

Local Plan Preferred Options Consultation 2021

Land at Westcroft Road, Perton

Prepared on behalf of Landowners

30 November 2021

Public

KF Ref: 1205

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1. Introduction

- 1.1 Knight Frank have prepared these representations on behalf of Mr Lacon and family, who hold a freehold interest regarding land East of Perton ("land at Westcroft Road"). The land ownership identified within the attached Site Location Plan is proposed as a suitable location to deliver circa 140 residential homes. The site is referred to as Land off Westcroft Road (reference: 506) in the Councils Strategic Housing Land Availability Assessment (2021).
- 1.2 The site offers a unique opportunity for a genuinely residential-led and sustainably connected new neighbourhood that integrates the site with the existing settlement edge, open space and wider employment opportunities. The site provides an opportunity to create synergies between the existing sustainable credentials of the location and the site as residential development. It also provides an opportunity to deliver much-needed development on land within proximity to the Black Country Authority.
- 1.3 These representations are made in response to the South Staffordshire Council Preferred Options stage of the Local Plan (November 2021), which sets out proposed sites for housing, employment and revised planning policies and policy direction.
- 1.4 In accordance with Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the requirement to update the Local Development Plan, our client welcomes the update of the South Staffordshire Council Preferred Options consultation documentation. The new Local Plan should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for various forms of development, infrastructure and community facilities, including for the conservation and enhancement of the natural, built and historic environment. In accordance with paragraph 35 of the NPPF the Local Plan needs to be:
- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.
- 1.5 Section 19 (1B) of the Planning and Compulsory Purchase Act 2004 requires the local authorities to identify its strategic priorities for the development and use of land in its area. While S19 relates to the preparation of the Plan, the wording of the legislation makes it clear that it is for the Local Planning Authority to identify their strategic priorities. As such, the opportunity to comment on the key issue and options identified at this stage in the plan-making process is welcome.
- 1.6 These representations are structured as follows:
- Chapter 1: Site Location and Context
 - Chapter 2: Site Suitability, Availability and Achievability
 - Chapter 3: Main Representations - Responses to Questions Posed in the Preferred Options Consultation Document (November 2021)
 - Chapter 4: Conclusion

2. The Site and Context

- 2.1 The site is located on the eastern edge of Perton and is currently accessed via Westcroft Road. It comprises 7.28 hectares (17.99 acres) of agricultural land, which is currently located in the Green Belt. The site is contained by Westcroft Road and a boundary hedge line to the north. The sites eastern, western and southern boundaries are also defined by semi-mature trees and boundary hedge lines. Beyond this to the south, the sites south-western boundary is further defined by Dippons Lane, which connects the urban area of Perton via a cycle and footway to the boundary of the site and the wider countryside.
- 2.2 The land is located between the settlement areas of Perton and Tettenhall. This wider undeveloped area of land is contained by existing residential development to the south, east and west. To the north agricultural land is contained by the River Penk and Wrottesley Park. As such, the wider agricultural land and countryside is wholly contained by natural landscape features or existing development. The surrounding landscape is divided by trees and hedge lines and the presence of these softens the transition between existing development and the wider landscape. In future, the existing landscape features will naturally prevent the sprawl of development in this location and assist in maintaining the rural character of the north-eastern edge of Perton.

Access

- 2.3 There are a variety of options available to secure sustainable access to the site. This includes access from Idonia Road via a pre-agreed option with existing landowners adjacent to the site boundary. An agreement of this nature would assist with connecting the existing urban edge with the subject site and proposed development. Secondary access is available along Westcroft Road, connecting to Yew Tree Lane. This route could be formalised as a one-way connection allowing traffic to travel freely between the eastern settlement edge of Perton and Tettenhall. In addition, the site is located within 600metres of both the local Public Rights of Way network and Cycle network.
- 2.4 The site is located in Perton, a sustainable location and identified as a 'main service village' within the Council's adopted Core Strategy. The village centre includes a large Sainsbury's supermarket, a library, post office, and civic centre, health facilities together with smaller retailers, public houses and cafes. All of these services are within circa 0.5 miles (10-minute walk) from the proposed site.
- 2.5 In addition, the site benefits from access to a variety of educational institutions. Including, Woodthorne Primary School, The Kings Church of England School, Tettenhall Wood School, Perton Primary Academy, and Perton Firsts School. All of these facilities are within 2000metres of the sites boundary.
- 2.6 The site benefits from access to bus stops located at the Pkwy. Services 10 and 10A provide access to Wolverhampton, Pattingham and Codsall. The services are as frequent as every 20 minutes Monday-Friday and provide access to local centres in between. Codsall Railway station is the nearest railway station to the proposed development site. The station is located approximately 2.1 miles (3.38 kilometres) north of the development site and provides rail services to Shrewsbury, Wolverhampton, and Birmingham New Street. Bilbrook Railway station offers an alternative access point for railway services for the proposed development site and is located approximately 2.92 miles (4.7 kilometres) to the north of the site. Rail services are available from the platform to Shrewsbury, Wolverhampton, and Birmingham New Street.

Designations

- 2.7 There are no listed buildings or locally listed buildings located on the site. The site is not within a Conservation Area.
- 2.8 The site is not subject to any statutory ecological or landscape designations. However, the site is located within the Green Belt but is immediately adjacent to the existing settlement boundary and performs limited functions intended by the National Planning Policy Framework in regard to this land designation.

Flooding

- 2.9 According to the Environment Agency's flood risk mapping, the site is located within Flood Zone 1 (lowest risk of flooding).

Proposed Development

- 2.10 The site has capacity for up to 140 homes (C3), new affordable homes, or alternatively, extra care (C2). Future development on the site would allow for:
- Associated infrastructure and green space;
 - Attenuation ponds;
 - Access to the site via Idonia Road, and secondary access of Westcroft Road;

- Pedestrian and cycle access to be provided which will create linkages between the site, Perton, and Tettenhall to the east;
- Any necessary ecological buffers along the boundaries of the site meeting the hedgerows and belts of woodland; and;
- New defendable Green Belt boundaries to the east and north of the site.

3. Site Suitability, Availability and Achievability

- 3.1 This section sets out the suitability, achievability and availability of the site to support its future allocation for residential development. Based on the work carried out to date, it has been concluded that there are no unresolvable technical constraints to the site that could not be adequately mitigated or would preclude the site from development.

Suitability

Sustainability and Climate Change

- 3.2 Perton is considered to be a tier 2 settlement benefiting from access to a range of services and facilities, including those that have been identified in Section 2 of this report. In the previous Core Strategy, Perton was considered to be a Main Service Village. Whilst the village does not have immediate access to rail services it is within close proximity to Codsall and Bilbrook. The Councils Rural Services and Facilities 2021 identifies that Perton is in the top 16% of settlements boasting the most sustainable access to services and facilities.
- 3.3 The Council's commitment to achieving net zero is supported and actively encouraged. In July 2019, the Council declared a climate change emergency to achieve net zero emissions by 2050 across every aspect of service provision and estate. To enable a transition towards meeting these targets the local authority will need to ensure that homes are located adjacent to existing sustainable transport infrastructure and facilities, maximising the use of public transport and other sustainable modes. Also, ensuring that new developments delivered are suitably designed to reduce energy consumption and promote the use of renewable energies.
- 3.4 It is vitally important to ensure that the Local Plan addresses and mitigates the impacts of Climate Change. Perhaps of most importance to achieving this aim is to ensure that the Plan encapsulates the most sustainable patterns and distribution of development across the district. This means focussing new development on land near the existing built form and in this case the urban centre of Perton. The site is in an accessible location and a housing development proposal would have suitable connectivity to employment and wider essential services, whilst also being able to contribute further through associated planning obligations.
- 3.5 Allowing the delivery of the identified site as a Local Plan allocation would meet several sustainability criteria:
- The site is a sustainable location for new homes, benefiting from a good bus, bicycle and pedestrian links to key local services, facilities and employment opportunities, encouraging a modal shift away from private car use;
 - There is ample public open space available near the site and proposed to be included as part of the development;
 - The site is within easy walking and cycling distance to several local primary and secondary schools;
 - Development would improve connectivity to the residential development to the east and west through potential enhancements in the form of pedestrian and cycle paths. This could include the provision of a new footway and other pedestrian infrastructure; and
 - Availability of surrounding land not suitable for development to be included in the Local Plan for biodiversity net gain and open space.

Green Belt

- 3.6 The need for the Council to allocate land within the Green Belt is fully supported. Land allocation should be undertaken against the backdrop of the Council having declared a Climate Emergency. The 'exceptional circumstances' for releasing land from the Green Belt should accordingly be based upon locations that have the greatest locational sustainability and accessibility credentials. These being sites with good access to a range of services and facilities, including employment and those areas with the greatest housing need. It should also be based upon those sites where harm can be mitigated and sustainable access, biodiversity net gain and ecological enhancements can be made to the new Green Belt boundary.
- 3.7 The Councils approach in assessing the settlements based on their sustainability and access to services and facilities is supported, rather than location within the Green Belt. The Council needs to determine which settlements are the most sustainable and capable of accommodating sustainable growth. The evidence has indicated Perton as a sustainable settlement, which supports the de-allocation of land at Westcroft Road from the Green Belt, particularly where design mitigation can assist in mitigating impacts on the surrounding landscape and Green Belt.
- 3.8 This site is contained by the inset settlements of Perton and Tettenhall Wood, and the constrained Wrottesley Park SBI. The allocation of land in this location would have a negligible impact on the wider Green Belt. The allocation

of non-strategic growth in this location would limit impact and the surrounding land would continue to provide the necessary purpose of including land within the Green Belt. In terms of the visual aspect of contribution to the Green Belt, the Site itself has a limited visual relationship to the wider Green Belt, owing to the existing containment contributed by the above factors.

- 3.9 The site makes a limited contribution to the purposes of the Green Belt. Whilst it is currently open land, it is subject to existing urbanising influences and is more closely associated with the existing urban area than with the wider landscape, from which it is robustly contained by substantial structural vegetation. This vegetation is one of a number of structural factors that contributes to the perception of separation between Perton and Tettenhall. Residential development of the Site would have a limited effect on this perception.
- 3.10 Strategic green infrastructure can be incorporated into the design to complement and reinforce the role of the existing wooded enclosure of the Site in mitigating the limited harm to the Green Belt that would result from the Proposed Development. Sensitive design could provide structural diversity and visual interest; facilitating further appropriate access from the residential area to the surrounding Community Wood and further Green Belt land; and maintaining a perceptual connection with the distinctive wider landscape at short-medium distances to the north and east, through sensitively arranged visual corridors.
- 3.11 When considered against the safeguarded land to the west of Perton, the site can remain contained and minimise the impact of development on the wider landscape and long-distance views. This should be taken into account when considering the contribution the site makes to the Green Belt and its future de-allocation. The Councils Green Belt assessment should look at individual parcels as well as representative cells. An assessment is provided below for the subject site:

Table 1: Green Belt Assessment

Purpose	Commentary	Contribution
1. Check the unrestricted sprawl of large built-up areas.	<p>The Site is closely associated with the existing extent of the built up area of Perton and is robustly contained from the wider landscape by physical features in the form of Westcroft Road and defensible boundaries comprising mature and semi-mature trees.</p> <p>The Local Plan has identified the need for additional housing land, and therefore the sprawl of sustainable settlements is inevitable due to the absence of brownfield land.</p>	Limited
2. to prevent neighbouring towns merging into one another;	<p>The Site constitutes a small parcel on the east of Perton where there is physical, visual and perceptual separation of the settlement of Tettenhall to the east.</p> <p>This separation is achieved by: blocks and belts of woodland; open fields in the wider landscape to the east of the Site.</p>	Limited
3. to assist in safeguarding the countryside from encroachment;	Whilst there is only limited equestrian infrastructure within the Site and therefore, it is essentially open, the Site is subject to immediately adjacent urbanising influence which diminishes its rural character.	Some Contribution
4. to preserve the setting and special character of historic towns;	The Site is separated from any heritage assets by extensive built form within Perton, landform and vegetation; and has no visual, physical or apparent character relationship with it. As such the Site makes no contribution to the setting and special character of a historic town.	None

- 3.12 Based on the above considerations, overall the site is considered to make a limited contribution to the purposes of the Green Belt. Whilst it is currently open land, it is subject to existing urbanising influences and is more closely associated with the existing urban area than with the wider landscape, from which it is robustly contained by substantial structural vegetation. This vegetation is one of a number of structural factors that make a contribution

to the perception of separation between Perton and Tettenhall. Residential development of the site would have limited effect on this perception.

Availability and Achievability

- 3.13 The availability and achievability of development on the site can be summarised as follows:
- The entirety of the site is under the control through a single landownership and is therefore in single positive control with no legal or land ownership co-ordination issues to overcome. It is therefore available immediately should the emerging planning policy position allow for it;
 - Desk-top technical assessments in environmental, landscape and drainage and flooding have been undertaken and no unresolvable constraints have been found;
 - The site is fundamentally deliverable – being a greenfield site unencumbered by any significant technical planning constraints;
 - The site can be delivered as a whole, depending on the Councils considerations as to the level of housing need and amount of housing that meets sustainable growth at Perton; and
 - The site is sustainable and deliverable as a residential, community lead mixed-use development site.

4. Main Representations

- 4.1 In making comments and answering specific questions posed by the consultation, these representations provide a response that will assist South Staffordshire Council in meeting the requirements for plan making as set out in the National Planning Policy Framework (NPPF), tests of soundness and the duty to co-operate, both its legal and procedural requirements.

Question 1 - Do you agree that the evidence base set out in Appendix A is appropriate to inform the new Local Plan? Yes/No

- 4.2 The Local Plan should be based on robust evidence gathering to inform strategic policies and the development strategy. It is important to ensure that all of these documents are up to date and are prepared in accordance with the NPPF and National Planning Policy Guidance (NPPG). The supporting evidence should ensure that the Local Plan and evidence supporting this is positively prepared, justified, effective and consistent with national policy to ensure that the strategic policies in the Local Plan are found sound.
- 4.3 Reference is made in the Councils Duty to Co-operate Paper (2021) to the Greater Birmingham Housing Market Area (GBHMA) Growth Study 2018 to determine the current contributions to unmet GBHMA housing needs. The Council state that since 2017, the first consultation on the Black Country's emerging Draft Plan established an unmet need of 21,670 dwellings, which the most recent (August 2021) Draft Plan consultation now indicates it has risen to 28,239 dwellings, despite some emerging Green Belt release. The 6,569 dwelling increase is significant to the South Staffordshire Local plan and its soundness. It is clear that in this instance the use of a document produced in 2018 cannot be relied upon to establish the contribution made by South Staffordshire against the GBHMA unmet need.
- 4.4 Planning policy encourages joint working and common ground should be reached on the total unmet need in accordance with the NPPF paragraph 66. As such, the evidence base should be updated to reflect the most recent findings from the Black Country's Draft Plan consultation (August 2021).

Question 3 – (A) Have the correct vision and strategic objectives been identified?

(B) Do you agree that the draft policies (Chapters 4 and 5) and the policy directions (Chapter 6) will deliver these objectives?

- 4.5 The vision and strategic objectives identified by South Staffordshire Council and set out in the Local Plan are suitable in principal. However, the absence of any additional land allocated for development in Perton does not correspond to the strategic objectives identified to date.

Strategic Objective 2: Meet the housing needs of the district whilst making a proportionate contribution towards the unmet needs of Great Birmingham Housing Market Area. New development will be focused on sustainable locations within the district, either within or adjacent to the district's key villages or through urban extensions adjacent to neighbouring towns and cities.

- 4.6 It is encouraged that a review of the proposed housing target of 8,881 dwellings is undertaken to ensure it is sufficient to meet the needs of both South Staffordshire and the unmet needs of the GBHMA. NPPG states that, the Local Housing Need (LHN) figure is calculated at the start of the plan-making process however this number should be kept under review until the Local Plan is submitted for examination and revised when appropriate (ID 2a-008-20190220).
- 4.7 As set out in the 2021 NPPF, strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need and any needs that cannot be met within neighbouring areas can be met over the plan period (para 66). The determination of the minimum number of homes needed should be informed by a LHN assessment using the Government's standard methodology unless exceptional circumstances justify an alternative approach (para 61).
- 4.8 The NPPG explains that "circumstances" may exist to justify a figure higher than the minimum standard method figure. The "circumstances" for increasing the minimum LHN are listed in the NPPG including, but not limited to, situations where increases in housing need are likely to exceed past trends because of growth strategies, strategic infrastructure improvements, agreeing to meet unmet need from neighbouring authorities or previous levels of housing delivery/assessments of need, which are significantly greater than the outcome from the standard methodology (ID 2a-010-2001216). As such, the Councils commitment to deliver 4000 homes from the Birmingham Housing Market Area is broadly supported. However, the un-met housing need figure needs to be reviewed in light of new evidence from the Black Country's Draft Plan consultation (August 2021), which demonstrates a great unmet need. These are considered to be exceptional circumstances that warrant the adoption of a higher housing delivery requirement in South Staffordshire.

- 4.9 It is considered that further investigation into the circumstances which state a diversion from the minimum housing requirement should be under review and it is necessary to understand whether these circumstances will further exist resulting in the need for development beyond the number of dwellings proposed. We agree with the strategic objective to assist neighbouring authorities meet their housing needs, but this should be explored further to ensure the delivery of housing is consistently achieved throughout the plan period. To do this in a justified and effective manner the Council should continue to review the updated evidence base of those Councils reviewing their Local Plans and LHN's within the Greater Birmingham Housing Market Area. As mentioned in the Councils Local Plan Preferred Options Consultation Document, new evidence including the Black Country Urban Capacity Review (2021), all of which should be factored into the OAN as the plan is developed. South Staffordshire and the Black Country authorities are yet to have their Objectively Assessed Housing needs tested under examination. As these authorities are neighbouring and functionally related to the greater Birmingham Housing Market area it is fundamental that agreement is made regarding unmet need as these Local Plans are examined. The Local Plan submission and draft should be accompanied by a Statement of Common Ground signed by all relevant parties.
- 4.10 Evidence submitted as part of the Draft Black Country Plan consultation suggests that there will remain a significant shortfall of housing in the Greater Birmingham Housing Market Area. In light of this, additional housing should be allocated at Perton as a sustainable location for new housing. The settlement can support both strategic and non-strategic housing allocations and it is encouraged that the Council review the spatial strategy to ensure opportunities for housing allocations are maximised. The Council's overall Housing Land Supply should include a short and long-term supply of sites by the identification of both strategic and non-strategic allocations for residential development.
- 4.11 The Black Country Development Strategy 2020 – 2039 expects the shortfall of 28,239 dwellings to be exported through the Duty to Cooperate. The Draft BCP proposes to meet only 63% of minimum LHN of the Black Country. In addition to this, the Birmingham Development Plan adopted in January 2017 identified an unmet housing need of 37,900 dwellings. The level of unmet need in the part of the GBHMA is severe and therefore South Staffordshire should work proactively with these authorities to ensure that additional housing and employment land is provided. Ensuring that levels of housing are sufficiently met will be of particular importance to ensure that the Local Plan is found sound. It is not encouraging to understand that other Local Authorities in the GBHMA are adopting alternative methods to assist in developing their OAN. The current piecemeal approach of independently preparing separate statements of common grounds between individual authorities during the preparation of each Local Plan is unacceptable and provides no certainty that unmet housing needs will be met. The approach should be holistic, justified and evidenced and positively prepared.
- 4.12 The Councils previously preferred development strategy identified Perton as a sustainable location for further housing development and safeguarded housing development land allocation. The Council's detailed sustainability appraisal should identify sites that can have an opportunity to have a significantly positive effect on climate change mitigation and adaptation. The Council have an opportunity to allocate land both strategic land and non-strategic that closely follows the principles of the 15-minute neighbourhood. The 15-minute neighbourhood involves a menu of policy requirements that provides residents access to most, if not all, of their needs within a short walk or bike ride from their home. The neighbourhood is based upon four pillars - proximity, diversity, density and ubiquity. 15-minute policies transform urban spaces into connected and self-sufficient (or 'complete') neighbourhoods. The 15-minute neighbourhood serves as an organising principle for urban development and urban life that makes life more liveable for residents by improving air quality and making neighbourhoods safer, quieter, more diverse, inclusive and economically vibrant.
- 4.13 The Rural Services and Facilities Audit 2021 identifies Perton as the eighth-most sustainable settlement in the district out of a total of 48 assessed. These settlement characteristics and credentials should not be ignored when considering the allocation of land to meet the needs of particular settlements, and to meet the Councils wider objectives including delivering affordable housing to meet local needs, meeting the housing needs of the ageing population and providing specialist housing, ensuring access to a good range of health services as well as sport, leisure and recreational facilities, making a positive contribution to health and wellbeing of residents, and planning for climate change.
- 4.14 In light of the above, the policies contained in the Preferred Options consultation document currently do not deliver the strategic objectives identified due to the absence of further development allocation at Perton to meet the wider and local housing need.

Question 4 – Do you support the policy approach in Policy DS1 – Green Belt and Policy DS2 – Open Countryside

- 4.15 Additional land should be released from the Green Belt at Perton to ensure a sustainable and future growth strategy is accommodated early in the Plan period. The further allocation of non-strategic sites for development will ensure sufficient flexibility to allow for growth at the most sustainable Green Belt towns, including Tier 1 and 2 settlements. There has been an absence of additional land allocated at Perton and this makes it a suitable appropriate settlement to accommodate non-strategic growth.

- 4.16 As stated above, it is encouraged that the Council review their housing requirement to assist in meeting the unmet housing needs in the GBHMA to ensure that this is consistent with other authorities and the level of housing and provided for adjacent authorities is transparent. As set out in 2021 NPPF, where fully evidenced and justified Green Belt boundaries can be altered in "exceptional circumstances" through the preparation or updating of Local Plans (paras 140 & 141). Paragraph 141 also states that the release of land from the Green Belt should be evidence and demonstrated by examining fully all other reasonable options for meeting its identified need for development. Due to the piecemeal approach adopted by adjacent authorities in assessing the OAN, the need for development has not been fully examined, evidenced and justified in this instance, and further land may be required because of new information.
- 4.17 The approach to the proposed release of Green Belt generally across the district is supported owing to the fact that the Green Belt boundary is drawn tightly around the urban edges of main towns. It is important that sufficient land is allocated at this early stage in the plan-making process to avoid delays in housing delivery later in the plan period. The preferred policy approach does not demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period by the identification of areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period as set out in the NPPF (para 143c & 143e). The absence of additional land allocation to meet the development needs at Perton potentially undermines the permanence of the Green Belt boundaries in the long term, contrary to the NPPF.

Question 5 – Do you support the policy approach in Policy DS3 – The Spatial Strategy to 2038?

- 4.18 The opportunity to be able to comment further on the proposed spatial strategy is welcomed. Comments have been made in regards to the absence of future planned development at Perton. As stated in Policy DS3, an integral part of the Strategy will be 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, whilst also recognising that very limited growth in less sustainable areas may be appropriate in limited circumstances set out in the settlement hierarchy below.
- 4.19 On these grounds, it is considered that allocations should be made at Perton in accordance with the Councils spatial strategy and other strategic objectives.
- 4.20 The identified strategic policies should ensure the availability of a sufficient supply of deliverable and developable land to meet the housing needs, ensure the maintenance of 5 Years Housing Land Supply (YHLS) and achieve Housing Delivery Test (HDT) performance measurements. This should be robustly evidenced in the Councils housing trajectory, taking into account previous evidence on deliverability of both strategic and non-strategic development sites. It is critical that an accurate assessment of availability, suitability, deliverability, developability and viability is undertaken. Assumptions on lead-in times and delivery rates should be correct and supported by parties responsible for the delivery of housing on each site.
- 4.21 NPPF paragraph 20 states that strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for various forms of development, infrastructure and community facilities, and for the conservation and enhancement of the natural, built and historic environment. This includes ensuring that the government's objective of 'sufficiently boosting the supply of housing' is met.
- 4.22 NPPF paragraph 23 states that strategic policies should provide a clear strategy for bringing sufficient land forward, at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area (except insofar as these needs can be demonstrated to be met more appropriately through other mechanisms, such as brownfield registers or non-strategic policies).
- 4.23 NPPF paragraph 68 states that planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:
- a) specific, deliverable sites for years one to five of the plan period; and
 - b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.
- 4.24 There has been a failure to maintain an adequate supply of land for housing and the Council has been the beneficiary of receiving unplanned housing growth across the District. It is recognised that this, in the absence of a 5-year housing land supply, has put significant pressure on the community's character and appearance and services, facilities and amenities. Having an up-to-date Local Plan is essential to enable and support the services and facilities needed to deliver new development. The absence of planned growth affects the delivery of supporting infrastructure and the coordination of objectives to deliver high-quality sustainable development.
- 4.25 The delivery of housing should be informed by up-to-date evidence by which strategic policies for the delivery of housing across the plan period should be informed. In general terms, the housing policies should seek to implement 21st Century objectives consistent with sustainable development and those policies should be reflective

of those objectives. Notwithstanding this, the Local Plan should ensure the required number of homes are delivered; the right types and sorts of homes for new communities are delivered; ensure a sufficient affordable housing target can be met in accordance with development viability estimations and the necessary supporting infrastructure; and to build strong and healthy communities. The Local Plan should be evidenced by a robust housing and economic needs assessment leading to a clearly locally derived objectively assessed housing need and the strategic policies should be a culmination of this evidence to ensure the Plan is 'robust', 'justified' and 'effective'.

- 4.26 The following statement set out in the Preferred Options Consultation document does not accord with national policy and reflect the allocation of development sites where there is an identified need.

'Limiting new allocations at Perton to the existing safeguarded land, reflecting the lack of a finalised junction improvement scheme at the A41 and the remoteness of Green Belt site options from education facilities.'

- 4.27 The sequential approach should seek to direct development to Tier 1 and 2 settlements, including Perton. While there are undoubtedly opportunities at the main Tier 1 settlements, there needs to be sites allocated to a mix of locations to meet all sources of housing need in the most sustainable locations. Increasing the portfolio of sites and locations will aid delivery and could benefit those smaller settlements in providing new homes and boosting local services. The allocation of land in sustainable settlements near the Black Country is particularly important given the unmet housing needs arising in this location. The spatial strategy should consider the commuting patterns of those likely to commute into employment centres in these locations.
- 4.28 The allocation of land for development at Perton has the potential to enhance the services and facilities and vitality of the settlement, thereby enhancing sustainability. This includes providing monies through S106 and CIL contributions to deliver the infrastructure required. There appears to be a lack of transparency in the revised spatial strategy that precludes additional development from being allocated at Perton.
- 4.29 The subject site is deliverable and achievable and would be able to begin delivery housing early in the plan period. As such, the Council should further consider its allocation as an extension to Perton.

Question 12:

a) It is proposed that the fully drafted policies in this document (Policies DS1-DS4 and SA1-SA7) are all strategic policies required by paragraph 21 of the NPPF. Do you agree these are strategic policies? Yes/No

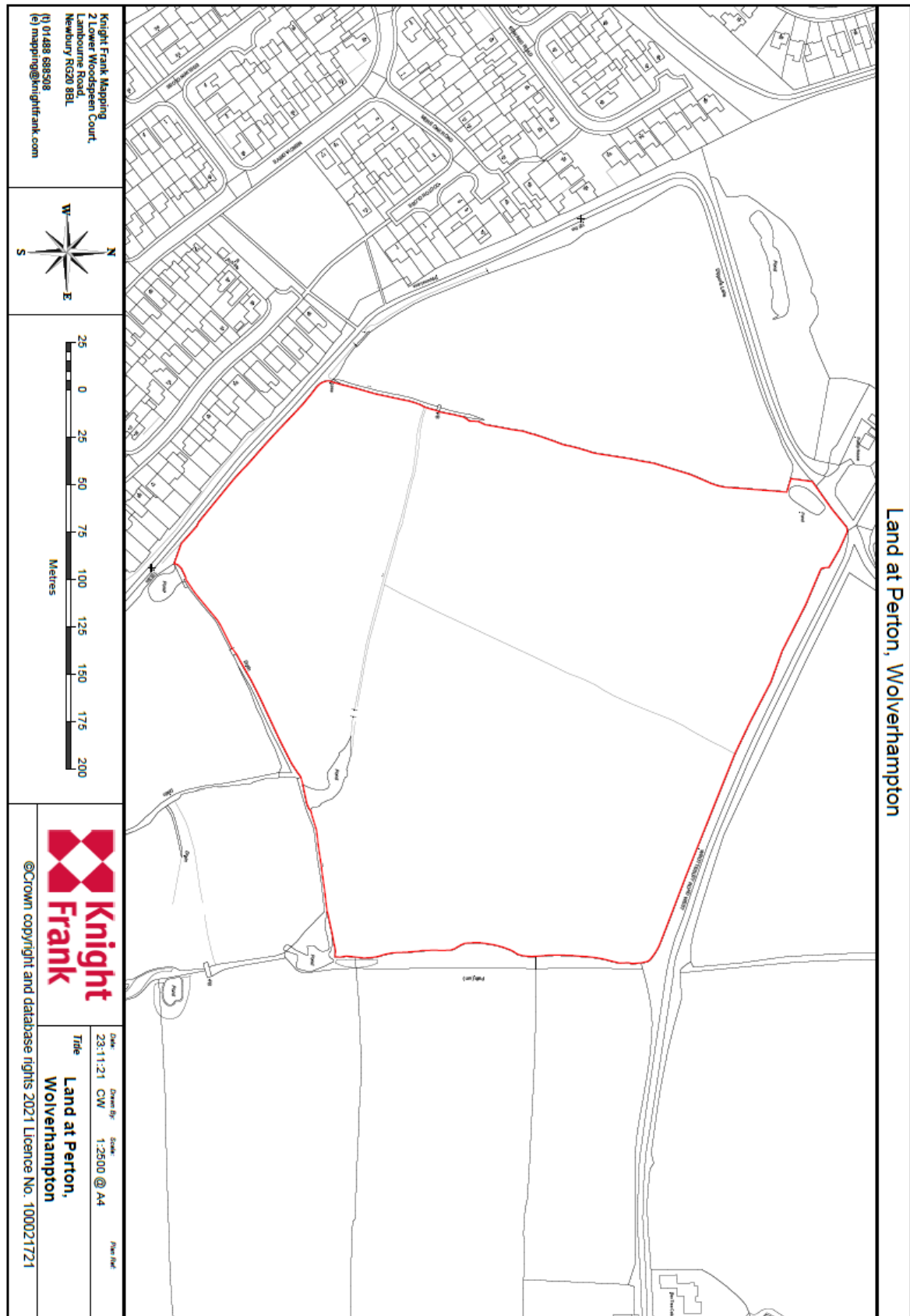
- 4.30 It is not agreed that these are the only strategic policies required by paragraph 21 of the NPPF. These are for the reasons set out above regarding cross-boundary issues and housing need. It is proposed that additional land should be allocated at Perton, owing to the sustainability credentials identified in the Local Plan evidence base.

5. Conclusion

- 5.1 The site referred to as Land off Westcroft Road (reference: 506) should be considered appropriate for development and allocated through the new South Staffordshire Local Plan. It is a deliverable site that can contribute to five-year housing land supply and housing need across the authority area.
- 5.2 Perton is a highly sustainable settlement with opportunity for additional housing allocation and growth, this site offers a sustainable option for non-strategic growth where the land is immediately adjacent to the existing settlement boundary. Land off Westcroft Road can deliver much needed housing (circa 140 homes), including affordable housing in a settlement that boasts a range of facilities, services and amenities.
- 5.3 Further benefits to the allocation of this site for residential development include, but are not limited to:
- Development of a well-integrated local neighbourhood with potential for circa 140 new homes, including the provision of affordable housing and/or older people's housing including care;
 - Development in a sustainable location with excellent connections to nearby facilities and employment opportunities by foot, cycle and public transport;
 - High quality and attractive mix of homes with a defining character influenced by the qualities of the adjacent settlement and the relationship of the site with the landscape setting;
 - Strategic delivery of services and community facilities following consultation with key stakeholders;
 - A place that sits within a provision of accessible open space which enhances the existing green infrastructure provides visual amenity and creates opportunities for play, sustainable drainage and habitat creation;
 - Enhancement of existing public rights of way that form part of a wider network of legible and safe streets and spaces designed to promote sustainable movement;
 - Increasing opportunities for homeownership and renting for younger people, families and an increasingly ageing population that wish to stay within or move back to their communities;
 - Increasing access to education and employment opportunities within easy reach of where people live; and
 - Supporting existing and/ or enhanced key services and facilities in the urban area, such as the local shop(s), community centres, public houses, broadband connectivity, local employment opportunities and viability of public transport connections to wider towns and urban areas.
- 5.4 As set out in the answer to Question 3 in this report, the housing requirement and total land allocation in the Local Plan should be significantly higher than that currently planned for. An increase in the housing requirement of the Plan would necessitate the identification of additional sites and it is right that part of that be accommodated through non-strategic sites. The fact that the Council is considering a new settlement at this time acknowledges the likelihood that there will be a need for additional sites. As such, part of this contingency should be met through mix of sites in order to meet the 5-year supply across the authorities in the GBHMA. Land at Westcroft Road has the potential to provide circa 140 dwellings (including affordable housing provision) in a location which was previously considered suitable for non-strategic growth.

6. Appendices

Appendix 1: Site Location Plan



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