

The Elms
Oakwood Park Business Centre
Bishop Thornton
Harrogate
HG3 3BF
Tel: 01423 206602

simon.chadwick@carneysweeney.co.uk

Local Plans
South Staffordshire Council
Wolverhampton Road
Codsall
South Staffordshire WV8 1PX

13 December 2021

localplans@sstaffs.gov.uk

Dear Sir/Madam

REPRESENTATIONS ON BEHALF OF PEVERIL SECURITIES LIMITED TO SOUTH STAFFORDSHIRE LOCAL PLAN REVIEW PREFERRED OPTIONS SEPTEMBER 2021

We have been instructed by Peveril Securities Limited who wish to make representations to the consultation draft of the South Staffordshire Local Plan Review. Peveril controls various parcels of land broadly lying north and south of the M54 corridor between junctions 1 and 2 and has comments in relation to the following matters:

1. Development strategy in relation to the scale and provision of housing.
2. Certain site specific matters relevant to proposed housing allocations and a suggested additional allocation which Peveril propose.
3. Development strategy related to scale, provision and quality of employment allocations.
4. Specific proposals to allocate an extension to the established strategic employment site at Hilton Cross.

The representations below can be considered as a response to various of the questions raised within the Local Plan Review document. The specific questions covered are question 1 – Peveril doubts that ultimately the evidence base on the calculation of housing requirements will be the most up to date; question 3 – Peveril agrees with the objectives that consider that the delivery of objectives 3 and 7 requires further allocation of housing/reserve sites and the specific allocation of an extension to the Hilton Cross site; question 5 – Peveril does not support various aspects of Policy DS3 and doubts the ability of the strategy to deliver appropriate amounts of housing so that further allocations or reserve housing sites are required; question 8 – Peveril supports the Cross Green housing allocation but suggests a further allocation of land adjacent to Featherstone (see below) and question 10 – Peveril supports the continued allocation of ROF Featherstone but proposes the allocation of an extension to the Hilton Cross strategic employment site.

Attached to these representations are three plans which relate to specific sites which Peveril is making specific comments on relating to both housing and employment.

1. Development strategy relating to overall scale and provision of housing

Peveril note that the calculation of the housing land requirements to be used by the Council in the Local Plan Review for the period 2018 to 2038 are a combination of firstly the requirements generated from OAN within South Staffordshire and secondly an allowance for the overspill from the Black Country that would be provided within South Staffordshire within the Local Plan Review period. Whilst Peveril does not criticise the Council specifically for the calculations it has made of both elements, it is clear that in



the context of the overall review of housing land requirements across the country by the current Secretary of State the ultimate figures which will be considered at the Examination into the Plan could well be changed. It is difficult to predict the extent of that change; however, Peveril's overall view is that housing OAN requirements (using the 'standard methodology') that have historically been required to be met in the south and south-east of England may well be reduced and higher requirements generated to be met in the Midlands and northern areas as part of the Government's 'levelling up' agenda. Whilst this may have implications for the calculation of the Black Country requirements as a whole (and therefore overspill into South Staffordshire) it is also the case that the Council – arising from its historic employment land policies and the policy of the Local Plan Review to allocate the West Midlands Interchange site – has a number of strategically significant employment sites located within the M54 corridor. This includes the Core Strategy strategic sites at Royal Ordnance Factory; I54; Hilton Cross etc which are now proposed to be added to by the West Midlands Interchange (WMI) allocation.

The combination of these existing and proposed sites will result in a concentration of a large number of new jobs within the M54 corridor. Therefore, the development strategy for scale and provision of housing needs to be at a quantum and location to promote sustainable development, ie provide housing near where people would wish to work. These locational/sustainability aspects need to be reviewed as part of the development strategy as a whole in addition to whether the quantum of housing provided within the Plan period in any event meets the appropriate requirements emanating from the recalculation of household formation rates etc and the distribution of that housing nationally.

In the light of these factors, at the very least Peveril considers that the Council should continue its policy of safeguarding land (from the existing Sites and Allocations Document) to provide for more housing convenient to the M54 corridor in the southern part of the borough close to the strategic employment sites. This may mean a targeted review of certain Green Belt boundaries with the proviso that any safeguarded land identified would not need to be developed unless housing needs arose.

The Council's summary of its housing land provision in table 7 of the Local Plan Review concludes it should provide some 8,881 dwellings (taking account of completions since 2018) to meet its interpretation of the OAN requirements and Black Country overspill. The summary of the provision from various sources – ie existing planning permission, safeguarded land and allocations – is set out in table 8. The total forecast provision – including new allocations – is some 9,584 dwellings are anticipated to be delivered within the Plan period to 2038. That provision represents only some 8% above the Local Plan Review's proposed requirement of 8,881 dwellings. In Peveril's view this does not represent sufficient flexibility to ensure that what the Council describe themselves as the 'minimum' figure of 8,881 dwellings is actually delivered within the Plan period. Typically, it is assumed that some 10% of all permissions and allocations may 'fall out' during the Plan period due to various reasons. Without going into the detail of each large allocated site and the constraints on each one, Peveril has concluded the Council should allocate – even on its own assumptions – a further four to five hundred dwellings to provide a suitable reserve of deliverable land to ensure the minimum requirements are met and to allow for either delays or problems on proposed allocations. This supports the contention that new land should either be allocated for housing or safeguarded for housing development (eg removed from the Green Belt) to ensure that over the Plan period the minimum requirements generated by the Council's calculations are met. Peveril's view in any event is that the overall provision of housing proposed would not constitute the 'significant boost' to housing supply which is required in the NPPF.

2. Site specific allocations and comments (housing)

In the context of Peveril's concerns about housing quantum and scale of provision, Peveril recognises the benefits of a strategy of allocating a number of larger sites to generate significant housing numbers to contribute towards the relevant requirement. Such allocations should, given Peveril's comments about the location of strategic employment sites, be located within easy access to the M54 corridor. Peveril supports in principle the allocation of the 'Cross Green' site and considers it could deliver sustainability benefits in relation to the provision of a new park way railway station as well as being conveniently located to strategic employment sites such as I54 and the Royal Ordnance Factory (see below).

Peveril controls land which is intended to be within the Cross Green allocation and wish to confirm that this land (see plan 10A – 5.6 hectares) will be brought forward as part of the Cross Green allocation



within the Plan period. Peveril therefore confirms support for that element of Policy DS3 that identifies Cross Green and the Site Allocation Policy SA2.

Peveril though would also, as outlined above, wish to see the Council consider either the allocation of further housing sites or the safeguarding of such sites for future housing should problems arise with the delivery of housing supply to meet requirements in the Plan period. Given the disposition of significant strategic employment sites around the M54 and the status of the settlement of Featherstone, there is logic in reviewing the capacity of Featherstone (and its periphery) to meet a proportion of additional housing needs. In this regard, Peveril considers the site shown on plan 11A (2.5 hectares) to be an appropriate candidate for additional housing to take place given it is of a size which is proportionate to the existing size of Featherstone and can make use of the existing facilities within the settlement. It is also very close to the Royal Ordnance Factory site which has recently been resolved to grant planning permission by the Council. It is the case that the site will be delivering large scale employment development within the early years of the Plan period and therefore it makes sense in terms of sustainability and encouraging people to live close to where they work to encourage new housing at a sensible scale on the edge of Featherstone. There is already housing proposed on the western edge of Featherstone and the site Peveril is suggesting at some 2.5 hectares is not strategically significant in terms of its relationship with Featherstone. A proposal to remove it from the Green Belt – and establish defensible long term boundaries could be easily accomplished given the location of the site and its boundaries with the adjacent prison and ROF site. Therefore, Peveril suggests the site shown on plan 11A be added to the table of housing allocations in Policy SA5.

3. Development strategy related to employment land
4. Proposed allocation of extension to Hilton Cross site

Peveril has been a long term supporter of the strategy for employment in the extant Core Strategy and SAD that emphasises the need to deliver for strategic employment sites for employment given their ability to deliver quality employment land because of their location and linkages. Peveril has been joint applicant (with St Francis Group) on the application resolved to be granted on that site for employment purposes on the Royal Ordnance Factory and would welcome the continued support for ROF and its identification of that site and indeed the other strategic sites in the Core Strategy within the Local Plan Review.

However, whilst Peveril also welcomes the allocation of the WMI site, it notes from table 9 that the Council' intention in the Local Plan period is to deliver approximately 340 hectares of employment land in the period 2018 to 2038. However, approximately 70% of that provision (about 232 hectares) is intended to come forward on one site, ie the WMI site. That is identified as potentially meeting specific large scale manufacturing and distribution needs. It is important to note that paragraph 5.15 of the Local Plan Review states this will be "balanced by smaller scale employment opportunities at Hilton Cross". The Hilton Cross site has historically been identified as an important strategic employment site both in the Core Strategy and the SAD – mainly for previously B1 uses. However, there is only a relatively small part of the site – some 5 hectares – that are now available to be taken up. Therefore, in order to recognise the benefits that the Hilton Cross site has to complement WMI (specifically referred to in the Local Plan) it is necessary in Peveril's view that Hilton Cross should provide more land for well located small scale employment opportunities close to the M54. This will both complement the WMI proposals but also the large scale distribution opportunities that now exist (with planning permission) on the ROF site. Thus, the Council should look to specifically allocate an extension to the Hilton Cross site and Peveril is proposing (see plan 12A – 21.6 hectares) that land to the south of Hilton Cross should be specifically allocated for employment purposes – this should be for Class E(i), (ii) and (iii). The extension to the allocation of Hilton Cross can be made through a change to table 9 with an appropriate reference to the extension to the Hilton Cross site being made within the paragraph headed "The District's Free Standing Employment Sites" in Policy DS3.

The proposed allocation would be served by a new access from the A460 and its release would result in defensible boundaries to the Green Belt being established in the form of existing roads/tracks and tree belts. The importance of providing a range and choice of employment sites to go alongside the larger scale manufacturing/distribution proposals that are likely to be attractive on both the WMI site and the ROF site is fundamental to the delivery of the employment strategy across South Staffordshire.



In this regard, Peveril is aware that the current Core Strategy (Core Policy 7) allows for 'modest extensions' to the strategic employment sites including Hilton Cross to be supported should a robust case and reasoned justification is provided to support their extension.

In relation to the development management policy issues, whilst Peveril strongly recommends the Council proposes an allocation of an extension to Hilton Cross in the Local Plan Review, it should, at the very least, confirm that in the development management policies of the Plan (particularly Policy EC1) repeat Core Strategy policy allowing modest extensions of strategic employment sites to be permitted subject to the robust case being put forward.


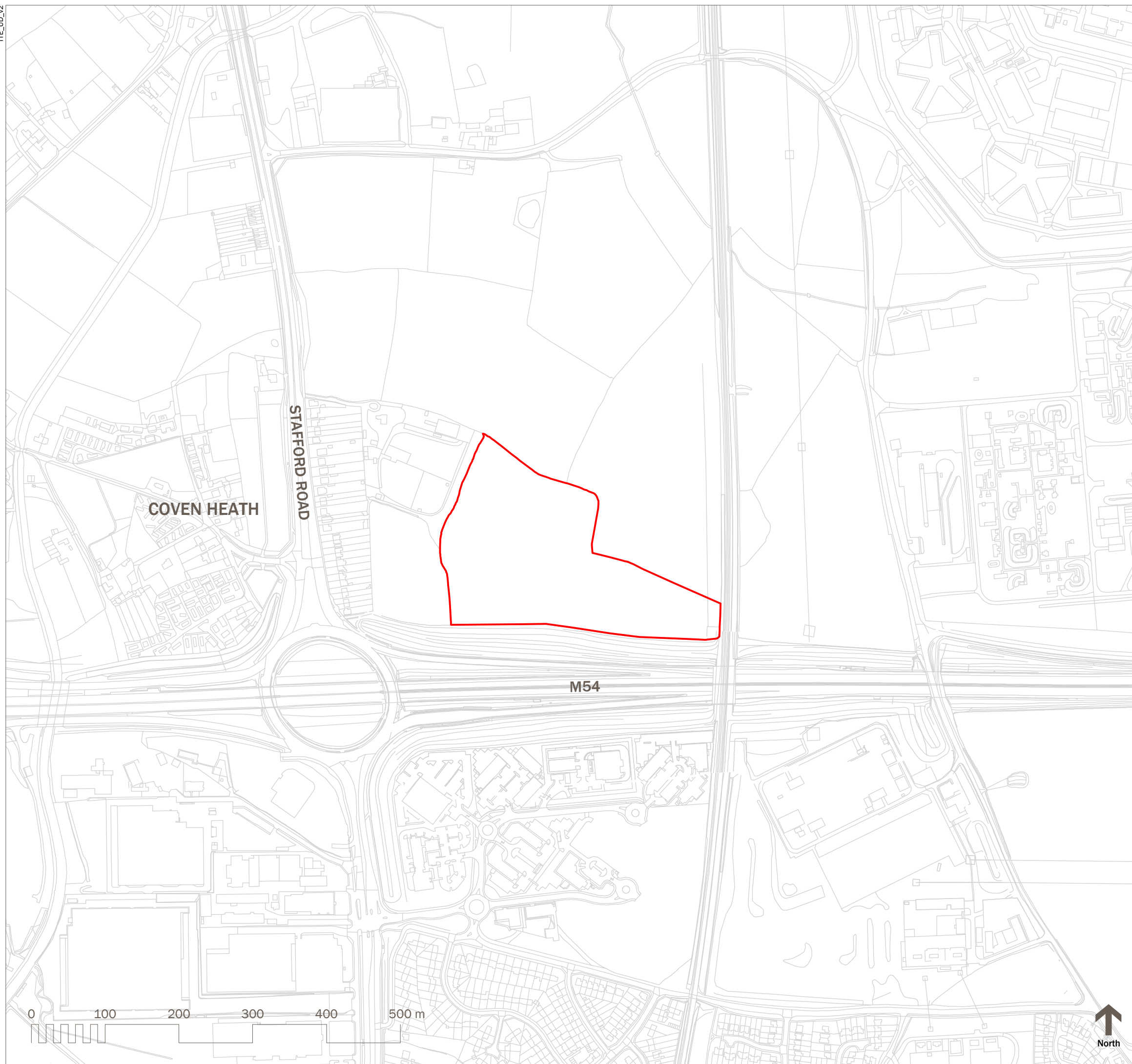
Peveril would be willing to discuss all matters raised by these representations with the Council, particularly relating to the Hilton Cross proposed extension and other matters related to residential development – which are likely to be raised in more detail when the Government has given more clarity on the housing land requirement calculations currently under consideration.

Yours faithfully



Simon Chadwick
Special Projects Director
CarneySweeney



Key
 Site boundary (5.6ha)


**South Staffordshire Local Plan
Review Representations**

Document control


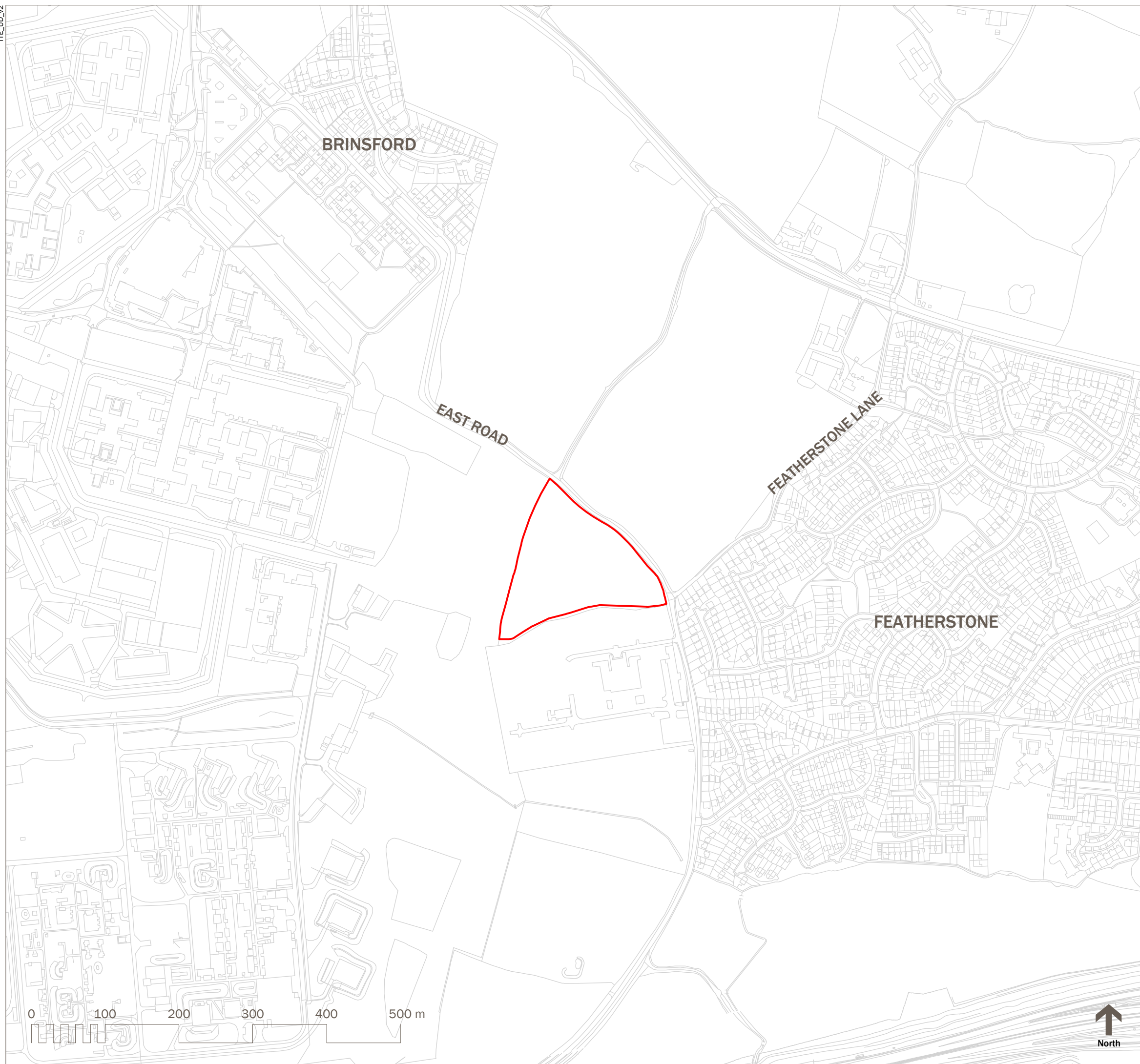
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
A	Updates to title block	10.12.21	BR	BR	AC
Rev	Description	Date	Dwn	Chk	App

Peveril Homes
 Land west and south of Featherstone, Staffordshire
 M54 Corridor (North of Wolverhampton)

LAND WEST OF WEST COAST MAINLINE

TTE Proj No	Drwn / date	Ch'ked / date	Appr'd / date	Scale @ A3	Suitability		
A099286	BR / DEC '21	BR / DEC '21	AC / DEC '21	1:5,000	-		
Client Proj No	Origin	Vol/System	Level/Loc	Type/Code	Role	Drwg no	Revision
-	TTE	00	XX	DR	UD	10	A

Issuing office
Tetra Tech Manchester
 Quay West at MediaCityUK
 Manchester M17 1HH
 Tel: 0161 872 3223

Key
 Site boundary (2.5ha)


**South Staffordshire Local Plan
Review Representations**

Document control

-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
A	Updates to title block	10.12.21	BR	BR	AC
Rev	Description	Date	Dwn	Chk	App

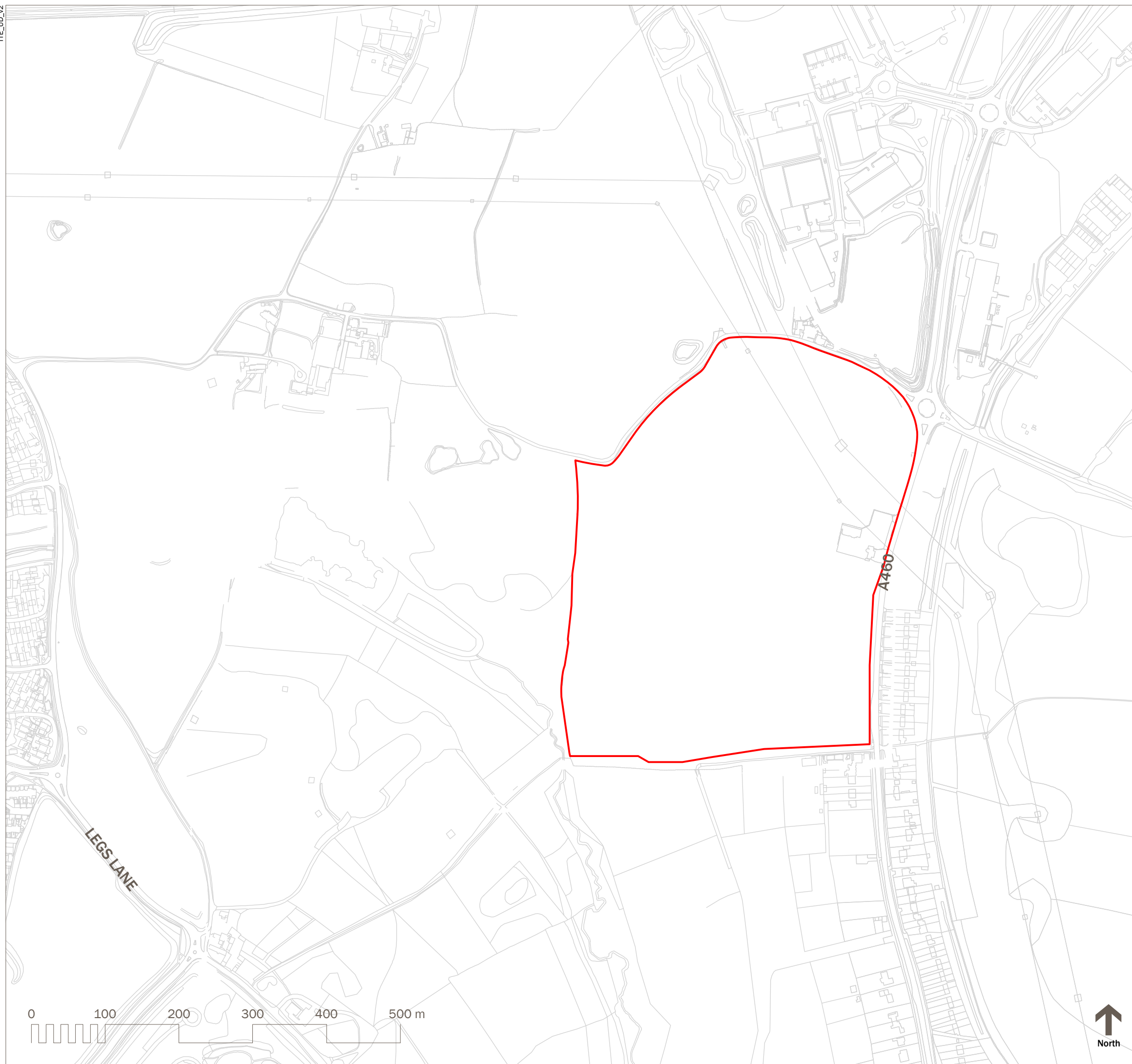
Peveril Homes
 Land west and south of Featherstone, Staffordshire
 M54 Corridor (North of Wolverhampton)

LAND NORTH WEST OF FEATHERSTONE

TTE Proj No	Drwn / date	Ch'ked / date	Appr'd / date	Scale @ A3	Suitability		
A099286	BR / DEC '21	BR / DEC '21	AC / DEC '21	1:5,000	-		
Client Proj No	Origin	Vol/System	Level/Loc	Type/Code	Role	Drwg no	Revision
-	TTE	00	XX	DR	UD	11	A

Issuing office
Tetra Tech Manchester
 Quay West at MediaCityUK
 Manchester M17 1HH
 Tel: 0161 872 3223

Key
 Site boundary (21.6ha)



**South Staffordshire Local Plan
 Review Representations**

Document control

-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
A	Updates to title block	10.12.21	LA	BR	AC
Rev	Description	Date	Dwn	Chk	App

Peveril Homes
 Land west and south of Featherstone, Staffordshire
 M54 Corridor (North of Wolverhampton)

**LAND SOUTH OF HILTON CROSS STRATEGIC
 EMPLOYMENT SITE**

TTE Proj No	Drwn / date	Ch'ked / date	Appr'd / date	Scale @ A3	Suitability		
A099286	LA / DEC '21	BR / DEC '21	AC / DEC '21	1:5,000	-		
Client Proj No	Origin	Vol/System	Level/Loc	Type/Code	Role	Drwg no	Revision
-	TTE	00	XX	DR	UD	12	A

Issuing office
Tetra Tech Manchester
 Quay West at MediaCityUK
 Manchester M17 1HH
 Tel: 0161 872 3223

