|  |  |  |
| --- | --- | --- |
| **A picture containing text, vector graphics  Description automatically generated** | **Local Plan**Publication Stage Representation Form | **Ref:****(For official use only)**  |
|
|
|  |
| **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 |  Mr |   |  Mr |
|   |  |
| First Name |  Jonathan  |   | Sam  |
|   |  |
| Last Name | Tomlinson |   | Silcocks |
|   |  |
| Job Title  |  |   |  Director |
| (where relevant) |  |
| Organisation  | Heyford Developments |   |  Harris Lamb |
| (where relevant) |  |
| Address Line 1 |  c/o Agent |   |  Grosvenor House |
|   |  |
| Line 2 |   |   |  75-76 Francis Road |
|   |  |
| Line 3 |   |   |  Edgbaston |
|   |  |
| Line 4 |   |   |  Birmingham |
|   |  |
| Post Code |   |   |  B16 8SP |
|   |  |
| Telephone Number |   |   |  0121 455 9455 |
|   |  |
| E-mail Address |   |   |  sam.silcocks@harrislamb.com |
| (where relevant) |  |
| **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 |  | Policies Map | Omission Site – Wall Heath |
| 4. Do you consider the Local Plan is : |
| (1) Legally compliant(2) Sound | YesYes  | ✓ |  | No No |  |
|  |  |
|  | ✓ |
| (3) Complies with the Duty to co-operate Yes No ✓  |
| 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 land at Enville Road in Wall Heath should be removed from the Green Belt and allocated for residential development. This site is a sustainable location to deliver housing on the edge of the conurbation. It would integrate well with the surrounding residential development and has good access to services and facilities.These representations are accompanied by a Vision Document that highlights the opportunities presented by the site. In summary, this includes: * The provision of approximately 148 new homes. Showcasing a mix of housing types and tenures, helping South Staffordshire to meet its housing needs.
* Existing housing development on two sides, and a brook to the north that already forms the boundary with the Green Belt for the adjoining housing development.
* Wall Heath’s connections to major hubs in the Black Country and Birmingham make it an attractive location for residential development which can assist with the neighbouring unmet housing needs in a sustainable manner. Its suburban location also offers access to nature and a wide range of associated leisure activities.
* Multifunctional green space will be provided in the site, offering health benefits for people and environmental benefits for wildlife. Street trees will be planted to soften the site’s built form whilst helping to mitigate the impacts of climate change and supporting a net gain in biodiversity.
* The proximity of the site to Wall Heath’s village high street offers access to restaurants, cafes, pubs and more.
* A network of footpaths and cycle paths provide convenient access routes and promote sustainable modes of travel within the site and beyond, including to the aforementioned facilities and wider countryside.
* The development will be a distinctive, permeable and well-connected place that has been informed by best practice urban design principles and is responsive to its setting and important site features.

The Vision Document sets out a design framework to guide the site and explains how the scheme can respond to constraints. A concept masterplan is provided demonstrating how the site could be brought forward for an attractive development that takes advantage of the sites topography and natural features. The site is within the Green Belt, which is true for most of the land in the southern and western section of South Staffordshire. It is also true that a significant amount of Green Belt land will need to be released if the development needs of South Staffordshire and the conurbation are going to be met. Any development within the Green Belt will have some impact on its aim and purposes of including land within the Green Belt. However, those impacts are relatively limited in this instance:* The development of the site will not result in the ‘unrestricted’ sprawl of a large built-up area. The site is contained by existing residential development to the east and south, and it would not project further into the countryside to the north or west than the existing housing development. The site is contained by the watercourse to the north, which already forms the Green Belt boundary with the housing development to the east, and the landscape boundary to west of the site would be reinforced, beyond which is the Wall Heath Sub Station. Consequently, the site has strong defensible Green Belt boundaries.
* It will not result in towns merging into one another. There are no nearby towns that will be visible from the scheme.
* The development of the site will result in encroachment into the countryside. This is true of any greenfield Green Belt site. However, the site is well contained reducing the impact in this regard.
* The development will not have any impact on the setting or character of a historic town
* The development will not hinder urban regeneration.

The South Staffordshire Green Belt Study suggests that there would be ‘high’ harm to the Green Belt should this site be developed. This is the same status as a large proportion of the Green Belt within the study area. However, it is our view that the Green Belt harm is limited, for the reasons referred to above. To date, South Staffordshire have not allocated development on the edge of Dudley Metropolitan Borough Council, arguing that the overspill from the Black Country originates from the other three authorities. There are two fundamental points that we would like to make in this regard: * Wall Heath is located only a short distance to the south of Wolverhampton and there are sustainable transport links directly to it from the site. This is just one example as to why sites on the edge of Dudley MBC can still positively contribute to addressing the shortfall across the conurbation as a whole.
* If we follow this logic, it suggests that dwellings should be located as close to the source as possible when addressing the overspill. South Staffordsire is best located in this context to meet the overspill from the Black Country and South Staffordshire should be proposing significantly more houses to address the overspill. It is also evident that whilst there might be some sites close to the source the Wall Heath site, there are nowhere near enough sites to address the overspill that will be better relates to the source than the Wall Heath site.

As detailed in these Representations and the Vision Document, there are a number of significant benefits to the proposed allocation of the site. The benefits of development far outweigh any harm. The site can play a valuable contribution towards meeting the housing requirement/overspill from the conurbation. It is within the control of a promoter and can be brought forward for development promptly if it is allocated. (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. |
| Land at Enville Road, Wall Heath should be identified as a residential allocation in the emerging plan(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) | X | **Yes**, I wish to participate in hearing session(s) |
| Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate. |
| 8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: |
|  |
| To set out our case why this site should be included as a residential allocation in the emerging plan. |
| ***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**