



South Staffordshire Council

Local Plan Review Consultation Response Form

Part A: Your Details (Please Print)		
Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.		
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The South Staffordshire Local Plan review **Spatial Housing Strategy & Infrastructure Delivery** document is being consulted on for a period of 8 weeks from Thursday 17 October until 5pm Thursday 12 December 2019. For advice on how to respond to the consultation form please email localplanreview@sstaffs.gov.uk or call 01902 696000.

Please note:

- Comments must be received by **5pm on Thursday 12 December 2019**. Late comments will not be duly made under the Regulations.
- Please fill in a separate Part B for each paragraph/table/topic you are commenting on
- Please explain your response where necessary

Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However your contact details will not be published.

Part B: Please complete a new Part B for each representation you wish to make.

Name: Sean Rooney

Organisation: HLPC on behalf of Folkes Holdings

- 1. Which part of the Local Plan review Spatial Housing Strategy and Infrastructure Delivery consultation does this representation relate to?**

Chapter	1 – Introduction
Paragraph	1.5
Table	
Question (if applicable)	
Other document eg SA, HRA	

- 2. Please set out your comments below**

Paragraph 1.5 advises the existing Local Plan (Core Strategy and SAD) looks forward to 2028 and includes a number of sites which are allocated but have not been developed yet. These allocations will be carried forward into the emerging Local Plan.

We consider that this approach is inappropriate, as there may be clear deliverability issues that have resulted in the allocated sites not coming forward for development during the plan period. Generally speaking, a site allocated in the local plan presents a promising development prospect, so if there has been no evidence that they will be delivered during the plan period, it often indicates that there are substantial constraints to development. If an allocated site has not come forward for development during the plan period, it should not automatically be considered more preferable for allocation in the emerging Local Plan than an alternative site, which may be more deliverable. The outstanding Local Plan allocations should be reviewed in order to establish if they are suitable for allocation in the emerging Local Plan, as part of the site selection process, as opposed to a blanket assumption that they are still appropriate and deliverable allocations that should be carried forward into the emerging Plan.

All comments should be made in writing preferably using this form and should be made no later than 5pm Thursday 12 December 2019

You can view the documents online at www.sstaffs.gov.uk/localplanreview

Contact:

Email the form to: localplanreview@sstaffs.gov.uk

Or send by post to: Strategic Planning Team, South Staffordshire Council, Council Offices, Wolverhampton Road, Codsall, South Staffordshire, WV8 1PX.

Part B: Please complete a new Part B for each representation you wish to make.

Name: Sean Rooney

Organisation: HLPC on behalf of Folkes Holdings

1. Which part of the Local Plan review Spatial Housing Strategy and Infrastructure Delivery consultation does this representation relate to?

Chapter	2 – The Local Plan Review Progress to Date
Paragraph	2.2
Table	
Question (if applicable)	
Other document eg SA, HRA	

2. Please set out your comments below

Paragraph 2.2 of the Spatial Housing Strategy & Infrastructure Delivery consultation document acknowledges that South Staffordshire will have a role to play in helping to meet the unmet housing needs in the wider housing market area. We have provided more detailed comments on this matter in our representations to paragraphs 2.3 and 2.4 regarding the Preferred Housing Target. It is suggested that a 4,000 dwelling contribution should be made to help meet the growth requirements of Birmingham and the Black Country HMA. However, paragraph 2.2 further states that if it is evident the extent of the housing shortfall has significantly reduced prior to the Local Plan review Submission, the Council will reduce its contribution to the unmet needs proportionally.

We disagree with this statement within paragraph 2.2 as it assumes that the evidence base underpinning the extent of the housing shortfall could only result in the shortfall decreasing, as opposed to increasing. It is our view the 4,000 dwelling contribution suggested by the emerging Local Plan is wholly inadequate. In any event, it is entirely possible the contribution could go up, as well as down, as evidence-based documents are produced. It is inappropriate for it to be assumed that any future evidence can only support a downward adjustment to the housing requirement. It is therefore suggested that this text is removed or amended to reflect the fact that emerging evidence could result in the housing requirement both increasing, as well as decreasing.

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Part B: Please complete a new Part B for each representation you wish to make.

Name: Sean Rooney

Organisation: HLPC on behalf of Folkes Holdings

1. Which part of the Local Plan review Spatial Housing Strategy and Infrastructure Delivery consultation does this representation relate to?

Chapter	2 – The Local Plan Review Progress to Date
Paragraph	2.3 and 2.4
Table	
Question (if applicable)	
Other document eg SA, HRA	

2. Please set out your comments below

We support the use of the Standard Method as the starting point in establishing the South Staffordshire proportion of the emerging Local Plan's housing requirement. It should however be noted that the Standard Method is under review. If the Standard Method is amended during the course of the Plan preparation process it may be necessary to recalculate South Staffordshire's proportion of the Local Plan's housing requirement based upon the revised methodology. This matter should be kept under review.

The NPPF advises that the Standard Method should be the starting point for establishing the minimum number of homes needed in an area. The Standard Method figure included in the plan is, therefore, the absolute minimum number of dwellings that should be provided to meet the South Staffordshire element of the housing requirement. That being the case, as drafted, the emerging plan contains the minimum number of housing required to meet the growth requirements of South Staffordshire.

In addition, the NPPF advises at paragraph 60 that the Standard Method housing requirement should be used, unless exceptional circumstances justify an alternative approach, which also reflects future demographic trends and market signals. The Council should, therefore, establish whether exceptional circumstances exist to support the housing requirement being increased accordingly. Such factors could include the need to increase the housing requirement in order to assist with affordable housing delivery or the economic growth of the district. There is no information included in the consultation plan explaining how these factors have been considered and tested in order to establish whether exceptional circumstances apply in this instance. This is an omission which should be addressed.

Paragraph 60 of the NPPF also advises that in addition to the Local Housing Needs figure, any need that cannot be met within neighbouring authorities should be taken into account in establishing the amount of housing to be planned for. The consultation draft plan suggests a 4,000 dwelling contribution should be made toward meeting the growth

requirements of the HMA. It is our view the emerging Local Plan should make a significantly greater contribution than that currently identified for the following reasons:

- The HMA housing shortfall arises from the inability of Birmingham and the Black Country to meet their own housing growth requirements. The Birmingham Development Plan was adopted in January 2019. Policy PG1 – Overall Levels of Growth, advises Birmingham's objectively assessed housing needs figure for the period 2011-31 is 89,000 dwellings (the equivalent of 4,450 dpa). This level of housing development cannot be accommodated within the City's administrative area. The Birmingham Development Plan has therefore been prepared on the basis of the delivery of 51,000 dwellings within the plan area, with the shortfall of 37,900 dwellings to be delivered in neighbouring authority areas through the Duty to Cooperate.
- Since the adoption of the Birmingham Development Plan, Birmingham City Council has produced a new Strategic Housing Land Availability Assessment 2018 (SHLAA) this document suggests sites within the urban area of Birmingham can deliver a total of 61,403 dwellings during the course of the plan period. This supply consists of 14,047 completions between 2011/12 and 2017/18. The remaining 47,356 dwellings can be delivered on sites that are either allocated for development by the Birmingham Development Plan, have planning permission, or are identified as potentially being suitable for development by the SHLAA.
- It cannot however be assumed that all SHLAA sites will come forward. The SHLAA confirms at paragraph 2.2 that the inclusion of a site in the SHLAA does not mean it will be developed for housing, it does not mean housing is the only suitable use for the site and it does not necessarily mean, where it is not already the case, planning permission will be granted for housing. Circumstances may change over time.
- The SHLAA is not an allocations document. It has not been the subject of examination or independent testing in the same way the capacity figures in the Birmingham Development Plan policy PG1 have been. In addition, there is no suggestion by the City Council that we are aware of policy PG1 is of an out of date policy, or the residual housing shortfall identified should not be planned for by other authorities in the plan area. That being the case, the fact the most recent Birmingham SHLAA indicates there is additional residential capacity in Birmingham does not change the extent of the shortfall which should be planned for to meet the growth requirements of Birmingham identified by policy PG1. The starting point is the 37,900 shortfall figure identified by Policy PG1.
- Furthermore, if the SHLAA is to be treated as new and relevant evidence, other material considerations that have arisen since the adoption of the Birmingham Development Plan should also be taken into account in establishing the extent of the shortfall. This includes the Standard Method, which can be used to establish a new housing requirement for Birmingham. As referred to above, the adopted Birmingham development plan includes a housing requirement equivalent to 4,550 dwellings per annum. However, the Standard Method housing requirement for Birmingham City is 4,975 dwellings. The Standard Method housing requirement for Birmingham,

increases the overall housing requirement for the city by 8,500 dwellings, compared to that included within the Birmingham Development Plan.

- In addition, the Birmingham Development Plan period runs to 2031. The extent of the housing shortfall in Birmingham, referred to by policy PG1, also only extends to 2031. The emerging South Staffordshire plan is being prepared to have an end date of 2037. The Birmingham Development Plan will be reviewed in due course and the plan period extended accordingly. All evidence currently suggests Birmingham City Council will remain unable to meet its housing requirement in subsequent versions of the Local Plan review beyond 2031. However, no provision is being made within the emerging South Staffordshire Local Plan for any shortfall which could arise from Birmingham in the period beyond 2031 to 2037. Birmingham City Council will inevitably have to ask neighbouring authorities, including South Staffordshire, to make a contribution in their replacement Local Plans to meet the growth of Birmingham beyond 2031. If South Staffordshire fails to make an appropriate contribution toward the unmet housing requirements of the conurbation emerging through the Birmingham Local Plan review process it could result in the emerging South Staffordshire plan being found either unsound or requiring significant amendments to accommodate additional development requirements. That being the case, it is essential the emerging South Staffordshire Plan includes appropriate provision for meeting a proportion of Birmingham's housing shortfall.
- The Black Country authorities are also in a position of relying upon other authorities within the HMA to deliver a significant amount of housing to help meet their growth requirements. The Black Country Core Strategy ("**BCCS**") is in the process of being replaced by the Black Country Plan. The Issues and Options consultation was undertaken on the emerging replacement Plan in July and September 2017. The consultation document advised 78,000 dwellings are required between 2014 and 2036 in order to meet the growth requirements of the Black Country (3,545 dpa). However, this figure will need to be revised upwards in subsequent versions of the plan.
- The Issues and Options consultation document was published before the revisions to the PPG that required the application of the 2014 household projections in the Standard Method calculation. If the updated guidance on the Standard Method calculation is used, it results in a housing requirement of 3,761 dwelling for the Black Country.
- The Issues and Options consultation Black Country plan advises it is estimated sites within the urban area could deliver 56,000 dwellings. However, in order to achieve this, all sites currently being built out and all sites with planning permission will need to be delivered as expected and all of the other sites will need to come forward with increased densities. This leaves a shortfall of approximately 22,000 dwellings needing to be provided outside of the urban area. This shortfall will need to be accommodated on land within the Green Belt within the Black Country and neighbouring authorities. However, Green Belt development opportunities within the Black Country are highly limited. In addition, it is highly unlikely all identified SHLAA sites will be found to be deliverable, or capable of allocation, and the density assumptions within the Black Country Plan are extremely ambitious. The 22,000

dwelling shortfall identified therefore represents a robust, conservative starting point for understanding the combined housing shortfall of the conurbation.

- The total shortfall identified by policy PG1 of the Birmingham Development Plan and the Issues and Options consultation draft replacement Black Country Plan, is 55,800 dwellings. This figure should be used as a starting point for the distribution of the shortfall amongst the authorities within the HMA.
- To date there has been highly limited progress with the authorities within the HMA in the preparation of Local Plans to assist in meeting the unmet growth requirements of the conurbation. The position can be summarised as follows:
 - i. Lichfield District – The Preferred Options consultation version of the Lichfield District Local Plan suggests Lichfield District could make a contribution of 4,500 dwellings to meet the requirements of the conurbation.
 - ii. North Warwickshire Borough – The North Warwickshire Local Plan is currently the subject of examination. It makes reference to testing the potential to deliver 3,790 dwellings to meet the needs of the conurbation. However, the Local Plan Inspector has noted a significant proportion of the housing requirement is dependent upon infrastructure which is the subject of an undetermined Housing Infrastructure Funding bid for £58m. Until the outcome of the HIF bid is known, there is some uncertainty regarding whether the allocations are deliverable.
 - iii. Solihull MBC – The emerging Solihull Local Plan makes reference to the Council “testing” the provision of 2,000 dwellings to meet the growth requirements of the conurbation.
 - iv. Redditch Borough – Due to a lack of urban capacity the current Redditch Local Plan (2017) relies upon the Bromsgrove Local Plan in meeting a significant proportion of its housing requirement. It is highly unlikely any significant new urban capacity will be found in future versions of the Redditch Local Plan. As such, Redditch Borough will not make any contribution toward meeting the growth requirements of the conurbation.
 - v. Tamworth – The most recent Tamworth Local Plan was adopted in 2016. Due to a lack of urban capacity the Local Plan relies on the Lichfield District and the North Warwickshire Local Plans in meeting a significant proportion of the Borough's housing requirement. It is highly unlikely any new significant urban capacity will be found in future versions of the Plan and as such, Tamworth will not play any role in meeting the growth requirements of the conurbation.
 - vi. Cannock Chase District – Cannock Chase District is currently in the process of preparing a replacement Local Plan, the Issues and Options document (May-June 2019) acknowledges the district will need to play a role in helping to meet the unmet housing requirements of the conurbation. No contribution figure is identified. However, there are various constraints to development in Cannock Chase, including the Cannock Chase AONB, the Cannock Chase SAC and the Green Belt. This therefore limits the ability of Cannock Chase to accommodate significant new development.

vii. Stratford on Avon – Only part of Stratford on Avon District is within the HMA. Work on a replacement plan is due to be scheduled next year. Whilst the replacement plan potential will need to assist in meeting the growth requirements of the conurbation any contribution is not known.

viii. Bromsgrove District – The Bromsgrove District Plan Review Update Further Consultation document was produced in September 2019. Whilst the consultation document acknowledges Bromsgrove District will have to play a role in helping to meet the growth requirements of the conurbation no housing contribution figure is provided.

In summary, Lichfield, North Warwickshire and Solihull are preparing Local Plans which, between them, make a maximum contribution of 10,290 dwellings toward the housing shortfall. Redditch and Tamworth are unable to make any contribution to the shortfall. That being the case, Bromsgrove District, Cannock Chase, Stratford on Avon and South Staffordshire will need to make significant contributions to addressing the remaining 45,510 dwelling shortfall.

On this basis, the 4,000 dwelling figure is, in our view, inadequate. It is less than 10% of the overall housing shortfall. Given the strong functional relationship between South Staffordshire and the Black Country it is our view the minimum contribution in the South Staffordshire plan toward the housing shortfall should be 10,000 dwellings, which will still leave in excess of 35,000 to be delivered amongst the remaining HMA authorities.

It is also our view that the emerging plan should include a buffer to allow for allocations not delivering as expected. It is not uncommon for Local Plan allocations not to come forward. This could be for a variety of reasons, including a change in land owners' aspirations, detailed technical work reducing the capacity of sites, or changes to the housing market. Given South Staffordshire is a predominantly Green Belt authority if allocations do not deliver, this will cause significant problems with housing delivery as there are few non-Green Belt alternative sites which could come forward for development in order to ensure continuity in supply. It is therefore our view a 20%-25% buffer should be added to the housing requirement, in order to take account of non-delivery. This is the approach adopted by Lichfield District, as identified in the consultation draft Preferred Options Local Plan Committee Report, which refers to a requirement for a 20%-25% buffer to take account of non-delivery. Whilst a significant proportion of Lichfield District is within the Green Belt, the northern section of the District is within the open countryside and that being the case Lichfield District is less constrained than South Staffordshire in terms of alternative development locations. The use of a 20%-25% buffer is therefore in our view entirely appropriate in this instance.

Based on a standard method housing requirement for South Staffordshire of 4,845 dwellings and a 10,000 unit allocation in order to assist in meeting the growth requirement of the conurbation, a total of 14,854 dwellings should be provided in the emerging plan before a buffer is added. This increases to 17,825 with a 20% buffer and 18,568 dwellings with a 25% buffer.

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Part B: Please complete a new Part B for each representation you wish to make.

Name: Sean Rooney

Organisation: HLPC on behalf of Folkes Holdings

1. Which part of the Local Plan review Spatial Housing Strategy and Infrastructure Delivery consultation does this representation relate to?

Chapter	2 – The Local Plan Review Progress to Date
Paragraph	2.10
Table	
Question (if applicable)	
Other document eg SA, HRA	

2. Please set out your comments below

This section looks at the purpose of the consultation and outlines how the spatial options have been devised. We agree with paragraph 2.6 which states that the district is unlikely to meet its housing requirement through just one spatial approach. Green Belt release will require a planning balance of Green Belt Function; availability; deliverability; and sustainability weighed against the potential benefits. We have a number of concerns with the Spatial Options used to inform the preferred direction for growth and these are set-out below:

- Maximising open countryside release – the majority of South Staffordshire district is within the Green Belt. Only the northernmost section of the district is within the open countryside. The vast majority of the largest settlements within South Staffordshire are located within the Green Belt and the Green Belt in our view wraps around the built-up edge of the conurbation. Whilst opportunities to deliver housing in the open countryside should be explored, the benefits of doing so should be weighed against Green Belt land release and the exceptional circumstances required in order to release land from the Green Belt through the plan-making process, in accordance with the requirements of the NPPF. Exceptional circumstances could include the need to deliver housing in close proximity of the areas where the need arises from, the need to ensure suitable access to services, facilities and job opportunities and reducing the need to travel. It is therefore our view it is inappropriate for the plan to suggest it should '*maximise*' countryside release as this is a matter for the planning balance.
- Prioritising Green Belt land release in areas of lesser Green Belt harm – Green Belt land release in the emerging plan is inevitable. However, a range of factors should be considered when assessing which sites to be released from the Green Belt. The level of harm to the Green Belt is one such consideration, however this should be considered alongside other planning factors. This includes the deliverability of sites, the access of sites to services and facilities and the wider benefits they can deliver, in terms of public open space, affordable housing and community facilities. It will also

be necessary to consider the accessibility of sites to services, facilities, job opportunities and public transport opportunities as part of a site selection process.

- Carrying forward existing core strategy approach to distribution – it is inappropriate to carry forward the existing core strategy's strategic approach to distribution. The adopted core strategy was prepared to deliver a significantly reduced housing requirement in the context of the guidance of the former West Midlands Regional Spatial Strategy. The emerging plan will have a significantly higher housing requirement, influenced by the fact South Staffordshire will have to play an important role in helping to meet the unmet housing requirements of the conurbation. The strategic approach distribution of the plan will need to reflect this and ensure development is distributed in such a way that the overflow element of the housing requirement is located in areas easily accessible to the wider HMA.
- Maximising sites and areas identified in the GBHMA Strategic Growth Study – this approach is inappropriate as the Strategic Growth Study is an out of date document.
- In addition, the Strategic Growth Study advises at paragraph 1.38 that, given the scale of the unmet need and the strategic nature of the study, it focuses on considering strategic development options for addressing the housing need shortfall, in terms of considering the Areas of Search, which could potentially support developments of 1,500 dwellings plus. The Strategic Growth Study does not consider development options of below 1,500 and that being the case, the findings of the study will only be relevant to any sites being considered for development at a minimum of 1,500 dwellings. If urban extensions are proposed that are smaller than this, the Strategic Growth Study is not a relevant evidence-based document.
- Giving first consideration to Green Belt land, which was previously developed or well served by public transport – The fact Green Belt land was previously developed or well served by public transport is a clear material consideration in the site assessment process. However, there remain other factors that need to be considered including the presence, or ability, to create strong defensible Green Belt boundaries, the deliverability of sites, access to services and facilities and the wider opportunities available through the allocation of specific sites, such as the provision of public open space and affordable housing.
- Infrastructure-led development with a garden village area of search beyond the plan period – It is not clear what this will achieve as it will increase travel distances and delivery can be very long term and would not meet the immediate requirements of the district and the HMA.

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Part B: Please complete a new Part B for each representation you wish to make.

Name: Sean Rooney

Organisation: HLPC on behalf of Folkes Holdings

1. Which part of the Local Plan review Spatial Housing Strategy and Infrastructure Delivery consultation does this representation relate to?

Chapter	3 – Evidence used to inform spatial housing options
Paragraph	3.8
Table	
Question (if applicable)	1
Other document eg SA, HRA	

2. Please set out your comments below

Whilst we consider that some of the evidence base used to inform the Spatial Housing Options can be useful in guiding the location development, we do not consider that it is entirely robust and proportionate.

Paragraph 3.8 refers to the Greater Birmingham Housing Market Area Strategic Growth Study, which we consider should no longer be considered a relevant evidence-based document. The Study was prepared prior to the requirements of the NPPF to use the Standard Method to establish housing requirements, unless exceptional circumstances justify an alternative approach. Therefore, the extent of the shortfall identified by the Study is out of date. Furthermore, it outlines within the Study that it not a SHMA which includes an objectively assessed housing needs figure.

In addition, the capacity figures for the individual authorities within the Study area are out of date and are placed on a series of contested assumptions. The Study also confirms at paragraph 1.38 that, given the scale of the unmet need and the strategic nature of the Study, the focus is on strategic development options, supporting development of 1,500 or more. It does not consider the opportunities of any development below that size and, that being the case, its findings are only a relevant consideration for development options of 1,500 dwellings or more.

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Part B: Please complete a new Part B for each representation you wish to make.

Name: Sean Rooney

Organisation: HLPC on behalf of Folkes Holdings

- 1. Which part of the Local Plan review Spatial Housing Strategy and Infrastructure Delivery consultation does this representation relate to?**

Chapter	4 – The Spatial Housing Options under consideration
Paragraph	
Table	
Question (if applicable)	3
Other document eg SA, HRA	

- 2. Please set out your comments below**

We do not agree all Safeguarded Land identified by the SAD should be released as a priority. The suitability of Safeguarded Land for allocation should be considered alongside all other alternative development options. There are a range of factors that should affect the site selection process, including access of sites to services and facilities, their deliverability and the wider benefits which arise from allocation, including the delivery of public open space and other community facilities. It should not automatically be assumed that Safeguarded Land options are more suitable for allocation than other sites. It is also our view that it is inappropriate to assume all Safeguarded sites are capable of delivering at 35 dwellings per hectare. In the first instance, it should be confirmed that whatever density assumptions are used should be on a net basis.

Furthermore, the majority of the Safeguarded Land is undeveloped greenfield land adjacent to existing settlements and as such are considered rural fringe locations. It is therefore suggested a maximum density assumption which should be applied to these sites is 30dph net. If a greater quantum of housing can be achieved on Safeguarded Land then this will be beneficial and will help the supply of housing land in South Staffordshire in accordance with the requirements of the NPPF. However, by adopting the lower density figure it builds in a degree of flexibility into the plan because, if sites on Safeguarded Land do not deliver at 35dph, then a housing shortfall could arise.

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Name: Sean Rooney

Organisation: HLPC on behalf of Folkes Holdings

1. Which part of the Local Plan review Spatial Housing Strategy and Infrastructure Delivery consultation does this representation relate to?

Chapter	5 - Conclusions on the spatial housing options
Paragraph	
Table	
Question (if applicable)	6
Other document eg SA, HRA	

2. Please set out your comments below

We are in general support of the Spatial Housing Option, albeit subject to a number of provisions. As detailed in our representation to the 'Preferred housing target for the local plan review', the emerging plan should have its housing requirement significantly increased, to take account of a greater proportion of the unmet housing requirement from the conurbation, in order to include a buffer. It is our view that the majority of the increased housing requirement should be directed toward the edge of the conurbation, particularly the western boundary of the Black Country, close to where the need for development arises.

We support recognition within Option G that sites providing the opportunity to deliver strategic infrastructure should be supported. This includes infrastructure such as the provision of public open space, which can be achieved with largescale residential developments. As such, preference should be given to potential development sites where there is commitment to delivering significant areas of open space to the benefit of the local community.

We do not agree that all sites that are considered to be in areas of 'very high' harm Green Belt should be discounted as often these categorisations are blanket assumptions made over large swathes of land, as opposed to considering the merits of individual sites. As detailed within the Vision Document accompanying these representations, if the parcel of land being promoted for allocation is considered against the Green Belt purposes in isolation, it performs a significantly reduced role.

On this matter, we disagree with the suggestion that a greater quantum of residential development should be directed toward the northern boundary of the Black Country, as opposed to the western edge. There are substantially fewer opportunities to accommodate development adjacent the northern edge of the Black Country, given there is less land available.

Part B: Please complete a new Part B for each representation you wish to make.

Name: Sean Rooney

Organisation: HLPC on behalf of Folkes Holdings

- 1. Which part of the Local Plan review Spatial Housing Strategy and Infrastructure Delivery consultation does this representation relate to?**

Chapter	5 Conclusions on the spatial housing options
Paragraph	
Table	
Question (if applicable)	7
Other document eg SA, HRA	

- 2. Please set out your comments below**

Whilst we do not oppose the emerging plan-making reference to the opportunity for a new settlement in future versions of the local plan, it must be clear that a new settlement option is not considered to be realistic for the emerging Local Plan. New settlements take a significant amount of time to deliver. They require significant new infrastructure, land assembly and complex delivery mechanisms.

Any new settlement would be unable to deliver for a significant period of time and therefore it is appropriate for the emerging local plan to identify it as a potential option for the next Local Plan review, but it is not a realistic opportunity for delivery within the plan period of the emerging Local Plan.

Furthermore, housing delivery is required in South Staffordshire promptly and the most appropriate way of delivering this is to direct development toward a series of urban extensions in sustainable locations, which can deliver development promptly. This should form the main part of the preferred strategy for the emerging Local Plan.

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Name: Sean Rooney

Organisation: HLPC on behalf of Folkes Holdings

- 1. Which part of the Local Plan review Spatial Housing Strategy and Infrastructure Delivery consultation does this representation relate to?**

Chapter	5 Conclusions on the spatial housing options
Paragraph	
Table	
Question (if applicable)	8
Other document eg SA, HRA	

- 2. Please set out your comments below**

We do not consider that any further evidence is required before concluding that Green Belt land release is justified. The adopted Core Strategy and Site Allocations Document have been found to be sound through the examination process. These documents require Green Belt land release in order to meet the Core Strategy housing requirement. Given the emerging Local Plan will have a housing requirement significantly in excess of that included in the Core Strategy and no new urban capacity of note is being identified, it is unfeasible that the emerging housing requirement can be met without Green Belt land release.

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Organisation: HLPC on behalf of Folkes Holdings

1. Which part of the Local Plan review Spatial Housing Strategy and Infrastructure Delivery consultation does this representation relate to?

Chapter	5 Conclusions on the spatial housing options
Paragraph	
Table	
Question (if applicable)	9
Other document eg SA, HRA	

2. Please set out your comments below

We have a number of comments on the Site Selection Methodology for the Preferred Options consultation document set-out in appendix 6 of the consultation document and these are summarised below:

- We support the use of the Council's SHELAA as a starting point for identifying potential sites for allocation. However, the information in the SHELAA must be supplemented by site-specific information in order to fully understand the opportunities which are available. Our representations are accompanied by a Vision Document which confirms the development opportunity presented by land at Lawnswood. This document should be referred to for a detailed explanation of how it is envisaged this site can be delivered and the benefits that will occur as a consequence of its allocation.
- Paragraph 1.7 advises the minimum site search threshold used will be 0.28 hectares, which is considered to be of a minimum site size likely to deliver a scheme of 10 dwellings more to a density of 35 dwellings per hectare. This is on the basis the minimum allocation will be 10 units. This approach is incorrect – a site of 0.28 hectares will only deliver 35 dwellings at a gross density. The density figures used for the area calculation should be net figures, incorporating an allowance for public open space and on-site infrastructure. As a consequence, this matter needs to be reassessed. Given the assumptions made in paragraph 1.7, it should be ensured all density assumptions used within the emerging plan to calculate potential capacity are net rather than gross density assumptions.
- We support the recognition that the ability of sites to support the delivery of infrastructure should be a consideration in the site selection process. Folkes Holdings land at Lawnswood presents the opportunity to provide infrastructure, particularly green infrastructure, flood alleviation measures, highways improvements and new pedestrian and cycling routes in addition to community / education facilities.
- We support the recognition in paragraph 3.4 that, just because a site is outside of the Green Belt, does not automatically mean it will be considered more favourably than Green Belt site options. Clearly, guidance in the NPPF prioritises the development of

non-Green Belt site before greenbelt land. However, there are a variety of factors that need to be considered in the site selection process, including access to services and facilities, landscape, ecological and other environmental constraints, deliverability and suitability generally.

- It is agreed the level of Green Belt harm is a consideration in the identification of potential development opportunities in the Green Belt. Whilst the Green Belt Study 2019 should be the starting point for assessing the Green Belt harm, the assessed parcels may not match the sites being promoted for development. This is the case with the land at Lawnswood which is being promoted for development by Folkes Holdings. As detailed in the Vision Document accompanying these representations, if the site is assessed in isolation of the much larger parcel, it performs a limited Green Belt role and any harm caused by development in this location will be moderate. It is therefore our view that it is essential that the Green Belt site in this potential location is considered, having regard to the extent of the proposed allocation, as opposed to simply relying on the findings of the Green Belt Study.
- It is agreed that landscape sensitivity is also an important consideration. The Council's Landscape Sensitivity Assessment 2019 is an important evidence-based document in this regard. However, it must be ensured that the landscape sensitivities of potential location sites are considered having regard to the extent of the site being promoted for development, as opposed to the conclusions against the much larger parcels including within the Landscape Sensitivity study. The Vision Document accompanying these representations demonstrates the land at Lawnswood is appropriate for development from a landscape sensitivity perspective.

All comments should be made in writing preferably using this form and should be made no later than 5pm Thursday 12 December 2019

You can view the documents online at www.sstaffs.gov.uk/localplanreview

Contact:

Email the form to: localplanreview@sstaffs.gov.uk

Or send by post to: Strategic Planning Team, South Staffordshire Council, Council Offices, Wolverhampton Road, Codsall, South Staffordshire, WV8 1PX.

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Part B: Please complete a new Part B for each representation you wish to make.

Name: Sean Rooney

Organisation: HLPC on behalf of Folkes Holdings

1. Which part of the Local Plan review Spatial Housing Strategy and Infrastructure Delivery consultation does this representation relate to?

Chapter	5 Conclusions on the spatial housing options
Paragraph	
Table	
Question (if applicable)	10
Other document eg SA, HRA	

2. Please set out your comments below

We do not agree that all sites that are considered to be in areas of 'very high' harm Green Belt should be discounted as often these categorisations make blanket assumptions over large swathes of land, as opposed to considering the merits of individual sites. As detailed within the Vision Document accompanying these representations, if the parcel of land being promoted for allocation is considered against the Green Belt purposes in isolation, it performs a significantly reduced role.

Green Belt release will require a planning balance of Green Belt Function; availability; deliverability; and sustainability weighed against the potential benefits. Exceptional circumstances will be required to release the land from the Green Belt in accordance with the requirements of the NPPF, regardless of the level of harm. Some Green Belt land considered 'very high' harm may be in close proximity to areas of greatest housing need, have suitable access to services, facilities and job opportunities and be generally better suited to development than other lower harm Green Belt areas.

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