

SOUTH STAFFORDSHIRE DEPOSIT LOCAL PLAN
NOVEMBER 2003 PUBLIC CONSULTATION - SUMMARY OF
REPRESENTATIONS

1. Introduction

- 1.1 The Deposit South Staffordshire Local Plan was published for public consultation on 17th November 2003 and the eight-week consultation period ended on 9th January 2004. A series of public exhibitions were held across the district during the consultation period to explain the policies and proposals in the Deposit Plan. The consultation exercise was publicised in the local newspaper and a leaflet was published giving information about the Plan. The Plan was made available for inspection at the Council Offices, parish council offices, and local libraries and on the Council's website. An article about the Deposit Local Plan was also published in the winter edition of the "South Staffordshire Review".
- 1.2 The consultation exercise attracted an overwhelming response and 13,637 representations have been received. The breakdown of the response is as follows:
- a) 12,923 Objections to the policies and/or proposals
 - b) 615 Supporting Representations
 - c) 99 Comments on the policies and proposals or other aspects of the Plan
- 1.3 A wide range of detailed representations has been received from the general public, consultees and other interested groups together with representations from the development industry, landowners and commercial interests. Although many objections have been made to the Plan, the Council also received support for the proposals and proposals, particularly the conservation, recreation, landscape and nature conservation policies in the Plan.
- 1.4 A summary of the main issues and representations made on the housing and employment proposals and Wolverhampton Airport Policy Area are set out below together with a brief summary of the representations made on the other policies and proposals in the Plan. The individual representations made on the policies and proposals in the Plan are summarised in a background document.

2. Representations on the Housing Proposals

- 2.1 Objections have been made to six of the seven proposed housing allocations in the Deposit Plan and objections have been made to the proposed use of Green Belt/greenfield land for housing development particularly in respect of the proposed mixed-use site at Brinsford/Featherstone. A number of consultants, landowners and developers have suggested alternative housing sites that they consider are more appropriate than those proposed by the Council. The sites suggested are identified in the representations set out in a background document and are cross-referenced to location plans. The main objections raised in respect of each of the housing sites are summarised in paragraphs 2.5 - 2.14 below.

The Approach to the Identification of Housing Locations and Sites

- 2.2 Objections have been made to the Council's approach to the identification of housing locations and sites on the grounds that it does not accord with the sequential approach set out in Planning Policy Guidance Note 3 – PPG3 Housing. Objections have been made to the overall level of housing provision and that the Council has not identified sufficient sites to meet the Structure Plan housing requirement; that provision has not been made for long term development needs beyond 2011 and that there is an over reliance on windfall sites within the Plan period. In addition, there are objections that the Plan fails to make provision for a 10 year housing supply and that the Plan period should be extended beyond 2011. Other objections have been made to the affordable housing policy and the requirement for 30% affordable housing provision on the allocated sites and other sites coming forward for development in the district.
- 2.3 The principle objection to the housing proposals relates to the timing and deliverability of some of the sites proposed in the Deposit Plan and that the Council has not included a phasing policy or any mechanism to deal with any shortfall in the housing supply over the plan period. The issue of deliverability has specifically been raised in relation to the proposed sites at Brinsford/Featherstone and Campions Wood Quarry, Cheslyn Hay. The view has been put forward that the Council should identify areas of safeguarded land for long-term needs in the period after 2011 in accordance with Government guidance. There is also the view that sustainable non-Green Belt locations including the existing safeguarded land at Essington and Penkridge and land north of Penkridge should be considered before Green Belt locations.
- 2.4 Other objections have been made to the housing proposals on the grounds that the Council should release further areas of Green Belt land to meet the Structure Plan housing requirement and that, in accordance with PPG3, urban extensions to the main villages are the most sustainable option. These representations have been made by objectors in support of alternative sites that they wish to be allocated in the Plan.

Site 1 – Land at Former Littleton Colliery, Huntington (26 Objections)

- 2.5 Objections have been made to the allocation of this site principally on the grounds that the site is in the Green Belt and that Huntington is not identified in the Structure Plan as a location where a review of Green Belt boundaries would be appropriate. It is argued that there is no justification or basis for a change in the policy status of the site and that it should remain as a Major Developed Site in the Green Belt in accordance with the current adopted Local Plan. There have also been objections to the scale of development proposed and the view has been expressed that the number of houses proposed is excessive and inappropriate for this location and setting. Other objections have been raised on the grounds that Huntington is not a sustainable settlement and that the site has been fully restored and is not previously developed land.
- 2.6 Since the publication of the Deposit Plan an outline planning application for the development of 300 houses, open space and community facilities on the site has been approved by the Council subject to a section 106 agreement. The Parish Council and the Coal Authority support the proposed allocation.

Site 2 – Land at Engleton Lane, Brewood (16 Objections)

- 2.7 The principle objections to the allocation of the site are that that Brewood is not a sustainable settlement; that this is a greenfield site and is an inappropriate location for development. The allocation of the site is supported by the landowner and is generally supported by the Parish Council.

Site 3 – Land at Champions Wood Quarry, Cheslyn Hay (26 Objections)

- 2.8 Objections have been made to the allocation of this site principally on the grounds that the site is in the Green Belt; the proposal conflicts with national and strategic policy; it is not an appropriate or sustainable location for development; and that the proposal will sterilise valuable mineral reserves. The point has been raised that the site will require significant restoration to enable development to take place and consequentially there is uncertainty whether the proposal can be delivered by 2011.
- 2.9 There is particular concern that the proposal will have an unacceptable and serious impact on the landscape and that the site does not have defensible boundaries and will set a precedent for further development. In addition concern has been expressed that the development may affect protected species and that an environmental assessment should be carried out. The County Council and the Parish Council support the proposed allocation. The landowner generally supports the allocation but has raised objections to the number of dwellings proposed for the site and to the area defined for cemetery use.

Site 4 – Land at Walsall Road, Churchbridge, Great Wyrley (8 Objections)

- 2.10 Objections have been made to the allocation of this site on the grounds that it is close to the M6 Toll Road and the railway and is unsuitable for residential use and should be retained for employment use. There is also concern about possible contamination and that the Wash Brook flood plain may constrain development. The landowner generally supports the allocation but objects to the number of dwellings proposed for the site and retention of employment land. A detailed planning application has been submitted covering part of the proposed site for 110 dwellings but this has not yet been determined.

Site 5 – Land at Brinsford/Featherstone (465 Objections)

- 2.11 A considerable number of objections have been made to the proposed allocation of this mixed-use site on the grounds of the loss of Green Belt land and fundamental conflict with Green Belt policy; the development would completely destroy the rural character of Brinsford and Featherstone and would merge them into one large village with the loss of community identity; the proposals for 1000 houses is too many for the area; Featherstone has had enough development; the existing infrastructure is inadequate for the present needs of Featherstone village and could not accommodate the scale of additional development proposed; the local road system and transport network is inadequate to deal with the extra traffic generated by the proposed development and the park and ride facility; the development would have an adverse impact on wildlife and the local environment; brownfield and white land elsewhere should be used instead of Green Belt; the Council has failed to adopt the sequential

approach in PPG3; the proposed development would be adversely affected by noise and pollution from the M54 motorway; the development would provide overspill housing for the West Midlands; social/affordable housing would lead to an increase in crime and anti social behaviour and; property values would be affected. The majority of objectors consider that Council has failed to appreciate the impact that the proposal will have on the villages of Brinsford and Featherstone and the Green Belt.

- 2.12 There have also been objections to the proposal on the grounds that there are doubts about the timing and delivery of the railway station and park and ride site and that because of this uncertainty it is most unlikely that 1000 houses proposed would be built within the plan period. Other objections have been made on the grounds that Featherstone is not a sustainable location for development and that the proposal is contrary to national and strategic policy guidance. The owners and promoters of the site generally support the allocation but consider that the site is capable of accommodating more houses; there is potential for further development beyond the plan period; and that the site for the park and ride facility should be specifically identified in the Plan.

Site 6 – Land west of Watery Lane, Codsall (39 Objections)

- 2.13 Objections have been made to the allocation of this site on the grounds that the need for further development in Codsall is unproven; it is a large greenfield site and should be returned to Green Belt; the site has ecological value; development would be an incursion into an attractive area of countryside and have a detrimental effect on the character of this part of the village; development would have an impact on the setting of the church and conservation area; existing infrastructure will not be able to cope with additional housing development and; the proposal would lead to an increase in traffic and congestion. It has been suggested that the site should be used for community facilities such as a leisure facility rather than housing. It has also been suggested that the site should be extended to include additional land to the west and also that there are other more appropriate alternative sites in Codsall, Bilbrook and elsewhere.

Site 7 – Former Highway Depot, Walk Lane, Wombourne (0 Objections)

- 2.14 There have been no objections to the allocation of this site. The Council has approved an outline planning application for the development of the site for elderly persons accommodation.

3. Representations on the Employment Proposals

- 3.1 There have been some objections made to the regional and general employment proposals and objections have been made to the overall level of employment provision on the grounds that insufficient land has been identified for employment use and that additional sites should be allocated in the district. It has been suggested that additional employment sites should be allocated along the corridor of the M6 Toll Road and in other locations as part of other mixed-use developments. A number of additional employment sites have been suggested and these are included in a background document.

Regional Employment Sites (2 Objections)

- 3.2 Representations have been made in support of the Regional Investment and Major Investment sites at Wobaston Road, Pendeford and the Regional Investment Site at Hilton Cross but some objections have been raised concerning the office uses on these sites. Some objections have been made to the Wobaston Road sites on the grounds of possible impact of development on protected species and loss of playing fields.

General Employment Proposal Brinsford/Featherstone(2 Objections)

- 3.3 Objections have been made to the allocation of the site on the basis that the phasing of the proposal should not be linked to the housing development and that the area allocated for employment use should be identified and be restricted to the previously developed land at the former Royal Ordnance site allocated in the previous Local Plan.

4. Representations on Wolverhampton Airport Policy Area (10,770 Objections)

- 4.1 A considerable number of objections have been made to the policies and supporting text in the Green Belt section of the Plan relating to Wolverhampton Airport Policy Area and to an associated policy on air transport. The objections have principally been made on the grounds that the aspirations of the airfield owners have been comprehensively set out in the Local Plan; that the wording is unfairly beneficial to the airport and includes statements that are inaccurate and misleading. Objections have been made that the Plan should not prejudge the outcome of RPG or the Government White Paper on aviation and if the future objectives of the airport are to remain in the Plan that they should be set against well-reasoned justification on planning grounds.
- 4.2 Objections have been made on the grounds that new buildings should not be permitted at the airport; existing unused buildings should be used if necessary; and that the use of buildings for temporary (non-aviation) support uses that has continued for 26 years should cease. In addition, objections have been made that the Plan should include a clear definition of what level of activity constitutes a cessation of use of the site as an aerodrome and contain clear definitions of the aviation activities permitted at the site and the term “light aircraft”.
- 4.3 The view has been expressed that the policies in the Plan are unclear and open to different interpretation and that they should be more clearly defined to ensure that any development remains acceptable within the context of Green Belt policy and the principles of sustainable development. The vast majority of objectors are totally opposed to the future expansion of the airport on the grounds of the impact on the environment and that the local roads are inadequate to handle the level of traffic generated by such a major expansion.

5. Representations on other Policies and Proposals in the Plan

- 5.1 Representations have also been made on the other policies and proposals in the Deposit Plan. A brief summary of the representations made is given below.

Green Belt and Open Countryside

- 5.2 Representations have been made in support of the Council's overall Green Belt policy for the district but objections have been made to the identification of Green Belt land for development at Huntington, Brinsford/Featherstone and Cheslyn Hay. Objections have also been made to proposals to remove some existing areas of built development from the Green Belt on the grounds that it is contrary to Government guidance in PPG2 Green Belts. In addition, objections have also been made to Green Belt boundaries around some of the villages and these have been made by objectors in support of alternative sites that they wish to be allocated for development in the Plan or where they are seeking changes to boundaries to allow development.
- 5.3 The proposals for the provision of new cemetery sites at Wolverhampton Road, Cheslyn Hay and Sytch Lane, Wombourne have been supported but concern has been expressed that provision should be made in other areas of the district such as the Featherstone/Hilton/Shareshill/Saredon area. The Council has been requested to allocate additional land at Shareshill adjacent to the existing burial ground.
- 5.4 The objections made to policies for the Wolverhampton Airport Policy Area have been summarised in paragraphs 4.1 – 4.3 above.

Village Centres and Retailing

- 5.5 The representations on this section of the Plan cover the policies relating to retail uses in village centres and specific objections have been made that the Plan does not clearly define the role of village centres and does not differentiate between edge of centres and out of centre locations. In addition objections have been made that the Plan contains no proposals for new retail development in the district or for edge of centre/out of centre retailing. The view has been expressed that villages centres should retain their rural feel and that local facilities should be safeguarded.

Access and Movement

- 5.6 Representations have been made in support of the transport policies in the Plan particularly those covering sustainable modes of transport (buses, walking and cycling). Specific objections have been made on the grounds that the Plan does not contain a site-specific policy for the rail and bus based park and ride proposal at Brinsford and that the status of the proposal should be clarified. Objections have also been made that the requirement for a traffic impact assessment for large development sites and parking standards for new development are not consistent with national policy guidance.

Conservation and the Built Environment

- 5.7 The policies in this section of the Plan have generally been supported but some suggestions have been made to clarify and strengthen the policies relating to listed buildings and conservation areas and in some instances it has also been suggested that some of the policies could be usefully combined. Objections have been made to some of the policies including enabling development; the conversion of rural buildings; archaeological sites; design of new development; watercourses and telecommunications. The view has been expressed that some of the environmental

policies (water supply and drainage) duplicate controls that are the statutory responsibility of other bodies.

Open Space, Sport and Recreation and Tourism

- 5.8 The policies in this section of the Plan have generally been supported particularly those relating to open space provision, safeguarding of playing fields and allotments, countryside recreation and canals. The policies concerning the Bratch Policy Area at Wombourne and the Hatherton Branch Canal have been supported. Objections have been made to the Plan on the grounds that the policies should make reference to the historic environment; standards for natural green space should be included and that it is inappropriate to include the NPFA standards for open space provision. The view has been expressed that it is important that the Council carry out an audit of open space and recreation facilities as soon as possible to enable local standards to be established and sites for new facilities to be identified.

Landscape and Nature Conservation

- 5.9 The landscape and nature conservation policies in the Plan have generally been supported particularly those relating to the protection, retention and management of trees, hedgerows and woodlands including ancient woodlands and those covering the protection and enhancement of nature conservation sites, habitats and species. Objections have been made to the wording of some of the policies on the grounds that they could be improved and strengthened and that reference should be made to the historic environment. Specific objections have been made to the principle landscape policy on the grounds that it does not accord with the Structure Plan or the County Council's SPG on Planning for Landscape Change. Objections have also been made to the policy for historic landscape areas and in particular the identification of historic parks and gardens.

Implementation and Monitoring

- 5.10 Objections have been made to the policy on developer contributions on the grounds that it is not in accordance with Government guidance on planning obligations; that contributions should only be sought where they are justified; that contributions from developers will not necessarily be financial and; that there should be clear guidance for developers. Objections have also been made to the reference to supplementary planning guidance and to the indicators to be used for monitoring purposes.

Appendices

- 5.11 Objections have been made to Appendix 1 (Space about Dwellings), Appendix 2 (Car Parking Standards), Appendix 4 (Summary of NPFA Standards) and Appendix 6 (Sites of Nature Conservation Importance).

Proposals Map and Inset Plans

- 5.12 Objections have been made to the Plan seeking changes to the Proposals Map and Inset Plans and these have been made by objectors in support of alternative sites they wish to be allocated for housing or employment development in the Plan.

6. Summary

- 6.1 The main aim of the consultation on the Deposit Local Plan was to give the people of South Staffordshire and others the opportunity to comment on the Council's policies and proposals for the development of the district up to 2011. The overall response to the consultation has been unprecedented and the majority of the objections are focussed on the housing proposals, specifically Brinsford/Featherstone site, and the Council's policies for the Wolverhampton Airport Policy Area.
- 6.2 The level of interest in the Deposit Local Plan from local communities has been welcome and will give the Council a better understanding of the issues and concerns of local residents and will help to identify where changes or improvements are need to the spatial strategy and planning policies for the district and highlight other issues and opportunities that the development plan should address.