



PLANNING AND DEVELOPMENT CONSULTANTS

A New Development Strategy for South Staffordshire 2018-2038

The Local Plan Review Preferred Options - November 2021

LAND AT DAM MILL ADJACENT 1 BIRCHES ROAD- CODSALL-WV82JE SHELAA Ref. 221

Mr & MRS N. MACHIN

1. I refer to the above consultation and confirm that I act for the joint owners of the land identified above. The land concerned has been put forward for consideration previously in the SHELAA (parcel numbered 221) and categorised as “*potentially suitable*”
2. In general terms, it is considered that the Council’s approach continues to place far too much emphasis on the “strategic development locations”, most particularly proposals SA2 (Cross Green) and SA3 (Linthouse Lane). It now appears that SA2 only “safeguards” the land for the potential rail-based parkway with no requirement for it to be provided (in contrast to previous Infrastructure Delivery Plan Plan’s implicit indications). The release of green belt with assessed “very high” harm in this location appears to have far less justification now in the context of the proposed “infrastructure led” approach. Moreover, these large allocations put the delivery of a large part of the new housing requirement firmly in the hands of the larger developers, who will consequently potentially dictate supply. It is considered that the strategy should instead seek to deliver more growth around the edges of settlements in locations which are already sustainable and deliverable, such as in Codsall.

3. In addition, it is noted that the proposed strategy does not allow for any new safeguarded areas of land. In accordance with paragraph 140 of the NPPF, the strategy should provide for further Green Belt release will be required beyond 2038 to meet future development requirements to meet needs. Safeguarded land should continue to be identified within the higher Tier settlements, including Codsall.
4. In relation to the specifics of my client's land, it is noted that the Site Proforma in Appendix 3 of the relevant Topic Paper still continues to refer to the green belt harm as "Moderate-high" and to the landscape sensitivity as "moderate".
5. It is noted that the Green Belt Assessment classifies the harm as "**Moderate-High**" for the overall parcel (ref S46B) of 280 hectares. However, the commentary makes the important points that more limited release of land that retains a clear settlement gap, retaining the integrity of the river corridor as a separating feature, would weaken the integrity of surrounding Green Belt land "*to a lesser extent*". That assessment is endorsed and any assessment if the above land was considered individually would have to be that the harm to the green belt would be moderate at worst.
6. It is also noted that the whilst the Landscape Sensitivity Assessment rates the sensitivity of the site, and other land within Area Ref SL34 (250 has in extent), as "*moderate*", "*.. due to the wide variations in ratings across the criteria.*"
7. However, the sensitivity of the landscape character of Site 221 itself was assessed by Wardell Armstrong in the 2014 report (submitted at that time), as being "**low**". The Site is extremely well enclosed, with built development screening views from the north and east, trees screening views from the south and topography screening views from the west. It also has the potential to improve the existing settlement edge, creating a more well-defined edge with increased vegetation, bound by the River Penk and surrounding woodland to the south which would act as a strong limit to development.

- 8.** Moreover, there are no publically accessible locations from which views of Site 221 are available. Views from Birches Road and Codsall Road to the east are screened by built development and vegetation, and views from Keepers Lane to the west are screened by local changes to topography. There are no public rights of way in proximity to the site.
- 9.** The Site Proforma also notes that the highway authority has concerns re. regarding visibility requirements and the proximity of a bend in the highway. An initial assessment on behalf of my clients showed these concerns could be overcome and further information in this regard will follow.
- 10.** The proforma also notes that a small part of the site is within Flood Zones 2&3 but that this is a mitigable concern and further information in this regard will follow.
- 11.** Codsall/Bilbrook, as one of the identified Tier 1 settlement and recognised in the GBHMA Strategic Growth Study as a growth location close to employment opportunities and with good public transport links to the conurbation, could provide for an additional scale of new housing beyond that set out in the currently preferred Strategy. This would be a far more balanced approach and one more consistent with national green belt and related Policies.
- 12.** There is little doubt, based upon the report submitted in 2014 by Wardell Armstrong, that Site 221 can deliver the residual housing requirement (see attached illustrative layout prepared at the time and in need of up-dating to be current Policy compliant). Moreover, as above, the site has readily recognisable and defensible long-term boundaries appropriate to the Green Belt and can accommodate a development which would have minimal visual impact. There is good access to public transport, with bus stops located in close proximity, and a range of local services (including a neighbourhood shop and a school) within near walking distance.

13. In summary:

- i) The chosen Strategy should give consideration to the further potential of Tier 1 villages in meeting housing and infrastructure needs which increases choice and flexibility of supply
- ii) The chosen strategy should provide for safeguarded land concentrated in the higher category villages
- iii) development of the above site would have limited visual and green belt impact and is well served by public transport and local facilities in a location in proximity to the conurbation edge and thereby close to the source of unmet need.
- iv) The site should be allocated for future housing development in the Review or, at the very least, identified as “safeguarded” for longer term development.