



Regulation 19 Representation – Hockerhill Farm, Brewood

For: Boningale Homes Ltd

Report No. MAN.710.003.PL.R.002



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Local Plan Review Regulation 19 Representation Hockerhill Farm, Kiddemore Green Road, Brewood

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For:	Boningle Homes Ltd.
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1.0 Introduction

1.1 Introduction

1.1.1 This representation to the South Staffordshire Local Plan Review Regulation 19 consultation has been prepared by Enzygo Ltd. on behalf of Boningale Homes Ltd. Boningale Homes have different land interests across the South Staffordshire District.

1.1.2 This representation contains information relating to the following land parcel:

- BH026 Hockerhill Farm (SHELAA Site Reference Site 075 & 075a)

2.0 Site Context

2.1 Site Location

2.1.1 The site is located in a parcel of land, south of Kiddemore Green Road, nr. Postcode ST19 9BQ. The site is located at grid reference X: 387724 Y: 308665 (see Figure 1 below for site location).



Figure 1: Site Location (site denoted by red line)

3.0 Site Characteristics

3.1 Flood Risk

3.1.1 The site is located within Flood Zone 1 (low risk of fluvial flooding) as illustrated in the Environment Agency’s online flood map records (see Figure 2). The majority of the site is not at risk of surface water flooding (see Figure 3). A small portion of the site, in the southern extent, is identified as being at low risk of surface water flooding.

3.1.2 There are no known drainage constraints which would form insurmountable barriers to the delivery of this site subject to detailed design and consideration of infrastructure capacity.

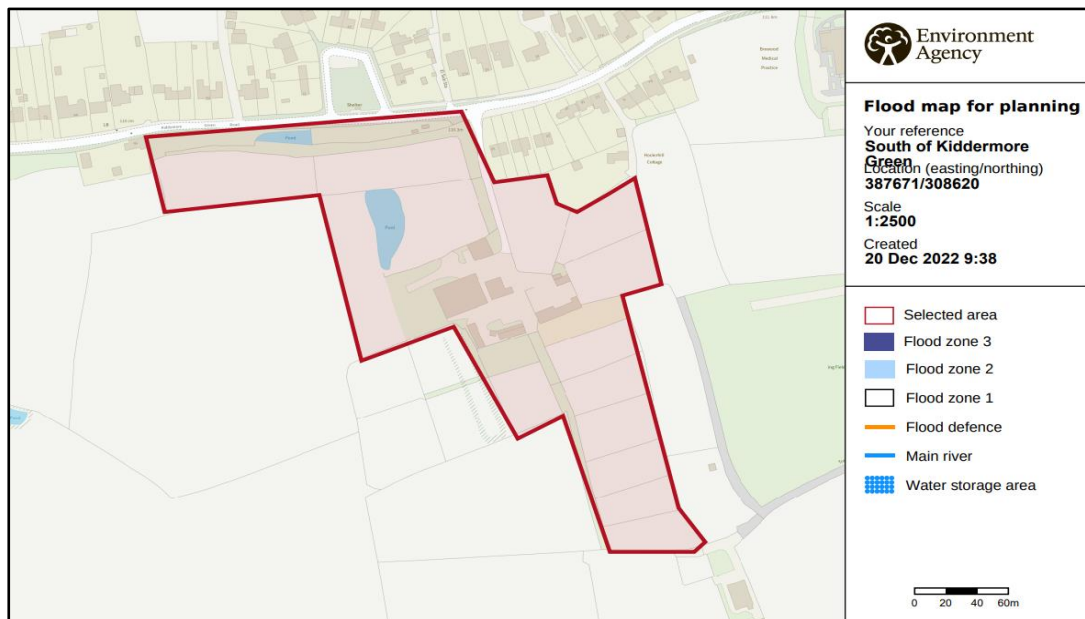


Figure 2: Environment Agency Flood Risk Map (Rivers and Sea)

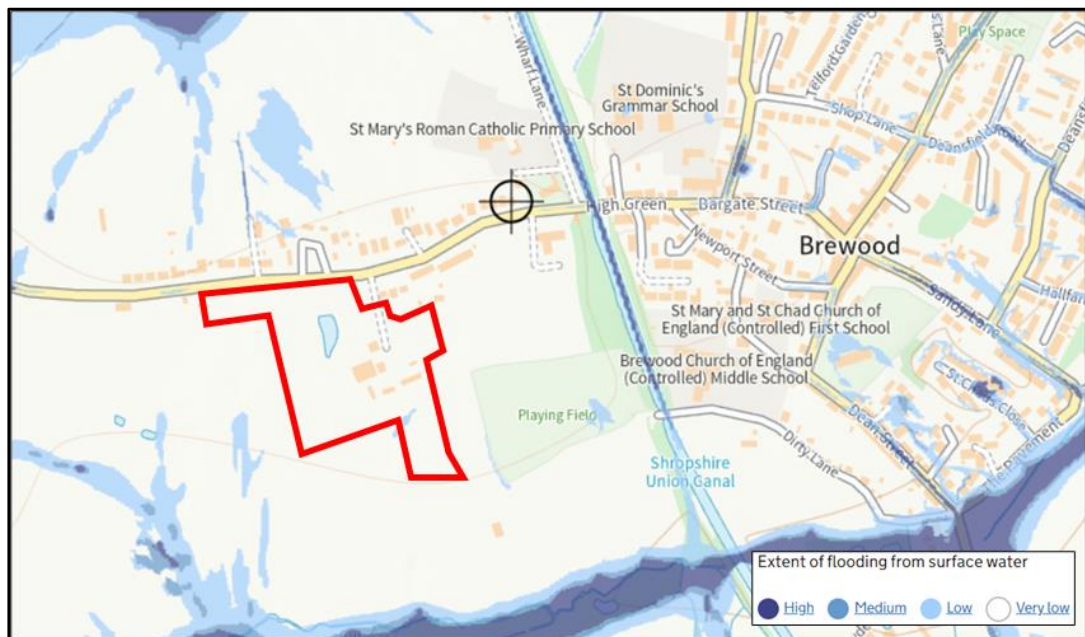


Figure 3: Environment Agency Surface Water Flood Risk Map

3.2 Ecology

3.2.1 There are no statutory ecological designations within the site boundary (Figure 4). The closest statutory ecological designations to the site are:

- Big Hyde Rough (SSSI) – approximately 0.9 km west of the site; and
- Belvide Reservoir (SSSI) – approximately 1.2km to the west of the site.

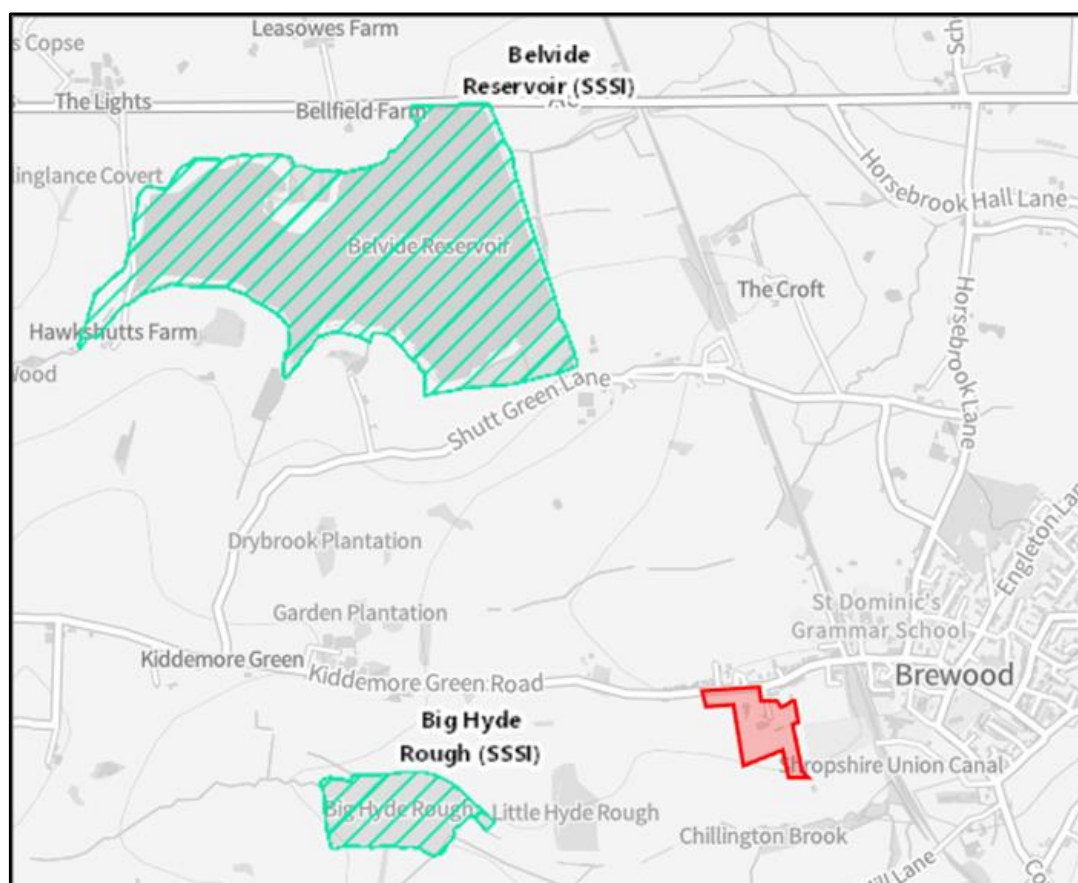


Figure 4: DEFRA Magic Map Extract of Ecological Designations

3.3 Heritage

3.3.1 The site is not within a Conservation Area. There are no listed buildings or other defined heritage assets within the boundary however, there are approximately 70 listed buildings within a 1km buffer of the site (see Figure 5).

3.3.2 The listed buildings closest to the site are:

- Presbytery Approx. 50 yards north west of Roman Catholic Church of St Mary (Grade II) – approx. approx. 0.16km northeast of the site;
- St Mary's Roman Catholic Primary School and Schoolhouse (Grade II) – approx. 0.21km northeast of the site;

- Roman Catholic Church of St Mary (Grade II) – approx. 0.17km northeast of the site; and
- Church Hall Approx. 1 yard northeast of Roman Catholic Church of St Mary (Grade II) – approx. 0.2km northeast of the site.

3.3.3 The Chillington (Grade II* Registered Park & Garden) lies approx. 1.4km south of the site.

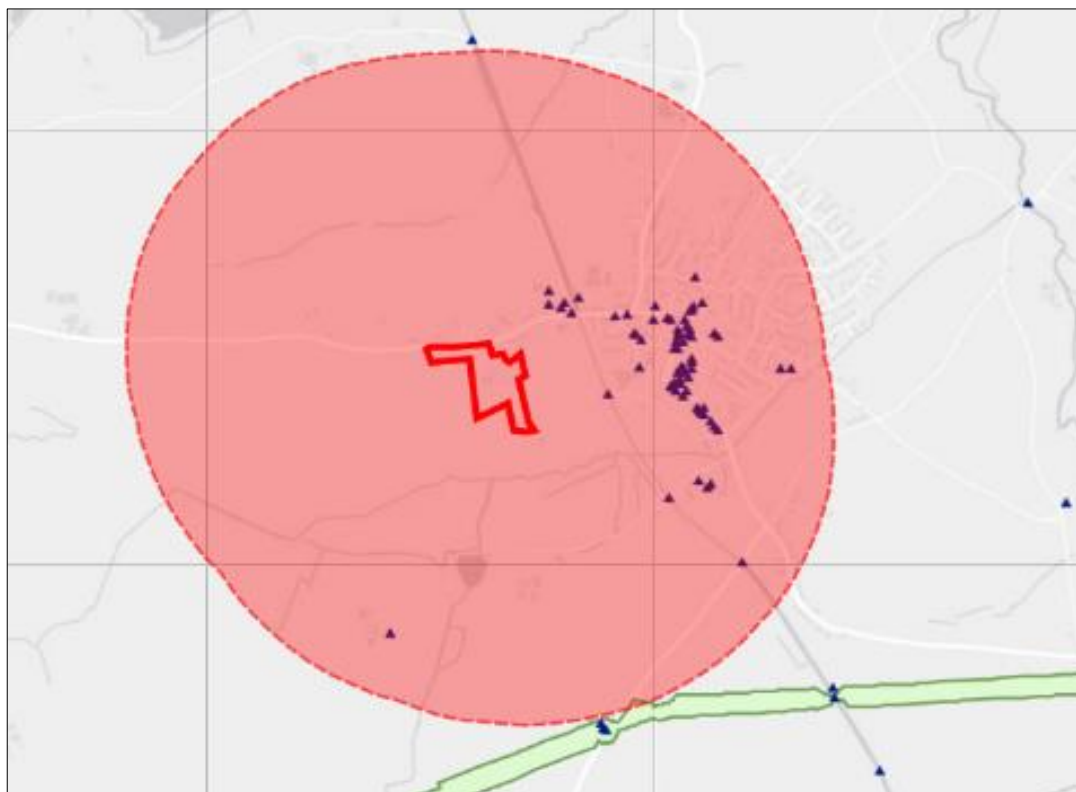


Figure 5: Historic England Map (site denoted by red line and listed buildings denoted by blue triangles)

3.3.4 HESA scores as part of the SHELAA assessment for the site indicate the site comprises a 'green rating' for both direct and indirect potential harm to the historic environment, indicating no concerns identified, on current evidence, although archaeological mitigation measures may be required.

3.4 Agricultural Land Classification

3.4.1 The map from Natural England (see Figure 6) shows the site to be Grade 3 (good to moderate quality agricultural land); the wider area falls within Grade 3 ALC with areas of Grade 2 predominantly to the northeast surrounding the settlement of Stretton.

3.4.2 The Natural England Map does not subdivide ALC into Grade 3a or 3b.

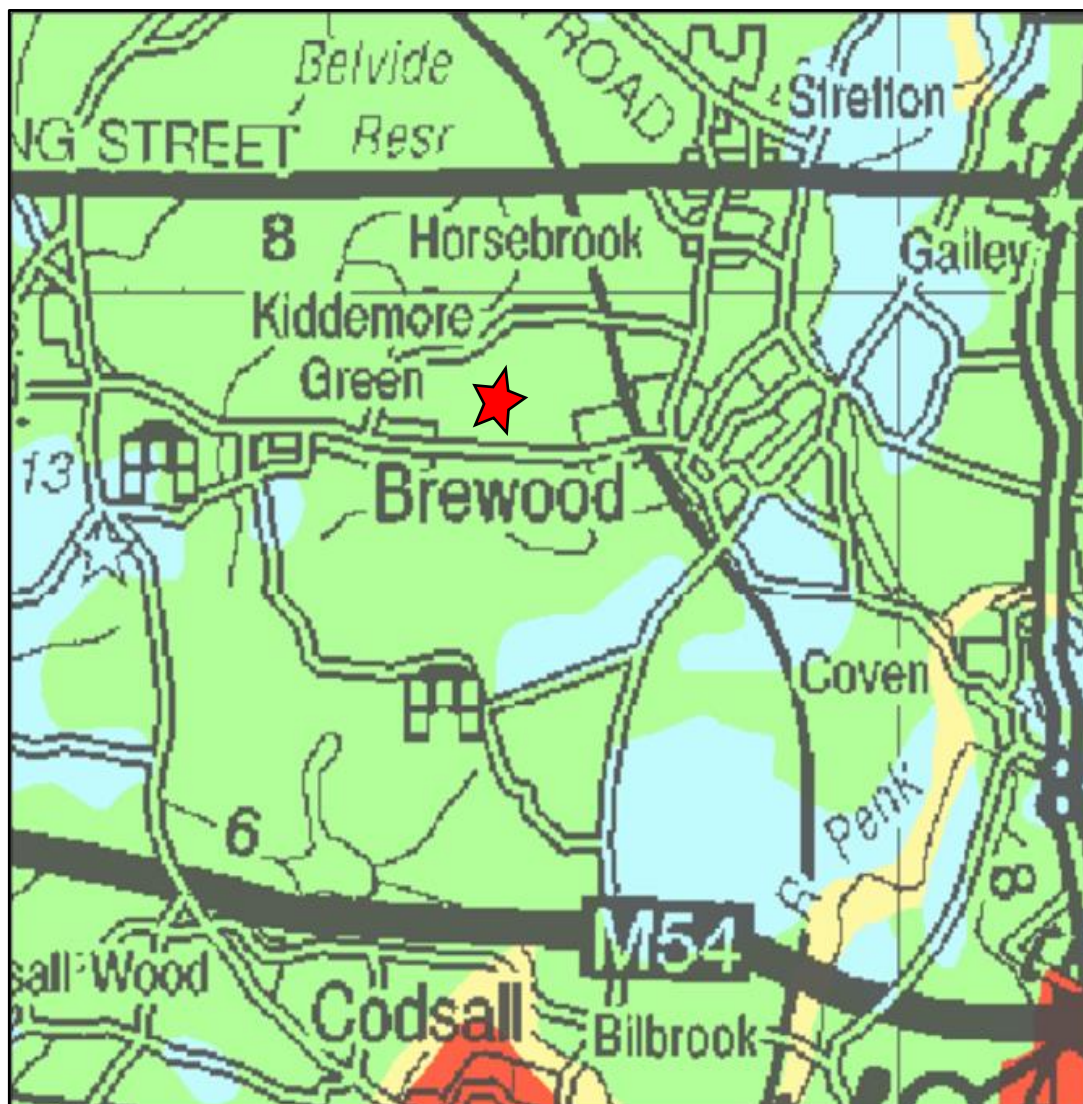


Figure 6: Extract: Natural England - Agricultural Land Classification Map (site denoted by red star)

3.5 Topography

- 3.5.1 The site is largely flat, with a gentle slope from 115m AOD in the east to 110m AOD at the western boundary. Therefore, it is considered that the development of the site is not constrained by topography.



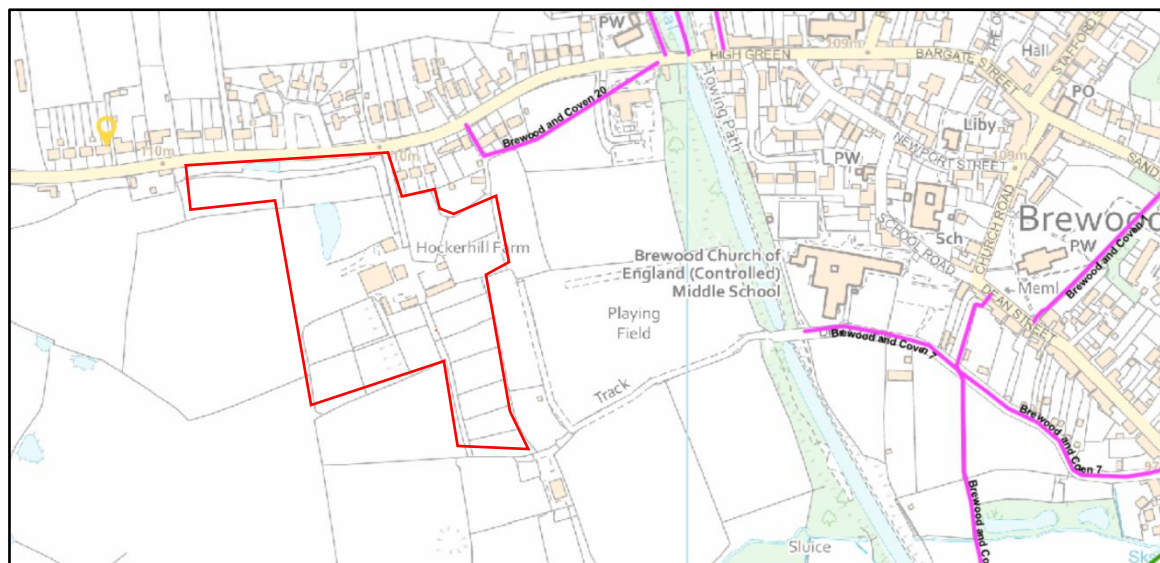
Figure 7: Extract - Ordnance Survey Map (site denoted by red line)

3.6 Landscape And Visual Impact

- 3.6.1 The site lies to the south of Kiddemore Green Road which features residential dwellings lying to the immediate north of the proposed site. The properties are separated from the site by intervening hedgerow and tree vegetation on the boundary. This existing boundary vegetation provides natural screening to the site.
- 3.6.2 Further properties, namely semi-detached residential dwellings, located on Kiddemore Green Road are separated by vegetation and the road itself.
- 3.6.3 A cluster of mature woodland, adjacent to the Shropshire Canal, separates the site from the neighbouring village of Brewood. This vegetation provides an element of physical and visual containment to the site and reduces views in the wider landscape.

3.7 Public Rights of Way (PRoW)

- 3.7.1 There are no PRoWs which traverse the site itself (see Figure 8). The Brewood and Coven 20 (Footpath) lies to the north of the site connecting the Shropshire Union Canal to Kiddemore Green Road. There are several public footpaths within the settlement edge of Brewood however, these do not provide direct PRoW links to the site.



**Figure 8: Extract – South Staffordshire Public Rights of Way Map
(site denoted by red line)**

3.8 Proximity to Local Facilities

- 3.8.1 The distance people need to travel in order to reach employment, facilities and services will inevitably affect the mode of travel and the sustainability of a location.
- 3.8.2 In respect to this site, the village centre of Brewood lies approximately 0.6km to the east. Brewood is an existing residential settlement. Wolverhampton city centre lies circa. 10.0km south of the site.
- 3.8.3 The village of Brewood features a wide variety of local facilities and public amenities and is within walking distance of the site. Brewood Medical Practice is located approx. 0.17km east of the site. The Methodist Chapel lies approx. 0.25km east of the site and the Brewood C of E Middle School lies approx. 0.30km to the east of the south eastern portion of the site.
- 3.8.4 Within the village of Brewood, there are several further local facilities including: St Mary's Primary School and Stafford Street car park. There are numerous areas of recreational amenity including Brewood Tennis Club, Brewood Cricket Club and Brewood Junior Football Club. There are also several restaurants, bars and residential properties.
- 3.8.5 There are fewer local facilities to the west of the site, as the wider landscape is occupied by vast agricultural fields. However, The Oakley Arms public house lies c. 1.15km northwest of the site.

3.9 Pedestrian Access to Education

3.9.1 The location and walking distance to primary and first schools shown on Figure 9. The site is located within the yellow (0-10 minutes) walking distance zone for access to primary and first schools. The site is located within the green zone (10-20 minutes) for access to middle schools as shown on Figure 10.

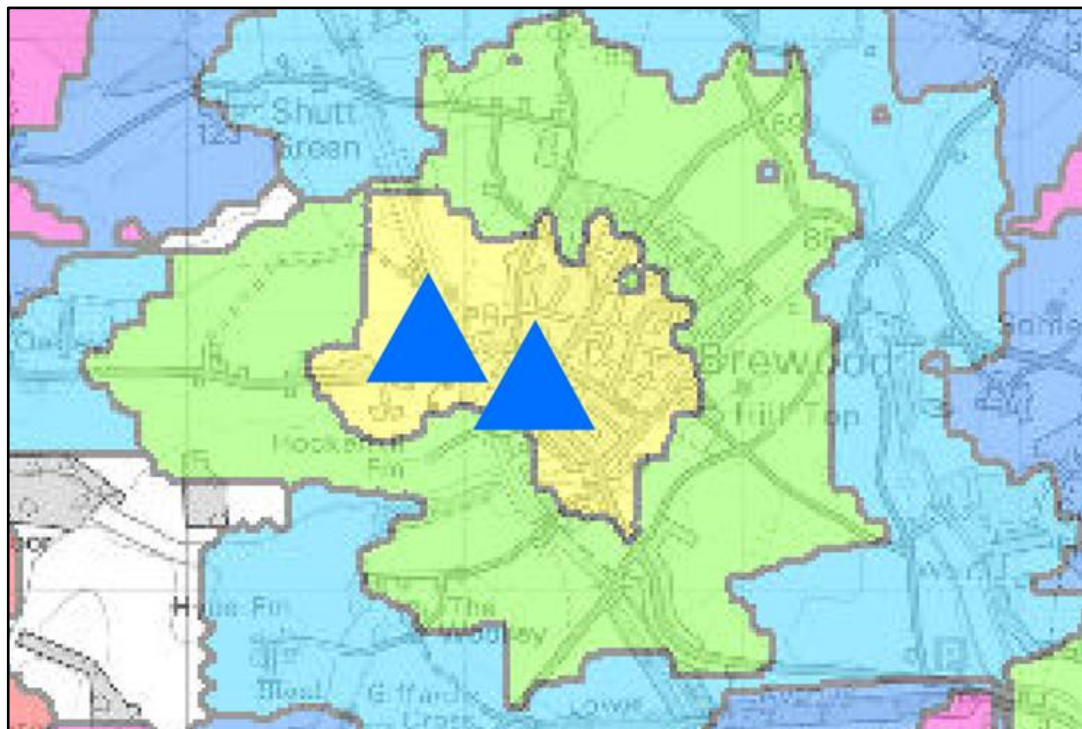


Figure 9: Extract - Staffordshire C C Walk Access to Primary and First Schools (2021)

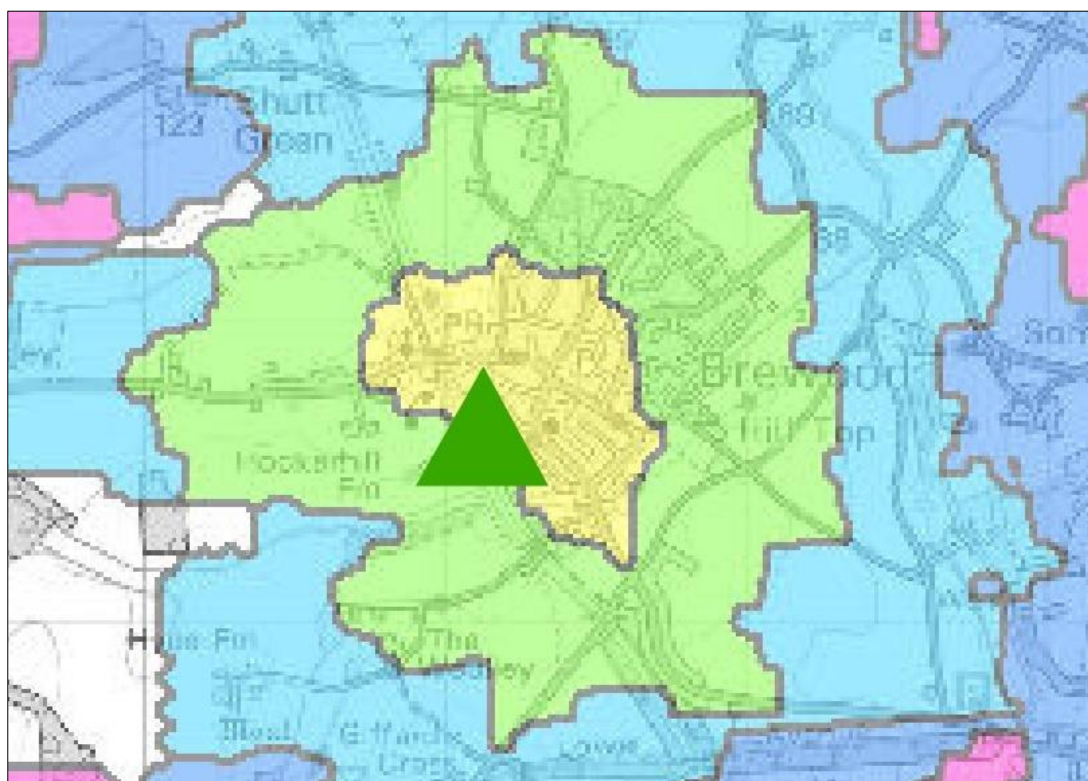


Figure 10: Extract - Staffordshire C C Walk Access to Middle Schools (2021).

3.10 Public Transport

3.10.1 The nearest bus stop to the site is the Hockerhill Farm stop, on route of the 877 and 878 (Stafford-Penkridge-Brewood-Wolverhampton) service. This is located approx. 30m north of the site on Kiddemore Green Road.

3.11 Greenbelt

3.11.1 The site is located within the West Midlands Green Belt.

4.0 Local Plan Review Context and Spatial Strategy

4.1 Brewood Spatial Strategy (Regulation 19 Local Plan Review Context)

4.1.1 The Regulation 19 Publication LP notes the following for Brewood settlement at Para 5.32:

“5.32 Housing growth in the village will be delivered through limited land release alongside the delivery of the safeguarded land previously identified adjacent to the village. This approach balances the historic character of the village, the extent of Green Belt land in this area and the relative level of services and facilities in Brewood compared to other settlements in the district. It also recognises the potential for additional allocations to be made to address the acute local need for specialist elderly housing in this location.”

4.1.2 The proposed allocations for Brewood are shown on p36 of the Publication LP. Two housing allocations are currently proposed. These comprise the safeguarded land to the northeast of the settlement (part of SHELAA site 617) and a new allocation (SHELAA site 079) to the west of settlement which is currently located in the greenbelt. These are proposed to be allocated as follows:

- Four Ashes Lane (Safeguarded land, re-allocated). Residential. 63 dwellings. Part of SHELAA site 617.
- Land South of Kiddermore Green Road. Residential. 43 dwellings (including specialist housing). SHELAA Site 079.

4.1.3 The proposed allocations are shown on Figure 11 below.

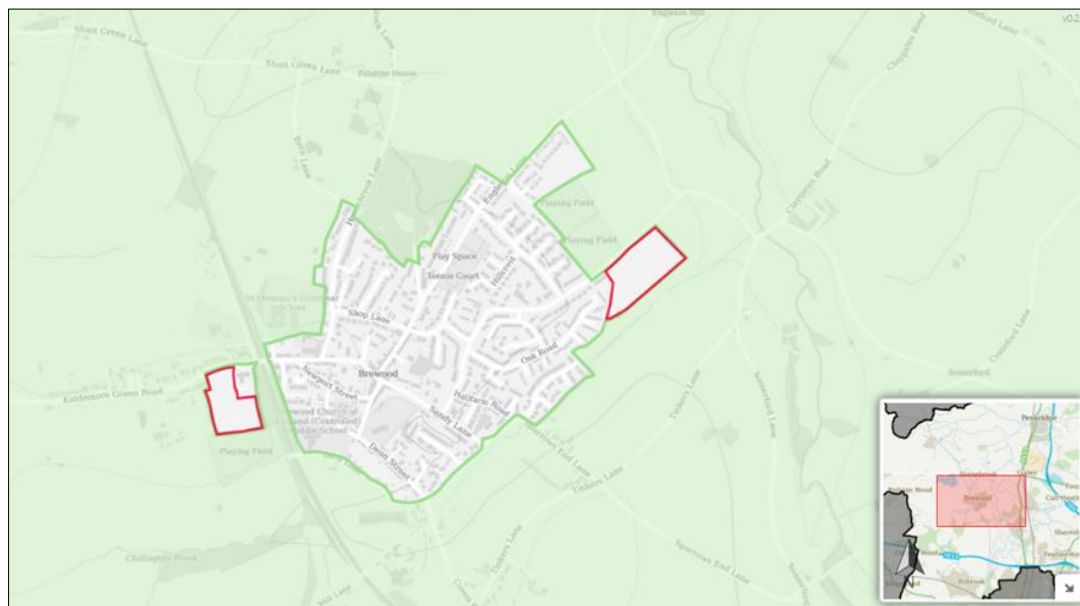


Figure 11: Extract - South Staffordshire District Council Local Plan Review Publication Map 2022 - Brewood proposed allocations (site denoted by red line)

4.2 Site in context of Spatial Strategy

- 4.2.1 The site subject to this representation is located adjacent to the Tier 2 settlement of Brewwood. Tier 2 settlements are recognised as providing access to a range of facilities, services and educational establishments in the local plan.
- 4.2.2 The South Staffordshire Green Belt Study Addendum Final Report Prepared by LUC (August 2022) shows the location of the site in relation to surrounding land parcels (Figure 12). The brown shading denotes 'moderate' greenbelt harm, light blue shading denotes moderate-high harm and dark blue shading denotes a high harm rating.



Figure 12 Extract: LUC Greenbelt Study (site denoted by red circle)

- 4.2.3 The Stage 2 Greenbelt Assessment for South Staffordshire (LUC, July 2019 Appendix 3, p488) identifies that the representation site is located in an area of moderate-high greenbelt harm in relation to the identified LUC identified parcel S32Ks1 (Figure 13). The supporting text for this parcel states that:

“The sub-parcel makes a strong contribution to preventing encroachment on the countryside. The land is adjacent to the washed over extension of Brewwood, however it remains open in character, giving it a strong relationship with the surrounding countryside. Releasing this land would breach the distinct and consistent boundary provided by the canal to the west of Brewwood. Despite the fact that the canal has been breached by development along Bargate to the north, the release would weaken the Green Belt boundary and to some degree the integrity of surrounding Green Belt land.”

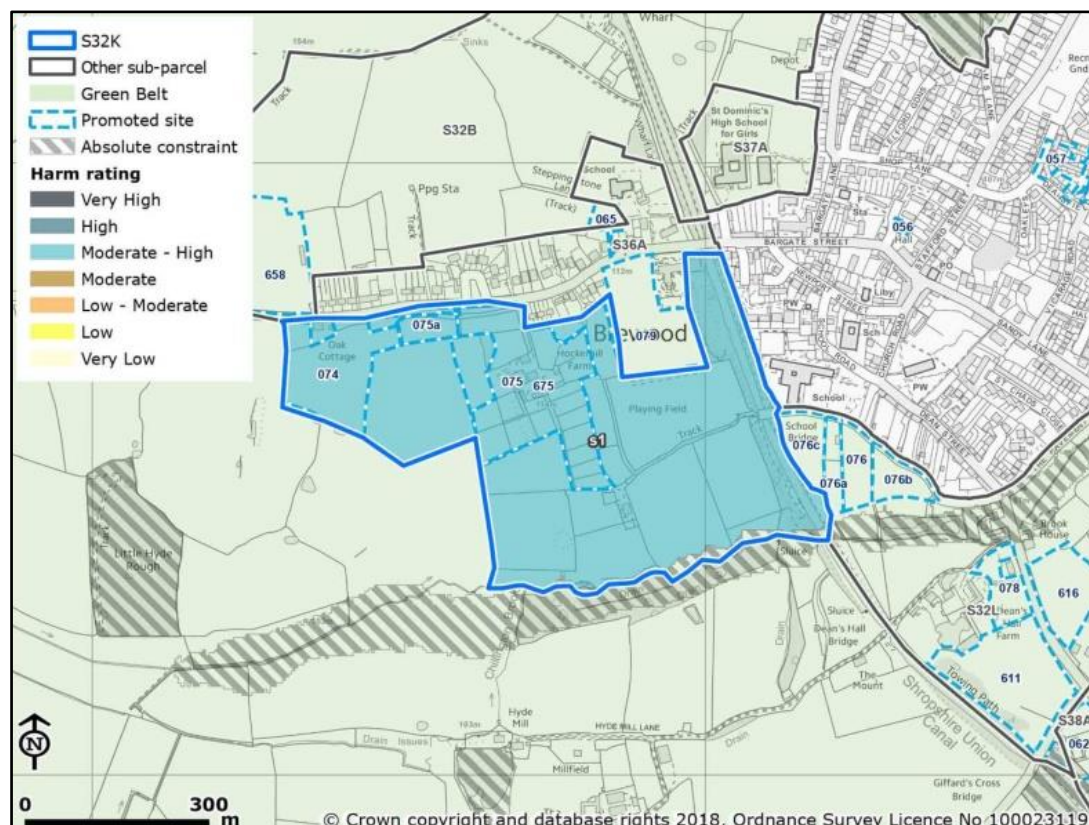


Figure 13: LUC Extract Green Belt Parcel S32Ks1 (2019)

- 4.2.4 It is noted that greenbelt parcel S32Ks1 parcel (in which this representation site is located) covers a wide geographical area of approximately 26.52ha of land. The proposed allocation site (SHELAA site 079) is located in a separate greenbelt parcel to the north (LUC Greenbelt parcel S36A), which with the exception of site 079 is otherwise predominantly defined by existing built form and attributed an overall moderate level of greenbelt harm. It is considered that the distinction between potential level of greenbelt harm for these two parcels may be over-represented through the extent of the geographical area, parcel boundaries and an aggregation of different characteristics across the wider greenbelt parcels.
- 4.2.5 LUC Greenbelt parcel S36As1 contains a single SHELAA site (Site 079, proposed Regulation 19 Brewood allocation) and is assessed as follows in the supporting text of the Stage 2 LUC Greenbelt assessment 2019 at Appendix 3 (see also Figure 14):

“The sub-parcel makes a moderate contribution to preventing encroachment on the countryside. This area of the sub-parcel is adjacent to the linear urban extension of Brewood. However, it remains open in character, giving it a relatively strong relationship with the surrounding countryside. Releasing land here would allow development to spill across the strong boundary provided by the canal to the east, however the harm to the wider Green Belt would be limited by the presence of adjacent existing linear development.”

Similarities in demonstrable site characteristics applicable to both sites 075 & 079 (SHELAA)	Differences Characteristics Site 075 (SHELAA) Proposed Representation Site	Differences Characteristics Site 079 (SHELAA) Reg 19 allocation site
High Landscape Sensitivity	Moderate-High Greenbelt Harm	Moderate Greenbelt harm
The sites provide an opportunity to deliver the growth identified for Brewood in the Spatial Housing Strategy and Infrastructure Delivery Plan (2019) consultation.	The centre of the site is roughly 820m to the nearest regular bus stop, 740m to the nearest village/neighbourhood centre and 560m to the nearest education facility.	The centre of the site is roughly 580m to the nearest regular bus stop, 500m to the nearest village/neighbourhood centre and 320m to the nearest education facility.
The sites have access to pedestrian footways into the wider settlement	HESA scores the site a green for both direct and indirect potential harm to the historic environment, indicating no concerns identified, on current evidence, although archaeological mitigation measures may be required.	HESA scores the site a green for direct potential harm to the historic environment, indicating no concerns identified, on current evidence, although archaeological mitigation measures may be required. The HESA scores the site an amber for indirect potential harm to the historic environment, indicating no significant effects which cannot be mitigated are at present predicted
Sites are within a Mineral Safeguarding Area	The development would result in loss of agricultural fields, paddocks and farm buildings	The development would result in loss of agricultural fields
Opportunity for both sites to continue existing built frontage along Kiddemore Green Road	Site is separated from the adjacent highway by a dense buffer of tree and scrub planting.	Site is separated from the adjacent highway by a row of tree planting and a level change
There are insufficient opportunities within the development boundary of Brewood to deliver the infrastructure-led strategy identified for the village. Additional growth is required above the existing levels of safeguarded land and allocations in the settlement.	County Highways assessment "Ok in principle - pedestrian connectivity may be improved by improvements to pedestrian route past canal crossing."	County Highways assessment "Ok in principle, assuming access via docters is possible. Pedestrian connectivity may be improved by improvements to pedestrian route past canal crossing."
LLFA comments "Low risk"		Site is bisected by public right of way

Table 1 Extract SHELAA assessments proformas

4.2.9 The site presents an opportunity for an additional or alternative site under Policy SA5 of the local plan that would be consistent with the proposed spatial hierarchy and spatial distribution of sites around Tier 2 settlements, subject to the consideration of Green Belt boundaries under Policy DS1.

4.3 Capacity, Suitability and Availability

- 4.3.1 The representation site area is approximately 5 hectares and as set out in the justification above the site is suitable for residential development. The site is located adjacent to the Tier 2 settlement of Brewood. Tier 2 settlements are recognised as providing access to a range of facilities, services and educational establishments in the local plan.
- 4.3.2 It is considered this proposed site at Hockerhill farm could form an appropriate allocation site, also located to the west of the canal that would be in keeping with the linear pattern of settlement form along Kiddemore Road.
- 4.3.3 The proposed representation site would therefore form part of a linear corridor of residential development in near to the development boundary of Brewood which offers access to village amenities and services associated with the Tier 2 settlement.
- 4.3.4 The site is available for development now.

5.0 Conclusion

5.1 Summary

- 5.1.1 The site is located in a parcel of land, south of Kiddemore Green Road, Brewood.
- 5.1.2 This representation has demonstrated that the site is not known to be unduly constrained in terms of topography, ecology, flood risk or heritage.
- 5.1.3 The proposed representation site (SHELAA Site 075 and 075a) is located in proximity to the proposed Regulation 19 allocation site (SHELAA Site 079) along Kiddemore Green Road, with the two sites separated by a single field. The proposed representation site contains both existing fields and a central area of existing built form associated with the Hockerhill Farm buildings. The site location, to the west of the canal would be in keeping with the linear settlement pattern along Kiddemore Road.
- 5.1.4 The site presents an opportunity for an additional or alternative site under Policy SA5 of the local plan that would be consistent with the proposed spatial hierarchy and spatial distribution of sites around Tier 2 settlements, subject to the consideration of Green Belt boundaries under Policy DS1.
- 5.1.5 The site is located on the edge of the Tier 2 settlement of Brewood, in a sustainable location that provides access to a range of facilities, amenities and schools. The village centre of Brewood lies approximately 0.6km to the east of the site and features a wide variety of local facilities and public amenities within walking distance of the site. To the east of the site lies Brewood Medical Practice at approx. 0.17km, The Methodist Chapel at approx. 0.25km and the Brewood C of E Middle School at approx. 0.30km. Within the village of Brewood, there are several further local facilities including: St Mary's Primary School, Brewood Tennis Club, Brewood Cricket Club and Brewood Junior Football Club. There are also several restaurants, bars and residential properties.
- 5.1.6 The nearest bus stop to the site is the Hockerhill Farm stop, on route of the 877 and 878 (Stafford-Penkrige-Brewood-Wolverhampton) service. This is located approx. 30m north of the site on Kiddemore Green Road.
- 5.1.7 Taking other constraints into account, and as evidenced above, the site is considered potentially suitable as an allocation for residential development in the local plan.



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