



Strategic Planning Team / Local Plans
South Staffordshire Council
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South Staffordshire
WV8 1PX

Joe Nugent MRTPI
Planning Executive
Brownshore Management
M54 Space Centre
Halesfield 8, Telford
TF7 4QN

13 December 2021

Dear Sir / Madam,

RE: SOUTH STAFFORDSHIRE COUNCIL - LOCAL PLAN REVIEW - PREFERRED OPTIONS (1 NOVEMBER TO 13 DECEMBER 2021)

SUBMISSION OF WRITTEN REPRESENTATION RELATING TO ESSINGTON QUARRY (FORMERLY WINDMILL QUARRY), BOGNOP ROAD, ESSINGTON WV11 2AZ

INTRODUCTION

I write with regard to the South Staffordshire Council - Preferred Options (1 November to 13 December 2021).

Brownshore Management represents the landowner (Evall Management Ltd) as their Planning Agent and as part of the Local Plan Review submit the following written representation to form part of the review, assessment, and allocations for the emerging South Staffordshire Local Plan (2018-2038).

WRITTEN REPRESENTATION

Brownshore Management makes formal representation regarding Essington Quarry, Bognop Road, Essington WV11 2AZ. The site has been submitted through the Local Plan process and represents a key contributor to the spatial and logistical distribution of employment land for the emerging Local Plan.

The site is located adjacent to the Hilton Main Industrial Estate and Vernon Park, the site is in proximity to the Hilton Cross Business Park. These industrial and commercial estates form established employment sites at Junction 1 of the M54 and in proximity to Wolverhampton. These sites have direct access to the strategic road network (M54) and also into Wolverhampton via the A460. Furthermore, these sites are in proximity to the strategic employment sites (including Jaguar Land Rover) located at Junction 2 of the M54.



The allocation of the Essington Quarry site for employment land within the emerging Local Plan directly contributes to the established industrial and commercial estates of Hilton Main and Vernon park.

Within the Draft Local Plan Preferred Options November 2021, Table 9: South Staffordshire Employment Stock identifies the proposed and established employment sites. Hilton Main and Vernon Park are included and cumulatively these only have 2.8ha remaining (from a total of 12.77ha) for the forthcoming plan period. Furthermore, the nearby Hilton Cross Business Park only has 4.84ha (from a total of 18ha).

Therefore, at the established employment land location at Junction 2 of the M54 limited land remains East of the A460 with no land available on Hilton Main Industrial Estate and only 2.8ha remaining available at Vernon Park. There is also limited future land available at Hilton Cross Business Park (4.84ha). It is therefore reasonable to establish a shortfall of employment land will readily occur at these three sites (adjacent to Junction 2 of the M54) and result in loss of future employment land at an established and sustainable location.

The (whole or part) allocation of the Essington Quarry will form a natural extension to two well-established industrial and commercial estates. The allocated land area would provide sustainable and accessible employment land at an established location, vehicular access can be directly afforded from Hilton Main Industrial Estate and Vernon Park, or alternatively directly from the existing commercial access at Bognop Road.

Objection - Omission of question within the Local Plan Review

The Local Plan Review includes Q.9 relating to Policy SA6: Gypsy and Traveller Allocations, then proceeds to Q.10 relating to Policy SA7 - Employment Allocation – West Midlands Interchange.

There is an omission of any question relating to the employment land allocations in Table 9 and this entirely removes the ability for responses to be provided supporting or objecting to the proposed employment land allocations. This omission is considered to render this part of the consultation process unsound as consultation responses cannot readily be submitted as per other sections of the consultation process.

This matter is considered a material consideration and in this instance an objection is submitted as the omission of a question at this section of the Local Plan is necessary to allow the consultation process to be sound.



ESSINGTON QUARRY

Essington Quarry has been identified as being operational, unrestored and remains extant in planning terms (Ref: SS.404/74). The site therefore falls within the classification of brownfield land (Previously Developed Land; PDL).

The site retains significant mineral reserves and these are identified to be extracted within the immediate future, therefore releasing the site for restoration to employment use at an established and therefore sustainable location for employment land.

GREEN BELT

The site is currently located within the Green Belt. Para.149 (g) of the NPPF (2021) supports the redevelopment of brownfield land where the development would not have a greater impact on the openness of the Green Belt than the existing development (in this instance mineral operations).

Para 138 of the NPPF (2021) states Green Belt serves five purposes:

- a. to check the unrestricted sprawl of large built-up areas;*
- b. to prevent neighbouring towns merging into one another;*
- c. to assist in safeguarding the countryside from encroachment;*
- d. to preserve the setting and special character of historic towns; and*
- e. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*

The allocation and development of the site for employment purposes does not conflict with the five purposes of the Green Belt as provided by the NPPF (2021).

The established sites at Junction 1 of the M54 are separated from the broader urban area and do not form a large built up area, unrestricted sprawl would therefore not occur.

CONCLUSION

The inclusion of (part or whole) of the Essington Quarry site as employment land directly contributes to the well-established employment land at this location. The site is therefore requested to be reconsidered and assessed for its contribution to the employment land portfolio for the emerging Local Plan.

Kind regards,

Joe Nugent