

	<h2 style="margin: 0;">Local Plan</h2> <h3 style="margin: 0;">Publication Stage</h3> <h3 style="margin: 0;">Representation Form</h3>	<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)

<p>Title <input style="width: 90%;" type="text"/></p> <p>First Name <input style="width: 90%;" type="text"/></p> <p>Last Name <input style="width: 90%;" type="text"/></p> <p>Job Title (where relevant) <input style="width: 90%;" type="text"/></p> <p>Organisation (where relevant) <input style="width: 90%;" type="text" value="Payne Hicks Beach Trust Corporation Limited"/></p> <p>Address Line 1 <input style="width: 90%;" type="text"/></p> <p>Line 2 <input style="width: 90%;" type="text"/></p> <p>Line 3 <input style="width: 90%;" type="text"/></p> <p>Line 4 <input style="width: 90%;" type="text"/></p> <p>Post Code <input style="width: 90%;" type="text"/></p> <p>Telephone Number <input style="width: 90%;" type="text"/></p> <p>E-mail Address <input style="width: 90%;" type="text"/></p>	<p><input style="width: 90%;" type="text" value="Miss"/></p> <p><input style="width: 90%;" type="text" value="Helen"/></p> <p><input style="width: 90%;" type="text" value="Lowe"/></p> <p><input style="width: 90%;" type="text" value="Associate Director"/></p> <p><input style="width: 90%;" type="text" value="Stansgate Planning"/></p> <p><input style="width: 90%;" type="text" value="4 The Courtyard"/></p> <p><input style="width: 90%;" type="text" value="Timothy's Bridge Road"/></p> <p><input style="width: 90%;" type="text" value="Stratford-upon-Avon"/></p> <p><input style="width: 90%;" type="text"/></p> <p><input style="width: 90%;" type="text" value="CV37 9NP"/></p> <p><input style="width: 90%;" type="text" value="01789 414097"/></p> <p><input style="width: 90%;" type="text" value="helen@stansgate.co.uk"/></p>
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(where relevant)

Part B – Please use a separate sheet for each representation

Name or Organisation: Stansgate Planning on behalf of Payne Hicks Beach Trust Corporation Limited

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

Paragraph	Page 210 – Appendix C	Policy	SA5	Policies Map	Sites 284 & 463
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4. Do you consider the Local Plan is :

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

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 strategy within the Local Plan Review is supported and the need to provide for a minimum of 9,089 new homes across the District, including 4,000 homes to meet the needs of the wider market area, is appropriate following the application of the standard methodology and the up-to-date Strategic Housing Market Assessment. The reliance on a considerable number of both large scale and smaller sites provides the best strategy to ensure the deliverability of the required housing numbers.

The site (Housing Allocation Sites 284 & 463), known as land off Billy Buns Lane/Gilbert Lane, Wombourne, is located to the eastern edge of Wombourne in a highly sustainable and easily accessible position. Wombourne is appropriately recognised as the largest Tier 2 settlement within the District, as well as the largest settlement within the south of the District, and is therefore identified for growth both on safeguarded land and also additional growth around the village.

The centre of the sites lie within easy walking distance of existing public transport opportunities, education facilities and the village centre. Both allocated sites 284 and 463 were assessed within the Housing Site Selection Topic Paper 2021 and 2022 as performing better than other sites and being able to deliver the Council's preferred spatial strategy. The two sites together have been assessed as providing the highly suitable options for growth around the village given their proximity to services, unconstrained nature and lower levels of Green Belt harm.

The allocation of the site necessitates its removal from the Green Belt. It has been evidenced that there is insufficient non Green Belt land available within the District to accommodate the anticipated housing needs over the Plan period. Alternative brownfield sites have been considered and



discounted due to their continued operation for other important uses. The 2019 Green Belt Study identifies the majority of the site lying within parcel S72Bs3, which has a low-moderate harm rating. The site also scores highly in terms of its sustainability with good access to education facilities and regular bus routes into the Black Country, as stated to be a first consideration by Paragraph 142 of the National Planning Policy Framework (2021) (NPPF).

Paragraph 142 of the NPPF also seeks ways in which impacts of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. A specific Green Belt compensatory proposal has been agreed with officers in respect of the Billy Buns Lane/Gilbert Lane site that will create a new formalised walking route around an adjacent field to the north west of the site where there is existing evidence of a unofficial route. This route could be connected to the allocated site and dedicated as a public right of way.

The new public right of way would have an average width of around 5m and extend over approximately 1.17 miles (1.9km) in length. It is also proposed to enhance the woodland edge to the field along a stretch approximately 1km in length, through the planting of native species shrubs, such as holly, hazel, hawthorn, dogwood, blackthorn, elder and field maple, amounting to between 1,000 – 2,000 additional plants.

The allocation of the site would not result in any loss of employment, as the existing agricultural tenancy will be offered suitable alternative land and facilities within the local area. Furthermore, the Economic Development Needs Assessment shows that the Wombourne area (Locality 5) contains approximately 22% of the District's employment, suggesting that there are good levels of local employment opportunities for future residents without having to commute longer distances. This adds to the sustainability of the site.

Initial drainage and highway assessment works have been undertaken in respect of the allocation and confirm that appropriate improvements, brought about as part of the development of the site, would relieve existing localised road flooding and provide highway layout improvements to the northern end of the site. An appropriately designed drainage strategy and improvements to the priority junction of Billy Buns Lane and Smallbrook Lane will form part of the development of this allocated site.

The allocation at Billy Buns Lane/Gilbert Lane will allow for an appropriate extension to Wombourne to greatly assist in the delivery of the assessed housing need for the District. The Plan has been appropriately positively prepared and has duly met the required duty to cooperate with neighbouring authorities in order to meet the overall housing need for the Housing Market Area. The Plan is therefore considered to be sound and meet the necessary legal tests.

There are no impediments to the delivery of development at the site for its allocated purpose 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.

N/A



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)

Available to participate at the Inspector's discretion

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:

Available to participate if the Inspector wishes to clarify any matters relating to the proposed allocation of Sites 284 and 463.

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