Policy DS2 – Open Countryside?

Generally, the policy approach should protect and enhance the Green Belt and Open Countryside. In addition, the policy could consider compensation or carbon offsetting of new development by well-designed tree and woodland planting in the green belt and open countryside where it fits the local landscape character guidelines.

Some areas along the urban conurbation edges could make a significant contribution to the identity of the adjacent settlement edge. New, well planned landscape features could provide valuable boundary features separating urban areas from the surrounding countryside, such as strong woodland belts. The Spatial Strategy could include an innovative Green Infrastructure policy which could be considered hand in hand with site selection options on a strategic level. Such a policy could take an overarching view on climate change, habitat loss and replacement over the whole District. The precedents for this multifunctional approach include the Forest of Mercia and National Forest. Large scale woodland creation could also be seen in the context of the wealth of historic designed parklands throughout South Staffordshire.

Question 5: Do you support the policy approach in Policy DS3 – The Spatial Strategy to 2038?

The 5-tier classification for settlements is appropriate and it appears to achieve the necessary growth in housing and employment needs for the District.

Although it is mentioned in the report, the impact of the planned M6-M54 link road on the District infrastructure and settlements does not seem to have been considered. Additional landscape enhancement of the existing District highway infrastructure could offset the impact of the additional road travel as a result of expanding the Tier 1 and 2 settlements in particular.

The District is unusual in that whilst 80% of the area is in Green Belt and 14% is open countryside; there are significant historic major rural highways such as the A5, A34, A41, A449, A454, A458 and modern motorways including the M6, M54, and the M6Toll. All these roads will experience increased traffic throughout the plan period, and a strategic plan to enhance the setting of the roads by means of tree and woodland planting would help to integrate new development into the changing landscape. Where practical, the new landscape features should be multifunctional and should incorporate measures for active travel such as segregated cycleways, longer distance walking routes, new recreational opportunities, and linked ecological corridors.

The proposed radical changes to farming policies and the effects of the Environment Bill could also be considered in the Preferred Options. The farmed landscape is likely to undergo significant changes during the plan period, and the plan should embrace the change which should benefit both residents and the farming population, as well as the wider environment.

Question 6: Do you support the policy approach in and Policy DS4 – Longer Term Growth Aspirations for a New Settlement?

The Criteria for the siting and design of a new settlement adjacent to the A449 and West Coast Main line are aspirational at this stage it will be necessary to ensure that the settlement fits into the local landscape character in the way that most other settlements in the district have evolved over hundreds of years.

## **Historic Environment**

In general the approach taken with regards to archaeology and the historic environment is supported.

Q1 Do you agree that the evidence base set out in Appendix A is appropriate to inform the new Local Plan? Yes - the evidence based with regards to archaeology and the historic environment, which comprises the existing South Staffordshire Historic Environment Assessment and a Stage 1 Historic Environment Site Assessment (HESA) is considered to be a robust and sufficient evidence base at this stage. The methodology of the HESA, which has been underpinned by a search of the Staffordshire Historic Environment Record (HER), has been developed in consultation with Historic England and the Staffordshire County Council Historic Environment Team, and is sufficiently detailed, and the HESA appears to be mostly (see Q8 below) accurate and well-considered.

Q3 a) Have the correct vision and strategic objectives been identified? Yes- Strategic Objective 13, which relates to 'Enhancing the Historic Environment' is supported and it is welcomed that specific mention is made of the district's canal network

3b) - Do you agree that the draft policies (Chapters 4 and 5) and the policy directions (Chapter 6) will deliver these objectives? AND Q11 Do you agree with the proposed policy approaches set out in Chapter 6?

Yes - The policy directions outlined in Chapter 6 (in particular NB9 and NB10) appear to be sufficiently comprehensive to sustainably deliver these objectives.

Q8 Do you support the proposed housing allocations in Policy SA5? The HESA (and subsequent updates) has done a very useful job in assessing the potential historic environment/archaeological issues for each application. However, it must be noted here that subsequent to the production of the HESA, the Staffordshire Historic Environment Record (HER) has been made aware of a potential Second World War gun battery within part of Site 582 'West of Wolverhampton'. The evidence that has been provided is compelling and it is strongly recommended that the Stage 2 HESA for this site is enhanced to also include an assessment of the significance of this site, preferably with the input of a relevant specialist in this field, and in line with the guidance provided in Historic England's Military Structures Listing Selection Guide (Historic England 2017).

### **Public Rights of Way**

The plan acknowledges that there are *Challenges around increasing cycle and footpath provision for leisure or commuting, including connecting to established routes* (p. 21). Ultimately sustainable travel should be a key element of the plan when looking at sites and should form a primary consideration of decision making when looking at sites and how access to and from them can be improved. There needs to be an aspiration to improve accessibility on the walking and cycling networks (including towpath links) throughout the District.

It is essential that the plan should strive to increase the levels of physical activity and the public rights of way network should be integral to any schemes that are developed to promote this.

The Plan Policies should recognise that any development needs to take appropriate mitigation to ensure the public path network is protected. In addition it should be recognised that there are likely to be many non-definitive routes across proposed development sites which should be considered by any applicants. In many cases these routes could have become rights of way by virtue of established usage over many years and should be treated as public. There will also be sites where such usage or historic evidence has already resulted in applications being made to the County Council under Section 53 of the Wildlife and Countryside Act 1981 to add or modify the Definitive Map of Public Rights of Way, which affects the land in question.

Where development is likely to affect the path network, either directly or indirectly, then section 106 funding and/or appropriate planning conditions improve the path network should be considered and provided for by Plan Policy. Where such instances occur developers should be encouraged to enhance the existing path network where possible in line with Staffordshire County Council's Rights of Way Improvement Plan.

This could include:

- the creation of public bridleways or the upgrading of public footpaths to bridleways to improve provision for horse riders and cyclists across Staffordshire where there is currently a shortfall in available access routes.
- the creation and promotion of short circular walks to promote the health benefits of walking
- the replacement of stiles with gaps (where there are no stock) or gates (where there are) in line with Staffordshire County Council's Least Restrictive Principle for path furniture

### **Flooding and Drainage**

We have provided technical commentary on the sites being considered for allocation during the selection process so will not repeat those comments here.

Policy NB7 - Managing flood risk, sustainable drainage systems & water quality is supported and recognises the previous engagement with SCC in its role as Lead Local Flood Authority. We acknowledge reference in the Plan to the SCC SUDS Handbook in relation to drainage design. We'd like to ensure that this follows through into the final Policy wording to ensure that the SUDS Handbook is a material consideration in Planning decision making to ensure SUDS design, delivery and maintenance is properly addressed in new development.

In addition it would be useful if the supporting text could advise developer that SCC offer a Pre-App advice service and we encourage this practice to be used and has proven extremely useful in recent developments.

### **Digital Connectivity**

It is noted that improving access to suitable broadband and digital communication networks is listed as an Issue/challenge for the Plan. However, thereafter there is no mention of broadband or digital network in the Plan Policies.

Staffordshire County Council, and all the district councils have collaborated for the last eight years in ensuring Staffordshire reaches a high level of superfast broadband coverage. This has enabled 97% of premises to date, to be able to access this increasingly vital service.

Over that period we have seen Local Plans and Neighbourhood Plans with various different policy approaches to ensure new development delivered Superfast Broadband connectivity from the outset. However, during that time we have seen examples of development being built out without digital infrastructure being provided as part of construction and frustrated occupiers not being able to connect to a service. Where such instances occur, the problem is exacerbated by section 58 of the New Roads and Street Works Act 1991. This protects a street from any new excavations following any major surfacing works and can be in place for up to five. So, for newly adopted roads the restriction is in place from the outset meaning broadband providers cannot come in and lay cabling unless they are prepared to undertake full-width reinstatement of the footway, which is cost prohibitive. Hence the importance of installing digital connectivity infrastructure during build out.

Technology does not stand still. As internet applications expand in scale and volume, internet traffic is doubling every two years, meaning that the current limitations of digital connectivity will cease to be fit for purpose within the next ten years i.e. we need to move on from Superfast Broadband. Government is now talking about 'Gigabit Broadband' through the Industrial Strategy. This is delivered by gigabit-capable connections that can provide speeds of over 1000 megabits per second (Mbps). Gigabit-capable connections are often, but not always, delivered by full fibre connections and can also be delivered via technologies such as cable (DOCSIS 3.1) and fixed wireless access. Government approach is technology neutral and does not prescribe the type of technology that must be used, provided that it can provide speeds of over 1000 Mbps. However, for most instances full fibre will be the preferred means of delivery.

Government is clear that the provision of gigabit-capable connectivity to new build developments is crucial. A consultation in 2018 proposed to change building regulations to legislate for all new builds to have gigabit connectivity. However, subsequently the Government has secured commitments from network operators, outlining their commitment to work with housing developers on providing gigabit-capable connections to all new build developments across the UK. Although the exact mix of commercial delivery and publicly subsidised coverage is yet to be defined, results from an Open Market Review (OMR) from DCMS are expected by end of 2021, a common requirement will be facilitating (red carpet approach) wherever possible and practical, the means of operational delivery.

Given the uncertainty over where and when Government may head with Legislative changes what we'd like to work with you and agree suitable Policy drafting to ensure development is catered for by gigabit-capable connectivity. We can also provide signposting to Government and supplier guidance that could feature in the supporting text.

## **Climate Change**

As noted earlier it is acknowledged that climate change is a key theme running through the Plan and is incorporated into a number of policies.

In relation to Policy NB5 - Renewable and low carbon energy generation. It is noted support is given for renewable energy schemes, such as wind and solar. Bullet point 3 provides for general support for on-shore wind and proposes removal of the areas of search set out in the core strategy. Given National Policy for on-shore wind implying sites need to be allocated in a Local Plan to be considered, is it the intention of Policy NB5 that whole of the District is to be considered potentially suitable for wind farm development subject to a criteria based assessment?

It is recognised that Policy NB5 confirms that renewable energy schemes in the green belt may be justified, where very special circumstances can be demonstrated. Given the extent of the Green Belt in the District and the limited location of connection points to the electricity grid will the Plan provide further guidance and/or clarity on what may constitute very special circumstances for Renewable Energy Development?

Yours sincerely

**James Chadwick**  
**Principal Planning Policy Officer**

**Enclosures:**

- Walking & Cycling Proposals (x 11)
- Accessibility Plans (x 7)
- APPENDIX 1 - Evidence Base: Children and Families Health and Wellbeing, Staffordshire County Council
- South Staffs Health Needs Outcomes Nov21