

SOUTH STAFFORDSHIRE LOCAL PLAN REVIEW

'PREFERRED OPTIONS' CONSULTATION RESPONSE (NOVEMBER 2021)

LAND AT FOUR ASHES ROAD, BREWOOD

ON BEHALF OF FOUR ASHES ROAD LTD

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004**

CONTENTS

1. INTRODUCTION
2. CONTEXT
3. WHAT DOES THE LOCAL PLAN NEED TO CONSIDER?
4. DEVELOPMENT STRATEGY
5. SITE ALLOCATIONS
6. DEVELOPMENT MANAGEMENT POLICIES

1. INTRODUCTION

- 1.1 This representation is made by Max Planning on behalf of Four Ashes Road Ltd (hereafter referred to as 'FAR Ltd') to the South Staffordshire Local Plan Review, Preferred Options consultation. This representation relates to land off Four Ashes Road, Brewood, which FAR Ltd is promoting for a residential development.
- 1.2 The representations are framed in the context of the requirements of the Local Plan to be legally compliant and sound. The tests of soundness are set out in the National Planning Policy Framework (NPPF), paragraph 35. For a Plan to be sound it must 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; 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.
- 1.3 The representations also consider the legal and procedural requirements associated with the plan-making process.

2. CONTEXT

- 2.1 The South Staffordshire Local Plan comprises the Core Strategy (adopted December 2012) and the recently adopted Site Allocations Document (Adopted September 2018). The Site Allocations Document (SAD) commits South Staffordshire to carrying out an early review of the Local Plan to respond to the increasing need for development, both within South Staffordshire and in their neighbouring authorities which form the Greater Birmingham Housing Market Area (GBHMA). South Staffordshire District Council has determined that the Local Plan Review will cover the period to 2037.
- 2.2 FAR Ltd supports the Council's proactive approach to commencing a review of the Local Plan to ensure an up-to-date policy framework exists within the District to guide growth to 2037 and to ensure development is genuinely plan led.

3. WHAT DOES THE LOCAL PLAN NEED TO CONSIDER?

Question 1: Do you agree that the evidence base set out in Appendix A is appropriate to inform the new Local Plan? Yes/No

Please provide comments on the content or use of the evidence base set out in Appendix A, referencing the document you are referring to.

- 3.1 The documents as set out in Appendix A identifies a range of evidence relied upon by the Council to inform the preparation of the new Local Plan.
- 3.2 FAR Ltd agree that the evidence base has been appropriately assessed to inform the new Local Plan. FAR Ltd is pleased to see that the Black Country and South Staffordshire Green Belt Study and Landscape Sensitivity Study published in 2019 has been undertaken to ensure that site suggestions are considered rather than just broad parcels of land. It is acknowledged within the South Staffordshire Green Belt Study and Landscape Sensitivity Study that the Site Allocations Document (SAD), adopted in 2018, amended the Green Belt boundary around inset villages to accommodate a number of allocated and safeguarded land sites, including Brewood (b) – land at Four Ashes Road.
- 3.3 FAR Ltd is pleased that the Housing Site Selection Topic Paper prepared in September 2021 has confirmed that land at Four Ashes Road, (referred to as part of Site 617) is non-Green Belt and needs to be proactively explored for its potential to assist in meeting the District’s proposed housing target.
- 3.4 FAR Ltd is also pleased that the Council has had regard to evidence that will inform an updated Infrastructure Delivery Plan, including input from key stakeholders outside the District where necessary.

Question 2: (a) Do you agree that the correct infrastructure to be delivered alongside proposed site allocations been identified in the IDP? Yes/No

(b) Is there any other infrastructure not covered in this consultation document or the IDP that the Local Plan should seek to deliver? Yes/No

- 3.5 FAR Ltd agrees that the infrastructure projects to be delivered in relation to the proposed site allocations has been identified correctly in the IDP.
- 3.6 FAR Ltd considers that there are no further infrastructure options that need to be considered.

Question 3: a) Have the correct vision and strategic objectives been identified? Yes/No

b) Do you agree that the draft policies (Chapters 4 and 5) and the policy directions (Chapter 6) will deliver these objectives? Yes/No

- 3.7 Whilst FAR Ltd agrees with the overall vision and strategic objectives identified within the Local Plan, it should be recognised that around 80% of the South Staffordshire District is designated Green Belt, therefore, there is the issue of 'protecting the Green Belt and Open Countryside' as stipulated within Strategic Objective 1. National Policy requires exceptional circumstances to be demonstrated in order to justify the release of Green Belt land for development. It does not advocate compensatory improvements to other elements of the Green Belt in order to justify or mitigate such release.
- 3.8 FAR Ltd agrees that in light of the emerging housing requirement of the District and as part of Strategic Objective 2, new development should be focused on sustainable locations and removal of land from the Green Belt would make a proportionate contribution towards the unmet needs of the Great Birmingham Housing Market Area.
- 3.9 Safeguarded land allocations identified in Policy SAD3 are not strategic in size and there are no reasons why their delivery should be brought forward sooner to provide a helpful boost to delivery in the early years of the plan period which would help to support longer-term delivery of strategic sites that may experience longer lead in times to delivery.
- 3.10 FAR Ltd agree with the draft policies within Chapters 4 and 5 and the policy directions within set out in Chapter 6 will deliver these objectives.

Question 4: Do you support the policy approach in Policy DS1 – Green Belt and Policy DS2 – Open Countryside? Yes/No

If no, please explain how these policies should be amended?

- 3.11 FAR Ltd supports the policy approach in Policy DS1 (Green Belt) and Policy DS2 (Open Countryside).

4. DEVELOPMENT STRATEGY

Question 5: Do you support the policy approach in Policy DS3 – The Spatial Strategy to 2038? Yes/No

If no, please explain how this policy should be amended?

- 4.1 FAR Ltd supports the policy approach in Policy DS3 (The Spatial Strategy to 2038). By allowing growth in the Tier 1 and Tier 2 settlements will provide an opportunity to meet locally arising housing needs and offers opportunity to deliver new services, facilities and infrastructure that would assist in addressing local issues and provide community benefit for residents.
- 4.2 The Spatial Strategy provides the opportunity to ensure that the necessary homes, along with supporting infrastructure, would be delivered in a timely and coordinated manner, to meet both the local needs arising from within the District, alongside those arising from the wider Great Birmingham Housing Market Area.
- 4.3 FAR Ltd is pleased to note that the Spatial Strategy will be delivered through allocations made in the Local Plan and it is considered that these represent appropriate high-level options to inform a preferred spatial strategy for housing growth.

Question 6: Do you support the policy approach in and Policy DS4 – Longer Term Growth Aspirations for a New Settlement? Yes/No

If no, please explain how this policy should be amended?

- 4.4 FAR Ltd supports the policy approach in Policy DS4 (Longer Term Growth Aspirations for a New Settlement).

5. SITE ALLOCATIONS

Question 8:

Do you support the proposed housing allocations in Policy SA5? Yes/No

Please reference the site reference number (e.g site 582) for the site you are commenting on in your response.

- 5.1 FAR Ltd supports the proposed housing allocations in Policy SA5, in particular, site reference 617 at land at Four Ashes Road in Brewood which is a Tier 2 Settlement and would provide a minimum capacity of 63 dwellings.
- 5.2 FAR Ltd is in control of Land off Four Ashes Road which is promoted for residential development. Approximately 3 hectares is identified as safeguard land, through the Site Allocations Document (ref: 055 and 068). This land has been removed from the Green Belt and earmarked for consideration to meet the development needs in the new Local Plan.
- 5.3 As mentioned in Section 3, this site will assist in meeting the District's proposed housing targets and represents a logical and sustainable extension to the sustainable settlement of Brewood. This site provides an opportunity for delivering new homes with associated supporting infrastructure.
- 5.4 Paragraph 5.6.6 of the Housing Site Selection Topic Paper prepared in September 2021 states:

"The site assessment process had revealed no unmitigable constraints to the delivery of the safeguarded land element of Site 617, other than the distance of parts of the site from local schools. However, this element of the wider site is non-Green Belt and was considered suitable for safeguarding through the examination of the Site Allocations Document in 2018 and is the closest area of the wider land parcel to the adjacent village. Therefore, this is not considered to be a barrier to development in this instance, particularly as failure to allocate the sites could result in the need for further Green Belt release around these settlements."

- 5.5 FAR Ltd intends to undertake further technical work to demonstrate the deliverability of land off Four Ashes Road, however, information gathered to date concludes that there are no physical or other constraints likely to render the site undeliverable within the proposed Plan period to 2037. The site is available now, therefore, this site could start to deliver homes and associated community benefits within the next 3 to 5 years.

6. DEVELOPMENT MANAGEMENT POLICIES

Question 11:

Do you agree with the proposed policy approaches set out in Chapter 6?

Yes/No

If no, then please provide details setting out what changes are needed, referencing the Policy Reference number (e.g HC1 - Housing Mix).

- 6.6 FAR Ltd agree with the proposed policy approaches set out in Chapter 6 and do not anticipate any changes are needed.

Question 12:

a) It is proposed that the fully drafted policies in this document (Policies DS1-DS4 and SA1-SA7) are all strategic policies required by paragraph 21 of the NPPF. Do you agree these are strategic policies? Yes/No

b) Are there any other proposed policies in Chapter 6 that you consider should be identified as strategic policies? Yes/No

If yes, then please provide details including the Policy Reference (e.g HC1 – Housing Mix)

- 6.7 FAR Ltd do not consider there to be any other proposed policies in Chapter 6 which should be identified as strategic policies.
- 6.8 FAR Ltd agree that the proposed fully drafted policies DS1-DS4 and SA1-SA7 are all strategic policies required by Paragraph 21 of the NPPF.