

SOUTH STAFFORDSHIRE LOCAL PLAN 2018-38 PREFERRED OPTIONS

LAND AT GRANGE FARM, COVEN

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 at Grange Farm, Coven 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 a number of strategic housing allocations (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 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.

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

- 2.13 The Vision is clear and succinct, however as presently drafted in doesn't appear locally relevant and contains no spatially specific elements.
- 2.14 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?

- 2.15 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 a 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 Coven to allow for development within the plan period and beyond. Accordingly, the exceptional circumstances that warrant the further release of Green Belt land at Coven include:

- It would allow for the necessary growth in Coven 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 Coven 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 also needs 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. Indeed, the NPPF states that when defining Green Belt boundaries, plans should *“identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period.”*
- 3.9 In light of the limited growth proposed at Coven within the plan period, it will be important that further growth is directed to this village in the longer term to support the viability and vitality of local services and facilities.

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

- 3.10 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 relevant to housing delivery.

Local Housing Need

- 3.11 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.

3.12 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;”*

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

3.14 These circumstances are considered in further detail below.

Unmet Need from Neighbouring Authorities

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

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

3.17 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.

- 3.18 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.
- 3.19 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.
- 3.20 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

- 3.21 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.
- 3.22 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.
- 3.23 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.
- 3.24 Further evidence is required 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

3.25 Bloor Homes supports the settlement hierarchy which considers the relative sustainability of villages within South Staffordshire District. The Tier 1 and Tier 2 settlements identified contain the widest range of services and facilities and by focusing new homes to these settlements would provide an opportunity to increase sustainability and self-containment. Coven appears to achieve the highest services/facilities rankings of all villages within the District of the Tier 3 villages within the latest Rural Services and Facilities audit, only falling short of Tier 2 status by virtue of the lack of secondary/high school provision.

Spatial Distribution of Housing Growth

3.26 Bloor Homes supports the proportionate distribution of housing growth across the villages, with the most sustainable villages to deliver a higher amount of growth.

3.27 Housing growth also appears to be focused to the north of the District which aligns to the location of the most sustainable 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 sites at ROF Featherstone, i54 and Four Ashes. These elements of the District are also far more connected to major road and rail infrastructure.

3.28 Allowing growth in the most sustainable 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.

3.29 Concerns are however raised that insufficient growth has been focused to the Tier 3 settlements, including Coven, where the need to support and strengthen existing services and facilities is important.

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 at Grange Farm, Coven 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 identification of proposed strategic housing allocations at Bilbrook and Penkridge.

Question 7b: Do you agree 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?

4.3 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.

4.4 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?

4.5 This representation relates to Land at Grange Farm, Coven. 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.

4.6 As set out above, Bloor Homes wishes to raise concerns that insufficient growth has been focused to the Tier 3 settlements, including Coven, where the need to support and strengthen existing services and facilities is important.

4.7 To meet locally derived housing need arising in the village within the plan period and beyond, there is justification for identifying a further housing allocation for Coven, in addition to the single safeguarded land site proposed.

4.8 In addition, safeguarded land should be identified for longer term housing needs associated with the village.

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 or above dwellings 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 at Grange Farm, Coven and the lack of identified unmitigable constraints, it is realistic to expect the delivery of an efficient scheme that could achieve a minimum average net density of 35dph. However, this would be achieved through the provision of character areas of varying density and would be reflective of the character of surrounding development.

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 with increased infrastructure costs.
- 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 2018-2039.

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 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

- 5.46 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.
- 5.47 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.
- 5.48 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

- 5.49 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.

5.50 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

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

EC3 – Inclusive Growth

5.52 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.

5.53 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.

5.54 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

5.55 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

5.56 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

5.57 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

- 5.58 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.
- 5.59 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.
- 5.60 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?

- 5.61 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?

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

6. Land at Grange Farm, Coven

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 at Grange Farm, Coven as shown on the Site Location Plan appended to this representation (see Appendix 1).

6.3 This land represents a logical site for development within the sustainable settlement of Coven, providing an opportunity for delivering approximately 189 new homes with associated supporting infrastructure.

6.4 The site has been historically used for agriculture and is identified as being in the Green Belt. However, the site is bordered by the A449 corridor to the east and the built-up area of Coven to the north, south and west. Due to the substantial edge of the A449 corridor, the site contributes little to the Green Belt quality / openness. Development of the site would effectively infill an area of undeveloped land within the established confines of the village. Considering this, the site is appropriate for development as it would result in the sustainable growth of Coven, close to its Village centre.

6.5 Within Coven there is a local centre comprised of a village hall, post office and cafe, public house, two food retail stores, pharmacy, takeaway, bakery, hairdresser, car garage / showroom and small retail businesses. The centre of the site is situated 230 metres north of the local centre.

6.6 Coven is located approximately 7.5km north of Wolverhampton, 9.1km south west of Cannock and 16.7km south of Stafford. There are four bus stops within a 230m radius of the site that connects Coven to Brewood, Stafford, Wheaton Aston and Wolverhampton.

6.7 The illustrative masterplan introduced through the attached Vision Document (Appendix 2) identifies the following key proposals:

- Provision of approximately 189 market and affordable homes;
- Provision of approximately 3.5 hectares of green infrastructure, evenly distributed through the site, including provision of village greens and green corridors;
- Provision of SuDS;

- A new cemetery extension for St Paul's Church;
- A development which respects the adjoining neighbours in terms of providing landscape buffers between existing and proposed homes; and
- A sensitive, high quality green infrastructure network that maintains and improves biodiversity in the area, whilst maintaining much of the existing hedgerows and trees.

Sustainability Appraisal (SA) Findings

- 6.8 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.
- 6.9 It is noted that the site assessment for Land at Grange Farm, Coven (Site 085) scores well from a sustainability perspective against objectives that relate to access to services and facilities within the village.
- 6.10 The Sustainability Appraisal notes the site is of lower Green Belt harm than the majority of land around the village.

Sequential Test

- 6.11 The Council's spatial development strategy identifies an infrastructure led approach to growth. Bloor Homes contends that additional growth is required within the Tier 3 settlement of Coven with the plan period and beyond to support existing services and facilities and to provide additional infrastructure, including an extension to the cemetery.
- 6.12 Further allocations, in addition to the single safeguarded land site, should be identified within Coven.

Green Belt Harm

- 6.13 The site lies within the West Midlands Green Belt, adjacent to the current built up area of Coven and bounded to the north, south and west by the existing urban fabric of the village and the A449 to the east.
- 6.14 Whilst the Council's Green Belt Assessment (2019) indicates that development of the site would result in a 'low-moderate' level of harm to the purposes of the Green Belt, the conclusion for Green Belt Sub-Parcel ref: S32Ms1 confirms the release of this site for development would not affect the integrity of the wider Green Belt land:

“The sub-parcel makes a strong contribution to preventing encroachment on the countryside. It lies adjacent on its western edge with the inset residential development at Coven, and is bound to the east by Stafford Road. Despite its spatial openness, the relationship of this land to the wider countryside is weakened by the presence of Stafford Road as a strong boundary to the east. As such, the release of this land would result in a simpler and more consistent Green Belt boundary with open countryside to the west, and would not affect the integrity of the wider Green Belt land.”

- 6.15 The conclusion in the Green Belt Assessment that the release of this site would result in a simpler and more consistent Green Belt boundary derived by the A449 is fully supported by Bloor Homes.

Landscape Sensitivity

- 6.16 South Staffordshire District Council’s Landscape Study (2019) finds that the site has ‘moderate’ sensitivity in landscape terms.
- 6.17 Whilst the findings of the Landscape Study are not necessarily disputed by Bloor Homes, the site forms part of a much larger parcel that has been subject to assessment within the Landscape Study, including a large area of land to the east of Stafford Road (A449). The Landscape Study recognises that the A449 provides a strong barrier to further expansion and it is contended that land to the west of the A449 has a lower landscape sensitivity than that which lies to the east and represents a logical infill within the village, if sympathetically designed.
- 6.18 Visually, this is a landscape of mixed arable and pastoral farming on a flat to gently rolling landform where the fabric of the landscape is breaking down under increasing pressure from adjacent urban areas. Deterioration of the medium scale field pattern is leading to large scale open areas with gappy hedges, grown up thorn trees and scattered stunted oaks. Further away from the urban pressures the overall impression is of a landscape more cared for and in good condition, with hedgerows being well maintained to an even height and reinforcing the smooth texture of the landscape.
- 6.19 Sensitive visual receptors are identified as being localised to the western and southern edges accounting for the interface with the existing residential area of Coven, however, most dwellings back onto the site boundary with an array of garden fences and vegetation forming the settlement edge. The north western boundary is adjacent to St Paul’s Primary School. The eastern boundary is adjacent to the dual carriageway of the A449.

6.20 The development of the illustrative proposal for this site has taken the existing green infrastructure into account to provide a landscape-led approach to development. The landscape strategy proposes the following key features:

- Retention of the existing elements that make up the site's green infrastructure, such as tree and hedges and integrating these into the development, giving the scheme an immediate sense of maturity;
- Ensuring the gaps in the existing hedge adjacent to the boundaries and the A449 are in-filled with native trees and hedge planting. Evergreen species of holly to be included in the mix to provide effective screening through the winter months;
- Ornamental and native hedge planting to be planted in and around the proposed development to soften the adverse effects of the built form.

6.21 A range of trees are proposed to be introduced to reflect the street hierarchy including the central avenues, squares and mews. Opportunities exist to plant native trees in the Village Greens and general perimeters including areas of public open space.

6.22 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 and these have been reflected when considering the overall residual effects.

6.23 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

6.24 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.

6.25 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. The Grade II heritage assets of Grange Farm, The Beeches and Church of St. Paul are all located to the south of the site and offer opportunities which

have informed the illustrative masterplan, with the creation of a village green to the north of Grange Farm and landscaped areas to the east and west.

- 6.26 Green corridors offer the opportunity to retain an early east – west aligned trackway which leads to Grange Farm, along with historic hedgerows within the site. Provision of space for a cemetery extension to the north of the Church of St. Paul safeguards space to the north of that heritage asset.
- 6.27 In summary, the technical work undertaken to date concludes there are therefore no heritage constraints to the allocation of the site for residential development.

Surface Water Flooding

- 6.28 The site lies within Flood Zone 1 which has the lowest probability of flooding.
- 6.29 A small stream runs across the northern part of the site flowing from Stafford Road towards the school, before flowing into the school grounds. The site gently falls from east to west and thus drains in the same direction.
- 6.30 To address initial concerns raised by the LLFA, a Sustainable Drainage Strategy (SuDS) can be delivered:
- To efficiently drain the site whilst not causing flooding downstream, including the school site;
 - 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

- 6.31 A Technical Note prepared by Mode Transport Planning (**Appendix 3**) reviews the highways and transport conditions of the local area and confirms the sites suitability and deliverability. It confirms that a single access can be created to serve up to 200 dwellings (subject to internal layout), with potential for an emergency access if necessary. The Technical Note recommends that access is best served from the west of the site along School Lane due to the distance between nearby junctions. The Technical Note highlights the schemes focus on prioritising pedestrian and non-car modes of transport and, the opportunity to

integrate the site with existing public rights of ways through and around the site.

- 6.32 The site is relatively level, gently sloping downwards to the north, making it suitable to design and promote inclusive accessibility. The Illustrative Masterplan is proactive in this regard as it presents a legible and accessible layout with appropriate road and pedestrian connections. The site is well-located to the centre of Coven and there are four bus stops adjacent or near to the site (all within 230m radius). This will provide residents with diverse, convenient, safe and healthy means to travel through the site and local areas. Most importantly, this scheme presents an accommodating and welcoming layout that will be enjoyed by all residents.
- 6.33 The road layouts and parcels have been laid out to promote the site's legibility and permeability. The Illustrative Masterplan shows how key views are maintained and established across the site to create this accessible environment. Particularly in the centre, where the central 'Mews' area directly will be visible from the Village Green (South) and, the Village Square will also be visible from the edges of the site (south and east).
- 6.34 Bloor Homes notes SCC Highways view that an appropriate access cannot be achieved via Brewood Road, however the appended Technical Note recommends a primary vehicular access taken from School Lane would be sufficient to serve the site.

Site-Specific Opportunities

- 6.35 The Illustrative Masterplan identifies the provision of key infrastructure to accommodate development on the site. This includes approximately 3.5ha of 'Green Infrastructure' which includes pedestrian and wildlife corridors that will connect to existing public footpaths around the site, Village Greens within the site (north and south) and a cemetery extension at the south-east of the site (0.31ha) associated with St. Paul's Church.

Suitability

- 6.36 The information set out above, read in conjunction with the appended promotional document and Transport Technical Note, demonstrate that land at Grange Farm, Coven, is a suitable site.
- 6.37 The land parcel occupies an appropriate location in the context of the local centre, existing residential development and strategic highways corridors. The allocation of the site for residential purposes will not result in unacceptable

harm to the Green Belt, but instead will provide a sustainable and well-designed extension to Coven; that will enhance the environment by enhancing wildlife corridors and providing open spaces, to benefit local resident's well-being, while contributing to the success of local businesses.

Deliverability

- 6.38 There is an agreement in place between the landowner and Bloor Homes to facilitate the development of the site.
- 6.39 Bloor Homes intends to undertake further technical work to demonstrate the deliverability of land at Grange Farm, Coven, 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.
- 6.40 The Bloor Homes is a national housebuilder with no funding or capacity constraints and the site is an area of high market demand. The site is deliverable and immediately available and, subject to allocation and removal of the land from the Green Belt, could start to deliver homes and associated community benefits within the next 5 years.

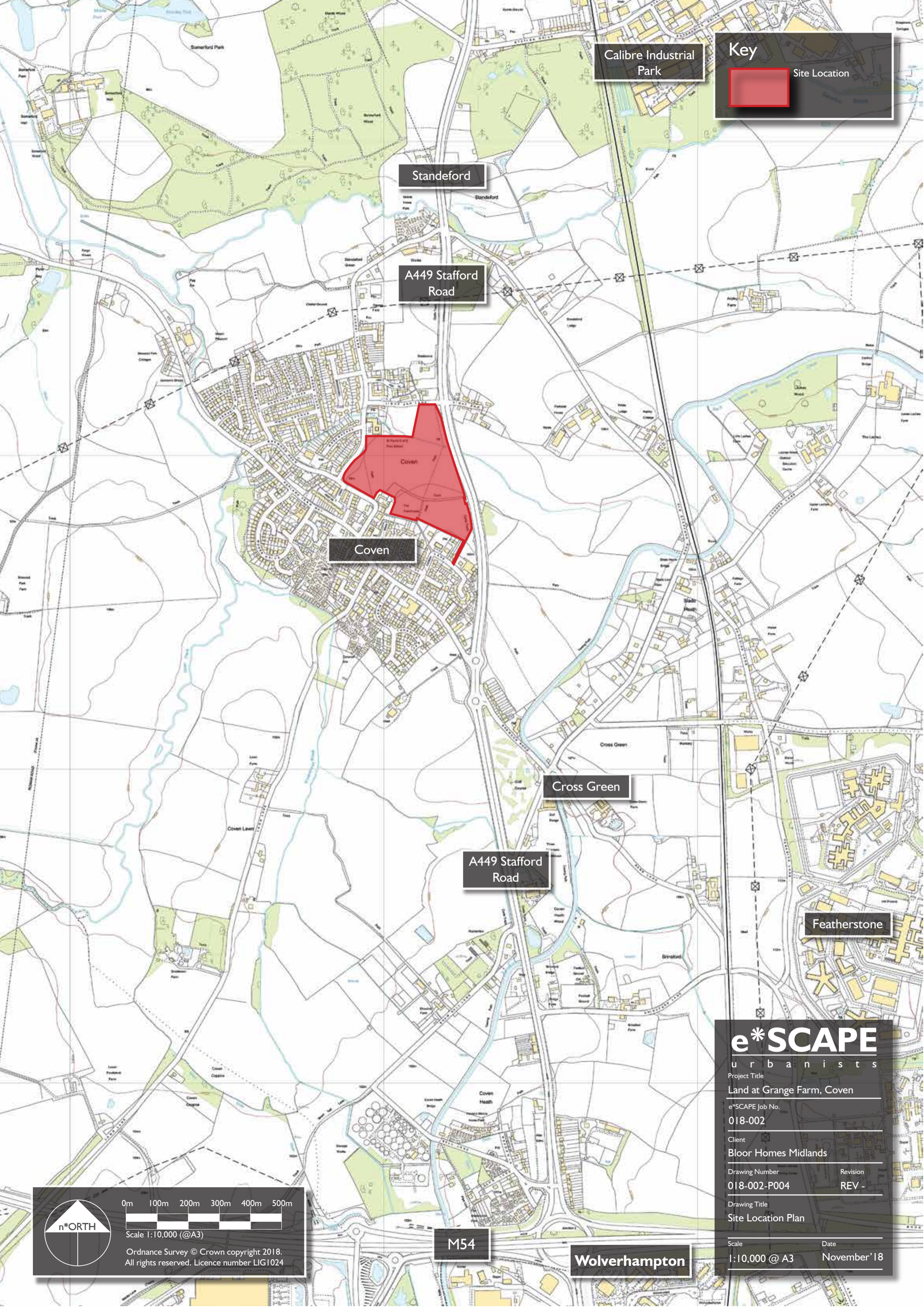
7. Conclusion

- 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 at Grange Farm which is being promoted for residential-led development in the Tier 3 village of Coven.
- 7.2 Bloor Homes supports the Council's proposed spatial development strategy, 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 sustainable settlements such as Coven provides an opportunity to meet locally arising housing needs and offers opportunity to support existing and deliver new services, facilities and infrastructure that would assist in addressing local issues.
- 7.3 Further evidence should be provided in respect of the housing requirement to consider whether there is a need for additional housing to support likely jobs growth. In addition, Bloor Homes considers this Local Plan should be identifying further allocations within Coven and identifying safeguarded land to ensure permanence of the Green Belt well beyond the end of the plan period. Site 085 should be considered in respect of both.
- 7.4 In addition, 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 at Grange Farm, Coven 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 at Grange Farm, Coven should be removed from the Green Belt to assist in meeting local housing needs within the plan period or beyond.

APPENDIX 1

Site Location Plan



Calibre Industrial Park

Key

Site Location

Standeford

A449 Stafford Road

Coven

Cross Green

A449 Stafford Road

Featherstone

M54

Wolverhampton

n*ORTH

0m 100m 200m 300m 400m 500m

Scale 1:10,000 (@A3)

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e*SCAPE
urbanists

Project Title
Land at Grange Farm, Coven

e*SCAPE Job No.
018-002

Client
Bloor Homes Midlands

Drawing Number
018-002-P004

Revision
REV -

Drawing Title
Site Location Plan

Scale
1:10,000 @ A3

Date
November '18

APPENDIX 2

Vision Document

Land at Grange Farm, Coven

Vision Document

November 2018





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1.0 Introduction

I.0 Introduction

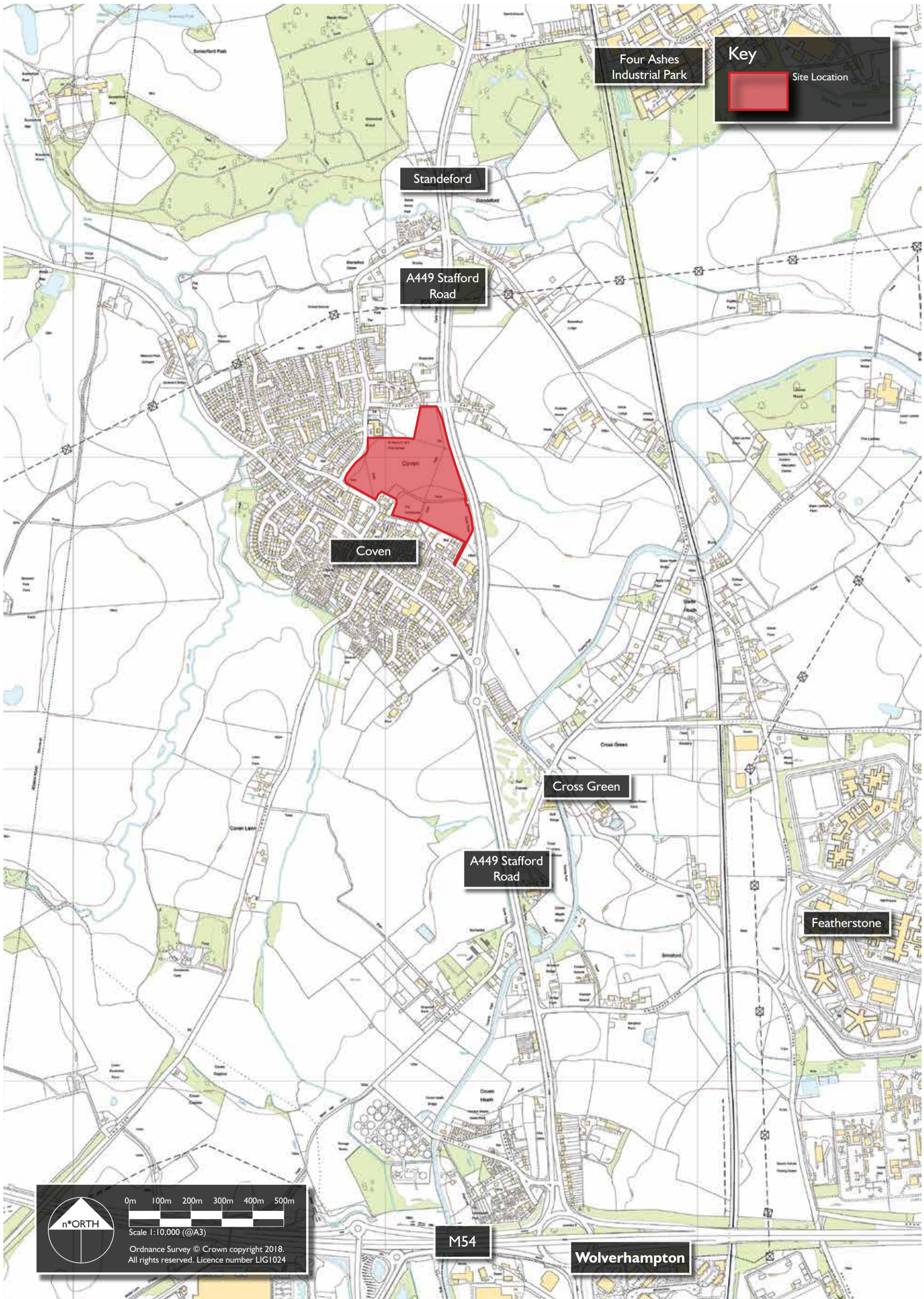


Figure 01:01 Site Location

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 at Grange Farm, Coven ('the site'), South Staffordshire. The site has 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. The site is considered to be suitable for release from the Green Belt to help meet the housing needs of the District as part of the Local Plan Review Process.
- 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 Coven 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 As we go on to explain in this development framework, the site is sustainably located and we are not aware of any physical, environmental, ecological or other constraints preventing the site coming forward for housing.

The Site

- 1.5 The land at Grange Farm is located in Coven, just to the north of Wolverhampton.
- 1.6 Coven is identified as a 'Local Service Centre' in the adopted Core Strategy, in recognition of the services and facilities available within the settlement. It is therefore considered as a sustainable location suitable for housing growth, and consequently sites elsewhere in the village have been removed from the Green Belt and either allocated for residential development or safeguarded for future development in the adopted Site Allocations Document.
- 1.7 Bloor Homes currently controls the land as illustrated in the Site Boundary Plan (Figure 01:01) and is committed to the delivery of a high-quality, contextually responsive and comprehensive residential-led scheme providing much needed new housing and community facilities for the village.
- 1.8 As we go on to discuss in this document, the site is well-related to the existing village, surrounded on three sides by Coven and on the fourth (eastern) side by the A449 Stafford Road which runs north-south. A development scheme at the site would be a logical infill within the village, if sympathetically designed.

Headline Benefits

- 1.9 Key benefits of the proposed scheme include the delivery of:
- approximately 189 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;
 - a new cemetery extension for St Paul's Church;
 - a development which respects the adjoining neighbours in terms of providing landscape buffers between existing and proposed homes; and
 - a sensitive, high quality green infrastructure network that maintains and improves biodiversity in the area, whilst maintaining much of the existing planting, hedgerows and trees.



2.0 Being Part of Coven

2.0 Being Part of Coven

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 Grange Farm, Coven.
- 2.2 The development of this site will create a new sustainable neighbourhood within the village. The development shall nestle between the existing houses on Brewood Road and School Lane, whilst also being bounded, enclosed and softened by the primary school, brook, hedgerows and associated trees.
- 2.3 This new neighbourhood will form part of a slightly expanded village, albeit at a site that already benefits from a high level of settlement enclosure. The development will therefore represent a logical infill of Coven rather than an unrestricted expansion into open Green Belt land. A strong and bold network of green spaces, wildlife corridors, habitats and recreational footpaths/cycleways will form an integral part of the Green Infrastructure network, linking the site to the local facilities, wider settlement and countryside.
- 2.4 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 189 dwellings at the site. The proposals will enable the provision of a network of public open spaces for use by the existing and new members of the community.
- 2.5 The result will be a sympathetic, sustainable and integrated neighbourhood on the eastern edge of Coven, within a logical infill site, creating a strong addition to the village and complementing the surrounding neighbourhoods.

Our Vision for the Site

- 2.6 Our Vision for Grange Farm has sprung out of the appreciation of the surrounding context and features of the site itself as set out in detail in Chapter 4 with the Vision itself explored at the start of Chapter 5. However the panel to the right summarises that Vision:

“Bloor Homes’ Vision for Grange Farm will create a new sustainable neighbourhood at the heart of Coven. The development shall become part of the existing settlement pattern of the village.

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.

The Streets, Greens, Mews and Squares shall be enclosed and overlooked by the homes, creating a heart and focus to the neighbourhood.

The neighbourhood would reflect the historic village character and contain a choice and variety of homes. The fringes of the neighbourhood shall use a range of detached properties, drawing their inspiration from the local vernacular in terms of their layout, design and materials to create a softer and more rural fringe, enabling it to blend and blur into the open countryside.

This organic approach works with the grain of the existing landscape and sympathetically overlays development. It will quickly mature and become a part of the setting and character of Coven.”



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.



Photograph 01: Half-timbered house within the heart of the village of Coven.

Appreciating the Physical Context

- 3.4 In demonstrating that the site at Grange Farm, Coven 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 04:01 the site lies on the eastern edge of Coven, adjoining the A449 Stafford Road, surrounded on three sides by existing village and on the fourth side by Stafford Road itself.
- 3.6 Coven sits within a good communications network within the West Midlands and on the western fringes of the Black Country. It is part of a group of villages and towns which lie just to the north of Wolverhampton and straddle the A449 Stafford Road corridor. These rural settlements contrast with the townscape of Wolverhampton just a few minutes drive to the south.
- 3.7 Jobs and employment opportunities are available locally with the Four Ashes Industrial Park just to the north east and the various business and industrial parks to the south, on the northern fringes of Wolverhampton.
- 3.8 Stafford Road links the village to Wolverhampton and the M54 to the south and north to Penkridge, Stafford and the M6 (via the A5).
- 3.9 The M54 thus provides direct links to Shrewbury and Telford, with the M6 providing good connections to Birmingham to the south and Stoke-on-Trent and Manchester to the north.
- 3.10 The A5 also provides direct access to Cannock just to the east of the M6 and north east of Coven itself.
- 3.11 The nearest train stations are at Penkridge with trains to Crewe, Liverpool, Birmingham and London Euston or at Codsall with trains to Wolverhampton, Birmingham, Shrewsbury, Wrexham, Chester and Holyhead.

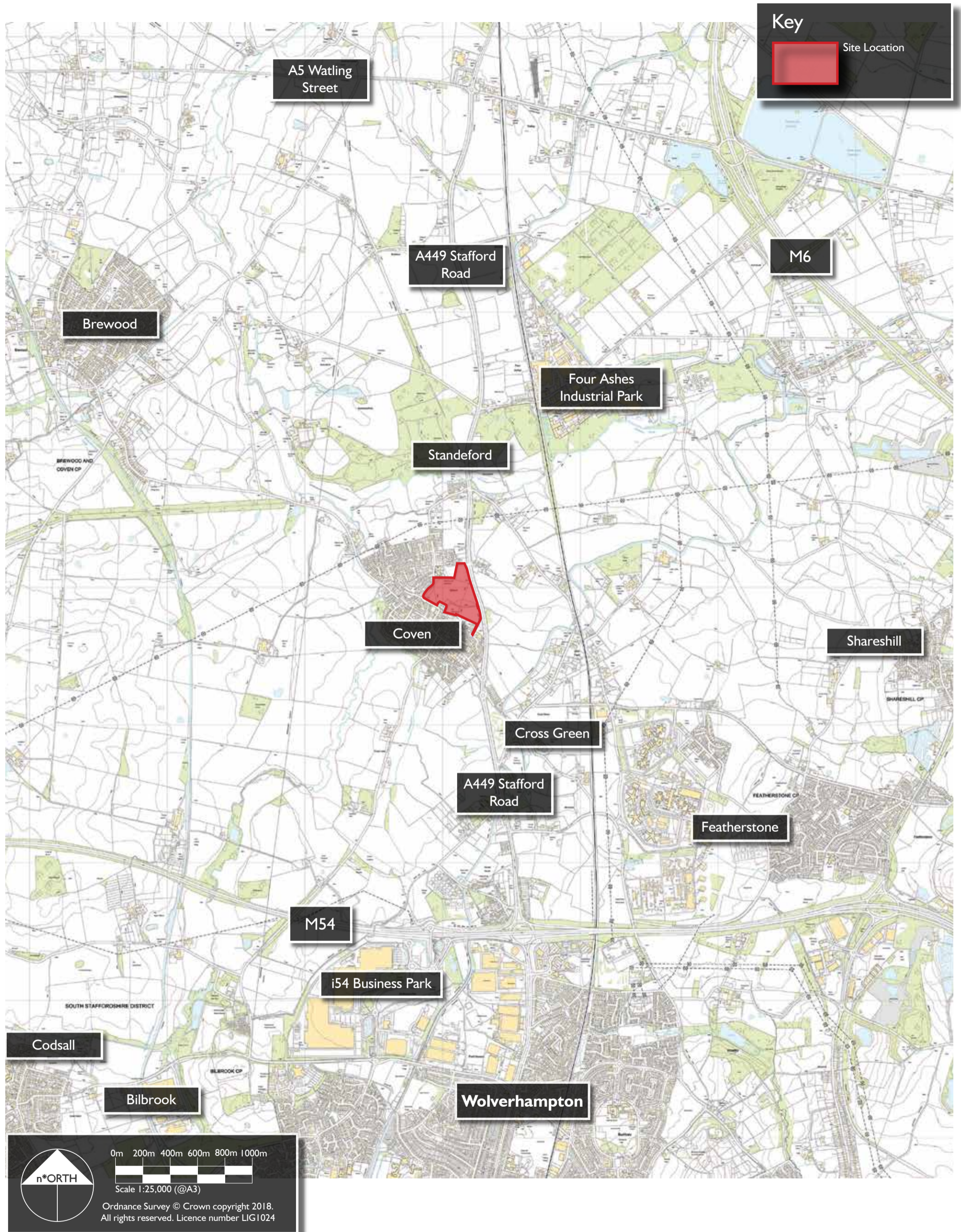


Figure 04:01 Sub-Regional Context

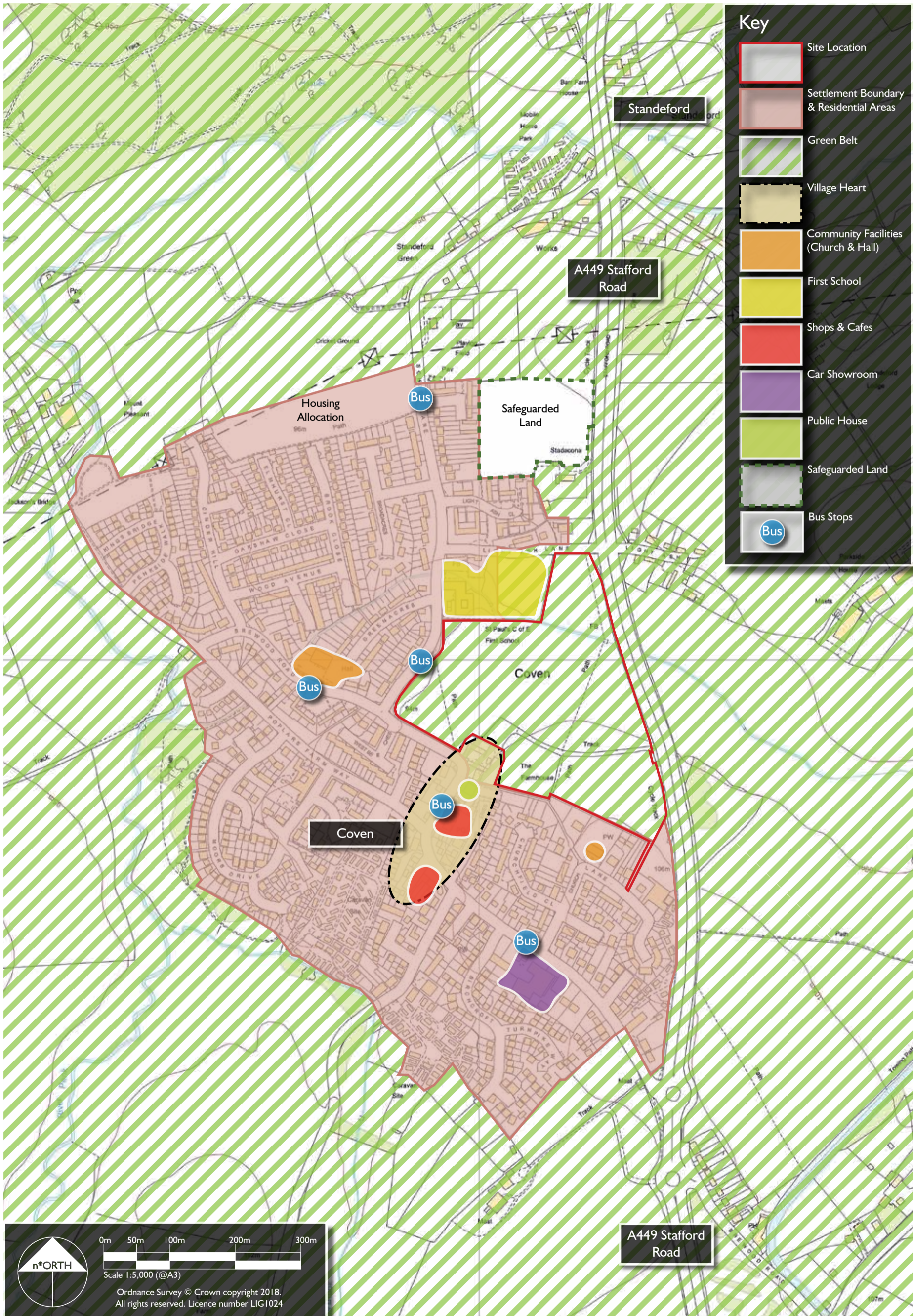


Figure 04:02 Local Context

Local Context

- 3.12 As stated above Coven sits within a good communications network within the West Midlands lying just to the north of Wolverhampton within the A449 Stafford Road corridor. Whilst there are few employment opportunities in the village itself it is in close proximity to the Four Ashes Industrial Park and the various business and industrial parks located on the northern fringes of Wolverhampton, including the highly successful and expanding i54 Business Park.
- 3.13 Coven lies in the district of South Staffordshire and makes up a parish with Brewood, the neighbouring village which is located just to the north west of Coven.
- 3.14 Historically Coven was a working village with an iron foundry, chain making, locksmiths, blacksmiths and steam and traction engine workshops. A number of historic properties lie within the current settlement boundary with the Grange Farm directly abutting the site and is reputed to have hosted King Charles, en route to Moseley Hall.
- 3.15 Coven has a vibrant community with St Paul's Church, St Paul's First School, the Memorial Hall, The Rainbow Inn and a number of local shops, including a pharmacy located in the village heart.
- 3.16 Various community groups are active in the area including Scouts and Guides, youth groups, local amateur theatre groups, play groups, Church groups, historical groups, the Women's Institute and amateur art groups.
- 3.17 The village does not have its own railway station, but services can be accessed from Penkridge to the north or Codsall to the south west. Or indeed via the central station in Wolverhampton.
- 3.18 The village does have a series of bus stops located through the village as illustrated in Figure 04:02 opposite. The services include the number 54, 54A, 877 and 878 providing connections to Stafford, Penkridge, Wolverhampton and a number of villages in between.
- 3.19 In planning terms the village is inset from the Green Belt as illustrated in Figure 04:02 with a small housing allocation to the northern fringe and an area of safeguarded land to the north eastern edge, adjoining the A449 Stafford Road.
- 3.20 As is clearly indicated by Figure 04:02 the site is enclosed on three sides by the current village and bounded on the fourth side by the Stafford Road corridor itself and represents a logical extension and infill site to the village.
- 3.21 As Green Belt, its openness is compromised by its enclosure, the visibility of the adjoining neighbourhoods and the infrastructure in the form of Stafford Road. By its very nature the site is a logical infill development parcel.
- 3.22 A number of Public Rights of Way cross the site and are well used and connect the heart of the village with some of the more peripheral neighbourhoods.
- 3.23 In summary therefore development on the site:
- would form part of a vibrant village;
 - benefits from a high level of containment, surrounded by existing residential uses on two sides (north, west and south) and other built development including a primary school to the north-west;
 - will form a natural 'rounding off' of the eastern part of the village; and
 - is enclosed to the east by Stafford Road which represents an enduring boundary, which means there is no potential for further expansion of Coven to the east.
- 3.24 The village is primarily a residential settlement, but has a clearly defined heart and a strong and active community.



Photograph 02: St Paul's Church which borders the southern edge of the site.



Figure 04:03 Site Constraints & Opportunities

Site Constraints & Opportunities

Introduction

- 3.25 As stated previously, Bloor Homes believe in developing proposals which complement the character of the local area, working with the natural grain and flow of the land and utilising existing natural and man-made features, which will give our evolving designs an immediate sense of place and maturity.
- 3.26 An important part of the masterplanning process is to understand the site and surrounding context in detail. 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 04:03. A summary of that work which has informed the formulation of the development framework is provided below. In summary, no technical barriers preventing the development of the site have been identified.
- 3.27 The site is bounded by the A449 Stafford Road to the east which is separated from the site by a tall native hedgerow and intermittent trees which provide some screening of the site from the road.
- 3.28 To the north the site abuts the narrow Light Ash Lane before being separated from it by the school and playing fields to the north west.
- 3.29 School Lane borders the site to the west and provides direct access to the site. Again strong, tall native hedgerows separate the site from the lane.
- 3.30 Brewood Road forms the site boundary between Grange Farm and the junction with School Lane and like School Lane provides the opportunity for direct access to the site. This boundary is again formed by a tall native hedgerow and associated trees.
- 3.31 The final part of the southern boundary is formed by hedgerows related to residential gardens, a footpath and the graveyard of St Paul's Church. The footpath provides access to the site via a kissing gate and public right of way, as illustrated in Figure 04:03 opposite.

Existing Vegetation & Trees

- 3.32 A strong historic field pattern of native hedgerows sub-divides the site into five field compartments, as illustrated opposite. These hedgerows form an important character trait of the site and shall be integrated into the development as part of the green infrastructure network.
- 3.33 A hollow way runs east-west across the site from Stafford Road to Grange Farm and it is assumed that this is the historic route of the access way to the farm. Tall hedgerows border the track and a Public Right of Way runs along it.
- 3.34 A number of mature native trees are located either within the hedgerows or fields and create a setting for the site and wider village.
- 3.35 The trees and hedgerows combine to filter views of the site from the wider village and all shall be retained where possible with only short breaks being created through the hedgerows to allow access between the field compartments.

Watercourses

- 3.36 A small stream runs across the northern part of the site flowing from Stafford Road towards the school, before flowing into the school grounds. The site gently falls from east to west and thus drains in the same direction.
- 3.37 The site is located in Flood Zone I with the brook feeding into the River Penk catchment to the west.

Landscape & Visual Appraisal

Landscape Character

- 3.38 The site is located within the Settled Heathlands 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'.
- 3.39 The site generally accords with the key characteristics and descriptions but is described as a rare landscape type associated with areas of glacial and alluvial drift that formerly



Photograph 03: View North from the corner of Brewood Road and Grange Farm looking across footpath towards St Paul's First School.



Photograph 04: View South East from the brook looking towards St Paul's Church across the hollow way farm track in the mid-ground.



Photograph 05: View West along footpath between St Paul's Church and village centre (grave yard extension to right with site beyond).



Photograph 06: View West along the hollow way which appears to form the original farm access to Grange Farm which is just visible in the background.



Photograph 07: View North East from the Public Right of Way adjoining St Paul's Cemetery towards the A449 Stafford Road.

supported heathland. There is a distinction to be made, between landscapes of the alluvial drift of old river terraces, and of the glacial drift of other gently rolling lowland areas. Only the latter type is found in this Regional Character Area. In both cases the soils are mainly acid sands and brown earths which support cropping and mixed farming in a regular pattern of small and large hedged fields. Many areas are quite well wooded, although there are few hedgerow trees. The settlement pattern is dispersed and urbanised in places. Stream valleys and the canal route are associated with a subtle change in character of the landscape, with low-lying wetter pasture areas and waterside tree species.

3.40 The landscape is characterised by its heathland origins, particularly in the regular, more recently enclosed farmland, with a strong presence of bracken and birch in the woodlands and hedgerows. In the flatter areas, hedgerow trees are predominantly small sized oaks, and sufficiently numerous to coalesce and give filtered views that stop within two to three fields.

3.41 A network of both ancient and straight lanes dissects the area with numerous individual houses and small farms. Railways, power lines, busy main roads and motorways combine with encroachment of housing and industry to reduce the quality of this landscape.

3.42 The incongruous features within the landscape are busy main roads; large length of post and wire fencing; urban encroachment; power lines; electrified railway. The critical factors which currently limit landscape quality are the relatively poor survival of characteristic semi-natural vegetation particularly heathland.

3.43 The proposed development site is not within an area of Landscape Sensitivity but all proposals will have to generally be compliant with South Staffordshire Local Plan and Core Strategy (2012) Policy EQ4: Protecting and Enhancing the Character and Appearance of the Landscape:

“The intrinsic rural character and local distinctiveness of the South Staffordshire landscape should be maintained and where possible enhanced. Trees, veteran trees, woodland, ancient woodland and hedgerows should be protected from damage

and retained unless it can be demonstrated that removal is necessary and appropriate mitigation can be achieved. For visual and ecological reasons, new and replacement planting should be of locally native species.

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

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

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

Visual Amenity

3.44 Visually, this is a landscape of mixed arable and pastoral farming on a flat to gently rolling landform where the fabric of the landscape is breaking down under increasing pressure from adjacent urban areas. Deterioration of the medium scale field pattern is leading to large scale open areas with gappy hedges, grown up thorn trees and scattered stunted oaks. Further away from the urban pressures the overall impression is of a landscape more cared for and in good condition, with hedgerows being well maintained to an even height and reinforcing the smooth texture of the landscape.

3.45 Sensitive visual receptors are identified as being localised to the western and southern edges accounting for the interface with the existing residential area of Coven, however, most dwellings back onto the site boundary with an array of garden fences and vegetation forming the settlement edge. The north western boundary is adjacent to St Paul’s Primary School. The eastern boundary is adjacent to the dual carriageway of the A449.



Photograph 08: View West along Light Ash Lane from the junction with the Stafford Road.



Photograph 09: View North along the Stafford Road footpath/cycleway with the site boundary hedge on the left.



Photograph 10: View from brook north towards Ash Lane.



Photograph 11: View north east towards Stafford Road from hollow way farm track.



Photograph 12: View west from Public Right of Way towards Grange Farm.

- 3.46 There are three public footpaths that cross the proposed development site, one diagonally links School Lane with Brewood Road whilst the other winds around the north of Grange Farm and forms part of the Hollow Way. The third footpath travels north to south linking Church Lane with Light Ash Lane and the A449. There will be an obvious change in view to these receptors as residential housing is introduced but the landscape strategy outlines the mitigation measures that will be introduced as part of the development to reduce any potential adverse effects on the visual amenity of these receptors.
- 3.47 Generally, the proposed development site is visually well contained when viewed from further afield. Views from the west and south are screened by the existing Coven settlement and from the north and east by the vegetation on the A449 roadside.
- 3.48 It is likely that some views are achievable into the site from higher ground in the north and east but tend to be limited due to the landform and vegetation within the existing countryside. The landscape strategy will ensure that appropriate planting is introduced to provide mitigation for any identified adverse effects.
- 3.49 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.

Habitats

- 3.50 Primarily the fields have been used for arable crops and general stock grazing and so have little ecological value.
- 3.51 The northern field compartment abutting Light Ash Lane is made up of rough grassland and some of this area will be retained as wildflower meadows, along with new meadows located in other areas of the Green Infrastructure network.
- 3.52 The other key habitat are the hedgerows, as described previously 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.

Heritage & Archaeology

- 3.53 There are no designated heritage assets within the site. The Grade II heritage assets of Grange Farm, The Beeches and Church of St. Paul are all located to the south of the site and offer opportunities which have informed the concept masterplan, with the creation of a village green to the north of Grange Farm and landscaped areas to the east and west. Green corridors offer the opportunity to retain an early east – west aligned trackway which leads to Grange Farm, along with historic hedgerows within the site. Provision of space for a cemetery extension to the north of the Church of St. Paul safeguards space to the north of that heritage asset.
- 3.54 Further, more detailed, assessment will be carried out as the development framework progresses towards detailed design and pre-application engagement with Historic England will also be undertaken with reference to the designated built heritage assets.

- 3.55 Based on the available information, there are no archaeological constraints to development; further assessment will be carried out as the site moves forward to detailed design.

Access & Accessibility

- 3.56 A number of Public Rights of Way cross the site as illustrated in Figure 04:03, most of which follow the existing field boundaries, save for a diagonal route between the corner of Brewood Road/Grange Farm and School Lane. It is proposed that the latter route is diverted within the proposed green infrastructure network whilst all the other routes are maintained more or less on their current alignments.
- 3.57 An existing cycleway runs along Stafford Road immediately adjacent to the eastern boundary of the site and is illustrated in Figure 04:03 and Photograph 09 below.
- 3.58 The site is located within a 5 minute walk of the local bus stops with two stops adjoining the site, one on Brewood Road and the other on School Lane. The services have been described in the previous chapter.
- 3.59 In terms of vehicular access School Lane offers the best flexibility and visibility between the site and road. A second vehicular access is not needed due to the size and capacity of the site, however an emergency access can be accommodated, if required, between the site and Brewood Road, as illustrated in Figure 04:03.

Noise

- 3.60 Vehicular noise is a potential issue on the Stafford Road boundary. Noise causes a nuisance primarily within rear gardens where residents are attempting to enjoy their outdoor spaces. Therefore, the built form will be set back behind a landscape buffer and turned to front out onto the Stafford Road corridor. This will ensure that the rear gardens are shielded from the road noise and provide a good level of residential amenity to those rear gardens.
- 3.61 Internal noise levels will be minimised by using triple glazing, mechanical ventilation and additional acoustic insulation to the front elevations of properties in close proximity to the eastern boundary.

Residential Amenity

- 3.62 Existing residents who front or back onto the site will be considered in the design and layout of the proposals. Landscape buffers shall be used to create a stand-off from the sensitive boundaries and built form will be set back to ensure minimum overlooking distances are exceeded.

Wider Green Infrastructure Network

- 3.63 The internal green infrastructure network as illustrated in Figure 04:03 shall be retained, as will its connections out to the wider area.
- 3.64 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 05:01 Parameters Masterplan

A Vision for Land at Grange Farm, Coven

- 4.1 Out of this contextual appreciation of place and analysis of the site springs our Vision.
- 4.2 The development of this site will create a new sustainable neighbourhood close to the heart of Coven. The development shall integrate and become part of the existing settlement pattern of the village, whilst also being bounded, enclosed and softened by the retained hedgerows and associated trees.
- 4.3 This new neighbourhood will be part of the wider village, whilst being unique within the setting of the existing landscape in which it sits.
- 4.4 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.
- 4.5 This neighbourhood will be focussed around the Village Streets, Lanes, Greens, Mews and Squares, utilising existing features such as the trees and hedgerows as focal features within them. The Streets, Greens, Mews and Squares shall be enclosed and overlooked by the homes, creating a heart and focus to the neighbourhood.
- 4.6 The neighbourhood would reflect the high quality historic village character of the surrounding area and contain a variety of house types. The fringes of the neighbourhood shall primarily be developed using a range of detached properties, drawing their inspiration from the local vernacular in terms of their layout, design and materials to create a softer and more rural fringe, enabling it to blend and blur into the open countryside.
- 4.7 This organic approach to developing the vision creates a new neighbourhood which works with the grain of the existing landscape and sympathetically overlays development. It will quickly mature and become a part of the setting and character of Coven.

An evolving masterplanning process...

- 4.8 Developing a visionary and unique masterplan, if done correctly, is an iterative process. Initial ideas develop out of the site's own context, constraints and opportunities, as touched upon in the previous chapter.
- 4.9 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

- 4.10 In order to deliver the vision the masterplan must take account of the sites context and constraints and term them into opportunities for use in developing the proposals.
- 4.11 The parameters masterplan illustrated here in Figure 05:01 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.

Landscape Strategy

- 4.12 The development of the layout for this site has taken the existing green infrastructure into account to provide a landscape led residential development set within a substantial landscape framework.
- 4.13 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 Coven and the eastern boundary adjacent to the A449 dual carriageway. Furthermore, it is proposed that a substantial tract of public open space in the form of a village green is located to the north of the site and another in vicinity of Grange Farm. The hedgerow adjacent to the A449 will be enhanced with infill planting and groups of native trees.
- 4.14 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 tree and hedges and integrating these into the development, giving the scheme an immediate sense of maturity;
 - Ensuring the gaps in the existing hedge adjacent to the boundaries and the A449 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;
 - Ornamental and native hedge planting to be planted in and around the proposed development to soften the adverse effects of the built form.
- 4.15 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 Village Greens and general perimeters including areas of public open space.
- 4.16 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

- 4.17 The hard landscape materials palette also reflects the spatial hierarchy and patterns of movement through the development. Village 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.



4.18 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.

Use and Quantum

4.19 The masterplan illustrates residential led development complimenting the surrounding established use mix, set within a Green Infrastructure network. The will include 5.47 hectares of residential development and 3.5 hectares of Green and Blue Infrastructure which will include woodlands, wetlands and grasslands, incorporating naturalistic play areas, cycle routes and nature trails.

4.20 A cemetery extension is proposed to offer much needed expansion space to the Church of St Paul's whose current cemetery is at capacity.

4.21 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 20 homes per hectare up to 40 homes per hectare at its heart. This varied density would roughly equate to a net average of 35 homes per hectare, or a gross density of around 20 homes per hectare.

4.22 Overall around 189 homes can be accommodated on the site, based on the densities above.

Layout and Movement

4.23 The layout has emerged from the earlier constraints and opportunities work as set-out in Chapter 4. Figure 05:01 illustrates how the trees, hedgerows and farm track 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. The primary element is the Street which forms the spine into and through the site.

4.24 Branching from the Street there are a number of Lanes which serve the parcels and is based around traditional Lanes as well as shared surface Lanes and Mews style spaces. Where these routes intersect; raised thresholds, public squares or landscape features will be introduced to aid legibility and reduce traffic speeds.



4.25 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.

Scale, Mix and Massing

4.26 It is proposed that approximately 189 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 more aspirational housing.

4.27 The character of the surrounding neighbourhoods and villages 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 principle junctions, within mews, squares and around key green spaces to aid legibility and enclosure.

4.28 Such taller units will not be used close to boundaries where they would overlook existing dwellings or gardens.

Sustainable Urban Drainage Strategy (SUDs)

4.29 The SUDs is part of the Blue and Green Infrastructure network and has six 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

4.30 In essence 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 06:01 Parameters Masterplan

- 5.1 Bloor Homes is committed to working corroboratively with the Council and other local stakeholders with a view to delivering a high-quality residential scheme at Coven.
- 5.2 A full appreciation of the site has been undertaken in order to inform this Vision Document. We can confirm that there are no technical constraints which would preclude the site coming forward for residential development, direct access is available from the surrounding road network to ensure timely delivery.
- 5.3 The emerging parameters masterplan presented in this document has been informed by the vision and responds to the site analysis which identifies the main constraints and opportunities of the site. The development framework shows how development at Grange Farm, Coven could come forward in order to provide the following key benefits:
- approximately 189 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;
 - a new cemetery extension for St Paul's Church;
 - a development which respects the adjoining neighbours in terms of providing landscape buffers between existing and proposed homes; and
 - a sensitive, high quality green infrastructure network that maintains and improves biodiversity in the area, whilst maintaining much of the existing planting, hedgerows and trees.
- 5.4 The development of the site would result in a sympathetic, sustainable and integrated neighbourhood on the eastern edge of Coven, within a natural infill site and complementing the surrounding village.

“ Grange Farm will create a new sustainable neighbourhood at the heart of Coven. The development shall become part of the existing settlement pattern of the village.

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.

The Streets, Greens, Mews and Squares shall be enclosed and overlooked by the homes, creating a heart and focus to the neighbourhood.

The neighbourhood would reflect the historic village character and contain a choice and variety of homes. The fringes of the neighbourhood shall use a range of detached properties, drawing their inspiration from the local vernacular in terms of their layout, design and materials to create a softer and more rural fringe, enabling it to blend and blur into the open countryside.

This organic approach works with the grain of the existing landscape and sympathetically overlays development. It will quickly mature and become a part of the setting and character of Coven. ” ”

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APPENDIX 3

Transport Technical Note

TECHNICAL NOTE



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Land at Grange Farm, Coven

Job Number: J324057

Date: 26 November 2018

Client: Bloor Homes

Prepared By: IGK

Approved By: JEGB

Highways and Transport Assessment

1 Introduction

- 1.1 mode transport planning (mode) has been commissioned by Bloor Homes Midlands to undertake a highways and transport review of a proposed residential development site located on land to the north of Grange Farm, Coven. The site location is shown in **Figure 1.1** below.

Figure 1.1: Site Location



- 1.2 The draft parameters plan indicates that the site could accommodate c. 190 dwellings.
- 1.3 This Technical Note has been produced to review the emerging masterplan and outline the potential opportunities that the site provides, in terms of access and movement.

2 Site Location

- 2.1 The site is located c.7.5km to the north of Wolverhampton and at the edges of the existing built up area of Coven. It is situated to the west of the A449 and is surrounded by residential areas to the north, west and south with the A449 forming the eastern perimeter of the site.
- 2.2 There is currently only a single agricultural vehicle access to the site via the A449 and two dedicated pedestrian gates to allow access to the footways dissecting the site.

3 Existing Conditions

Local Highway Network

- 3.1 The proposed site has direct frontage access to School Lane, Brewood Road, Light Ash Road and the A449. The site currently however only benefits from an existing vehicle access onto the A449. This is an agricultural gated access with a refuge within the central reservation to accommodate isolated agricultural vehicle movements.
- 3.2 The local highway network is considered in more detail below.

Light Ash Lane

- 3.3 Light Ash Lane is situated to the north of the site and extends between School Lane and the A449. The road is narrow, typically between 2.3m and 3.5m wide and has no centreline markings, it does however have street lights. The road links surrounding roads to the A449 and is currently subject to a 30mph speed limit. The junction between Light Ash Lane and A449 dual carriageway is an all movements junction due to the refuge within the central reservation of the A449 but not advisable to be promoted for the proposed scheme.

School Lane

- 3.4 School Lane broadly runs in a north to south alignment along the western site boundary and extends between the signalised junction with the A449 to the north to Brewood Lane to the south.
- 3.5 The road is subject to a 30mph speed limit with a lower speed of 20mph outside of the school. In the vicinity of the site's frontage, there are school zig zag markings to restrict parking and there are footways on both sides of the carriageway. There is also a pedestrian crossing which forms a build out traffic management measure along the carriageway in the vicinity of the school.

Brewood Road

- 3.6 Brewood Road runs along the southern site boundary extending between School Lane and the A449. Brewood Road has a footway on the northern side of the carriageway only for the section of carriageway that fronts the site. The road has street lighting and subject to a 30mph speed limit.

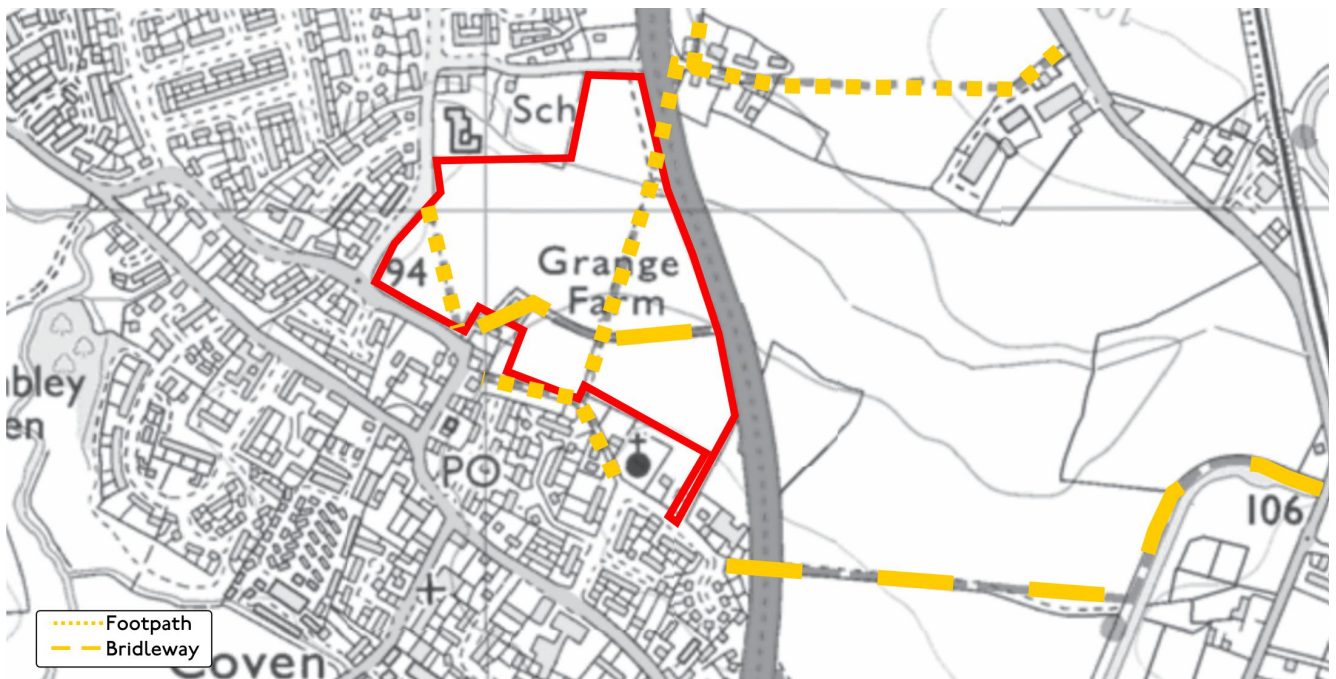
A449

- 3.7 The A449, is a trunk road (maintained by Highways England (HE)) extending between Wolverhampton and M54 to the south to Penkridge and Stafford to the north. The road forms a two-lane dual carriageway and is subject to the national speed limit (70mph). There is an existing agricultural gated access from the site in this location but based on the nature of the A449, HE involvement and speed, an access it not proposed to be taken forward from this location.
- 3.8 No existing traffic flow or speed data is available at this stage on the road links.

Walking and Cycling Routes

- 3.9 A desktop review of existing pedestrian and cycle routes in vicinity of the site was undertaken.
- 3.10 A number of Public Rights of Way (PRoW) cross the site with pedestrian access points taken via School Lane and Brewood Road. An extract of the PRoW network is shown in **Figure 3.1** below. These links would have to be maintained as part of the access strategy of the proposed scheme.

Figure 3.1: PRoW Network



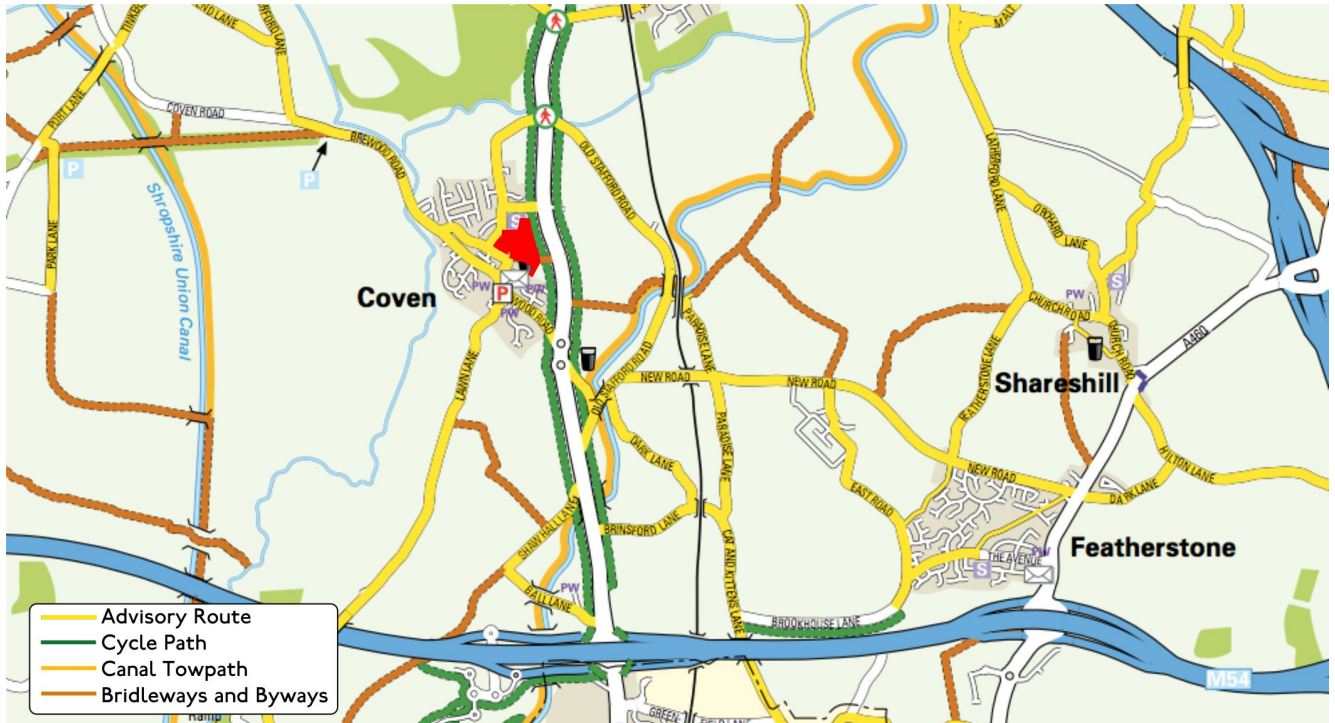
- 3.11 The local centre is located south of the site where there are a number of local facilities including public houses, food and non-food retail and takeaways that can be accessed. All of which are located within a short walk of the site.
- 3.12 In terms of the cycle network, a review of the Staffordshire County Council (SCC) cycle map has been undertaken and an extract is provided below in **Figure 3.2**. There are numerous cycle links, both advisory and dedicated routes, within the site which the proposed development would link into.

Technical Note

Land at Grange Farm, Coven

Highways and Transport Assessment

Figure 3.2: SCC Cycle Network



Public Transport

- 3.13 A review of public transport provision in proximity of the site shows that the nearest existing bus stops are located on School Lane and Brewood Road. These are located within a c. 5-minute walk from the centre of the site.
- 3.14 The stop on School Lane is served by the 54 and 54A bus services which operate between Wolverhampton and Stafford, stopping in Coven and Penkrige. The service operates with a frequency of two services per hour in each direction.
- 3.15 The stop on Brewood Road is served by the 54, 54A, 877 and 878. The 877 runs between Wolverhampton and Stafford, stopping at Brewood and Church Eaton on the way. The service has one bus every 1 – 2 hours, in both directions. The 878 runs between Stafford and Wolverhampton, stopping at Penkrige and Brewood on route. The bus service has one bus per hour, in both directions.

4 Opportunities

Vehicular Access

- 4.1 The emerging masterplan currently shows two vehicular accesses, one via School Lane and the other via Brewood Road. Based on the scale of development (c.190 units), a single vehicle point of access would be sufficient to serve the scheme with the possibility of an emergency access. On similar schemes that we have worked on within Staffordshire, we have agreed with SCC that a single point of access (subject to internal layout) could be sufficient to serve up to 200 dwellings.

Technical Note

Land at Grange Farm, Coven

Highways and Transport Assessment

- 4.2 Unless required by capacity (subject to review of traffic flows), one vehicular access would therefore be sufficient to serve the site. It is recommended that the primary vehicular access is taken from School Lane. This provides the greater area of site frontage with the highway and would avoid any interaction with other minor road junctions.
- 4.3 The current access shown on the masterplan along Brewwood Road may be problematic due to the location of the 90-degree bend of the existing carriageway of Brewwood Road and the junctions spacing of the existing minor arm junctions. These may make site access visibility more difficult to be achieved
- 4.4 The emergency access (if required) could take the form of a shared-use pedestrian/cycle link (3m wide) this would need to be determined at a later date through junction capacity assessments and following traffic surveys. This could be provided either along Brewwood Road or School Lane (at a sufficient distance from the main vehicle access).
- 4.5 It is not advisable to utilise the existing gated access to the site along the A449 or Light Ash Lane due to narrow width of Light Ash Lane and the nature of the A449. A summary is provided in **Figure 3.3** below.

Figure 3.3: Site Access Locations



Sustainable Access

- 4.6 In terms of pedestrian routes, the site will be developed with a focus on prioritising pedestrian activity and cycle movements within the site to encourage non-car modes.
- 4.7 There is opportunity for the site to tie into existing sustainable infrastructure both within the site (PRoW network crossing the site) and the existing footways along School Lane and Brewwood Road. Subject to ownership there is also the potential to provide an additional pedestrian/cycle link from the site via Church Lane.

4.8 Furthermore, there is also an opportunity to provide an east-west cycle route/shared use path across the site, linking Brewood Road and School Lane to the existing cycle route alongside the A449. A PRow will allow a safe and free movement for both the residents and the local community.

5 Constraints (For Internal Purposes)

- Location of the current southern access via Brewood Road due to the junction spacing with existing minor arms and the potential impact on the visibility splay with the horizontal alignment of the carriageway. Based on the number of units this is not needed and could be redesigned to provide a pedestrian/cycle link that also acts as an emergency access if an emergency access is required.
- The frequency of bus services in proximity of the site is poor with frequencies are not ideal – S106 costs may be sought by SCC but scale of development would not warrant diversion or increase of current services.
- The existing junction of Light Ash Lane and the A449 is substandard and SCC may want measures to discourage the use of this link by new residents. This may require a Stopping Up Order (SUO) but can be discussed with SCC in due course.

6 Next Steps

- Review access designs in CAD.
- Review Highway boundary data along frontages.
- Commission ATCs to understand vehicle flows and speeds.