

19th December 2022

South Staffordshire Council
Community Hub
Wolverhampton Road
Codsall
South Staffordshire
WV8 1PX

Sent via email only: localplans@sstaffs.gov.uk

Dear Sir/Madam,

REPRESENTATIONS TO SOUTH STAFFORDSHIRE LOCAL PLAN PUBLICATION STAGE, REGULATION 19, CONSULTATION

CarneySweeney has been instructed by Peveril Securities Limited, hereafter referred to as 'our client', to submit representations to the current Regulation 19 Consultation on the South Staffordshire Local Plan Review Publication Plan.

As you will be aware from previous representations, our client controls three sites broadly lying north and south of the M54 corridor between junctions 1 and 2 and has comments in relation to the following matters:

1. Development strategy in relation to housing.
2. Site specific matters regarding a proposed housing allocation.
3. The principle of requiring Green Belt Compensatory Improvements under Policy DS2.
4. Development strategy related to scale, provision and quality of employment allocations.
5. Proposals to allocate an extension to the established strategic employment site at Hilton Cross.
6. The allocation of a Biological Alert Site on part of land within our client's control.

Enclosed with these representations are three plans showing the sites our client is making specific comments on.

1. Development Strategy Relating to Housing

As noted in our client's representations to the South Staffordshire Local Plan Review Preferred Options, the housing land requirements for the period 2018 to 2038 are based on a combination of the requirements generated from Objectively Assessed Need (OAN) within the South Staffordshire local authority area and part of the unmet needs of the wider Greater Birmingham and Black Country Housing Market Area (GBBCHMA) that would be provided within South Staffordshire during the Local Plan Review period.

Our client notes there are a number of strategically significant employment sites located within the M54 corridor, including the South Staffordshire Core Strategy strategic sites at Royal Ordnance Factory; i54; Hilton Cross etc which are proposed to be added to by the West Midlands Interchange (WMI) allocation. The resulting concentration of such a large number of new jobs within the M54 corridor should be matched by the scale and provision of housing in the locality to promote sustainable development, i.e. housing should be available near where people would wish to work.



In the light of these factors relating to housing need in terms of quantum and location, our client remains of the view that the Local Plan Review should safeguard land to provide for more housing convenient to the M54 corridor in the southern part of the borough close to the strategic employment sites. This could potentially be via a targeted review of certain Green Belt boundaries on the condition that any safeguarded land identified would not be required to be developed unless a need for more housing can be demonstrated.

The proposed housing target set out in proposed Policy DS4 of the Publication Plan is 208 dwellings higher than over the plan period at the Preferred Options Stage. However, the length of the plan period has also increased by a year. Our client remains of the view that the housing target does not provide sufficient flexibility to ensure that the minimum housing target can be delivered within the Plan period. This is because, typically, some 10% of all permissions and allocations may 'fall out' during the Plan period due to various reasons. Therefore, our client remains of the view that further dwellings should be allocated through the Local Plan Review to ensure the minimum housing requirements can be met despite either delays or problems arising with the delivery of housing allocations. This supports our client's view that new land should either be allocated or safeguarded for housing development. The current proposed overall provision of housing would not support the Government's objective of significantly boosting the supply of homes as required under NPPF Paragraph 60.

2. Site Specific Comments on a Housing Allocation

In the context of our client's concerns regarding the Council's proposed quantum of housing provision over the plan period, the proposed strategy of allocating a number of larger sites to generate significant housing numbers is welcomed. In particular, these larger housing allocations should be located within easy access to the M54 corridor. Therefore, our client supports in principle the allocation of the 'Cross Green' site under proposed Policy SA2 but as they only control a small portion of this allocation it is considered that those with interests in larger portions of the wider allocation are better placed to provide site-specific comments.

3. The Principle of Requiring Green Belt Compensatory Improvements Under Policy DS2

Our client notes that proposed Policy DS2 – 'Green Belt compensatory improvements' relates to the Cross Green site allocation and other housing sites to be removed from the Green Belt through the Local Plan. Proposed Policy DS2 requires compensatory improvements to the environmental quality and accessibility of remaining Green Belt to be incorporated into a Section 106 agreement for development proposals on sites removed from the Green Belt. Our client acknowledges NPPF Paragraph 142 states strategic policy-making authorities should "...also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land." However, proposed Policy DS2 could be viewed as overly rigid in the methods by which these improvements can take place and could be interpreted as requiring compensation through financial means before former Green Belt sites can be developed. Policy DS2 should be re-worded to place a greater emphasis on the delivery of qualitative improvements to environmental quality and accessibility of remaining Green Belt land.

4. Development Strategy Relating to Employment Allocations

Our client continues to support the strategy for employment in the Local Plan Review which places an emphasis on delivering strategic employment sites given their ability to provide quality employment land due to their location and transport linkages. Peveril Securities Limited is a joint applicant (with St Francis Group) on the application granted for employment purposes on the Royal Ordnance Factory (ROF) site and welcomes the Council's continued support for ROF through its proposed allocation in the Local Plan Review.

Whilst our client also welcomes the allocation of the WMI site, it notes in Table 9 of the Local Plan Review that the Council's intention is to deliver 328 hectares of employment land in the period 2020 to 2040, of which 71% of that provision (232.5 hectares) is intended to come forward on a single site - the



WMI site. Should there be issues regarding the delivery of this site, this could significantly impact on the supply of employment land over the plan period.

5. Proposed Hilton Cross Extension Site Allocation

It is noted that paragraph 6.44 of the Local Plan Review states the allocation of the WMI site will be "*balanced by smaller scale employment opportunities (Hilton Cross)*". The Hilton Cross site has historically been identified as an important strategic employment site both in the Core Strategy and the SAD – mainly for previously B1 uses. Only a relatively small portion of the site – some 5 hectares – is now available to be taken up. Therefore, our client remains of the view that in order to recognise the benefits that the Hilton Cross site has to complement WMI, the Hilton Cross allocation should be extended to provide more land for well-located small scale employment opportunities close to the M54.

Our client asks once again that the Council considers allocating an extension to the Hilton Cross site and is proposing that land to the south of Hilton Cross should be specifically allocated for employment purposes (see enclosed drawing ref. TTE 00 XX DR UD 12 Rev A – Land South of Hilton Cross Strategic Employment Site). The proposed extension to Hilton Cross would be served by a new access from the A460 and its release would result in defensible boundaries to the Green Belt being established in the form of existing roads/tracks and tree belts. This allocation should be for Class E(i), (ii) and (iii) and can be made through a change to Table 9 with an appropriate reference to the extension to the Hilton Cross site being made within the paragraph headed "The district's freestanding strategic employment sites" in Policy DS5.

6. Biological Alert Site

It is noted that a portion of our client's proposed extension to the Hilton Cross site is allocated on the Policies Map for the Local Plan Review as a 'Biological Alert Site' under proposed Policy NB1. However, there is no specific reference to Biological Alert Sites in the Local Plan Review, nor are there any specific references to Biological Alert Sites in the evidence base available on the Council's website.

It is understood the allocation of Biological Alert Sites has been carried forward from the adopted South Staffordshire Core Strategy, however there is no evidence to demonstrate that the continuing allocation of these sites is based on up-to-date evidence. Notwithstanding, should the Council retain the proposed inclusion of Biological Alert Sites on the Policies Map, the Hilton Cross extension put forward by our client is capable of being delivered for employment alongside the retention and enhancement of the Biological Alert Site.

We trust that these representations will be taken into account as part of the ongoing preparation of an emerging Local Plan. Our client would be willing to discuss all matters raised by these representations with the Council.

Yours faithfully,




Sophie Drury
Associate Director
CarneySweeney

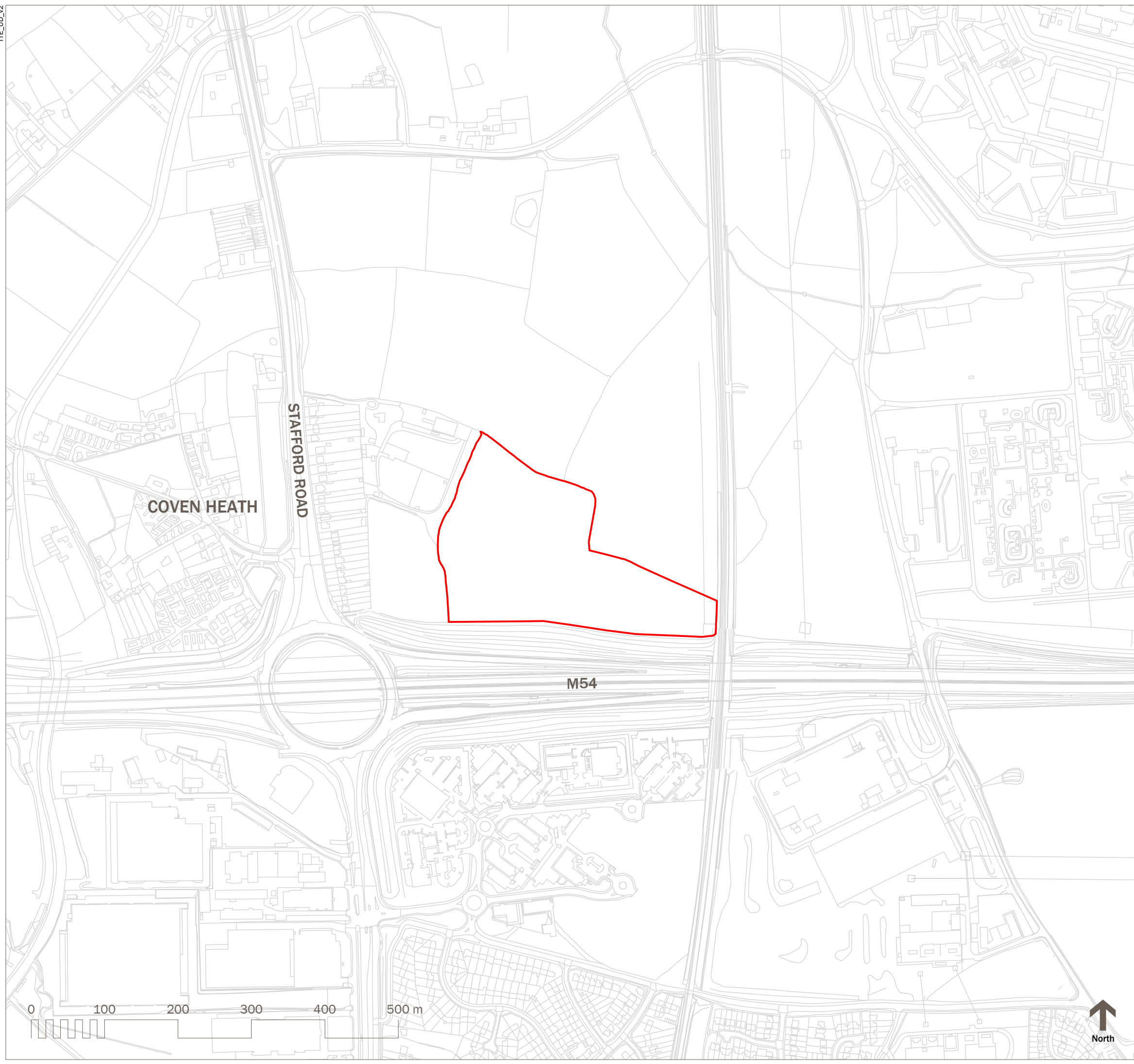
Appendix 1: Drawing refs. TTE 00 XX DR UD 10 Rev A – Land West of West Coast Mainline; TTE 00 XX DR UD 11 Rev A – Land North West of Featherstone; and TTE 00 XX DR UD 12 Rev A – Land South of Hilton Cross Strategic Employment Site.



Appendix 1



Key
 Site boundary (5.6ha)



**South Staffordshire Local Plan
 Review Representations**

Document control

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A	Updates to title block	10.12.21	BR	BR	AC
Rev	Description	Date	Dwn	Chk	App


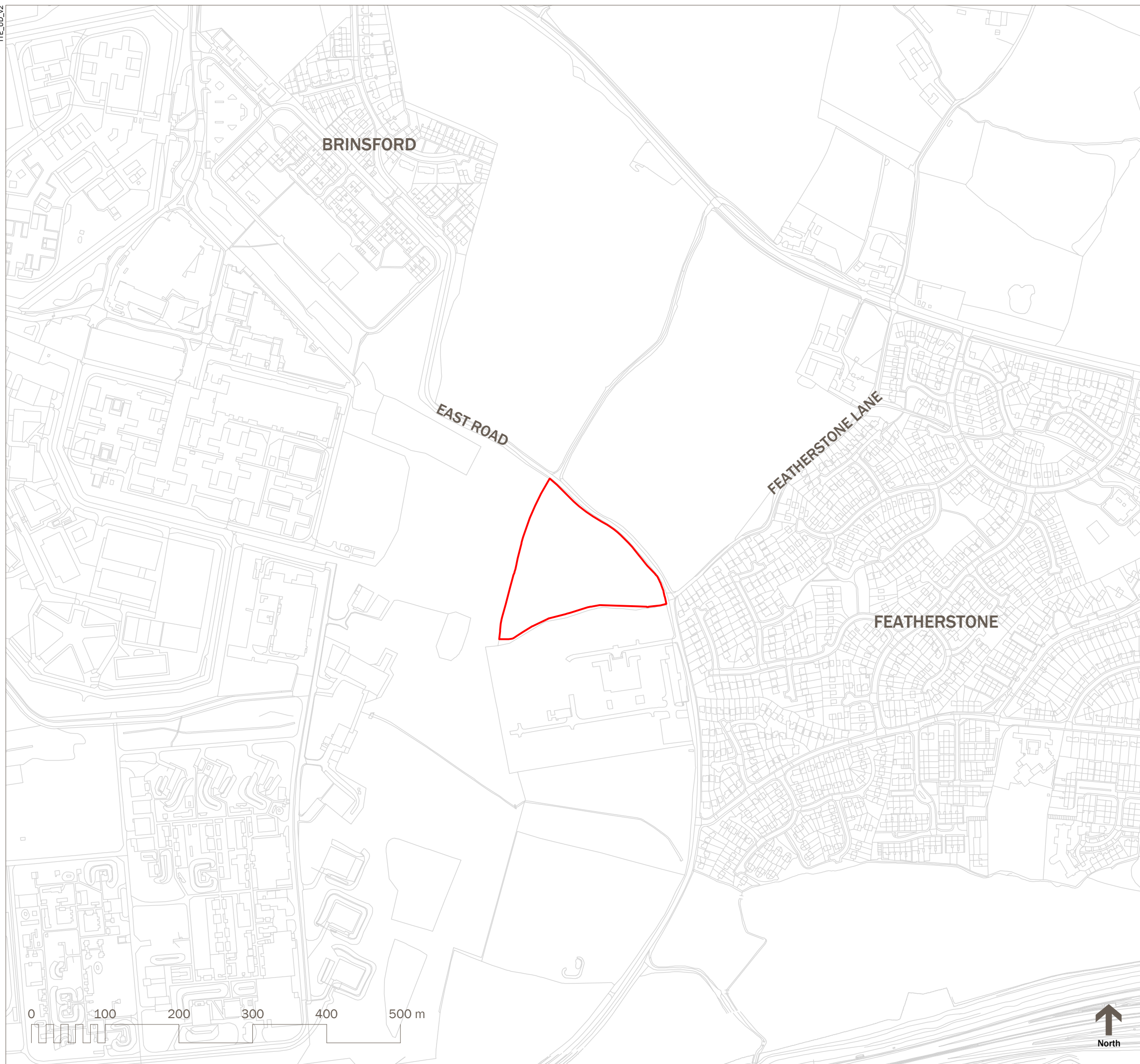
Peveril Homes
 Land west and south of Featherstone, Staffordshire
 M54 Corridor (North of Wolverhampton)

LAND WEST OF WEST COAST MAINLINE

TTE Proj No	Drwn / date	Ch'ked / date	Appr'd / date	Scale @ A3	Suitability		
A099286	BR / DEC '21	BR / DEC '21	AC / DEC '21	1:5,000	-		
Client Proj No	Origin	Vol/System	Level/Loc	Type/Code	Role	Drwg no	Revision
-	TTE	00	XX	DR	UD	10	A

Issuing office
Tetra Tech Manchester
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TTE_UD_V2

Key
 Site boundary (2.5ha)


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Review Representations**

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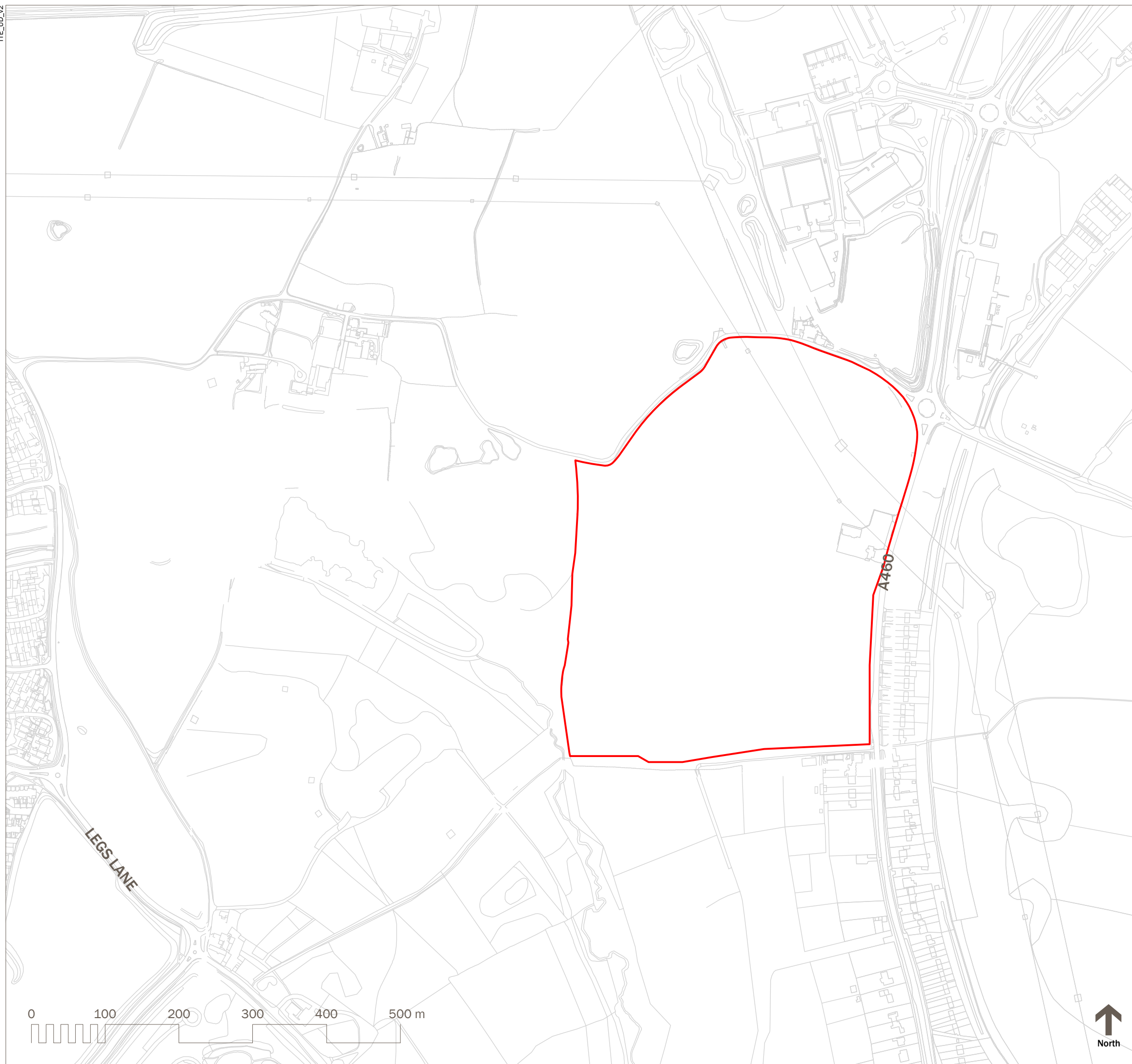
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LAND NORTH WEST OF FEATHERSTONE

TTE Proj No	Drwn / date	Ch'ked / date	Appr'd / date	Scale @ A3	Suitability		
A099286	BR / DEC '21	BR / DEC '21	AC / DEC '21	1:5,000	-		
Client Proj No	Origin	Vol/System	Level/Loc	Type/Code	Role	Drwg no	Revision
-	TTE	00	XX	DR	UD	11	A

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Key
 Site boundary (21.6ha)



**South Staffordshire Local Plan
 Review Representations**

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Rev	Description	Date	Dwn	Chk	App

Peveril Homes
 Land west and south of Featherstone, Staffordshire
 M54 Corridor (North of Wolverhampton)

**LAND SOUTH OF HILTON CROSS STRATEGIC
 EMPLOYMENT SITE**

TTE Proj No	Drwn / date	Ch'ked / date	Appr'd / date	Scale @ A3	Suitability		
A099286	LA / DEC '21	BR / DEC '21	AC / DEC '21	1:5,000	-		
Client Proj No	Origin	Vol/System	Level/Loc	Type/Code	Role	Drwg no	Revision
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