

# **SOUTH STAFFORDSHIRE LOCAL PLAN 2018-2038 REGULATION 18 CONSULTATION**

**Representations on behalf of IM Land**

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## REPORT

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# 1 INTRODUCTION

- 1.1 RPS Consulting Services Ltd ('RPS') has been commissioned to prepare representations on the South Staffordshire Local Plan Preferred Options Document ('POD') (Regulation 18) draft on behalf of IM Land ('IML'), with respect to their interests on 'Land at Limepit Lane, Huntington' ('the Site'). To be clear, the submissions set out here are in response to the Council's inclusion of land north of Limepit lane ('preferred allocation site') in the POD. A separate response to the POD has been prepared in respect of the outstanding areas of land being promoted by IM land through the local plan review ('the unallocated land') which are not, at present, supported by the Council.
- 1.2 IML has previously submitted details of the Site through the Strategic Housing and Employment Land Availability Assessment (SHELAA) call for sites process and throughout the consultation process on the local plan review to date.
- 1.3 In support of the promotion of the preferred allocated site, an updated Vision Document has also been prepared, which has been appended to this submission (**Appendix A**). This document provides further supporting information, including references to high-level technical assessments covering a range of planning issues related to the preferred allocation site. This document shows that the preferred allocation site can deliver sustainable development in this part of the District and would not undermine the purposes of the wider Green Belt in this location.
- 1.4 Set out below is an extract from the Vision Document, showing the concept plan for the preferred allocation site (based on delivering 44 dwellings on the site).

**Figure 1-1 Land at Limepit Lane, Huntington – 'concept plan' for the preferred allocation site**



- 1.5 IML welcomes the identification of the preferred allocation site in the POD as a residential allocation at Huntington., RPS has reviewed the content of the POD and the other documents published by the South Staffordshire District Council ('the Council') and there are matters to which RPS wishes to respond as detailed in these representations.

- 1.6 IML would welcome further discussions with the Council on the emerging proposals for the Site and following consideration of these representations as set out in the rest of this submission.

## 2 RESPONSE TO THE VISION AND OBJECTIVES

2.1 This section provides comments on the draft vision and objectives set out in the POD.

**Question 3:**

**a) Have the correct vision and strategic objectives been identified?**

2.2 RPS has reviewed the draft vision and objectives and does not wish to raise any concerns at this stage. However, the POD does not seek views on the appropriateness of the proposed plan period for the SSLP (currently 2018 to 2038) and RPS has some comments make on this matter.

### Plan Period

2.3 The POD proposes a plan period covering the timeframe 2018 to 2038. This, RPS assumes, would equate the Council's estimate that the SSLP will be adopted during 2023 and would therefore run for the minimum period allowed for in the NPPF (currently 15 years) up to 2038.

2.4 RPS does not agree with the end date of 2038 as proposed. Instead, RPS takes the view that the timescale for the SSLP should be consistent with those plans of its neighbours who are at a similar stage in the process (Regulation 18). The emerging plan review for the Black Country ('Black Country Plan') is currently at the same stage as the SSLP review. However, the end date for the Black Country Plan is currently 2039. This is one year ahead of the SSLP. This means that the SSLP is not only planning for one year's less annual housing growth to meet local needs, but it is also contributing one year's less unmet housing need from the Black Country. RPS would recommend that the plans should be aligned across the same periods

2.5 Whilst a single year is not significant in terms of the difference in timeframes between the two plans, it does make a difference in terms of housing numbers that should be planned for in the SSLP plan period. By extending the plan forward by one year, this would increase the local housing need for South Staffordshire by at least 243 dwellings, but would also increase the potential contribution toward the unmet needs of the Black Country by at least 200 dwellings<sup>1</sup>. This would generate an overall 'minimum' increase of 443 dwellings based on extending the SSLP forward one year from 2038 to 2039.

2.6 There are clear benefits in extending the plan period forward to align with those of neighbouring plans, such as the Black Country Plan. The extension of the plan period to align with its neighbours would go some way towards helping to further reduce the shortfall in housing in the conurbation and would represent an effective planning response on this matter.

2.7 RPS therefore recommends that the plan period for the SSLP is adjusted to align with that of the Black Country Plan to allow for a more integrated approach to addressing unmet need in the wider-HMA.

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<sup>1</sup> On the basis of 4,000 dwellings contribution over a 20-year period, equating to 200 dpa

## Strategic Objectives

- 2.8 The POD identifies a number of Strategic Objectives (SO) that support the delivery of the overall vision. Two strategic objectives relate specifically to the development strategy. Strategic Objective 1 recognises that,
- “...where Green Belt release is necessary, mechanisms are put in place to secure compensatory improvements to the environmental quality and accessibility of the remaining Green Belt.”*
- 2.9 This in line with the paragraph 142 of the Framework and so is broadly welcomed. In this regard, RPS support the draft allocation of land at Limepit Lane.
- 2.10 Strategic Objective 2 guides the development strategy with respect to the preferred locations where future growth should be directed. The objective states:
- “...New development will be focused on sustainable locations within the district, either within or adjacent to the district’s key villages...”*
- 2.11 RPS is broadly supportive of this objective. The preferred allocation site is located on the edge of a named ‘Tier 2’ settlement (Huntington) and so the identification of the preferred allocation site is in alignment with this objective.
- 2.12 Strategic Objective 5 promotes successful and sustainable communities and seeks,
- “To encourage healthy communities through the provision of good access to health and education infrastructure, open space, sport and leisure and children’s play and youth development facilities.”*
- 2.13 RPS is supportive of policy measures that seek to deliver healthy communities by ensuring local people have access to local sport and recreation facilities. IML is willing, through the development of the preferred allocation site, to offer future S106 contributions towards appropriate improvements to the facilities available at the rugby club, which are acknowledged as being under pressure in terms of usage and therefore can benefit from additional investment in those facilities.
- 2.14 Strategic Objective 8 and 9 are broadly similar in nature, both seeking to ensure good access to community facilities and ensuring new development is served by appropriate infrastructure. In this regard, RPS would point out that some settlements, notably Huntington, are located in very close proximity to much larger settlements that are, located outside the District. These larger settlements in the case of Huntington are Cannock/Hednesford, that also provide a wider range of services and facilities that are available and in close proximity to residents of Huntington. Therefore, the level of growth directed to settlements such as Huntington should also take into account the availability of services to local residents in neighbouring areas outside the District that are accessible to residents living in Huntington.
- 2.15 Strategic Objective 11 seeks to protect and enhance the natural environment, including the district’s landscape character and key natural assets such as the Cannock Chase Special Area of

Conservation, whilst ensuring that biodiversity net gain (BNG) is delivered across the district. RPS is supportive of this objective, but would suggest that factors such as landscape, biodiversity and all the other development-related considerations that influence the design of development are better addressed on a comprehensive basis, to the benefit of the development and the wider natural environment. The indicative concept plan for the preferred allocation site (see Figure 1) illustrates how new built and green development can be suitably integrated to support the delivery of this objective. In summary, RPS considers that the preferred allocation site is suitably aligned with the vision and strategic objectives of the POD.



### 3 RESPONSE TO THE GROWTH STRATEGY (POLICY DS3)

**Question 5:**

***Do you support the policy approach in Policy DS3 – The Spatial Strategy to 2038? If no, please explain how this policy should be amended?***

- 3.1 Policy DS3 - The Spatial Strategy to 2038 comprises two broad elements; one which defines the overall level of housing growth to be planned for in the District; and the other element which proposes the settlement hierarchy to which future housing growth is to be directed. This section provides comments on the draft growth strategy, in particular with respect to the proposed housing requirement for the District up to 2038. The next section following this deals with the proposed distribution of housing growth in the District.

#### **Meeting local housing needs**

- 3.2 Policy DS3 identifies a local housing need of 4,131 dwellings (or 243 dwellings per annum) based on the latest standard method calculation set out in the PPG, using a start date of 2021 see Table 7 of the POD). This figure is expressed as a 'minimum' and is derived from the demographic assumptions based on the 2014-based sub-national projections. RPS welcomes the recognition in the POD to deliver a 'minimum' supply of new homes across the District up to 2038, and the preferred allocation site can make an important contribution towards achieving the minimum target.

## 4 RESPONSE TO THE DISTRIBUTION STRATEGY (POLICY DS3)

### Question 5:

*Do you support the policy approach in Policy DS3 – The Spatial Strategy to 2038? If no, please explain how this policy should be amended?*

- 4.1 This section provides comments on the Council's proposed spatial strategy for the distribution of growth over the plan period set out in Policy DS3, with particular attention given the approach being proposed at Huntington.
- 4.2 Having reviewed the overall approach set out in POD, RPS has some comments to raise in relation to the approach at Huntington.

### Strategy for distributing growth at Huntington

#### Summary of approach

- 4.3 RPS is broadly supportive of the overall approach to the distribution strategy set out in the POD, which directs a proportion of housing growth to Huntington.
- 4.4 Under Policy DS3, Huntington is identified as a 'Tier 2 settlement'. In line with its position in the hierarchy, Table 8 of the POD assigns 92 dwellings to Huntington over the plan period, comprising 9 dwellings from existing sites with planning permission, 39 dwellings from previously safeguarded land, and a minimum of 44 dwellings on the new site allocation at Limepit Lane (IM Land's site). This represents 0.9% of the total amount of housing land provided for in the POD. Again, RPS is supportive of the figure being expressed as a 'minimum' as this would allow for higher numbers on those sites identified in the POD, including the preferred allocation site, where the site constraints would support an increase number of units on sites.
- 4.5 Figure 5.1 below, taken from the POD, provides a diagrammatic representation of the proposals (showing the safeguarded site only) for Locality 1, showing how the 0.9% growth allocation will be delivered at Huntington.

**Figure 4-1 Housing Growth – Locality 1 – Huntington**



4.6 As stated above, RPS welcomes the identification of the Limepit Lane site in the POD as part of the housing apportionment assigned to Huntington.

4.7 The Council's reasoning for the apportionment of 0.9% to Huntington is set out in paragraph 4.25 of the POD, which states:

*“Housing growth in the village will be delivered through limited land release alongside the delivery of the safeguarded land identified adjacent to the village. This approach balances the sensitive landscape in the area surrounding the village, including AONB, the extent of Green Belt land in this area and the relative reduced level of services and facilities in Huntington compared to other settlements in the district.”*

4.8 Whilst the commentary above is noted, RPS would recommend that modifications are made to the justification provided by the Council to reflect the potential for higher numbers of dwellings on allocated sites where a design-led approach can demonstrate such increases are suitable and deliverable. This would also align with the ‘minimum’ approach to the delivery of the settlement target and the district-wide housing requirement. To make this effective, the clarification should be included in Policy DS3.

### **Evidence base relating to the Settlement Hierarchy**

4.9 RPS welcomes the identification of Huntington as a Tier 2 settlement. The key piece of evidence base used to inform the proposed settlement hierarchy, and thus the basis for the proposed distribution of housing growth across the District, is the Rural Services and Facilities Audit 2019 (RSFA). Paragraph 1.1 of the audit states,

*“The purpose of this report is to offer evidence on the relative level of services and facilities present in settlements within South Staffordshire. This then allows the study to propose a revised settlement hierarchy...” (RPS emphasis)*

4.10 In assessing the relative sustainability of Huntington, a number of indicators have been applied in the audit (listed at paragraph 3.2 of the report), notably:

- Access to food stores
- Diversity of accessible community facilities/services
- Access to employment locations
- Access to education facilities
- Public transport access to higher order services outside of the village

4.11 RPS notes that the RSFA scores Huntington as ‘amber’ for under the criteria B.1 ‘Diversity of other accessible community facilities/ services’ (see RSFA, Appendix 5).

4.12 The methodology under this criteria (at paragraphs 3.9-3.10 and 3.14 of the RSFA main report) recognises that proximity between settlements is a factor in judging the accessibility of local facilities and services, where services located in one settlement provide access for residents living

in another, as is the case in Codsall/Bilbrook and Chelsyn Hay/Great Wyrely. However, the assessment does not recognise that the close proximity of Huntington to Cannock on Huntington's south eastern boundary. Cannock is the principal urban in the adjacent District of Cannock, where a wide range of services and facilities are located within 1 mile of Huntington, accessible along a safe and walkable route (i.e. A34). Huntington is also located in close proximity to the development at Pye Green Road, also located in Cannock District, where a range of community facilities and services are being provided, also located within 1 mile of Huntington. If these considerations are taken into account, Huntington would score 'green' for 'access to large range of services' under criteria B.1, rather than 'amber' as is currently the case. RPS would therefore recommend the assessment is amended to reflect these conditions.

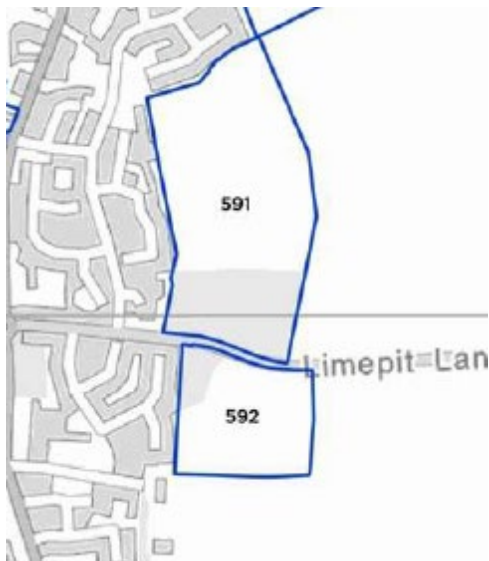
4.13 The RSFA approach therefore only appears to reflect the accessibility of settlements within the District. It does not, however, acknowledge the accessibility of settlements, notably Huntington, to locations outside of the District but which, , are located within easy walking distance. The result is that the RFSA has potentially under-scored Huntington in terms of its accessibility to local services which is, as highlighted above, a key consideration in the lower scale of growth (or 'limited land release') directed to Huntington.

4.14 Accordingly, RPS suggests the findings of the RSFA should be amended in light of the comments raised above.

## 5 RESPONSE TO THE SUSTAINABILITY APPRAISAL

- 5.1 This section provides a response on the sustainability appraisal undertaken on the land under IML's control. The comments are made in response to the *Sustainability Appraisal of the South Staffordshire Local Plan Review Preferred Options Plan Regulation 18 (III) SA Report*, August 2021 ('SAPOP').

**Figure 5-1 Sites in IM Land's control assessed in the SAPOP**



### Response to the SA with respect to the preferred allocation site

- 5.2 Having reviewed the SAPOP, it is apparent that the SA has only appraised the wider site (site 591) within which the preferred allocation site is located. This is shown in Figure 5.1 above.
- 5.3 This approach could, in theory, affect the appraisal and scoring for the preferred allocation site, as the preferred allocation site only forms a relatively small proportion of the wider site that has been appraised.
- 5.4 However, this is not an impediment to the SA process because recent legal rulings have determined that issues with the Environmental Report (including the site appraisal work) can be remedied as part of the next iteration of the SA provided this is consulted on, in line with *Cogent*<sup>2</sup>.
- 5.5 Accordingly, RPS would request that the SA is updated to take into account the selection of the preferred allocation site as part of the SA and provide this for consultation as part of the ongoing work on the local plan review.

<sup>2</sup> Cogent Land LLP v Rochford District Council [2012] EWHC 2542, paras 124-125

## RPS response on significant effects – preferred allocation site

5.6 For clarification, the analysis set out here relates to the ‘post-mitigation’ appraisal for the site.

### SA Objective 4 - Landscape and Townscape

5.7 The Council has determined a ‘major negative’ effect in relation to both Green Belt harm (see paragraph B13.4.2) and landscape sensitivity (see paragraph B.13.4.4). In all other respects under this criteria, the Council judges the effects to be ‘minor negative’.

5.8 In line with the comments above, RPS would point out the need for the evidence base to properly reflect and be consistent with the site boundaries promoted by IML but, critically, should also inform the extent of the preferred allocation site boundary identified by the Council. On this basis, RPS would recommend that the evidence base that informs the SA under this objective should be reconsidered against the preferred allocation site boundary.

5.9 In this context, Tyler Grange (TG) has prepared a technical note responding the Council’s evidence base and sustainability appraisal on landscape and Green Belt matters as they relate to the preferred allocation site (and the wider parcel under IML’s control at Limepit Lane). The findings are set out in detail in the note, which is appended in full to this submission (**Appendix B**).

5.10 In relation to landscape sensitivity, the note focuses on the two elements that have been assessed as making the landscape of ‘moderate-high’ sensitivity to development, resulting in a score of ‘major negative’ impact under this objective. These elements are the *role in settlement setting* and the *intervisibility with adjacent designated landscapes or promoted viewpoints*. The analysis addresses these elements and is provided at paragraph 3.12-3.20 of the note. In conclusion, on setting, TG finds that the preferred allocation site is of ‘**moderate**’ sensitivity to development because it provides some contribution as a backdrop to the adjacent settlement, but would not represent a step-change in settlement form. In addition, on intervisibility, TG also finds that the preferred allocation site is of ‘**moderate**’ sensitivity because analysis shows that the preferred allocation site only has some intervisibility with surrounding sensitive landscapes or viewpoints. As a result, RPS suggest the sensitivity of the preferred allocation site to development should be reduced to ‘**medium**’.

5.11 In relation to Green Belt, TG notes that the Council Green Belt Study (2019) uses land parcels significantly larger than the preferred allocation site and include all of land between Huntington and Hednesford, including the rising and more visually prominent higher ground to the east. TG has undertaken a site specific assessment of contribution of the preferred allocation site makes to the purposes of the Green Belt and its likely resulting harm on the remaining Green Belt overall. Given the preferred allocation site (and the wider land under IML’s control at Limepit Lane) is currently designated within Green Belt, the analysis provided by TG is set out under a separate section on Green Belt policy (section 7). In summary, the analysis finds that the preferred allocation site is only likely to cause **moderate** harm to the Green Belt because it will not cause a notable weakening in the existing Green Belt boundary.

5.12 Based on the above, RPS contends that the appraisal of the preferred allocation site should be amended to 'minor negative' under this objective.

**SA Objective 6 - Natural Resources**

5.13 The Council has determined a 'minor negative' effect in relation to this SA objective. This is applied to the wider site (site 591) being deemed 'previously undeveloped' and that development of the site would result in an '*... inefficient use of land and the permanent and irreversible loss of ecologically valuable soils...*' (see paragraph B.13.6.1 of the SAPOP). In addition, the Council claims that the site is part of Grade 3 ALC, and so development would lead to the loss of this '*... agriculturally important natural resource...*' (see paragraph B.13.6.2).

5.14 In line with comments above, RPS would like noting that the preferred allocation site is not in agricultural use. Similarly, whilst there may be some existing features that warrant retention, the preferred allocation site is not designated for its biodiversity value.

5.15 In light of the above, RPS contends that the preferred allocation site should not be scored 'minor negative' under this objective without sufficient evidence to support the Council's claim. RPS notes that the SA methodology only allows for score or 'negative' or 'positive', but does not allow for 'neutral' or 'uncertain' scores under this objective. Further to the concerns with the SA methodology as highlighted above, RPS suggests that the site scoring should be considered further.

**SA Objective 8 – Health and Well-Being**

5.16 The Council has determined a 'minor negative' effect in relation to this SA objective. This is because of the following:

- Air Quality Management Area – both sites are located over 200 metres from a designated AQMA or main road – 'minor positive' (see B.13.8.4)
- Access to Health Facilities – both sites are located outside the target distance (5km) from the nearest hospital (County Hospital, Stafford); wholly or partially outside the target distance to the GP surgery (Chadsmoor GPS) – 'minor negative' (see B.13.8.2);
- Access to leisure facilities – both sites are located over 1.5 km from the nearest leisure centre (Penkridge) – 'minor negative' (B.13.8.3)
- Access to green network (PROW/cycle network) – both sites is located within 600m of the PROW network and public greenspace – 'minor positive'

5.17 In relation to access to health facilities, RPS notes that the SA methodology (at paragraph 3.8.4) only includes reference to five NHS Hospitals, all of which are located outside the District. This is because these hospitals have an Accident & Emergency (A&E) service, whilst there are none in South Staffordshire. The SAPOP states that,

*"Distances of proposals to other NHS facilities (e.g. community hospitals and treatment centres) or private hospitals has not been taken into consideration in this assessment."*

- 5.18 No explanation has been given as to why it is appropriate to exclude certain NHS services simply on the grounds they do not provide an A&E. Without a clear explanation, the decision to exclude other 'non-A&E' NHS hospitals is somewhat arbitrary. Furthermore, it seems unreasonable to devise a methodology that specifically excludes certain services from appraisal when clearly such services exist and are available to local people.
- 5.19 This is important because certain health services are located in close proximity to Huntington, but also located outside the District (notably Cannock Chase Hospital). Cannock Chase Hospital is part of the Royal Wolverhampton NHS Trust, alongside New Cross Hospital which is one of the five hospitals included in the SAPOP. The hospital provides a wide range of health services, including General Surgery, Orthopaedics, Breast Surgery, Urology, Dermatology/Plastic Surgery and Medical Day Case Investigations and Treatment (including Endoscopy, Rheumatology and Dermatology)<sup>3</sup>. The hospital is located within 1 mile of Huntington's settlement boundary, well within the target distance used in the SAPOP. This should, on a reasonable basis, be recognised as part of the SA process for appraising specific site options.
- 5.20 RPS therefore considers that the SAPOP should be based on a more proportionate measure of access to local health facilities that more reasonably reflects the situation as it exists on the ground.
- 5.21 Therefore, when applying a reasonable approach with respect to accessibility to local health services, RPS contends that, in overall terms, the preferred allocation site should be 'minor positive'.

### ***SA Objective 10 – Transport and Accessibility***

- 5.22 The Council has determined a 'minor negative' effect in relation to this SA objective. This is for the following reasons, notably:
- Bus stops – both sites partially or wholly located within the target distance of 400m – 'minor positive'.
  - Pedestrian access – both sites are well connected to the existing footpath network – 'minor positive'.
  - Road access – both sites are well connected to the existing road network – 'minor negative'.
  - Railways stations – both sites are partially or wholly located outside the target distance of 2km – 'minor negative'.
  - Local Services (convenience stores) – both sites are located within the target distance of 2km – 'minor positive'.

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<sup>3</sup> <https://www.royalwolverhampton.nhs.uk/services/>



- 5.23 RPS disputes the assertion that the sites would have ‘minor negative’ effects under this objective. The summary above shows that only with respect to ‘railway stations’ do the sites score negatively. In all other respects, under this objective, both sites score ‘minor positive’. It should also be noted that Hednesford Railway Station is 2.5km from both sites, and are the closest to the station of any of the site options at Huntington. Whilst outside the target distance (2km), both sites are still within reasonable distance of a rail station, in the context of a rural district such as South Staffordshire.
- 5.24 It is also noted that the SA methodology does not assign any ‘weighting’ where sites score positively and negatively against the various sub-criteria under the same objective. Without any weighting system, it is left to open to judgement as to where the score should fall in these circumstances. This SA objective is broken down into five sub-criteria, as shown above the scores are not the same across each sub-criteria. In applying a reasonable judgement as to where the score should ultimately fall, and when taking into account the scores for all five sub-criteria, it would be fair to suggest that the preferred allocation site would, on balance, have a ‘minor positive’ effect under this objective.
- 5.25 Consequently, the score should be amended to ‘minor positive’ under this SA objective.
- SA Objective 11 - Education**
- 5.26 The Council has determined a ‘minor negative’ effect in relation to this SA objective. This is for the following reasons, notably:
- Secondary schools – both sites are located outside the target distance (1.5km) to the nearest secondary school.
- 5.27 The 1.5km threshold applied under this objective equates to a distance of less than one mile (0.9 miles). However, both national<sup>4</sup> and local<sup>5</sup> guidance applies a wider distance threshold in measuring appropriate distances between home and school locations. These are based on the use of 3 mile (or 4.8km) distance for pupils aged 8 and above, which includes pupils who attend secondary school. The nearest secondary school to the preferred allocation site is Cardinal Griffin Catholic High School, which located around 2.25 km south, accessible from Huntington along the A34 into Cannock town. This falls well within the local and national distance thresholds highlighted above.
- 5.28 When applying official distance thresholds to measure access to schools, the preferred allocation site would score ‘minor positive’.
- 5.29 On this basis, RPS recommends that the score for both sites should be amended to ‘minor positive’ against this SA objective.

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<sup>4</sup> Department of Education, *Home to school travel and transport guidance Statutory guidance for local authorities* July 2014

<sup>5</sup> Staffordshire County Council *Home to School/College Travel Policy and Guidance* Updated June 2021

**SA Objective 12 – Economy**

5.30 The Council has determined a ‘minor negative’ effect in relation to this SA objective. This is for the following reasons, notably:

- both sites are located in an area with ‘unreasonable’ sustainable access to employment opportunities (see paragraph B.13.12.1 of the SAPOP)

5.31 RPS would point out that the Rural Services and Facilities Audit (RFSA, Appendix 3) identifies two employment centres at Huntington. One of these is Huntington Industrial Estate, located off Cocksparrow Road on the north western edge of the settlement. This estate contributes to the Council’s employment land supply and is protected for such uses subject to Policy EV1 of the development plan. The estate therefore provides local employment opportunities for local people, and is located less than 400m from both site 591 and 592. It is clear that, in line with the Council’s own SA methodology, that providing homes on both these sites would place site end users in locations with good or reasonable access to employment opportunities. The presence of local employment in Huntington should be reflected on the appraisal of the preferred allocation site.

5.32 Nonetheless, in RPS’ view, as defined in the SA methodology, a more reasonable score would be ‘minor positive’.

**Summary of RPS appraisal – adjusted scores for site 591 and 592**

5.33 Based on the foregoing analysis, RPS sets out alternative findings with respect to the preferred allocation site. This is set out in the table below.

**Figure 5-2 RPS Sustainability Appraisal – relating to preferred allocation site**

	1	2	3	4	5	6	7	8	9	10	11	12
Post-mitigation	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
Huntington												
Preferred Allocation Site	+/-	+	+/-	-	0	+/-	+	+	0	+	+	+

5.34 In conclusion, the appraisal undertaken by RPS shows that the preferred allocation site performs particularly well in terms of economic and social-related objectives, but also is broadly neutral and / or positive against the range of environmental-related objectives as well.

5.35 The analysis set out here demonstrates that the preferred allocation site would deliver good sustainability outcomes were they to be brought forward for residential development.

## 6 RESPONSE ON SITE ASSESSMENT AND SELECTION

***Question 1: Do you agree that the evidence base set out in Appendix A is appropriate to inform the new Local Plan?***

6.1 In broad terms, yes.

6.2 Draft Policy SA5 lists the housing allocations identified to meet the district's housing target up to 2038. As mentioned previously, RPS welcomes the identification of the preferred allocation site in the POD, under the description 'Land at Oakland Farm, north of Limepit Lane'. Paragraph 5.7 of the Preferred Options Document (POD) explains that the methodology for filtering site options and the assessments of allocated sites and reasonable alternatives can be found in the accompanying Housing Site Assessment Topic Paper. This is actually entitled the 'Housing Site Selection Topic Paper' (HSSTP)

6.3 RPS provides a brief response to the points raised by the Council below.

### **RPS response with respect to the preferred allocation site**

6.4 Paragraph 5.7 of the Preferred Options Document (POD) explains that the methodology for filtering site options and the assessments of allocated sites and reasonable alternatives can be found in the accompanying Housing Site Assessment Topic Paper. This is actually entitled the 'Housing Site Selection Topic Paper' (HSSTP). The commentary relevant to the preferred allocation site is provided at Appendix 3 of the HSSTP. RPS notes that the Council's consideration of the preferred allocation site is covered by the assessment applied to site 591.

6.5 Having reviewed the HSSTP and the supporting information used to inform it, RPS would like to make the following points.

6.6 RPS welcomes the recognition in the HSSTP that there is insufficient non-Green Belt opportunities to delivery growth at Huntington and that additional growth is required above the existing safeguarded land and allocations in the settlement. This is clearly evident given the relatively tightly drawn boundary currently identified. The preferred allocation site offers a suitably located opportunity to address this issue.

6.7 RPS supports the Council's findings with respect to 'no concerns' raised in relation to impact on the historic environment.

6.8 In relation to Green Belt and Landscape matters, RPS has raised concerns with these findings in terms of how they have been applied to the sustainability appraisal with respect to the preferred allocation site (set out in section 4 of this submission). In summary, if the assessments are applied to the preferred allocation site then the potential impacts likely to be lower than suggested by the Council.

6.9 In relation to 'Known site constraints', RPS would like to point out that none of these preclude residential development on the preferred allocation site.

- 6.10 With respect to highways issues, the vision document highlights that there are no known highway capacity constraints that would prevent the proposed development coming forward on the preferred allocation site. In response to the point raised by the CHA on visibility splays (see Appendix 2 of the HSSTP for the CHA's response), RPS would reassure the Council and CHA that any layout and visibility splays will meet the requirements of the local highway authority, informed by recorded vehicle speeds (c.40mph).
- 6.11 In summary, based on the foregoing analysis, RPS would suggest that there are no issues that preclude the Council from identifying preferred allocation site for allocation in the new local plan.

### **Other relevant evidence**

- 6.12 RPS would like to highlight other aspects of the evidence base that are of relevance to consideration of the preferred allocation site, notably the Council's latest Strategic Housing and Employment Land Availability Assessment (SHELAA) 2021. The SHELAA is a study of potential housing and employment sites in the district, and is a technical background document which forms a key part of the evidence base for the Local Plan in identifying land which is suitable, available and achievable for housing development over the plan period.
- 6.13 The SHELAA provides a brief assessment of land covering the preferred allocation site (see Appendix 6 of the SHELAA), which is broadly supportive. In summary, the SHELAA assesses both sites as being '*...Potentially suitable but subject to policy constraints - Green Belt...*'. The only constraint of any significance is the current Green Belt boundary that the preferred allocation site. Furthermore, the SHELAA does not identify any other, specific constraints beyond the policy constraint that would prevent development coming forward on the preferred allocation site.
- 6.14 On the basis of the information set out in the SHELAA, and subject to the release of the preferred allocation site from the Green Belt, the Council accepts that the site has potential to deliver additional homes at Huntington.

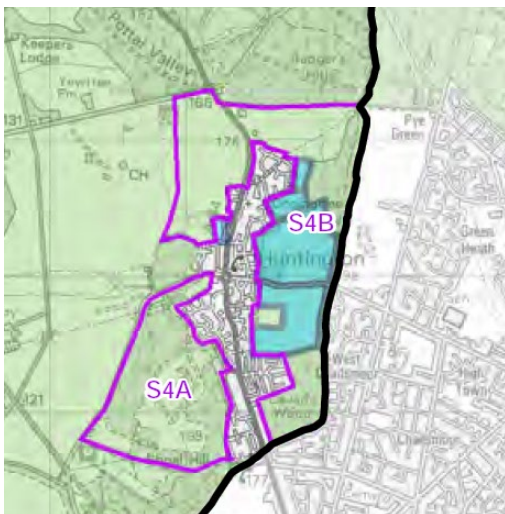
## 7 RESPONSE TO THE GREEN BELT (POLICY DS1)

**Question 4: Do you support the policy approach in Policy DS1 – Green Belt and Policy DS2 – Open Countryside?**

### Approach to Exceptional Circumstances

- 7.1 Policy DS1 (Green Belt) proposes a number of boundary changes to the adopted Green Belt in the District to accommodate development allocations set out in Policies SA1, SA2, SA3, SA5, and SA7.
- 7.2 As part of the development strategy, paragraph 4.3 recognises that the release of Green Belt land is justified due to the limited potential to allocate land on brownfield sites and land located outside the Green Belt. In this context, in order to meet the future development needs of the District, Green Belt release is inevitable. RPS therefore agrees with the Council that the lack of other viable options to meeting the growth needs of the District, as well as helping neighbouring authorities in the Black Country to addressing their unmet housing need, are exceptional circumstances that justify the approach being taken in Green Belt as set out in Policy DS1.
- 7.3 In this context, RPS suggests that the release of Green Belt comprising the preferred allocation site is justified and appropriate.

**Figure 7-1 South Staffordshire Green Belt Study 2019 – extract showing Parcel S4B (shown pink outline)**



Taken from GBS 2019, Figure 7a

### Comments on Council's assessment with respect to the preferred allocation site

- 7.4 The Council continues to rely on the Green Belt Study (GBS) 2019, prepared by LUC. The evidence is split into two parts; stage 1 and stage 2. In stage 1 of the GBS, the preferred allocation site forms part of 'Parcel S4' which is a large tract of land to the west of Cannock town that stretches into the South Staffordshire countryside and wraps around Huntington settlement, comprising 1,110.4 hectares. Parcels assessed in the study vary greatly in size, with several under 4 hectares in size i.e. smaller than the Site. In this scenario, given the size disparity between parcel S4 and the

preferred allocation site, the assessment of Parcel S4 against the Green Belt Purposes has limited value for these sites in terms of its contribution to the Green Belt.

- 7.5 Stage 2 of the GBS therefore sub-divides parcel S4 into smaller units and the sites are located within 'Parcel S4B' (see Figure 7.1 above).
- 7.6 The GBS assigns a 'high' harm rating were land to be released for development from this sub-parcel. RPS makes draws some observations from this finding.
- 7.7 The first point of note here is that whilst smaller in size, the assessment parcel still comprises an area covering 180.3 hectares. In contrast, the preferred allocation site measures c. 2.0 hectares (based on measurements set out in the vision document). This area is significantly smaller than parcel S4B, some 90 times smaller to be precise. The preferred allocation site is therefore only a very small fraction of the overall parcel.
- 7.8 And secondly, the preferred site allocation does not extend eastwards beyond the existing extent of the built edge and is contained on the lower-lying slopes. The site therefore makes a lower contribution to the Green Belt than the larger parcels considered and therefore its loss would not be as harmful as suggested in the Stage 2 GBS.

**Site-Specific Assessment – preferred allocation site**

- 7.9 In this context, Tyler Grange has undertaken a site specific assessment of contribution of the Site to the purposes of the Green Belt and its likely resulting harm on the remaining Green Belt overall. Contribution to the recycling of brownfield land is considered to be the same for all greenfield sites and, therefore, this has been scoped out. The findings of the assessment are set out in paragraphs 3.28-3.37 of the technical note (Appendix B). In summary, the preferred allocation site scores the following under each purpose and in terms of overall harm:

**Table 7-1 Summary score on Green Belt purposes – preferred allocation site – TG note**

Green Belt Purpose	Contribution	Harm
1. To check the unrestricted sprawl of large built up areas	moderate to low	moderate
2. To prevent neighbouring towns merging into one another	weak/no contribution	
3. To assist in safeguarding the countryside from encroachment	moderate to low	
4. To preserve the setting and special character of historic towns	weak/no contribution	

- 7.10 In light of the findings of the site-specific assessment provided by TG, these issues should be considered as part of an update to the GBS findings so they account for the preferred allocation site boundary.

## Green Belt Compensation

- 7.11 As set out at paragraph 143 of the Framework, when defining Green Belt boundaries development plans should '*define boundaries clearly using physical features that are readily recognisable and likely to be permanent*'. Furthermore, paragraph 142 of the Framework states that plans should, '*...set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.*'
- 7.12 The July 2019 update to the Planning Practice Guidance (PPG) reinforces policy in the Framework, recognising the visual aspects of openness of the Green Belt, as well as reinforcing the need to offset the harm arising from the release of Green Belt land through enhanced access to and recreational, landscape and biodiversity value of land retained within the Green Belt.
- 7.13 In this regard, the preferred allocation site lies adjacent to the existing built edge of Huntington and has the capacity to accommodate development that is sensitively designed and located on the lower slopes.
- 7.14 Development would also preserve the openness of the larger fields on the rising land to the east, their role in providing separation between settlements and as open, undeveloped and accessible countryside in the Green Belt (see Indicative Concept Plan in **Appendix A** of this submission).
- 7.15 There are also opportunities for development to incorporate new boundary planting to provide an improved soft edge to the settlement that is characteristic of the local landscape, and preserved by the landscape and visual setting of the AONB, including views from the higher ground to the west looking across the preferred allocation site, and which creates a more strongly defined Green Belt boundary than is currently the case.
- 7.16 All these development features offer clear opportunity to offset the loss of Green Belt in this location, in line with national policy.



## 8 LAND AT LIMEPIT LANE, HUNTINGTON (PREFERRED ALLOCATION SITE)

### *Question 8: Do you support the proposed housing allocations in Policy SA5?*

- 8.1 Yes, RPS supports the proposal to allocate the preferred allocation site in the POD as 'Land at Oaklands Farm (north of Limepit Lane)' for housing under Policy SA5. This will help to meet the housing growth needs of South Staffordshire up to 2038.
- 8.2 Nonetheless, as discussed elsewhere in this submission, the scale of the shortfall in housing across parts of the HMA, notably from the Black Country, and relative under-provision of housing growth at Huntington compared to other Tier 2 settlements, shows there is clear justification to increase the level of housing provided for at the settlement.
- 8.3 RPS suggests this can best be achieved in two ways; increasing the quantum of growth on the preferred allocation site, or potentially increasing the site boundary beyond the current allocation boundary drawn for the Limepit Lane site, in order to accommodate additional growth.
- 8.4 The second approach outlined above forms the basis of separate representations submitted on behalf of IM Land in relation to land omitted from the POD.
- 8.5 RPS notes the Council has allocated the Limepit Lane preferred site allocation for 44 dwellings in the POD. This has been calculated based on a 70% net developable area across a 2.0 hectare site, equating to 1.4 hectares net. The Council then assumes that the allocation would be built out at 32 dwellings per hectare, generating a site capacity of 44 dwellings. RPS further notes that the Council's estimated capacity for the site is a 'minimum' figure. RPS support this which shows that, where demonstrated, additional dwellings could be supported on the allocation.

### **Updated Vision for the preferred allocation site**

- 8.6 As shown in Appendix A, an updated vision document has been prepared in light of the Council's preferred approach at Huntington. The document highlights a number of design principles that support development on the preferred allocation site. These are:
- The proposal provides for a minimum of 44 dwellings using an average density of 38 dwellings per hectare (dph).
  - Vehicle access to the site will be provided via an enhancement of the existing dropped kerb access from Limepit Lane.
  - The development has a soft green transitional edge to the east.
  - The retention and enhancement of existing green capital wherever possible, to shape a connected and multi-functional green infrastructure network – including recreation, ecological habitats and attenuation.
  - New public open space which is well fronted onto by development and well overlooked incorporating green and blue infrastructure including SuDS.



### Potential options for the preferred allocation site

8.7 As part of the options work carried out on behalf of IML, an alternative ('Option 1') has also been devised showing an illustrative layout for 54 dwellings that could be delivered within the Council's preferred allocation site boundary.

8.8 A plan showing the layout is set out in the updated Vision Document (in section 6), with an extract shown below.

**Figure 8-1 Alternative layout within the preferred site allocation boundary – north of Limepit Lane ('Option 1')**



8.9 This shows that a slightly higher capacity development can be achieved, including provision of sustainable urban drainage, public open space and Green Belt compensation on site, without detrimental impact on the site or the surrounding area.

8.10 The indicative concept plan, and the alternative option also provided (shown in section 6 of the Vision Document) clearly show that a suitable development can be delivered on the allocated site, and can address and integrate site-specific requirements into the layout, i.e. public open space and sustainable drainage measures, in line with current and emerging policies of the development plan.

## 9 CONCLUSIONS

- 9.1 These representations have been prepared on behalf of IM Land, with respect to their interests in the 'Land at Limepit Lane, Huntington' (the Site'). The submission provides a response to the decision to identify part of the land in IM Land's control for residential allocation in the new local plan.
- 9.2 RPS welcomes the proposed allocation of land under the control of IM land at Huntington, namely 'Land at Oaklands Farm north of Limepit Lane' ('preferred allocation site').
- 9.3 The submission made here are reflective of the proposed inclusion of the preferred allocation site, and are summarised as follows:
- RPS supports the Council's recognition that the release of Green Belt land is justified due to the limited availability of suitably located non-Green Belt land. This is particularly evident at Huntington.
  - RPS therefore welcomes the identification of the preferred allocation site for 44 dwellings and considers this to be wholly appropriate and justified. This will assist the Council in delivering much-needed housing in the District over the plan period, as well as supporting the delivery of the Council's vision and strategic objectives of the new Local Plan. As shown in the updated vision document (Appendix A), this is considered to be achievable on the preferred allocation site.
  - RPS supports the expression of the housing requirement and the site capacity figure for the preferred allocation site as a 'minimum' requirement. Nonetheless, RPS suggests that additional wording could be added to the site allocation policy (SA5) to make clear that more development within the site allocation boundaries would be supported where justified through a design-led approach to development.
  - In this context, an alternative layout is included in this submission (Option 1) which shows that a slightly higher capacity of homes, for 54 dwellings, can be achieved on the allocation site (subject to limited adjustments to the boundary to include new public open space). This is also shown in the updated Vision Document for the preferred allocation site.
  - RPS is also broadly supportive of the evidence base and the sustainability appraisal findings with respect to the preferred allocation site. This shows that, in overall terms, the evidence supports the preferred allocation site as being appropriate for selection and allocation for residential development in the POD.
  - Nonetheless, RPS has identified some issues with the supporting information used by the Council and these are highlighted in the main body of this submission. Notably, some aspects of the evidence base seem to over-estimate the potential impact of development on the preferred allocation site because significantly larger land parcels have been used as the basis for those assessments. This is particularly with respect to matters relating to

landscape sensitivity and Green Belt harm. In this regard, site-specific assessment on these matters has been undertaken on behalf of IML and these are appended to this submission (Appendix B). RPS would recommend that the evidence base is reconsidered to reflect on the smaller land area comprising the preferred allocation site.

- 9.4 IM land would welcome further engagement with the Council as the plan review moves forward, in light of the representations set out here.

## Appendix A Vision Document: Land at Limepit Lane, Huntington, December 2021

# Appendix B Technical Note and Analysis of Landscape and Green Belt Evidence, December 2021 (Tyler Grange)