



PLANNING AND DEVELOPMENT CONSULTANTS

A New Development Strategy for South Staffordshire 2018-2038

The Local Plan Review

Preferred Options - November 2021

LAND AT REAR OF MELWOOD - COVEN ROAD/TINKERS'S LANE -BREWOOD – ST19 9DE – YOUR SITE REF. 616

Mr D. CONN

1. I refer to the above consultation and confirm that I act for the owner, as above, of the land identified on the **attached plan**.

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'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 Brewood.

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 Brewood.
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 "high".
5. From the Green Belt Study, the above assessment is primarily due to separation from the village by The Pavement Road and the watercourse. However, this assessment is contradicted by the commentary in the SHELAA regarding this particular parcel of land, as above. This is as a consequence of Parcel SL32L extending to some 71 hectares, making it impossible to distinguish between more discrete areas. Any harm to the Green Belt from built development on my clients' land will, in our view, be negligible.
6. Regarding landscape sensitivity, it is also noted that the Landscape Sensitivity Assessment (Area Ref.SL75s1) adjudges overall sensitivity of this landscape area to residential development to be "**high**". This is stated to be "*..due to the combination of historic field patterns present, which are important to landscape character and contribute to scenic quality and biodiversity, its small scale, occasionally intimate character with relatively strong rural perceptual qualities, and the strong visual and historical relationship with the adjacent edge of Brewood, which includes parts of its Conservation Area.*"

7. However, my client's land is clearly distinguishable from the remaining 95 has., within the Parcel concerned, by the fact that it exhibits different characteristics from those described above. Any visual harm from built development on my clients' land will be negligible.
8. The land concerned has been put forward for consideration previously and categorised as "*potentially suitable*" in the SHELAA, under ref. 616. The commentary with the SHELAA entry is generally endorsed. In particular, it is agreed that the "*...site does not read as physically isolated from the rest of the village*". A public footpath in the highway verge is also provided along Coven Road to and beyond the junction with Port and Tinker's Lanes providing safe pedestrian access to the village centre.
9. The Site Proforma also notes an "initial concern" regarding visibility requirements for any future access to the site. This is not considered to be an issue in view of the frontage of the site to Coven Road and further information in this regard will follow.
10. My client, therefore, considers that his land should be allocated for future housing development in the Review or, at the very least, identified as "safeguarded", particularly in view of how it "*reads*" as part of the village; the minimal harm to Green Belt considerations that would result from built development, and its limited visual sensitivity.