



1 Springhill SHIFNAL Shropshire TF11 8FA

Tel: 07976 080813

Email: andy@advance-planning.co.uk

South Staffordshire Council

Local Plans Team

Council Offices

Wolverhampton Road

Codsall WV8 1PX

Our Ref: ALP/SDL/GW/SITE139/Pub/2

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Dear Sirs

South Staffordshire Local Plan Review – Publication Plan

Seabridge Developments Limited –: Site 139 Pool View, Great Wyrley

1.0 Introduction

1.1 Seabridge Developments Limited continues to promote the site on behalf of the landowners and also owns part of the site.

1.2 It should be noted that the site is the subject of a joint full planning application submitted by the house-builder, Stonebond Properties and Seabridge Developments, for 52 dwellings with public open space, that is likely to be determined in the near future and prior to the Examination.

2.0 Representations

Policy DS5 (and Table 8) The Spatial Strategy to 2041

Spatial Strategy for Housing

- 2.1 We generally support the text that is highlighted at paragraph 5.14 of the Plan which confirms that *“the council’s preferred approach is Spatial Option 1 - **a capacity-led approach focusing growth to sustainable non-Green Belt sites and limited Green Belt development in Tier 1 settlements well served by public transport.”*** (emphasis added)

Settlement Hierarchy

- 2.2 Great Wyrley and Cheslyn Hay are conjoined Tier 1 settlements that independently and jointly offer a wide range of community services and facilities and also are close to significant employment areas. They are in a highly accessible location between Cannock to the north and the West Midlands conurbation less than 2km to the south at its closest point. They also benefit from excellent links to the local, regional and national road networks and also a rail link. Consequently, these two settlements represent a logical and sustainable location for housing growth.
- 2.3 We therefore support the settlement hierarchy approach that has been devised, (paragraphs 2.7 and 2.8 and Map 1). More particularly, **we support the Spatial Strategy set out in Policy DS5**, which states:...*“Throughout the district, growth will be located at the most accessible and sustainable locations in accordance with the settlement hierarchy set out below”* and, *“An integral part of the Strategy will be 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.....”*. The Policy also states that: *“It will also seek to maintain and enhance the natural and historic environment and the local distinctiveness of the district and retain and reinforce the current settlement pattern.”* (emphasis added)

Spatial Distribution of Housing Growth

- 2.4 Whilst we support the general spatial strategy and the release of suitable (free from significant constraints) Green Belt sites in Tier 1 settlements, we suggest that factors other than walking distance of railway stations (paragraph 5.19) should be taken into

account, and suggest that accessibility to employment opportunities and more particularly the proximity to schools and other community services, are just as important when assessing 'sustainability'.

Policy SA5 (and Appendix C Page 183) Housing Allocations

Site 139 – Pool View

- 2.5 In a District such as South Staffordshire, which is predominantly Green Belt, it is important to make best use of land that is not in the Green Belt. Site 139 was scrutinised and endorsed by the Council and the Inspector through the SAD plan-making process and it was subsequently removed from the Green Belt, placed within the Inset boundary for Great Wyrley and allocated for housing.
- 2.6 Circumstances have not changed since the allocation, other than for the development of two bungalows on Green Belt land immediately to the west, which merely serve to consolidate it within the urban confines of the settlement in this location.
- 2.7 **It therefore remains wholly appropriate that the allocation should be retained and carried forward in the emerging Local Plan (eLP) and we fully support and endorse its continued allocation, that will be delivered in the early part of the plan period, following the grant of planning permission, hopefully in the near future.**

Policy HC3 – Affordable Housing

- 2.8 **We note that the latest SHMA (2024) identifies an affordable housing requirement of around 28% in the North-Eastern Locality 3, nevertheless, we support the proposed affordable housing target of 30%.**

Policy HC14 Health Infrastructure

- 2.9 Health Infrastructure is rightly funded through the NHS and we are concerned that the requirements for potential financial contributions to the Integrated Care Board represents nothing more than another 'roof tax' on new housing.

- 2.10 The premise seems to imply that the provision of new homes will inevitably add to demands on Health Infrastructure that are not, or cannot otherwise be funded. It should be noted, however, that the Local Plan allocation is primarily to meet local housing needs. The requirement implies that all the future residents will be new to the area and not already 'in the system', but in reality, the opposite will be true – the majority of occupiers, especially first time buyers and the elderly, are already likely to be living in the area and therefore the new homes will not necessarily create additional pressures on health infrastructure.
- 2.11 In any event, the NHS already has responsibility to fund and provide care for residents of the development, whether they are already local to the area or not. It is therefore unclear how a developer can legally be required to contribute to the funding of NHS care that is entirely unrelated to the development. This view is supported by recent case law (*R. (on the application of University Hospitals of Leicester NHS Trust v Harborough DC) [2023] EWHC 263 (Admin)*)
- 2.12 In the circumstances, **we are compelled to object to Policy HC14.**

Policy NB6A Sustainable Construction

- 2.13 We do not consider that there is a clear and compelling evidence base to require carbon reduction measures over and above those introduced by the Government's recent changes to Building Regulations Part L (mid-2022) and its proposals for the Future Homes Standard (2025). Indeed, a Written Ministerial Statement by the Minister for Housing Planning and Building Safety on 13 December 2023 made it clear that *"the Government do not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale"*.
- 2.14 **We strongly object to Policy NB6A (A1-A5), which we consider is not justified and which will detrimentally impact on the viability and deliverability of new housing development in the District.**

3.0 Conclusions

- 3.1 We support the proposed spatial strategy which focuses growth to Tier 1 and to a lesser extent, Tier 2 settlements identified in Policy DS5.
- 3.2 We confirm that the SAD allocation Site 139 remains available for development and is being actively promoted through a full planning application, with a view to hopefully delivering new homes in early 2025. Accordingly, it should remain as a housing allocation.
- 3.3 We support Policy HC3, but we are compelled to object to Policy HC14 and also Policy NB6A.

Yours faithfully

Andy Williams

A J Williams Dip TP, MRTPI
Director