

REGULATION 18: SOUTH STAFFORDSHIRE COUNCIL LOCAL PLAN REVIEW – PREFERRED OPTIONS

SOUTH STAFFORDSHIRE LOCAL PLAN

LAND AT BRATCH COMMON ROAD, WOMBOURNE

RESPONSE ON BEHALF OF ST PHILIPS

TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED) PLANNING AND COMPULSORY PURCHASE ACT 2004

Prepared by: Pegasus Group



Pegasus Group

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1.0 Introduction

1.1 These representations are submitted by Pegasus Group on behalf of St Philips Limited in respect of their land interests at Bratch Common Road, Wombourne, identified on the Plan at **Appendix 1**.

1.2 St Philips has submitted representations to the Issues and Options and the Spatial Housing Strategy and Infrastructure Delivery consultation in October 2019. A copy of the previous representations submitted is at **Appendix 2** and a copy of a Vision Document showing how the land interests at Bratch Common Road could be developed is enclosed at **Appendix 3**. The land extends to 28 hectares to the northwest of Wombourne ('the Site'). The Site is identified on the Location Plan (Drawing No. 9000 Rev A) at **Appendix 1** and is being promoted as a residential development for up to 250 dwellings. The site is Council reference 554 in the documentation published as part of the Local Plan consultation.

1.3 The representations are structured to respond to the questions set out on the online consultation response form. They also make specific reference to the tests of soundness for plan-making set out at para 35 of the National Planning Policy Framework (NPPF). Specifically, these representations seek to test the Preferred Options in terms of whether they are:

*"a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*

*b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*

*c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*

*d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework."*

1.4 The representations have had regard to the published consultation document and questions set out therein, accompanying published evidence and the national and local planning policy context.

1.5 These tests of soundness, along with other legal and procedural requirements associated with the Plan-making process provide a contextual framework for these representations.

Scope of Consultation

1.6 The Preferred Options consultation document seeks views on a number of specific questions, as set out within the document itself.

The representations are structured such that they respond to the Questions identified in the Council's Preferred Options Local Plan document.

2.0 The Site – Bratch Common Road, Wombourne

- 2.1 St Philips have been promoting their land interests at Bratch Common Road since 2018 and has made appropriate representations to the earlier stages of the South Staffordshire Local Plan review as noted above.
- 2.2 St Philips has taken into account the Site's location in the Green Belt and the requirement to demonstrate exceptional circumstances in relation to the release of land from the Green Belt for residential purposes through the Local Plan. The land at Bratch Common Road has previously been considered to have potential to accommodate residential development in the Council's Strategic Housing Land Availability Assessment, and the Council's Green Belt review (LUC, 2019) has already considered the land in terms of its contribution to the purposes of including land in the Green Belt. A master planned approach has been developed for the Site, showing how it can be released for residential development whilst protecting the wider Green Belt and not eroding the reasons for the wider land being within the Green Belt.
- 2.3 Bounded by Bratch Common Road and Trysull Road on its southern and eastern boundaries, the north and western edges are adjacent to open countryside beyond. The Site comprises two agricultural fields with field boundaries defined by hedgerows and tree lines. A public right of way runs along the southern and eastern edge of the site, and the Site is immediately adjacent to the settlement of Wombourne, sitting alongside its north western boundary.
- 2.4 As set out in the Vision Document (**Appendix 3**), St Philips has undertaken detailed background research work to assess the Site with reference to accessibility, landscape, on-site features and landform, heritage and archaeology, ecology, drainage, noise, air quality and utilities. The Design Principles set out in the Vision Document show how the Site could accommodate residential development that would integrate with the existing settlement and provide approximately 250 new homes whilst retaining the edge of village feel and protecting the Green Belt beyond the Site.
- 2.5 St Philips are also keen to ensure that any development integrates into its context and not only meets housing need but also supports local infrastructure and creates a development that can integrate into the local community. They have already sought to engage with both Trysull and Seisdon and Wombourne Parish Councils on the proposed development of the Site. Whilst Covid-19 prevented any formal meetings occurring, further contact could be made with both parties as required.
- 2.6 The Site is located approximately 2.5km to the north-west of Wombourne Village centre, equating to approximately a 20-25 minute walk to the centre of the village. The Site is well located to key services and amenities/facilities including Ounsdale High School within 800m, and Westfield Primary School within 1.2km.

3.0 Q1: Do you agree that the evidence base set out in Appendix A is appropriate to inform the new Local Plan? Yes/No. Please provide comments on the content or use of the evidence base set out in Appendix A, referencing the document you are referring to

3.1 There is no in principle objection to the scope of the evidence base identified in Appendix A, but it is considered to be incomplete when considered against the documents available on the Council's website as the 'Local Plan Review Evidence Base'. The documentation available on the website should be reflected in any definitive Evidence Base list.

3.2 Further, concern is raised that the Greater Birmingham HMA (GBHMA) Strategic Growth Study and the Strategic Housing and Employment Land Availability Assessment ('SHELAA') are not included, although it is noted that an updated SHELAA (2021) is available on SSDC's website. It is therefore assumed that its omission from Appendix A is a typographical error.

3.3 Notwithstanding, the GBHMA Strategic Growth Study, which the Council are seeking to rely on to justify the proposed housing numbers, is a key aspect of the Local Plan Review evidence base and will be a crucial piece of evidence in the context of South Staffordshire District.

Sustainability Appraisal (SA)

3.4 Section 29 of the Town and Country Planning Act 1990 (As amended) requires Local Plans and Supplementary Planning Documents to be prepared with a view to contributing to the achievement of sustainable development. A Sustainability Appraisal is one way of helping fulfil this duty through a structured appraisal of the economic, social and environmental sustainability of the plan. In accordance with para 32 of the NPPF, the production of a SA is one of the "tests of soundness" on a Local Plan/SPD.

3.5 Further guidance on the preparation of the SA in relation to the stages of Local Plan production together with the information to be covered within the SA Report is set out in the Planning Policy Guidance (PPG) dated March 2014 (as amended). The PPG states at paragraph 11-009 that the Sustainability Appraisal should "focus on the environmental, economic and social impacts that are likely to be significant."

3.6 The guidance goes on to states at paragraph 11-018 that "The sustainability appraisal must consider all reasonable alternatives and assessed them in the same level of detail as the option the plan makers proposed to take forward in the Local Plan (the preferred approach)."

3.7 The SA produced by the Council has some anomalies in assessment, as set out later in these representations, with reference to some site-specific assessments which are incorrect, and which mean that the Council has not considered all reasonable alternatives in the appropriate context.

4.0 Q3: a) Have the correct vision and strategic objectives been identified? b) Do you agree that the draft policies (chapters 4 and 5) and the policy directions (Chapter 6) will deliver these objectives? Yes/No

4.1 Whilst the Vision is succinct, it is not considered to be locally relevant and contains no spatially specific elements. It also seeks to 'protect and enhance' the District as it currently exists, rather than thinking forward and considering how the Local Plan can encourage growth for the benefit of the District as a whole.

4.2 The Local Plan lacks clarity in the definition of exceptional circumstances for release of Green Belt land as part of its strategy. The Paper should make it clear that the need to identify land for growth and development over the Plan period, and beyond, means that there are exceptional circumstances arising which have required a full and detailed Green Belt boundary review, with a view to identifying land that it is proposed to be released from the Green Belt to meet the District's growth requirements.

4.3 Strategic Objective 1 should include reference to the requirement to undertake a complete review of the Green Belt with the view to releasing that land in exceptional circumstances, and in particular to meet the housing needs of the plan period.

4.4 Notwithstanding, the strategic objectives identified are broadly supported.

5.0 Q4: Do you support the policy approach in Policy DS1 – Green Belt and Policy DS2 – open Countryside? Yes/No. If no, please explain how these policies should be amended?

- 5.1 **The approach taken in this development strategy is not supported.** The wording of the text implies that a Green Belt designation directly contributes to the 'district's rural character'. This may lead one to assume that the Green Belt is a landscape designation. This is incorrect, as it is not the purpose of Green Belt to be landscape protection. It is instead a policy designation, applied with the intention of preventing urban sprawl, not to protect rural character.
- 5.2 **Paragraphs 4.2, 2.3 and 4.4 of the Development Strategy also fail to mention that the Council must be relying on exceptional circumstances to have undertaken a Green Belt boundary review to inform the Preferred Options Local Plan.** To be effective, the Council must demonstrate exceptional circumstance justifying the release of land from the Green Belt in accordance with para 140 of the NPPF which states that *"Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period."*
- 5.3 Further, Policy DS1 references Green Belt designations, identified on the Proposals Map. This part of the policy and its soundness must be addressed in the context of the other matters which the plan must take into consideration, including the need to release further Green Belt to address unmet residential need over the Plan period and potentially beyond, and the need to amend Green Belt boundaries on the Policies Map to reflect such land releases, in accordance with NPPF para 140 as referenced above.
- 5.4 The Green Belt is tightly drawn around existing settlements within the South Staffordshire area. In proposing options for future development, where the most sustainable form of development is likely to be around existing settlements, it is therefore **imperative that the Local Plan comprises a detailed Green Belt review, to ensure that development needs beyond the Plan period can be met.**

6.0 Q5: Do you support the policy approach in Policy DS3 – The Spatial Strategy to 2038? Yes/No. If no, please explain how this policy should be amended?

6.1 There is no in principle objection to the proposed Spatial Strategy for the delivery of growth and development set out in Policy DS3, which seeks to deliver growth and development in the most sustainable locations.

7.0 Q6: Do you support the policy approach in policy DS4 – Longer Term Growth Aspirations for a New Settlement? Yes/No. If no, please explain how this policy should be amended?

7.1 Policy DS4, proposing a longer term 'New Settlement' is considered unsound as it is not justified at the present time. It is currently only at an 'options' stage as set out in the first paragraph of the draft policy. It must be considered in more detail and be fully evidenced if it is to form a policy in the emerging Local Plan.

7.2 For example, whilst the draft Policy wishes to consider a new settlement, it is considered there are locations around existing settlements that could accommodate such growth. For example, there are other land options around Wombourne that could meet such need, and which would likely cause less harm to the landscape and openness of the Green Belt than a large strategic new settlement.

7.3 Our client's land at Bratch Common Road has been identified in the Council's own evidence base (LUC Green Belt Study, 2019, sub-parcel S53Cs3, page 612) as causing low-moderate harm to the Green Belt and having a low-moderate impact on the landscape. Development would enhance the sustainability of the village and include the provision of additional infrastructure that would, with reference to the Council's Rural Services and Facilities Audit 2019, assist in improving access to places of employment or NHS services via public transport, to deliver additional community infrastructure for the village.

7.4 In addition, with reference to the NPPF para 138, the purposes of including land within the Green Belt would not be harmed by the removal of the land at Bratch Common Road for development:

a) To check the unrestricted sprawl of large built-up areas: Development of the land at Bratch Common Road would not cause any lessening of the gap between Wombourne and the western edge of the Black Country.

b) To prevent neighbouring towns merging into one another: Development of the Site would not result in Wombourne being any nearer to Wolverhampton, Kinver or Bridgnorth than its current extents.

c) To assist in safeguarding the countryside from encroachment: Development of the land at Bratch Common Road could provide a strong and defensible boundary to the edge of the settlement, to define it from the Green Belt beyond in such a way that its boundaries would remain in place beyond the end of the Plan period.

d) To preserve the setting and special character of historic towns: Development of the site would have no impact upon any identified historic town, or indeed on any identified heritage asset.

7.5 The Plan, as drafted, purports the idea of a potential New Settlement in the longer term, but there is no specific location for the settlement, it has not formed part of the evidence base and Sustainability Appraisal and has not been fully justified for the purpose of the Preferred Options. The Policy should therefore be deleted.

8.0 Q8: Do you support the proposed housing allocations in Policy SA5? Yes/No. Please reference the site reference number (e.g. site 582) for the site you are commenting on in your response.

- 8.1 The principle of additional development in Wombourne being pursued to deliver housing need requirements is supported. However, allocations at Smallbrook Lane and Gilbert Lane are questioned in terms of whether they are sound allocations, based on an appropriate site selection.
- 8.2 In particular, land at Gilbert Lane and Billy Bunns Lane (Allocation ref: 463 and 284) are not considered sound when considered against the evidence base and harm that has been identified as a result of the release of the land from the Green Belt and its identification for development.
- 8.3 The Housing Site Selection Paper (2021) sets out detailed commentary on the Proposed Housing Site Allocations set out at Policy SA5 of the draft Preferred Options Local Plan. The 'moderate-high' landscape sensitivity of the proposed site allocations are identified (which is a result of the Site's visual prominence as set out in the Landscape Sensitivity Study) but the site is considered to be suitable for development based on its sustainability characteristics, being in proximity of local schools and also significantly closer to the village's centre than other sites around the village.
- 8.4 There are other sites around Wombourne, which could deliver the required levels of development whilst causing less environmental harm. The site at Bratch Common Road has been identified as having a Low-Moderate landscape sensitivity to development and the Vision Document (Appendix 3) confirms that the site is well related to the existing settlement of Wombourne.
- 8.5 Further, contrary to the comments at Appendix 25 of the Housing Site Selection Topic Paper, the Bratch Common Road site is able to provide suitable highways access. There is an opportunity to widen Bratch Common Road, which would improve highway safety, facilitate pedestrian movement could unlock future development within the wider Wombourne area. The proposed development of the site would also provide a pedestrian footway on Bratch Common Road, which currently doesn't exist. Further, access improvements to local amenities can be delivered through improvements to the local Public Rights of Way Network and via the proposed pedestrian/cycle infrastructure, which facilitate movement between the site and local amenities. As set out above the Site is within 800m of both a secondary school and approximately 900 metres of two primary schools. The minor distance outside the recommended distances are not considered to amount to a minor negative impact, rather the distance would be a minor positive impact or at worst a neutral impact when considered against Objective 11 of the SA. The distances to local facilities from the site at Bratch Common Road are shown on the Local Movement and Facilities plan on page 13 of the Vision Document at Appendix 3.
- 8.6 The Council's Sustainability Appraisal (SA) identified that the Site would have a Major Negative Impact on Climate Change Adaptation as it is in part in an area at high risk of surface water flooding. However, the existing surface water flows can be accommodated on the site and ground re-profiling can mitigate surface water flooding concerns and will ensure that the drainage design for the proposed development provides betterment in terms of surface water management. This need not be a major negative impact and could be a neutral impact.
- 8.7 With those points in mind, the land at Bratch Common Road would perform better than the proposed allocations at Gilbert Lane and Billy Buns Lane when considered against the Objectives set out in the Sustainability Appraisal and should be a preferable site for development. Whilst it may be further from some local amenities that are measured by the SA it would result in less landscape impact which should make it a preferable site for development due to lower environmental impacts than would arise from the proposed site allocations.

9.0 Q11: Do you agree with the proposed policy approaches set out in Chapter 6? Yes/No. If no, then please provide details setting out what changes are needed, referencing the Policy Reference number (e.g. HC1 – Housing Mix)

9.1 In response to Question 11, we have set out below detailed comments with regard to the proposed development management policies and their proposed direction of travel of the Paper.

Policy HC1 – Housing Mix

9.2 This policy should be worded to allow for flexibility in its application, such that developments may be allowed with different mixes, where the proposed mix on that occasion would work better for the local market. The policy should therefore be amended to allow flexibility in the delivery of a mix of market dwellings, such that if the evidence base changes the mix in provision can be altered without causing conflict with that part of the policy, allowing the Plan to be flexible and adaptable to changing circumstances.

Policy HC3 – Affordable Housing

9.3 The use of the word 'major residential development' in this context requires a definition to save confusion about the size of development at which affordable housing becomes a requirement. In Policy HC1 – Housing Mix, the terminology 'major residential development' is defined in a footnote. The absence of a guiding footnote/definition in Policy HC3 suggests that there may be no definition for 'major residential development' in the context of affordable housing and thus leaving it open to discussion later in the planning process.

9.4 The policy also needs to ensure that evidence is provided when considering viability, especially when looking at brownfield sites.

9.5 These comments also query whether grant funding is actually a matter for the Local Plan to consider, as each site should be considered on its own merits in terms of whether grant funding is applicable to each site.

Policy HC9 – Design Requirements

9.6 The provision of tree lined streets should be subject to highway authority agreement.

9.7 The point on house types and tenures is repetition of Policy material discussed in Policies HC1 – Housing Mix and HC3 – Affordable Housing and is unnecessary.

9.8 The requirement of a Design and Access Statement within this Policy is also unnecessary as this is a national, statutory requirement and therefore mention at a local level is not needed.

9.9 The Policy requirement to comply with the implementation of the Nationally Described Space Standards (NDSS) is generally supported. However, some flexibility must be allowed in its application as occasionally one or two dwellings on larger sites may require non-compliance with NDSS for urban design reasons. This leniency should be applied to limited exceptions that are thoroughly reasoned.

10.0 Q12: a) It is proposed that the fully drafted policies in this document (Policies DS1-DS4 and SA1-SA7) are all strategic policies required by paragraph 21 of the NPPF. Do you agree these are strategic policies? Yes/No. b) Are there any other proposed policies in Chapter 6 that you consider should be identified as strategic policies? Yes/No If yes, then please provide details including the Policy Reference (e.g. HC1 – Housing Mix)

10.1 There is no objection to those policies that are proposed to be strategic policies for the purposes of the Plan as they are considered to be strategic in their nature.

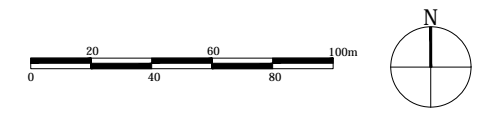
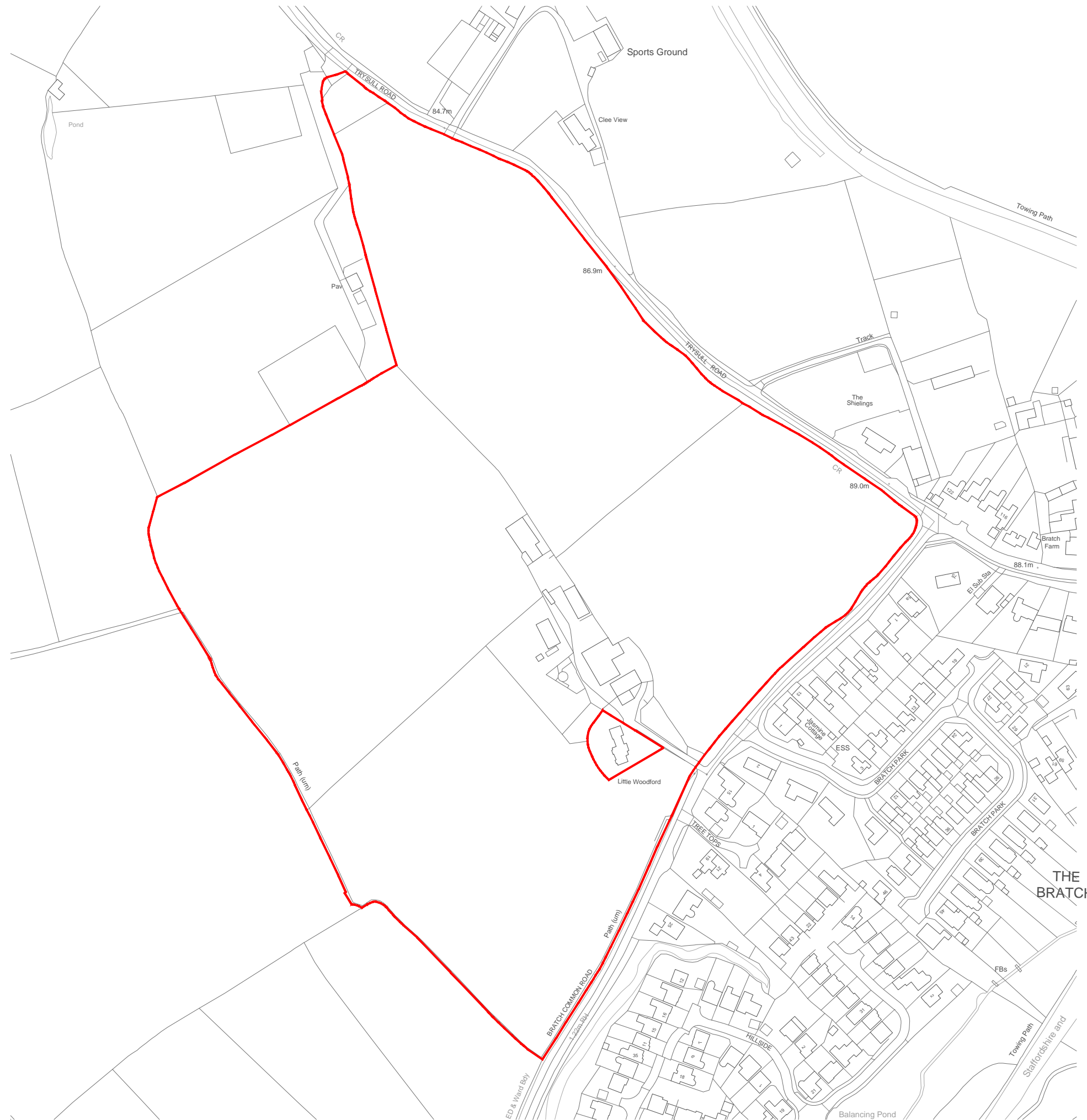
APPENDIX 1

The scaling of this drawing cannot be assured

Revision	Date	Drn	Ckd
A Little Woodford removed from site boundary	03.08.18	EMB	CDB

LEGEND

 Site Boundary
 12.71 Ha



Project
Bratch Common Road
Wombourne

Drawing Title
Site Boundary Plan

Date	Scale	Drawn by	Check by
20.07.18	1:2500 @ A3	KU	EB
Project No	Drawing No	Revision	
29042	9000	A	



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APPENDIX 2



Local Plan Review Consultation Response Form

Part A: Your Details (Please Print)		
Please ensure that we have an up to date email address 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		
Job Title (if applicable)		
Organisation (if applicable)		
Address		
Post Code		
Telephone Number		

The South Staffordshire Local Plan review Issues and Options document is being consulted on for a period of 8 weeks from Monday 8 October to 5pm Friday 30 November 2018. For advice on how to respond to the consultation, and how to fill in this form please see the guidance notes on the Council's website at: www.sstaffs.gov.uk/localplanreview or call 01902 696000.

Please note:

- Comments must be received by **5pm on Friday 30 November 2018**. Late comments will not be duly made under the Regulations.
- Please fill in a separate Part B for each paragraph/table/topic you are commenting on
- Please explain your response where necessary

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.

Part B: Please complete a new Part B for each representation you wish to make.

Name:

Organisation:

- 1. Which part of the Local Plan review Issues and Options consultation paper does this representation relate to?**

Chapter	
Paragraph	
Table	
Question (if applicable)	
Other document eg SA, HRA	

- 2. Please set out your comments below**

(Continue on a separate sheet and attach if necessary)

All comments should be made in writing preferably using this form and should be made no later than 5pm Friday 30 November 2018.

You can view the documents online at www.sstaffs.gov.uk/localplanreview

Contact:

Email the form to: localplanreview@sstaffs.gov.uk

Or send by post to: Strategic Planning Team, South Staffordshire Council, Council Offices,
Wolverhampton Road, Codsall, South Staffordshire, WV8 1PX.

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>

South Staffordshire Local Plan Review

Response to Issues and Options

On Behalf of St Philips and Landowners at Bratch Common Road, Wombourne

November 2018

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Prepared By: Laurence Holmes MTCP (Hons) MRTPI

Status: FINAL

Draft Date: November 2018

For and on behalf of GVA Grimley Limited

1. Introduction

- 1.1 GVA is instructed by St Philips Limited (hereafter 'St Philips') to make representations to the Issues and Options consultation for the South Staffordshire Local Plan Review 2018 – 2037 ('Local Plan Review'). The representations are tailored to the questions posed by the consultation document, where relevant and pertinent to St Philips' promotion of land at Bratch Common Road, Wombourne ('the site') for residential development. Where responses to specific questions are not provided, St Philips' position should be considered neutral.
- 1.2 By way of background, the site comprises 12.71 ha of land which is currently in agricultural use and adjoins the north-western settlement boundary of Wombourne. To date, the majority of the site has been promoted through the Council's Strategic Housing and Employment Land Availability Assessment (SHELAA); the latest version, published in 2018, identifies this land under reference 554.
- 1.3 St Philips wishes to work collaboratively with the Council in securing the sustainable development of the site through an allocation within the Local Plan Review. The response to this first stage of the consultation draws upon the planning merits of allocating the site in the context of the addressing wider matters which are identified within the consultation document.
- 1.4 This response should be considered in conjunction with the supporting Vision Document which has also been submitted to the Council. The submission demonstrates how the site could be sensitively developed to help meet the District's housing requirements over the emerging plan period.
- 1.5 The Vision Document demonstrably sets out the site's sustainability credentials and examines its ability to accommodate development of approximately 250 residential dwellings without giving rise to significant environmental or highway related impacts.
- 1.6 St Philips' response to this consultation is submitted constructively to ensure that the plan is positively prepared and that its policies are effective and justified, being founded upon up-to-date and robust evidence. In the context of meeting housing need – a national issue which remains at the forefront of the Government's planning agenda – it will be critical that the Council is fully engaged with the other local planning authorities whose administrative areas collectively form the Greater Birmingham Housing Market Area (GBHMA).
- 1.7 The above must ultimately be borne out by a plan which delivers a fair and reasonable proportion of the unmet housing need expected to arise from elsewhere within the GBHMA, in addition to the District's own objectively assessed need. This is addressed in further detail in **Section 2**.

2. Level of Growth

2.1 St Philips' responses to questions (6), (7), (8), (9) and (10) identified within Section 4 of the consultation document, are provided herewith.

Q6. Do you agree that Option C represents an appropriate and proportionate housing target for the Local Plan review, having regard to the Council's own needs and the needs of the wider Greater Birmingham Housing Market Area?

2.2 At the outset, it is important to acknowledge the Government's position that the standard methodology for calculating housing need is under review; this is due to concern that the 2016 household projections – issued on 20th September 2018 – do not recognise 'pent up demand' resulting from a lack of house-building over a prolonged period¹.

2.3 The review is currently the subject of consultation on wider revisions to the NPPF, the outcome of which is expected to be the publication of a revised Standard Method in 2019. Paragraph 19(1) of the consultation advises that, during the intervening short-term period, that local authorities' housing need should be calculated using the 2014 household projections as a demographic baseline².

2.4 In light of the Government's updated advice, the starting position for calculating the average household growth over a 10-year period for South Staffordshire is to apply the 2014 household projections. Performing the 3-step process set out on p.24-25 of the Issues and Options consultation document, and consistent with government guidance³, results in a requirement for the District of 291 dwellings per annum. When applied to the prescribed plan period (2018 – 2037), this equates to a requirement of 5,529 dwellings.

2.5 The above approach has also been applied in calculating the housing need of the Black Country authority areas, with which South Staffordshire shares tangible migration and commuter flow patterns. This has been aligned with the Black Country Core Strategy Review plan period and compared with the latest housing land supply position, as set out in **Table 3.1** below:

Table 3.1: Black Country Housing Need and Supply Position (2017 – 2036)

Local Authority	Housing Need (2017 – 2036) Standard Method - 2014 Household Projections (per annum)	Total Supply (2017 – 2036)*	Housing Need minus Supply (2017 – 2036)
Wolverhampton	13,965 (735)	12,087	-1,878
Dudley	11,533 (607)	14,812	+3,279
Sandwell	27,284 (1,436)	16,146	-11,138
Walsall	17,271 (909)	8,928	-8,343

*Supply position derived from Table 4 of Black Country Urban Capacity Review (May 2018)

2.6 Whilst the Issues and Options consultation document makes reference to the wider shortfall for the Greater Birmingham HMA which was identified in the HMA Strategic Growth Study (February 2018), policy options for

¹ Kit Malthouse – Planning and Housing Minister, 4th October 2018

² 'Technical consultation on updates to national planning policy and guidance', October 2018

³ Housing Need Assessment PPG, September 2018, paragraph 004 (Ref ID: 2a-004-20180913)

addressing cross-boundary unmet need (Options B, C and D) do not appear to be informed by a sound methodology or, moreover, dialogue with the relevant HMA authorities.

- 2.7 Rather, the options are based on arbitrary assumptions as to the proportion of unmet need that the District could potentially accommodate. This is compared with past delivery rates taken over a 22-year period in identifying Option C as a preferred requirement.
- 2.8 There needs to be greater clarity, through exercising the duty to co-operate, in determining an appropriate apportionment of cross-boundary unmet need over the plan period. An appropriate methodology for determining the apportionment of unmet need – endorsed by Local Plan inspectors – would be informed by commuting flows and migration patterns between the District and relevant authorities of the Greater Birmingham HMA.
- 2.9 GVA’s analysis of commuter flows with South Staffordshire using ONS datasets⁴ has identified that the District has a strong relationship with all four of the Black Country authority areas. For the purposes of determining the level of unmet need arising from each authority which could be accommodated in South Staffordshire, total commuter flows with the District are expressed as a percentage of the total flows recorded across all principal inflow and outflow areas. This excludes those areas such as Birmingham and the other Black Country authorities which are unable to accommodate additional unmet need. This is set out in **Tables 3.2 to 3.5** below and overleaf.

Table 3.2: Commuter flows to and from Wolverhampton

Local Authority Area	Flows into Wolverhampton	Flows out of Wolverhampton	Total	Percentage of Total
South Staffordshire	10,381	4,448	14,829	54%
Shropshire	2,346	1,085	3,431	12%
Telford and Wrekin	1,770	2,462	4,232	15%
Cannock Chase	1,567	928	2,495	9%
Stafford	1,146	594	1,740	6%
Lichfield	632	294	926	3%
Total	17,842	9,811	27,653	100%

*Percentages rounded.

Table 3.3: Commuter flows to and from Dudley

Local Authority Area	Flows into Dudley	Flows out of Dudley	Total	Percentage of Total
South Staffordshire	3,736	2,333	6,069	33%
Wyre Forest	2,473	1,924	4,397	24%
Bromsgrove	1,899	1,937	3,836	21%
Shropshire	1,143	658	1,801	10%
Wychavon	503	622	1,125	6%
Telford and Wrekin	458	693	1,151	6%
Total	10,212	8,167	18,379	100%

*Percentages rounded.

⁴ ONS, Census WU03UK – Location of usual residence and place of work by method of travel to work.

Table 3.4: Commuter flows to and from Sandwell

Local Authority Area	Flows into Sandwell	Flows out of Sandwell	Total	Percentage of Total
South Staffordshire	1,894	545	2,439	24%
Bromsgrove	1,328	643	1,971	19%
Solihull	909	1,511	2,420	24%
Wyre Forest	902	321	1,223	12%
Cannock Chase	771	314	1,085	11%
Lichfield	691	347	1,038	10%
Total	6,495	3,681	10,176	100%

*Percentages rounded.

Table 3.5: Commuter flows to and from Walsall

Local Authority Area	Flows into Walsall	Flows out of Walsall	Total	Percentage of Total
South Staffordshire	3,876	1,746	5,622	28%
Cannock Chase	3,855	2,243	6,098	30%
Lichfield	3,197	2,311	5,508	27%
Stafford	713	461	1,174	6%
Telford and Wrekin	543	571	1,114	5%
Shropshire	504	227	731	4%
Total	12,688	7,559	20,247	100%

*Percentages rounded.

- 2.10 A similar approach is then taken to assess patterns of migration from the four Black Country authority areas to the District and other principal local authority areas using mid-2017 datasets⁵. This is set out in **Tables 3.6 to 3.9** below and overleaf.

Table 3.6: Migration flows from Wolverhampton

Local Authority Area	Inflows from Wolverhampton	Percentage of Total
South Staffordshire	1,373	50%
Shropshire	505	18%
Telford and Wrekin	447	16%
Cannock Chase	180	7%
Stafford	157	6%
Lichfield	76	3%
Total	2,738	100%

*Percentages rounded.

⁵ ONS: 'Internal migration: detailed estimates by origin and destination local authorities, age and sex', 28th June 2018

Table 3.7: Migration flows from Dudley

Local Authority Area	Inflows from Dudley	Percentage of Total
South Staffordshire	829	34%
Wyre Forest	506	21%
Bromsgrove	438	18%
Shropshire	356	15%
Wychavon	127	5%
Telford and Wrekin	162	7%
Total	2,418	100%

*Percentages rounded.

Table 3.8: Migration flows from Sandwell

Local Authority Area	Inflows from Sandwell	Percentage of Total
South Staffordshire	337	28%
Bromsgrove	265	22%
Solihull	178	14%
Wyre Forest	202	17%
Cannock Chase	126	10%
Lichfield	115	9%
Total	1,223	100%

*Percentages rounded.

Table 3.9: Migration flows from Walsall

Local Authority Area	Inflows from Walsall	Percentage of Total
South Staffordshire	674	27%
Cannock Chase	631	25%
Lichfield	636	25%
Stafford	182	7%
Telford and Wrekin	195	8%
Shropshire	198	8%
Total	2,516	100%

*Percentages rounded.

- 2.11 A mid-point of the respective percentages for the District is then taken and applied to those Black Country authority areas for which unmet need has been identified for the plan period (identified in Table 3.1). This is set out in **Table 3.10** and determines the proportion of unmet need which the District should seek to accommodate.

Table 3.10: Apportionment of unmet need arising from Black Country to South Staffordshire District

Local Authority Area	Total Commuter Flow %	Migration Inflow %	Mid-Point %	Proportion of Unmet Need (Dwellings)
Wolverhampton	54%	50%	52%	977
Sandwell	24%	28%	26%	2,896
Walsall	28%	27%	28%	2,336
Total	–	–	–	6,209

*Figures rounded.

- 2.12 Applying the above methodology would require the District to accommodate 6,209 dwellings for the plan period to help address the cross-boundary shortfalls. When the District's objectively assessed need is taken into account, the aggregate requirement for the plan period would be **11,738** dwellings.
- 2.13 Whilst the Council's acknowledgement of and willingness to address the issue of cross-boundary unmet need is welcomed and necessary for ensuring that the duty to cooperate is complied with, the requirement of 9,130 dwellings identified in Option C stops short of meeting the anticipated actual requirement. The requirement will need to be sufficient to meet address unmet need arising from those parts of the Greater Birmingham HMA with which the District has demonstrable and tangible relationships.
- 2.14 As currently presented, Option C would be neither justified (given the absence of clear supporting evidence) or effective (cross-boundary housing need would not be fully met) for the purposes of finding the Local Plan Review sound.

Q7. Are there any other options to consider, including a different housing requirement not included in the range of options above? If so, what evidence is there to support your option?

- 2.15 The analysis set out in St Philips' response to question 6 provides a logical and robust methodology for determining a total housing requirement for the plan period of 11,738. This would equate to an average of 618 dwellings per annum. This exceeds the requirement proposed by Option C, but falls significantly short of those identified by Options D and E. It is therefore submitted that a preferred option of 11,738 be taken forward through the Local Plan Review, subject to any amendment which may be required as a result of the Government's forthcoming revisions to the Standard Method.

Q8. Is the plan period of 2018 – 2037 an appropriate response to the Government's guidance on meeting housing needs? Should we consider an alternative plan period?

- 2.16 Yes. Paragraph 22 of the NPPF makes clear that strategic policies should assume a minimum period of 15 years from the plan adoption date. At 19 years, the proposed plan period would enable greater flexibility to achieve the necessary housing delivery within the District, which may be aided by agreement of a stepped trajectory. It is also in general alignment with the HMA Strategic Growth Study, which forecasts housing need up to 2036. The length of plan period does not negate the need for the Council to undertake five-yearly reviews of strategic policies and for the Local Plan to be updated where necessary⁶.

Q9. The NPPF requires us to approach all neighbouring authorities before releasing Green Belt for unmet housing needs and to plan for cross-boundary needs over the most appropriate functional geography. In light of this, is the Greater Birmingham Housing Market Area the most appropriate geography over which [to assess cross-boundary need]?

- 2.17 As acknowledged by paragraph 4.7 of the Issues and Options consultation document, the Greater Birmingham HMA has been endorsed by the Secretary of State in testing the soundness of the Birmingham Development Plan in 2017. It is agreed that there is functional containment within the HMA in terms of migration and commuting patterns.

⁶ NPPF 2018, paragraph 33

- 2.18 As illustrated in GVA's analysis provided in response to question 6, the District has a particularly strong influence on the four Black Country authorities. This is borne out in relatively high levels of incoming migration flows from areas such as Wolverhampton, as well as notable patterns of out-commuting, with a sizable number of people who work in the Black Country choosing to live in the District.
- 2.19 By contrast, outer-lying areas such as Shropshire show comparatively low levels of migration and commuter flows with the Black Country and Birmingham. It is unlikely that such areas, which lie outside of the functional HMA, could sustainably accommodate significant levels of need arising from within the HMA. In light of this, the Greater Birmingham HMA is considered to be the most appropriate geography over which to assess (and meet) cross-boundary need.

Q10. Should the Council identify additional safeguarded land through the new Local Plan? If so, how much should be identified? Is there an alternative approach that the Council could take?

- 2.20 Paragraph 139(c) of the NPPF enables local authorities to identify areas of safeguarded land when reviewing Green Belt boundaries, which can be done where there are longer-term development needs which exceed the plan period. Given the anticipated housing requirement and the need to deliver a significant number of new homes within the District, the Council should mitigate the risk that some large strategic site allocations may not deliver in their entirety within the plan period. This can be achieved by identifying additional sites for safeguarding until such time that the plan is reviewed and updated.

3. Locations for Growth

3.1 St Philips' responses to questions (17), (18) and (19) identified within Section 5 of the consultation document, are provided herewith.

Q17. Should the Council introduce a minimum density standard of 35 dwellings per hectare on all housing sites? If not, what factors should the Council consider when considering setting minimum density standards?

3.2 The NPPF does not compel local planning authorities to setting a minimum density standard for all residential developments. Whilst paragraph 123(a) of the NPPF advises that such standards should be imposed in respect of urban sites that are well-served by public transport connections, part (b) acknowledges the potential for a range of density standards to be applied in respect of other sites, having regard to their accessibility.

3.3 Whilst St Philips endorses the need for development to be optimised on all sites, it is important that any planned approach does not require slavish adherence to a district-wide minimum density standard. It is important that the Council's approach to setting density requirements is fully informed by robust evidence as to the capacity and deliverability of suitable sites.

3.4 The above should be obtained through a rigorous SHLAA process, so that site-specific constraints which may limit capacity (and therefore density levels), are heeded and appropriately addressed.

3.5 As demonstrated through the accompanying Vision Document and suite of technical information, land being promoted for residential development at Bratch Common Road in Wombourne could achieve a minimum density of 35 dwellings per hectare. This would ensure that the envisaged development could be sensitively delivered without giving rise to significant adverse impact on environmental receptors.

Q18. Are the Council's revised Rural Settlement Hierarchy and the Rural Settlement Hierarchy Study (2018) robust and consistent with national policy?

3.6 The proposed Rural Settlement Hierarchy for the Local Plan Review must be considered with caution, as it does not appear to take into account the ability for development to increase the sustainability of some settlements. Moreover, the proposed 5-tier approach to the settlement hierarchy – based wholly on a rigid set of criteria – implies the basis upon which the Council will seek to apportion housing growth within the District.

3.7 The NPPF is clear, through paragraph 72, that large numbers of new homes can be achieved through significant extensions to existing villages and towns, where they are well located and supported by the necessary infrastructure and facilities. Part (b) of paragraph 72 states that local authorities, when seeking to identify appropriate locations for growth, should:

"ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself... or in larger towns to which there is good access."

- 3.8 The NPPF stops short of defining what is meant by 'sufficient'; this must be a matter of judgement for the policy-maker, amongst other matters for consideration when determining where growth should be accommodated.
- 3.9 With the NPPF's advice in mind, the decision to depart from the 3-tier approach of the Core Strategy – 'Main', 'Local' and 'Small Service' villages – and apply a more detailed settlement hierarchy is considered an overly complicated and not necessarily robust approach. For example, there are instances where some settlements, by virtue of their general characteristics and location, should not be distinguished from other settlements which are not substantially different in sustainability terms but afforded a higher tier rating.
- 3.10 By way of example, Wombourne has been identified as a Tier 2 settlement principally as a result that it does not have a railway station. On this basis, the Rural Services and Facilities Audit has downgraded Wombourne's score against access to employment locations⁷. This more rigid approach assumes a secondary role for Wombourne, notwithstanding its current status as one of Main Service villages in the extant statutory development plan.
- 3.11 This approach disregards the other public transport links available which provide a good level of connectivity with employment locations, namely those in the Black Country, and Wombourne's proximity to such locations, relative to that of the settlements currently identified under Tier 1. It also disregards the ability for improvements to be identified through the Infrastructure Delivery Plan (IDP) to increase general accessibility levels within the settlement.
- 3.12 It is submitted that, on the basis of its high level of sustainability, Wombourne should be included within the highest settlement tier for the District. Whilst the findings of the 2018 audit must be applied flexibly when being used to inform the settlement hierarchy, the Council must also consider its wider environmental and technical evidence base to ascertain the key settlements that can facilitate sustainable growth.

Q19. Which of the following Spatial Distribution Policy Options do you think should be pursued? Are there any other options to consider, including any strategy which aims to provide a mixture of the policy options set out above?

- 3.13 A combination of Options A and C represents the most appropriate strategy for securing the spatial distribution of growth in the District over the plan period. By focusing growth around those settlements with the greatest level of services and facilities, coupled with sufficient public transport access, the Local Plan Review would be suitably aligned with the requirements of national policy where, as in this case, a large number of new homes will need to be delivered⁸. This will be necessary in order to meet both the District's objectively assessed requirement, as well as that which cannot be met within those areas of the Greater Birmingham HMA with which the District has a close relationship.
- 3.14 This combined option would be more effectively aligned with, and enable the ability to test, the recommendations set out in the HMA Strategic Growth Study. This would include the ability to deliver a strategic extension to the north of Wolverhampton. The approach would allow spatial growth to be delivered through a combination of urban extensions to Tier 1 settlements and sustainable sites on the edge of Wolverhampton, and proportionate dispersal of smaller-scale development across sustainable Tier 2

⁷ Rural Services and Facilities Audit 2018, Appendix 4 'Services and Facilities Audit by Settlement

⁸ NPPF 2018, paragraph 72

settlements. The Council's acknowledgement that focusing development into a smaller number of larger villages would enable the delivery of new infrastructure and services is supported; the concentration of new population growth in areas where there is scope to enhance facilities and services will help to ensure that centres remain vital and viable in the longer-term.

- 3.15 The ability to deliver development through smaller strategic and non-strategic site allocations around Tier 1 and 2 settlements would also help to boost supply, as such sites would require less upfront infrastructure works to bring forth development. This would provide the ability for a range of sites to be delivered, including those which would be capable of delivering supply in the first 5 years of the plan period such as land at Bratch Common Road in Wombourne.
- 3.16 The ability of a combined Option A and C to deliver a range of housing sites within the District negates the need to consider Option B, which would see development spread across all settlements. This option would not realise a sustainable spatial pattern of growth in the District, with lower tier settlements being unable to accommodate the facilities and services required to reduce dependency on travel to larger settlements. Many of the smaller villages are not afforded good accessibility by public transport links and therefore would not provide residents with sufficient access to services and employment opportunities, as required by the NPPF.
- 3.17 An approach solely focused on Option D for spatial distribution of growth is not considered sustainable; with the exception of the area north of Wolverhampton, which the HMA Strategic Growth Study identified as a potential urban extension, the wider recommendations of the study would not be achieved, with development principally focused in areas of high performance Green Belt. The latter is an important consideration; one of the five purposes of the Green Belt set out under paragraph 134 of the NPPF is to check the unrestricted sprawl of large built-up areas.
- 3.18 Pursuance of Option E – to achieve growth through the creation of new, freestanding settlements – would prevent the ability to achieve a much-needed boost in supply within the early part of the plan period. The Council will need to have particular regard to its obligations under the NPPF around maintaining a minimum five years' worth of housing against their plan-led requirement⁹.
- 3.19 The delivery of large new settlements will require significant levels of upfront investment in facilitating infrastructure before the construction and completion of dwellings can be realised. The issue is likely to prove particularly acute, given the identified shortfall in delivery against the housing requirement calculated using the current standard methodology.
- 3.20 The Council's final option for growth – Option F – places an over-reliance on meeting the District's housing requirement through the intensification of development on available sites within existing settlement boundaries. Whilst the ability to achieve optimum densities on individual sites will need to be subject to assessment through the Local Plan Review evidence base – which may conclude that some sites cannot achieve the minimum preferred density of 35 dwellings per hectare – the housing requirement identified for the plan period using the standard method, and taking into account unmet cross-boundary need, is significant and will not be met without the release of larger-scale sites on the edge of the most sustainable,

⁹ NPPF 2018, paragraphs 73, 74 and 75

higher-tier settlements in the District. This reflects the findings of the HMA Strategic Growth Study following assessment of increased densities on available sites within the West Midlands' built-up areas.

- 3.21 In consideration of the growth options identified within the Issues and Options consultation document, it is submitted that a combined Option A and C would be most closely aligned with, and achieve the objectives of national planning policy for achieving sustainable development, whilst helping to check the unrestricted sprawl of Wolverhampton and Dudley, and optimising housing delivery within the early part of the plan period.

4. Methodology – preferred spatial distribution and sites for development

4.1 St Philips' responses to questions (22), (23), (24), (25) and (26) identified within Section 6 of the consultation document, are provided herewith.

Q22. Has the Council identified the key factors which should inform which of the Spatial Distribution Policy Options(s) is taken forward in the Local Plan review? If not, what other factors should inform the spatial distribution of development?

4.2 The Council's recognition of the need for the preferred spatial distribution policy to be informed by a comprehensive evidence base is supported. Indeed a key requirement of the NPPF in testing the soundness of Local Plans is the need for strategic (and non-strategic) policies to be based on proportionate evidence, such that they can be justified¹⁰.

4.3 In the context of addressing unmet need arising from relevant parts of the Greater Birmingham HMA, it is imperative that the Council works proactively with the neighbouring Black Country authorities to ensure that there is a strategic Green Belt Review in place.

4.4 To this end, the Council should not be solely reliant on the Partial Green Belt Review that was prepared as part of its plan-making evidence base in 2016, as it considers only those Green Belt parcels around the District's villages. A fine-grained approach to Green Belt assessment should also be undertaken; parcels must be of an appropriate size to ensure that conclusions as to their overall performance can be applied in their entirety.

4.5 The Council is reminded of its obligations under the Habitat Regulations Directive, namely that policies advanced through the plan-making process should be the subject of Habitat Regulations Assessment (HRA). In light of recent case law¹¹, local authorities must ensure that all policies which could have impacts on European designated sites are subject to an appropriate assessment.

Q23. Do you agree that the factors above represent the key considerations for selecting the preferred sites?

4.6 As set out in response to question 22, the need for a comprehensive evidence base which is up-to-date for plan-making purposes will be important in order for site allocation policies to be found sound. The Council's acknowledgement of the key evidence-based documents at paragraph 6.4 of the Issues and Options consultation document is supported.

4.7 In conducting the Sustainability Assessment at each stage of the Local Plan Review, the methodology for assessing the options identified, including specific sites for allocation, must be consistently applied and supported by a clear audit trail. In particular, suitable sites for housing must be scored consistently against sustainability objectives; this will need to be informed by the wider plan-making evidence to ensure consistency in the findings and conclusions reached. For example, the scoping of sites against sustainability

¹⁰ NPPF 2018, paragraph 35(b)

¹¹ People Over Wind and Peter Sweetman v Coillte Teoranta, Case C 323/17, 12 April 2018

objectives should be aligned with the findings of the SHLAA. It will also be necessary to ensure that all reasonable alternatives are robustly assessed to ensure compliance with the 2004 Regulations¹².

Q24. In addition to the factors set out above, are there any other material planning considerations which should be used for selecting sites?

- 4.8 The introduction of the Housing Delivery Test within the revised NPPF places an increased responsibility on local planning authorities to ensure that sites allocated for residential development are deliverable. This will include a sufficient range of sites which are capable of achieving housing delivery in the early part (e.g. first five years) of the plan period.
- 4.9 In considering sites for allocation through the Local Plan Review, the Council should have regard to robust delivery trajectory information. There will be a need for strategic sites in particular to be supported by realistic delivery trajectories which demonstrate that their identified capacities can be achieved wholly within the plan period. This needs to take account of their ability to deliver housing through one or more sales outlets, which will be informed by available site frontage, access and location relative to other development sites.
- 4.10 A range of sites should be identified around the sustainable higher-tier settlements to accommodate growth in accordance with the spatial distribution strategy set out under Option A. This will ensure a balanced approach in addressing housing market dynamics, with sufficient choice offered through a range of different locations and types of development.

Q25. Are any of the factors more important than others for identifying sites for development, and should these have greater weighing in the site selection process?

- 4.11 Conformity with the preferred spatial strategy should be afforded significant weight in determining the location of the strategic and non-strategic sites for residential development. Ensuring homes are delivered in the most sustainable locations will be key to achieving the objectives set out under paragraph 8 of the NPPF. In the absence of significant environmental constraints, for example designated landscapes and sites of biodiversity value, the Council should, through the sustainability appraisal process, adopt a pro-active approach in considering the ability of development to address and mitigate potential environmental impacts.

Q26. Should sites only be taken forward for consideration where they are large enough to accommodate 10 or more dwellings – above the Government’s threshold at which we can ask for on-site Affordable Housing? If yes, is there any conflict with this approach and the national requirement for 10% of sites in the Plan to be on sites of 1 ha or less?

- 4.12 Whilst paragraph 68 of the NPPF does not compel local planning authorities to meet the 10% requirement where there is sufficient evidence to demonstrate that it cannot be achieved in a particular area, the Council must ensure that any sites of 1 hectare or less are capable of being delivered. Viability constraints can often prove more acute for small sites, as profitability margins are more susceptible to impact from abnormal development costs and planning risks. An over-reliance on such sites in meeting housing requirements for the plan period should be avoided. Larger sites in sustainable locations will increase the

¹² Environmental Assessment of Plans and Programmes Regulations 2004, Section 12

propensity for the much-needed delivery of affordable housing in the District and the ability to meet S106 planning obligations where these are required in order to offset the impacts of development.

5. Homes and Communities

5.1 St Philips' responses to questions (28), (29), (30), (35), (36), (41) and (45) identified within Section 7 of the consultation document, are provided herewith.

Q28. Which of the above options do you think should be pursued? Are there any other options to consider?

5.2 In the interests of ensuring that the viability of development is not undermined, the Council should not adopt an overly prescriptive approach to setting housing mix requirements. The approach set out under Option A is generally supported, as it would enable housing mix to be guided by SHMA requirements, whilst ultimately providing the ability to negotiate requirements on a site by site basis.

5.3 This will ensure a more flexible approach which is responsive to the changing needs of the population over the plan period. It will also provide the ability to tailor the mix of dwelling sizes and types to take account of development size and location, avoiding the constraints which could arise from the imposition of a single, uniform approach. It is considered that Option A would meet the requirements set out in paragraph 60 of the NPPF.

Q29. Which of the above options do you think should be pursued? Are there any other options to consider?

5.4 A flexible approach to meeting the need for specialist housing should be pursued; the approach set out under Option A would generally achieve this as it would enable to the requirements for such provision to be negotiated between developers and the Council on a site-by-site basis.

5.5 As per St Philips' response to question 28, such an approach would ensure that there is sufficient flexibility in the planning process and that viability on some sites would not be compromised where the size, location or other site-specific constraints could limit the ability to meet a policy-prescribed percentage of specialist housing. Paragraph 60 of the NPPF provides the Council with sufficient flexibility to adopt the approach proposed by Option A.

Q30. Which of the above options do you think should be pursued? Are there any other options to consider?

5.6 It is important that the Council's preferred policy for securing affordable housing provision is informed by a robust and up-to-date viability study. This should have regard to the findings of the SHMA and may set different affordable housing requirements for small sites in different localities within the District. For larger, strategic sites of 150+ dwellings, the Council's viability evidence base should be used to inform specific affordable housing requirements.

5.7 This will be necessary where, as typically expected, larger-scale development is required to deliver significant infrastructure, in the form of transport improvements, services and the provision of facilities such as new schools. This will be especially important where the Council decides to prepare a Community Infrastructure Levy (CIL) schedule.

5.8 The Council must ensure that any policy approach does not inadvertently constrain the deliverability of sustainable development by impacting on viability. Developers must retain the ability to negotiate

affordable housing provision in accordance with paragraph 62 of the NPPF. In view of this, a combination of Options A and C should be taken forward within the Local Plan Review.

Q35. Which of the above options do you think should be pursued? Are there any other options to consider?

- 5.9 The approach set out under Option A, which would see the Council's housing mix policy have regard to self-build and custom housebuilding provision, presents a suitable approach which ensures flexibility by enabling specific on-site requirements to be negotiated. It would endorse and maintain the approach which has been tested at Examination and implemented through the Site Allocations Document.

Q36. If a threshold was set as per Option B, what would be an appropriate threshold where plots should be provided?

- 5.10 Option B represents an overly prescriptive approach that would preclude the ability for such provision to be negotiated. This could have ramifications for developer viability and jeopardise the deliverability of development which would otherwise help to meet local housing need over the plan period. Consequently, Option B should not be pursued through the Local Plan Review.

Q41. Which of the above options do you think should be pursued? Are there any other options/design measures to consider?

- 5.11 As commented upon in respect of the above questions, the Council should be mindful of the need to promote flexibility when site-specific details are determined through the planning process. The South Staffordshire Design Guide provides comprehensive guidance upon which developers are able to tailor design to suit local setting and characteristics. Option A would continue to ensure that developers are able to tailor design and individual scheme components through discussion with the Council during the planning process.

- 5.12 Pursuance of Option A is recommended in order to achieve sufficient flexibility and enable development to be responsive to changing infrastructure requirements. This can include, for instance, the provision of new schools and other education facilities, whose requirements will change over the plan period based on population change and capacity monitoring. With this in mind, it would not be appropriate to require adherence to pre-determined masterplan requirements which may be imposed through policies in the Local Plan.

Q45. Which of the above options do you think should be pursued? Are there any other options/design measures to consider?

- 5.13 There is no requirement in national planning policy for local authorities to set space standards which exceed those set out in Part L of the Building Control Regulations. It is important that developers are not burdened with increased space standards which could prove onerous and impinge the viability of some schemes. The approach proposed by Option A, which would avoid setting a separate set of internal space standards for developments across the District, is considered a suitable and robust approach to be taken forward through the Local Plan Review.

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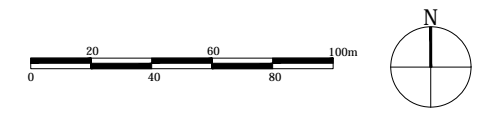
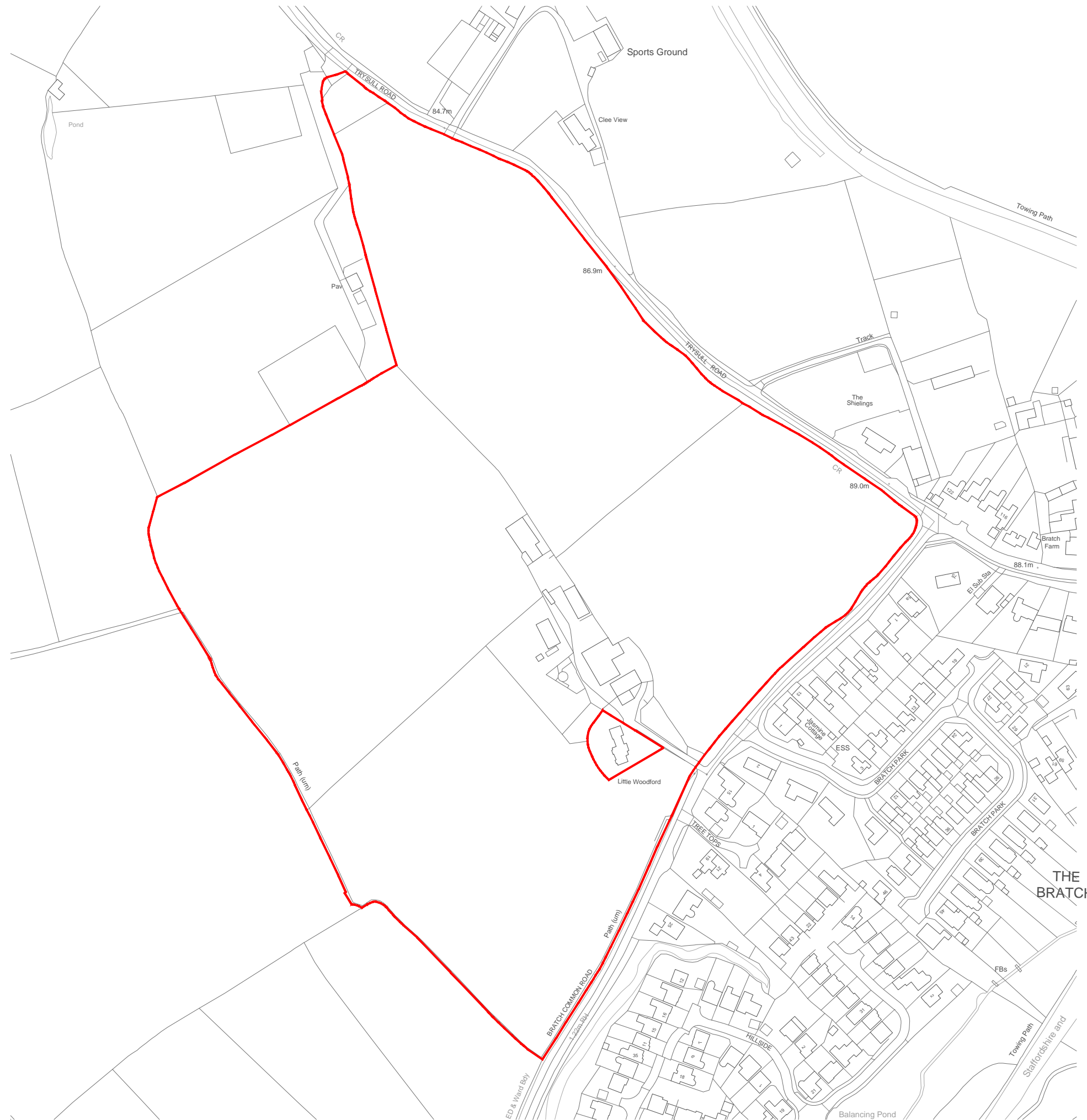
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The scaling of this drawing cannot be assured

Revision	Date	Drn	Ckd
A Little Woodford removed from site boundary	03.08.18	EMB	CDB

LEGEND

 Site Boundary
12.71 Ha



Project
**Bratch Common Road
Wombourne**

Drawing Title
Site Boundary Plan

Date	Scale	Drawn by	Check by
20.07.18	1:2500 @ A3	KU	EB
Project No	Drawing No	Revision	
29042	9000	A	



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South Staffordshire Council Local Plan Review

Spatial Housing Strategy & Infrastructure Delivery October 2019

Representations on behalf of St Philips – Land at Bratch Common
Road, Wombourne

December 2019

Our Ref: A112233



Introduction

These representations are submitted by WYG on behalf of St Philips Homes in respect of their land interests at Bratch Common Road, Wombourne, identified on the Plan at **Appendix 1**.

St Philips has submitted representations to the Issues and Options stage of the South Staffordshire Local Plan Review (**Appendix 2**) and a copy of a Vision Document showing how the site at Bratch Common Road could be developed is enclosed for information (**Appendix 3**).

The representations are structured to respond to the questions set out on the online consultation response form. They also make specific reference to the tests of soundness for plan-making set out at para 35 of the National Planning Policy Framework (NPPF). Specifically, these representations seek to test the proposed Spatial Housing Options in terms of whether they are:

*"a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*

*b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*

*c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*

*d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework."*

Footnote 19 is within para 25, and states that a clear and justified methodology for the provision of housing should be used in accordance with para 60 of the NPPF (which sets out a standard methodology for identifying objectively assessed need).

St Philips have been promoting their land interests at Bratch Common Road since 2018 and have made appropriate representations to earlier stages of the South Staffordshire Local Plan review. The Site’s location within the Green Belt has been taken into account and the requirement to demonstrate exceptional circumstances in relation to the release of land from the Green Belt has also been considered.

The land at Bratch Common Road has previously been considered to have potential to accommodate residential development in the Council’s Strategic Housing Land Availability Assessment, and the Council’s



Green Belt review (LUC, 2019) has already considered the land in terms of its contribution to the purposes of including land in the Green Belt. A master planned approach to the development of the Site would allow the land to be released for housing to meet identified needs whilst protecting the wider Green Belt and not eroding the reasons for the wider land being within the Green Belt.

As set out in the Vision Document (**Appendix 3**), St Philips have undertaken detailed background research work to assess the Site with reference to accessibility, landscape, on-site features and landform, heritage and archaeology, ecology, drainage, noise, air quality and utilities. The Design Principles set out in the Vision Document show how the Site could accommodate residential development that would integrate with the existing settlement and provide approximately 250 new homes whilst retaining the edge of village feel and protecting the Green Belt beyond the Site.

St Philips are also keen to ensure that any development integrates into its context and not only meets housing need but also supports local infrastructure and creates a development that integrates into the local community. They have already sought to engage with both Trysull and Seisdon and Wombourne Parish Councils on this matter and will continue to do so as part of the Local Plan Review process.



Response to Question:

1) Do you agree that the evidence base used to inform Spatial Housing Options is robust and proportionate?

Evidence Base

There is no in principle objection to the evidence that the Council has utilised to date. However, when the later stages of the Local Plan Review are engaged the Plan and evidence base utilised must be tested against the relevant paragraphs of the NPPF, to establish if the overall Plan is sound:

- NPPF Para 31: *"Preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals."*
- NPPF Para 32: *"Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered)."*
- NPPF Para 33: *"Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years and should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future."*

The Council has already sought to set the proposed housing targets prior to the current Local Plan Review consultation so it is not the purpose of these representations to make further comment on this matter, or to comment on the proposed 4,000 dwellings to meet unmet need within the Housing Market Area (HMA); others will no doubt be providing detailed comments and this matter will be discussed further at the Examination in Public stage of the Local Plan Review.

The use of the standard methodology to determine housing need for South Staffordshire across the Plan



period 2018-2037 is in accordance with para 60 of the NPPF. However, this has failed to recognise the Greater Birmingham Housing Market Area (GBHMA) September 2018 Position Statement, which outlines an Objectively Assessed Need for South Staffordshire of 5,933 dwellings between 2014 – 2036.

It is also understood that an updated HMA paper on housing is expected from the GBHMA and the LPA should take this into account as the Local Plan Review progresses. It is reasonable for this to be taken into account in accordance with NPPF para 60 which indicates that the approach taken to housing land supply should reflect *"current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for."* In order for the Local Plan Review to be consistent with national policy, and therefore sound, it must take account of all information available.

Sustainability Appraisal (SA)

Section 39 of the Town and Country Planning Act 1990 (as amended) requires Local Plans/SPDs to be prepared with a view to contributing to the achievement of sustainable development. A Sustainability Appraisal is one way of helping fulfil this duty through a structured appraisal of the economic, social and environmental sustainability of the plan. In accordance with para 32 of the NPPF, the production of a SA is one of the *"tests of soundness"* on a Local Plan/SPD.

Further guidance on the preparation of the SA in relation to the stages of Local Plan production together with the information to be covered within the SA Report is set out in the Planning Policy Guidance (PPG) dated March 2014. The PPG states at paragraph 11-009 that the Sustainability Appraisal should *"focus on the environmental, economic and social impacts that are likely to be significant."*

The guidance goes on to state at paragraph 11-018 *"The sustainability appraisal must consider all reasonable alternatives and assess them in the same level of detail as the option the plan-maker proposes to take forward in the Local Plan (the preferred approach)"*.

The PPG states at para 11-021 and 11-023 that if draft Local Plans are modified either following consultation or through independent examination, the local planning authority should decide if the Sustainability Appraisal also needs to be updated. Para 11-021 states that *"further assessment may be required if the changes have not previously been assessed and are likely to give rise to significant effects."*

The strategy adopted by the Council is one which does not appear to have identified positive and negative significant effects that are any better or worse than some of the other Spatial Options considered. It is not convincing that the proposed Spatial Option is the most appropriate, particularly when, by the Council's own admission in the published documents, the strategy is (whilst Officer endorsed) 'very much Member-led'



rather than being borne from a clearly identified 'most appropriate' option.

In addition, further work is needed to consider Green Belt land release and meet the NPPF tests of exceptional circumstances for the release of land from the Green Belt. This must include a consideration of the harm that would be caused to the Green Belt by the release of land for development, with reference to the wider land remaining in the Green Belt and its purposes as set out in the NPPF. Development should be directed to areas where Green Belt land release can both meet the tests of exceptional circumstances and result in the lowest levels of harm to the Green Belt. At the present time, the likely significant effects of the chosen spatial option cannot be fully understood and the Local Plan Review cannot be found sound as the SA has currently not been fully justified.

Response to Question:

5) Do you agree that the 7 Spatial Housing Options set out above are appropriate options to consider? Are there any alternative options we have not considered?
and

6) Do you agree that Spatial Housing Option G is a robust approach to meet needs in the district and to make a contribution towards unmet needs in the GBHMA?

Reference should be had to the response submitted to Question 1 of this consultation, which highlights concerns that the proposed chosen spatial option may not have been determined to be the most appropriate with reference to the significant effects identified in the Sustainability Appraisal, without any understanding of the effects that specific site allocations may have on the implementation of that strategy.

Notwithstanding, there is no in principle objection to the spatial options considered, nor to Spatial Option G as the preferred option, which would seek to deliver the required housing targets for South Staffordshire. However, there are some concerns over the proposed detailed spatial matters for 'Spatial Option G'. These concerns relate to the proposed development of, as yet unidentified sites which are adjacent to a conurbation that is not within the administrative area of South Staffordshire Council and whether the infrastructure of those areas can accommodate additional development.

The Black Country conurbation is well defined on its western edge, with Green Belt extending north from the edge of Norton (Stourbridge) to include Stourton, Kingswinford and Wall Heath, Sedgeley and toward Wolverhampton. The Green Belt Study (LUC, 2019) identifies that areas immediately adjacent to the edge of the Black Country built-up urban area are already under pressure (Fig 3.1) with high level harm to the Green Belt identified for land in that area (Fig 7.3b).

With reference to the purposes of including land in the Green Belt at NPPF para 134, the allocation of land that would cause high levels of harm to the Green Belt would not meet the relevant tests:

- a) to check the unrestricted sprawl of large built-up areas – the Black Country is already a larger conurbation and this would increase the sprawl of the built-up urban area.
- b) to prevent neighbouring towns merging into one another; - Stourbridge, Stourton, Kingswinford and Wall Heath would be significantly closer to Kinver and Wombourne if the Black Country conurbation was extended.



c) to assist in safeguarding the countryside from encroachment; - this is countryside which is accessible to Black Country residents and indeed well-utilised. Development along the western edge of the Black country would encroach into this countryside.

The justification for this strategy and release of land in locations immediately adjacent to the Black Country conurbation is therefore not considered to be fully justified at the time of this consultation.

Further, infrastructure improvements delivered from housing on the western side of the Black Country would not benefit South Staffordshire District Council. There is no evidence that the current infrastructure within Dudley MBC or Wolverhampton MBC administrative areas can accommodate additional housing development. No evidence has been provided to confirm that, inter alia, schools, doctors, NHS services, and local highways can accommodate additional development. Any planning obligation, Community Infrastructure Levy (CIL) and Section 106 monies would therefore not be beneficial to South Staffordshire but would need to be provided to Dudley / Wolverhampton, and the associated social and economic benefits from the housing development to local economies would not be seen within South Staffordshire.

However, sites not immediately adjacent to the edge of the Black Country but around existing settlements, within South Staffordshire, such as Wombourne, would cause lower levels of harm whilst still meeting the aspirations of the proposed Spatial Strategy Option G and also protecting the overall purposes of including land within the Green Belt.

Land within Wombourne and that at Bratch Common Road has been identified as causing lower – moderate harm to the Green Belt. Development would enhance the sustainability of the village and include the provision of additional infrastructure delivery that could, with reference to the Council's Rural Services and Facilities Audit 2019, assist in improving access to places of employment or NHS services via public transport, or deliver additional community infrastructure for the village.

In addition, with reference to the NPPF para 134 the purposes of including land in the Green Belt are:

- a) to check the unrestricted sprawl of large built-up areas: development of St Philips' land interests at Bratch Common Road would not cause any lessening of the gap between Wombourne and the western edge of the Black Country.
- b) to prevent neighbouring towns merging into one another: development of the Site would not result in Wombourne being any nearer to Wolverhampton, Kinver or Bridgnorth than its current extents.
- c) to assist in safeguarding the countryside from encroachment: development of the land at Bratch Common Road could provide a strong and defensible boundary to the edge of the



settlement to define it from the Green Belt beyond in such a way that its boundaries would remain in place beyond the end of the Plan period.

With a lower harm impact than other locations around the western edge of the Black Country conurbation and the ability to accord with the purposes of including land within the Green Belt, Wombourne should be a preferable location for development to fulfil the aspirations of the chosen Spatial Option for the delivery of housing in South Staffordshire. Development here would also still fulfil the Greater Birmingham Housing Market Area (GBHMA) Study (Feb 2018) which indicates at para 8.120 that additional development located between Stourbridge and Wolverhampton could result in a limited likely overall effect on the Green Belt functions associated with the rounding off of development boundaries.

Development of the land at Bratch Common Road could also provide additional benefits to the local economy in South Staffordshire, including the provision of affordable housing, spend in the local economy and local infrastructure improvements.



Response to Question:

8) What other information (if any) should we consider before concluding that Green Belt release is justified?

NPPF Para 135 states that exceptional circumstances must be demonstrated to alter Green Belt boundaries. Housing need alone is not necessarily sufficient to justify the test of exceptional circumstances for the release of land from the Green Belt.

At present, the draft Local Plan Review establishes that Green Belt land will be required for development in order to meet identified housing needs. A significant proportion of the South Staffordshire Council administrative area is designated Green Belt and it is accepted that land constraints mean that a review of Green Belt boundaries and identification of land to meet housing needs, whilst protecting the fundamental aims of the Green Belt, is required.

NPPF para 134 sets out the five purposes of including land in the Green Belt. As set out in response to Questions 5 and 6 of this consultation, any Green Belt land release would need to ensure that land remaining within the Green Belt would not harm the purposes fulfilled by the remainder of the Green Belt land. With reference to the specific comments made in these representations, whilst there is no in principle objection to the preferred Spatial Option, the release of land from the Green Belt to meet the spatial strategy must be fully justified. Site allocations must meet the tests of exceptional circumstances and the release of land must not harm the purposes of the wider Green Belt itself.



Response to Question:

9) Have we identified the key criteria for the identification of sites (as set out in Appendix 6)? Are there any other factors we should consider?

There is no in principle objection to the site selection criteria identified by the Council. However, as set out within these representations, in order to ensure that the Sustainability Appraisal meets relevant criteria and identifies the most appropriate strategy for the District, all site suggestions for inclusion as allocations should be assessed against the criteria set out in the Sustainability Appraisal, which will need to be reviewed to inform the Site Selection stage of the Local Plan Review.



Response to Question:

10) Do you agree that, when selecting sites to deliver the preferred spatial housing strategy, the Council should seek to avoid allocations housing sites that would result in very high Green Belt harm wherever possible?

In short, these representations agree that the release of Green Belt sites of high harm should be avoided in the Local Plan Review. In accordance with paras 136-138 of the NPPF, and to reiterate the content of these representations, the Council's proposed chosen strategy, if taken forward with modifications to the proposed location of development 'to the west of the Black Country', can be delivered on sites of lower – moderate Green Belt Harm, where the tests of exceptional circumstances can also be demonstrated that are beyond housing need alone. My client's land at Bratch Common Road is such a location that would enable the strategy to be fulfilled and the Plan to be found sound.



Appendices



Appendix 1 – Site Location Plan



Appendix 2 – Copy of representations submitted to Issues and Options Consultation



Appendix 3 - Vision Document

APPENDIX 3

VISION DOCUMENT

BRATCH COMMON ROAD

WOMBOURNE

DECEMBER '18



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This artwork was printed on paper using fibre sourced from sustainable plantation wood from suppliers who practice sustainable management of forests in line with strict international standards. Pulp used in its manufacture is also Elemental Chlorine Free (ECF).

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VISION

The site at Bratch Common Road offers the unique potential to successfully integrate with the surrounding countryside and village of Wombourne. The design will sensitively respect the local characteristics of Wombourne to ensure creation of an attractive, high quality and locally distinctive place to live. The health and well-being of residents is central to the design, with active and sustainable lifestyles encouraged through the provision of walking and cycle routes, play facilities and other welcoming open spaces.





1. INTRODUCTION

1.1. Document Scope

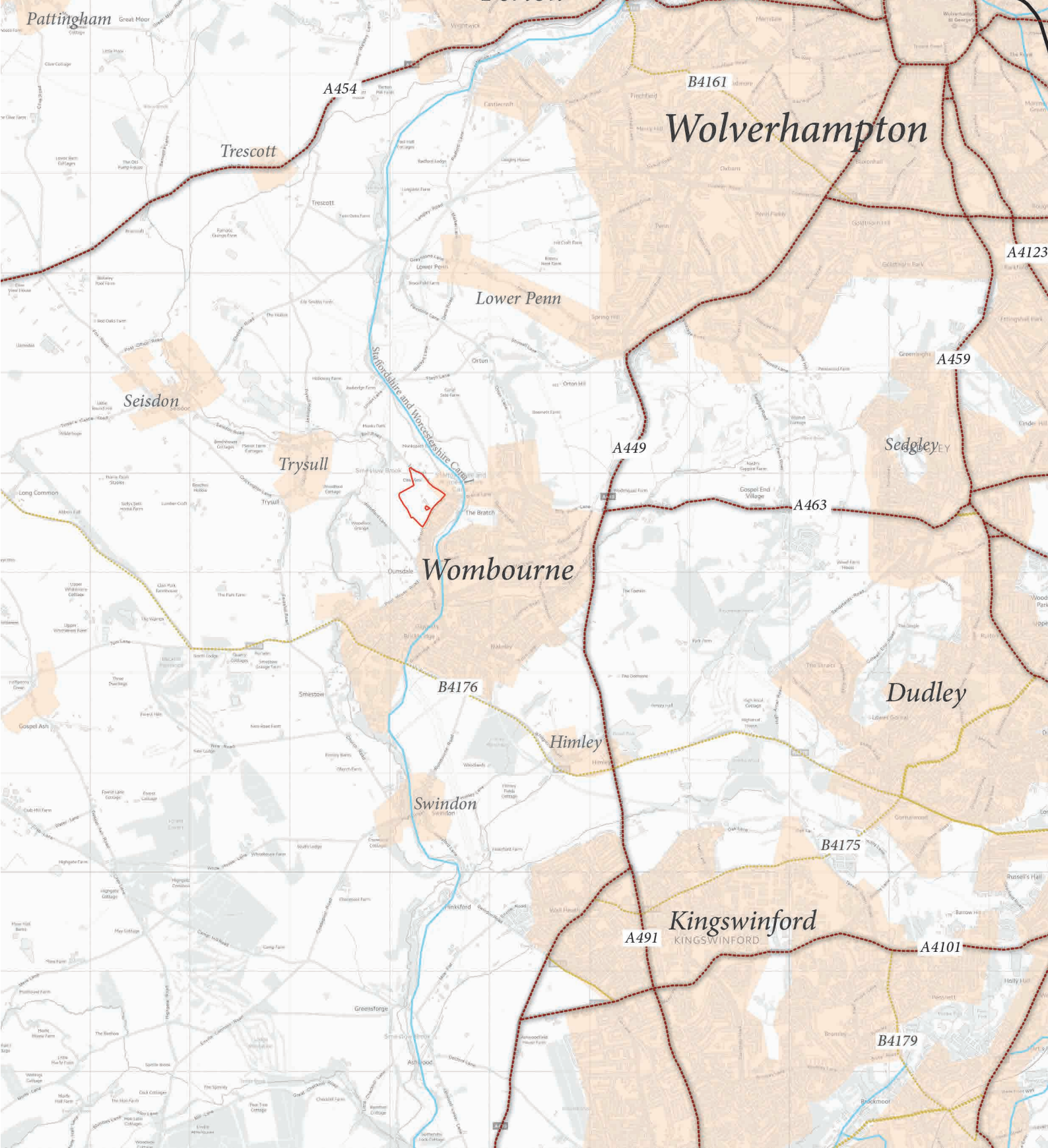
This Vision Document has been prepared on behalf of St Philips Ltd to support promotion of the site for residential development at Bratch Common Road, Wombourne through the South Staffordshire Local Plan review process.

The key aims and objectives of the document are:

- to review the site in the context of current planning policy;
- to present an initial understanding of the site within the local context;
- to provide a summary of current site assessments undertaken to date; and
- to present an emerging concept masterplan, accompanied by an explanation of the key design principles that have informed it.

1.2. Site Location

The site is situated on the north-western edge of the village of Wombourne. It lies around 7km south-west of Wolverhampton and 8km west of Dudley.



Pattingham

A454

B4161

Wolverhampton

Trescott

Lower Penn

A4123

A459

Seisdon

Trysull

A449

Sedgley



Wombourne

A463

B4176

Dudley

Himley

Swindon

B4175

Kingswinford

A491

A4101

B4179

1.3. Site Description

The site, shown opposite, is situated south of Trysull Road and bounded by open countryside to the west and south and Bratch Common Road forming an attractive, tree lined boundary to the east.

The site is comprised of two agricultural fields of varying scales, with field boundaries defined by hedgerows and tree lines and a number of old farm buildings which are due to be demolished. Ground levels vary throughout the site. The south and east of the site is generally flat, seeing a gradual decrease in height towards the northern edge, the north-western edges in particular. A public right of way runs along the southern and eastern edge connecting to the wider countryside.

The aerial photo shows how the site is well related to the existing settlement edge of Wombourne.



Site Photo - Bratch Common Road

Trysall Road

Bratch Lane

Staffordshire and
Worcestershire Canal

Bratch Common Lane

Wombourne



1.4. Planning Policy

The site is situated within the administrative area of South Staffordshire District Council (“the Council”) and currently lies within the designated Green Belt.

The statutory development plan for the District is comprised of the Core Strategy (adopted in 2012) and the Site Allocations Document (SAD) (adopted in 2018). The Council has recently embarked on its Local Plan Review; consultation on the Issues and Options version is being undertaken during October and November 2018, with progression to Preferred Options anticipated in Spring 2019.

Local Plan Review

The Local Plan Review is proposed to cover the period to 2037, replacing the extant development plan upon its adoption. It will allocate sites in order to meet the District’s development requirements for the plan period; the housing requirement will be finalised upon the publication of the new Standard Method for calculating local housing need (expected from the Government by 24 January 2019), and will also need to take account of unmet cross-boundary need.

The proportion of unmet need arising from the Greater Birmingham Housing Market Area (HMA) to be accommodated within the District is yet to be determined through the duty to co-operate process. Whilst the level of need will be subject to recalculation using the Government’s revised standard methodology, the Greater Birmingham Housing Market Area Strategic Growth Study (published in 2018), identifies a shortfall 60,855 for period between 2011 and 2036.

The Government’s consultation into the revised NPPF saw the publication in September 2017 of Local Housing Need (LHN) figures for all local authority areas using the Standard Method. For South Staffordshire, this equated to a per annum requirement of 245 dwellings for the period between 2016 and 2026. However, following the publication of the 2016 Household Projections in September 2018, the Government has announced its intention to review the Standard Method amid concerns (confirmed by Housing Minister Kit Malthouse) that the local housing need calculations must take account of ‘pent-up demand’.

For the plan-making purposes, the Government has advised local planning authorities to calculate local housing need using the 2014 household projections as a demographic baseline. Accordingly, as part of its response to the Council’s Issues and Options consultation (which should be read in conjunction with this Vision Document), GVA, on behalf of St Philips, have recalculated the District’s objectively assessed need for the plan period. This suggests a requirement for 5,529 dwellings to meet District-specific need between 2018 and 2037.

Whilst the Issues and Options version of the Local Plan Review acknowledges the issue of cross-boundary need, its preferred strategy – ‘Option C’ – to accommodate 4,000 dwellings from the HMA shortfall, is not underpinned by an evidence-based approach. In response to this issue, GVA have analysed the District’s relationship with the Greater Birmingham HMA and devised an appropriate methodology upon which unmet need can be apportioned. This is informed by travel-to-work patterns and out-migration flows to the District, using ONS data.

Whilst set out in detail within St Philips' representations, the analysis concludes that 6,209 additional dwellings would be required within the District to provide a proportionate approach to accommodating unmet need arising from those areas of the HMA to which the District has a demonstrable and tangible relationship. This would equate to a total requirement of 11,738 dwellings for the plan period – above the level identified under the Council's preferred Option C, but significantly less than Options D and E, thus representing a realistic prospect of delivery at 618 dwellings per annum.

As confirmed through its response to the Local Plan Review Issues and Options consultation document St Philips is supportive of a strategy which combines Options 'A' and 'C' in respect of the spatial distribution of growth. This would focus residential development principally around the higher tier (Tier 1 and 2) settlements, and sustainable sites on the edge of Wolverhampton, in line with the recommendations of the HMA Strategic Growth Study.

This would align with paragraph 72 of the NPPF, which is supportive of accommodating development within significant extensions to existing towns and villages where a large number of homes are required over the plan period.

Evidence Base

The Council's updating of its Strategic Housing and Employment Land Availability Assessment (SHELAA) to inform the Local Plan Review will, by virtue of this Call for Sites evidence gathering exercise, provide a renewed opportunity to consider the suitability of land at Bratch Common Road, Wombourne.

The majority of the site forms land which has previously been identified as having potential for residential development, most recently through the 2018 SHELAA (Ref. 554). Table 6 of the SHELAA assigned an 'amber' rating to the site, on the basis that it was not currently available due to its Green Belt designation. No other environmental or technical constraints were cited. This position is corroborated by the evidence subsequently set out in this Vision Document.

The joint commissioning of the Black Country and South Staffordshire Green Belt Review is welcomed and is necessary in the context of addressing unmet cross-boundary housing needs. Whilst the publication of the review is not expected until Spring 2019, it is important that a sufficiently fine-grained approach to the assessment of Green Belt parcels is adopted. Parcels must be of an appropriate size to ensure that conclusions as to their overall performance can be applied in their entirety.

1.5. Assessment Against The Five Purposes of The Green Belt

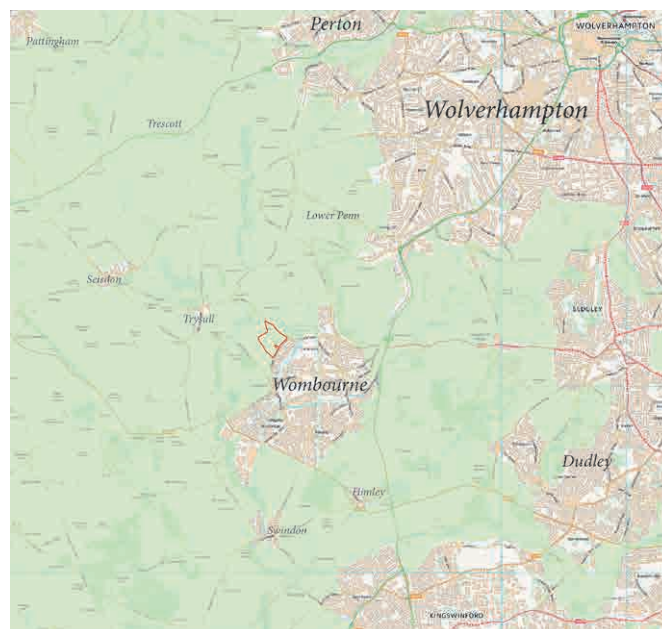
To date, the Council’s most recent evidence to inform the areas of Green Belt designation within the Borough is the South Staffordshire Partial Green Belt Review 2016. This considers the performance of Green Belt parcels around the defined settlements in the District, but stops short of assessing the contribution made by that which adjoins the Black Country urban area.

In the context of Wombourne, the partial review assesses 7 parcels which adjoin the settlement boundary; number 6(D) includes the site at Bratch Common Road and forms a large, elongated parcel adjoining the western boundary of the village. In accordance with the assessment methodology, the parcel’s performance was scored against the five purposes of the Green Belt, set out in paragraph 134 of the NPPF.

In terms of performance against the indicator set out under paragraph 134(a) the NPPF – to check the unrestricted sprawl of large built-up areas – parcel 6 was assigned a low score due to its location, which does not prevent the spread of development from Wolverhampton. Whilst the ability of the parcel to prevent ribbon development along Trysull Road was reflected in a higher score specifically for this purpose, it is demonstrated within this Vision Document that sufficient landscape buffers can be maintained either side of this road, including along the Worcestershire and Staffordshire canal corridor.

In the considering the indicator set out under paragraph 134(b) of the NPPF – to prevent neighbouring towns merging into one another – the focus of the review centres upon the relationship of the parcel to the small village of Trysull (situated to the west).

Whilst the assessment notes that the wooded floodplain of Smestow Brook serves to prevent the merging of Wombourne and Trysull, landscape enhancements which could be delivered as part of an allocation for residential development on the site at Bratch Common Road, would bolster the physical barrier between the settlements, thus retaining the function of the Green Belt for this purpose.



Local Green Belt Extent

In the context of NPPF paragraph 134(c), it is noted that parcel 6 has been assigned a high score for the purpose of assisting in the safeguarding of the countryside from encroachment. Whilst the parcel generally promotes openness and offers views towards the wider open countryside, the urbanising influence of Wombourne should be acknowledged and reflected in the scoring of the forthcoming joint Green Belt review.

The partial release of land within the northern part of parcel 6, which would facilitate residential development at Bratch Common Road, would see the majority of the parcel remain undeveloped and continuing to serve its purpose in safeguarding the countryside. Moreover, the creation of a wooded landscape buffer around the western boundary of the development would, in the longer-term, reduce the visible urbanising influence of Wombourne when taking in views from Trysull.

The landscape enhancements envisaged and detailed within this Vision Document would similarly reduce the impact of Green Belt release within parcel 6 on the setting and historic character of Trysull (a designated Conservation Area). This should be considered in the planning balance when determining how land within Parcel 6 would continue to fulfil this purpose in accordance with paragraph 134(d) of the NPPF.

The partial Green Belt review concedes that Parcel 6 does not make a significant contribution towards achieving the purpose set out under NPPF paragraph 134(e) – to assist in urban regeneration by encouraging the recycling of derelict and other urban land. This is due to the notable absence of previously developed land within the District's villages, which is capable of accommodating new housing.

As acknowledged within the Local Plan Review Issues and Options consultation, and corroborated through GVA's independent analysis, the District will need to consider Green Belt release in order to meet its own objectively assessed housing need, as well as a proportion of unmet cross-boundary need arising from the Greater Birmingham HMA.

By taking a sensitive approach to masterplanning, that incorporates significant landscape enhancement measures to offset the impacts of development and protect the wider Green Belt, there will be a demonstrable and compelling case to justify that exceptional circumstances exist for the release of land at Bratch Common Road to help meet the District's housing needs.

Notwithstanding the site's current Green Belt designation within the extant development plan, the Council's wider evidence base for plan-making purposes confirms that there are no significant environmental or technical constraints which would preclude an allocation for residential development. This is further borne out by the analysis which is set out in this Vision Document.

Notwithstanding the site's current Green Belt designation within the extant development plan, the Council's wider evidence base for plan-making purposes confirms that there are no significant environmental or technical constraints which would preclude an allocation for residential development. This is further borne out by the analysis which is set out subsequently in this Vision Document.

2. LOCAL CONTEXT

2.1. Access, Movement & Facilities

The site is located approximately 2.5km to the north-west of Wombourne village centre, and is bound by Bratch Common Road (to the east) and Trysull Road (to the north).

The A491 runs approximately 2.2km to the east of the site in a north south alignment. The A491 routes between Wolverhampton and Stourbridge, whereby the wider strategic road network can be accessed, ensuring that destinations including Wolverhampton, Telford, Kidderminster and Birmingham are within easy reach.

The site is well located to key local services and amenities in Wombourne. Key local amenities including Ounsdale High School, Westfield Community Primary School, Dale Medical Centre, a newsagent and several bus stops are located within 1.4km of the site. Additionally, within Wombourne, there are recreational areas including the Wombourne Cricket, Tennis and Bowling Club, and Wombourne Library and Community Centre, alongside other facilities such as dentists, pharmacies and petrol stations, all of which are considered to be within an acceptable walking distance from the site.



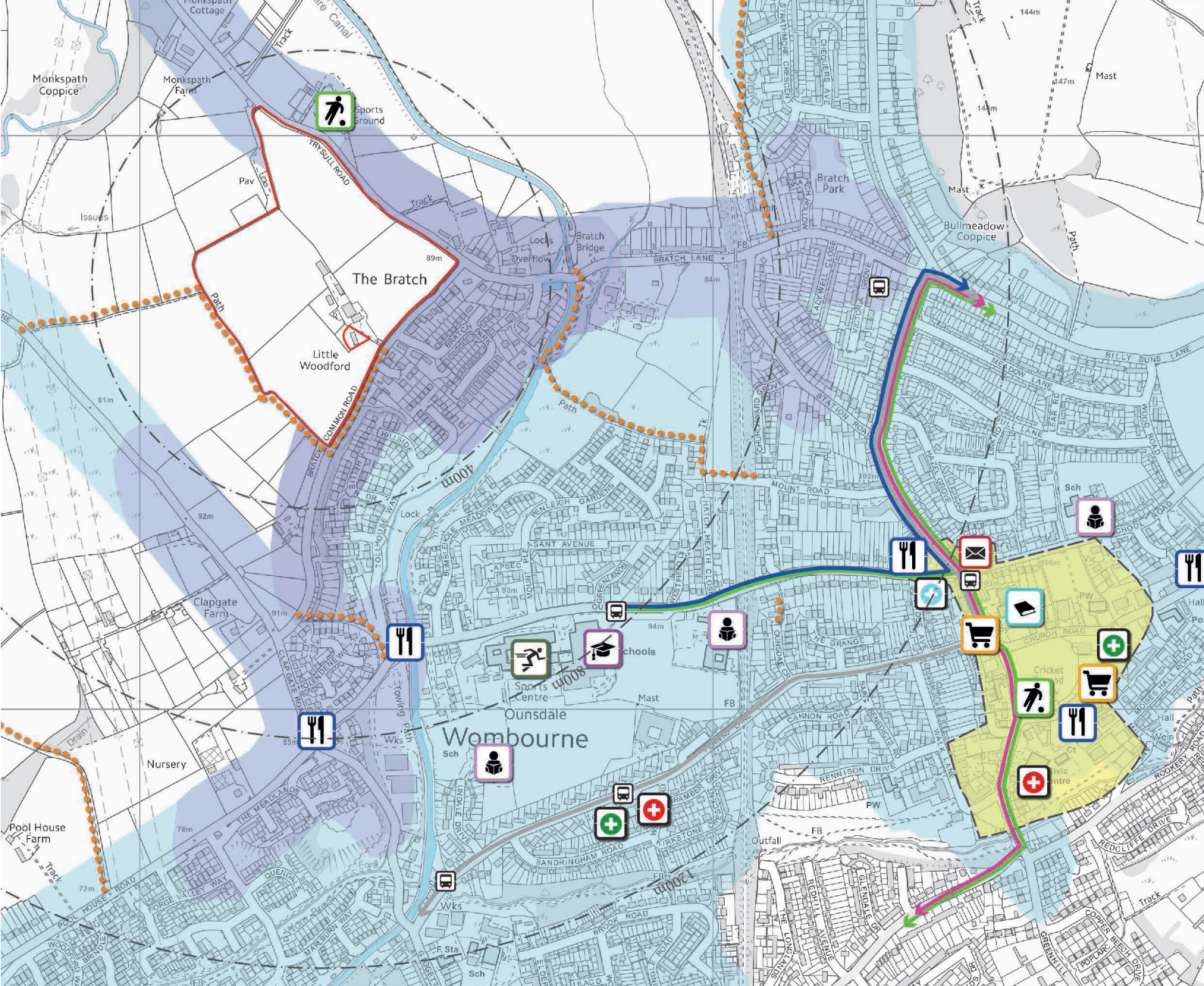
Local bus service connecting to village centre.





Local Co-operative



View south over village green / cricket pitch.



Local Movement & Facilities Plan

- | | | | | | | | |
|---|---------------------|---|-------------------|---|---------------|--|---|
|  | Site location |  | Primary School |  | Post Office |  | Bus Stop |
|  | Isochrone |  | Secondary School |  | Health Centre |  | Service 15 - Wolverhampton - Merry Hill via Kingswinford |
|  | Local Centre |  | Leisure Centre |  | Pharmacy |  | Service 16 - Wolverhampton - Stourbridge via Kingswinford |
|  | 0 - 6 Minute Walk |  | Sport Facilities |  | Dentist |  | Service 16s - Wolverhampton - Stourbridge |
|  | 6 - 12 Minute Walk |  | Convenience Store |  | Library |  | Service 25s - Ounsdale Secondary School - Blakenhall |
|  | 12 - 24 Minute Walk |  | Cafe/Restaurant | | | | |

2.2. Landscape Character

National Landscape Character: NCA: 66 Mid Severn Sandstone Plateau

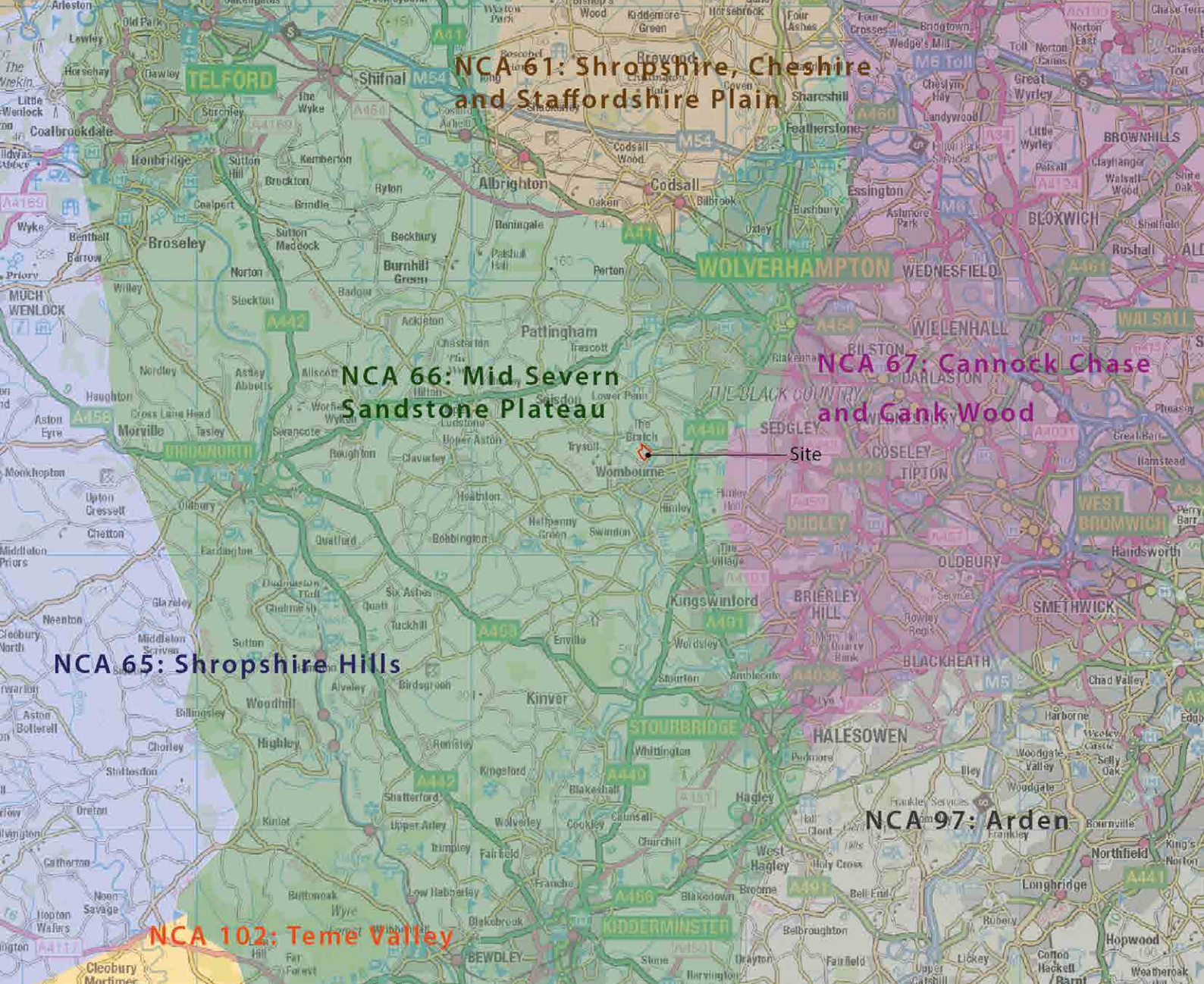
Landscape Character Assessment at a national level of study is recorded by Natural England (NE) within 159 National Character Areas (NCA). The Landscape and Visual Appraisal (LVA) contained within the Vision Document (VD) records a careful appraisal of the national level character study in relation to the site and the emerging development proposal.

The site and its immediate surroundings lie within the National Character Area profile: NCA 66 Mid Severn Sandstone Plateau. NCA 66 is a large area extending to more than 88,000ha. The site and its setting exhibit some of the key characteristics of NCA 66 that include:

- Extensive sandstone plateau in the core and east of the NCA underpins an undulating landscape with tree-lined ridges.
- The plateau is drained by the rivers Worfe and Stour and fast-flowing streams such as Smestow Brook in small wooded, steep-sided streamside dells, locally known as dingles.
- Mixed arable and pasture land with smaller, irregular shaped fields bounded by hedgerows with hedgerow oaks.

- Traditional buildings constructed of brick vary in colour. The local Kidderminster and Bromsgrove Sandstone features extensively. Its characteristic red colouration provides local distinctiveness to many towns and villages and estate boundary walls.
- Important man-made heritage features include the Staffordshire and Worcestershire Canal, the M54 and the railway line that links the River Severn with the Trent and Mersey Canal.
- The NCA is predominantly rural and the extensive sandstone plateau extends across the central and eastern area where it meets with the urban areas of Birmingham and the Black Country.





National Character Area Plan



Site Boundary

Natural England National Character Areas (NCA):



NCA 66: Mid Severn Sandstone Plateau



NCA 65: Shropshire Hills



NCA 102: Teme Valley



NCA 97: Arden



NCA 61: Shropshire, Cheshire and Staffordshire Plain



NCA 67: Cannock Chase and Cank Wood

2.3. Regional Landscape Character

Planning for Landscape Change: Supplementary Planning Guidance to the Staffordshire and Stoke on Trent Structure Plan 1996-2011

Staffordshire County Council's SPG: 'Planning for Landscape Change' is now over 20 years old. It provided guidance on the landscape and visual character of the county. Although the report is now out of date, the description and evaluation of the county presented within is still accurate and therefore has been in used to inform the landscape character within this VD.

The SPG describes the landscape character of Staffordshire in 22 different Landscape Character Types (LCTs). The site and its setting fall within LCT - 'Sandstone hill and heath'. The LCT is characterised by pasture and grazing farmland patterned by irregular but largely intact, small-scale fields. The landform is undulating and in places, is deeply cut by stream valleys. The views across this gentle landform range from short to medium length. Where long range views are not obstructed by trees or settlements, the distant horizon is made by the high ground of Orton Hill, over 1 km to the north-east.

Major communication routes run from south to north through the county including the M6, the A449 and the Staffordshire and Worcestershire Canal.

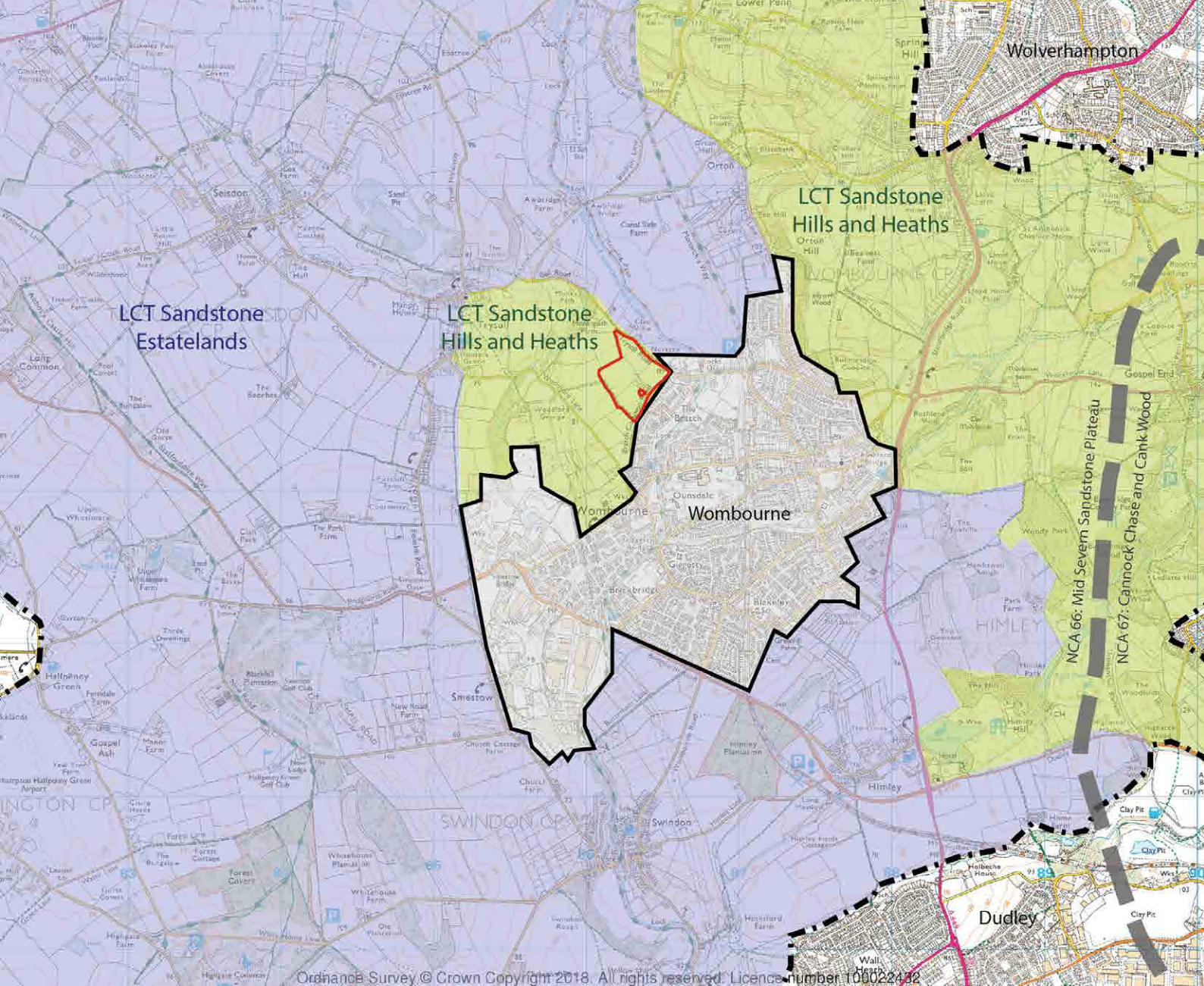
2.4. Local Landscape Character

The site adjoins the western boundary of the built-up area of Wombourne which lies within the administrative boundaries of South Staffordshire Council (SSC). The Supplementary Planning Documents SSC contain a Historic Environment Character Assessment (HECA) and a Landscape Sensitivity Study (LSS) for housing. The Council does not have a Landscape Character Assessment (LCA). In the absence of such LCA the local landscape character is informed by the HECA and LSS.

Historic Environment Character Assessment: South Staffordshire (2011)





The HECA by Staffordshire County Council for SSC recognizes 13 'Project Areas' within the district for the assessment. The HECA aims to establish the potential for the historic environment of these project areas to absorb new development and housing in particular. The site falls within the 'Swindon and Wombourne' (SW) Project Area. All project areas are subsequently divided into 'Historic Environment Character Zones' (HECZs). The site is located within the central part of SWHECZ 2 - West of Orton Hill and The Bratch.

SWEHCZ 2 has 5 Historic Character Types (HCTs) present within the area. The site is situated within HCT: 'Piecemeal Enclosure'. The open fields were often enclosed incrementally as 'Piecemeal Enclosure' during the post medieval period. 'Piecemeal Enclosure' is typified by reverse 'S' and sinuous field boundaries some of which appear to be discernible within the field pattern.



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Local Landscape Character

- | | | | |
|---|--|---|--|
|  | Site Boundary |  | Staffordshire County Council LCT: Sandstone Hills and Heaths |
|  | County Boundary |  | Staffordshire County Council LCT Sandstone Estatelands |
|  | Natural England: National Character Area | | |
|  | Settlement | | |

The 'Piecemeal Enclosure' at The Bratch had probably originated as one of the open fields belonging to Wombourne known as 'Pottelith' field in the 13th century. This field, known later as Putley Field, was apparently still open in the early 18th century, so this field system was probably created later in the 21st century.

The HECA further recommends that any proposed development should seek to complement the low settlement density and the conservation of the fabric and legibility of the historic landscape character. Development should also be designed to enhance the local distinctiveness and respect the local vernacular in terms of its scale and architectural form.

Landscape Sensitivity Study (2017 Update)

The LSS focuses on the growth at the 'Main Service Villages', Wombourne being one of them. The Wombourne focus area is split into Land Cover Parcels (LCPs). The site lies within the LCP WM13 which extends up to the Staffordshire and Worcestershire Canal in the north-east, Wombourne built area to the south-east, public footpath 'Trysull and Seisden 13' to the south-west, Woodford Lane to the west and Smestow Brook corridor to the north-west.

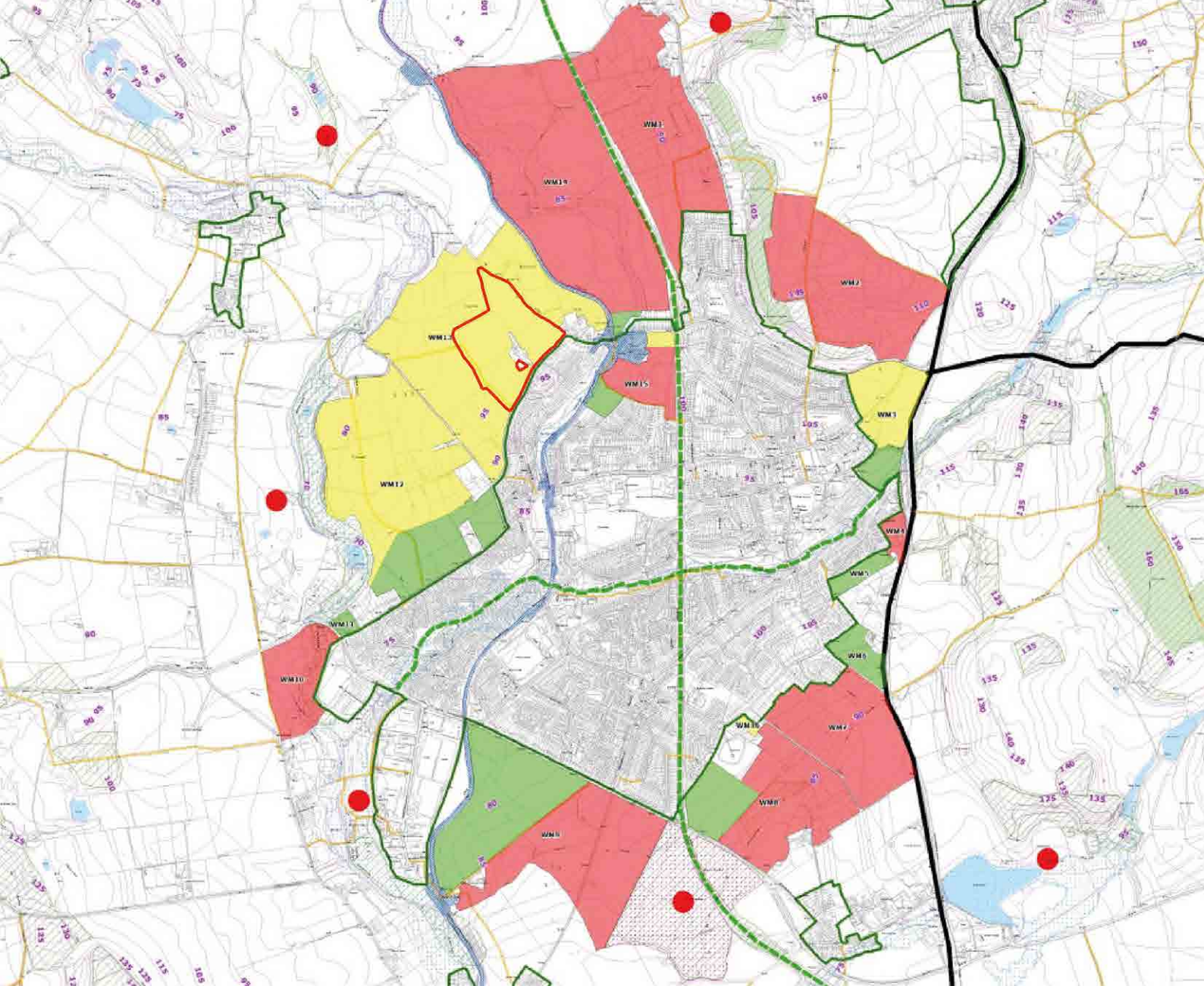
WM13 is a large LCP comprising medium to large fields with boundaries delineated by hedgerows. The land falls gently to the Smestow and forms the shallow valley side. The LCP is bordered on its south eastern and south western edges by quiet lanes. The north eastern part of the LCP is bisected by Trysull Road.

Key characteristics, as recorded within the LSS, pertaining to the site and its surrounding include:

- A varied rolling/undulating topography
- Streams in shallow valleys
- A well-defined irregular field pattern
- Arable and pastoral farming
- Network of narrow lanes, often with hedge banks
- Large numbers of hedgerow oak and ash
- Small, irregular patches of ancient woodland
- Clustered settlement pattern of scattered farmsteads and roadside dwellings
- Traditional red brick farmsteads and dwellings with clay tile roofs

The LSS notes that the LCP has retained some structure but there has been some hedgerow loss resulting in field consolidation. There are urban influences present from the settlement edge along Bratch Common Road but the area generally retains a rural feel.

WM13 has been assessed to be a landscape of medium sensitivity. The LSS states that the LCP has some potential to accommodate housing development in some situations without significant character change or adverse effects.



Landscape Sensitivity Plan

 Site Boundary

Landscape Sensitivity Rating:

 High

 Medium

 Low

2.5. Land Use and Settlement Pattern

The nearest major settlement to the site is Wolverhampton (population: 210,319; 2011 census). Wolverhampton's centre lying approximately 7km from the site's north-eastern boundary. Wolverhampton is not visible from the site. However, the site's south-eastern boundary adjoins the village of Wombourne which is considered to be a 'Main Service Village' within South Staffordshire. Wombourne being in such close proximity, is visible from the site.

It is predominantly a pastoral landscape, outside the urban areas. The Staffordshire and Worcestershire Canal along with Monarch's Way provides recreational use to the wider area.

The settlement pattern in the area reflects the transport corridors. Smaller built up areas are generally ribbon development concentrated around junctions of roads and larger built up area being situated off the A449, generally to the west of the A road. The site is well related to the settlement to the south and south-west.

2.6. Tree Cover

Tree cover within the immediate setting comprises areas of woodland dotted throughout the landscape with wide woodland belts being a common feature in particular along the Smestow Brook. Linear tree belts are also found along Monarch's Way - a long distance path along the disused railway line.

NCA 61 records that interlocking blocks of mixed woodland and old orchards provide a well-wooded landscape and conifer plantations combine with parklands to give an estate character generally to the east of Wombourne.

The field pattern in the landscape is defined by the trees within the hedgerow field boundaries. Overall, the fields are generally devoid of individual trees. Tree cover on the site is limited to hedgerow trees in the field boundaries. Close to the site, trees are common along the watercourses and within the back gardens of the residential areas of Wombourne.

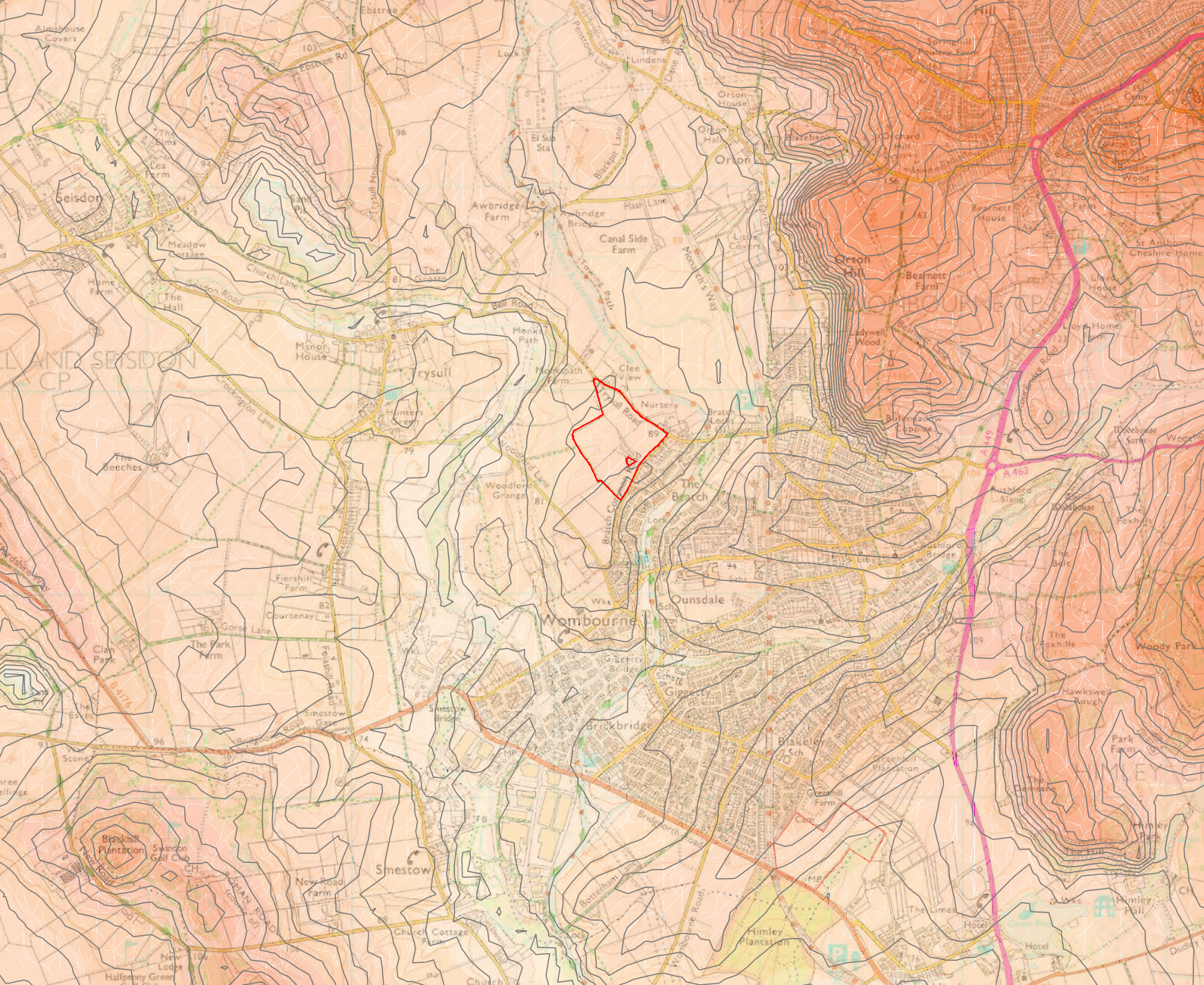
The HECA recommends the re-establishment of the historic hedgerows along their original alignments.

The Staffordshire Planning for Landscape Change states that “field corner planting would generally be an appropriate scale of new woodland”. The report further notes that “screening of incongruous urbanising landscape features could be achieved by well-designed and sympathetically placed woodland blocks. The visual influence of urban edges can be reduced by directing views with new woodland planting.”

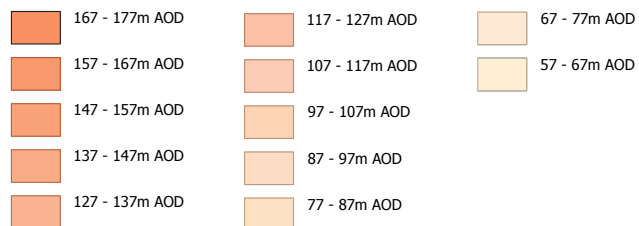
2.7. Landform

Landform is a key component of landscape character as it influences many aspects of how landscape appears and has been used over time. The site has a gently undulating landform ranging from 84m AOD to the north-east to 92m AOD to the south-west.

The wider setting of the site comprises a rolling landform with Smestow Brook forming the low-lying areas and rising up to the north-east and east. Public Right of Way (PRoW) 'Wombourne 16' is located on Orton Hill, one of the higher areas (163 AOD), located approximately 1.5km to the north-east of the site.



Landform of the Setting



2.8. Heritage & Archaeology

A Preliminary Archaeological and a Heritage study has been undertaken in relation to the site and surrounding area, which provides an indication as to the extent, survival and importance of archaeological, historic landscape and built heritage assets that could potentially be affected by development

Consultation with Historic England baseline data confirms that there are no designated heritage assets located within the boundary of the site.

Within the wider 1km search area there are the following designated heritage assets:

- One Grade II* listed building.
- 9 Grade II listed buildings.
- 2 Conservation Areas.

In respect to potential indirect impacts of future redevelopment of the site on heritage assets, proposals may result in change within the setting of the following designated heritage assets which may in turn result in an impact to their significance:

- Grade II* The Bratch Water Pumping Station (NHLE Ref: 1232411);
- Staffordshire and Worcestershire Canal Conservation Area; and
- Grade II Staffordshire and Worcestershire Canal Bratch Locks, Bridge number 47 (Bratch Bridge), Bridge number 48 (Upper Bratch Bridge) and associated Tollhouse (NHLE Ref: 1232421).

Whilst setting is a contributing factor to the significance of each asset, important setting elements in respect to The Bratch Water Pumping Station and Bratch Bridge, Upper Bratch Bridge, Bratch Locks and the former tollhouse are predominantly restricted to their immediate canal-side setting which is defined by the Conservation Area boundary. It is anticipated that there would be no change to their settings and subsequently no harm to their significance.

With regards to Staffordshire and Worcestershire Canal Conservation Area, it is anticipated that impacts of 'substantial harm' are extremely unlikely; potential impacts being limited and of less than substantial harm at worst.

In respect of potential indirect impacts to The Bratch Water Pumping Station and Bratch Lock and its bridges and tollhouse, which could be experienced as a consequence of changes within their settings such as the development of the site, it is anticipated there would be no change to their settings and subsequently no harm to their significance.

Opportunities

- The inclusion of a standoff to the north east corner of the site would maintain current views out of the Conservation Area towards the site.
- The conservation of existing hedgerow boundaries and trees around the site perimeter should retain the traditional means of enclosure around the site, helping to conserve its wider semi-rural character and cushion the impact of any new development in views southwards from the canal towpath, as the canal extends northwards.



Bratch Locks

3. SITE ASSESSMENT

The following sections within this chapter summarise the site's technical constraints and opportunities, illustrated by the plan opposite.

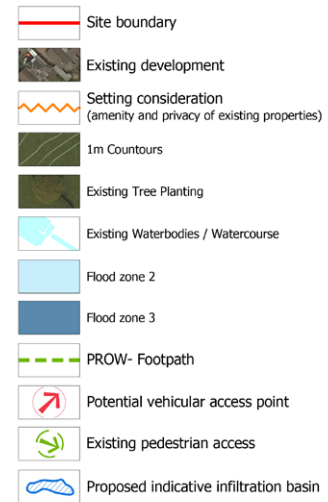
3.1. Access & Highways

Bratch Lane currently narrows to a single track as it passes over the canal bridge. The development strategy includes the provision of a shuttle signal scheme over this section of Bratch Lane, which would improve highway safety, facilitate pedestrian movement could unlock future development within the wider Wombourne area.

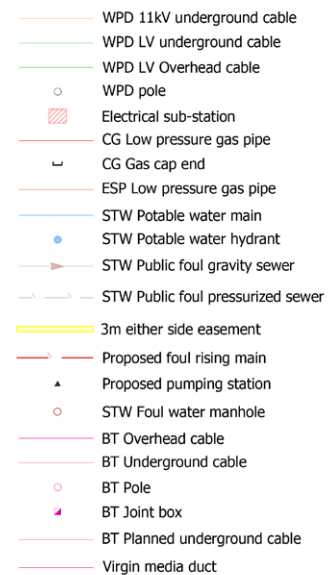
There is an opportunity to widen Bratch Common Road, which is currently of poor quality and of insufficient width in places, either within the development site frontage, or in conjunction with potential adjacent developments.

Whilst there is currently a limited pedestrian footway on Bratch Common Road, the development strategy would provide a facility on the site side of the road. This would connect to the existing network and could be undertaken in conjunction with potential adjacent developments to provide a continuous pedestrian facility along the entirety of Bratch Common Road.

The severance between the site and Wombourne village centre/ local amenities can be overcome via improvements to the local Public Rights of Way (PROW) network and via the proposed pedestrian/cycle infrastructure, which facilitate movement between the site local amenities.



UTILITIES





3.2. Drainage & Flood Risk

A desk study of the flood risk and drainage aspects of the proposed development site has been undertaken. The site is wholly located in Flood Zone 1 and is at low risk of flooding from all other sources.

Smestow Brook is located 300m to the north west of the site and the Staffordshire and Worcestershire Canal is located approximately 130m to the west. Neither watercourses, are a risk of flooding to the site.

Due to the site levels, a pumping station and a foul rising main will need to be constructed to serve the site which proposes connecting into the existing public foul network on Bratch Common Road.

Development proposals will seek to accommodate the existing surface water flow paths and mitigate surface water flooding by ground re-profiling where necessary, whilst ensuring flood risk is not increased elsewhere.

Appropriate use of SUDs techniques, including suitable attenuation measures to restrict surface water runoff to greenfield rates, will ensure that the drainage design for the proposed development provides betterment in terms of surface water management.

3.3. Geo-Environmental

The site has remained largely unchanged since the initial 1882 mapping, with the exception of the development of a farmhouse and associated agricultural properties in the centre of the site in 1984. The remainder of the site is shown to comprise agricultural land.

No significant potential environmental or contaminative issues have been identified from the past and present use of the land adjacent to the site.

The site is underlain by superficial deposits of Till mapped in the north of the site, with glaciofluvial deposits recorded in the south. The Wildmoor Sandstone Member is recorded to underlie the entire site area. There is a potential for made ground to be present in areas where structures exist on site. The site is underlain by a principal aquifer and there is a Source Protection Zone (SPZ) for major abstraction 250m to the east of the site.

It is considered based on the information reviewed, the current and historical use of the site does not represent a significant risk to the environment and is suitable for the proposed end use of residential development with associated infrastructure. If any issues relating to potential contamination are identified on site, appropriate measures will be undertaken to reduce any risk posed to development.

3.4. Arboriculture

A desk study of the arboriculture of the proposed development has been conducted.

There are individual trees located on the site boundary and a few individual trees located on the field boundaries within the site.

Careful masterplanning and considerations to the site design will be undertaken during the planning of the development proposals, to ensure that impact on these trees is minimised.

Retained trees will be provided with adequate protection during construction work.

Where possible, the masterplan will provide areas for planting for the replacement of any trees that may be lost as a result of the development.

Following a review of the South Staffordshire Council tree preservation order (TPO) records, there are TPOs on trees within the site. Further consultation with South Staffordshire Council would be required to understand which trees have a TPO.

3.5. Ecology

An ecological assessment has been undertaken, involving a site visit and desk study. The desk study involved analysis of ecological records provided by Staffordshire Ecological Records Centre for 2km from the site boundary, and examination of satellite and OS maps.

The site comprises grazed improved grassland of low intrinsic ecological value with peripheral and intersecting hedgerows containing mature trees. There is a cluster of several farm buildings within the centre of the Site. There are two Local Nature Reserves, eleven non-statutory designated sites and three ancient woodlands within 2km of the Site; none are considered likely to be adversely impacted by the development due to their distance from the Site.

Hedgerows are a priority habitat and careful masterplanning and considerations to the Site design will be undertaken during the planning of the development proposals, to ensure that potential impacts on hedgerows are minimised. There are habitats within the site that could be suitable to support protected species including badger, bats and birds. Preliminary assessments of the buildings and trees within the site identified two trees and one building that have the potential to support roosting bats.

Further ecological surveys will be undertaken to inform necessary mitigation measures for protected species, which would then be incorporated into the development. The proposed development offers opportunities to retain and enhance local biodiversity.

3.6. Utilities

An incumbent utilities search has been conducted to identify existing recorded services within the site boundary and the immediate vicinity. These searches have provided the following results.

Electricity

Records show that there is an overhead low voltage cable located within Trysull Road that crosses into the site boundary in the north of the site. The cable follows the site boundary and crosses out of the site further to the south. The cables travel overhead and underground along Bratch Common Road. There are overhead and underground cables that cross into the site boundary in the south-east which feed the existing farm buildings and residential property which is not included within the site. There are electricity apparatus located within the vicinity of the site which could potentially provide a connection to the proposed development. Further consultation with the electricity provider is required at the detailed design stage to determine the point of connection.

Gas

Records show that there are low pressure gas mains located within Bratch Common Road. There are no gas mains located within the site boundary. There are gas mains located within the vicinity of the site which could potentially provide a connection to the proposed development. Further consultation with the gas provider is required at the detailed design stage to determine point of connection.

Potable water

Records show that there are potable water mains located along Bratch Common Road and Trysull Road. There are no potable water pipes that cross into the site boundary. The potable water pipes within the vicinity of the site would potentially be able to provide a connection to the proposed development. Further consultation with the potable water provider is required at the detailed design stage to determine point of connection.

Telecoms

There are BT cables located along Bratch Common Road and Trysull Road. There are overhead cables that cross into the site and run parallel to Bratch Common Road before crossing out of the site in the south-east. There are Virgin Media apparatus located along Bratch Common Road. Virgin Media apparatus is located within the site boundary which supply Little Woodford farm. There are other BT and Virgin Media apparatus located within the vicinity of the site that could potentially provide a connection to the proposed development.

3.7. Soils & ALC

A desk-based review of Agricultural Land Classification (ALC) has been undertaken.

The site area is approximately 13 ha comprising four agricultural fields and existing farm buildings.

ALC is a standardised method for classifying the quality of agricultural land based upon the type and level of agricultural production it can potentially support. Land is placed into five Grades with Grade 1 being ranked as Excellent and Grade 5 ranked as Very Poor. Best and Most Versatile (BMV) land comprises land of Grades 1, 2 and Subgrade 3a, and is afforded a degree of protection in planning policy.

The Provisional mapping identifies the land within the site as Grade 2, immediately bordered by units of Grade 3 and Urban areas. Therefore, from the Provisional ALC it should be assumed that the land within the site is of BMV quality.

The Provisional mapping also shows agricultural land quality in the Shropshire and South Staffordshire area to be characterised by areas of Grade 2 (Very Good) and Grade 3 (Good to Moderate) agricultural land and Urban areas.

The potential loss of BMV land should be considered against the site being a logical extension to the existing residential development in the area, capable of utilising the local amenities, services and infrastructure; which is preferable to the development of isolated areas of agricultural land elsewhere. In line with the NPPF, the site also incorporates the re-development of the existing farm and hardstanding (brownfield land), partially directing development away from agricultural land.

Although the land within the site would no longer be in agricultural production, the area of unsealed land (assumed to be 50 % of the area removed for residential dwellings combined with the open space areas and residential gardens) has the potential to support the development through sustaining regulatory (i.e. carbon sequestration and flood attenuation), supporting (i.e. habitat creation) and cultural services (i.e. recreational value). This would be promoted by the maintenance of soil quality through the implementation of industry good practice soil management measures during the construction period.

3.8. Noise Assessment

A desk-study review of potential noise aspects associated with the proposed development site has been undertaken and has generated the following considerations.

The main source of noise is expected to come from Trysull Road which is adjacent to the north-eastern boundary of the site and had a 60-mph speed limit.

Another potential noise source is Bratch Common Road which borders the south eastern boundary of the site and has a 40-mph speed limit.

Both of these roads are single carriageway and are unlikely to carry high volumes of traffic, therefore the noise impact from local road is considered not to be a significant source of noise to the development.

In order to achieve guideline levels of noise, it may be necessary that proposed dwelling will be orientated with gardens in the screened side or garden fencing is used to screen the external living noise.

To ensure that there are no significant noise impacts on the proposed development, careful masterplanning will be undertaken, which will include consideration of the orientation of houses and designing garden fencing to screen any potential noise.

3.9. Air Quality

A qualitative air quality screening assessment has been undertaken for the proposed development site.

There are a number of AQMAs within the South Staffordshire District Council (SSDC) administrative area, however, these are not close to the proposed development site. The closest AQMAs are within neighbouring City of Wolverhampton Council (CWC) and Dudley Metropolitan Borough Council (DMBC), approximately 2.5km northeast and 3.7km southeast respectively.

The background levels of NO₂ and PM₁₀ are well below the background air pollutant concentration objectives according to the DEFRA Local Air Quality Management (LAQM) web pages.

It is recommended that a detailed air quality assessment is undertaken to determine any potential impacts the proposed development may have on existing and proposed sensitive receptor locations, associated with development-generated traffic and impacts associated with construction dust.

Any impacts identified would be assessed to determine the most appropriate mitigation measures, to ensure there are no adverse impacts to air quality as a result of the proposed development.



3.10. Landscape Appraisal

The site is of an irregular shape; however, the site boundaries are well defined:

- Trysull Road to the north and north-east.
- Bratch Common Road to the south and south-east.
- Private lane off Trysull Road and associated field boundary to the north and north-west.
- Public footpath 'Trysull and Seisden 13' to the south-west.

Within these defined boundaries, the site includes all built form present bar the south-western most property and its associated garden boundary demarcated by a hedgerow and a line of purple beech trees.

The site adjoins the built-up area of The Bratch to the south and south-east, which is an area of Wombourne lying to the west of Staffordshire and Worcestershire Canal. The countryside lies to the north, north-east and the west, although interrupted by ribbon developments along the many roads that criss- cross the landscape.






The site follows the field pattern, generally made up of medium to large sized fields and therefore the site is of an irregular shape. The site apart from the built form, all of which lie along the private lane off Bratch Common Road, comprises four pastoral fields. The central boundary between the fields and the outer boundaries consist of dense well managed hedgerow with occasional hedgerow trees particularly oaks. The remained of the internal field boundaries are post and wire fencing.

The landform of the site is gently undulating with a noticeable dip within the north-eastern corner of the site. Tree cover on site is limited to hedgerow trees with the fields remaining open, which is characteristic of the area. The hedgerow along Trysull Road and Bratch Common Road and on site are well-managed and trimmed low.

Public Right of Way (PRoW) Trysull and Seisden 13 runs along the site's south-western boundary. The ProW starts further west from Woodford Lane and end at Bratch Common Road. There are no other PRoWs on site.



Landscape Appraisal Plan

-  Site Boundary
-  Settlement
-  Public Right of Way
-  Green Belt
-  Canal





Baseline: Landform

-  Contours
-  Slope




Baseline: Vegetation on Site

-  Tree Cover and field trees
-  Hedgerow

Landscape Edge Characteristics

-  North-east: Trysull Road
-  South-east: Bratch Common Road
-  North-west: Private lane off Trysull Road
-  South-west: Public footpath

Local Visual Analysis

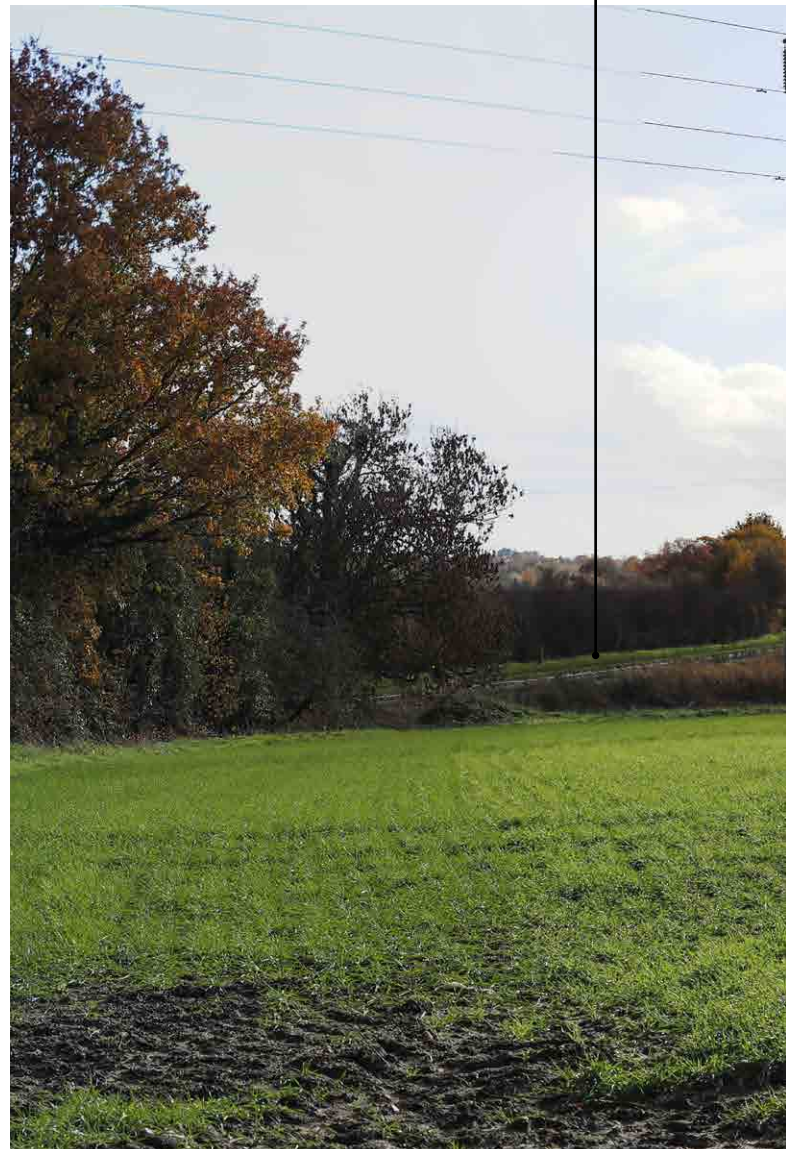
-  Clear/open Viewline
-  Filtered/Partial Viewline
-  Truncated Viewline

3.II. Views and Visual Amenity

The site is gently undulating, providing expansive views from the south-west on higher ground looking across the site and beyond to the countryside. The views tend to showcase extensive tree cover with well treed ridges being a common feature as characteristic of NCA 66.

Views of the settlement edge at Bratch Common Road are seen from the PRoW 13 being in close proximity to the site. Views from further west along the same PRoW are heavily filtered by intervening vegetation affording glimpsed views of the site. Due to the landform and the existing vegetation views from further afield including the Bratch Locks and Monarch's Way are limited. Along the canal tow path views of the site are generally absent due to the existing built form, landform and vegetation. However, occasionally filtered views of the site are seen through the gaps in vegetation.

Staffordshire and Worcestershire Canal



Off site - View south-west from Awidge Bridge towards the site



On site - View north-east across the site towards Trysull Road



Site



On site - View north-west across the site towards Trysull

Trysull



Site



Site

Off site - View from Staffordshire and Worcestershire Canal looking west through the cricket ground towards the site



Whitehouse Plantation (135m AOD) 3km from site

Black Hill Plantation (135m AOD) 3km from site



Off site - View from Staffordshire and Worcestershire Canal looking west towards the site



Site



Off site - View from public footpath looking south-east towards the site towards



Site



4. DESIGN PRINCIPLES & CONCEPT

The Concept Masterplan, shown opposite, demonstrates the designed spatial arrangement for development at Bratch Common Road, Wombourne.

The scheme is shaped by the following design principles:

- Provision of approximately 6.30 Ha of residential development that equates to approximately 250 new homes.
- Creation of a distinct neighbourhood, situated within a network of green space that provides a multifunctional green infrastructure resource for people and wildlife.
- Access to the site would take the form of two priority junctions from Bratch Common Road. The existing farmhouse access will be retained as a gated private access.
- Provision of a well-connected and permeable movement network that encourages active travel and enables vehicular access and circulation within the development.
- The arrangement of development blocks to ensure overlooking of public areas and green spaces.
- Placement of focal spaces within the primary movement network enhance legibility and encourage community interaction.
- Retention of existing public rights of way that are integrated within a network of other informal footpath routes. This network will be located within areas of open space, connecting with surrounding routes and the proposed residential streets and spaces.
- Sensitive treatment of the northern edge, with dwellings set back from, yet positively overlooking, this tranquil tree lined area.
- Management of surface water run-off through the integration of a sustainable drainage strategy, including a series of landscaped attenuation features set within the green infrastructure network.
- A strong frontage along Bratch Common Road, with appropriate layout and orientation to ensure the privacy and amenity is respected.
- Approximately 5.73 Ha of public open space, including attenuation features.





4.1. Landscape Strategy

The objective of the Landscape Strategy is to set the development into the host landscape in a manner that achieves a sympathetic and successful assimilation in the countryside at the settlement edge.

There are three key objectives for Landscape Strategy:

- to make an important contribution to integrating the development with the host landscape of the immediate setting.
- to create a public asset of attractive green space to serve the needs of the development.
- to ensure the effects of the development are limited and contained in a manner that makes an attractive and effective new edge to the settlement.

Existing components: Public Footpath, field pattern, hedgerow and trees, will give form and structure to the new Green Infrastructure (GI). These green spaces and existing components will be connected to form a network of biodiverse planted linked spaces and habitats. It will also provide linkage to other GI assets beyond the site. These components will be retained, and the development arranged around it, to provide strategic and meaningful space with a strong sense of place.

There will be extensive areas of new publicly accessible open green space within the development including provision for a play area. The route of the public footpath will be retained. PRoW Trysull and Seisdenr3 will follow the existing hedgerow line and will be retained in open green space.

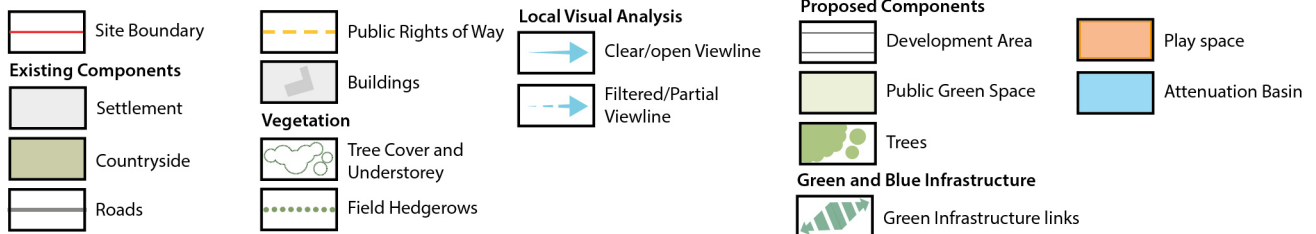
The development will be embedded within the green spaces and set back from the road, similar to the existing style, thereby creating a strong relationship with the settlement edge. New woodland planting along the northern and north-western extent of the site will create a strong relationship with the countryside and would also follow the guidance recorded within Staffordshire Planning Guidance. Woodland belts are also a characteristic feature of NCA 66.

Further trees will be planted within the south-western and north-eastern green spaces to add to the wooded character of the landscape and the views experienced.

The Sustainable Urban Drainage system will require a shallow storage basin to be created to attenuate rainwater, around the low-lying area of the site within the northern corner. This feature has been located to serve drainage operational requirements. It would have a biodiversity role as well as providing an enhancement to the development. The basin will be designed, planted and managed in a manner that serves as a public amenity.



Landscape Strategy Plan



5. IS THE SITE DELIVERABLE?

To be considered deliverable, sites should offer a suitable location that is not constrained by environmental or technical issues; and be readily available and achievable with a realistic prospect that new housing will be built within the early part of the Local Plan period.

The technical analysis referred to within this Vision Document and supporting documentation has demonstrated that the site is wholly deliverable, such that its allocation for residential development would be justified and substantiated by sound evidence.

The site is achievable and development can be delivered at an early stage in the emerging plan period. This is illustrated within the delivery trajectory (right). This is based on delivery by a single sales outlet, however, the site has the potential to facilitate simultaneous delivery by two housebuilders. The proportion of affordable housing assumes 40% of the dwelling total, based on Policy H2 of the South Staffordshire Core Strategy.

The site is viable and can deliver and support the physical infrastructure required to meet the needs of new residents. This will include affordable housing and open space, in addition to planning obligations being facilitated where required to improve local infrastructure.

Year	Market	Affordable	Total
2022/23	30	20	50
2023/24	30	20	50
2024/25	30	20	50
2025/26	30	20	50
2026/27	30	20	50
Total	150	100	250



6. SUMMARY OF ASPIRATIONS

This document has set out a vision and overview of the site and its context, emerging design principles and a masterplan concept for sustainable development.

In summary, the proposals will deliver the following key benefits and qualities:

- Approximately 250 new homes forming a new neighbourhood that includes a mix of dwelling types and tenures.
- A new development that is structured around an attractive green space resource and movement network that promotes health and active lifestyles.
- A distinctive, legible and connected place that is informed by best practice urban design principles and shaped by the retention of important site features.
- Promotion of a safe, cohesive and integrated community with excellent connectivity to the existing settlement.

**BARTON
WILLMORE**