

SOUTH STAFFORDSHIRE LOCAL PLAN 2018-2038 REGULATION 18 CONSULTATION

**Representations on behalf of IM Land (unallocated land north and south
of Limepit Lane)**

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REPORT

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Prepared by:

RPS

Darren Oakley BA (Hons) MA MRTPI
Principal Planner - Planning

Prepared for:

IM Land

Contents

| | | |
|----|---|----|
| 1 | INTRODUCTION | 1 |
| 2 | DUTY TO COOPERATE | 2 |
| 3 | RESPONSE TO THE VISION AND OBJECTIVES | 4 |
| 4 | RESPONSE TO THE GROWTH STRATEGY (POLICY DS3) | 7 |
| 5 | RESPONSE TO THE DISTRIBUTION STRATEGY (POLICY DS3) | 10 |
| 6 | RESPONSE TO THE SUSTAINABILITY APPRAISAL | 14 |
| 7 | RESPONSE ON SITE ASSESSMENT AND SELECTION..... | 22 |
| 8 | RESPONSE TO THE GREEN BELT (POLICY DS1) | 26 |
| 9 | LAND AT LIMEPIT LANE, HUNTINGTON (UNALLOCATED LAND) | 30 |
| 10 | CONCLUSIONS | 33 |

Tables

| | | |
|-----------|--|----|
| Table 8-1 | Summary score on Green Belt purposes – preferred allocation site – TG note | 28 |
|-----------|--|----|

Figures

| | | |
|------------|--|----|
| Figure 5-1 | Housing Growth – Locality 1 – Huntington..... | 11 |
| Figure 6-1 | Sites assessed in the SAPOP (Sites 591 and 592) | 14 |
| Figure 6-2 | Preferred Options SA summaries for sites 591 and 592 (post-mitigation) | 14 |
| Figure 6-3 | RPS Sustainability Appraisal – unallocated land | 21 |
| Figure 8-1 | South Staffordshire Green Belt Study 2019 – extract showing Parcel S4B (shown pink outline)..... | 27 |
| Figure 9-1 | Alternative layout incorporating the unallocated land north of Limepit Lane ('Option 1')..... | 31 |
| Figure 9-2 | Alternative layout showing land south of Limepit Lane ('Option 2') | 32 |

Appendices

| | |
|------------|--|
| Appendix A | Vision Document for unallocated land north of Limepit Plan ('Option 1') |
| Appendix B | Vision Document for unallocated land south of Limepit Lane ('Option 2') |
| Appendix C | Technical Note and Analysis of Landscape and Green Belt Evidence, December 2021 (Tyler Grange) |

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 omission of land under the control of IML that lies north and south of Limepit lane ('unallocated land') in the POD, land which has been promoted by IML throughout the local plan review. A separate response to the POD has been prepared in respect of the Council's inclusion of land north of Limepit lane ('preferred allocation site'), also under IM L's control.
- 1.2 IML has previously submitted details of the unallocated land 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 representations on the unallocated land, two separate Vision Documents have been prepared. Appendix A relates to the unallocated land north of Limepit Lane. This land relates specifically to the 'balance' of land north of Limepit Lane, excluding the preferred allocation site. Appendix B relates to the unallocated land to the south of Limepit Lane. Both these documents are appended to this submission. These documents provide further details on the unallocated land, including high-level technical assessments covering a range of planning issues related to the Site. They show that the unallocated land can deliver sustainable development in this part of the District and would not undermine the purposes of the wider Green Belt in this location. Appendix C also provides further detailed commentary with respect to landscape and Green Belt as it relates to the unallocated land.
- 1.4 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.
- 1.5 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 DUTY TO COOPERATE

- 2.1 This section of the response considers the information published by the Council on how the legal requirements under duty to cooperate have been met. This section highlights concerns with the approach taken by the Black Country Authorities (BCAs) in addressing the requirements under the duty to cooperate. This relates to the detail needed to demonstrate effective and constructive engagement has occurred up to this point in the plan-making process.
- 2.2 RPS notes that the Council has published a Duty to Cooperate Topic Paper (DTC Paper), dated November 2021, alongside the POD, which has informed the comments set out here.
- 2.3 It is noted that the Council has not sought views from respondents on how the Council is addressing the duty obligation, given it has not posed any specific question on this subject area.

The Duty

- 2.4 The Duty to Cooperate (DTC) is a statutory duty for all Local Planning Authorities (LPAs), introduced in November 2011 through Section 110 of the Localism Act 2011, which established a DTC in relation to the planning of sustainable development. This is recognised in paragraph 1.1 of the DTC paper. The duty requires an active, ongoing and constructive approach to addressing strategic matters relevant to the new Local Plan.
- 2.5 Cooperation is seen as an integral part of Local Plan preparation and should result in clear planning policy outcomes capable of being demonstrated through the examination process. Notably, Planning Practice Guidance¹ recognises that it is too late at the examination stage to seek to retrospectively rectify any deficiencies identified in relation to the legal compliance part of the independent examination, which covers matters relating to the duty. Therefore, in order to reduce the risk of non-compliance with the duty, it is important that the Council provide a clear and up to date position at each stage in the plan-making process regarding progress made on dealing with strategic matters, most notably the identified housing shortfall across the wider-HMA. Based on comments set out below, RPS raises concerns on this issue.

Demonstrating effective cooperation

- 2.6 As highlighted in the POD (at paragraph 4.1 of the DTC paper), paragraph 27 of the National Planning Policy Framework (the Framework) makes clear that in order to demonstrate effective and on-going joint working:

"...strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in

¹ Paragraph: 031 Reference ID: 61-031-20190315 Revision date: 15 03 2019

national planning guidance, and be made publicly available throughout the plan-making process to provide transparency." (RPS emphasis)

- 2.7 It is, therefore, clear that in order to demonstrate that the Council has engaged effectively on strategic matters with their neighbours, the preparation of Statements of Common Ground (SOCG) should be undertaken earlier in the Local Plan Review process and should not be left until the latter stages of the plan making process. To do so, in our view would risk undermining the transparency and, wider credibility of the plan.
- 2.8 The Council does, recognise the significance of preparing SOCGs, stating at paragraph 3.7 of the POD:
- "Agreement through Statements of Common Ground are now a necessity and will document the cross-boundary matters that need to be addressed and what progress has been made in dealing with them."*
- 2.9 The Council has not yet issued any Statements of Common Ground alongside the POD. Early or draft versions of SOCGs, would set out the the formal position of the Council and how it has addressed the significant scale of unmet housing and employment need emanating from elsewhere in the wider-HMA at the Regulation 18 stage.
- 2.10 RPS notes that there are references at Appendix A of the DTC paper to the preparation of SOCGs as part of *'future proposed actions'* but clear outcomes are required as from the local plan review regarding the strategic matters at this stage.
- 2.11 Clarity is needed on how the engagement that has occurred to date has influenced the preparation of an effective policy outcome to deal with this strategic matter. This would then address national policy and tensure the Council meets its legal obligation for 'constructive and on-going' engagement required under the duty.

3 RESPONSE TO THE VISION AND OBJECTIVES

3.1 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?

3.2 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 new Local Plan (currently 2018 to 2038) and RPS has some comments make on this matter.

Plan Period

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

3.4 RPS does not agree with the end date of 2038 as proposed. Instead, RPS takes the view that the timescale for the new Local Plan 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 new Local Plan review. However, the end date for the Black Country Plan is currently 2039. This is one year ahead of the new Local Plan. This means that the new Local Plan 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

3.5 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 new Local 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 dwellings². This would generate an overall 'minimum' increase of 443 dwellings based on extending the new Local Plan forward one year from 2038 to 2039.

3.6 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 On the basis of 4,000 dwellings contribution over a 20-year period, equating to 200 dpa

- 3.7 RPS therefore recommends that the plan period for the new Local Plan 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.

Strategic Objectives

- 3.8 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.”

- 3.9 This in line with the paragraph 142 of the Framework and so is broadly welcomed. In this regard, as set out in separate representations, RPS supports the draft allocation of land at Limepit Lane, but would suggest that there is also the potential to deliver such improvements on larger land parcels, which supports the land available for environmental benefits as a proportion of the overall site area,. In addition to the to the current Local Plan proposals in the POD to allocate the land off Limepit Lane under IML’s control, further land to the north of the allocation north of Limepit Lane is available for development, and consideration potentially should be given to safeguarding land via the current Local Plan Review process (this is discussed in more detail in this submission).

- 3.10 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.”

- 3.11 RPS is supportive of policy measures that seek to deliver healthy communities by ensuring local people have access to local sport and recreation facilities. In this regard, IML is willing to offer future S106 contributions towards appropriate improvements to the facilities available at the nearby rugby club, which is acknowledged as being under pressure in terms of usage and therefore could benefit from additional investment in those facilities.

- 3.12 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 reflect the availability of services to local residents in neighbouring areas outside the District that are accessible to residents living in Huntington.

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.

4 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?

- 4.1 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

Starting point

- 4.2 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. However, it is unclear whether other relevant factors, including employment growth in the District, has been taken into account in determining the appropriate minimum level of housing need to be provided for in the new Local Plan.

Accounting for employment growth

- 4.3 Planning Practice Guidance³ identifies those circumstances that might justify a higher housing need figure than the standard method would indicate. This is because the standard method does not attempt to predict the impact that future government policies, changing economic circumstances, or what impacts other factors might have on demographic behaviour. This covers a range of factors, including '*growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth*'. This would include major new employment investment in the District that is not accounted for when projecting forward future housing need.
- 4.4 One such example is of relevance in South Staffordshire, notably the proposals to deliver the West Midlands Interchange (WMI) at Four Ashes. This site is allocated in the POD, under Policy SA7, with an expectation that 232.5 hectares of employment development will be delivered by 2038.

³ Paragraph: 010 Reference ID: 2a-010-20201216 Revision date: 16 12 2020

This scheme is also expected to deliver around 8,550 jobs in the District⁴. Paragraph 4.56 of the POD acknowledges that the WMI,

“...significantly increases the known oversupply of employment land in South Staffordshire, and with this, the scope to contribute towards unmet needs elsewhere in the FEMA...”

- 4.5 The total supply of employment land in South Staffordshire is estimated to be in the region of 340 hectares (see Table 9 of the POD). This is against an estimated need for between 67-86 hectares (see paragraph 5.11 of the POD). The estimated over-supply of employment land is therefore in the region of 254-273 hectares, depending on the scale of employment need. The delivery of the WMI project could therefore lead to a significant change in the demand for labour in the District, as well as potentially assisting in addressing unmet employment need from the Black Country. However, it is unclear from the published evidence whether the potential impact on the demand for housing within the District, as a result of the jobs growth at WMI, has been taken into account in determining the minimum local housing need figure now proposed in the POD. From the review of the published evidence undertaken by RPS, this appears not to be the case.
- 4.6 RPS therefore recommends that the Council revisits its assessment of local housing need in order to properly assess the impact of planned future employment growth in the District and to consider the implications of the significant level of over-supply of employment land identified in the POD.

Unmet housing needs from the wider housing market area

- 4.1 In addition to the minimum local housing need figure of 4,131 (which RPS raises concerns on as set out above), Policy DS3 proposes a contribution of 4,000 dwellings to assist in addressing the housing shortfall across the wider-HMA. This would therefore result in a total minimum housing requirement of 8,881 dwellings for period 2018-2038. Having reviewed the POD, RPS has a number of concerns with the approach taken on this matter.
- 4.2 Paragraph 4.10 of the POD clarifies that the 4,000 dwelling contribution is,
- “...based on the scale of growth implied in the district by the strategic locations identified in the GBHMA Strategic Growth Study...”*
- 4.3 The Strategic Growth Study (SGS) was published in February 2018, and covered need and supply of housing across the Greater Birmingham HMA up to 2036. The Council acknowledges that events have moved on since this study was published, notably the emergence of a substantial level of unmet housing need identified in the Black Country, totalling 28,239 dwellings up to 2039 once all sources of supply within the conurbation have been identified⁵. The scale of unmet need is higher than previous estimates, based in part on higher estimates of housing need for the Black Country (using on the standard method and 35% urban centres uplift) and lower estimates of

⁴ West Midlands SRFI Employment Issues Response Paper – Labour Supply, Stantec, May 2020

⁵ Draft Black Country Plan 2039 (Regulation 18) August 2021, paragraph 3.21

supply from land within the existing built-up area. Similarly, the scale of the shortfall is not only significant in scale but also extends beyond the end date of the SGS (2036) by three additional years, to 2039.

- 4.4 This new evidence on the housing shortfall in the Black Country was clearly not taken into account in the SGS as it post-dates that report. The SGS is therefore silent on matters relating to the housing shortfall in the Black Country now known today. RPS therefore contends that the position has changed to the extent that the SGS has potentially under-estimated the scale of the housing shortfall across the GBHMA, in particular from the Black Country. Due to the reliance placed on the SGS by the Council in determining the 4,000 dwellings contribution, the unmet need from the Black Country has not been properly factored into consideration of the overall contribution that South Staffordshire should be making towards meeting this shortfall. RPS therefore contends that the proposed contribution has not been adequately justified in light of all the available evidence. On this basis, RPS recommends that the Council should revisit the implications of the new evidence regarding unmet need from the Black Country and consider contributions in excess of the 4,000 dwellings currently proposed in the POD.
- 4.5 In conclusion, RPS as identified a number of issues in respect of the appropriateness of the housing requirement. These concerns should be considered further and addressed as part of the next iteration of the new Local Plan.

5 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?

5.1 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.

Spatial Strategy for Housing

5.2 RPS notes that the Council is maintaining its preference for an 'infrastructure-led' strategy for the distribution of growth, as stated in paragraph 4.60 of the POD. This carries forward the preferred strategy option (Option G) identified in the Spatial Housing Strategy and Infrastructure Delivery (SHSID) consultation in October 2019. In this context, Policy DS3 makes clear that throughout the District, growth will be located at the most accessible and sustainable locations in accordance with the settlement hierarchy, whilst recognising opportunities to deliver local infrastructure. The strategy also seeks to maintain and enhance the natural and historic environment and the local distinctiveness of the district and retain and reinforce current settlement patterns.

5.3 To achieve these broad aims, the distribution of growth is defined in Policy DS3, as follows:

- Tier 1 settlements - Penkridge, Codsall/Bilbrook and Cheslyn Hay/Great Wyrley.
- Tier 2 settlements - Wombourne, Brewood, Kinver, Perton and **Huntington**.
- Tier 3 settlements - Essington, Coven, Featherstone, Shareshill, Wheaton Aston, Patterningham and Swindon.
- Tier 4 settlements - Bednall, Bishops Wood, Bobbington, Dunston, Himley, Seisdon and Trysull.
- Tier 5 settlements – smaller settlements where only very growth is envisaged.
- Growth adjacent to the neighbouring towns and cities in the Black Country, comprising:
 - Land at Cross Green (includes reference to potential for a rail-based parkway on land safeguarded at this site).
 - Land north of Linthouse Lane.
 - Land at Langley Road.
- Growth adjacent to the town of Stafford.
- The district's five freestanding strategic employment sites (West Midlands Interchange, i54 South Staffordshire, Hilton Cross, ROF Featherstone/Brinsford and Four Ashes).

5.4 Table 8 of the POD provides a breakdown of how the housing growth will be distributed across the District based on the strategy and the settlement hierarchy, including the level of growth assigned to Featherstone. The POD (at paragraph 4.19) identifies a number of factors that have informed the housing numbers proposed for each settlement / broad location, as follows:

- The settlement hierarchy, informed by the Rural Services and Facilities Audit 2021.
- The evidence base, notably the GBHMA Strategic Growth Study 2018.
- the level of constraints present around each settlement / broad location.
- and what are loosely described as ‘national policy factors’.

5.5 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

5.6 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.

5.7 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 5-1 Housing Growth – Locality 1 – Huntington



5.8 RPS queries the proposal to deliver less than 1% of the District’s overall housing delivery at Huntington, given the status of the settlement with Tier 2. The growth proposed at Huntington is at a significantly lower proportion compared to that allocated to the other Tier 2 settlements, the next highest settlement being Brewood (at 1.8%).

5.9 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.”

5.10 As explained in this submission, RPS are of the view that a particularly cautious approach has been taken to the constraints on accommodating more growth at Huntington, particularly in terms of landscape sensitivity and Green Belt harm. In addition, there is an under estimation of the potential for delivery at the settlement, particularly in light of the proximity of Huntington to neighbouring urban areas.

5.11 On this basis, RPS would suggest that additional housing can be suitably accommodated at Huntington, and that this can be delivered on adjacent land to the draft allocation at Limepit Lane also being promoted by IML through this new local plan. In this context, RPS would suggest that a further explanation should be provided on the 0.9% of growth to Huntington. Evidence base relating to the Settlement Hierarchy

5.12 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)

5.13 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

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

5.15 The methodology under this criteria (at paragraphs 3.9-3.10 and 3.14 of the RFSA 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 relevant circumstances

5.16 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.

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

Potential for safeguarding of land at Huntington

5.1 In line with the development strategy, Policy SA5 identifies two sites for allocation at Huntington. One of these is Site 016. This site was identified as a 'Safeguarded Allocated Site' in the Site Allocations Document under Policy SAD3 of that plan. Site 016 was therefore previously part of the Green Belt before it was safeguarded.

5.2 However, once this site is allocated in the new local plan, there will be no other safeguarded residential sites identified at Huntington. RPS would suggest that, in the context of an ever decreasing supply of non-Green Belt brownfield land, in order to provide for an a continued and available release of land to meet future needs beyond the new plan period (to 2038) the Council should take the opportunity to identify safeguarded land to replace site 016. The analysis presented in this submission (section 8) provides evidence that sites 591 and 592 would not cause the level of harm to the wider Green Belt at Huntington as indicated in the Council's Green Belt evidence. On this basis, RPS suggest that it would be logical to consider identifying additional land, notably land at Huntington, for safeguarding in this local plan, consistent with previous approaches in other parts of the development plan for the District. Consequently, it is recommended that additional land should be safeguarded for future development and full consideration should be given to the wider parcel of land comprising site 591 .

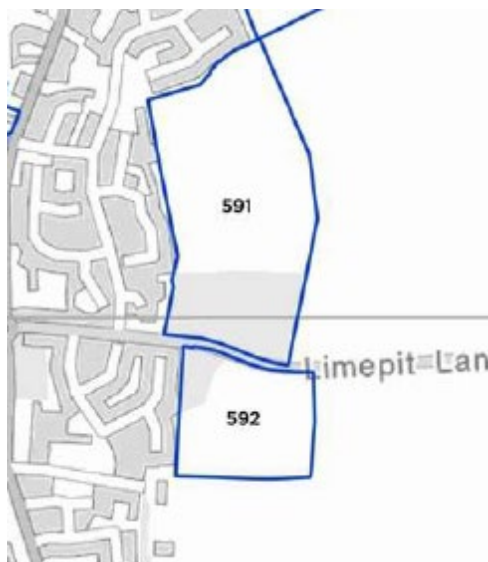
6 RESPONSE TO THE SUSTAINABILITY APPRAISAL

6.1 This section provides a response on the sustainability appraisal undertaken on the land under IML’s control. As detailed below, the land in question has been appraised under two separate site references (site ref. 591 and 592). 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’) and relate, as far as possible, to the unallocated land.

Summary of Council’s sustainability appraisal of sites 591 and 592

6.2 Figure 6.1 below is a plan showing the location of the unallocated land under IML’s control appraised in the SAPOP, extracted from the main SA report. The unallocated land is formed of the unshaded areas shown in white on the map below.

Figure 6-1 Sites assessed in the SAPOP (Sites 591 and 592)



6.3 Set out below is a summary table showing the appraisal summaries for the two assessed sites, taken from the SA main report, which include the unallocated land. These relate to the ‘pre- and ‘post-mitigation’ appraisals the unallocated land. For reference, the pre-mitigation summary is set out in Table 4.4 of the SAPOP, whilst the post-mitigation summary is set out in Table 6.1 of the SAPOP.

Figure 6-2 Preferred Options SA summaries for sites 591 and 592 (post-mitigation)

| Post-mitigation | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 |
|-----------------|---------------------------|---------------------------|-----------------------------|-----------------------|-------------------|-------------------|---------|--------------------|-------------------|---------------------------|-----------|----------------------|
| | 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 | | | | | | | | | | | | |
| 591 | +/- | + | +/- | -- | 0 | - | + | - | 0 | - | - | - |
| 592 | +/- | + | +/- | -- | 0 | - | + | - | 0 | - | - | - |

- 6.4 The Council considers the unallocated land to have a number of negative effects for residential development, even after mitigation measures are taken into account. RPS has reviewed the evidence presented by the Council in the SAPOP, and does not agree with the findings against a number of SA objectives. This is set out below.

RPS response on significant effects – unallocated land

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

SA Objective 4 - Landscape and Townscape

- 6.6 The Council has determined a ‘major negative’ effects 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’.
- 6.7 RPS objects to the findings of effects against this objective. Firstly, in respect of Green Belt, RPS would question the relevance of including consideration of Green Belt under this objective, given the fact that Green Belt is a ‘strategic’ designation based on five purposes that do not relate to landscape factors.
- 6.8 RPS does not agree with the Council that development on these sites would cause ‘high’ harm to the wider Green Belt in this location. The appraisal finding of ‘high’ harm has been taken from the Council’s Green Belt Study (GBS) 2019 report, prepared by LUC. As explained in this submission, the unallocated land was assessed as part of a much larger assessment parcel at both stage 1 and stage 2 of the GBS (S4 and S4bs1, respectively). Furthermore, the GBS has applied incorrect boundaries for the unallocated land, which do not accord with the proposals submitted by IML as part of the Spatial Strategy for Housing and Infrastructure (SSHID) consultation in 2019. As a result, the GBS has not assessed the contribution or harm against the correct boundaries being promoted through the local plan. On this basis, RPS considers that further work is needed to the GBS, for this to be a robust evidence base to inform the SA.
- 6.9 In relation to landscape sensitivity, the same problem applies in that the appraisal of ‘moderate-high’ sensitivity is again based on a much larger land parcel (SL86), set out in the South Staffordshire Landscape Sensitivity Assessment Final Report also prepared by LUC, in July 2019, that does not accord with the boundaries of the unallocated land (as detailed above), and has also applied incorrect (larger) boundaries for the unallocated land. RPS therefore questions the evidential basis for the appraisal findings.
- 6.10 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 unallocated land (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).
- 6.11 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 unallocated land to development should be reduced to 'medium'.

- 6.12 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 unallocated land 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.
- 6.13 Based on the above, RPS contends that the appraisal of the unallocated land should be amended to 'minor negative' under this objective.
- 6.14 The evidence provided in the Technical Note (see section 4) also illustrates the mitigation measures that can be incorporated into the design and layout of development to mitigate any potential landscape impact.
- 6.15 On this basis, RPS recommends that the impact is likely to be 'moderate' at worst, which would equate to a 'minor negative' effect, representing an improved score for the unallocated land. The Council should therefore revisit the appraisal under this objective in light of these comments and the Technical Note prepared by Tyler Grange, and amend the scoring for both sites accordingly.

SA Objective 6 - Natural Resources

- 6.16 The Council has determined a 'minor negative' effect in relation to this SA objective. This is due to the site 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).
- 6.17 In response, given the size of the unallocated land (c. 9.7 hectares in total) and the need to incorporate sustainable drainage, public open space, site-specific infrastructure / green belt

compensation measures, before any housing is provided, it is unlikely that any development would result in the 'inefficient use of land'. Similarly, none of the unallocated land is designated for its ecological value.

6.18 .

6.19 In light of the above, RPS contends that the 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

6.20 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'

6.21 Having reviewed the Council's, RPS disputes the overall score of 'minor negative' assigned to the unallocated land.

6.22 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.”

6.23 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.

6.24 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)⁶. 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 the proximity of sites to local services.

6.25 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.

6.26 Therefore, when applying a reasonable approach with respect to accessibility to local health services, RPS contends that, in overall terms, the score for unallocated land should be 'minor positive'.

SA Objective 10 – Transport and Accessibility

6.27 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'.

6.28 RPS disputes the assertion that the unallocated land 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, the unallocated land scores 'minor positive'. It should also be noted that Hednesford Railway Station is 2.5km from the unallocated land, and is the closest to the station of any of the site options at Huntington. Whilst outside the target distance (2km), the unallocated land is still within reasonable distance of a rail station, in the context of a rural district such as South Staffordshire.

⁶ <https://www.royalwolverhampton.nhs.uk/services/>

6.29 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, as is the case with the unallocated land. 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 unallocated land scores positively in four out of five 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 unallocated land would, on balance, have a 'minor positive' effect under this objective.

6.30 On this basis, RPS does not agree with the 'minor negative' score for the unallocated land. Consequently, the score should be amended to 'minor positive'.

SA Objective 11 - Education

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

- Secondary schools – the unallocated land is located outside the target distance (1.5km) to the nearest secondary school.

6.32 The 1.5km threshold applied under this objective equates to a distance of less than one mile (0.9 miles). However, both national⁷ and local⁸ 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 unallocated land 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.

6.33 RPS therefore disputes the basis for the criteria identified in the SA methodology, and thus disagrees with a 'minor negative' score applied to the unallocated land against this objective. When applying official distance thresholds to measure access to schools, the unallocated land would score 'minor positive' against this objective.

6.34 On this basis, RPS recommends that the score for the unallocated land should be amended to 'minor positive'.

SA Objective 12 – Economy

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

⁷ Department of Education, *Home to school travel and transport guidance Statutory guidance for local authorities* July 2014

⁸ Staffordshire County Council *Home to School/College Travel Policy and Guidance* Updated June 2021

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

6.36 RPS disputes this score. The SA methodology (see Box 3.12) defines ‘minor negative’ as follows:

“Residential-led development proposals that would place site end users in locations with unreasonable or poor access to employment opportunities (the lower half Hansen scores, or adjacent to a village/urban area with Hansen score coverage to some extent) would have a minor negative impact on access to employment opportunities.” (RPS emphasis)

6.37 And for ‘minor positive’ impacts, this is defined as,

“Residential-led development proposals that would place site end users in locations with good or reasonable access to employment opportunities (the upper half Hansen scores) would have a minor positive impact on access to employment opportunities.” (RPS emphasis)

6.38 In relation to the use of Hansen scores for the appraisal of sites against this objective, the SAPOP (see paragraph 3.12.3) states:

“Hansen scores for public transport access to employment opportunities were used, which measured the number of destinations which could be accessed within 60 minutes journey time.”

6.39 The SAPOP provides very little supporting analysis to justify this score. Nonetheless, it is important to note that the Hansen scoring approach has been applied by the Council in the Rural Services and Facilities Audit (RSFA) of settlements. The RSFA defined Huntington, and thus sites 591 and 592, as having ‘medium’ access to employment’ (see Appendix 4 and 5 of the RSFA). Based on this finding, it is wholly wrong to suggest that Huntington, and the sites specifically, have ‘unreasonable’ access to local employment opportunities.

6.40 Given that locations with ‘good’ access to employment would fall within the ‘upper quartile Hansen score’ (see table on paragraph 3.18/page 7 on the RSFA for the full list of scoring criteria), RPS considers it reasonable to assume that those locations with ‘medium’ access to employment would be deemed as falling within the ‘upper half’ of the Hansen score. This would seem reasonable given the number and range of local employers and jobs within close proximity to Huntington and to the site, notably at Cannock town.

6.41 RPS also notes that the RSFA (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 unallocated land would place site end users in locations with good or reasonable access to employment opportunities.

- 6.42 On this basis, RPS contends that the SAPOP has wrongly applied the findings of the RSFA in light of Huntington’s accessibility to local employment. In addition, the SAPOP has not taken into account the proximity of existing employment provision at Huntington. As a result, the SAPOP has wrongly scored the unallocated land as being in a location that is within the lower half of the Hansen score and thus has ‘unreasonable’ access to local employment. Accordingly, the Council should identify the correct effect consistent with the SA methodology.
- 6.43 The correct score in RPS’ view, as defined in the methodology, is ‘minor positive’.

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

- 6.44 Based on the foregoing analysis, RPS has adjusted the SA findings for sites 591 and 592. This is set out in the table below.

Figure 6-3 RPS Sustainability Appraisal – unallocated land

| | 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 | | | | | | | | | | | | |
| Unallocated land (RPS) | +/- | + | +/- | - | 0 | +/- | + | + | 0 | + | + | + |
| SSLP 591 | +/- | + | +/- | -- | 0 | - | + | - | 0 | - | - | - |
| SSLP 592 | +/- | + | +/- | -- | 0 | - | + | - | 0 | - | - | - |

- 6.45 In conclusion, once the appraisal has been applied, on a fair and reasonable basis, it is clear that to the unallocated land performs better in terms of sustainability than the Council’s appraisal might suggest. The appraisal undertaken by RPS shows that the unallocated land 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.
- 6.46 The analysis set out here demonstrates that the unallocated land would deliver good sustainability outcomes were they to be brought forward for residential development. Consequently, in sustainability terms, RPS contends that the unallocated land is suitable for residential development and should give greater consideration by the Council for allocation in the local plan on that basis.

7 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?

- 7.1 This section provides a response on Council's approach to site assessment and selection, with particular attention given to the assessment of parcels 591 and 592, in which IML has an interest.
- 7.2 RPS notes that the consultation does not include a question on omission sites (relevant to site 592) and so a response on that matter is set out here.
- 7.3 Draft Policy SA5 lists the housing allocations identified to meet the district's housing target up to 2038. As mentioned previously, RPS notes that part of site 591 has been identified as a preferred option site allocation in the POD, under the description '*Land at Oakland Farm, north of Limepit Lane*'. RPS also notes that site 592 which has not been proposed for allocation under this policy. 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). RPS provides a response to this document, and other related evidence, in the rest of this section.

Summary of Council's assessment of sites 591 and 592

- 7.4 Appendix 3 of the HSSTP provides the full details of the assessment of the unallocated land. Under the 'summary conclusions' the HSSTP identifies three 'key positives and negatives' for the unallocated land.
- 7.5 These are:
- Green Belt harm deemed to be 'high'.
 - Landscape sensitivity deemed to be 'moderate-high'.
 - Major negative impacts against landscape criteria in the SAPOP.
- 7.6 Other 'known constraints' identified by the Council in the site assessment includes the following:
- No unmitigable impacts on the historic environment from development on both sites.
 - Both sites are adjacent to Cannock Chase Area of Outstanding Natural Beauty (AONB).
 - Development would remove an area of agricultural land
 - Both sites are located within a Minerals Safeguarding Area
 - The site could provide access to pedestrian footways into the wider settlement.
- 7.7 In addition, the Council has also considered highway impacts as part of the assessment (see Appendix 2 of the HSSTP). This was based on comments provided by the County Highways Authority (CHA), at Staffordshire County Council. The highways impacts were '*Ok in principle*

subject to an appropriate access' but which '...may be subject to significant works to improve sensitive vis splay'.

7.8 The Council also found that the unallocated land is at low risk of flooding (being located in Flood Zone 1).

7.9 The HSSTP goes on to state in the same paragraph, that:

"...Establishing a site frontage on Site 592 may necessitate the removal of a substantial tree/scrub buffer on the site's north-western corner and a single consolidated site is likely to allow for greater open space/green infrastructure provision on-site than if the growth were split into two separate sites."

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

RPS response to the Council's assessment of sites 591 and 592

7.11 Having reviewed the HSSTP and the supporting information used to inform it, RPS would like to seek some clarification on the conclusions of the Council's site assessment for the unallocated land.

7.12 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 of the unallocated land. RPS considers that Green Belt harm and landscape sensitivity assigned in the Council's evidence has been determined from incorrect site boundaries that reflect assessments against much larger parcels of land. If the assessments are applied to the unallocated land the potential impacts are likely to be lower. The Technical Note prepared by Tyler Grange (Appendix C) included with this submission shows that, in respect of Green Belt and Landscape issues, these effects would be lower than predicted in the Council's evidence base.

7.13 Consequently, RPS suggests that the Council's conclusions regarding the potential Green Belt and Landscape effects from the unallocated land should be based on consideration of the relevant site boundaries.

7.14 On the 'other known constraints', RPS would like to point out that whilst some constraints may exist, none of them preclude residential development on the unallocated land, nor do they prevent the unallocated land from being allocated in the local plan for residential use.

7.15 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 from the unallocated land. In response to the point raised by the CHA on visibility splays on the unallocated land to the south of Limepit Lane, 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).

7.16 Furthermore, with regards to the potential loss of a 'tree/scrub buffer on the site's north-western corner' of the unallocated land south of Limepit Lane, RPS would like to clarify that this area lies

outside the site boundary, as shown in the concept plan in Appendix B. Therefore, development the unallocated land would not, in the view of RPS, impact on any trees or other green features in that location.

- 7.17 In summary, based on the foregoing analysis, RPS would suggest that there are no issues that preclude the Council from identifying the unallocated land in the new local plan.

Other relevant evidence

- 7.18 RPS would like to highlight other aspects of the evidence base that are of relevance to consideration of the unallocated land as potential allocations, 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.
- 7.19 The SHELAA provides a brief assessment of the unallocated land (see Appendix 6 of the SHELAA), which is broadly supportive. The SHELAA assesses both sites as being '*...Potentially suitable but subject to policy constraints - Green Belt...*'. The only constraint of any significance is therefore the current Green Belt boundary that covers the unallocated land. Furthermore, the SHELAA does not identify any other, specific constraints beyond the policy constraint that would prevent development coming forward on the unallocated land.
- 7.20 On the basis of the information set out in the SHELAA, and subject to the release of the unallocated land from the Green Belt, the Council accepts there is potential to deliver additional homes at Huntington should they be required.
- 7.21 In conclusion, RPS recommends that the site assessments provided by the Council in the HSSTP are reviewed in light of the comments made in this submission in respect of the unallocated land, which can be considered as possible housing site allocations or safeguarded land areas that could be identified in the new local plan.

Response on exclusion of the unallocated land

- 7.22 RPS notes that the unallocated land has been omitted from the POD. The reason given is set out in the site assessment proforma, which states:
- "Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 016 and 591."*
- 7.23 Firstly, RPS notes that there is no explanation given for the specific exclusion of the unallocated land north of Limepit Lane. On the basis of the analysis presented in this submission, RPS contends there are good planning reasons to include this land as an allocation in the new Local Plan.

- 7.24 Secondly, RPS would point out that the unallocated land south of Limepit Lane scores very similar in terms of its sustainability credentials to that of land north of Limepit Lane. In addition, the unallocated land south of Limepit Lane is also considered by the Council to be suitable and available for development, subject to adjustments being made to the adopted Green Belt. Furthermore, it has no constraints that preclude development from coming forward in the short-term, and is thus achievable, similar to the unallocated land and preferred allocation site north of Limepit Lane. RPS contends that the unallocated land south of Limepit Lane is equally deliverable and developable as those sites identified in the POD.
- 7.25 Furthermore, the identification of the unallocated land in the new Local plan would also be consistent with the Council's objective to deliver a 'single consolidated' site (albeit crossed by Limepit Lane) on land under the control of a single site promoter (in this case, IML). This would offer greater potential to deliver greater benefits for green infrastructure and Green Belt compensatory measures.
- 7.26 On this basis, RPS suggests there are good planning reasons to support residential development on the unallocated land. The unallocated land should therefore be given greater consideration as a potential for allocation or for safeguarding in the new local plan.

8 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?

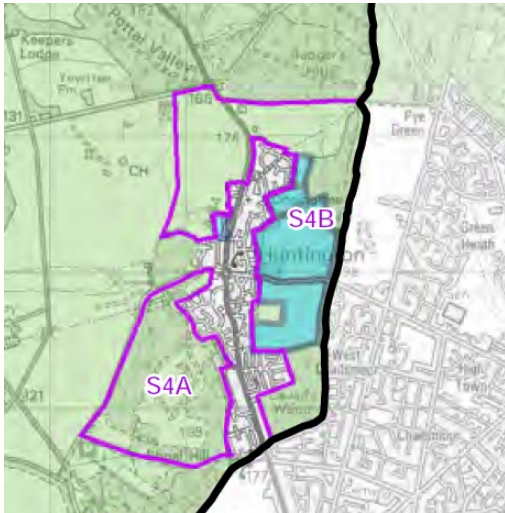
Approach to Exceptional Circumstances

- 8.1 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.
- 8.2 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.
- 8.3 Nonetheless, representations set out elsewhere in this submission argue that the housing needs of the District could be higher than suggested by the Council, and that the contribution (currently 4,000 dwellings) towards the unmet needs across the wider-HMA should be revisited in light of the recent proposals published in August 2021 by the Black Country Authorities as part of its local plan review, which has established a scale level of unmet need far greater than previous estimates suggested when the 4,000 contribution was originally consulted by the Council on in 2018. In this context, RPS suggest that the release of Green Belt under the control of IML, as advocated in this submission, and which is currently not supported by the Council, is an appropriate strategy .

Comments on Council's assessment of the unallocated land

- 8.4 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 unallocated land 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 unallocated land. In this scenario, given the size disparity between parcel S4 and sites 591 and 592, 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.
- 8.5 Stage 2 of the GBS therefore sub-divides parcel S4 into smaller units and unallocated land is located within 'Parcel S4B' (see Figure 8.1 below).

Figure 8-1 South Staffordshire Green Belt Study 2019 – extract showing Parcel S4B (shown pink outline)



Taken from GBS 2019, Figure 7a

8.6 The Council’s analysis for this sub-parcel states (taken from Appendix 3 of the GBS report):

“The sub-parcel makes a strong contribution to preventing sprawl of the large built-up area of Cannock and preventing encroachment on the countryside. Although the eastern part of the sub-parcel is largely edged by inset development, the ridge crest and tree cover of Huntingdon Belt and Cavan’s Wood provide strong separation between the sub-parcel and the West Chadsmoor and Hednesford areas of Cannock. Therefore the sub-parcel between Huntingdon and West Chadsmoor does not have a strong sense of containment and the release of this land would constitute a partial weakening of the Green Belt. Land to the west of the A34 in the northwest of the sub-parcel has less distinction from the inset settlement, directly adjoining Huntingdon to the southeast, however expansion of Huntingdon into this part of the sub-parcel would increase urban influence upon surrounding Green Belt land and would not create a stronger Green Belt boundary than the existing boundary of the inset area. In addition, the wooded hill within Littleton Colliery Spoil Mound SBI on the south western edge of the sub-parcel is a prominent marker for the western extent of the inset settlement, and therefore any development to the north of this would weaken its role in this respect. Release of this land would therefore affect adjacent Green Belt and the existing Green Belt boundary, constituting a limited weakening of the Green Belt.”

8.7 The Council therefore assigns a ‘high’ harm rating were land to be released for development from this sub-parcel.

8.8 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 unallocated land combined measures c. 9.7 hectares (based on measurements set out in the vision document). This area is significantly smaller than parcel S4B, some 19 times smaller to be precise. The unallocated land therefore comprises only a small fraction of the overall parcel. Therefore, the release of the unallocated land would only constitute about 5% of the larger parcel. However, no account is taken of this in the GBS findings.

- 8.9 Secondly, as highlighted elsewhere in this submission, and illustrated in figure 8.1 above, the GBS has applied incorrect site boundaries for the unallocated land. As can be seen, the extent of the unallocated land assessed in the GBS includes all the land from the eastern edge of Huntington to the edge of administrative boundary with Cannock District. These areas also overlap with the boundary of the Cannock Chase AONB (though is not relevant for the Green Belt assessment, it is still worth noting). The areas assessed in the GBS differ markedly from the actual boundaries being promoted by IML. RPS consider these differences to be significant and should be properly reflected in the GBS.
- 8.10 And thirdly, the unallocated land to the north of Limepit Lane of Lane does not extend eastwards beyond the existing extent of the built edge and is contained on the lower-lying slopes. The unallocated land therefore makes a lower contribution to the Green Let than the larger parcels considered by the Council in the Stage 2 GBS.

Site-Specific Assessment – unallocated land

- 8.11 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 C). In summary, the unallocated land scores the following under each purpose and in terms of overall harm:

Table 8-1 Summary score on Green Belt purposes – unallocated land – 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 | |

- 8.12 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.

Green Belt Compensation

- 8.13 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.'

- 8.14 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.
- 8.15 In this regard, the unallocated land lies adjacent to the existing built edge of Huntington and has the capacity to accommodate development that can be sensitively designed and located on the lower slopes to the east of Huntington.
- 8.16 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 unallocated land.
- 8.17 Development on the unallocated land 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.
- 8.18 In this context, this submission includes two additional 'options' for consideration as site allocations as part of the new Local Plan, and are shown on the concept plans set out in the Vision documents appended to this submission. More details on this are provided in the next section.

9 LAND AT LIMEPIT LANE, HUNTINGTON (UNALLOCATED LAND)

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

- 9.1 In part, no.RPS welcomes the proposal to allocate part of site 591 (titled 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. This is addressed in separate representations submitted on behalf of IML.
- 9.2 Nonetheless, as discussed 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. RPS suggests this can best be achieved in two ways; increasing the quantum of growth on the preferred site allocation at Limepit Lane; or potentially increasing the site boundary beyond the current allocation boundary drawn for the Limepit Lane site, in order to accommodate additional growth. Set out below are a number of site capacity options prepared that should be given consideration alongside the preferred allocation site set in the POD.

Options for development

Option 1

- 9.3 This submission has shown that there are justifiable reasons for identifying additional growth at Huntington and that the whole of the land north of Limepit Lane, including the unallocated land north of Limepit Lane, could be brought forward without significant impact on the site or its surroundings.
- 9.4 In this context, an alternative ('Option B') has been devised based on the full extent of the unallocated land north of Limepit Lane. This has involved a re-configuration of the previous indicative concept plan submitted at earlier stages of the local plan review. The concept plan for option 1 is set out in **Appendix A** of this submission shows the capacity under this option would be approximately 152 dwellings (at 38 dph across a net developable area of 4.01 hectares), showing how a more substantive scheme could be achieved. The image below shows the concept plan for Option 1.

Figure 9-1 Alternative layout incorporating the unallocated land north of Limepit Lane ('Option 1')



9.5 The concept plan also shows the extent of landscaping that could be laid out beyond the site boundary, to assist in mitigating any perceived impacts on the setting of the AONB. Utilising a larger sites would be beneficial in terms of the potential for additional green infrastructure and Green Belt compensatory measures to be designed into the proposals.

Option 2

9.6 In addition to Option 1, Option 2 would comprise the unallocated land immediately to the south of Limepit Lane (comprising the land assessed under site ref. 592). This part of the proposal would no longer include a new sports pitch, but could aid in the financial contribution towards qualitative improvements to local sports provision in Huntington.

9.7 The concept plan set out in Appendix B of this submission and shows the capacity under this option would be approximately 48 dwellings (based on 38 dph across a net developable area of 1.26 hectares). This option could either be allocated in its own right alongside option 1 above or or, if preferred, the site could be safeguarded for residential development and allocated as part of a future plan review, following its release from the Green Belt. This would be consistent with the current approach proposed in the POD, but which will also leave Huntington without any safeguarded land unless it is replaced.

9.8 A plan showing the layout is appended to this submission (**Appendix B**), with an extract shown below.

Figure 9-2 Alternative layout showing land south of Limepit Lane ('Option 2')



9.9 The concept plan also shows the extent of landscaping that could be laid out as part of development on the site, 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, including the AONB.

10 CONCLUSIONS

- 10.1 These representations have been prepared on behalf of IM Land, with respect to their interests in the 'Land at Limepit Lane, Huntington' (the Site'). This submission provides a response to the Council's decision to omit from the POD land at Limepit Lane, Huntington under IM Land's control ('the unallocated land').
- 10.2 RPS sets out below the conclusions drawn from this submission:
- The approach taken on duty to cooperate could be considered contrary to national policy, due to a lack of any statements of common ground being made available at this stage, and therefore the Council runs the risk of not meeting its legal obligation to 'constructive and on-going' engagement required under the duty.
 - The POD also plans to significantly over-allocate land for employment growth, but this does not appear to have been considered in determining the local housing need figure for the District. RPS recommends that the Council should assess the potential housing-related growth implications of an above-trend employment growth strategy, to ensure that sufficient homes are provided to meet that employment growth and so as not to encourage unsustainable commuting patterns. Similarly, RPS recommends that the Council should revisit the implications of the new evidence regarding unmet need from the Black Country and consider contributions in excess of the 4,000 dwellings currently proposed in the POD.
 - With regards to the proposed distribution of growth, RPS would suggest that additional housing can be suitably accommodated at Huntington, and that this can be delivered on the land being promoted by IM Land through the local plan review at Limepit Lane. In this context, RPS suggest that more explanation should be provided on the decision to only allocate 0.9% of growth to Huntington. RPS and IM Land contend that this proportion of growth could be increased in a wholly sustainable manner, as demonstrated in the supporting Vision Documents for the unallocated land.
 - The POD also proposes to allocate a site previously safeguarded for future residential development at Huntington (site re. 016). By doing so, this will mean that there will be no safeguarded land at Huntington, or across the District, were the plan to be adopted in its current form. Therefore, the Council should give consideration to identifying new sites to safeguard for future development and identify these in this local plan review. If it is decided that additional land should be safeguarded for future development, consideration should be given to the of the balance of land comprising the remainder of site 591, and site 592, described here as 'the unallocated land'..
 - In this context, this submission includes two additional 'options' (Options 1 and 2) based on two separate visions for consideration as site allocations and / or safeguarding for future development as part of the local plan review,.

- Option 1 would include the unallocated land north of Limepit Lane, offering the potential to deliver an additional 158 dwellings adjacent to the preferred allocation site. Option 2 would cover the land south of Limepit Lane, and which could accommodate a further 48 dwellings.

- 10.3 This submission should be read alongside separate submissions also made on behalf of IM Land, with respect to the Council's proposals to allocate land north of Limepit Lane for residential development in the POD ('the preferred allocation site').
- 10.4 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 for unallocated land north of Limepit Plan ('Option 1')

Appendix B Vision Document for unallocated land south of Limepit Lane ('Option 2')

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