



SOUTH STAFFORDSHIRE COUNCIL PREFERRED OPTIONS CONSULTATION NOV/DEC 2021

REPRESENTATION

in respect of
LAND EAST OF WROTTESELEY PARK ROAD, PERTON
on behalf of

BARBERRY (PERTON) LTD

13 December 2021

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1. INTRODUCTION

- 1.1. This is a representation made on behalf of Barberry (Perton) Ltd in respect of land east of Wrottesley Park Road, Perton.
- 1.2. The representation relates to the South Staffordshire Council Local Plan Review, which has reached the Preferred Options stage. The consultation is ongoing and ends on 13th December 2021.
- 1.3. We have considered the existing Development Plan as it now stands and have also considered the policies being proposed by the emerging Local Plan. We do not respond to all sections of the emerging plan, only those which we currently consider relevant. These views are without prejudice to future submissions or hearing statements, which may be made in advance of the Examination stages.

Structure

- 1.4. The response makes comments on the following paragraphs, policies and evidence documents, and we end with further information regarding the Land west of Wrottesley Park Road, Perton:

Paragraph	Policy
	Strategic Objective 1
	Strategic Objective 2
	Strategic Objective 9
	DS1
	DS2
4.7	
	DS3
	SA2
	HC1
	HC3
	HC4
	HC6
	HC7
	HC9
	HC11
	HC14
	HC15

	HC17
	HC19
	NB5
	NB7
Sustainability Appraisal (Aug 2021), Appx F	
Green Belt Study (2019)	
South Staffs SHMA (2021)	
GBSHMA (2018)	

2. Representation

Summary

- 2.1. The Council identified the preferred spatial strategy for distributing growth in the Spatial Housing Strategy and Infrastructure Delivery Plan (October 2019) (SHSIDP). The Plan has been prepared to provide a level of housing growth which would meet South Staffordshire's housing needs plus a 4000-home contribution towards the unmet needs of the wider Greater Birmingham Housing Market Area. Option G from the SHSIDP has been identified as the preferred option, which is infrastructure-led development with a garden village area of search beyond the plan period. We do not consider that sufficient information has been provided on the calculation and distribution of the 4000-home figure to be able to comment on the suitability of the preferred strategy or the supporting Infrastructure Delivery Plan (IDP).
- 2.2. We are concerned that focussing the majority of growth on large strategic sites that are reliant on the delivery of infrastructure could lead to delayed delivery of numbers in the plan. For resilience and flexibility, we consider that a greater number of smaller sites should be allocated.

Strategic Objective 1

- 2.3. This Objective states that where Green Belt release is necessary, there will be a mechanism in place to secure compensatory improvements to the remaining Greenbelt. We are concerned that, given the stage of the plan review, this is not substantiated in any further detail, and it is unclear how the Council intends for this to be delivered. Whilst improving environmental quality and access to remaining Green belt land would be a positive objective in accordance with the Framework (para 142), it is unlikely that a developer would have access to another parcel of land to improve and as much of the Green Belt will be in private ownership (such as agricultural land), securing contributions to improve that land is likely to be unlawful. We do not consider this objective to be deliverable.

Strategic Objective 2

- 2.4. We support this Objective which seeks to meet the needs of the district whilst making a proportionate contribution to the needs of the Greater Birmingham Housing Market Area (HMA). However, it is unclear how this contribution is disaggregated to each Authority within the HMA, so we suggest greater clarity is provided in the plan to give more confidence and clarity in the Plan. Details of any agreements made under the Duty to Co-operate or in Memoranda of Understanding or Statements of Common Ground should be included in the Evidence Base.

Strategic Objective 9

- 2.5. The Council's preferred spatial strategy for growth was option G, which was for an Infrastructure-led spatial housing strategy. This strategy relies on new train stations, but rail is not mentioned within the objective. We suggest this Objective therefore requires amending.
- 2.6. Further the importance placed on rail links set out in Option G does not translate into some of the sites selected. Clearly Perton is not on a rail connection; albeit neither is Linthouse Lane and that is subject to a significant allocation as an urban extension.

Policy DS1 Green Belt

- 2.7. Firstly, we consider that this policy largely repeats the Framework, and to simplify the plan, could be – in part – removed, and replaced to refer the reader to the Framework instead.

- 2.8. The accompanying text again refers to “compensatory improvements to the environmental quality and accessibility of remaining Green Belt, including improving access to the countryside and ecological and biodiversity enhancement, are made”. However, as stated previously, the way in which this would be delivered has not been defined and creates uncertainty for landowners and developers. It is unclear what is meant by “remaining Green Belt”, because whilst it might be feasible to provide high quality, on-site green infrastructure, and open space (within the confines of other policies), if the improvement is made on an allocated development site, it will have therefore been removed from the Green Belt as part of this Plan. If the intention is to improve Green Belt land unrelated to this site, then a contribution would not meet the tests required. It is notable that the Plan refers to the idea of compensation on several occasions, but it is not mentioned within the policy itself.
- 2.9. The policy also states that “Development within the Green Belt must retain its character and openness”. This statement would appear contradictory, and it is unclear how this could be achieved in practice. Development will inevitably have an impact on openness, so the policy wording as it stands appears impracticable and undeliverable.
- 2.10. We would encourage the Council to demonstrate that they have met the exceptional circumstances required to remove sites from the Green Belt. Whilst we are not suggesting that these have not been met, this is likely to be important at the examination to demonstrate why Green Belt releases have been chosen above some non-Green Belt sites, in order to avoid the situation that arose with the West of England Plan.

Policy DS2 Open Countryside

- 2.11. It is not clear from the wording of proposed policy DS2 what types of development would or would not be acceptable in open countryside. Under DS2 (A) the council to refer to a singular new ‘building’ when this should read ‘building(s)’ in our view. We also consider the policy wording as a whole should be revisited.

Paragraph 4.7

- 2.12. We consider that in light of known worsening housing affordability during the pandemic that the plan should be revisited when the ONS house price to earnings data is updated in March 2022.
- 2.13. We consider that in light of known worsening housing affordability during the pandemic that the plan should be revisited when the ONS house price to earnings data is updated in March 2022.
- 2.14. The relative proportion of safeguarded land sites (1,608) against the provision of housing overall (5,348) seems high. It is not clear whether these are intended to remain as safeguarded land in the emerging Local Plan or whether they will be converted to allocations – clarity is required. If they are intended to remain as safeguarded sites, whilst we accept the need for safeguarded sites which reduce the need for a continuously reactive reassessment of green belt boundaries in future, we would have concerns that such a high proportion of reserve sites is surely less ‘plan led’ as a result. The same applies to the windfall allowance, which we also consider to be excessive.
- 2.15. Table 8 of the PO Local Plan seems to include safeguarded land as contributing to the overall OAN and is not included as additional land ‘above and beyond’ their requirement. If the safeguarded land is being converted to allocation, then we have no issue with this approach.

2.16. However if the safeguarded sites are to remain as such, we do have concerns. The role of safeguarded land in the Green Belt is fairly straightforward: it provides flexibility during plan reviews where 5 year supply dips, or there are other problems with delivery. To that end the contribution safeguarded land makes to the current OAN figure should be little to none, with safeguarded sites included that are above and beyond the OAN figure. This would take account of their intended long term permanence and endurance beyond the Plan period, in combination with the requirement at NPPF 143(e) that green belt boundaries should not need to be altered at the end of the Plan period.

Policy DS3 – The Spatial Strategy to 2038

2.17. There is some confusion here whether the new development is being built to address previous infrastructure issues and the extent to which this will address and accommodate new development. Is the proposed growth reliant on new infrastructure, or being proposed as a mechanism to deliver new infrastructure to address existing deficiencies? We are concerned that existing sustainable settlements are not receiving allocations and growth is instead being focussed on large allocations in seemingly rather less sustainable locations that will be reliant on largescale infrastructure delivery to make them sustainable. Typically, such sites also have substantial lead in times.

2.18. The third paragraph states that the priority is “to ensure that growth is distributed to the district’s most sustainable locations, avoiding a disproportionate level of growth in the district’s less sustainable settlements”. But if this is the case, this would not appear to relate well to the proposals to allocate large Urban Extensions which are so large, they will require their own infrastructure. This appears to be generic and does not relate well to Perton, which is a sustainable location and which is only subject to very limited growth through the release of a safeguarded site from the previous local plan. This is one of the most unaffordable areas of the Borough and proportionate growth and the attendant improvement in housing choice and 30% affordable housing provision appears not to have been factored into the decision-taking here.

2.19. We note that policy DS3 indicates that ‘Land at Cross Green’ is put forward and is anticipated to deliver a large scale housing development of 1200 dwellings. Within Policy DS3, it is stated that ‘the Council will continue to work with partners to seek opportunities to deliver’ this site. However, this seems very vague and given the time that has elapsed since housing delivery strategy Option G was chosen, we would have expected more progress to have been made on this.

2.20. In relation to policy DS4 – we have a minor observation in relation to this policy is why it is included when it applies to a time period outside of the scope of the plan. Why not extend the plan period instead?

Policy SA2 - Strategic development location: Land at Cross Green

2.21. Policy SA2 sets out the context of the site allocation at Cross Green. We note in this policy that the justification of allocating this site is heavily reliant on the ‘Land at Cross Green SPD’, which has not yet been published and is claimed to be adopted in the ‘early years of the plan period’. The policy’s objectives for the site are ambiguous as they do not carry any weight to guarantee the site’s delivery.

2.22. The heavy reliance on a pending SPD does not provide certainty that the site is deliverable and there is currently no clear justification provided which demonstrates that this allocation can be implemented. With no clear timeline of when this site can be delivered, we consider that the

council should look to allocate further sites to ensure that they are still able to meet the housing target of 8,881 dwellings over the plan period.

Policy HC1 – Housing Mix

- 2.23. This policy states that market housing will need to provide 75% of the development as 3-bed dwellings or smaller. This policy could be more flexible where it would allow for different approaches to phased development and other development outside of the scope of the plan, including rural exception sites.

Policy HC3 – Affordable Housing

- 2.24. It is unfortunate that flexibility has not been afforded in respect of the affordable housing tenure mix. We consider that this policy should be amended to avoid it being fixed, so that other evidence (such as that provided by Registered Providers or through housing needs assessments for individual parishes) and the SHMA can be considered. The Plan also seems to suggest that this could therefore not be reviewed until the Plan itself is reviewed in more than 5 years' time.
- 2.25. This Policy comments on the desirability of 'pepper potting', but to provide greater clarity for applicants, this should be quantified. For example, including a statement such as "unless the application is for entirely affordable housing, clusters of approximately 9 dwellings or less, should be used", would assist.
- 2.26. The policy contains a suggestion that the Council will not support forms of grant funding, it is not clear what is meant by this and should be removed as it relates to the policies of third party grant providers (such as Homes England) which are outside the control of the Local Plan.
- 2.27. When discussing potential offsite/financial contributions, this should be clarified by stating that this will be subject to viability/market evidence.
- 2.28. It is suggested that the final bullet point be removed. It is unclear on what basis the Council could assume that all policy compliant developments will be viable, this risks failing to take into account the nuances of site specific circumstances.

Policy HC4 – Homes for Older People

- 2.29. The requirement for 30% of all market and affordable homes to meet Building Regulations Standard Part M4(2), in addition for the requirement for all homes to meet Nationally Described Space Standards, is unnecessary burdensome on developers. What is the justification for 30%? What is the justification for both standards being required? The land-take for a dwelling to meet both NDSS and M4(2) can be high and can lead to dwellings that are of a floor area that takes them above local affordable housing price thresholds and local market price levels. It can also lead to an inefficient use of land.

Policy HC6 – Rural Exception Sites

- 2.30. This policy accepts that a small amount of market housing would be permitted in proposals outside of the Green Belt where essential to the viability of the scheme. Whilst we generally support this policy, we are unclear why this is only something permissible outside the Green Belt, since being within or outside the Green Belt will have no impact on the viability of the scheme. Given that the vast majority of South Staffordshire is within the Green Belt, this is a sweeping restriction that appears to lack clear justification.
- 2.31. There have been a small number of Green Belt exception sites that have been supported by S78 appeal inspectors, such as Shop Lane, Oaken – because they were aligned to the provisions

within the NPPF. Why therefore would this local plan take a different approach? We do not consider this is consistent with national policy.

Policy HC7 – Self & Custom Build Housing

- 2.32. The requirement to put Self Build dwelling plots on all major developments is onerous and the policy provides no certainty in terms of the level of provision, providing no reassurance to the Council, developers, or would-be self-builders. Providing self-build dwellings within a wider development provides significant health and safety concerns, introducing potential new contractors.
- 2.33. In addition, this policy does not recognise that self and custom builders are very unlikely to want to position themselves within a volume housebuilder site, so the uptake of these plots is likely to be poor. We consider that it would be a far better policy to allocate specific small plots to meet this need instead.

Policy HC9 – Design Requirements

- 2.34. Whilst the majority of this policy is supported, we do have concern about the requirement for 'Tree lined streets'. Whilst it is appreciated that this is a national requirement, it should be the role of the Local Plan to put 'meat on the bone' in terms of how this should be implemented. We would also question whether this has been discussed with the highways adoptions team.
- 2.35. Developers are also likely to have to contribute towards exorbitant maintenance fees, which will need to be factored into the plan viability. There should also be guidance in terms of which streets will be expected to be tree lined, and an appreciation for circumstances where this may not be appropriate because it is out of character, for example.
- 2.36. The policy introduces a requirement for a Design and Access Statement (DAS) to be submitted with every application. This seems onerous and would add unnecessary costs for householders proposing very minor applications, where the DAS is likely to add very little value in any event.

Policy HC11 – Space about dwellings and internal space standards

- 2.37. We suggest that some flexibility is added to this wording policy, perhaps to suggest that *most* development *should* meet NDSS. Affordable Housing providers do not want NDSS in some areas as the floor area can take them above local affordable housing price thresholds. The same can also be true for market homes, which can price out first time buyers. It can also lead to inefficient use of land and, depending on the mix (particularly in light of the policies proposed by this Plan to focus on homes with lower numbers of bedrooms), can make it challenging to achieve 35dph. This can also ultimately threaten site viability and therefore, deliverability.

Policy HC14 – Health Infrastructure

- 2.38. We consider, this policy should be amended to reflect the fact that new development should not be solving existing infrastructure problems.

Policy HC15 - Education

- 2.39. The second bullet point states that "new education infrastructure to be required from new development in line with the latest Staffordshire education infrastructure policy" (SEIP)
- 2.40. The SEIP advises that Staffordshire has a statutory duty to ensure there are sufficient school places for young people in residence in Staffordshire. Furthermore, if necessary, developer contributions will be sought to meet this need.

- 2.41. Fundamentally therefore, school capacity in any in any particular catchment area should not be an overriding constraint to development. However, due consideration will need to be given to the sustainability of school place provision. Arguably there are two primary elements to this:
- 1) The proximity of new housing provision to education facilities.
 - 2) The ongoing viability of school provision both in terms of funding and the availability of sufficient pupil numbers to support an educational establishment.
- 2.42. Dealing with the first of these elements it is noted that there is a high degree of commuting out of South Staffordshire and in the case of Perton this is predominately to the neighbouring authority of Wolverhampton. This in turn will inevitably produce a significant number of linked trips to both places of work and schools. We would contend that the site east of Wrottesley Park Road is not in an unsustainable location in terms of its proximity to educational facilities.
- 2.43. Turning to the second element, it is noted in the SEIP that sites of 750 or more dwellings would require a new, single form entry primary School to be provided. In this context the existing allocations and sites with planning permissions together with the safeguarded site in Perton provide a net addition of 376 dwellings but in total this would not be sufficient to warrant an additional primary school. Further detailed assessment would be required in terms of the existing provision within the catchment to accommodate this additional demand in a sustainable manner but with the addition of further development and notably the site east of Wrottesley Park Road, which has the capacity to develop deliver in the order of 600 new dwellings, a total of 976 additional units could be provided justifying the need for an additional primary School in the locality. This would not only be sustainable in terms of funding and viability but would also be delivered within close proximity to the demand from the additional housing.
- 2.44. The SEIP notes that the Education Act 1996 places a duty upon the local authority to make suitable travel arrangements free of charge to eligible children. It further defines at S.444 (5) that walking distances are 2 miles (3.2Km) for children under eight and 3 miles (4.8Km) for those who have attained eight years. These distances are measured by the shortest available walking route. Any travel distances in excess of these distances would require that South Staffordshire provide funding for free school transport and in such circumstances they would be able to seek contributions from new development sites.
- 2.45. It would therefore appear incongruous that within the Housing Site Selection Topic Paper (HSSTP), at paragraph 5.8.8, it is noted that the greenbelt parcels on the western and southern sides of Perton village (including site reference 238, land east of Wrottesley Park Road) are classified as having major constraints within the Sustainability Appraisal due to their remote location in relation to local schools. Furthermore, Appendix 3 of the HSSTP specifically identifies the site 238 as being at a distance of 2 km to the nearest education facility. This is clearly within the definition of walking distance defined by the Education Act.
- 2.46. Referring again to the Sustainability Appraisal dated August 21 prepared by Lepus Consulting; an education assessment methodology is provided based on target distances of 800m and 1.5 km for primary and secondary schools respectively. Whilst this is comfortably within the distances identified by the Education Act as recognised by the SEIP the SA gives the site to the east of Wrottesley Park Road an assessment of the highest negative score being a major negative impact to development and a key reason cited for the site's omission. We strongly disagree with the methodology applied in this instance and the resultant conclusions of the SA. An education travel isochrone map (and walking route to one high school in the vicinity) is attached by way of illustration at Appendix A of this document.

2.47. In conclusion Barberry Perton Ltd contend that using the simple and singular methodology of distance alone is an inadequate approach which is not Justified in terms of the Plan's preparation. Further criteria need to be assessed in detailing a sites sustainability in terms of education provision both in terms of available capacity of school places in the catchment area and the longer term viability of school provision both financially and in terms of pupil numbers.

Policy HC17 – Open Space

2.48. This policy creates a requirement for play provision to be provided automatically in all areas of development associated public open space. This would seem disproportionate, particularly for smaller sites and those in proximity to existing play facilities. This requires amendment or further justification. Provision should also relate to bed spaces and not number of units, to be proportionate. Proposed requirements for open space to be centrally located and contain play equipment should also be omitted, as the suitability and requirements for the open space should be assessed on a site specific basis, taking into account the site constraints and existing local provision.

Policy HC19 – Wider green infrastructure design principles

2.49. Whilst we support the need for good quality green infrastructure, the information provided within this policy is vague for such an advanced stage, this should be substantiated within the emerging local plan, rather than left for an SPD which may not be produced for some time.

2.50. We would also like further clarity as to whether provision of Open Space (HC17) and Sports Facilities and Playing Pitches (HC18) would qualify as green infrastructure within this policy. If not, this would represent an unduly onerous set infrastructure requirements.

Policy NB5 - Renewable and low carbon energy generation

2.51. Whilst the aims of this policy are clearly laudable, the omission of energy storage as a strategic policy is something that requires addressing in the local plan. Energy storage is crucial in the transition towards renewable forms of energy generation, because unlike fossil fuelled power stations which can be turned on and off like a tap, the way renewable energy is generated can rarely be controlled; it is intermittent and unpredictable.

2.52. With battery technology, energy can be stored during times of high production, and then discharged when demand is at its peak, when the grid becomes strained. This becomes even more important because the peaks and troughs of renewable energy generation and energy demand do not overlap when using renewable sources, so this is a crucial way of balancing the grid.

2.53. The importance of energy storage has been recognised by National Government in recent years, as battery storage technologies have advanced and become more viable. If electric car charging points (as planned for all new homes from 2025) and a move away from the use of gas in domestic settings happens in the short term, national grid capacity must be increased and this local plan should have a policy to cover this.

Policy NB7 - Managing flood risk, sustainable drainage systems & water quality

2.54. National policy dictates that a Flood Risk Assessment (FRA) should be provided for all development in Flood Zone 2 and 3, and on sites over 1ha in Flood Zone 1 (see footnote 55 of the Framework¹). Therefore, it is unclear why this policy is seeking to request an FRA on all major

¹ [National Planning Policy Framework \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk)

sites. Whilst we would agree to the provision of a drainage strategy on all major sites, we disagree with an automatic requirement for a FRA. This would appear another onerous requirement.

- 2.55. We agree with the importance placed on providing SuDS, but we disagree that all major developments should provide them. Brownfield sites, for example, may struggle with this requirement and risks stymieing the drive towards any 'brownfield first' approach.

3. THE SITE AND PROPOSALS: LAND TO THE EAST OF WROTTESLEY PARK ROAD, PERTON

- 3.1. The site is a large land parcel located directly to the south of Perton, which could deliver 600 new market and affordable homes and large areas of new green infrastructure (and biodiversity net gain), as well as other public benefits within the first 5 years of the next South Staffordshire plan period, without the need for major infrastructure investment.

Previous Representations

- 3.2. Having already submitted a Masterplanning Report for the site we have demonstrated the capacity for the site, whilst incorporating the necessary open space, linkages, surface water drainage and so on. The proposed masterplan is strongly landscape-led, incorporating significant LVA work, which provides a strong justification for the release of the site from the Green Belt.
- 3.3. The site (reference 238) has now been omitted as an allocation for Perton in the Preferred Options document and we strongly object to this.
- 3.4. In considering the content of the Lepus Consulting Interim SA dated August 2021 (Appendix F) (F63) the subject site (at bullet point 4) would have:
- 3.5. *"... major negative impacts predicted against the landscape criteria in the sustainability appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the association of Black Country Authorities proposed use of the Green Belt/Landscape Evidence Base as set out in Duty to Co-operate correspondence"*

The Green Belt Evidence: Settlement Coalescence

- 3.6. Making further reference to Appendix F of the SA – the final bullet point notes potential coalescence of Wolverhampton urban area and Perton. As we know from NPPF Para 138 b) one of the five Green Belt purposes is to prevent towns merging into one another.
- 3.7. Indeed, at the Issues and Options stage, the coalescence of Wolverhampton and Perton is seen in the council's evidence base has having already taken place.
- 3.8. This is reinforced at paragraph 3.15 of the South Staffordshire Green Belt Study (Stage 1 and 2) (July 2019)² which informs the preparation of the emerging Local Plan. Here, it states:

'Figure 3.1 indicates the area that has been identified as the West Midlands conurbation, which is defined as the main 'large built-up area' to which Purpose 1 relates. It includes those settlement areas deemed close enough to the 'core' urban area for development associated with them to be considered to be part of the 'large built-up area', including the towns of Aldridge and Brownhills and other settlements including Pelsall, Rushall, Shelfield, Tettenhall and Perton. The village of Bilbrook (contiguous with Codsall) is considered to have slightly stronger separation from the main built-up area of Wolverhampton than, for example nearby Perton, in terms of physical distance, the role of landscape elements (the River Penk) in creating distinction, and the historic development of the settlement area ('new' Perton has only developed since the 1970's). There is

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<https://www.sstaffs.gov.uk/doc/181123/name/South%20Staffs%20GB%20Stage%201%20and%202%20Report%20FINAL%20v1%20-%20web%20copy.pdf/>

sufficient contiguity between Cheslyn Hay, Great Wyrley and Cannock and Hednesford for these to be considered a single urban area which, in terms of its overall size, is also large enough to constitute a separate large built-up area.'

3.9. Interestingly, para 3.20 then goes on to state that:

'Although not a town in its own right, Perton is sufficiently close to Wolverhampton, for these settlements to be considered to constitute part of a town.'(sic)

3.10. This would point to the fact that Perton is effectively already seen as being amalgamated with Wolverhampton and therefore part of a 'town', rather than a town in its own right (it is, elsewhere within the Green Belt Review and other Local Plan evidence referred to as a village). We agree with this – given its relatively recent construction, Perton functions as a suburb of Wolverhampton rather than a self-contained settlement in its own right. So to dismiss the subject site as a potential allocation rather goes against the council's own evidence on whether it would constitute settlement coalescence, because we do not consider that it would.

3.11. This is further reinforced by Table 3.1, page 24 (ibid) where Perton is described as 'Perton as merged with Wolverhampton'. This surely undermines the role and function of the slim strip of Green Belt to the east and south of the site, as it no longer performs the strategic function that it should have or would have when originally designated:

Table 3.1: Settlements defined as Towns for Purpose 2

Towns within South Staffordshire	Neighbouring Authorities and Relevant Towns	
<ul style="list-style-type: none"> Cheslyn Hay together with Great Wyrley Perton as merged with Wolverhampton. 	Cannock Chase District Council	<ul style="list-style-type: none"> Cannock and Hednesford.
	City of Wolverhampton Council	<ul style="list-style-type: none"> Wolverhampton. Wednesfield.
	Telford & Wrekin Council	<ul style="list-style-type: none"> Telford.
	Dudley Borough Council	<ul style="list-style-type: none"> Brierley Hill. Dudley. Stourbridge. Halesowen.
	Shropshire Council	<ul style="list-style-type: none"> Bridgnorth. Shifnal. Albrighton.
	Lichfield District Council	<ul style="list-style-type: none"> Burntwood. Lichfield.

South Staffordshire SHMA 2021

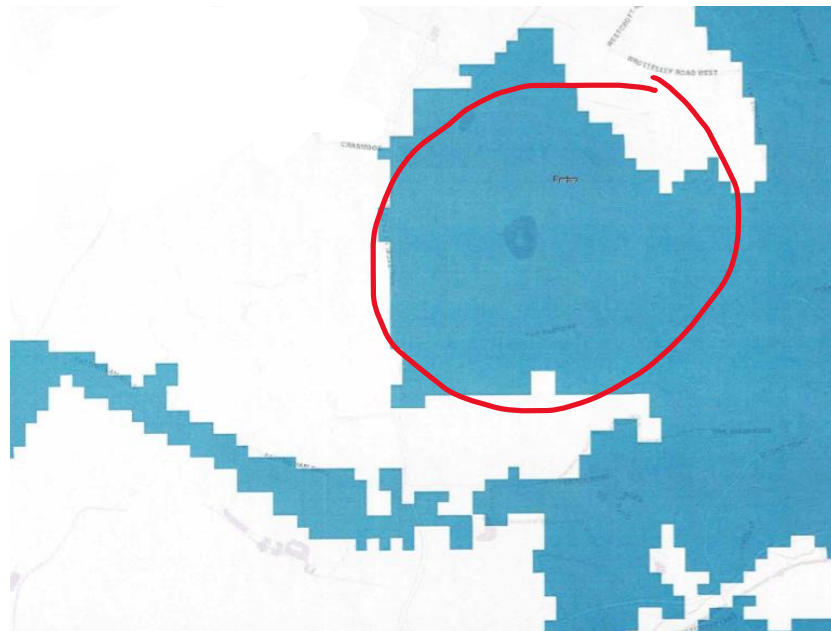
3.12. At 1.15 in the SHMA³ it is noted that Wolverhampton is the most common place of work for residents in South Staffordshire and that in excess of 10,000 people are going there for a job which represents 23.9% of South Staffordshire's population. This compares with only 20.7% of the resident population of South Staffordshire working within their own district. Clearly further allocations in South Staffordshire and in particular Perton, being on the boundary of Wolverhampton, would conform with a more sustainable pattern of commuting.

3.13. At 1.19 of the SHMA, under Migration Flows, it states that Wolverhampton takes the largest percentage of out-migration from South Staffordshire (14.7%) at 819 persons per annum. Similarly, the largest in migration to South Staffordshire is from Wolverhampton at 19.6%

³ <https://www.sstaffs.gov.uk/doc/182720/name/SHMA%202021%20-%20final%20report.pdf/>

or 1,178 persons and therefore provides a net inflow of 359 persons per annum ie: equivalent to approximately 163 new households, clearly Perton being on the edge of Wolverhampton should be recognised as a result of this through an additional housing allocation.

- 3.14. At Paragraph 1.23 of the SHMA – it is noted that South Staffordshire has the highest average house price in the HMA and by contrast Wolverhampton has the second lowest. A better commuting balance between the two authority areas would be achieved if this price differential was not as great.
- 3.15. At 4.14 of the SHMA (referring to the Standard Methodology) we note that Wolverhampton features on the list of the 19 largest urban areas and it is noted that whilst the city boundary identified in the ONS is partly within South Staffordshire, the overwhelming majority of the city is located in the Borough of Wolverhampton and the 35% uplift should therefore only be applied within Wolverhampton district and consequently no adjustment is required to the figure for South Staffordshire. From ONS data (reference: TCITY15CD: J01000109), the boundary for Wolverhampton as a “major city” for the purposes of the standard method calculation covers the majority of the urban area of Perton (circled in red). See map extract below:



- 3.16. We therefore believe that the council should consider allocating some of this 35% uplift within Perton and specifically on the subject site. It is the most sustainable option for growth where there are shorter pedestrian and cycle links to the centre of Perton and the main services and facilities located in Wolverhampton without necessitating the crossing of the busy orbital route to the west linking Holyhead Road to Bridgnorth Road.

The Greater Birmingham HMA Strategic Growth Study (2018)

- 3.17. At paragraph 4.9 we note that the GBHMA shortfall rises to 61,000 by 2036. Presumably the additional 4,000 units of unmet need that SStaffs are proposing to incorporate within this plan period, reflects this as the plan period will be to 2038. At para 4.11 it is seen in the evidence that a significant shortfall in housing is likely to remain in the GBHMA. We therefore believe there is a case to take more than 4,000 units of unmet need or the plan will contribute to perpetuating the housing crisis in the HMA.

- 3.18. In respect of para 4.12, it would be helpful to understand what exactly the Black Country Authorities feel about the 4,000 units and whether they genuinely feel that more could be done. It is in the public interest to make this known now as it is typical for neighbouring authorities to remain effectively silent on such matters, sadly as a result of the policy vacuum created by the withdrawal of the Regional Spatial Strategies which would have dealt with this issue in a more equitable and apolitical manner.
- 3.19. In terms of paragraph 4.39, we consider that there is a compelling need for housing as identified by the shortfall in Wolverhampton. This, in our view, significantly outweighs the highway concerns (which could be mitigated in any case, as demonstrated in our additional highways evidence which accompanies this representation), proximity to education and Green Belt/landscape sensitivities, for the reasons we give, in separate representations which will be submitted alongside this document.
- 3.20. It is also notable within the overall Black Country shortfall that 9,546 units are attributable to Wolverhampton. It is also noted that Wolverhampton (in the emerging Black Country Local Plan) have proposed and allocated the small parcel of land to the south eastern boundary of this site, which is a proposed release from the Green Belt. Clearly, from Wolverhampton City Council's perspective, the release of this site meets the test of exceptional circumstances. It is therefore confusing as to why the wider site (which falls into South Staffordshire) would not do the same if a consistent approach was being taken. We are therefore concerned that conversations under the Duty to Cooperate may not have taken place in this respect.

Other Related Matters

- 3.21. A separate representation is being submitted alongside this one, as prepared by the landscape consultant Lavigne Lonsdale that will add to the points already made in respect of the landscape impacts of releasing this site. This builds upon the Masterplan Report that was submitted originally.
- 3.22. Finally, further work has been undertaken by CTP in respect of locational sustainability and potential highway improvement works which could benefit the wider area. These representations are also submitted in parallel with this document and should be read together.

APPENDIX A – SCHOOLS MAP AND EXAMPLE WALKING ROUTE TO SCHOOL