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Strictly Private and Confidential
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30 May 2024

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Dear Sir/Madam

**South Staffordshire Local Plan Publication Plan April 2024 Regulation 19 Consultation
Land off Primrose Close – 094 Wheaton Aston**

Thank you for the opportunity to submit this representation to South Staffordshire District Council's Local Plan Review consultation Regulation 19. This representation is made on behalf the owners of land off Primrose Close Wheaton Aston (the Land), Site reference 094 within SHELAA Locality 2 Table 2023 – see attached plan.

Bruton Knowles has previously submitted details of the Land into the first Local Plan Review Regulation 19 consultation. This representation relates to the second Regulation 19 consultation.

Site 094

The SHELAA identifies that the Land is potentially suitable for development subject to policy constraints – Open Constraints and also access adding this 'could be achieved from existing hammerhead.' A potential access solution(s) has been identified. The Land is also adjacent to the local school and the development boundary - it is therefore an excellent residential opportunity to support the school with reduced traffic movements from adjacent family accommodation. This development will not result in encroachment towards any settlement and the village envelope could be naturally extended to also include the adjacent school.

There are no known constraints, and the land is located Flood Zone 1 the lowest risk from flooding; it is not located within a Conservation Area. Finally, there are no other known environmental nor historical designations which affect the Land.

The scale of growth identified on the Land is also considered sustainable for a Tier 3 settlement. We also make the following additional comments:-



Housing

Draft Policy DS4 - Objection

Draft Policy DS4 says over the plan period up to 2041, the South Staffordshire District Council ('SSDC') will deliver a minimum of 4,726 homes between 2023-2041 with a proposed 640 dwellings contribution towards the unmet housing needs of the Greater Birmingham and Black Country Housing Market Area ('GBBCHMA'). This planned growth is a large reduction from the 9,089 dwellings being planned for in the previous Regulation 19 plan ('2022 Plan') and a contribution of 4,000 dwellings. We object to the level of housing growth being planned for and the Council's proposed change in their housing growth strategy for a number of reasons which we have detailed below.

The Plan seeks to reduce the amount of housing planned for in South Staffordshire as a reflection of the new NPPF. The new NPPF does not alter the fact that sufficient additional housing should be being planned for across the district in the most sustainable locations.

The revised plan does not justify the reduction in housing numbers nor identify how future housing need will be allowed for.

Draft Policy DS5 – Objection

The revised plan is correct to distribute of Housing across the district, however the level of housing proposed for tier 3 settlements is not supported and considered insufficient given such settlements provide facilities and services whose future needs to be supported by additional growth. For example, Wheaton Aston provides, two pubs, church and chapel, school adjacent to the subject site, bus routes to Stafford and Wolverhampton. Failing to provide additional growth undermines the sustainability of existing services and provision which is detrimental the settlements themselves.

Draft Policy SA3 – Housing Allocations – Objection

We consider that Land off Primrose Close – 094 Wheaton Aston should be included as a strategic development location, given it can provide future housing in a highly sustainable location adjacent to the school.

Modification

We request that Land off Primrose Close is included as an additional allocation and included as a strategic development location to deliver a mixture of private and affordable housing supporting in the process the adjacent school and other community facilities.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Ian Mercer'.

Ian R Mercer MRICS FAAV

Partner

RICS Registered Valuer