

SOUTH STAFFORDSHIRE LOCAL PLAN 2018-38 PREFERRED OPTIONS

LAND EAST OF BILBROOK

ON BEHALF OF BLOOR HOMES



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

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1. Introduction

1.1 This representation, submitted on behalf of Bloor Homes, responds to the Regulation 18 'Preferred Options' 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.

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 undertaking 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 2038 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, which identified a proposed settlement hierarchy and an 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 Preferred Options consultation document identifies preferred site allocations to meet the preferred strategy, including Land East of Bilbrook which is included as a proposed Strategic Development Location (Policy SA1).

Question 1: Do you agree that the evidence base set out in Appendix A is appropriate to inform the Local Plan?

2.6 Appendix A identifies a broad range of evidence documents to be relied upon by the Council in formulating the Local Plan.

2.7 Concern is raised that the following documents, which were referenced in the Spatial Housing Strategy consultation document are no longer listed:

- Greater Birmingham HMA Strategic Growth Study.
- Strategic Housing & Employment Land Availability Assessment

2.8 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 Local Plan EiP and provides justification for the Council's intended contribution of 4,000 homes to assist in meeting the shortfall.

2.9 The Strategic Housing & Employment Land Availability Assessment (SHELAA) establishes the broad range of site options to be tested by the Council in determining the appropriate housing and employment allocations necessary to meet identified needs.

2.10 In addition, it is considered the Self Build & Custom Build Register should be identified as part of the evidence base to inform emerging policies in respect of housing needs and mix.

Question 2: Do you agree that the correct infrastructure to be delivered alongside proposed site allocations has been identified in the IDP?

- 2.11 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.
- 2.12 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 2021 (IDP):
- Facilitate the delivery of a new 2FE First School to serve Bilbrook/Codsall;
 - Opportunity to deliver additional retail provision to serve new residents and the wider local community;
 - Enhancements to the Green Infrastructure Network including the provision of new publicly accessible open space and measures to ensure achievement of biodiversity net gain.
- 2.13 In addition, the emerging proposal would also deliver the following further infrastructure benefits:
- Provision of a new road link between Lane Green Road and Pendeford Mill Lane, potentially easing congestion within Bilbrook village;
 - Improvements to Pendeford Mill Lane including the creation of a new gateway for Bilbrook; and
 - Provision of pedestrian and cycle paths to link with existing infrastructure.
- 2.14 The IDP identifies the correct infrastructure projects to support the proposed spatial development strategy based upon the evidence currently published. Bloor Homes recognises that the IDP is a living document and further evidence planned for publication may influence site specific infrastructure requirements.
- 2.15 Bloor Homes is therefore committed to engaging with the District Council, Parish Council and service providers to explore infrastructure requirements to inform future iterations of the Infrastructure Delivery Plan and the emerging proposal for Land East of Bilbrook.

Question 3a: Have the correct vision and strategic objectives been identified?

- 2.16 The Vision is clear and succinct, however as presently drafted it doesn't appear locally relevant and contains no spatially specific elements.

2.17 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.

Question 3b: Do you agree that the draft policies and policy directions will deliver these objectives?

2.18 Bloor Homes considers the draft and emerging policies will assist in delivering these objectives.

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 refinement of this option.

Question 4: Do you support the policy approach in Policy DS1 – Green Belt and Policy DS2 – Open Countryside?

3.2 In terms of the strategic approach to the Green Belt there is an acceptance 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 Exceptional circumstances exist for Green Belt release in Bilbrook to allow for development within the plan period and beyond. Accordingly, the exceptional circumstances that warrant the further release of Green Belt land at Bilbrook include:

- It would allow for the necessary growth in Bilbrook in respect to market and affordable housing to meet local housing needs and control localised affordability issues;
- It would provide an opportunity to promote sustainable patterns of growth in line with the settlement hierarchy;
- The only realistic means of achieving further proportionate growth in Bilbrook is through the release of Green Belt land.; and
- Proportionate growth would assist in supporting existing and proposed services and facilities and deliver new and improved infrastructure in line with community aspirations.

3.4 Consideration does however need to be given to the permanence of the Green Belt beyond the current plan period.

3.5 Paragraph 140 of the NPPF states:

“Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries,

having regard to their intended permanence in the long term, so they can endure beyond the plan period."

- 3.6 The consultation document 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.
- 3.7 The proposed spatial development strategy for the period to 2038 can demonstrate exceptional circumstances for the release of Green Belt to deliver sustainable growth to 2038 and, in light of the District Green Belt constraints, further Green Belt release will be required beyond 2038 to meet future development requirements, even if such requirements only relate to meeting local housing needs.
- 3.8 The Site Allocations Document identified a number of safeguarded land sites to meet longer term growth requirements and this Local Plan review should take a similar approach to ensure Green Belt boundaries endure well beyond the plan period.

Question 5: Do you support the policy approach in Policy DS3 – The Spatial Strategy to 2038?

- 3.9 Bloor Homes generally supports the policy approach set out in Policy DS3 – The Spatial Strategy to 2038, however further commentary is set out below in respect of different elements of the spatial strategy for housing.

Local Housing Need

- 3.10 The Strategic Housing Market Assessment (SHMA) sets out a minimum housing requirement of 254 dpa based on the Government's standard method. 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.
- 3.11 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;”*

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

3.13 These circumstances are considered in further detail below.

Unmet Need from Neighbouring Authorities

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

3.15 The Birmingham City shortfall was tested through the BDP EiP and an unmet housing need to 2031 of 37,900 homes was confirmed.

3.16 The Black Country LPAs are currently undertaking a review of the Black Country Plan which is aligned to the timescales of the South Staffordshire Local Plan review. Evidence that has 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.

3.17 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.

3.18 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.

3.19 Bloor Homes supports the Council’s 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 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, highlighting that the working age population will increase by 3,489 people between 2018 and 2038, which represents growth of 5.4%. If the current job density is maintained in 2038 it is anticipated that an extra 1,989 new jobs will be required to support the uplift in the working age population. Jobs growth would need to rise to 2,826 to support an increased job density in line with the wider West Midlands region.
- 3.21 The number of jobs likely to be created within South Staffordshire is likely to significantly exceed the 2,826 required to support the West Midlands regional job density by virtue of committed development at the West Midlands Interchange (WMI) which in 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. In addition, significant jobs growth will be provided through committed strategic employment developments planned at i54 and ROF Featherstone.
- 3.22 At present the SHMA fails to consider 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. This balance is important to ensure sustainable commuting patterns and reduce in-commuting from the Black Country.
- 3.23 Further evidence is considered 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.

Settlement Hierarchy

- 3.24 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

- 3.25 Bloor Homes supports the proportionate distribution of housing growth across the villoges, with the most sustainable villoges to deliver a higher amount of growth.
- 3.26 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 employment site at i54. These elements of the District are also far more connected to major road and rail infrastructure.
- 3.27 Allowing growth in the Tier 1 and Tier 2 settlements provides an opportunity to meet locally arising housing needs and offers opportunity to deliver new services, facilities and infrastructure that would assist in addressing local issues and provide community benefit for residents, including the provision of a new First School in Codsall/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 the top tier sustainable villoges and locations close to the Black Country conurbation.
- 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.

Question 6: Do you support the policy approach in Policy DS4 – Longer Term Growth Aspirations for a New Settlement?

- 3.30 Bloor Homes notes Policy DS4, which recognises the Council's aspiration to explore the potential for a sustainable, independent new settlement.
- 3.31 Policy DS4 recognises that such an option would not contribute to housing growth during the proposed plan period to 2038 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 deliver and would need to be delivered alongside infrastructure on a scale much larger than a usual development
- 3.32 Support for a new settlement in the longer term should not be at the expense of supporting growth in the sustainable settlements beyond the plan period. As

discussed previously, safeguarded land should be identified within this Local Plan to provide permanence to the Green Belt boundary and to support longer term growth requirements. This balanced approach would allow for longer term growth to meet longer term needs within the villages alongside strategic growth within a new settlement.

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 and should be read in conjunction with other representations submitted in respect of the proposed allocations.

Question 7a: Do you support the proposed strategic housing allocations in policies SA1-SA4?

4.2 Bloor Homes supports the proposed identification of strategic housing allocations and has land interests in the strategic housing allocations to the East of Bilbrook and the North of Penkridge (alongside other interests in various locations across South Staffordshire not currently proposed as allocations).

4.3 In respect of Land East of Bilbrook, the amalgamation of both safeguarded land sites (Ref: 443 & 209) and the balance of Bloor Homes' land holdings into a larger proposed strategic housing allocation, provides an opportunity to deliver approximately 950 dwellings alongside new infrastructure as identified in Policy SA1. The key infrastructure and design requirements set out in Policy SA1, as drafted, are supported by Bloor Homes.

4.4 Bloor Homes' land interests extend to the whole proposed East of Bilbrook allocation providing confidence that a comprehensive and co-ordinated approach to development can be achieved in its delivery.

4.5 In light of the above, Bloor Homes does not consider it necessary to require a Land East of Bilbrook SPD as a vehicle for establishing site requirements and an assessment framework. Policy SA1, as currently drafted, requires the preparation of a masterplan and design code which are both supported by Bloor Homes. These documents 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 should result in a robust Infrastructure Delivery Plan (IDP) with the identification of infrastructure requirements, costs and phasing of delivery. Given the above, it is unclear what additional detail to guide the design and delivery of the allocation would be contained in an SPD.

4.6 The preparation of site specific SPDs, as vehicles for setting out further guidance, has the potential to delay delivery of strategic housing allocations, with no guarantees of an adoption date beyond adoption of a new Local Plan. Instead, the Council should include a requirement to the strategic allocation policies for a masterplan to be agreed prior to the submission of a planning application. This provides greater flexibility as to when the site can deliver and no dependence on the adoption of an SPD (where there is no binding deadline for adoption)

4.7 Bloor Homes can demonstrate the site is available, suitable and viable, with further information provided within Chapter 6 of this representation.

Question 7b: Do you agreed that given the scale of the 4 sites detailed in policies SA1-SA4, these warrant their own policy to set the vision for the site, alongside a requirement for a detailed masterplan and design code?

4.8 Bloor Homes recognises the importance of the four proposed strategic housing allocations in delivering the spatial strategy for the District to 2038. 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. As stated above, this negates the need for an additional SPD relating to the design and delivery of this site.

4.9 The key infrastructure and design requirements are helpful in informing the masterplan and design code.

Question 8: Do you support the proposed housing allocations in Policy SA5?

4.10 This representation relates to Land East of Bilbrook. Further comments in respect of the proposed housing allocations contained in Policy SA5 are set out in other representations submitted on behalf of Bloor Homes.

5. Development Management Policies

5.1 Bloor Homes notes that this consultation document only outlines a general policy approach to non-strategic policies at this stage. Further considered comments can be provided once development policies are fully drafted.

5.2 Therefore, the following comments are intended to provide a helpful steer in drafting the proposed policies.

Question 11: Do you agree with the proposed policy approaches set out in Chapter 6?

5.3 Bloor Homes would wish to raise a general concern that the direction for travel for a number of policies relating to major residential schemes are overly prescriptive and have no regard to the context of a site within a wider settlement or any site specific constraints and opportunities. For example, the policy directions seek to prescribe a specific District wide density, detailed housing mix requiring at least 75% of proposed dwellings to be three bedrooms or less, and within this mix it is expected that properties will comply with NDSS, 30% will be required to meet M4(2) standard and potentially there will be a need to deliver an additional specific percentage as bungalows. In addition, the POS requirement requires all schemes of 33 dwellings or above to incorporate centrally located public open space where equipped play is provided as default. This prescriptive approach is in danger of stifling innovation, undermining high quality design and resulting in a large number of identikit housing proposals that lack and variety in housing provision or reflect/create local identity.

HC1 – Housing Mix

5.4 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. It also needs to reflect demand, which is often very different to need, where households seek flexibility to grow a family without having to trade up or additional space to work from home.

5.5 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.

5.6 Bloor Homes would wish to raise concerns that the proposed direction of travel appears overly prescriptive with all market housing proposals to include 75% of

properties to comprise three bedrooms or less and a further specific breakdown to be applied on a site-specific basis. This does not 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

- 5.7 Bloor Homes supports the efficient use of land, in accordance with National Planning Policy and Guidance, however, the introduction of a District-wide minimum density standard is not supported. Instead, it is necessary for sites to be considered on a site-by-site basis, having regard to the prevailing housing market conditions, local character, context and other planning policy requirements or environmental designations or constraints.
- 5.8 It should be noted that the housing mix requirements will influence density recognising that bungalow provision and adaptable and flexible housetypes will have greater land take.
- 5.9 In accordance with national guidance the Council may wish to consider a variety of density standards for different locations.
- 5.10 Nevertheless, 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 density and would be reflective of the character of surrounding development, including committed development currently under construction on SAD443, within the current housing allocation.

HC3 – Affordable Housing

- 5.11 Bloor Homes notes that for all major developments 30% of all homes are to be delivered as affordable housing. This appears to be supported by the Viability Study which determines the current affordable housing requirement of 40% affordable provision is very unlikely to prove supportable on larger schemes with significant infrastructure costs. The Viability Study confirms 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.
- 5.12 It is recognised that a Stage 2 Viability Assessment will be undertaken once more refined and bespoke assumptions regarding infrastructure and development costs are known. It is understood that the Infrastructure Delivery

Plan will continue to be evolved and refined as the Local Plan review progresses.

- 5.13 Bloor Homes considers it is essential for affordable housing delivery targets to be tested alongside all other policy requirements and burdens to ensure that the total cumulative cost of all relevant policies do not undermine the deliverability of the Local Plan.
- 5.14 Bloor Homes would welcome the opportunity to engage with the Council and the appointed viability consultants prior to the publication of the Stage 2 Assessment.

HC4 – Homes for Older People

- 5.15 The proposed direction of travel requires major residential development to make a clear contribution to meeting the needs of the District's ageing population. 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.
- 5.16 It is considered that a specific requirement for bungalows is not appropriate if instead the Council pursues a policy of requiring 30% 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.”

- 5.17 The Strategic Housing Market Assessment 2021 (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.
- 5.18 The HMA 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. If the Government had intended that evidence of an ageing population alone justified adoption of optional standards, then such standards would have been incorporated as mandatory in the Building Regulations, which is not the case.

5.19 The SHMA identifies a need for 1,793 accessible and adaptable general homes for those over 65 and 1,235 for those under 65 to 2038. This equates to less than 30% of the planned housing supply to 2038. Bloor Homes considers that whilst there may be justification for implementing optional M4(2) standards, the 30% requirement set out is excessive and not justified, especially where this could be in addition to other requirements set out for bungalow provision.

HC7 – Self & Custom Build Housing

5.20 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.

5.21 The SHMA identifies 15 applicants on the self-build register as of December 2019, recognising that 3 of these applicants are also on a register within another LPA. This demonstrates a very low level of demand. Additionally, the self-build register only needs to include the name and address of the lead contact and the number of serviced plots of land they are seeking to acquire- no information is requested on the financial resources. ‘Demand’ could be an expression of interest rather than actual demand.

5.22 The policy direction does not suggest a specific percentage of self and custom build homes will be required on allocated sites, instead ‘encouraging’ the provision of serviced plots for self-build and custom housebuilding as part of an appropriate mix of dwellings on all major developments. Bloor Homes considers this to be a proportionate response to the evidence that has been published.

5.23 If custom and self-build requirements are to be set out in policy, there needs to be a mechanism identified to allow for such plots to come forward for market housing if demand is not present. For example, if serviced plots for self-build and custom housebuilding have been made available and marketed for 12 months and have not sold, plots can be used for delivery of general market housing.

5.24 Practical difficulties of facilitating self and custom-build plots on larger sites should also be recognised, creating issues with health and safety and the need for independent construction access point.

- 5.25 In light of the above, if demand does increase, it would be preferable for small sites to be identified which are more suitable for self and custom build plots.

HC9 – Design Requirements

- 5.26 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.
- 5.27 Development management policies, which are intended to guide the determination of planning applications should be established through policy with requirements on design quality set out in sufficient detail without relying on other criteria or guidelines set out in an SPD which has not been subject to examination.

HC11 – Space about Dwellings & Internal Space Standards

- 5.28 Bloor Homes has limited comment in respect of the space about dwellings standards currently utilised by the District Council which are generally considered appropriate.
- 5.29 However, if bungalows are to be provided within a scheme, it would seem logical to reduce 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. At present reduced garden requirements only relate to 1 bed specialist housing rather than single storey general housing in the adopted standards.
- 5.30 Bloor Homes wish to object to the internal floorspace policy direction.
- 5.31 The Nationally Described Space Standards (NDSS) were published by the Department of Communities and Local Government on 27 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 25th March 2015.
- 5.32 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."

- 5.33 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."

- 5.34 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."

- 5.35 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."

- 5.36 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.

- 5.37 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.”

5.38 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.

5.39 The South Staffordshire Housing Market Assessment provides limited commentary in respect of NDSS. The focus of this commentary, contained within the Accessible and Adaptable Housing section on page 90 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.

5.40 It is clear 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 2018-38.

HC12 - Parking Standards

5.41 Bloor Homes supports the existing parking standards contained within the Core Strategy.

5.42 In addition, Bloor Homes supports the requirement to provide electric vehicle charging infrastructure. The Council will need to review the need for a

planning policy in relation to EV charging points given that this is due to be dealt with in the Building Regulations.

HC14 – Health Infrastructure

- 5.43 Bloor Homes recognises the need for development to address unacceptable impact on health infrastructure. It is recommended that engagement with the CCG informs further refinement of the Infrastructure Delivery Plan as part of the Local Plan review process.

HC15 – Education

- 5.44 Bloor Homes supports the proposed direction of travel in respect of education infrastructure which appears to represent a continuation of the current approach.
- 5.45 It should be noted the Land East of Bilbrook is proposing to deliver a new First School to serve Bilbrook and Codsall...
- 5.46 It is recommended that engagement with SCC Education informs further refinement of the Infrastructure Delivery Plan as part of the Local Plan review process.

HC17 – Open Space

- 5.47 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 to the existing standard of 0.01ha.
- 5.48 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. In addition, the requirement for open space to be centrally located may not be appropriate when considering on-site constraints and the location of existing open space in the vicinity.
- 5.49 It is recommended that distance isochrones are identified within the policy for different open space typologies such as LEAPs and LAPs to ensure open space infrastructure has regard to the needs of the wider settlement.

HC18 – Sports Facilities & Playing Pitches

- 5.50 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.
- 5.51 It is recommended that engagement with Sport England and sports clubs/sporting bodies informs further refinement of the Infrastructure Delivery Plan as part of the Local Plan review process.

HC19 – Wider Green Infrastructure Design Principles

- 5.52 Bloor Homes supports the provision of multi-functional greenspace as part of strategic developments.

EC3 – Inclusive Growth

- 5.53 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.
- 5.54 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.

5.55 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 to cover an operating area stretching from Oakham to Shrewsbury on an east-west axis and from Nottingham to Stratford upon Avon on a north-south axis

5.56 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.

NB2 – Biodiversity

5.57 The intention of Policy NB2 is recognised by Bloor Homes. However, Government policy and guidance are not yet requiring a 10% Biodiversity Net Gain, with the NPPF instead stating only that development should ‘provide net gains of biodiversity.’ Policy wording should instead seek biodiversity net gains in line with the Government’s latest legislation, policy or guidance. Bloor Homes is also aware that it is the Government’s intention to introduce exemptions applicable to the most constrained types of development which will be set out in secondary legislation and as such flexibility should be provided and a specific target, if included, should not relate to ‘all development.’

NB3 – Cannock Chase SAC

5.58 Bloor Homes notes further evidence in respect of Cannock Chase SAC, including a review of mitigation measures and visitor survey, is due to be

published in 2022. This evidence should inform the policy approach to addressing any impact arising from development on Cannock Chase SAC and determine whether on-site mitigation will be effective in addressing such impact.

NB6 – Energy & Water Efficiency & Renewable Energy

- 5.59 Bloor Homes supports the direction of travel in respect of carbon reduction and consider that planning has an important role in the delivery of new renewable and low carbon energy infrastructure. However, policies should ensure that they follow nationally consistent set of standards/timetables and are implementable. Bloor Homes considers the success of achieving a low carbon future is by standardisation rather than individual council's specifying their own policy approach to energy efficiency.
- 5.60 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 CO² when compared to current standards. Further changes are due in 2025 that will mean a 75% reduction in CO² when compared to today, along with a new focus on rating primary energy efficiency as well as CO².
- 5.61 Bloor Homes already applies a 'fabric first' approach in their house type design. The fabric first approach has a number of clear benefits, notably that it is built into the property for its whole life ensuring that every occupier will benefit from a reduced electricity bill and it reduces CO² emissions.

Question 12a: It is proposed that the fully drafted policies in this document (Policies DS1-DS4 and SA1-SA7) are all strategic policies required by paragraph 21 of the NPPF. Do you agree that these are strategic policies?

- 5.62 Bloor Homes agrees that the policies outlined above represent strategic policies.

Question 12b: Are there any other proposed policies in Chapter 6 that you consider should be identified as strategic policies?

- 5.63 Final drafted policy wording would be required to determine whether a policy is strategic.

6. Land East of Bilbrook

6.1 This Chapter sets out a brief description of the site, followed by an assessment of the site against each of the Council's site selection criteria, as defined within the Housing Site Selection Topic Paper.

Site Description

6.2 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**).

6.3 The site comprises a number of field parcels and several agricultural buildings, located off Pendeford Mill Lane.

6.4 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.

6.5 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.

6.6 This proposed strategic development allocation represents a logical and sustainable urban extension to the Tier 1 settlement of Bilbrook, providing an opportunity for delivering approximately 950 additional new homes with associated supporting infrastructure, including the provision of a new first school, a new local centre and a new link road between Lane Green Road and Pendeford Mill Lane...

6.7 An illustrative masterplan has been prepared by e*SPACE Urbanists and is included within a promotional document at **Appendix 2** to this representation.

6.8 The illustrative masterplan identifies the following key design principles:

- Provision of approximately 950 homes;
- Provision of a first school (capable of expansion to 2FE) and local centre to western edge of site, to integrate with existing settlement;

- Provision of approximately 15 hectares of green infrastructure, evenly distributed throughout the site, including provision of a central green and LEAPs;
- Provision of SuDS;
- 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.

6.9 A promotional document has been prepared by e*SCAPE Urbanists which provides further detail in respect of the site and is included at **Appendix 2** to this Representation.

Sustainability Appraisal (SA) Findings

- 6.10 The Council's Preferred Options Sustainability Appraisal (2021) provides an assessment of sites both pre and post mitigation and provides assessment of reasonable alternatives against the SA Objectives.
- 6.11 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.
- 6.12 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 Wodbaston 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.
- 6.13 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.

6.14 The site also benefits from good access to further services and facilities located within the wider urban area, including Wolverhampton.

6.15 The site is therefore sustainably located.

Sequential Test

6.16 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.

6.17 It should be noted the Housing Site Selection Paper erroneously refers to site 213, however this does not affect the outcome of the assessment.

Green Belt Harm

6.18 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.

6.19 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."

6.20 The conclusion that the release of this site would constitute a limited weakening of the Green Belt is supported by Bloor Homes.

6.21 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.

Landscape Sensitivity

- 6.22 South Staffordshire District Council's Landscape Study (2019) finds that the site has 'moderate' sensitivity in landscape terms.
- 6.23 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.
- 6.24 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.
- 6.25 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.

- 6.26 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.
- 6.27 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.
- 6.28 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

- 6.29 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.
- 6.30 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.
- 6.31 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

- 6.32 The site lies within Flood Zone 1 which has the lowest probability of flooding.
- 6.33 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)

- 6.34 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.
- 6.35 Potential exists to provide additional access points into the site from the west off Lane Green Road and from the east off Barnhurst Lane.
- 6.36 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.

Impact on Current Land Use

- 6.37 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.
- 6.38 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

- 6.39 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.
- 6.40 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.

- 6.41 There are no non-statutory designated sites within or immediately adjacent to the site.
- 6.42 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.
- 6.43 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.
- 6.44 A full ecological survey can be undertaken upon request to determine the presence or absence of notable species.
- 6.45 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).
- 6.46 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

- 6.47 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.
- 6.48 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

- 6.49 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 future project.

- 6.50 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.
- 6.51 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.
- 6.52 This represents a significant benefit of allocating Land East of Bilbrook, for residential development.

Suitability

- 6.53 The information set out above, read in conjunction with the appended illustrative masterplan and promotional document, demonstrates that Land East of Bilbrook is a suitable site.

Deliverability

- 6.54 There are agreements in place between the landowners and Bloor Homes to facilitate the development of the site.
- 6.55 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 2038. The site is available now.
- 6.56 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 commenced construction of 164 homes accessed off Pendeford Mill Lane which would represent the first phase of the wider Land East of Bilbrook proposal.

7. Conclusion

- 7.1 This representation is made by Evolve Planning on behalf of Bloor Homes to the South Staffordshire Local Plan Review, Preferred Options (Regulation 18) consultation. This representation relates to land east of Bilbrook, a preferred strategic development location, which Bloor Homes is promoting for residential-led development.
- 7.2 Bloor Homes supports the Council's proposed spatial development strategy, which includes the proposed strategic allocation to the east of Bilbrook, which represents a refinement of Option G identified through the Strategic Housing Strategy and Infrastructure Delivery consultation published in 2019. Bloor Homes considers that this option not only assists in providing improved infrastructure but also has due regard to where housing needs exist, including within the top tier sustainable villages and locations close to the Black Country conurbation. Allowing growth in the Tier 1 and Tier 2 settlements provides an opportunity to meet locally arising housing needs and offers opportunity to deliver new services, facilities and infrastructure that would assist in addressing local issues and provide community benefit for residents, including the provision of a new First School in Codsall/Bilbrook.
- 7.3 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 evidenced unmet needs arising from the wider GBBCHMA.
- 7.4 Bloor Homes has raised a number of concerns in respect of the direction of travel for a number of development management policies and considers it is essential for affordable housing delivery targets to be tested alongside all other policy requirements and burdens to ensure that the total cumulative cost of all relevant policies do not undermine the deliverability of the Local Plan.
- 7.5 The information contained within this representation, read in conjunction with the appended illustrative masterplan, demonstrates that land east of Bilbrook is a suitable and deliverable site for residential development, subject to its release from the Green Belt.
- 7.6 There are no existing uses that would require relocation and no issues of contamination that would require remediation. Many of the potential impacts of the development of the site can be mitigated through design and in many cases a positive outcome can be achieved.

7.7 It is therefore submitted that Land East of Bilbrook represents a sound strategic housing allocation.

APPENDIX 1

Site Location Plan

Recreation Ground

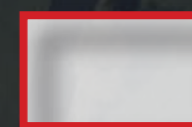
Bilbrook

Recreation Ground

Pendeford Bridge

Key

Site Boundary



Pendeford Mill Lane

Shropshire Union Canal

Balliol Business Park

Barnhurst Lane

Lane Green

Lane Green Barns

Lane Green Road

Lane Green Farm

Bilbrook Bridge

Football Ground

Codball Road

Dam Mill

0m 20m 40m 60m 80m 100m
 Scale 1:2,500 (@A2)
 Ordnance Survey © Crown copyright 2018.
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APPENDIX 2

Promotional Document

Land at East of Bilbrook Development Framework

December 2019



e*SCAPE
u r b a n i s t s

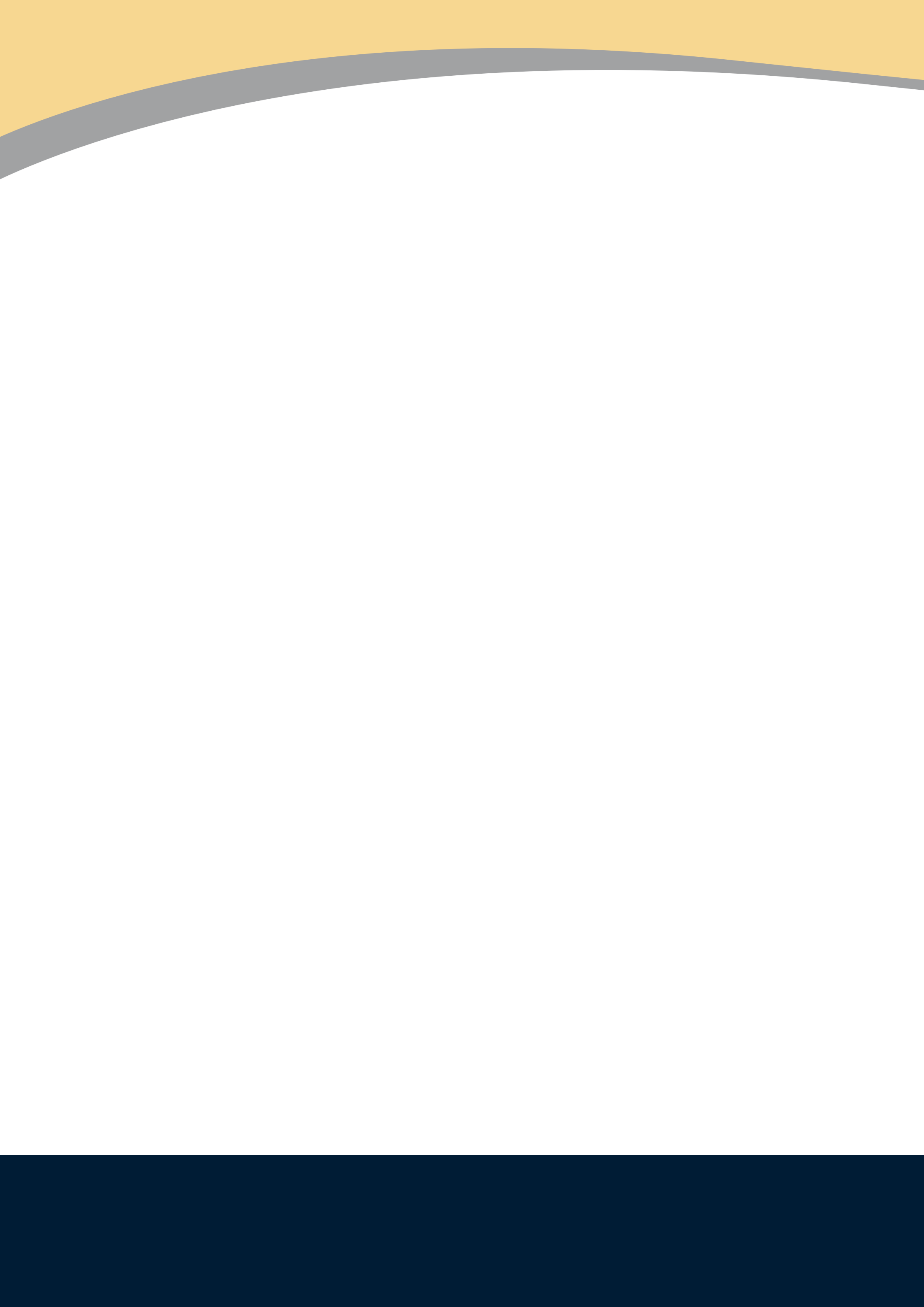
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Group 


pgla
LANDSCAPE ARCHITECTURE

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1.0 Introduction



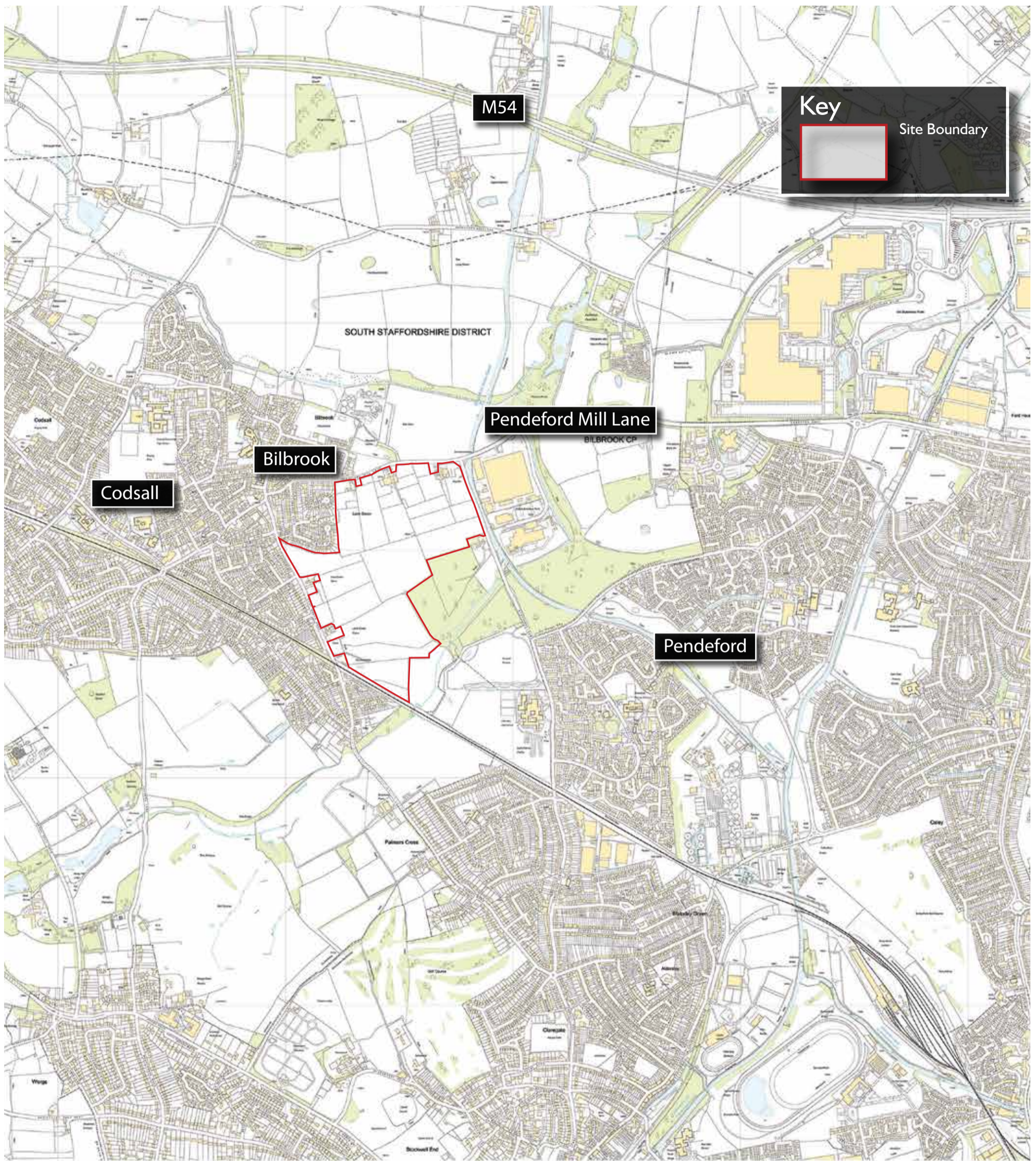


Figure 01:01 Site Location

Purpose

- 1.1 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. The site has partly been identified by South Staffordshire District Council as a potential candidate to be released from the Green Belt to help meet the local housing needs of the District.
- 1.2 The purpose of this document is to explain why the site represents a suitable and deliverable opportunity to accommodate much-needed new housing in Bilbrook in a sensitive way. The document provides a framework for residential-led development at the site, responding to the Council's current consultation on the need for additional housing in South Staffordshire and on the land that may be available to accommodate it.
- 1.3 Bloor Homes looks forward to continuing a constructive dialogue with South Staffordshire District Council, leading to the identification of the land for housing in the Local Plan, and is committed to promoting the opportunity through future stages of the Local Plan and the related examination, as necessary.
- 1.4 This development framework demonstrates that the site is sustainably located for accommodating new housing development, being located directly adjacent to the existing urban edge of Bilbrook. We are not aware of any physical, environmental, ecological or other constraints preventing the site coming forward for housing.

The Site

- 1.5 The site extends to approximately 46.9ha 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.
- 1.6 The north western part of the site has now been granted full planning permission for 164 homes on land accessed off Pendeford Mill Lane.
- 1.7 The site encompasses several smaller parcels of land that are identified through the adopted Site Allocations Document as either a housing allocation (ref: 443), which has recently received full planning permission as stated above, or safeguarded land (ref: 443 and 209). The remainder of the site is located within the West Midlands Green Belt.
- 1.8 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.

Headline Benefits

- 1.9 Key benefits of the proposed scheme include the delivery of:
 - Approximately 1,100 market and affordable homes with a range of housing sizes and tenures to help meet the demand for new housing in the area;
 - New areas of public open space for use by new and existing residents;
 - Retention of existing natural assets which make up the site's green infrastructure network and integrating these within the landscape strategy for the site;
 - Provision of a new link road between Lane Green Road and Pendeford Mill Lane, to relieve congestion in Bilbrook; and
 - Provision of a new Local Centre and First School.





2.0 Being Part of Bilbrook

2.0 Being Part of Bilbrook

A New Sustainable Neighbourhood

- 2.1 Bloor Homes wishes to work closely with the Council and other key stakeholders, including the local community, in order to deliver a comprehensively planned development of the highest quality at its site at Bilbrook.
- 2.2 The development of this site will create a new extension to the village, comprising a mix of housing types, sizes and tenures, supported by a new local centre and first school. This will be a sustainable development with an emphasis on protecting natural assets, promoting biodiversity and encouraging travel within the site by non-car modes.
- 2.3 The development will be sympathetically designed to respect and amenity, outlook and privacy of existing properties adjoining and overlooking the site. The development will present attractive green edges to surrounding streets with houses set back from road boundaries to allow for new soft landscaping and the retention of existing trees and hedgerows.
- 2.4 This will be an integrated and permeable development, well connected with the surrounding neighbourhood with multiple vehicular and pedestrian access points into the site and a new link road connecting Lane Green Road and Barnhurst Lane.
- 2.5 Defining qualities will be a rich green landscape setting, distinctive tree lined avenues, vibrant local centre and eye catching houses.
- 2.6 Existing natural assets which make up the site's green infrastructure network such as trees and hedgerows will be retained and integrated into the development where possible. A network of green corridors will provide a strong landscape setting and will provide movement corridors for wildlife and pedestrians.
- 2.7 The masterplanning team has carefully considered all the opportunities and constraints to inform this development framework, which demonstrates that the site can comfortably accommodate a sustainable neighbourhood of around 1,100 dwellings.

Our Vision for the Site

- 2.8 Our Vision for the site is presented in the panel opposite. The Vision has emerged from a full appreciation of the surrounding context and unique challenges and opportunities presented by the site and responds to the needs and aspirations of local residents for new high quality housing and community facilities in Bilbrook.

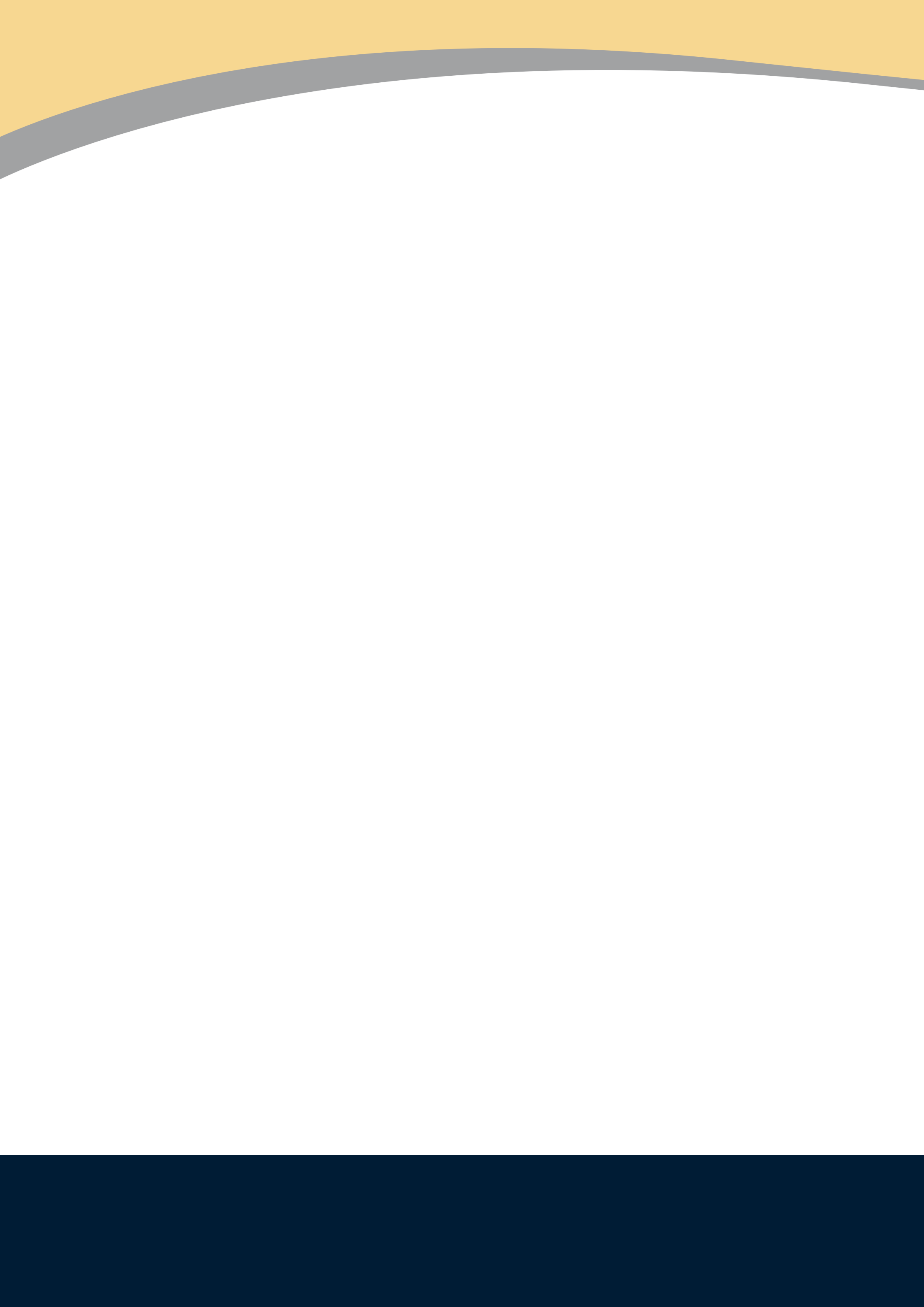
“The site offers the opportunity to create a high quality residential-led development in a sustainable location close to existing services and amenities and with good access by road and public transport. The development will provide a mix of housing types and tenure to cater for local needs.

This will be a high quality development that reflects and reinforces the existing residential character of Bilbrook. It will be characterised by attractive streets, public open spaces, eye catching houses and high quality hard and soft landscaping. New housing will be sympathetic to the existing character of the local area, being of an appropriate scale, density and appearance.

The development will be carefully designed to minimise any potential effects on character of the surrounding landscape and visual amenity of existing properties. This will be achieved by retaining existing on-site vegetation, creating appropriate landscape buffers and by the siting, layout and density of development within the site.”



Figure 02:01 Site Boundary



3.0 Working with the Site

3.0 Working with the Site

Introduction

- 3.1 This site already has a strong Green Infrastructure network within it, therefore a sympathetic and light touch approach to development is required, working with the grain of the existing landscape.
- 3.2 e*SCAPE follow the principles of 'landscaped' masterplanning, whereby the existing site features, topography and general flow of the landscape and surrounding context govern the form and scale of the development. Indeed this approach is as much grounded in 'New Urbanism' as any other approach. New Urbanism in itself calls on a rediscovery of walkable neighbourhoods and the priority of walking, cycling and public modes of transport over private motor vehicles. The approach thus allows streets to be taken back by communities as social spaces, as opposed to domination by the car.
- 3.3 Such an approach works with the grain of the villagescape and landscape in which it sits, creates a place which has a varied mix and density of housing and places homes within a green environment. The following paragraphs provide the material to aid our understanding, of the site and it's surroundings.



Appreciating the Physical Context

- 3.4 In demonstrating that the site represents an appropriate and logical location for development, Bloor Homes is also seeking to understand how the site interacts with the village, surrounding settlements and countryside, so that future development can be integrated into the villagescape and landscape setting. This initial appreciation of these various levels of context which include both the wider area and site, is set out below.

Regional/Sub-Regional Context

- 3.5 As illustrated in Figures 03:01, the site is sustainably located on the eastern edge of Bilbrook, a main service village in South Staffordshire District.
- 3.6 The site is located approximately 700m to the north-west of the West Midlands conurbation and in close proximity to a wide range of employment opportunities, including the nearby i54 technology-based business park. The site is well connected, with convenient access to the motorway network via the M54 which provides access to Telford (approximately 20km to the west) and Bloxwich, Walsall and Birmingham to the east (via the M6).
- 3.7 Pendeford Mill Lane runs east towards A449. The A449 is a major road which runs south towards Wolverhampton (circa 5km south of the site) and north towards the M54 (circa 2km from the site).

Local Context

- 3.8 Figure 03:02 below illustrates the site's sustainability in terms of its access to local facilities and services.
- 3.9 Bilbrook has a first school (Lane Green), a middle school (Bilbrook Middle), a church (Holy Cross) and Village Hall. The village centre is within easy walking distance of the site (approximately 300m to the west) and supports a range of facilities and services including a public house (The Woodman Inn), convenience store (One Stop Shop), pharmacy, and bank (Barclays).
- 3.10 Additional facilities can be found within the nearby village of Codsall. Codsall supports a range of small scale retail and service outlets including a number cafes, restaurants, clothing shops, takeaways and public houses. It also supports a Post Office, butchers and a bank (Nationwide). The nearest large supermarket is a Morrisons store in Pendeford, approximately 2km to the east.
- 3.11 The site is well served by public transport. The nearest bus stops are located along Duck Lane, approximately 400m walking distance to the east in the village centre. The stops are served by three services (5a, 10B, 784) operated by National Express West Midlands which connect Bilbrook with surrounding towns and villages including Codsall, Perton and Wolverhampton. Services 5 and 5A run every 15 mins between Wolverhampton and Codsall Monday - Saturday daytimes.

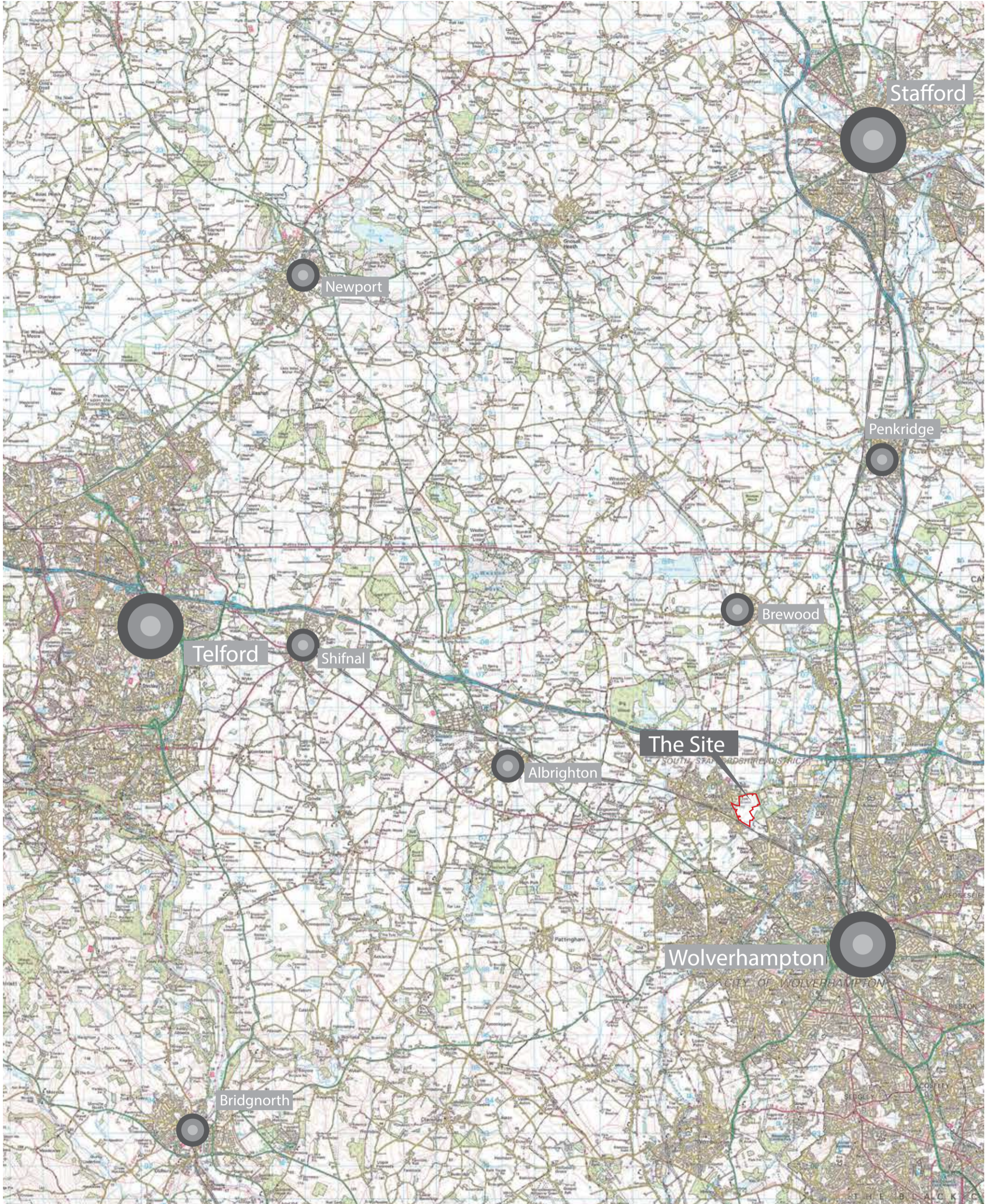


Figure 03:01 Sub-Regional Context

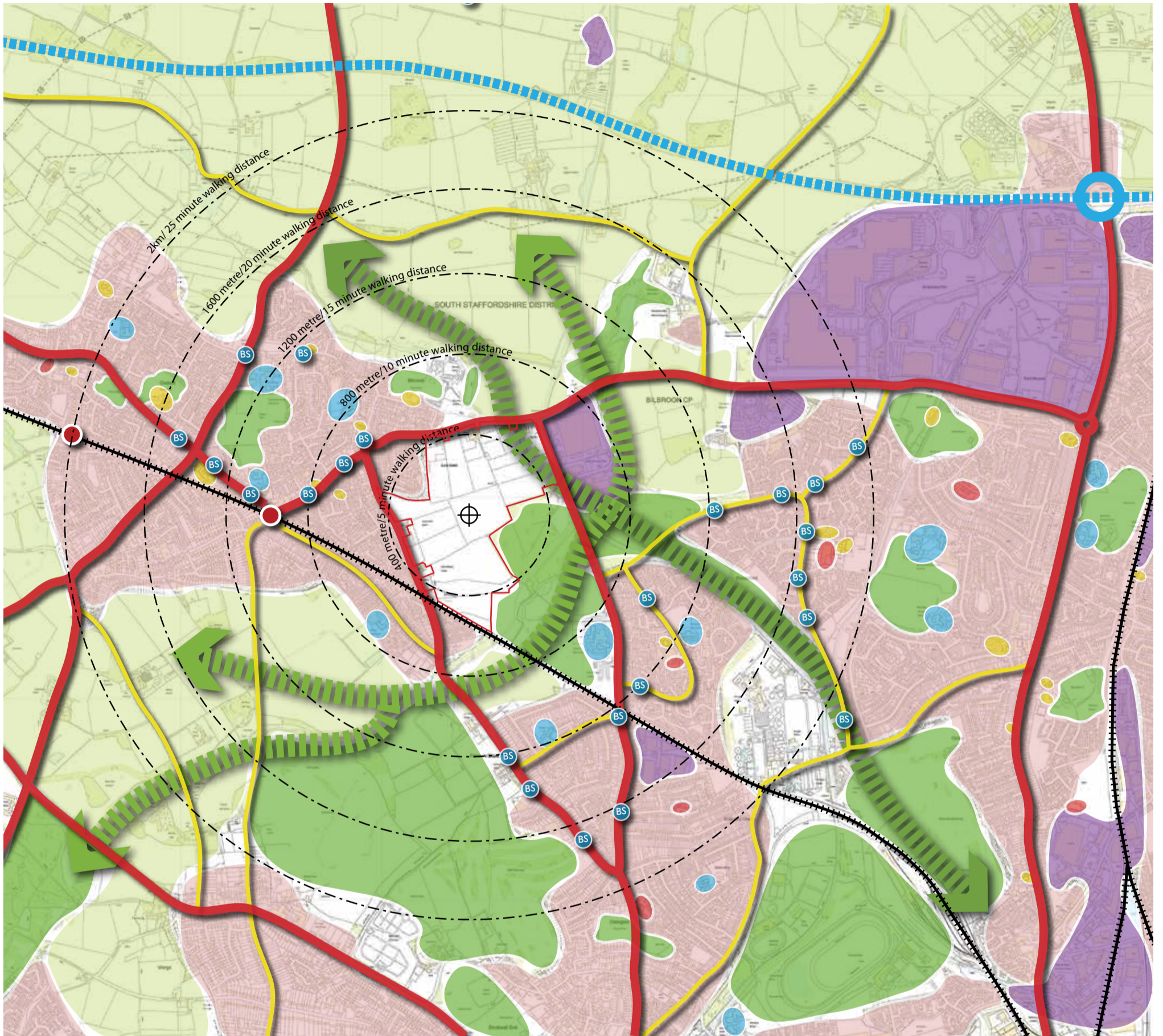


Figure 03:02 Local Context

- 3.12 The nearest train station is at Bilbrook, less than 1km south-west of the site. Bilbrook is typically served Monday to Saturday by one train per hour in each direction between Birmingham New Street and Shrewsbury via Wolverhampton. These services are operated by West Midlands Trains with some extra trains at peak times on weekdays. There are fewer trains on Sundays (every two hours each way) and all Sunday services are operated by Transport for Wales. These mostly run between Wolverhampton & Shrewsbury only.
- 3.13 The site is well connected to the local and national road network. Pendeford Mill Lane runs across the site's northern boundary and provides access to Coldsall in the west and Pendeford in the east. It joins Stafford Road approximately 3km to the east from where access to the M54 Motorway can be gained via Junction 2. The A41 lies less than 3km to the south and provides access to Wolverhampton.
- 3.14 A range of outdoor leisure/recreational opportunities can be found locally including two large golf courses to the south. There is a small recreation ground directly opposite the site on the north side of Pendeford Mill Lane which includes a skateboard facility and marked football pitches. The Shropshire Union Canal runs to the east of Barnhurst Lane and is within easy walking distance of the entire site. Pendeford Mill Lane Allotments are located less than 100m away.

Site Constraints & Opportunities

Introduction

- 3.15 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 in Figure 03:03 below. A summary of that work which has informed the formulation of the development framework is provided below.
- 3.16 In summary, no technical barriers preventing the development of the site have been identified.

Landscape Character

- 3.17 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.
- 3.18 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.

- 3.19 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".

- 3.20 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.
- 3.21 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.
- 3.22 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

- 3.23 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.
- 3.24 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.
- 3.25 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.



Figure 03:03 Site Constraints & Opportunities

- 3.26 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.
- 3.27 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.
- 3.28 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

- 3.29 The site comprises several parcels of land currently in agricultural use and used mainly for grazing.
- 3.30 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.
- 3.31 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.
- 3.32 A tree survey will be 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

- 3.33 At this stage, a full ecological survey of the site has not been undertaken and, therefore, the presence or absence of notable species is not known at this time.
- 3.34 Primarily the fields have been used for arable crops and general stock grazing and so have little ecological value.
- 3.35 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.
- 3.36 The other key habitat are the existing hedgerows and these will be retained, maintained and planted up with additional hedgerow species to ensure their long term viability as a habitat for native flora and fauna.
- 3.37 Redevelopment of the site for housing presents opportunities to create new wildlife habitats and to enhance the ecological value of the site through, for example, the provision of new water features as part of the sustainable urban drainage strategy for the site, new areas of woodland planting and the management/enhancement of existing hedgerows within the site.

Topography

- 3.38 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 Perk) and open drain.

Residential Amenity

- 3.39 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.
- 3.40 The north-east corner of the site is bounded by the rear gardens of existing properties along Pendeford Mill Lane, Alexander Road and Downie Road.





3.41 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.

3.42 To the north, the site is overlooked by existing houses around the junction of Pendeford Mill Lane and Joeys Lane. There are also 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.

Archaeology and Heritage

3.43 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.

3.44 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

3.45 There are currently three 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.

3.46 One access has been consented off Pendeford Mill Lane to serve the 164 homes that have full planning permission. It is also intended that a second primary access will be required onto Pendeford Mill Lane to serve the wider proposed development.

3.47 Potential exists to create additional vehicular access points into the site from the west, off Lane Green Road and from the east off Barnhurst Lane. This approach will ensure a permeable and connected development that ties in well with the surrounding neighbourhood and existing street network.



3.48 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.

3.49 The section of Pendeford Mill Lane along the site's northern boundary also form part of the strategic cycle network.

3.50 Development of the site for housing presents an opportunity to create new pedestrian and cycle routes through the site that connect it with the surrounding neighbourhood and provide access to destinations and facilities within the village.

Wider Green Infrastructure Network

- 3.51 The internal green infrastructure network as illustrated in Figure 03:03 shall be retained, as will its connections out to the wider area.
- 3.52 This network shall form the structure of the proposed layout and provide not only a backdrop to the proposed development, but also links between surrounding wildlife habitats and site to ensure good connectivity is maintained in the form of wildlife corridors into and through the site.





4.0 Creating a New Neighbourhood

4.0 Creating a New Neighbourhood



Figure 04:01 Parameters Masterplan

A Vision for Land East of Bilbrook

- 4.1 Out of this contextual appreciation of place and analysis of the site springs our Vision. The development of this site will create a new sustainable neighbourhood close to the heart of Bilbrook. The development shall integrate and become part of the existing settlement pattern of the village.
- 4.2 This new neighbourhood will be part of the wider village, whilst being unique within the setting of the existing landscape in which it sits. A network of green spaces, wildlife corridors, habitats and recreational footpaths/cycleways will be developed within the proposed green infrastructure network, linking the site to the local facilities, wider settlement and countryside.
- 4.3 At the heart of the development, a new local centre is proposed comprising small scale retail uses, a new first school and village green.
- 4.4 The development will be characterised by high quality streets and spaces. A network of hard landscaped ‘Squares’ and ‘Mews’ spaces will provide character and focal points within the development. A clear and legible street hierarchy is proposed comprising a network of inter-connected streets, lanes and shared drives. A tree-lined avenue will form a central spine and link road through the development.
- 4.5 The neighbourhood will be sympathetic to the existing character and qualities of Bilbrook with houses that take inspiration from local vernacular architecture and materials. The form, scale and density of houses will be appropriate to the context of the local area.
- 2.6 This will be a sustainable development with an emphasis on protecting natural assets, promoting biodiversity and encouraging travel within the site by non-car modes.

An evolving masterplanning process...

- 4.7 Developing a visionary and unique masterplan is an iterative process. Initial ideas develop out of the site’s own context, constraints and opportunities, as touched upon in the previous chapter. That initial process provides a logical structure and framework for the masterplan and also, as further work is undertaken and discussions are held with stakeholders on ecology, movement, landscape, the appreciation of the local character and vernacular, our understanding develops of the historical evolution and development of the surrounding settlement. Additional layers of detail can then be added in terms of layout, access, hierarchy of streets and public realm, detailing of the built form, materials and landscape.

Creating a Place

- 4.8 In order to deliver the vision the masterplan must take account of the site’s context and constraints and turn them into opportunities for use in developing the proposals. The Parameters Masterplan illustrated here in Figure 04:01 is the result of that process. These opportunities emerged out of the earlier contextual and constraints work and provided the foundation for the masterplan. The following paragraphs describe each building block.

Parameters Masterplan

- 4.9 Figure 04/01 illustrates how the initial constraints and opportunities analysis has developed into a parameters masterplan illustrating spatial relationships between the built form, street pattern, public spaces, movement hierarchy and green infrastructure. It also illustrates the proposed access arrangements for the site and provides an overview of development density and yield.

Use and Quantum

- 4.10 The Parameters Plan illustrates a residential led development complimenting the surrounding established use mix, set within a strong Green Infrastructure network.
- 4.11 The mix of uses will include residential development (29.45 ha), a new local centre (1.1ha) and up to a Two Form Entry First School (1.7ha). The parameters plan shows a total of 14.65 ha of Green and Blue Infrastructure across the site including woodlands, wetlands and grasslands, incorporating naturalistic play areas, cycle routes and nature trails.
- 4.12 This new neighbourhood would contain a range of housing densities, offering choice and variety in terms of locations and size of homes. Densities would vary from the fringes at circa 35 homes per hectare up 40 homes per hectare at its heart. This varied density would roughly equate to a net average of 37 homes per hectare, or a gross density of around 23 homes per hectare.
- 4.13 Overall, it is estimated that up to 1,096 homes can be accommodated on the site based on the densities above.

Layout and Movement

- 4.14 The layout has emerged from the earlier constraints and opportunities work as set-out in Chapter 3. Figure 04:01 illustrates how the trees and hedgerows have been used to provide a starting point for developing a layout for the site. These elements have been used to establish a route hierarchy that forms the basis of the design.
- 4.15 The primary element is the Avenue which forms a central spine road through the development and provides access onto Pendeford Mill Lane, Lane Green Road and Barnhurst Lane. This would be a tree-lined route with potential for a dedicated cycleway. The route is flanked by a series of green spaces and hard landscaped ‘Squares’, providing a series of ‘moments’ as one moves through the development.
- 4.16 The Avenue would be designed to function as a new link road between Lane Green Road and Pendeford Mill Lane, to relieve congestion in Bilbrook.
- 4.17 Extending off the Avenue there are a number of secondary streets and lanes serving development parcels off the main route.
- 4.18 Where these routes intersect, raised thresholds, public squares or landscape features will be introduced to aid legibility and reduce traffic speeds.
- 4.19 The layout is also designed to ensure pedestrian and cycle permeability. There are clear opportunities to link into

surrounding footpaths, open spaces and other routes, thus ensuring that maximum permeability and integration is achieved.

4.20 Development is pulled back from the site's boundaries with houses being accessed off shared private drives. This approach allows for the retention of existing hedgerows and trees along site boundaries and the provision of strong green edges to surrounding streets.

4.21 The layout would ensure secure boundaries are created to the rear gardens of existing houses adjoining the north-west corner of the site.

Scale, Mix and Massing

4.22 It is proposed that approximately 1,096 homes can be accommodated on the site. The proposals have the potential to provide a range and choice of housing from two-bedroom dwellings to larger 3, 4 and 5 bed homes.

4.23 The character of the surrounding village suggests principally 2 storey (between 8 to 10 metres to ridgeline) development would be appropriate. 2.5 storey homes could be used in appropriate locations to provide increased scale at principal junctions, within mews, squares and around key green spaces to aid legibility and enclosure. Such taller units will not be used close to boundaries where they would overlook existing dwellings or gardens.

Landscape Strategy

4.24 The development of the layout for this site has taken the existing green infrastructure into account to provide a residential led mixed use development set within a substantial landscape structure.

4.25 There are significant opportunities for new tree planting and landscaping within the site, and infill planting especially on the western interface with the existing settlement edge of Bilbrook and the north eastern boundary adjacent to the Shropshire Union Canal. Furthermore, it is proposed that a substantial tract of public open space in the form of a linear park is located to separate the proposed built form from Barnhurst Lane and the Shropshire Union Canal. The hedgerow of Pendeford Mill Lane will be enhanced with infill planting and groups of native trees

4.26 The overall elements of the landscape strategy for the site can be summarised as follows:

- Retention 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 multi-functional 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 the adverse effects of the built form.

4.27 A range of trees to be introduced to reflect the street hierarchy including the central avenues, squares and mews. Native trees should be planted in the Central Green and linear parks to the north east and general perimeters including areas of public open space.

4.28 The landscape strategy has been taken into account when considering the mitigation for the identified potential adverse landscape and visual effects arising at the operational stage of the proposed development and these have been reflected when considering the overall residual effects.

Public Realm and Hard Landscape

4.29 The hard landscape materials palette would also be used to reflect the spatial hierarchy and patterns of movement through the development. Streets and some Lanes will be designed as traditional roads, with other Lanes, the Mews and Squares designed as more intimate, human scale shared spaces where pedestrian movement takes priority over motorised vehicles.

4.30 The shared space areas shall utilise small unit block paving and street trees to create an open and more human scale series of communal spaces which flow out into the surrounding Green Infrastructure network.

Sustainable Drainage Strategy (SuDS)

4.31 The Parameters Plan shows an indicative SuDS strategy based on a series of balancing ponds and network of swales set within the development's open spaces.

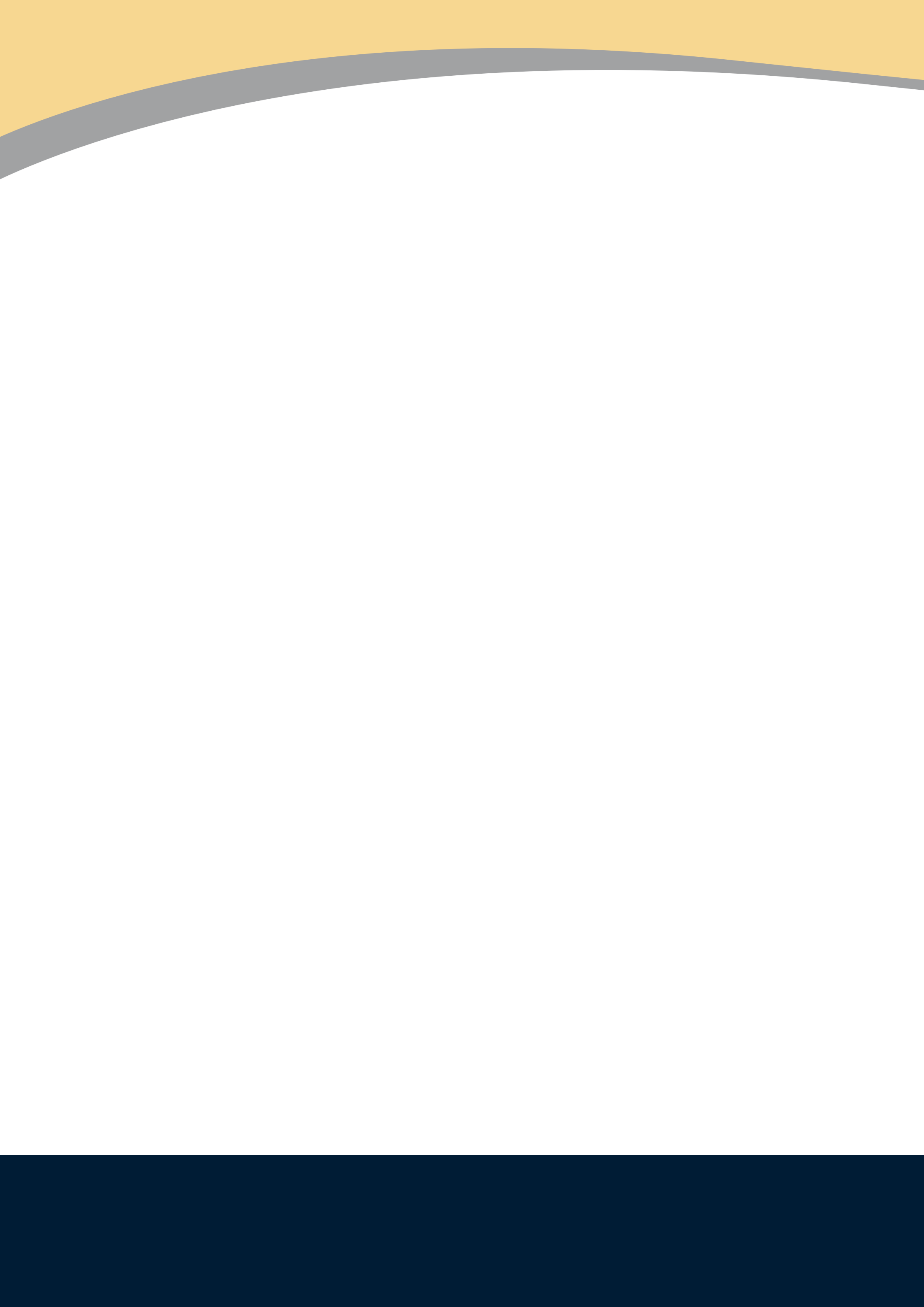
4.32 The SuDS strategy has a number of site specific objectives:

- To efficiently drain the site whilst not causing flooding down stream;
- To create suitable habitat for amphibians, invertebrates, birds, mammals, native aquatic and marginal plant life;
- Create ecological corridors across the site to enable wildlife to move more freely and native plants to spread and colonise the wider area;
- Create an aesthetically pleasing setting for development;
- Promote the site as a sustainable place to live and work;and
- Use SuDS features at property boundaries as part of the approach to Secure by Design.

In Summary

4.33 In summary, the Parameters Masterplan takes the constraints and demonstrates that the proposals will create an integrated extension to the settlement, set into the existing landscape creating a high quality addition to the village, offering much need homes in a choice of sizes to the local community.





5.0 Summary

5.0 Summary



Figure 05:01 Parameters Masterplan

Summary

- 5.1 This Development Framework supports a representation made by Pegasus Group on behalf of Bloor Homes to the South Staffordshire Local Plan Review, Issues and Options (Regulation 18) consultation. This representation relates to land east of Bilbrook, which Bloor Homes is promoting for residential-led development.
- 5.2 Bloor Homes is committed to working corroboratively with the Council and other local stakeholders with a view to delivering a high-quality residential led scheme at Bilbrook.
- 5.3 This statement has demonstrated that the land east of Bilbrook is a suitable and deliverable site for residential development, subject to its release from the Green Belt. We can confirm that there are no technical constraints which would preclude the site coming forward for residential development.
- 5.4 The emerging Parameters Plan presented in this document illustrates an appropriate urban design response to the site which responds to the unique constraints and opportunities presented by the site.
- 5.5 In summary, the proposed development would deliver the following key benefits:
 - Approximately 1,100 market and affordable homes with a range of housing sizes and tenures to help meet the demand for new housing in the area;
 - A new local centre;
 - A new first school;
 - Retention and enhancement of existing natural assets including hedgerows and trees;
 - A new link road between Lane Green Road and Pendeford Mill Lane, easing congestion in Bilbrook Village; and
 - New areas of public open space for use by new and existing residents;
- 5.6 The development of the site would result in a sympathetic, sustainable and integrated neighbourhood on the eastern edge of Bilbrook.
- 5.7 It is therefore submitted that land east of Bilbrook should be allocated for development through the Local Plan Review.

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