

Strategic Planning Team  
South Staffordshire Council  
Council offices  
Wolverhampton Road  
Codsall  
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Our Ref: CCB/4203

16<sup>th</sup> November 2021

Dear Sirs

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**4867: SOUTH STAFFORDSHIRE COUNCIL LOCAL PLAN REIVEW PREFERRED  
OPTIONS CONSULTATION NOVEMBER 2021**

We have reviewed the Preferred Options consultation documents and the supporting evidence base and we welcome the opportunity to submit comments to the above consultation on behalf of our client UKPI (Featherstone) Ltd. focuses on site 397 Land adjacent to Brinsford Lodge, Brookhouse Lane, Featherstone which has been selected as a proposed allocated site.

We set out our responses to the questions posed below.

**Question 1:**

**Do you agree that the evidence base set out in Appendix A is appropriate to inform the new Local Plan? Yes/No**

**Please provide comments on the content or use of the evidence base set out in Appendix A, referencing the document you are referring to.**

In regards to the topics covered in the list of documents in Appendix A, yes we agree to the evidence base used to inform the new Local Plan.

**Question 2:**

**(a) Do you agree that the correct infrastructure to be delivered alongside proposed site allocations been identified in the IDP? Yes/No**

**(b) Is there any other infrastructure not covered in this consultation document or the IDP that the Local Plan should seek to deliver? Yes/No**

Yes, we have reviewed the IDP and have no objections to infrastructure requirements that are set out in the document in connection to Featherstone.

**Question 3:**

**a) Have the correct vision and strategic objectives been identified? Yes/No**

We do not object to the strategic objectives set out in Table 6 of the plan. It is important to note, not all developments will be able to meet all of the strategic objectives and that should not be found to be a criticism of the development if it remains that the proposed scheme is sustainable and otherwise policy compliant.

**b) Do you agree that the draft policies (Chapters 4 and 5) and the policy directions (Chapter 6) will deliver these objectives? Yes/No**

In regards to the proposed allocation site ref.397 Land adjacent to Brinsford Lodge, Brookhouse Lane, we have no objections to the draft policies in chapters 4 and 5 of the Local Plan. However, we do consider Featherstone has the ability to accommodate further development as it has a significant number of services and facilities to support the settlement and additional development.

**Question 4:**

**Do you support the policy approach in Policy DS1 – Green Belt and Policy DS2 – Open Countryside? Yes/No**

**If no, please explain how these policies should be amended?**

Policy DS1 – Green Belt is similar to both National and the current local planning policy for Green Belt.

We welcome the proposal for a separate GB SPD to be prepared which will take into consideration the latest updates in the NPPF published in July 2021.

Green Belt and open countryside policies should be in accordance with National Policy however it is also necessary to acknowledge sustainability should be factored into the suitability of sites for future development. A site located on the edge of a built-up area should be considered more favourably than a site located in a more rural area.

In regards to the alterations of both Green Belt and Open Space boundaries our comments will be submitted and discussed in response to Question 7.

**Question 5:**

**Do you support the policy approach in Policy DS3 – The Spatial Strategy to 2038? Yes/No**

**If no, please explain how this policy should be amended?**

Yes, we support the spatial strategy set out in policy DS3: The Spatial Strategy.

We agree Featherstone has the capacity to accommodate further development and welcome the inclusion of site 397 as a proposed allocation to accommodate housing in Featherstone.

**Question 8:**

**Do you support the proposed housing allocations in Policy SA5? Yes/No**

**Please reference the site reference number (e.g site 582) for the site you are commenting on in your response.**

We support the proposed allocation of site 397 in the emerging Local Plan.

We submit these representations on behalf of the landowners UKPI (Featherstone) Ltd and confirm their continued support for the inclusion of the site.

The site is a safeguarded site in the current plan and therefore we consider it the site should have been considered in the first instance as a proposed allocated site in the emerging Local Plan.

The site has been deemed suitable for removal from the Green Belt as indicated by its selection as a safeguarded site.

We have reviewed the comments about the site set out in Appendix C and can confirm vehicular and pedestrian access can be achieved via Malayan Way into the site to the north. However, an independent access can also be achieved direct onto East Road.

Consideration has been given to the surroundings of the site and all of the key infrastructure requirements included in Appendix C. We consider the site has the ability to accommodate a minimum of 39 dwellings and accommodate a mix of house types and an element of affordable housing. A development can be achieved on the site that would be policy compliant.

An appraisal layout has been prepared to give an indication of what could be accommodated on site and how access could be achieved. The appraisal layout has been prepared taking into consideration all of the key infrastructure requirements of the site.

The landowners are in discussions with developers, who are keen to commence development of the site following the adoption of the plan and securing planning permission.

We therefore can confirm the site is suitable, deliverable, developable, available and sustainable.

**Question 10:**

**Do you support the proposed allocation in Policy SA7? Yes/No**

We have no objections to the proposed employment sites set out in policy SA7- Employment Allocation – West Midlands Interchange.

**Question 11:**

**Do you agree with the proposed policy approaches set out in Chapter 6? Yes/No  
If no, then please provide details setting out what changes are needed, referencing the Policy Reference number (e.g HC1 - Housing Mix).**

We understand that the policies set out in chapter 6 are a combination of the adopted Core Strategy and Site Allocation DPD policies as a starting point and as a result of responses received to the 2018 issues and options consultation.

In regards to policy HC1: Housing mix, we understand the need to provide a greater number of 2- and 3-bedroom properties, however, it is also important to note that each development should be assessed on a case by case basis with the merits of each proposal taken into consideration. Also, there is the requirement for the key

considerations and characteristics of the site and the area/settlement in which the development is to take place should also be considered.

We therefore consider a level of flexibility should be applied to housing mix to ensure diversity and prevent all development looking the same and lacking any distinctiveness.

In connection to policy HC3: Affordable housing, we welcome the introduction of 30% affordable housing which we consider is an improvement on 40% as set out in the existing adopted Local Plan.

With the emphasis on the increase of 2 and 3 bedroomed properties on developments throughout the District in conjunction to the requirement for a contribution to meeting the needs of the District's ageing population in policy HC4- Homes for Older People, as previously stated, it is important to ensure that there is a level of flexibility and diversity on sites so individuality and uniqueness can be achieved.

**Question 12:**

**a) It is proposed that the fully drafted policies in this document (Policies DS1-DS4 and SA1-SA7) are all strategic policies required by paragraph 21 of the NPPF. Do you agree these are strategic policies? Yes/No**

**b) Are there any other proposed policies in Chapter 6 that you consider should be identified as strategic policies? Yes/No**

**If yes, then please provide details including the Policy Reference (e.g HC1 – Housing Mix)**

Yes, we agree policies DS1-DS4 should be strategic policies, despite any comments we made about the detail of the policies above.

Paragraph 21 of the NPPF states, "Plans should make explicit which policies are strategic policies<sup>14</sup>. These should be limited to those necessary to address the strategic priorities of the area (and any relevant cross-boundary issues), to provide a clear starting point for any non-strategic policies that are needed. Strategic policies should not extend to detailed matters that are more appropriately dealt with through neighbourhood plans or other non-strategic policies".

With the above taken into consideration, we do not consider policies SA1-SA4 should be included as strategic policies as they are fairly detailed policies which paragraph 21 states this should not include as that should be left to other non-strategic policies.

We welcome the opportunity to discuss this site in greater detail with South Staffordshire Council Planning Officers.

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