

8th September 2017

Black Country Planning
Council House
Priory Road
Dudley
DY1 1HL

VIA EMAIL ONLY: blackcountrycorestrategy@dudley.gov.uk

Our Ref: 416.07553.00001

Your Ref: Black Country Core Strategy Issues and Options & Call for Sites

Dear Sir/Madam,

RE: REPRESENTATIONS TO THE BLACK COUNTRY CORE STRATEGY ISSUES AND OPTIONS DOCUMENT & CALL FOR SITES – LAND AT SPRINGHILL LANE, WOLVERHAMPTON

With regard to the above consultation, SLR has been instructed to submit representations on behalf of our client(s), Jay Farm Homes Limited and Lawnswood Homes Limited. With regard to the Call for Sites process, this relates to our client(s) land interests at Springhill Lane, Wolverhampton which is clearly defined within the submission documents. This submission consists of the following information:

- Site Location Plan (CJZ Design Limited drawing no. 1150/100);
- Call for Sites Questionnaire duly completed;
- Black Country Core Strategy Response Form duly completed;
- Land Promotion Document prepared by SLR Consulting Limited; and
- Black Country Core Strategy Issues and Options Report Consultation Document prepared by SLR Consulting Limited.

As you will note, the land at Springhill Lane, Wolverhampton is located within the administrative bounds of South Staffordshire Council but is located immediately adjacent to the administrative area and settlement boundary of The City of Wolverhampton. Following review of the Black Country Core Strategy Issues and Options document it is understood that sites within adjoining authorities adjacent to the Black Country Core Strategy area are being welcomed for submission to the Call for Sites process.

Green Belt

The site is currently located within the designated Green Belt which, in this area of South Staffordshire, has not been reviewed since its inception in the 1970s. Indeed, in this respect, it is our contention that South Staffordshire District Council has failed to undertake a robust and comprehensive Green Belt Review which duly considers sites on the urban fringe of Wolverhampton.

It is worth noting that the recent Partial Green Belt Review was predicated by a Core Strategy requirement (Core Policy 6) that only sites located around the 15 principal settlements within South Staffordshire should be considered for release from the Green Belt. This has, therefore, failed to undertake a comprehensive review of sites adjoining the urban fringe which could be more sustainable and deliverable than those considered within either the Partial Green Belt Review or subsequent Strategic Housing Land Availability Assessment.

Relationship with the Black Country

It is noted that the Core Strategy Issues and Options document identifies that there will need to be a significant release of Green Belt land within the Black Country area and also likely duty to co-operate with adjoining authorities to accommodate some of the housing need for the wider Housing Market Area. In this respect, the urban fringe of Wolverhampton is likely to be a much more sustainable location than pushing the HMA housing needs further away from the urban area and into the countryside. Given the associated commuter distances from the Black Country, such urban fringe sites are considered much more sustainable in terms of attracting, retaining and diversifying the economic workforce required to meet the ongoing needs of the Black Country area.

Indeed these economic pressures within the Black Country have somewhat resulted in the current shortfall of housing land provision within the HMA given that brownfield employment land that was expected to be released is now likely to be retained for economic use. This success has resulted in the Black Country HMA being pushed further out into adjoining authorities, including that of South Staffordshire District Council. Given this fact, a realistic and sustainable approach should be given to the location of any land being release for development, with urban fringe locations considered much more sustainable than sites further afield.

Site Consideration

Analysis of planning and environmental issues, as set out in the Land Promotion Document, identifies that there are no major constraints to development. With a positive and proactive approach, development could capitalise on the attributes of the site and measures could be incorporated to mitigate potential effects.

This Report has identified a range of opportunities and benefits which the delivery of this land for housing could secure. These include the following;

- Delivery of accessibly located land to meet identified and future housing requirements.
- Release of Green Belt land which has already been the subject of erosion in terms of function and is located outside of any other protective designations.
- Opportunity to identify safeguarded land to avoid successive Green Belt reviews, which would run contrary to NPPF.
- Opportunity to enhance the settlement edge of Wolverhampton and the wider landscape setting of the site and surrounding area.
- Potential to enhance biodiversity and implement a native planting scheme to complement the new development, open space provision and ecological connectivity.
- Delivery of a site which can be readily linked into the wider infrastructure network, coupled with the potential delivery of a much needed public building which could be utilised for a nursery and village hall (if required).

- The site is bound by significant land holdings within the ownership of Staffordshire County Council and, whilst no formal discussions have taken place as yet, could provide an opportunity to release a larger development site which could form a strategic allocation meeting the needs of both South Staffordshire and the wider Black Country Housing Market Area.
- Provide assistance to the adjoining Black Country Core Strategy and Housing Market Area in delivering their housing requirements.

The above is not an exhaustive list at this stage, but provides a flavour of some of the opportunities and benefits which the development of this site could secure.

Closure

We trust that the above and enclosed are sufficient to allow for the due consideration of these representations and the Call for Sites submission at Springhill Lane, Wolverhampton. However, should you have any queries, please do not hesitate to contact me.

Yours sincerely

SLR Consulting Limited



Principal

Enc. As above