

# SOUTH STAFFORDSHIRE LOCAL PLAN 2018-39 PUBLICATION PLAN

LAND EAST OF BILBROOK



**BLOOR HOMES**<sup>®</sup>

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# 1. Introduction

- 1.1 This representation, submitted on behalf of Bloor Homes Ltd, responds to the Regulation 19 'Publication Plan' consultation document and accompanying published evidence, having regard to the national and local planning policy context. It relates specifically to Land East of Bilbrook where Bloor Homes has secured land interests. A site location plan is attached at **Appendix 1**.
- 1.2 The representations are framed in the context of the requirements of Local Plans to be legally compliant and sound. The tests of soundness are set out in the National Planning Policy Framework (NPPF), paragraph 35. For a Development Plan to be sound it must be:
- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet 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;
  - **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
  - **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
  - **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the Framework and other statements of national planning policy, where relevant.
- 1.3 These representations also give consideration to the legal and procedural requirements associated with the plan-making process.
- 1.4 Chapter 3 of these representations provides comment in respect of the proposed spatial development strategy, Chapter 4 provides support for the Strategic Development Location on land east of Bilbrook, Chapters 5 – 11 provides Bloor Homes' views on the proposed development management policies and Chapter 12 provides an overview of the proposal and consideration of the Council's site selection process.

## 2. Planning Policy Context

2.1 Bloor Homes supports South Staffordshire District Council in progressing with a review of the South Staffordshire District Plan as required by Policy SAD1. This provides the opportunity for the Council to comprehensively review the following matters:

- South Staffordshire's own objectively assessed housing need and the potential for housing supply within the District (including existing safeguarded land identified through the Site Allocations Document) to meet this need.
- The potential role of housing supply options within the District to meet unmet cross boundary needs from the wider Greater Birmingham Housing Market Area (GBHMA), including from the Black Country.
- Employment land requirements for South Staffordshire
- South Staffordshire's potential role in meeting wider unmet employment needs through the Duty to Co-operate.
- The appropriateness of the existing settlement hierarchy and the strategic distribution of growth in light of new housing and employment needs.
- The need for further additional safeguarded housing and employment land for longer term development needs, and the role of safeguarded land in meeting housing shortfalls across the GBHMA, including South Staffordshire's own needs.
- Gypsy, Traveller and Travelling Showpeople provision.
- A comprehensive Green Belt Review undertaken jointly with the Black Country authorities, to inform any further Green Belt release to accommodate new development within the District.

2.2 The National Planning Policy Framework (NPPF 2021) requires local planning authorities to keep policies in their Local Plans up to date by considering a review at least once every five years.

2.3 Bloor Homes supports the Council's proactive approach in continuing with a review of the Local Plan to ensure that an up-to-date policy framework exists with the District to guide growth to 2039 and to ensure that development is genuinely plan-led.

- 2.4 The Preferred Options consultation document follows the identification of the Council's preferred spatial housing strategy in October 2019 and preferred allocations and policy directions in November 2021, which identified a proposed approach to delivering infrastructure-led development in line with settlement hierarchy and larger urban extensions focused to the north of the Black Country conurbation.
- 2.5 The Publication Plan identifies proposed site allocations to meet the spatial development strategy, including Land East of Bilbrook which is included as a proposed Strategic Development Location (Policy SA1).

### Evidence Base

- 2.6 The Publication Plan is supported by a broad range of evidence documents to be relied upon by the Council in formulating the Local Plan. Bloor Homes supports the identification of the Greater Birmingham HMA Growth Study (2018) and the SHELAA which were absent in the Preferred Options document.
- 2.7 The Greater Birmingham HMA Strategic Growth Study remains the latest comprehensive consideration of housing needs across the Greater Birmingham and Black Country HMA and provides a range of recommended options for meeting these needs, to be tested through individual LPA Local Plan reviews. This evidence has been subject to scrutiny as supporting evidence at the North Warwickshire and Solihull Local Plan EiPs and provides justification for the Council's intended contribution of 4,000 homes to assist in meeting the identified housing shortfall.
- 2.8 Bloor Homes has worked collaboratively with the Council, the City of Wolverhampton Council, other key stakeholders and the Council's masterplanning consultant to progress the Strategic Development Location proposal for Bilbrook. This has been informed by the preparation of site specific evidence prepared by Bloor Homes to supplement the Council's evidence base, including the preparation of a Strategic Transport Assessment published as part of the Council's evidence base.

### Vision & Objectives

- 2.9 The Vision is clear and succinct, however as presently drafted it doesn't appear locally relevant and contains no spatially specific elements.
- 2.10 Bloor Homes supports the strategic objectives identified. These are considered succinct, locally relevant and relate to the most important areas of change or protection within the District.

### 3. Development Strategy

- 3.1 Bloor Homes supported Spatial Housing Option G identified through the previous Strategic Housing Strategy and Infrastructure Delivery consultation undertaken in 2019. It is noted the proposed strategy represents a refinement of this option.

#### Policy DS1: Green Belt

- 3.2 In terms of the strategic approach to the Green Belt there is an acknowledgement within the Local Plan that there needs to be changes to the Green Belt boundary to accommodate growth requirements within the Plan period. It is agreed that Green Belt release is necessary to deliver a sustainable spatial strategy.
- 3.3 Bloor Homes agrees that exceptional circumstances exist for Green Belt release within the District to allow for sustainable development within the plan period.
- 3.4 The Publication Plan recognises that the character of South Staffordshire is directly influenced by the fact that around 80% of the District lies within the West Midlands Green Belt. The rural nature of the District also results in a lack of brownfield opportunities to meet any future housing needs beyond the proposed plan period.

#### Policy DS2: Green Belt Compensatory Improvements

- 3.5 Bloor Homes recognises that the Local Plan should set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land as required by para 142 of the NPPF.
- 3.6 The proposal for land to the east of Bilbrook identifies adjacent land, to remain in the Green Belt, to provide compensatory improvements. Such improvements will include the provision of public access as part of an overall green infrastructure strategy that will also secure improvements to environmental quality of this land.

#### Policy DS4: Development Needs

- 3.7 Bloor Homes generally supports the policy approach set out in Policy DS4 Development Needs however further commentary is set out below in respect of different components of the housing requirement arrived at.

#### *Local Housing Need*

3.8 The Strategic Housing Market Assessment (SHMA) 2021 sets out a minimum housing requirement of 254 dpa based on the Government's standard method, utilising the 2018 Affordability Ratios. Bloor Homes welcomes the publication of a SHMA update in October 2022 which reconsiders the minimum housing requirement having regard to the latest Affordability Ratios (2021) which results in a minimum net annual requirement of 241 dwellings.

3.9 The PPG is clear however that the standard method identifies a minimum annual housing need figure and does not produce a housing requirement figure recognising there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.

3.10 Paragraph 010 of the PPG (ID: 2a-010-20201216) states:

*"Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:*

- *growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);*
- *strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or*
- *an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;"*

3.11 Other circumstances that should be considered in respect of South Staffordshire District include the balance between homes and jobs created over the plan period.

3.12 These circumstances are considered in further detail below.

#### *Unmet Need from Neighbouring Authorities*

3.13 The unmet housing need arising from within the wider Greater Birmingham and Black Country Housing Market Area is well documented.

3.14 The Birmingham City shortfall was tested through the BDP EiP and an unmet housing need to 2031 of 37,900 homes was confirmed. Birmingham City Council has now commenced a review of the Birmingham Development Plan, with an Issues and Options consultation recently published. The Issues & Options document recognised that the BDP was unable to identify enough land to meet

all of Birmingham's housing need and there is still a need to work with neighbouring authorities within the Housing Market Area (HMA) to deliver a housing shortfall. Birmingham City Council has identified a shortfall of around 78,415 dwellings following an assessment of potential capacity from all sources. While this figure will be refined through Birmingham's plan making process, the shortfall to 2042 will remain significant.

- 3.15 The Black Country LPAs, were until this Autumn, undertaking a review of the Black Country Plan which is aligned to the timescales of the South Staffordshire Local Plan review. Evidence that informed the emerging Black Country Local Plan includes an urban capacity assessment. The Urban Capacity Review (2019) concludes that the amount of housing need which cannot be accommodated in the Black Country urban areas remains significant, at around 26,920 homes to 2038.
- 3.16 The Draft Black Country Plan 2018-2039, subject to consultation in 2021, identified a shortfall of 28,239 homes to be exported to neighbouring LPAs through the Duty to Co-operate.
- 3.17 The shortfall figures above do not take into consideration the 35% urban uplift introduced in December 2020 which would be applicable to both Birmingham and Wolverhampton.
- 3.18 Whilst the Black Country LPAs have now taken a decision to abort the joint plan-making approach to instead progress separate Local Plans, Bloor Homes considers the evidence remains valid and the Draft Black Country Plan reflects the latest published position in respect of the housing shortfall arising within the Black County.
- 3.19 Bloor Homes supports the Council's evidence led approach to providing an additional 4,000 homes to assist with meeting the unmet need. The figure of 4,000 appears reasonable and is justified by the Greater Birmingham and Black Country HMA Growth Study which represents shared evidence produced by constituent LPAs within the HMA.

### *Economic Uplift*

- 3.20 The SHMA sets out the broad economic consequences of the projected growth in Chapter 5. This references the Economic Development Needs Assessment 2020-2040 which forecasts an additional 4,824 jobs within the District between 2020 and 2040. This forecast is based upon methodologies of two of three forecasting houses that do not provide the basis to identify significant growth in the transport and storage sector.



- 3.21 The number of jobs likely to be created within South Staffordshire is likely to significantly exceed the 4,824 jobs forecast by virtue of committed development at the West Midlands Interchange (WMI) which will provide significant growth in the transport and storage sector. The WMI itself is projected to create 8,500 jobs of which 40% will be higher skilled and this level of growth would represent 17% of the Stoke-on-Trent and Staffordshire LEP's new jobs target to 2030.
- 3.22 At present the SHMA assumes that the projected growth of the working age population in South Staffordshire will grow by 6,618 people between 2020-2040. Whilst this is in excess of the forecast jobs growth outlined in the EDNA, Bloor Homes is concerned that the EDNA fails to realistically consider additional jobs created at WMI. Further consideration should therefore be given to whether the minimum local housing need figure derived from the standard method would support the necessary growth in the working age population to create a balanced community within South Staffordshire to support such jobs growth, even taking into consideration the 4,000 additional homes to meet unmet needs in the wider housing market area.
- 3.23 Further evidence is necessary to consider the balance between jobs and the working age population that would be necessary to satisfy the jobs demand. This may require an uplift in local housing needs identified.

#### **Policy DS5: The Spatial Strategy to 2039**

- 3.24 Bloor Homes supports the proposed spatial strategy to 2039 which recognises environmental capacity and seeks to make best use of existing infrastructure whilst recognising opportunities to delivery new infrastructure.

#### ***Settlement Hierarchy***

- 3.25 Bloor Homes supports the settlement hierarchy which considers the relative sustainability of villages within South Staffordshire District. The Tier 1 and Tier 2 settlements identified contain the widest range of services and facilities and by focusing new homes to these settlements would provide an opportunity to increase sustainability and self-containment. Codsall/Bilbrook and Penkridge appear to achieve the highest services/facilities rankings of all villages within the District.

#### ***Spatial Distribution of Housing Growth***

- 3.26 Bloor Homes supports the distribution of housing growth through the identification of strategic sites close to the Black Country and proportionate

growth focused to the villages, with the most sustainable villages, including Codsall/Bilbrook to deliver a higher amount of growth.

- 3.27 Housing growth also appears to be focused to the north of the District which aligns to the location of the Tier 1 settlements and the proposed employment strategy, that seeks to deliver thousands of new jobs in the northern extent of the District, including the freestanding and expanding employment site of i54 South Staffordshire within close proximity to Bilbrook.
- 3.28 Bloor Homes considers that the proposed development strategy not only assists in providing improved infrastructure but also has due regard to where housing needs exist, including within locations close to the Black Country conurbation where a significant shortfall in housing provision has been identified.
- 3.29 This strategy provides the opportunity to ensure that the necessary homes, along with supporting infrastructure, would be delivered in a timely and coordinated manner, to meet both the local needs arising from within the District, alongside those arising from the wider GBBCHMA.

#### **Policy DS6: Longer Term Growth Aspirations for a New Settlement**

- 3.30 Bloor Homes notes Policy DS6, which recognises the Council's aspiration to explore the potential for a sustainable, independent new settlement.
- 3.31 Policy DS6 recognises that such an option would not contribute to housing growth during the proposed plan period to 2039 which is agreed. A new settlement proposal, even if a suitable and viable option were to be identified, would take a long time to masterplan and facilitate and would need to be delivered alongside infrastructure on a scale much larger than a usual development.

## 4. Site Allocations

4.1 Bloor Homes has a number of land interests within South Staffordshire District. This representation relates to Land East of Bilbrook.

4.2 Bloor Homes recognises the importance of the four proposed strategic housing allocations in delivering the spatial strategy for the District to 2039. Due to the scale of the four sites, Bloor Homes supports the inclusion of site-specific policies to establish a vision for each site, alongside a requirement for a detailed masterplan and design code.

### Policy SA1: Strategic development location: Land East of Bilbrook

4.3 Bloor Homes has worked collaboratively with the Council, the City of Wolverhampton City Council, other stakeholders, infrastructure providers and the Council's masterplanning consultants in developing a shared Vision and set of Objectives for the new neighbourhood east of Bilbrook. This process has been informed by the preparation of a range of site-specific technical documents prepared by Bloor Homes and evidence produced by the Council.

4.4 Bloor Homes supports this Vision, Objectives and the resultant indicative Concept Plan contained within the Publication Plan. This will form the basis of further technical work and the preparation of a comprehensive masterplan and design code to inform a future planning application.

4.5 The emerging proposal for East of Bilbrook and a summary of technical work undertaken to date is set out in a Development Framework document, attached to this representation at **Appendix 2**.

4.6 In respect of Land East of Bilbrook, the proposed strategic housing allocation, provides an opportunity to deliver up to 800 dwellings alongside new infrastructure as identified in Policy SA1. The key infrastructure and design requirements set out in Policy SA1 are supported by Bloor Homes.

4.7 In light of the required Strategic Master Plan process progressing, as required by Policy MA1, it is requested that Policy SA1 refers to the delivery of up to 800 homes rather than specifying 848 dwellings as a minimum requirement as the appropriate number of homes that can realistically be achieved on site will need to be further refined further through the proposed masterplanning process outlined within the Local Plan.

4.8 Bloor Homes' land interests extend to all land within the proposed East of Bilbrook allocation, with agreements in place between the landowners and Bloor

Homes, providing confidence that a comprehensive and co-ordinated approach to development can be achieved in its delivery.

- 4.9 Bloor Homes can demonstrate the site is suitable, available and achievable, with further information provided within Chapter 12 of this representation and the Development Framework document attached at **Appendix 2**.

#### Policy MA1: Masterplanning Strategic Sites

- 4.10 Bloor Homes supports the Council's masterplanning approach to ensure high quality design. Bloor Homes confirms that a comprehensive and deliverable site-wide Strategic Master Plan will be prepared in respect of the Strategic Development Location at Bilbrook. This will be prepared in conjunction with the Council and informed through pre-application discussions.
- 4.11 It is the intention of Bloor Homes to prepare this site-wide Strategic Master Plan to inform a future planning application, recognising that this Masterplan will be adopted prior to the determination of any planning application.
- 4.12 The Strategic Master Plan will be prepared having regard to the requirements established through SA1 and the suite of proposed development management policies. In addition, the preparation of a masterplan and design code will provide opportunity for a collaborative approach including engagement with the local community and key stakeholders. Engagement with key infrastructure providers through the Local Plan review process and through the collaborative approach in preparing the Strategic Master Plan should result in refinement of the Infrastructure Delivery Plan (IDP) with the identification of infrastructure requirements, costs and phasing of delivery.

## 5. Delivering the Right Homes

### HC1: Housing Mix

- 5.1 The policy requires a flexible approach, recognising that the size and type of housing will change over the plan period and may be different across the District.
- 5.2 Bloor Homes considers that it is most appropriate for housing mix to be guided by market signals, as defined within the most up-to-date assessment of needs. The assessment of needs should be routinely updated across the 20-year Plan period. This ensures that housing mix is reflective of market-driven need.
- 5.3 Bloor Homes would wish to raise concerns that the proposed direction of travel appears overly prescriptive with all market housing proposals to include 70% of properties to comprise three bedrooms or less.
- 5.4 The SHMA utilises a long-term balancing housing market (LTBHM) model to determine future demand for housing. Bloor Homes would question whether this model does actually determine demand rather than need. The demand is often for a larger open market property than a household may need to provide additional flexibility e.g. working from home. Therefore, the approach to capping the percentage of larger homes, particularly open market homes, fails to provide a good level of flexibility to allow for changing market signals across the plan period or to address varying needs in different locations within the District.

### HC2: Housing Density

- 5.5 Bloor Homes supports the efficient use of land, in accordance with National Planning Policy and Guidance, and supports the flexibility provided by Policy HC2 to allow sites to be considered on a site-by-site basis, having regard to the prevailing local character, context and other planning policy requirements or opportunities for supporting infrastructure.
- 5.6 Due to the size of the site at Land East of Bilbrook and the lack of identified constraints, it is realistic to expect the delivery of an efficient scheme that could achieve a minimum average net density of 35-40dph. However, this would be achieved through the provision of character areas of varying densities and would be reflective of the character of surrounding development, including higher density development close to centrally located community facilities.

### HC3: Affordable Housing

- 5.7 Bloor Homes notes that for all major developments 30% of all homes are to be delivered as affordable housing. This appears to be broadly supported by the

2021 Stage 1 Viability Study which determined the current affordable housing requirement of 40% affordable provision is very unlikely to prove supportable on larger schemes with significant infrastructure costs. The Stage 1 Viability Study confirmed that affordable housing within the range of 20-30% is potentially relevant to strategic housing sites overall, assuming a maximum of £9,200/dwelling S106 costs and no additional CIL contribution.

- 5.8 It is recognised that a Stage 2 Viability Assessment builds upon the Stage 1 findings and includes updated assumptions on development costs and values, including a review of the four strategic sites. For Land East of Bilbrook the appraisal appears to assume approximately £14,000/dwelling S106 costs and no additional CIL contribution, although this is not clear within the site appraisals. Bloor Homes recognises that S106 costs will be subject to change at the planning application stage.
- 5.9 Viability is dynamic and the Council's evidence relates to a snapshot in time. Therefore, Bloor Homes supports the mechanism within Policy HC3 to submit a viability assessment at the application stage if it can be demonstrated that circumstances have changed. Such circumstances should include increasing infrastructure costs or changes to house prices or build costs.

#### HC4: Homes for Older People

- 5.10 The proposed policy requires a range of specialist housing to be delivered on site, both within market and affordable sectors. It is not clear whether this is a continuation of the Council's current approach of requiring 10% of all homes to be delivered as bungalows or other ground floor accommodation.
- 5.11 It is considered that a specific requirement for bungalows is not appropriate if instead the Council pursues a policy of requiring 100% of all homes to meet optional M4(2) requirements. M4(2) dwellings are described as making:

*"reasonable provision for most people to access the dwelling and incorporate features that make it potentially suitable for a wide range of occupants, including older people, those with reduced mobility and some wheelchair users."*

- 5.12 The Strategic Housing Market Assessment 2022 (SHMA) includes an assessment of the need for specialist accommodation for older people and the potential requirements for housing to be built to M4(2) and M4(3) housing and technical standards.

- 5.13 The SHMA concludes that, in general, South Staffordshire District has an older age structure (in terms of older people) compared with the wider region and nationally. It is recognised that the older person population is likely to increase over the plan period, however an ageing population affects the whole country and is not an issue specific to South Staffordshire. The Government has consulted on raising accessibility standards for new homes but the requirement for all homes to meet M4(2) standards is yet to be mandated. If the Council intends to pursue a policy in respect of M4(2) standards this must be evidenced.
- 5.14 The SHMA published in 2021 identified a need for 1,793 accessible and adaptable general homes for those over 65 and 1,235 for those under 65 to 2038. The latest SHMA (2022) increases this identified need to 2,172 accessible and adoptable general homes for those over 65 and 851 for those under 65 to 2040. It is not clear why these figures have altered so significantly in such a short space of time. However, the need equates to less than 30% of the planned housing supply to 2039. Bloor Homes considers that whilst there may be justification for implementing optional M4(2) standards, the 100% requirement is not justified. The Policy should be amended to require a maximum of 30% of all new homes to be delivered to meet the optional M4(2) standards, especially where this could be in addition to other homes for older people and others with special housing requirements required by Policy HC4.

#### HC8: Self & Custom Build Housing

- 5.15 National Planning Policy Guidance notes a responsibility for 'relevant authorities' to maintain a self-build and custom housebuilding register. In understanding the need for self and custom build the PPG recognises the role of the Strategic Housing Market Assessment in understanding the size, type and tenure of housing needed for different groups including people wishing to self-build or custom build their own homes.
- 5.16 The 2022 SHMA identifies 30 applicants on the self-build register as of Spring 2022, recognising that 10 of these applicants are also on a register within another LPA. This demonstrates a very low level of demand.
- 5.17 Bloor Homes considers Policy HC8 provides a justified and proportionate approach to meeting this specific need, which requires the consideration of the Council's Self Build Register on major developments but falls short of requiring a specific percentage of provision.

## 6. Design & Space Standards

### HC10: Design Requirements

- 6.1 Bloor Homes supports the introduction of a new set of requirements to ensure high quality design and the creation of beautiful places in line with Government guidance.
- 6.2 It should be noted that the proposal at Land East of Bilbrook has already been subject to significant discussion with stakeholders and further consultation will be undertaken in line with the provisions of Policy MA1 in the preparation of a strategic masterplan.

### HC12: Space About Dwellings & Internal Space

- 6.3 Bloor Homes has limited comment in respect of the external space standards that reflect existing policy which are generally considered appropriate.
- 6.4 However, if bungalows are to be provided within a scheme, it would seem logical to relax garden sizes or allow for the provision of communal/shared gardens to ensure efficient use of land and to reflect any desire from the market for low-maintenance external amenity areas. This approach is also likely to align to any appropriate space about dwellings requirements which should reduce the necessary distance between principal facing windows for ground floor windows, where intervening boundary treatments would interrupt views.
- 6.5 Bloor Homes do however object to the internal floorspace policy requirement for all homes to meet Nationally Described Space Standards (NDSS).
- 6.6 The NDSS were published by the Department of Communities and Local Government on 27<sup>th</sup> March 2015. Its publication was accompanied by a Planning Update issued as a Written Ministerial Statement to Parliament by the Rt. Hon. Sir Eric Pickles MP on 25<sup>th</sup> March 2015.
- 6.7 In introducing the standards, the Written Ministerial Statement outlines:

*"New homes need to be high quality, accessible and sustainable. To achieve this, the government has created a new approach for the setting of technical standards for new housing. This rationalises the many differing existing standards into a simpler, streamlined system which will reduce burdens and help bring forward much needed new homes."*



6.8 However, the Written Ministerial Statement is also clear that the standards are optional, and that compliance cannot be required outside of a relevant current Local Plan policy:

*“From 1 October 2015: Existing Local Plan, neighbourhood plan, and supplementary planning document policies relating to water efficiency, access and internal space should be interpreted by reference to the nearest equivalent new national technical standard. Decision takers should only require compliance with the new national technical standards where there is a relevant current Local Plan policy.”*

6.9 This is to ensure that the need for the application of the standards through planning policy is fully evidenced and that the impact on viability is considered alongside all of the other policies contained in the Plan:

*“The optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the National Planning Policy Framework and Planning Guidance.”*

6.10 The reference to the National Planning Policy Framework relates to paragraph 130 which states planning policies should:

*“create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users.”*

6.11 Footnote 49 makes it clear that use of the Government’s optional technical standards should be used where this would address an identified need for such properties and the need for an internal space standard can be justified.

6.12 National Planning Guidance states:

*“Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:*

*need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.*

*Viability – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.*

*Timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions.”*

- 6.13 The Guidance is therefore clear that the application of the NDSS requires a Local Plan policy which has been fully evidenced, including identification of need and the consideration of any impact on viability.
- 6.14 The SHMA 2021 and 2022 Update provide limited commentary in respect of NDSS. The focus of this commentary, contained within the Accessible and Adaptable Housing section on page 84 of the 2022 Update relates to M4(2) and M4(3) standards and provides no justification for the requirement of NDSS on all new dwellings. It appears to imply that the NDSS is a national standard that should automatically apply. As set out above, this is incorrect. It also highlights that any requirements should be assessed to determine whether they are viable and should not impose any further requirements beyond building regs.
- 6.15 It is clear that the evidence does not currently support the imposition of the optional NDSS within South Staffordshire. To the contrary, the evidence highlights a number of potential risks if such a policy were to be introduced. The Council must provide adequate evidence of need if it is to require the application of NDSS in the Local Plan 2018-39 in addition to the separate M4(2) requirements.

### HC13: Parking Standards

- 6.16 Bloor Homes supports the proposed parking standards contained within the Publication Plan.
- 6.17 In respect of EVCPs, The Department of Transport Consultation Response: Electric Vehicle Charging Points (EVCP) in Residential & Non-Residential Buildings dated November 2021 sets out that from 15<sup>th</sup> June 2022 new dwellings (with associated parking within the boundary of the dwelling) will have at least 1 EVCP per dwelling. Therefore, it is no longer necessary for the Council to have a proposed policy requirement for EVCPs.

- 6.18 It is noted that the Council's Viability Assessment includes a cost of only £500 per EVCP. This cost is below the Government's cost estimate and excludes any costs for upgrading local networks. The Department for Transport - Electric Vehicle Charging in Residential & Non-Residential Buildings consultation estimated a cost of £974 per EVCP plus an automatic levy for upgrading networks capped at £3,600. This is not reflected in the Stage 2 Viability Study.

## 7. Promoting Successful & Sustainable Communities

### HC14: Health Infrastructure

- 7.1 Bloor Homes recognises the need for development to address unacceptable impact on health infrastructure. At present the policy is restricted to seeking a proportionate financial contribution where it is demonstrated that existing facilities do not have capacity to accommodate patients.
- 7.2 Bloor Homes considers this policy should provide additional flexibility by recognising on-site provision of health infrastructure may represent a more appropriate solution to meeting health needs.

### HC15: Education

- 7.3 Bloor Homes supports Policy HC15 in respect of education infrastructure which appears to represent a continuation of the current approach.
- 7.4 It should be noted the Land East of Bilbrook is proposing to allow for the provision of a new first school to serve the proposed strategic allocation. This is a requirement set out in Policy SA1. The proposed location for the proposed First School is collocated with the proposed community hub and provision for the elderly.
- 7.5 It is recommended that engagement with SCC Education informs further refinement of the Infrastructure Delivery Plan as part of the Local Plan review process. A definitive trigger for requiring the transfer of the land and for the opening of any associated school is also necessary to inform any site phasing plan.

### HC17: Open Space

- 7.6 Bloor Homes notes the proposed direction of travel in respect of open space which proposes a reduced open space requirement of 0.006ha per dwelling compared with the existing standard of 0.01ha set out within the adopted Site Allocations Document (SAD).
- 7.7 Concern is raised that the emerging requirements appear to provide no flexibility with regards to a site's context. For example, the assumption that all on-site open space should include equipped play provision as a default is unreasonable where good quality, accessible equipped play is already located within the immediate vicinity of a site.

- 7.8 Bloor Homes wishes to raise concerns that distance/accessibility isochrones are not identified within the policy for different open space typologies such as LEAPs and LAPs to ensure open space infrastructure and are presumably left to a future Open Space, Sport and Recreation SPD. Accessibility standards should be established through the Local Plan to provide certainty and not displaced to supplementary guidance which is not intended to establish policy.
- 7.9 The illustrative masterplan for Land East of Bilbrook, introduced at **Appendix 2**, demonstrates the delivery of public open space in excess of the 0.006ha requirement and the provision of a range of formal and informal play provision as part of a network of multi-functional green spaces.

#### HC18: Sports Facilities & Playing Pitches

- 7.10 Bloor Homes notes the Indoor Sports Facilities Strategy and Playing Pitch Assessment/Strategy that forms part of the evidence base for the emerging Local Plan.
- 7.11 Bloor Homes recognises that a financial contribution to sports facilities and playing pitches may be necessary from new major development to meet needs arising from the development where evidence recognises there is a shortfall in capacity to meet the generated demand.
- 7.12 The policy allows for a financial contribution to improve existing facilities in lieu of new on-site provision where appropriate. This reflects Policy SA1 which seeks enhancement of and provision of additional playing pitches within an existing recreational open space to the north of Pendeford Mill Lane as part of the East of Bilbrook development.

#### HC19: Green Infrastructure

- 7.13 Bloor Homes supports the policy approach to protecting, maintaining and enhancing where possible a network of interconnected, multi-functional and accessible green and blue spaces
- 7.14 Bloor Homes supports the provision of multi-functional greenspace as part of strategic developments.
- 7.15 Again, the illustrative masterplan included at **Appendix 2** demonstrates the delivery of multi-functional, interconnected, accessible green and blue spaces as part of the comprehensive proposal for East of Bilbrook.

## 8. Building a Strong Local Economy

### EC3: Inclusive Growth

- 8.1 The requirement for an Employment and Skills Plan to be prepared for all developments of 100 or more residential units is not supported by Bloor Homes.
- 8.2 Bloor Homes is committed to doing its part to help to resolve the well-documented national housing crisis, and in doing so recognises that addressing the construction skills shortage is of critical importance. Bloor Homes as a company has committed to the Home Building Skills Pledge, and in doing so have or are putting in place the following initiatives on a business wide basis:
- Relaunch and expansion of their unique apprenticeship scheme in 2014. They directly employ over 1002 apprentices at any one time on a 3-year programme, which represents around 15% of their workforce. The Bloor scheme is unique in that they directly employ at least two apprentice masters in each region (bricklaying and carpentry). The apprentice masters all have site and teaching experience, and are paid and incentivised solely to bring apprentices through the programme (i.e. they are not also expected to carry out work as a tradesmen alongside their mentoring roles).
  - Ongoing trainee programme. Alongside the apprenticeship scheme, the trainee programme seeks to take in at least four trainees per region each year in the technical (architecture and engineering), surveying, sales and site management departments.
- 8.3 Whilst Bloor Homes recognises the importance of providing employment and skills initiatives that will impact on directly on the local areas in which they develop, the limitations arising as a result of the business model employed by Bloor Homes and all of the other major housebuilders should also be taken into account:
- All major housebuilders typically operate each site with a handful of directly employed staff (Site Manager, Assistant Site Manager, Labourer, Forklift Truck Driver etc) with all trades being sourced through subcontract businesses.
  - Direct employees as a rule move from development to development as one site nears completion and the construction of others starts, rather than being recruited from the area local to the development.

- Management and back-office support teams are based in regional hubs – for example, the Midlands region has an office in Tamworth which at present covers an operating area stretching from Leicester to Shrewsbury on an east-west axis and from Nottingham to Stratford upon Avon on a north-south axis

8.4 As a result, it is unrealistic to expect students near a given development site looking for management and back-office work experience to travel to the regional office, which could be up to 50 miles away. In addition, due to the sub-contracting of the majority of the trades on any given site, such an ESP may not be able to provide any measurable evidence on local job creation or provide certainty in respect of inclusive growth.

## 9. Community Services, Facilities & Infrastructure

### EC8: Retail

- 9.1 Bloor Homes notes the reference to a small quantity of retail provision being supported within Policy EC8 at Land East of Bilbrook to support the existing Retail Centres Hierarchy.
- 9.2 It is intended that retail floorspace will be included within a central village hub as part of a mix of commercial and community facilities.
- 9.3 The Policy is not clear whether the net floorspace thresholds identified within Policy EC8 for the provision of impact assessments will apply to the Strategic Development Locations.

### EC11: Infrastructure

- 9.4 Bloor Homes supports the Council's proposed infrastructure led strategy which seeks to focus development towards larger and better-connected settlements and where appropriate deliver new infrastructure benefits alongside new development.
- 9.5 Land East of Bilbrook is a larger strategic proposal that can facilitate significant infrastructure provision. The site can deliver the following emerging infrastructure opportunities identified within the Infrastructure Delivery Plan 2022 (IDP):
- **Education:** 1.5 FE First School with land to expand to 2FE
  - **Green Infrastructure:** network of green and blue infrastructure running through the site including central green space (including equipped play play) and off-site open space delivered to the south of the site to meet the requirements for Green Belt compensatory measures.
  - **Retail/local centre:** Small local convenience retail to serve the day to day needs of the neighbourhood
  - **Highways:** Mitigation requirements informed by TA for the site, but likely to include junction improvements/signalisation at Pendeford Mill Lane/Barnhurst Lane and Wobaston Road/Lawn Lane.
  - **Sustainable transport/active travel:** Potential new bus service in Bilbrook to serve proposed development and walking and cycling infrastructure



improvements associated the site including consideration of routes to Bilbrook Middle School and canal towpath improvements on NCN route 81.

- **Health:** financial contributions towards improvements to primary care, subject to ICB request
- **Playing pitches:** financial contributions towards improvements (including increased capacity) to nearby existing playing pitches.

9.6 Bloor Homes is committed to engaging with the District Council, and other stakeholders to explore infrastructure requirements to inform future iterations of the Infrastructure Delivery Plan and the emerging proposal for Land East of Bilbrook. Engagement with key infrastructure providers through the Local Plan review process has taken place through the masterplanning process which has informed the Infrastructure Delivery Plan (IDP) however further engagement is necessary to provide absolute clarity in respect of infrastructure requirements, costs and phasing of delivery. This will inform the strategic masterplan and any associated design code.

9.7 In line with para 122 of The Community Infrastructure Levy Regulations 2010, any financial contributions sought in respect of infrastructure must be:

- (a) necessary to make the development acceptable in planning terms;
- (b) directly related to the development; and
- (c) fairly and reasonably related in scale and kind to the development.

## 10. Protecting & Enhancing the Natural Environment

### NB2: Biodiversity

- 10.1 The intention of Policy NB2 is recognised, however, the Government policy and guidance does not yet require 10% biodiversity net gain. Any policy should require a net gain in line with latest Government legislation, policy or guidance.

### NB3: Cannock Chase SAC

- 10.2 Bloor Homes notes further evidence in respect of Cannock Chase SAC, including a review of mitigation measures and visitor survey. This evidence has informed the current mitigation measures as Policy NB3 to address any impact arising from development within a 15km radius of Cannock Chase SAC.

## 11. Climate Change & Sustainable Development

### NB6: Sustainable Construction

- 11.1 Changes to building regulations (Part L) to deliver the Government's 'Future Homes Standard' means that from mid-2022, new homes will have a 31% reduction in CO<sup>2</sup> when compared to previous standards. Further changes are due in 2025 that will mean a 75% reduction in CO<sup>2</sup> when compared to today, along with a new focus on rating primary energy efficiency as well as CO<sup>2</sup>.
- 11.2 The Council's proposed policy approach appears to seek carbon reduction measures over and above those being introduced by the Government. The Sustainable Construction & Renewable Energy Topic Paper refers to clear evidence and recommendations contained within the Staffordshire Climate Change Study 2020 providing a clear and compelling case for the Local Plan Review to set carbon reduction standards for new buildings that go beyond building regulations and the current trajectory for implementing the Government's Future Homes Standard. Bloor Homes does not accept this view.
- 11.3 The Climate Change Study was published prior to introduction of the latest changes to Part L of the Building Regulations and the Study recognised that its recommendations would be affected by the Government's consultations on the Future Homes Standards. The Study also recognised that any standards established would need to be subject to viability assessment.
- 11.4 The 63% reduction in carbon emissions against Building Regulations Part L sought by Policy NB6 does not appear to be justified by any evidence produced by the Council to support the emerging Local Plan.
- 11.5 In addition, the Stage 2 Viability Assessment assumes sustainable design/construction standards equivalent to Building Regulations which represent a 31% CO<sup>2</sup> reduction, not a more onerous CO<sup>2</sup> reduction target. The 63% proposed reduction is therefore not justified by the evidence and should be removed.
- 11.6 A locally specific CO<sup>2</sup> reduction requirement is unnecessary and without justification for deviation from Government requirement is repetitious of current Building Regulations. It is the Government's intention to set standards for energy efficiency through the Building Regulations. The key to success nationally is standardisation and avoidance of individual Council's specifying their own policy approach to energy efficiency, which undermines economies of scale for product manufacturers, suppliers and developers. The Council does not need to set local energy efficiency standards to achieve the shared net zero goal

because of the higher levels of energy efficiency standards for new homes set out in current Building Regulations and proposals for the 2025 Future Homes Standard.

## 12. Land East of Bilbrook

- 12.1 This Chapter sets out a brief description of Land East of Bilbrook, followed by an assessment of the site against each of the Council's site selection criteria, as defined within the Housing Site Selection Topic Papers published in 2021 and 2022.
- 12.2 A Development Framework document has been prepared and is attached at **Appendix 2** to this representation which provides further detail.

### Site Description

- 12.3 Bloor Homes has current land interests to the east of Bilbrook as shown on the Site Location Plan appended to this representation (see **Appendix 1**).
- 12.4 The site comprises a number of field parcels and several agricultural buildings, located off Pendeford Mill Lane.
- 12.5 The site encompasses several smaller parcels of land that are identified through the adopted Site Allocations Document as either a housing allocation (ref: 443) or safeguarded land (ref: 443 and 209). The remainder of the site is located within the West Midlands Green Belt.
- 12.6 Housing Allocation ref: 443 is has the benefit of full planning permission (ref: 18/00710/FUL) for 164 dwellings, served by a new access from Pendeford Mill Lane. This development is under construction and is expected to be completed in August 2023. It is noted that this site is excluded from the proposed strategic development allocation.
- 12.7 This proposed strategic development location represents a logical and sustainable urban extension to the Tier 1 settlement of Bilbrook, providing an opportunity for delivering up to 800 additional new homes with associated supporting infrastructure, including the provision of a new first school, a new mixed-use community hub and a new link road between Lane Green Road and Pendeford Mill Lane.
- 12.8 An illustrative masterplan identifies the following key components:
- Provision of up to 800 homes and an Extra Care Scheme of up to 75 units;
  - Provision of a centrally located first school (capable of expansion to 2FE) and mixed-use community hub;

- Provision of approximately 17 hectares of green and blue infrastructure, evenly distributed throughout the site, including provision of amenity greenspaces, green corridors, SuDS and natural play area;
- A centrepiece equipped play area within a new Community Square;
- Incorporation of existing watercourse;
- Creation of a new through route between Lane Green Road and Pendeford Mill Lane; and
- Provision of pedestrian and cycle paths to link with existing infrastructure.

12.9 A Development Framework document has been prepared by e\*SCAPE Urbanists which provides further detail in respect of the site and progression of the proposal in line with Policy MA1 and is included at **Appendix 2** to this representation.

#### Sustainability Appraisal (SA) Findings

12.10 The Council's Sustainability Appraisal (2022) provides an assessment of sites both pre and post mitigation and provides assessment of reasonable alternatives against the SA Objectives.

12.11 It is noted that the site assessment for Land East of Bilbrook (Site 519) scores the site a single negative against SA Objective 11 (Education) due to the site being located outside of the target distance for education for all primary ages. This appears irrelevant on the basis the site can provide a new First School to address current capacity issues as required by Policy SA1. It should be noted that Policy SA1, which relates to Land East of Bilbrook, achieves a score of double positive in respect of this Objective.

12.12 The site also scores a negative against SA Objective 12 (Economy & Employment) which suggests the site is in a location that has an unreasonable or poor access to employment opportunities. This score is disputed on the basis the site lies adjacent to active travel links to the nearby i54 strategic employment site as recognised within the Housing Site Selection Paper. This identifies a 'linear, well-lit cycle path also runs east from the northern edge of the site along the Wodboston Road to the strategic employment site at i54, which is less than a mile from the site.' This is correctly assessed in the Sustainability Appraisal in respect of Policy SA1.

- 12.13 Nevertheless, the site is located adjacent to the current built up area of Bilbrook with good access to the village centre, including being within walking distance of its many facilities and bus/train links.
- 12.14 The site also benefits from good access to further services and facilities located within the wider urban area, including Wolverhampton.
- 12.15 The site is therefore sustainably located.

### Sequential Test

- 12.16 The Council's spatial development strategy identifies an infrastructure led approach to growth. Bloor Homes agrees that additional growth is required in the Tier 1 settlements of Codsall/Bilbrook, beyond the existing levels of safeguarded land and urban capacity to deliver this infrastructure-led approach. This will require the release of further Green Belt land.

### Green Belt Harm

- 12.17 It should be noted that Land to the East of Bilbrook incorporates 12.5ha of land that was safeguarded to meet longer term housing needs within the Site Allocations Document. However, an element of the site lies within the West Midlands Green Belt, adjacent to the current built up area of Bilbrook and within walking distance of its many facilities and bus links.
- 12.18 Whilst the Council's Green Belt Assessment (2019) indicates that development of the site would result in a 'high' level of harm to the purposes of the Green Belt, the conclusion for Green Belt Sub-Parcel ref: S46Cs2 confirms the weakening of the Green Belt in respect of releasing this site for development would be limited:

*"The sub-parcel makes a strong contribution to preventing sprawl of the West Midlands conurbation and preventing encroachment on the countryside. Although this land contributes to the Green Belt gap between surrounding settlements, those parts of the sub-parcel that do not extend into the more vegetated River Penk corridor are more closely associated with adjoining existing development, and therefore their release would constitute a limited weakening of the Green Belt."*

- 12.19 The conclusion that the release of this site would constitute a limited weakening of the Green Belt is supported by Bloor Homes.
- 12.20 The Housing Site Selection Paper identifies that the 'vast majority of the site's Green Belt area is identified as having high harm.' It should be recognised that all land within the proposed strategic housing allocation is identified as 'high

harm' with the 'very high harm' relating to solely to proposed green infrastructure beyond the southern boundary of the proposed allocation. This is recognised within the Site Proforma which concludes an allocation of up to approximately 38ha could be delivered without encroaching on areas of very high harm.

### Landscape Sensitivity

- 12.21 South Staffordshire District Council's Landscape Study (2019) finds that the site has 'moderate' sensitivity in landscape terms.
- 12.22 Whilst the findings of the Landscape Study are not necessarily disputed by Bloor Homes, the site has previously been assessed through the Site Allocations Document process as having a 'low impact' on landscape sensitivity. It is, therefore, not understood how the landscape sensitivity of the site has increased, particularly now land at Pendeford Mill Lane (Site Allocation Ref: 443) has a consent for the delivery of 164 homes.
- 12.23 Nevertheless, it is considered that the development of the site for residential purposes represents an opportunity to strengthen existing field boundaries within and to the edges of the site. Furthermore, the development of the site facilitates the opportunity to provide a strong landscape strategy, which would serve to define the western edge of Bilbrook.
- 12.24 The landscape strategy proposes the following key features:
- Retention, as far as possible, of the existing elements that make up the site's green infrastructure, such as trees and hedges and integrating these into the development, giving the scheme an immediate sense of maturity;
  - Provision of a network of inter-connected green spaces that help to provide visual relief to the built form;
  - A clear hierarchy of public open spaces including a Central Green, a linear park along Barnhurst Lane and a large multifunctional area of public open space at the south-west corner of the site providing a buffer to the adjacent railway line;
  - Ensuring the gaps in the existing hedge adjacent to Pendeford Mill Lane and Barnhurst Lane are in-filled with native trees and hedge planting. Evergreen species of holly should be included in the mix to provide effective screening through the winter months; and



- Ornamental and native hedge planting to be planted in and around the proposed development to soften any adverse effects of the built form.
- 12.25 A range of trees are proposed to be introduced to reflect the street hierarchy including the central avenues, squares and mews. Opportunities exist for native trees planting within the Central Green and linear parks to the north-east and general perimeters including areas of public open space.
- 12.26 The long-term residual effects of the development are not considered likely to exceed minor moderate in terms of significance to the overall landscape and visual amenity. Potential adverse effects that have been identified to be present at the operational stage, especially on the site and its setting will be reduced and offset by the mitigation provided in the potential planting scheme described within the landscape strategy.
- 12.27 It is contended that the site is able to accommodate the proposed residential led development without causing undue harm to the landscape character and visual amenity of the site and surrounding countryside and footpath network.

### Impact on the Historic Environment

- 12.28 Bloor Homes has commissioned Orion to prepare a heritage report, which draws together the available archaeological, historic, topographic and land-use information in order to clarify the heritage significance and archaeological potential of land proposed for development.
- 12.29 The assessment establishes that there are no designated heritage assets (World Heritage Sites, Scheduled Monuments, Listed Buildings, Registered Battlefields, Registered Historic Parks or Conservation Areas) within the study site, and that development of the study site will not affect the significance of any designated heritage assets, nor their settings, in the surrounding area.
- 12.30 In summary, the technical work undertaken to date concludes there are no heritage constraints to the allocation of the site for residential development.

### Surface Water Flooding

- 12.31 The site lies within Flood Zone 1 which has the lowest probability of flooding.
- 12.32 A Sustainable Drainage Strategy (SuDS) is proposed:
- To efficiently drain the site whilst not causing flooding down stream;
  - To create suitable habitats to promote biodiversity;

- To create ecological corridors across the site;
- To create an aesthetically pleasing setting for development; and
- To promote the site as a sustainable place to live and work.

### Highways (Accessibility to the Site)

- 12.33 The consented Bloor Homes proposal is served by a new priority junction with Pendeford Mill Lane, providing access to the scheme via a Spine Road. The wider land to the east of Bilbrook site proposes a new primary roundabout access located to the east of the approved access on Pendeford Mill Lane.
- 12.34 Potential exists to provide additional access points into the site from the west off Lane Green Road and from the east off Barnhurst Lane.
- 12.35 The proposal would create a new through route between Lane Green Road and Pendeford Mill Lane, which may assist in relieving congestion within the existing village. In addition, new routes are proposed to connect the proposed new homes with the existing network of streets to promote sustainable modes of travel to support existing services within Bilbrook.
- 12.36 A Strategic Transport Assessment has been prepared in respect of the site.

### Impact on Current Land Use

- 12.37 The site currently comprises several parcels of land utilised for agricultural use and used mainly for grazing. There are no Public Rights of Way across the site and contains no publicly accessible open spaces or community uses that would be lost as a result on development.
- 12.38 To the contrary, the proposal would deliver new public open space and community facilities that would benefit Bilbrook, including a new first school and equipped play areas.

### Impact on Natural Environment

- 12.39 There are no statutory designated sites of nature conservation value within or immediately adjacent to the site. The nearest SSSI is Big Hyde Rough SSSI which is located approximately 5.2km north of the site. This SSSI is designated as ancient woodland habitat containing a large floristic diversity. This SSSI is well separated from the site by major and minor roads and open countryside, and as such it is not considered there will be any adverse direct or indirect effects on

this statutory designated site as result of the proposals. The site lies outside the Impact Risk Zone for the Big Hyde Rough SSSI.

- 12.40 The nearest Local Nature Reserve (LNR) is Smestow Valley LNR which is located over 1.5km southeast of the site. This LNR is designated for its pockets of woodland and meadow and its importance to birdlife and is separated from the site by open countryside, minor and major roads and existing residential development, and as such, it is not considered there will be any direct or indirect adverse effects on this statutory designated site.
- 12.41 There are no non-statutory designated sites within or immediately adjacent to the site.
- 12.42 There are a number of hedgerows present within the site which define boundaries including along Pendeford Mill Lane, Barnhurst Lane, Lane Green Road and the boundary with the railway line. Internal field boundaries are also defined by hedgerows.
- 12.43 Existing trees within the site are largely confined to internal hedgerows although there is a scattering of individual trees towards the northern extent of the site.
- 12.44 The agricultural land contained within this site is believed to be a mixture of Grade 3 (split of 3a and 3b is unknown at this time), and Grade 2 (which is land of best and most versatile value).
- 12.45 However, the same is true for the majority of land around Bilbrook and therefore should not reflect negatively against this site.

#### Impact on Environmental Quality

- 12.46 The agricultural site is unlikely to have significant issues in relation to contamination, and the surrounding context of the site is not considered to represent constraints in relation to air quality and noise.
- 12.47 Whilst it is accepted that development is unlikely to improve the environmental quality of the site, as there are no existing issues of contaminated land, development would not give rise to any further environmental quality issues.

#### Site-Specific Opportunities

- 12.48 As set out previously within this representation, the development of the site for residential purposes presents the opportunity to deliver a new First School, which is identified within the Council's Infrastructure Delivery Plan as a requirement.

- 12.49 In addition, the proposal would deliver a new through route between Lane Green Road and Pendeford Mill Lane aligned to the aspiration of the local community.
- 12.50 Further detail in respect of the large multifunctional area of public open space at the south-west corner of the site, to remain within the Green Belt, is provided within the accompanying Vision Document, included at **Appendix 2** to this Representation.
- 12.51 This represents a significant benefit of allocating Land East of Bilbrook, for residential development.

### Suitability

- 12.52 The information set out above, read in conjunction with the appended Development Framework document, demonstrates that Land East of Bilbrook is a suitable site.

### Deliverability

- 12.53 There are agreements in place between the landowners and Bloor Homes to facilitate the development of the site.
- 12.54 Bloor Homes intends to undertake further technical work to demonstrate the deliverability of land east of Bilbrook, however information gathered to date concludes that there are no physical or other constraints likely to render the site undeliverable within the proposed Plan period to 2039. The site is available now.
- 12.55 The site is deliverable and immediately available and, subject to allocation and removal of an element of the site from the Green Belt, could start to deliver homes and associated community benefits within the next 5 years. Bloor Homes already has nearly completed construction of 164 homes accessed off Pendeford Mill Lane which would represent the first phase of the wider Land East of Bilbrook proposal.

## 13. Conclusion

- 13.1 This representation is made by Evolve Planning on behalf of Bloor Homes to the South Staffordshire Local Plan Review, Publication Plan (Regulation 19) consultation. This representation relates to land at East of Bilbrook, a proposed strategic development location, which Bloor Homes is promoting for residential-led development.
- 13.2 Bloor Homes supports the Council's proposed spatial development strategy, which includes the proposed strategic allocations Bilbrook. Focusing growth to Tier 1 and Tier 2 settlements provides a sound approach to distributing housing growth.
- 13.3 Bloor Homes supports the proposed Local Plan, however specific comments are provided in respect of the housing requirement, a number of development management policies and the Council's consideration of the evidence base in relation to Land East of Bilbrook.
- 13.4 The information contained within this representation, read in conjunction with the appended Development Framework document and the Council's published evidence base demonstrates that Land East of Bilbrook is a suitable and deliverable site for residential development, subject to its release from the Green Belt.
- 13.5 It is therefore submitted that Land East of Bilbrook represents a sound strategic housing allocation.

# APPENDIX 1

## Site Location Plan

Key

Site Boundary



0m 20m 40m 60m 80m 100m  
Scale 1:2,500 (@A2)  
n\*ORTH  
Ordnance Survey © Crown copyright 2022.  
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Project Title  
Land at Pendeford Mill Lane, Bilbrook

e\*SCAPE Job No.  
022-013

Client  
Bloor Homes Midlands

Drawing Number  
022-013-004

Revision  
REV -

Drawing Title  
Site Boundary Plan

Scale  
1:2,500 @ A2

Date  
December '22

# APPENDIX 2

## Development Framework



# LAND EAST OF BILBROOK

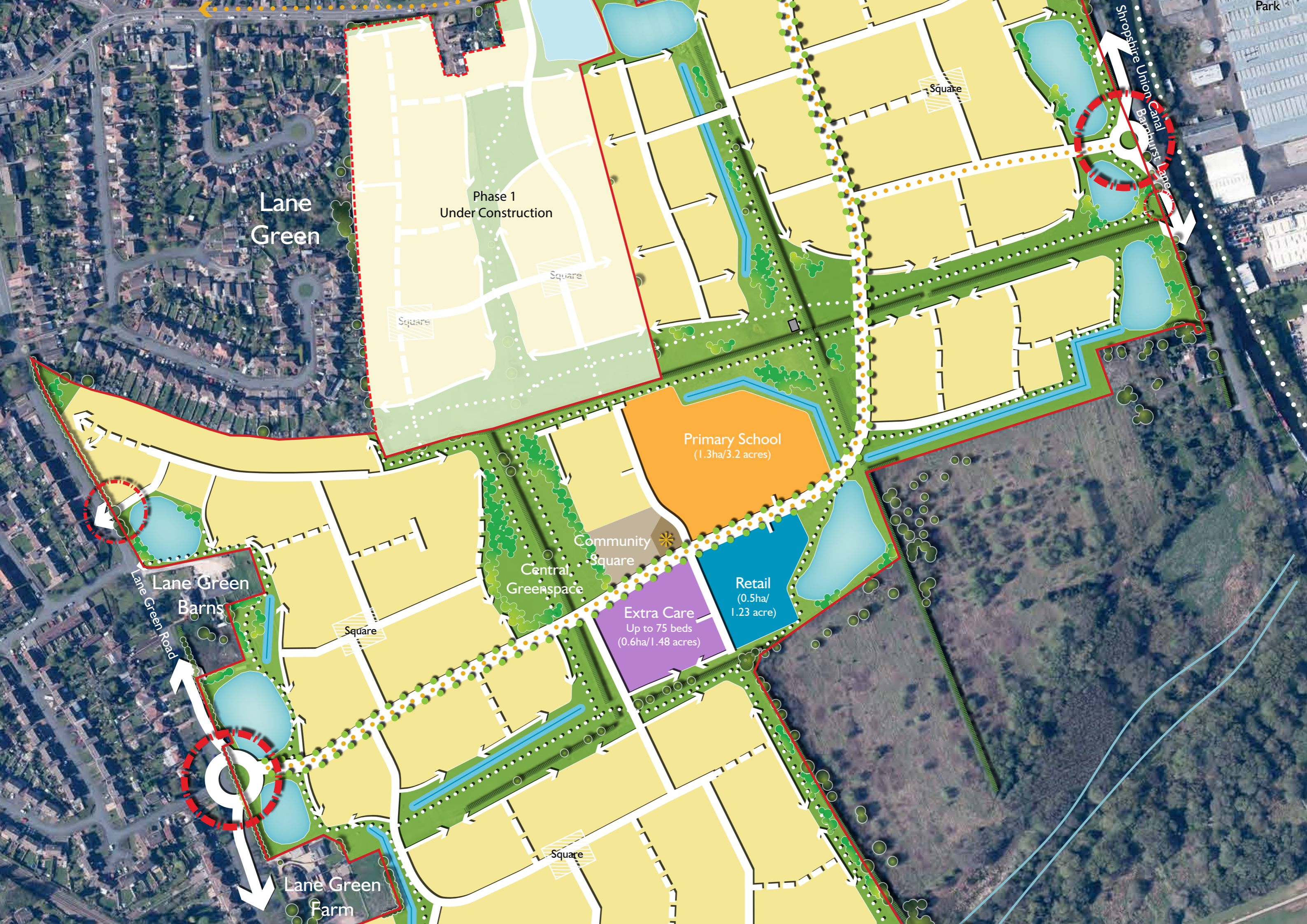
## *Development Framework*

**December 2022**

<b>Quality Checked*</b>	The Studio, Hartsgrove Farm Hollin Lane Sutton Macclesfield Cheshire SK11 0NN Tel: 01260 253207 Email: hello@escape-urbanists.com www.escape-urbanists.com
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- 3.0** Planning Policy Context
- 4.0** Vision & Development Objectives
- 5.0** Constraints & Opportunities
- 6.0** The Masterplan
- 7.0** Urban Design Framework
- 8.0** Phasing & Delivery
- 9.0** Summary & Conclusions



Lane Green

Phase 1 Under Construction

Primary School  
(1.3ha/3.2 acres)

Community Square

Central Greenspace

Retail  
(0.5ha/1.23 acre)

Extra Care  
Up to 75 beds  
(0.6ha/1.48 acres)

Lane Green Barns

Lane Green Farm

Lane Green Road

Shropshire Union Canal  
Barnhurst Lane

Park

Square

Square

Square

Square

Square

# 1. INTRODUCTION

## INTRODUCTION

This document has been prepared for Bloor Homes by a multi-disciplinary, professional consultancy team. It provides a development framework for the delivery of a residential led scheme for land east of Bilbrook ('the site'), South Staffordshire.

Utilising the vision, objectives and concept masterplan produced through collaboration to date, this document outlines the progression of the proposal having regard to the identified constraints and opportunities that have been informed by the baseline evidence prepared to date.

## BACKGROUND

Land east of Bilbrook is one of four key Strategic Development Locations which has been identified to support housing growth within South Staffordshire up to 2039.

The Publication Local Plan recognises that it is important to properly masterplan sites of this scale, which need to be supported by appropriate new infrastructure.

Since land east of Bilbrook was identified as a Strategic Development Location in the Preferred Options document, Bloor Homes has worked collaboratively with the Council, the Council's masterplanning consultant and a range of key stakeholders to progress a Vision, Objectives and illustrative masterplan. The work undertaken to date provides the foundations for the emerging proposal contained within this development framework.

In line with draft Policy MA1, Bloor Homes is committed to progressing the proposal by preparing a comprehensive masterplan and accompanying design code through further stakeholder and local community engagement to inform the preparation of a planning application in due course.

## SCOPE

The development framework presented, is underpinned by the following key elements:

- **Land Use Framework:** Identifying the quantum and distribution of the type and mix of development proposed across the site.
- **Movement Framework and Access Strategy:** providing details of vehicular and pedestrian/cycle access points and a hierarchy of movement routes within the site and to key destinations beyond the site.
- **Green Infrastructure Framework:** demonstrating the delivery of a network of multifunctional green space including sustainable drainage, public open spaces and habitat creation.
- **Strategic Urban Design Framework:** identifying the strategic design approach to ensuring the delivery of a high-quality development.

The development framework will inform the preparation of a side-wide Strategic Master Plan (SMP) through further engagement.

This document demonstrates there are no physical, environmental, ecological or other constraints preventing the site coming forward for housing and concludes the site can achieve sustainable development that is well-designed and responsive to the local context.



# 1. INTRODUCTION

## BLOOR HOMES

Bloor Homes Ltd was founded in 1962 and now has 60 years of continuous experience in promoting and delivering major housing schemes across the UK. Through a combination of Bloor Homes, Triumph Motorcycles and Pickerings Plant, Bloor Holdings Ltd has a combined turnover in excess of £2bn per annum and remains a financially independent, family owned business with no debt.

The business operates across the country from 9 regional offices, with a headquarters based in Leicestershire. The company now builds in excess of 4500 new homes annually and has consistently maintained its HBF rating as a 5 Star Home Builder.

The business model operated by Bloor Homes is focussed on the identification, promotion and delivery of major strategic housing sites, delivering over 70% of its plots annually from its strategic land portfolio. This requires Bloor to act as a responsible housebuilder, ensuring high quality schemes are delivered 'from cradle to grave', often over a number of individually promoted phases.

Bloor Homes have the necessary expertise, funding and capacity to deliver a high quality new neighbourhood to the east of Bilbrook, building on the successful Bilbrook Mill development.

## DOCUMENT STRUCTURE

The remainder of this document is structured as follows:

- Section 3: Provides a brief summary of the national and local planning policy context relevant to the site and development proposals.
- Section 4: Sets out a proposed Vision and development objectives for the site.
- Section 5: Provides an overview of the key development constraints and opportunities affecting the site, drawing on a range of technical surveys and studies.
- Section 6: Presents the proposed masterplan for the site, including a description of key design principles and features;.
- Section 7: Presents the urban design framework underpinning the proposed masterplan.
- Section 8: Provides an initial phasing and delivery strategy for the site.
- Section 9: Summary & Conclusions.



# 2. THE SITE

## THE SITE

The site extends to approximately 40 hectares and is located on the eastern edge of Bilbrook village, approximately 5.5km north west of Wolverhampton (see location plan opposite).

The site comprises a number of field parcels and several agricultural buildings, located off Pendeford Mill Lane, which forms the northern boundary to the site. Barnhurst Lane extends along the eastern boundary, beyond which lies the Shropshire Union Canal and Balliol Business Park. To the west, the site fronts onto Lane Green Road. The River Penk corridor runs to the south-east.

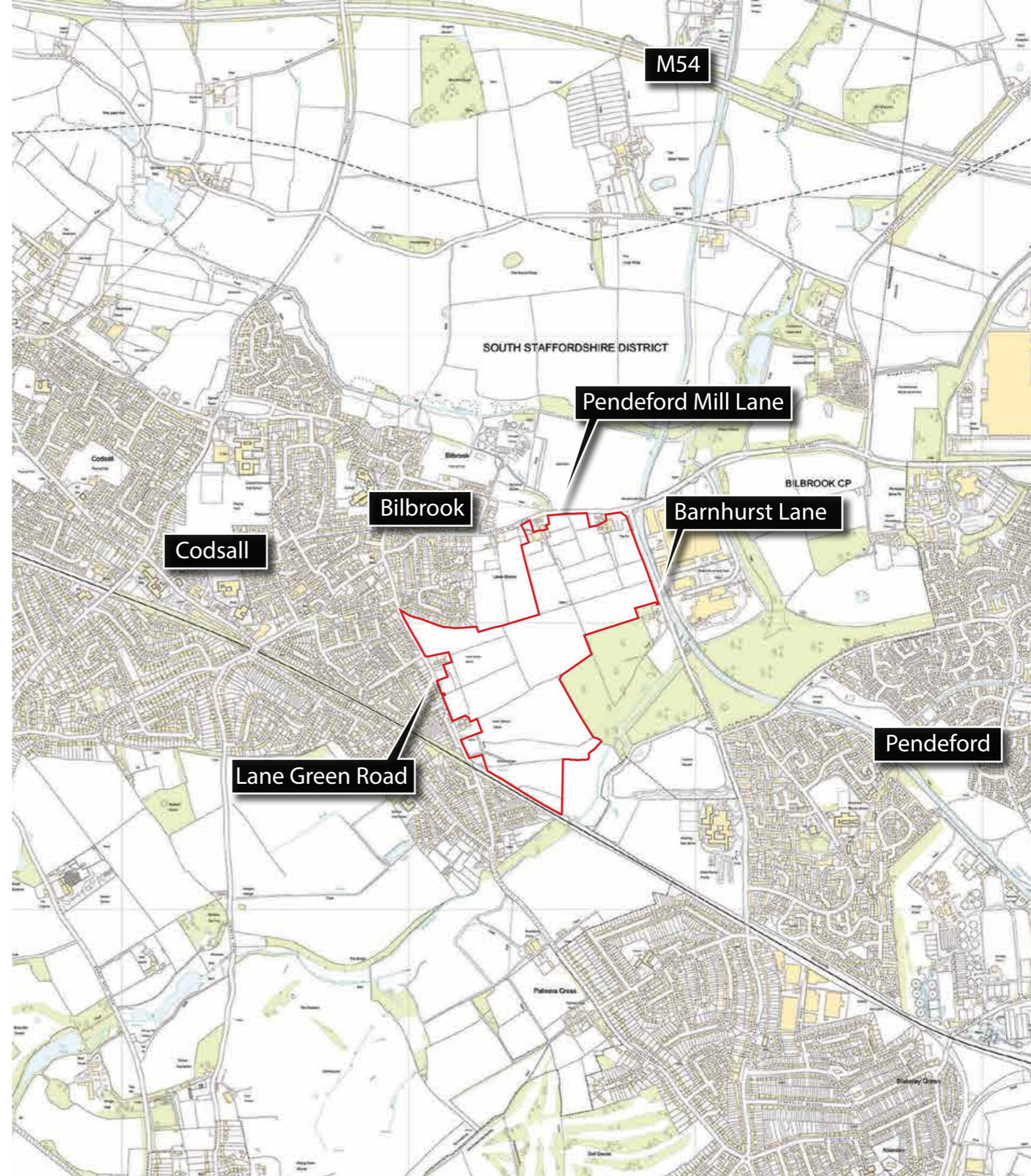
At the north-west corner of the site, a parcel of land is currently being developed by Bloor Homes as Bilbrook Mill to provide 164 dwellings, with a recently-constructed access from Pendeford Mill Lane.

The site is controlled by Bloor Homes who are committed to the delivery of a high-quality, contextually responsive and comprehensive residential-led scheme on the land.



Site Boundaries Plan

# 2. THE SITE



Site Location Plan

# 3. PLANNING POLICY

## NATIONAL PLANNING POLICY

A revised National Planning Policy Framework (NPPF) was introduced in July 2021. The Government recognises that the planning system should be genuinely plan-led, with succinct and up-to-date local plans providing a positive vision for each local authority; a framework for addressing housing needs and other economic, social and environmental priorities that span a minimum 15 year period from adoption.

The NPPF requires local authorities to identify a sufficient amount and variety of land, that can come forward where it is needed, to support the Government’s aim of significantly boosting the supply of homes. To determine the number of homes needed a local housing need assessment is required, conducted using the ‘standard method.’ This standard method identifies a housing need for South Staffordshire District of 241 dwellings per annum, including an uplift to take account of market signals and affordability.

Similarly, the standard method indicates that, collectively, the four Black Country authorities are obliged to deliver 4,004 dwellings per year, including a 35% uplift applied to the City of Wolverhampton.

## SOUTH STAFFORDSHIRE LOCAL PLAN REVIEW

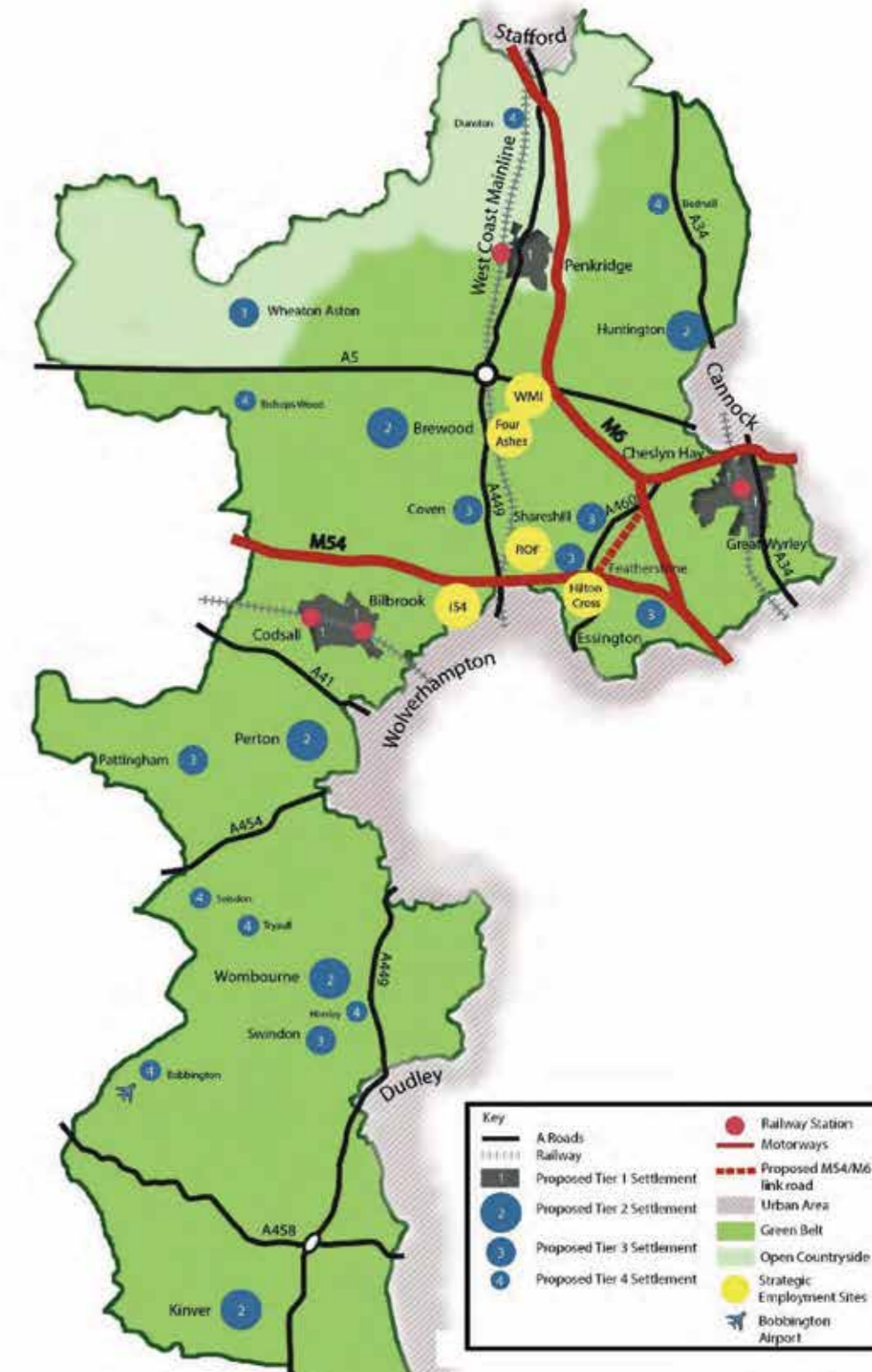
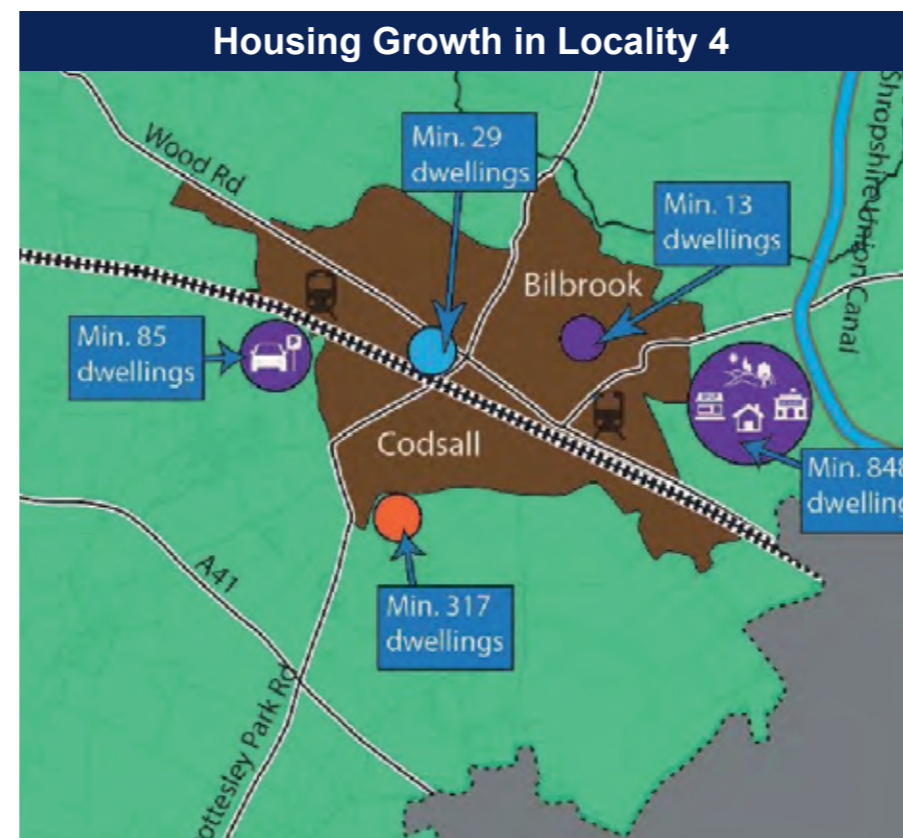
The current development plan commits the District Council to carrying out an early review of the development plan in order to respond to the increasing need for development, both within South Staffordshire and the wider housing market area.

Bloor Homes supports the District Council’s decision to carry out a review to ensure an up to date planning policy framework is in place to shape the District to 2039. The review is necessary to address local housing need, reflect new national planning guidance and provide a meaningful contribution to meeting

needs of neighbouring authorities, where it can be demonstrated that they are unable to do so.

The proposed spatial development strategy focuses growth within Locality 4 to Bilbrook and Codsall, recognising the recommendations in the Greater Birmingham and Black Country Strategic Growth Study and the greater level of existing services and facilities in this area compared to other villages in the district, including access to two railway stations.

The Preferred Options version of the Local Plan Review identified Land East of Bilbrook as a preferred Strategic Development Location (SDL). This SDL is now identified in the Publication Local Plan as a location for major housing growth comprising a minimum of 848 homes, a new first school, a community hub and



South Staffordshire Context Map and Proposed Settlement Hierarchy



# 4. VISION

## VISION

The Publication Local Plan (Policy SA1) sets out a unique Vision for the site which is presented opposite. Policy SA1 also identifies a series of development objectives covering social, economic and environmental themes which are presented on Page 10.

This Vision and associated development objectives have provided the starting point for informing the emerging masterplan and the development framework which underpins it.

Particular consideration has been given to the need to create an attractive gateway into the settlement and to ensure a strong green infrastructure network which retains and enhances existing natural assets. Another important design driver has been the need to successfully integrate the proposed community and commercial uses within the wider development in a way that maximises accessibility and place-making objectives.

***“Land East of Bilbrook will create the new arrival point into the existing settlement of Bilbrook, providing a distinctive and attractive gateway and sensitive edge to the countryside.***

***It will be a sustainable, well-connected neighbourhood for Bilbrook, centred around a new first school together with flexible community/employment space, potential convenience shopping and a central green, with residents having excellent sustainable links to existing facilities and employment opportunities, such as the shops/amenities on Bilbrook Road, the nearby train station, the enhanced Bilbrook playing fields and i54.***

***The new neighbourhood will have a diverse character, focussed around new and existing green and blue infrastructure, with green corridors and effective flood management creating a network of multi-functional communal space.***

***The homes will be highly energy efficient and sustainable, providing a variety of styles and accommodation to suit a range of established needs. The development will focus on achieving high environmental standards, energy efficiency and a regulated net zero carbon community”.***

# DEVELOPMENT OBJECTIVES

## Environmental

### Transport & Movement

The new neighbourhood will contain a network of connected tree-lined streets, with strong cycling and walking routes within the site. This network will be well-connected through multiple access points to the surrounding area, including convenient access to sustainable travel infrastructure and key off site walking/cycling routes, such as the i54 Sustrans route 81 (A National Cycling Network protected route) and nearby Bilbrook train station.

### Housing & Built Environment

The new neighbourhood will contain a number of character areas, drawing inspiration from relevant smaller historic village cores in the surrounding area and responding positively and relating well to the site surroundings, such as the canal corridor, street hierarchy, greenspace to the south, countryside edge to the north and existing urban grain of Lane Green Road etc. There will be a variety and mix of house types to accommodate a range of people including first time buyers, young families and elderly persons, with a focus on high environmental standards, energy efficiency and a move towards a net zero carbon community.

### Active, Inclusive and Safe

A range of suitable homes will be provided to meet established needs in respect of size, type, tenure and affordability in order to realise a balanced community.

### Environmentally Sensitive

New safe and attractive walking and cycling routes will be provided that link to existing, nearby green and sustainable routes, such as the canal corridor, and the Sustrans route 81 and to the existing Bilbrook playing fields. Existing ecological features such as hedgerows will be maintained and wildlife habitat enhanced as part of the creation of high quality Sustainable Drainage Systems (SuDS), that align with the new greenspace and green routes to create multi-functional amenity spaces and biodiversity corridors. A central green space will be created to form the heart of the neighbourhood and tree lined boulevards will create and attractive main route and promote

## Social & Economic

### Well served

A new first school will be provided in a central location, adjacent the green space and accessible by walking and cycling as well as by motor vehicles. This will create a focal point for the neighbourhood, where other flexible space for community/local employment uses could be introduced. A small local supermarket in the new neighbourhood could be provided to cater for local needs, with good walking and cycling links provided to Pendeford Mill Lane and Lane Green Road, enabling access to Bilbrook village centre.

### Thriving

The new neighbourhood is located within easy reach of local businesses, i54 and Wolverhampton City Centre, where employment opportunities exist. The scheme will connect with and contribute towards the improvement of sustainable transport links to both key employment locations.

### Well run

The existing and new residents within the community should be engaged to consider the future stewardship of the place and in particular the design, delivery and future management of the new facilities such as the neighbourhood centre/community space and green infrastructure network, including the potential for a future Community Trust to be established.

# 4. CONSTRAINTS & OPPORTUNITIES

## CONSTRAINTS & OPPORTUNITIES

The masterplanning process has been informed by a thorough understanding and appreciation of the site and surrounding context.

Desktop and physical assessments have been undertaken by a multi-disciplinary team of consultants to inform the development of the opportunities and constraints plan, which is illustrated on page 19. A summary of that work is provided below.

In summary, no technical barriers preventing the development of the site have been identified.

### Landscape Character

The site is located within the Sandstone Estatelands Landscape Character Type as documented by the Staffordshire Council document: 'Planning for Landscape Change: Supplementary Planning Guidance to the Staffordshire and Stoke on Trent Structure Plan 1996 – 2011.

The site generally accords with the key characteristics and descriptions as the woodlands and parklands of the traditional rural estates characterise the more intact parts of the rolling lowland landscape type. Acid sands and brown earths predominate and, whilst some significant remnants of the original heathlands survive, the major land use is now arable cropping in large hedged or open fields of a regular pattern. The character type borders onto the urban settlement edge of Bilbrook but other settlement is sparse and characterised by expanded hamlets and wayside cottages further east and north of the proposed development site. The basic former woodlands and parklands have been almost completely lost by historical agricultural practices. Recent enclosure of the land is indicated by the ordered nature of a planned functional landscape.

The proposed development site is not within an area of Landscape Sensitivity but all proposals will have to generally be compliant with South Staffordshire Local Plan and Core Strategy

(2012) Policy EQ4: Protecting and Enhancing the Character and Appearance of the Landscape:

*“The intrinsic rural character and local distinctiveness of the South Staffordshire landscape should be maintained and where possible enhanced. Trees, veteran trees, woodland, ancient woodland and hedgerows should be protected from damage and retained unless it can be demonstrated that removal is necessary and appropriate mitigation can be achieved. For visual and ecological reasons, new and replacement planting should be of locally native species”.*

Throughout the District, the design and location of new development should take account of the characteristics and sensitivity of the landscape and its surroundings, and not have a detrimental effect on the immediate environment and on any important medium and long distance views.

The siting, scale, and design of new development will need to take full account of the nature and distinctive qualities of the local landscape. The use of techniques, such as landscape character analysis, to establish the local importance and the key features that should be protected and enhanced, will be supported.

Proposals should retain and strengthen the components of landscape character and local distinctiveness, with particular attention to the detailing of any proposal and its relationship with existing buildings, features and vegetation.

### Visual Amenity

Visually, the wider landscape is a gently rolling, featureless landscape where the increasing intensification of the arable farming has led to almost complete destruction of the fabric of the landscape, ensuring that a high number of elements are visible. The present state of the hedgerows is generally poor and contain some remnant hedgerow oaks. Stream corridors in places provide the only intact landcover elements that provide some structure to this simple landscape however, these characteristics are not present within the site boundary.

Sensitive visual receptors are identified as being localised to the western edge accounting for the interface with the existing

residential area of Bilbrook, however, most dwellings back onto the site boundary with an array of garden fences and vegetation forming the settlement edge. From within the site a number of short to medium range views look out Dam Mill, Bilbrook Bridge and Balliol Business Park.

There are no public footpaths or bridleways that cross the proposed development site but the Monarch's Way travels along the towpath of the Shropshire Union Canal which is adjacent to the site's north eastern boundary. The landscape strategy proposes that substantial landscape buffers and planting are located in these locations to reduce any potential adverse effects on the visual amenity of these receptors.

Generally, the proposed development site is visually well contained when viewed from further afield. Views from the west are totally screened by the existing Bilbrook settlement and from the south by the vegetation on the railway line. Views from the east tends to be filtered between the buildings and edges of the Balliol Business Park.

Views are achievable into the site from Pendeford Mill Lane above the existing hedgerow vegetation but become limited further north due to the landform and vegetation within the existing countryside, however, the landscape strategy will ensure that appropriate planting is introduced to provide mitigation for any identified adverse effects.

Generally, it is not considered that any long term significant adverse effects will pervade in respect of the likely impacts on the landscape character and visual amenity.

### Existing Vegetation & Trees

The site comprises several parcels of land currently in agricultural use and used mainly for grazing.

Existing hedgerows define a number of the site's boundaries, including along Pendeford Mill Lane, Barnhurst Lane, Lane Green Road and the boundary with the railway line in the south-west corner. Internal field boundaries are also defined by existing hedgerows creating a strong and established green infrastructure network throughout the site.

# 4. CONSTRAINTS & OPPORTUNITIES

Existing trees within the site are largely confined to internal hedgerows although there are a scattering of individual trees towards the northern end of the site, including around the existing farm buildings.

A tree survey has been carried out to identify the quality and retention value of any trees within the site, with the presumption being to retain existing trees of value wherever possible and to integrate these within the landscape strategy and open space network for the site.

## Ecology

The majority of the site comprises species-poor semi-improved grassland managed through cattle and horse grazing and a cultivated field which are of relatively low ecological value, while habitats of greater ecological value include hedgerows, trees and the River Penk.

A suite of ecological surveys undertaken throughout the site have identified the presence of Badger setts and low usage of the site by common bat species, while three trees with the potential to support roosting bats are present within the site.

The River Penk, trees with potential to support roosting bats and Badger setts are to be retained and safeguarded as part of the development, while the proposals seek to minimize impacts to hedgerows and trees, with losses proposed only where necessary to facilitate access roads.

The large areas of proposed open space offers considerable enhancement opportunities over the existing situation. Through the creation of new habitats of greater ecological value such as wildflower grassland and attenuation features planted with native marginal species, the proposals would increase the floristic diversity of the site and represent enhanced opportunities for a range of wildlife including bats and Badgers.

At the south-west corner, adjoining the site boundary, there is a small existing pond which may present some ecological value and would be retained and enhanced as part of the development.

## Topography

Ground levels within the site are generally flat with some undulations. Levels across the site average around 105m AOD, rising to around 110m AOD across central parts of the site. Towards the southern end, the site slopes gently towards an existing watercourse (The River Penk) and open drain.

## Residential Amenity

The site forms a natural and logical extension to Bilbrook with existing housing development directly adjoining the site to the west. A suitable design response will be required to ensure that the amenity of existing residents living in houses adjoining the site is maintained.

The north-west corner of the site shares an interface with the Bilbrook Mill development which is currently under construction. The rear and side gardens of new properties within the Bilbrook Mill site would back onto the proposed site, requiring an appropriate design response.

Lane Green Road extends along the western site boundary. Along its eastern side are two small housing developments (Lane Green Farm and Lane Green Barns) which back onto the site. The western side of Lane Green Road is flanked by residential properties along its entire length although inter-visibility between the site and existing housing (which includes a number of single storey bungalows) is restricted by the existing hedgerow along the site boundary, tree planting in the front gardens of properties and within wide grassed verges along the street.

To the north, there are a small number of existing houses fronting onto the south side of Pendeford Mill Lane which back onto the site but which fall outside of the red line boundary.



# 5. CONSTRAINTS & OPPORTUNITIES

## Archaeology and Heritage

There are no designated heritage assets within the site or within such close proximity to the site that they would constrain development. The Shropshire Union Canal Conservation Area is located immediately to the east of the site and has associated listed, locally-listed and non-designated built heritage assets, including a Grade II listed milepost and aqueduct, locally listed Pendeford Bridge and aqueduct and two accommodation bridges. These heritage assets offer opportunities which have informed the concept masterplan, with the creation of a landscaped public space adjacent to Barnhurst Lane and the canal which is connected to the remainder of the site via a series of green corridors.

A desk-based assessment and geophysical survey have been completed for parts of the site and these suggest a low potential for archaeological remains. A former brickworks is recorded by the County Historic Environment Record just outside the site; however there are no above-ground remains and there is no evidence to suggest that quarrying or associated works extended into the site. Based on the available information, there are no archaeological constraints to development; a phased archaeological investigation will further inform the concept masterplan as the site moves forward.

## Access & Connectivity

There are currently two points of vehicular access into the site from Pendeford Mill Lane serving the agricultural buildings at the northern end of the site but which also provide access to the existing houses.

It is likely that a new primary access will be required onto Pendeford Mill Lane to serve the new housing development. There is an opportunity to provide this to the east of the current access to Bilbrook Mill (Phase 1) and west of Barnhurst Lane.

There is potential to create additional vehicular access points into the site from Lane Green road to the west; and from Barnhurst Lane Green Road to the east. This approach will ensure a permeable and connected development that ties in well with the surrounding neighbourhood and existing street network. It also allows vehicles to access the wider strategic road network (e.g. A449 and M54) efficiently and minimise the need for such traffic to use more sensitive routes in Bilbrook town centre.

There are no existing Public Rights of Way crossing the site. There is however a public footpath to the north (Bilbrook 3) which cuts across the recreation ground/skate park and connects Joeys Lane with Pendeford Mill Lane.

The section of Pendeford Mill Lane along the site's northern boundary also forms part of the local strategic cycle network and National Cycle Network (NCN) Route 81. Development of the site for housing presents an opportunity to create new pedestrian and cycle routes that connect it with the surrounding neighbourhood. These new links would improve access from the village area to major local employment areas to the south and east.

## Drainage

According to the Environment Agency (EA) Flood Map for Planning, the majority of the site is located within Flood Zone 1 (Low Probability), land defined as having less than a 1 in 1000 annual probability of river or sea flooding, as shown in Figure 1. A small portion of the site to the south is shown to be located within Flood Zones 2 (Medium Probability) and 3 (High Probability) of the River Penk and its tributary.

A hydraulic modelling exercise will be undertaken of the River Penk and its tributary within the vicinity of the site in order to provide flood extents and flood levels to inform the site layout and proposed mitigation. The hydraulic modelling will also, where possible, appropriately represent restrictive structures which may not be included within the flood map for planning and assess the projected impacts of climate change over the lifetime of the proposed development.



Example Attenuation Basin



Example Swale

# 5. CONSTRAINTS & OPPORTUNITIES

The majority of the site is shown to be at a low (1 in 1000-year) risk of surface water flooding. A pluvial flow route is shown to be present within the south of the site, attributed to the River Penk and its tributary. There are additional areas of isolated low to high (1 in 30-year) surface water flood risk, associated with topographical depressions.

Severn Trent Water sewer records show a rising main to be located within the west of the site. The rising main will require a 6m easement, 3m either side of the centreline. Two surface water sewers are also shown to outfall to the tributary of the River Penk, adjacent to the south western site boundary. These assets require 10m easement, 5m either side of the centreline. There are also several additional sewers within the site which will require associated easements.

The proposed development has also been assessed against a further range of potential flood risk sources including groundwater, canals and reservoirs. None of these flood sources have been found to represent a potential barrier to development.

An appropriate Surface Water Drainage Strategy which complies with the latest local and national advice will be implemented on the site to attenuate the increase in surface water runoff caused by development. As a first option, infiltration will be considered for the disposal of surface water. In the event that infiltration is not viable, the rate at which the runoff is discharged on site will be restricted to the equivalent greenfield runoff rate, preventing an increase in flows leaving the site and thus ensuring that the development does not have a detrimental impact upon flood risk elsewhere.

Through the application of Sustainable Drainage Systems (SuDS), the additional surface water will be stored within the site and subjected to multiple stages of treatment to guarantee that the water quality in the wider drainage network is protected. Wherever possible, SuDS features will be above ground to enhance the aesthetic amenity of the development and provide valuable habitats for the local wildlife.

The attenuation provided will be appropriately sized to include an allowance for climate change. Example SuDS features that will

be incorporated into the development wherever possible include attenuation basins, permeable paving and swales.

Foul drainage from the development will likely outfall via the existing Severn Trent Water infrastructure. The levels of the site are such that it is unlikely that a gravity connection would be achievable for the entire site to the public foul water network. It is, therefore, assumed that foul pumping stations will be required to be located at the lowest point within the developable area with a 15m cordon sanitaire where no habitable dwelling is permitted.

## Utilities

### Electricity

National Grid Electricity Distribution provide the local area with an established network of low voltage and high voltage infrastructure. No electricity infrastructure is located within the Site. Protection works will be required to the NGED substation located to the west of the site on Lane Green Road. The proposed site entrances on Barnhurst Lane, Pendeford Mill Lane and Lane Green Road are anticipated to require diversionary works due to the high voltage overhead cables that intersect them. There is currently insufficient capacity within the existing network and reinforcement works will be required to provide a supply the proposed development.

### Gas

Cadent Gas records confirm they have a network of Low Pressure (LP) and Medium Pressure (MP) gas mains in the local area. No Cadent Gas infrastructure located within the Site. It is anticipated the proposed site entrances on Barnhurst Lane, and Lane Green Road will require diversionary works by CG due to the LP and MP assets being adjacent to the site boundary within the verge/footpaths. The site entrance from Pendeford Mill Lane appears clear, with a LP gas main within the northern verge of the road. The current gas network has insufficient capacity to supply the proposed development and reinforcement to the network will be required. Cadent Gas propose a point of connection can be made from the medium pressure main within Lane Green Road.

### Clean Water

The clean water is provided by Severn Trent Water, clean water mains are located within the surrounding area of the Site, no clean water assets are present within the Site itself. Diversionary works are anticipated for the proposed site entrances on Barnhurst Lane and Pendeford Mill Lane due to assets being adjacent to the site boundary. The site entrance on Lane Green Road appears clear, with the clean water main being within the western verge of the road. There is insufficient capacity within the existing clean water network and reinforcement will be required, a new distribution main will be necessary to supply the proposed development. A point of connection can then be established from Pendeford Mill Lane and Lane Green Road.

### Wastewater

Severn Trent Water have multiple foul water assets located within the Site, including a 100mm sewer and Section 104 surface water sewers of various diameters. The 100mm foul sewer will require an easement of 6m (3m either side of the pipe) and the S104 surface water sewers will require an easement of 10m (5m either side of the pipe). Diversionary works are anticipated for the 225mm Cast Iron (CI) foul water sewer to the southwest from South Staffordshire Street Scene depot. To the east, there is a further 225mm Vitriified Clay (VC) foul water sewer from 10 Barnhurst Lane. A PAS128GPR survey is recommended. There is a 100mm Polyethylene (PE) foul sewer along with a Section 104 sewer, which appears to be accommodated within the masterplan spine road, therefore diversionary works are not anticipated on this asset. To the southwest, STW have a surface water sewer adjacent to Staffordshire Street Scene, which runs within the boundary. The masterplan appears to accommodate this. Severn Trent Water have provided two points of connection, the 225mm foul water network off the Droveaway and the 225mm foul water sewer on Lane Green Road, however, modelling will be required to assess the impact of the additional flows to each of these sewers.

# 5. CONSTRAINTS & OPPORTUNITIES

## Telecommunications

Openreach have an overhead cable to the northeast within the site boundary from Barnhurst Lane to Pendeford Mill Lane. There are 3no. telegraph poles in this location. An assessment would be required with Openreach on the option to ground this asset, alternatively can be retained within the masterplan. Diversionary works are anticipated for the site entrances on Barnhurst Lane and Pendeford Mill Lane, with Lane Green Road appearing clear of Openreach assets. The closest Openreach exchange to the site, Codsall (Exchange Code: Codsall), is circa. 1mile to the west on Histons Hill and is Fibre enabled to the cabinet (FTTC).

## Noise

From a review of available information, it is anticipated that the existing noise climate will be dominated by road traffic on Pendeford Mill Lane to the north and Lane Green Road to the west of the development site. Road Traffic flows on the remainder of the surrounding road network are not considered to be of a volume which is likely to result in significant impacts at the development.

Situated to the south-west of the development site is an existing railway line. Although it is considered likely that road traffic will be the more dominant source across the majority of the site, there is the potential for noise from the railway to be perceptible at the southern aspect of the development. It is considered that during the night-time periods noise from rail traffic is likely to be more perceptible, when background levels are considered likely to be lower.

Situated to the east of the development site is an existing commercial site with associated service yards and fixed plant. Although the site is setback from the commercial units, it is considered that during the night-time periods when road traffic is likely to be reduced, noise from the units may be perceptible at the site.

It is anticipated that with appropriate consideration to an acoustic mitigation strategy, levels of amenity could be achieved that

are appropriate for residential use. Mitigation measures could include:

- The location of buildings on site. The primary control factor is distance – the greater the distance from the source (e.g. road traffic), the lower the noise level. The type of intervening ground cover (acoustically absorbent or reflecting) and the height of the proposed properties will also influence the received noise level.
- Screening. Barriers or screens can reduce noise. They can take the form of an existing feature (for example a cutting), a purpose-designed feature (for example, a solid boundary fence or an earth bund or a combination of the two) or a purpose-designed building (for example, a linear barrier block).
- Building form and orientation. Limiting the view of the source by building orientation can reduce the received noise level. The buildings themselves can also be used to screen associated external amenity areas (i.e. by locating gardens behind the buildings).
- Building envelope. The final line of defence against external noise is the building envelope and in particular the glazing unit and ventilation package.

It is recommended that a noise impact assessment of the site is undertaken, which should be based on a noise survey, to fully inform the design of any such mitigation measures.

## Ground Conditions

The site is underlain by superficial geology comprising localised Glacial Till in the south and north of site, Glaciofluvial Deposits and Alluvium in the south of the site, and Head Deposits in the west of the site. The superficial deposits are underlain by bedrock of the Helsby Sandstone Formation. The Site is not located in a Coal Mining Reporting Area. Historical mapping indicates that the site has remained undeveloped, and apparently utilised for



# 5. CONSTRAINTS & OPPORTUNITIES

agricultural purposes. Phase 1 Geo-Environmental Assessments have not identified pollutant linkages which would represent a significant risk to human health or controlled waters associated with the proposed development.

## Air Quality

The proposed development is not located within an Air Quality Management Area (AQMA). The nearest AQMA to the site is the Wolverhampton Air Quality Management Area 2005, which is located 80m south east of the site and was designated for the potential exceedance of both the annual mean nitrogen dioxide (NO<sub>2</sub>) and daily mean particulate matter (PM<sub>10</sub>) air quality objectives.

Local air quality monitoring in the vicinity of the site recorded annual mean NO<sub>2</sub> concentrations well below the annual mean air quality objective in recent years. The local monitoring locations are situated adjacent to heavily trafficked A-roads which experience higher levels of traffic relative to the minor roads that surround the site. Therefore, pollutant concentrations across the site are considered to be lower than those recorded and it is therefore unlikely that pollutant concentrations within the site will exceed the current relevant air quality objectives.

The Wolverhampton to Shrewsbury railway line borders the southern boundary of the site. This railway line is not identified within Defra guidance as a line experiencing heavy traffic of diesel passenger trains. In accordance with Defra guidance, emissions associated with the railway line are unlikely to significantly influence air quality within the site.

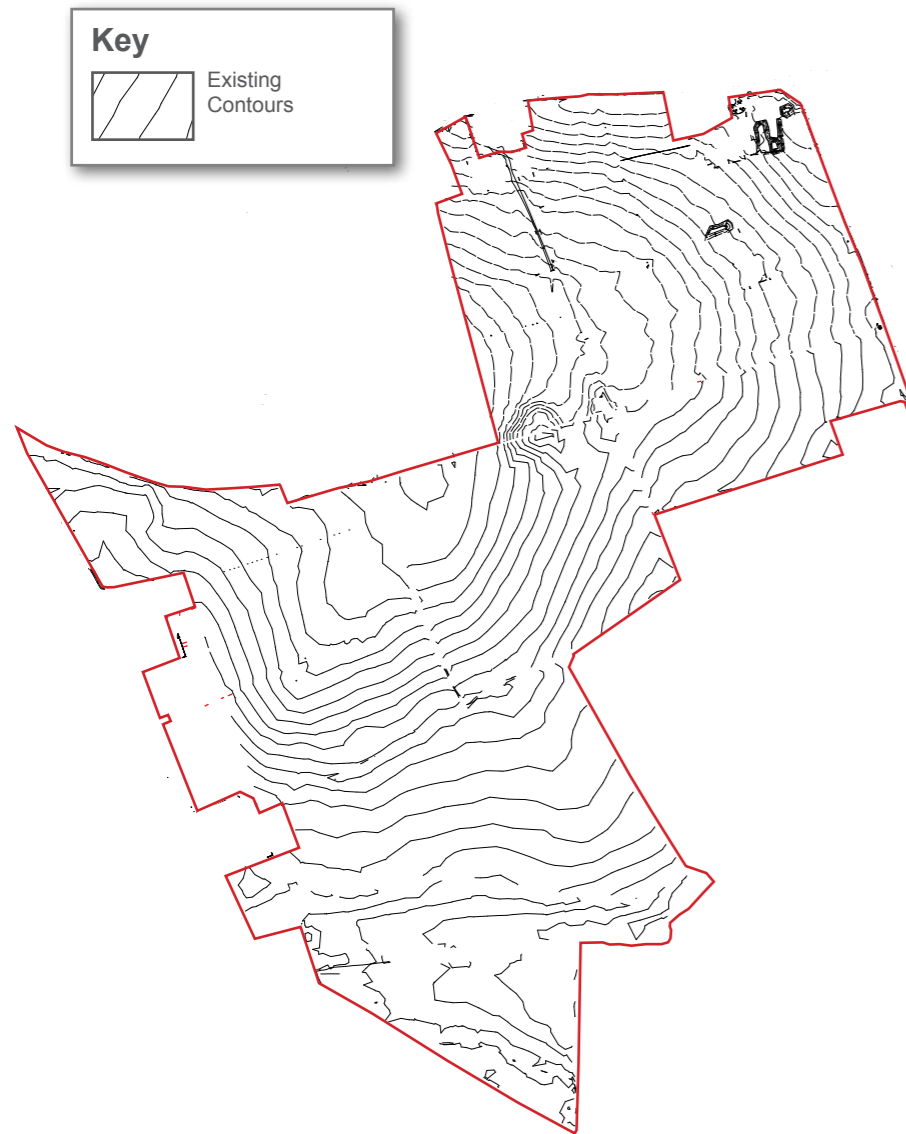
The proposed development lies in close proximity to the Cargill Meats factory; however it is understood that the factory undertakes further processing of chicken rather than the initial processing of chicken, e.g. slaughtering. It is therefore considered that operations at Cargill Meats would not represent a significant source of odours in the vicinity of the site. In addition, the Bilbrook Wastewater Treatment Works (WwTW) lies approximately 250m north of the proposed development. However, the site is

located upwind of the WwTW and there are existing residential receptors located between the WwTW and the site. Therefore it is considered unlikely that odours associated with the WwTW would influence the amenity of the site.

A detailed air quality assessment will be undertaken as part of the planning application to consider potential impacts of the proposed development during both the construction and operational phases. Measures to reduce dust emissions during the construction phase and road traffic emissions associated with the operation of the proposed development will be included within the proposed development.







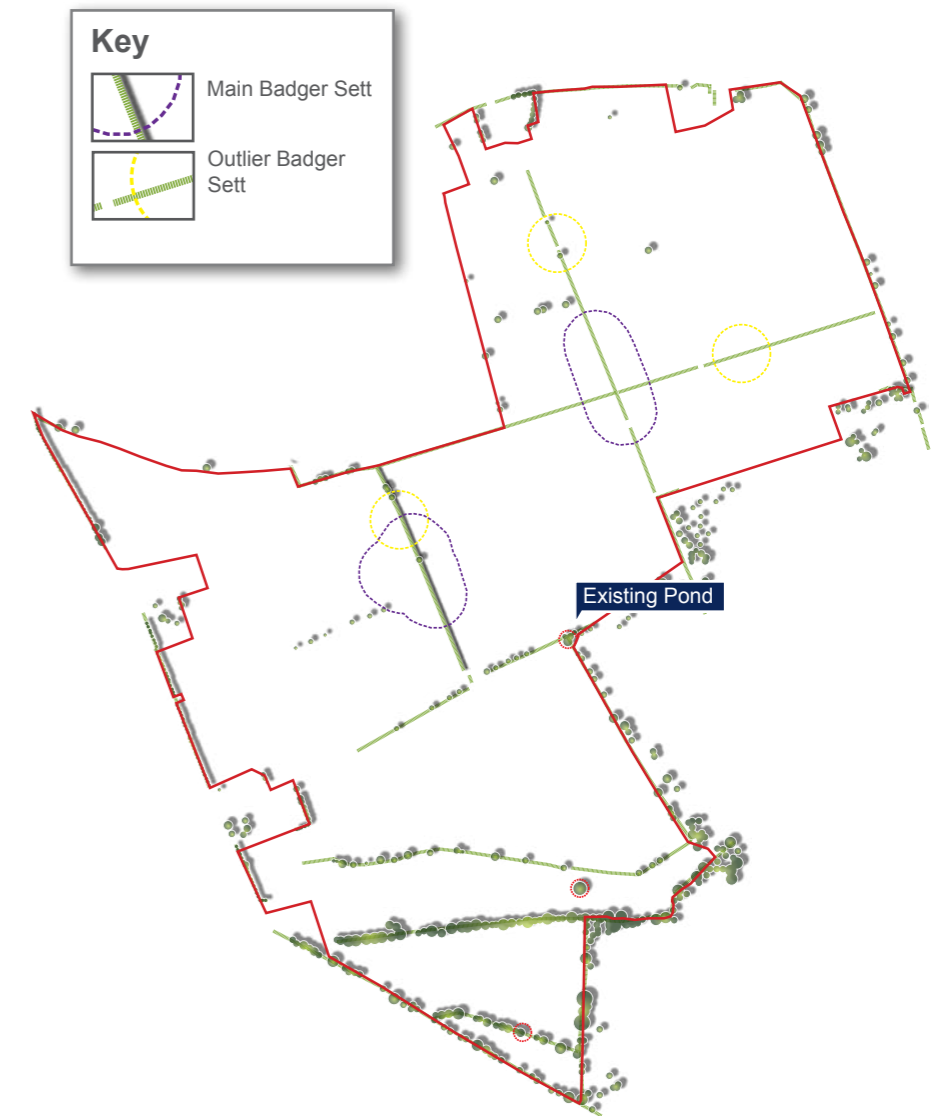
## Topography

- Ground levels within the site are generally flat with some undulations.
- Levels across the site average around 105m AOD, rising to around 110m AOD across central parts of the site.
- Towards the southern end, the site slopes gently towards an existing watercourse (The River Penk) and open drain.



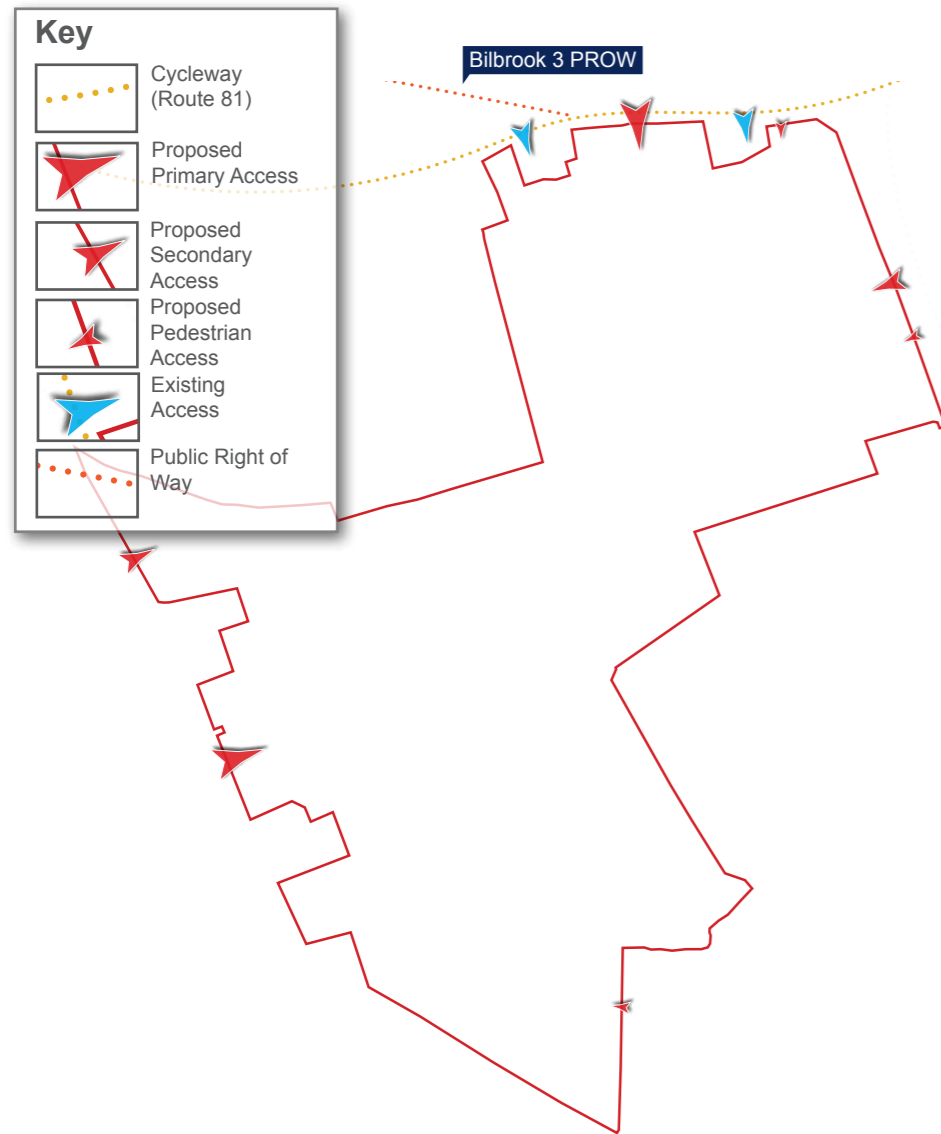
## Vegetation

- Existing hedgerows define a number of the site's boundaries.
- Internal field boundaries are also defined by existing hedgerows creating a strong and established green infrastructure network throughout the site.
- Existing trees within the site are largely confined to internal hedgerows.
- Three trees with the potential to support roosting bats are present within the site.



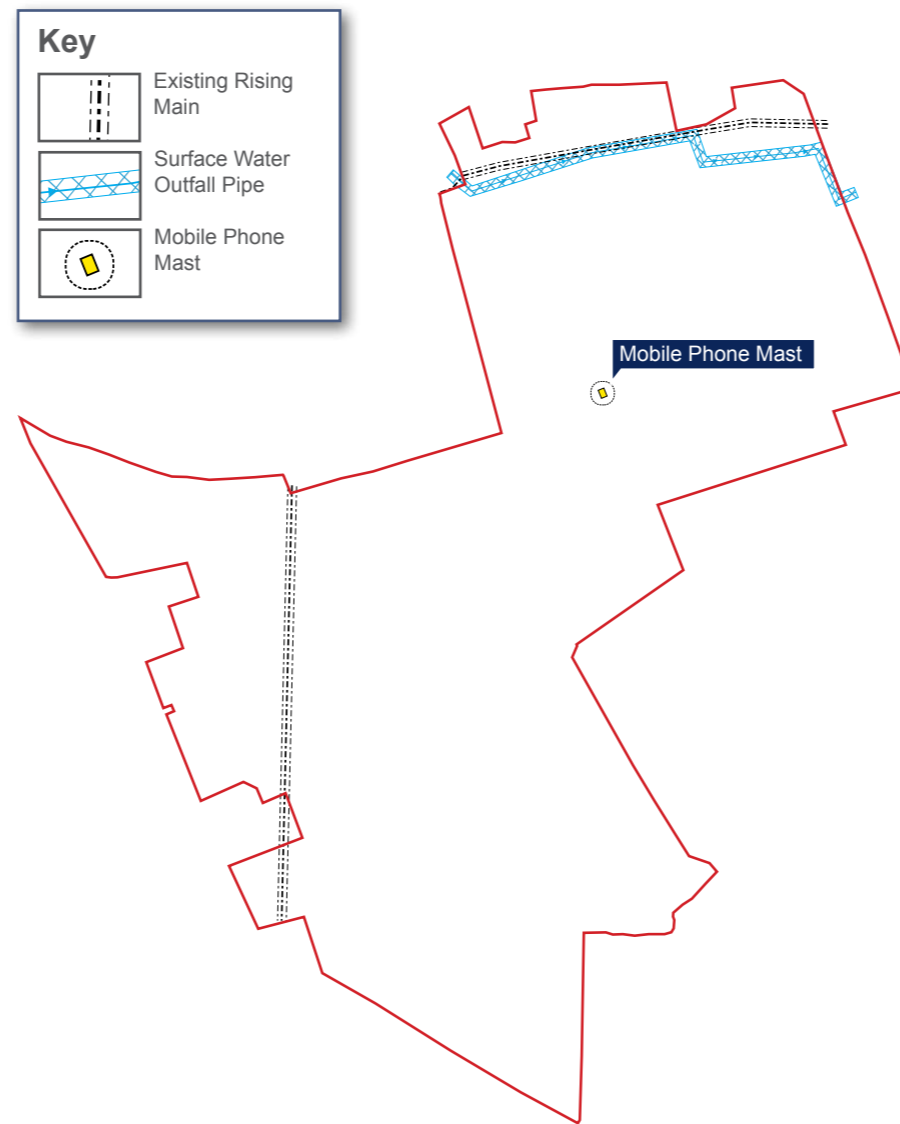
## Ecology

- The majority of the site comprises species-poor semi-improved grassland and a cultivated field which are of relatively low ecological value.
- Habitats of greater ecological value include hedgerows, trees and the River Penk.
- Surveys have identified the presence of Badger setts (main and outliers) which will require a 30m exclusion zone.
- At the south-west corner, adjoining the site boundary, there is a small existing pond which may present some ecological value and would be retained and enhanced as part of the development.



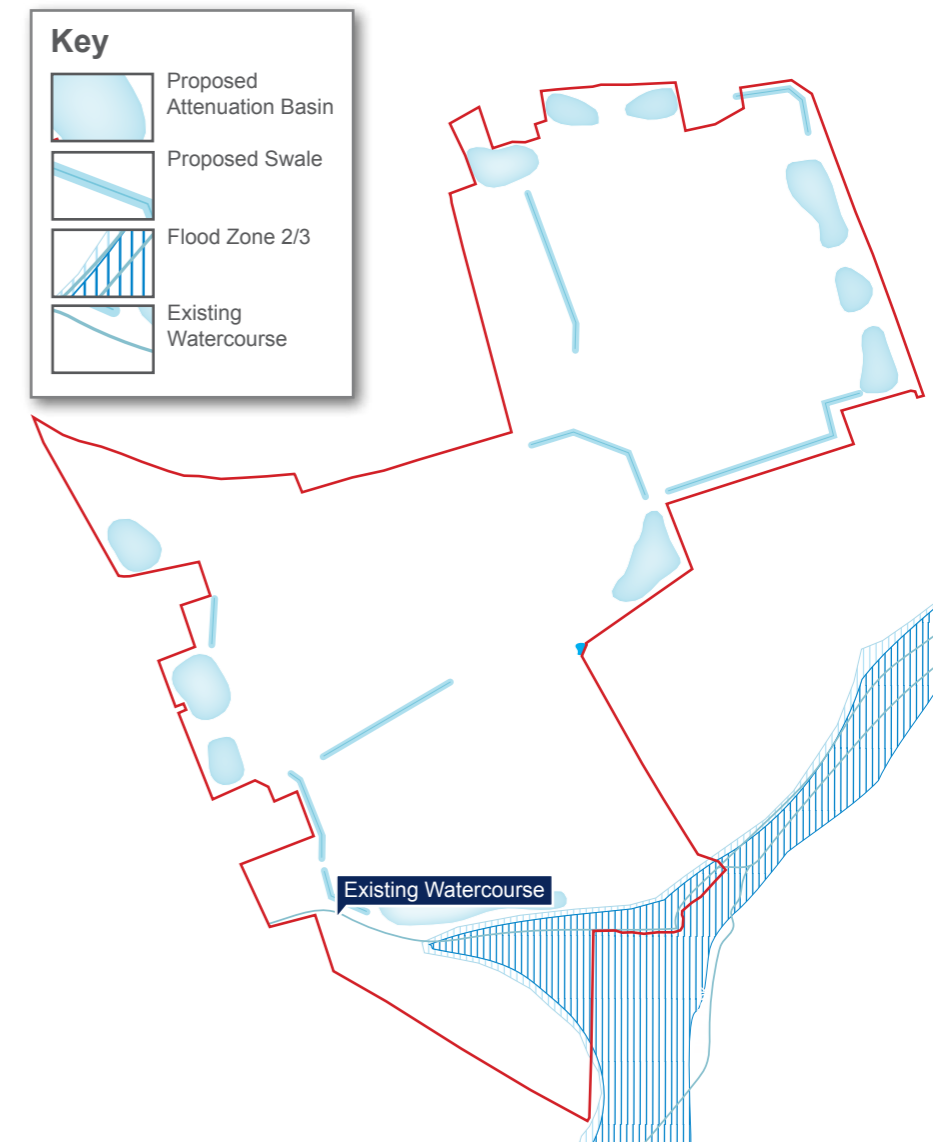
### Access & Connectivity

- Two existing points of vehicular access into the site from Pendeford Mill Lane. Opportunity to provide new primary access to the east of the current access to Bilbrook Mill and west of Barnhurst Lane. Potential to create additional vehicular access points into the site from Lane Green road to the west; and from Barnhurst Lane Green Road to the east.
- There are no existing Public Rights of Way crossing the site. Public footpath (Bilbrook 3) cuts across the recreation ground/skate park and connects Joeys Lane with Pendeford Mill Lane.
- Pendeford Mill Lane along the site's northern boundary forms part of the local strategic cycle network and National Cycle Network (NCN) Route 81.



### Utilities


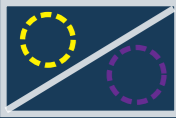












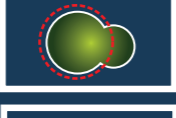

- Existing rising main crosses north-south across western part of the site (assumed 3m easement from centreline).
- Existing rising main and surface water outfall from Bilbrook Mill crosses northern part of the site and will require diverting.
- An existing mobile phone mast is located towards the centre of the site and will remain in situ within an area of open space.



### Flooding & Drainage

- The natural topography of the site lends itself to a network of swales and attenuation features located on lower ground around the edges of the site.
- The majority of the site falls within Flood Zone 1 (low risk). However a small part of the site at the southern end falls within Flood Zones 2 & 3.
- An existing watercourse crosses the southern part of the site (partly within an open drain).

# Key

-  Site Boundary
-  Badger Setts (30m buffer)  
Outliers/Main Setts
-  Existing Hedgerows
-  Existing Trees
-  Green Infrastructure/Buffer/Wildlife Corridor
-  Existing Public Rights of Way/Footpaths
-  Existing Strategic Cycleway Route
-  Existing Contours
-  Mobile Phone Mast
-  Flood Zone 2/3
-  Sensitive Interface Residential Uses
-  Existing Watercourse/Ditch
-  Primary Access Point
-  Secondary Access Point
-  Potential Footpath/Cycle Link
-  Key Views
-  Surface Water Outfall (10m easement)
-  Existing 150mm Foul Rising Main
-  Potential Pedestrian/cycle links to Bilbrook Mill
-  Trees with Potential to support roosting bats
-  Proposed Attenuation Basins and Swales



# 6. THE MASTERPLAN

## THE MASTERPLAN

### Introduction

An illustrative masterplan has been produced for the site which is presented below and described over the following pages.

The masterplan demonstrates that a high quality residential-led development can be accommodated on the site in a way that responds positively to the unique constraints, opportunities and local context and meets the Council's vision and objectives for the site.

The masterplan is consistent with the Concept Plan included within the Publication Local Plan in terms of land-use, landscape strategy, access and connectivity. However the masterplan also takes into account a range of technical constraints and surveys that have impacted on the structure and layout of the development. This includes, for example, drainage information and detailed ecological surveys that were not factored into the initial Concept Plan. Nevertheless, there remains broad consistency between the two plans in terms of the key design principles and parameters.

The masterplan has been informed by the relevant site-specific vision, objectives (summarised opposite) and concept plan as set out in Policies SA1 – SA4 and is intended to ensure that development for the whole site is delivered in a comprehensive and coordinated manner and is of sufficient quality.

At this stage, the masterplan is intended as an illustrative plan and will be subject to further refinement following consultation with the Council and other stakeholders.

### Policy SA1 – Strategic development location: Land East of Bilbrook

The SMP will include the following:

- a) Up to 800 new homes;
- b) Affordable housing and a specialist elderly housing element (e.g. sheltered or extra care) of at least 40 units in accordance with other policies within the local plan;
- c) A Community Hub focused around a central area of communal green space, well connected to the site wide green infrastructure network, to contain:
  - Small local convenience retail to serve the day to day needs of the neighbourhood
  - Flexible community space
  - A new First School (1.3ha)
- d) Vehicular accesses onto Pendeford Mill Lane, Lane Green Road and Barnhurst Lane and appropriate public transport provision to support sustainable travel from the scheme;
- e) High quality active travel links through and beyond the site, including to the recreational green space to the north, local shops and rail station in Bilbrook and the Sustrans network to the east;
- f) A network of green and blue infrastructure consistent with the indicative layout on the Concept Plan, providing for high quality Sustainable Drainage Systems, open space, play, biodiversity net gain and active travel, including a large central green space at the heart of the development and additional compensatory Green Belt improvements on the land identified as off -site green infrastructure to the south of the site in accordance with Policy DS2;
- g) Enhancement of and provision of additional playing pitches and associated facilities in the existing recreational open space to the north of Pendeford Mill Lane, including improved active travel links from the new neighbourhood;
- h) Any necessary historic environment mitigation identified in the council's Historic Environment Site Assessment Stage 2 (2022), including setting back development from the site's eastern edge and reinforcing planting within that boundary; and
- i) Necessary contributions towards offsite infrastructure, including highways and active travel mitigation measures, education, leisure and health provision.
- j) Development of the site should be in accordance with the recommendations set out in the Level 2 Strategic Flood Risk Assessment detailed site summary table.

# 6. THE MASTERPLAN

## Key Design Features

- 1 Primary vehicular access into the site from two locations along Lane Green Road and Pendeford Mill Lane.
- 2 Secondary vehicular access off Lane Green Road and Barnhurst Lane.
- 3 Tree-lined avenue forms central spine road through the development and will be designed to accommodate bus services.
- 4 Community hub comprising new First School, small scale local retail, play area and Community Square linking with the adjacent public open space.
- 5 Network of green corridors centred along retained hedgerows and accommodating pedestrian and cycle links.
- 6 Large area of retained open space located at the southern end of the site that will be managed and improved for biodiversity gain.
- 7 Central greenspace connecting with the proposed Community Square and wider green infrastructure network.
- 8 Network of attenuation basins set within areas of greenspace and located at key gateways into the site, providing amenity and biodiversity benefits.
- 9 Secure boundary created to rear gardens of existing houses along Downie Road.
- 10 Houses along eastern boundary setback from Shropshire Union Canal to preserve setting of the canal and provide opportunities for introducing tree planting and soft landscaping.
- 11 Layout ensures appropriate interface with Bilbrook Mill development to ensure acceptable levels of amenity, privacy and security to new and existing houses.
- 12 Green buffers to site edges to filter views of the development from surrounding countryside.



# 6. THE MASTERPLAN

## USE & QUANTIUM

The masterplan proposes a residential-led development comprising up to 800 new homes with associated access, infrastructure and open space.

The masterplan identifies approximately 20.14ha of developable land for housing. An additional 2.7ha is set aside for other uses including a new local centre, extra care facility, primary school and community square. Approximately 17.0ha is undeveloped land, comprising public open space, green corridors, buffer planting, play areas or land required for drainage and attenuation.

The housing mix is likely to include a mix of apartments, terraces, detached and semi-detached houses ranging in size from 1 and 2 bed apartments to 2,3,4 and 5 bed houses. The proposals also include a specialist Extra Care facility of up to 75 beds.

At the heart of the development will be a new mixed-use community hub and local centre that will likely include a small convenience store and other small scale retail units serving a local need. A new primary school is also proposed.

The centrepiece of the community hub will be a new Community Square. This will be designed as a flexible space providing opportunities for a range of local events and activities (e.g. outdoor market, performances, community events etc). The Community Square space will also accommodate a children's play area.

The Square will have a strong physical and visual relationship with the adjacent greenspace which will provide an attractive green backdrop as well as providing opportunities for activity within the Square to spill out into the wider landscape.

## ACCESS

The major objectives of the site access strategy are:

- To create a permeable development that encourages walking and cycling, particularly to local facilities in the village and the railway station.
- To enable the development to be served by bus services thus bringing all residents within a reasonable walking distance of the public transport network.
- To provide efficient vehicle access to the external highway network without giving rise to significantly increased traffic demands within Bilbrook village centre.

To achieve these objectives, the development would be served by a network of connected streets together with traffic free walking and cycling routes that are attractive and safe.

There would be new vehicle accesses at the following locations:

- Pendeford Mill Lane (west of Barnhurst Lane);
- Barnhurst Lane;
- Lane Green Road.

A Spine Road would connect the Pendeford Mill Lane, Barnhurst Lane and Lane Green Road accesses. It would be designed to serve the needs of the development and distribute traffic onto the external highway network such that development traffic with destinations to the east and south of Bilbrook does not need to use Duck Lane or other sensitive routes within Bilbrook village centre. It would enable such traffic to efficiently reach the strategic highway network (A449 and M54) via Wobaston Road, and Wolverhampton city centre via Barnhurst Lane.

To enable the Spine Road to serve as a bus route, it would be constructed to the standards required by Staffordshire County Council (SCC) and is expected to have a carriageway width of 6.5m and 3.0m wide foot/cycleways to each side. However, the Spine Road is not intended as a through-route for non-development traffic and is expected to include design features to reduce vehicles speeds and give priority to pedestrians and cyclists where required.

It is anticipated that internal connected roads not forming part of the bus route would have a reduced carriageway width and 2.0m wide footways to each side.

It is recognised that the development and proposed school could also attract traffic with origins and destinations to the north and west via Duck Lane and Lane Green Road through the centre of Bilbrook. The need to manage traffic within this area is recognised and proposals have been presented within the Strategic Transport Assessment for further discussion and development. This includes both traffic management arrangements and upgraded pedestrian/cycle facilities to maximise the use of non-car modes for such trips.

To improve access to the strategic cycle network, the Wobaston Road/Barnhurst Lane junction would be upgraded to traffic signal control with integrated pedestrian/cycle crossing facilities. The new crossing points would be directly connected to the site via a dedicated Non-Motorised User (NMU) access. The new facilities would significantly improve access to the canal towpath and the existing foot/cycleway on the north-side of Wobaston Road. The latter is an important link to the i54 employment area and would also be upgraded as part of a package of off-site highway improvements.



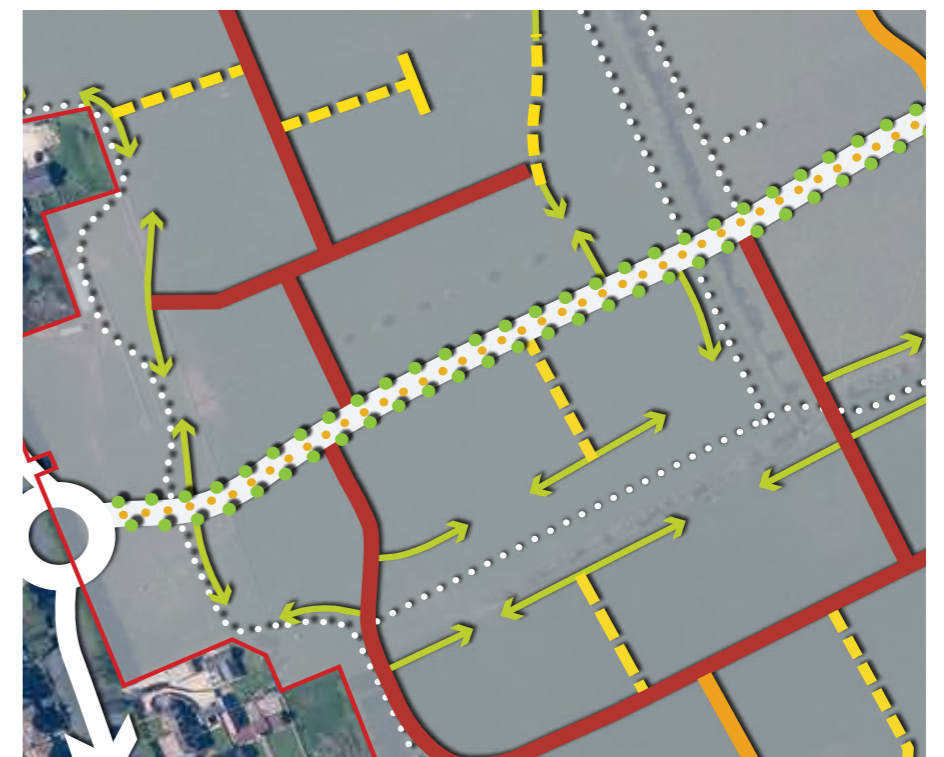
# 7. URBAN DESIGN FRAMEWORK

## URBAN DESIGN FRAMEWORK

The images over the following pages illustrate the urban design framework underpinning the illustrative masterplan.

The images illustrate the proposed land-use mix and distribution, movement pattern/street hierarchy, green and blue infrastructure network and location of key gateways, feature buildings and focal spaces.

These elements have created the basic structure around which the masterplan for the site has evolved.





# 7. URBAN DESIGN FRAMEWORK

## LAND-USE

The plan opposite illustrates the proposed distribution of different land-uses across the site. The proposal is for a residential-led development set within an attractive landscape setting with ancillary community and commercial uses to create a vibrant and sustainable community. At the heart of the development will be a new mixed-use community hub and local centre. The community hub is located centrally within the site for ease of access by new and existing residents and benefits from direct access onto the proposed spine road and public transport corridor.

In summary, the development will comprise:

- Up to 800 new homes;
- Extra-care accommodation (0.6ha) - minimum 40 beds (up to 75);
- A new first school (1.3ha) with associated playing fields and areas for outdoor play and learning;
- A new local centre (0.5ha) with potential for a small convenience store, children's nursery and/or other small retail and commercial units;
- A new Community Square - a flexible space providing opportunities for a range of events and activities (e.g. local market, outdoor performances, community events etc);
- A centrepiece equipped play area will be located within the Community Square, and additional 'trim trail' and natural 'play on the way' facilities will be located in the green corridors throughout the site; and
- On-site open space in the form of amenity spaces, green corridors, buffer planting and incidental open spaces together with a network of attenuation basins and swales.



Key	
	Residential
	School
	Extra Care Facility
	Retail/Local Centre
	Open Space
	Attenuation Basins
	Community Square
	Play Area

# 7. URBAN DESIGN FRAMEWORK

## MOVEMENT HIERARCHY

The development will comprise a clear and legible movement hierarchy comprising an inter-connected network of primary and secondary streets and shared private drives.

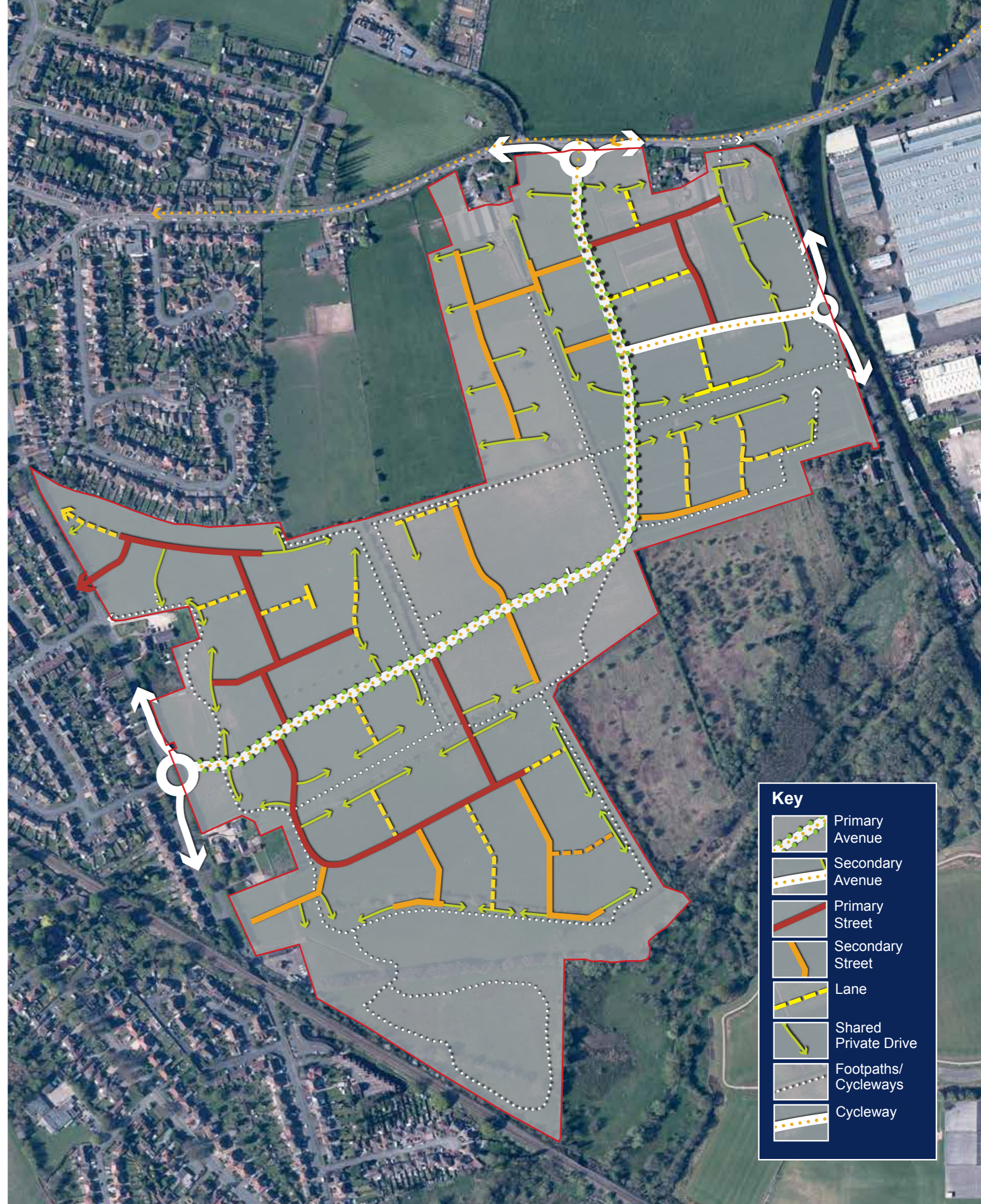
A tree-lined avenue connects Pendleford Mill Lane and Lane Green Road and provides the primary route through the site. The Spine Road would be to SCC Residential Design Guide standard for a bus route with a 6.5m carriageway, 3.0m foot/cycleway on at least one side and a 2.0m wide footway on the other.

A series of primary and secondary streets extend off the primary avenue serving development parcels off the main route.

A series of intimate lanes will be introduced to provide character to the development will be designed along home-zone principles with a shared-surface carriageway finished in high quality block paving to give a strong residential character.

Around the edges of the site and adjacent to green corridors, houses are typically served by shared private drives for a softer transition with the adjacent green spaces.

Below the formal street hierarchy, a network of pedestrian and cycle routes will be provided through the development's green spaces. Where possible, footpaths will follow likely desire lines and are directed to pass balancing ponds and other landscape features to provide points of interest along the routes. Paths would be between 2 and 3 metres depending on the nature and intended use of the paths by pedestrians and/or bicycles.



Key	
	Primary Avenue
	Secondary Avenue
	Primary Street
	Secondary Street
	Lane
	Shared Private Drive
	Footpaths/Cycleways
	Cycleway

# 7. URBAN DESIGN FRAMEWORK

## GREEN INFRASTRUCTURE

The masterplan adopts a landscape-led approach which seeks to retain and enhance the site's existing green infrastructure network as the structuring framework around which development parcels are organised. A key feature of the development will be a series of green corridors/linear parks focussed along retained hedgerows and field boundaries. These linear landscape features will help to provide a sense of openness within the development, providing visual relief to the built form. They also provide corridors for the movement of wildlife and allow visual connections to the wider countryside. Pedestrian and cycle routes through the green corridors will provide circular recreational routes through the site. Key elements of the landscape strategy for the site include:

- A clear hierarchy of open spaces catering for a range of different needs including a Central Green located at the heart of the development;
- A network of green corridors centred along existing/retained hedgerows;
- A positive tree strategy designed to assist way finding and reinforce character areas within the development;
- Retention of a large area of open space at the southern end of the site (west of the River Penk) which will be managed for biodiversity gain;
- Provision of appropriate buffers and development offsets to the site edges, including along Land Green Road, Pendeford Mill Lane and Barnhurst Lane; and
- Sustainable Urban Drainage features incorporated into the landscape structure of the Site in the form of a network of naturalistic attenuation basins and linear swales.



# 7. URBAN DESIGN FRAMEWORK

## BLUE INFRASTRUCTURE

The proposed development will include a positive surface water drainage system that will intercept the majority of run-off generated within the Site itself, hence minimising the risk to new buildings and also reducing the incidence of overland flow causing flooding at the Site or across adjacent land.

The mitigation of surface water run-off from the site will be achieved through the incorporation of a Sustainable Urban Drainage Scheme (SUDs). Such systems provide the potential to significantly reduce the risk of flooding, enhance the habitat potential for wetland species and avoid the need for highly engineered drainage solutions. Features such as swales and attenuation basins allow discharge to local outfalls at greenfield runoff rates and can significantly reduce the level of pollutants and other contaminants.

An indicative SUDs strategy is shown on the masterplan, key elements being:

- A network of naturalistic attenuation basins working with the natural topography of the site and located to provide attractive gateway features where possible;
- Incorporation of linear swales within green corridors and landscape buffers; and
- Minimising the amount of hard-surfacing and impermeable surfaces across the site through the incorporation of large areas of open space, retention of existing hedgerows and provision of generously sized private gardens.



# 7. URBAN DESIGN FRAMEWORK

## GATEWAYS, LANDMARKS & NODES

The plan opposite illustrates the key pedestrian and vehicular gateways into the development. It also shows potential locations for feature buildings and focal spaces within the development.

Gateways are crucial in providing the all important first impression of a development and creating a sense of arrival. In this instance, gateways into the site from Lane Green Road, Pendeford Mill Lane and Barnhurst Lane are flanked with naturalistic attenuation basins that will be planted with marginals and wildflower mixes to create attractive green gateways into the site. Houses will be orientated to benefit from attractive views towards these attenuation features and provide an outward-looking development.





A series of focal squares are proposed throughout the development to provide features of interest and focal points within the development. Located at key intersections in the movement hierarchy, these spaces will be designed as features of public realm, providing opportunities for introducing high quality block paving and softer landscape treatments.

Several locations have been identified where it would be appropriate to provide landmark or feature buildings. Typically, these buildings would be larger or taller buildings, with strong or bespoke design features or highlighted by a change of materials. Their role is to provide landmarks, aid wayfinding and provide enclosure/ containment to key public spaces. Landmark buildings also help to provide a strong sense of identity and character to the development. The illustrative masterplan shows a number of potential locations for these elements of built form:

- Framing focal squares and key access points into the site;
- Terminating key vistas along primary streets; and
- Adjacent to key open spaces such as the proposed Community Square.



**Key**

-  Gateways
-  Feature/Focal Buildings
-  Focal Squares
-  Key Vistas

# 7. URBAN DESIGN FRAMEWORK

## COMMUNITY HUB

Located towards the centre of the site, along the main spine road and within easy access of all parts of the site will be a Community Hub serving the development and wider community.

The Community Hub will be anchored by a small local centre offering convenience food shopping and other small scale retail. An Extra Care facility is also proposed in this location along with the proposed primary school.

These uses will be clustered around a new Community Square - a flexible space providing opportunities for a range of local events and activities (e.g. market, outdoor performances, community events etc). The Community Square space will also accommodate a children's play area.

Framing the square to the north will be a small apartment building with potential for commercial uses such as a cafe on the ground floor to help activate the space.

From within the Community Square, attractive views will be possible towards and along the green corridor and Central Green flanking its western edge, which will function as an informal extension to the space and attractive natural backdrop.



# 8. PHASING & DELIVERY

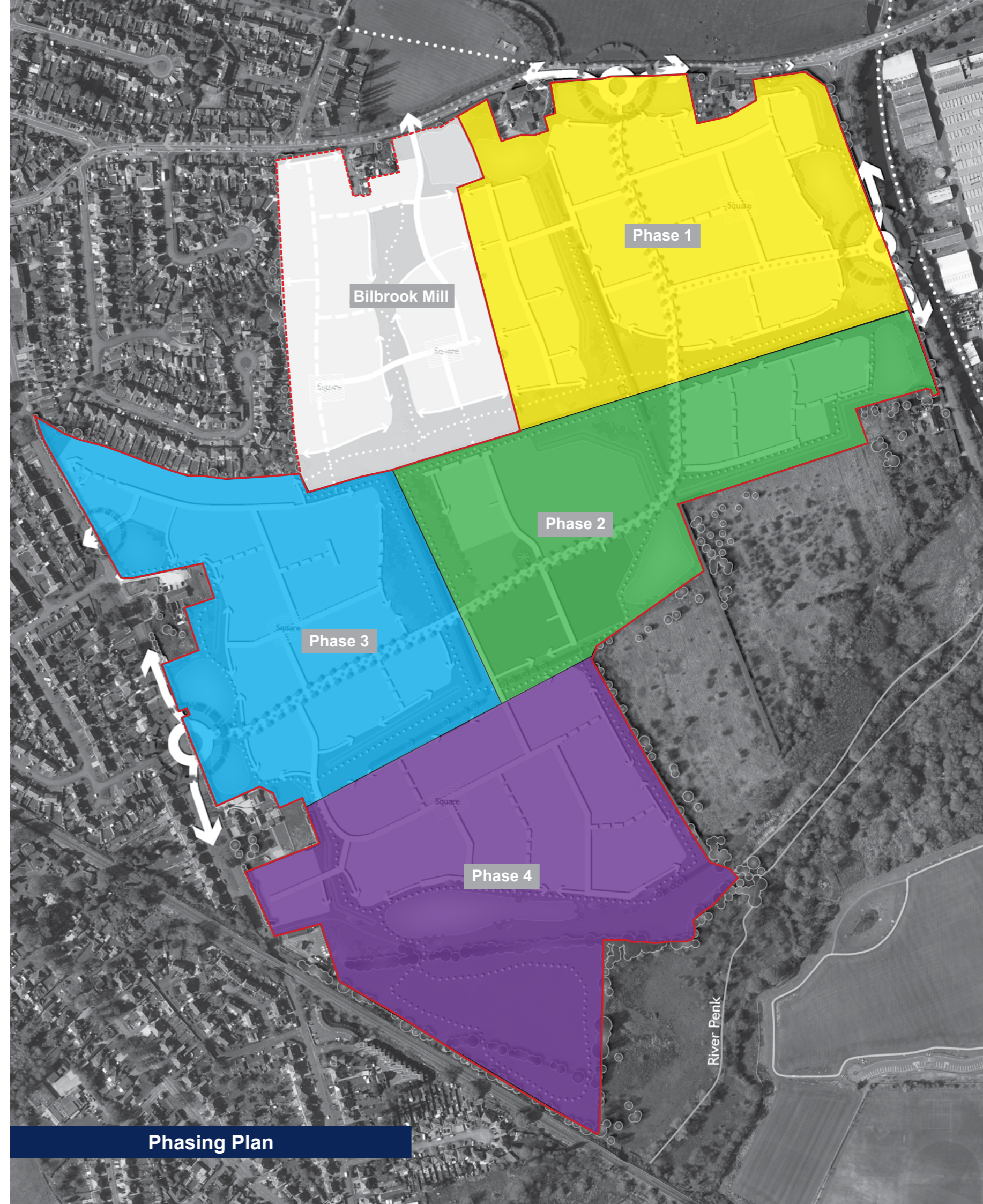
## PHASING

The development would be delivered in four phases which will each deliver around 60 new homes per annum, comprised of both market homes delivered by a housebuilder and affordable homes delivered by a registered provider. This reflects the strength of the market in and around Bilbrook, the scale of pent-up demand for new homes, and Bloor's recent experience of delivery in other similar and nearby housing markets.

The delivery of new infrastructure will be phased throughout the build period via a programme agreed with South Staffordshire Council and other stakeholders. This infrastructure will include the following:

- Primary spine road
- Drainage infrastructure
- Play Areas
- Community Hub including local centre and Extra Care facility
- Public Open Space and Recreational areas
- A new primary school

The first phase of development will take place in development parcels to the east of Bilbrook Mill, extending eastwards to the canal. This initial phase is expected to comprise 260 new houses including a mix of dwelling sizes ranging from 1 & 2 bed flats to 2, 3, 4, and 5 bed houses. This phase would also include a new accesses onto Pendford Mill Lane and Barnhurst Lane, the first section of spine road, areas of public open space and series of attenuation basins.



# 8. SUMMARY & CONCLUSIONS

## SUMMARY

This document has been prepared for Bloor Homes by a multi-disciplinary, professional consultancy team. It provides a development framework for the delivery of a residential led scheme for land east of Bilbrook, South Staffordshire.

The emerging masterplan presented within this document, together with the development framework which underpins it, demonstrates the commitment of Bloor Homes to deliver a high quality development befitting of the site's strategic importance and location at a key gateway into Bilbrook.

The masterplan responds positively to the unique constraints and opportunities of the development site and has regard to best practice in the design and layout of new housing developments. The development framework will successfully deliver the Council's vision and objectives for the site and is consistent with the key design principles illustrated by the Concept Plan.

This document demonstrates that there are no physical, environmental, ecological or other constraints preventing the site coming forward for housing and concludes that the site can achieve sustainable development that is well-designed and responsive to the local context.

The development framework presented here will inform the preparation of a side-wide Strategic Master Plan (SMP) through further stakeholder and local community engagement to inform the preparation of a planning application in due course.





# KEY DELIVERABLES



## Homes for all

Up to 800 market and affordable homes with a variety of housing sizes and tenures to appeal to a range of people including first time buyers, young families and elderly persons. The development will also include a specialist elderly housing element in the form of an Extra Care facility providing up to 75 beds.



## Open Space for Recreation & Well Being

The development will deliver approximately 17ha of open space, circa 40% of the site, focussed on maximising the retention of existing hedgerows which will break up the form of the site creating a more rural appearance. These improvements will also allow the existing community and potential new residents to have better access to nature and open space, benefitting health and well being whilst reinforcing the local character within Bilbrook.



## New Primary School

A new first school will be provided in a central location, adjacent to green space and accessible by walking and cycling as well as by motor vehicles. Located adjacent to the proposed Community Square, the school will be a focal point within the development.



## Improving Connectivity

Provision of a new link road between Lane Green Road and Pendeford Mill Lane, to relieve congestion in Bilbrook. A network of pedestrian and cycle connections that connect the development to its open spaces and surrounding community including the recreational green space to the north, local shops and rail station in Bilbrook and the Sustrans network to the east.



## Community Hub

The development will include a Community Hub located centrally within the site and serving the development and wider community. The Community Hub will be anchored by a local convenience store and other small scale retail. A new Community Square will provide a flexible outdoor space for a range of community events and activities.

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