

Strategic Planning Team
South Staffordshire Council
Council offices
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Our Ref: CCB/4867

1st December 2021

Dear Sirs



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**4867: SOUTH STAFFORDSHIRE COUNCIL LOCAL PLAN REVIEW 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 and focuses on site 396 Land off New Road / East Road, Featherstone which has not 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.

There are a few concerns which we will set out in our answers to other questions below.

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. We welcome the introduction of the M54 to M6 link road being delivered by Highways England which we believe will bring significant improvements to Featherstone and the overall traffic improvements along A460 Cannock Road.

Question 3:

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

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b) Do you agree that the draft policies (Chapters 4 and 5) and the policy directions (Chapter 6) will deliver these objectives? 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 remain sustainable and otherwise policy compliant.

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.

In both the Green Belt and open countryside again, it is necessary to 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. However, we are disappointed the land off New Road/ East Road, Featherstone has not been selected as a proposed allocation in the Local Plan Review and remains in the Green Belt.

We consider the site should be allocated for residential development in the emerging plan or as a minimum released from the Green Belt and identified as safeguarded land for future development in the next Local Plan.

This would be in accordance with the NPPF paragraph 143c) which advises areas of safeguarded land should be identified in order to meet longer-term development needs beyond the plan period.

It has been extensively publicised that there is a lack of housing land within the wider Greater Birmingham Housing Market Area (GBMHA). This is the case beyond the Local Plan review period.

The Council have acknowledged a lack of land within the settlement boundaries and other brownfield sites that would be suitable to accommodate the District's own needs much less taking into consideration the needs of the wider Housing Market Area.

Further commentary about the specifics of site 396: Land off New Road/ East Road, Featherstone under 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.

However, we are disappointed to see site 396 Land off New Road/ East Road, Featherstone, not located within the Preferred Options consultation.

We consider Featherstone has the capacity to accommodate further development and would welcome the inclusion of site 396 as a proposed allocation to accommodate housing in Featherstone.

As a minimum we consider site 396 should be identified as safeguarded land for future development.

The site is a sustainable site located adjacent to the development boundary of Featherstone with the potential to accommodate a significant number of dwellings alongside the necessary infrastructure.

The site has the capacity to accommodate approximately 360 dwellings as indicated by the SHELAA.

As the site is located within the Green Belt, we consider the site should be removed from the Green Belt and identified as Safeguarded land.

Question 6:

Do you support the policy approach in and Policy DS4 – Longer Term Growth Aspirations for a New Settlement? Yes/No

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

We consider there should be increased emphasis on the safeguarding of sites on the edge of the built-up areas to cater for future development needs.

The proposed new settlement which will be focused around the transport corridor formed by the A449 and west coast mainline between Wolverhampton and Stafford will require a significant level of investment, infrastructure and collaboration between a high number of key players/ stakeholders including land owners, where there is also the potential for there to be more than one; housebuilders; the provision of infrastructure, services and facilities, including employment, education, medical needs and meeting the everyday needs of the new community of the settlement. The creation of a new settlement is a momentous task and despite the new settlement being planned for beyond the Local Plan Review period (beyond 2038), it is important to be realistic in the timeframes in which it will take to deliver a new settlement and therefore there should be the allocation of safeguarded land to cater for future development

needs beyond the plan period that can be delivered at a quicker rate and offer an alternative strategy.

The land west of Featherstone Lane, (site ref:396) should at the very least be allocated as Safeguarding Land.

Question 7:

a) Do you support the proposed strategic housing allocations in policies SA1-SA4? Yes/No

If no, please explain your reasons for this.

b) Do you agree that given the scale of the 4 sites detailed in policies SA1-SA4, these warrant their own policy to set the vision for the site, alongside a requirement for a detailed masterplan and design code? Yes/No

There are no principle objections to the proposed strategic allocations, however, there are concerns regarding the delivery of strategic development location: Land at Cross Green.

There is limited information surrounding the costing and delivery of the site and in particular the roads and infrastructure. This will be fundamental elements of the proposed development and the delivery of the 1200 dwellings, primary education and on-site open space with biodiversity improvements proposed.

We understand one of the fundamental elements of the site and why it has been chosen as a strategic allocation is due to the proposed link road between the A449 and ROF Featherstone and therefore we consider there should be more details available at this stage for interested parties to consider to make an informed choice in regards to the delivery of the site. Details such as delivery trajectory and all the key funding strands for the site should be considered at this stage due to the significant size of the site and what it is intended to deliver.

Should the site not fulfil the intended obligations or suffer any setbacks and delays there is the potential that The Council would have a significant shortage of land to meet the housing needs of the local plan period.

We therefore consider it is prudent and essential for the Council to allocate safeguarded land that has the ability to come forward to meet the needs of the District.

Site 369 which has house builder (DWH) support in addition to full support of the land owners, is located within a suitable walking distance from a range of services and facilities available within Featherstone, and benefits from existing high frequency bus services which pass the site. The site could deliver a significant number of homes early in the plan period in a highly sustainable location.

It is appreciated that the Council's evidence base, including the IDP, demonstrates there is currently a lack of highway capacity at Featherstone (particularly in regard to the A460). This capacity issue will be resolved through the delivery of the M54 / M6 / M6 Toll link road, the Development Consent Order for which is due to be made in 2022. Completion is anticipated for 2024. This will be well within the current plan period, any

policy proposing to allocate or safeguard land to the west of Featherstone might be subject to a policy that it should not come forward until the link road has been delivered.

We support the allocation of site 396 within the Local Plan at least as a Safeguarded site.

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 are disappointed to see site 396: Land off New Road / East Road, Featherstone has not been allocated as a residential site in the Local Plan Review.

Draft policy SA5 should include Site 369, or that part of it immediately to the west of Featherstone as a proposed allocation, or as a minimum safeguarded land due to the sustainability credentials of the site and its ability to accommodate a significant number of dwellings to meet the growing needs of both Featherstone and South Staffordshire District.

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 degree of flexibility and diversity on sites so there is individuality and uniqueness achieved.

Given that these policies directly relate to the delivery of new homes (particularly HC1 – HC3), in the context of NPPF Paragraph 68 the policies should be able to respond directly to local and up to date evidence such as housing need, which changes over time in line with market demand.

Policies on density should not be rigid, rather policies should be able to flexibly adapt and endure throughout the plan period. This will allow sites to come forward and ensure their attractiveness to house builders and home buyers.

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)

Policies DS1 – DS4 and SA1 – SA7 represent policies which are limited to those necessary to address the strategic priorities of the area providing a starting point for any non-strategic policies that are needed as defined by NPPF paragraph 21.

Paragraph 21 of the NPPF states, “Plans should make explicit which policies are strategic policies¹⁴. 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 would welcome the opportunity to discuss the site in greater detail with South Staffordshire Council planning Officers.

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