	<p><b>Local Plan</b> Publication Stage Representation Form</p>	<p><b>Ref:</b></p> <p><b>(For official use only)</b></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\*

2. Agent's Details (if applicable)

*\*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.*

Title	Mrs
First Name	Tamsin
Last Name	Almeida
Job Title (where relevant)	Planning Manager
Organisation (where relevant)	Living Space Housing
Address Line 1	Hayfield House
Line 2	Arleston Way
Line 3	
Line 4	
Post Code	B90 4LH
Telephone Number	
E-mail Address (where relevant)	talmeida@livingspacehousing.co.uk



# Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Paragraph		Policy: DS4 SA1 – SA4 SA5	Policies Map	
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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 type="checkbox"/>	No	<input checked="" type="checkbox"/>
(3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input checked="" 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.

For full representations, please see **Appendix I**.

(Continue on a separate sheet /expand box if necessary)

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.



(Continue on a separate sheet /expand box if necessary)

**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**, 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:

# Appendix I – Full Representations

South Staffordshire District Council  
Council Offices  
Wolverhampton Road  
Codsall  
South Staffordshire  
WV8 1PX

***Delivered by email only***

23<sup>rd</sup> December 2022

## **RE: LIVING SPACE HOUSING REPRESENTATIONS TO THE SOUTH STAFFORDSHIRE LOCAL PLAN PUBLICATION CONSULTATION (REGULATION 19)**

This document comprises Living Space Housing's ('Living Space') representations to the Regulation 19 ("Reg. 19") version of the South Staffordshire Local Plan Review consultation. These have been prepared in relation to our land interest at Land at Old Hampton Lane, Wolverhampton. We therefore submit the following representations to the South Staffordshire Local Plan, Reg. 19 Consultation, December 2022.

### **1. The Site – Land at Old Hampton Lane, Wolverhampton**

- 1.1 Living Space control land known as Land at Old Hampton Lane (**Figure 1**). Whilst the site falls within South Staffordshire Authoritative boundary, it sits immediately adjacent to the administrative boundary of the City of Wolverhampton.
- 1.2 As the site is located on the edge of a large city, it is in close proximity to a number of existing services, including a number of primary schools, numerous shops and pubs, doctors surgeries, and a large supermarket. The site is located just off Cannock Road (A460) which provides a direct link into Wolverhampton. There is a bus service along this road (70) which provides a link between Park Village and Cannock Town Centre. The site is also in walking distance of Blackhalve Lane (B4156) which also offers a bus route (71) between Wolverhampton, Cannock Town Centre and Essington.
- 1.3 The site is wholly within Flood Zone 1 and is free from technical constraints. However, the site is wholly located within the Green Belt. **Figure 1** demonstrates the location of the site.

**Figure 1: Location of Land at Old Hampton Lane\***



\* The red line indicates the land at Old Hampton Road (within South Staffordshire). The blue line indicates the Fallings Park Strategic Allocation identified in the Regulation 18 Black Country Local Plan (discussed below).

## **2. South Staffordshire Local Plan Publication Regulation 19 Public Consultation**

- 2.1 The following provides Living Space's general comments on the proposed policies within the Regulation 19 version of the South Staffordshire Local Plan, as well as commentary on parts of the Plan specifically relevant to our site interest at Land at Old Hampton Lane, Wolverhampton. Living Space are in general support of the proposed policies but provide specific comments which we believe the Council will need to address to ensure that policies can be found sound.

## Policy DS4: Development Needs and Policy DS5: The Spatial Strategy 2039

- 2.2 Policy DS4 sets out the proposed housing delivery for the Plan period, up to 2039. It details that 9,089 dwellings will be delivered during the period of 2018-2039. This is to meet the District's need of 5,089 with 13% additional homes (4,000 homes) to ensure the plan's flexibility. Additionally, the 4,000 homes is to contributed towards the unmet housing need for the Greater Birmingham and Black County Housing Market Area (GBBCHMA).
- 2.3 However, Living Space consider that the policy as currently written cannot be found sound as it is not positively prepared, as is required by the National Planning Policy Framework (NPPF)<sup>1</sup>. It is well-known that there is a significant shortfall of housing within the GBBCHMA, particularly arising from Birmingham which has a shortfall of around 37,900 dwellings. In order to be positively prepared, it is important that the South Staffordshire Local Plan reacts to this shortfall as it is one of the authorities included within the Housing Market Area. The Plan should be flexible enough to facilitate the delivery of sustainable development where possible due to the significant shortfall of homes within the GBBCHMA.
- 2.4 Policy DS5 details that the housing figure will be viewed as a minimum, which is important to allow for flexibility. Terra consider that Policy DS4 should also explicitly state that the figure is a **minimum** figure. Furthermore, the Council should confirm that if unmet housing need in the GBBCHMA increases then its contribution will also proportionately increase. Additionally, the Council's commitment to meeting unmet housing need should be set out in a Joint Statement of Common Ground with the other GBBCHMA authorities.
- 2.5 The Black Country Authorities consulted on their Regulation 18 plan between August to October 2021. Contained within this plan was the proposed allocation of land at 'Fallings Park Strategic Allocation'. This allocation proposed the deliver of 303 homes immediately adjoining our interest at Old Hampton Lane **Figure 2**.

## Figure 2 – Area identified for the Fallings Park Strategic Allocation in the Regulation 18 Black Country Plan

<sup>1</sup> Paragraph 16, National Planning Policy Framework (NPPF) (2021), page 8



2.6 Despite the withdrawal of Dudley Council preventing the proposed Black Country Plan from proceeding further, Wolverhampton Council have confirmed in a recent report to Members regarding their revised Local Development Scheme that “it is recommended that a new Local Plan is prepared for Wolverhampton which takes forward the parts of the Draft Black Country Plan which relate to Wolverhampton and builds on the existing evidence base and consultation responses made to date”. It is therefore assumed that the proposed strategic allocation at Fallings Park will remain. The revised adoption date for the Wolverhampton Local Plan is 2025.

2.7 The 2019 Green Belt Study, prepared by LUC, assesses the land at Old Hampton Lane as parcel S28a. Appendix 3 of the Study ‘Harm Assessment’, considered that the harm of releasing this parcel from the Green Belt as ‘Low-Moderate’

Scenario	Size (ha)	Rating
<b>S28As1</b> Release of any land within the sub-parcel	<b>1.23</b>	<b>Low - Moderate</b>
List of Sites Within the Scenario		

Ref: 486a (Housing)



Harm Ratings Overview Map of Land within Sub-Parcel



2.8 The report expands on this recommendation stating:

*“The sub-parcel is adjacent to the settlement edge to the north but has strong spatial openness and a relatively strong relationship to the open countryside to the east. While the release of this sub-parcel would breach the boundary provided by Old Hampton Lane, this boundary has already been breached to the south, and the release of this land (in conjunction with contained Black Country sub-parcels to the south) would create a simplified and more consistent Green belt boundary.”*

2.9 Living Space agree that the harm of releasing this parcel from the Green Belt is low and that its removal would create a simple and more consistent boundary which would reflect the aspirations to release the land immediately to the south in the emerging Wolverhampton Plan to deliver strategic scale development.

2.9 In meeting the requirements of the Local Plan, South Staffordshire Council should include sites such as Land at Old Hampton Lane (‘the site’), which are capable of coming forward for housing to contribute towards the substantial shortfall. The site is on the edge of the urban area and should be released from the Green Belt in order to come forward for housing.

## Policies SA1 – SA4

2.10 The following strategic policies are proposed to deliver a number of dwellings to contribute to the housing requirement:

# LIVING SPACE

- Policy SA1 – Strategic development location: Land East of Bilbrook – 848 homes
- Policy SA2 – Strategic development location: Land at Cross Green – 1,200 homes
- Policy SA3 – Strategic development location: Land North of Linthouse Lane – 1,200 homes
- Policy SA4 – Strategic development location: Land North of Penkridge – 1,129 homes

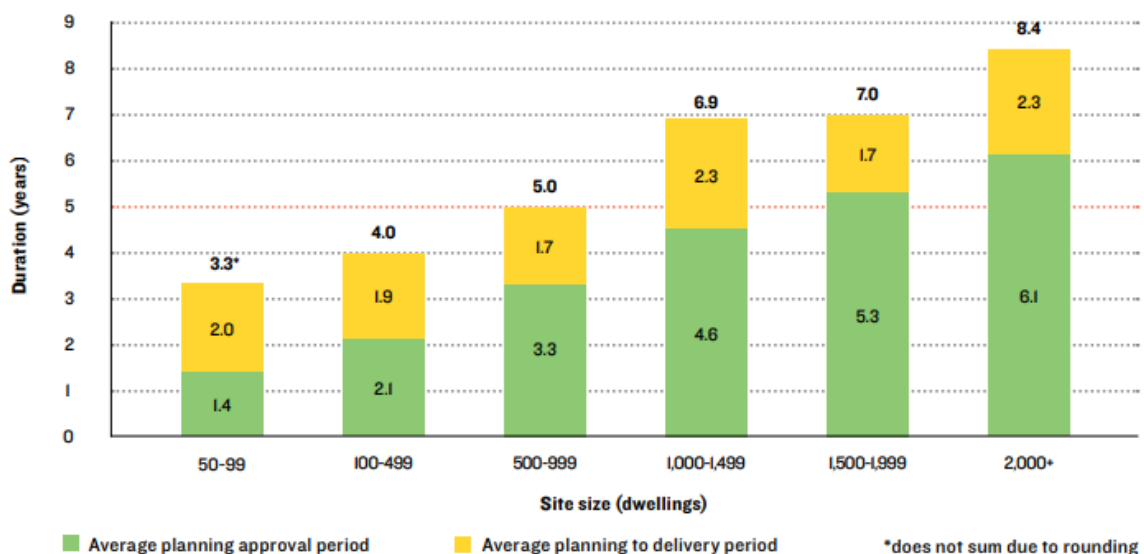
2.11 In February 2020, Lichfield published the second edition of their *Start to Finish*<sup>2</sup> paper which provides an update to their original findings published in 2016. *Start to Finish* has been used across the planning sector since it was first published as a respected evidence base to demonstrate the realistic delivery timescales of housing sites. The second edition focuses mainly on larger sites of 500+ dwellings, but it includes the below table and figure which show the average planning approval period by size of site in years and the average timeframes from validation of first application to completion of the first dwelling:

Table I: Average planning approval period by size of site (years)

Site Size	1st edition research (years)	This research (years)
50-99	1.1	1.4
100-499	2.4	2.1
500-999	4.2	3.3
1,000-1,499	4.8	4.6
1,500-1,999	5.4	5.3
2,000+	6.1	6.1

Source: Lichfields analysis

Figure 4: Average timeframes from validation of first application to completion of the first dwelling



Source: Lichfields analysis

<sup>2</sup> *Start to Finish*, Nathaniel Lichfield & Partners Ltd (2020)

2.12 The Council should ensure that the proposed timescales for the delivery of their larger strategic sites are realistic. The strategic allocations should also be supported by a sufficient supply of smaller sites which are readily available and deliverable to ensure the Council has a robust supply, in line with paragraph 69 of the NPPF<sup>3</sup>. The Council should consider allocating additional sites which are available, deliverable and achievable within the Plan period, such as Land at Old Hampton Lane. This will ensure that there are enough sites identified in the event that the delivery of the 4 strategic sites falters.

## **Policy SA5: Housing Allocations**

2.13 This Policy sets out the smaller housing allocations for the District, totalling c. 2,717 dwellings. Living Space support the inclusion of “minimum” when allocating site capacity. This allows the allocations to make the best use of land and increase capacity if the sites are capable of delivering a higher yield.

2.14 The Plan should include a mix of strategic and non-strategic allocations to ensure sufficient delivery of housing over the plan period, as well as creating a varied choice of housing options for current and future residents within the District. However, Living Space believe that additional sites should be identified within the Plan to ensure a robust supply. Land at Old Hampton Lane is available, deliverable and achievable for delivery of residential development within the Plan period. The site should be released from the Green Belt and included within Policy SA5 for an allocation within the Plan.

## **3 Conclusion**

3.1 We politely request that these representations are taken into account. Land at Old Hampton Lane, Wolverhampton is adjacent to the existing built-up area, accessible by public transport and within walking distance of village services. Allocating this site for housing will ensure that there is a sufficient supply of suitable sites within the authority and to help contribute towards the identified shortfall within the GBBCHMA.

3.2 Furthermore, Living Space agree with the recommendations of the Green Belt Study that the harm of releasing this parcel from the Green Belt is low and that its removal would create a simple and more consistent boundary which would reflect the aspirations to release the land immediately to the south in the emerging Wolverhampton Plan to deliver strategic scale development.

3.3 We trust that you will find the above acceptable, however, should you require any further information in relation to the site please do not hesitate to contact me

Yours faithfully,

*T E Almeida*

**Tamsin Almeida MRTPI**

Planning Manager

**0121 272 8899**

[talmeida@terrastrategic.co.uk](mailto:talmeida@terrastrategic.co.uk)

<sup>3</sup> National Planning Policy Framework (NPPF) 2021, paragraph 69, page 19