



South Staffordshire Council

Site Allocations Publication Plan Response Form

Part A: Your Details (Please Print)

Please ensure that we have an up to date email wherever possible, or postal address at which we can contact you.

	Your Details	Agent's Details (if applicable)
Title		Mr
First Name		Simon
Last Name		Hawley
E-mail Address		
Job Title (if applicable)		Director
Organisation (if applicable)	SBL Property Ventures c/o Agent	Harris Lamb Property Consultants
Address		75-76 Francis Road Edgbaston Birmingham
Post Code		B16 8SP
Telephone Number		

Please note the following:

- *Representations cannot be kept confidential and will be available for public scrutiny, however your contact details will not be published.*
- *Your details will be added to our Local Plans Consultation database.*

All comments made at the Preferred Options stage have been taken into account in the production of the Publication Plan and will be submitted to the Inspector. The Publication Plan is a regulatory stage and any representations should relate to the legal compliance and soundness of the document.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change as there will not normally be a subsequent opportunity to make further representations.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Part B: Please use a separate sheet for each representation

Please complete a new form for each representation you wish to make.

1. To which part of the Site Allocations (SAD) Publication Plan does this representation relate?

Paragraph	
Policy	SAD2 – Housing Allocations – Perton
Proposals Map	48 – Perton

2. Do you consider the Site Allocations Publication Plan is **Legally Compliant**?

Yes	<input type="radio"/>	No	<input type="checkbox"/>
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Please give reasons for your answer. Please be as precise as possible:

3a. Do you consider the Site Allocations Publication Plan to be **Sound**?

Yes		No	Ö
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3b. Do you consider the Publication Plan to be **unsound**, because it is not:

	<i>Tick</i>
Positively Prepared: The plan should be prepared based on a strategy, which seeks to meet objectively assessed development and infrastructure requirements.	Ö
Justified: The plan should be the most appropriate strategy, when considered against the reasonable alternatives.	Ö
Effective: The plan should be deliverable.	Ö
Consistent with national policy: The plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.	

Please give reasons for your answer. Please be as precise as possible:

It is our view that additional land should be allocated for development at Perton. We explain in our representations to the overall housing requirement why it is our view that additional housing land needs to be allocated in South Staffordshire. As a consequence we do not repeat this here. Perton is a suitable sustainable location for additional development to help meet the increased housing requirement.

Perton is identified as a Main Service Village by the Core Strategy and it is, therefore, in the top tier of the settlement hierarchy. It has a range of services and facilities including a large supermarket, library and various schools and a medical centre. It also has the benefit of being in close proximity to Wolverhampton. Indeed Perton adjoins the built up edge of Wolverhampton in a number of locations.

In this context we are of the view that three further sites should be allocated for residential development by the SAD. Details of these sites are provided below. Plans showing the extent of the site are attached.

Land to the west of Yewtree Lane

The land to the west of Yewtree Lane comprises a 4.3 hectare field. Whilst it is separated from Perton it immediately adjoins the built up edge of Wolverhampton. This creates a number of advantages. Whilst Perton itself is a sustainable settlement this site also has the benefit of access to the wide range of services and facilities available within Wolverhampton in

this locality. There are various shops, primary and secondary schools and areas of public open space within Wolverhampton in the vicinity of the site. The site is, therefore, in a sustainable location with access to a variety of services and facilities. It could play a role in meeting the growth requirements of South Staffordshire or Wolverhampton and the wider conurbation.

As with all land beyond the settlement boundary of Perton the site is in the Green Belt. The role the site plays in the area of Green Belt was assessed through the South Staffordshire Partial Green Belt Review (November 2016). The site forms part of Area 2, which is a large swathe of land between the north eastern edge of Perton and Wolverhampton. The Green Belt assessment identifies Parcel 2 as playing a number of important Green Belt roles. However, when this site is looked at in isolation it is apparent that it plays a limited Green Belt role.

The Green Belt Assessment assesses the role that Parcel 2 plays in an area of Green Belt against the five purposes of Green Belt land included within the Framework. The Green Belt Assessment confirms that the parcel as a whole does not preserve the setting and special character of historic towns and does not assist in urban regeneration. The site is, however, identified as being sensitive in a number of other respects.

It is suggested that Parcel 2 plays an important role in checking the unrestricted sprawl of large built up areas. Whilst the site is adjacent to the Wolverhampton administrative area it is an accepted position that development must happen within the Green Belt to meet the growth requirements of South Staffordshire. Furthermore development will be required in the Green Belt to meet the growth requirements of Birmingham City and the Black Country adjacent to the wider conurbation. The Strategic Housing Needs Study (referred to in paragraph 6.9 of the SAD) confirms that one of the preferred options in meeting the growth requirements of the conurbation is to deliver development in close proximity to the conurbation where the development pressures arise from. As such the expansion of the conurbation into the Green Belt highly likely.

It is also advised that assessment Parcel 1 plays an important role in preventing neighbouring towns merging into one another. Whilst this is true of the Parcel as a whole it is not the case that this individual site that does not play any real role in preventing Wolverhampton and Perton merging into one another. The site has strong boundaries that can be reinforced through any development. In addition, it is not necessary for the entire site to be developed as selected areas to the south could be kept open in order to help maintain the gap. In this regard it should be noted that Perton Middle School, that lies to the immediate south of the site, effectively bridges the gap between Perton and Wolverhampton in this location significantly reducing the sensitivity of this gap to additional development.

It is also suggested that the site plays a role in assisting and safeguarding the countryside from encroachment. Clearly any development in the Green Belt will have some impact upon encroachment. However, it is

already an accepted position that development in the Green Belt is required. As a consequence the site should not be considered sensitive in this regard.

Land at the junction of Perton Road and Jenny Walkers Lane

The second site comprises an irregular shaped parcel of land located to the east of Jenny Walkers Lane and south of Pattingham Road. The site is approximately 2 hectares in size and includes the property, The Coach House. There are various buildings within the vicinity of the site including residential properties accessed off Pattingham Road, agricultural properties to the south east and a large farm complex and the "Tough Guy" course to the west. As with the previous site it has good access to the variety of services and facilities provided within Perton and Wolverhampton. It is ideally placed to meet the growth requirements of these two settlements. Whilst there is a degree of separation between the site and Perton it well relates to the built up edge of Wolverhampton to form a natural extension to the City.

The site is not assessed as part of the South Staffordshire Partial Green Belt Review. It does, however, immediately adjoin assessment parcel 5C. The Green Belt assessment acknowledges that this parcel does not play any real role in preserving the setting and special character of historic towns or in assisting urban regeneration. It is, however, identified as being sensitive in a number of regards. These sensitivities do not, however, directly apply to this site.

It is suggested that Parcel 5C is sensitive as its development could result in the unrestricted sprawl of a large built up area. However, as stated above, development in the Green Belt is inevitable and it is highly likely that development will need to take place next to the edge of Wolverhampton to meet the growth requirements of the conurbation. The site should not be penalised for being within 200m of Wolverhampton. Indeed, this provides a range of benefits in terms of access to services and facilities.

It is also suggested that development of Parcel 5C could result in Perton and Wolverhampton merging into one another. This is not true of this site. Perton will be brought no closer to Wolverhampton than the existing development along the Perton Road.

It is suggested that the site plays an important role in safeguarding the countryside from encroachment. However, as referred to above, some encroachment into the Green Belt is inevitable given that it is accepted position that development is happening in the Green Belt. This site already has built development on it, and it is surrounded by built development. It is not a particularly sensitive location for encroachment. The site provides the opportunity to deliver new residential development in a sustainable location in the short term.

Land North of Perton Road

Land to the north of Perton Road comprises two fields separated by a series of agricultural buildings. The site is rectangular in shape and approximately 2.4 hectares in size. It is enclosed by development to the north, east and south and at part of the western boundary. The surrounding development is residential in nature.

A small section of the southern section of the site is within the administrative area of Wolverhampton. The vast majority of the site is, however, in South Staffordshire.

As per the two sites referred to above the site benefits from a significant range of services and facilities that are available in both Perton and Wolverhampton City. It already forms part of the functional urban area given its relationship to the surrounding land uses.

The site forms part of Green Belt Assessment Parcel 2 in the South Staffordshire Partial Green Belt Review. Green Belt Assessment Parcel 2 runs along the southern edge of Perton between the settlements and the built up edge of Wolverhampton City.

As with the two sites above the Green Belt settlement confirms that this assessment parcel does not play any role in preserving the setting and special character of a historic town or in urban regeneration. It is, however, suggested that the assessment parcel is sensitive in other regards. It should, however, be noted that:

- The site does not play any real role in checking the unrestricted sprawl of a large built up area. The site is already largely surrounded by development and is a functioning part of the wider built up area.
- The site does not play any particular role in preventing neighbouring towns merging into one another. The site is already surrounded by development and there is already a strong degree of coalescence in this locality.
- Development of the site would result in some encroachment. However, as referred to above Green Belt development is inevitable and as a consequence encroachment is inevitable.

It is our view that the above three sites will be allocated for development by the SAD. If, however, it is concluded that this is not appropriate they should be identified for allocation though the local Plan review.

4. Please set out below what change(s) you consider necessary to make the Publication Plan sound or if you wish to support the legal compliance or soundness of the document.

The three sites referred to above should be allocated for development by the SAD. If, however, it is concluded that this is not appropriate they should be allocated for development by the Local Plan review.

5. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

<i>Tick</i>	
No , I do not wish to participate at the oral examination	
Yes , I wish to participate at the oral examination	Ö

6. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

We would like to attend the examination in order to explain the merits of allocating the site for development.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature		Date	

All comments should be made in writing using this form by email, or post or by letter.

Email:

sadconsultation@sstaffs.gov.uk

Post:

Local Plans Team
Planning and Strategic Services,
South Staffordshire Council Offices,
Wolverhampton Road,
Codsall,
South Staffordshire,
WV8 1PX

**Your completed representation must be received by
12 noon on Monday 27th February 2017**

