



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	█	█
First Name	██████	██████
Last Name	█	██████
E-mail Address	Correspondence care of Agent	██
Job Title (if applicable)	Strategic Planning Specialist	Director
Organisation (if applicable)	IM Land	Harris Lamb Property Consultancy
Address		██ ██ ██
Post Code		██████
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cannot be kept confidential and will be available for public scrutiny, however your contact details will not be published.*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 – Huntington
Proposals Map	

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

Yes	<input type="radio"/>	No	
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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:

An additional housing allocation should be made at Huntington. It is acknowledged that the "minimum" quantum of development directed towards Locality 1 by the Core Strategy has been met. However, as this is a minimum requirement it can be exceeded and further allocation made. Land at Limepit Lane, Huntington should be identified for housing. Part of the proposed allocation was identified as a residential site by the Local Plan 1996. There is no logical reason why this allocation should now be excluded from the SAD.

Attached to this representation is a plan that shows the full extent of IM's land interest at Huntington. To confirm, we are not advocating the identification of the section of the site that falls inside the AONB as an area of housing. We are, however, of the view that the western section of the site, that immediately abuts the settlement boundary, is a suitable and sustainable location for residential development that should be allocated in the SAD.

The land in IM's control is divided into two parcels by Limepit Lane, that crosses the centre of the site east to west. The parcel of land immediately to the south of Limepit Lane, adjacent to residential areas to the west, was allocated for development by the Local Plan 1996. Attached to these representations is the Huntington Insert Plan (48) from the South Staffordshire Local Plan 1996. Part of IM's land interest is identified as "Housing Proposal Site 3 – Policy H3.GB3". Policy H3 – Proposed Housing Sites, of the Local Plan, identifies the site as Oaklands Farm, Huntington. It is a 2.7 hectare site identified for the development of 65 dwellings. The

policy's supporting text advises that access to the site will be from Limepit Lane. The Highways Authority has agreed to the construction of a small roundabout in this location. The policy also makes reference to the site being excluded from the Green Belt to allow it to be allocated for housing. The site had the benefit of planning permission by virtue of planning permission 95/00455. This planning permission was not, however, implemented and time expired a significant period ago.

Policy H4 of the Local Plan 1996 is not a saved policy. We have been advised that it was not saved due to the fact that all the allocations within the policy were built out. It is, however, evident that this is not correct. While the site had the benefit of planning permission it was not implemented.

Despite the fact that the site has previously had the benefit of a residential allocation in the adopted Local Plan and the benefit of planning permission, albeit time expired, the emerging SAD does not allocate the site for housing. This is inappropriate. The allocation from the 1996 Local Plan should be carried forward to the SAD. The site has already been found to be a suitable location for residential development through the plan making and decision taking process. It is, therefore, our view that the allocation should be reinstated.

It is also a significant material consideration that the supporting text to the allocation in the 1996 Local Plan advises that the site was excluded from the Green Belt. Whilst the site may be identified as an area of Green Belt in the 1996 Local Plan Policies Map this does appear to be a map error. In any event, the Policies Map does not have development plan status in the way that the text of the Development Plan does. If the site is outside of the Green Belt, as the Local Plan 1996 clearly suggests, "exceptional circumstances" are required to amend the Green Belt boundary in accordance with the requirements of paragraph 83 of the Framework. Exceptional circumstances are required whether land is to be included or excluded from the Green Belt. No exceptional circumstances have been put forward in this case to warrant any amendments to the Green Belt boundary. On this basis it would be completely inappropriate for the site to be included within the Green Belt in the SAD.

Turning to the wider site, including land to the north of Limepit Lane, it is clearly a suitable location for development. The Council's Landscape Assessment Sensitivity Study 2015, identifies the vast majority of the site as being of "medium" landscape sensitivity. With the exception of the area of safeguarded land identified by the emerging SAD (SAD3 – Site 016) and a small parcel of land to the north east of the settlement, it is the only assessed land adjacent to the settlement boundary that is not of "high" landscape sensitivity. The site being promoted for development forms part of landscape area HN4, HN5, HN6 and HN7 in the landscape sensitivity study. All of these areas, with the exception of area HN5 are considered to be capable of accommodating development from a landscape perspective by the study. Whilst there is concern expressed about development of parcel of land HN5, it is not envisaged that any development will take place here. It is a heavily treed area which we

expect to be kept open as part of development of the site.

The Council's SHLAA also makes a number of helpful comments regarding the site. The site forms SHLAA sites Huntington 013, 014 and 015. The SHLAA adopts a traffic light system to assess sites. The only area where the site is identified as "red" is impact on the Green Belt. This is, however, the case with all the land around the edge of Huntington. In addition, as referred to above, it is questionable whether all the land in IM's control should be considered to be in the Green Belt. The site performs well in all other categories including access to employment, services and facilities, and the local highways network. Indeed, Huntington is a sustainable settlement with access to a wide variety of services and facilities.

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.

Whilst the quantum of development directed towards Huntington by the Core Strategy has been reached, this is a "minimum" target. It is evident that significant additional development will be required in the locality in the future. It is, therefore, respectfully requested that land at Limepit Lane is allocated for residential development by the Plan.

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	√

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

The opportunity to explain why land at Limepit Lane, Huntington should be allocated for residential development before the Inspector is requested.

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**

