



## SOUTH STAFFORDSHIRE COUNCIL PREFERRED OPTIONS CONSULTATION NOV/DEC 2021

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in respect of  
Land at School Road, Himley  
on behalf of  
Taylor Reed Homes  
9 December 2021  
Client Reference: RCA745b  
Last User: LC

# QMS

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# 1. INTRODUCTION

- 1.1. This is a representation made on behalf of Taylor Reed Homes in respect of a site at School Road, Himley.
- 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 13<sup>th</sup> December 2021.
- 1.3. We have considered the Local Plan as it now stands and have also considered the policies being proposed. We do not respond to all sections of the 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 and policies, we end with further information regarding our client's site on Land at School Road, Himley:

- Summary comment regarding the selected Preferred Option
- Strategic Objective 1
- Strategic Objective 2
- Strategic Objective 9
- DS1 Green Belt
- DS2 Open Countryside
- Housing Supporting Text
- DS3 The Spatial Strategy to 2038
- DS4 Longer Term Growth Aspirations for a New Settlement
- SA2 Strategic Development Location: Land at Cross Green
- SA5 Housing Allocations
- HC1 Housing Mix
- HC3 Affordable Housing
- HC4 Homes for Older People
- HC6 Rural Exception Sites
- HC7 Self & Custom Build Housing
- HC9 Design Requirements
- HC11 Space about dwellings and internal space standards
- HC14 Health Infrastructure
- HC15 Education
- HC17 Open Space
- HC19 Wider green infrastructure design principles
- NB5 Renewable and low carbon energy generation
- NB7 Managing flood risk, sustainable drainage systems and water quality

## 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.
- 2.2. Option G from the SHSIDP was identified as the preferred strategy, 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).
- 2.3. 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

- 2.4. This Objective states that where Green Belt release is necessary, there will be a mechanism in place to secure compensatory improvements. 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 would be a positive objective, 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

- 2.5. 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

- 2.6. 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.
- 2.7. Further the importance placed on rail links set out in Option G does not translate into some of the sites selected.

### Policy DSI Green Belt

- 2.8. 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.

- 2.9. 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-site’, it will have 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.
- 2.10. 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.
- 2.11. 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.

### **Policy DS2 Open Countryside**

- 2.12. 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.

### **Housing Supporting Text (paragraphs 4.6 to 4.20)**

- 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 reserve sites (1,608) against the provision of housing overall (5,348) seems high. Whilst we accept the need for reserve sites which reduce the need for a continuously reactive reassessment of green belt boundaries in future, once must conclude 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. 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.
- 2.16. If the focus of green belt release in the emerging Plan is solely that needed to meet the emerging Plan requirements, then future planned development needs will necessitate further green belt releases. We consider it would be more appropriate, both for effective and positive preparation of the emerging Local Plan and to ensure that green belt boundary review is not an ongoing iterative

process running alongside Plan preparation on each occasion, to seek to secure sufficient land release to meet anticipated future needs beyond the Plan period. This would be more aligned to the need to plan positively.

### **Policy DS3 – The Spatial Strategy to 2038**

- 2.17. There is some confusion here as to 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.
- 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 Wombourne, a highly sustainable location – which is currently subject to only limited growth. This is one of the most unaffordable areas of the Borough and proportionate growth and the attendant improvement in housing choice 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, however provides little explanation to how the site will be delivered, and therefore we do not consider there to be sufficient certainty regarding the deliverability of these proposals.

### **Policy DS4 – Longer Term Growth Aspirations for a New Settlement**

We query why this policy is included in the draft Plan 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**

- 2.20. 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 and may not assist in the delivery of the site in a timely manner.
- 2.21. 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 SA5 – Housing Allocations**

- 2.22. There are no allocations in Himley. We believe there is a need to distribute allocations to appropriate smaller sites across South Staffordshire and considering their viability without the need for new large supporting infrastructure.

### **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 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 Built 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 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 & Policy HC15 – Education**

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

### **Policy HC17 – Open Space**

- 2.39. 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**

- 2.40. 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, rather than left for an SPD which may not be produced for some time.
- 2.41. 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**

- 2.42. 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.
- 2.43. 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.
- 2.44. 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 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**

- 2.45. 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 Framework<sup>1</sup>). Therefore, it is unclear why this policy is seeking to request an FRA on all major 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.
- 2.46. 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.

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

### 3. THE SITE AND PROPOSALS: LAND AT SCHOOL ROAD, HIMLEY

- 3.1. The land at School Road, Himley could deliver approximately 43 new homes (around 30 market and 13 affordable homes) as well as green infrastructure (and necessary biodiversity net gain), areas of sustainable drainage and other public benefits, during the first 5 years of the plan.
- 3.2. The site is located between a number of existing residential properties towards the backland of Plantation Lane, Bridgnorth Road and School Road. School Road and Bridgnorth Road are the main routes into the small village of Himley that is predominately residential in character, with existing dwellings to the north-west, west, south and east of the site. The established housing mix surrounding the site is predominantly detached houses, bungalows and some semi-detached.

**Figure 1: Aerial view of School Road site**

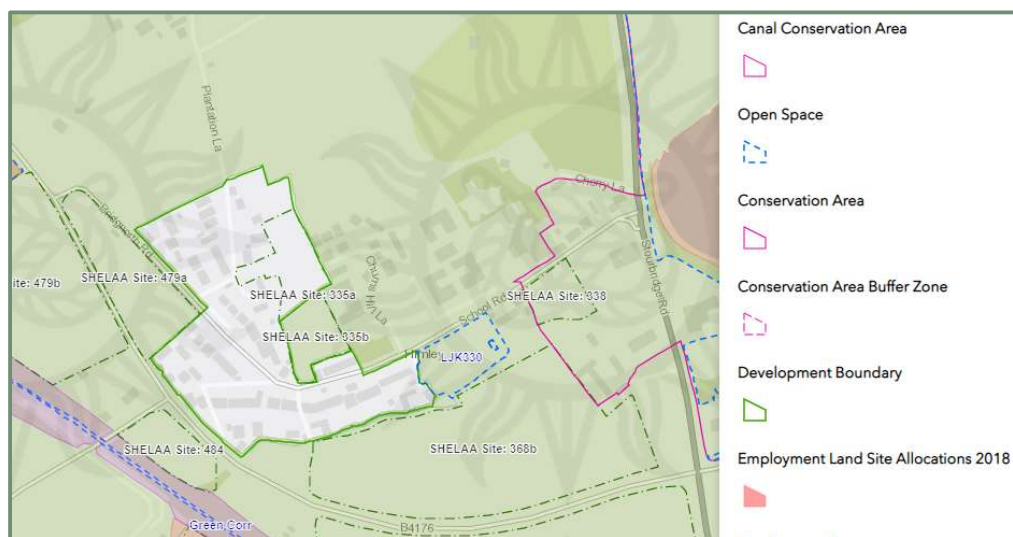


- 3.3. The site itself consists of an undeveloped piece of private overgrown and largely neglected grass and shrub covered backland of irregular shape, currently used for equestrian grazing. The site is an obvious infill plot and is defined by a combination of wooden fences and scrubby vegetation. The terrain slopes down towards the south of the site where it meets School Road and is best accessed via Plantation Lane, a residential road to the west most tip of the site. The site is approximately 1.23ha (3.04 acres) in area and is relatively open with a number of small, medium and large trees (some with recognised Tree Protection Orders) around its perimeter. Other distinguishing features include electrical pylons that cut across the site from north to south.

## South Staffordshire – Strategic Housing and Economic Land Availability Assessment (2021)

- 3.4. The subject site is addressed in previous SHELAAAs and is included in the 2021 SHELAA, where it is divided into two parcels, ref: SHELAA Site 335a and 335b as shown in figure 2.

Figure 2: South Staffordshire Interactive Map



- 3.5. The site (reference 335a and 335b), where it falls into South Staffordshire is omitted as an allocation in the Preferred Options document, and we strongly object to this.
- 3.6. Overall, the site (including both parcels shown in figure 11) is deemed “*potentially suitable*” for residential development, notwithstanding some policy concerns relating to; Core Policy 1 (The Spatial Strategy), identified TPOs on the perimeter of the site and the Green Belt designation.
- 3.7. The SHELAA makes the following assessments over the two parcels:

*335a: Site lies within Himley Development boundary and is currently being marketed. Himley is not allocated for growth under Core Policy 1 of the adopted Core Strategy. TPOs within site. Development boundary site modelled at 38 dwellings per hectare.*

*335b: Site lies within Green Belt adjacent to the Himley settlement boundary. TPOs adjacent to the site. Village edge site modelled at 32 dwellings per hectare.*

- 3.8. In considering the content of the Lepus Consulting Interim SA dated August 2021, it assessed the site as falling within the ‘Wombourne Cluster’. The site was assessed against a number of objectives and performs well against many of them and compared to sites 479a and 707, is the best performing potential site in Himley.
- 3.9. The overall assessment of the site in the SA (at Appendix F, F47) is as follows for parcel 335a: ‘*Key positives and negatives: • Site is within the development boundary, unlike other site options around the village • Major negative impacts predicted against education criteria in the Sustainability Appraisal • Highways authority raise initial concerns with access...*
- ...Conclusion: Having regard to all site assessment factors set out in the proforma and the relative sustainability of Tier 4 settlements, the site is not considered to perform so well as to warrant allocation.’*
- 3.10. The following overall assessment is made for parcel 335b: ‘*Key positives and negatives: • Similar Green Belt harm to the majority of land in this broad location (site is ‘moderate’) • Higher landscape*

*sensitivity than the majority of land in this broad location (site is 'moderate') • Major negative impacts predicted against education criteria in the Sustainability Appraisal • Highways authority raise initial concerns with access...*

*...Conclusion: Having regard to all site assessment factors set out in the proforma and the relative sustainability of Tier 4 settlements, the site is not considered to perform so well as to warrant allocation.'*

- 3.11. The site's overall concerns regarding education should take account of the Blakeley Heath Primary School, Maidensbridge Primary School and Little Learners Nursery, within 1km of the site. The site benefits from a total of 10 nearby primary, special needs and high schools in Wombourne, Swindon and Wall Heath.
- 3.12. With regards to parcel 335b's Green Belt allocation, the South Staffordshire Green Belt Review (July 2019)<sup>2</sup> Appendix 3 'Stage 2 Harm Assessments states the following about sub-parcel S72As2 (of which the site is part of), states:
 

*"The village of Himley remains partially washed over to the southeast of the sub-parcel. Release of smaller, more contained areas on the fringes of the three settlements would constitute negligible weakening of the adjacent Green Belt: Himley Plantation and a tree belt to the east of it provide containment to land adjacent to Wombourne and the former also contains land adjacent to Himley."*
- 3.13. Parcels 335a and 335b would fall into this category of a "small" and "contained" area, being entirely surrounded by existing dwellings and partly within the Himley development boundary, making it a prime infill development site, that would not significantly increase the size of the settlement nor result in significant harm to the openness of the Green Belt.
- 3.14. The two parcels (335a and 335b) that form the site, demonstrate infill development land, being bounded on all sides by existing dwellings, some of Green Belt designation to the east and south and non-Green Belt to the north and west. The site is also partly in and partly adjacent to the Himley development boundary and is an island of neglected private and inaccessible scrubland which bears no public benefit to the people of Himley. If allocated as a preferred options site, its impact would be minimal and would greatly reduce pressure to develop sites on the peripheries of the village, reducing sprawl, encroachment on surrounding settlements and safeguarding the historic character of Himley. As such, the parcel could be removed without impacting on the function of Greenbelt.
- 3.15. Further evidence is provided in support of development of this site in a full planning application, that was submitted on 15 November 2021 (21/01216/FUL).
- 3.16. We submit that this site could be a reasonable additional allocation rather than an alternative. This site could deliver around 43 new homes within the first 5 years of the next South Staffordshire plan period, without the need for major infrastructure investment and without the need to phase delivery. Allocation of this site would lend much needed flexibility to the delivery of housing in the new plan period. We encourage you to reconsider your decision to omit this site from the proposed allocations.

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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/>



