



## South Staffordshire Local Plan Review

# Preferred Options Representations submitted on behalf of Boningale Homes Ltd Oaken Parcels 1, 2 & 3

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## Introduction

- 1.1 Alder King Planning Consultants is submitting these representations on the Local Plan Review Preferred Options consultation November-December 2021 on behalf of its client, Boningale Homes Ltd.
- 1.2 Boningale Homes Ltd owns 3 no. land parcels at Oaken as delineated on the plan at **Appendix 1** and has previously submitted the requisite information to the Council's Call for Sites exercise in 2017 and made follow up representations to the Council's Spatial Housing Strategy and Infrastructure Delivery consultation in 2019.
- 1.3 These representations are written in response to the consultation questions raised within the Council's Preferred Options document in the context of the site at land parcels at Oaken being promoted through the Local Plan Review and the capacity the sites are considered to have to provide sustainable, high quality, residential development.

### **Site Location and Context**

- 1.4 The extent of Boningale Homes' land ownership of land at Oaken is shown at **Appendix 1**.
- 1.5 Oaken parcel 1 - The site borders the settlement of Oaken to the south and can be accessed off Willow Lane to the east.
- 1.6 Oaken parcel 2 – The site borders the settlement of Oaken to the south and can be accessed off Shop Lane to the north and Holyhead Road to the west.
- 1.7 Oaken parcel 3 – The site borders the settlement of Oaken to the south and can be accessed off Holyhead Road to the west.
- 1.8 The settlement of Oaken forms part of Codsall Parish with Codsall defined as a main service village in the settlement hierarchy set out in Core Policy 1 of the adopted Core Strategy and has a good range of shops and other facilities as well as a train station.
- 1.9 The adopted local plan classifies Oaken under 'other villages and hamlets' with Oaken classified as a 'main service village'.
- 1.10 Oaken parcels 1, 2 & 3 are owned by Boningale Homes, available now, deliverable and viable for the delivery of residential development. Boningale Homes are committed to providing for much needed new homes within South Staffordshire to meet the identified long term need. The three parcels are being submitted separately to account for a proportionate degree of proposed residential growth at Oaken so that the Council can decide to bring parcels forward either individually or cumulatively.
- 1.11 It is considered that Oaken could accommodate growth in order to support the Council's housing requirement, particularly in the context of the large scale increase of need identified within the South

Staffordshire Local Plan Review Preferred Options document and the close proximity of the settlement to services and facilities at Codsall.

## Local Plan Review – Preferred Options

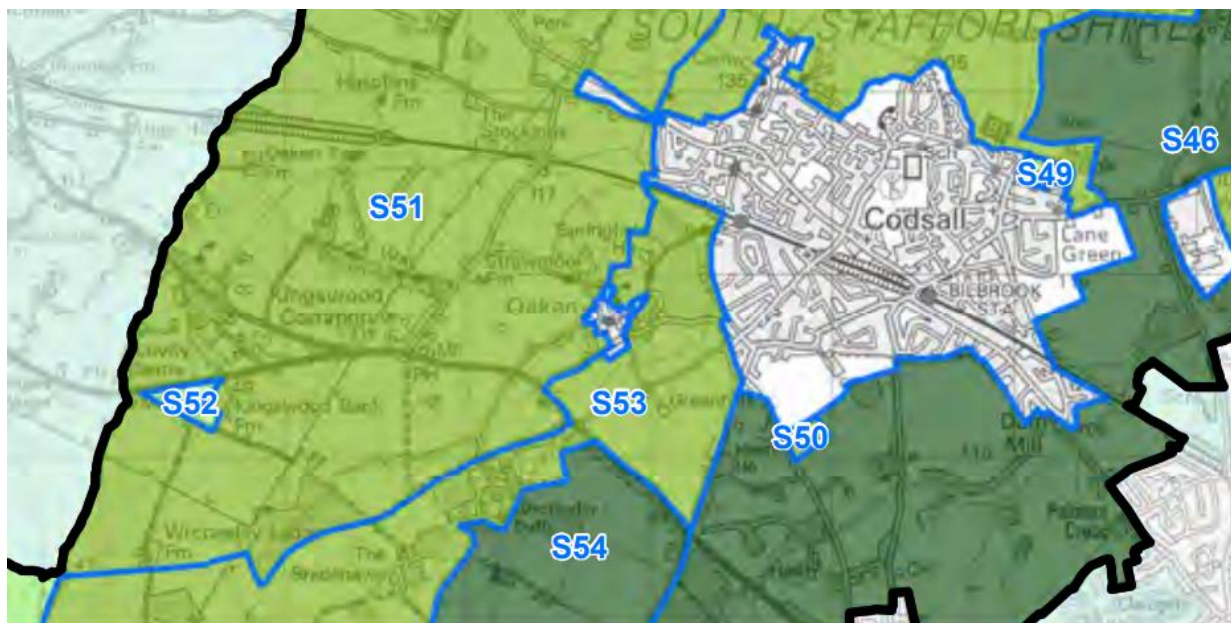
**Question 3: a) Have the correct vision and strategic objectives been identified? b) Do you agree that the draft policies (Chapters 4 and 5) and the policy directions (Chapter 6) will deliver these objectives?**

- 2.1 The SWOT analysis conducted by the Council and provided in Table 2 of the Preferred Options document acknowledges the increasing pressure for development on land within the Green Belt to meet the housing needs of the Council and that of adjoining areas.
- 2.2 Moreover, 'Table 3: Homes & Communities – issues and challenges' outlines through its duty to cooperate, that the Council needs to consider the provision of additional homes to meet the needs of the wider Greater Birmingham Housing Market Area (GBHMA) to deliver a quantum of housing above and beyond the Council's own objectively assessed housing need of 243 dwellings per annum.
- 2.3 In this regard, the Council's Strategic Housing Market Assessment (SHMA) 2021 identifies that a total of 9,068 new dwellings will be delivered in South Staffordshire over the twenty year plan period, including 4,000 new homes within the district to help meet the unmet housing need arising in the GBHMA.
- 2.4 Alder King agrees with the Council's vision and strategic objectives to "*protect the Green Belt and Open Countryside as far as possible*" (underlined for emphasis) and planning for sufficient housing to contribute to the unmet needs of the GBHMA in addition to meeting the housing needs of the district.
- 2.5 Alder King considers, owing to the scale of the identified uplift in housing need, there to be further opportunity at this stage of the Local Plan Review for greater assessment at lower tier settlements such as Oaken for direction of residential development to support growth. Particularly, Oaken parcels 1,2 & 3 represent suitable land that could support such residential development being located in close proximity to Codsall/Bilbrook which the Council classify as a Tier 1 settlement. By virtue of its proximity to Codsall, Oaken's sustainability credentials are enhanced.

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

- 2.6 The character of South Staffordshire is influenced by the scale of open countryside across the district and that circa 80% of the district is Green Belt. Notwithstanding this, the Council is duty bound by national planning policy to deliver a sustainable growth strategy to meet the district's development needs for new housing, in addition to contributing to the unmet needs of the GBHMA. This has led to the Council releasing Green Belt land and safeguarding sites for development such as those at Codsall.
- 2.7 Oaken parcels 1,2 & 3 can be considered relatively well connected to the settlement of Codsall due to the close proximity of this settlement and connectivity via Hollybush Lane and Stafford Lane. The land parcels fall entirely within the Green Belt however it is considered that further assessment should be carried out to establish the appropriateness of limited new residential development here.

2.8 Table 5.1 of the Council's 2019 Green Belt Review provides an assessment of contribution ratings for land parcels across South Staffordshire. In this context, Oaken parcels 1, 2 & 3, promoted by Boningale Homes, fall within a wider parcel numbered 'S53'. It is noted that parcel no. S53 is a very large area of land for which this assessment was carried out with this being 3,072 ha in size to the south west of Codsall including parts of Oaken. This is shown on the plan below taken from the Council's 2019 Green Belt Review. With regard to the purposes of the Green Belt, table 5.1 finds that parcel no. S53 makes: a moderate contribution to checking unrestricted sprawl (purpose 1); a weak/no contribution to preventing merging towns (purpose 2); a strong contribution to safeguarding countryside from encroachment (purpose 3); and a weak/no contribution to preserving the setting and special character of historic towns (purpose 4).



2.9 Owing to the fact that Oaken parcels 1, 2 & 3 lie adjacent to the development boundary of Oaken, suitable residential development on this land to facilitate small scale growth of Oaken could be acceptable. The assessment at 5.1 of the 2019 Green Belt Review collates these parcels within a much larger area of land totalling 3,072ha, much of which is isolated open countryside. In this context it is considered that growth could be forthcoming to the south of Oaken which would not negatively impact the overall integrity of the purposes of the Green Belt surrounding the settlement. Development on some of the land across Oaken parcels 1, 2 & 3 could be forthcoming that would constitute limited encroachment to the countryside in the context of the existing settlement. It is considered that the Council should look to carry out further specific Green Belt assessment at Oaken looking at individual land parcels and their merits. Although Tier 1 settlements are expected to take the majority of growth over the new local plan period, it is considered that there is further scope to divert proportionate growth to lower tier settlements, particularly where they are located in close proximity to Tier 1 settlements.

2.10 Alder King is content to see safeguarded land sites come forward for development through the Local Plan Review process. This is the purpose of safeguarding the land and development in these locations has already been found to be sound. There is no need for delay and it is clear that there is a pressing need to release additional land to meet the needs of the plan period. Alder King further considers that Oaken parcels

1, 2 & 3, promoted by our client are suitable examples of land that could now be safeguarded for future development.

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

- 2.11 In principle, Alder King support the principal aim of the spatial strategy to direct growth to the most accessible and sustainable locations in accordance with the Settlement hierarchy, avoiding a disproportionate level of growth in the district’s less sustainable settlements. However, it is considered that an appropriate level of growth can be facilitated at settlements lower down the hierarchy. Policy DS3 classifies Oaken as a Tier 5 settlement, where no further residential growth is proposed. However it is considered that a proportionate level of development could be supported in the context of the neighbouring Tier 1 settlement of Codsall. It is considered that the Council’s proposed spatial strategy to 2038 could be enhanced to support suitable, proportionate growth at lower tier settlements which have close ties to higher tier settlements.
- 2.12 Alder King supports the classification of Codsall/Bilbrook as a Tier 1 settlement within the hierarchy, offering a wide range of services and facilities and having access to key rail corridors into adjacent towns and cities. The sustainable growth of the settlement can be delivered through allocations made in the Local Plan along with windfall housing developments over the plan period. That being said, owing to the constraints of the Green Belt on the settlement, Alder King considers it necessary to direct further growth to this settlement as part of the Local Plan review, beyond what is currently proposed in policies SA1 & SA5 to ensure confidence that housing delivery at the settlement can be delivered.
- 2.13 In this regard, Policy DS3 proposes a delivery minimum of 8,881 dwellings over the plan period taking into account the contribution to the shortfall in the GBHMA. This equates to 444 no. dwellings per annum. The results of the 2020 Housing Delivery Test, published January 2021, evidence that South Staffordshire has delivered 255, 273 & 226 homes in the years 2017-18, 2018-19 & 2019-2020 respectively. This demonstrates the scale of uplift in dwellings to be delivered and so it is considered necessary that appropriate deliverable sites can come forward to support housing need in addition to the Council’s current housing allocation proposals. Settlements such as Oaken could accommodate a commensurate degree of growth owing to its proximity to Codsall and the services and facilities available here. In this regard, housing could be delivered on parts of Oaken parcels 1, 2 & 3 which offer good connectivity to Codsall via Hollybush Lane and Stafford Lane.

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

- 2.14 Alder King supports new strategic development locations to meet sustainable growth across the district and considers it appropriate that they be guided by their own policies and design guides to ensure acceptable comprehensive development which provides for strategic housing growth in conjunction with appropriate infrastructure and new facilities such as schools. For example, Policy SA1 on Land East of Bilbrook



proposes that an SPD including an Infrastructure Delivery Strategy, masterplan and design code which is supported. The policy notes that this SPD is planned to be adopted in the “early years” of the plan period.

- 2.15 Owing to the Green Belt constraints of Codsall/Bilbrook/Oaken, release of such land to facilitate development is supported, however, Alder King considers there to be further land available, appropriate and deliverable within the area which should also be considered. Such sites would support housing delivery at a smaller scale to the proposed strategic allocations and provide immediate delivery within the early years of the plan period. Oaken parcels 1,2 & 3 could provide more immediate housing delivery on a smaller scale that would serve to support local housing need and bridge the gap before strategic sites such as land east of Bilbrook can realistically be expected to come online and deliver new homes. New residential development across Oaken parcels 1,2 & 3 would be commensurate with the size of Oaken as a settlement and is relatively sustainable owing to the proximity to Codsall.

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

- 2.16 Notwithstanding proposed strategic allocation SA1, Alder King queries the proposals under SA5 in its allocation of only 3 sites at the Tier 1 settlement of Codsall where there is considered to be scope for further development within and around the sustainable settlement. In accordance with the Council’s settlement hierarchy, sustainable growth should be directed here in the first instance.
- 2.17 In this regard, it is further considered that the Council should reconsider the potential for limited, proportionate allocations at lower tier settlements such as Oaken which are located in close proximity to tier 1 settlements.
- 2.18 Development on parts of land contained within Oaken parcels 1, 2 & 3 could deliver smaller scale residential development commensurate to the setting of the settlement to complement the existing built form along Willow Lane and Shop Lane. While services and facilities are limited in the immediate context, Oaken is located well to benefit from close connections to Codsall to the east and with Codsall train station located only a 15 minute walk away.
- 2.19 Ultimately, it is considered that proportionate residential development on parts of land across Oaken parcels 1, 2 & 3 could provide appropriate, sustainable growth to the south of the settlement. Acceptable access can be demonstrated here to facilitate residential development which would positively support housing need. With the Council’s requirement to consider the provision of additional housing to meet the needs of the GMBHA, it is considered that settlements such as Oaken should be considered for direction of proportionate residential growth to support the established housing need, bolstered by the aforementioned uplift. Oaken parcels 1, 2 & 3 constitute land located adjacent to the existing development boundary and are well located to the neighbouring tier 1 settlement of Codsall and so it is considered that appropriate development should be supported in this location.



## Boningale Homes Precedent

- 3.1 The land parcels 1, 2 & 3 at Oaken are being promoted by Boningale Homes, who own the land, for delivery of residential development.
- 3.2 Boningale Homes is a family-owned and family-run local house builder established in 2014 with a local staff management structure, supported by a local labour supply chain including material suppliers in the west midlands.
- 3.3 Boningale Homes will deliver the proposed residential development on the site with high quality traditional spacious dwellings.
- 3.4 In this regard, photos are provided at **Appendix 2** showing the Boningale Homes development site at Millfields, Albrighton to demonstrate the standard of quality of new dwellings that would be delivered on the land at Oaken. This comprises a 2 phase development that is being developed currently. Shropshire Council planning ref: BR/APP/OUT/08/0907 and 14/05456/REM (phase 1) and 14/02448/FUL (phase 2).

## Appendix 1: Oaken Parcels 1, 2 & 3 Site Plan



## Appendix 2: Boningale Homes Millfields Site Photos









