



PLANNING AND DEVELOPMENT CONSULTANTS

**A New Development Strategy for South Staffordshire 2018-2038
The Local Plan Review
Preferred Options - November 2021**

LAND AT REAR OF ST. MARY'S ROW - BREWOOD

Mr A. MORETON & MRS C MORETON – SHELAA Ref. 065

1. I refer to the above consultation and confirm that I act for the owners, as above, of the land identified as site ref. 065 within the Council's SHELAA, wherein it is categorised as "potentially suitable".

2. In general terms, it is considered that the Council's approach continues to place far too much emphasis on the "strategic development locations", most particularly proposals SA2 (Cross Green) and SA3 (Linthouse Lane). It now appears that SA2 only "safeguards" the land for the potential rail-based parkway with no requirement for it to be provided (in contrast to previous Infrastructure Delivery Plan's implicit indications). The release of green belt with assessed "very high" harm in this location appears to have far less justification now in the context of the proposed "infrastructure led" approach. Moreover, these large allocations put the delivery of a large part of the new housing requirement firmly in the hands of the larger developers, who will consequently potentially dictate supply. It is considered that the strategy should instead seek to deliver more growth around the edges of settlements in locations which are already sustainable and deliverable, such as in Brewood.

3. In addition, it is noted that the proposed strategy does not allow for any new safeguarded areas of land. In accordance with paragraph 140 of the NPPF, the strategy should provide for further Green Belt release will be required beyond 2038 to meet future development requirements to meet needs. Safeguarded land should continue to be identified within the higher Tier settlements, including Brewood.
4. In relation to the specifics of my client's land, it is noted that the site has not been considered because it is assessed now as "Too small to be likely to deliver affordable housing". Such a statement presumably relies upon the Council's assumption about the site's capacity in the SHELAA assessment. The site, however, could deliver affordable housing based upon different assumptions.
5. Although, because of the above, the site has not been assessed in detail by the Council, it is noted that the Green Belt Assessment concludes that the release of land in this Parcel (S32B) would result in "high-moderate" harm. However, my client's land is clearly distinguishable from the remaining 77+ has., within the Parcel concerned, by the fact that it is contained by existing built development to the north, south and east and by physical features to the west. Any harm to the Green Belt from built development on my clients' land will be negligible.
6. Regarding landscape sensitivity, it is also noted that the Landscape Sensitivity Assessment (Area Ref. SL76s1) rates this as "Moderate – High". However, as above my client's land is clearly distinguishable from the remaining 94 has., within the Parcel concerned, by the fact that it is contained by existing built development to the north, south and east and by physical features to the west. Any visual harm from built development on my clients' land will be negligible.

7. Most particularly, the land parcel “fits” the NPPF requirement (para. 69) to accommodate at least 10% of the housing requirement on sites no larger than 1 hectare. Such sites are assessed in the above as making an important contribution to meeting housing requirements and are “..often built-out relatively quickly..”.

8. From the published documentation, the concentration on strategic sites to meet housing needs, is unlikely to meet the requirement for smaller sites. Such sites are most likely to occur adjacent to existing villages such as my clients’ land parcel. Moreover, this site has distinguishable boundaries; lies opposite the doctor’s surgery and is adjoined by the grounds of a primary school and also has good pedestrian links to the village centre. It has much to commend it in these terms compared to some sites that the Council has currently allocated to meet para. 69 of the NPPF elsewhere in the District - site proposals 272 and 576 in Kinver and site proposals 379 and 610 in Wheaton Aston are examples.

9. My clients, therefore, consider that this land should be allocated for future housing development in the Review or, at the very least, identified as “safeguarded”, particularly in view of how it “reads” as part of the village; the minimal harm to Green Belt considerations that would result from built development, its limited visual sensitivity and sustainability credentials.