

	<p>Local Plan Publication Stage Representation Form</p>	<p>Ref:</p> <p>(For official use only)</p>
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Name of the Local Plan to which this representation relates:

**South Staffordshire Council
Local Plan 2018 - 2039**

Please return to South Staffordshire Council BY 12 noon Friday 23 December 2022

This form has two parts –
 Part A – Personal Details: need only be completed once.
 Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

** If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

2. Agent's Details (if applicable)

Title	<input type="text"/>	<input type="text" value="Miss"/>
First Name	<input type="text"/>	<input type="text" value="Helen"/>
Last Name	<input type="text"/>	<input type="text" value="Lowe"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Associate Director"/>
Organisation (where relevant)	<input type="text" value="Tardis Environmental"/>	<input type="text" value="Stansgate Planning"/>
Address Line 1	<input type="text"/>	<input type="text" value="4 The Courtyard"/>
Line 2	<input type="text"/>	<input type="text" value="Timothy's Bridge Road"/>
Line 3	<input type="text"/>	<input type="text" value="Stratford-upon-Avon"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text" value="CV37 9NP"/>
Telephone Number	<input type="text"/>	<input type="text" value="01789 414097"/>
E-mail Address (where relevant)	<input type="text"/>	<input type="text" value="helen@stansgate.co.uk"/>

Part B – Please use a separate sheet for each representation

Name or Organisation: Stansgate Planning on behalf of Tardis Environmental

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is :

(1) Legally compliant	Yes	<input type="text" value="X"/>	No	<input type="text"/>
(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="X"/>
(3) Complies with the Duty to co-operate	Yes	<input type="text" value="X"/>	No	<input type="text"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The overall need to provide for a minimum of 9,089 new homes across the District during the Plan period is supported, however, the spatial strategy still places too much emphasis on a small number of larger sites (i.e. 300 of more homes). A greater number of smaller sites will ensure the deliverability of the required housing numbers within the Plan period, as large sites tend to have multiple owners, require significant infrastructure and take longer to masterplan, prepare, gain approval for and ultimate commence development on site.

The 9,089 new homes required, includes 4,000 homes to meet the needs of the wider market area, which are best met within close proximity and within easy access of the conurbation, from which the additional need arises. The site at Brownshore Lane, Essington provides a deliverable and developable location for a smaller site (around 200 homes) that could be brought forward to plug the gap in the short term whilst larger sites are progressing. The site (Reference 151/662) lies adjacent to the south eastern edge of Essington and is well placed to serve both Essington itself and also the adjacent conurbation, with local facilities in Willenhall being located approximately 1km from the centre of the site. The site was also formerly used for open cast mining, which has had an inevitable impact upon its overall character, form and landscape value.

Essington is currently allocated as a Tier 3 settlement, however, its facilities and services are such that it is better defined as a Tier 2 settlement. In addition, its proximity to the metropolitan areas of Willenhall and Wolverhampton dictate that a Tier 2 classification is more appropriate given its sustainable situation. The Landscape Sensitivity Study (2019) classes Essington as a 'Local Service Village', the second level of settlement within the hierarchy. The site has good access to facilities in Essington and Willenhall and is very well placed to assist in addressing the housing needs of the conurbation in a location suitable and desirable to those in housing need. There is no reasoned justification for the re-allocation of Essington as a Tier 3



settlement when it could provide an appropriate location for growth as part of the overall spatial strategy.

The Landscape Sensitivity Study (2019) also identifies the site, within parcel SL62, as having a low/moderate level of sensitivity. However, this study does not discuss the former mining use of the site, but does acknowledge that aspects of the landscape considered within the Sensitivity Study to have a more moderate level of harm (rather than a low level), do not form part of the proposed site (151/662) at Brownshore Lane. The Sensitivity Study refers to areas of woodland to the west of Brownshore Lane being of particular importance, along with Brownshore Lakes, these aspects give the overall area a low/moderate sensitivity rating, rather than a low sensitivity rating. These elements of importance would be fully retained and unimpacted by the proposed allocation of the site referenced 151/662. This part of parcel SL62 should therefore be classed as having a low landscape sensitivity.

At the current classification, the site at Brownshore Lane has a lower level of landscape sensitivity than the majority of other proposed sites around the border within the metropolitan area, and if this were to be appropriately reclassified as having low landscape sensitivity, the site would stand out as a clear preference.

A low landscape sensitivity, together with the highly sustainable location of the Brownshore Lane site (ref: 151/662) near to both Essington and the metropolitan area, and the facilities and services available within Essington, which should be classed as a Tier 2 settlement, show that the site is clearly appropriate for housing development and allocation.

Whilst the site is currently within the Green Belt and allocation would require its removal from the Green Belt. In accordance with the National Planning Policy Framework (NPPF) (2021), in order to release land from the Green Belt alternative brownfield sites need to have been considered and discounted. It is agreed that the Council, in preparing this Plan, have appropriately assessed all potential brownfield sites and have correctly concluded that insufficient land is available to meet the Plan requirements without recourse to revising Green Belt boundaries.

The landowner would welcome the opportunity to discuss potential Green Belt compensatory improvements with the Council or Inspector, in order to ensure that the allocation of the Brownshore Lane site complies with Paragraph 142 of the NPPF.

In summary, the Brownshore Lane site (site ref: 151/662) provides an excellent opportunity to allocate a deliverable site immediately adjoining Essington, which should be classed as a Tier 2 settlement, and in very close proximity to the border with Willenhall/Wolverhampton where the greatest need for additional housing arises. The allocation of site 151/662 would allow for a smaller site to be brought forward quickly to meet needs not met by longer term larger sites. Market demand suggests that the site is highly desirable to house builders and could therefore be delivered quickly. The site has a low landscape sensitivity as the more importance elements would be retained and unaffected.

There are no impediments to the delivery of development at the site for housing early within the Plan Period and it is anticipated that an application for planning permission would be made shortly after the site achieves formal allocation in an adopted Development Plan.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.



Essington should be reclassified as a Tier 2 settlement given the availability of services and facilities and recognition of the sustainable growth that Essington could deliver to assist with the overall delivery of housing to serve both South Staffordshire District and the wider Birmingham and Black Country areas.

Policy SA5 should be updated to include the Brownshore Lane site (151/662) as an allocation for around 200 homes on the edge of a Tier 2 settlement.

The above changes would enable the Plan to be found sound as they would show the appropriate assessment and categorisation of existing settlements, the recognition of the need to allocate sites within close proximity to the urban area of Willenhall/Wolverhampton to meet the unmet housing needs of the wider housing market area. The Brownshore Lane site has a low landscape sensitivity and its allocation would show that the plan has been positively prepared to enable both short and longer term delivery of housing sites to meet demand.

Please note: *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To respond to queries raised by the Inspector in connection with the reclassification of Essington as a Tier 2 settlement and in connection with the availability, deliverability and sustainability of the Brownshore Lane site (site ref: 151/662).

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However, your contact details will not be published.

Data Protection

Your details will be added to our Local Plans Consultation database so that we can contact you as the review progresses. South Staffordshire Council will process your personal data in accordance with the Data Protection Act 2018 and the General Data Protection Regulations (GDPR). Our Privacy Notice can be viewed at <https://www.sstaffs.gov.uk/planning/strategic-planning--data-protection.cfm>

Please return the form via email to localplans@sstaffs.gov.uk or by post to South Staffordshire Council, Community Hub, Wolverhampton Road, Codsall, South Staffordshire WV8 1PX