

South Staffordshire Local Plan Review

Regulation 19 Consultation May 2024

Prepared on behalf of Pland Estates Limited

Date: 30 May 2024

Ref. SS/LP01

Confidential

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1. Introduction

- 1.1 Knight Frank is instructed by Pland Estates Limited (PEL) to submit this representation in response to the South Staffordshire Local Plan Review (LPR) Regulation 19 (Town and Country Planning (Local Planning) (England) Regulations 2012) Consultation.
- 1.2 This representation is made in consideration of the following site:
 - **Land north of New Road, Featherstone**
- 1.3 This representation seeks to assist and support positive engagement between Knight Frank and South Staffordshire Council, particularly in relation to mutually beneficial opportunities by way of provision of additional residential dwellings including potential for a proportionate number of affordable units in a highly sustainable location.
- 1.4 The site was submitted as part of the previous Call for Sites and has been assessed in the most recent Strategic Housing and Economic Land Availability Assessment (SHELAA) and Sustainability Assessment (SA), with the reference no. 527.
- 1.5 It should be noted that the site that Pland Estates Limited are proposing, on land north of New Road, comprises the eastern part of the wider site, edged red on the site location plan at **Appendix A**, which was promoted as part of the Regulation 18 Consultation in 2021.
- 1.6 Since submission of the site to the Regulation 18 Consultation of the wider site, a planning application has been made for a proposed 100MW battery storage facility, edged orange (see Appendix A), planning application reference number 23/01031/OUT.
- 1.7 The residual area edged blue and previously promoted for a residential use is supported by PEL.
- 1.8 This representation responds to the LPR Publication Plan (Regulation 19) April 2024 and also considers the following evidence base documents:
 - Sustainability Appraisal (October 2022)
 - South Staffordshire Green Belt Study (2019), including addendum (2022)
 - Green Belt Exceptional Circumstances Topic Paper (2024)
 - Housing Site Selection Topic Paper (2024)
 - SHELAA (2023)
 - Duty to Cooperate Topic Paper (2024)

- 1.9 This representation has been prepared in consideration of the tests of soundness as set out in paragraph 35 National Planning Policy Framework (NPPF), including the requirements for a plan to be:
- 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*
 - 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*
- 1.10 As detailed within this representation, it is considered that the LPR has **not been positively prepared**, is **not justified** and is **not effective**. It is, however, acknowledged that the LPR has been amended to align with updated interpretations of the NPPF December 2023.
- 1.11 This representation has also considered if the Local Plan is either:
1. Legally compliant
 2. Sound
 3. Complies with the duty to co-operate
- 1.12 It is considered that the LPR is legally compliant and complies with the duty to co-operate to the extent of its interpretation in alignment with the NPPF December 2023. **However, the LPR is not considered to be sound.** Justification of the unsoundness of the plan are detailed within this representation.
- 1.13 The completed LPR Representation Form has been integrated into the representation in **Appendix B**.
- 1.14 This representation has been set up to respond to the LPR Publication (April 2024), whilst the evidence base has been considered in the appendices as follows:
- Appendix C – Review of the Sustainability Appraisal
 - Appendix D – Review of the Housing Site Selection Topic Paper

2. The site

Land north of New Road, Featherstone

- 2.1 The site, measuring ca 9 hectares, is located north of New Road, Featherstone, on primarily greenfield land. The site is surrounded by residential development to the south and south-east, agricultural fields to the west and an area of vegetated landscape to the north, including five separate fishing ponds.
- 2.2 The site comprises largely agricultural land, segregated by corridors of vegetation throughout the site and a residential dwelling with associated outbuildings of likely agricultural use in the south-eastern part of the site.
- 2.3 The site has potential for direct access off New Road and Cannock Road (A460) and is in proximity to bus services on New Road and Cannock Road, with bus services to Cannock and Wolverhampton. A public right of way (Bridleway – Featherstone 2) runs through the eastern part of the site, linking Cannock Road to Shareshill via public right of way Shareshill 13.
- 2.4 Featherstone, defined as a local service village, comprises a number of facilities and services in proximity to the site, including a health centre, community centre, leisure facilities, education facilities and various services.
- 2.5 The site lies within the green belt, outside of the defined Settlement Boundary.

3. South Staffordshire Publication Plan (Regulation 19 consultation) Representation

Introduction

- 3.1 This representation responds to the proposed policies in consideration of the requirement to meet the appropriate quantities of the local housing needs, particularly in sustainable locations that respond to the overarching spatial strategy set out in Chapter 4, strategic Objective 3 of the LPR.
- 3.2 In order to effectively and efficiently respond to the LPR, any recommended amendments to policies will be clearly set out and highlighted in **bold red**.

Plan period 2023 to 2041

- 3.3 Para 1.2 LPR states that the “*plan period for this Local Plan will be 2023-2041, although national policy requires the plan to be reviewed in whole or part every five years*”.
- 3.4 Para 22 NPPF requires strategic policies to “*look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (**at least 30 years**), to take into account the likely timescale for delivery*” (***emphasis added***).
- 3.5 The spatial strategy, defined by the housing target of 4,726 dwellings (Table 7 LPR), proposes three new major allocations within Tier 1 villages, including at Penkridge (1,109 dwellings as noted in Table 8 LPR), Codsall/Bilbrook (581 dwellings) and Cheslyn Hay/Great Wyrley (154 dwellings). Housing growth in Locality 1 (paras 5.25 to 5.27) notes that “*housing growth in this part of the district will be driven by a large-scale extension in the Open Countryside to the north of Penkridge*”. The proposed development at Penkridge (noted as 1,109 dwellings in Table 8 LPR and 1,029 dwellings at SA2), notwithstanding the inconsistency within the local plan of the number of proposed dwellings at Penkridge, aligns with para 22 NPPF by virtue of proposing a “*large-scale extension*” (para 5.26) which is considered to be a “*significant extension to existing villages*”, in this case, Penkridge. It is therefore considered that policies should be set to look further ahead by at least 30 years, which increases the plan period from 2023-2041 to 2023 to 2053. Otherwise, the local plan is not considered to be compliant with para 22 NPPF.

Chapter 4 vision and strategic objectives

- 3.6 This chapter sets out the vision for the district to cover the plan period (2023 to 2041), which equates to 18 years.
- 3.7 Strategic Objective 1 seeks to “*Protect the Green Belt and Open Countryside ensuring that where Green Belt release is proposed **in sustainable locations**, mechanisms are in place to secure compensatory improvements to the environmental quality and accessibility of the remaining Green Belt.*”

- 3.8 Please refer to Appendix D (Review of the Spatial Housing Strategy) of this representation. The Strategic Objective 1 should align with para 147 NPPF, in relation to the prioritisation of locations that are either on previously developed land and/or are well-served by public transport, which generally includes sites adjacent to or within settlements. It is therefore recommended to include “in sustainable locations” to contribute to making the local plan sound.
- 3.9 It is agreed that development proposals that require green belt release have potential for mechanisms to increase environmental quality, including achieving a net gain in biodiversity, as well as have the potential to create pedestrian and/or cycle links to the countryside.
- 3.10 Strategic Objective 2 seeks to “*Meet the housing and employment needs of the district whilst making a proportionate contribution towards the unmet needs of Greater Birmingham and Black Country Housing Market Area and wider Functional Economic Market Area. New housing will be focused on sustainable locations within the district, ~~with a particular focus on the district’s most sustainable Tier 1 settlements~~”.*
- 3.11 Whilst it is acknowledged that the focus on Tier 1 settlements for larger-scale development is likely suitable, it should not be generalised within the Strategic Objective 2, as sustainable locations can vary within Tier 1 settlements (i.e. varying locational distances to bus or railway services) and equally, there are considered to be further sustainable locations in lower Tier settlements. It is therefore recommended to remove the last part of the last sentence to contribute to making the local plan sound.
- 3.12 Para 67 NPPF requires strategic policy-making authorities to “*establish a housing requirement figure for their whole area (...) over the plan period*” and that “*the requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas*”. It is acknowledged that, within the LPR Duty to Co-operate Topic Paper 2024, a Statement of Common Ground (August 2022) is included between local authorities in addressing existing and emerging housing shortfalls within the GBBCHMA. It is expected that an updated Statement of Common Ground will be sought to inform the subsequent Examination in Public, particularly as significant events may have direct implications on housing delivery and unmet needs. This includes:
- Birmingham: Revised timetable for the Local Plan, delaying the preferred options consultation and subsequent publication period, with a projected need of over 7,100 dwellings per annum
 - Lichfield: Withdrawal of the Local Plan in October 2023, therefore unlikely to contribute to meeting unmet needs of the GBBCHMA for a considerable amount of time
 - Solihull: Significant delays during the Examination in Public of the Local Plan, with the most recent letter from the council (8 May 2024) indicating clarification required in relation to unmet needs arising out of Birmingham of 2,000 homes
- 3.13 The GBBCHMA, comprising all the authorities within, published a position statement in 2020 (third position statement; 3PS), which concluded that the contribution from submitted, examined and adopted local plans is around 8,600 dwellings, which falls short of the unmet needs within the Housing Market Area. The 3PS

covered the period between 2011 to 2031, therefore plan periods beyond these years have not been considered. However, the GBBCHMA published an addendum in April 2023, which considered the change in shortfall / surplus by each authority, concluding that there is a residual shortfall of 2,053 dwellings based on a housing need of 207,979 and a supply of 205,926 dwellings.

- 3.14 Appendix 2 of the 3PS Addendum (April 2024) provides a summary of GBBCHMA shortfall and potential contributions, concluding a total shortfall of 106,654 dwellings, also due to the withdrawal of the Black Country Plan and Birmingham's shortfall of 78,415 dwellings. It further notes that the GBBCHMA councils are able to contribute to unmet needs with 18,181 dwellings. However, with the reduction of 4,000 (South Staffordshire), 2,105 (Solihull) and 2,655 (Lichfield), the total contributions to meet unmet needs equates to 9,421 dwellings, which is nearly half of the previously proposed contributions.
- 3.15 In light of the majority of the shortfall arising from Birmingham, including the requirement of a 35% urban uplift, it is highly unlikely that the unmet needs within the GBBCHMA can be met in the near future. Therefore, it is considered that the removal of an additional 4,000 dwellings, as proposed in the South Staffordshire Local Plan, does not align with para 26 NPPF which explicitly states that "*joint working should help to determine where (...) development needs that cannot be met wholly within a particular plan area could be met elsewhere*".
- 3.16 The removal of the contribution of 4,000 dwellings is considered to make the plan unsound, as per the definition of para 35 NPPF, stating that plans should be "*positively prepared*" with a strategy to, as a minimum, "*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*".
- 3.17 It should be strongly considered that the site north of Featherstone, which would contribute to the local housing needs by providing ca 180 additional dwellings, is in a **sustainable location, with direct access to public transport** and within walking distance to the **facilities and services** provided within Featherstone, a Tier 3 settlement.

Development Needs and Spatial Strategy

- 3.18 Policy DS4 sets out the number of homes to be delivered within the proposed plan period up to 2041, with 4,726 homes to be provided including a 10% flexibility of additional homes. This includes a 640 home contribution towards unmet housing needs of the Greater Birmingham and Black Country Housing Market Area.
- 3.19 Policy DS5 seeks 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*". This includes a large-scale development at Penkrige, proposing 1,109 (or 1,029) new dwellings. It is noted that part of the draft allocation, as per detailed permission (ref. 19/00862/REM) for up to 200 dwellings (approved in April 2020) appears to be complete. It is not considered appropriate to include this part of the wider development as a

draft allocation, and therefore it is requested that this site, as per planning permission ref. 19/00862/REM for 200 dwellings is removed from the allocation.

- 3.20 It is noted that an outline planning application (ref. 23/01079/OUTMEI) for the delivery of up to 750 homes was submitted in December 2023 and a further outline planning application (ref. 23/01052/OUTMEI) for the delivery of 135 homes was submitted in December 2023, for a total of 885 homes. An outline planning application (ref. 17/00317/OUT) in the southern part of the allocation for 31 dwellings was refused in December 2017. It is noted that the south-eastern part of that site is within flood zones 2 and 3, which would, in addition to requirements such as 10% net gain in biodiversity, provision of open space and ancillary infrastructure, likely reduce the dwelling capacity to ca 20 dwellings.
- 3.21 It is therefore considered that the allocation north of Penkridge should be reduced to 905 dwellings, in line with the two outline applications and the potential for ca 20 dwellings in the southern part of the allocation. Notwithstanding the above reduction, the allocation north of Penkridge is still considered to be a large-scale development, which would need to consider para 22 NPPF in relation to the plan period.
- 3.22 As detailed in Appendix D, it is considered that the approach to only release Green Belt in or adjacent to Tier 1 settlements is **not justified**, and therefore the site on **land north of Featherstone should be included as a site allocation** due to its sustainable location with direct access to public transport and ability to incorporate additional uses to benefit the community i.e. local convenience.

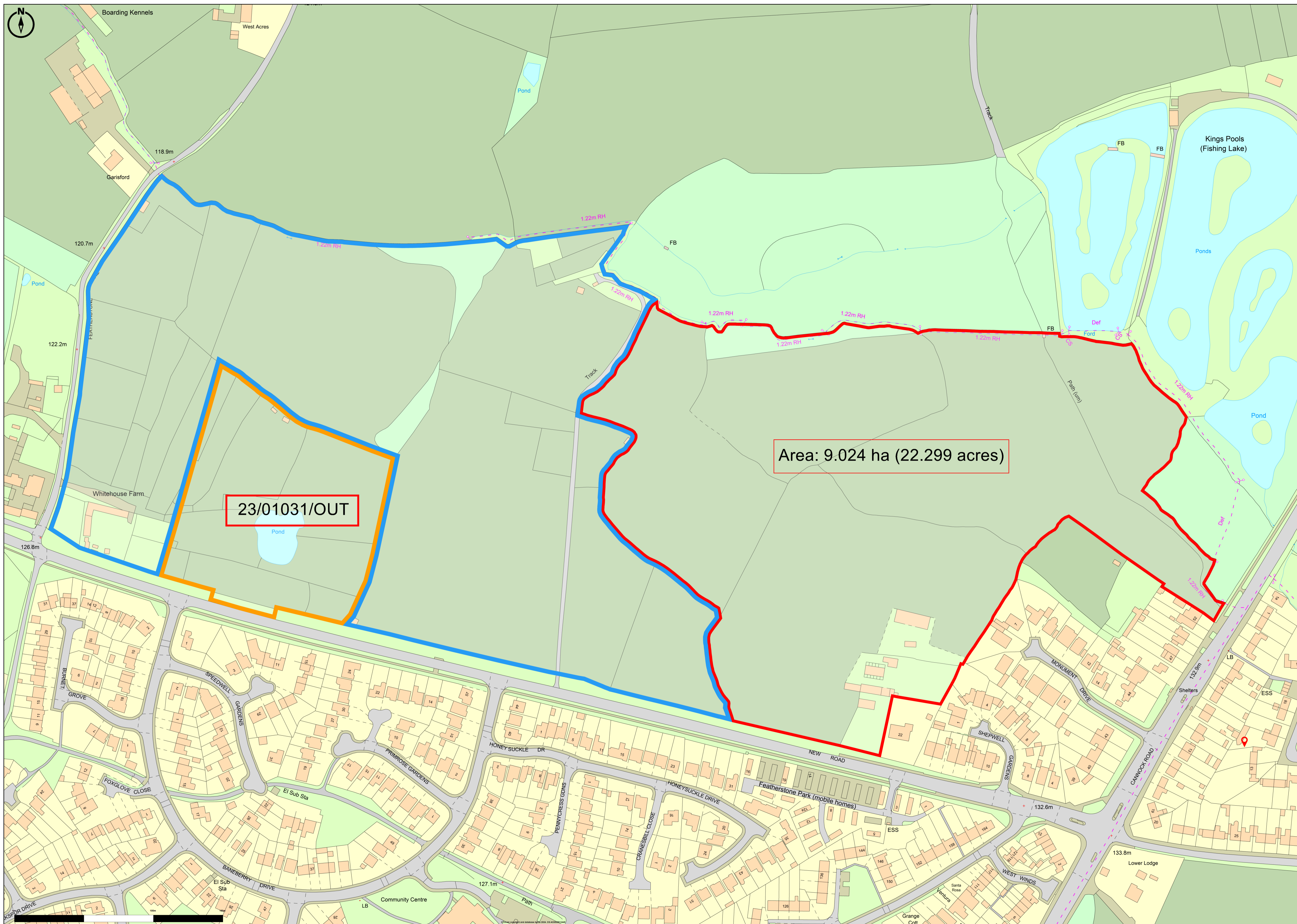
Policy SA3 Housing Allocations

- 3.23 The Spatial Strategy (policy DS5) includes additional allocations alongside the strategic development locations as set out in policies SA1 and SA2. This includes a number of allocations in Tier 1, 2 and 3 settlements, including Featherstone.
- 3.24 Policy DS5 states that Tier 3 settlements “*hold a smaller range of services and facilities than Tier 1 and 2 settlements and as such are given lesser level of growth. Limited growth in these smaller rural settlements will be delivered through appropriate allocations made in the Local Plan, consisting of suitable and deliverable non-green belt site allocations*”.
- 3.25 The justification for limiting green belt release to Tier 1 settlements is not inherently clear, as the settlement tiers do not directly correlate with the green belt and its five purposes as set out in para 143 NPPF. The key driver to site allocations should be locational sustainability, consideration of potential environmental constraints, deliverability, achievability and suitability. Furthermore, para 148 NPPF states that, “*when defining Green Belt boundaries, plans should:*
- a) *Ensure consistency with the development plan’s strategy for meeting identified requirements for sustainable development (...)*
- 3.26 It is considered that sustainable development is not only achieved at Tier 1 settlements, but can be achieved in sub-Tier 1 settlements, subject to immediate availability of public transport, services and facilities. Therefore, and in consideration of Appendix C and D of this representation as well as further details set out

in relation to the site north of Featherstone, SA3 should be amended to incorporate the land north of Featherstone as follows:

Tier 3 Settlements					
Site	Site ref no.	Use	Site location	Minimum capacity (dwellings)	Proforma Page Number
Featherstone East	527(a)	Residential	Land north of New Road	Ca. 180	To be included
Featherstone West	527(b)	Residential	Land north of New Road	Ca. 190	To be included
Featherstone Combined	527 (a + b)	Residential	Land north of New Road	Ca. 370	To be included

Appendix A Site Location Plan



Appendix B Publication Stage Representation Form

Part A

	1. Personal details	2. Agent's details
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Last Name	Parkinson-Witte	Bedekovic
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Part B

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is:

(1) Legally compliant Yes No

(2) Sound Yes No

(3) Complies with the Duty to co-operate Yes No

5. Please give details of why you consider the Local Plan is not legally compliant or 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.

Please refer to details set out in this representation including Appendix C and D.

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.

Please refer to details set out in this representation including Appendix C and D.

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)

Yes, I wish to participate in hearing session(s)

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

The matters raised as part of this representation outline how the draft Local Plan is not considered sound, and as such would require amendments to be made. Participation in the hearing session would ensure that the points raised in this representation can be further explored and detailed.

Appendix C – Review of the Sustainability Appraisal

A Sustainability Appraisal (SA) was prepared as evidence base to support the Local Plan, with an SA having been prepared at each stage, including Issues and Options (2018), Preferred Options (2021) and Regulation 19 (2022).

This review focuses on the most recent SA (2022), which includes an appraisal of the site at Land north of New Road, Featherstone (site ref. 527). It should be noted that the appraisal focuses on the wider site rather than on an individual basis, including the area in the eastern part of site ref. 527 as per the location plan in Section 2 of this representation (*see Appendix A*).

The SA Section H.2 lists the rejected residential sites, including site ref. 527, and reasons for rejecting reasonable alternative residential sites. It is noted that the site was directly compared to sites ref. 168 and 397. Site ref. 168 has been completed and should therefore not be considered as part of the proposed plan period 2023-2041.

With regards to site ref. 527, the key reasons were listed as follows:

- Green belt harm to the majority of land around the village
- Landscape sensitivity to the majority of land around the village
- Major negative impacts against education criteria
- Major negative impacts against landscape criteria, which may result in an unsustainable pattern of development
- Initial highways capacity concerns

It is noted that the South Staffordshire Housing Site Selection Topic Paper (2022) Appendix 3 states that the site is well contained by strong landscape boundaries. This is particularly the case for the eastern part of the wider site ref. 527.

Furthermore, the Green Belt purposes in relation to site ref. 527 have been degraded already by the incursion of development north of New Road and to the east of site ref. 527 by virtue of the residential development as well as to the west of 'Featherstone East' (edged red, Appendix A) by the pending application ref 23/01031/OUT for a 100MW battery storage facility.

The post-mitigation site assessment (Section G.4 SA) sets out impact matrices for all reasonable alternative site assessments. The following table includes the SA site assessment and the site assessment based on the eastern part of the site ref. 527, as set out in the location plan in Section 2 of this representation (*see Appendix A*).

The site assessment matrix parameters are defined as follows:

Assessment	Rating
+/- (mixed)	0
0 (Neutral)	0
- (minor negative)	-1
-- (major negative)	-2
+ (Minor positive)	+1
++ (major positive)	+2

No.	SA Objective	SA assessment	Proposed site assessment	Comments
1	Climate change mitigation	+/-	+/-	New development will likely require mitigation measures, including use of sustainable building fabrics, encouragement of sustainable modes of transport, including walking, cycling and use of local bus services.
2	Climate change adaptation	+	+	Suitable and sustainable drainage features can be incorporated where appropriate. The site is in flood zone 1.
3	Biodiversity & Geodiversity	0	+	The development of the site would require a net gain in biodiversity of 10% to be achieved. Potential detrimental impacts on biodiversity and geodiversity could be mitigated appropriately.
4	Landscape & Townscape	--	0	Whilst it is acknowledged that there will likely be some impacts on the green belt and landscape views, it should be considered that the site is well contained as noted in the Housing Site Selection Topic Paper and does not perform strongly to all purposes of the green belt. It is considered that mitigation measures can be incorporated to reduce potential detrimental impacts on the landscape, including additional landscape features.

No.	SA Objective	SA assessment	Proposed site assessment	Comments
5	Pollution & Waste	-	-	It is acknowledged that new residential dwellings will inherently produce some waste, albeit with potential impacts minimised where possible.
6	Natural Resources	-	0	The site is located on Grade 3 agricultural land. Its development would lead to a loss of green field land, albeit with a net gain in biodiversity achieved. Further, the site is considered to be located in a sustainable location, with immediate access to public transport and some facilities and services.
7	Housing	+	+	The site would deliver circa 180 additional residential units.
8	Health & Wellbeing	-	0	The site would provide opportunities to incorporate green infrastructure, including accessible open green space, and provision of a permeable pedestrian/cycle network within the site and to connect to the wider network, including providing direct access to public right of way (Bridleway) "Featherstone 2".
9	Cultural Heritage	0	0	There are no heritage assets in the vicinity, with one listed building located further to the west of the wider site.
10	Transport & Accessibility	-	0	The site has immediate access to bus services and potential to link to the public rights of way "Featherstone 2". It is understood that the Highways Department has raised initial concerns due to A460 capacity. However, this would be assessed in detail as part of a planning application and appropriate mitigation measures provided.
11	Education	--	-	The site has access to Featherstone Academy (primary school) and Strawberry Poppets (nursery) with no immediate

No.	SA Objective	SA assessment	Proposed site assessment	Comments
				access to a secondary school. However, it is considered that a development would provide financial contributions to improve capacities at existing schools.
12	Economy & Employment	+	+	The site has immediate access to public transport services. Further, the development would provide employment opportunities during construction.

Based on the above table, the following assessment matrix rating shows that the site, as per Appendix A, is considered to perform better than the initial SA assessment, with a rating of **+2** as opposed to the SA rating of **-5** (see below assessment matrix).

No	Assessment		Difference
	SA	RF Site	
1	0	0	-
2	+1	+1	-
3	0	+1	+1
4	-2	0	+2
5	-1	-1	-
6	-1	0	+1
7	+1	+1	-
8	-1	0	+1
9	0	0	-
10	-1	0	+1
11	-2	-1	+1
12	+1	+1	-
TOTAL	- 5	+2	+7

Appendix D – Review of the Spatial Housing Strategy Topic Paper

Overview

The Topic Paper notes that, “through plan development having considered the evidence and consultation responses a preferred spatial strategy has been identified. This is set out as Option I in this paper and will see 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”.

The strategy seeks to meet the council’s current housing requirement, including a 640 home contribution of unmet needs from the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). The council amended the previous strategy of incorporating a 4,000 home contribution of unmet needs from the GBBCHMA, reducing it to 640 homes, justified by the December 2023 changes to the NPPF. These changes also included para 145, which states that “*there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared*”.

Spatial Housing Strategy Option I (preferred strategy)

This option sought to meet the District’s own needs and provide a limited contribution towards the GBBCHMA, through sustainable non-Green Belt development and limited Green Belt development in Tier 1 settlements well-served by public transport. The council justifies this option due to the December 2023 NPPF changes stating that Green Belt boundaries are not required to be reviewed and, as set out in the topic paper, that the council’s approach “*balances this against the NPPF’s steer that, should Green Belt boundary changes be considered, first consideration should be given to areas well-served by public transport and previously developed land*”. This option also releases an amount of land within the wider open countryside, with a focus on deliverable land adjacent to Tier 1 settlements and neighbouring towns and cities.

Para 146 NPPF takes into account whether the preferred strategy

- a) “makes as much use as possible of suitable brownfield sites and underutilised land
- b) *Optimises the density of development (...) including whether policies promote (...) other locations well served by public transport*
- c) *Has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground*”

Whilst it is acknowledged that Tier 1 settlements are generally well served by public transport, particularly rail transport, this does not necessarily conclude that all new development adjacent to, within or around Tier 1 settlements will directly benefit from the availability of rail transport due to either distance to the site or lack of secondary or tertiary public transport (i.e. bus services) to link to the nearest railway station. The site allocation on land north of Penkridge (SA3) for example, lies over 1km from the nearest railway station with secondary public transport services required to be relocated and upgraded to provide sufficient public

transport links to the railway station and beyond. Whilst this may be delivered as part of the wider development, it is additional infrastructure that would need to be provided, that other development, located in areas with existing, suitable connectivity to public transport (primary or secondary), may not need to provide.

It is therefore not considered robustly justified that directing major development predominantly into Tier 1 settlements, including green belt locations, will lead to more sustainably located development.

Land north of Featherstone

The site lies within the green belt, adjacent to the Tier 3 settlement of Featherstone. The site has direct access to two bus stops (Baneberry Drive / Shepwell Gardens) with links to Cannock and Wolverhampton. It is noted that a draft allocation lies in the south west of Featherstone, adjacent to the settlement.

The green belt assessment study (LUC, 2019) notes that the Site Allocations DPD, adopted in 2018, amended the green belt boundary and inset villages to accommodate a number of allocated and safeguarded land sites, including land off Brinsford Lodge and land adjacent to Brinsford Lodge (sites no. 168 and 397), the latter of which scored “moderate” (Green Belt Study Addendum, LUC 2022) in terms of its harm rating on the green belt, whilst the site north of Featherstone scored “moderate-high” in the addendum, albeit noting that this refers to the wider site (ref. 527), which will inherently affect the score.

The Green Belt Assessment 2019 assessed parcel ref. S31, which included both site 527 and the site at Shareshill (396, 169) which inherently affects the assessment of the parcel contribution to Green Belt purposes.

The Spatial Strategy Topic Paper states that it proposes to limit Green Belt allocations to suitable sites “*in areas of the district best served by public transport, which the NPPF specifies are to be given first consideration for Green Belt release*” and notes that Tier 1 settlements are areas best served by public transport based on local evidence. As noted above, accessibility to public transport should not be solely defined by the Tier of the settlement, but on a case-by-case basis. The site north of Featherstone, adjacent to a Tier 3 settlement, has existing public transport services within its immediate surroundings, whilst the site north of Penkrige, a Tier 1 settlement, has no immediate, current public transport availability subject to the provision of additional infrastructure.

It is therefore considered that the tier’ed approach to releasing Green Belt land is **not justified** and should be done on a case-by-case basis, including considering the site on land north of Featherstone as an allocation for residential development.