



1 Springhill SHIFNAL Shropshire TF11 8FA

Tel: 07976 080813

Email: andy@advance-planning.co.uk

SOUTH STAFFORDSHIRE LOCAL PLAN 2018-2038 PREFERRED OPTIONS

**LAND OFF SAREDON ROAD, CHESLYN HAY
(SITES 119 (part); 119a and 119b)**

On behalf of Mr M. Stephens

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1.0 Introduction

- 1.1 This representation is submitted on behalf of Mark Stephens, who owns approximately 5.53 hectares of land on the north side of Saredon Road, Cheslyn Hay. The following comments are generally consistent with, but expand upon those we submitted in respect of the Housing Strategy and Infrastructure Delivery consultation in 2019.
- 1.2 We are aware that Cameron Homes has also submitted representations in respect of Site 119/119a, which we general endorse, however, this is a separate, stand-alone representation submitted on behalf of the landowner.

2.0 Land off Saredon Road (Sites 119 (part)/119a/119b)

- 2.1 Our client's land comprises two fields that extend from a private track in the east (serving as a right of way to a former sewage works, currently operating (unlawfully) as a commercial wood yard), up to a woodland belt with the M6 Toll Link Road, beyond, to the north-west.
- 2.2 The eastern field parcel is triangular in shape and measures approximately 2.6 hectares. It is flat and featureless and slopes very gently down to a watercourse in the north-west. The parcel is well-defined by Saredon Road to the south-west and mature hedgerow vegetation along the north-eastern boundary. Its northern boundary is defined by a broken hedge along the line of the watercourse, with a crossing into the western field parcel
- 2.3 The western parcel is roughly square shaped and measures approximately 2.93 hectares. It is similarly featureless, but with a gentle slope down to the watercourse in the east. It too fronts onto Saredon Road in the southwest; its north-western boundary adjoins a woodland belt; and its north-eastern boundary adjoins a large scale industrial building on the South Staffordshire Business Park. It therefore has well-defined boundaries and exhibits a strong sense of physical and visual enclosure.
- 2.4 In terms of land-use planning, the south-eastern tip of our client's land is already allocated for housing as part of SAD Site Allocation 119. This small residual element of the Site 119 allocation measures approximately 0.6 hectare and its western boundary is not defined by any physical features to separate it from the land immediately to the west (119a).

- 2.5 The remaining part of the eastern field parcel, measuring approximately 2 hectares together with the former sewage works/wood yard to the north (approximately 0.7 hectare) was also removed from the Green Belt and identified as Safeguarded Land (Site 119) in the SAD. The safeguarded land is now proposed for housing (119a).
- 2.6 Because of access constraints, it is unlikely that the wood yard could be redeveloped independently of our client's land and to date, the owner has given no indication to us of any intention to promote residential development of the wood yard. Indeed, recent planning history suggests that the owner seems is more intent on seeking to establish and consolidate the commercial use, rather than to make the property available for residential development.
- 2.7 Our client's most western field parcel (119b) is currently in the Green Belt, although in due course, it will have development to its north-east (employment) and south-east (housing), with a highways depot to the north. It will, therefore, appear very much within the physical and visual confines of the settlement and effectively severed and disassociated from the open countryside on the south-western side of Saredon Road.

3.0 Representations

- 3.1 Great Wyrley and Cheslyn Hay Tier 1 settlements that offer a wide range of community services and facilities and also are close to significant employment areas. They are in a highly accessible location between Cannock to the north and the West Midlands conurbation to the south and they benefit from excellent links to the local, regional and national road networks and also a rail link. Consequently, these two settlements represent a logical and sustainable location for housing growth.
- 3.2 We therefore support the settlement hierarchy approach that has been devised, supposedly to reflect the level of service provision at each settlement (paragraph 2.7).
- 3.3 We are, however, compelled to object strongly to the proposal to only allow 'limited' further growth at Cheslyn Hay/Great Wyrley, beyond the existing allocated/safeguarded land, referencing the GBHMA Strategic Growth Strategy and site specific constraints affecting land in the area. (paragraph 4.16 bullet point 2 and paragraph 4.33) for this stance.

- 3.4 The Strategic Growth Study was focussed on assessing the opportunities for large scale urban extensions or new settlements and did not consider the scope for the allocation of additional more modest allocations around the peripheries of settlements such as Cheslyn Hay and Great Wyrley to meet the District's needs. It therefore seems to be rather spurious reason for not allowing more growth in these two settlements.
- 3.5 Of course, all sites tend to have constraints of one kind or another, whether policy (Green Belt) environmental (landscape or habitat related) or technical (highways, drainage, etc). We suggest that sites around the edges of Cheslyn Hay and Great Wyrley are no more constrained than those around other Tier 1 and Tier 2 settlements.
- 3.6 **It therefore makes no good planning sense to deliberately 'limit' housing growth on appropriate sites on the edge of these two settlements. Housing provision should be comparable with the other Tier 1 settlements and certainly no less than proposed for Wombourne (Tier 2).**
- 3.7 We agree with the Council that land at Saredon Road, Cheslyn Hay represents an excellent location for new housing development on the former SAD Site 119 and the proposed new allocation of Site 119a. This location is immediately opposite both Cheslyn Hay Primary School and also Cheslyn Hay Academy (Secondary) as well as the Leisure Centre.
- 3.8 **We can confirm that the residual element of SAD allocation Site 119 (0.6 ha) remains available for development in conjunction with our client's adjoining land (119a and 119b)**
- 3.9 Site 119 was scrutinised and endorsed by the Council and the Inspector through the SAD process and it was subsequently removed from the Green Belt, placed within the Inset boundary for Great Wyrley and allocated for housing. Our client has delayed bringing forward this small parcel, so as to await the allocation of the safeguarded land for housing and allow it to be developed comprehensively along with our client's adjoining land.
- 3.10 **We also support the Council's Proposed Housing Allocation of our client's part of Site 119a for housing (2 ha).**

- 3.11 In a District such as South Staffordshire, which is predominantly Green Belt, it is important to make best use of land that is not in the Green Belt. The proposal to remove Site 119a from the Green Belt and 'Safeguard' it to meet future development needs, was scrutinised and endorsed by the Inspector through the SAD process. Residential development on the majority of the SAD allocation Site 119 has been approved and is now under construction and it so makes good planning sense to now bring forward Site 119a for development along with the residual element of Site 119.
- 3.12 Whilst we do not object to the future residential redevelopment of the northern part of the proposed housing allocation Site 119a (which is currently in use as a wood yard). the recent actions of the owner/operator bring into question whether it is genuinely available and can be relied as part of the allocation.
- 3.13 Given the owner's actions over recent years to submit applications and appeals to secure the use of the former sewage works site as a wood yard (0.7 ha), we have to question whether this separate, land-locked property is genuinely available and can be relied as part of the allocation. **If not, then perhaps it should be included without notation within the Development Boundary of Cheslyn Hay so that it can come forward as an acceptable modest windfall, if and when circumstances allow.**
- 3.14 **We strongly maintain that there is strong policy based evidence to support the deletion of Site 119b (2.93 hectares) from the Green Belt and allocating it for housing and green/open space. Such a proposal would allow for the delivery of an attractive and well-planned comprehensive development in conjunction with Sites 119 and 119a. Alternatively, the Site 119b should at least be 'Safeguarded' to meet future development needs.**
- 3.15 The Illustrative Development Concept Plan (2241-100) included as Appendix 1, demonstrates how the residual part of the original allocation Site 119; the proposed allocation Site 119a and also the suggested additional Site 119b (5.53 hectares) could be comprehensively developed for housing (minimum 100 dwellings), with a substantial green/open space buffer around the north-western and north-eastern boundaries, which could potentially remain in the Green Belt, if considered appropriate.

- 3.16 We note that the Council commissioned a Green Belt Study (2019) to assess the harm that would result to the Green Belt if land were to be released in various locations. We also note that a Landscape Sensitivity Assessment (2019) was commissioned. These Studies, represent two of the most important elements of the evidence base that ought to inform the Preferred Option and site allocations.
- 3.17 It is particularly worthy of note that Site 119b is assessed as having a rating of 'low/moderate' harm to the Green Belt and in point of fact, the majority of its ratings against the five green belt purposes are assessed as 'weak/no contribution'. The parcel is also assessed as having 'low landscape sensitivity'.
- 3.18 Furthermore, the land is in flood zone 1; it holds no known heritage or significant biodiversity value and its development would not compromise the continued working of the nearby clay pit further to the east. Development in this location would sensibly round-off and consolidate the built-up area in this highly sustainable location close to schools and employment opportunities.
- 3.19 Based upon the available evidence, there is no sound policy justification for not allocating Site 119b. Indeed, we suggest that when considered against alternative sites and locations, there are compelling policy and practical reasons for removing this land from the Green Belt and allowing it to be developed in conjunction with the adjacent allocations (119 and 119a).
- 3.20 The 'Interim Sustainability Assessment (SA) – Preferred Options: Selection and Rejection' confirms that development of Site 119b would have lower Green Belt harm and the site also has lesser Landscape sensitivity, which are both major advantages, but the only reason we can identify from the published evidence, for rejecting the site appears to be because the *"highways authority raise initial concerns with impact on surrounding junctions"*.
- 3.21 From correspondence with the County Council, we understand that these 'initial concerns' were not based upon a detailed technical assessment of the potential additional impact the allocation of site 119b might have on the road network over and above the acceptable proposed sites (119 and 119a). Instead they represented an initial, informal opinion that was expressed by the County Highways Officer to the Local Planning Authority.

- 3.22 The Transportation Assessment undertaken to support the application for residential development on the majority of Site 119, demonstrated that the local highway network does have the capacity to accommodate further development off Saredon Road.
- 3.23 That said, it is acknowledged that Saredon Road and its junction with Wolverhampton Road and High Street is very busy for short periods in the morning peak and mid-afternoon, when the two schools are open. Therefore, as part of the iterative and naturally evolving IDP process, our client is willing to instruct Transportation Consultants to assess any potential additional impact of allocating Site 119b and then to engage with the Highway Authority to consider appropriate and proportionate mitigation options for the Wolverhampton Road/Saredon Road/High Street junction.
- 3.24 The allocation of additional land could, therefore, provide an opportunity to deliver highway improvements that would represent wider community benefit. Site 119b, which clearly performs well in all policy respects, should not, therefore, be discounted because of an unsubstantiated 'Initial concern', without further serious technical highways assessment, which our client is prepared to undertake as part of a constructive ongoing dialogue with the Highway Authority.
- 3.25 **In terms of Policy HC17, we support the proposed open space requirement of 0.006ha per dwelling, which we consider this to be a more reasonable requirement than the one contained in the existing Development Plan.**
- 3.26 **We are, however, concerned that the emerging requirements appear to provide no flexibility with regards to a site's context.**
- 3.27 For instance, the requirement for open space to be centrally located is overly prescriptive and may not be appropriate when considering on-site constraints. We suggest that the word 'centrally' should be replaced with 'appropriately' located, but if the Council considers it necessary to elucidate on the matter, reference could be made to the location of open space respecting the principles of good urban design, accessibility and public surveillance, etc. We note that the Local Planning Authority intends to prepare an Open Space, Sports and Recreation SPD in due course, so more detail could be provided in that document if necessary.

4.0 Conclusions

- 4.1 There is no sound planning evidence to 'limit' housing growth on appropriate sites on the edge of Cheslyn Hay and Great Wyrley, which possess all the necessary infrastructure credentials to accommodate further growth. Housing provision should be comparable with the other Tier 1 settlements and certainly no less than proposed for Wombourne (Tier 2).
- 4.2 We confirm that the residual element of SAD allocation Site 119 (0.6 ha) remains available for development in conjunction with our client's adjoining land (119a & 119b)
- 4.3 We also support the Council's proposed housing allocation of our client's part of Site 119a (2 ha) to help meet the District's development needs, in the emerging Plan.
- 4.4 We do not object to the future residential redevelopment of the northern part of the proposed housing allocation Site 119a (which is currently in use as a wood yard). However, the recent actions of the owner/operator bring into question whether it is genuinely available and can be relied as part of the allocation. Instead, perhaps it should merely be included within the Development Boundary of Cheslyn Hay so that it can come forward as an acceptable modest windfall, if and when circumstances allow.
- 4.5 We strongly maintain that there are no sound planning policy reasons for not removing Site 119b (2.93 hectares) from the Green Belt and either allocating it for housing and green/open space, or at least safeguarding it to meet future needs. Indeed, we contend that the findings of the Green Belt Study and the Landscape Sensitivity Assessment support our view that the site will have less impact than several other proposed allocations of the Plan. We maintain that allocation of Site 119b would allow for the delivery of an attractive and well-planned comprehensive development in conjunction with Sites 119 and 119a.
- 4.6 We also maintain that any impact on the local highway network resulting from development on Site 119b is likely to be negligible when the cumulative impact of all committed and local plan sites are considered. Nonetheless, it is acknowledged that there may be scope to improve the operation of the Saredon Road/Wolverhampton Road/High Street junction and so our client is prepared to enter into discussions with SCC to consider the mitigation options and a proportionate contribution towards junction improvements.

- 4.7 We support the open space requirement of 0.006ha per dwelling, but we seek more flexibility to allow for the location and design of open space and recreation facilities having regard to a site's context.
- 4.8 We would welcome a virtual meeting with Officers to discuss these representations.