	<p><b>Local Plan</b> Publication Stage Representation Form</p>	<p><b>Ref:</b></p> <p><b>(For official use only)</b></p>
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**Name of the Local Plan to which this representation relates:**

**South Staffordshire Council Local Plan 2018 - 2039**

**Please return to South Staffordshire Council BY 12 noon Friday 23 December 2022**

This form has two parts –  
 Part A – Personal Details: need only be completed once.  
 Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

## Part A

		2. Agent's Details (if applicable)
<b>1. Personal Details*</b>		
<i>*If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.</i>		
Title	Mr	Mr
First Name	Alastair	Paul
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(where relevant)

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## Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph	Policy	DS5	Policies Map	
(1) Legally compliant	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No <input type="checkbox"/>
(2) Sound	Yes		No	<input checked="" type="checkbox"/>
(3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

**Policy DS5 – The Spatial Strategy to 2039** makes clear that throughout the District, growth will be located at the most accessible and sustainable locations in accordance with the settlement hierarchy, whilst recognising opportunities to deliver local infrastructure. In doing so, the principal aim will be to meet needs in a manner which builds on the District’s existing infrastructure and environmental capacity.

### Settlement Hierarchy and Featherstone

Table 8 of the SSLP provides a breakdown of how the housing growth will be distributed across the District based on the strategy and the settlement hierarchy, including the level of growth assigned to Featherstone. Under draft Policy DS5, Featherstone is identified as a ‘Tier 3 settlement’. The policy proposes that Featherstone, as one of the tier 3 settlements, holds a smaller range of services and facilities than Tier 1 and 2 settlements and as such are given a ‘lesser level of growth’. This is reinforced in the supporting text (paragraph 5.39), which highlights that growth at Featherstone will be ‘limited’ due to current service provision, but also due to their proximity to more sustainable larger scale growth option proposed adjacent to the northern edge of the Black Country, and the existing growth already delivered at Featherstone during the plan period.

In line with its position in the hierarchy, Table 8 of the SSLP assigns 121 dwellings to Featherstone over the plan period, comprising 86 dwellings on existing sites with planning permission and a site identified in the existing Site Allocations Document, and

35 dwellings on another site previously safeguarded for release from the Green Belt. This represents 1.2% of the total amount of housing land provided for in the SSLP. The image below, taken from the SSLP (on page 38) provides a diagrammatic representation of the proposals showing the safeguarded site only, for Locality 3, which includes Featherstone.



RPS notes that the two sites identified in the SSLP for housing development are located to the west of Brookhouse Lane, but are wedged between the existing built-up area of the settlement and the proposed for 'green infrastructure' adjacent to the ROF Featherstone employment site further to the west. The provision of this new area of green space would thus restrict any further extension of the built-up area to the west of the settlement. The rest of the settlement is tightly bound by existing Green Belt and areas of high landscape sensitivity to the north, with very little opportunity for further infilling within the built-up area. Any further growth at Featherstone would therefore require an alteration to the existing Green Belt boundary. The precedent for this has already been established by the release of the two sites identified in the SSLP which were both formerly located in the Green Belt. It is therefore appropriate to consider the potential for further growth to be directed to Featherstone in this context, recognising that this would necessitate the alteration of the Green Belt in this location. However, the SSLP does not propose any further site allocations or any additional release of land from the Green Belt at Featherstone. RPS contends that the Council has, through its evidence base, sought to underscore the potential for Featherstone to support higher levels of growth as a basis for limiting any further development opportunities in the SSLP. However, this is not considered justified when taking into account the following factors.

The key piece of evidence base used to inform the proposed settlement hierarchy, and thus the basis for the proposed distribution of housing growth across the District, including at Featherstone, is the Rural Services and Facilities Audit 2019. Paragraph 1.1 of the audit states,

*"The purpose of this report is to offer evidence on the relative level of services and facilities present in settlements within South Staffordshire. This then allows the study to propose a revised settlement hierarchy..." (RPS emphasis)*

In assessing the relative sustainability of Featherstone, a number of indicators have been applied in the audit (listed at paragraph 3.2 of the report), notably:

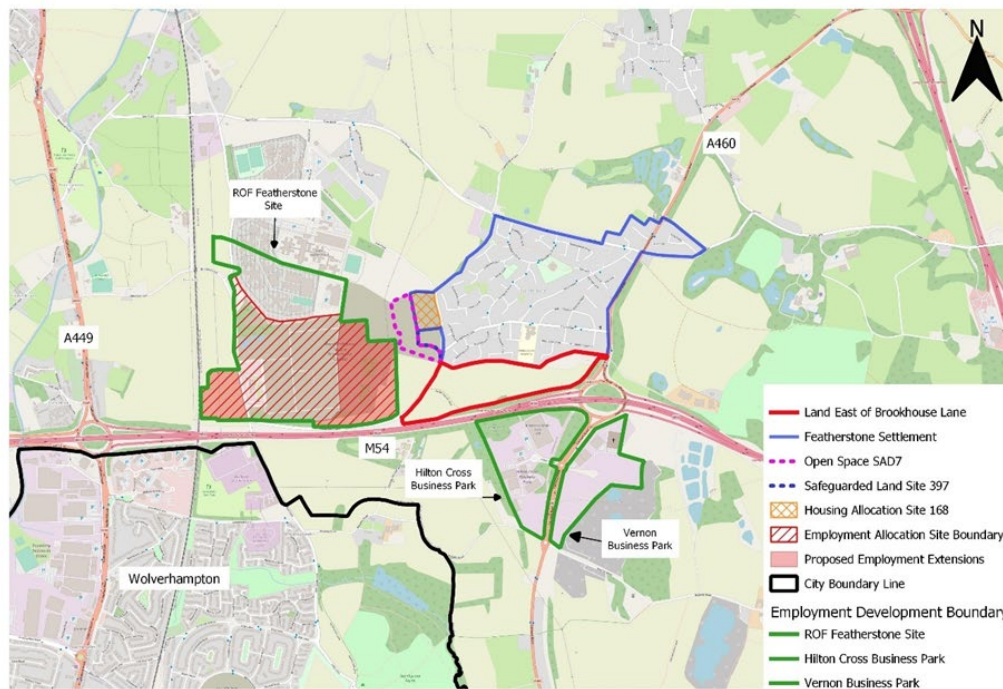
- Access to food stores



- Diversity of accessible community facilities/services
- Access to employment locations
- Access to education facilities
- Public transport access to higher order services outside of the village

In relation to access to employment locations, the audit scores Featherstone as 'medium' (see Appendix 4 of the audit), but scores Featherstone amongst the highest settlements in terms of public transport access to higher order services outside the settlement (see Appendix 5 of the audit).

The basis for the 'medium' score for access to employment locations related to Featherstone is set out in Appendix 3 of the audit. The analysis utilises the 'Hansen' methodology, which has been applied with respect to accessibility to defined employment centres. RPS notes that the analysis has identified two 'employment sites' in close proximity to Featherstone, which RPS assumes to be the HMP Featherstone (located to the north-east edge of the settlement) and Hilton Main Industrial Estate (located to the south of junction 1 of the M54, east of the A460), as neither sites are named in the audit. However, RPS considers that two additional employment sites have been excluded from the assessment, namely Hilton Cross Business Park (located south of Junction 1 M54, to the west of A460) and the ROF Featherstone employment site (which is currently the subject of a planning application ref. 20/01131/OUT awaiting determination). RPS contends that these sites are well located to Featherstone (both less than 800 metres from the edge of the settlement) and would provide good access to local employment for residents either on foot or by public transport. The plan below illustrates how close Featherstone is located in relation to the nearest employment centres.





On this basis, the presence of large-scale employment sites in such close proximity to Featherston is clearly relevant to the assessment of employment locations available to (existing and future) residents of in Featherstone and thus are relevant to the consideration of future growth locations identified through the SSLP at Featherstone. When taking into account the provision of existing employment at Hilton Cross Business Park, and the emerging provision at ROF Featherstone, this would, in RPS opinion, lead to a different score for Featherstone in terms of access to employment. RPS suggest that a score of 'Good', and not 'medium', is more appropriate in this regard. The under-scoring of Featherstone with respect to access to local employment, as shown above, is not justified on the available evidence which has been ignored or overlooked in the Council's assessment of the settlement.

In reality, Featherstone and the Site are well-located in strategic terms, being close to a range of local employment, but is also accessible to the West Midlands conurbation via public transport (i.e. bus service 67 Wolverhampton - Cannock via Shareshill). Featherstone is therefore ideally placed to accommodate additional housing to help balance the provision of employment currently provided and also planned for in the future, as well as further assist in addressing the identified housing shortfall in the wider-HMA. This 'balanced approach' to homes and jobs can assist in reducing the level of out-commuting, which the Council has identified as a key challenge for the District (see Table 4 of the SSLP) and which is consistent with the Plan Vision, which is to 'create thriving new places in which people can live and work'.

Based on the foregoing analysis, RPS contends that an ideal opportunity to achieve this is by focusing more growth at Featherstone. However, the factors detailed above have been ignored or underplayed in respect of the assessment of Featherstone as a suitable settlement for accommodating additional growth over and above the 1.2% contribution currently proposed in the SSLP. The strategy which seeks to limit growth at Featherstone does reflect the available evidence and so is not soundly-based (not justified).

The Land east of Brookhouse Lane, being promoted by Persimmon Homes, represents an ideal opportunity to help deliver this.

### **Growth adjacent to the neighbouring towns and cities in the Black Country**

Policy DS5 proposes three allocations near to or on the boundary of the West Midlands conurbation that could assist in meeting the unmet housing needs from the wider HMA; this includes the 'Land at Cross Green'. The supporting text (at paragraph 5.31 of the SSLP) highlights that this site 'recognises the recommendations for a strategic housing site in this area in the GBBCHMA Strategic Growth Study and the area's proximity to significant employment opportunities at ROF Featherstone strategic employment site, as well as being close to i54 South Staffordshire' and its 'proximity to the City of Wolverhampton'.

RPS notes that the SSLP does not apportion to any site any of the unmet housing needs specifically from the Black Country alone (though it does in respect to unmet need for employment land at paragraph 5.58). Nonetheless, it is reasonable to assume that the Land at Cross Green is expected to mop up housing need emanating from the Black Country, and in particular Wolverhampton. This is because, as explained in separate submissions (under Policy DS4) the functional relationship between South Staffordshire

and the Black Country in terms of migration and commuting flows is relatively stronger here compared to other areas in the GBBCHMA (excluding Birmingham).

However, the importance being placed on the SGS as the basis for allocating this site to address the needs of the Black Country raises concerns regarding the soundness of this approach. Specifically, the SGS does not take into account the relative affordability of housing in this area and its ability to meet the needs of black country residents. RPS explores this issue further below, in relation to housing affordability and tenure mix.

In relation to housing affordability, the table below uses lower super output area data to compare house prices (as at March 2022) between Cross Green, Featherstone, and the Black Country. The outputs are summarised below.

<b>Mean House Price - All dwellings - by Lower Super Output Area (March 2022)</b>				
<b>Location</b>	<b>LSOA code</b>	<b>LSOA Name</b>	<b>Price</b>	<b>% Difference between BCAs</b>
Black Country Authorities	All	All	£199,388	-
Cross Green	E01029616	South Staffordshire 006A	£368,516	59% higher
Featherstone	E01029635	South Staffordshire 007D	£184,869	7.6% lower
	E01029637	South Staffordshire 006D	£209,277	4.8% higher
Featherstone settlement	Average		£197,073	1.2% lower
Source: HPSSA Dataset 47				

The data shows that house prices within the area where the Land at Cross Green site is allocated are nearly 60% higher than the average house price across the Black Country. This compares to prices in Featherstone which are currently very similar, albeit slightly lower (1.2%), than in the Black Country. On this basis, households moving from the Black Country are much more likely to be able to afford property in Featherstone compared to new homes built in the Cross Green area, and therefore be in a much better position to meet their housing needs in Featherstone.

In relation to tenure split, Census data (2011) which remains the latest published data at this time), illustrates a significant disparity between the Cross Green area and the Black Country, and much greater similarity between the Black Country and Featherstone. Notably, the disparity between Cross Green and the Black Country is most significant in respect of housing in owner occupation. This is evident in the figure below.

This further supports the case for housing needs from the Black Country to be directed to Featherstone, where a broader mix of households already exists and where a mix of market and affordable housing can be easily integrated into the settlement.



**Tenure – Households (2011)**

Area	All categories: Tenure	% Owned	% Shared Ownership	% Social Rented	% Private Rented	% Living Rent Free
Cross Green LSOA	681	85.9%	0.4%	2.1%	9.8%	1.8%
South Staffordshire	44,458	75.7%	0.6%	13.9%	8.5%	1.3%
Featherstone settlement LSOAs	1,397	70%	0.4%	21.7%	6.8%	1.1%
Black Country Authorities	461,364	64.1%	0.5%	24.9%	11.7%	1.7%

Source: Census 2011 (QS405EW - Tenure)

The analysis set out above this brings into question the soundness of the approach in respect to the strategic location at Cross Green and specially whether households from the Black Country will be able to access housing if it is built in the Cross Green area. These factors have been ignored by the Council, which raises significant doubts that the needs of the Black Country residents will be met to any significant degree if housing is delivered at Cross Green. This problem is most likely going to be exacerbated due to the significant infrastructure needed to support a 'new village' at Cross Green, which is currently devoid of community infrastructure to support new residents. Providing new infrastructure and associated community uses will impact on the economic viability of the proposals, the obvious response will be to increase property prices to help alleviate these costs on development whilst maintain a suitable profit margin. Given the provision of housing in this location is likely to not meet the needs of Black Country residents, RPS does not considers the proposals at Cross Green to be effective, and so not soundly-based.

A more appropriate response would be to allocate additional land at Featherstone, where housing affordability is more consistent with that of the Black Country and where there is greater probability that people currently residing in the Black Country will actually be able to purchase a home of their own in this part of the District. The site at Brookhouse Lane, being promoted by Persimmon Homes, represents an ideal opportunity to help address these problems.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.



Allocate additional land at Featherstone; Land east of Brookhouse Lane, promoted by Persimmon Homes should be preferred.

(Continue on a separate sheet /expand box if necessary)

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

**No**, I do not wish to participate in hearing session(s)

Yes

**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

RPS has raised specific issues and concerns through this representation that goes to the soundness of the SSLP and it is essential these concerns and the councils evidence is fully tested.



***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

**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.**

**Data Protection**

Your details will be added to our Local Plans Consultation database so that we can contact you as the review progresses. South Staffordshire Council will process your personal data in accordance with the Data Protection Act 2018 and the General Data Protection Regulations (GDPR). Our Privacy Notice can be viewed at <https://www.sstaffs.gov.uk/planning/strategic-planning--data-protection.cfm>

Please return the form via email to [localplans@sstaffs.gov.uk](mailto:localplans@sstaffs.gov.uk) or by post to South Staffordshire Council, Community Hub, Wolverhampton Road, Codsall, South Staffordshire WV8 1PX