



## **Local Plan Review**

# **Schedule of Main Modifications to the South Staffordshire Local Plan (2023 – 2041)**

**April 2026**

Modification Number	Action Number / Previous Mod No	Page / Paragraph	Policy / Section	Proposed Change	Soundness Reason for Modification
MM089	Action 13	Throughout	All policies	<del>“Development proposals should be consistent with other Local Plan policies.”</del>	The amendment ensures the policies are justified.
MM090	Action 3.1	Pg 21, Table 6	Strategic Objective	Amend - <del>To meet the housing and employment needs of the district whilst making a proportionate contribution</del> <b>contributing</b> towards <b>meeting</b> the unmet needs of <b>arising within the</b> Greater Birmingham and Black Country Housing Market Area ( <b>GBBCHMA</b> ) and wider <b>South Staffordshire</b> Functional Economic Market Area ( <b>FEMA</b> ). <b>The plan will make a limited contribution towards meeting the unmet housing needs of the GBBCHMA and</b> new housing will be focused on sustainable locations within the district with a particular focus on the district’s most sustainable Tier 1 settlements. <b>A proportionate contribution will also be made towards meeting the unmet strategic employment needs of the FEMA, with employment land focused on sustainable locations within the district and a particular focus on the district’s existing/new freestanding strategic employment sites.</b>	The amendment adds clarity to the council’s position in terms of meeting its own housing and employment needs and providing a contribution to unmet needs. This is needed for the plan to be positively prepared and effective.
MM001	N/A	Pg 22, Table 6	Strategic Objective 6	Amend – Develop an economic strategy that seeks to retain existing employment and fosters sustainable economic growth, encouraging inward investment and job creation in key sectors such as advanced manufacturing <b>and logistics</b> and providing the skills to enable residents to access these jobs.	The amendment adds clarity, reflecting that logistics is a key sector in the district with WMI coming forward. This ensures consistency with national policy.
MM002	N/A	Pg 24	Policy DS1: Green Belt	Amend -	The amendment is required to provide clarity within the policy of the exact

The Green Belt boundary is altered through this Plan to accommodate development **housing** allocations set out in Policies SA1, SA3 and SA5 **and SA3 at the following locations:**

The boundaries of the reviewed Green Belt sites are identified in Appendices B-E of this document and on the policies map.

Site Ref No.	Site location	Hectares of land removed from the Green Belt at this location	Allocations policy
519	Land East of Bilbrook	25.3ha	SA1
224	Land adjacent to 44 Station Road, Codsall	3.4ha	SA3
704	Land off Norton Lane, Great Wyrley	1.3ha	SA3
730	Fishers Farm, Great Wyrley	0.3ha	SA3
536a	Land off Holly Lane, Cheslyn Hay	4ha	SA3
006	Land at Boscomoor Lane, Penkridge	3.8ha	SA3

locations where Green Belt boundary amendments are made and ensures the policy is justified.

				<b>In total 38.1ha of land is removed from the Green Belt through this Plan. The boundaries of the reviewed Green Belt sites are identified in Appendices B and C of this document and on the policies map.</b>																																																																																																																																																																			
MM091	Action 5.2	Pg 31, Table 8	How housing growth will be distributed across the district	<p>Amend Table 8 -</p> <table border="1"> <thead> <tr> <th colspan="2">Spatial Housing Strategy 2023 - 2041</th> <th colspan="4">Indicative minimum dwelling numbers 2023-2041</th> </tr> <tr> <th>Location</th> <th>Total proportion of housing delivery</th> <th>Existing permissions</th> <th>Adopted allocations carried forward</th> <th>Safeguarded land</th> <th>New allocations</th> </tr> </thead> <tbody> <tr> <td><b>The district's rural area</b></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td><b>Tier 1 villages</b></td> <td><b>60.6%</b></td> <td><b>313</b></td> <td><b>106</b></td> <td><b>890</b></td> <td><b>1844</b></td> </tr> <tr> <td>Penkridge</td> <td>24.8%</td> <td>93</td> <td>0</td> <td>88</td> <td>1109</td> </tr> <tr> <td>Codsall/Bilbrook</td> <td>24.5%</td> <td>81</td> <td>29</td> <td>584</td> <td>581</td> </tr> <tr> <td>Cheslyn Hay/Great Wyrley</td> <td>11.3%</td> <td>139</td> <td>77</td> <td>218</td> <td>154</td> </tr> <tr> <td><b>Tier 2 villages</b></td> <td><b>17.6%</b></td> <td><b>299</b></td> <td><b>0</b></td> <td><b>614</b></td> <td><b>0</b></td> </tr> <tr> <td>Wombourne</td> <td>5.7%</td> <td>16</td> <td>0</td> <td>280</td> <td>0</td> </tr> <tr> <td>Brewood</td> <td>1.2%</td> <td>1</td> <td>0</td> <td>63</td> <td>0</td> </tr> <tr> <td>Kinver</td> <td>2.8%</td> <td>61</td> <td>0</td> <td>82</td> <td>0</td> </tr> <tr> <td>Perton</td> <td>7.1%</td> <td>220</td> <td>0</td> <td>150</td> <td>0</td> </tr> <tr> <td>Huntington</td> <td>0.8%</td> <td>2</td> <td>0</td> <td>39</td> <td>0</td> </tr> <tr> <td><b>Tier 3 villages</b></td> <td><b>4.4%</b></td> <td><b>100</b></td> <td><b>28</b></td> <td><b>100</b></td> <td><b>0</b></td> </tr> <tr> <td>Essington</td> <td>1.2%</td> <td>60</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>Coven</td> <td>1.0%</td> <td>3</td> <td>0</td> <td>48</td> <td>0</td> </tr> <tr> <td>Featherstone</td> <td>0.8%</td> <td>8</td> <td>0</td> <td>35</td> <td>0</td> </tr> <tr> <td>Shareshill</td> <td>0.0%</td> <td>2</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>Wheaton Aston</td> <td>0.6%</td> <td>12</td> <td>18</td> <td>0</td> <td>0</td> </tr> <tr> <td>Pattingham</td> <td>0.5%</td> <td>9</td> <td>0</td> <td>17</td> <td>0</td> </tr> <tr> <td>Swindon</td> <td>0.3%</td> <td>6</td> <td>10</td> <td>0</td> <td>0</td> </tr> <tr> <td><b>Tier 4 villages</b></td> <td><b>0.6%</b></td> <td><b>30</b></td> <td><b>0</b></td> <td><b>0</b></td> <td><b>0</b></td> </tr> <tr> <td><b>Growth in other rural locations and Tier 5 settlements</b></td> <td><b>3.7%</b></td> <td><b>194</b></td> <td><b>0</b></td> <td><b>0</b></td> <td><b>0</b></td> </tr> <tr> <td><b>Areas adjacent to neighbouring towns and cities</b></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>South of Stafford at Land at Weeping Cross (Penkridge North East and Acton Trussell Ward) (A34 corridor)</td> <td>1.6%</td> <td>0</td> <td>0</td> <td>0</td> <td>81</td> </tr> <tr> <td><b>Other sources of supply</b></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td><b>Windfall development on small sites</b></td> <td><b>11.5%</b></td> <td><b>600</b></td> <td><b>0</b></td> <td><b>0</b></td> <td><b>0</b></td> </tr> </tbody> </table>	Spatial Housing Strategy 2023 - 2041		Indicative minimum dwelling numbers 2023-2041				Location	Total proportion of housing delivery	Existing permissions	Adopted allocations carried forward	Safeguarded land	New allocations	<b>The district's rural area</b>						<b>Tier 1 villages</b>	<b>60.6%</b>	<b>313</b>	<b>106</b>	<b>890</b>	<b>1844</b>	Penkridge	24.8%	93	0	88	1109	Codsall/Bilbrook	24.5%	81	29	584	581	Cheslyn Hay/Great Wyrley	11.3%	139	77	218	154	<b>Tier 2 villages</b>	<b>17.6%</b>	<b>299</b>	<b>0</b>	<b>614</b>	<b>0</b>	Wombourne	5.7%	16	0	280	0	Brewood	1.2%	1	0	63	0	Kinver	2.8%	61	0	82	0	Perton	7.1%	220	0	150	0	Huntington	0.8%	2	0	39	0	<b>Tier 3 villages</b>	<b>4.4%</b>	<b>100</b>	<b>28</b>	<b>100</b>	<b>0</b>	Essington	1.2%	60	0	0	0	Coven	1.0%	3	0	48	0	Featherstone	0.8%	8	0	35	0	Shareshill	0.0%	2	0	0	0	Wheaton Aston	0.6%	12	18	0	0	Pattingham	0.5%	9	0	17	0	Swindon	0.3%	6	10	0	0	<b>Tier 4 villages</b>	<b>0.6%</b>	<b>30</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>Growth in other rural locations and Tier 5 settlements</b>	<b>3.7%</b>	<b>194</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>Areas adjacent to neighbouring towns and cities</b>						South of Stafford at Land at Weeping Cross (Penkridge North East and Acton Trussell Ward) (A34 corridor)	1.6%	0	0	0	81	<b>Other sources of supply</b>						<b>Windfall development on small sites</b>	<b>11.5%</b>	<b>600</b>	<b>0</b>	<b>0</b>	<b>0</b>	In table 8, the council to separate out permitted windfalls from allocations that have been taken forward from the existing development plan. Ensures the policy is justified.
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MM092	Action 8.8	Pg 42, para 5.46	Gypsies and Travellers	<p>Amend -</p> <p>It is also a requirement of the Local Plan to assess and plan to meet the housing needs of different groups of the community, including Gypsies,</p>	Provides clarity on how the needs of families not meeting																																																																																																																																																																		

				<p>Travellers and Travelling Showpeople. The government's Planning Policy for Traveller Sites (PPTS) 2015 details how travellers' housing needs should be assessed for those covered by the definition in Annex 1 of the 2012 PPTS. The <del>focus of Gypsy, Traveller and Travelling Showpeople policies</del> <b>allocations</b> in this plan is <del>therefore to</del> make provision for those traveller families that meet the definition, with <del>the housing needs of</del> <b>proposals for</b> those not falling within this definition <del>met through general needs housing policies</del> <b>considered through Policy HC9.</b></p>	<p>the planning definition of a traveller will be treated. This ensures a positive approach to meeting these families' needs are taken, ensuring the plan is positively prepared.</p>
MM093	Actions 4.5 & 4.6	Pg 43, para 5.52	The district's employment needs	<p>Amend – The study's main focus was to draw together the market intelligence, economic forecasts and other relevant data to conclude on the employment land needs of the district up until 2041. The study included detailed analysis of employment projections on a sector-by-sector basis utilising data from the three main forecasting houses. The study adjusted the Experian forecast to arrive at a 'LEP based Growth Scenario' and following a series of further adjustments (e.g. building in plan flexibility such as projected employment losses and an increased margin for frictional vacancy), arrived at <b>an objectively assessed employment land need figure for South Staffordshire of <del>62.4ha</del> 81.2ha up to 2041.</b></p>	<p>Ensures clarity is provided on the district's employment land need figure (including proportion of WMI). Required for the plan to be effective.</p>
MM094	Actions 4.5 & 4.6	Pg 44, para 5.54	The district's employment needs	<p>Amend – The EDNA <b>Update 2024</b> undertook further analysis by examining the supply/demand balance for the district, in order to inform the amount of employment land that would need to be allocated through the Local Plan. It considered the supply of employment land at the base date of April 2023 (circa 90ha, excluding WMI) and explored how this would likely be split between strategic and non-strategic employment land supply. Following consideration of the supply/demand balance specifically for strategic sites, it was concluded what proportion of the surplus strategic employment land could be attributed to providing towards sub regional supply and what proportion could be considered providing towards South</p>	<p>Provides clarity to the supporting text, to assist in plan effectiveness.</p>

				Staffordshire's supply, informed by the labour demand forecasts. It concluded that in terms of strategic employment land, 27.6ha of surplus land (excluding WMI) could reasonably be attributed to cross boundary unmet needs in the Black Country FEMA. This increases further to 45.2ha <b>(excluding WMI)</b> when factoring in an additional strategic allocation at M6 Junction 13, Dunston (17.6ha). <b><u>Increasing the supply of employment land by allocating this site positively responds to the EDNA recommendations and that</u></b> boosts the supply pipeline to ensure plan flexibility and that the pipeline of sites more closely reflect recent take up. Meanwhile, the supply-demand balancing exercise that could be attributed to South Staffordshire, taking on board both strategic and non-strategic employment land, concluded there is sufficient supply to meet the council's employment needs based on South Staffordshire's forecast labour demand, with supply/demand broadly in balance.	
MM095	Actions 4.5 & 4.6	Pg 44, para 5.56	Unmet employment needs from the wider functional economic area	Amend (emphasis only) – Of the other authorities within the South Staffordshire FEMA, Cannock Chase District Council (CCDC) are also in the process of preparing their new Local Plan. In February 2024 they consulted on their Pre-Submission (Regulation 19) consultation which indicated that up to 74ha of employment land will be provided over the plan period up to 2040 to meet Cannock's employment needs. <b>There is currently no indication that Cannock are unable to meet this need within their administrative boundary, with the exception being confirmation that they require 10ha from WMI.</b> Stafford Borough consulted on their Preferred Options document in October 2022 which confirmed around 156ha of employment land supply over their emerging plan period. There is no indication to date that Stafford will not be able to meet its own development needs.	Provides clarity on the unmet need position of a neighbouring authority (Cannock). Contribution need for the plan to be positively prepared.
MM096	Actions 4.5 & 4.6	Pg 45, para 5.58	Unmet employment needs from the wider functional economic area	Amend – As such, the findings of the supply/demand exercise and the conclusion in the EDNA <u>Update</u> (2024) that 27.6ha (excluding WMI and M6 Junction 13, Dunston) of strategic employment land is available for unmet cross	Provides clarity on the components of employment supply/ requirements, including

boundary needs has been confirmed. In addition, WMI represents a significant supply of employment land within the district that will come forward within the plan period. As confirmed through the EDNA 2022 and 2024 update, South Staffordshire requires 18.8ha of WMI within our supply to meet our forecast labour demand **for logistics, including an additional allowance to correspond with expectations for job creation identified through the DCO process. This** leaving **leaves** a considerable proportion of the site available to meet cross boundary needs. The Black Country authorities commissioned a report considering the proportion of WMI that could be considered towards their needs based upon projected population change. This identified a minimum 67ha ‘claim’ from WMI for the Black Country authorities, which when taken alongside the 45.2ha<sup>5</sup> surplus of strategic employment land means that **112.2ha of employment land in South Staffordshire is available for ~~strategic~~ cross boundary unmet needs from the Black Country (circa 153ha shortfall)**, subject to agreement through a Statement of Common Ground. **Drawing this together, this results in an employment land requirement of 203.4ha, with the supply of employment land to meet this requirement set out in Table 9 of the Local Plan. This employment land requirement/supply is broken down as follows:**

	<b>Breakdown of employment land requirements / supply to 2041</b>	<b>Hectares (gross)</b>
	<b>South Staffordshire</b>	
A	South Staffordshire objectively assessed employment land need (excluding WMI)	62.4
B	Proportion of WMI attributable to South Staffordshire	18.8
C	Total requirement / supply for South Staffordshire (A+B)	81.2
	<b>Black Country FEMA</b>	

employment land attributed to neighbouring authorities. This is needed for the plan to be positively prepared and effective.

				<table border="1"> <tbody> <tr> <td>D</td> <td>South Staffordshire contribution to unmet needs of the Black Country FEMA (excluding WMI)</td> <td>45.2</td> </tr> <tr> <td>E</td> <td>Proportion of WMI attributable to the Black Country FEMA</td> <td>67</td> </tr> <tr> <td>F</td> <td>Total proportion of employment land requirement / supply attributable to the Black Country FEMA (D+E)</td> <td>112.2</td> </tr> <tr> <td colspan="3" style="text-align: center;"><b>Cannock Chase</b></td> </tr> <tr> <td>G</td> <td>Proportion of WMI attributable to Cannock Chase</td> <td>10</td> </tr> <tr> <td colspan="2"><b>TOTAL EMPLOYMENT LAND REQUIREMENT (C+F+G)</b></td> <td>203.4</td> </tr> </tbody> </table>	D	South Staffordshire contribution to unmet needs of the Black Country FEMA (excluding WMI)	45.2	E	Proportion of WMI attributable to the Black Country FEMA	67	F	Total proportion of employment land requirement / supply attributable to the Black Country FEMA (D+E)	112.2	<b>Cannock Chase</b>			G	Proportion of WMI attributable to Cannock Chase	10	<b>TOTAL EMPLOYMENT LAND REQUIREMENT (C+F+G)</b>		203.4	
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MM097	Actions 4.5 & 4.6	Pg 46	Policy DS4: Development Needs	Amend – Policy DS4: Development Needs During the plan period up to 2041, the council will promote the delivery of <del>a minimum of:</del>	Deletion of ‘minimum of’ and insertion under criteria, a b, and c adds clarity that all development needs figures for the different types of development are minimum figures. Policy DS4 ensures the plan is positively prepared.																		
MM098	Actions 4.5 & 4.6	Pg 46	Policy DS4: Development Needs	Amend clause a) <b>A minimum of</b> 4,726 homes over the period 2023-2041 to meet the district’s housing <del>target</del> <b>requirement</b> , whilst providing approximately 10% additional homes to ensure plan flexibility. This housing <del>target</del> <b>includes</b>	Adds clarity on the plans housing requirement and which element of																		

				<p><b>requirement will meet</b> the district's own housing <b>requirement need</b> of 4,086 homes, plus a 640-home contribution towards unmet housing needs of the Great Birmingham and Black Country Housing Market Area. The council will seek to demonstrate a 5-year housing land supply upon adoption of the plan.</p>	<p>this is to meet the district's needs, and which is to meet cross boundary unmet needs. Policy DS4 ensures the plan is positively prepared.</p>
MM099	MM003  Actions 4.5 & 4.6	Pg 46	Policy DS4: Development Needs	<p>Amend clause b) <b>A minimum of 203.4ha</b> <del>107.45ha</del> of employment land over the period 2023-2041. <del>to ensure that South Staffordshire's identified need for employment land of 62.4ha is met, as well as making available a potential contribution of 45.2ha to the unmet employment land needs of the Black Country authorities.</del> <b><u>This employment requirement includes the district's own employment needs of 81.2ha, plus a 112.2ha contribution to unmet needs of the Black Country Functional Economic Market Area (FEMA) and a 10ha contribution towards Cannock Chase Council.</u></b></p> <p><del>18.8ha of West Midlands Interchange will contribute towards South Staffordshire's employment land supply with an additional minimum 67ha available towards the unmet employment land needs of the Black Country authorities,</del> <b><u>Of the 112.2ha of employment land provided to the Black Country FEMA, 67ha is from the consented West Midlands Interchange (WMI) and which this contribution from the site is a minimum and</u></b> may increase depending on the employment land position of other local authorities in the site's market area. <b><u>The 10ha at WMI will also contribute towards Cannock Chase council meeting their employment land needs contribution to Cannock Chase Council is also from WMI.</u></b> The remaining land supply of West Midlands Interchange (WMI) will be considered with related authorities through the Duty to Co-operate.</p>	<p>Add clarity on the plans' employment requirement and which element of this is to meet the district's needs, and which is to meet cross boundary unmet needs. Policy DS4 ensures the plan is positively prepared.</p>

MM100	Actions 4.5 & 4.6	Pg 46	Policy DS4: Development Needs	<p>Amend clause c)  <b>A minimum of</b> 37 new Gypsy and Traveller pitches. This is the number of pitch options that have been assessed as deliverable against a larger need of 162 pitches, primarily to meet the future needs of existing families within the district. The council has explored numerous options to meet this unmet need, including through ongoing Duty to Co-operate engagement with neighbouring authorities and promoters of residential site allocations, as well as assessing the suitability of publicly owned land.</p>	<p>Adds clarity that all development needs figures for the different types of development are minimum figures. Policy DS4 ensures the plan is positively prepared.</p>								
MM101	Action 5.1	Pg 47 (new para after 5.61)	Development Needs and Spatial Strategy to 2041	<p>Add as new paragraph 5.62 –  <b><u>The district’s settlements are grouped into five tiers which reflect each settlement’s access to services and facilities, relative to other settlements within the district. The settlements within each tier are identified below</u></b>                  =</p> <table border="1" data-bbox="920 762 1803 1473"> <thead> <tr> <th><u>Tier</u></th> <th><u>Settlements</u></th> </tr> </thead> <tbody> <tr> <td><u>Tier 1</u></td> <td><u>Bilbrook</u> <u>Cheslyn Hay</u> <u>Codsall</u> <u>Great Wyrley</u> <u>Penkridge</u></td> </tr> <tr> <td><u>Tier 2</u></td> <td><u>Brewood</u> <u>Huntington</u> <u>Kinver</u> <u>Perton</u> <u>Wombourne</u></td> </tr> <tr> <td><u>Tier 3</u></td> <td><u>Coven</u> <u>Essington</u> <u>Featherstone / Hilton</u> <u>Pattingham</u> <u>Shareshill</u> <u>Swindon</u></td> </tr> </tbody> </table>	<u>Tier</u>	<u>Settlements</u>	<u>Tier 1</u>	<u>Bilbrook</u> <u>Cheslyn Hay</u> <u>Codsall</u> <u>Great Wyrley</u> <u>Penkridge</u>	<u>Tier 2</u>	<u>Brewood</u> <u>Huntington</u> <u>Kinver</u> <u>Perton</u> <u>Wombourne</u>	<u>Tier 3</u>	<u>Coven</u> <u>Essington</u> <u>Featherstone / Hilton</u> <u>Pattingham</u> <u>Shareshill</u> <u>Swindon</u>	<p>The amendment is required to provide clarity within the policy of which settlements are within each tier and ensures the policy is justified .</p>
<u>Tier</u>	<u>Settlements</u>												
<u>Tier 1</u>	<u>Bilbrook</u> <u>Cheslyn Hay</u> <u>Codsall</u> <u>Great Wyrley</u> <u>Penkridge</u>												
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				<u>Wheaton Aston</u>	
			<u>Tier 4</u>	<u>Bednall</u> <u>Bishops Wood</u> <u>Bobbington</u> <u>Dunston</u> <u>Himley</u> <u>Seisdon</u> <u>Trysull</u>	
			<u>Tier 5</u>	<u>Acton Trussell</u> <u>Blymhill</u> <u>Brineton</u> <u>Burnhill Green</u> <u>Calf Heath</u> <u>Codsall Wood</u> <u>Coppenhall</u> <u>Enville</u> <u>Gospel End</u> <u>Great Chatwell</u> <u>Halfpenny Green</u> <u>Hatherton</u> <u>Kingswood</u> <u>Lapley</u> <u>Lawnswood</u> <u>Lower Penn</u> <u>Newtown</u> <u>Oaken</u> <u>Saredon</u> <u>Springhill</u> <u>Stourton</u> <u>Stretton</u> <u>Wedges Mills</u>	

				<u>Weston-under-Lizard</u>	
MM102	Action 5.1	Pg 47	Policy DS5: Spatial Strategy to 2041	Amend – Throughout the district, growth will be located at the most accessible and sustainable locations in accordance with the settlement hierarchy <del>set out below.</del>	The addition of the settlement hierarchy table as paragraph 5.62 results in this amendment, it provides clarity and ensures the policy is justified.
MM104	Action 8.4	Pg 49	Policy DS5: Spatial Strategy to 2041	Amend – The district will seek to meet existing Gypsy, Traveller and Travelling Showpeople needs <del>as far as possible</del> , pursuing a strategy of meeting evidenced needs where they arise throughout the district.	The amendment adds clarity and is required for the policy to be justified and effective.
MM004	N/A	Pg 50	Policy DS5: Spatial Strategy to 2041	Amend – The Spatial Strategy will be delivered through allocations made in this Local Plan and associated planning policies, ensuring development is sustainable, enhances the environment and provides any necessary mitigating or compensatory measures to address harmful implications. <del>In all cases development should not conflict with the policies of the development plan.</del>	The amendment adds clarity and ensures consistency with national policy.
MM005	N/A	Pg 53	Policy MA1: Master Planning Strategic Sites	Amend – This policy shall also apply to large scale <del>or complex</del> applications <b>of 500 dwellings or more</b> on sites not allocated in the plan.	The terminology is unspecific and is not defined within the Plan. The amendment provides clarity and ensures the policy is justified.
MM105	Actions 10 & 11	Pg 53	Policy MA1: Master Planning Strategic Sites	Amend – <del>The scope and contents of the site wide Master Plans will be confirmed by the council in pre-application discussions and will be based upon and informed by community and stakeholder engagement (the exact nature</del>	The amendment adds clarity and ensures the policy is effective.

				<p>will be agreed as part of pre-application discussions) and the relevant site-specific vision, objectives and concept plan as set out in Policies SA1 and SA2, to ensure that development for the whole site is delivered in a comprehensive and co-ordinated manner and is of sufficient quality. The site-wide Master Plans will be a material consideration in the determination of future planning applications related to the relevant site(s) and adherence to it/them will be secured through relevant planning conditions and/or legal agreement. The SMP will include the following:</p> <p><b><u>The scope and contents of the site-wide Master Plans will ensure that development for the whole site is delivered in a comprehensive and co-ordinated manner and is of sufficient quality. The SMP will include:</u></b></p> <p>Clauses a – j (as amended below)</p> <p><b><u>Any necessary exceptions to the clauses or additional criteria will be confirmed by the council through pre-application discussions and will be based upon and informed by community and stakeholder engagement, the relevant site-specific vision, objectives and concept plans. The exact nature of these will be agreed as part of the pre-application discussions.</u></b></p> <p><b><u>The site-wide Master Plans will be a material consideration in the determination of future outline and full planning applications related to the relevant site(s) and adherence to it/them will be secured through planning conditions and/or legal agreement where relevant and necessary.</u></b></p>	
MM106	MM006 Action 12	Pg 55	Policy MA1: Master Planning Strategic Sites	<p>Amend clause h) –</p> <ul style="list-style-type: none"> <li>• <b><u>Country park</u></b></li> <li>• <b><u>Conserve the significance of heritage assets, including their setting</u></b></li> </ul>	An omission from the Regulation 19 version of the plan and is required to reflect the requirements of national policy.

MM007	N/A	Pg 55	Policy MA1: Master Planning Strategic Sites	Amend clause i) - Setting out the approach to formulating <del>provably popular</del> site wide and area (as appropriate) design coding, in keeping with the requirements of the National Model Design Code and accompanying National Model Design Guidance.	The terminology is unspecific and is not defined in the National Model Design Code or National Model Design Guidance. The amendment ensures consistency with national policy.
MM107	Actions 14, 15 & 152	Pg 56	Policy SA1: Land East of Bilbrook	Amend clause b) – <ul style="list-style-type: none"> <li>• Small local convenience retail (<b>up to 500m<sup>2</sup> of floorspace</b>) to serve the day to day needs of the neighbourhood</li> <li>• <b><u>Centrally located high quality flexible community space / plaza to accommodate flexible areas for outdoor seating, cycle parking and pop-ups, such as markets and small outdoor events</u></b></li> </ul>	The amendment adds clarity around the acceptable maximum floorspace and ensures consistency with retail policy EC8. The amendment ensures the clause is justified and effective.
MM108	Action 16	Pg 56	Policy SA1: Land East of Bilbrook	Amend clause c) – and appropriate <b>necessary</b> public transport provision	To reflect the requirements of national policy. The amendment ensures the clause is justified.
MM110	Action 18	Pg 57	Policy SA1: Land East of Bilbrook	Amend clause g) – <del>Any necessary historic environment mitigation for the site, as identified in the council's Historic Environment Site Assessment Stage 2 (2022), including setting back development from the site's eastern edge and reinforcing planting within that boundary and any mitigation required as a result of archaeological investigations;</del>	The amendment adds clarity and ensures the requirement is effective.

				<u>Any necessary assessments, mitigation and/or enhancement requirements relating to impact on the historic environment, as identified in the relevant site assessment proforma (sections E, F, G) in the HESA 2022, in consultation with the council's conservation officer;</u>	
MM111	Action 19	Pg 57	Policy SA1: Land East of Bilbrook	Amend clause j) – Consideration <b>and assessment</b> of potential amenity issues and any mitigation requirements as a result of proximity to existing commercial units to the east of the site.	The amendment adds clarity and ensures the clause is effective.
MM112	MM008 Actions 153 & 22	Pg 60	Policy SA2: Land North of Penkridge	Amend clause b) – <ul style="list-style-type: none"> <li>• A new first school (<del>1.5ha</del>) <b>(1.2ha)</b></li> <li>• Local convenience retail (<b>up to 500m<sup>2</sup> of floorspace</b>) to serve the new neighbourhood</li> <li>• <b><u>Centrally located high-quality flexible community space / plaza to accommodate flexible areas for outdoor seating, cycle parking and pop-ups, such as markets and small outdoor events</u></b></li> </ul>	Staffordshire County Council have confirmed the required site area for the school is 1.2ha. The amendment is required for the clause to be justified.  The amendment provides the acceptable maximum floorspace and ensures consistency with retail policy EC8. The amendments ensure the clause is justified.
MM113	Action 27	Pg 60	Policy SA2: Land North of Penkridge	Amend clause c) – A Community Park on the eastern side of the development ( <b>circa 7.30ha</b> )	The amendment ensures the clause is justified.
MM009	N/A	Pg 60	Policy SA2: Land North of Penkridge	Amend clause e) – The provision of full-size sports pitches to meet national standard along with associated facilities to meet identified need <b>of a type and size</b>	The amendment is based upon emerging site-

				<b><u>determined by up-to-date evidence, in consultation with Sport England, and engagement with the local community.</u></b>	specific evidence and provides for greater flexibility for providing the type and size of sports pitches to reflect evidenced need. This will ensure the clause is justified.
MM010	N/A	Pg 61	Policy SA2: Land North of Penkridge	Amend clause g) – Including an accessible central green space or spaces at the heart of the development.	The amendment is based upon emerging site-specific evidence and provides for greater flexibility, whilst still allowing the Strategic Master Plan to be informed by the Concept Plan. This will ensure the clause is justified.
MM114	Action 23	Pg 61	Policy SA2: Land North of Penkridge	Amend clause h) – <del>Any necessary historic environment mitigation for the site, as identified in the council's Historic Environment Site Assessment Stage 2 (2022), including retention of tree and hedgerow boundaries bordering the site and any mitigation required as a result of archaeological investigations;</del> <b><u>Undertake any necessary assessments, mitigation and/or enhancement requirements relating to impact on the historic environment, as identified in the relevant site assessment proforma (sections E, F, G) in the HESA 2022, in consultation with the council's conservation officer;</u></b>	The amendment adds clarity to ensure the requirement is effective.
MM115	Action IL08	Pg 61	Policy SA2: Land North of Penkridge	Amend clause l) –	The amendment adds clarity and

				Consideration of potential amenity issues and any <b>developer-led</b> mitigation requirements as a result of proximity to the Anaerobic Digestion facility to the north of the site.	ensures consistency with national policy.
MM116	Action 26	Pg 63, para 6.17	Objectives: Land North of Penkridge	Amend – Convenience retail and local community/ <del>employment</del> space (flexible) should be provided as part of the neighbourhood centre to reduce the number of trips required by residents.	The amendment adds clarity to ensure the requirement is effective.
MM011	N/A	Pg 65	Policy SA3: Housing Allocations (Site 285, 562 / 415, 459)	Amend – Minimum capacity (dwellings): <del>223</del> <b>191</b>	The capacity has been reduced due to the presence of electricity pylons and associated easements. This is required for the minimum capacity to be justified.
MM012	N/A	Pg 65	Policy SA3: Housing Allocations (Site 251)	Amend – Minimum capacity (dwellings): <del>17</del> <b>15</b>	The capacity and site area have been amended in line with emerging site-specific evidence. This is required for the minimum capacity to be justified.
MM119	Actions 8.3 & 5	Pg 68  (new para after 6.41)	Gypsy and Travellers	Add as new paragraph 6.42 – <b><u>A number of Gypsy and Traveller pitch allocations were previously allocated under Policy SAD4 of the Site Allocations Document (SAD) 2018, which have been carried forward and allocated under Policy SA4 of this plan. Details of these are set out in the table below:</u></b>	Required for effective understanding of Policy SA4.

				<u>Site Ref.</u>	<u>Site name</u>	<u>Number of pitches previously allocated in the SAD 2018 which are being carried forward to this Local Plan</u>	<u>Number of additional new pitches allocated in this Local Plan</u>	<u>Total pitches allocated in this Local Plan</u>		
				<b><u>GT06</u></b>	<b><u>The Spinney, Slade Heath</u></b>	<b><u>1</u></b>	<b><u>1</u></b>	<b><u>2</u></b>		
				<b><u>GT07</u></b>	<b><u>The Bungalow, Coven</u></b>	<b><u>2</u></b>	<b><u>1</u></b>	<b><u>3</u></b>		
				<b><u>GT08</u></b>	<b><u>Brinsford Bridge, Coven Heath</u></b>	<b><u>1</u></b>	<b><u>6</u></b>	<b><u>7</u></b>		
				<b><u>GT17</u></b>	<b><u>The Stables, Upper Landywood</u></b>	<b><u>2</u></b>	<b><u>1</u></b>	<b><u>3</u></b>		
				<b><u>GT18</u></b>	<b><u>Park Lodge, Wombourne</u></b>	<b><u>2</u></b>	<b><u>0</u></b>	<b><u>2</u></b>		
				<b><u>GT23</u></b>	<b><u>Glenside, Slade Heath</u></b>	<b><u>2</u></b>	<b><u>1</u></b>	<b><u>3</u></b>		
				<b><u>Totals</u></b>		<b><u>10</u></b>	<b><u>10</u></b>	<b><u>20</u></b>		
MM120	Actions 4.4 & 64  *no cover note for Action 64	Pg 69-70, para 6.43-6.44	Employment	Amend – Employment land should be identified to meet the needs of all employment uses; offices, research and development, light/general industrial, and storage/distribution. The level of employment sites and premises required to meet South Staffordshire requirements over the plan period was calculated in the council’s Economic Development Needs Assessment (EDNA) <u>U</u> update 2024, which identified an objectively					Provides clarity to the supporting text, to assist in plan effectiveness.	

				<p>assessed need for employment land for South Staffordshire over the period 2023- 2041 of <del>62.4</del> <b>81.2</b>ha.</p> <p>As confirmed through the EDNA <u>Update 2024</u>, the pipeline supply of employment land over the plan period is sufficient to meet South Staffordshire’s needs as well as provide surplus available to contribute towards cross boundary unmet needs. The district’s main employment areas are set out in Table 9 below which details <del>and</del> the amount of employment land available (in hectares gross) for the period 2023-2041 on a site-specific basis (<del>excluding supply from smaller windfall developments</del>). This includes proposed allocated sites and sites with planning permission that are not started or under construction at April 2023. <b><u>The supply reflects the figures factored into the EDNA Update 2024 supply/demand balance exercise.</u></b></p>					
MM121	<p>Actions 4.4 &amp; 64</p> <p>*no cover note for Action 64</p>	Pg 70-71, Table 9	Employment		<p>Site Name</p>	<p>Parish(es)</p>	<p><b><u>Supply of Available Land for Employment Development 2023-2041 - site areas (gross hectares)<sup>1</sup>(Ha)</u></b></p>	<p>Required for plan effectiveness, to understand the pipeline supply of sites to come forward over the plan period.</p>	
				<p>Strategic Employment Sites</p>	<p><b><u>West Midlands Interchange (WMI)</u></b></p>	<p><b><u>Penkridge. Brewood &amp; Coven</u></b></p>	<p><b><u>South Staffordshire’s proportion of WMI</u></b></p>		<p><b><u>18.8</u></b></p>
							<p><b><u>Black Country FEMA proportion of WMI</u></b></p>		<p><b><u>67</u></b></p>
							<p><b><u>Cannock’s proportion of WMI</u></b></p>		<p><b><u>10</u></b></p>

					Four Ashes Industrial Estate, Four Ashes (inc. Bericote)	Penkridge. Brewood & Coven	0.16	
					Hilton Cross Business Park	Featherstone	0.0	
					ROF Featherstone.	Featherstone	<del>39.5</del> 36.0	
					i54, Wobaston Road	Bilbrook	4.8	
					I54 Western Extension	Bilbrook	<del>37.3</del> 40	
					M6, Junction 13, Dunston	Dunston	17.6	
				Other main Employment areas	Acton Gate	Dunston	0.0	
					Balliol Business Park	Bilbrook	0.0	
					Coppice Lane, Cheslyn Hay	Cheslyn Hay	0.0	
					Dunston Business Village	Dunston	0.1	
					Essington Light Industrial Estate	Essington	0.0	
					Hobnock Road	Essington	**0.0	5.2
					Hawkins Drive Industrial Estate	Cheslyn Hay	0.0	
					Hepworth Site, Warstones Road	Essington	0.0	
					Heathmill Road Industrial Estate	Wombourne	0.0	
					Hilton Main Industrial Estate	Featherstone	0.0	

				Vernon Park	Featherstone	<del>2.72</del> -8
				Huntington Industrial Estate	Huntington	0.0
				Kingswood Business Park	Perton	0.0
				Landywood Enterprise Park	Great Wyrley	0.0
				Landywood Lane Industrial Estate	Cheslyn Hay	0.0
				Littleton Business Park	Huntington	0.0
				Loades plc., Gorsey Lane	Great Wyrley	<del>0.0</del>
				Owens Trading Estate	Bilbrook	0.0
				Paradise Lane, Slade Heath	Featherstone	0.0
				Former Sandvik Site, Brinsford	Featherstone	0.0
				Smestow Bridge Industrial Estate	Wombourne	0.0
				Wolverhampton <b>Halfpenny Green Business Airport</b>	Bobbington	0.0
				Wombourne Enterprise Park	Wombourne	<del>0.20</del> -8
				<b>Windfall committed supply</b>	=	<b>5.2</b>

				<table border="1"> <tr> <td></td> <td><b><u>TOTAL inc cross boundary contributions from WMI</u></b></td> <td><b><u>203.4ha</u></b></td> </tr> <tr> <td></td> <td><b><u>TOTAL exc. Cross boundary contributions from WMI</u></b></td> <td><b><u>126.4ha<sup>2</sup></u></b></td> </tr> </table>		<b><u>TOTAL inc cross boundary contributions from WMI</u></b>	<b><u>203.4ha</u></b>		<b><u>TOTAL exc. Cross boundary contributions from WMI</u></b>	<b><u>126.4ha<sup>2</sup></u></b>
	<b><u>TOTAL inc cross boundary contributions from WMI</u></b>	<b><u>203.4ha</u></b>								
	<b><u>TOTAL exc. Cross boundary contributions from WMI</u></b>	<b><u>126.4ha<sup>2</sup></u></b>								
<p>*18.8ha of <b><u>the site is</u></b> required to meet South Staffordshire’s labour demand plus additional allowance. <b><u>Although the site is 297ha (gross) it is assumed that the site will deliver 193ha of gross developable employment land.</u></b></p> <p>** This land <b><u>is 5.2ha and currently undeveloped but</u></b> has benefited from a certificate of lawful use for B2 use for over 10 years, however is in the Green Belt. <b><u>As its Green Belt status introduces some uncertainty on whether the site will come forward,</u></b> and therefore as a precautionary measure <b><u>the 5.2ha</u></b> is not included in the supply total.</p> <p>Table 9: South Staffordshire Employment <b><u>supply</u></b>tock (district’s main employment areas <b><u>including contributions from WMI to the Black Country FEMA and Cannock</u></b>)</p> <p><sup>1</sup> <b><u>As per the EDNA 2024 Update, where planning permission has been consented on these sites then the site area has been derived from the consented floorspace by converting it to gross hectares via a 0.4 plot ratio.</u></b></p>										

				<sup>2</sup> <b>Note that this supply figure does vary from the supply figure of 108.8ha in the EDNA 2024 Update (90ha +18.8ha at WMI), as Table 9 also includes the new allocation at M6, Junction 13 (17.6ha)</b>	
MM122	<p>Actions 4.4 &amp; 64</p> <p>*no cover note for Action 64</p>	Pg 71, para 6.45-6.46	Employment	<p>Amend –</p> <p><b><u>The figures for West Midlands Interchange (WMI) in Table 9 do not reflect the full site size that is being allocated 297ha (gross) through Policy DS5. Rather, it includes South Staffordshire’s proportion of the site – 18.8ha – that is derived from our EDNA 2022 and EDNA Update 2024. This evidence concluded that this is the amount of land needed to meet the district’s labour demand requirements for logistics, including an additional allowance to correspond with expectations for job creation identified via the DCO process. Table 9 also includes the elements of WMI that will contribute towards the Black Country FEMAs employment land needs (67ha) and Cannock Chase Council’s needs (10ha), as agreed through Statements of Common Ground and reflected in Policy DS4.</u></b> The figure for the available land at WMI reflects the gross site area as consented through the Development Consent Order (DCO) process. Initial applications in accordance with the DCO consent have now started to be determined, and the site will continue to be built out over the majority of the plan period. WMI is therefore allocated for employment development in line with the DCO consent, however, will remain washed over by Green Belt. This will provide certainty that the site will come forward in accordance with the DCO, reducing the risk that alternative forms of development could come forward. The council will continue to work positively with the developers on WMI to ensure the site comes forward in accordance with the DCO and delivers the best scheme possible. It is recognised that WMI meets a wider than local need. Our EDNA 2022 and EDNA Update 2024 has considered this issue and concluded that 18.8ha of the site is needed to meet the district’s labour demand requirements for logistics, including an additional allowance to correspond with expectations for job creation identified via the DCO process.</p>	<p>Provides clarity on the Council’s proportion of WMI and agreed cross boundary contributions. Approach ensures plan is positively prepared.</p>

				<p>The plan also allocates an additional strategic employment site at M6 Junction 13, Dunston. This site has the advantage of being non-Green Belt land and is strategically well located adjacent <b>to</b> the motorway junction. Whilst this site is not needed to increase the district's supply of employment land to meet our own objectively assessed needs for employment land (<b>81.2ha</b>), allocating this site ensures plan flexibility and ensures a very healthy pipeline of sites in the district.</p>	
MM123	Action 101  *no cover note for Action 101	Pg 72	Policy SA5: Employment Allocations	<p>Amend – The following sites will be allocated to ensure that the <del>district's</del> <b>plans</b> employment land requirements identified in Policy DS4 is met.</p>	Amendment needed for policy effectiveness, clarifying that Policy DS4 covers the plans requirements, rather than just the districts.
MM124	Action 99	Pg 72	Policy SA5: Employment Allocations	<p>Amend – West Midlands Interchange (E33) The WMI employment site allocation (E33) is for a Strategic Rail Freight Interchange (SRFI) and will be progressed in-line with the Development Consent Order (DCO) that granted permission on 4 May 2020. WMI remains washed over by Green Belt.</p> <p><b><u>All site allocations will be delivered in accordance with the individual site planning requirements set out in Appendix E and any other mitigation which is deemed necessary, through the development management process.</u></b></p>	Amendment needed for policy effectiveness, to ensure a hook to the site-specific requirements.
MM125	Action 49	Pg 76	Policy HC2: Housing Density	<p>Amend – <del>In central areas w</del><b>Where</b> it would help to support the delivery of new local services and facilities, sites will be encouraged to exceed this minimum density standard <b>when adjacent to such community infrastructure</b>, where this could be done in a manner consistent with other development plan</p>	Amendment needed for policy effectiveness, making it clear when higher density than the minimum

				policies, particularly those relevant to the character of the surrounding area.	standard is acceptable.
MM013	N/A	Pg 77, para 7.7	Affordable Housing	Amend – Taking into account both South Staffordshire’s need and the contribution to meeting unmet needs in the wider Housing Market Area, the Housing Market Assessment 2024 recommends approximately 29% of new housing delivered up to 2041 should be provided as affordable housing. <b><u>This equates to a minimum of 1,371 affordable homes over the plan period.</u></b> Just over half of this need is for rented homes, with the remainder split almost equally between First Homes and shared ownership.	The inclusion of the affordable housing target allows for effective monitoring of affordable housing delivery. This adds clarity and is required for the policy to be justified.
MM126	Action 51	Pg 78	Policy HC3: Affordable Housing	The affordable housing should then be broken down by tenure as follows: <ul style="list-style-type: none"> <li>• <del>25%</del> First Homes</li> <li>• 50% Social Rent</li> <li>• <del>50</del>25% Shared Ownership</li> </ul> <p><del>The council will consider what local eligibility criteria should be implemented for the delivery of First Homes and detail these in the Affordable Housing SPD.</del> The mix of property sizes and types of affordable housing will be determined in accordance with Policies HC1 and HC4.</p>	There is no longer justification for including 25% First Homes as part of the tenure split of affordable housing.
MM127	Action 50	Pg 79	Policy HC3: Affordable Housing	Amend – Planning applications that comply with up-to-date policies in this plan will be assumed to be viable. Consideration will not be given to reducing the affordable housing contribution on the grounds of viability unless the applicant can first demonstrate <del>to the satisfaction of the council</del> that particular circumstances justify a viability assessment at application stage, <del>as per the PPG.</del> <b><u>In considering its position, the council will have regard to the illustrative list of circumstances set out in the PPG.</u></b>	Amendment needed for policy effectiveness to add clarity on how the council will treat viability assessments.
MM128	Action 52	Pg 80-81	Policy HC4: Homes for older people and others with	Amend – All major housing developments will be required to demonstrate how the proposal clearly contributes to meeting the needs of older and disabled	Amendment needed for policy effectiveness to provide greater

			special housing requirements	people. <b><u>In order to do so</u></b> , The council will expect housing, as part of the wider <b><u>overall</u></b> mix of the site, to <b><u>include homes</u></b> be provided in <b><u>one or more of</u></b> the following forms, in order to provide a range of general and specialist housing options and meet <b><u>reflecting</u></b> the objectives of the adopted Housing and Homelessness Strategy:	clarity on implementation.
MM129	MM014 Action 52	Pg 80-81	Policy HC4: Homes for older people and others with special housing requirements	Add as new paragraph after the bullet points: <b><u>Applicants are strongly encouraged to engage with the council as early as possible to determine which category or categories of housing will be most appropriate for their site from the above list. Individual site circumstances, such as the location and scale of the development, will be taken into consideration, alongside the requirements of Policy HC1 to create a mixed community.</u></b>  <b><u>Any proposals for sheltered/retirement living, and extra care/housing with care as part of a larger housing development should also be consistent with the criteria set out in Policy HC5.</u></b>	The type of homes for older people which should be provided (including which category or categories from the list in the policy) will be dependent on the circumstances of each specific site, including the scale of development, and the policy has been updated to reflect this. This adds clarity and is required for the policy to be justified.
MM015	N/A	Pg 83	Policy HC6: Rural Exception Sites	Amend clause a) - The site lies <b><u>beyond but</u></b> immediately adjacent to the development boundary of the settlement.	The amendment adds clarity and ensures consistency with national policy.
MM131	Actions 53, 54 & 55	Pg 85-86, para 7.19-7.20  'Key Evidence & Implementation'	Policy HC7: First Homes Exception Sites	Delete - Supporting text at paragraphs 7.19-7.20, Policy HC7 and Key Evidence and Implementation sections, all in their entirety.	Policy is no longer justified or consistent with national policy.

MM132	Actions 56 & 57	Pg 87	Policy HC8: Self-build and Custom Housebuilding	Amend - Major developments will be required to have regard to the need on the council's self-build register, and make provision of self and custom build plots to reflect this. The council may require a design code to be agreed with the applicant and implemented for development of the plots, <b><u>for example in sensitive areas affected by heritage or landscape constraints.</u></b>	Amendment required for policy effectiveness to provide further information on when a design code could be needed.
MM133	Actions 56 & 57	Pg 87	Policy HC8: Self-build and Custom Housebuilding	Amend - Developers will be required to actively market plots at a reasonable price <b><u>(with reference to comparable sales and valuation data)</u></b> for a minimum of 12 months from the date the relevant planning permission is issued. If after this period, the plot has not been sold, the developer will be permitted to build out the plot as a standard property type, for the same tenure as was first approved. Requirements for marketing and notifying the council will be secured through a Section 106 agreement.	Amendment required for policy effectiveness to clarify how the council will determine a reasonable price.
MM134	Actions 8.1, 8.5, 8.6 & 8.7	Pg 88	Gypsies, Travellers and Travelling Showpeople	Amend - The PPTS confirms that criteria-based policies should be fair and should facilitate traditional and nomadic life of travellers while respecting the interests of the settled community. This policy is therefore needed to ensure that the new sites/pitches are located in the right areas, are well designed, function effectively, and meet the needs of our Gypsy, Traveller and Travelling Showpeople communities', whilst also protecting the amenity of neighbouring residential areas. <b><u>Proposals for Gypsy, Traveller and Travelling Showpeople sites will need to meet the relevant criteria in Policy HC9, alongside other relevant policy requirements in the plan such as those relating to flood risk and Biodiversity Net Gain.</u></b>	To aid in the effective interpretation of Policy HC9.
MM135	Actions 8.1, 8.5, 8.6 & 8.7	Pg 88 (new para after 7.25)	Gypsies, Travellers and Travelling Showpeople	Add as new paragraph 7.26 – <b><u>Policy HC9 also sets out the policy requirements for residential moorings to accommodate boat dwellers. Whilst in recent times planning permission has not been sought for residential moorings, as a number of important canals pass through the district, it is important that there is a policy basis for considering such proposals should they be proposed.</u></b>	To aid in the effective interpretation of Policy HC9.

MM136	<p>Actions 8.1, 8.5, 8.6, 8.7 &amp; 3</p> <p>*no cover note for Action 3</p>	Pg 88-90	Policy HC9: Gypsies, Travellers and Travelling Showpeople	<p>Amend - Policy HC9: Gypsies, Travellers, <del>and</del> Travelling Showpeople <b>and Boat Dwellers</b></p> <p><b><u>Gypsies, Travellers and Travelling Showpeople</u></b></p> <p>Applications for Gypsy, Traveller and Travelling Showpeople pitches or plots will <del>only</del> be supported where all of the following <b>relevant</b> criteria are met:</p> <p>a) Essential services such as power, water, drainage, sewage disposal and refuse/waste disposal are provided on site.</p> <p>b) The site is well designed and landscaped with clearly demarcated site and pitch boundaries using appropriate boundary treatment and landscaping sympathetic to, and in keeping with, the surrounding area. Where tree and hedgerow boundaries border the site these should be retained and <del>where possible</del> strengthened <b><u>where this would be sympathetic to the wider landscape character.</u></b></p> <p><del>b) c)</del> <b><u>The site is in an accessible location.</u></b></p> <p><del>c) d)</del> <b><u>The amenity of the site's occupiers and neighbouring residential properties is protected in accordance with Policy HC11.</u></b> Sites must be designed to ensure privacy between pitches and between the site and adjacent users, <del>including residential canal side moorings.</del> Proposals for caravans in residential gardens will be refused where they have an adverse impact on the amenity of neighbouring properties.</p> <p><del>d) e)</del> <b><u>The site can be safely and adequately accessed by vehicles towing caravans, is well related to the highway network, and provides adequate space within the site to accommodate vehicle parking and turning space to accommodate the occupants of the site.</u></b></p>	To ensure that the policy is consistent with national policy and is effective, including having adequate provision through the new criteria (i) to deliver windfall developments.
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e) **f)** ~~The proposal, either in itself or cumulatively having regard to existing neighbouring sites, is of an appropriate scale so as to not put unacceptable strain on infrastructure or and would be of a suitable scale itself and cumulatively to integrate with the nearest settled community. dominate the nearest settled communities, to avoid problems of community safety arising from poor social cohesion with existing families.~~

**g)** Pitches are of an appropriate scale for the size and number of caravans to be accommodated, without over-crowding or ~~unnecessary sprawl.~~ . Site intensification or extensions resulting in additional pitches may be considered acceptable in principle, subject to it being for a proven existing local family need, and acceptable in terms of other planning policies and licencing requirements. A single pitch to accommodate immediate family should only consist of one static caravan and one tourer caravan unless it can be demonstrated that additional caravans are necessary on the pitch to avoid overcrowding.

**h)** Built development in the countryside outside the development boundaries is kept to the minimum required, in order to minimise the visual impact on the surrounding area. ~~Where proposals are in the Green Belt, proposals will only be acceptable where they conform to Policy DS1. The proposed allocations of new pitches in the Green Belt set out in Policy SA4 will be acceptable in principle, subject to conformity with Policy SA4 and all criteria in this policy.~~

**i)** Where proposals for additional pitches are in the Green Belt, proposals will be acceptable where, all relevant criteria of this policy are met, and at least one of the following applies:

- The proposal conforms to Policy DS1; or

				<ul style="list-style-type: none"> <li>• <u>The proposal is in conformity with an allocation within Policy SA4 and all relevant criteria in this policy; or</u></li> <li>• <u>There is a proven existing local family need, and the proposal is on previously developed land and/or any other land that, in either case, does not strongly contribute to Green Belt purposes (a), (b), or (d), excluding any land where the application of the policies relating to the areas or assets in footnote 7 of the NPPF (other than Green Belt) would provide a strong reason for refusing or restricting development</u></li> </ul> <p>g) i) Any amenity buildings proposed are of an appropriate scale and reasonably related to the size of the pitch or pitches they serve.</p> <p>h) <del>Proposals are not located in areas at high risk of flooding.</del></p> <p>k) Where the proposal is for travelling showperson provision, the site is large enough for the storage, maintenance and testing of items of mobile equipment, and does not have an unacceptable impact on the amenity of neighbouring residential properties, including canal side residential moorings.</p> <p>l) Where the proposal is for a transit site, proposals avoid locations that are accessed via narrow country lanes, <del>and are</del> <b>Proposals must be</b> in locations with good access to the strategic highway network.</p> <p>Applications for pitches from individuals that do not meet the planning definition set out in Annex 1 of Planning Policy for Traveller Sites will also be considered in line with this criteria-based policy and other relevant policies on a case-by-case basis.</p> <p><b><u>Boat Dwellers</u></b></p>	
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				<p><b><u>Development proposals for new residential moorings will be supported where:</u></b></p> <ul style="list-style-type: none"> <li>a) <b><u>There would be no unacceptable impact on the operational, navigational or safety requirements of the watercourse or tow paths;</u></b></li> <li>b) <b><u>Adequate access for emergency services to the mooring(s) exists or can be provided as part of the development to ensure safety;</u></b></li> <li>c) <b><u>The site is in a accessible location;</u></b></li> <li>d) <b><u>There is adequate car parking, where relevant, taking into account the number of moorings and the location of the site;</u></b></li> <li>e) <b><u>The site is connected or is capable of being connected to suitable utilities and on-site services including water supply, electricity and disposal facilities for sewage and waste, as far as is practicable;</u></b></li> <li>f) <b><u>There would be no unacceptable visual or amenity impacts to the watercourse and nearby land uses, with moorings designed to provide boaters privacy.</u></b></li> </ul> <p>Development proposals should be consistent with other Local Plan policies</p>	
MM137	Action 104	Pg 91	Policy HC10: Design Requirements	<p>Amend clause c) -          Incorporates tree lined streets, unless there are strong reasons why this would be inappropriate, particularly along primary highway routes through the site.</p>	<p>Whilst tree lined streets are promoted by national policy this approach may not be practically deliverable in all situations. This amendment adds clarity and is required for the policy to be justified.</p>

MM018	N/A	Pg 91	Policy HC10: Design Requirements	Amend clause e) - Ensures attractive and distinctive development with use of a variety of materials that will remain attractive through the lifetime of the development. <del>and uses bespoke house types to avoid a monotonous visual appearance.</del> <b><u>Developments should make use of distinctive buildings and detailing to avoid a monotonous visual appearance, aid orientation and navigation as well as helping to create local character and familiarity.</u></b>	It is considered that the previous reference to 'bespoke house types' was overly onerous. The amendment adds clarity and is required for the policy to be justified.
MM019	N/A	Pg 92	Policy HC10: Design Requirements	Add new clause t) – <b><u>take a comprehensive and co-ordinated approach to development including respecting existing site constraints, including utilities situated within sites.</u></b>	The amendment adds clarity and ensures consistency with national policy.
MM138	Action 105	Pg 93	Policy HC10: Design Requirements	Amend – Developments proposed to come forward alongside other adjacent <del>or closely related</del> sites with similar delivery timescales must prepare a framework plan to show how a comprehensive and integrated layout could be achieved alongside other sites in the area.	"Closely related" is not defined, the amendment therefore adds clarity and is required for the policy to be justified.
MM139	Action 107	Pg 93, para 8.4	Protecting Amenity	Amend - Policy HC11 sets out the general principles relating to local amenity particularly in respect of important issues such as privacy, noise and disturbance and pollution including the amenity of residents living adjacent to buildings in agricultural use. <b><u>The assessment of impacts arising from proximity to a noise generating use will need to be undertaken on a case-by-case basis to reflect the distinctive circumstances of each site.</u></b> The policy also considers reasonable levels of private amenity space and seeks to safeguard the amenity of neighbours and the natural environment. This policy is important for ensuring that new development does not have an adverse impact on the wellbeing of residents because of amenity issues.	The amendment indicates that assessments will be required on a case-by-case basis. The amendment adds clarity in relation to policy expectations and will ensure that the requirement is effective.

MM140	Action 109	Pg 93  (new para after 8.4)	Protecting Amenity	Add as new paragraph 8.5 – <b><u>To facilitate an assessment of potential impacts on amenity arising from new development a range of supporting information may be requested depending on the particular circumstances under consideration. This could include though is not restricted to a Design and Access Statement; Daylight and Sunlight Assessment; Noise Impact Assessment; Privacy/Overlooking Assessment; Air Quality Assessment and Light Assessment.</u></b>	Addition to the supporting text to provide an indication of the information that will be required to enable an assessment of amenity impacts to be undertaken, which is required for the policy to be justified.
MM141	Action 106	Pg 94	Policy HC11: Protecting Amenity	Amend - Noise sensitive developments <del>such as housing development</del> will not be permitted in the vicinity of established noise generating uses where potential for harmful noise..  Sensitive developments <del>such as housing</del> will not be permitted in the vicinity of established sources of pollution which may give rise to harm to the amenity of occupants.	The amendment adds clarity and is required for the policy to be justified and effective.
MM142	Action 108	Pg 94	Policy HC11: Protecting Amenity	Amend – Development must not <del>unacceptably</del> reduce the existing level of amenity space about buildings, particularly dwellings, and not <del>unacceptably</del> affect the amenity of residents or occupants.	“Unacceptably” is not defined, the amendment therefore adds clarity and is required for the policy to be justified.
MM143	Actions 110 & 111	Page 94  (new para after 8.7)	Space about dwellings and internal space	Add as new paragraph 8.8 - <b><u>The Core Strategy (2012) set out a detailed set of standards for external space and distances between dwellings, which broadly have been very successfully implemented to date, making a positive contribution to the overall design and layout of new development in the district. Reflecting</u></b>	It is no longer considered justified to include these provisions in the policy itself – they have been moved to

				<p><b><u>the requirements of Policy HC12 below, the council considers the following principles (consolidated from the Core Strategy) remain a suitable starting point for developers to aim to achieve:</u></b></p> <div style="border: 1px solid black; padding: 5px;"> <p><b><u>External space</u></b></p> <p><b><u>Private amenity space to be at least 10 metres in length, with total area of the garden at least:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>45 square metres for dwellings with 2 or less bedrooms</u></b></li> <li>• <b><u>65 square metres for dwellings with 3 and 4 bedrooms</u></b></li> <li>• <b><u>100 square metres for dwellings with 5 or more bedrooms</u></b></li> <li>• <b><u>10 square metres per unit for flats/apartments provided in shared amenity areas</u></b></li> </ul> <p><b><u>Distances between dwellings</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>At least 21m between facing principal windows (the main or largest glazed area of a room)</u></b></li> <li>• <b><u>At least 14m from a principal window when it faces the wall of another dwelling with no principal window</u></b></li> <li>• <b><u>At least 10.5m from a principal window when the facing wall forms part of a single storey structure</u></b></li> </ul> </div> <p><b><u>Notwithstanding the above guidance, the council will take a flexible approach to external space and space about dwellings, to reflect site specific matters such as historic buildings and heritage, property orientation and individual site circumstances.</u></b></p>	<p>the supporting text as guidance.</p>
<p>MM144</p>	<p>Actions 110 &amp; 111</p>	<p>Pg 95-96</p>	<p>Policy HC12: Space about dwellings and internal space</p>	<p>Amend - The design of new housing should improve the overall quality of development in South Staffordshire, to create a place that people find attractive to live and work in. New development should be designed to take account of individual buildings, their inter-relationships and the character of its surroundings.</p> <p><b><u>External space and space about dwellings</u></b></p>	<p>Amendment required for policy effectiveness, to add clarity on which parts of the policy apply to internal and external space (in light of modification above).</p>

				Consideration should be given to the layout and design of new housing development, so that a satisfactory standard of spacing around dwellings is achieved, considering outlook, privacy, safety, crime prevention and energy conservation.	
MM145	Actions 110 & 111	Pg 96	Policy HC12: Space about dwellings and internal space	<p>Delete - <u>External Space</u></p> <p>All private amenity space should be a minimum of 10 metres in length and the total area of the garden should be a minimum of:</p> <ul style="list-style-type: none"> <li>• 45 square metres for dwellings with 2 or less bedrooms;</li> <li>• 65 square metres for dwellings with 3 and 4 bedrooms;</li> <li>• 100 square metres for dwellings with 5 or more bedrooms;</li> <li>• 10 square metres per unit for flats/apartments provided in shared amenity areas.</li> </ul> <p>Flexibility may be applied in relation to the above standard, depending upon the site orientation and the individual merits of the development proposal.</p> <p><u>Distances between Dwellings</u></p> <p>Dwellings should be designed and sited so as to ensure that all of the following are met:</p> <ol style="list-style-type: none"> <li>a) There is a minimum distance of 21 metres between facing principal windows.*</li> <li>b) There is a minimum distance of 14 metres from a principal window when it faces the wall of another dwelling with no principal window.</li> <li>c) There is a minimum distance of 10.5 metres from a principal window when the facing wall forms part of a single storey structure.</li> </ol>	It is no longer considered justified to include these provisions in the policy itself – they have been moved to the supporting text as guidance.

				<p>Flexibility may be applied in relation to the above garden length standard, depending upon the site orientation and the individual merits of the development proposal.</p> <p>Development proposals should be consistent with other Local Plan policies.</p> <p>* Principal windows are considered the main or largest glazed area of a room.</p>	
MM146	Action 116	Pg 99	Policy HC14: Health Infrastructure	<p>Amend –</p> <p>Where it is demonstrated that existing facilities do not have capacity to accommodate patients from new development and that the development will result in an unacceptable impact on these existing local facilities, then a proportionate financial contribution or on-site provision will be sought and agreed through engagement with the ICS <b><u>and in line with the health providers formula for calculating contributions.</u></b></p>	Modification is proposed to clarify the approach which will be adopted towards calculating health infrastructure contributions and will ensure the policy is justified and effective.
MM147	Action 118	Pg 100  (new para after 9.3)	Education	<p>Add as new paragraph 9.4 –</p> <p><b><u>Where loss of facilities are being promoted, a robust business case must be advanced which demonstrates why the closure is necessary offering a clear justification for why the school must close, consider a range of options including maintaining the status quo and merger as well as the proposal to close. A cost benefit analysis should be produced indicating social and financial costs as well as the perceived benefits. Evidence should also be provided that the remaining schools in the locality have sufficient capacity to accommodate the displaced pupils.</u></b></p>	The amendment adds clarity on how the policy will be implemented and ensures the policy is justified.
MM020	N/A	Pg 100	Policy HC15: Education	<p>Amend –</p> <p>Where feasible the council will aim to co-locate new facilities with local centres and will support the co-location of compatible community facilities with school provision.</p>	The amendment adds clarity on how the policy will be implemented and

				<b><u>New education infrastructure will be required from major new residential development in line with the latest Staffordshire Education Infrastructure Policy. Contributions will not be sought from specialist accommodation for elderly residents.</u></b>	ensures the policy is justified.
MM021	N/A	Pg 103	Policy HC17: Open Space	Amend – <del>Smaller areas of</del> incidental green infrastructure without a clear recreational purpose	“Smaller area” is not defined, the amendment therefore adds clarity and is required for the policy to be justified.
MM022	N/A	Pg 105, para 9.14	Sports Facilities and Playing Pitches	Amend – The policy also sets out how new residential development will contribute to the provision of new facilities or improvements to existing facilities to ensure there is capacity to cope with demand generated from new residents. <b><u>The Sports England playing pitch and indoor facilities calculators will be used to inform the level of contributions required.</u></b>	The amendment adds clarity on how the policy will be implemented and ensures the policy is justified and effective.
MM148	Action 122	Pg 105	Policy HC18: Sports Facilities and Playing Pitches	Amend clause c) - the development is for alternative sports and recreational provision, the benefits of which <del>clearly</del> outweigh the loss of the current or former use.	“Clearly” is subjective, the amendment therefore adds clarity and is required for the policy to be justified.
MM149	Action 124	Pg 105	Policy HC18: Sports Facilities and Playing Pitches	Amend – <del>The council will prepare an Open Space, Sport and Recreation Supplementary Planning Document.</del>  <del>Development proposals should be consistent with other Local Plan policies.</del>	Modification to remove reference to the SPD from the policy. This will clarify the status of the SPD and is consistent with national policy.

MM151	Action 61	Page 109, para 10.3	Sustainable Economic Growth	<p>Amend - A sustainable economic growth policy is set out, indicating how the council will encourage growth including inward investment in key growth sectors such as Auto-Aero and Agri-Tech. The policy identifies the types of locations that new employment growth will be permitted within, and how this will be done in an environmentally sensitive manner. As part of this policy the newly consented strategic rail freight interchange known as West Midlands Interchange (WMI) is recognised as a new freestanding strategic employment site, recognising the scale and strategic location of the site, alongside the additional employment land it contributes to the councils, and wider regions, supply. A sixth freestanding strategic employment site is also proposed through the allocation of a new employment site at M6 Junction 13, Dunston. A corresponding policy approach (in Policy EC2) will protect existing sources of employment, unless specific tests are met. <b><u>The scope of Policy EC1 relates to employment land falling within use classes E(g), B2 and B8 and related sui generis uses. This includes offices, research and development, industrial and logistics development.</u></b></p>	To ensure the scope of the policy is clear and is required for the plan to be effective.
MM152	MM023 Actions 58 & 60	Pg 109-111	Policy EC1: Sustainable Economic Growth	<p>Amend - Through the existing supply of available employment land <b><u>set out in Table 9 of the plan, including employment allocations contained in Policy SA5,</u></b> <del>and allocations in this plan</del> the council will ensure there is sufficient supply of employment land to meet the needs of the district over the plan period, as well as contributing towards the employment needs of our wider functional economic market area arising from the Black Country authorities. . .</p> <p>There is also support for employment development within existing <b><u>other main</u></b> employment areas <b><u>as detailed in Table 9 and identified on the policies map, and subject to the requirements of Policy EC10 in the case of Wolverhampton Halfpenny Green Airport.</u></b> <del>and</del> Support is also <b><u>provided</u></b> within the Tier 1 and Tier 2 villages, <b><u>and for small-scale</u></b></p>	The amendment ensures that Policy EC1 is consistent with the settlement hierarchy outlined in Policy DS5 and is required to ensure the policy is justified.

				<p><b>employment development in Tier 3 settlements, in line with</b> identified <del>within</del> the settlement hierarchy <b>in Policy DS5 and other policy requirements</b>, subject to other policy requirements including ensuring proposals do not have an unacceptable impact on local amenity.</p> <p>Elsewhere in the district diversification of the rural economy will be supported in line with Policy EC4, particularly where proposals would contribute towards climate change mitigation and other environmental benefits where compatible with other planning policies.</p> <p><del>Development proposals should be consistent with other Local Plan policies.</del></p>	
MM153	Action 65	Pg 112	Policy EC2: Retention of employment sites	Amend - Policy EC2: Retention of employment sites <b>and premises.</b>	To make clearer the scope of the policy, which is required for the plan to be effective.
MM024	N/A	Pg 113	Policy EC3: Employment and Skills	Amend - An Employment and Skills Plan (ESP) will be required for developments of 100 or more residential units ( <b>including new and change of use dwellings, and phases combined</b> ) or 5000sqm of commercial floorspace ( <b>including new and change of use floorspace, and extensions</b> ). For commercial developments of less than 5000sqm down to 1000sqm, applicants are required to undertake early discussions with the council's Enterprise Team to determine if an ESP is required, informed by the number of jobs the development will support.	The amendment adds clarity on the application of thresholds and ensures the policy is justified and effective.
MM154	MM025 Actions 68, 69 & 70	Pg 115	Policy EC4: Rural Economy	Amend - Rural employment proposals for employment development in locations outside development boundaries will only be supported where <b>they are in-keeping with the character and scale of the surrounding location and which promote the conversion or reuse of rural buildings.</b>	The introduction to Part 2 of the policy has been rewritten and now includes criteria 2a) & 2b). The amendment clarifies expectations

				<p><b>Proposal will only be supported where</b> all of the following criteria are satisfied:</p> <p>a) <del>It is small in scale.</del></p> <p>b) <del>It comprises the conversion and reuse of rural buildings.</del></p>	of development proposals and ensures that the requirement is effective.
MM155	Action 71	Pg 115	Policy EC4: Rural Economy	<p>Amend clause 2c) -</p> <p>The <b>applicant can demonstrate that the</b> development is not capable of being located within the development boundaries of a village, by reason of the nature of the operation or the absence of suitable sites.</p>	This amendment clarifies the requirements to justify development outside of development boundaries and ensures policy effectiveness.
MM156	Actions 72 & 74	Pg 115	Policy EC4: Rural Economy	<p>Amend clause 2d) -</p> <p>It is supported by an appropriate business case which demonstrates that the proposal will <b>be viable and will</b> support the local economy, which in turn would help sustain rural communities. <del>Additional guidance on the nature of the business case requirements will be provided through a Rural Development SPD.</del></p>	This amendment clarifies the requirements necessary to support development outside of development boundaries and ensures policy effectiveness.
MM026	N/A	Pg 115	Policy EC4: Rural Economy	<p>Amend clause 2e) –</p> <p>The development is <del>accessible by a choice of means of transport including</del> <b>exploits opportunities to make the sites' location more sustainable including maximising</b> walking, cycling and public transport</p>	The amendment adds clarity and ensures consistency with national policy.
MM157	Action 75	Pg 116	Policy EC4: Rural Economy	<p>Amend -</p> <p>Conversion and re-use of rural agricultural buildings.</p> <p><del>The sustainable re-use of rural agricultural buildings will be supported with the preference for re-use for rural employment uses.</del></p>	The amendment adds clarity and ensures the policy is justified and effective.

MM158	Action 76	Pg 116	Policy EC4: Rural Economy	Amend clause 3c) - That the building is capable of conversion without detrimental alterations affecting its character, appearance, <b>historic</b> significance, general setting and immediate surroundings.	The amendment adds clarity and retains focus on the historic significance. This is required for the policy to be justified.
MM027	N/A	Pg 116	Policy EC4: Rural Economy	Amend clause 4b) – There is no adverse impact on <del>amenity</del> or the historic environment.	The amendment adds clarity and retains focus on the historic environment. This is required for the policy to be justified.
MM159	Action 77	Pg 116	Policy EC4: Rural Economy	Amend clause 4c) - <b>Where applicable</b> <del>the</del> proposals contribute positively to the maintenance of biodiversity, climate change and food security.	The amendment adds clarity and ensures the policy is justified.
MM160	Action 78	Pg 116	Policy EC4: Rural Economy	Amend clause 4d) - The proposal makes use of existing buildings wherever possible. Where new or replacement buildings are required they are closely related to the existing group and their siting, form, scale, design and external materials are in harmony with existing <del>traditional</del> buildings.	The amendment adds clarity and ensures the policy is justified.
MM028	N/A	Pg 118	Policy EC5: Tourist Accommodation	Amend – Proposals <del>proportionate, relative to the size of the settlement</del> <b><u>should be in-keeping with the tier and scale of the village and be in character and scale with the location.</u></b>	To add clarity, it is considered that the reference to proposals being proportionate, relative to settlement size should be amended to align with the approach in Policy

					EC4. This is required for the policy to be justified.
MM163	Action 82	Pg 118	Policy EC5: Tourist Accommodation	Amend – Proposals for <del>small scale or expansion of</del> tourist accommodation outside of development boundaries, will be permitted provided that they are <b><u>limited in scale and in in-keeping with the character of the surrounding location and that</u></b> all of the following criteria are met:	The modification has replaced direct reference to small scale and has replaced this with a reference to 'limited' and a requirement that development should respect the existing character of the location within which it is situated. This amendment has added clarity to the policy wording and ensures that the application of the policy is effective.
MM029	N/A	Pg 118	Policy EC5: Tourist Accommodation	Amend clause c) – The proposal would not materially adversely affect the character, appearance and amenity of the surrounding area, <del>any heritage assets and their setting</del> and include appropriate mitigation where necessary to ensure this.	The amendment adds clarity and ensures consistency with national policy.
MM030	N/A	Pg 118	Policy EC5: Tourist Accommodation	Amend clause d) - Where applicable, proposals should <del>conserve</del> sustain and <del>where possible,</del> enhance the significance of heritage assets, including their setting.'	The amendment adds clarity and ensures consistency with national policy.
MM031	N/A	Pg 118	Policy EC5: Tourist Accommodation	Amend clause f) - The proposal <del>would not</del> <b>should seek to avoid the</b> use of the best and most versatile agricultural land.	The amendment proposes a less restrictive approach

					which would ensure consistency with national policy.
MM032	N/A	Pg 118	Policy EC5: Tourist Accommodation	Amend clause h) - h) <del>The proposal includes a high quality landscaping scheme.</del> <b><u>Where a proposal has the potential to impact on the landscape character, a high-quality landscape scheme will be required.</u></b>	The amendment adds clarity and provides greater flexibility. This is required for the policy to be justified.
MM033	N/A	Pg 118	Policy EC5: Tourist Accommodation	Add as clause i) <b><u>A business plan to ensure the long-term viability of such proposals. The business plan will be independently verified by an expert which will be paid for by the applicant.</u></b>	The amendment adds clarity, reflecting that the requirement for a business plan relates only to proposals situated outside of development boundaries. This is required to ensure the policy is justified.
MM034	N/A	Pg 118	Policy EC5: Tourist Accommodation	Add as clause j) <b><u>Where applicable the change of use from tourist accommodation to residential will not normally be permitted unless it is demonstrated that its continued use as tourist accommodation is no longer viable.</u></b>	The amendment is required to ensure consistency between Policy EC5 and Policy DS5 in that the restrictions regarding change of use from tourism accommodation will be applied to proposals outside of settlement boundaries. This is

					required to ensure the policy is justified.
MM035	N/A	Pg 118	Policy EC5: Tourist Accommodation	Add as clause k) - <b><u>Where applicable, it prioritises the conversion and reuse of rural buildings.</u></b>	The amendment is required to ensure consistency with regards to employment uses in areas outside of settlement boundaries. This is required to ensure the policy is justified.
MM244	Action 81	Pg 119	Policy EC5: Tourist Accommodation	Amend – The change of use from tourist accommodation to residential will not normally be permitted unless it is demonstrated that its continued use as tourist accommodation is no longer viable <b><u>and that the accommodation is of a fixed and permanent nature.</u></b>	The amendment adds clarity and ensures the policy is justified.
MM164	MM036 Action 84	Pg 120	Policy EC6: Rural Workers Dwellings	Amend - If a new dwelling is essential to support a new farming activity, whether on a newly-created agricultural unit or an established one, it <del>should</del> <b>must</b> be a temporary dwelling for the first three years. <b><u>All proposed N</u></b> new rural workers dwellings will only be supported where all of the following criteria are met	The amendment adds clarity on the application of the criteria within Policy EC6 and ensures the policy is effective and justified.
MM037	N/A	Pg 120	Policy EC6: Rural Workers Dwellings	Amend clause a) – There is a clearly established existing functional need <b><u>for the dwelling.</u></b>	The amendment adds clarity and ensures the policy is justified.
MM165	Action 85	Pg 120	Policy EC6: Rural Workers Dwellings	Delete clause e) – <del>e) Other planning requirements, e.g. in relation to access, or the impact on the countryside are satisfied.</del>	The amendment adds clarity and ensures the policy is justified.

MM038	N/A	Pg 120	Policy EC6: Rural Workers Dwellings	Amend - An assessment setting out <del>the need for</del> <u>how</u> the dwelling <u>complies with criteria a-d (inclusive)</u> should be submitted with any application which will be verified by an independent expert.	The amendment adds clarity on how compliance with the policy will be ascertained and ensures the policy is justified.
MM039	N/A	Pg 120	Policy EC6: Rural Workers Dwellings	Amend - Where <del>agricultural or forestry</del> <u>rural workers</u> dwellings are permitted, appropriate conditions will be used... a) The dwelling is no longer needed on that unit for the purposes of <del>agriculture or forestry</del> <u>a rural worker</u> .	The amendment adds clarity on the scope of Part 2 of Policy EC6 and provides consistency throughout which ensures the policy is justified and effective.
MM166	Action 86	Pg 120	Policy EC6: Rural Workers Dwellings	Amend – Applications to remove these conditions will not be permitted unless all of the following criteria are met, <u>as demonstrated through the planning application</u> :	The amendment clarifies how the criteria will be assessed, and ensures the policy is effective.
MM040	N/A	Pg 121, para 10.27	Equine related development	Amend - Proposals for larger scale <u>business/commercial</u> equine enterprises should be supported by...	The amendment adds clarity on which applications will be expected to conform with the requirement for a business case and is required to ensure the policy is justified.
MM041	N/A	Pg 121	Equine related development	Add as new paragraph 10.28 -	The amendment adds clarity and

		(new para after 10.27)		<b><u>The provision of adequate space for horses will help to address the issue of the excessive sub-division of fields and over grazing/loss of soil structure. While there is not a common standard applicable throughout the plan area, depending on how the horses are kept and the nature of the land, a desirable guideline would be stocking at a density of one hectare per horse in line with The British Horse Standards.</u></b>	ensures the policy is justified.
MM042	N/A	Pg 121	Policy EC7: Equine Related Development	Amend clause a) - <del>New buildings in association with</del> Equine development such as stables and field shelters . . .	The amendment adds clarity and ensures the policy is justified.
MM043	N/A	Pg 121	Policy EC7: Equine Related Development	Amend clause b) - The scale, design <b><u>(including materials)</u></b> , and external materials <b><u>lighting and boundary treatment of any new buildings or facilities</u></b> should be sympathetic to the rural character of the area in which the building(s) <b><u>they</u></b> are situated.	The amendment adds clarity around the relevant considerations for equine development and ensures the policy is justified.
MM044	N/A	Pg 121	Policy EC7: Equine Related Development	Amend clause c) - The number of stables is proportionate to the reasonable equestrian leisure needs of the applicant <b><u>considering the number of horses and size of the land</u></b> , balanced against the need to protect the countryside and character of the landscape whilst according with The British Horse Standards.	The amendment adds clarity around the relevant considerations for equine development and ensures the policy is justified.
MM167	Action 91	Pg 121	Policy EC7: Equine Related Development	Delete clause d) – <del>The proposal does not have an adverse impact on the natural environment and the integrity of designated protected sites.</del>	Criterion d is not necessary as requirement is found in other policies, its deletion ensures the policy is justified.
MM045	N/A	Pg 121	Policy EC7: Equine Related Development	Delete clause e) - <del>Any associated developments such as menages are sympathetic to the character of the area.</del>	Criteria e is no longer required and therefore its deletion

					ensures the policy is justified.
MM046	N/A	Pg 121	Policy EC7: Equine Related Development	Add as clause g) - <b><u>Adequate provision for the safety and comfort of horses in terms of land for grazing and exercising in accordance with the British Horse Standards.</u></b>	The amendment adds clarity around the relevant considerations for equine development and ensures the policy is justified.
MM168	MM047  Actions 89 & 90	Pg 121	Policy EC7: Equine Related Development	Amend - Proposals for <del>larger scale</del> <b><u>predominantly business/commercial</u></b> equine enterprises will be considered on whether they will be beneficial to the local rural economy <del>through a business case demonstrating sound financial planning and should be consistent with other local planning policies in</del> <b><u>accordance with Policy EC4, criterion 2d.</u></b>  <b><u>Horse related facilities and equine enterprises located within development boundaries as defined within this plan will be expected to conform with Policy EC4, Part 1, in addition to all of the above criteria (a-e and, where relevant, large-scale enterprises).</u></b>	The amendment adds clarity on which applications will be expected to conform with the requirement for a business case and avoids repetition with text in the penultimate paragraph. It also adds clarity around applications within settlement boundaries. This is required to ensure the policy is justified.
MM236	Action 154	Pg 122	Retail	Amend – 11.2 It is for these reasons that this plan will support new retail and town centre developments <b><u>(as defined by ‘main town centre’ uses in Annex 2: Glossary of the NPPF) and including Class E of the Town and Country Planning (Use Classes) Order (as amended)</u></b> across the district that accord with the NPPF’s ‘centres first’ approach. Furthermore, the NPPF supports the identification of a centre’s hierarchy as well as designated centres so as to require main town	The amendment is required to provide clarity on how retail and main town centres uses are to be defined. This is required to ensure

				<p>centre uses <b>(as defined by ‘main town centre’ uses in Annex 2: Glossary of the NPPF)</b> to be appropriately located. The centres hierarchy in South Staffordshire is refreshed through this Local Plan due to the need to promote a vibrant and viable centres hierarchy that is able to respond to the changing needs of local communities. As such, a centres hierarchy along with updated retail impact assessment and sequential test thresholds, have been established through the commission of a Retail Centres Study.</p> <p>11.3 Qualitative rather than quantitative improvements should be encouraged within designated centres. This will assist in ensuring the proper protection and recognition of retail facilities and services within the district, enhance their character, attractiveness, preserve their heritage conservation, and lead to the centre becoming more economically successful. This includes provision for other town centre uses, – <b>beyond retail but within the definitions set out in the supporting text at paragraph 11.2</b> – as healthy centres usually have a good mix of higher and lower order shops and a balance between provision that ensures flexibility. Expanding centres beyond their more traditional retail roles is considered a key mechanism by which to survive and flourish. This was reflected through the government’s decision to amend the Use Class Order in September 2020. Nevertheless, the retention of majority E class use will be an important element of supporting the longevity of centres, ensuring that units are occupied, and the retail function remains primal.</p>	the policy is effective.
MM237	Action 155	Pg 123	Policy EC8: Retail	Amend - Proposals should be appropriate in scale and type to the role of centres, respect their (historic) character, environment, and local distinctiveness. Proposed uses <del>will</del> <b>should</b> make a demonstrable positive contribution to the overall role and functionality of the centre by maintaining/enhancing the centre’s retail, cultural and/or community offer.	The amendment adds clarity concerning the expectations of the policy, and ensures the policy is effective.
MM238	Action 156	Pg 124	Policy EC8: Retail	Amend –	The amendment provides clarity for

				<p><u>Other <b>Main</b> Town Centre Uses</u></p> <p>Proposals that reduce the concentration of E-class uses within a centre will not be supported, unless it is demonstrated that it supports wider significant regeneration of the centre and does not impose undue dominance of non-Main Town Centre uses <b><u>through the following considerations</u></b>. Consideration will be had to <b><u>the proposal in the context of its immediate vicinity, with factors including; the total number of exiting non-E class uses</u></b>, proximity and continuance (<b><u>consecutive run of such units along a parade</u></b>) of other non-E class uses, <b><u>dominance of the proposed non-E class use (in terms of size and positioning of the unit relative to the parade)</u></b>, and the compatibility of the proposal with nearby uses. <b><u>Where any of these circumstances are likely to undermine the role, function, or vitality of the centre (excluding significant regeneration), then the application will not be supported.</u></b></p>	<p>how proposals for other uses in-centre are considered. The amendment ensures that the policy is effective.</p>
MM048	N/A	Pg 125	Policy EC8: Retail	<p>Amend clause a) –</p> <p>Proposals for hot food takeaways are expected to:</p> <p>a) not result in significant harm to the amenity of nearby residents (<b><u>through odour, noise, or litter</u></b>) or highways safety (<b><u>through impact of deliveries or customer visits</u></b>); and</p>	<p>The amendment adds clarity around the considerations for hot food takeaways and ensures the policy is justified.</p>
MM170	Action 160	Pg 127, para 11.7	Wolverhampton Halfpenny Green Airport	<p>Amend –</p> <p>The council will continue to work with the Airport owners and operators to deliver a sustainable future for the airport. The replacement of obsolete wartime buildings with new high-quality development will generally be supported, subject to being consistent with other Local Plan policies. The existing <b><u>lawful</u></b> non-aviation uses on the site <b><u>that play an important role in ensuring the viability of the airport are supported</u></b>, are accepted but the overall aim is that existing buildings should be used for aviation uses related to the General Aviation role of the airport.</p>	<p>The amendment adds clarity and ensures the policy is justified.</p>
MM171	Action 161	Pg 127	Policy EC10: Wolverhampton	<p>Amend -</p>	<p>The amendment adds clarity and</p>

			Halfpenny Green Airport	Development proposals, including the replacement of existing outdated buildings and high-quality infill development directly related to the General Aviation role of the airport and situated within the developed area of the site (as defined on the policies map) will be supported. New development unrelated to this role will not be supported. <b><u>Conversions to non-aviation use will only be supported where the building is currently in a lawful non-aviation use.</u></b>	ensures the requirement is effective.
MM172	Action 160	Pg 127	Policy EC10: Wolverhampton Halfpenny Green Airport	Amend – Development proposals, including the replacement of existing outdated buildings and high-quality infill development directly related to the General Aviation role of the airport and situated within the developed area of the site (as defined on the policies map) will be supported. New development unrelated to this role will not be supported.  <del>The council will support the continued occupation of the site by existing non-aviation businesses that play an important role in ensuring the viability of the airport.</del>  The council will resist development proposals that would have a detrimental impact on the environment and the amenity of nearby residents including the physical expansion of the site. . .	The amendment adds clarity and ensures the requirement is effective.
MM174	Action 164	Pg 129, para 11.12	Sustainable Transport	Amend – Making shorter journeys using active means of travel can contribute to reducing congestion by fewer motorised vehicles on the road, also reducing pollution and carbon emissions. In urban areas, journey times can often shorter <u>n</u> when walking or cycling as users are able to take advantage of paths not accessible to motor vehicles. <b><u>As such, opportunities to maximise sustainable transport solutions will differ between locations which are more isolated within the district compared to settlements which already benefit from, or could be integrated into, good connections (via public transport or footpaths/cycleways) to nearby urban areas.</u></b>	The additional wording adds clarity and ensures consistency with national policy, and ensures the policy is justified.

MM050	N/A	Pg 130	Policy EC12: Sustainable Transport	Add as paragraph 4 within the policy - <b><u>Development should consider the infrastructure requirements set out in the most up to date Staffordshire County Council Local Transport Plan to ensure that relevant identified sustainable transport infrastructure or measures can be accommodated as part of the proposed scheme.</u></b>	The amendment adds clarity regarding the Local Transport Plan and ensures the policy is justified.
MM051	N/A	Pg 131	Policy EC12: Sustainable Transport	Amend clause e) – <del>Adequate provision to mitigate the likely impacts (including cumulative impacts) of their proposal including environmental impacts (such as noise and pollution) and impact on amenity and health. This will be achieved through direct improvements and Section 106 contributions.</del> <b><u>Where required, appropriate mitigation to address the impacts of any increased traffic (including cumulative impacts) associated with the proposed development shall be provided, either through direct improvements or Section 106 contributions.</u></b>	The amendment adds clarity and ensures consistency with national policy.
MM052	N/A	Pg 132	Policy EC13: Broadband	Amend - <del>All <u>new residential and commercial</u> developments in South Staffordshire must...</del>	The amendment adds clarity and ensures the policy is justified.
MM053	N/A	Pg 135	Policy NB1: Protecting, Enhancing, and Expanding Natural Assets	Amend – <u>Nationally Designated Sites (SSSI and NNR)</u> <del>Development proposals which directly or indirectly cause harm to are likely to have an adverse effect on...</del>	The amendment adds clarity and ensures consistency with national policy.
MM054	Actions 171 & 172	Pg 135	Policy NB1: Protecting, Enhancing, and Expanding Natural Assets	Amend - Locally Designated Sites (SBIs, LNRs <b><u>and BASs</u></b> ).	This omission was an oversight and therefore its inclusion is required for the policy to be justified.
MM175	Action 169	Pg 136	Policy NB1: Protecting, Enhancing, and	Amend – Valued soils will be protected and enhanced, <del>including the best and most versatile agricultural land</del> , and development should not contribute to	Modification to recognise the distinction between

			Expanding Natural Assets	unacceptable levels of soil pollution. <b><u>Development proposals should seek to avoid the use of the best and most versatile agricultural land.</u></b>	soils and agricultural land. The amendment adds clarity and ensures consistency with national policy.
MM176	Action 174	Pg 137, para 12.5	Biodiversity	Amend - The Environment Bill received Royal Assent on 9 November 2021 and is now an Act of Parliament. The Act is designed to ' <i>improve air and water quality, tackle waste, increase recycling, halt the decline of species, and improve our natural environment</i> '. The Act requires that developments and projects ( <b><u>unless statutorily exempt</u></b> ) will now need to ensure there is at least a 10% net gain to biodiversity.	The amendment adds clarity and ensures consistency with national policy.
MM055	N/A	Pg 138	Policy NB2: Biodiversity	Amend para 4– All new development must also include measures to assist with halting the decline of species and to address biodiversity loss by including site-specific enhancements for species such as bat and bird boxes, hedgehog highways, planting of native floral species, and the inclusion of features beneficial for invertebrates such as sand banks, bee bricks, retaining dead wood on site, and other beneficial measures. <b><u>Bat and bird boxes must be integrated into the fabric of buildings wherever possible to ensure the longevity of the enhancements.</u></b>	The reference to more permanent structures is considered necessary to understand how the policy will be achieved and is therefore required for the policy to be justified.
MM177	Action 174	Pg 138	Policy NB2: Biodiversity	Amend - All new development ( <b><u>unless statutorily exempt</u></b> ) must provide a minimum of 10% biodiversity net gain, measured using the Secretary of State's biodiversity metric or other metric as required for the purposes of measuring biodiversity net gain in the	The amendment adds clarity and ensures consistency with national policy.
MM056	N/A	Pg 138	Policy NB2: Biodiversity	Amend clause c) – <del>Securing of the habitat in perpetuity. Where it is demonstrated that this is not possible, t</del> The habitat must be secured for at least 30 years. This will be achieved via a S106 agreement or planning conditions.	The amendment adds clarity and ensures consistency with national policy.

MM178	Action 177	Pg 139, para 12.13	Cannock Chase SAC	<p>Amend - <b><u>The evidence base encompasses a number of local authorities (Stafford Borough, Cannock Chase, South Staffordshire, East Staffordshire, Lichfield, Wolverhampton City and Walsall Borough). The Cannock Chase Special Area of Conservation Planning Evidence Base Review Stage 2 (2021) restated the ongoing validity of the 15km zone of influence as the basis for collecting contributions from new residential development to support mitigation measures to prevent harm to the SAC.</u></b> The studies also indicated that the increase in visitor numbers resulting from proposed new housing growth identified in local plans within a 15km radius of the SAC is likely to have a significant effect unless measures are taken to prevent harm. These <b>potential harmful</b> impacts include fragmentation of habitat from new paths and tracks, track and path widening through erosion, trampling and compaction and soil enrichment as a consequence of dog fouling. To address these potential impacts the SAC partnership has developed a range of mitigation measures to ensure that new residential development does not adversely affect the Cannock Chase SAC. <b>There is a standard funding approach amongst all the relevant authorities</b> to support the delivery of these management measures is derived from a per dwelling contribution paid by each net new dwelling built within the Zone of Influence. <del>The Zone of Influence is currently 15km, which is justified by the evidence base.</del> Over the plan period, the evidence base will be continually updated to ensure that the SAC is not being adversely impacted. As such, the Zone of Influence may change, and the most up to date position can be found in the separate Guidance Note.</p>	Supporting text amendment to provide a clearer context for the policy including reference to the evidence base supporting the 15km zone of influence. This amendment adds clarity and supports the policy justification.
MM179	Action 176	Pg 140	Policy NB3: Cannock Chase SAC	Amend – Mitigation can <b>will</b> be secured through developer contributions as outlined in the Guidance to Mitigation Note <b><u>unless an alternative form of mitigation is agreed with Natural England.</u></b>	The amendment adds clarity and ensures consistency with national policy.
MM057	N/A	Pg 141	Policy NB4: Landscape Character	Amend –	The amendment adds clarity and

				The intrinsic rural character and local distinctiveness of the South Staffordshire landscape should be <del>maintained</del> <b>protected</b> and where possible enhanced.	ensures consistency with national policy.
MM059	N/A	Pg 141	Policy NB4: Landscape Chapter	Amend – <del>Proposals must consider the County Council Landscape Character Assessment and Historic Landscape Characterisation in assessing their impacts upon landscape character and should also (where applicable) have regard to the findings of the latest Landscape Sensitivity Study prepared by the council.</del> <b><u>Proposals must consider ‘Planning for Landscape Change’, the Staffordshire County Council Landscape Character Assessment (or any subsequent updates), and Historic Landscape Characterisation, in assessing their impacts upon landscape character. Proposals shall (where applicable) have regard to the findings of the latest Landscape Sensitivity Study; South Staffordshire Landscape Sensitivity Assessment 2019, or any subsequent updates.</u></b>	The document titles have been updated as per information from Staffordshire County Council and is required for the policy to be justified.
MM180	MM058 Action 179	Pg 141	Policy NB4: Landscape Chapter	Amend – Throughout the district, the design and location of new development should take account of the characteristics and sensitivity of the landscape and its surroundings and <del>not have</del> <b><u>to seek to minimise any</u></b> detrimental effect on the immediate environment and on any important medium and long-distance views.	The amendment adds clarity and ensures consistency with national policy.
MM181	Action 136	Pg 144	Policy NB5: Renewable and low carbon energy generation	Under wind energy section of the policy, add as clause e) - d) The development avoids or adequately mitigates shadow, flicker, noise and any other adverse impact on amenity. <b><u>e) The development avoids or mitigates any negative effect on wildlife</u></b> <del>e) f)</del> Following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed.	To ensure that adequate consideration is given to the effects on wildlife and is required for the policy to be effective.

MM182	Action 138	Pg 145	Policy NB6A: Net zero new build residential development (operational energy)	<p>Amend - <b><u>All applications for new-build residential development must include the submission of an Energy Statement (or sufficiently detailed energy chapter within a wider sustainability statement), alongside associated output reports from energy modelling software, to demonstrate compliance with A1 – A7 below:</u></b></p> <p>A1. Overarching carbon reduction</p> <p>New residential development of 1 or more homes. . .</p>	Amendment needed for policy effectiveness to clarify that energy statement will be required to demonstrate compliance.
MM183	MM060 Action 137	Pg 146	Policy NB6A: Net zero new build residential development (operational energy)	<p>Amend clause A1 – New-<b><u>build</u></b> residential development of 1 or more homes shall achieve <b>net zero regulated and unregulated carbon emissions</b>, through the application of requirements A2 – A4 laid out below.</p> <p>The <b>regulated carbon reduction should be achieved through on-site measures</b>, unless this is demonstrated to the council’s satisfaction that it is unviable or unfeasible with reference to site-specific factors. <b><u>The remaining emissions should be offset per section A4 of this policy.</u></b> <b><u>Additionally, unregulated emissions must be offset if not mitigated on-site.</u></b></p>	The amendment adds clarity and ensures the policy is justified and effective.
MM184	Action 138	Pg 147, para 13.7	New build residential development	<p>Amend - Policy NB6A sets out the requirements for new-<b><u>build</u></b> homes’ carbon performance with seven different policy elements (A1-A7) to be addressed. <del>A1 – A7 are to be demonstrated at the planning application stage through the submission of an energy statement (or sufficiently detailed energy chapter within a wider sustainability statement), alongside associated output reports from energy modelling software.</del> Policy elements A1, A2 and A3 are to be addressed at design and post-completion stages, to ensure that the development has been built to the intended standards.</p>	Text moved into policy wording and is required for the policy to be effective.

MM061	N/A	Pg 148  (new para after 13.11)	New build residential development	Add as new paragraph 13.12 - <b><u>Under policy element A5, an assured performance method refers to a structured approach that ensures buildings achieve their predicted energy performance in reality, rather than relying solely on design-stage compliance calculations. This involves:</u></b> <ul style="list-style-type: none"> <li>•<b><u>More accurate energy modelling – Using tools like CIBSE TM54 or PHPP, which are a better predictor of actual energy use compared to SAP/SBEM.</u></b></li> <li>•<b><u>Quality assurance during construction – Implementing structured processes such as Passivhaus certification, or the NEF/GHA Assured Performance Process™ to ensure correct installation of measures.</u></b></li> <li>•<b><u>Post-construction verification – Requiring testing methods like air tightness, thermographic, and U-value testing to confirm as-built performance.</u></b></li> </ul>	The amendment adds clarity as it provides a definition for “assured performance method” and therefore ensures the policy is justified and effective.
MM185	Action 141	Pg 149	Policy NB6B: New build non-residential development (operational energy)	Amend - <u>B1. BREEAM</u>  Major <b><u>new-build</u></b> non-residential development is to <b>demonstrate compliance with the most recent applicable BREEAM Excellent standard.</b> BREEAM Outstanding should be targeted and the proposal will be afforded weight in favour where this is achieved. Maximum credits under BREEAM criteria Ene01 should be achieved.	Amendment needed for policy effectiveness to clarify it only applies to new build development.
MM186	Action 141	Pg 149	Policy NB6B: New build non-residential development (operational energy)	Amend - <u>B2. Energy efficiency</u>  New- <b><u>build</u></b> non-residential development proposals are expected to achieve a <b>15% improvement in Part L 2021 TER through energy efficiency features</b> unless demonstrated unfeasible or unviable to the satisfaction of the council with references to site-specific and/or use-class specific characteristics. Where this target is not met, applications must demonstrate that energy efficiency measures (and TER reductions from these) have been pursued to the greatest extent feasible and viable, in	Amendment needed for policy effectiveness to clarify it only applies to new build development.

				comparison to the notional standards set by Building Regulations Part L. This is to be demonstrated using the latest non-residential National Calculation Methodology (currently SBEM).	
MM187	Actions 141 & 142	Pg 149-150	Policy NB6B: New build non-residential development (operational energy)	<p>Amend - <u>B3. On-site renewable energy</u></p> <p><b><u>New-build</u></b> non-residential development must <b>demonstrate the fullest feasible and viable use incorporation of on-site renewable energy generation and/or connection</b> to local renewable and low carbon energy network, with the aim to annually match operational energy use, <b><u>where known</u></b>.</p> <p>All <b><u>new-build</u></b> non-residential buildings are <b>encouraged</b> to demonstrate that the amount of on-site renewable energy generation equates to <math>\geq 120</math> kWh/m<sup>2</sup> projected building footprint/year. Where this is fulfilled, the sustainability benefit of this will be recognised and afforded weight in favour of the proposal. Large-scale <b><u>new-build</u></b> development (5000m<sup>2</sup> non-residential floorspace or more) should demonstrate that opportunities for on-site renewable energy infrastructure (on-site but not on or attached to individual buildings), such as solar PV canopies on car parks, have been explored.</p> <p>In <b><u>new-build</u></b> developments, the use of fossil fuels and connection to the gas grid will not be considered acceptable.</p>	Amendment needed for policy effectiveness to clarify it only applies to new build development.
MM188	Action 141	Pg 150	Policy NB6B: New build non-residential development (operational energy)	<p>Amend - <u>B6. Post-occupancy evaluation</u></p> <p>Large-scale <b><u>new-build</u></b> development (5,000m<sup>2</sup> floor space or more) should monitor and report total energy use and renewable energy generation values on an annual basis for 5 years from first occupation. An outline plan for the implementation of this should be submitted with the application. Monitored data are to be reported to the local planning authority.</p>	Amendment needed for policy effectiveness to clarify it only applies to new build development.
MM189	MM062	Pg 151	Policy NB6C: Embodied	Amend - <u>C2. Limiting embodied carbon</u>	The amendment adds clarity and

	Actions 143 & 144		Carbon and Waste	<p>Large-scale new-<b>build</b> residential (50 and above units) and non-residential (5000m<sup>2</sup> commercial floorspace) development <u>is</u> to limit embodied carbon (RICS modules A1 – A5) to 550 kgCO<sub>2</sub>/m<sup>2</sup> GIA.</p> <p><b><u>Where developments face unavoidable site-specific constraints that impact embodied carbon performance (e.g., heritage conservation, structural stability, or ground conditions), the whole-life carbon assessment should justify this, alongside measures taken to minimise emissions through design, material selection, or offsetting strategies.</u></b></p>	ensures the policy is justified.
MM190	Action 146	Pg 151	Policy NB6C: Embodied Carbon and Waste	<p>Amend - <u>C4. Demolition audits</u></p> <p>All major development that contains existing buildings/structures to carry out a pre-redevelopment and/or pre-demolition audit, following a well-established industry best practice method (e.g. BRE), <b><u>to be agreed with the council in advance of application submission.</u></b></p>	Amendment needed for policy effectiveness to provide clarity on implementation.
MM191	Action 145	Pg 152 (new para after 13.15)	Embodied Carbon	<p>Add as new paragraph 13.16 - <b><u>C3 seeks to ensure that reuse of building materials in the future is considered as an integral part of the design process for new development. Developers should design buildings in a way that make them easy to dismantle. This results in less waste, fewer demolitions and more recycling of building components when the building eventually reaches the end of its life.</u></b></p>	The amendment adds clarity and ensures policy is justified.
MM065	N/A	Pg 153 - 155	Policy NB7: Managing Flood Risk, Sustainable urban Drainage Systems (SuDS) and Water Quality	<p>Amend –</p> <p>1. Managing flood risk</p> <p>All more Vulnerable and Highly Vulnerable development within Flood Zone 2 and 3 <del>should</del> <b><u>will</u></b> set finished floor levels 600mm above the known or modelled at 1% and 3.3% annual exceedance probability (AEP) flood level, including an allowance for climate change in accordance with the latest national guidance. All new development in Flood Zones 2 and 3 <del>should</del> <b><u>shall</u></b> not adversely affect flood routing or result in a net loss of flood storage capacity that would increase flood risk elsewhere.</p>	The amendment adds clarity by strengthening the policy requirement, this is required for the policy to be justified and effective.

			<p>For developments located in areas at risk of fluvial flooding, safe access/egress must be provided in the form of a safe dry route for people as a minimum and vehicles <del>wherever possible</del>.</p> <p>Developments should, where possible naturalise urban watercourses (by reinstating a natural, sinuous river channel and restoring the functional floodplain) and open up underground culverts, to provide biodiversity net gain as well as amenity improvements. Development <del>should</del> <b>shall</b> not take place over or within 8m of culverted watercourses.</p> <p>Where it is not always possible to direct development to sites with the lowest probability of flooding, the development <del>should</del> <b>shall</b> seek to minimise risk to the site and make the development resistant to any residual risk and make the development flood resilient. Opportunities <del>should</del> <b>shall</b> also be sought to reduce the overall level of flood risk through the layout and form of development. Development <del>should</del> <b>must</b> be designed to be safe throughout its lifetime, taking account of the potential impacts of climate change. Provision for emergency access and egress must also be included. . .</p> <p>For all developments (excluding minor developments and change of use) proposed in Flood Zone 2 or 3, a Flood Warning and Evacuation Plan <del>should</del> <b>must</b> be prepared.</p> <p>2. Sustainable urban Drainage Systems (SuDS) SuDS design <del>should</del> <b>shall</b> be an integral part of the design and clear details of proposed SuDS together with how they will be managed and maintained will be required as part of any planning application.</p> <p>Only proposals which clearly demonstrate that a satisfactory SuDS layout with appropriate maintenance is possible, or compelling justification as to why SuDS should not be incorporated into a scheme, or are unviable, are likely to be successful. SuDS systems <del>should</del> <b>shall</b> be designed to ensure</p>	
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				<p>that it can be accessed for maintenance and operation requirements and that ongoing maintenance costs are economically proportionate. . .</p> <p>3. Water quality Development <del>should</del> <b>must</b> not adversely affect the quality or quantity of water, either directly through pollution of surface or ground water, or indirectly through the treatments of wastewater.</p>	
MM066	N/A	Pg 155	Policy NB7: Managing Flood Risk, Sustainable urban Drainage Systems (SuDS) and Water Quality	Amend – Discharge <del>should</del> <b>must</b> not be made into the combined sewer system and early engagement by the developer with Severn Trent Water Ltd will be required to ensure sustainably drained development.	The amendment adds clarity by strengthening the policy requirement, this is required for the policy to be justified and effective.
MM192	Action 127	Pg 157, para 14.1	Protection and enhancement of the historic environment and heritage assets	Amend – Reference to heritage assets includes both designated and non-designated assets. <b><u>Designated assets receive statutory protection and include Listed Buildings, Scheduled Monuments, Conservation Areas and Registered Parks and Gardens. Non-designated sites are heritage assets which are identified by the Local Authority and included on a local list. Whilst they lack formal statutory protection, their significance is a material consideration in the planning process.</u></b>	The amendment adds clarity and ensures consistency with national policy.
MM067	N/A	Pg 157	Policy NB8: Protection and enhancement of the historic environment and heritage assets	Amend – The historic environment will be conserved and enhanced, and heritage assets will be protected in a manner appropriate to their significance. Development proposals should demonstrate how they conserve or enhance the character, appearance and function of heritage assets and their settings and respect the significance of the historic environment <b><u>heritage assets, including their setting, character, appearance and function.</u></b>	The amendment adds clarity and ensures consistency with national policy.

MM069	N/A	Pg 158	Policy NB8: Protection and enhancement of the historic environment and heritage assets	Amend – Development proposals which would cause harm to, <b>or loss of</b> , the significance of a heritage asset, or its setting, will not be permitted without a clear justification in accordance with legislation and national policy.	The amendment adds clarity and ensures consistency with national policy.
MM070	Action 132	Pg 158	Policy NB8: Protection and enhancement of the historic environment and heritage assets	Amend – The council will support measures which secure the improved maintenance, management and sustainable <b>and appropriate</b> reuse of heritage assets ( <del>where appropriate</del> ), particularly those which are identified nationally or locally as being at risk.	The amendment adds clarity and ensures the policy is justified.
MM239	Action 182	Pg 162 (new section after para 15.3)	Supporting text for Policy PR1: Review of the Local Plan	<p>Add in following heading and paragraphs, starting from new paragraph 15.4 –</p> <p><b><u>Review of the Local Plan</u></b></p> <p><b><u>Inevitably the process of plan making means that matters arise during later stages of the preparation of a draft plan, which are best addressed as part of a future plan review.</u></b></p> <p><b><u>Government revisions to the NPPF (December 2024) increased South Staffordshire’s housing need from 227 to 651 dwellings per year, while this plan provides for 262. As this is below 80% of the revised figure, the Council is required to prepare a new Local Plan under the Levelling Up and Regeneration Act (LURA) 2023 system.</u></b></p> <p><b><u>South Staffordshire Council will monitor the effectiveness of Local Plan policies annually, in line with the framework in Appendix I. The council will begin preparing a new Local Plan in accordance with the new plan making requirements of the LURA 2023. The updated or replacement Local Plan is to be submitted for examination by 31<sup>st</sup> October 2028. If the relevant regulations relating to the new plan-making system under LURA</u></b></p>	Plan review policy is needed to provide certainty on the Council’s commitment to plan-making under the LURA 2023, and for this Local Plan to be consistent with national policy and effective.

			<p><u>2023 are not in force by 30<sup>th</sup> June 2026, the council will review this Local Plan under the Planning and Compulsory Purchase Act 2004, to commence upon adoption of this Local Plan.</u></p> <p><u>One issue for the review will be accommodating large scale logistics/industrial development. A further iteration of the West Midlands Strategic Employment Sites Study was published in August 2024. Commissioned jointly by South Staffordshire Council and several other authorities in the West Midlands, the WMSESS 2024 confirmed a need for strategic scale industrial and logistics employment land and identified two opportunity areas, partially located within the district of South Staffordshire, around junctions along the M6 and M54. As this evidence was published at a late stage of plan preparation (after Regulation 19 stage), it was deemed most appropriate for it to be considered as part of the next Local Plan. This is a position agreed with neighbouring authorities, through the Black Country FEMA Statement of Common Ground (Position at January 2025). The recommendations of the WMSESS 2024 (or subsequent updates) will therefore be considered through a review of this Local Plan.</u></p> <p><u>The review will also need to consider the implications of any other relevant projects, such as improvements to the strategic road and public transport network and active travel corridors, including the M54/M6 link road<sup>3</sup> and The Central Edge<sup>4</sup> inward investment prospectus, when considering opportunities for large scale sub regional employment land.</u></p> <p><u>The individual combined effect of these matters upon plan making, including making appropriate provision for large-scale sub-regional commercial development, is a matter which will necessarily be addressed through a plan review in the context of a green belt assessment.</u></p>	
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MM240	Action 182	Pg 162	Policy PR1: Review of the Local Plan	<p>Following the supporting text (MM239), add in plan review policy – <b><u>Policy PR1: Review of the Local Plan</u></b></p> <p><b><u>The new Local Plan, or review, will address, at minimum, the following strategic matters:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>Meeting South Staffordshire’s full housing needs, including appropriate provision for Gypsies, Travellers, and Travelling Showpeople.</u></b></li> <li>• <b><u>Assessing the District’s role in accommodating unmet cross-boundary housing needs, informed by the Strategic Growth Study 2025 (or updates).</u></b></li> <li>• <b><u>Providing sufficient employment land to support local economic growth.</u></b></li> <li>• <b><u>Considering the District’s contribution to sub-regional employment development, informed by the West Midlands Strategic Employment Sites Study 2024 (or updates).</u></b></li> </ul> <p><b><u>These matters will be informed by robust, up-to-date evidence, including development needs assessments and a comprehensive Green Belt Assessment.</u></b></p>	Plan review policy is needed to provide certainty on the Council’s commitment to plan-making under the LURA 2023, and for this Local Plan to be consistent with national policy and effective.
MM194	Action IL09	Pg 167	Appendix B: Strategic master planning location proformas (Site 420, 584 & 010)	Amend site boundary to incorporate the geographic extent of the community park and denote this in a different colour or through cross-hatching on the relevant site proforma map.	Amend the plan within the site proforma to reflect the land for the community park is within the boundary of the wider site.
MM241	Action IL09	Pg 167	Appendix B: Strategic master	Amend – Site area: 51ha ( <b><u>excluding community park</u></b> )	Adds clarity to ensure effectiveness.

			planning location proformas (Site 420, 584 & 010)		
MM242	Action 24	Pg 167	Appendix B: Strategic master planning location proformas (Site 420, 584 & 010)	Amend site boundary to exclude the access track.	Adds clarity on the site boundary to ensure it is effective.
MM195	Action IL12	Pg 170	Appendix C: Housing allocation maps and proformas (Site 224)	Amend site boundary to reflect that part of the site will be used to deliver green infrastructure. This section will be marked as Green Infrastructure and remain outside of the development boundary and in the Green Belt.	Amend the plan within the site proforma to reflect the land for Green Belt compensatory measures from the site to be developed for housing. Required in the interests of effectiveness.
MM196	Action 30	Pg 170	Appendix C: Housing allocation maps and proformas (Site 224)	Amend – Site area: <del>4ha</del> <b>3.4ha</b>	Amended to reflect new site size. The amendment adds clarity and ensures the policy is justified.
MM197	Actions 8 & IL12	Pg 170	Appendix C: Housing allocation maps and proformas (Site 224)	Amend – Key requirements: <del>Any historic environment mitigation for the site, as identified in the council's Historic Environment Site Assessment Stage 2 (2022), including retention and enhancement of tree and hedgerow boundaries and additional planting to mitigate harm to the Conservation Area and protect existing historic character. In particular, the north-western border of the</del>	The amendment adds clarity and ensures the requirement is effective.

				<p>site should be retained and strengthened to clearly denote the former landscape and current parkland area</p> <p><b><u>Undertake any necessary assessments, mitigation and/or enhancement requirements relating to impact on the historic environment, as identified in the relevant site assessment proforma (sections E, F, G) in the HESA 2022, in consultation with the council's conservation officer.</u></b></p>	
MM198	Action 120	Pg 170	Appendix C: Housing allocation maps and proformas (Site 224)	<p>Add as new bullet point –</p> <p>Key requirements:</p> <p><b><u>To deliver off-site green infrastructure on the area identified on the policies map, in addition to on-site open space requirements</u></b></p>	The amendment ensures the requirement is effective.
MM199	Action 8	Pg 173	Appendix C: Housing allocation maps and proformas (Site 419a&b)	<p>Amend –</p> <p>Key requirements:</p> <p><del>Any historic environment mitigation for the site, as identified in the council's Historic Environment Site Assessment Stage 2 (2022), including retention and enhancement of tree and hedgerow boundaries bordering the site and any mitigation required as a result of archaeological investigations</del></p> <p><b><u>Undertake any necessary assessments, mitigation and/or enhancement requirements relating to impact on the historic environment, as identified in the relevant site assessment proforma (sections E, F, G) in the HESA 2022, in consultation with the council's conservation officer.</u></b></p>	The amendment adds clarity and ensures the requirement is effective.
MM200	Action 8	Pg 177	Appendix C: Housing allocation maps and proformas (Site 119a)	<p>Amend –</p> <p>Key requirements:</p> <p><del>Any historic environment mitigation for the site, as identified in the council's Historic Environment Site Assessment Stage 2 (2022), including retention and enhancement of tree and hedgerow boundaries bordering the site and any mitigation required as a result of archaeological investigations</del></p>	The amendment adds clarity and ensures the requirement is effective.

				<b><u>Undertake any necessary assessments, mitigation and/or enhancement requirements relating to impact on the historic environment, as identified in the relevant site assessment proforma (sections E, F, G) in the HESA 2022, in consultation with the council's conservation officer.</u></b>	
MM201	MM072 Action 8	Pg 178	Appendix C: Housing allocation maps and proformas (Site 523)	Add to 'Key Requirements' as third bullet point – <b><u>Undertake any necessary assessments, mitigation and/or enhancement requirements relating to impact on the historic environment, as identified in the relevant site assessment proforma (sections E, F, G) in the HESA 2022, in consultation with the council's conservation officer.</u></b>	The amendment adds clarity and ensures the requirement is effective.
MM202	Action 32	Pg 180-181	Appendix C: Housing allocation maps and proformas (Site 141)	Remove proforma.	Site has full planning permission and should be counted as a commitment rather than an allocation – for clarity. Required so the Plan is justified.
MM203	Action 33	Pg 182	Appendix C: Housing allocation maps and proformas (Site 136)	Proforma map: Remove built-out portion of the site from the allocation.	Remove built-out portion of the site of 50 dwellings (consented in 2021) from allocation for clarity. Required so the Plan is justified.
MM204	Action 120	Pg 182 - 183	Appendix C: Housing allocation maps and proformas (Site 136)	Amend – Key requirements: To deliver an off-site country park and land for allotments on the adjacent land parcels on the policies map identified as green infrastructure, including display board highlighting the sites mining heritage, <b><u>in addition to on-site open space requirements.</u></b>	The amendment adds clarity and ensures the requirement is effective.
MM205	Actions 33 & 8	Pg 182 - 183	Appendix C: Housing allocation maps	Amend – Minimum capacity: <del>50 dwellings consented on allocated site (21/00631/FUL)</del> alongside minimum 109 dwellings on safeguarded land	Remove built-out portion of the site of 50 dwellings

			and proformas (Site 136)	<p>Key requirements:  <del>Any historic environment mitigation for the site, as identified in the council's Historic Environment Site Assessment Stage 2 (2022), including any mitigation required as a result of archaeological investigations</del></p> <p><b><u>Undertake any necessary assessments, mitigation and/or enhancement requirements relating to impact on the historic environment, as identified in the relevant site assessment proforma (sections E, F, G) in the HESA 2022, in consultation with the council's conservation officer.</u></b></p>	<p>(consented in 2021) from allocation for clarity.</p> <p>The amendment adds clarity and ensures the requirement is effective.</p>
MM206	Action 8	Pg 185	Appendix C: Housing allocation maps and proformas (Site 139)	<p>Amend –</p> <p>Key requirements:  <del>Any historic environment mitigation for the site, as identified in the council's Historic Environment Site Assessment Stage 2 (2022), including retaining and enhancing tree and hedgerow planting as far as possible throughout the site and delivering any mitigation required as a result of archaeological investigations.</del></p> <p><b><u>Undertake any necessary assessments, mitigation and/or enhancement requirements relating to impact on the historic environment, as identified in the relevant site assessment proforma (sections E, F, G) in the HESA 2022, in consultation with the council's conservation officer.</u></b></p>	<p>The amendment adds clarity and ensures the requirement is effective.</p>
MM207	Action 8	Pg 186	Appendix C: Housing allocation maps and proformas (Site 704)	<p>Amend –</p> <p>Key requirements:  <del>Any historic environment mitigation for the site, as identified in the council's Historic Environment Site Assessment Stage 2 (2022), including any mitigation required as a result of archaeological investigations.</del></p> <p><b><u>Undertake any necessary assessments, mitigation and/or enhancement requirements relating to impact on the historic environment, as identified in the relevant site assessment proforma (sections E, F, G) in the HESA 2022, in consultation with the council's conservation officer.</u></b></p>	<p>The amendment adds clarity and ensures the requirement is effective.</p>

MM208	Action 8	Pg 188	Appendix C: Housing allocation maps and proformas (Site 730)	<p>Amend – Key requirements: <del>Any historic environment mitigation for the site, as identified in the council's Historic Environment Site Assessment Stage 2 (2022), including any mitigation required as a result of archaeological investigations</del></p> <p><b><u>Undertake any necessary assessments, mitigation and/or enhancement requirements relating to impact on the historic environment, as identified in the relevant site assessment proforma (sections E, F, G) in the HESA 2022, in consultation with the council's conservation officer.</u></b></p>	The amendment adds clarity and ensures the requirement is effective.
MM209	MM073 Action 8	Pg 190	Appendix C: Housing allocation maps and proformas (Site 536a)	<p>Amend – Key requirements: <del>Any historic environment mitigation for the site, as identified in the council's Historic Environment Site Assessment Stage 2 (2022), including retention and enhancement of tree and hedgerow boundaries bordering the site and any mitigation required as a result of archaeological investigations.</del></p> <p><b><u>Undertake any necessary assessments, mitigation and/or enhancement requirements relating to impact on the historic environment, as identified in the relevant site assessment proforma (sections E, F, G) in the HESA 2022, in consultation with the council's conservation officer.</u></b></p>	The amendment adds clarity and ensures the requirement is effective.
MM210	Action 8	Pg 192	Appendix C: Housing allocation maps and proformas (Site 638)	<p>Amend – Key requirements: <del>Any historic environment mitigation for the site, as identified in the council's Historic Environment Site Assessment Stage 2 (2022), including retention and enhancement of tree and hedgerow boundaries bordering the site and any mitigation required as a result of archaeological investigations</del></p> <p><b><u>Undertake any necessary assessments, mitigation and/or enhancement requirements relating to impact on the historic environment, as</u></b></p>	The amendment adds clarity and ensures the requirement is effective.

				<b><u>identified in the relevant site assessment proforma (sections E, F, G) in the HESA 2022, in consultation with the council's conservation officer.</u></b>	
MM211	Action 8	Pg 195	Appendix C: Housing allocation maps and proformas (Site 005)	Amend – Key requirements: <del>Any historic environment mitigation for the site, as identified in the council's Historic Environment Site Assessment Stage 2 (2022), including retention and enhancement of tree and hedgerow boundaries, a buffer of additional planting along the north-western boundary to protect the existing character of the Canal Conservation Area and any mitigation required as a result of archaeological investigations</del>  <b><u>Undertake any necessary assessments, mitigation and/or enhancement requirements relating to impact on the historic environment, as identified in the relevant site assessment proforma (sections E, F, G) in the HESA 2022, in consultation with the council's conservation officer.</u></b>	The amendment adds clarity and ensures the requirement is effective.
MM212	Action 8	Pg 197	Appendix C: Housing allocation maps and proformas (Site 006)	Amend – Key requirements: <del>Any historic environment mitigation for the site, as identified in the council's Historic Environment Site Assessment Stage 2 (2022), including retention and enhancement of tree and hedgerow boundaries, reinforcement of planting on the site's southern and eastern boundaries and consideration of setbacks to limit visibility from the towpath. Consider opportunities for pedestrian connections onto the towpath from the northern and southern end of the site and deliver any mitigation required as a result of archaeological investigations</del>  <b><u>Undertake any necessary assessments, mitigation and/or enhancement requirements relating to impact on the historic environment, as identified in the relevant site assessment proforma (sections E, F, G) in the HESA 2022, in consultation with the council's conservation officer.</u></b>	The amendment adds clarity and ensures the requirement is effective.
MM213	Action 8	Pg 200	Appendix C: Housing allocation maps	Amend – Key requirements:	The amendment adds clarity and ensures the

			and proformas (Site 617)	<p>Any historic environment mitigation for the site, as identified in the council's Historic Environment Site Assessment Stage 2 (2022), including retention and enhancement of tree and hedgerow boundaries bordering the site and any mitigation required as a result of archaeological investigations</p> <p><b><u>Undertake any necessary assessments, mitigation and/or enhancement requirements relating to impact on the historic environment, as identified in the relevant site assessment proforma (sections E, F, G) in the HESA 2022, in consultation with the council's conservation officer.</u></b></p>	requirement is effective.
MM214	Action 8	Pg 203	Appendix C: Housing allocation maps and proformas (Site 016)	<p>Amend –</p> <p>Key requirements:</p> <p>Any historic environment mitigation for the site as identified in the council's Historic Environment Site Assessment Stage 2 (2022), including retention and enhancement of tree and hedgerow boundaries bordering the site to conserve the setting of the Grade II listed farmhouse and any mitigation required as a result of archaeological investigations</p> <p><b><u>Undertake any necessary assessments, mitigation and/or enhancement requirements relating to impact on the historic environment, as identified in the relevant site assessment proforma (sections E, F, G) in the HESA 2022, in consultation with the council's conservation officer.</u></b></p>	The amendment adds clarity and ensures the requirement is effective.
MM215	Action 8	Pg 206	Appendix C: Housing allocation maps and proformas (Site 274)	<p>Amend –</p> <p>Key requirements:</p> <p>Any historic environment mitigation for the site, as identified in the council's Historic Environment Site Assessment Stage 2 (2022), including maintaining key views of Kinver Edge and Holy Austin Rock from the north-east corner of the site adjacent to White Hill and any mitigation required as a result of archaeological investigations</p> <p><b><u>Undertake any necessary assessments, mitigation and/or enhancement requirements relating to impact on the historic environment, as</u></b></p>	The amendment adds clarity and ensures the requirement is effective.

				<b><u>identified in the relevant site assessment proforma (sections E, F, G) in the HESA 2022, in consultation with the council's conservation officer.</u></b>	
MM216	Action 8	Pg 209	Appendix C: Housing allocation maps and proformas (Site 239)	Amend – Key requirements: <del>Any historic environment mitigation for the site, as identified in the council's Historic Environment Site Assessment Stage 2 (2022), including mitigation required as a result of archaeological investigations</del>  <b><u>Undertake any necessary assessments, mitigation and/or enhancement requirements relating to impact on the historic environment, as identified in the relevant site assessment proforma (sections E, F, G) in the HESA 2022, in consultation with the council's conservation officer.</u></b>	The amendment adds clarity and ensures the requirement is effective.
MM074	N/A	Pg 210	Appendix C: Housing allocation maps and proformas (Site 239)	Amend – Provide vehicular and pedestrian access via <del>Wrottesley Park Road</del> into neighbouring allocated site <b><u>to the south.</u></b>	The site details have been amended in line with emerging site-specific evidence. This is required for the policy to be justified.
MM217	Action 8	Pg 212	Appendix C: Housing allocation maps and proformas (Site 416)	Amend – Key requirements: <del>Any historic environment mitigation for the site, as identified in the council's Historic Environment Site Assessment Stage 2 (2022), including retaining and enhancing tree and hedgerow planting as far as possible throughout the site and designing the development to protect the character of the Canal Conservation Area and the Listed Buildings and Structures which sit along it. Also deliver any mitigation required as a result of archaeological investigations</del>  <b><u>Undertake any necessary assessments, mitigation and/or enhancement requirements relating to impact on the historic environment, as identified in the relevant site assessment proforma (sections E, F, G) in the HESA 2022, in consultation with the council's conservation officer.</u></b>	The amendment adds clarity and ensures the requirement is effective.

MM075	Action 38  *no cover note for Action 38	Pg 214	Appendix C: Housing allocation maps and proformas (Site 285)	Amend – Provide <del>highway</del> and pedestrian connectivity to site 459	The site details have been amended in line with emerging site-specific evidence. This is required for the policy to be justified.
MM218	Action 8	Pg 214	Appendix C: Housing allocation maps and proformas (Site 285)	Amend – Key requirements: <del>Any historic environment mitigation for the site, as identified in the council's Historic Environment Site Assessment Stage 2 (2022), including retention and enhancement of tree and hedgerow boundaries bordering the site and any mitigation required as a result of archaeological investigations.</del>  <b><u>Undertake any necessary assessments, mitigation and/or enhancement requirements relating to impact on the historic environment, as identified in the relevant site assessment proforma (sections E, F, G) in the HESA 2022, in consultation with the council's conservation officer.</u></b>	The amendment adds clarity and ensures the requirement is effective.
MM219	Action 8	Pg 216	Appendix C: Housing allocation maps and proformas (Site 562/415)	Amend – Key requirements: <del>Any historic environment mitigation for the site, as identified in the council's Historic Environment Site Assessment Stage 2 (2022), including retention and enhancement of tree and hedgerow boundaries bordering the site and any mitigation required as a result of archaeological investigations</del>  <b><u>Undertake any necessary assessments, mitigation and/or enhancement requirements relating to impact on the historic environment, as identified in the relevant site assessment proforma (sections E, F, G) in the HESA 2022, in consultation with the council's conservation officer.</u></b>	The amendment adds clarity and ensures the requirement is effective.
MM076	N/A	Pg 218	Appendix C: Housing	Amend - Minimum capacity: <del>97</del> <b>65 dwellings</b>	The capacity has been reduced due to

			allocation maps and proformas (Site 459)		the presence of electricity pylons and associated easements. This is required for the minimum capacity to be justified.
MM077	Action 38  *no cover note for Action 38	Pg 218	Appendix C: Housing allocation maps and proformas (Site 459)	Amend – Provide highway and pedestrian connectivity to site 285	The site details have been amended in line with emerging site-specific evidence. This is required for the policy to be justified.
MM220	Action 8	Pg 218-219	Appendix C: Housing allocation maps and proformas (Site 459)	Amend – Key requirements: <del>Any historic environment mitigation for the site, as identified in the council's Historic Environment Site Assessment Stage 2 (2022), including retention and enhancement of tree and hedgerow boundaries bordering the site and any mitigation required as a result of archaeological investigations.</del>  <b><u>Undertake any necessary assessments, mitigation and/or enhancement requirements relating to impact on the historic environment, as identified in the relevant site assessment proforma (sections E, F, G) in the HESA 2022, in consultation with the council's conservation officer.</u></b>	The amendment adds clarity and ensures the requirement is effective.
MM078	N/A	Pg 219	Appendix C: Housing allocation maps and proformas (Site 459)	Add to 'Key Requirements' as fourth bullet point – <b><u>The presence of high voltage overhead lines across the site will need to be retained and incorporated into any development.</u></b>	The site details have been amended in line with emerging site-specific evidence. This is required for the policy to be justified.

MM221	Action IL13	Pg 221	Appendix C: Housing allocation maps and proformas (Site 082)	Proforma map: Show access once it has been secured through the Parish Council.	Amend the site proforma to show the access to the site once it has been secured. Required so the Plan is justified.
MM243	n/a	Pg 221	Appendix C: Housing allocation maps and proformas (Site 082)	Amend – Key requirements: <del>Provision to be made for replacement playing field land to ensure development results in no net loss of pitch provision</del>  <b><u>Relocation/reprovision of the existing playing pitches and equipped play facilities within the existing sports field to facilitate vehicular access to the site</u></b>	The amendment provides clarity on what faculties need to be relocated/reprovided to facilitate site access. This is needed for the allocation to be justified.
MM222	Action 8	Pg 221	Appendix C: Housing allocation maps and proformas (Site 082)	Amend – Key requirements: <del>Any historic environment mitigation for the site, as identified in the council's Historic Environment Site Assessment Stage 2 (2022), including retention and enhancement of tree and hedgerow boundaries bordering the site to protect the historic landscape character and setting of heritage assets and any mitigation required as a result of archaeological investigations</del>  <b><u>Undertake any necessary assessments, mitigation and/or enhancement requirements relating to impact on the historic environment, as identified in the relevant site assessment proforma (sections E, F, G) in the HESA 2022, in consultation with the council's conservation officer.</u></b>	The amendment adds clarity and ensures the requirement is effective.
MM223	Action 8	Pg 224	Appendix C: Housing allocation maps	Amend – Key requirements:	The amendment adds clarity and ensures the

			and proformas (Site 397)	<p><del>Any historic environment mitigation for the site, as identified in the council's Historic Environment Site Assessment Stage 2 (2022), including any mitigation required as a result of archaeological investigations.</del></p> <p><b><u>Undertake any necessary assessments, mitigation and/or enhancement requirements relating to impact on the historic environment, as identified in the relevant site assessment proforma (sections E, F, G) in the HESA 2022, in consultation with the council's conservation officer.</u></b></p>	requirement is effective.
MM079	N/A	Pg 227	Appendix C: Housing allocation maps and proformas (Site 251)	Amend – Minimum capacity: <del>17</del> <b><u>15 dwellings</u></b>	The capacity and site area have been amended in line with site-specific evidence. This is required for the minimum capacity to be justified.
MM080	N/A	Pg 227	Appendix C: Housing allocation maps and proformas (Site 251)	Amend – Site area: <del>0.8ha</del> <b><u>0.7ha</u></b>	The capacity and site area have been amended in line with site-specific evidence. This is required for the minimum capacity to be justified.
MM224	Action 8	Pg 227	Appendix C: Housing allocation maps and proformas (Site 251)	Amend – Key requirements: <del>Any historic environment mitigation for the site, as identified in the council's Historic Environment Site Assessment Stage 2 (2022), including retention and enhancement of tree and hedgerow boundaries bordering the site and any mitigation required as a result of archaeological investigations. Provide additional planting to enhance historic environment</del>	The amendment adds clarity and ensures the requirement is effective.

				<b><u>Undertake any necessary assessments, mitigation and/or enhancement requirements relating to impact on the historic environment, as identified in the relevant site assessment proforma (sections E, F, G) in the HESA 2022, in consultation with the council's conservation officer.</u></b>	
MM225	Action 8	Pg 233	Appendix C: Housing allocation maps and proformas (Site 379)	<p>Amend – Key requirements: Any mitigation required as a result of archaeological investigations as identified in the council's Historic Environment Site Assessment Stage 2 (2022).</p> <p>The hedge boundaries on the site should be retained as far as possible in line with the HESA –stage 2 (2022) requirements as they contribute positively to its local distinctiveness and in historic environment terms, reflect its former pastoral identity</p> <p><b><u>Undertake any necessary assessments, mitigation and/or enhancement requirements relating to impact on the historic environment, as identified in the relevant site assessment proforma (sections E, F, G) in the HESA 2022, in consultation with the council's conservation officer.</u></b></p>	The amendment adds clarity and ensures the requirement is effective.
MM226	Action 8	Pg 235	Appendix C: Housing allocation maps and proformas (Site 036c)	<p>Amend – Key requirements: Any mitigation required in the council's Historic Environment Site Assessment Stage 2 (2022), including requirements regarding archaeological investigations, trees and hedgerows and the need for development to avoid higher elevations to the south of the site's southern border</p> <p><b><u>Undertake any necessary assessments, mitigation and/or enhancement requirements relating to impact on the historic environment, as identified in the relevant site assessment proforma (sections E, F, G) in the HESA 2022, in consultation with the council's conservation officer.</u></b></p>	The amendment adds clarity and ensures the requirement is effective.
MM227	Action 8	Pg 240	Appendix D:	<p>Amend – Key requirements:</p>	The amendment adds clarity and

			Gypsy and Traveller allocation maps and proformas (Site GT08)	<p>A hedged boundary should be established along the canal bank to shield the site from the Canal Conservation Area in line with the HESA – stage 2 (2022) recommendations for the site. Additionally, the hedge boundary to the south of the site should be retained and enhanced.</p> <p><b><u>Undertake any necessary assessments, mitigation and/or enhancement requirements relating to impact on the historic environment, as identified in the relevant site assessment proforma (sections E, F, G) in the HESA 2022, in consultation with the council’s conservation officer.</u></b></p>	ensures the requirement is effective.				
MM228	Action 8	Pg 244	Appendix D: Gypsy and Traveller allocation maps and proformas (Site GT23)	<p>Amend –</p> <p>Key requirements: Retain and reinforce existing tree and hedge boundaries, particularly to the west and south of the site, to protect the character of the Canal Conservation Area and other historic assets in line with the HESA – stage 2 (2022) recommendations for the site</p> <p><b><u>Undertake any necessary assessments, mitigation and/or enhancement requirements relating to impact on the historic environment, as identified in the relevant site assessment proforma (sections E, F, G) in the HESA 2022, in consultation with the council’s conservation officer.</u></b></p>	The amendment adds clarity and ensures the requirement is effective.				
MM229	Action 99	Pg 246	Appendix E: Employment proforma (Site E18)	<p>Amend -</p> <table border="1"> <tr> <td>Site access requirements</td> <td>Access utilising road permitted through previous outline consent (20/01131/OUT).</td> </tr> <tr> <td><b><u>Key requirements</u></b></td> <td> <ul style="list-style-type: none"> <li><b><u>Drainage infrastructure and strategic landscaping, including retention of existing ponds to the north west of the site and a green corridor along the stream to the north of the site.</u></b></li> <li><b><u>Undertake any necessary assessments, mitigation and/or enhancement requirements relating to impact on the historic environment, as identified in the relevant site assessment proforma</u></b></li> </ul> </td> </tr> </table>	Site access requirements	Access utilising road permitted through previous outline consent (20/01131/OUT).	<b><u>Key requirements</u></b>	<ul style="list-style-type: none"> <li><b><u>Drainage infrastructure and strategic landscaping, including retention of existing ponds to the north west of the site and a green corridor along the stream to the north of the site.</u></b></li> <li><b><u>Undertake any necessary assessments, mitigation and/or enhancement requirements relating to impact on the historic environment, as identified in the relevant site assessment proforma</u></b></li> </ul>	To provide clarity on site specific requirements to ensure interpretation of Policy SA5 is effective.
Site access requirements	Access utilising road permitted through previous outline consent (20/01131/OUT).								
<b><u>Key requirements</u></b>	<ul style="list-style-type: none"> <li><b><u>Drainage infrastructure and strategic landscaping, including retention of existing ponds to the north west of the site and a green corridor along the stream to the north of the site.</u></b></li> <li><b><u>Undertake any necessary assessments, mitigation and/or enhancement requirements relating to impact on the historic environment, as identified in the relevant site assessment proforma</u></b></li> </ul>								

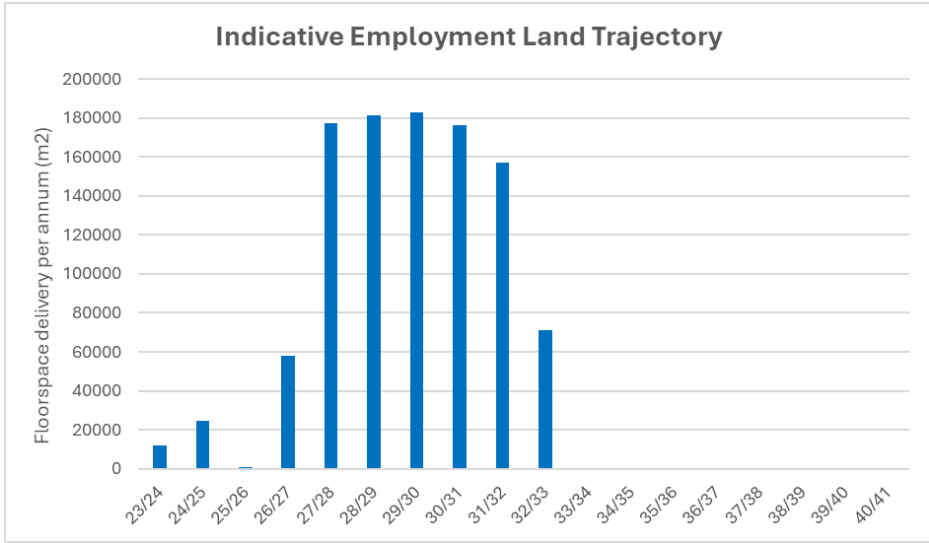
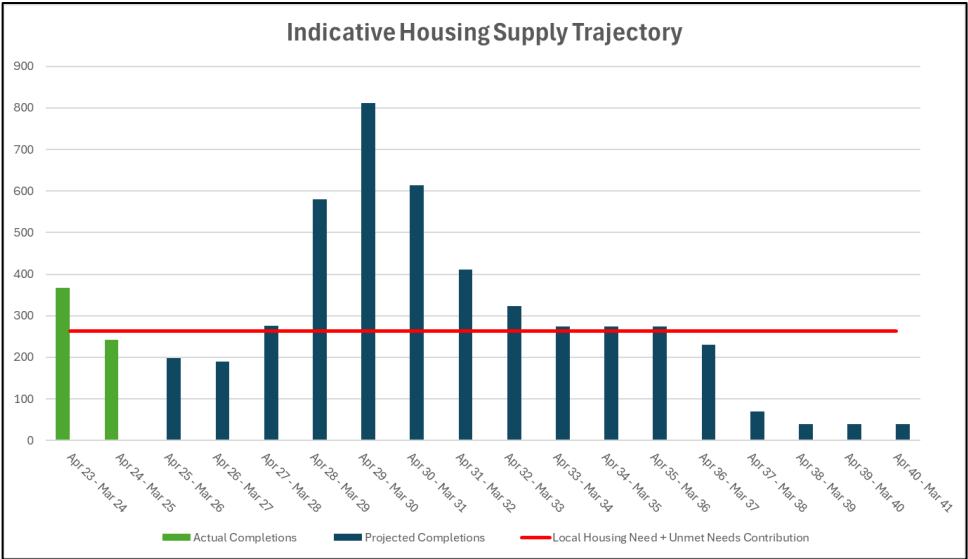
					<p><u>(sections E, F, G) in the HESA 2022, in consultation with the council's conservation officer.</u></p> <ul style="list-style-type: none"> <li>• <u>Gigabit-capable broadband connectivity where achievable.</u></li> <li>• <u>Any relevant policy requirements including energy efficiency, climate change mitigation and flood risk mitigation, delivered in line with the relevant development plan policy standards.</u></li> </ul>	
				<b>Proposed access/active travel measures</b>	<b><u>Vehicular and pedestrian access to the A449 utilising access road permitted through outline consent (20/01131/OUT), and pedestrian and cycle access link to Brookhouse Lane.</u></b>	
MM230	Action 99	Pg 247	Appendix E: Employment proforma (Site E24)	Amend -  <b>Site access requirements</b>  <b><u>Key requirements</u></b>	<p><del>Access through the existing business park (Innovation Drive).</del></p> <ul style="list-style-type: none"> <li>• <u>Undertake any necessary assessments, mitigation and/or enhancement requirements relating to impact on the historic environment, as identified in the relevant site assessment proforma (sections E, F, G) in the HESA 2022, in consultation with the council's conservation officer.</u></li> <li>• <u>Gigabit-capable broadband connectivity where achievable.</u></li> <li>• <u>Any relevant policy requirements including energy efficiency, climate change mitigation and flood risk mitigation, delivered in line with the relevant development plan policy standards.</u></li> </ul>	To provide clarity on site specific requirements to ensure interpretation of Policy SA5 is effective.

				<b><u>Proposed access/active travel measures</u></b>	<b><u>Vehicular and pedestrian access through the existing business park (Innovation Drive).</u></b>		
MM231	MM081  Action 99	Pg 248	Appendix E: Employment proforma (Site E30)	Amend -  <b><u>Site access requirements</u></b>  <b><u>Key requirements</u></b>	Access via the A449  <ul style="list-style-type: none"> <li>• <b><u>Creation of green infrastructure comprising open space and amenity space.</u></b></li> <li>• <b><u>The stopping up / diversion of existing public rights of way, and the creation of new routes.</u></b></li> <li>• <b><u>Supporting utilities infrastructure including a sustainable drainage system.</u></b></li> <li>• <b><u>Undertake any necessary assessments, mitigation and/or enhancement requirements relating to impact on the historic environment, as identified in the relevant site assessment proforma (sections E, F, G) in the HESA 2022, in consultation with the council's conservation officer.</u></b></li> <li>• <b><u>Gigabit-capable broadband connectivity where achievable.</u></b></li> <li>• <b><u>Any relevant policy requirements including energy efficiency, climate change mitigation and flood risk mitigation, delivered in line with the relevant development plan policy standards.</u></b></li> </ul>		To provide clarity on site specific requirements to ensure interpretation of Policy SA5 is effective.
				<b><u>Proposed access/active travel measures</u></b>	<b><u>The creation of an internal transport network with connections to the surrounding highway, cycle and pedestrian network (including 1no. vehicular junction onto the A449).</u></b>		

MM232	Action 99	Pg 249	Appendix E: Employment proforma (Site E33)	Amend -		To provide clarity on site specific requirements to ensure interpretation of Policy SA5 is effective.
<p><u>Site access requirements</u></p> <p><u>Key requirements</u></p>		<p>The sites infrastructure and access requirements are set out in the Development Consent Order (DCO) for the site.</p> <ul style="list-style-type: none"> <li>• <u>Green Infrastructure and landscaping/planting and mounding as per the consented DCO, including delivery of Calf Heath Community Park and Croft Lane Community Park.</u></li> <li>• <u>Undertake any necessary assessments, mitigation and/or enhancement requirements relating to impact on the historic environment as required by the DCO.</u></li> <li>• <u>Drainage infrastructure including attenuation ponds as required by the DCO.</u></li> <li>• <u>Gigabit-capable broadband connectivity where achievable.</u></li> <li>• <u>Any relevant standards required by the DCO, including energy efficiency, climate change mitigation and flood risk mitigation.</u></li> </ul>		<p><u>Proposed access/active travel measures</u></p> <p><u>Vehicular and pedestrian accesses as permitted through the Development Consent Order, including separate access roundabouts on the A5, A449 and Vicarage Road.</u></p>		
MM233	MM082 Action 99	Pg 250	Appendix E: Employment proforma (Site E44)	Amend -		To provide clarity on site specific requirements to ensure interpretation of
<p><u>Site access requirements</u></p>		<p>Access through existing i54 business park utilising access permitted through previous outline consent (18/00637/OUT).</p>				

				<p><b><u>Key requirements</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>Green infrastructure and drainage infrastructure.</u></b></li> <li>• <b><u>Undertake any necessary assessments, mitigation and/or enhancement requirements relating to impact on the historic environment, as identified in the relevant site assessment proforma (sections E, F, G) in the HESA 2022, in consultation with the council's conservation officer.</u></b></li> <li>• <b><u>Gigabit-capable broadband connectivity where achievable.</u></b></li> <li>• <b><u>Any relevant policy requirements including energy efficiency, climate change mitigation and flood risk mitigation, delivered in line with the relevant development plan policy standards.</u></b></li> </ul>	Policy SA5 is effective.
				<p><b><u>Proposed access/active travel measures</u></b></p>	<p><b><u>Vehicular and pedestrian access through existing i54 business park utilising access permitted through previous outline consent (18/00637/OUT).</u></b></p>
MM234	N/A	Pg 253	Appendix G	<p>Replace housing trajectory graph, add in employment land trajectory graph, and amend text – Indicative Housing <b>and Employment Land Trajectories</b> (as at 1st April <del>2023</del><b>2025</b>)</p>	<p>This modification updates the housing supply trajectory graph using the latest available data and adds in an employment land trajectory map. This provides clarity and ensures that the</p>

requirement is effective.



MM235	MM083  Actions 43, 44, 48 & IL06	Pg 261	Appendix J: Monitoring Framework	Inclusion of Triggers and Contingencies added to all policies included in the Monitoring Framework. Minor amendments to Targets and Indicators to add clarity. Provided as Appendix 01 to the Modifications Table.	The inclusion of Triggers and Contingencies are to provide clarity alongside other changes to Targets which ensures the monitoring framework is justified and effective.
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