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Dear Sirs,

Response to the Local Plan Review Preferred Options Consultation Land at Mile Flat, Kingswinford

On behalf of our client, FGD Limited, we are writing in response to the Local Plan Review Preferred Options consultation in relation to their land interests at Mile Flat, Kingswinford ('the Site').

Site Context

The Site is located off Mile Flat in Wall Heath, Kingswinford and is approximately 33 hectares (83 acres). The Site is in single ownership (FGD Limited) and is currently in agricultural use. As shown on the attached Site Location Plan, the Site is bound by Swindon Road, a Sub Station and Hinksford Caravan Park to the north, Mile Flat, residential dwellings and commercial properties to the east, agricultural land and Greensforge to the south and the Staffordshire Canal to the west.

Our client's land is located within South Staffordshire District ('SSDC') Local Planning Authority (LPA) Area but is immediately adjacent to Dudley Metropolitan Borough Council's (DMBC) LPA area.

The Site has been assessed in the SHELAA 2021 (site reference 577) as 'NCD1' which the Housing Site Selection Topic Paper 2021 states that this means the site is "potentially suitable for housing but not currently developable because of a policy designation". Appendix 3 of the Topic Paper states that the key constraints for the site is against the Education and Landscape criteria. The Site is considered to be too far from primary and secondary education and it is located within an area of High Green Belt harm. In regards to education, the site is of a scale where land for a primary school and / or community facilities could be provided to support residential development on the site and elsewhere in the District / Kingswinford if required.

Although the Site is in an area of 'high' Green Belt harm, all of the land to the west of the Black Country has either been assessed as 'high' or 'very high' and the Site has 'low-moderate' landscape sensitivity. It is considered that suitable Green Belt compensatory and landscape improvements could be provided on the Site if it was allocated for residential and / or employment uses. We also consider that if the Site was released from the Green Belt, then Mile Flat offers a clear physical and permanent revised Green Belt boundary (National Planning Policy Framework (NPPF) paragraph 143f).

Appendix 3 of the Topic Paper also notes that the "Historic Environment Site Assessment indicates the potential for significant effects that may not be mitigated". This is noted and, if allocated, further technical work could be undertaken by the landowner to identify the significance of the heritage assets and any mitigation which could be implemented to limit any impact on the assets.

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Appendix 2 of the Topic Paper sets out that the Highways Authority have no concern with access to the site. It is considered that the Site is in an accessible location in close proximity to Wall Heath (0.6 miles) which offers a number of shops and facilities. There are also a number of schools within 1.6km of the Site: St John's C of E Primary School to the north and Summerhill School and Mitie Within Summerhill School to the south east. There are also existing bus stops on Swindon Road (immediately adjacent) and Enville Road (c. 50m from the Site) to the north of the Site. Both stops serve bus route 16 which offers a frequent service and connects the Site to Stourbridge, Wombourne, Kingswinford and Wolverhampton.

It is considered that the Site is suitable for residential and / or employment uses, is available for development and could be delivered within the next 5 years if required.

Preferred Options Consultation Response

Question 5: Do you support the policy approach in Policy DS3 – The Spatial Strategy to 2038? If no, please explain how this policy should be amended?

Policy DS3 seeks to deliver a minimum of 8,881 dwellings up to 2038. This is based on 4,881 dwellings (243 dwellings per annum) to meet South Staffordshire's housing need and a 4,000 dwelling contribution towards the HMA shortfall.

The Planning Practice Guidance ('PPG') is clear that the standard method sets the minimum housing need and does not produce a housing requirement figure (Reference ID: 2a-002-20190220); and there may be circumstances where a higher requirement is appropriate, for example, meeting unmet Greater Birmingham Housing Market Area ('HMA') needs or previous levels of housing delivery (Reference ID: 2a-010-20201216). Additionally, In order to be found sound, a plan should be positively prepared and "*seek to meet the area's objective 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*" (NPPF paragraph 35).

We consider that an uplift should be applied to the minimum standard method figure of 243 dwellings per annum in order to fully meet local needs. In addition to this, the proposed contribution towards the HMA should be updated to reflect the increases shortfall arising from Birmingham's 35% standard method uplift and the additional housing shortfall identified by the Black Country authorities (circa 28,000 dwellings). Given the strong connectivity and functional relationship between South Staffordshire and the Birmingham conurbation, the District is well placed to accommodate more of the shortfall than other authorities in the HMA. If additional sites are released from the Green Belt and allocated to meet any requirement increase, Site 577 is immediately adjacent the edge of the Black Country conurbation and scored well in the Site Assessment, we consider that it is suitably placed to meet this housing need.

In regards to employment, the Preferred Options document states that there is a need for 67-86ha of employment land across the plan period and that the District has an identified supply of 340 Hha which the Council is primarily relying on being met by Strategic Allocation SA7 – West Midlands Interchange (297ha). We strongly object to this on the basis that this proposal was intended to be delivered to meet a national / regional employment requirement that simply a local need which should be met using a smaller range of site types and locations. No additional sites are proposed to be allocated for employment use within the plan. Policies DS3 and SA7 do not break down the specific employment needs of the District nor do they confirm if the available land set in Table 9 meets the identified scale and locational needs of the commercial sector. Further clarity is sought from the Council on this matter. Should additional land be required, the Site 577 is considered to be a suitable location for employment uses.

I trust the above is helpful. Please contact me should you have any queries.

Yours faithfully

A handwritten signature in black ink, appearing to be "JG", with a long horizontal stroke extending to the right.

Jessica Graham
Associate

Enc.