



SOUTH STAFFORDSHIRE COUNCIL PREFERRED OPTIONS CONSULTATION NOV/DEC 2021

REPRESENTATION

in respect of
Land at Westbeech Road, Pattingham
on behalf of

CCB INVESTMENTS

13 December 2021
Client Reference: RCA569ap
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1. INTRODUCTION

- 1.1. This is a representation made on behalf of CCB Investments in respect of a site at Westbeech Road, Pattingham.
- 1.2. The representation relates to the South Staffordshire Council Local Plan Review, which has reached the Preferred Options stage. The consultation is ongoing and ends on 13th December 2021.
- 1.3. We have considered the Development Plan as it now stands and have also considered the policies being proposed in the emerging local plan. We do not respond to all sections of the emerging plan, only those which we currently consider relevant. These views are without prejudice to future submissions or hearing statements, which may be made in advance of the Examination stages.

Structure

- 1.4. The response makes comments on the following paragraphs and policies, we end with further information regarding our site on Land at Westbeech Road, Pattingham Road:

Paragraph	Policy
	Strategic Objective 1
	Strategic Objective 2
	Strategic Objective 9
	DS1
	DS2
4.7	
	DS3
	SA2
	SA5
	HC1
	HC3
	HC4
	HC6
	HC7
	HC9
	HC11
	HC14

	HC17
	HC19

2. Representation

Summary

- 2.1. The Council identified the preferred spatial strategy for distributing growth in the Spatial Housing Strategy and Infrastructure Delivery Plan (October 2019) (SHSIDP). The Plan has been prepared to provide a level of housing growth which would meet South Staffordshire's housing needs plus a 4000-home contribution towards the unmet needs of the wider Greater Birmingham Housing Market Area. Option G from the SHSIDP has been identified as the preferred option, which is infrastructure-led development with a garden village area of search beyond the plan period. We do not consider that sufficient information has been provided on the calculation and distribution of the 4000-home figure to be able to comment on the suitability of the preferred strategy or the supporting Infrastructure Delivery Plan (IDP).
- 2.2. We are concerned that focussing the majority of growth on large strategic sites that are reliant on the delivery of infrastructure could lead to delayed delivery of numbers in the plan. For resilience and flexibility, we consider that a greater number of smaller sites should be allocated.

Strategic Objective 1

- 2.3. This Objective states that where Green Belt release is necessary, there will be a mechanism in place to secure compensatory improvements. We are concerned that, given the stage of the plan review, this is not substantiated in any further detail, and it is unclear how the Council intends for this to be delivered. Whilst improving environmental quality and access would be a positive objective, it is unlikely that a developer would have access to another parcel of land to improve and as much of the Green Belt will be in private ownership (such as agricultural land), securing contributions to improve that land is likely to be unlawful. We do not consider this objective to be deliverable.

Strategic Objective 2

- 2.4. We support this Objective which seeks to meet the needs of the district whilst making a proportionate contribution to the needs of the Greater Birmingham Housing Market Area (HMA). However, it is unclear how this contribution is disaggregated to each Authority within the HMA, so we suggest greater clarity is provided in the plan to give more confidence and clarity in the Plan. Details of any agreements made under the Duty to Co-operate or in Memoranda of Understanding or Statements of Common Ground should be included in the Evidence Base.

Strategic Objective 9

- 2.5. The Council's preferred spatial strategy for growth was option G, which was for an Infrastructure-led spatial housing strategy. This strategy relies on new train stations, but rail is not mentioned within the objective. We suggest this Objective therefore requires amending.
- 2.6. Further the importance placed on rail links set out in Option G does not translate into some of the sites selected.

Policy DSI Green Belt

- 2.7. Firstly, we consider that this policy largely repeats the Framework, and to simplify the plan, could be – in part – removed, and replaced to refer the reader to the Framework instead.
- 2.8. The accompanying text again refers to “compensatory improvements to the environmental quality and accessibility of remaining Green Belt, including improving access to the countryside

and ecological and biodiversity enhancement, are made". However, as stated previously, the way in which this would be delivered has not been defined and creates uncertainty for landowners and developers. It is unclear what is meant by "remaining Green Belt", because whilst it might be feasible to provide high quality, on-site green infrastructure, and open space (within the confines of other policies), if the improvement is made 'on-site', it will have been removed from the Green Belt as part of this Plan. If the intention is to improve Green Belt land unrelated to this site, then a contribution would not meet the tests required. It is notable that the Plan refers to the idea of compensation on several occasions, but it is not mentioned within the policy itself.

- 2.9. The policy also states that "Development within the Green Belt must retain its character and openness". This statement would appear contradictory, and it is unclear how this could be achieved in practice. Development will inevitably have an impact on openness, so the policy wording as it stands appears impracticable and undeliverable.
- 2.10. We would encourage the Council to demonstrate that they have met the exceptional circumstances required to remove sites from the Green Belt. Whilst we are not suggesting that these have not been met, this is likely to be important at the examination to demonstrate why Green Belt releases have been chosen above some non-Green Belt sites.

Policy DS2 Open Countryside

- 2.11. It is not clear from the wording of proposed policy DS2 what types of development would or would not be acceptable in open countryside. We believe this should be revisited.

Housing Supportive Text (Paragraphs 4.6 to 4.20)

- 2.12. We consider that in light of known worsening housing affordability during the pandemic that the plan should be revisited when the ONS house price to earnings data is updated in March 2022.
- 2.13. The relative proportion of reserve sites (1,608) against the provision of housing overall (5,348) seems high. Whilst we accept the need for reserve sites which reduce the need for a continuously reactive reassessment of green belt boundaries in future, one must conclude that such a high proportion of reserve sites is surely less 'plan led' as a result. The same applies to the windfall allowance, which we also consider to be excessive.
- 2.14. Table 8 of the PO Local Plan seems to include safeguarded land as contributing to the overall OAN and is not included as additional land 'above and beyond' their requirement. The role of safeguarded land in the Green Belt is fairly straightforward: it provides flexibility during plan reviews where 5 year supply dips, or there are other problems with delivery. To that end the contribution safeguarded land makes to the current OAN figure should be little to none, with safeguarded sites included that are above and beyond the OAN figure. This would take account of their intended long term permanence and endurance beyond the Plan period, in combination with the requirement at NPPF 143(e) that green belt boundaries should not need to be altered at the end of the Plan period.
- 2.15. If the focus of green belt release in the emerging Plan is solely that needed to meet the emerging Plan requirements, then future planned development needs will necessitate further green belt releases. We consider it would be more appropriate, both for effective and positive preparation of the emerging Local Plan and to ensure that green belt boundary review is not an ongoing iterative process running alongside Plan preparation on each occasion, to seek to secure sufficient land release to meet anticipated future needs beyond the Plan period. This would be more aligned to the need to plan positively.

Policy DS3 – The Spatial Strategy to 2038

- 2.16. There is some confusion here whether the new development is being built to address previous infrastructure issues and the extent to which this will address and accommodate new development. Is the proposed growth reliant on new infrastructure, or being proposed as a mechanism to deliver new infrastructure to address existing deficiencies? We are concerned that existing sustainable settlements are not receiving allocations and growth is instead being focussed on large allocations in seemingly rather less sustainable locations that will be reliant on largescale infrastructure delivery to make them sustainable.
- 2.17. The third paragraph states that the priority is “to ensure that growth is distributed to the district’s most sustainable locations, avoiding a disproportionate level of growth in the district’s less sustainable settlements”. But if this is the case, this would not appear to relate well to the proposals to allocate large Urban Extensions which are so large, they will require their own infrastructure. This appears to be generic and does not relate well to the settlements such as Pattingham , which is a sustainable location subject to very limited growth. This is one of the most unaffordable areas of the Borough and proportionate growth and the attendant improvement in housing choice appears not to have been factored into the decision-taking here.
- 2.18. We note that policy DS3 indicates that ‘Land at Cross Green’ is put forward and is anticipated to deliver a large scale housing development of 1200 dwellings. Within Policy DS3, it is stated that ‘the Council will continue to work with partners to seek opportunities to deliver’ this, however provides little explanation to how the site will be delivered, and therefore we do not consider there to be sufficient certainty regarding the deliverability of these proposals.
- 2.19. In relation to policy DS4 – we have a small observation in relation to this policy is why it is included when it applies to a time period outside of the scope of the plan. Why not extend the plan period instead?

Policy SA2 - Strategic development location: Land at Cross Green

- 2.20. Policy SA2 sets out the context of the site allocation at Cross Green. We note in this policy that the justification of allocating this site is heavily reliant on the ‘Land at Cross Green SPD’, which has not yet been published and is claimed to be adopted in the ‘early years of the plan period’. The policy’s objectives for the site are ambiguous as they do not carry any weight to guarantee the site’s delivery.
- 2.21. The heavy reliance on a pending SPD does not provide certainty that the site is deliverable and there is currently no clear justification provided which demonstrates that this allocation can be implemented. With no clear timeline of when this site can be delivered, we consider that the council should look to allocate further sites to ensure that they are still able to meet the housing target of 8,881 dwellings over the plan period.

Policy SA5 - Housing Allocations

- 2.22. Policy SA5 sets out the housing allocations included within the preferred options document.
- 2.23. There are two allocations at Pattingham (site 251 and site 255).

Settlement	Site reference number	Use	Site Location	Minimum Capacity (dwellings)
Pattingham	255	Residential	Land at Moor Lane	22
Pattingham	251	Residential	Hall End Farm	17

2.24. This representation assesses these proposed allocations in detail later in this document.

Policy HC1 – Housing Mix

2.25. This policy states that market housing will need to provide 75% of the development as 3-bed dwellings or smaller. This policy could be more flexible where it would allow for different approaches to phased development and other development outside of the scope of the plan, including rural exception sites.

Policy HC3 – Affordable Housing

2.26. It is unfortunate that flexibility has not been afforded in respect of the affordable housing tenure mix. We consider that this policy should be amended to avoid it being fixed, so that other evidence (such as that provided by Registered Providers or through housing needs assessments for individual parishes) and the SHMA can be considered. The Plan also seems to suggest that this could therefore not be reviewed until the Plan itself is reviewed in more than 5 years' time.

2.27. This Policy comments on the desirability of 'pepper potting', but to provide greater clarity for applicants, this should be quantified. For example, including a statement such as "unless the application is for entirely affordable housing, clusters of approximately 9 dwellings or less, should be used", would assist.

2.28. The policy contains a suggestion that the Council will not support forms of grant funding, it is not clear what is meant by this and should be removed as it relates to the policies of third party grant providers (such as Homes England) which are outside the control of the Local Plan.

2.29. When discussing potential offsite/financial contributions, this should be clarified by stating that this will be subject to viability/market evidence.

2.30. It is suggested that the final bullet point be removed. It is unclear on what basis the Council could assume that all policy compliant developments will be viable, this risks failing to take into account the nuances of site specific circumstances.

Policy HC4 – Homes for Older People

2.31. The requirement for 30% of all market and affordable homes to meet Building Regulations Standard Part M4(2), in addition for the requirement for all homes to meet Nationally Described Space Standards, is unnecessary burdensome on developers. What is the justification for 30%? What is the justification for both standards being required? The land-take for a dwelling to meet both NDSS and M4(2) can be high and can lead to dwellings that are of a floor area that takes them above local affordable housing price thresholds and local market price levels. It can also lead to an inefficient use of land.

Policy HC6 – Rural Exception Sites

- 2.32. This policy accepts that a small amount of market housing would be permitted in proposals outside of the Green Belt where essential to the viability of the scheme. Whilst we generally support this policy, we are unclear why this is only something permissible outside the Green Belt, since being within or outside the Green Belt will have no impact on the viability of the scheme. Given that the vast majority of South Staffordshire is within the Green Belt, this is a sweeping restriction that appears to lack clear justification.
- 2.33. There have been a small number of Green Belt exception sites that have been supported by S78 appeal inspectors, such as Shop Lane, Oaken – because they were aligned to the provisions within the NPPF. Why therefore would this local plan take a different approach? We do not consider this is consistent with national policy.

Policy HC7 – Self & Custom Built Housing

- 2.34. The requirement to put Self Build dwelling plots on all major developments is onerous and the policy provides no certainty in terms of the level of provision, providing no reassurance to the Council, developers, or would-be self-builders. Providing self-build dwellings within a wider development provides significant health and safety concerns, introducing potential new contractors.
- 2.35. In addition, this policy does not recognise that self and custom builders are very unlikely to want to position themselves within a volume housebuilder site, so the uptake of these plots is likely to be poor. We consider that it would be a far better policy to allocate small plots to meet this need instead.

Policy HC9 – Design Requirements

- 2.36. Whilst the majority of this policy is supported, we do have concern about the requirement for ‘Tree lined streets’. Whilst it is appreciated that this is a national requirement, it should be the role of the Local Plan to put ‘meat on the bone’ in terms of how this should be implemented. We would also question whether this has been discussed with the highways adoptions team.
- 2.37. Developers are also likely to have to contribute towards exorbitant maintenance fees, which will need to be factored into the plan viability. There should also be guidance in terms of which streets will be expected to be tree lined, and an appreciation for circumstances where this may not be appropriate because it is out of character, for example.
- 2.38. The policy introduces a requirement for a Design and Access Statement (DAS) to be submitted with every application. This seems onerous and would add unnecessary costs for householders proposing very minor applications, where the DAS is likely to add very little value in any event.

Policy HC11 – Space about dwellings and internal space standards

- 2.39. We suggest that some flexibility is added to this wording policy, perhaps to suggest that *most* development *should* meet NDSS. Affordable Housing providers do not want NDSS in some areas as the floor area can take them above local affordable housing price thresholds. The same can also be true for market homes, which can price out first time buyers. It can also lead to inefficient use of land and, depending on the mix (particularly in light of the policies proposed by this Plan to focus on homes with lower numbers of bedrooms), can make it challenging to achieve 35dph. This can also ultimately threaten site viability and therefore, deliverability.

These policies should be amended to reflect the fact that new development should not be solving existing problems. Policy HC17 – Open Space

- 2.40. This policy creates a requirement for play provision to be provided automatically in all areas of development associated public open space. This would seem disproportionate, particularly for smaller sites and those in proximity to existing play facilities. This requires amendment or further justification. Provision should also relate to bed spaces and not number of units, to be proportionate. Proposed requirements for open space to be centrally located and contain play equipment should also be omitted, as the suitability and requirements for the open space should be assessed on a site specific basis, taking into account the site constraints and existing local provision.

Policy HC19 – Wider green infrastructure design principles

- 2.41. Whilst we support the need for good quality green infrastructure, the information provided within this policy is vague for such an advanced stage, this should be substantiated within the emerging local plan, rather than left for an SPD which may not be produced for some time.
- 2.42. We would also like further clarity as to whether provision of Open Space (HC17) and Sports Facilities and Playing Pitches (HC18) would qualify as green infrastructure within this policy. If not, this would represent an unduly onerous set infrastructure requirements.

Policy NB5 - Renewable and low carbon energy generation

- 2.43. Whilst the aims of this policy are clearly laudable, the omission of energy storage as a strategic policy is something that requires addressing in the local plan. Energy storage is crucial in the transition towards renewable forms of energy generation, because unlike fossil fuelled power stations which can be turned on and off like a tap, the way renewable energy is generated can rarely be controlled; it is intermittent and unpredictable.
- 2.44. With battery technology, energy can be stored during times of high production, and then discharged when demand is at its peak, when the grid becomes strained. This becomes even more important because the peaks and troughs of renewable energy generation and energy demand do not overlap when using renewable sources, so this is a crucial way of balancing the grid.
- 2.45. The importance of energy storage has been recognised by National Government in recent years, as battery storage technologies have advanced and become more viable. If electric car charging points and a move away from the use of gas in domestic settings happens in the short term, national grid capacity must be increased and this local plan should have a policy to cover this.

Policy NB7 - Managing flood risk, sustainable drainage systems & water quality

- 2.46. National policy dictates that a Flood Risk Assessment (FRA) should be provided for all development in Flood Zone 2 and 3, and on sites over 1ha in Flood Zone 1 (see footnote 55 of the Framework¹). Therefore, it is unclear why this policy is seeking to request an FRA on all major sites. Whilst we would agree to the provision of a drainage strategy on all major sites, we disagree with an automatic requirement for a FRA. This would appear another onerous requirement.

¹ [National Planning Policy Framework \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk)

2.47. We agree with the importance placed on providing SuDS, but we disagree that all major developments should provide them. Brownfield sites, for example, may struggle with this requirement and risks stymieing the drive towards any 'brownfield first' approach.

3. THE SITE AND PROPOSALS: LAND AT WESTBEECH ROAD, PATTINGHAM (SITE REF: 253)

- 3.1. The site is located to the east of Westbeech Road in Pattingham, Staffordshire. The parcel of land extends to approximately 4.39ha and is bound to the north and east by open agricultural fields, to the south allotments and to the west by existing residential development along Westbeech Road and College Farm Close.
- 3.2. The site includes a bungalow and its curtilage, a rear access road, and various fishing pools and associated land. The site cannot be seen from the adopted highway.
- 3.3. The location plan is shown below:



- 3.4. The site is centrally located within the village and therefore benefits from being located opposite the local park and 250m away from a bus stop that travels frequently to Wolverhampton town centre.
- 3.5. The site is also within 300m of the village centre, providing access to a range of services including a primary school, convenience store, public houses, restaurants, shops and a pharmacy. All of the above facilities can be accessed on foot via the existing public footpaths.
- 3.6. The site falls entirely within Flood Zones 1 and has a very low risk of surface water (pluvial) flooding. There are no nearby designated heritage assets within the locality of the site.
- 3.7. The site is situated within the administrative areas of South Staffordshire and is currently designated as Green Belt land.
- 3.8. The site would achieve sustainable development without the need for major infrastructure investment and without the need to phase delivery. The site could deliver a residential development combined with a much needed new medical centre to serve the village and the wider community.

- 3.9. The site has been and will continue to be promoted through the Local Plan Review in order to allocated the site for development and remove it from the Green Belt.
- 3.10. The plan below shows that the site sits within the logical village boundary and extends no further than the existing built form line along Wolverhampton Road.



- 3.11. Whilst we note the Green Belt value of the site, it is clear that the proposals will not protrude further into the Green Belt than the existing built form line shown above. Furthermore, there is existing housing located along Wolverhampton Road demonstrating built form within this area of the Green Belt. The proposals will not result in a coalescence between Pattingham and Wolverhampton.
- 3.12. The site owners are in negotiations with a local GP practice to accommodate a new, purpose-built Medical Centre for Pattingham. An agreement in principle has been reached between both parties. The site owners are happy to allocate a suitable parcel of land at this stage for a Medical Practice in the future. The site offers a central location for the new medical centre, which will be accessible by many existing residents of the village and wider rural hinterland. In addition, and due to the proximity of the bus stop, staff working in the medical practise will not be dependant on the car to reach their place of work.
- 3.13. Currently, residents of Pattingham have to drive 5 miles to the nearest medical centre located at Claverley. The proposed medical centre would remove this reliance on the motor vehicle whilst also being located 250m form the nearest bus stop enabling residents from further afield to travel sustainably to it.

- 3.14. The site is available now and can be readily delivered within the early stages of the emerging plan period. It is acknowledged that the site is within the West Midlands Metropolitan Green Belt and work is ongoing to assess it within the context of the Green Belt in this location. It is anticipated that the site would be fully constructed within a period of two years of planning permission being granted. The site is viable and can deliver and support the required infrastructure to meet the needs of existing and proposed residents. This will include affordable housing and open space, in addition to planning obligations required to be facilitated to improve local infrastructure.
- 3.15. We have previously submitted a Vision Document and a pre application advice request to the Council which is appended to this representation for convenience.
- 3.16. **The site has not been included as an allocation within preferred options and we strongly object to this.**
- 3.17. The South Staffs Housing Site Selection Topic Paper (appendix 3) provides reasoning for the site's omission. The document states that:
- "The site provides an opportunity to deliver some of the growth identified for Pattingham in the Spatial Housing Strategy and Infrastructure Delivery Plan (2019) consultation.*
- A part of the site would have the capacity to deliver a small site, contributing towards the Council's requirement to deliver at least 10% of our housing requirement on sites no larger than one hectare. This settlement was identified for housing growth on small sites in the Spatial Housing Strategy and Infrastructure Delivery Plan (2019).*
- The site does not appear to have footway access into the wider village*
- There are insufficient non-Green Belt opportunities to deliver the infrastructure led strategy identified for Pattingham. Additional growth is required above the existing levels of safeguarded land in the settlement"*
- 3.18. The site lies adjacent to the settlement boundary of Pattingham. There is an existing footpath leading to the village located on College Farm Close and Westbeech Road.
- 3.19. The documents also states "Regular shaped site offers good permeability providing greater opportunity for good scheme design". However, the document does state that there would be "moderate-high" harm to the Green Belt on the majority of the site, with a small section of the site only having moderate harm. The document states there would be moderate harm to landscape.
- 3.20. The boundaries of the site will ensure continued endurance of boundaries to the Green Belt. They will be enhanced by additional landscaping and tree planting enhancing its rural edge.
- 3.21. A multi-functional hierarchy of green infrastructure will be provided throughout the site adding to ecological biodiversity and connection to the wider open countryside. Enhanced landscaping will be provided within the site to ensure its natural characteristics are not lost through the proposed development.
- 3.22. The site is capable of mitigating harm to the Green Belt and landscape by an appropriate landscaping strategy. The site is well contained and connected to the village.
- 3.23. The Sustainability Appraisal found that the site was a "best performing housing option for biodiversity and geodiversity". The appraisal also concluded the following:

- Site 253 is located within the target distance to a bus stop on Wolverhampton Road, providing regular services. The proposed development at this site would be likely to have a minor positive impact on site end users' access to bus services.
- well connected to the existing footpath network. The proposed development at these four sites would be expected to have a minor positive impact on site end users' opportunities to travel by foot.
- located within the target distance to a convenience store

3.24. It is clear that the site is in a sustainable location and provides an opportunity for significant biodiversity net gain. A landscape strategy can help to mitigate the perceived landscape and Green Belt harm.

Site summary:

3.25. Site 253 is in a highly sustainable location with public transport links and an existing footpath leading to the village centre.

3.26. A proposal for development at this site would result in little to no impact with regards to infrastructure requirement and would be very much in line with the strategy set out within the Preferred options document.

3.27. Whilst a proposal would result in harm to the openness of the Green Belt, this would be minor as the site does not protrude any further than the existing development line of Pattingham and will therefore not result in any coalescence of Pattingham and Wolverhampton. In addition, the existing boundary trees provide a clear and defined boundary which would act as the new village boundary.

Assessment of new allocation – Site 255 (Land off Moor Lane):

3.28. This site is located within the Green Belt, adjacent to the settlement boundary of Pattingham. The site is visible from Moor Lane.

3.29. The Sustainability Appraisal found the following:

- Grade II listed building - located approximately 50m from 'Number 69 with Dwarf Walls, railings and gate to front garden' and 'Farm Buildings immediately north of Number 69'.
- located wholly or partially outside the target distance to a bus stop providing regular services. Therefore, the proposed development at this site could potentially have a minor negative impact on site end users' access to bus services.
- poor access to the surrounding footpath network. The proposed development at this site could potentially have a minor negative impact on local accessibility.
- There is a small cluster of TPOs on the northern boundary of the site.
- Highways - OK subject to an appropriate access with adequate visibility and new footway fronting the site off Moor Lane

3.30. The site is 613m from the village centre which is over 50% further than site 253 is to the village centre. Site 255 is also 600m from the nearest bus stop, which is also 300m further than site 253.

3.31. Development in this location would result in an isolated community who would be very much reliant on the private motor vehicle to meet their day to day needs. Therefore, the site is in a far less sustainable location when compared to site 253.

- 3.32. The Local Plan strategy sets out to decrease car use and for sites not to be reliant on providing new infrastructure. This proposed allocation goes against this strategy.
- 3.33. The preferred options document states a new access is required via Moor Lane. Moor Lane is a category B road. The image below shows the road and the poor visibility splays from the site.



- 3.34. The site is not in a sustainable location in comparison to site 253 and has the potential for adverse impact on the setting of a grade II listed building. The preferred options document states there would be moderate harm to the green belt and moderate harm to the landscape. However, the site is not as well screened when compared to site 253 and the topography of site 255 makes it more visible from Moor Lane.
- 3.35. Residents at this site will be heavily dependent on the private motor vehicle and will have to drive into the village to meet their day to day needs. The site's location will lead to an isolated community with little or no integration into the existing village.

Assessment of allocation on existing safeguard land – Site 251 (Land at Hall Lane)

- 3.36. The site is not within the Green Belt and is located adjacent to the settlement boundary.
- 3.37. The site proforma within the preferred options documents sets out that:
- Major negative effects are predicted against the landscape criteria, although this applies to the Green Belt area of the adjacent site
 - The site does not appear to have footway access into the wider village.
 - This site is safeguarded land and therefore sequentially preferable to Green Belt sites. However, there are insufficient non-Green Belt opportunities to deliver the infrastructure-led strategy identified for Pattingham. Additional growth is required above the existing levels of safeguarded land and allocations in the settlement.
 - located approximately 600m from this ancient woodland. The proposed development at this site could potentially have a minor negative impact on this ancient woodland, due to an increased risk of disturbance.

- assessed as being within an area of ‘moderate’ landscape sensitivity.
- located in close proximity to several PRoWs. The proposed development at this site could potentially alter the views experienced by users of these footpaths. As a result, a minor negative impact on the local landscape would be expected.
- Located 40m from Conservation Area
- Located within an area of medium historic value
- located wholly or partially outside the target distance to a bus stop providing regular services. Therefore, the proposed development at these nine sites could potentially have a minor negative impact on site end users’ access to bus services.

3.38. Whilst the site is not located within the Green Belt, the location of the site is questionable when focussing on the locational sustainability of the site. The site also has a greater impact on heritage assets than site 253.

Conclusion

- 3.39. Site 253 is by far the most sustainably located site put forward in the Local Plan Review for Pattingham. The existing footpath network in Pattingham means that this site will need little infrastructure upgrades fully in line with the aims of the local authorities Preferred Strategy.
- 3.40. In addition, Site 253 is the only proposed allocation that can deliver a new Medical Centre for Pattingham. This highly sustainable location is ideal for patients and staff alike and when assessed over the full plan period must be given considerable weight if indeed the plan seeks to minimise the pressure on existing infrastructure and reduce the dependence on private vehicles.
- 3.41. The new allocation site (255) is in a far more prominent position in landscape and Green Belt terms. Site 253 is well screened, offers greater biodiversity net gain opportunities, as well as the ability to provide 76 homes (at a density of 17 dwellings per hectare), including much needed affordable homes.
- 3.42. There would also be a multi-functional hierarchy of green infrastructure to be provided as part of any proposal. This will include spaces for recreation, formal play, attenuation and ecological enhancements. Healthy lifestyles will be promoted through the open space being located on the doorstep for the majority of dwellings with access to the informal pedestrian routes.
- 3.43. Site 253 gives the local authority an ideal opportunity to allocate a highly sustainable site. A site that will become truly integrated into the local community and one that will give future residents the opportunity to reduce significant dependence on private vehicles. It also provides the village with a sustainably located, purpose built new medical centre to cater for the growing needs of the village and the surrounding area. Any impact on the Green Belt is minimal as the site does not extend further than the existing built up boundary to the east of the village. The existing trees along the eastern boundary of the site will provide a clear settlement end thus providing a stronger and more robust Green Belt. Allocating 253 reinforces the local authorities overall strategy and should be allocated in this local plan review.

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