

# Local Plan Representations

For Seabridge Developments Ltd | 23-063

Proposed allocation - Land north of Sycamore Way, Huntington



**Project:** 23-063  
**Site Address:** Land north of Sycamore Way, Huntington  
**Client:** Seabridge Developments Ltd  
**Date:** 31 May 2024  
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# Appendices

**EP1.** Site location plan



# 1. Introduction

- 1.1 This report sets out the representations of Seabridge Developments Ltd to the Pre-submission Draft of the South Staffordshire Local Plan Review 2023 – 2041.
- 1.2 These representations concern the settlement of Huntington. The settlement did not receive any allocations in the current adopted development plan, but this was as a direct result of the (then) recent development of the Littleton Coillery site. Given that we are now more than a decade on from the completion of the Littleton Colliery site, and bearing in mind the very low level of development provided in Huntington since that period, it is necessary to reconsider the future approach for Huntington. Huntington is a highly sustainable settlement with a wide range of existing services and good public transport links. If there is not to be a greater distribution of development and additional allocations in Huntington in this plan, then Seabridge Developments Ltd would strongly advocate that there should be a higher level of housing growth and additional allocations in the next plan.
- 1.3 Our client is promoting the land north of Sycamore Way, Huntington for residential development. The site comprises previously developed land and would provide a logical and well contained extension of Huntington, and is capable of delivering dwellings to meet South Staffordshire’s housing needs and those of the wider GBBCHMA. We therefore respectfully request that it is considered a new allocation through the Local Plan Review. Alternatively, if the site is not allocated in the current Local Plan Review, we request that it is considered for an allocation through the next plan review.



## 2. Response to Policies

### Policy DS5: The Spatial Strategy to 2041

#### Distribution of development to Huntington / Tier 2 settlements

- 2.1 Huntington is a highly sustainable settlement with a wide range of existing services and good public transport links, as demonstrated through the Rural Services and Facilities Audit (RSFA) 2021. Future development could enhance and sustain those services.
- 2.2 Huntington is a Tier 2 settlement in the plan. However, the level of development apportioned to Huntington in Table 8 of the plan is only 41 dwellings, comprising 2 existing commitments and just 39 dwellings from a single allocated site (the current safeguarded land). This is significantly less development than other Tier 2 settlements within the plan, namely Womborne (296 dwellings), Perton (370 dwellings), Kinver (143 dwellings) and Brewood (64 dwellings). The amount of development proposed is even less than the Tier 3 settlements Coven (51 dwellings) and Featherstone (35 dwellings), which each have allocations in the plan.
- 2.3 Paragraph 5.39 of the draft plan states:
- “Housing growth in the village will be limited to existing planning permissions and the safeguarded land previously identified adjacent to the village. This approach recognises that Huntington is a Tier 2 settlement and therefore Green Belt release would not align with the spatial strategy which focuses Green Belt release only on the most sustainable Tier 1 settlements. This also recognises the relative level of services and facilities in Huntington compared to some other settlements in the district and potential for impacts on the nearby Cannock Chase AONB.”
- 2.4 We recognise that the AONB is a constraint, but there are potential options for development that would have a limited impact upon the AONB owing to the location and characteristics of the land in question (for example, our client’s land to the north of Sycamore Way – see section 6 of this statement).
- 2.5 Huntington currently does not receive any provision for housing or allocations in the current development plan. However, the current Local Plan released land from the Green Belt at Huntington (safeguarded for future development), recognising the role of the settlement and the need to provide development there. It should also be noted that the absence of allocations in the current development plan was not due to constraints in Huntington such as AONB or Green Belt; rather, it was because of the previous level of development provided at the Littleton Colliery site, a site which delivered more than 300 dwellings and significant new community infrastructure shortly before the South Staffordshire Core Strategy (SSCS) was



adopted in 2012. This is noted at paragraph 120 of the Inspector’s report on the Site Allocations Document (SAD), which states:

“Huntington is designated as a LSV in the SSCS, but it makes no provision for additional housing here, largely due to the nature and extent of redevelopment which took place at the former Littleton Colliery site before its adoption. This area has now been fully redeveloped with housing and associated uses and it is no longer possible or necessary to keep the land permanently open since it no longer performs Green Belt purposes. The SAD therefore proposes to amend the development boundary of Huntington to incorporate this redeveloped area. This is fully justified and provides an effective and soundly based approach to this redeveloped area, as well as providing the exceptional circumstances to justify removing the site from the Green Belt.”

- 2.6 Given that we are now more than a decade on from the completion of the Littleton Colliery site, and bearing in mind the very low level of development provided in Huntington since that period, it is necessary to reconsider the future approach for Huntington, reflecting its status as a Tier 2 settlement and to ensure local needs are met. As a sustainable location, the village is also capable of making a meaningful contribution to addressing unmet need within the GBBCHMA.
- 2.7 It is therefore considered that the settlement of Huntington is a sustainable location that is capable of accommodating a higher level of housing growth. If there is not to be a greater distribution of development and additional allocations in Huntington in this plan, then Seabridge Developments Ltd would strongly advocate that there should be a higher level of housing growth and additional allocations in the next plan.

### Policy SA3: Housing Allocations

- 2.8 Our client proposes an omission site for allocation (land north of Sycamore Way, Huntington). Full details of the site are provided at Section 3 of this statement (below).



# 3. Proposed Allocation – Land north of Sycamore Way, Huntington

## The site

- 3.1 The site comprises approximately 3.7 hectares and is located to the north of the Tier 2 settlement of Huntington. It is bound by residential development to the south (the housing north of Sycamore Way), the A34 to the west, a cattery, commercial uses and stabling to the north-west, fields in equine use to the north (a separate facility from the subject site), and agricultural fields to the east. A site location plan is provided at Appendix **EP1**.
- 3.2 The site is currently in equine use and comprises stables, a manege and paddocks used for the grazing of horses. The site is a single planning unit and comprises previously developed land. Further details in relation to the status of the land as previously developed are provided below under a separate sub-heading.
- 3.3 The site is currently located within the Green Belt and the Cannock Chase Area of Outstanding Natural Beauty (AONB). These matters are addressed further below.

## Previously developed land

- 3.4 The definition of previously developed land as provided within the Framework is as follows:

“Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.”
- 3.5 The buildings on site are not agricultural and clearly fall under the definition of previously developed land. In consideration of whether the paddocks used for the keeping and grazing of horses also comprise previously developed land, it is necessary to consider the extent of the planning unit, with the planning unit being the physical area against which the materiality of a change of use is assessed. Legal authority on the matter is set out in *Burdle v Secretary of State for the Environment* [1972] 3 All E.R. 240, 244. The judgement establishes three tests for determining the extent of a planning unit, as follows:



- First, whenever it is possible to recognise a single main purpose of the occupier's use of his land to which secondary activities are incidental or ancillary, the whole unit of occupation should be considered.
- Secondly, it may equally be apt to consider the entire unit of occupation even though the occupier carries on a variety of activities and it is not possible to say that one is incidental or ancillary to another. This is well settled in the case of a composite use where the component activities fluctuate in their intensity from time to time but the different activities are not confined within separate and physically distinct areas of land.
- Thirdly, it may frequently occur that within a single unit of occupation two or more physically separate and distinct areas are occupied for substantially different and unrelated purposes. In such a case, each area used for a different main purpose (together with its incidental and ancillary activities) ought to be considered as a separate planning unit.

3.6 We also refer to appeal reference APP/V1505/W/22/3296116 concerning the redevelopment of a dwelling and equestrian facility for residential development at land at Maitland Lodge, Southend Road, Billericay. The site was located in the Green Belt and in considering whether the proposed development would be inappropriate the Inspector considers to what extent the site can be considered previously developed land. The extent of PDL in this case is considered by the Inspector at paragraph 9 of the decision letter:

“The GB land provides equestrian facilities, other buildings or built form and paddocks directly linked to the equestrian facilities and forming part of the curtilage of the equestrian buildings. The Framework states that the curtilage of developed land can be considered as, but is not necessarily, previously developed land (PDL). In this instance, the functional relationship of the paddocks to the developed stables and other buildings on the site is clear. The paddocks themselves include some built form and are a human intervention on the site. It is also common ground, and I agree, that none of the appeal site is in agricultural use. The residential garden areas to Maitland Lodge are within the part of the appeal site that is within the built-up area of Billericay. These are not, therefore PDL, as defined by the Framework. However, these areas are outside of the GB. I therefore agree with the appellant and the Council, who under cross-examination conceded this position, that all of the GB land within the appeal site is PDL.”

3.7 The extent of the land which was found to comprise previously developed land is shown on the aerial photograph below at Figure 1.







**Figure 1: Extent of land determined to be previously developed land under APP/V1505/W/22/3296116**

3.8 We also refer attention to appeal reference APP/B1930/W/23/3323099 concerning residential development at land to rear of 42-100 Tollgate Road, Colney Heath, St Albans. The property comprised a dwelling, garden and equestrian facility, including paddocks, located within the Green Belt. In this case the Inspector considers whether the site can be considered as PDL in its entirety, with the dispute between parties relating to whether the open fields associated with the facility comprise part of the curtilage of the stables and therefore PDL. The Inspector concludes as the planning permission for the stables and associated grooming and storage facilities included the whole site, that the fields formed part of the curtilage of the stables and in accordance with the definition provided within the Framework, was PDL, with the Inspector concluding:

“Therefore, whilst the majority of the appeal site comprises green fields and is patently not ‘brownfield’ in character or appearance, I agree that because the fields form part of the same curtilage as the stables, the whole of the appeal site meets the definition of PDL in the Framework.”

3.9 The extent of the land which was found to comprise previously developed land is shown on the aerial photograph below at Figure 2.





Figure 2: Extent of land determined to be previously developed land under APP/B1930/W/23/3323099

3.10 From those two recent appeal decisions, the following are taken as important material considerations to the determination of whether land subject to a planning application is to be considered previously development land:

- That the land is part of the curtilage of the built form.
- The functional relationship between the built form and the curtilage.
- The extent of human intervention on the curtilage land.

3.11 In relation to the land north of Sycamore Way Huntington, the site falls under one ownership and is occupied for a single purpose (equine use). The operation of the stables, manege and paddocks are physically and functionally related to one another, and the use of the existing buildings is intrinsically linked to the operation and use of the paddocks.



3.12 On this basis the site cannot be considered to constitute a greenfield site. The paddocks used for the keeping and grazing of horses also comprise previously developed land. This is important in the context of national Green Belt policy, which is clear that where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport.

### Green Belt considerations

3.13 For the reasons set out in our response to Policy DS5, we consider that additional development should be apportioned to Huntington, and in the absence of non-Green Belt alternatives in the village this comprises the exceptional circumstances for Green Belt release.

3.14 As referred to above, paragraph 147 of the Framework states:

“where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport.”

3.15 As the site comprises previously developed land, it should be given first consideration for release. The site is also extremely well-served by public transport for a village location.

3.16 In terms of the Green Belt purposes, the development of the site would result in the village expanding north, which would impact upon Green Belt purpose c (safeguarding the countryside from encroachment). However, the impact would be limited by the containment of the site, in terms of existing field boundaries which would be respected (with boundaries strengthened through new landscaping) and the existing topography, with the site being relatively well contained from the wider Green Belt. It is considered that the development of the site would have little if any impact on the purposes of the Green Belt.

### AONB considerations

3.17 We propose that an allocation of the site for approximately 50-60 dwellings would not comprise major development in the AONB for the purposes of paragraph 183 of the Framework, considering the context of Huntington as a large village of 1,837 dwellings (2011 census), the context of the site as previously developed land containing equine buildings, and the wider context of the site including the adjacent commercial development to the north-west. Furthermore, taking into account the existing topography and the potential for an appropriately designed scheme including landscaping, the development of the site would not have a significant adverse impact on the purposes for which the area has been designated as an AONB (conserving and enhancing its natural beauty).



3.18 Without prejudice to the above, should it be considered that a proposed allocation would comprise major development within the AONB, we consider that exceptional circumstances can be demonstrated, in terms of the need for the proposed development and the limited impact that it would have upon the AONB.

## Accessibility

3.19 Huntington is a highly sustainable settlement with a wide range of services, including a primary school, doctors' surgery, pharmacy, community centre, convenience store, open space / sports pitches and employment opportunities. There are also excellent bus links to Cannock and Stafford, with a half-hourly service in either direction, plus additional bus services to other locations.

## Proposed allocation

3.20 The site could accommodate a residential development of approximately 92 dwellings, based on a gross density of 25 dwellings per hectare across the entire site. However, the site is promoted at this stage for approximately 50-60 dwellings, based on a lower density scheme contained to the paddocks and buildings to the west of the site. Further details can be provided if a need for additional allocations is identified.

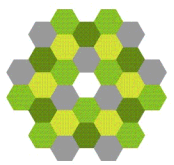
## Summary & Conclusions

3.21 The site comprises previously developed land and provides an excellent opportunity to expand the village of Huntington in a sustainable way. No technical constraints exist which could not be adequately addressed or mitigated as part of the proposed development.

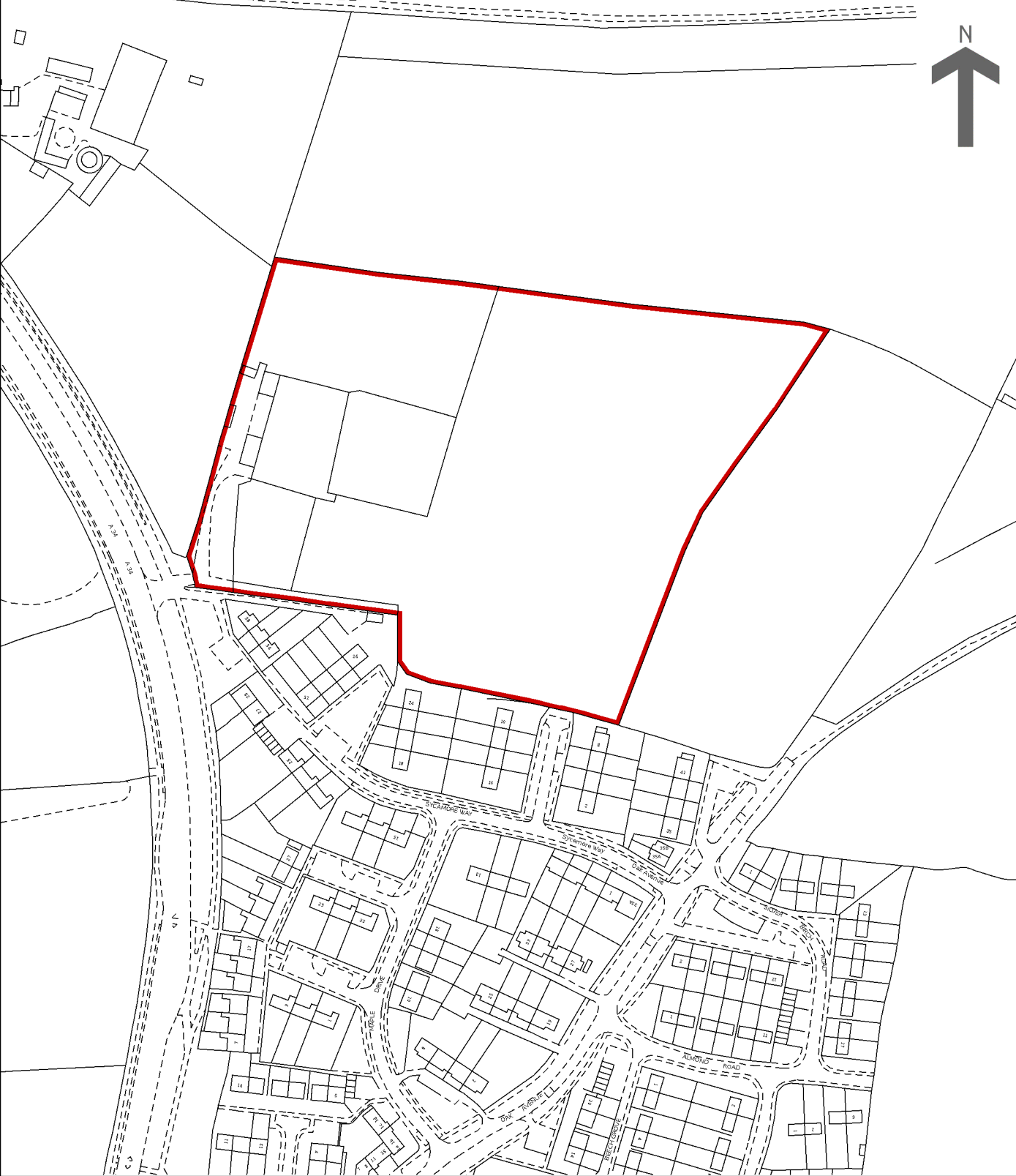
3.22 The site is suitable, achievable and available, and would be deliverable in the short term. It is capable of delivering dwellings to meet South Staffordshire's housing needs and those of the wider GBBCHMA. We therefore respectfully request that it is considered a new allocation through the Local Plan Review. Alternatively, if the site is not allocated in the current Local Plan Review, we request that it is considered for an allocation through the next plan review.



EP1



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