

	<p>Local Plan Publication Stage Representation Form</p>	<p>Ref:</p> <p>(For official use only)</p>
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Name of the Local Plan to which this representation relates:

**South Staffordshire Council
Local Plan 2023 - 2041**

Please return to South Staffordshire Council by 12 noon Friday 31 May 2024

This form has two parts –
 Part A – Personal Details: need only be completed once.
 Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

2. Agent's Details (if applicable)

Title	<input type="text"/>	<input type="text" value="Miss"/>
First Name	<input type="text"/>	<input type="text" value="Jessica"/>
Last Name	<input type="text"/>	<input type="text" value="Graham"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Associate Director"/>
Organisation (where relevant)	<input type="text" value="Taylor Wimpey UK Limited"/>	<input type="text" value="Savills (UK) Limited"/>
Address Line 1	<input type="text"/>	<input type="text" value="55 Colmore Row"/>
Line 2	<input type="text"/>	<input type="text" value="Birmingham"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text" value="B3 2AA"/>
Telephone Number	<input type="text"/>	<input type="text" value="0121 634 8494"/>
E-mail Address (where relevant)	<input type="text"/>	<input type="text" value="jgraham@savills.com"/>



Part B – Please use a separate sheet for each representation

Name or Organisation:

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	<input type="checkbox"/>	No	<input type="checkbox"/>
(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
(3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

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

We **object** to Draft Policy SA3 and consider that Land North of Linthouse Lane should be included as a strategic development location.

As our separate response to Draft Policy DS5 states, we **object** to the proposed spatial strategy and level of growth being planned for to meet local and wider housing market area needs.

Land North of Linthouse Lane (site reference 486c or 2022 draft Policy SA3) was identified in the Preferred Options (November 2021) and Pre-Submission Publication Plan (November 2022) consultation documents to deliver residential-led growth adjacent to the Black Country urban area in order to assist in meeting the housing shortfall arising from the Greater Birmingham and Black Country Housing Market Area ('GBBCHMA'). The site was allocated to deliver a minimum of 1,200 homes during the plan period (1,976 overall), a community hub, a new primary school, a community park, sports pitches and a network of green and blue infrastructure. The benefits of the proposed allocation are discussed further in this response.

Exceptional Circumstances

The Green Belt Exceptional Circumstances Topic Paper (November 2022) outlines the exceptional circumstances which justified the removal and allocation of Land at Linthouse Lane. Paragraphs 4.5 to 4.8 stated that "There are insufficient non green belt site within close proximity to the Black Country combination to meet the spatial strategy requirements, especially taking into account the contribution of 4000 homes the plan is seeking to make towards the unmet housing needs of the GBBCHMA. There are no non-Green Belt land options in this broad location that could accommodate a similar level of development and the site is in an area of lesser Green Belt harm and landscape sensitivity than other large site options in this broad location, whilst many other smaller site options are affected by significant constraints. Therefore,

the release of Green Belt land on the northern edge of the Black Country is required. Land North of Linthouse Lane has been demonstrated to be the most appropriate site option through the site assessment process [Savills Emphasis Added].

As demonstrated in our responses to Draft Policy DS4 and DS5, the Site benefits from its close proximity to the Black Country, is in a highly sustainable location and was previously assessed as the most appropriate site option for the release of Green Belt on the northern edge of the Black Country. It is therefore considered that, as SSDC's change in strategy is not sound, the housing requirement and contribution towards the GBBCHMA should be increased. It is therefore considered that there are still exceptional circumstances which exist to justify the removal of the Site from the Green Belt and allocate it for development.

Paragraph 147 of the NPPF states that when Green Belt release is required then "first consideration should be given to land which has been previously developed and/or is well-served by public transport". This is only a 'first consideration' and does not mean sites which do not meet all of these criteria can still be considered for release. One of the benefits of the proposed allocation is the site's "proximity to public transport links towards employment opportunities and the Black Country urban area". The Council has stated that Green Belt release is required and therefore Land North of Linthouse Lane should be given 'first consideration', despite this there is no justification for the removal of the allocation.

We therefore **object** to Draft Policy SA3 as it is not positively prepared or justified as required by paragraph 35 of the NPPF.

Site Assessment Comparison

Land North of Linthouse Lane is assessed in the Sustainability Appraisal (2024) at Table H.2.1 (Impact matrix of all reasonable alternative site assessments pre-mitigation) and Table H.4.1 (Impact matrix of all reasonable alternative site assessments post-mitigation). The Site performs better overall, specifically against the economy and employment objectives, than the proposed allocation 'Land to the East of Bilbrook' (Site Reference 519) both pre- and post-mitigation in Appendix H of the Sustainability Appraisal (2024).

Despite this, in Appendix I of the Sustainability Appraisal (2024) the justification for removing the draft Linthouse Lane allocation is that "the site is not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy". However, Appendix H of the Sustainability Appraisal (2022) states in the outline reasons for selection that "the site is considered to perform better than other site options and failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence as set out in the Duty to Co-operate correspondence".

As set out earlier in our response, there were previously exceptional circumstances identified to justify the removal of the site from the Green Belt and allocation and it is considered that these still remain. The assessment in the Sustainability Appraisal (2024) shows that the site performs comparatively, if not better, than proposed strategic development locations in the 2024 draft plan. Furthermore, the Council previously found that "failing to consider such areas for development may result in an unsustainable pattern of development". The Council has not considered all reasonable alternatives when assessing Spatial Option I and the sustainability of settlements outside of SSDC. The Plan has therefore not justified or sound (paragraph 35 of the NPPF).



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.

The Council's evidence continues to support the proposed allocation of Land North of Linthouse Lane (site reference 486c or 2022 draft Policy SA3). We request that Land North of Linthouse Lane is included as a strategic development location to deliver a minimum of 1,200 dwellings during the plan period (1,976 overall), affordable housing and a specialist elderly housing element, a community hub, a transport/movement strategy which includes access onto Linthouse Lane, Blackhalve Lane and Kitchen Lane, a new primary school, flexible community space, a community park, sports pitched and green and blue infrastructure.

(Continue on a separate sheet /expand box if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

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)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

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

To provide oral evidence and engage in the Examination discussions on this matter.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However, your contact details will not be published.

Data Protection



South Staffordshire Council

Your details will be added to our Local Plans Consultation database so that we can contact you as the review progresses. South Staffordshire Council will process your personal data in accordance with the Data Protection Act 2018 and the General Data Protection Regulations (GDPR). Our Privacy Notice can be viewed at [Data Protection \(Strategic Planning\) | South Staffordshire District Council \(sstaffs.gov.uk\)](#)

Please return the form via email to localplans@sstaffs.gov.uk or by post to South Staffordshire Council, Community Hub, Wolverhampton Road, Codsall, South Staffordshire WV8 1PX