



PLANNING AND DEVELOPMENT CONSULTANTS

## **A New Development Strategy for South Staffordshire 2018-2039 The Publication Plan (Regulation 19 consultation)**

1. In general terms, it is considered that the Council’s approach continues to place far too much emphasis on the “strategic development locations”, most particularly proposals SA2 (Cross Green) and SA3 (Linthouse Lane). It now appears that SA2 only “safeguards” the land for the potential rail-based parkway with no requirement for it to be provided (in contrast to previous Infrastructure Delivery Plan’s implicit indications). The release of green belt with assessed “very high” harm in this location appears to have far less justification now in the context of the proposed “infrastructure led” approach. Moreover, these large allocations put the delivery of a large part of the new housing requirement firmly in the hands of the larger developers, who will consequently potentially dictate supply. It is considered that the strategy should instead seek to deliver more growth around the edges of settlements in locations which are already sustainable and deliverable, such as in Bilbrook & Brewood.

2. Individual site representations have consistently been made throughout the local plan review process to support the allocation of sites at St. Mary’s Row, Brewood; land at Melrose, Brewood and land at Dam Mill, Bilbrook.– please see attached previous representations. These representations remain valid in the context of the Publication Plan and detailed explanations have not been provided as to how the sites have been evaluated.

3. In addition, it is noted that the proposed strategy does not allow for any new safeguarded areas of land. In accordance with paragraph 140 of the NPPF, the strategy should provide for further Green Belt release will be required beyond the plan period to meet future development requirements to meet needs. Safeguarded land should continue to be identified within the higher Tier settlements, including Bilbrook and Brewood.

4. Moreover, this emphasis on “*strategic development locations*” has meant that smaller sites adjacent to the conurbation have not been fully evaluated. One such site is at The Wergs, Wolverhampton where an individual site representation has been made consistently throughout the Review process – as attached.

5. In addition to the above, it is considered that some of the detailed development management policies (in particular those concerned with housing mix; housing density and public open space – HC1; HC2 and HC17) are far too prescriptive and will lead to developments of too similar character and blandness. There should be more flexibility built into the policies to allow for the individual circumstances of each site and its context.

6. In summary, the process that the Council has undertaken to arrive at the housing site allocation appears to have been self-fulfilling and has paid little regard to the merits of smaller and individual sites adjoining high Tiered settlements and the conurbation. The development of these sites has far less green belt harm than the larger allocations put forward in the plan and provide boundaries which will endure for the long term.