



South Staffordshire Local Plan: Site Allocations Document: The Publication Plan

Representations on behalf of The Wyrley Estate

INTRODUCTION

These representations have been prepared by Fisher German on behalf of The Wyrley Estate (hereafter referred to as my client) in respect of South Staffordshire Council's Regulation 19 Consultation on the Local Plan Site Allocations Document (SAD) Development Plan Document (DPD). It seeks to address only those issues of relevance to my client's interests and incorporates representations on the SAD DPD with reference to other supporting evidence, including the South Staffordshire Partial Green Belt Review Method Statement (November 2016).

My client owns land to the south of Holly Lane, in the Landywood village area adjacent to Great Wyrley. The sites are located either side of the local railway line between Birmingham and Rugeley. The sites extend to approximately 6.1 hectares in total combined area, and a plan showing the site's boundaries is enclosed with these representations.

Having regard to the South Staffordshire Local Plan policy position and housing requirements, as will be demonstrated in these representations South Staffordshire Council need to take a robust approach to ensuring that a flexible and deliverable supply of housing can be brought forward. This is particularly evident in the settlements of Cheslyn Hay and Great Wyrley.

Given the constraints currently imposed on the authority area, we strongly support the review of the Green Belt being undertaken, which is the only way in which development needs can be met whilst ensuring that enduring, defensible boundaries can be created and maintained.

SOUTH STAFFORDSHIRE LOCAL PLAN PART TWO: SITE ALLOCATIONS DOCUMENT - PUBLICATION PLAN

Housing Need

South Staffordshire Council has challenging housing targets to deliver and, in accordance with the National Planning Policy Framework (NPPF), the Local Plan Part Two must ensure that it is capable of delivering the housing needs identified in the Core Strategy. However, local planning policy as a whole must reflect the most recent evidence base and ensure that there is sufficient flexibility to demonstrate a five-year supply of deliverable housing land, ensuring competition and choice in the market for this land.

The Local Plan is targeted to deliver a minimum of 3,850 dwellings over the period 2006 to 2028. The Spatial Strategy for South Staffordshire, set in Core Policy 1 of the Core Strategy Development Plan Document (DPD) seeks to focus development around nine main service villages, of which Cheslyn Hay and Great Wyrley are two. Both Cheslyn Hay and Great Wyrley are the main service villages in 'Locality Area 3', where Core Policy 6 states there is a minimum housing requirement of 226 dwellings (14% of the overall housing requirement) over the plan period.

The current consultation on the SAD Publication Plan has taken into consideration a review of the original housing requirement through the previous consultation stages on the SAD. This includes adjustments based around changes to the housing land supply. The SAD states in paragraph 7.7 that the minimum residual number of new homes to be delivered in Great Wyrley is now 87 dwellings, with 63 dwellings needed in Cheslyn Hay.

The housing requirement figure Great Wyrley is an increase from the original Core Policy 6 position, suggesting an under delivery during the Plan period so far. It is clear that South Staffordshire Borough Council now needs to take a robust approach to ensuring that a flexible and deliverable supply of housing can be brought forward. Consequently, further sources of supply must be identified.

Adding to this urgency is the requirement to undertake a review of the existing Local Plan, under the Duty to Cooperate. This has arisen since the Core Strategy adoption in 2012 due to significant cross-boundary issues.

Given the immediate and pressing need for delivery of housing in the Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP) area, confirmed during the examination of the Birmingham Development Plan, significant emphasis should be placed on meeting existing needs for the housing market area, and ensuring sufficient allowance for longer-term needs.

The Council's Site Allocations Document (SAD) provides an opportunity to ensure that the most recent evidence on housing needs can be taken into account, with the Green Belt Review enabling the release of land to meet these needs now, whilst also identifying suitable parcels of land to be released from the Green Belt and safeguarded to meet longer term needs.

Such an approach would comply with the requirements of the National Planning Policy Framework (NPPF), which states that local planning authorities should ensure that local plans

are based on an adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. When seeking to alter existing Green Belt Boundaries, it is therefore clear that a review of all potential sites to be released should be undertaken, based on a clear, objective methodology.

That being the case, it is imperative that South Staffordshire Council takes a robust approach to allocating sufficient sites to maintain a five-year housing land supply, in order to maintain a proactive approach to directing development, including protection of the Green Belt. Given the constraints currently imposed on the Council, we strongly support the review of the Green Belt being undertaken, which is the only way in which development needs can be met whilst ensuring that enduring, defensible boundaries can be created and maintained.

Proposed Site Allocations

In light of the above discussion regarding the housing need and supply in South Staffordshire, with specific reference to Great Wyrley and the increased housing needs, it is clear that a broader approach must be adopted to delivering housing in sustainable settlements.

Great Wyrley has, along with Cheslyn Hay, been confirmed as a sustainable settlement, and consideration must therefore be given to allocating sites for housing.

The SAD Publication Plan sets out under Policy SAD2 a list of residual housing site allocations. The accompanying Policy SAD3 lists safeguarded land for longer term development needs, to contribute towards meeting the Core Strategy Policy GB2 requirement for 10 years' housing land supply, or 1,750 dwellings in total. This land would be removed from the Green Belt and would retain its safeguarded land designation until a review of the Local Plan proposes development of those areas in whole or part.

Several sites in and around Cheslyn Hay and Great Wyrley are proposed for housing in the SAD Publication Plan. It is clear however that additional sites are required to maintain flexibility in the supply situation (and important factor given the identified shortfalls in recent years around Great Wyrley) and contribute towards the wider housing market area's needs.

Additional Suitable Site Allocations

In terms of identifying suitable sites, enclosed with these representations are a site location plan in relation to my client's lands at Landywood, south of Holly Lane. One site is located to the west of the railway line and north of Landywood Farm. Another site is located east of the railway line and west of the Primary School. Both sites represent deliverable options for housing at Cheslyn Hay and Great Wyrley. Detailed justification for the site is set out in the appendix to these representations, where we have assessed the site against the requirements of the Local Plan's site assessment methodology as set out in the Site Assessment and Discounted Sites Paper (January 2017).

This land, along with several other sites located in and around Cheslyn Hay and Great Wyrley, is currently located within the Green Belt. However, having regard to the five functions of the Green Belt as set out in paragraph 80 of the NPPF, it is considered that this land could be released from the Green Belt without any harm to its wider functions.

The release of this land now will enable the housing market area's needs to be met. However, even if it considered that this site is not required to meet needs within the current plan period, it should nevertheless be released to assist in meeting longer-term needs, and be subject to an appropriate safeguarding policy. This approach is in accordance with the Framework's requirement for Green Belt boundaries to be enduring and, following review, not require amending at the end of the current plan period. Given the requirement in the Local Plan Strategy document for an early review if additional housing need is identified, taking this approach to safeguarding land will allow South Staffordshire the flexibility it requires without requiring further review of Green Belt Boundaries.

South Staffordshire Partial Green Belt Review (November 2016)

We support the principle of altering Green Belt boundaries to reflect existing and committed development, following logical boundaries, but emphasise the need for additional allocations to be made across the full range of sustainable settlements, including Cheslyn Hay and Great Wyrley.

The South Staffordshire Partial Green Belt Review (November 2016) states in paragraph 3.7 that:

"The area of the parcels around settlements was guided by the housing requirement of each settlement up to 2028 as set out in Core Policy 6, plus possible safeguarded land requirements, as provided by SSDC."

The accompanying table 3.1 lists the housing numbers as per Policy CP6, possible safeguarded land area figures, and estimated land areas required for each settlement. The evidence fails to take into account the adjusted housing figures since Policy CP6 was implemented in 2012. In Great Wyrley for example, there has been a 55% increase in the minimum housing requirement. To base an assessment of Green Belt parcels on a significantly lower housing figure is a risk to the overall plan's soundness. The areas are not justified in that case because they have been guided by a much lower housing figure.

The overall extent of the area of search was also guided by an appropriate housing density consistent with the District's Strategic Housing Land Availability Assessment (SHLAA), which assumes an average density of 25 dwellings per hectare. A blue box representing the approximate total area of allocated and safeguarded land required around each settlement is located in the top left hand corner of each settlement map. These blue boxes provide a rough visual representation of the area of land required. However, in isolation, they have no bearing on the findings of the study. Larger (rather than smaller) parcels were generally sought for efficiency.

Great Wyrley was found to make a more limited contribution to the Green Belt purposes as set out in paragraph 80 of the NPPF when compared with other settlements. The sites south of Holly Lane fall within 'Parcel 3' of the Green Belt assessment review and Paragraph 4.23 of the Review document states that:

"Parcel 3 is deemed to make a contribution to the Green Belt purposes. While the parcel contains regular open fields with views of the surrounding countryside, the parcel also contains some ribbon development along the A34, the small hamlet of Upper Landywood which has merged with the urban edge of Great Wyrley and Landywood Primary School. These relatively significant pockets of development combined with the urban edge of Great Wyrley bordering the northern, eastern and western edges of the northern half of the parcel compromise the openness of and urbanise the countryside within their immediate vicinity."

As per the comments above, the assessment parcels should be reviewed considering the housing requirements and further assessment of the areas around Landywood undertaken. Having regard to the five Green Belt purposes in paragraph 80 of the NPPF, the lands south of Holly Lane are suitable for limited Green Belt release.

To assist the Council in their consideration of sites, an assessment has been undertaken of the land south of Holly Lane, against the Green Belt purposes. This is set out below, and demonstrates that the sites are suitable for release from the Green Belt. When compared with other potential Green Belt releases further to the west in the settlement area at Cheslyn Hay - at Saredon Road and Wolverhampton Road – the two sites at Holly Lane encroach less into the open countryside and form more logical extensions/rounding off for the settlements, contributing to the area's housing needs.

Green Belt Purpose	Justification
To check unrestricted sprawl of large built-up areas	The sites have development adjacent to at least two of their existing boundaries, are both flat in nature and have clear field boundaries which are reinforced by existing hedgerow. The land north of Landywood Farm is enclosed on all sides by development and a defined boundary – the railway line.
To prevent neighbouring towns merging into one another	The sites are located to the south of Landywood and neither site extends further south beyond the village's existing extent of development. They would in effect be enclosed by development and well-defined hedgerow/field boundaries. There are no other settlements to the south for some distance, which could be considered at risk of merging with Landywood through the two sites identified and the extent of their boundaries, either practically or perceptually.
To assist in safeguarding the countryside from encroachment	The sites have a clear and strong relationship with the existing edge of the settlement, with the extent of development defined by existing features – hedgerows, field boundaries, a farm, school, railway line and residential property.
To preserve the setting and special character of historic towns	The site is outside of any Conservation Area and there are none nearby which could be deemed to preserve the setting and special character.
To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	There are no specific urban regeneration projects within Cheslyn Hay and Great Wyrley.

CONCLUSION

It is requested that the comments detailed above are taken into consideration in progressing the Local Plan Part Two: SAD Public Plan and further Green Belt Reviews. The two sites south of Holly Lane which form these representations clearly represent obvious and enclosed locations for development in a sustainable location, whereby future residents can support the vitality and viability of the existing services that Landywood and nearby Cheslyn Hay and Great Wyrley all offer.

Having regard to the Council's housing requirements in terms of its supply position, and ensuring the Council is able to accommodate future development needs, additional land, such as lands south of Holly Lane both east and west of the railway line, needs to be released from the Green Belt.

APPENDIX – SITE ASSESSMENT AGAINST THE SOUTH STAFFORDSHIRE SELECTION CRITERIA

TIER 1 ASSESSMENT													
Site Name	Sequential Test	Impact on the Green Belt	Landscape Sensitivity	Accessibility to Amenities (Inc. Employment)	Surface water flooding	Highways (accessibility to the site.)	Impact on current land use and loss of facilities	Impact on Natural Environment	Impact on Environmental Quality	Impact on Historic Environment	Tier 1 assessment comments	Qualitative assessment of material planning considerations	Conclusion

North of Landywood Farm											<p>The site is in the Green Belt but adjacent to the village boundary on two sides. It is well defined on the east boundary by the railway line.</p> <p><u>Landscape Sensitivity</u> – The land cover parcel that the site falls within was deemed to be of medium sensitivity. <u>Accessibility to amenities</u> -The site has very good pedestrian and vehicular access to the adjacent Landywood railway station and is within close proximity to shops and services along Wardles Lane.</p> <p><u>Loss of facilities</u> - loss of agricultural/grassland. <u>Natural Environment</u> – As with other sites in the area it is believed to be Grade 4 agricultural land. There are no ecological designations affecting the site and no public rights of way crossing this land.</p> <p><u>Environmental Quality</u> - The site is located outside of the at-risk flood risk zones.</p> <p>Site may require noise assessment and mitigation – railway line adjacent to the site boundary on one side.</p> <p><u>Historic Environment</u>– If the site was allocated then the applicant would need to have regard to the Staffordshire HLC assessment - specifically where historic field boundaries exist.</p>	<p>The site has capacity to provide opportunities for community infrastructure and is in walking distance from existing employment opportunities and services. It has good access to bus and train services. The site also has good access to the strategic highway network, with the A34 at the eastern end of Landywood providing a direct route onto the M6 toll road to the north, beyond Great Wyrley. The site is large enough to meet the allocation and provide the necessary levels of open space. The site could see the effective use of natural boundaries in particular existing hedgerows/tree belts along the southern boundary.</p>	<p>The site is very close to a range of services and facilities including the primary school, public house, employment sites and several bus stops along Strawberry Lane and Streets Lane. It is also within 1 km walk of Landywood railway station, which provides an hourly service between Birmingham and Rugeley on weekdays. Also within approximately 1km are services in the centre of Landywood including a community centre, church and shops.</p> <p>Development would not extend further beyond the existing building line immediately east of the site, at the Primary school. The field boundary hedge lines provide a well-defined enclosure for development which is well-related to the existing built form at Landywood and Great Wyrley. Therefore, the site is suitable to meet housing requirements for Cheslyn Hay and Great Wyrley.</p>
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West of Primary School, Landywood											<p>The site is in the Green Belt but adjacent to the village boundary on two sides. It is well defined on the west boundary by the railway line.</p> <p><u>Landscape Sensitivity</u> – The land cover parcel that the site falls within was deemed to be of medium sensitivity. <u>Accessibility to amenities</u> -The site has very good pedestrian and vehicular access to the adjacent Landywood railway station and is within close proximity to shops and services along Wardles Lane.</p> <p><u>Loss of facilities</u> - loss of agricultural/grassland. <u>Natural Environment</u> – As with other sites in the area it is believed to be Grade 4 agricultural land. There are no ecological designations affecting the site and no public rights of way crossing this land.</p> <p><u>Environmental Quality</u> - The site is located outside of the at-risk flood risk zones.</p> <p>Site may require noise assessment and mitigation – railway line adjacent to the site boundary on one side.</p> <p><u>Historic Environment</u> – Development of this site would need to have regard to the Grade II listed Landywood Farm which is located to the south of the site. This could be achieved through design solutions.</p>	<p>The site has capacity to provide opportunities for community infrastructure and is in walking distance from existing employment opportunities and services. It has good access to bus and train services. The site also has good access to the strategic highway network, with the A34 at the eastern end of Landywood providing a direct route onto the M6 toll road to the north, beyond Great Wyrley. The site is large enough to meet the allocation and provide the necessary levels of open space. The site could see the effective use of natural boundaries in particular existing hedgerows/tree belts along the southern boundary</p>	<p>The site is very close to a range of services and facilities including the primary school, public house, employment sites and several bus stops along Strawberry Lane and Streets Lane. It is also within 1 km walk of Landywood railway station, which provides an hourly service between Birmingham and Rugeley on weekdays. Also within approximately 1km are services in the centre of Landywood including a community centre, church and shops.</p> <p>Development would not extend further beyond the existing building line immediately east of the site, at the Primary school. The field boundary hedge lines provide a well-defined enclosure for development which is well-related to the existing built form at Landywood and Great Wyrley. Therefore, the site is suitable to meet housing requirements for Cheslyn Hay and Great Wyrley.</p>
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