



PLANNING AND DEVELOPMENT CONSULTANTS

## **A New Development Strategy for South Staffordshire 2018-2038**

### **The Local Plan Review**

### **Preferred Options - November 2021**

### **LAND AT WHITEHOUSE LANE – CODSALL WOOD - SHELAA SITE REF. 261**

**Mr A N WAUGH**

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1. I refer to the above consultation and confirm that I act for the owner, as above.
  
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 Codsall Wood.

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 needs.
4. Furthermore, the change of approach whereby small site allocations in Tier 4 villages are no longer being considered “..as current monitoring information suggests these allocations are not required to meet the national requirement for 10% of housing growth to be delivered on sites of less than 1 hectare”, is considered to be flawed. It is not known what is meant by “current monitoring information” but what is clear is that the identification of sites of this kind around the larger villages has produced some site proposals which propose new green belt and open countryside boundaries which do not relate to physical features and proposal which make no contribution to infrastructure or any other settlement need – site proposals 272 and 576 in Kinver and site proposals 379 and 610 in Wheaton Aston are examples.
5. The land concerned in Codsall Wood has been put forward for consideration previously in the SHELAA – numbered 261 – categorised as “*potentially suitable*”. however, it is noted that it is not evaluated in either the Green Belt Study or the Landscape Sensitivity Assessment.
6. If it had been evaluated, it is considered that the conclusions would have been that the development of this discrete site with defensible boundaries, would have limited green belt impact and minor landscape sensitivity. The development of this site would amount to a “rounding off” of the settlement in this location.

7. In the context of the above, objection continues to be made to the categorisation of Codsall Wood as Tier 5 in the rural services and facilities audit 2021. The village has a Community-owned pub (Pendrell Arms); events facility (Pendrell Hall) and golf course/driving range and is within easy reach of Codsall and its railway station. The site is also within easy walking distance of bus stops on Wood Road providing public transportation access, inter alia, to the conurbation.
8. Whilst the generality of concentrating new development where it can assist in meeting infrastructure and related needs, is supported, this should be just one consideration in the strategy and site selection process. It is necessary and in accordance with national Policies to have regard to all material considerations.
9. Most particularly, this land parcel “*fits*” the NPPF requirement (para. 69) to accommodate at least 10% of the housing requirement on sites no larger than 1 hectare. Such sites are assessed in the above as making an important contribution to meeting housing requirements and are “*..often built-out relatively quickly..*”. They also provide an influx of new residents into a community which can assist in maintaining existing services.
10. In summary:
- i) Objection is made to the categorisation of Codsall Wood as a Tier 5 village in view of the facilities available.
  - ii) The potential of my client’s land in meeting housing needs should be fully evaluated in the context of the necessity to provide 10% of the housing requirement on sites no larger than 1 hectare.
  - iii) At the very least, the land should be 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.