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Planning Policy
South Staffordshire Council
Wolverhampton Road
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Via email only

20th December 2022

Dear Sir/Madam,

SOUTH STAFFORDSHIRE LOCAL PLAN: PUBLICATION PLAN CONSULTATION SOUTH STAFFORDSHIRE COLLEGE, RODBASTON

Introduction

This representation has been prepared by Carter Jonas LLP on behalf of South Staffordshire College in response to the Regulation 19 South Staffordshire Local Plan Publication Plan (“the Publication Plan”) consultation. The 6-week consultation period commenced on 11th November and will close on Friday 23rd December 2022. Based on the recently adopted Local Development Scheme (October 2022), we understand that the Council is aiming to submit the Local Plan in April/May 2023 with an examination to follow in August and September 2023 and adoption of the Plan in December 2023.

This covering letter sets out the background information in relation to South Staffordshire College, details the relevant planning policy context and provides a response to Draft Policy HC16: South Staffordshire College (Rodbaston) and Appendix I (Car Parking Standards) of the Regulation 19 South Staffordshire Local Plan Publication Plan (2022).

Background

Our client's site at Rodbaston is situated within the Green Belt, whereby development is usually constrained by local and national planning policies. However, given the site's importance as an established agricultural college, South Staffordshire Council have historically included a policy within the Development Plan to support South Staffordshire College's growth and to provide additional flexibility for further development.

This is currently set out in Policy EV4 (South Staffordshire College (Rodbaston)) of the Core Strategy (December 2012). For clarity, this policy reads as follows:

“Within the Special Policy Area defined on the Policies Map, proposals for new development associated with the use of South Staffordshire College (Rodbaston) as an education and training establishment will be supported. Proposals for the site should be in accordance with a Master Plan to be submitted to the Council for approval following consultation with the Council's Statement of Community Involvement (SCI).”

Proposals should show:

- a) *that the development proposed is for education and training uses directly related to the activities of the College and can include business start up activities to support people into work in areas of employment related to College Curriculum subjects;*
- b) *That the development is of a scale and massing appropriate to its location having regard to the guidelines in respect of building footprints, heights and design that are set out in the approved Master Plan;*
- c) *that the design and external appearance of the development is of a high standard and uses high quality sustainable materials;*
- d) *where appropriate, existing buildings that are surplus to requirements are demolished;*
- e) *the provision of satisfactory access and vehicle parking;*
- f) *the incorporation of a satisfactory landscaping scheme, which complements and enhances the development and the local environment;*
- g) *that the development is located outside Flood Zones 2 and 3;*
- h) *that the development will not lead to the loss of sports facilities or, if it does, then compensatory provision/investment in sports facilities can be found in a suitable location elsewhere within the College estate. Any replacement sports provision must be equivalent if not better than that being replaced in terms of quality, quantity and accessibility.*

Development proposals should be consistent with other local planning policies”

A similar policy is being proposed under Policy HC16: South Staffordshire College (Rodbaston) of the Regulation 19 South Staffordshire Local Plan Publication Plan (2022). The draft policy is worded as follows:

“Within the Special Policy Area defined on the Policies Map, proposals for new development associated with the use of South Staffordshire College (Rodbaston) as an education and training establishment will be supported.

Proposals should demonstrate all of the following:

- a) *That the development proposed is for education and training uses directly related to the activities of the College and can include business start up activities to support people into work in areas of employment related to College Curriculum subjects.*
- b) *That the development is of a scale and massing appropriate to its location.*
- c) *That the design and external appearance of the development is of a high standard and uses high quality materials which relate well to the development’s setting.*
- d) *where appropriate, re-use of existing buildings for uses which support the existing uses at South Staffordshire College.*
- e) *The provision of satisfactory access and vehicle parking.*
- f) *The incorporation of a satisfactory landscaping scheme, which complements and enhances the development and the local environment.*
- g) *That the development is located outside Flood Zones 2 and 3.*
- h) *That the development will not lead to the loss of sports facilities or, if it does, then compensatory provision/investment in sports facilities can be found in a suitable location elsewhere within the college estate. Any replacement sports provision must be equivalent if not better than that being replaced in terms of quality, quantity and accessibility.*

Development proposals should be consistent with other Local Plan policies.”

Planning Policy Context

The following section details the relevant national policies which underpin this representation.

Paragraph 8 of the National Planning Policy Framework (2021), hereinafter referred to as the NPPF, sets out three sustainability objectives which are as follows:

'a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy'.

In accordance with paragraph 35 of the NPPF (2021), prior to adoption, Local Plans must be assessed as to whether they accord with legal and procedural requirements and meet the test of soundness. The test of soundness is set out below:

'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.'

Draft Policy HC16: South Staffordshire College (Rodbaston)

First and foremost, we support the overarching principle of including a specific planning policy in relation to future development at South Staffordshire College. This enables the college to continue to develop the educational opportunities it offers to circa 1,500 students and secures and safeguards employment opportunities for the circa 200 employees. The continual development of the college will clearly contribute to all three sustainability objectives set out in paragraph 8 of the NPPF (2021). Notably, it will contribute to the economic objective by delivering high quality educational and employment opportunities which will assist in building a strong, responsive and competitive economy. This in turn, will support the wider community's overall well-being, contributing to the social objective. South Staffordshire College is also committed to protecting the environment and adapting to climate change and this will be reflected in any forthcoming development proposals.

On the whole, we support the amended wording of the policy which is being proposed in the Publication Plan. However, we do not consider criterion d meets the test of soundness.

Criterion d has been amended to no longer support the demolition of buildings and instead focuses on their re-use only. Whilst we agree that the re-use of buildings is typically preferred given the sustainable objectives of the planning system, there are instances whereby demolition is the most appropriate course of action. The previous policy caveated the support for demolition to only be allowed 'where appropriate' and therefore sufficient justification would need to be submitted in support of a planning application which comprised the demolition of any building. We are not aware of any justification or changes to the evidence base which supports the revised wording removing the support for appropriate demolition.

Accordingly, to ensure the policy is justified by being based on a proportionate evidence base, we request that criterion d is worded as follows to support both demolition and re-use;

“where appropriate, re-use of existing buildings for uses which support the existing uses at South Staffordshire College or the existing buildings that are surplus to requirements are demolished”.

The above wording will provide sufficient ability for the Council to assess each development proposal on its own merits, taking into account the evidence and justification submitted in support of the application. Thus, the proposed amendment to the policy will not result in the undesirable demotion of buildings. Instead, it will provide flexibility for South Staffordshire College to bring forward development proposals which include appropriate demolition of buildings if they are surplus to requirements. This will support the overall operations of the site and assist in ensuring future developments contribute to enhancing the character of the site and surrounding area, in accordance with local and national planning policies.

Appendix I – Parking Standards

The adopted vehicle parking standards in the Development Plan for colleges is 1 space per member of teaching staff and 1 space per 10 full-time equivalent students. This has not been altered in the emerging Publication Plan. However, cycle parking and storage has increased from 1 space per 10 students to 1 space per 3 students and 1 space per 5 staff.

As detailed above, the College has circa 200 members of staff and around 1,500 students. These are not all full-time students and employees. Notably, some students are only enrolled for 1 evening class per week. Furthermore, given the site's location outside of a settlement and within the countryside, it is not feasible for a significant number of employees or students to travel by bicycle. Given the site's location, increasing cycle parking will not directly improve the sustainability of the site. It must be noted that the majority of students do utilise sustainable transport modes and travel to the college via bus or minibus.

Thus, 1 space per 5 staff and 1 space per 3 students would be excessive and lead to a significant amount of cycle storage remaining unused, detracting from the character and appearance of the site and surrounding area.

Taking the above into consideration, we request an additional sentence is added into Draft Policy HC16: South Staffordshire College (Rodbaston) to confirm the parking requirements set out in Appendix I are not applicable to our client's site. This would ensure the Development Plan is justified by creating an appropriate strategy based on proportionate evidence. We are willing to work with South Staffordshire Council to determine an appropriate parking guide for South Staffordshire College should it be considered necessary to do so.

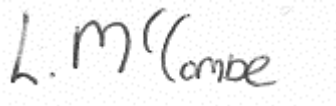
The Parking Standards also require colleges to provide 20% of available car parking spaces to be fitted with a fast charge socket and a further 20% of available spaces to be provided with power supply to provide additional fast charge sockets. We strongly support the principle of providing the infrastructure to enable the transition towards electric vehicles. However, South Staffordshire College have power limitations which will restrict the infrastructure which can be brought forward without the provision of an additional power line which would be a significant financial expense.

To ensure the Publication Plan is deliverable over the plan period and therefore meets the test of 'soundness' in respect of effectiveness, the wording should be amended to caveat that it will be assessed on a case by case basis, taking into account viability and existing infrastructure provision.

Conclusion

In conclusion, we agree that in the main the Publication Plan as drafted meets the test of soundness set out in paragraph 35 of the NPPF (2021). However, to ensure it complies fully in respect of Draft Policy HC16: South Staffordshire College (Rodbaston) and Appendix I (Parking Standards), we strongly advise that the minor amendments detailed in this letter are undertaken.

If you require any further information or would like to discuss this representation in further detail, please do not hesitate to contact me.

A handwritten signature in black ink that reads "L. McCombe". The signature is written in a cursive style with a large 'L' and 'M'.

Laura McCombe

Associate, Planning & Development

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