

## Land at Brookhouse Lane, Featherstone

### **Development Vision**

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#### **Figures**

**Figure 1: Illustrative Masterplan Figure 2: Aerial View of the Site Figure 3: Strategic Site Location Plan** Figure 4: View of the Site from the M54 Motorway Figure 5: View towards northern site boundary Figure 6: View from Brookhouse Lane Figure 7: View from Brookhouse Lane Figure 8: Embankment to Eastern boundary of the site Figure 9: Existing dwellings to the North of the Site Figure 10: Local Plan Policies Map (District) Figure 11: Local Plan Policies Map (Featherstone extract) Figure 12: 2015 Landscape Sensitivity Review extract Figure 13: 2019 Landscape Sensitivity Assessment extract Figure 14: 2014 Partial Green Belt Review Method Statement extract Figure 15: 2019 Green Belt Study extract **Figure 16: Local Facilities Plan Figure 17: Public Transport Provision Plan** Figure 18: Landscape Character Assessment Plan Figure 19: Environment Agency Flood Risk Plan

### Contents

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#### Appendices

Appendix 1: Previous Appeal Decision Appendix 2: Illustrative Masterplan Appendix 3: Site Access Plan Appendix 4: Landscape and Visual Appraisal and Green Belt Assessment (PSL Ltd) Appendix 5: Preliminary Ecology Report (PSL Ltd) Appendix 6: PJA Highway Access and Sustainable Transport Note



Figure 1: Illustrative Masterplan

## **Executive Summary**

This Development Vision document has been prepared by Persimmon Homes West Midlands and demonstrates that the land at Brookhouse Lane, Featherstone, provides an ideal opportunity to create a sustainable and attractive residential development that will complement and enhance the existing village. The site is being promoted through the South Staffordshire Local Plan Review for residential development and this document is intended to support that promotion and help to inform discussions with the Council and the local community.

#### In summary:

- Featherstone is a sustainable settlement and the Site provides a natural extension to the village, being accessible by walking and cycling to a wide range of services, facilities, public transport and to wider strategic transport connections.
- South Staffordshire Council accepts that the exceptional circumstances exist to change the Green Belt Boundary through the Local Plan as they seek to ensure that sufficient housing land is allocated to meet the housing needs of the District and the wider area.
- The residential development of the Site will deliver significant social, environmental, and economic benefits and would provide a high-quality development that would be linked to Featherstone through the provision of a new linear Country Park, footpaths and cycleways.
- The Site is not affected by any over-riding physical, environmental, or technical constraints that would prohibit the development.
- The Illustrative Masterplan demonstrates that the site could accommodate approximately 156 new homes with significant areas of open space and play facilities, including the retention and enhancement of the tree belt to the south of the site.

- The development is truly deliverable and would be completed swiftly by one of the UK's leading housebuilders.
- Persimmon Homes West Midlands are committed to positively engaging with South Staffordshire Council and the local community to design a high-quality development that enhances and is sympathetic to the character of the village.

6 LAND AT BROOKHOUSE LANE, FEATHERSTONE

## **1. Introduction**

LAND AT BROOKHOUSE LANE, FEATHERSTONE 7



Figure 2: Aerial view of the site

## 1. Introduction

This document provides a vision of the development of a sustainable residential proposal on land at Brookhouse Lane, Featherstone. It explains the history of the site, which includes a planning application for residential development and explains the technical work which has been carried out by Persimmon Homes West Midlands to inform our development vision for the site. This document is intended to pave the way for more detailed consultation with South Staffordshire Council and it is intended that it will evolve as that consultation, and further technical detailed work, is undertaken.

Persimmon Homes is one of the UK's leading and most successful housebuilders, building over 16,000 new homes a year in more than 380 locations nationwide. Our interest in this site goes back some time and we strongly believe that the provision of our high-quality new homes on the site would be beneficial to the local community and to the wider area. This Development Vision Document has been prepared in the context of South Staffordshire's Local Plan Review. The current development plan for South Staffordshire consists of the Part 1 Core Strategy (adopted in December 2012) and the Part 2 Site Allocations Document (adopted in September 2018). The Site Allocations Document commits South Staffordshire to carry out an early review of the Local Plan in response to concerns about unmet housing needs in both South Staffordshire and the wider region. This commits South Staffordshire Council to submit a reviewed Local Plan for examination by the end of 2021.

The Local Plan Review 'Issues and Options' consultation ran from 8th October to 30th November 2018 and the 'Spatial Housing Strategy & Infrastructure Delivery' consultation ran from 17th October to 12th December 2019. The next stage of the process, a consultation on the 'Preferred Options' was due to commence in Autumn 2020 but has been moved to Summer 2021 due to Coronavirus pandemic. This document will support Persimmon Homes West Midlands' representations to the 'Preferred Options' consultation when it takes place and we welcome the opportunity to meet with Officers from South Staffordshire Council in advance of that consultation.

Persimmon Homes West Midlands has appointed a consultant team to assist in identifying an appropriate development vision for the site. The principal team members comprise RPS (Planning Consultants), Pleydell Smithyman Ltd (Landscape, Masterplanning and Ecology) and PJA (Transport Consultants).

This document:

- Describes the site and surroundings (Section 2),
- Provides a summary of the planning history of the site (Section 3),
- Provides a brief overview of the relevant planning policy and housing needs (Section 4),
- Demonstrates that the release of the site would not conflict with the five purposes of including land within the Green Belt (Section 5),
- Demonstrates that the site is sustainable, including a summary of the technical work that has been undertaken (Section 6),
- Presents a development vision for the site (Section 7), and
- Provides overall conclusions.

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10

## 2. The Site and Surrounding Area



Figure 3: Strategic Site Location Plan

## 2. The Site and Surrounding Area

#### **Site Context and Location**

The Site is located to the southern edge of Featherstone, one of seven 'Local Service Villages' within South Staffordshire. The Site enjoys excellent accessibility to the strategic road network and is within close proximity to Junction 1 of the M54 and the A460 that currently links the M54 to the M6.

Featherstone is located approximately 4 miles to the north of the centre of the City of Wolverhampton. It is believed that Featherstone was originally a farming community consisting of a few scattered farms, it is mentioned in the Domesday Book of 1086, and was owned by the clergy of Wolverhampton Church. The village's population at the time of the 1851 census was 35. By 1921 this had risen to 39 and by the time of the 2011 census it was 4,725.

ROF Featherstone, an allocated Strategic Employment Site, is located approximately 500m to the west of the Site and the Hilton Cross Strategic Employment Site, is located approximately 130m to the south of the Site (on the opposite side of the M54).

#### The Site and Surroundings

The Site is relatively flat and gently slopes down from east to west. There is a similar, gentle fall in ground level from south to north with land draining into a minor watercourse along the northern boundary of the Site. Within the wider area the landform gently falls to the west in the vicinity of Featherstone prison. Beyond the motorway embankment to the south the land rises across to the Hilton Cross Business Park.

The full length of the southern boundary adjoins the M54 and M54 sliproad and comprises a belt of woodland planting, typically 40m in depth, that has been planted on an earth embankment several metres above the carriageway and Site. The embankment and planting also follows the eastern boundary of the Site.

To the north of the Site the boundary adjoins the relatively modern housing estates of Featherstone and the grounds of the Featherstone Academy Primary School. An intermittent strip of native tree planting follows a minor watercourse and at the north eastern end of the Site there is an area of outside storage.



Figure 4: View of the site from the M54 Motorway



Figure 5: View towards northern site boundary



Figure 6: View from Brookhouse Lane



Figure 7: View from Brookhouse Lane



Figure 8: Embankment to Eastern boundary of the site



Figure 9: Existing dwellings to the North of the Site

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## 3. Site History

LAND AT BROOKHOUSE LANE, FEATHERSTONE 17



## 3. The Site History

An outline planning application (reference 06/00638/OUT) for the erection of up to 360 dwellings with associated access, public open space, community facilities and infrastructure was submitted to South Staffordshire Council in 2006. An appeal against the non-determination of the application was submitted, the subsequent Public Inquiry being held in June and July 2007. The Planning Inspector concluded, in a Decision Notice dated August 2007, that the appeal should be allowed, and outline planning permission granted for the proposed development. The appeal was recovered by the Secretary of State (SoS) who disagreed with the Planning Inspector and dismissed the appeal over 12 months later in October 2008.

Whilst this decision is now several years old, and the appeal was ultimately dismissed there are a number of conclusions reached by both the Planning Inspector that remain relevant today. The primary reason for the SoS reaching a different decision to the Planning Inspector relates to a material change in the approach to housing land supply that occurred between the Public Inquiry and the SoS reaching their decision. The site was not considered to be unsuitable for development by either the Planning Inspector or the SoS. The following paragraph (¶) references relate to the Secretary of State decision letter.

At ¶24 it is confirmed that the SoS agreed with the Inspector that if the site were to be redeveloped the resulting boundary would be equally well, if not better, defined, and that the development of the site would not result in significant urban sprawl or have an effect on the character of historic towns. It is also confirmed that the SoS agreed with the Inspector that the impact of the proposal on the visual amenities of the Green Belt would be very limited.

In reference to landscape impact the SoS agreed with the Inspector (at  $\P27$ ) that the site is very well contained within firmly defined boundaries and that the scheme would not have a materially harmful effect on the

landscape character of the area. At ¶31 the SoS identified that the development would have caused only limited harm to the fundamental Green Belt aim of keeping land permanently open.

At ¶35 the SoS confirmed that the site is in a sustainable location in transport terms and that the availability of local facilities would reduce the need to travel. Both the Inspector and the SoS (at ¶36) concluded that the site could be developed and occupied safely in terms of flood risk. The Inspector also concluded that the site has no archaeological interest and that subject to conditions it could be developed without any detrimental impact on protected species or general biodiversity. Similarly, issues relating to air quality and noise could be satisfactorily addressed at the detailed stage, conclusions not contested by the SoS.

As stated above we have commissioned supporting technical reports relating to Transport, Ecology and Landscape and Visual Impact to establish whether the conclusions previously reached by the Planning Inspector and the Secretary of State remain valid. The reports are consistent with those conclusions and further details are set out below in Section 6.

## 4. Planning Policy

LAND AT BROOKHOUSE LANE, FEATHERSTONE 21



Figure 10: Local Plan Policies Map (District)

## 4. Planning Policy

#### **Adopted Development Plan**

The Development Plan for South Staffordshire consists of two documents. Part 1 is the Core Strategy that was adopted in 2012 and Part 2 is the Site Allocations Document that was adopted in September 2018.



Figure 11: Local Plan Policies Map (Featherstone Inset)

The site is within the Green Belt and adjoins the southern edge of the village of Featherstone, which is designated as a Local Service Village in the Core Strategy. Within these villages limited development will be supported 'where it meets local needs, whilst recognising the constraints that impact upon the District'.

Adopted in 2012, the Core Strategy has a plan period of 2006 to 2028 and seeks to ensure the provision of 3,850 new homes over that period (175 new dwellings per year). As of 2010 a total of 2,244 new homes had already been completed or were committed and as such the Core Strategy sought to deliver only 1,610 new dwellings.

The Site Allocations Document (SAD) sought to allocate the housing land required to deliver the level of housing provision set out in the Core Strategy, rather than undertake a new assessment of housing need. The SAD allocated land for 1,012 new dwellings, reduced from 1,610 due to changes in supply that had taken place following the adoption of the Core Strategy.

Concerns were raised during the SAD examination that the housing requirement within the Core Strategy was no longer appropriate and that it did not represent an objective assessment of housing need for the district as it was largely based on the outdated, and revoked, West Midlands Regional Strategy. In addition, significant cross-boundary issues had arisen in terms of unmet housing need across the West Midlands, particularly from the Greater Birmingham Housing Market Area, including Birmingham and the Black Country. This points to an identified shortfall in housing provision of some 37,900 homes from Birmingham and an emerging shortfall of almost 22,000 homes from the Black Country area.

In response to those concerns Policy SAD 1 was included in the Plan and requires the submission of a new plan for examination by the end of 2021. The new Local Plan will set out how much development is required in the district up until 2037 and will include residential, retail and employment use, including specific site allocations.

#### **Local Plan Review**

South Staffordshire Council are undertaking a review of the local plan as required in Policy SAD 1 of the Site Allocations Document. To date South Staffordshire Council has consulted on the 'Issues and Options' (October to November 2018) and on the 'Spatial Housing Strategy & Infrastructure Delivery' (October to December 2019).

The next stage of the process, a consultation on the 'Preferred Options' was due to commence in Autumn 2020 but has been delayed to summer 2021 due to the Coronavirus pandemic. Persimmon Homes West Midlands will make representations to the consultation on the Preferred Options to demonstrate that the Site should be allocated for housing development.

The 'Spatial Housing Strategy & Infrastructure Delivery' document focused on housing growth and considered broad locations for growth. South Staffordshire Council are promoting an approach which proposes to meet their own housing needs and to test whether they can provide up to 4,000 new homes for the Black Country and wider region. This equates to a housing target of 8,845 homes over the Plan period (2018 to 2037), or 466 new dwellings per year. This represents a significant increase when compared to the 175 new dwellings per year figure within the adopted Core Strategy and Green Belt land will need to be released to ensure the delivery of these homes.

The 'Spatial Housing Strategy & Infrastructure Delivery' document considers responses to the Issues and Options consultation, and the locally prepared evidence base, including Green Belt and Landscape Studies, and contains seven Spatial Housing Options. These options include keeping Green Belt release to a minimum and utilising Green Belt land where development would be least harmful. They also consider locating development in villages with the highest affordability issues, and where there were higher levels of local need. The options also consider those areas highlighted in the Greater Birmingham Housing Market Area Growth Study.

The Council consider that 3,861 dwellings can be delivered during the plan period without any further release of Open Countryside and Green Belt land. As such, almost all Spatial Options involve the release of Green Belt land. This recognises that all options are based on a strategy that seeks to contribute up to 4,000 dwellings to the unmet needs of the Greater Birmingham Housing Market Area (GBHMA). Options B and C would include new site allocations at Featherstone which is fully supported by Persimmon Homes West Midlands.



## 4. Planning Policy

The preferred approach of South Staffordshire Council is Option G (described as being "very much Member led"). The Council state this option will meet their housing numbers and contribute (under their legal Duty to Cooperate) to the wider unmet housing need. This approach will lead to Green Belt release and the Council acknowledge the tension between providing new homes and protecting the Green Belt. Most Spatial Options involve a degree of growth in the district's larger and more sustainable rural settlements, recognising the findings of the Rural Services and Facilities Audit 2019, National Planning Policy Framework (NPPF) requirements regarding sustainable transport, the need to prioritise Green Belt release in locations well-served by public transport and the support for this approach in the Sustainability Appraisal of the Issues and Options consultation.

#### **National Planning Policy**

The National Planning Policy Framework (NPPF) (February 2019) is primarily of relevance to the current Green Belt status of the site. There are five purposes for including land within the Green Belt (¶134): to check unrestricted sprawl of large built-up areas; to prevent neighbouring towns merging; to assist in safeguarding the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist in urban regeneration. Once established, Green Belt boundaries should only be altered where "exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans" (¶136).

The 'Spatial Housing Strategy & Infrastructure Delivery' document states that the new Local Plan will deliver 8,845 new homes over the plan period and that only 3,861 dwellings can be provided without any further release of Open Countryside and Green Belt land. Almost all Spatial Options (including the Council's preferred option) will involve the release of Green Belt land. It is clear that the Council concludes that the exceptional circumstances that should exist to justify changes to Green Belt boundaries, as set out in ¶137, are in place and that the Local Plan Review will need to amend the Green Belt boundary within South Staffordshire to accommodate the housing need for the district, and a proportion of the unmet need in the wider region.

Strategic policy making authorities should promote sustainable patterns of development, give first consideration to land which has been previously developed and/or is well-served by public transport, and set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land (¶138).

We fully support the Council's conclusion that there is justification to release land from the Green Belt through the local plan review. There is clearly a limited supply of land outside of the Green Belt within South Staffordshire and this Site offers a prime opportunity to accommodate a sustainable development, as concluded by the Planning Inspector and the Secretary of State when considering a previous development at this site.

The supporting Landscape and Visual Appraisal and Green Belt Assessment (Pleydell Smithyman Ltd) provides a detailed assessment of the Site and the contribution that it makes to the five purposes referred to above and is summarised in Section 5 of this document.

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## 5. Landscape and Green Belt Review

## 5. Landscape and Green Belt Review

#### **Site Context and Location**

As explained in Section 4, the Council is required to undertake an early review of the development plan, and for the new plan to be submitted for examination by the end of 2021. The review is underway, although the next stage of the review, the Preferred Options stage, has been delayed to Summer 2021 due to the Coronavirus outbreak. As set out above, the 'Spatial Housing Strategy & Infrastructure Delivery' document states the Green Belt boundary will have to be amended to deliver the 8,845 new homes being planned for over the plan period and that this represents the exceptional circumstances to justify changes to the Green Belt boundary.

Nearly 80% of the district is designated as Green Belt land which clearly places a significant restriction on the availability of land not within the Green Belt on which to accommodate the new homes required over the plan period. Figure 10 above shows the extent of the Green Belt across the district.

The Site has a close visual and physical relationship to the adjoining settlement of Featherstone and views to the wider landscape to the south and east are restricted by mature woodland planting along the motorway embankment. Beyond Brookhouse Lane to the west there are medium-scale arable fields and blocks of coniferous woodland are located near the perimeter of Featherstone Prison. Established residential development and the nearby major road corridors have an important urbanising influence on local landscape character.

The Landscape Sensitivity Review prepared by South Staffordshire Council in 2015 identified the Site as having a Low sensitivity to new housing, noting that all other land surrounding the settlement of Featherstone was rated at a Medium or High sensitivity. The study states that the Site is *"Well-screened from M54 by well-vegetated embankment. Urban influences form settlement edge and therefore relates well to the urban area. Development would be a logical extension to the settlement".* 



Figure 12: 2015 Landscape Sensitivity Review extract

As part of the evidence base for the Local Plan Review an updated Landscape Sensitivity Assessment was published in 2019. The Site forms part of Parcel SL51, which also includes land beyond the Site boundary, most notably to the west of Brookhouse Lane. The Site is assessed as having a Low-Moderate landscape sensitivity (see Plate 4). The landscape sensitivity judgement for the parcel states: 'The landscape is considered to have a low-moderate overall sensitivity to residential and/or employment development due to its weak natural character and visual enclosure and the significantly impact of its proximity to modern large scale development'



Figure 13: 2019 Landscape Sensitivity Assessment extract

A Landscape and Visusal Appraisal has been undertaken by Pleydell Smithyman to conside the landscape impact of the development of the site and this concludes that the overall rating for the Site should be Low and not Low-Moderate which accords with the Landscape Sensitivity Review undertaken by South Staffordshire Council in 2015.

The South Staffordshire Partial Green Belt Review Method Statement was prepared by LUC and was published in January 2014. The Review concluded the Site makes a limited contribution to Green Belt purposes.



Figure 14: Partial Green Belt Review Method Statement extract

The Site (Parcel 7) was considered to make the least contribution to Green Belt purposes of the land available around Featherstone, along with Parcel 6 to the east of Featherstone which comprises all of SHE-

LAA Parcel 397 (housing safeguarded land) and Parcel 647, adjoining a more recent employment allocation. Development of parcels 397 and 647 would effectively create a continuum of built development, connecting the village of Featherstone with the prison to the west.

The South Staffordshire Green Belt Study, also prepared by LUC, was published in 2019 as part of the Local Plan Review evidence base. In this more recent document, the Site forms part of Parcel S20 which is a large tract of land between Wolverhampton, Walsall and Cheslyn Hay comprising 1,221.2 hectares of land. Parcels assessed in the study vary greatly in size, with several under 4 hectares in size i.e. smaller than the Site. In this scenario, the assessment of Parcel S20 against the Green Belt Purposes has limited value for the Site in terms of its contribution to the Green Belt.

Stage 2 of the Study sub-divides the parcels into smaller units and the Site is located within Parcel S20G (see Figure 15). The analysis for the sub-parcel states:

"The sub-parcel makes a strong contribution to the prevention of sprawl of the West Midlands conurbation and to preventing encroachment on the countryside, and a moderate contribution to maintaining the separation between the neighbouring towns of Wolverhampton and Cheslyn Hay. The land is separated from industrial development to the south by the strong boundary of the M6 and to the north is contained by the settlement edge of Featherstone. Due to the extent of its containment, particularly the role of the M54 and associated woodland belts to the east, the release of this land would simplify the Green Belt boundary and would not weaken the integrity of surrounding Green Belt land".



Figure 15: 2019 Green Belt Study extract

It is unclear how the harm ratings have been derived when the assessment of Parcel contribution to Green Belt purposes has been derived from the Stage 1 study. Our own analysis of the Site (set out out in the PSL LVA and Green Belt Assessment) against the Green Belt Purposes indicates an even lower harm rating would be appropriate.

¶133 of the NPPF states that the essential character of Green Belts is their openness and their permanence, with the fundamental aim of preventing urban sprawl and ¶134 sets out the five purposes which Green Belt should serve. The PSL LVA andf Green Belt Assessment undertakes a detailed assessment of the site against those five purposes that can be summarised as follows:

#### Purpose 1: To check the unrestricted sprawl of large built-up areas.

The Site would be well related to the existing settlement of Featherstone to the north. The Site is bounded to the west by East Road/ Featherstone Lane and to the west by Junction 1 of the M54 and the A460 which both represent strong defensible boundaries. The proposed spine road and associated planting would represent a strong defensible and permanent Green Belt boundary.

### Purpose 2: To prevent neighbouring towns merging into one another

The nearest settlement to Featherstone is Wolverhampton. The Site is already physically and visually separated from Wolverhampton by the M54 corridor and the associated wooded embankment and although the development of the Site would result in a minimal reduction in the width of the Green Belt in this location it would not lead to any physical or visual coalescence between Featherstone and Wolverhampton.

### Purpose 3: To assist in safeguarding the countryside from encroachment

Most of the Site is currently under agricultural cultivation. However, the close relationship to the existing settlement edge of Featherstone to the north and the influences of major road corridors to the south and east combine to provide a strong urban fringe character. There is also a high level of visual containment. Given the clearly identifiable boundaries which would define the extent of built development, the release of the Site from the Green Belt for development would not result in encroachment into the wider countryside.

## Purpose 4: To preserve the setting and special character of historic towns

There are no historic towns to consider in this assessment.

## Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

The north-eastern corner of the Site is not in productive agricultural use comprising hardstanding with unauthorised traveller use and overgrown scrub. This area covers 26% of the gross developable site area shown. Consequently, development of the Site would have some benefit in assisting urban regeneration.

#### **Accessibility Improvements**

As stated above, ¶138 of the NPPF states that the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land.

The proposed Illustrative Masterplan includes a linear Country Park that would represent approximately half of the Site. This would be available for informal recreation and would include native tree planting and opportunities for biodiversity enhancements. This would represent a significant improvement to the accessibility of the remaining Green Belt as there is currently no access to the site due to its agricultural use.

In conclusion, a sensitive landscape led approach to the development of the Site could be accommodated without any notable landscape and visual impacts. This development would also provide the opportunity for enhancement of Green Belt land as a linear country park for public amenity and ecological benefit.

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## 6. Is the Site Sustainable?



Figure 16: Local Facilities Plan

## 6. Is the Site Sustainable?

The South Staffordshire Council Rural Services and Facilities Audit (2019) appraises the relative level of services and facilities present in settlements within the district and forms part of the evidence base for the Local Plan Review. The Audit reviews 48 settlements within the district and defines them all into one of five 'tiers'. Featherstone is designated as a Tier 3 settlement which typically have a small food store but generally have far fewer educational facilities in comparison to Tier 1 and 2 villages and generally have less of a range of services and facilities within the village compared to Tier 1 and 2 villages. These villages still have a degree of access to services and facilities outside the village via public transport. The main difference between Featherstone and those settlements within Tier 2 is the lack of a secondary school or 6th form college within the settlement.

Most of the facilities within Featherstone are located towards the southern side of the village along The Avenue (see Figure 16 PJA Local Facilities Plan), within easy walking distance of the Site. The Featherstone Academy Primary School is situated immediately to the north of the Site with the playing field associated with the school backing onto the site's northern boundary.

There are two parades of retail units along The Avenue (see photos) that contain a Post Office, several convenience stores, a pharmacy, a hairdresser, and hot-food take-aways. The Featherstone Methodist Church is located at the eastern end of The Avenue. The village also contains the Featherstone & Hilton Community Centre and the Featherstone Family Health Centre, towards its northern edge, and a the Red, White and Blue Public House and a Petrol Filling Station along the A460

The Highways Access and Sustainable Transport Note prepared by PJA sets out approximate walking and cycling journey times to those facilities. The journey time to the Health Centre is approximately 9

minutes by foot and 4 minutes by cycling; the journey time to the various convenience stores is between 2 and 4 minutes by foot and approximately 1 minute by cycling and the journey time to the Primary School is approximately 7 minutes by foot and 2 minutes by cycling.

The Hilton Cross Business Park (one of the District's Strategic Employment sites) is located to the south of the site and is accessible on foot, bicycle or by car. The ROF Featherstone Strategic Employment Site is located to the west of the Site and, when built, will also be within easy walking distance of the site.

It is evident that the site location is highly sustainable and that it relates well to shops, services and facilities within the village and is accessible to wider centres of employment, including by bus, and is well located in relation to the strategic road network.

#### **Technical Assessments**

Provided below is a summary of the results of the various technical assessments which have been undertaken to identify site opportunities and constraints to help inform the development vision. This includes some matters that were considered in detail during the earlier Public Inquiry relating to the residential development of the Site.

#### **Transport and Access**

Brookhouse Lane is a single carriageway road which runs east-west providing access to surrounding residential areas, local facilities and A460 to the east. Between its junctions with East Lane and The Avenue, Brookhouse Lane has a speed limit of 30mph, with traffic calming in the form of speed cushions outside Featherstone Academy. South of the site, the road becomes more rural in nature, and the speed limit increases to the national speed limit (60mph).

Access to the site would be provided from a priority junction onto Brookhouse Lane as shown in Drawing 04832-SK-0001-P01 contained (see Appendix 3). This junction can achieve required visibility splays based on posted speed limits (30mph). The site's extensive frontage onto Brookhouse Lane provides flexibility to accommodate any changes to the access design and longer visibility splays if required.

A new pedestrian / cycle link to the A460 at the north eastern corner of the site will also be provided and additional pedestrian / cycle links through the site to the north will also be provided where this is achievable.

Enhancements could be made to the existing footway along Brookhouse Lane to link into the existing footpath provision as there is currently a break in the footpath along the Site's western boundary.

Public transport services are present within the vicinity of the Site. The No.70 bus service stops close to the site along Brookhouse Lane / The Avenue and the A460 as shown on Figure 17 (the PJA Public Transport Provision Plan).

The No.67 bus service runs to the western boundary of the site along Brookhouse Lane. It is anticipated that discussions would be held with the local bus operators to understand whether any additional bus stop facilities could be provided along Brookhouse Lane.

The nearest railway stations to the site are Wolverhampton (approximately 8.1km) and Landywood (approximately 7.1km). Landywood Railway Station is served by two trains per hour (Monday to Saturday) in each direction between Birmingham New Street and Rugeley Trent Valley. Wolverhampton Railway Station is served by regular services to a range of local, regional, and national destinations. The station can be accessed by the number 70 bus service from the site.



Figure 17: Public Transport Provision Plan

- The site benefits from being near the strategic road network, and key routes towards Wolverhampton and Cannock,
- Safe and suitable vehicular access to the site can be delivered from Brookhouse Lane, without the need for third party land,
- A pedestrian and cycle access strategy will maximise links to existing local facilities in Featherstone,
- The site can be made even more accessible by public transport through diversion of an existing bus service, or provision of additional pedestrian and cycle links onto Brookhouse Lane and A460 Cannock Road, and
- The proposals to provide a direct link between M54 and M6 will reduce traffic levels on the A460 within the vicinity of the site. This will provide a more attractive walking and cycling route for residents, alter the route of existing local bus services, and also change the likely trip distribution for the development traffic to access Wolverhampton and the wider strategic road network.

#### Landscape and Visual Impact

The Site is relatively flat ground that very gently slopes from east to west at a gentle gradient. There is a similar fall from south to north across the Site with land draining into a minor watercourse along the northern boundary of the Site. Within the wider area, the landform gently falls to the west in the vicinity of Featherstone prison and beyond the motorway embankment to the south the land rises by several metres across the Hilton Cross Business Park. To the north, the levels within the settlement of Featherstone are similar to the Site itself, whilst land to the east rises within Hilton Park to a high point near Tower House Farm.

The full length of the southern boundary adjoins the M54 and M54 slip-road and comprises a belt of native deciduous woodland planting, typically 40m in depth that has been planted on an earth embankment several metres above the carriageway and Site. The embankment and planting also follows the eastern boundary of the Site where it lies adjacent to the junction 1 roundabout and the A460 Cannock Road.

To the north of the Site the boundary adjoins the modern housing estates of Featherstone and the grounds of the primary school. An intermittent

strip of native tree planting follows a minor watercourse and at the north-eastern end of the Site there is an area of outside storage and unauthorised traveller site and an uncultivated area of ground that has become invaded by scrub.

The Site has a close visual and physical relationship to the adjoining settlement of Featherstone and views to the wider landscape to the south and east are restricted by mature woodland planting along the motorway embankment.

The Site lies on the boundary between the Mid Severn Sandstone Plateau (National Character Area (NCA) 66) to the west and the Cannock Chase and Cank Wood (NCA 67) to the east.

The South Staffordshire Council Landscape Sensitivity Assessment (LUC - 2019) provides an assessment of the extent to which the character and quality of the landscape abutting the West Midlands conurbation within the Black Country and South Staffordshire and the settlements in South Staffordshire is, in principle, susceptible to change as a result of introducing built development.

The Site forms part of Parcel SL51, with the parcel including land beyond the boundary of the Site. The Site is assessed as having a Low-Moderate landscape sensitivity \*see Figure \*\*). The landscape sensitivity judgement for the parcel states:

"The landscape is considered to have a low-moderate overall sensitivity to residential and/or employment development due to its weak natural character and visual enclosure and the significantly impact of its proximity to modern large scale development"



Figure 18: Landscape Sensitivity Plan

A detailed review of the assessment has been undertaken by Pleydell Smithyman Limited and is contained within the Landscape and Visual Appraisal and Green Belt assessment. That review concludes that the rating for the Site should be Low and not Low-Moderate as assessed for the wider parcel by LUC. This conclusion accords with the Landscape Sensitivity Review undertaken by South Staffordshire Council in 2015.

That concludes that identified the Site as having a Low sensitivity to new housing, noting that all other land surrounding the settlement of Featherstone was rated at a Medium or High sensitivity. The 2015 study states that the Site is "*Well-screened from M54 by well-vegetated embankment. Urban influences form settlement edge and* 

therefore relates well to the urban area. Development would be a logical extension to the settlement"

In terms of the potential for mitigation and improvement of the settlement edge it is stated:

*"Any development should be concentrated to the east of Brookhouse Lane and would need to incorporate additional planting against the M54 corridor. Take account of Public Open Space proposal."* 

The development of the Site, as shown on the Illustrative Masterplan, would fully incorporate this mitigation and would not result in a detrimental impact on the wider landscape as a result. The development as shown would deliver approximately 156 units over 4.86 hectares of net developable area at a net density of approximately 32 dwellings per hectare. The density is comparable with the existing housing estates adjacent to the northern boundary of the Site that accommodate a variety of detached, semi-detached and terraced dwellings. The built development would not exceed 2 storeys in height and would be contained within residential blocks that would accommodate a mix of house types and tenures.

A linear country park for informal recreation is proposed between the built development and wooded embankment. This proposal would represent an enhancement to the Green Belt and would be equivalent in area to the net developable area. The country park would include informal groups of native trees and opportunities for biodiversity enhancements including wildflower meadows.

A landscape led masterplan could deliver a scheme that would be accommodated on the Site without resulting in material harm to the wider landscape character.

#### Ecology

A Preliminary Ecological Appraisal (PEA) has been undertaken for the site (by Pleydell Smithyman Ltd) to understand its ecological interest and value with regard to habitats and protected species. There are no statutory designations within a 2km radius of the central point of the site and the European statutory designations, the Cannock Extension Canal Special Area of Conservation (SAC), the Cannock Chase SAC and the Mottey Meadows SAC are all located between 8 and 13 km from the site.

There are ecological non-statutory designations present within 2km of the site, the closest is the Lower Pool LWS approximately 520m to the north-east, however the Site is separated from the LWS by the A460. All other non-statutory designations are separated from the site by the M54 or are at least 1.5km from the site and as such it is unlikely that these sites will be subject to indirect impacts from the development of the site.

The closest priority habitat is the deciduous woodland situated along the southern boundary of the site. It will be necessary to ensure that any dust created during the operational stages of the development is minimised and this could be satisfactorily controlled through the production of a Construction Environmental Management Plan.

The site is considered likely to support habitats of ecological value including woodland, scattered trees, wet ditch/running water, hedgerows, grassland and scrub. Impacts to these habitats will be minimised through design and mitigation measures and the development will seek to avoid the removal of any notable or rare habitats.

The PEA concludes that the site is largely of low ecological value in terms of the habitats and species that it supports. Any identified habitats of importance would be retained where possible.

In line with recommendations within the National Planning Policy Framework (NPPF) and to ensure an overall biodiversity net gain of 10%, enhancements will be delivered on the site that are above and beyond the requirements for mitigation or compensation as a result of the proposed development. The proposed linear Country Park that would occupy the southern half of the site would be a suitable place for any enhancements to be provided.

In addition to the on-site Country Park proposals, Persimmon Homes control other land in the locality which can also be used for bio-diversity net gain enhancements as part of an overall package of ecological, landscape and accessibility improvements related to the delivery of this site.

#### Flood Risk

The Site lies within Flood Zone 1 and is therefore a sequentially acceptable for residential development. A watercourse is present along the northern boundary of the site and parts of the site are at risk from surface water (where this does extend across the site most of the risk is 'low').

The issue of flood risk was considered as part of the earlier planning application and appeal at the site and the Environment Agency, the Planning Inspector and the Secretary of State all concluded that the site can be developed and occupied safely in terms of flood risk. A detailed Flood Risk Assessment and Sustainable Drainage Scheme would be undertaken as part of any future planning application.



Figure 19: EA Flood Risk Plan

#### Noise

The site is bound by the M54 Motorway to the south and this represents a constraint on the development of the Site due to the potential for noise disturbance to the future occupiers of the homes.

The issue of noise was considered as part of the earlier planning application and appeal at the site and both the Planning Inspector and the Secretary of State concluded that this would not represent a barrier to development and that the detailed design stage would be the appropriate time to consider suitable mitigation. The Illustrative Masterplan (Appendix 2) shows that the proposed dwellings would be a minimum of 100m from the M54. There would be more than sufficient space to provide any necessary noise mitigation measures within the proposed linear country park.

Noise will be assessed in accordance with BS8233:2014 and World Health Organisation (WHO) Guidelines as part of the submission of a future planning application.



# 7. What is the Vision?

LAND AT BROOKHOUSE LANE, FEATHERSTONE 43



# 7. What is the Vision?

"An attractive residential development offering a choice of high-quality new homes to meet local and regional needs, and being integrated with and complementary to, the village of Featherstone."

Persimmon Homes West Midlands vision for the site is to deliver the following objectives:

- Deliver quality new homes which would make the best use of the land and contribute to the needs of Featherstone and the wider area.
- Achieve a choice of housing with a mixture of house types, tenures, and size to help meet local needs.
- Provide a high-quality design which will enhance the existing character and appearance of the village and the wider environment whilst providing a high standard of living for residents.
- Provide new homes with a range of energy-efficient features to promote economical and sustainable living.
- Enhance integration and accessibility with new cycle and pedestrian facilities for the benefit of both the existing and future community.
- Provide a new linear Country Park across half of the overall site for the benefit of both the future residents and the wider community, significantly increasing the quality and accessibility of the Green Belt in this location.
- Respect and capitalise on the individual site characteristics through the protection and enhancement of existing biodiversity and trees, and to deliver a clearly defined and permanent Green Belt boundary.
- Investment in the local community with the provision of a linear Country Park, enhanced pedestrian and cycle links and by employing local people during the construction of the development.
- Ensure the creation of a safe and desirable place to live that builds on the strength of the local community.

### Approach

Persimmon Homes West Midlands has developed a conceptual Illustrative Masterplan which reflects the identified opportunities and constraints, and which will ensure the delivery of the above vision and objectives.

The Illustrative Masterplan (Appendix 2) shows how the site could be developed whilst fully taking into account the various constraints and opportunities as set out below.

# **Site Constraints and Opportunities**

The vision for the site as depicted on the Illustrative Masterplan is derived from a careful analysis of the sites characteristics, its context and the constraints and opportunities. This analysis has been provided in more detail in the previous sections of this document and the principal constraints and opportunities are considered to be the following:

- A site which adjoins the southern boundary to Featherstone, a sustainable village that contains a number of services and facilities, all of which are within easy walking distance from the Site.
- Of all the sites to the edge of Featherstone the site has been identified by South Staffordshire Council as being the one with the lowest landscape sensitivity rating, with all other sites having either a medium or high rating.
- The site is defined by South Staffordshire Council, as making only a more limited contribution to the Green Belt and this proposal provides an opportunity to introduce a strong defensible boundary to the Green Belt.
- Respecting and enhancing the character and appearance of the village by identifying the best examples of existing development and

built form which can then help to inform the design principles for the Site.

- The site is within Flood Zone 1 but will be developed with a sustainable drainage strategy to reflect the topography of the site and the existing watercourse within the Site.
- The desirability of retaining and enhancing mature vegetation to the boundaries of the Site.
- Deliver new footways /cycleways within the site including potential links to the village to the North, including the provision of a footpath to the western site boundary.
- The need to respect the amenities of the occupiers of the existing residential properties to the north of the Site.
- The development of the Site allows for the opportunity to provide a linear Country Park which would result in significant benefits to existing and future residents alike.

- The development of the site is constrained by the presence of a gas pipeline running east to west across the Site.
- There will be a need to ensure that the amenities of the occupiers of future homes are provided to an acceptable standard in respect of noise and air quality.

As demonstrated on the Illustrative Masterplan the site can be developed with much needed new homes whilst taking account of all physical and environmental constraints and taking advantage of the site's opportunities by ensuring the delivery of a high quality housing development which is fully integrated with Featherstone.



### **Illustrative Masterplan**

The development framework for the site is shown on the Illustrative Masterplan and provides a basic structure to deliver the vision and objectives in the form of a comprehensively planned and high-quality residential extension to the existing village.

#### Access

A safe vehicular access can be provided to the western edge of the site and would for the creation of a footpath link along eastern edge of Brookhouse Lane, filling in the gap in the footpath along the existing road. A pedestrian / cycleway link from the site to the A460 to the east will be provided and the provision of further pedestrian links from the site to the existing residential streets to the north will be explored.

### Layout

A well-defined series of residential streets would be provided that respond to an internal road hierarchy. A well landscaped principal spine road would run from west to east with the residential development blocks accessed from that to the north.

The proposed linear Country Park, Locally Equipped Area for Play (LEAP), Local Area for Play (LAP) and Multi Use Games Area (MUGA) would both be provided to the south. Additional greenspace would be provided along the northern boundary of the site, providing a buffer between the existing residential properties and those proposed,

#### **Scale and Design**

The Illustrative Masterplan indicates that the site could comfortably accommodate approximately 156 new homes, based on a development density of 32 homes per hectare.

It is likely that all of the dwellings would be two-storey in height but any differences in building height would positively relate to the internal street hierarchy with any taller buildings being located along the primary road. The appearance of the dwellings will respond to the local vernacular and their relationships to open spaces, which attractive frontages presenting to the principal road through the site.

The density of the development would reflect the character of the existing dwellings within Featherstone to the north of the site.

#### Landscape and Drainage

A large linear Country Park will be provided to the southern half of the site. Additional green infrastructure will be provided along the northern and western site boundaries and between the development blocks towards the centre of the site and around the indicative drainage feature on the site. These areas will include areas of retained trees and hedgerows as well as additional planting and enhanced features relating to ecology and biodiversity.

In total approximately 5ha of open space could be provided across the whole site which equates to approximately 35% of the total development area.

#### Phasing / delivery timings

The Illustrative Masterplan allows for the development to be delivered in a single phase. Subject to the Local Plan being submitted for examination by the end of 2021 and adoption of the plan within 2022 the site could be delivered in its entirety by the 2025/26, providing an early and much needed contribution to the housing land supply in South Staffordshire and across the region.



48

# 8. Conclusion

LAND AT BROOKHOUSE LANE, FEATHERSTONE 49



# 8. Conclusion

The land at Brookhouse Lane is truly 'deliverable' (as defined in the NPPF) and should be released from the Green Belt through South Staffordshire's Local Plan Review and allocated for residential development. The Site provides a highly sustainable opportunity to accommodate circa 150 dwellings as part of a masterplan which delivers significant open space and green infrastructure to create a new defensible Green Belt boundary and fully integrate with the village of Featherstone.

### Available now

The Site is under the control of Persimmon Homes West Midlands, a national housebuilder are committed to delivering a sustainable residential community on the Site at the earliest opportunity following an appropriate allocation within the Local Plan Review. There are no legal or ownership impediments which would prevent the land from being delivered.

# Suitable

The Site is currently designated as Green Belt but the scale of the housing need within South Staffordshire, the wider region, and across the country, amounts to the necessary exceptional circumstance to justify the release of the Site from the Green Belt (in accordance with the NPPF). We have demonstrated that the release of the Site will not conflict with the five purposes of including land within the Green Belt.

We have also demonstrated that there are no technical constraints on the site that would prohibit its development for new homes, as per the earlier findings of both the Planning Inspectorate and the Secretary of State.

# Achievable

The NPPF definition of 'deliverable' refers to a site being achievable with a realistic prospect that housing will be delivered on site within five years. The assessment of whether a proposal is achievable should also include a judgement about the economic viability of the site and the capacity of the developer to complete the development over a certain period.

Featherstone is a sustainable village that is well located with regard to the wider strategic transport network. The site is predominantly greenfield and is unlikely to be subject to any significant remediation or preparation costs. Persimmon Homes West Midlands have reviewed the economic viability of the site and the indicative proposals in terms of land values, market demand, potential sales rates and development costs and can confirm that the development would be economically viable. As one of the largest national housebuilders Persimmon Homes has the capacity, and the desire, to deliver the development quickly.

In summary the Site will deliver a significant number of muchneeded new homes in the short to medium term in a sustainable location, by a leading housebuilder who are committed to delivering the development swiftly. Justified as such the Site and the proposals are truly 'deliverable'. Persimmon Homes West Midlands are committed to working with South Staffordshire Council and the local community to design a high-quality and sympathetic development which will deliver real benefits for the area. This document will be used to inform further discussions with the Council and will support Persimmon Homes West Midlands representations to the Local Plan Review and at the subsequent Local Plan examination.

