

SOUTH STAFFORDSHIRE LOCAL PLAN 2023-41 PUBLICATION PLAN

LAND EAST OF BILBROOK (ADDITIONAL LAND)



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1. Introduction

- 1.1 This representation, submitted on behalf of Bloor Homes Ltd, responds to the current Regulation 19 'Publication Plan' consultation document and accompanying published evidence, having regard to the national and local planning policy context. It relates specifically to additional land to the south east of the East of Bilbrook SDL where Bloor Homes has secured land interests. A site location plan is attached at **Appendix 1**.
- 1.2 Bloor Homes is also promoting the Land East of Bilbrook SDL. This land is subject to a separate representation.
- 1.3 The representations are framed in the context of the requirements of Local Plans to be legally compliant and sound. The tests of soundness are set out in the National Planning Policy Framework (NPPF), paragraph 35. For a Development Plan to be sound it must be:
- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - **Effective** – deliverable over the Plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the Framework and other statements of national planning policy, where relevant.
- 1.4 These representations also give consideration to the legal and procedural requirements associated with the plan-making process.
- 1.5 Chapter 3 of these representations provides comment in respect of the proposed spatial development strategy, Chapter 4 provides support for the additional land to the south east of the Strategic Development Location on land east of Bilbrook, and Chapter 5 provides an overview of the proposal and consideration of the Council's site selection process.

2. Planning Policy Context

2.1 Bloor Homes supports South Staffordshire District Council in progressing with a review of the South Staffordshire District Plan as required by Policy SAD1. This provides the opportunity for the Council to comprehensively review the following matters:

- South Staffordshire's own objectively assessed housing need and the potential for housing supply within the district (including existing safeguarded land identified through the Site Allocations Document) to meet this need.
- The potential role of housing supply options within the district to meet unmet cross boundary needs from the wider Greater Birmingham Housing Market Area (GBHMA), including from the Black Country.
- Employment land requirements for South Staffordshire
- South Staffordshire's potential role in meeting wider unmet employment needs through the Duty to Co-operate.
- The appropriateness of the existing settlement hierarchy and the strategic distribution of growth in light of new housing and employment needs.
- The need for further additional safeguarded housing and employment land for longer term development needs, and the role of safeguarded land in meeting housing shortfalls across the GBHMA, including South Staffordshire's own needs.
- Gypsy, Traveller and Travelling Showpeople provision.
- A comprehensive Green Belt Review undertaken jointly with the Black Country authorities, to inform any further Green Belt release to accommodate new development within the district.

2.2 The National Planning Policy Framework (NPPF 2023) requires local planning authorities to keep policies in their Local Plans up to date by considering a review at least once every five years.

2.3 Bloor Homes supports the Council's proactive approach in continuing with a review of the Local Plan to ensure that an up-to-date policy framework exists with the district to guide growth to 2041 and to ensure that development is genuinely plan-led.

- 2.4 The Preferred Options consultation document followed the identification of the Council's preferred spatial housing strategy in October 2019 and preferred allocations and policy directions in November 2021, which identified a proposed approach to delivering infrastructure-led development in line with settlement hierarchy and larger urban extensions focused to the north of the Black Country conurbation.
- 2.5 This revised Publication Plan identifies proposed site allocations to meet the identified housing requirement, including Land East of Bilbrook which is included as a proposed Strategic Development Location (Policy SA1).

Vision & Objectives

- 2.6 The Vision is clear and succinct, however as presently drafted it doesn't appear locally relevant and contains no spatially specific elements.
- 2.7 Bloor Homes supports the strategic objectives identified. These are considered succinct, locally relevant and relate to the most important areas of change or protection within the district.

3. Development Strategy

3.1 Bloor Homes supported Spatial Housing Option G identified through the previous Strategic Housing Strategy and Infrastructure Delivery consultation undertaken in 2019 and the strategy set out in the previous Publication Local Plan in 2022. It is noted the updated spatial development strategy represents a refinement of Spatial Housing Option C which is more aligned to the current approach in the adopted Core Strategy.

Policy DS1: Green Belt

3.2 In terms of the strategic approach to the Green Belt there is an acknowledgement within the Local Plan that there needs to be changes to the Green Belt boundary to accommodate growth requirements within the Plan period. It is agreed that Green Belt release is necessary to deliver a sustainable spatial strategy.

3.3 Bloor Homes agrees that exceptional circumstances exist for Green Belt release within the district to allow for sustainable development within the plan period.

3.4 The Publication Plan recognises that the character of South Staffordshire is directly influenced by the fact that around 80% of the district lies within the West Midlands Green Belt. The rural nature of the district also results in a lack of brownfield opportunities to meet any future housing needs beyond the proposed plan period.

Policy DS2: Green Belt Compensatory Improvements

3.5 Bloor Homes recognises that the Local Plan should 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 as required by para 147 of the NPPF.

3.6 The proposal for land to the east of Bilbrook identifies adjacent land, to remain in the Green Belt, to provide compensatory improvements. Such improvements will include the provision of public access as part of an overall green infrastructure strategy that will also secure improvements to environmental quality of this land.

Policy DS4: Development Needs

3.7 Bloor Homes generally supports the policy approach set out in Policy DS4 Development Needs however further commentary is set out below in respect of different components of the housing requirement arrived at.

Local Housing Need

- 3.8 The Strategic Housing Market Assessment (SHMA) 2021 sets out a minimum housing requirement of 254 dpa based on the Government's standard method, utilising the 2018 Affordability Ratios. Bloor Homes welcomes the publication of a SHMA update in 2024 which reconsiders the minimum housing requirement having regard to the latest Affordability Ratios (2022) which results in a minimum net annual requirement of 227 dwellings.
- 3.9 The PPG is clear however that the standard method identifies a minimum annual housing need figure and does not produce a housing requirement figure recognising there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.
- 3.10 Paragraph 010 of the PPG (ID: 2a-010-20201216) states:

"Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:

- growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);*
- strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or*
- an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;"*

- 3.11 Other circumstances that should be considered in respect of South Staffordshire District include the balance between homes and jobs created over the plan period.
- 3.12 These circumstances are considered in further detail below.

Unmet Need from Neighbouring Authorities

- 3.13 The unmet housing need arising from within the wider Greater Birmingham and Black Country Housing Market Area is well documented.
- 3.14 The Birmingham City shortfall was tested through the BDP EiP and an unmet housing need to 2031 of 37,900 homes was confirmed. Birmingham City Council has now commenced a review of the Birmingham Development Plan, with an

Issues and Options consultation published in 2022. The Issues & Options document recognised that the BDP was unable to identify enough land to meet all of Birmingham's housing need and there is still a need to work with neighbouring authorities within the Housing Market Area (HMA) to deliver a housing shortfall. Birmingham City Council has identified a shortfall of around 78,415 dwellings following an assessment of potential capacity from all sources. While this figure will be refined through Birmingham's plan making process, the shortfall to 2042 will remain significant.

- 3.15 The Black Country LPAs, were until this Autumn, undertaking a review of the Black Country Plan which is aligned to the timescales of the South Staffordshire Local Plan review. Evidence that informed the emerging Black Country Local Plan included an urban capacity assessment. The Urban Capacity Review (2019) concluded that the amount of housing need which could not be accommodated in the Black Country urban areas remained significant, at around 26,920 homes to 2038.
- 3.16 The Draft Black Country Plan 2018-2039, subject to consultation in 2021, identified a shortfall of 28,239 homes to be exported to neighbouring LPAs through the Duty to Co-operate.
- 3.17 The shortfall figures above did not take into consideration the 35% urban uplift introduced in December 2020 which would be applicable to both Birmingham and Wolverhampton.
- 3.18 The Black Country LPAs took a decision to abort the joint plan-making approach to instead progress separate Local Plans.
- 3.19 The individual Black Country Authorities are now preparing their own Local Plans. Wolverhampton City Council consulted on a Regulation 18 Consultation Plan (dated February 2024) which identified a potential 11,413 dwellings shortfall. Sandwell Council held a Regulation 18 consultation ending in December 2023 which estimated around a 18,000 dwellings shortfall. Dudley Council also held a Regulation 18 consultation ending in December 2023 which estimated around a shortfall of 1,078 dwellings. It is Walsall Council's intention to proceed under new arrangements of plan making.
- 3.20 Bloor Homes supports the Council providing a contribution to assist in meeting these unmet needs, however, raises concerns that this is not evidence based. The capacity-led approach, resulting in a contribution of 640 home contribution to the shortfall, will need to be explored and tested through the Examination in Public with neighbouring LPAs.

Economic Uplift

- 3.21 The SHMA sets out the broad economic consequences of the projected growth in Chapter 5. This references the Economic Development Needs Assessment (EDNA). The EDNA Update 2024 forecasts an additional 5,326 net additional jobs in South Staffordshire over the period 2020-2041. This compares to the 4,824 jobs within the district between 2020 and 2040 identified in the previous EDNA. This forecast is based upon methodologies of two of three forecasting houses that do not provide the basis to identify significant growth in the transport and storage sector.
- 3.22 The number of jobs to be created within South Staffordshire is likely to significantly exceed the 5,326 jobs forecast by virtue of committed development at the West Midlands Interchange (WMI) which will provide significant growth in the transport and storage sector. The WMI itself is projected to create 8,500 jobs of which 40% will be higher skilled.
- 3.23 At present the SHMA assumes that the projected growth of the working age population in South Staffordshire will grow by just 1,012 people between 2023 and 2041. This is significantly lower than the forecast jobs growth outlined in the EDNA. Further consideration should therefore be given to whether the minimum local housing need figure derived from the standard method would support the necessary growth in the working age population to create a balanced community within South Staffordshire to support such jobs growth, even taking into consideration the 640 additional homes to meet unmet needs in the wider housing market area.
- 3.24 Further evidence is necessary to consider the balance between jobs and the working age population that would be necessary to satisfy the jobs demand. This may require an uplift in local housing needs identified.

Policy DS5: The Spatial Strategy to 2041

- 3.25 Bloor Homes supports the proposed spatial strategy to 2041 which recognises environmental capacity and seeks to make best use of existing infrastructure whilst recognising opportunities to delivery new infrastructure.

Settlement Hierarchy

- 3.26 Bloor Homes supports the settlement hierarchy which considers the relative sustainability of villages within South Staffordshire District. The Tier 1 and Tier 2 settlements identified contain the widest range of services and facilities and by focusing new homes to these settlements would provide an opportunity to

increase sustainability and self-containment. Codsall/Bilbrook and Penkridge appear to achieve the highest services/facilities rankings of all villages within the district.

Spatial Distribution of Housing Growth

- 3.27 Bloor Homes supports the distribution of housing growth to the most sustainable villages, including Codsall/Bilbrook to deliver a higher amount of growth.
- 3.28 Housing growth also appears to be focused to the north of the district which aligns to the location of the Tier 1 settlements and the proposed employment strategy, that seeks to deliver thousands of new jobs in the northern extent of the district, including the freestanding and expanding employment site of i54 South Staffordshire within close proximity to Bilbrook.
- 3.29 Bloor Homes considers that the proposed development strategy not only assists in providing improved infrastructure but also has due regard to where housing needs exist.
- 3.30 This strategy provides the opportunity to ensure that the necessary homes, along with supporting infrastructure, would be delivered in a timely and coordinated manner, to meet both the local needs arising from within the district, alongside an element of unmet needs arising from the wider GBBCHMA.

4. Site Allocations

- 4.1 Bloor Homes has a number of land interests within South Staffordshire District. This representation relates to Land East of Bilbrook.
- 4.2 Bloor Homes recognises the importance of the two proposed strategic housing allocations in delivering the spatial strategy for the district to 2041. Due to the scale of the two sites, Bloor Homes supports the inclusion of site-specific policies to establish a vision for each site, alongside a requirement for a detailed masterplan and design code.

Policy SA1: Strategic development location: Land East of Bilbrook

- 4.3 Bloor Homes has worked collaboratively with the Council, the City of Wolverhampton City Council, other stakeholders, infrastructure providers and the Council's masterplanning consultants in developing a shared Vision and set of Objectives for the new neighbourhood east of Bilbrook. This process has been informed by the preparation of a range of site-specific technical documents prepared by Bloor Homes and evidence produced by the Council.
- 4.4 Bloor Homes supports this site Vision, Objectives and Concept Plan for Land East of Bilbrook contained within the Publication Plan. This will form the basis of further technical work and the ongoing preparation of a comprehensive masterplan and design code to inform a future planning application.
- 4.5 In respect of Land East of Bilbrook, the proposed strategic housing allocation, provides an opportunity to deliver 750 dwellings alongside new infrastructure as identified in Policy SA1. The previous Publication Plan, published in Autumn 2022, required a minimum delivery of 848 homes within the Land East of Bilbrook SDL. Inclusion of the additional land, promoted through this representation, through Policy SA1, would offer the opportunity to increase levels of housing delivery to achieve the previously envisaged level of growth within this strategic location.
- 4.6 The additional land would yield a further 150 dwellings and would align to the wider vision and objectives identified through Policy SA1 for Land East of Bilbrook.
- 4.7 A masterplan is attached at **Appendix 2** which demonstrates how the additional land would form a logical extension to the SDL, close to the proposed community hub and contained by existing woodland to the south of the site.
- 4.8 Bloor Homes' land interests extend to all land within the proposed East of Bilbrook allocation, including the additional land subject to this representation, with agreements in place between the landowners and Bloor Homes, providing

confidence that a comprehensive and co-ordinated approach to development can be achieved in its delivery.

- 4.9 Bloor Homes can demonstrate the additional land is suitable, available and achievable, with further information provided within Chapter 5 of this representation.

Policy MA1: Masterplanning Strategic Sites

- 4.10 Bloor Homes supports the Council's masterplanning approach to ensure high quality design. Bloor Homes confirms that a comprehensive and deliverable site-wide Strategic Master Plan will be prepared in respect of the Strategic Development Location at Bilbrook. This will be prepared in conjunction with the Council and informed through pre-application discussions.
- 4.11 It is the intention of Bloor Homes to prepare this site-wide Strategic Master Plan (SMP) to inform a future planning application, recognising that this Masterplan will be agreed prior to the determination of any planning application.
- 4.12 The SMP will be prepared having regard to the requirements established through SA1 and the suite of proposed development management policies. In addition, the preparation of a masterplan and design code will provide opportunity for a collaborative approach including engagement with the local community and key stakeholders. Engagement with key infrastructure providers through the Local Plan review process and through the collaborative approach in preparing the SMP should result in refinement of the Infrastructure Delivery Plan (IDP) with the identification of infrastructure requirements, costs and phasing of delivery.
- 4.13 Bloor Homes welcomes the amendment to Policy MA1 that provides further clarity in respect of the process for submitting and approving the SMPs.
- 4.14 Policy MA1's scope is appropriate, but it should be amended to ensure that it is effective in NPPF terms. The policy should allow for the approval of SMPs through the application process where an application has been submitted for any part of a strategic allocation. The policy should also clarify that SMPs should broadly align with the scope of Concept Plans, but that technical assessments should fundamentally drive the most appropriate proposal.
- 4.15 The masterplan attached at **Appendix 2** demonstrates how the additional land can be effectively incorporated within a Strategic Master Plan without undermining the agreed vision and objectives of this strategic growth location.

5. Additional Land: East of Bilbrook

- 5.1 This Chapter sets out a brief description of the additional land to the east of the East of Bilbrook SDL, followed by an assessment of the site against each of the Council's site selection criteria, as defined within the Housing Site Selection Topic Papers published in 2021, 2022 and 2024.
- 5.2 A Land East of Bilbrook Masterplan, incorporating this additional land, has been prepared and is attached at **Appendix 2** to this representation which provides further detail.

Site Description

- 5.3 Bloor Homes has current land interests on all land within the East of Bilbrook SDL and additional land, to the south east of the site, as shown on the Site Location Plan appended to this representation (see **Appendix 1**).
- 5.4 The additional land comprises two field parcels in agricultural use extending to approximately 4ha. Both field parcels are defined by managed hedgerows. The north and western boundaries adjoin the proposed East of Bilbrook SDL and the southern boundary is enclosed by existing woodland. The River Penk and Barnhurst Pitches lies beyond the southern boundary.
- 5.5 The site has been subject to the Council's site selection assessment (Site Ref: 500) which concluded *'the site is disassociated from Bilbrook development boundary and Site 519 (which adjoins development boundary) but is now in control of some housebuilder (Bloor Homes) as Site 519, offering a chance to deliver a comprehensive scheme, Small part of site is Flood Zone 3 - this is excluded from overall area.'*
- 5.6 This proposed East of Bilbrook SDL represents a logical and sustainable urban extension to the Tier 1 settlement of Bilbrook, providing an opportunity for delivering approximately 750 additional new homes with associated supporting infrastructure, including the provision of a new first school, a new mixed-use community hub and a new primary road between Lane Green Road, Pendeford Mill Lane and Barnhurst Lane. The additional land is adjacent to the proposed SDL and therefore not disassociated with Site 519 as set out in the Council's site assessment. This is demonstrated by the illustrative masterplan attached at **Appendix 2**.
- 5.7 The illustrative masterplan, including the additional land, identifies the following key components:

- Provision approximately 900 homes and specialist older persons accommodation of approximately 75 units;
- Provision of a centrally located first school (capable of expansion to 2FE) and mixed-use community hub centred around a new piazza;
- Provision of approximately 20.4 hectares of green and blue infrastructure, evenly distributed throughout the site, including provision of amenity greenspaces, green corridors, SuDS and equipped play;
- Incorporation of existing watercourse;
- Creation of a new through route between Lane Green Road, Pendeford Mill Lane and Barnhurst Lane; and
- Provision of footways and cycleways to provide active travel links with existing infrastructure.

5.8 Inclusion of the additional land within the SDL would not undermine the vision, objectives and key design principles agreed to date.

Sustainability Appraisal (SA) Findings

5.9 The Council's Sustainability Appraisal (2024) provides an assessment of sites both pre and post mitigation and provides assessment of reasonable alternatives against the SA Objectives.

5.10 It is noted that the post-mitigation site assessment for the additional land (Site 500) scores consistently with that of Land East of Bilbrook (Site 519) with the exception of SA Objective 12 (Economy & Employment) where the additional land score a '+' and the wider SDL site scores a '-'. Both sites score a double negative in respect of SA Objective 11 (Education) due to the sites being located outside of the target distance for education for all primary ages. This appears irrelevant on the basis the site can provide a new First School to address current capacity issues as required by Policy SA1. It should be noted that Policy SA1, which relates to Land East of Bilbrook, achieves a score of double positive in respect of this Objective. The proposed First School is proposed to be centrally located within the scheme with the inclusion of the additional land. If the additional land were to be included within the SDL it is contended that the SA assessment for Policy SA1 would remain the same.

5.11 The additional land, adjacent to the proposed East of Bilbrook SDL, is sustainably located and can be seamlessly integrated into the wider SDL

proposal. The additional land would be well related to the proposed supporting services and facilities including proposed First School and other retail and community facilities.

Sequential Test

- 5.12 The Council's spatial development strategy identifies an infrastructure led approach to growth. Bloor Homes agrees that additional growth is required in the Tier 1 settlements of Codsall/Bilbrook, beyond the existing levels of safeguarded land and urban capacity to deliver this infrastructure-led approach. This will require the release of further Green Belt land.

Green Belt Harm

- 5.13 Whilst the Council's Green Belt Assessment (2019) indicates that development of the SDL site would result in a 'high' level of harm to the purposes of the Green Belt, the conclusion for Green Belt Sub-Parcel ref: S46Cs2 confirms the weakening of the Green Belt in respect of releasing this site for development would be limited:

"The sub-parcel makes a strong contribution to preventing sprawl of the West Midlands conurbation and preventing encroachment on the countryside. Although this land contributes to the Green Belt gap between surrounding settlements, those parts of the sub-parcel that do not extend into the more vegetated River Penk corridor are more closely associated with adjoining existing development, and therefore their release would constitute a limited weakening of the Green Belt."

- 5.14 The conclusion that the release of the SDL site would constitute a limited weakening of the Green Belt is supported by Bloor Homes.
- 5.15 The additional land is determined by the Council's Green Belt Assessment to fall within an area of 'very high' harm, as a result of built development. It states that the wooded River Penk corridor running through the sub-parcel plays a key role in the separation of Bilbrook and Wolverhampton.
- 5.16 Bloor Homes disputes the conclusions of the Green Belt Assessment in respect of Green Belt harm as a result of development of the additional land. The illustrative masterplan demonstrates that an extension of the proposed SDL into this additional land, would not breach the wooded River Penk corridor. Instead, the existing wooded River Penk corridor would form a natural and robust new Green Belt boundary and would not undermine the existing lack of intervisibility between Bilbrook and Wolverhampton.

Landscape Sensitivity

- 5.17 South Staffordshire District Council's Landscape Study (2019) finds that the site has 'moderate' sensitivity in landscape terms. The additional land lies within the same landscape parcel as the wider SDL.
- 5.18 Whilst the findings of the Landscape Study are not necessarily disputed by Bloor Homes, the site has previously been assessed through the Site Allocations Document process as having a 'low impact' on landscape sensitivity. It is, therefore, not understood how the landscape sensitivity of the site has increased, particularly now land at Pendeford Mill Lane (Site Allocation Ref: 443) has a consent for the delivery of 164 homes.
- 5.19 Nevertheless, it is considered that the development of the site for residential purposes represents an opportunity to strengthen existing field boundaries within and to the edges of the site. Furthermore, the development of the site facilitates the opportunity to strengthen the strong landscape provided by the wooded River Renk corridor, which would serve to define the south eastern edge of Bilbrook.
- 5.20 The landscape strategy for the additional land would reflect the following key features identified for the adjacent SDL:
- 5.21 It is contended that the additional land, in the context of the wider SDL, is able to accommodate the proposed residential led development without causing undue harm to the landscape character and visual amenity of the site and surrounding countryside and footpath network.

Impact on the Historic Environment

- 5.22 Bloor Homes has commissioned Orion to prepare a heritage report, which draws together the available archaeological, historic, topographic and land-use information in order to clarify the heritage significance and archaeological potential of land proposed for development.
- 5.23 The assessment establishes that there are no designated heritage assets (World Heritage Sites, Scheduled Monuments, Listed Buildings, Registered Battlefields, Registered Historic Parks or Conservation Areas) within the study site, and that development of the study site will not affect the significance of any designated heritage assets, nor their settings, in the surrounding area.
- 5.24 In summary, the technical work undertaken to date concludes there are no heritage constraints to the allocation of the site for residential development.

Flood Risk

- 5.25 The majority of the additional land lies within Flood Zone 1 which has the lowest probability of flooding. The south eastern extent of the site lies within Flood Zone 3 and this relates to the River Penk floodplain within the woodland corridor. The illustrative masterplan at **Appendix 2** demonstrates that development would not encroach on the functional floodplain.
- 5.26 A Sustainable Drainage Strategy (SuDS) is proposed:
- To efficiently drain the site whilst not causing flooding downstream;
 - To create suitable habitats to promote biodiversity;
 - To create ecological corridors across the site;
 - To create an aesthetically pleasing setting for development; and
 - To promote the site as a sustainable place to live and work.

Highways (Accessibility to the Site)

- 5.27 The additional land would be accessed via the adjacent SDL site which proposes a new primary roundabout access located to the east of the approved access on Pendeford Mill Lane and additional primary access points off Lane Green Road and from the east off Barnhurst Lane. The site would connect, via a secondary street, into the primary active travel corridor.
- 5.28 An emphasis is placed on active travel with the provision of footways and cycleways providing a high level of permeability within the site and links beyond the site to existing services and facilities. The additional land is conveniently located adjacent to the proposed community hub providing easy access to the proposed First School and other retail/commercial/community uses.

Impact on Current Land Use

- 5.29 The site currently comprises several parcels of land utilised for agricultural use and used mainly for grazing. There are no Public Rights of Way across the site and contains no publicly accessible open spaces or community uses that would be lost as a result on development.
- 5.30 To the contrary, the proposal would deliver an additional 4ha of green infrastructure including public open space that would link into the green infrastructure network on the adjacent SDL site.

Impact on Natural Environment

- 5.31 There are no statutory designated sites of nature conservation value within or immediately adjacent to the site. The nearest SSSI is Big Hyde Rough SSSI which is located approximately 5.5km north of the site. This SSSI is designated as ancient woodland habitat containing a large floristic diversity. This SSSI is well separated from the site by major and minor roads and open countryside, and as such it is not considered there will be any adverse direct or indirect effects on this statutory designated site as result of the proposals. The site lies outside the Impact Risk Zone for the Big Hyde Rough SSSI.
- 5.32 The nearest Local Nature Reserve (LNR) is Smestow Valley LNR which is located over 1km southeast of the site. This LNR is designated for its pockets of woodland and meadow and its importance to birdlife and is separated from the site by open countryside, minor and major roads and existing residential development, and as such, it is not considered there will be any direct or indirect adverse effects on this statutory designated site.
- 5.33 There are a number of hedgerows present within the site which define field boundaries. The illustrative masterplan has regard to these hedgerows and these can remain in situ save for access.
- 5.34 Existing trees within the site are largely confined to the River Penk wooded corridor. It is proposed that built development would be offset from the woodland.
- 5.35 The agricultural land contained within this site is believed to be predominantly Grade 3 (split between 3a and 3b is unknown at this time).
- 5.36 However, the same is true for the majority of land around Bilbrook and therefore should not reflect negatively against this site.

Impact on Environmental Quality

- 5.37 The agricultural site is unlikely to have significant issues in relation to contamination, and the surrounding context of the site is not considered to represent constraints in relation to air quality and noise.
- 5.38 Whilst it is accepted that development is unlikely to improve the environmental quality of the site, as there are no existing issues of contaminated land, development would not give rise to any further environmental quality issues.

Site-Specific Opportunities

- 5.39 As set out previously within this representation, the development of the site for residential purposes presents the opportunity to increase housing delivery within the Tier 1 settlement of Bilbrook by integrating further homes and green infrastructure into the wider East of Bilbrook SDL.

Suitability

- 5.40 The information set out above, read in conjunction with the appended illustrative masterplan, demonstrates that the additional land represents a suitable and logical extension to the proposed East of Bilbrook SDL.

Deliverability

- 5.41 There are agreements in place between the landowners and Bloor Homes to facilitate the development of the site.
- 5.42 Bloor Homes intends to undertake further technical work to demonstrate the deliverability of land east of Bilbrook, however information gathered to date concludes that there are no physical or other constraints likely to render the site undeliverable within the proposed Plan period to 2041. The site is available now.
- 5.43 The site is deliverable and immediately available and, subject to allocation and removal of an element of the site from the Green Belt, could start to deliver homes and associated community benefits within the next 5 years. Bloor Homes already recently completed construction of 164 homes accessed off Pendeford Mill Lane which would represent the first phase of the wider Land East of Bilbrook proposal.

6. Conclusion

- 6.1 This representation is made by Evolve Planning on behalf of Bloor Homes to the South Staffordshire Local Plan Review, updated Publication Plan (Regulation 19) consultation. This representation relates to further land to the south east of the Land East of Bilbrook SDL, a proposed strategic development location, which Bloor Homes is promoting for residential-led development.
- 6.2 Bloor Homes supports the Council's proposed spatial development strategy, which includes the proposed strategic allocations Bilbrook. Focusing growth to Tier 1 and Tier 2 settlements provides a sound approach to distributing housing growth.
- 6.3 Bloor Homes supports the proposed Local Plan, however specific comments are provided in respect of the housing requirement, a number of development management policies and the Council's consideration of the evidence base in relation to Land East of Bilbrook.
- 6.4 The information contained within this representation, read in conjunction with the appended Vision Document and the Council's published evidence base demonstrates that Land East of Bilbrook is a suitable and deliverable site for residential development, subject to its release from the Green Belt.
- 6.5 It is therefore submitted that the additional land to the south east of the proposed Land East of Bilbrook SDL represents a sound housing allocation and should be considered if, through the Examination in Public process, omission sites are required to make the Local Plan sound.

APPENDIX 1

Site Location Plan

LEGEND
Potential Additional Land
Site Boundary



APPENDIX 2

SDL Masterplan including Additional Land

LAND BUDGET

SITE AREA

8.53
HECTARES

NET
DEVELOPMENT AREA

→ 4.01 ←
HECTARES



DENSITY: c.37.5
DWELLINGS PER HECTARE



CAPACITY



c. 150 UNITS

(INCLUDING AFFORDABLE UNITS)

GREEN
INFRASTRUCTURE
(ON-SITE):

c. 4.41
HECTARES





EVOLVE
PLANNING + DESIGN